

**SOUTHWEST JORDAN VALLEY GROUND WATER CLEANUP PROJECT
STATE OF UTAH NATURAL RESOURCE DAMAGE TRUSTEE**

**COMMENT RESPONSE SUMMARY
AUGUST 31, 2004**

***Response to Common Comment No. 8 – No Discharge of Reverse Osmosis Treatment
Plant Concentrates to the Jordan River***

Many individuals and groups commented on the proposal to discharge the concentrates from the proposed Jordan Valley Water Conservancy District (JVWCD) reverse osmosis (RO) water treatment plant to the Jordan River. JVWCD obtained a UPDES discharge permit from the Division of Water Quality (DWQ) in the fall of 2003, and it would have relied on that discharge permit as part of its operations under the Joint Natural Resource Damage (NRD) Proposal. Commenters expressed concern about the potential environmental impacts on the Jordan River and downstream wetlands that might arise from the concentrate discharge. In response to the concerns expressed in those comments, JVWCD withdrew the permit for discharge to the Jordan River on January 14, 2004. On January 20, 2004, DWQ acknowledged receipt of the letter and withdrew the permit.

The Trustee convened a Stakeholder Forum in order to improve public involvement in the ongoing review of remediation work by Kennecott. JVWCD asked the Stakeholder Forum to consider alternatives to discharge of concentrates to the Jordan River. The Stakeholder Forum considered 15 alternatives for disposal of Zone B and shallow aquifer concentrates, including a “no action” alternative. After considering the public comments, the work of the Stakeholder Forum, and discussions with the Trustee, JVWCD revised the Joint Proposal to eliminate the discharge of any concentrates to the Jordan River. Instead, the Proposal was revised to include three alternative options. In July 2004, the Trustee decided to reopen the public comment period to allow for additional public comment on the changes to the Joint NRD Proposal.