



Wastewater Management

Main Office

May 23, 2011

10060 Goethe Road

Sacramento, CA 95827-3533

Tele: (916) 876-6000

Submitted via email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Fax: (916) 976-5160

**SUBJECT: Comment Letter - Delta Methylmercury TMDL (SRCSD Comments)**

Sacramento Regional Wastewater

Dear Chair Hoppin and Board Members:

Treatment Plant

Thank you for the opportunity to review and provide comments on the Delta Methylmercury TMDL (TMDL). The following comments are being provided by the Sacramento Regional County Sanitation District (SRCSD). SRCSD owns and operates the Sacramento Regional Wastewater Treatment Plant and provides sewer conveyance and treatment to over 1.3 million residents and businesses in the greater Sacramento region. SRCSD is regulated as a discharger and is directly affected by the Delta Methylmercury TMDL.

8521 Legend Station Road

Elk Grove, CA 95758-9550

Tele: (916) 876-9000

Fax: (916) 876-9000

**Board of Directors**

**Representing:**

SRCSD staff and management participated in the stakeholder process for several years during development of the TMDL documents and Basin Plan Amendment (BPA). Although the process was time consuming and resource intensive, we concur with many of the other stakeholders that it was a valuable process that we would recommend for similar future complex water quality issues. In addition, we are appreciative of the efforts of both the Central Valley Regional Water Quality Control Board and the State Water Resources Control Board in their commitment to working with the stakeholders to make the TMDL and Basin Plan Amendment adaptive and workable.

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

SRCSD provides the following comments related to the subject document and future implementation process:

Stan R. Dean

District Engineer

1. We encourage ongoing stakeholder collaboration with continued involvement of the State and Regional Water Board staff and management to ensure successful implementation.
2. The State Water Board and Regional Water Board should oversee implementation of the TMDL and encourage continued feedback from the regulated entities to ensure that affected rate payers, utilities and dischargers do not pay more than their fair share of the costs for methylmercury control.

Prabhakar Somavarapu

Director of Policy and Planning

Ruben Robles

Director of Operations

Chair Charles Hoppin and Board Members

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3. The State Water Board and Regional Water Board should continue to accept feedback from regulated dischargers to ensure that the provisions of the TMDL and BPA, such as "no penalty for early load reductions", are being applied fairly and consistently and in accordance with the written documents.
4. SRCSD supports a complete re-evaluation of the TMDL and BPA after completion of Phase 1. The results of the control studies should be evaluated in a holistic manner and an integrated fashion. Any changes to the documents and any further actions mandated or required as a result of the control studies should be vetted through a collaborative stakeholder process. In addition, required controls or other regulatory requirements should not place an inequitable financial burden on dischargers – they should be in proportion to the discharger's contribution to the loading within the receiving waters. And only those controls that result in a measurable mercury or methylmercury reduction and quantifiable and meaningful water quality benefit should be required.
5. Mercury and methylmercury in the Sacramento – San Joaquin Delta are predominantly due to legacy sources. NPDES dischargers make up only a small fraction of the mercury/methylmercury loads. As compliance with the TMDL will be costly for all dischargers, the State and Regional Water Boards should continue to assist communities find funding to offset the added costs for the mercury/methylmercury control studies and reduction efforts, exposure reduction efforts and other requirements included in the BPA.

Additionally, SRCSD supports the comments provided by the Central Valley Clean Water Association on this same topic. Thank you for the opportunity to comment on the Delta Methylmercury TMDL. If you or your staff has any questions, please do not hesitate to contact me at (916) 876-6092 or Lysa Voight at (916) 876-6038.

Sincerely,

  
Terrie Mitchell  
Manager, Legislative & Regulatory Affairs

cc: Stan Dean, District Engineer  
Prabhakar Somavarapu, Director of Policy and Planning  
Ruben Robles, Director of Operations  
Pamela Creedon, Executive Officer, CVRWQCB  
CVRWQCB Chair and Members  
Debbie Webster, Executive Officer, Central Valley Clean Water Association