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August 12, 2013

Mr. James Marshall
Water Resources Control Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Sacramento Regional Wastewater Treatment Plant

8521 Laguna Station Road
Elk Grove, CA 95758-9550
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Subject: Sacramento Regional County Sanitation District's Comments on the Tentative Draft Amendment Order of the Sacramento Regional Wastewater Treatment Plant NPDES Permit

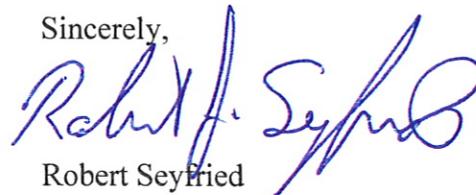
Dear Mr. Marshall:

Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to submit the attached minor comments on the tentative draft order of the second amendment to the Sacramento Regional Wastewater Treatment Plant NPDES permit.

Board of Directors
Representing:

- 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

If you have any questions regarding these comments, please feel free to contact me at seyfriedr@sacsewer.com or at 916-876-6068.

Sincerely,


Robert Seyfried
Senior Civil Engineer
Policy and Planning Department

Attachment: 1. SRCSD Comments on Tentative Draft

cc: Kathleen Harder, CVRWQCB
Paul Simmons, Sommach Simmons & Dunn
Prabhakar Somavarapu
Christoph Dobson
David Ocenosak
✓Vyomini Pandya

- Stan Dean
District Engineer
- Ruben Robles
Director of Operations
- Prabhakar Somavarapu
Director of Policy & Planning
- Karen Stoyanowski
Director of Internal Services
- Joseph Maestretti
Chief Financial Officer
- Claudia Goss
Public Affairs Manager

Sacramento Regional County Sanitation District's Comments on the Tentative Draft Order R5-2013-XXX and Attachments 1 and 2 of the Sacramento Regional Wastewater Treatment Plant NPDES Permit

Comments on the R5-2013-XXXX

None

Comments on Attachment 1 Underlined/Strikeout Version of the Order No. R5-2010-0114-02

1. Pg- 17, footnote 1. The court's stay orders have not affected the compliance dates for chlorine residual; thus the deadline for chlorine residual is as stated in the original permit.
2. Pg-34, Section VI.C7.a (Title 22 Compliance Schedule) recommended insert in red for clarification.

Current Draft Permit language:

Progress Reports ~~1 February~~ 9 July 2014, annually, after approval of work plan until final compliance

Recommended Insert:

Progress Reports ~~1 February~~ 9 July 2014, annually thereafter, after approval of work plan until final compliance

3. Pg-35, Section VI.C7.b (Final Limits for Ammonia) has incorrect dates for when Progress Reports are due.

Current Draft Permit language:

Progress Reports ~~1 February~~ 9 July 2014, annually, after approval of work plan until final compliance

Recommended Changes in red:

Progress Reports ~~1 February~~ 13 July 2014, annually, after approval of work plan until final compliance

Please note that since both progress reports are due so close together, SRCSD expects to submit a combined report to meet both requirements. Please advise us if there is any concern or need to address this in the permit itself.

4. Pg- E 14, Table E-6 B – Footnote 4 was deleted. It should be reinserted.
5. Pg-E-21, Table E-9 corrections are shown below in red:

Special Provision	Reporting Requirements
Pollution Prevention Plan for mercury Annual Report (Section VI.C.3.a)	1 February , annually, after approval of updated pollution prevention plan
Title 22 Disinfection Requirements (Section	1 February <u>July 9, 2014</u> , annually

VI.C.7.a)	<u>thereafter</u> , until final compliance
Salinity Evaluation and Minimization Plan Annual Report (Section VI.C.3.b)	1 February , annually, after approval of plan
Compliance Schedules for Final Effluent Limitations for ammonia, compliance with final effluent limitations. (Section VI.C.7.b)	1 February July 13 , annually, until final compliance

6. Pg- F 63, item vi.(c) Chlorodibromomethane – Please remove the text shown as stricken below, as we do not have data from full scale implementation. Removing this text will make the edits more consistent with Finding 7 of R5-2013-XXXX and footnote 8 on page 105 of Order R5-2010-0114-2.

“Based on data collected from the Discharger’s pilot test of small scale new treatment facilities and including a 40% process scale up factor to take into consideration uncertainties and variability ~~and the potential need for further adjustment based on full scale implementation~~, an additional performance based effluent limitation is calculated that will apply when the discharge includes effluent from the ammonia and nitrate removal wastewater system.”

7. Pg- F 64, item vii.(c) Dichlorobromomethane – Please remove the text shown as stricken below, as we do not have data from full scale implementation. Removing this text will make the edits more consistent with Finding 7 of R5-2013-XXXX and footnote 8 on page 105 of Order R5-2010-0114-2.

“Based on data collected from the Discharger’s pilot test of small scale new treatment facilities and including a 40% process scale up factor to take into consideration uncertainties and variability ~~and the potential need for further adjustment based on full scale implementation~~, an additional performance based effluent limitation is calculated that will apply when the discharge includes effluent from the ammonia and nitrate removal wastewater system.”

Comments on Attachment 2 Underlined/Strikeout Version of the Order No. R5-2010-0115-02

None