



December 20, 2012

W. Dale Harvey, RCE
Senior Water Resource Control Engineer
CA Regional Water Quality Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706-2020

**RE: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS
HORIZON NUT, LLC AND GLOBAL AG PROPERTIES USA, LLC
LOST HILLS PISTACHIO PROCESSING PLANT, KERN COUNTY**

Dear Mr. Harvey,

Horizon Nut, LLC has received the notice of intent to adopt tentative Waste Discharge Requirements (WDRs) for the subject facility and proposes the following revisions to the Tentative WDRs, Monitoring and Reporting Program and Information Sheet.

Waste Discharge Requirements:

Page 2, Statement of Fact 5

Please change the source water disinfection description to "The plant disinfects the source water with chlorine gas or sodium hypochlorite..."

Page 2, Statement of Fact 7

Please change the description of the wastewater ponds and irrigation reservoirs to "...Pond 2 discharges to any of four irrigation reservoirs. The remaining four wastewater ponds are for emergency storage." The four irrigation reservoirs are identified on the attached map.

Page 2, Statement of Fact 9

Please change the description of solid waste handling practices to "Solids removed during the pre-cleaning process are moved with the rest of the debris from the pistachio orchards and composted or shipped off-site as a commodity. The pistachio hulls are removed from the wastewater ponds annually or biannually and evenly applied and incorporated into up to 400 acres of open land."

Page 2, Statement of Fact 10

Please change the description of wastewater distribution practices to "Wastewater is pumped from Pond 2 to any of four irrigation reservoirs near the wastewater application area. Based on crop requirements and agricultural suitability, wastewater is mixed with irrigation water from the Berrenda Mesa Canal or applied undiluted. The water is pumped through sand filters before being applied to 1,460 acres of pistachios via micro-irrigation."

Page 15, "D. Wastewater Application Area Specifications"

Please change specification 4 from "The BOD loading to the wastewater application area calculated as a cycle average as determined by the method described in the attached Monitoring and Reporting Program, shall not exceed 300 pounds per acre per day."

This change is requested because although the average daily BOD loading rate should be below the USEPA recommended limitation rate of 100 lbs/acre/day, variations may occur with seasonal sources. USEPA guidance (publication 625/3-77-00 7) indicates that BOD loading rates in excess of 100 lbs/acre/day is possible if the site is irrigated for only a few weeks each year and is well maintained. This publication is supported by the Wine Institute Study for Land Disposal of Wine Stillage Waste report, which recommended a daily maximum of 600 lbs BOD/acre/day.

Page 15, "E. Solids Disposal Specifications"

Please refer to the comments above regarding Page 2, Statement of Fact 9.

Monitoring and Reporting Program:

Page 2, "Source Water Monitoring"

Please change the requirement to "If more than one source supplies source water, the Discharger shall calculate..."

Page 4, "Wastewater Pond Monitoring"

Please add an exception to monitoring dissolved oxygen in Pond 1 when pistachio hulls have formed a surface barrier preventing safe and representative sampling.

Information Sheet:

Please incorporate the comments noted above and revise *Attachment A - Site Location Map* to reflect the solids application areas identified on the Assessors Parcel Maps attached to our June 15, 2012 submittal.

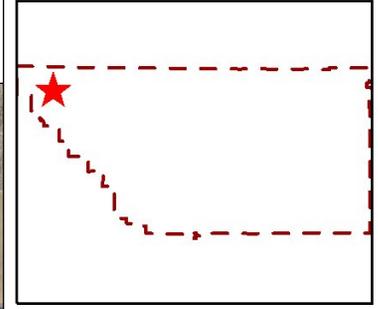
If you have any questions regarding these comments, please do not hesitate to call Mrs. Kathy Parker, Insight Environmental Consultants, at (661) 282-2200 or myself at (559) 685-3663.

Sincerely,



Andrew Howe
Director of Operations

cc: Global Ag Properties USA, LLC
Insight Environmental Consultants, Inc.



Legend

Roads

- Arterial
- Collector
- Highway
- Local
- Ramp
- Unpaved

County of Kern

Water Course

Sections

N

Scale: 1:53,448

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.