

John Killey



October 6, 2010

Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Dr., Suite #200
Rancho Cordova, CA 95670
Attn: Kathleen Cole Harder

Dear Ms Harder:

Subject: Permit Recommendations for SRCSD

I am writing to you to express my outrage and strong opposition to the proposed NPDES permit for the Sacramento Regional Sanitation District's wastewater treatment plant.

I have reviewed several technical documents both expressly related to this issue and several over the years concerning all-round surface water characteristics in the Central Valley. I find there is not reasonable scientific reason for you to impose these proposed limits.

In the Memorandum *Comments for Consideration by the State Water Resources Control Board Regarding the Scientific Article Long-Term Changes ... (authored by Patricia Gilbert)* memo prepared by Larry Walker & Associates (July 29, 2010) I read with interest the discussion on CUSUM's. I have utilized this statistical technique before in my career and found the same concerns as did the memo's author, the approach and interpretation by the user are misguided. This technique is now not a commonly used one probably because its interpretation requires an understanding of statistics and does not just deliver a clearly understood result. As so often in the past, the user of the CUSUM's has not correctly understood and interpreted the results and consequently delivered the wrong conclusions. I agree with the memo's author, the statistical understanding is flawed. I also agree that the scientific interpretations are questionable.

The Ratepayer Impacts information suggests that the costs to the public will increase by three times; this estimate was explained to me by SRCSD as only the operating costs of the extended processes and did not account for recovery of capital investments. This is

completely unacceptable. One might argue that the estimates are weighted but given that it is a public agency spending the money, cost over-runs (and not under-runs) are the norm. We have recently seen gross increases in POTW fees in Placerville caused by more stringent regulatory requirements. I urge you not to impose such outrageous burdens on the customers of greater Sacramento and around.

SRCSO asserts they comply with the current NPDES permit and states that their effluent cannot result in fish mortality in the Sacramento River, as demonstrated by on-going bio assay laboratory testing. This is factual information. Clearly, the issues of bio-viability in the River and Delta are complex; the single issue of ammonia therein is itself not well understood. Attempting to regulate further the effluent from SRCSO, a well demonstrated good actor in the system, is a cheap shot at a single source with untenable financial consequences for a large population base without the mechanism to object. Even the Sacramento Bee is ambivalent about the proposal.

I urge and insist that you stop this uncontrolled behavior and turn your focus to serving the people of California. In the current times when the average person is facing economic hardships at diverse levels and the State is near bankrupt, I find your actions to be unreasonable, outrageous, downright disgraceful and overstepping your authority. I can only conclude that this is another attempt by power-holder bureaucrats to force their own agendas on the public via bullying others.

Sincerely

John Killey, R.E.A.