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City of Ione



30 October 2006

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SACRAMENTO  
CVRWQCB

Scott Kranhold  
CVRWQCB  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

Dear Sir:  
Re: Draft Cease and Desist Order, Mule Creek State Prison

This letter is submitted to provide comments on the Draft Cease and Desist Order for Mule Creek State Prison.

- Under **DESCRIPTION OF FACILITIES AS FOUND IN THE WASTE DISCHARGE REQUIREMENTS (4)**, is stated: "...Mule Creek State Prison is under contract to deliver a minimum of 80 acre-feet of wastewater annually to the Amador Regional Sanitation Authority's (ARSA's) wastewater treatment and disposal system."

Comment: The contract currently specifies a maximum of 130 acre-feet as well as the minimum of 80.

- Under **ATTACHMENT B, GROUNDWATER MONITORING AND REPORTING REQUIREMENTS CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION MULE CREEK STATE PRISON WASTEWATER TREATMENT PLANT**, the prison will be required to sample monitoring wells only three quarters of the year, and minerals on an annual basis.

Comment: First quarter monitoring well sampling is usually waived for locations where snow pack may interfere with access. That situation does not exist in the Ione Valley, so there is no compelling reason to forego a full four quarters of sampling annually. Additionally, other facilities of similar capacity are required to sample for minerals quarterly, the prison should likewise be required to sample minerals quarterly.

Respectfully,

Julio S. Guerra  
Chief Operator

cc: City Administrator  
City Engineer  
ECO:LOGIC, Harold Welborn