ARO PISTACHIOS

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April 21, 2016

Scott Hatton, RCE
Senior Resource Control Engineer
CA Regional Water Quality Control Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706-2020

RE: Tentative Waste Discharge Requirements for ARO Pistachios, Inc. and Mehdi Orandi, Terra Bella Processing Facility, Tulare County

Dear Mr. Hatton:

We appreciate the opportunity to review and comment on the above referenced tentative Waste Discharge Requirements (WDR). Although we submitted comments for your consideration on the administrative draft WDR on March 14, 2016, we would like to reiterate those comments at this time with one exception related to the groundwater monitoring frequency. Our previous and revised comments are as follows:

1. Finding #45 requires ARO Pistachios to install a groundwater monitoring network and monitor groundwater below the Facility and LAAs on a quarterly basis.
   We request that the installation of a groundwater monitoring network not be required at this time. Instead, we request to be allowed to use existing water supply wells (irrigation) at and around the facility and LAAs for groundwater monitoring. There are currently two irrigation wells in Ranch 2 (downgradient) and one irrigation well near the southwest corner of Ranch 1 (downgradient). Any of these wells could be used for monitoring groundwater (see attached map). Additionally, we request that the groundwater monitoring frequency be reduced from quarterly to annually. Due to the depth of groundwater (approximately 150' below ground surface), minimal discharge volume, short duration of seasonal wastewater application, zero to minimal precipitation during the harvest season and the assurance that wastewater will be applied at agronomic rates in order to protect our primary asset (pistachio orchards), we believe annual monitoring using existing wells would be adequate to monitor potential groundwater degradation. Furthermore, because the newly installed dry hulling plant will primarily be used, a lower volume of better quality

wastewater will be generated. The typical industry water usage is 6 gpm for lubrication, 15 gpm for loose huller remover and 70 gpm for wet peeling. Since our plant uses dry peelers (Magnusson peeler), our water usage will only be 21 gpm per peeler. We currently have four of this type of peelers. A review of laboratory data of effluent samples analyzed during the 2015 hulling season indicated a reduction in the concentrations of most of the constituents/parameters analyzed such as BOD, TDS and EC. This groundwater monitoring request would be comparable to the groundwater monitoring requirement in WDR R5-0009-0050 for a similar pistachio processing plant located approximately a mile south of the facility.

2. Discharge Prohibition B.2. specified an average monthly limit of the effluent's electrical conductivity (EC) to 1,000 µmhos/cm in compliance with Task d of Provision G.12. Task d requires a technical report that determines if the effluent limitation of 1,000 µmhos/cm is applicable based on groundwater quality. We request that no limit be set based on the Basin Plan exception for food processing industries that discharge to land and exhibit a disproportionate increase in the EC due to unavoidable concentrations or organic dissolved solids from the raw product. The analytical data during the 2015 hulling season indicated approximately 64% of the TDS is a result of the organic compounds in the water. The EC data average of the effluent during the 2015 hulling season is 1,872 µmhos/cm. Therefore, the EC of the effluent is dependent on the source water and the hulling process and may not be reduced without further water treatment. Potential impacts to groundwater should be minimized by the implementation of a Wastewater Management Plan and Salinity Control Plan similar to other pistachio processing facilities such as those regulated under WDR R5-2009-0050, R5-2013-0151 and R5-2015-0082.

3. On the tentative WDR, the facility map (Attachment A) still has the old Assessor Parcel Number (APN) for Ranch 2. Please update to reflect the current APNs.

Thank you for your consideration of our requests. If you have any questions, please contact me at (559)-535-1500 or Kathy Parker or Dolores Gough with Insight Environmental Consultants at 661-282-2200.

Sincerely,

Adam Orandi

Adam Orandi, CEO
ARO Pistachios, Inc.
attachment

Water Data Library

Use the map below to locate monitoring stations. You can find an area of interest if you zoom and pan the map. Quickly find an area searching for named features on a map such as the name of a city, park, landmark, lake, water feature, or zip code within California. Once at the area of interest, select the desired Site Type and click the "Refresh Map" button to show monitoring stations in the area. Additional searches by data type are possible by clicking the links on the left. For help on these and other ways to find your data click here.

WDL STATION MAP

Location Search

To find monitoring stations for a specific area, enter the placename or zip code into the text box below

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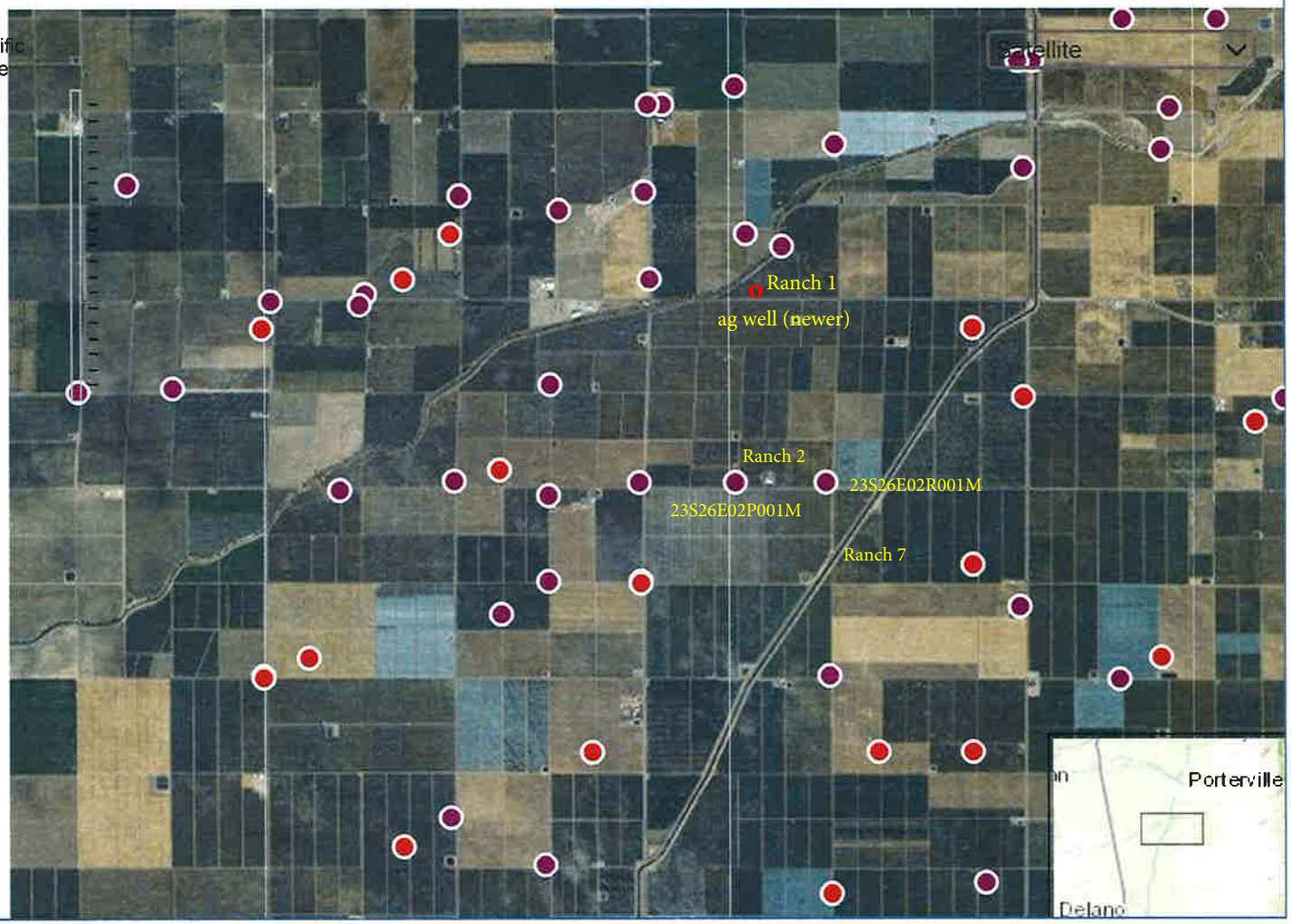
Site Type

Select the desired site type using the checkboxes

- [x] Groundwater Level
- [x] Water Quality
  - [x] Include Historic Data
- [ ] Continuous Data

= Multiple Stations at one Location

= Cluster, showing number of stations

Cursor Coordinates (WGS84)

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