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December 21, 2010

Cliff Raley, P.E.
Waste Discharge to Land Permitting Program
California Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

re: Comments and Recommendations on Tentative Waste Discharge Requirements for Brown Sand Inc. and Mossdale Associates, LTD Brown Sand Mossdale Quarry

Dear Mr. Raley,

Brown Sand Inc. appreciates the opportunity to comment on the Tentative Waste Discharge Requirements cited above. Attached is a comment sheet, with recommended changes. Please consider our recommended changes prior to finalizing the Draft Waste Discharge Requirements considered by the Regional Board. Please notify us and provide a copy of the proposed Draft Waste Discharge Requirements prior to the public hearing scheduled for February 2011.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Robert Brown", is written over a light blue horizontal line.

Robert Brown, President
Brown Sand, Inc.

encl\
Comment sheet with recommendations
Attachments

cc\ Timothy O'Brien, Regional Board, Rancho Cordova
John H. Kramer, Condor Earth technologies, Inc.

Comments with Recommendations on Tentative WDRs for Brown Sand Mossdale

No.	Reference	Comment	Recommendation
1	WDR P6, 28.c.	Information on the storage of potentially hazardous materials was provided to the Regional Board via email on November 19, 2010, including a photograph demonstrating that the location of chemical storage was equally protected from flood as the fuel storage containment certified by a licensed surveyor. Attached to this letter is a copy of the correspondence and photo (Attachment 1).	Delete 28c.
2	WDR P7, 28.d.	A Spill Prevention, Control and Countermeasures Plan dated October 15, 2010 is attached, (Attachment 2). This plan minimizes potential for release of hazardous chemicals into flood water.	Delete 28.d.
3	WDR P10, A.6.	Brown Sand Inc imports inert aggregate products for processing and blending. These consist of rock, sand and gravel from other sites. Brown Sand believes these activities should be as acceptable as processing recycled materials.	Insert "inert rock, sand, gravel, and" before "recycled materials"
4	WDR P10, B.4.	Groundwater ponds go through natural cycles involving algal blooms with wide swings in pH that may exceed the discharge specifications. If intake water exceeds specifications and if post-processing water is of equal or better quality, Brown Sand activities did not "cause" ponds to exceed specifications.	None.
5	WDR P12,C.1.	We presume the term "other solids" is intended to designate septic tank solids. Please clarify that "other solids" does not refer to inert wastes washed from ore during processing.	Insert "septic system" before "wastes" in first line.
6	MRP P2, A.2.	Brown Sand Inc. will not report pH excursions above 8.5 S.U. as a violation of Discharge Specifications if post-processing water has pH equal to or less than lake water. See comment 4.	
7	INFO P1, para.1	Address of processing plant is 800 W. Mossdale Rd	Change address from 640 to 800 in first line.
8	INFO P1, para.5	See comments 1 and 2	Delete paragraph 5