

KCH



Environmental Utilities
Administration
2005 Hilltop Circle
Roseville, California 95747

RECEIVED
SACRAMENTO
CVRWQCB

10 SEP 23 PM 2:07

September 22, 2010

Ms. Kathy Harder
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

SUBJECT: Tentative Order (TO) for Sacramento Regional Sanitation District, Sacramento Regional Wastewater Treatment Plant, Sacramento County, (NPDES Permit No. CA0077682)

Dear Ms. Harder:

The City of Roseville appreciates the opportunity to comment on the subject TO. While there are many issues to address between the discharger and the CVRWQCB, at this time, the City is limiting our comments to Table F-18.

The City strongly objects to any reference in Table F-18 to the City-owned and operated Dry Creek and Pleasant Grove Wastewater Treatment Plants (DCWWTP and PGWWTP). The footnote on Table F-18 indicates that these data came from a "Telephone Survey by Elizabeth Lee, CVRWQCB". While the City concurs that Ms. Lee spoke to Mr. O'Brien about tertiary treatment at both DCWWTP and PGWWTP, the information presented in Table F-18 does not reflect the conversation between Mr. O'Brien and Ms. Lee. Mr. O'Brien informed Ms. Lee that he did not have a breakdown of just the tertiary treatment upgrades at each plant. Mr. O'Brien continued to inform Ms. Lee that tertiary treatment was a requirement of the *Roseville Regional Wastewater Service Area Master Plan EIR, 1996*. Also, tertiary treatment was included at the DCWWTP during the 1980's and 1990's era expansions. Furthermore, Ms. Lee did not inform Mr. O'Brien that her inquiry was to be used in the fact sheet in the subject TO. Mr. O'Brien understood that Ms. Lee was gathering general information only.

Based on our concern and specific knowledge of the City's WWTPs, we question the need and efficacy of Table F-18 in its entirety. We suspect that all these data may not reflect the true cost for tertiary upgrades. This is often a difficult cost to excerpt from other costs and often not fully broken out in the manner needed to develop this table.

In summary, we request that all references to the City of Roseville in Table F-18 be removed and we strongly recommend that this table be deleted in its entirety.

Sincerely,

Art O'Brien
Wastewater Utility Manager