



California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
<http://www.dfg.ca.gov>
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005

ARNOLD SCHWARZENEGGER, Governor

DONALD KOCH, Director



March 25, 2010

Ms. Aide Ortiz
California Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, California 93706

Subject: Tentative Waste Discharge Requirements (NPDES No. CA082511) for
AAF-McQuay, Inc., Et. Al. Ground Remediation System Tulare County

Dear Ms. Ortiz:

The California Department of Fish and Game (Department) has reviewed the above document. AAF-McQuay, Inc. (Discharger) is currently discharging according to Order No. R5-2005-0059, National Pollutant Discharge Elimination System Permit No. CA0082511.

As described in the Waste Discharge Requirements (WDR), Attachment F, F-4, Facility Description and former ownerships in the "west" parcel, "From 1966 to 1982, the Bostitch Division of Textron, Inc. manufactured nail and staple products and fastening devices. In 1986, Stanley Works started manufacturing nail products and discharged rinse waters containing residual solution from acid and alkaline baths into dry wells. In the "east" parcel, from 1961 to 1974, McQuay Perfex Corporation manufactured heating, ventilation and air conditioning equipment. From 1976 to 1982, SSP Agricultural Equipment, Inc. manufactured wind machine parts. From 1982 to 1996, SunStar Plastics Engineering Corporation and Pepco Water Conservation Products Inc., used the plant to manufacture extruded plastic products."

The Discharger owns and operates a groundwater remediation system. The groundwater remediation system consist of two dual-vessel granular activated carbon treatment systems, up to eleven extraction wells and three discharge points. Treated groundwater discharged from Discharge Point 002 is discharged to agricultural lands. Treated groundwater discharged at Discharge Points 001 and 003 is discharged to Mill Creek Ditch, a water of the United States, a tributary to Cross Creek, located within the South Valley Floor Hydrologic Unit.

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On the WDR, page 8, Table 6, Effluent Limitations, a maximum daily effluent limitation is listed for various parameters. On Attachment E, E5, Table E-3, Effluent Monitoring, the minimum sampling frequency for the listed parameters are either once per month or once per quarter. Four or twelve data points per year are not representative of the discharged water. The sampling frequency (Table E-3) does not match the thresholds timelines (i.e. average monthly and maximum daily) (Table 6).

All too often, laboratory results come well after the water was discharged. If an event occurred the wastewater is long gone before corrective measures can be taken. The Department recommends that the sampling frequency be increased and the following be added to the WDR: Effluent laboratory results are in hand and verified **before** the water is discharged into the Mill Creek Ditch.

If you have any questions regarding these comments, please contact Rachel McNeal, Environmental Scientist, at 559-243-4014, extension 256.

Sincerely,

Andrew G. Gordus, Ph.D.

for

Jeffrey Single, Ph.D.
Regional Manager