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Mr. Robert A. Crandall, Assistant Executive Officer  
c/o Mr. Ron Falkowski  
California Regional Water Quality Control Board  
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**TENTATIVE WASTE DISCHARGE REQUIREMENTS ORDER FOR SUNSWEET DRYERS, INC., PRUNE DEHYDRATOR, GLENN COUNTY**

This letter transmits my comments on the subject Tentative Order. I am a resident of Fresno County and a California registered civil engineer with expertise in evaluating the effects to soil and groundwater from discharges of food processing and winery wastewater to land for treatment and disposal. I gained this expertise during the 11 years that I worked as a Senior Water Resources Control Engineer in the Fresno Office of the Central Valley Water Board.

Finding 10 presents values for hydraulic loading to the 26-acre land application area of wastewater at current and future capacity and of irrigation water. The cited value of 4 inches per year for current wastewater loading is incorrect and should be 2 inches. The cited value of 30 inches per year for irrigation water is incorrect and should be 32 inches. **Recommendation 1: Revise Finding 10 to present correct values for hydraulic loading of wastewater at current capacity and for irrigation water.**

Most waste discharge requirements orders for organic-rich wastewater discharges include one or more findings characterizing discharge quality for biochemical oxygen demand (BOD) and nitrogen compounds (i.e., total Kjeldahl nitrogen, ammonia, nitrate). Finding 17 presents values characterizing discharge quality for a variety of salinity constituents, including nitrate, which is characteristically low considering the discharge is untreated food-processing wastewater. Finding 14 presents a value for BOD loading of 35 pounds per acre per day based on a hydraulic loading of 1,923 gallons per acre per day. Finding 15 presents values for total annual flows and nitrogen loadings at current and future capacities. Discharge BOD and total nitrogen can be ‘back calculated’ based on the information provided in these two findings, however, the reviewing public should not be required to back calculate essential data characterizing the discharge in order to assess the accuracy of cited loading rates. The cited values for annual nitrogen loading, in particular, correspond to a discharge total nitrogen content of about 6 mg/L, which seems too low for a food processing wastewater discharge. To remove all uncertainty regarding discharge BOD and total nitrogen, the Tentative Order should cite values characterizing discharge BOD and total nitrogen. **Recommendation 2: Include a finding that characterizes discharge BOD and total nitrogen at current and future capacity.**

Finding 38 states, “State Water Board Resolution No. 77-1, Policy with Respect to Water Recycling in California, encourages recycling projects that replace or supplement the use of fresh water, and the Water Recycling Law (California Water Code Section 13500-13259.4) declares that utilization of recycled water is of primary interest to the people of the State in meeting future water needs.” California Water Code Section 13050(n) defines recycled water as “water which,

**as a result of treatment of waste**, is suitable for a direct beneficial use or a controlled use that would not otherwise occur and is therefor considered a valuable resource” (emphasis added). Because the Discharger is not proposing to treat the wastewater to reduce its BOD content, the Facility’s high-strength processing wastewater is not recycled water and the proposed discharge operation is not a water recycling operation, but a wastewater disposal operation.

**Recommendation 3.** Delete finding 38.

Waste discharge requirements orders for land disposal typically require dischargers to design, construct, operate, and maintain all waste conveyance, treatment, storage, and disposal units to prevent inundation or washout due to floods with a 100-year return frequency. The Tentative Order is no exception (Discharge Specification B.5). These orders also typically contain a finding disclosing whether or not the Discharger’s waste treatment facility and disposal area are within a 100-year flood plain. The Tentative Order does not. This makes it difficult for the reviewing public to assess whether the Discharger can comply with Discharge Specification B.5 immediately upon Order adoption. **Recommendation 4: Include a finding that identifies the Discharger’s facility and disposal area relative to the 100-year flood plain. If the Discharger is unable to immediately comply with Discharge Specification B.5, include a provision establishing a time schedule for compliance.**

I offer these four recommendations in the hope that staff will revise the Tentative Order accordingly, or provide justification why staff believes the recommended changes are not warranted.



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