

January 8, 2009

Mr. Tom Skjelstad
General Manager
Donner Summit Public Utility District
PO Box 610
Soda Springs, CA 95728

Re: Review of "Letter to SLCWD Board of Directors from Mr. Joe Gray"

Dear Mr. Skjelstad:

Thank you for providing me a copy of "Letter to the SLCWD Board of Directors from Mr. Joe Gray" dated January 6, 2009 for review. I am writing to correct some potential misunderstandings regarding the availability and application of dilution credits.

In the letter, the following statement was made (near the bottom of page 3):

"Based on the this data and the calculations ECO:LOGIC determined that the ratio of river flow to discharge is 24:1. By regulation and policy a dilution ratio of 20:1 is mandatory in order to receive credits."

All regulatory criteria tied to the "20:1" level of dilution is not by regulation. The 20:1 dilution criterion is a policy recommendation by the State of California Department of Public Health (DPH) that is limited in scope only to addressing the need for a wastewater effluent to undergo filtration and enhanced disinfection to control pathogens released into the environment. If 20:1 dilution is not always present when discharging, the DPH recommends filtration and enhanced disinfection. Filtration reduces both the concentrations of biological oxygen demand (BOD; a measure of organic strength) and total suspended solids (TSS). If 20:1 dilution were present, the typical average monthly BOD and TSS limitation would be set at 30 mg/L. The lack of 20:1 dilution results in more restrictive BOD and TSS limitations of 10 mg/L. The current treatment plant effluent is set at the more restrictive criteria typical of less than 20:1 dilution (e.g., 10 mg/L) because 20:1 dilution is not always present.

Regarding disinfection, if 20:1 dilution were always present, the typical disinfection objective would be a 7-day median most probable number of 23 total coliform bacteria per 100 mL. The lack of reliable 20:1 dilution results in the more restrictive total coliform bacteria limitation of 2.2 total coliform bacteria per 100 mL. The current treatment plant effluent is set at the more restrictive criteria typical of less than 20:1 dilution (e.g., 2.2 total coliform bacteria per 100 mL) because 20:1 dilution is not always present.

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We are not making any regulatory changes to the pathogen and/or BOD and TSS limitations that are affected by the presence of or lack of 20:1 dilution.

The regulation of nitrate, priority pollutants, or any other water quality parameter other than pathogens is unaffected by the 20:1 dilution criteria described by the DPH. As you correctly stated in your letter, each water quality objective has its own specific dilution requirements. Please let me know if you require further discussion regarding the assignment of the appropriate dilution for those constituents other than pathogens. A review is available in the documents you referred to in your response letter.

Sincerely,

ECO:LOGIC Engineering



Robert W. Emerick, Ph.D., P.E.
Principal