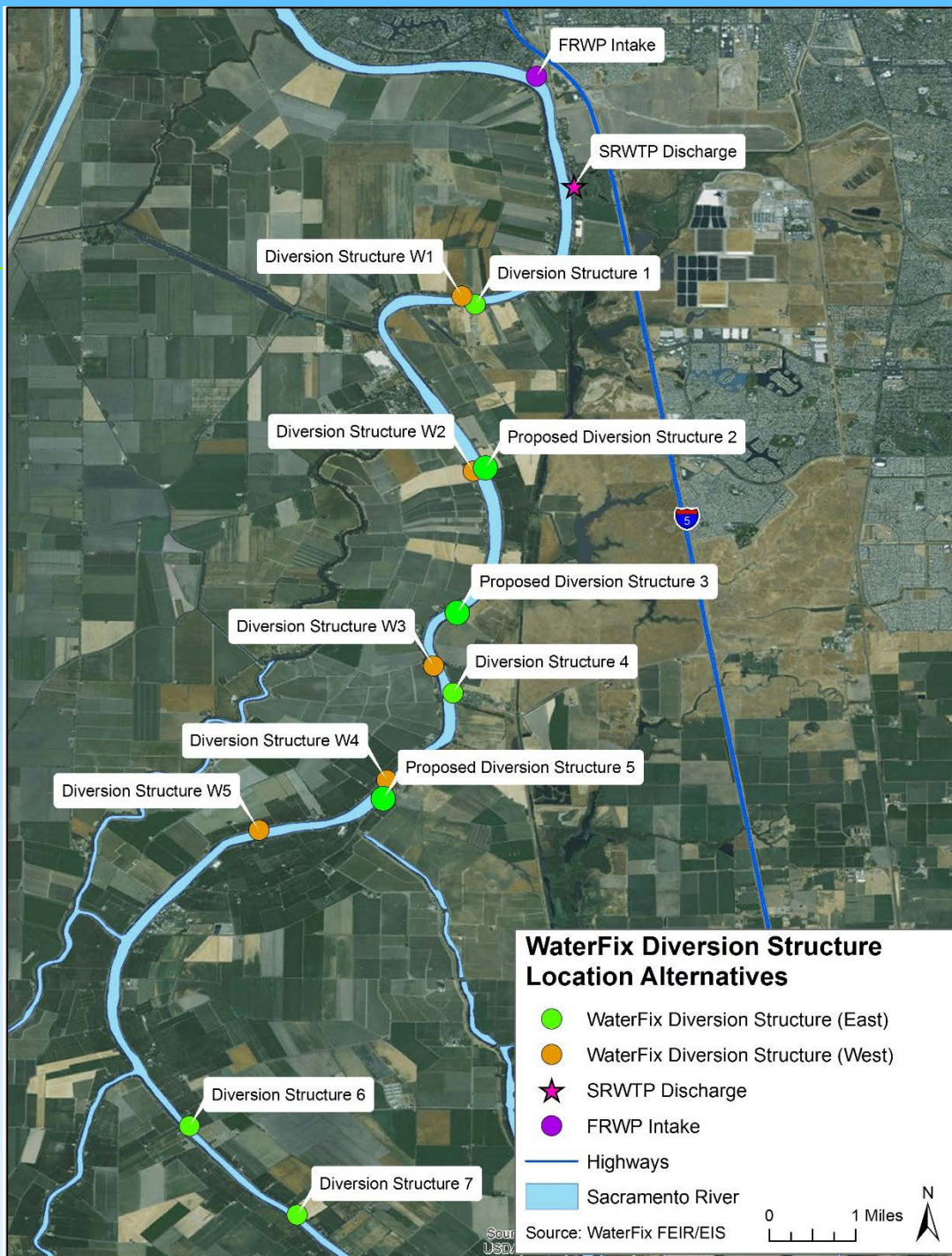
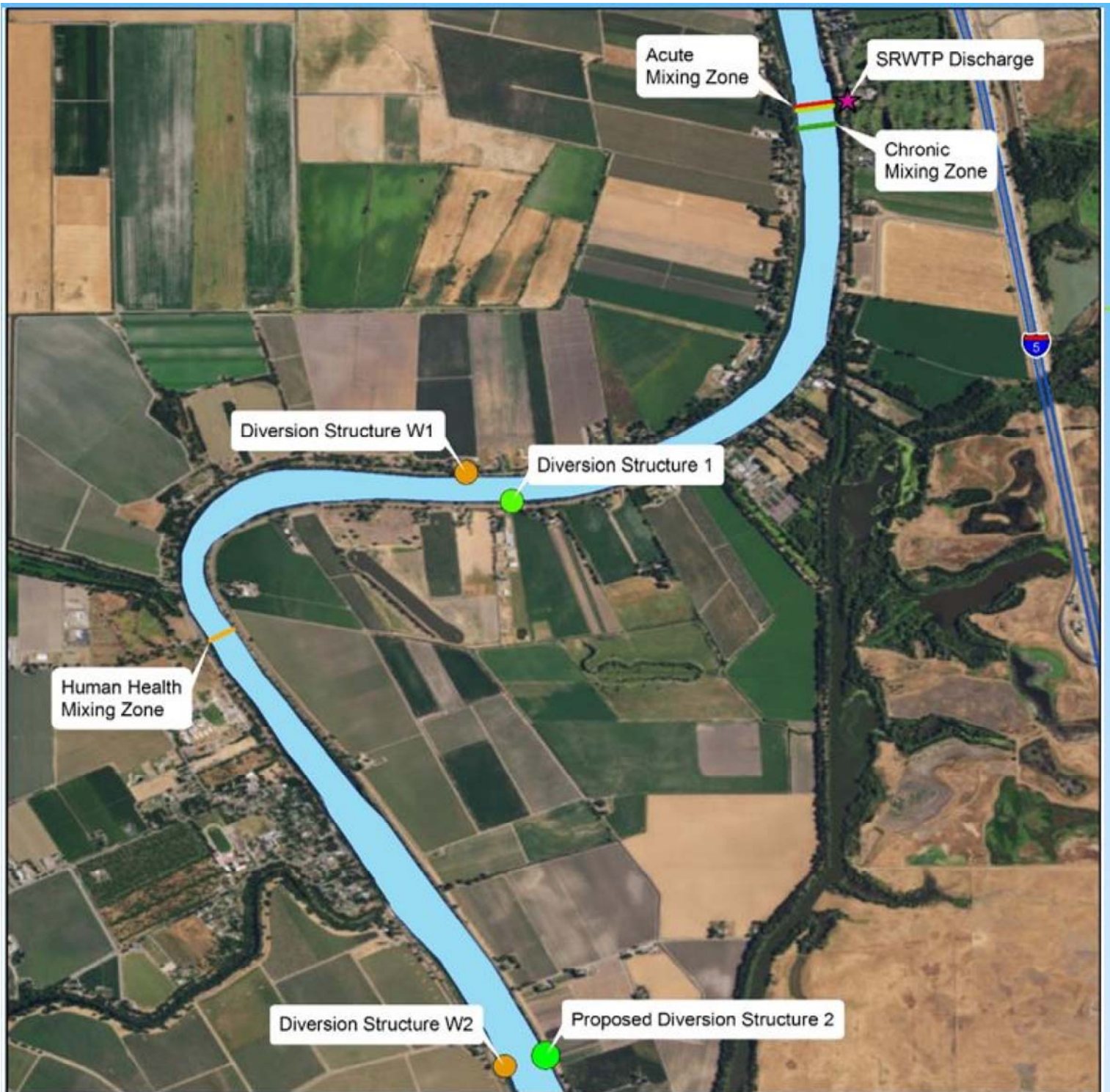


Testimony of TR Grovhoug

On behalf of SRCSD





WaterFix Diversion Structure Location Alternatives in the Vicinity of SRWTP

- | | |
|---|--|
|  SRWTP Discharge | Mixing Zones |
|  Highways |  Diffuser |
|  Sacramento River |  60 Feet Downstream (Acute) |
|  WaterFix Diversion Structure (East) |  350 Feet Downstream (Chronic) |
|  WaterFix Diversion Structure (West) |  3 Miles Downstream (Human Health) |

Source: WaterFix FEIR/EIS

0 1,250 2,500 5,000 Feet



Impacts of Proposed Diversion Structures on SRWTP NPDES Permit

Additional Treatment Requirements due to:

- Mischaracterization of Diversion Structures as Drinking Water Intakes
- Potential loss of Dilution Credit for THMs
- Potential imposition of potable reuse requirements
- Limits resulting from degradation of Delta Water Quality for EC, HABs and Macrophytes

Diversion Structures vs Drinking Water Intakes

- Point must be clarified by State Board and Petitioners that proposed structures are not drinking water intakes
- Makes a big difference to mixing zone PDES permit determinations for SRWTP discharge

Dilution Credit for Trihalomethanes

- SRWTP has dilution credit for THMs
- Resulting effluent limitations can be met by EchoWater Project
- Loss of dilution credit would result in need to convert from chlorination to ultraviolet disinfection with pre-ozonation
- \$400 million increased capital cost, increased O&M costs

Potential Confusion regarding Potable Reuse Requirements

- Point must be clarified by State Board that SRWTP discharge to Sacramento River is not somehow equivalent to either:
 - Raw water augmentation
 - Reservoir water augmentation
- Treatment requirements and Cost implications to SRWTP are significant

Impacts of Delta Water Quality Degradation associated with Water Fix Project

- Water Fix will increase EC levels and increase residence times in portions of the Delta
- Increased residence times promote HABs and macrophyte proliferation
- SRCSD and others should not be required to implement controls to address these impacts
- Petitioners should be required to participate in solutions