

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 30-31 July 2015**

**Response to Written Comments for  
Giumarra Vineyards Corporation and  
Giumarra and Associates Beverage Company, LLC  
Edison Grape Processing Facility  
Tentative Waste Discharge Requirements**

---

At a public hearing scheduled for 30 and 31 July 2015, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) for Giumarra Vineyards Corporation and Giumarra and Associates Beverage Company, LLC, Edison Grape Processing Facility (Edison Facility). This document contains responses to written comments received from interested parties regarding the tentative WDRs (TWDRs) initially circulated on 13 May 2015. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 15 June 2015 to receive full consideration. Giumarra Vineyards Corporation submitted written comments.

Written comments from the above interested party are summarized below, followed by the response of the Central Valley Water Board staff. Central Valley Water Board staff did make some changes to the TWDRs based on comments and to improve clarity and fix typographical errors.

---

**GIUMARRA VINEYARDS CORPORATION (GIUMARRA) COMMENTS**

---

On 15 June 2015, Giumarra submitted comments with an attached letter from NV5 signed and stamped by Patrick F. Dunn (Certified Hydrogeologist No. 900).

**GIUMARRA COMMENT NO. 1:** Giumarra comments that restricting the monthly average flow limit in the TWDRs from the initially requested flow limit of 192,000 gallons per day (gpd) to 78,900 gpd will inhibit Giumarra from operating the Edison Facility. Giumarra states that with the completion of a Wastewater and Nutrient Management Plan as required by Provision G.13 of the TWDRs, Giumarra will be able to fully assess the implementation of best practices, loading rates, and determine compliance with the TWDRs. If findings in the Wastewater and Nutrient Management Plan indicate that Giumarra has not been in compliance with Effluent and Mass Loading Limitation B.2, Giumarra proposes to implement various methods such as chemical and/or pond aeration treatment, expansion of the land application areas (LAA), and/or reducing wastewater flows to 78,900 gpd to come into compliance with the TWDRs. Giumarra request that the TWDRs allow for a monthly average flow limit of 192,000 gpd based on a calculation that demonstrates that, based on a 3 day application cycle, Giumarra only needs an additional 5 acres of land to meet the 100 lbs/acre/day cycle average biochemical oxygen demand (BOD) loading rate and that Giumarra has an additional 46 acres of farmland available to include into its current LAA.

**RESPONSE:** Current management practices at the 80-acre LAA include growing native grasses and plowing them twice a year. There is no reuse or crop uptake. The LAA is flood irrigated with process wastewater using furrows up to 800 feet in length. Soils at the

LAA generally have high percolation rates (24 feet/day). There are not consistent rest periods between applications of wastewater. Giumarra has had historical issues with ponding and odor complaints at the LAA due to BOD overloading. The Edison Facility is an area of good quality groundwater and meets the water quality objectives for domestic and municipal supply. The high organic strength of the waste combined with uneven loading, lack of nutrient uptake, and high percolation rates indicate that the historical discharges threaten to cause impermissible degradation/pollution of groundwater. Giumarra has not provided the Central Valley Water Board with appropriate technical information that ensures BOD loading to the 80-acre LAA will not threaten groundwater quality.

The TWDRs authorizes a discharge flow of 192,000 gpd and simultaneously requires Giumarra to implement a Wastewater and Nutrient Management Plan (Provision G.13) demonstrating the BOD loading to the 80-acre LAA will not exceed 100 lbs/acre/day as a cycle average when wastewater is applied via flood irrigation or 150 lbs/acre/day as a cycle average when wastewater is applied via sprinkler irrigation.

**GIUMARRA COMMENT NO. 2:** The main comment by Giumarra has to do with parts of the TWDRs (Provision G.11) that discuss/require the installation of a groundwater monitoring well network. Giumarra requests that language in Provision G.11 be modified to allow the submittal of: a Salinity Management Plan, a Wastewater and Nutrient Management Plan, and a *Groundwater Beneficial Use Study and Existing Conditions Irrigation/Domestic Well Assessment Report* prior to the installation of a groundwater monitoring well network. In addition, Giumarra requests for the time schedule in Provision G.11 to be extended up to three years to allow sufficient time to complete the aforementioned reports. Giumarra states the *Groundwater Beneficial Use Study and Existing Conditions Irrigation/Domestic Well Assessment* will evaluate local underlying hydrogeology and groundwater quality from select irrigation and domestic wells surrounding the Edison Facility and LAA. Giumarra states that the Wastewater and Nutrient Management Plan will aid in determining if additional acreage is needed, therefore, a phased approach Work Plan for the installation of the groundwater monitoring well network is necessary in order to determine the location of the monitoring wells.

**RESPONSE:** Giumarra has operated at the Edison Facility since the 1960's. Revised Monitoring and Reporting Program adopted on 15 August 1980, required Giumarra to install a groundwater monitoring well network. A groundwater monitoring well network has not been installed to date.

As discussed in the response to comment 1, degradation/pollution of groundwater is expected at the LAA due to the long term, uneven disposal of high strength organic wastewater via flood irrigation on highly permeable soils. The Edison Facility does not have groundwater monitoring wells to evaluate impacts to groundwater resulting from the historical discharge to the 80-acre LAA.

The TWDRs have been modified to require Giumarra to install a groundwater monitoring well network at the 80-acre LAA to be completed within a three year time schedule.

**GIUMARRA COMMENT NO. 3:** Giumarra requests that the effluent monitoring frequency be reduced from weekly to every two weeks. Additionally, Giumarra comments that after one year of stable data it may request another reduction in monitoring frequency from every two weeks to monthly or every other month, as approved by the Executive Officer.

**RESPONSE:** The change has been made.