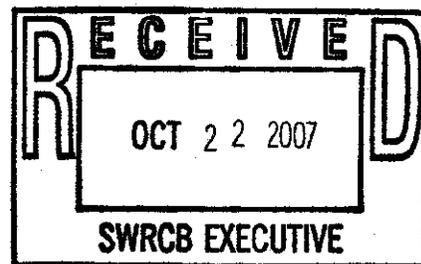


October 22, 2007

Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter Regarding the Proposed Water Recycling Policy

Dear Ms. Townsend:

The California League of Food Processors (CLFP) is a trade association that represents fruit and vegetable processing operations located in California. Food processors use about 30 billion gallons of water each year to wash, handle, process, and cook products and to sanitize their facilities. As a result, processors discharge a significant amount of wastewater. The wastewater is not hazardous waste or industrial waste, but it can contain elevated levels of organic material and salts. About 30 percent of the total volume of wastewater is sent to public treatment works and the rest is used to irrigate crops or pasture land.

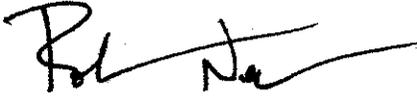
CLFP strongly supports water recycling, but it believes that food processors should not be included within the regulatory scope of the proposed Water Recycling Policy for the following reasons:

1. The wastewater discharged by processors does not meet the definition of "recycled water" as described in Water Code Section 13050(n) in that it is not "a result of treatment of waste." The wastewater is the result of manufacturing activity.
2. Paragraph 5 of the proposed policy states that "recycled water irrigation projects are defined as those projects that use recycled water primarily to meet a water supply need, instead of a disposal need." Land application of food processing wastewater is essentially a disposal activity, the wastewater cannot be used as a primary source of water supply.
3. Land application is already regulated by waste discharge requirements (WDR) issued by the regional water quality control boards. WDR guidelines recently issued by the Central Valley Regional Water Quality Control Board outline the permit issuance decision making process, and describe the conditions that must be met by dischargers with special emphasis on salinity management. Additional regulation by the State Water Board is not necessary.
4. CLFP has developed a comprehensive technical manual that describes the best practices that should be implemented by food processors to ensure proper management of wastewater land application. The Manual contains extensive guidance regarding salinity and soil nutrient management. The Manual has become the industry standard and is used as the key reference for both processors and regulators.

CLFP would also like to request that a change be made in the State Water Board's Draft Staff Report. There is a reference in page two of the text that indicates that food processors are a "major source of salt" in many groundwater basins. This statement is not true. CLFP is aware of analysis recently conducted by the State Water Board regarding the Sacramento, Tulare, and San Joaquin basins, the area where most food processors are located. The data indicates that industrial dischargers collectively account for less than one percent of the total annual salt load added to the three basins. Food processors are only a small subset of the "industrial" discharger category and so they are not a major source of salt in central California, or anywhere else in the state. It is important that this misperception of the food processing industry be clarified.

CLFP appreciates your consideration of these comments, if you have any questions please contact me.

Sincerely,



Rob Neenan
Director of Regulatory Affairs

CC: Gordon Innes, State Water Resources Control Board