

## Points to address to RWQCB

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**From:** "Keith M. Backman" <kbackman@dellavallelab.com>  
**To:** <AgOrder@waterboards.ca.gov>  
**Date:** 12/22/2010 11:13 AM  
**Subject:** Points to address to RWQCB  
**Attachments:** Points to address to RWQCB.doc

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See attached

Points to address to RWQCB #3 regarding draft order R3-2011-0006

From the standpoint of a CCA involved with the Central Valley Dairy Order

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Regarding INMP - regarding nitrogen loading

**Well & Pump Volume**

Nitrogen application needs to be measured and projected in areas with significant well water nitrogen. This cannot be done without a water meter or at least a professional pump test indicating gallons per minute.

This needs to be stipulated in the order. They should have this information in order to make use of the water nitrate tests. All tiers?

**Soil Sample depth and frequency** should be specified for any tier that needs to fertilize accurately. (page 57)

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Nitrate  $\leq$  10 mg/L NO<sub>3</sub> (N)

Not good nomenclature. Does the 10 refer to nitrate or nitrate-N?  
[drinking water MCL is 10 NO<sub>3</sub>-N or 45 NO<sub>3</sub>]

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Will the order stipulate what happens when the grower shifts crops from year to year or has a small percentage of risky crops?

Fields are rented for 1 season?

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