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EAST WATER
DISTRICT**
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June 9, 2011

JUN 10 AM 11:47

Ms. Pamela Creedon
Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Re: Renewal of WDR NPDES Permit No. CA0085146
Bear Valley Water District (BVWD) Waste Water Treatment Plant

Dear Ms. Creedon:

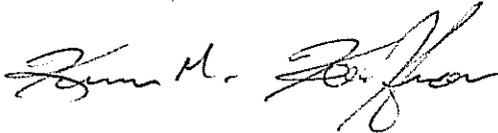
Stockton East Water District has reviewed the tentative permit and its alternative for the above facility. Based on the information provided, the recommendation of the California Department of Public Health, and discussions with Bear Valley Water District's Engineer, Gary Ghio, Weber-Ghio & Associates, the district will forgo its request for tertiary treatment at this time provided the following permit requirements are included:

1. Limit any discharge from this treatment facility as a last resort, and only during periods when the effluent would receive a minimum of 20:1 dilution from Bloods Creek;
2. Shorten the allowed discharge season (currently January through June) to April through June;
3. Require BVWD to conduct an inflow/infiltration study and implement the findings of the study;
4. Require on a daily basis that both the dilution standard is continuously met and appropriate water quality sampling (BOD, COD, etc.) is reported of any discharge to Bloods Creek at the point of discharge;
5. Continue to investigate methods to maximize land disposal
6. Require all new development to mitigate the impacts of their addition demand on the treatment facility;
7. Require BVWD to notify Stockton East Water District in advance of any planned discharge.

Thank you for the opportunity to comment on this NPDES renewal. Stockton East Water District receives water from both the Calaveras and Stanislaus River watersheds for its customers. Bloods Creek, which is the proposed receiving waters for BVWD's NPDES permit, is a tributary to the North Fork of the Stanislaus River. SEWD distributes water for irrigation and provides drinking water to the City of Stockton metropolitan area.

Wastewater discharges into these watersheds are of concern to SEWD because they increase potential impacts to our agricultural customers and drinking water treatment plant from bacteria, pathogenic cysts, viruses, metals, nutrients and organics. If you have any questions regarding this matter, please contact Jeanette Thomas at (209) 948-0333.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin M. Kauffman". The signature is fluid and cursive, with a large initial "K" and "M".

Kevin M. Kauffman, P.E.
General Manger

cc: Stockton East Water District Board of Directors
David Remick, California Department of Public Health