

From: "Dan Hinrichs" <dandjh@hughes.net>
To: "Anne Olson" <aolson@waterboards.ca.gov>, "John Alexander"
john@colibriridge.com
Date: 8/31/2009 8:30 AM
Subject: Fw: Comments on small food processor and winery waiver
Attachments: signed cover letter.pdf; Comments, 31aug09.pdf

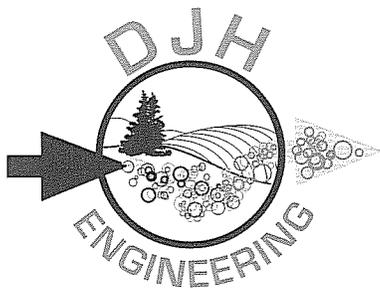
Good Morning Anne,

I have enclosed my comments with a cover letter.

As I mentioned, this was done on behalf of the El Dorado Winery Association.

Dan,

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August 31, 2009

Ms. Anne Olson, P.E.
Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

RE: Comments on Proposed Waiver for Small Food Processors & Wineries

Dear Ms. Olson:

The attached comments were prepared on behalf of the El Dorado Winery Association (EDWA). EDWA represents over 30 wineries within El Dorado County. Nearly all of these wineries are small enough to qualify for the proposed permit waiver.

The proposed waiver is reasonable but there is no provision for those that have been enrolled in the previous program and have faithfully submitted their annual reports. Although there is no provision for "Grandfather from the old waiver", those that have completed the program requirements should be able to enroll using the previously submitted documents, provided that they have complied with annual reporting. By doing this Water Board staff time will be minimal and the enrollment fee could be waived. It would be good to have something that rewards those that do a good job with permitting and compliance.

EDWA would also like to make a presentation at the Board meeting when the waiver is heard.

Please call if you have any questions.

Sincerely,

Dan Hinrichs, P.E.

CC: John Alexander

Conditional Waiver of Waste Discharge Requirements for Small Food Processors and Small Wineries within the Central Valley Region

COMMENTS

31AUG09

1. This is needed to prevent economic hardship for small food processors and wineries that would need waste discharge permits.
2. There are a number of wineries and food processors that previously submitted waste discharge reports and faithfully submitted annual reports. These individuals and companies should not be required to submit new reports. This would be a positive reinforcement for compliance with the past program. If this is done, the permit fee should be waived since there will be no staff time required to review permit applications.
3. A reference should be provided to assist industries with waste loadings that prevent excess nitrogen application.
4. If a winery or food processor has previously submitted a NONA for stormwater, the previously submitted document should be acceptable. There is no need for submitting again.
5. The requirement for evaporative coolers is not needed. Wineries that use evaporative coolers are small wineries (as required to meet the size requirements of this proposed waiver). The small wineries use evaporative coolers that are sized for a typical household.

One winery's evaporative cooler was cleaned and the water collected for analyses of TDS and other cations and anions. The volume of water to be disposed of was measured. The result was that approximately 2 pounds of salt was generated. Of that there was approximately 0.5 pounds of sodium and 0.1 pound of chloride. The other salts do not pose a threat to the environment (e.g. magnesium and zinc). These are all de Minimus quantities of salts that pose no significant harm to the environment.

6. The El Dorado Winery Association would like to make a presentation to the Water Board when this matter is presented.