Comments to Proposed Order No R3-2015-0007

By Windset Farms

Dated March 30, 2015

Hearing Notice Letter:

- Letter is addressed to David Wesley, but it starts with Dear Mr. Hayes, should be Mr. Wesley.

WDR Comments

- Page 1, FACILITY/SITE DESCRIPTION, Facility, Number 5 – need a new bullet b stating "two (2) 21.5 acre high tunnel hoop houses located east of the existing glass greenhouse structures within the existing 221-acre parcel".
    - An updated site figure is required to match this configuration.
- Page 1, FACILITY/SITE DESCRIPTION, Facility, Number 5, sub-bullet b – updated facility description sizes to include the additional 43 acres of hoop houses mentioned above. "Eighteen acres of growing-related structures (i.e. , tanks, pumps, etc.) eight acres of parking and walkways, eight acres of landscaping and 16 acres of undeveloped land."
- Page 2, Number 6 – add in sentence, "The anticipated growing start date for the two 21.5-acre hoop houses is Fall, 2015."
- Page 2, Number 7, sub-bullet c, - The Staff Report states daily maximum flow rate of 800,000 gallons while the WDR states 750,000 gallons.
- Page 2, Number 7, sub-bullet a, - number of employees and septic system daily flow rates being confirmed.
- Page 2, Number 7, sub-bullet c, second to last sentence - the word "water" is miss spelled as wafer.
- Page 2, Number 7, sub-bullet c, sub-sub iii – The description of the evapotranspiration water flow is correct here. The Condensate drains to the waste system tanks NOT back into the Irrigation Drain Water recirculation. The text here is correct, the flow diagram Figure 2 in the Staff Report is incorrect and needs to show the condensate leaving the greenhouse and going to the spent irrigation water tank. This is also mentioned in the Staff Report comments.
- Page 2, Number 7, sub-bullet c, sub-sub v – The description of the boiler blowdown is incorrect. The boilers heat water that remains in a closed loop system from the boilers to the heat storage tanks, through the greenhouses and back to the boilers. There are no water discharges from the heating system. The boilers do generate exhaust condensate as discussed in earlier communications on lesser water flows.
- Page 3, Number 8b, end of paragraph – what does "[Move to a finding]" mean?
- Page 5, COMPLIANCE HISTORY, Number 22 – Comment, the Staff Report Compliance History section on page 13 provides an accurate depiction of the timeline. Would it be appropriate to add in Number 22, "Prior to and after the issuance of the NOV, discharger has been cooperative with staff in addressing compliance data collection supporting permitting of the facility operations." Would it be appropriate to add that the date the NOV was rescinded?
- Page 9, Number 3 – How does this apply to storm water and other small fresh water uses outside of the process flows that will not contain chemical additives? Those waters would either

be absorbed at the point of ground contact or under significant flows, such as storm events, go into the storm water basin. They are not process waters and will not go through the de-nitrification biofilters. Could this sentence be reworded to reflect the need for processing of process related waters such as "Bypass of the treatment facility of irrigation process-related waters and discharge of untreated or partially treated wastes is prohibited."

- Page 10, Effluent Limitations, Number 10 – The 30-day running average of 8,000 gallons per day…..how is that to be measured? Confirming the correct numbers.
- Page 10, Groundwater Limitations, Number 13 – The fecal coliform organisms in groundwater limit of 2.2/100ml. How is that to be measured and confirmed?

Staff Report Comments

- Page 1, Key Information, Design Capacity – sanitary waste flows are being confirmed.
- Page 1, Key Information, Design Capacity – waste water flow stated here on page 1 is up to 750,000 gpd, page 7 "Flow" section of Staff Report "Flow" 800,000 gpd. The WDR states 750,000 gpd on page 2 number 7. These flow volumes should be consistent.
- Page 1, 4th bullet in Summary – Evapotranspired water and wall condensate captured as….. should this state "captured and reused"?
- Page 3, bottom paragraph under figure, second sentence – the current proposal for the hoop houses is for two 21.5 acre structures. This is not technically critical as the water all gets handled as stated, regardless of the hoop house location.
- Page 4, first paragraph, last sentence – to clarify, it may help to add "when compared to traditional ground surface, soil-based agricultural operations".
- Page 4, Figure 2 Windset farms Water Flow Diagram – The diagram incorrectly depicts the Condensate water recirculating back into the irrigation flow. The Condensate water actually leaves the greenhouse and goes into the Spent Irrigation Water tank.
- Page 7, last paragraph "Flow", third sentence – this sentence states, "800,000 gallons per day from the four 32-acre greenhouses." It should include the four 32-acre greenhouses AND two 21.5 acre hoop houses. All of these growing areas contribute to the discharge.
- Page 7, last paragraph "Flow", fourth sentence – this sentence states, "At the time this staff report was prepared, the strawberry greenhouses were not constructed…… The additional growing structures are not "greenhouses" and may or may not grow "strawberries". A suggested rewording could read, "At the time this staff report was prepared, the additional hoop house growing structures were not constructed……." The initial crop may be strawberries but it could easily be changed if market conditions dictate.
- Page 10, bulletized section, fourth bullet – This bullet states the Condensate is recycled. While it is collected, it is combined with the other waste water streams and used as irrigation water on the fodder crop. It is therefore recycled for an additional use, just not as greenhouse irrigation water.
- Page 11, last paragraph, **Error Reference Not Found**.
- Page 12, Figure 7 – suggest revising to read "Approximate Groundwater Gradient". Could be confused for ground surface gradient.

Monitoring and Reporting Plan Comments

- Page 2, SEPTIC TANK MONITORING, Number 1 – The sampling frequency for flow rates requires "Continuous" sampling. What is the expectation around this tracking? Can an example of how others accomplishing this be provided?
- Page 7, first paragraph (remainder of Number 3 from previous page), first sentence – States, "The report shall address operator certification and provide a list of current operating personnel and their grade of certification." Windset's waste handling is for agricultural water and does not require personnel to maintain outside entity accredited certifications. Waste water operations are managed with a combination of internal staff and outside consultants. This statement as worded would not appear to be applicable unless the expectation is for Windset to discuss how they internally identify the skills required for system operation and compliance tracking.
- Page 7, first paragraph (remainder of Number 3 from previous page), last sentence – with regards to the Facility's Operational and Maintenance Manual, there is not one manual for the operation of the greenhouse facility. The operations are a series of SOP, BMP's and grower decisions made as weather conditions, crop growth cycles and market conditions change. There is a standard method for processing and handling the waste water streams. That could be presented in a large SOP or Manual format if that would be appropriate. Need to better understand the expectations of what a "Manual" is.