

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 5-6 December 2013**

**Response to Written Comments for Olam West Coast, Inc.
Onion Dehydrator
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 5 and 6 December 2013, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) for Olam West Coast, Inc. This document contains responses to written comments received from interested parties regarding the Tentative WDRs (TWDRs) initially circulated on 22 August 2013. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 26 September 2013 to receive full consideration. Comments were received by Olam West Coast, Inc., (Olam).

Written comments Olam are summarized below, followed by the responses of the Central Valley Water Board staff. Central Valley Water Board staff also made some minor changes to the TWDRs to improve clarity.

OLAM WEST COAST, INC., (OLAM) COMMENTS

Olam submitted a 30 August 2013 letter regarding the TWDRs. On 16 September 2013, Olam provided information to clarifying comment number four of the 30 August 2013 letter regarding tile drainage monitoring. Then, on 25 September 2013, Olam submitted additional comments via email.

30 August 2013 Letter – COMMENT No. 1: Olam requests that Finding 6 of the TWDRs be revised to describe the correct capacity of the holding tank as 5,000 gallons.

RESPONSE: The change has been made.

30 August 2013 Letter – COMMENT No. 2: Olam requests Finding 7 of the TWDR be modified to describe that silt material from the unlined ponds has historically been used as fill material by nearby farmers as well as on the 208-acre land application area.

RESPONSE: Finding 7 of the TWDRs has been modified to describe the application of silt to the land application area owned by Olam and its historical use as fill material by local farmers. In addition, the TWDRs include solids monitoring requirements that require characterization of all solids including silt. The TWDRs include a provision requiring the Discharger to submit a Solids Management Plan that describes and evaluates all its solids disposal practices. The plan is subject to Executive Officer approval.

30 August 2013 Letter – COMMENT No. 3: Olam requests that the language in Pond Monitoring of the Monitoring and Reporting Program be changed to allow another permanent method of record keeping (i.e. electronic) instead of a bound logbook.

RESPONSE: The change has been made.

30 August 2013 Letter – COMMENT No. 4: Olam states that it cannot monitor tile drainage sumps DP-40 and DP-41, as required by the Tile Drainage Monitoring section of the Monitoring and Reporting Program, because it does not have ownership or control over these sumps. According to the 16 September 2013 email, Olam has spoken to the Panoche Drainage District, regarding the sampling of sumps DP-40 and DP-41. Panoche Drainage District stated that sumps DP-40 and DP-41 are privately owned and the property owner is not required to run the pumps. In addition, the current property where the sumps are located is in escrow, making it difficult for Olam to negotiate an agreement with the future property owner to have access to sumps DP-40 and DP-41.

RESPONSE: The change has been made. Tile Drainage Monitoring section of the Monitoring and Reporting Program has been modified to remove the monitoring of sumps DP-40 and DP-41. As an alternative, a provision has been included in the TWDRs that requires Olam to submit a work plan to evaluate different groundwater monitoring alternatives. The work plan shall include a time schedule that shows dates by which Olam will implement the chosen groundwater monitoring alternative to determine the potential impacts of the discharge on groundwater. Both the work plan and time schedule shall be subject to Executive Officer approval.

25 September 2013 Email – COMMENT No. 1: Provision F.12 of the TWDRs requires Olam to submit a Salinity Management Plan 120 days following Order adoption. The plant generally does not operate during this period. Olam requests that Provision F.12 of the tentative WDRs be revised to read “the Salinity Management Plan is due 120 days following first discharges under the new permit (approximately May 2014)” so that it can collect appropriate data when the plant is in operation.

RESPONSE: The change has been made. Provision F.12 of the tentative WDRs will require Olam to submit a Salinity Management Plan 270 days following Order adoption, approximately 120 days after the processing season starts in May 2014.