

DAB



BEAR VALLEY COMMUNITY SERVICES DISTRICT

California Regional Water Quality Control Board
Central Valley Region
Fresno Branch Office
1685 E. Street
Fresno, CA 93706

June 9, 2008

RECEIVED

JUN 12 2008

RWQCB-CVR
FRESNO, CALIF.

Attn: Debbie Bates

We have received and read the tentative NPDES No. CA00812313

In depth or extended testing at site R-1 does not seem to make sense since as this site is upstream of our discharge point, is in an ephemeral stream that runs less than 8 weeks per year, and that has no substantive aquatic life.

Other questions with the listed testing requirements are addressed by page number.

1) Pg. E-8 -Receiving waters monitoring requirements.
Fecal coliform at R-1 and R-2 once per week during discharge to creek.

R-2 discharge is identical to E-2 (pond) which is the same as E-1 (tert. Cl2 contact chamber). So why are we testing R-2 if it's the same as E-1: where we already do Bacti's 3 times a week.

Further why are we testing R-1 at all? It is not part of our discharge and we already know it is full of coliform. A limited group of samples at this site in order to set some kind of background might make sense but I'm not convinced it will prove anything of value.

2) Pg E-5: V. A. 2 Samples at sample points E-2 and R-1—once again why are we sampling upstream of plant discharge.

We feel that the requirements as written are deficient in recognizing the historical testing results for the system. There is no purpose to annual testing of Dioxin and Asbestos in the system as they have always proved to be Non-Detect in the past and it is unlikely that this would change as there is no new source.

3) F-16 Hex-Chrome-- We submitted test results for R-1 tested 3/24/08. We resubmitted the tests because the lab and we felt the results were in error. Subsequent test results were R-1 ND & E-1 2.1 micrograms /liter. We wish to eliminate this testing requirement completely. The test result of 54 Micrograms per liter was an obvious error and appropriate steps were taken to show this.

- 4) F- 15 Since no Al3+ limit is being established and the testing is required anyway can the the testing be done in house? We are not a certified lab but have the capability of doing this test.
- 5) E-15 Copper, same question as in (40) above.
- 6) E-5 Acute Toxic Testing—We have always done tests at E-2 without problem what would be the purpose of testing at R-1, above our discharge and not under our control. What would we be expected to do if the minnows died?
- 7) E-5 If we are going to be doing Chronic Toxics testing why can't this test satisfy Acute Toxic Testing requirement?
- 8) E-9 (1) Priority pollutants, requires composite sample from bins yearly

(4) requires composite sample for bins at time of composting
One of these needs to be removed or it should be stated that they may be satisfied by the same test or tests so efforts are not needlessly duplicated.
- 9) E-5 Priority pollutants testing, once again we would like requirements for Asbestos and Dioxin testing removed as there are no past detections of either.
- 10) We do not have the capability of doing avg. 1-hour Chlorine residual and what purpose would it serve?

It seems we are adopting a lot of expensive testing in order to prove we looked for something even if we are not sure what.. The idea of testing in case something "might" be found and this thing "might" be a problem in the future, is ludicrous. The state has already set limits that we have to meet in order to "not" degrade the surface waters we discharge to. Why do we need to increase testing of those surface waters (especially upstream) in order to show they have not been degraded when we already meet the discharge requirements at the discharge point.

Clinton R. Stewart
Supt. of Public Works
Bear Valley CSD