



May 3, 2022

Mr. James Marshall
 California Regional Water Quality Control Board
 Central Valley Region
 11020 Sun Center Drive, Suite 200
 Rancho Cordova, CA 95670

Subject: Bear Valley Water District Tentative Order Comments/Suggestions

Dear Mr. Marshall:

The purpose of this submittal is to provide the Regional Water Board with comments and suggestions regarding the Bear Valley Water District (District) Bear Valley Wastewater Treatment Facility Tentative Order provided to the District for review on April 6, 2022.

We greatly appreciate the time you and your staff have taken to work closely with the District during the permit development process. The District is generally in support of the Order as written, with the exception of the comments and suggestions presented in the following table for your consideration.

Page	Section	Comment
27 B-1	Attachment B	We request the revised map attached separately to this memo be substituted for Attachment B for consistent naming of the Storage/Polishing Reservoir.
49 E-10	V.D.3	We request that this section be revised to read, "with the monthly self-monitoring report in which the test occurred."
50 E-11	VIII.A.1 VIII.A.2	We believe the Table should be titled "Table E-5" and section VIII.A.2 should also end with "Table E-5."
51 E-12	IX.B.1	We believe this section should read "described in Section IX.B.2."
52 E-13	IX.C.3	We believe this section should read "described in Section IX.C.4."
62-63 E-23-24	X.D.3	We request that Table E-10 be updated to reflect Recycled Water Policy Annual Reports. Additionally, this section refers to Table E-15 but this table does not appear to be included in the Order. Please clarify.
63 E-24	X.D.4.f	We request clarification that this "mixing zone analysis" requirement for the ROWD is simply a reiteration of the mixing zones/dilution credits we seek with a brief discussion of why dilution credits are still needed/applicable rather than requiring a full mixing zone study be completed.

92 F-28	IV.C.2.c.v.c	The RPA in this Order notes the maximum background copper concentration as 0.24 ug/L. Please clarify.
91 F-27	IV.C.2.c.v.a	The aluminum text section reads that the mixing zone length is 14 feet, but Table F-5 on page F-30 shows the aluminum mixing zone as 18 feet long. Further, the aluminum text section notes a chronic aquatic life dilution credit of 4.8:1, but Table F-5 on page F-30 shows a chronic dilution credit of 3.6:1. Please clarify.
92 F-28	IV.C.2.c.v.b	The ammonia text section reads that the mixing zone length is 4 feet, but Table F-5 on page F-30 shows the ammonia mixing zone as 18 feet long. Please clarify.
95 F-31	IV.C.2.e	There is a Table F-5 on page F-30 and F-31. We believe the table on page F-31 should be titled "Table F-6" and the associated text on F-31 should refer to "Table F-6".
114 F-50	IV.C.3.b.iv.(b)	We request this section include a discussion noting that the 2017 data set was excluded.
115 F-51	IV.C.3.b.v.(b)	We request this section include a discussion noting that the 2017 data set was excluded.
118 F-54	IV.C.3.b.vii.(a)	We request this section be amended to read "(river flow to effluent flow)."
137 F-73	VII.B.2	We request this section include a note that the effluent monitoring frequencies and sample types for flow are only required when discharge is occurring.
139 F-75	VII.D.1.b	We request this section include a note that the receiving water monitoring frequencies and sample types for flow are only required when discharge is occurring.
143-147 G-1 through H-2	Attachment G and H	Attachment G and Attachment H each have some values that either don't match the values elsewhere in the report or don't match the values in the updated spreadsheet sent to the District. We request that Attachment G and Attachment H be reviewed to ensure consistency with the rest of the permit and provided spreadsheets.

Please feel free to contact me if you would like to discuss these comments.

Sincerely,

Jeff Gouveia
District Manager

c. Kelly McGartland, Stantec Consulting Services Inc.