

October 26, 2015

Katie Carpenter, Engineering Geologist
California Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

Re: Comments - Tentative WDRs for Ventura Coastal, LLC Tipton Citrus Juice Plant - Tulare County

Dear Ms. Carpenter,

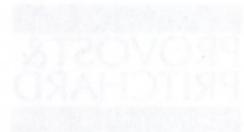
On behalf of Ventura Coastal, LLC and their approval, the following comments are provided with regards to the Tentative Waste Discharge Requirements. The comments reflect changes in operations and management enacted in conjunction with the transition of facility ownership to Ventura Coastal, LLC and the leasing of the land application area to Cox Farming (since 2012).

Tentative Waste Discharge Requirements

1. Page 4 - Item 18: "...81.6 acres (Plot 2), 94 acres (Plot 3), and 72.4 acres (Plot 4). Plots 2, 3 and 4 are further divided in half for a total of six land application fields, ranging from 30-40 acres each."
2. Page 4 - Item 19 Replace the entire item: "According to the Discharger's Management Plan, wastewater was applied to all three plots as pre-irrigation prior to planting in the spring. The rest of the time, wastewater was applied to one or two of the plots on rotation, while the other plots were actively farmed and irrigated with a mix of fresh water and wastewater. Based on the Discharger's self-monitoring data, from 2013 through 2014, wastewater was discharged predominantly to Plot 4 (72.4 acres) with occasional applications to Plot 2 and no crops were reportedly grown within the plot receiving only wastewater. Conversely, the log of field applications of wastewater from January 2013 to July 2015 specifies that wastewater was applied to all plots and subplots on rotation. Future management plans and self monitoring reports will reflect shifts in cropping and wastewater application practices under field management."
3. Page 5 - Item 20: "... The concentration of the Plant's wastewater ~~on only one plot~~ and the uneven application..."
4. Please note that Cox Farming has laser leveled the fields and shortened the irrigation checks to increase irrigation distribution uniformity.

Information Sheet

5. Page 1- Paragraph 4. "According to the Discharger, the influent pumps to the ponds were damaged in 2013 and the discharge bypassed the ponds and was sent directly to the land application areas from ~~March 2013~~ ~~May of 2013~~ to August of 2015."
6. Page 2-Paragraph 3. "Plots 2 through 4 make up the 248-acre land application area, which is divided into three fields ranging in size from approximately 81.6 acres (Plot 2), 94 acres (Plot 3),



and 72.4 acres (Plot 4). Each Plot is further divided in half for a total of six fields, ranging from 30-40 acres each. ~~The Plots-As of 2008 the plots were are~~ divided into long checks (approximately 110 feet wide by 2,600 feet long), ~~however in 2012 the land application areas were laser leveled and checks were shortened.~~ Historically, wastewater was applied to all three plots as pre-irrigation water prior to planting in the spring. The rest of the time wastewater was applied to one or two of the plots, while the other ~~two~~ plot(s) were actively farmed and irrigated with a mix of fresh water and wastewater. ~~and no crops were grown within the plot receiving the wastewater. According to the Discharger's self-monitoring reports, from 2013 through 2014 wastewater was discharged predominantly to Plot 4 (72.4 acres) with occasional applications to Plot 2.~~

Respectfully,

Donald Ikemiya, RCE 56,630

Velvet Gaston, EIT