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April 10, 2013



Anne L. Olson, P.E.
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive # 200
Rancho Cordova, CA 95670-6114

1017-142961

Subject: Salad Cosmo USA Corporation
Temporary Well Development Discharge to Storage Pond

Dear Ms. Olson:

On behalf of Salad Cosmo USA, Brown and Caldwell (BC) is submitting this letter to the Regional Water Quality Control Board (Regional Water Board) to comment on the tentative Waste Discharge Requirements for the Salad Cosmo USA facility located at 5944 Dixon Avenue West, Dixon, California.

Recommended WDR Corrections

WDR Item 3: The first of the facility APN numbers is list as 103-030-03 should be corrected to 109-030-03.

WDR Item 9: first line. Please correct "1.5 percent" to "1.5 ppm"

Recommended MRP Recommended Changes

The MRP requires monthly monitoring reports to be submitted to the Board containing daily, weekly, and quarterly water quality monitoring data. This requirement is consistent with the current MRP requirements followed by Salad Cosmo.

BC recommends an adjustment in the required reporting frequency from monthly to quarterly. The recommendation is based on the following justifications from the WDR conclusions and MRP requirements:

- The facility operation has "minimal effect" on the source water quality.
- The wastewater is not likely to cause groundwater quality to exceed the most stringent agricultural water quality.
- The treatment and control measures are equivalent or better than those employed by similarly-situated dischargers and are considered Best Practical Treatment Control for this type of discharge.
- The treatment and water quality is consistent with the State Water Resources Control Board Antidegradation policy and is not considered a threat to groundwater quality.
- The MRP wastewater quality data is required on a quarterly basis; therefore, additional monthly submittals are not anticipated to provide the Board with useful information that can be used to determine compliance with water quality requirements or goals.

Should you have any questions, please do not hesitate to call me at 530-204-5204.

Very truly yours,

Brown and Caldwell

A handwritten signature in purple ink that reads "Ronald W. Crites".

Ron Crites, Project Manager