

From: Kathleen Harder
To: Bennett, Bob
Date: 10/8/2010 10:30 AM
Subject: Re: Proposed Sacramento Wastewater Permit

Mr. Bennett

I received your emailed comments and will include them in our record. Once all the comments on the tentative NPDES permit for the Sacramento Regional County Sanitation District have been received and reviewed, our office will respond in writing.

Thank you Kathy

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>>> Bob Bennett <BBennett@Silgancontainers.com> 10/8/2010 10:27 AM >>>
Dear Sirs,

Silgan Can Company has a food can manufacturing facility, which discharges process waters to the SRCSD...

We have reviewed the requirements of the SRCSD Draft permit and have some comments.

It is not clear that risk reward cost benefit has been satisfied. There needs to be specific scientific cause and effect, identifying what will or will not happen.

There is also a question as to the viability of the treatment technologies.

Two of the techniques are generally used for drinking water treatment, namely micro filtration and ultra violet radiation. Why are we treating wastewater like drinking water? Not only is there a high initial investment cost in equipment, but there is an ongoing operating cost, which will be substantial. UV systems require constant cleaning to assure energy transmission, and replacement of filters and UV appliances will need to occur regularly. Both of these processes are very energy intensive, Electrical use for operating the UV systems and the various pumps required to push the water through the filters will add to the regions high energy demands and contribute to increased generation of greenhouse gasses.

Has the environmental impact of building and operating the new equipment and processes been compared to the alleged risks the systems are proposing to treat been weighed.

With the proposed use of technologies normally used for drinking water treatment, one cannot help but wonder if the assertion, made by the Sacramento Bee, that the proposed treatment is being required to satisfy water use interests in Southern California, may well be driving some of the new requirements.

While we understand the desire to require improvements when a permit is open for renewal, the scope and scale of the proposed requirements is clearly excessive and not supported by existing beneficial use of the Sacramento River.

Bob Bennett

Environmental Engineer

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