



# Delta Diablo Sanitation District

OFFICE AND TREATMENT PLANT: 2500 PITTSBURG-ANTIOCH HIGHWAY, ANTIOCH, CA 94509-1373

TEL.: (925) 756-1900 ADMIN. FAX: (925) 756-1961 MAINT. FAX: (925) 756-1963 OPER. FAX: (925) 756-1962 TECH. SVCS. FAX: (925) 756-1960  
www.ddsd.org

October 8, 2010

VIA ELECTRONIC MAIL ([kharder@waterboards.ca.gov](mailto:kharder@waterboards.ca.gov)) & U.S. MAIL

Ms. Kathy 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, SACRAMENTO REGIONAL WASTEWATER TREATMENT PLANT, SACRAMENTO COUNTY

Dear Ms. Harder:

Delta Diablo Sanitation District (the District) appreciates the opportunity to provide comments on the Regional Water Quality Control Board's (Regional Water Board's) tentative waste discharge requirements and tentative time schedule order (Tentative Orders) for the Sacramento Regional County Sanitation District's (SRCSD) Regional Wastewater Treatment Plant.

The District is concerned because of several potential precedent setting issues in SRCSD's Tentative Orders. These issues could have significant implications for all California publicly owned treatment works (POTWs).

- **Title 22 Treatment Standards to Protect Recreational Beneficial Uses**  
The requirement for SRCSD to treat its wastewater to Title 22 standards for total coliform is unprecedented and lacks adequate findings or rationale. It has not been demonstrated that the current Basin Plan water quality objectives for total coliform are insufficient for protecting recreational water contact beneficial uses. Meeting Title 22 standards would require significant capital and operating costs with unknown and possibly little environmental benefit.
- **Denial of Mixing Zones/Dilution Credit**  
While regional water boards have the discretion in determining the amount of dilution credit to be allowed, the Regional Water Board's denial of a mixing zone does not have a defensible basis for the limitation. The State Implementation of Toxic Standards in Inland Surface Water, Enclosed Bays and Estuaries is intended to establish statewide consistency for permitting and dilution credits have been granted to other dischargers for ammonia and other non-bioaccumulative pollutants.

The District also supports and incorporates by reference, the comments submitted by the California Association of Sanitation Agencies/Tri-TAC, and the Bay Area Clean Water Agencies.

Ms. Kathy Harder

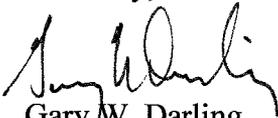
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Thank you for the opportunity to comment. The District, like the Regional Water Board, believes that the Delta is an important resource for the State of California to protect and restore. The Delta is a complex waterbody with numerous stressors affecting its well being. As is becoming more and more evident, the environment is extremely interconnected and all of the different stressors should be studied and well understood. Decisions about water quality should not be made in isolation but should consider other factors such as water supply, energy use, and greenhouse gas emissions. The District requests that the Regional Water Board reconsider the above mentioned requirements in the Tentative Orders to develop integrated solutions that are based on sound science.

Sincerely,



Gary W. Darling  
General Manager

AWR/DFL:awr

cc: District File CORP.15.03-CORRES-XX  
Chron File