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February 18, 2011

Cliff Raley
California Regional Water Quality Control Board
3443 Routier Rd, Suite A
Sacramento, Ca 95827-3003

RE: Florin Rd Sand and Gravel Processing Plant,
Triangle Rock Products, Inc. Sacramento
Comments - Tentative Report of Waste Discharge

Dear Mr. Raley:

Triangle Rock Products, Inc. (Triangle) has reviewed the January 20, 2011 tentative Waste Discharge Requirements (WDRs) Order for its Florin Road Aggregate Plant in Sacramento County. The following are Triangle's comments:

Waste Discharge Requirements

Pg 1, #5, line : To clarify that only a portion of the 534 acre facility is to be mined insert "339 acres to be mined," following the word "includes".

Pg 2, #9: For clarification of current conditions modify condition to read as follows;

"Current mining activities are within mining Phase IX (including *former* Settling Ponds 1 and 2). These ponds ~~had have~~ a total surface area of nine acres, ~~were are~~ approximately 19 feet deep, and ~~had have~~ a combined capacity of approximately 153 acre-feet at two feet of freeboard. Former Settling Ponds 1 and 2 were removed during the mining of Phase IX and replaced by Settling Ponds 3-6 in excavated mining Phases I and II. "

Pg 2, #10, 2nd line: Replace "ore" with "aggregate" which is the mining industry terminology for sand and gravel.

Pg 2, #11, 2nd & 3rd lines: Replace "ore" with "aggregate" which is the mining industry terminology for sand and gravel.

Pg 5, #30:

- 1st sent: Change "will" to "may" to clarify that former Settling Ponds 1 and 2 may but are not mandated to be converted into multiple settling ponds.
- 2nd sent: Modify sentence to read as follows;

"The future ponds ~~will~~ *may* have a total surface area of 28 acres, an average depth of 47 ~~49~~ feet, and a capacity of approximately 1,000 acre-feet with a two feet freeboard."

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Pg 5, #35, 3rd line: Unmined portions of Phases V through VIII only drain naturally to Laguna Creek. Change “Frye Creek” to “*Laguna Creek*” and delete “or a wetland area south of Florin Road.”

MRP

Pg 4, #5, end of 1st sent: Correct “tends” to “*trends*”.

Pg 4, #7: Semi-Annual Report; Since monitoring of groundwater elevations is not one of the listed monitoring requirements, delete requirement for a summary data table of groundwater elevations.

Information Sheet

Pg 1, 1st para, 2nd to last sentence: To clarify that only a portion of the original 413 acre facility was to be mined change sentence to read as follows;

“...issued for excavation of *249 acres* of the 413-acre mining site.”

Pg 1, 3rd para, 1st line: To clarify that only a portion of the 534 acre facility is to be mined insert “*339 acres to be mined*,” following the word “includes”.

Pg 2, 2nd to last para, 1st line: To reflect that gold recovery does occur on the site correct sentence to read as follows:

“The Discharger ~~does not~~ presently performs gold recovery.”

Pg 3, 1st complete para:

- Line 1: Change “2017” to “2033” which is the date the Sacramento County Use Permit will expire.
- Last line: Change “27” to “25” which is the date the Reclamation Plan was approved by Sacramento County.

Pg 3, 3rd para, 3rd line: Unmined portions of Phases V through VIII only drain naturally to Laguna Creek. Change “Frye Creek” to “*Laguna Creek*” and delete “or a wetland area south of Florin Road.”

Thank you for the opportunity to present these comments. If you have any questions or need additional information please contact by phone at 559-269-1376 or by email at jcbuada@buada.com or contact Tom Ferrell by phone at 559-434-1202 or by email at ferrellt@vmcmail.com.

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Sincerely,

A handwritten signature in black ink, appearing to read "John C. Buada". The signature is fluid and cursive, with a long horizontal stroke at the end.

John C. Buada
Representative
Triangle Rock Products, Inc.

Cc: Bob Fine, Triangle Rock Products, Inc.
Tom Ferrell, Vulcan Materials Company
Steve Grace, Vulcan Materials Company
Pat Mitchell, Downey Brand