



FAX
(925) 625-0169

IRONHOUSE SANITARY DISTRICT
450 Walnut Meadows Drive • P.O. Box 1105 • Oakley, CA 94561

Telephone
(925) 625-2279

Via Electronic Mail

October 5, 2010

Kathleen Harder
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114
kharder@waterboards.ca.gov

**Subject: Tentative Waste Discharge Requirements Renewal (NPDES No. CA0077682)
for Sacramento Regional County Sanitation District and Sacramento Regional
Wastewater Treatment Plan, Sacramento County**

Dear Ms. Harder:

Thank you for the opportunity to provide comments on the proposed permit renewal for the Sacramento Regional County Sanitation District (SRCSD). On behalf of Ironhouse Sanitary District (ISD), I am writing regarding the presentation of tertiary treatment costs in the Tentative Order. (Fact Sheet at F-92-F-93).

ISD is one of the agencies included in Table F18. In a column headed "tertiary conversion costs" the table lists ISD's cost as \$54.5 million. Though the introductory language on page F-92 acknowledges that some of the costs estimates referenced may include more than simply tertiary upgrades, the table itself does not distinguish these facilities or otherwise explain the factors and assumptions that underlie the cost estimates. In ISD's case, the \$54.5 million is the total cost of constructing an entirely new treatment facility along with major influent and effluent piping and new river outfall to meet all permit requirements for a new surface water discharge—not an incremental cost for upgrading an existing secondary treatment facility to tertiary. There is concern that listing this cost figure in a column headed "tertiary conversion costs" is misleading and may result in "apples to oranges" comparisons. Therefore, ISD recommends that the table either be revised to include relevant facts to place the costs in context or deleted from the Fact Sheet.

Thank you for your consideration of our comments.

Sincerely,

Jennifer Skrel

District Engineer