

Hatton, Scott@Waterboards

From: Tim Souther <Tim.Souther@amec.com>
Sent: Thursday, August 02, 2012 2:27 PM
To: Hatton, Scott@Waterboards
Cc: Howard Barlow; cperez@pomwonderful.com; Harvey, Dale@Waterboards; Wass, Lonnie@Waterboards
Subject: RE: POM Wonderful Tentative WDRs and MRP

Cruz and I have reviewed your notes and concur.

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From: Hatton, Scott@Waterboards [<mailto:Scott.Hatton@waterboards.ca.gov>]
Sent: Wednesday, August 01, 2012 4:24 PM
To: cperez@pomwonderful.com; Barlow, Howard; Souther, Tim
Cc: Wass, Lonnie@Waterboards; Harvey, Dale@Waterboards
Subject: POM Wonderful Tentative WDRs and MRP

Cruz, Howard, and Tim –

It was nice meeting with you today regarding the POM Wonderful facility in Del Rey. Below is a summary of meeting. Let me know if I captured all of your comments.

Meeting Date: 1 August 2012; 2:00 PM

Meeting Location: 1685 E Street, Fresno, CA 93706

Meeting Attendees: Cruz Perez (POM Wonderful)
Howard Barlow (AMEC)
Tim Souther (AMEC)
Lonnie Wass (RWQCB)
Scott Hatton (RWQCB)

Comments on Tentative Waste Discharge Requirements

1. Finding 3, page 1 – the APN number for the facility is incorrect; update accordingly. Also add the APN for the land application area.
2. Attachment A – the portion of the sludge application area southwest of the former railroad track will no longer be available for sludge or wastewater application due to the construction of an airstrip at that location. Revise the figure on Attachment A accordingly.

Comments on Tentative Monitoring and Reporting Program

1. Effluent Monitoring – eliminate ammonia as N and total dissolved solids from the Constituent/Parameter list. Revise frequency for General Minerals monitoring to once every 5 years or following a process change at the facility.

2. Groundwater Monitoring – eliminate ammonia as N and total organic carbon from the Constituent/Parameter list. Reduce analytical suite for General Minerals to only include chloride and sulfate.
3. Source Water Monitoring – revise frequency for General Minerals monitoring to once every 5 years.
4. Soil Monitoring – Eliminate sodium and chloride from the Constituent/Parameter list. Revise the Sample Type to be a composite of all samples collected at a given depth interval.
5. Reporting – Require the Discharger to include in quarterly monitoring reports any anticipated process changes to the facility that will require General Minerals monitoring more frequently than once every 5 years.

Comments on Information Sheet

1. Page 6, bullets a) and b) – change “is” to “its” in the last sentence.

Comments to Initial Study

1. Page 8 – revise the figure to show that the land application area does not extend south of Clayton Avenue.

General Questions

1. Which BOD loading rate required by the MRP (either “day of application” or “cycle average”) will be used for compliance purposes? Specification D.4 of the WDRS (page 17) indicates cycle average.

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