



Paramount Farms
Pistachios & Almonds

October 24, 2013

W. Dale Harvey, RCE
Senior Water Resource Control Engineer
CA Regional Water Quality Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706-2020

**RE: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS
PARAMOUNT FARMS INTERNATIONAL, LLC & PARAMOUNT FARMING COMPANY, LLC
EL DORADO PISTACHIO PROCESSING PLANT, FRESNO COUNTY**

Dear Mr. Harvey,

Paramount Farms International, LLC (PFI) has received the notice of intent to adopt tentative Waste Discharge Requirements (WDRs) for the subject facility and proposes the following revisions to the Tentative WDRs, Mitigated Negative Declaration, Information Sheet and Initial Study.

Waste Discharge Requirements

Page 2, Statement of Fact 7

Please revise the use of the irrigation blocks as follows:

"...On an emergency basis, in case of a ~~100-year~~ storm event, or failure of the irrigation system, or when irrigation is temporarily halted for system maintenance, harvest or crop demands during the processing season, Paramount may temporarily discharge wastewater to a secondary holding area adjacent to the settling pond and consisting of nine shallow blocks with a combined capacity of about 8.5 million gallons."

The Land Application Area Specifications prohibit irrigation with wastewater within 24 hours of a storm event of measurable precipitation. During peak harvest, the additional volume of the blocks may be required for temporary storage during storm events with less precipitation than a 100-year storm. Also, Paramount Farming Company may identify reasons other than irrigation system failure when irrigation is not suitable, i.e. when additional harvest passes are required or when the application of certain pesticides requires a brief cessation of irrigation.

Page 16, Solids Disposal Specification 4

As discussed in our June 11, 2013 submittal, due to arid climate and characteristics of the dried hull material PFI is uncertain as to whether dry land farming the solids application area will be successful long-term. Therefore, PFI requests a provision to authorize a mechanical separation system and off-site transport of the hulls, subject to Board approval. If solids application is discontinued, PFI would request to return the 80-acre solids application area to a land application area on an emergency basis. Please consider the following revisions:

Solids Disposal Specification 4

Any proposed change in solids use, *separation* or disposal practices shall be reported in writing to the Executive Officer at least 90 days in advance of the change.

Land Application Area Specification 1

For the purpose of this Order, "land application areas" refers to the discharge area described in Finding 14, *and, if approved by the Executive Officer pursuant to Solids Disposal Specification 4, the former land application area described in Finding 8, for emergency use only.*

Mitigated Negative Declaration

Page 1, "Mitigation Measures"

Please revise this mitigation measure to require a comprehensive consultation with the California Department of Fish and Wildlife (DFW) and US Federal Wildlife Service (FWS), from which the level of survey will be determined:

2. Biological Resources
 - a. Contact DFW and the United States Federal Wildlife Service in advance of trenching activities to install the new irrigation line to determine whether preconstruction or protocol level surveys will be required and to ensure appropriate measures will be taken to avoid or mitigate potential impacts to special status or endangered species.

After reviewing the project delays, expense and burden to conduct protocol level surveys for a potential limited impact on special status or protected species, PFI reviewed the proposed pipeline route and determined that an alternate route for the irrigation line may be environmentally superior. PFI has contacted the US Bureau of Reclamation regarding the feasibility of securing an easement along the Coalinga Canal. If an easement for the alternate route can be obtained, final route selection will be determined after consultation with a qualified biologist, DFW and FWS.

Final resolution of this issue will likely extend beyond the 2014 hulling season. It is our understanding that the Board is considering authorizing wastewater discharge to the existing 80-acre land application area at the currently authorized discharge rates until the irrigation pipeline is constructed. PFI supports such an amendment.

Information Sheet and Initial Study

Please incorporate the comments noted above to their counterparts in the Information Sheet and Initial Study.

If you have any questions regarding these comments, please do not hesitate to call Mrs. Kathy Parker, Insight Environmental Consultants, at (661) 282-2200 or me at (661) 797-6505.

Sincerely,

A handwritten signature in cursive script that reads "Daniel Lee".

Daniel Lee
Technical Services Manager

cc: Paramount Farming Company, LLC
Insight Environmental Consultants, Inc.