



**COUNTY OF PLACER
FACILITY SERVICES DEPARTMENT**

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April 22, 2013

Central Valley Regional Water Quality Control Board
NPDES – Sacramento Watershed Unit
Attn: Gayleen Perreira
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

**RE: COMMENTS REGARDING TENTATIVE DRAFT ORDER FOR
PLACER COUNTY SEWER MAINTENANCE DISTRICT 3 WASTEWATER
TREATMENT PLANT, NPDES CA0079367**

Dear Ms. Perreira:

Thank you for the opportunity to submit comments regarding the Tentative Draft Waste Discharge Requirements (WDR) for the Placer County Sewer Maintenance District 3 (SMD 3) Wastewater Treatment Plant (WWTP) hereinafter referred to as the Tentative WDR. We appreciate the time and effort that you and your staff have devoted to developing the Tentative WDR, and are hopeful that we will be able to work through the County's remaining comments below, prior to adoption of the Final WDR:

1. Hardness

Attachment E – Monitoring and Reporting Program (MRP)

Page E-5, Effluent Monitoring Requirements (IV)

Table E-3, Effluent Monitoring

Page E-10, Receiving Water Monitoring Requirements – Surface Water and Groundwater (VIII)

Table E-5, Receiving Water Monitoring Requirements

Table E-3 requires monthly effluent monitoring for hardness, and Table E-5 requires monthly receiving water monitoring for hardness at locations RSW-001 and RSW-002. These tables also require monitoring for "priority pollutants and other constituents of concern" in accordance with Attachment I of the Tentative WDRs.

Attachment I requires quarterly monitoring for one year during the third year of the permit, and this monitoring specifically includes effluent/receiving water monitoring for pH and hardness *"to evaluate the toxicity of certain priority pollutants (such as heavy metals) where the toxicity of the constituents varies with pH and/or hardness."*

Hardness data is not needed for compliance purposes, and is only needed to determine appropriate hardness-dependent metals criteria during the reasonable potential analysis process that would be performed during future permit renewal processes. Because the

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Entrance at 2855 2nd Street

Administration – Building Maintenance – Capital Improvements – Museums – Parks
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County is in the process of completing the regionalization project, a subsequent permit renewal process for the WWTP is not anticipated, and should the permit be reopened or renewed, sufficient hardness data will be collected per the requirements of Attachment I.

For these reasons, the County requests that the requirement to collect monthly effluent and receiving water hardness data be removed from the permit.

2. Authorized Signatory

Attachment F – Fact Sheet

Page F-3, Permit Information (I), Table F-1. Facility Information

Due to staff changes at the County, the authorized person listed in Table F-1 should be modified as follows “Authorized Person to Sign and Submit Reports: Mr. William Zimmerman, Deputy Director, Facility Services Department, (530) 886-4986”

The County continues to make progress toward regionalization of the SMD 3 sewer system and abandonment of the WWTP to achieve full compliance with the final effluent limitations. On November 20, 2012, the County Board of Supervisors approved the Project Plans and Specifications, certified the Environmental Assessment (EA) / Environmental Impact Report (EIR) and authorized County staff to solicit bids. On November 30, 2012, the County submitted the *Project Bid Report* showing the project had gone out to bid and the schedule for award. On December 30, 2012 the County submitted documentation that the City of Roseville has formally agreed to accept the wastewater generated at SMD 3.

Most recently, the Placer County Board of Supervisors approved the Regionalization Financing Plan and awarded the construction contract at their April 9, 2013 meeting; the contract was executed on April 15, 2013 with a Notice to Proceed date of April 29, 2013. With anticipated completion by December 2014. The County submitted a detailed update in its April 19, 2013 Project Initiation Report.

Again, the County appreciates the Regional Board's support of the SMD 3 regionalization project in the preparation of this permit. If you have any questions or concerns please contact Kevin Bell of my staff at (530) 886-4915.

Sincerely,

Handwritten signature of Kevin Bell in cursive, with the word "for" written in smaller cursive to the right of the signature.

Bill Zimmerman, P.E.

Deputy Director

BZ/KB/CH

cc: Kathryn Gies, West Yost Associates
Tess Dunham, Somach Simmons and Dunn