

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

ORDER R7-2015-0023

**WASTE DISCHARGE REQUIREMENTS
FOR
SPRECKELS SUGAR COMPANY, INC.
OWNER/OPERATOR
SUGAR BEET PROCESSING FACILITY
RECYCLED PROCESS WATER HOLDING BASIN
Brawley – Imperial County**

The California Regional Water Quality Control Board, Colorado River Basin Region (Colorado River Basin Water Board), finds that:

1. Spreckels Sugar Company, Inc. (Discharger), located at 395 W. Keystone Road, P.O. Box 581, Brawley, CA 92227, submitted an application on March 20, 2015 to update their Waste Discharge Requirements (WDR) for their Sugar Beet Processing Facility (Facility) Recycled Process Water (previously Coal Ash Transport) Holding Basin.
2. The Facility has been subject to the waste discharge requirements (WDRs) adopted in Order R7-2003-0016. The WDRs are being updated to comply with current laws and regulations as set forth in the California Water Code and the California Code of Regulations (CCR) and to incorporate changes in ownership or operation undertaken by the Discharger.

Facility and Discharge

3. In the past, the Discharger operated a coal-fired boiler that generated ash as spent fuel. This ash, mixed with return water from a holding basin, was pumped back to an earthen, unlined holding basin during operation months. The Discharger has recently eliminated the use of coal for the boiler and now burns only natural gas. Because there is no longer a need to slurry the ash, the Discharger proposes to convert the coal ash pond into a recycled process water holding basin.
4. Operational wastewaters from washing and processing sugar beets are discharged into a separate treatment and disposal system that is subject to the waste discharge requirements contained in Order R7-2013-0057.
5. The Facility operates continuously during the sugar beet harvesting period from approximately the beginning of April until mid-August of each year.
6. About 3,000 cubic yards per year of solids were generated by the coal-fired boiler

and deposited in the coal ash basin. Results of testing conducted by the Discharger on representative samples of solids deposited in the holding basin have confirmed that the generated ash is non-hazardous and non-toxic according to the criteria of Article 11, Title 22 CCR. The solids removed from the holding basin were sold as products (fill material, cement additive etc.) or stored on site pending sale. The last of the remaining ash was removed from the pond in August 2012 and transported to an approved disposal site.

7. Flow to the coal ash holding basin was pumped at a rate of approximately 400,000 gallons per day (MGD) from April to September each year. It is expected that the flow to the recycled process water holding basin will remain the same as before the change in operation.
8. The holding basin is located in the northwest $\frac{1}{4}$ of Section 29 and north $\frac{1}{2}$ of Section 30, Township 14 South, Range 14 East, San Bernardino Baseline and Meridian, as shown on the attached site map in Attachment B.
9. Process water is supplied to the Facility by Imperial Irrigation District (IID) via the All-American Canal.
10. Results of monitoring conducted by the Discharger and included in their 2014 season annual report indicate that at the end of the 2014 operating season, the wastewater in the holding basin has the following characteristics:
 - a. Total Dissolved Solids (TDS): 782 milligrams per liter (mg/L)
 - b. pH: 8.1 pH units
 - c. Sulfate: 202 mg/L

Basin Plan and Beneficial Uses

11. The Water Quality Control Plan for the Colorado River Basin Region of California (Basin Plan), which was adopted on November 17, 1993, and amended on November 16, 2012, designates the beneficial uses of ground and surface waters in this Region.
12. The Facility is located in the Imperial Hydraulic Unit. The designated beneficial uses of ground waters in the Imperial Hydrologic Unit are:
 - a. Municipal supply (MUN); and
 - b. Industrial supply (IND).
13. WDRs implement numeric and narrative water quality objectives for ground and surface waters established by the Basin Plan. The numeric objectives for groundwater designated for municipal and domestic supply are the maximum contaminant levels (MCL), and bacteriological limits specified in Section 64421 et seq. of Title 22, California Code of Regulations (CCR). The narrative objectives

are: Ground water for use as domestic or municipal water supply (MUN) shall not contain taste or odor-producing substances in concentrations that adversely affect beneficial uses as a result of human activity (Basin Plan, page 3-8).

14. This Order establishes WDRs pursuant to Division 7, Chapter 4, Article 4, of the CWC for discharges that are not subject to regulation under Clean Water Act (CWA) section 402 (33 U.S.C. Section 1342).
15. Pursuant to CWC section 13263(g), the discharge of waste is a privilege, not a right, and adoption of this Order does not create a vested right to continue the discharge.

Groundwater Degradation

16. State Water Resources Control Board (State Water Board) Resolution 68-16 ("Policy with Respect to Maintaining High Quality Waters of the State", hereinafter Resolution 68-16) requires a Colorado River Basin Water Board in regulating the discharge of waste to maintain high quality waters of the state (i.e., background water quality) until it is demonstrated that any change in quality will be consistent with maximum benefit to the people of the State, will not unreasonably affect beneficial uses, and will not result in water quality less than as described in plans and policies (e.g., violation of any water quality objective). Moreover, the discharge is required to meet WDRs that result in the best practicable treatment or control (BPTC) of the discharge necessary to assure pollution or nuisance will not occur, and highest water quality consistent with maximum benefit to the people will be maintained.
17. Depth to shallow ground water at the site is about 6 feet below the bottom of the basins and has a TDS content of about 14,000 mg/L
18. There are no domestic wells within 500 feet of the holding basin described in Finding 8, above.
19. Groundwater in the area of the proposed discharge is too saline for municipal use. The Colorado River Basin Water Board finds that groundwater near the site is not and cannot reasonably be expected to be a source of municipal or domestic supply. Consequently, effluent limitations that would be protective of a municipal beneficial use, as prescribed in Title 22, CCR, for nitrogen, pathogens and TDS, are not necessary for this discharge. Therefore, the treated discharge, as regulated by these WDRs, into the recycled process water holding basin, is consistent with applicable water quality objectives in the Basin Plan.
20. The discharge of wastewater into the recycled process wastewater holding basin, as permitted herein, reflects BPTC. The controls assure the discharge does not create a condition of pollution or nuisance, and that water quality will be maintained which is consistent with the anti-degradation provisions of Resolution

68-16.

21. The constituents in recycled process wastewater that present the greatest risk to groundwater are total dissolved salts (TDS) and biological oxygen demand (BOD). The WDRs contained in this Order minimize the risk of degradation to areal groundwater. The Facility contributes to economic development in the area, and washing and processing locally-grown sugar beets instead of transporting them reduces energy consumption and vehicle emissions. These factors are consistent with maximum benefit to the people of the State. Accordingly, the discharge as authorized is consistent with the anti-degradation provisions of Resolution 68-16.

Storm Water

22. Federal regulations for storm water discharges were promulgated by the United States Environmental Protection Agency (USEPA) on November 16, 1990 (40 CFR Parts 122, 123, and 124). The regulations require specific categories of facilities which discharge storm water associated with industrial activity to obtain National Pollutant Discharge Elimination System (NPDES) permits and to implement Best Conventional Pollutant Technology (BCT) to reduce or eliminate industrial storm water pollution.
23. The State Water Resources Control Board (SWRCB) adopted Water Quality Order 97-03-DWQ (General Permit CAS000001) specifying WDRs for discharges of storm water associated with industrial activities, excluding construction activities, and requiring submittal of a Notice of Intent (NOI) by industries to be covered under the Permit (General Industrial permit). On April 1, 2014, the SWRCB adopted a new Industrial General Permit (IGP) which will become effective on July 1, 2015.
24. The Facility may be subject to the federal requirements for regulation of storm water discharges associated with industrial activities since it is one of the industrial activities listed in 40 CFR 122.26(b)(14) and since there's the potential that storm water could be discharged to waters of the U.S.
25. The Discharger states that the Facility is not required to obtain coverage under Order 97-03-DWQ based on item 4.b. of the section titled, "Types of Discharges not Covered by this Permit," or under the new IGP 2014-0057-DWQ based on Section II.A.2.d.ii. The Discharger is certain that no discharge of storm water to surface waters would occur under any circumstances. Colorado River Basin Water Board staff concurs. Therefore, the Discharger is not required to obtain coverage under Order 97-03-DWQ for the Facility.

CEQA and Public Participation

26. In accordance with Section 15301, Chapter 3, Title 14 of the California Code of

Regulations, the issuance of these WDRs, which govern the operation of an existing facility involving negligible or no expansion of use beyond that previously existing, is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.).

27. It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This order promotes that policy by requiring discharges to meet maximum contaminant levels designed to protect human health and ensure that water is safe for domestic use.

28. The Colorado River Basin Water Board has notified the Discharger and all known interested agencies and persons of its intent to draft WDRs for this discharge, and has provided them with an opportunity for a public meeting and an opportunity to submit comments.

29. The Colorado River Basin Water Board, in a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, that Board Order R7-2003-0016 is rescinded except for enforcement purposes, and in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, the Discharger shall comply with the following:

A. Prohibitions

1. The direct discharge of any waste or wastewater to any surface waters or surface drainage courses is prohibited.
2. The discharge of waste to land not owned or controlled by the Discharger is prohibited.
3. Discharge of wastewater at a location or in a manner different from that described in Findings 3 through 7 above is prohibited.
4. The Discharger shall not discharge waste in excess of the design capacity of the disposal system.

B. Specifications

1. The treatment or disposal of wastes at this facility shall not cause pollution or nuisance as defined in sections 13050(l) and 13050(m), respectively, of Division 7 of the California Water Code.
2. A minimum depth of freeboard of two (2) feet shall be maintained at all times in the recycled water holding basin.

3. The recycled water holding basin shall be protected from any washout or erosion of wastes or covering material, and from any inundation which could occur as a result of floods having a predicted frequency of once in 100 years.
4. The recycled water holding basin shall be managed to prevent breeding of mosquitoes, in particular,
 - a. An erosion control program should assure that small coves and irregularities are not created around the perimeter of the water surface.
 - b. Weeds shall be minimized through control of water depth, harvesting, or herbicides.
 - c. Dead algae, vegetation, and debris shall not accumulate on the water surface.
5. Public contact with the recycled water holding basin shall be precluded through such means as fences, signs, and other acceptable alternatives.
6. The discharge shall not cause degradation of any water supply.

C. Provisions

1. The Discharger shall comply with all of the conditions of this Board Order. Noncompliance is a violation of the Porter-Cologne Water Quality Control Act (CWC, § 13000 et seq.), and grounds for enforcement action.
2. The Discharger shall comply with Monitoring and Reporting Program R7-2015-0023, and future revisions thereto, incorporated herein and made a part of this Order, as specified by the Colorado River Basin Water Board's Executive Officer.
3. Prior to any modifications in this facility which would result in material change in the quality or quantity of wastewater treated or discharged, or any material change in the location of discharge, the Discharger shall report all pertinent information in writing to the Colorado River Basin Water Board and obtain revised requirements before any modifications are implemented.
4. Prior to any change in ownership or management of this operation, the Discharger shall transmit a copy of this Board Order to the succeeding owner/operator, and forward a copy of the transmittal letter to the Colorado River Basin Water Board.
5. The Discharger shall ensure that all site operating personnel are familiar with the content of this Board Order, and shall maintain a copy of this Board Order at the site.

6. The Discharger shall allow the Colorado River Basin Water Board's Executive Officer, or his/her authorized representative, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the premises where a regulated facility or activity is located or conducted, or the place where records must be kept under the conditions of this Board Order;
 - b. Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this Board Order;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Board Order; and
 - d. Sample or monitor at reasonable times, for the purpose of assuring compliance with this Board Order or as otherwise authorized by the California Water Code, any substances or parameters at this location.
7. The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Discharger to achieve compliance with this Board Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a discharger only when necessary to achieve compliance with the conditions of this Board Order.
8. This Board Order does not convey any property rights of any sort or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
9. Unless otherwise approved by the Colorado River Basin Water Board's Executive Officer, all analyses shall be conducted at a laboratory certified for such analyses by the State Water Resource Control Board's Division of Drinking Water. All analyses shall be conducted in accordance with the latest edition of "Guidelines Establishing Test Procedures for Analysis of Pollutants", promulgated by the United States Environmental Protection Agency.
10. Adequate measures shall be taken to assure that flood or surface drainage waters do not erode or otherwise render portions of the discharge facilities inoperable.
11. Adequate measures shall be taken to assure that unauthorized persons are effectively excluded from contact with the wastewater disposal facilities.
12. The Discharger is the responsible party for the waste discharge requirements and the monitoring and reporting program for the facility. The Discharger shall

comply with all conditions of these waste discharge requirements. Violations may result in enforcement actions, including Colorado River Basin Water Board Orders or court orders, requiring corrective action or imposing civil monetary liability, or in modification or revocation of these waste discharge requirements by the Colorado River Basin Water Board.

13. The Discharger shall retain records of all monitoring information including all calibration and maintenance records, copies of all reports required by this Board Order, and records of all data used to complete the application for this Board Order. Records shall be maintained for a minimum of three years from the date of the sample, measurement, or report. This period may be extended during the course of any unresolved litigation regarding this discharge or when requested by the Colorado River Basin Water Board's Executive Officer.
14. The Discharger may be required to submit technical reports as directed by the Colorado River Basin Water Board's Executive Officer.
15. The Discharger shall provide adequate notice to the Colorado River Basin Water Board's Executive Officer of the following events. Adequate notice shall include information on the quality and quantity of effluent introduced, and any anticipated impact of the change on the quantity or quality of the Discharger's effluent and/or sludge.
 - a. Any new introduction of pollutants into any of the treatment facilities described in the Findings of this Board Order from an indirect Discharger which would be subject to Section 301 or 306 of the Clean Water Act, if it were directly discharging the pollutants.
 - b. Any substantial change in the volume or character of pollutants being introduced into any of the treatment facilities described in the Findings of this Board Order by an existing or new source.
 - c. Any planned physical alterations or additions to the facilities described in this Board Order, or changes planned in the Discharger's waste reuse or disposal practice, where such alterations, additions, or changes may justify the application of Board Order conditions that are different from or absent in the existing Board Order, including notification of additional disposal sites not reported during the Board Order application process, or not reported pursuant to an approved land application plan.
16. The Discharger shall report all instances of noncompliance. Reports of noncompliance shall be submitted with the Discharger's next scheduled self-monitoring report or earlier if requested by the Colorado River Basin Water Board's Executive Officer, or if required by an applicable standard for sludge use and disposal.

17. This Board Order may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Discharger for a Board Order modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any Board Order condition. Causes for modification include the promulgation of new regulations, modification of land application plans, or modification in sludge use or disposal practices, or adoption of new regulations by the State Water Board or the Colorado River Basin Water Board, including revisions to the Basin Plan.

I, Robert Perdue, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Colorado River Basin Region, on May 13, 2015.

Ordered By: Original signed by
ROBERT PERDUE
Executive Officer

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

MONITORING AND REPORTING PROGRAM R7-2015-0023
FOR
SPRECKELS SUGAR COMPANY, INC.
OWNER/OPERATOR
SUGAR BEET PROCESSING FACILITY
RECYCLED PROCESS WATER HOLDING BASIN
Brawley – Imperial County

Location of Discharge:
W ½ of the NW ¼ of Section 29 and N ½ of Section 30, T14S, R14E SBB&M

MONITORING

1. This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater system and groundwater quality (when needed). This MRP is issued pursuant to California Water Code (Water Code) section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer.

2. Water Code section 13267 states, in part:

“In conducting an investigation specified in subdivision (a), the Colorado River Basin Water Board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.”

3. Water Code section 13268 states, in part:

“(a) (1) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of § 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of Section 13399.2, or falsifying any information provided therein, is

guilty of a misdemeanor, and may be liable civilly in accordance with subdivision (b). (b) (1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with § 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.”

4. The Discharger owns and operates the wastewater system that is subject to Board Order R7-2015-0023. The reports are necessary to ensure that the Discharger complies with the Order. Pursuant to Water Code section 13267, the Discharger shall implement the MRP and shall submit the monitoring reports described herein.
5. All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The time, date, and location of each grab sample shall be recorded on the sample chain of custody form. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Colorado River Basin Water Board staff.
6. Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that:
 - a. The user is trained in proper use and maintenance of the instruments;
 - b. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
 - c. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
 - d. Field calibration reports are submitted as described in the “Reporting” section of this MRP.
7. The collection, preservation and holding times of all samples shall be in accordance with United States Environmental Protection Agency (USEPA) approved procedures. Unless otherwise approved by the Colorado River Basin Water Board Executive Officer, all analyses shall be conducted by a laboratory certified by the Environmental Laboratory Accreditation Program, Division of Drinking Water, State Water Resources Control Board. All analyses shall be conducted in accordance with the latest edition of the “Guidelines Establishing Test Procedures for Analysis of Pollutants” (40 CFR Part 136), promulgated by the USEPA.

8. Samples shall be collected at the locations specified in this Board Order. If no locations are specified, sampling shall be conducted at the most representative sampling point available.
9. If the facility is not in operation, or there is no discharge during a required reporting period, the Discharger shall forward a letter to the Colorado River Basin Water Board indicating that there has been no activity during the required reporting period.

EFFLUENT MONITORING

A sampling station shall be established at the point of discharge and shall be located where representative samples of effluent can be obtained. Samples shall be taken at a time when the discharge contains wastewater which has a representative mixture of the wastewaters being recycled. Wastewater discharged into the recycled process water holding basin shall be monitored at the peak of the operating season for the following constituents:

<u>Constituent</u>	<u>Units</u>	<u>Sample Type</u>	<u>Sampling Frequency</u>
Total Dissolved Solids	mg/L ¹	Grab	annually ²
Total Suspended Solids (TSS)	mg/L	Grab	annually
pH	pH units	Grab	annually
20°C BOD5	mg/L	Grab	annually
Discharge Flow	MGD	Estimate	daily

HOLDING BASIN MONITORING

Wastewater contained in the recycled process water holding basin shall be monitored at the peak of the operating season for constituents as indicated below. A single composited sample shall be composed of grab samples collected in equal volumes at a minimum of two locations in the basin, preferable at the corners of the basin opposite the discharge pipe.

¹ mg/L – milligrams per Liter

² Annual samples shall be collected during the peak of the operating season

<u>Constituent</u>	<u>Units</u>	<u>Sample Type</u>	<u>Sampling Frequency</u>
Total Dissolved Solids (TDS)	mg/L	Grab	annually
pH	pH units	Grab	annually
20°C BOD5	mg/L	Grab	annually

REPORTING

1. The Discharger shall arrange the data in tabular form so that the specified information is readily discernible. The data shall be summarized in such a manner as to clearly illustrate whether the facility is operating in compliance with waste discharge requirements.
2. Records of monitoring information shall include:
 - a. The date, exact place, and time of sampling or measurement(s);
 - b. The individual(s) who performed the sampling or measurement(s);
 - c. The date(s) analyses were performed;
 - d. The individual(s) who performed the analyses;
 - e. The analytical techniques or method used; and
 - f. The results of such analyses.
3. The results of any analysis taken, more frequently than required at the locations specified in this Monitoring and Reporting Program shall be reported to the Colorado River Basin Water Board.
4. Monitoring reports shall be certified under penalty of perjury to be true and correct, and shall contain the required information at the frequency designated in this monitoring report.
5. Each report shall contain the following statement:

"I declare under the penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the

possibility of a fine and imprisonment for knowing violations".

6. A duly authorized representative of the Discharger may sign the documents if:
 - a. The authorization is made in writing by the person described above;
 - b. The authorization specified an individual or person having responsibility for the overall operation of the regulated disposal system; and
 - c. The written authorization is submitted to the Colorado River Basin Water Board's Executive Officer.
7. Reporting of any failure in the facility (wastewater treatment plant, and collection and disposal systems) shall be as described in Provision No. 10. Results of any analysis performed as a result of a failure of the facility shall be provided within ten (10) days after collection of the samples.
8. The Discharger shall attach a cover letter to the Self-Monitoring Report. The information contained in the cover letter shall clearly identify violations of the WDRs, discuss corrective actions taken or planned and the proposed time schedule of corrective actions. Identified violations should include a description of the requirement that was violated and a description of the violation.
9. Daily, semi-weekly and monthly monitoring reports shall be submitted to the Colorado River Basin Water Board by the 15th day of the following month. Quarterly monitoring reports shall be submitted to the Colorado River Basin Water Board by January 15, April 15, July 15, and October 15, of each year. Annual monitoring reports shall be submitted to the Colorado River Basin Water Board by January 15 of each year.
10. The Discharger shall submit, technical monitoring and all documents that are normally mailed by the Discharger, such as regulatory documents, submissions, materials, data, and correspondence electronically. All information required to be submitted in accordance to this Board Order must be emailed prior to the regulatory due date. To accomplish electronic submittal of documents the Discharger shall convert the signed original report to Portable Document Format (PDF), other appropriate Microsoft application, such as Excel documents may also be emailed. Email all the documents to RB7-wdrs_paperless@waterboards.ca.gov. Documents that are 50 MB or larger should be transferred to a disk and sent mailed to:

California Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring Drive, Suite 100

Spreckels Sugar Company, Inc.
Recycled Process Water Holding Basin

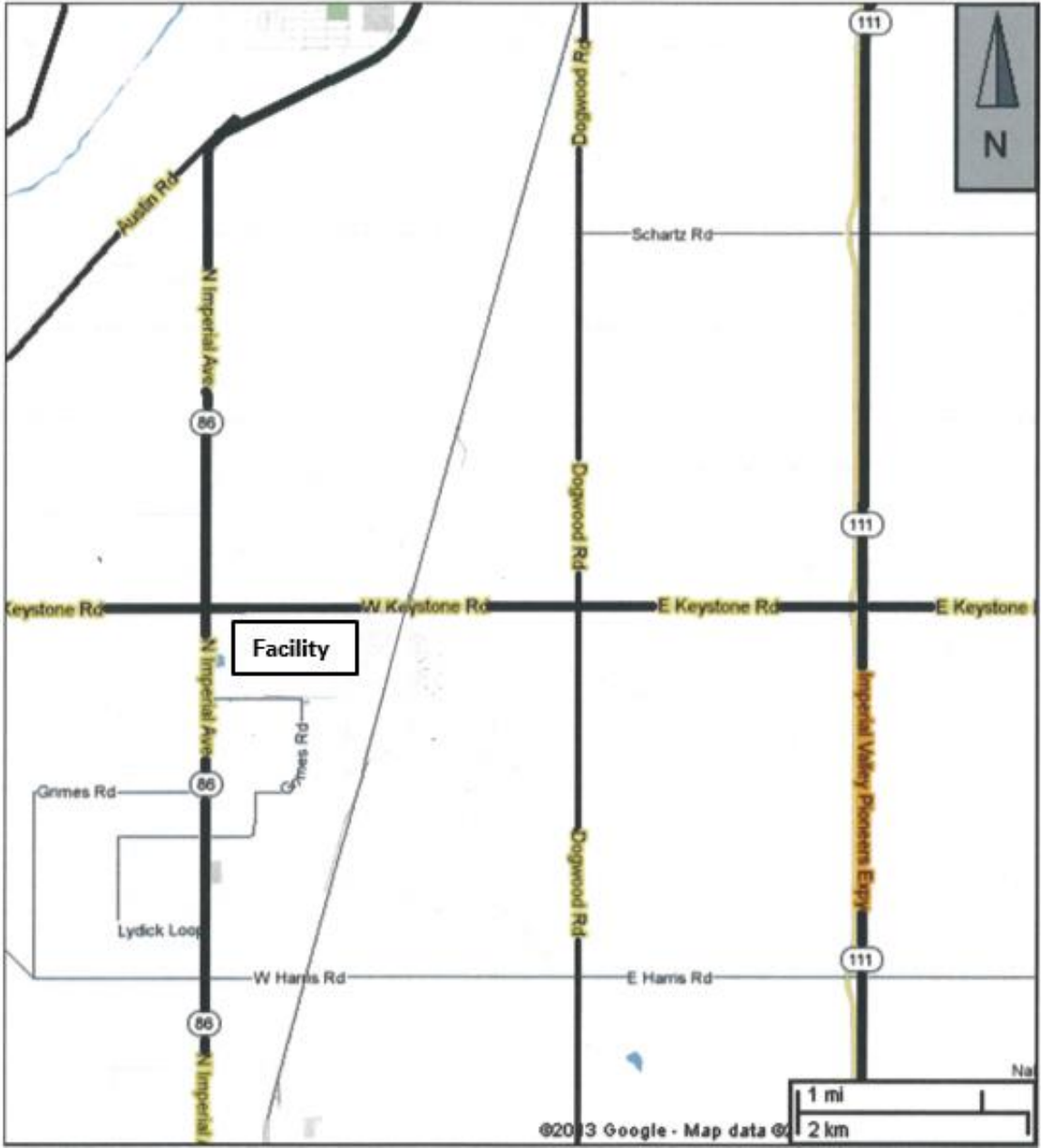
Palm Desert, CA 92260

Board Order R7-2015-0023
Monitoring and Reporting Program

Ordered by: Original signed by
Robert Perdue
Executive Officer

on May 13, 2015
Date

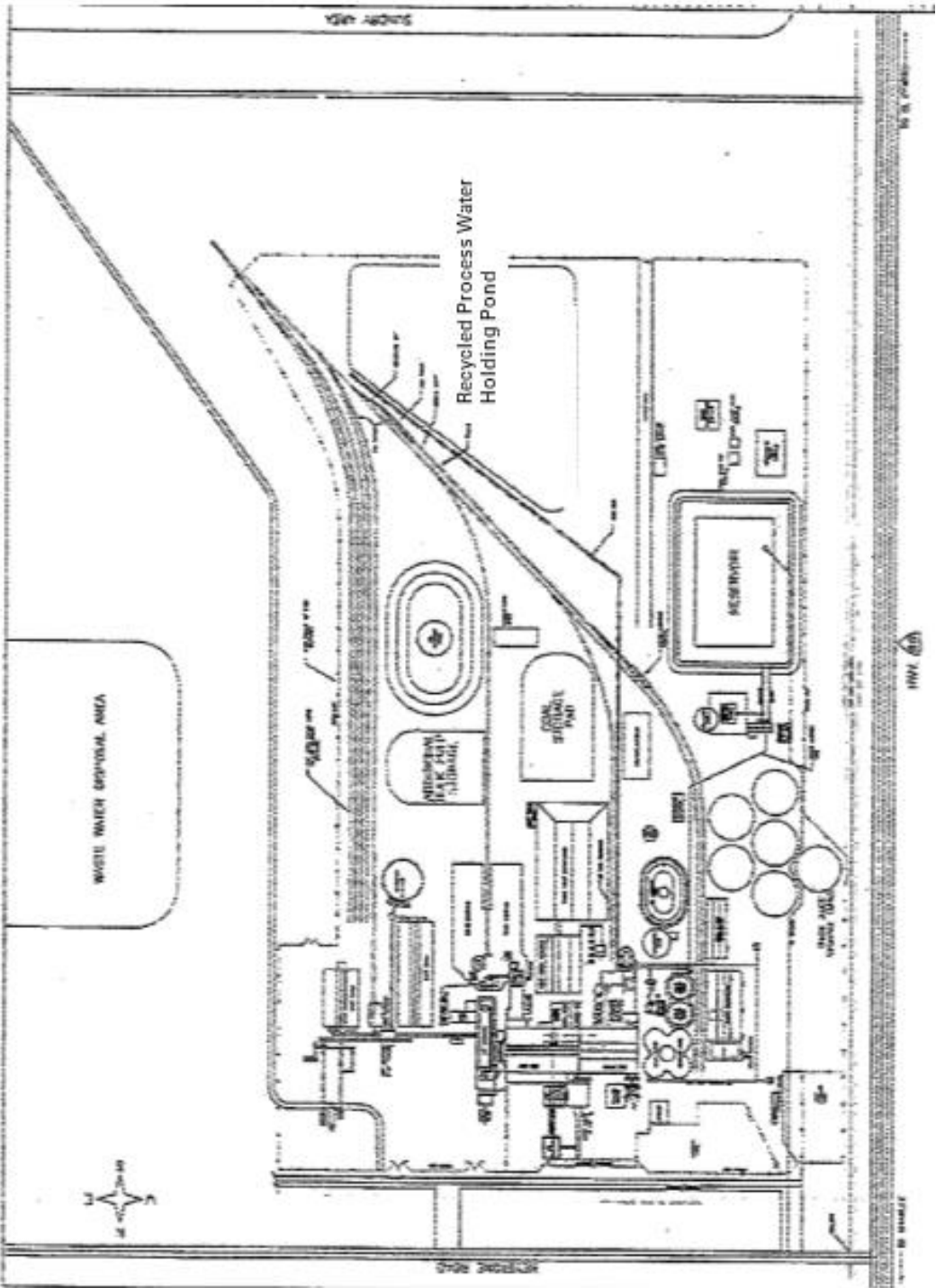
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION



Board Order R7-2015-0023

ATTACHEMENT A – SITE LOCATION MAP
SPRECKELS SUGAR COMPANY, INC., OWNER/OPERATOR
RECYCLED WATER HOLDING BASIN
Brawley - Imperial County,
N 1/2 of Section 30 and W 1/2 of the NW 1/4 of Section 29, T14S R14E, SBB&M

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION



ATTACHEMENT B – SITE LAYOUT SHOWING HOLDING BASIN LOCATION
SPRECKELS SUGAR COMPANY, INC., OWNER/OPERATOR
RECYCLED WATER HOLDING BASIN

Brawley - Imperial County,
N 1/2 of Section 30 and W 1/2 of the NW 1/4 of Section 29, T14S R14E, SBB&M