

May 23, 2007

70659

Mr. Kevin Kratzke
Water Resources Control Engineer
California Regional Water Quality Control Board
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002

The logo for VESTRA Resources, Inc. features the word "VESTRA" in a bold, white, sans-serif font on a dark blue rectangular background.

**RE: Tentative Waste Discharge Requirements
Big Valley Power, LLC
Lassen County, California**

Dear Mr. Kratzke:

Big Valley Power, LLC (BVP), is in receipt of tentative Waste Discharge Requirements for the sawmill and cogenerator facility in Bieber, California. Comments and suggested revisions follow.

Page 3, paragraph II (also page 8, item 6), regarding ash storage: The area of ash storage is, and was during previous operations, an outdoor storage area. BVP will berm the ash storage area to ensure that ash does not leave the location via storm water runoff. If necessary to control storm water flow, ash may be transferred to metal bins and stored under cover in buildings onsite. BVP requests wording in the WDRs be modified to clarify ash storage. Proposed language:

~~Ash will continue to be stored in this area, however the area will be bermed to ensure ash and any storm water falling off the ash remains in the bermed area. In case of outdoor storage, ash will be placed in metal bins and stored in covered areas of the site.~~

Proposed new language:

Ash will continue to be stored in this area, however the area will be bermed to ensure ash and any storm water falling on the ash remains in the bermed area. As necessary to ensure containment, ash may be placed in metal bins and stored in covered areas of the site.

Page 5, paragraph I (also page 10, provision 3), regarding pollution minimization and control measures and work plan: Pollution minimization plans and practices are required under Section 2.4.5 of the State Implementation Plan addressing discharges to inland surface waters (NPDES program). BVP is fully committed to ensuring that discharges from the facility to onsite retention ponds do not impact groundwater

Mr. Kevin Kratzke
May 23, 2007
Page 2 of 2

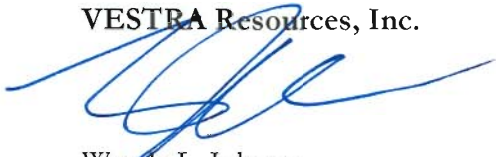
beneath the site, but questions the applicability of the SIP provisions to Waste Discharge Requirements and proposes this requirement be removed.

Page 7, B (3), and Table 1 information sheet: We believe the secondary MCL for aluminum is 200 µg/l, not 50 µg/l as stated in the table.

Please call if you have any questions at (530) 223-2585.

Sincerely,

VESTRA Resources, Inc.



Wendy L. Johnston
Project Manager

cc: Mr. Thor Hibbeler/National Power Company
Mr. Len Wohadlo/National Power Company
Mr. Jerold Desroche/National Power Company