

May 2, 2011

**DELIVERED BY EMAIL**

Ms. Diana Messina  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

**Subject: El Dorado Irrigation District Comments on Tentative Order Amending Waste Discharge Requirements Order No. R5-2008-0173 for the Deer Creek Wastewater Treatment Plant (NPDES No. CA0078662) – Additional Comment**

Dear Ms. Messina:

On behalf of the El Dorado Irrigation District (District), Robertson-Bryan, Inc. (consultant to the District) is submitting this additional District comment on the Tentative Order amending Waste Discharge Requirements Order No. R5-2008-0173 issued for the Deer Creek Wastewater Treatment Plant. This comment is in addition to comments submitted on behalf of the District to you earlier today and relates to the Tentative Order's findings justifying the pH and temperature monitoring requirements.

The District concurs with the finding on page F-66 of the Fact Sheet that the additional monitoring expense associated with either: (i) having its on-site laboratory re-certified or (ii) having certified laboratory personnel travel to the District's facility and conducting pH and temperature sampling on site is economically impossible for the District without further increase in local sewer fees. However, we request a correction to Item 6 on page 2 of the Tentative Order. The finding states that the District's sewer rates have been raised up to 15 percent. This is correct in part, but it does not tell the entire story. In fact, the District issued a 218 notification and approved a 5-year water and sewer rate increase that, taken cumulatively, is a 57 percent rate increase over that timeframe. In addition, to reduce the operating budget and to reduce rate increases beyond the approved 57 percent rate increase, the District laid off 45 people since mid 2008. The District has also eliminated several positions through attrition since 2008. The lay-offs combined with the position eliminations has resulted in a 30 percent staff reduction since mid 2008.

The District does not have budgeted operating funds to pay for the cost associated with certifying the Deer Creek Wastewater Treatment Plant laboratory. The District contends that certifying the Deer Creek laboratory for sampling of pH and temperature would be a waste and misuse of public funds.

If you have any questions regarding the enclosed comments, please contact Elizabeth Wells at (530) 642-4146 or myself at (916) 714-1802.

Sincerely,

**ROBERTSON-BRYAN, INC.**



Michael D. Bryan, Ph.D.  
Principal Scientist/Partner

cc: Elizabeth Wells, Co-Manager Wastewater/Recycled Water-Engineering (District)  
Victoria Caulfield, Co-Manager Wastewater/Recycled Water-Operations (District)  
Gayleen Perreira, Regional Water Board  
Joshua Palmer, Regional Water Board