



#2104010.1

April 10, 2012

Ms. Lani Andam
Water Resources Control Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Room 200
Rancho Cordova, CA 95670-6114

RE: Tentative Order R5-2012-xxxx, Amending Order R5-2006-0037
For Guenoc Winery, Inc., Lake County

Dear Lani:

We appreciate the opportunity to comment on the Tentative Order recently circulated, the purpose of which is to amend the existing Guenoc Order, R5-2006-0037.

We have three technical items to bring forward:

1. Finding 9c (Page 2) indicates that bioreactor effluent limits on certain constituents are important to compel prudent operation of the unit. Finding 13 (Page 3) indicates that such effluent limits are not needed. My understanding is that 9c is directly referencing the 2008 amendment, and 13 is dealing with the current amendment. I want to verify that is the concept that the Order intends to document and there is no contradiction.
2. We would like to request clarification on the wording of Provision 1 (Page 5).
 - a. The proposed wording is: "Wastewater discharged to Pond A and DDA-2 shall not exceed...." The Provision then goes on to list constituent limits only for DDA-2. The preceding Findings indicate that there will be no limitations on the wastewater from the bioreactor to Pond A.
 - b. The wording that we believe is more accurate is: "Wastewater discharged to DDA-2 shall not exceed...." We believe that this wording is more consistent with the preceding Findings.
3. With regard to Provision 2 (Page 5), we believe that the equation for calculating the pounds of nitrogen per acre per year would be more clear if the sub-calculation for nitrogen attributed to fertilizer + pumice + sludge were in front of the sub-calculation of nitrogen from irrigation events. An alternative would be to bracket the sub-calculation for nitrogen attributed to irrigation events.

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We appreciate all of the time and effort that went into reviewing our requests, meeting with us, and preparing the resulting documents.

If you need additional information, or need amplification or clarification of any of these points, please give me a call on my cell at 707.738.4600.

Sincerely,

A handwritten signature in black ink that reads "John W. Stewart". The signature is written in a cursive, slightly slanted style.

John W. Stewart, PE
Special Projects Manager

cc: Garry McClure, Guenoc Winery, 21000 Butts Canyon Road, Middletown, CA 95461
Mike Delmanowski, EBA
Mike Long, Heritage Systems