

Popenoe, Steve@Waterboards

From: Burgard, Daniel J. <dan.burgard@cascade-earth.com>
Sent: Friday, October 18, 2013 3:44 PM
To: Harvey, Dale@Waterboards; Popenoe, Steve@Waterboards
Cc: John Layous; Todd Bockman (tbockman@thegarliccompany.com); Nicolas Legonde
Subject: Followup Comments on the The Garlic Company Tentative WDR

Steve and Dale-

We've reviewed the Tentative Waste Discharge Requirements (WDR) for The Garlic Company and found the following items that deserve comment. Per our discussion at your office yesterday (October 17) we provide them on behalf of The Garlic Company for your consideration before the Tentative WDR is finalized for the December Agenda.

Findings

Pg 2 Item 5- The description of products processed doesn't include peppers. This may be an omission that needs to be corrected.

Pg 3 Item 11- The item refers to the irrigation system as a pivot and handlines. Currently, the irrigation system is big gun solid set with 6 zones. This may be an error that needs to be corrected given Discharge Prohibition A.3.

Pg 4 Item 21- The item states, "...Groundwater Monitoring Well Installation Work Plan due 23 September 2013" but it is actually due October 18, 2013. This typographical error should be corrected.

Discharge Prohibitions

A.3 – Discharge in a manner different from that described in the Findings is prohibited. Does the mis-characterization of the irrigation system in Findings Pg 2 Item 5 create a problem?

D.6 – No irrigation is allowed within 24 hours of measureable precipitation. Is this necessary if runoff is controlled? All runoff, if it occurs, at The Garlic Company is captured by runoff sumps. In fact, measureable precipitation can be used to an advantage. A small, but measurable precipitation event (eg, 0.10") with nothing behind it can wet the soil surface and allow a much more efficient irrigation to occur within 24hr, before the 0.10" dries. Also, a precipitation event may be measureable but insignificant (0% effective). A better prohibition might be to prohibit irrigation during a rainfall event that creates runoff or just stay with the prohibition of runoff from the site.

E.1 - Solids from the pond bottom are not allowed for land application on Use Area. This seems unusual given the nature of the solids. If the solids are properly characterized and applied at appropriate rates the Use Area is an excellent place for the pond bottom solids.

Effluent Monitoring

- weekly General Minerals and all other parameters, BOD, TDS, FDS, N, etc. Weekly testing, especially for general minerals, seems excessive given the long monitoring history (11 years) already established.

Source Water Monitoring

- weekly flow-weighted EC. Sample Type should be "Grab" not "Computed average".

Thank you for allowing us to provide these informal comments. Please contact me or Lee Waddle if you have questions or need clarification on what we have provided.

Dan Burgard
Cascade Earth Sciences
(509) 921-0290 Spokane, WA office
(559) 732-3665 Visalia, CA office
(509) 981-9241 cell

The information contained in this E-mail message and the documents accompanying this message are privileged and confidential, and may be protected from disclosure. Please be aware that any use, printing, copying, disclosure or dissemination of this communication may be subject to legal restriction or sanction. If you think that you have received this E-mail message in error, please reply to the sender.