



April 19, 2011

Lani L. Andam, Water Resource Control Engineer
Waste Discharge to Land Unit
California Regional Water Quality Control Board,
Central Valley Region
Sacramento Main Office
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

Re: Tentative Waste Discharge Requirements for Bogle Vineyards, Inc., Bogle Delta Winery, Yolo County
Summit Project No. 2009055

Dear Ms. Andam:

We have reviewed the *Tentative Waste Discharge Requirements for Bogle Vineyards, Inc., Bogle Delta Winery, Yolo County* dated March 23, 2011. Based on our review and discussions with Bogle Vineyards (the owner) we have the following comments and recommendations concerning the tentative Waste Discharge Requirements:

Section 10.a: *A tanker truck will be used to transfer the additional process wastewater from the ORV facility into the treatment system via a dump station located at the receiving area of the winery.*

Comments:

1. The owner has made a business decision to maintain limited operations at the existing Bogle Winery facility located at 37783 County Road 144, Clarksburg, Yolo County, California. They would like to include the transfer of process wastewater from the existing facility to the dump station in this Order. Additional process wastewater from the existing facility is expected to be minimal and well within the design capacity of the new Bogle Delta Winery process wastewater treatment system.
2. The dump station has been relocated from the receiving area to the access road just north of the Barrel Building.

Section 13.j: *A conveyor transfers the solids generated from the crushing area directly into facility dump trucks. These trucks spread the solids over the LAA. Solids collection and transfer will be a continuous process; therefore the Discharger does not anticipate storage of solid wastes.*

Comment:

1. In addition to spreading the solids over the LAA, the owner may contract with a private company to have the solids hauled to an off-site location for disposal and/or composting. Solids transfer would be continuous with no on-site solids waste storage anticipated.

Section 30: *Prior to the Federal Emergency Management Agency (FEMA) re-designating the flood level zones...the winery was within a Flood Zone B...Changes to the FEMA flood maps took effect on June 2010...designating the location of the winery as a Flood Zone A, areas with a one percent chance of*

flooding.

Comment:

1. According to the new June 2010 FEMA map for the site, base flood elevations have not been established for areas designated as Zone A.

Section G.1.d: *By 3 October 2011, the Discharger shall submit and implement a Salinity Evaluation and Salt Minimization Plan.*

Comment:

1. We recommend that the facility be fully operational for at least one year, which would provide the facility with sufficient time to establish a baseline of existing practices, therefore helping quantify salt usage and identify opportunities for salt usage reduction. Full production at the winery is planned to begin in October 2011. To provide for at least one year of baseline operations, groundwater monitoring and effluent TDS data, we recommend that the Board re-evaluate the need for this plan in November 2012.

Please also note that the owner is conscious of the impacts of salinity to groundwater in the region and has proactively incorporated methods for reducing salt contribution into the design of the new facility. If, after the first year of full operation, the TDS concentration in the process waste pond effluent can be shown to have a negligible effect on the baseline groundwater quality, it is our opinion that a Salinity Evaluation and Salt Minimization Plan not be required.

Stormwater Pond Monitoring: Please refer to the Stormwater Pond Monitoring Table

Comment:

1. The stormwater pond is designed to allow water from the irrigation canals to move freely into and out of the pond during the winter season. Due to this situation, a positive water quality sample for a constituent may not be representative of a process wastewater discharge into the stormwater pond. This is especially true for electrical conductivity and concentrations of nitrogen and dissolved solids, all of which have been shown to increase dramatically in the canal water during the winter months.

In our opinion only BOD testing is necessary for determining if process wastewater has been discharged into the stormwater pond. We suggest removing the sampling requirement for all constituents other than BOD.

Please also note that the facility has installed switches on all diversion valves to indicate when the valves are open to the stormwater pond. This provides facility operators with a constant reminder when the valves are open. The facility has also elected to install a series of high water alarms in the diversion boxes to provide warnings before water rises to the level of the overflow to stormwater. In our opinion these measures provide a high level of protection against unknown discharges of process wastewater to the stormwater pond. Due to these measures we believe the proposed sampling frequencies are unnecessary and suggest requiring sampling only after a high water alarm has been sounded or if there is a precipitation event while the valves are open.

Please also note that the stormwater pond will be monitored under WQO No. 97-03-DWQ, *Discharges of Stormwater Associated with Industrial Activities* which typically includes sampling requirements for many of the constituents listed.

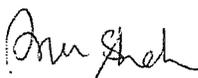
Land Application Area Monitoring: Please refer to the Land Application Area (LAA) Monitoring Table

Comments:

1. A direct method for measuring the flow of supplemental irrigation water is not planned for the facility. However, the irrigation demand per week (typically measured in acre-feet) is known on a weekly basis. As an alternative to direct flow measurement, we propose calculating the amount of supplemental water as the difference of the irrigation demand and the measured flow of reclaimed process wastewater.
2. Due to the large size of the LAA it will be difficult for the farming employees to take daily flow readings from PW Pond 3. The owner would like to request reducing the flow readings to a weekly basis. We are supportive of this request given the size of the LAA and the low risk of overloading the soil on a daily basis.

We appreciate the opportunity to provide comments on the tentative WDRs. Please call if you would like any additional information or have any questions related to this matter.

Sincerely,



Anu Shah, P.E.
DIVISION MANAGER

cc: Warren Bogle – Bogle Delta Winery
Ryan Bogle – Bogle Delta Winery
Ken Lazzaroni – Bogle Delta Winery