

# CALIFORNIA UTILITIES SERVICE, INC.

A California Corporation

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January 4, 2007

Matthew Keeling, P.E.  
CRWQCB - Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

**RE: Draft Order**

Dear Mr. Keeling,

California Utilities Service (CUS), along with its engineer René Fuog of Fuog Water Resources, has reviewed the Draft of Waste Discharge Requirements Order No. R3-2007-0008 for California Utilities Service, the Draft Monitoring and Reporting Program (MRP) No. R3-2007-0008, the Staff Report for the proposed Order, and the Standard Provisions and Reporting Requirements for Waste Discharge Requirements. Our comments are as follows:

Staff Report:

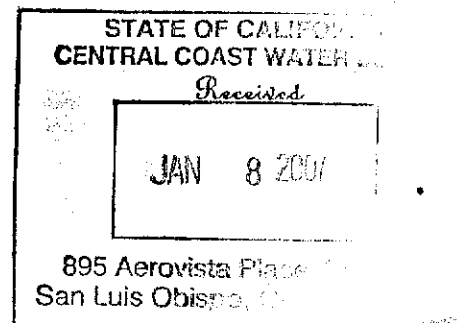
1) Page 1, in Summary section, first paragraph, last sentence, the date "1996" should be changed to "1986". (The incorrect date "1996" also appears in another location, specifically, in the Draft of Waste Discharge Requirements Order No. R3-2007-0008 for California Utilities Service on page 1, under the Facility Information section in paragraph number 1, last sentence.)

Draft of Waste Discharge Requirements Order No. R3-2007-0008 for California Utilities Service:

1) As stated above, the incorrect date "1996" appears on page 1, under the Facility Information section in paragraph number 1, last sentence, and should be changed to "1986".

Draft Monitoring and Reporting Program (MRP) No. R3-2007-0008:

1) Item C1. We request that the Turbidity requirement be eliminated, as this effluent is not being treated to meet tertiary or Title 22 requirements for reclaimed water nor is the effluent being discharged to surface water.

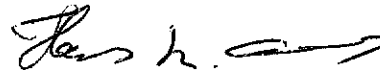


Item No. 14, Attachment 4  
February 9, 2007 Board Meeting  
California Utilities Service, Inc.

- 2) Item E1. Daily monitoring of the effluent storage pond seems excessive. As the water surface area of the pond varies between 1 to 1.6 acres, a one-day storage of the design flow would only result in a 0.7-foot increase in depth. Since CUS owns both the treatment facility and the effluent disposal sprayfield, CUS has the ability to discharge to the sprayfield at any and all times as allowed by its permit. Therefore, there would not be long periods of time that discharges to the sprayfield could not be made which would necessitate long-term storage. Consequently, we recommend a weekly monitoring of the effluent storage pond level.
- 3) Item E2. The daily observation of the sprayfield should be limited to times when effluent is actually discharged. Please modify accordingly.

If you have any questions or require additional information, please do not hesitate to contact me at (831) 424-0442 or René Fuog of Fuog Water Resources at 1704 Stone House Lane, Lincoln, CA 95648.

Sincerely,



Thomas R. Adcock  
Vice President

TRA/ams

cc: René Fuog, Fuog Water Resources