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Comments on Waste Discharge Requirements
Order No R5-2007-XXXX
For SK Foods

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RWQCB-CVR
FRESNO, CALIF.

September 9, 2007

Mr. Douglas K. Patteson
Senior Engineer
REC No. 55985
California Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

Dear Mr. Patteson:

The following comments are addressed towards the tentative Order No. R5-2007-XXXX for SK Foods. I previously commented on this issue with my letter dated June 15, 2007, a copy of which is attached. This letter will address specific areas of the tentative order, and demonstrate some of the concerns addressed in my prior letter.

Comments on Order No. R5-2007-XXXX

Paragraph 2. In my previous letter I showed the location of my home in relation to the discharge area, which is the basis for my concern, primarily surrounding the odor factor.

Paragraph 5. The referenced Attachment B, a copy is attached, shows "Lemoore Canal Water". In this area "Lemoore Canal" is a shortened version of the full name of the Lemoore Canal and Irrigation Company. I can assure you that Lemoore Canal water can not be used on the Land Application Site. I have confirmed this with the manager to make sure there has been no change in policy. In Paragraphs 10 and 19, reference is made that the waste water is blended with irrigation water to help with "nuisance conditions". As to the operations that have occurred this summer, I have not seen any blending of irrigation water with the discharge water during my limited visits to the discharge site this summer, as called out in Discharge Specifications C.4., and stated in paragraph 19.

Paragraph 8. The Food process line discharge of about 400,000 gallons per day is a very small flow that will be difficult to deal with on the scale of the proposed project, even with the minimum dilution specified in Discharge Specifications C. 4. It should be required from the City of Lemoore that SK can continue to discharge this water to the City of Lemoore's wastewater treatment plant when conditions warrant, such as heavy

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rains or lack of a suitable crop or dry land to utilize the water. The City needs to be held somewhat accountable for the disposal of process waters of the industrial complex as the City continues to allow expansion of the existing facilities and seek additional industrial growth.

Paragraph 10. There is reference to a holding pond and aeration of the waste water prior to the transfer to the Use Area. I don't see any reference as to what aeration requirements are required. Is it implied that the aeration level is what is necessary to meet application requirements in the Use Area?

This paragraph also references that screenings are collected and utilized as cattle feed. The requirement here should further state that any major spills of solids within the plant have to be collected and hauled offsite for feed or otherwise disposed of as required in Solids Specifications E.2. This will help the BOD loading of the waste water. It is easy to just flush this material down the drain.

Paragraph 12. This paragraph as written is not true. The current line installed in the spring of 2007 does not discharge into a ditch that can "supply the entire 2,600-acre Use Area." The pipe line as currently configured can only supply water to the east-half of the Use Area utilizing gravity. There will have to be a substantial extension of this line to the west and south due to the topography of the lands to continue to utilize the current gravity system of transport within the Use Area. Utilizing the current open channel system beyond what is utilized now, will have other operational considerations, if this water is to remain on the Use Area. Obviously, there may be other plans to distribute the wastewater within the Use Area that I am not aware of.

Paragraph 15. This paragraph anticipates that the water utilization rate would be 4-inches in a 10 day period, or 4 tenths of an inch per day. There are few, if any crops that can utilize this much water from an evapotranspiration (ET) standpoint. This is especially true during the latter half of August through the end of the season in October. This land already has a relatively high water table that is called very salty by this report. Given the salt loads of the water applied under this project, the continued beneficial use of this land will require very careful salt and water table management in the future if it is to continue to grow crops.

Paragraph 16. I would have to question the BOD loading calculations as presented. See Attachment 1, with my observations as to the present odor issues.

Paragraph 17. I question whether the crops listed are complete given the irrigation systems being installed in the Use Area.

Paragraph 18. See comments on paragraph 12.

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Paragraph 19. See comments in paragraph 5.

Paragraph 23. These soils are not very well drained. This accounts for the high water tables, and made them eligible for the Westlands Water District land retirement program. This doesn't mean they can't be farmed, but the water applications will have to be managed carefully to keep the root zone usable. See paragraphs 29-32 of this report.

Paragraph 43. This seems to indicate that the application of water to the Use Area and other disposal criteria for the 2007 year is not entirely subject to this order. Where that is the case, my comments above would then apply to the future as appropriate.

Paragraph 58. I appreciate the opportunity to comment on this program. My comments while broad ranging, are concerned primarily around the odor issue and to keep it mitigated as much as possible. While it may not be the primary focus of the Board to deal with an air issue, I am pleased to see Discharge Specification C.2.

The definition of "Objectionable" can be difficult. Please see the attached summary of odors and their levels that I have included as Attachment 1.

The true solution to this odor issue would be to require the treatment of this water before discharge. Since that does not seem to be the direction of the Board at this time, I would submit that the next best solution, is at the very least to be the complete application of this order, even though I don't think it will keep the odors confined to the Use Area, especially as the discharge increases in the future. From my standpoint, and the other houses in my immediate vicinity, I would hope that the board would require the disposal of this water to be over all of the property as necessary, and especially to the western portion as a priority, to move the odor source as far away as possible. I would also hope the Board would devote the necessary resources to monitor the compliance of this order in the future.

I would refer you back to the closing paragraph in my letter of June 15, 2007. The basic implications and concerns still stand. The events so far this summer as to the odors, are testing the limits. Again, thank you for the opportunity to comment.

Yours truly,



John Howe

Attachment 1
John Howe Comments
September 9, 2007

Time frames of odor problems with SK Foods water discharge

The following listed observations are not all inclusive, but a demonstration that the odors are not contained within the land application site. This also contains some other observations made through September 9, 2007.

The word "Objectionable" has different meanings to almost everyone. It can take into account the smell of the odor itself, the time of day that it is present, and the duration of the event. The following are the general descriptions of terms as I have used them:

Light: Perceptible in the short run, but may just be ignored after becoming acclimated

Moderate: Definitely present. No guessing. May become non-objectionable over time for some people. Sensitive people will attempt to move away from smell.

Strong: Cannot be ignored. Will force recreational use of yard to cease and move indoors for most people. Don't want to let into the house.

Very Strong: Very objectionable, anyone would seek shelter from it immediately if able. Definitely take extra precautions to keep from entering a house.

At first I tried to quantify the duration. That became very time consuming. The duration of the events described varied from minutes to hours. During the event in August, and early September, it was very pronounced over several days.

July 15 in the evening from 18:00 to 20:00 very strong

July 18 in the morning 08:00 to 09:30 moderate

July 22 in the evening from 19:00 to 20:00 very strong, infiltrated the house

July 23 in the evening from 18:30 to 19:00 strong, and was stronger further SE on 22nd avenue.

July 26 in the evening 17:00 moderate

July 28 in the evening 19:00 moderate

July 29 in the evening 17:00 moderate

Attachment 1
John Howe Comments
September 9, 2007

August 3 Pictures of operations, no crop. Field being irrigated not level enough for water control. No apparent dilution with clean water of the discharge water.

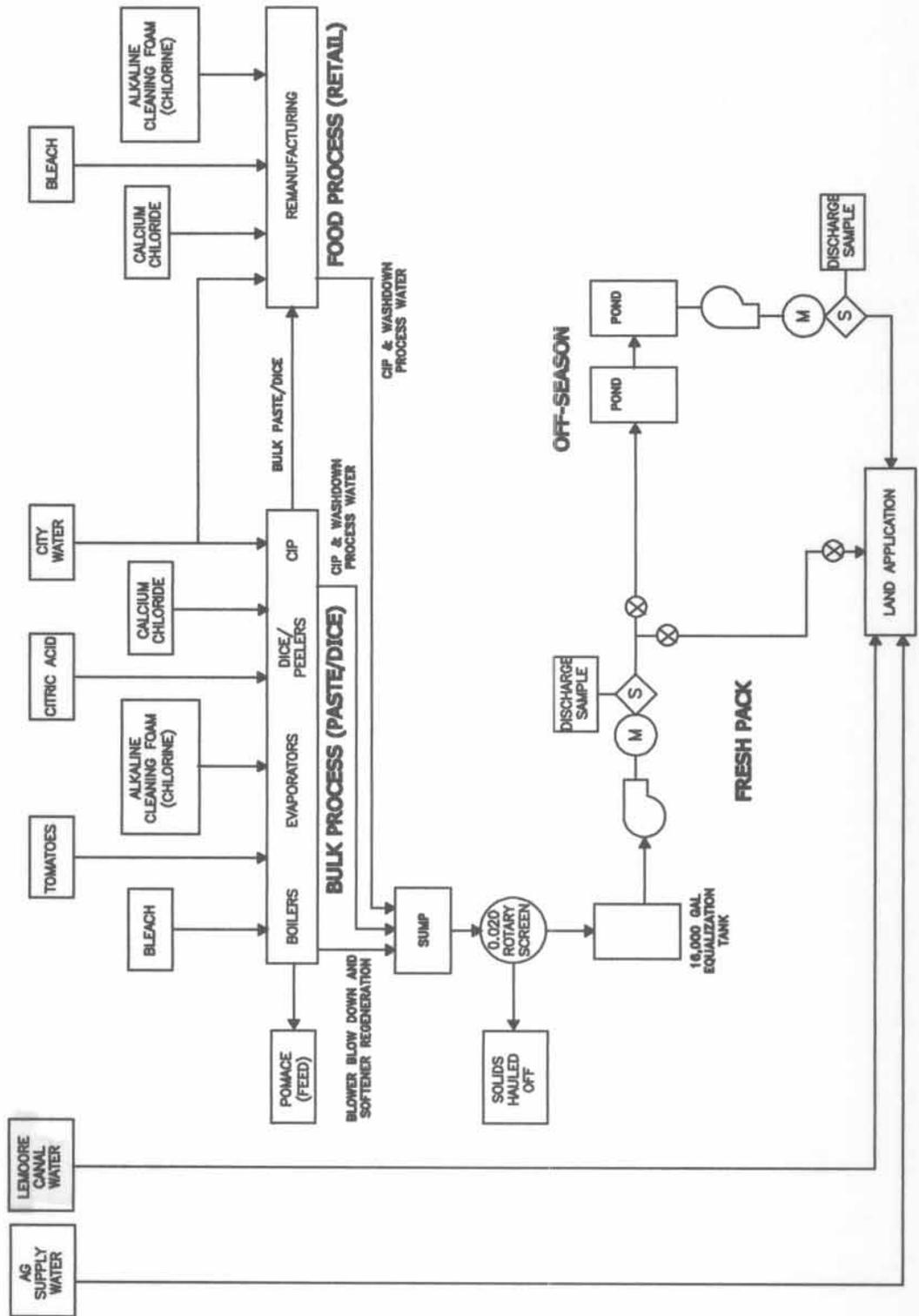
August 9 in the evening 22:00 moderate
August 10 in the morning 06:00 moderate
August 19 evening moderate
August 20 morning and evening moderate
August 21 morning and evening moderate
August 22 morning moderate, evening strong
August 23 morning strong, evening light
August 24 morning moderate

August 23, observed planter in field. Too late to plant any crop that is going to utilize any real water during this application season.

September 1 Evening - strong.
September 2 Evening - very strong.
September 3 Evening - strong.
September 5 morning - strong.
September 7 morning - light
September 7, 2007: Supply canal full of water. No apparent dilution with clean water of the discharge water being applied. There is no agronomic crop in the application area. Only about one-half the area was ever planted, and the planted area crop is marginal.

September 8 Evening - very strong. Had house open and had to close. Odor infiltrated

There are times in the summer months that the evenings cool to the point that opening the house at night is a viable option to keeping it closed and turning on the air-conditioning to keep cool. When this is not possible due to the odors, this is an economic impact.



WASTEWATER TREATMENT PLANT FLOW DIAGRAM
 ORDER NO. R5 -
 WASTE DISCHARGE REQUIREMENTS
 FOR
 S K FOODS
 LEMOORE FACILITY
 KINGS COUNTY

ATTACHMENT B

NOT TO SCALE