

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 9/10 October 2014**

Response to Written Comments for Victor Packing, Inc., Raisin Processing and Dehydrating Plant, Tentative Waste Discharge Requirements

At a public hearing scheduled for 9/10 October 2014, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of revised Waste Discharge Requirements (WDRs) for the Victor Packing, Inc., Raisin Processing and Dehydrating Plant in Madera County. This document contains responses to written comments received from interested parties regarding the Tentative WDRs (TWDRs) circulated on 9 July 2014. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 11 August 2014 to receive full consideration. Comments were received from Dellavalle Laboratory, Inc. (Dellavalle) on behalf of Victor Packing, Inc. (Victor Packing).

Written comments are summarized below, followed by responses from Central Valley Water Board staff. Based on the comments, Central Valley Water Board staff has made some changes to the TWDRs. Staff also made a few minor changes to improve clarity and fix typographical errors. Where Staff responses below present specific changes made to the TWDRs, additions are in bold text and deletions are in strikeout.

VICTOR PACKING COMMENTS

VICTOR PACKING – COMMENT No. 1: Victor Packing indicates the design, construction, and sampling of monitoring wells is expensive and provides no information to assist in managing its discharge. Victor Packing would like to focus on management tools such as metering and analysis of supply and wastewater, analysis of receiving lands, and development of nutrient and salinity management and control plans. Therefore, the Discharger requests that installation of monitoring wells and groundwater sampling be omitted from the Order.

RESPONSE: No change has been made. Raisin processing wastewater is high in biochemical oxygen demand (BOD) and nutrients such as nitrogen and potassium, and if not properly managed these constituents can degrade or pollute groundwater and impair beneficial uses. Discharges at similar sites have degraded, and in some cases polluted, groundwater. Given the high quality of groundwater in the area and with depth-to-groundwater at about 140 feet below grade, groundwater monitoring is the only way to establish groundwater quality beneath the site and determine if the discharge and reuse of wastewater has caused or threatens to cause degradation or pollution of groundwater. The information obtained from groundwater monitoring will help both Victor Packing and Water Board staff determine if existing measures and management practices at the site are sufficient to protect groundwater quality or if additional measures are necessary.

VICTOR PACKING – COMMENT No. 2: Victor Packing requests clarification of Finding 10, which states in part: "...the existing monthly average daily flow limit of 0.06 mgd and set an annual discharge limit of 10 million gallons, which is well below the current annual discharge of about 3 million gallons per year." **Both of these limits are well above current flows.**"

RESPONSE: Finding 10 has been modified as follows:

“...the existing monthly average daily flow limit of 0.06 mgd and sets an annual discharge limit of 10 million gallons, which is well ~~below~~ **above** the current annual discharge of about 3 million gallons per year.”

VICTOR PACKING – COMMENT No. 3: Victor Packing requests that staff verify the statement in Finding 26 that states that the Plant and land applications areas are within flood zone X, with a risk of annual flooding of less than 0.02%

RESPONSE: The Federal Emergency Management Agency (FEMA) prepares maps that delineate flood zones and areas of risk due to flooding. Flood Map 06039C1170E revised on 09/26/2008 covers the area around the site. A review of this map on the FEMA Flood Map Service Center website shows that the Plant and land application areas are in unshaded Flood Zone X, which is determined to be outside the 0.2% annual chance floodplain. Finding 26 has been modified as follows:

“... the Plant and land application area are within Flood Zone X, areas determined to be outside the **500 year floodplain, with less than a 0.2% annual chance of flooding**”.

VICTOR PACKING – COMMENT No. 4: Victor Packing states that Land Application Area Specification D.3 places an undefined limit on pH so that buffering capacity of the soil is not exceeded, and requests clarification since pH is not an indicator of impact on buffering capacity.

RESPONSE: To clarify the intent of Land Application Area Specification D.3, the TWDRs have been modified as follows:

“D.3. The **resulting effect of the discharge on soil pH** of the discharge shall not exceed the buffering capacity of the soil **profile**.”

VICTOR PACKING – COMMENT No. 5: The Monitoring and Reporting Program (MRP), requires soil sampling and analysis for Cation Exchange Capacity (CEC). According to Dellavalle, the sum of cations method should not be used to estimate CEC since free lime, gypsum, or other minerals unassociated with the cation complex in the soil may result in a high estimate of the CEC.

RESPONSE: No change has been made. The MRP does not specify what analytical method needs to be used for analysis of CEC. However, the MRP does require that the samples be representative of the nature of the material being sampled. Estimating the CEC based on a summation of cations extracted from the soil could lead to an overestimation of the soil CEC due to the presence of free lime or gypsum in the soil. Therefore, this method should not be used to calculate the CEC unless there is information to indicate that lime and/or gypsum have not been applied at the site in recent years.

VICTOR PACKING – COMMENT No. 6: The MRP requires that soil samples be collected at six inches, 2, 4, and 6 feet below ground levels. These dimensions designate planes which have no volume and are ambiguous. In that past, Dellavalle has collected samples from the surface six inches

and one foot increments centered at the remaining three depths. Victor Packing requests the MRP be modified to designate specific volumes that should be sampled.

RESPONSE: To clarify the volumes of soils to be collected during soil sampling, the soils monitoring section of the tentative MRP has been modified as follows:

“.....Soil samples BK-001 and S-001 through S-004 shall be collected and analyzed for the constituents and frequencies specified below:

<u>Frequency</u>	<u>Constituent/Parameter</u>	<u>Units</u>	<u>Sample Type</u> ¹
Once ²	Cation Exchange Capacity	meq/100 grams	Grab
Annually	Moisture Content	% volume	Grab
Annually	Soil pH	pH units	Grab
Annually	EC	umhos/cm	Grab
Annually	Sodium	mg/kg	Grab
Annually	Chloride	mg/kg	Grab
Annually	Potassium	mg/kg	Grab
Annually	Nitrate as nitrogen	mg/kg	Grab
Annually	Ammonia as nitrogen	mg/kg	Grab
Annually	Total Kjeldahl nitrogen	mg/kg	Grab

1. Discrete samples to be analyzed shall be collected **from standard 6-inch cores starting** at 6-inches, 2, 4, and 6 feet below ground surface (bsg).
2. Soil samples for cation exchange capacity shall be analyzed once during the first sampling event following adoption of this Order.”

VICTOR PACKING – COMMENT No. 7: The MRP requires that engineering or geologic reports be signed by registered engineers or geologists. Therefore, it would be appropriate to have agronomic reports be signed by certified agronomic practitioners.

RESPONSE: No change has been made. The MRP requires that reports requiring interpretation and proper application of engineering or geologic sciences be certified by appropriately registered professionals as specified in the California Business and Professions Code. The Business and Professions Code does not, however, contain requirements specifically related to agronomists or agronomic practitioners.