



**COUNTY OF PLACER
FACILITY SERVICES DEPARTMENT**

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April 15, 2010

Central Valley Regional Water Quality Control Board
NPDES – Sacramento Watershed Unit
Attn: Diana C. Messina
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

**SUBJECT: COMMENTS REGARDING TENTATIVE ORDER FOR PLACER
COUNTY SEWER MAINTENANCE DISTRICT 1 WASTEWATER
TREATMENT PLANT**

Dear Ms. Messina:

Thank you for the opportunity to submit comments regarding the Tentative Waste Discharge Requirements for Placer County Sewer Maintenance District 1 (SMD 1) wastewater treatment plant (Tentative Order). We appreciate the time and effort that you and your staff have devoted to developing the Tentative Order, and are hopeful that we will be able to work through the remaining significant issues prior to the May hearing before the Regional Water Quality Control Board.

With regard to the Tentative Order, the County continues to have significant concerns about a number of the proposed provisions and requirements. These include:

- The County's request for an expansion in permitted capacity
- Inclusion of requirements prescribing the manner of treatment
- Inclusion of effluent limitations for aluminum, arsenic, copper, lead, electrical conductivity
- The need for an in-permit compliance schedule for BOD and TSS

Each of these issues is described in detail in Attachment A, which also includes a number of recommended clarifying changes to the Tentative Order, Fact Sheet, and Monitoring and Reporting Program.

In addition, we feel that it is important to demonstrate that over the past several years, the County has in fact actively pursued facility improvements, inflow and infiltration controls and other strategies and made significant progress toward compliance. Attachment B provides the Regional Water Board with a detailed summary of the County's efforts in terms of regionalization, inflow and infiltration controls, and facility

11476 C Avenue Auburn CA 95603
Entrance at 2855 2nd Street

SMD 1 WWTP – Comments to Tentative Order
Ms. Diana Messina
April 15, 2010
Page 2

improvements. This information demonstrates the County's diligence in pursuing compliance through both regionalization and facility and collection system improvements.

We will contact you early next week to discuss scheduling a follow up meeting with Regional Water Quality Control Board staff to discuss our comments prior to the adoption hearing. If you have any questions or concerns please contact David Atkinson of my staff at (530) 886-4968.

Sincerely,



Will Dickinson, Deputy Director

WD/KS

ATTACHMENTS:

Attachment A – Placer County Comments on Tentative Waste Discharge Requirements and Cease and Desist Order for Placer County Department of Facility Services Placer County SMD 1 Wastewater Treatment Plant

Attachment B - Compliance Activities, Operations Changes, Collection System Improvements, Regionalization, and Upgrade Expansion Plans for the SMD 1 Wastewater Treatment Plant

cc: Webster J. Owen Jr., Owen Psomas
Michael Bryan, Roberston-Bryan