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February 11, 2010



Mr. Robin Merod
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

1017-138229

Subject: Campbell Soup Supply Company Dixon- Comments on Tentative WDRs

Dear Mr. Merod:

On behalf of Campbell Soup Supply Company LLC (CSC), Brown and Caldwell is submitting the following comments to the Tentative Waste Discharge Requirements issued in the notice dated January 14, 2010.

1. **Item 6, page 1.** Please insert the word "maximum" on line 4 between the words discharge and flow rate. The Report of Waste Discharge requests an average monthly flow of 4.5 million gallons per day (mgd) but not a limit on maximum flow rate.
2. **Item 10, page 3.** The item should contain a third sentence stating that if the County permit is obtained and the County's requirements are fulfilled, then the requirements of this Order for the Domestic Wastewater Pond Closure Workplan do not apply.
3. **Item 21, page 5, second paragraph, sixth sentence.** Please revise this sentence to require a significant reduction in salinity from controllable sources, including the ion exchange regeneration. For example, Campbell Soup must implement the results of a Salinity Reduction plan and reduce the use of salt by 100 ton/yr.
4. **Item 34, page 9.** Please change the flow rate in line 2 to 5.0 MGD rather than 4.0 MGD. The revised water balance sent to you in December, following the December 17th 2009 meeting, shows a flow rate in August of 5 MGD and an annual flow of 490 MG. Please change the words at the end of the third sentence to say "wet year", rather than "storm event".
5. **Item 72, page 18, line 8.** Please change the value of 440 MG to 490 MG to reflect the revised water balance.
6. **Item 77d, page 21, line 3.** Please revise the value (405 MG) to (420 MG) and the value (35 MG) to (70 MG) to reflect the revised water balance.
7. **Item A.6, page 24.** Please revise the wording to require a reduction of 100 tons/yr of salinity to be accomplished by this date.

8. **Item B.2, page 24.** Please revise the figure of 440 MG to 490 MG, to be consistent with the finding in Item 34, 72, and 77.
9. **Item C, page 25.** Please add a footnote to Item C indicating that these specifications will no longer apply after the Discharger has complied with Provision I.f.

For the proposed Monitoring and Reporting Plan (MRP) we have the following comments:

1. **Tailwater Pond Monitoring, page 3.** Please add the words (“tailwater from process water irrigation”) into the first line after the word water.
2. **Tailwater Pond Monitoring, page 3.** Please delete DO, EC and FDS from the constituents to be monitored. The EC and FDS of the process water have already been monitored. The Tailwater pond is not a treatment unit, it is only intended to allow the temporary capture and reapplication of any applied water that did not infiltrate into the treatment fields. Therefore it is unnecessary to monitor for DO under these conditions.
3. **Land Application Area Monitoring, page 3, table.** Please delete daily precipitation monitoring. Precipitation records can be downloaded monthly for the monthly report.
4. **Solids Monitoring, page 5.** Please change the reporting to annually rather than monthly. Solids removal is a once per year operation.

Thank you for your attention to these comments. If you have any questions, please call me at (530) 204-5204.

BROWN AND CALDWELL

Ronald W. Crites

Ronald W. Crites, PE
Natural Systems Service Leader



RC:iu

cc/enc: Tim Gruenwald, Campbell Soup—Sacramento, CA
Pete Imhoff, Campbell Soup—Dixon, CA
Robert Zimmerman, Campbell Soup, NJ
Jennifer Chen, Brown and Caldwell—Davis, CA