

From: "Rick Bettis " [REDACTED]
To: "Kathleen Cole Harder" <kharder@waterboards.ca.gov>
Date: 10/8/2010 3:31 PM
Subject: Tentative Waste discharge permit Requirements NPDES No. CA0077682 for SRCSD

Via e-mail

Kathleen Harder
Regional Water Quality control board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, Ca. 95670-6114

Subject; Tentative Waste discharge Permit Requirements
NPDES No Ca0077682 for Sacramento Regional County Sanitation District

Dear Ms Harder,

This is to express my concerns regarding what appears to be overly restrictive and not scientifically substantiated requirements for the subject Permit.

I am writing as an individual. However for identification purposes I am retired Professional civil Engineer and a Water Resources Consulting Engineer. I am currently serving in the following relevant capacities; Board member Central Sacramento county groundwater Authority, Stakeholder Member Sacramento Regional Water Forum, Citizen Advisory Group for Aerojet Toxic Groundwater Remediation Program, Stakeholder Committee SRCSD Water Recycling Program, and natural Resources Director for the League of Women Voters of Sacramento County.

The tentative permit requirements appear to be based on overly conservative and unsubstantiated assumptions such as a statement on page 72 that states "the strongest disinfection criteria of title 22 are appropriate since the undiluted effluent may be used for irrigation of food crops. and/or for body-contact recreation>" this does not appear to be based on realistic analyses of hydrology and flow conditions in the Sacramento River or the current accepted pathogen risk criteria of the USEPA.

I also believe that the ammonia limitations are overly restrictive based on the current accepted state of the art with regard monitoring and determination of impacts due to ammonia. It also appears unreasonable to impose a very costly unfounded mandate on the SRCSD if similar restrictions are not imposed on other ammonia sources such as non-point source discharges from urban and agricultural lands.

I urge the Board to reconsider the proposed restrictions and conduct additional peer reviewed technical studies and consider the potential substantial unintended economic impacts of these requirements.

Thank you for your consideration.

Sincerely,
Rick Bettis

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