



Sacramento Regional County Sanitation District

Informational Packet on the SRCSD Tentative Discharge Permit*

*Issued by the Central Valley Regional
Water Quality Control Board

Key Outcomes of Draft Permit and Costs

The Draft Permit, as currently written, would require SRCSD to construct new facilities at the Sacramento Regional Wastewater Treatment Plant to provide the following new advanced treatment capabilities:

Nitrification - CONSTRUCTION COST: \$582 million

Process: Nitrification refers to the biological oxidation of ammonia with oxygen into nitrate.

Reason for New Requirement: To remove essentially all ammonia from the discharge based on a variety of possible ecological impacts on the Delta.

1. Denitrification - CONSTRUCTION COST: \$200 million

Process: Denitrification refers to the process of removing nitrate from the wastewater.

Reason for New Requirement: To remove essentially all nitrogen from the discharge and reduce the amount of this nutrient entering the Delta based on concerns over excessive algae growth.

2. Microfiltration - CONSTRUCTION COST: \$1.16 billion

Process: Microfiltration is a type of filter technology used in wastewater treatment plants which removes very small particles and pathogens from the treated effluent.

Reason for New Requirement: To reduce the risk of infection from pathogens in the river and to remove some additional contaminants of concern.

3. UV Disinfection - CONSTRUCTION COST: \$116 million

Process: Ultraviolet light inactivates microorganisms including pathogens.

Reason for New Requirement: To replace chlorination as the method for removing pathogens from the treated effluent. UV disinfection can be more effective at removing certain pathogens than chlorine, and it produces fewer disinfection by-products.

**TOTAL COST FOR ALL FOUR PROCESSES:
\$2.06 BILLION**

Examples of Future Rates/Fees

Process Description	Total Project Costs	Annual Operating Cost	Monthly Residential Charge for Wastewater Treatment		Impact Fees per household (or equivalent)			
			Current	Future	Infill		New	
					Current	Future	Current	Future
Nitrification, Denitrification, Microfiltration, and UV Disinfection	\$2.06 billion	\$77 million	\$20.00*	\$61.75	\$ 2,800	\$13,000	\$7,450	\$35,000

* This \$20 does not include a separate charge for local sewer collection. For Sacramento Area Sewer District, that amount is currently \$19.85 per month.

How would this affect local ratepayers and businesses?

Monthly Customer Rates:

- Single Family Home monthly rate would go from **\$20.00*** to **\$61.75**
- Multi-Family (i.e. apartments) monthly rate would go from **\$15.00*** to **\$46.31**

* This amount does not include a separate charge for local sewer collection. For Sacramento Area Sewer District, that amount is currently \$19.85 per month per single family home.

Examples of SRCSD Impact Fees Charged to New Development: (sometimes referred to as "hookup" fees):

- A typical new "dine-in" restaurant (charged at 2 ESDs per 1,000 square feet) impact fee would increase from \$14,900 to **\$70,000 per 1,000 square feet.**
- A new bar establishment impact fee would increase from \$5,250 to **\$24,500 per 1,000 square feet.**
- A new dry cleaner impact fee would go from \$12,665 to **\$59,500 per 1,000 square feet.**

Comment Period and Hearing Details

Public Comment Period: NOW THROUGH October 8, 2010

Persons wishing to comment on this hearing item must submit testimony, evidence, and/or comments in writing to:

WHO: Central Valley Regional Water Quality Control Board
DEADLINE: 5:00 p.m., October 8, 2010

ALL PARTIES WITH AN INTEREST IN THIS, EITHER IN TECHNICAL COMMENTS OR CONCERNS ABOUT ECONOMIC IMPACTS, SHOULD WRITE.

Public Hearing

All designated parties and interested persons may speak at the Central Valley Water Board meeting, and are expected to orally summarize their written submittals. Oral testimony and cross examination will be limited in time by the Central Valley Water Board Chair.

A public hearing concerning this matter will be held during the Central Valley Water Board meeting, which is scheduled for:

DATE: December 8, 9, 10, 2010
TIME: 8:30 a.m.
PLACE: Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Dr., Suite #200, Rancho Cordova, CA 95670

**PUBLIC TESTIMONY IS ALLOWED BEFORE THE REGIONAL BOARD.
PERSONS OR ORGANIZATIONS WITH A VESTED INTEREST IN
RATEPAYER IMPACTS AND THE ECONOMIC VITALITY OF THE
SACRAMENTO REGION SHOULD ATTEND AND TESTIFY.**

Costs v. Benefits of Proposed SRCSD Permit Mandates

The permit for SRCSD’s wastewater treatment facility is now up for renewal with the Central Valley Regional Water Quality Control Board (Regional Board). In early September 2010 the Regional Board issued a Tentative (Draft) Permit that recommends the Sacramento region pay up to \$2 billion for additional treatment processes at the wastewater treatment facility – even though the Regional Board cannot make a clear and compelling case that demonstrates real environmental benefits to justify this significant financial burden.

As demonstrated by our 99.9% compliance rate and \$20 million investment in environmental efforts over the past decade, SRCSD is committed to protecting the Sacramento River. However, we also have a responsibility to our ratepayers to demand regulatory actions proven to be necessary, reasonable and based on sound and compelling science, as the Clean Water Act and California Water Code dictate.

Comparison of Costs and Benefits of Implementing Regional Board’s Recommendations				
	<i>Nitrification</i>	<i>Denitrification</i>	<i>Microfiltration</i>	<i>UV Disinfection</i>
Purpose of proposed treatment per draft permit	To remove essentially all ammonia from discharge.	To remove nitrates that result from the nitrification treatment process.	To reduce risk of infection from pathogens in the river and remove other small particles.	To replace chlorination for removing pathogens from the treated effluent.
Additional cost to Sacramento region	\$582 million	\$200 million	\$1.16 billion	\$116 million
Demonstrated environmental benefits?	Science supports & SRCSD acknowledges need to reduce a portion of the current ammonia loading to prevent any possibility for future low oxygen conditions in river. Despite concerns, no scientific consensus exists that ammonia is significantly harming Delta fish ecosystem or food web.	Despite concerns, no scientific consensus exists that nitrate is significantly harming Delta fish or the Delta ecosystem and food web.	No demonstration of public safety risk exists that must be “fixed” with tougher standards. Proposed risk threshold is not used in any other recreational area in CA, including So. California beaches. Public pools present greater risk than Sacramento River.	Risk levels in Sacramento river already meet national USEPA criteria for bathing beaches. No clear scientific consensus that conditions in the Delta would be significantly improved.
Weakness of Regional Board rationale	Examples that Regional Board acknowledges science is inconclusive: – “the overall impact of the nitrogen uptake inhibition, particularly on Delta smelt food, is not understood;” – “ <i>scientists...have not reached a consensus</i> on whether ammonia is either inhibiting diatom production or shifting algal communities.”	Concern by Regional Board that nutrient imbalance (nitrate, phosphorous, ammonia) may cause problems in the Delta ecosystem. However, Regional Board acknowledges that “adverse impacts from changed nitrogen:phosphorus ratios in the Delta have not been demonstrated.”	Based on uncertain risk assessment using unprecedented risk standards. The Regional Board even states that “refinement of the pathogen risk study <i>may conclude that there is no increase in risk of infection or illness</i> from the current level of wastewater treatment.”	Regional Board recommendations imply they cannot tolerate any increase in risk from pathogens, no matter the magnitude. This is without precedent, is not reasonable and will not produce a meaningful benefit.
Is this necessary and reasonable?	Partially	No	No	No

Potential Sacramento Rate Increases

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Fact v. fiction

The controversy around SRCSD's permit arises from the fact that the Sacramento River is part of the Sacramento-San Joaquin Delta estuary, an important water and habitat resource for the entire state – and the subject of intense policy debate in recent years. The stakes are high in the Delta policy debate and water supplies for southern parts of the state are at risk since their pumps have been determined by the SWRCB and federal fisheries agencies to be a major cause of the Delta's decline. This is why, as a September 8, 2010, Sacramento Bee editorial pointed out, that "water agencies in Southern California and the San Joaquin Valley have attempted to make Sacramento's ammonia discharges the sole culprit in the (Delta's) ongoing decline." The editorial goes on to say these entities "have played fast and loose with the facts and science of the Delta." To get the facts about SRCSD's operations and proven Delta impacts visit www.sacdeltasolutions.com.

About SRCSD and its current treatment process

SRCSD provides wastewater treatment for neighborhoods, businesses, industry, schools, hospitals and other commercial operations in the urbanized areas of Sacramento County and the cities of Sacramento, West Sacramento, Citrus Heights, Rancho Cordova, Elk Grove and Folsom. In operation for nearly 35 years, SRCSD meets or exceeds all state and federal regulatory standards and mandates, and boasts a strong compliance record of 99.9%.

SRCSD's secondary treatment process adequately protects beneficial uses of the Delta and is similar to those used in other major communities like Los Angeles, Orange County, San Francisco, Oakland, Contra Costa County and the East Bay communities. Water treatment requirements and effluent limits in California – and throughout the U.S. – are based on the effluent's impact on and proportional volume in the receiving water. Simply put, the regulations are geared to provide levels that are safe for the fish and other organisms and ensure full compliance with the Clean Water Act and California Water Code.

For instance, San Diego only provides primary treatment because its effluent flows into the ocean and is a very small portion of the ultimate mixture. Conversely, advanced treatment is necessary for facilities whose effluent dominates the receiving water, such as the City of San Jose. This is not the case for SRCSD since the Sacramento River is the largest river in California and SRCSD's discharge is a relatively small percentage of the total volume of the river - often constituting only 1% – 2%.