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CALIFORNIA MANUFACTURERS AND
TECHNOLOGY ASSOCIATION and SOLANO
COUNTY TAXPAYERS ASSOCIATION

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO

CALIFORNIA MANUFACTURERS
AND TECHNOLOGY ASSOCIATION, a
California corporation; and SOLANO
COUNTY TAXPAYERS ASSOCIATION,
a California corporation,

Petitioners,

v.

STATE WATER RESOURCES
CONTROL BOARD,

Respondent.

CASE NO. 34-2014-80001850

**DECLARATION OF TAJ DUFOUR IN
SUPPORT OF PETITIONERS'
SUPPLEMENTAL MEMORANDUM OF
POINTS AND AUTHORITIES PURSUANT
TO THE COURT'S NOVEMBER 15, 2015
ORDER**

Dept: Dept 44
Judge: Hon. Christopher E. Krueger

FILED BY FAX

I, Taj Dufour, declare as follows:

1. I am the Engineering Manager and Chief Engineer at the Soquel Creek Water District. I make this declaration of my own personal knowledge and, if called as a witness, could and would competently testify to the matters stated in this declaration.

2. I have reviewed the Declaration of Mark Bartson, in which Mr. Bartson states that

1 some public water systems have successfully installed treatment facilities to avoid violations of
2 the Chromium-6 MCL, including the Soquel Creek Water District.

3 3. In October 2014, a vendor installed a temporary demonstration treatment facility at
4 the Soquel Creek Water District's San Andreas Well. The Soquel Creek Water System has been
5 paying a rental rate of \$9,618-\$9,906 per month for this demonstration facility and has incurred
6 approximately \$275,000 in total rental charges to date.

7 4. The vendor recently informed the Soquel Creek Water District that the rental rate
8 will increase to approximately \$60,000 per month on January 1, 2018. On or before January 1,
9 2018, Soquel Creek Water District will terminate its contact with the vendor because the new
10 rental rate is too expensive.

11 5. At that point in time, Soquel Creek Water District will have no Chromium-6
12 treatment systems operating on any of its wells.

13 6. In addition to the \$275,000 in rental costs for the demonstration treatment facility
14 at the San Andreas Well, the Soquel Creek Water District has spent approximately \$3.9 million
15 on the design and phased construction of a centralized permanent treatment system to be located
16 at its Bonita Well.

17 7. In total, the Soquel Creek Water District expects to spend approximately \$9
18 million to achieve compliance with the 10 ppb Chromium-6 MCL.

19 8. In addition, Mr. Bartson states in his Declaration that there have been recent
20 developments in available treatment technologies, including evaluation of an alternative treatment
21 method that is likely to result in significant costs savings, perhaps as high as 50% in construction
22 costs. This is an apparent reference to the stannous chloride treatment technology.

23 9. Soquel Creek Water District has recently completed full scale pilot testing of this
24 technology, including filtration using filter bags.

25 10. For Soquel Creek Water District's water quality, the stannous chloride treatment
26 technology appears to only achieve a removal efficiency of approximately 50% and has very
27 significant operational costs related to filter bag or cartridge filter replacements. The Soquel
28 Creek Water District has concluded that this technology is not cost effective for its operations.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 23rd day of March 2017 at Soquel, California.


TAJ DUFOUR

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Downey Brand LLP, 621 Capitol Mall, 18th Floor, Sacramento, California 95814-4686. On March 24, 2017, I served the within document(s):

**DECLARATION OF TAJ DUFOUR IN SUPPORT OF PETITIONERS'
SUPPLEMENTAL MEMORANDUM OF POINTS AND AUTHORITIES PURSUANT
TO THE COURT'S NOVEMBER 15, 2015 ORDER**

- ☐ **BY E-MAIL:** by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.
- ☐ **BY HAND:** by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Sacramento, California addressed as set forth below.
- ☒ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

BY OVERNIGHT MAIL ONLY

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BY U.S. MAIL ONLY

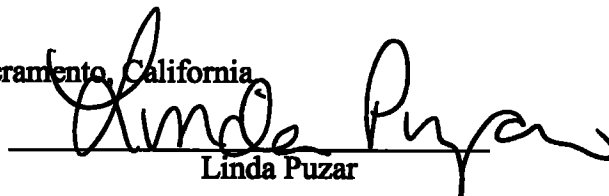
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I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on March 24, 2017, at Sacramento, California


Linda Puzar