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October 8, 2010

Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

ATTN: Kathleen Cole Harder

Subject: SRCSD NPDES Permit

Dear Ms. Harder,

This letter is written to provide commentary on the Draft NPDES Permit, issued to the Sacramento Regional County Sanitation District (SRCSD), on September 3, 2010.

Though I serve on the Folsom City Council and represent Folsom on the SRCSD Board, currently as Vice Chair, my commentary is largely on the technical side, and based upon my education and experiences as a licensed Civil Engineer.

The Draft Permit requires significant additional treatment for removal of ammonia, de-nitrification, cryptosporidium, giardia and numerous other discharges that are either not currently regulated by existing water quality standards or are required to be reduced to previously unseen levels. The installation of the additional treatment facilities are currently estimated by SRCSD Staff at approximately \$2 Billion dollars, and that does not account for the ongoing operations and maintenance of those facilities and processes.

Though SRCSD would agree that removal of some of the ammonia would be prudent, there is no scientific basis for removal of ammonia to the extent required in the Draft Permit. With regard to cryptosporidium and giardia, the requirements of the permit are an attempt to solve a problem that does not currently exist upstream or downstream of the plant.



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The requirements in the Draft Permit are not warranted and should be revised to reflect current science and sound engineering principals. The revision of the permit should also include consideration of the economic impacts to the Sacramento Region, as the CVRWQCB is required to do in their analysis.

Sincerely,

A handwritten signature in black ink that reads "Kerri M. Howell". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Kerri M. Howell, PE