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FRESNO, CALIF.

VALLEY WASTE DISPOSAL COMPANY

7500 MEANY AVE.
BAKERSFIELD, CALIFORNIA 93308

May 14, 2007

Mr. Dale Harvey
Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706-2020

Subject: NPDES No. CA 0081311
Valley Waste Disposal Company
Kern Front 2

Dear Mr. Harvey:

Thank you for allowing Valley Waste Disposal Company to review the newly proposed NPDES No. CA 0081311.

In general, we feel that this proposed permit meets most of our needs and concerns and we very much appreciate the efforts that you and your staff have made in the last few months and the cooperation that you have displayed in expediting this entire process.

There are three items with which we have concerns and we would appreciate your consideration of our suggestions.

The first of these concerns is on page 19, Section 7 of the Permit. This same issue can be found on Page 2 of the Monitoring and Reporting Program. First, Valley Waste has already purchased this equipment and we expect to have it installed by the date required. As you know, we have utilized this type of equipment in the past and experienced difficulties with the accuracy and operation of the continuous EC meters. In discussing this with other parties, we understand that these types of difficulties are not uncommon. Therefore, we request that if these operational issues arise in the future, we be permitted to utilize daily grab samples for EC monitoring in place of the continuous monitoring. The EC of the water being delivered to the Cawelo Water District from Valley Waste does not vary significantly.

Our second request is that acute toxicity testing, which was only required once during the life of our previous permit issued in 1995, be changed from twice per year to twice per the life of the permit. The source of the water being delivered by Valley Waste will not change during the life of the permit and the quality should only vary slightly. This test is very expensive and it would seem that twice during the life of the permit would be adequate.

Our third concern is similar to the previous concern. We request that priority pollutant monitoring be required twice during the life of the permit rather than annually as presently proposed. We base this request on the same reasoning that we have regarding acute toxicity testing.

Thank you for considering these requests and we look forward to receiving a positive response from you.

Sincerely,

VALLEY WASTE DISPOSAL COMPANY

L. S. Bright
Manager

LSB:kc

Cc Cawelo Water District
J. Robinson, Vintage
Carrithers, Klein DeNatale