

October 24, 2008

Diana Messina
Senior Engineer
California Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: City of Colusa NPDES Permit N0. CA0078999
September 2008 Tentative Draft Comments - Amendment

Dear Ms. Messina,

In addition to the comments submitted on October 14, 2008, please accept this letter containing an additional comment regarding the City of Colusa NPDES permit renewal (September 2008 Tentative Draft for CA0078999). The City has authorized ECO:LOGIC to review the Tentative Draft and provide comments on their behalf.

Comment 3

VII. COMPLIANCE DETERMINATION, Page 32, 33 – The City requests that the following language be added to this section:

H. Chronic Whole Effluent Toxicity Effluent Limitation. Compliance with the accelerated monitoring and TRE/TIE provisions of Provision VI.C.2.a shall constitute compliance with the effluent limitation IV.A.1.i for chronic whole effluent toxicity.

The proposed language is consistent with more recent tentative orders currently pending adoption by the California Regional Water Quality Control Board (e.g., City of Stockton NPDES permit Underline/Strikeout version).

Thank you for consideration of these comments prior to issuance of the Final Order. Please feel free to contact me to discuss this comment or if you have further questions.

Sincerely,
ECO:LOGIC Engineering



Yulya Borroum, P.E.

Cc: Patty Hickel, Public Works Administrator, City of Colusa