



**Cranmer Engineering, Inc.**  
*Integrated Engineering Services*

April 24, 2012

Gregory D. Cash, P.G.  
California Regional Water Quality Control Board  
Central Valley Region  
415 Knollcrest Drive, Suite 100  
Redding, CA 95002

RE: Renewal of Waste Discharge Requirements for  
Sunsweet Dryers, Inc., Prune Dehydrator Glenn County  
Tentative Waste Discharge Requirements, R5-2012-XXXX

Dear Mr. Cash:

As one of the designated parties for Sunsweet Dryers, Inc. we submit this request concerning the above Tentative Discharge Requirements scheduled for hearing June 7/8, 2012 Board Meeting. There is one item in the proposed order that creates a significant problem for the project.

The item we request be deleted is order Item No. C.6. which states:

*"Irrigation with wastewater shall not be performed within 24 hours before a predicted storm, during precipitation, or within 24 hours after the end of any precipitation event, nor shall it be performed when the ground is saturated"*

The following are reasons and justifications for deletion or revision of item are as follows:

1. When received, the prunes and walnuts must be immediately placed into processing in order not to lose their viability.
2. Once either the prune or walnut processing is commenced it is continuous and cannot be stopped.
3. If processing were stopped while the prunes/walnuts are being processed they will spoil and the prunes/walnuts will become unusable, or lose most if not all their value in the end product.
4. To stop the processing of walnuts or prunes 24 hours before a storm event, during a storm event, or waiting until 24 hours after the end of a storm event can be detrimental to the product and livelihood of Sunsweet Dryer. The fruit being processed would be lost for use, plus the fruit being received could not be placed into processing and would be lost for use.

***Integrating people, land and water.***

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5. If item C.6 is deleted, proposed WDR Item C.1 adequately provides for protection of adjacent areas from any runoff from the property owned by the Discharger as it states:

*“The perimeter of the land application area shall be graded to prevent ponding along public roads or other public areas and prevent runoff onto adjacent properties not owned or controlled by the Discharger.”*

In conclusion:

- A. In order for Sunsweet to process prunes and walnuts during a very short harvesting/processing season each year, Sunsweet needs to be able to process the fruit continuously during the season whether it is raining or not, or the fruit may be lost.
- B. WDR No. C.1 is adequate to protect the waters of CA for the purpose intended.
- C. We request that proposed WDR No. C.6 be removed from the proposed orders.

Respectively submitted:

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Thomas E. Leland, P.E.  
Cranmer Engineering, Inc.

Dale O'Bryan  
Staff Engineer

Cc: Ron Falkowski, Melvin Ward

*File: L\12-020\transmittals\toRWQCB delete item C6 for proposed WDR 04\_23\_2012*

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