

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 5/6 June 2014**

**Response to Written Comments for
Bidart Bros.
Bakersfield Potato Shed
Kern County
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 5/6 June 2014, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) for the Bidart Bros., Bakersfield Potato Shed. This document contains responses to written comments received from interested parties regarding the tentative WDRs circulated on 14 March 2014. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 5:00 pm on 15 April 2014 to receive full consideration. Comments were received from the Discharger.

Written comments from the Discharger are summarized below, followed by the responses of Central Valley Water Board staff. Based on the comments, Central Valley Water Board staff did make some changes to the tentative WDRs.

BIDART BROS., COMMENTS

On 15 April 2014, Mr. Leonard Bidart submitted written comments via email to provide clarification of the discharge, correct factual errors in the tentative WDRs, and provide his understanding of some of the monitoring and reporting requirements.

Comment No. 1: The Facility Description section of the Information Sheet refers to the source of water used for potato washing to be municipal water supply. To further clarify, there are two sources of water. One source is water from the Beardsley Canal and the other source is potable water from the Oildale Mutual Water District. At the beginning of the processing season, water from the Beardsley Canal is pumped into a 30,000 gallon storage tank and two holding ponds. Beardsley Canal water is filtered and treated with chlorine and is used primarily for washing the potatoes when they first arrive at the potato shed. Water from the Oildale Mutual Water District is used for the final rinse of the potatoes before packaging. All of the wash water is recirculated back to the holding ponds. Make-up water can be from either the Beardsley Canal or the Oildale Mutual Water District, or both.

Response: The Facility Description section of the Information Sheet has been revised to identify the two water sources and how each are used at the potato shed. In addition, the reference to municipal water has been removed from the WDRs, Monitoring and Reporting Program (MRP), and Information Sheet.

Comment No. 2: Reference to the Calloway Canal in the Facility Description of the Information Sheet should be changed to the Beardsley Canal.

Response: Reference to the Calloway Canal in the Information Sheet has been changed to the Beardsley Canal.

Comment No. 3: In Finding 3, the facility address should be 34702 7th Standard Road.

Response: The facility address in Finding 3 has been corrected.

Comment No. 4: In Finding 5, the reference to municipal water should be the Beardsley Canal.

Response: The reference to municipal water in Finding 5 has been changed to the Beardsley Canal. In addition, Finding 5 has been revised further to clarify the uses of water from the Beardsley Canal and the Oildale Mutual Water District as described by Mr. Bidart in Comment No. 1 above.

Comment No. 5: In Finding 7, the reference to replacement water should be the Beardsley Canal and/or the Oildale Mutual Water District.

Response: Finding 7 has been revised to indicate make-up water is from the Beardsley Canal and/or Oildale Mutual Water District.

Mr. Bidart also provided the following statements that reflect his understanding of the monitoring and reporting requirements.

Statement No.1: Effluent Monitoring Location EFF-001: Effluent samples shall be collected at the Etchart Reservoir after wash water from the potato shed and irrigation water have been mixed in the reservoir, but before discharge to the Land Application Area (LAA).

Response: The statement is correct. Sample location EFF-001 is after wash water from the potato shed and irrigation water have been mixed in the Etchart Reservoir but before discharge to the LAA.

Statement No. 2: Land Application Area Monitoring LAA-001: Seasonal loading calculations will follow the instructions in the footnotes at the bottom of the table in the Land Application Area section of the MRP and will only be conducted during the potato processing season. However, nitrogen loading will be reported on a monthly basis throughout the year, as required.

Response: Loading calculations shall follow the instructions in the footnotes at the bottom of the table in the Land Application Area section of the MRP. In addition to reporting the nitrogen loading on a monthly basis for the entire year, the supplemental irrigation, precipitation, and salt loading shall also be reported on a monthly basis for the entire year. Monitoring and reporting of these parameters for the entire year (even though potato processing is conducted for only a few weeks in June and July) will identify the loading to the LAA outside of the potato processing season. The instructions in the footnotes at the bottom of the table in the Land Application Area Monitoring Section of the MRP have been

revised to clarify the loading calculations and identify which parameters shall be monitored for the entire year.

Statement No. 3: Unlined Pond Monitoring PND-001 and PND-002: Unlined pond monitoring requirements of the MRP will continue during the potato processing season until the ponds are empty.

Response: The statement is correct. Samples shall be collected from locations PND-001 and PND-002 at the frequencies identified in the Unlined Pond Monitoring section of the MRP, but only during the potato processing season until the ponds are empty. A composite sample of residuals solids in the ponds shall be collected at the end of the potato processing season when the ponds have sufficiently dried to allow sample collection.

Statement No. 4: Source Water Monitoring SPL-001: Source water samples will be collected at the beginning and end of the potato processing season.

Response: The statement is correct. Two samples of each source shall be collected, one at the beginning and one at the end of the potato processing season. Since there are two sources of water for the potato shed (Beardsley Canal and Oildale Mutual Water Company); the flow-weighted average concentrations for the specified constituent/parameter shall be reported. The Source Water Monitoring Section of the MRP has been revised to indicate that publically available data (such as a Drinking Water Consumer Confidence Report) may be used in lieu of collecting and analyzing samples of each water source.