

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 23-24 June 2016**

**Response to Written Comments for
ARO Pistachios, Inc and
Mehdi Orandi
Terra Bella Processing Facility
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 23 and 24 June 2016, the Central Valley Water Board will consider prescribing Waste Discharge Requirements (WDRs) for ARO Pistachios, Inc. and Mehdi Orandi's Terra Bella Processing Facility (Facility). This document contains responses to written comments received from designated parties and interested persons regarding the tentative WDRs that were initially circulated on 24 March 2016. Written comments were required by public notice to be received by the Central Valley Water Board by 25 April 2016 to receive full consideration. ARO Pistachios submitted written comments.

The written comments are summarized below, followed by the responses of the Central Valley Water Board staff. Central Valley Water Board staff made some changes to the tentative WDRs based on comments and to improve clarity and fix typographical errors.

ARO PISTACHIOS INC (ARO) COMMENTS

On 21 April 2016, ARO Pistachios Inc submitted comments for the tentative Waste Discharge Requirements via email.

ARO COMMENT NO. 1: ARO requests that the installation of the groundwater monitoring well network required by Provision G.12 of the tentative WDRs not be required. Instead, ARO proposes to evaluate existing water supply wells and/or irrigation wells at and around the Facility and land application area (LAA) to determine underlying groundwater quality. ARO proposes to use the two irrigation wells on Ranch 2 and one irrigation well on Ranch 1 for groundwater monitoring. Additionally, ARO requests that the groundwater monitoring frequency in the Monitoring and Reporting Program be reduced from quarterly to annually.

RESPONSE: Currently, there are no groundwater monitoring wells at the Facility and at the LAA's that can be used to determine the quality of groundwater and evaluate any impacts resulting from the discharge. Based on historical data from nearby wells, the Facility is an area of good quality groundwater that meets water quality objectives for municipal and domestic supply. ARO has not provided technical information that shows otherwise.

Provision G.12 of the tentative WDRs has been modified to allow ARO to submit a work plan for Executive Officer approval that shall contain proposed measures to monitor the quality of groundwater. If existing supply wells and/or irrigation wells are proposed, all existing wells proposed for inclusion in the groundwater monitoring network shall have known construction details and be capable of monitoring first encountered groundwater to determine the effect of present and future discharges on first encountered groundwater. In

addition, the time schedule in Provision G.12 has been extended by an additional two years to allow ARO additional time to collect and evaluate groundwater data.

The groundwater monitoring frequency will remain on a quarterly basis. After one year of stable data, ARO may request a reduction in monitoring frequency from quarterly to annually, which may be approved by the Executive Officer.

ARO COMMENT NO. 2: Effluent limitation B.2 of the TWDRs set an effluent EC limit of 1,000 umhos/cm. ARO requests that no effluent EC limit be set for the proposed project based on the Basin Plan exemption for food processing industries that exhibit a disproportionate increase in EC due to unavoidable concentrations of organic dissolved solids from the raw food product. According to ARO, impacts to groundwater will be minimized by the implementation of a Wastewater and Nutrient Management Plan (Provision G.11) and Salinity Management Plan (Provision G.10) similar to other pistachio processing facilities.

RESPONSE: No change has been made. Based on limited data available from nearby wells as shown in Table 8 and 9 of the TWDRs, groundwater is of good quality in the area. ARO has not provided the Central Valley Water Board with technical information to demonstrate that underlying groundwater in the area is not of good quality and the Basin Plan limit of 1,000 umhos/cm EC is not applicable to this discharge.

The TWDRs are written to allow ARO a five-year time period to monitor the quality of groundwater and determine if the effluent EC limit of 1,000 umhos/cm is applicable. If groundwater monitoring shows that groundwater below the Facility and LAA's is of good quality, then the effluent EC limit of 1,000 umhos/cm will take effect, otherwise, the effluent EC limit of 1,000 umhos/cm will not take effect. ARO will not need to comply with the effluent EC limit until after five years and only if results show that underlying groundwater is of good quality.

ARO COMMENT NO. 3: ARO request that Attachment A (Facility Map) of the TWDRs be updated to reflect the current assessor parcel numbers for Ranch 2.

RESPONSE: The change has been made.