



**CONTRA COSTA
WATER DISTRICT**

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January 20, 2006

Directors

Joseph L. Campbell
President

Elizabeth R. Anello
Vice President

Bette Boatman
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Walter J. Bishop
General Manager

Gayleen Perreira
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Re: Comments on Tentative Order for PG&E Shell Pond, NPDES No. CA0030082

Dear Ms. Perreira:

Contra Costa Water District (CCWD) wishes to propose one change to the subject Tentative Order, to reduce the Pacific Gas and Electric (PG&E) reporting requirement to CCWD on the subject of Shell Pond discharges from monthly to annual. This revision to the reporting requirement is agreeable to both CCWD and PG&E, as it will reduce the administrative burden on both without changing the effectiveness of the required monitoring. The proposed edits to the language of the Tentative Order are contained in the attachment.

CCWD would also like to acknowledge the RWQCB staff for their efforts to work with all parties affected by this discharge. The PG&E Shell Pond is a unique case, and the individualized attention from RWQCB staff has assured CCWD that the beneficial uses of receiving waters are being fully protected in this case.

If you have any questions or would like to discuss this matter further, please contact me at (925) 688-8187, or Matt Moses at (925) 688-8106.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard A. Denton", with a horizontal line underneath.

Richard A. Denton
Water Resources Manager
Contra Costa Water District

Attachment: CCWD's Proposed Changes to Tentative Order

cc: Mike Brown (PG&E)
Robert Ellgas (Shaw)

ATTACHMENT

CCWD's Proposed Changes to Tentative Order:

VI. PROVISIONS

C. Special Provisions

7. Special Studies, Technical Reports and Additional Monitoring Requirements

b. Discharge Termination and Notification Requirements

The Discharger shall stop discharging if and when required to stop by Contra Costa Water District (CCWD). The Discharger shall ensure that discharge does not occur at times when CCWD is diverting water from Mallard Slough, unless the Discharger has obtained prior written approval to discharge from CCWD. If CCWD is diverting, the Discharger shall provide a copy of Contra Costa Water District's approval to the Regional Water Board prior to discharging. If CCWD requires the Discharger to terminate discharging, the Discharger shall terminate its discharge within 24 hours, or within another period of time that is mutually agreeable to CCWD and the Discharger.

The Discharger shall provide ~~monthly~~**annual** notification of operations via email to CCWD. Each notification should summarize operations over the previous ~~month~~**year** (including total volume and flow rate of discharges, and monitoring activities), provide any new monitoring data, and describe the projected operations for the upcoming ~~month~~**year**.