

April 30, 2007

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

Subject: *Comments on the Tentative Draft NPDES Permit*
AmeriPride Services Inc.: Operable Unit 3
Sacramento, California
Delta Project No. D097-094

Dear Mr. Marshall:

On the behalf of our client, AmeriPride Services Inc. (AmeriPride), Delta Environmental Consultants has the following comments and questions regarding the Tentative Draft NPDES permit for the above referenced site, dated March 23, 2007.

1. **Flow:** The Tentative Draft indicates on Table E-3 (Page E-2) that flow should be recorded continuously. AmeriPride proposes to have an electronic data recording system which would record the total flow every 10 minutes when the system is operating. The Regional Water Board would be supplied this data in the form of an Excel spreadsheet, showing the instantaneous flow rate in gallons per minute and total flow in gallons (approximately 144 data points per day). Please confirm that recording flow at this interval (once every 10 minutes) would be acceptable.
2. **Acute Toxicity Testing:** We respectfully request that the frequency of this test be altered to match the frequency for the Chronic Toxicity Testing, which is quarterly for the first year and annually thereafter.
3. **California Toxic Rule (CTR) Monitoring:** As stated on page E-8 of the Tentative Draft, we will be required to monitor quarterly for the first year for the priority pollutants contained in the CTR. Please clarify that the sampling point for the CTR monitoring is EFF-001.
4. **Authorized Person to Sign and Submit Reports:** The authorized person to sign and submit reports should be changed to Mr. Joe Peter.

Thank you for working with us on this permit. If you have any comments or questions about the above information, please contact me at 651-697-5230 or cstott@deltaenv.com.

Sincerely,
DELTA ENVIRONMENTAL CONSULTANTS, INC.



Catherine J. Stott
Project Engineer

CJS/sjs

cc: Ms. Rojean Rada – AmeriPride Services Inc.
Mr. Joseph Peter – AmeriPride Services Inc.
Mr. Jeffrey J. Thuma – Delta Environmental Consultants, Inc.

