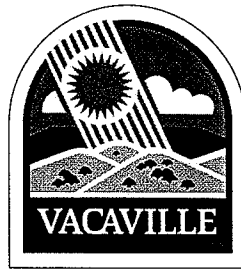


COUNCIL MEMBERS
LEN AUGUSTINE, Mayor
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PAULINE CLANCY
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RON ROWLETT



CITY OF VACAVILLE

650 MERCHANT STREET, VACAVILLE, CALIFORNIA 95688-6908

October 8, 2010

ESTABLISHED 1850

Kathleen Harder
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

**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 the City of Vacaville, I am writing regarding the presentation of tertiary treatment costs in the Tentative Order. (Fact Sheet at F-92 and F-93).

The City of Vacaville is included in Table F-18, which shows the costs identified as "tertiary conversion" at the various treatment plants listed. The \$150 million cost identified for the City of Vacaville is the permit compliance cost for *all* plant upgrades—including tertiary filtration, denitrification, elimination of bypass (including construction of storage), and demolition of outdated facilities. The City considers these costs (which result in minimal Delta water quality benefit) to be extraordinary and is very concerned about the impacts of the subsequent rate increases on our rate payers. Additionally, the City and our rate payers are currently obligated to pay for these State mandates without financial assistance from the State.

In summary, we believe including these costs in a table under the heading "tertiary conversion" is inaccurate. It appears that for Vacaville, the table is reflective of new permit compliance costs and should be revised to reflect that.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Tompkins", is written over the typed name.

David K. Tompkins, P.E.
Director of Utilities

Ec: Laura Kuhn, City Manager
Vicki Shidell, Water Quality Manager

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