

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 5-6 December 2013**

**Response to Written Comments for The Garlic Storage Company, LLC,  
Shafter Garlic Processing Plant  
Tentative Waste Discharge Requirements**

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At a public hearing scheduled for 5 and 6 December 2013, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board), will consider adoption of Waste Discharge Requirements (WDRs) for discharges from The Garlic Storage Company, LLC (Garlic Company) Shafter Garlic Processing Plant (Plant). This document contains responses to written comments received from interested parties regarding the tentative WDRs initially circulated on 23 August 2013. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 27 September 2013 to receive full consideration. Comments received were from the Garlic Company.

Written comments from the above interested party are summarized below, followed by the responses of Central Valley Water Board staff.

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**THE GARLIC STORAGE COMPANY, LLC (GARLIC COMPANY) COMMENTS**

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On 18 October 2013, Daniel Burgard, Principal Soil Scientist at Cascade Earth Sciences, submitted written comments on the tentative WDRs by email on behalf of the Garlic Company.

The comments are paraphrased below.

**Garlic Company Comments – Comment No. 1:** Finding 5 of the tentative WDRs does not include peppers in the description of products processed at the Plant.

**RESPONSE:** The requested changes have not been made. The description in the fourth sentence in Finding 5 includes pepper processing.

**Garlic Company Comments – Comment No. 2:** Finding 11 of the tentative WDRs refers to the irrigation system as a pivot and handline sprinklers. The current irrigation system is big gun solid set sprinklers with six zones. This may be an error that needs to be corrected given that Discharge Prohibition A.3 prohibits “discharge of waste at a location or in a manner different from that described in the Findings.”

**RESPONSE:** The requested changes have been made. The change clarifies that sprinkler irrigation is used to evenly spread the wastewater over the Use Area, and corrects the current system type. The change should improve how Prohibition A.3 may be interpreted to allow the Garlic Company greater flexibility with how it implements sprinkler irrigation.

**Garlic Company Comments – Comment No. 3:** Finding 21 of the tentative WDRs indicates that the Groundwater Monitoring Well Installation Work Plan required by a 23 August 2013 Order from the Executive Officer (pursuant to Water Code section 13267) was due on 23 September 2013. The Work Plan was actually due 18 October 2013.

**RESPONSE:** The requested changes have been made.

**Garlic Company Comments – Comment No. 4:** Use Area Specification D.6 prohibits discharge of process wastewater to the Use Area “within 24 hours of a storm event of measurable precipitation or

when soils are saturated.” Another provision already prohibits runoff leaving the Use Area. All runoff is captured onsite. A small, measurable precipitation event (e.g., 0.10 inches) can wet the soil surface and make irrigation more efficient. Also, a precipitation event may be measurable and insignificant (0% effective). Either eliminate the prohibition or modify it to prohibit irrigation only during a storm event that results in runoff.

**RESPONSE:** The requested change has been made in the form of changes to Use Area Specification D.6. The Specification no longer prohibits all discharges within 24 hours of a measurable precipitation event, but still prohibits discharge to saturated soils.

**Garlic Company Comments – Comment No. 5:** Change Solids Disposal Specification E.1 to allow land application of settled solids from the bottom of the wastewater pond, provided the solids are properly characterized and applied at appropriate rates.

**RESPONSE:** The requested changes have been made. As part of its application for WDRs, the Garlic Company proposed to discharge all solid waste offsite and has not submitted any information to characterize the settled solids from the wastewater pond. Solids Disposal Specification E.1 has been changed to allow disposal of settled solids from the bottom of the wastewater pond to either an offsite facility permitted to accept the waste or in accordance with an alternate disposal plan prepared by a licensed engineer and approved by the Executive Officer.

**Garlic Company Comments – Comment No. 6:** Reduce the monitoring frequency in the tentative Monitoring and Reporting Program for General Minerals and all other parameters, biochemical oxygen demand, total dissolved solids, fixed dissolved solids, nitrogen, etc. Weekly monitoring seems excessive (especially for general minerals) given the 11-year monitoring history already in the record.

**RESPONSE:** The requested changes have been made, in part. The Effluent Monitoring frequency has been reduced from weekly to monthly for General Minerals analysis only. Given the high variability of wastewater character, especially considering upcoming process changes the Garlic Company has proposed, weekly effluent monitoring is appropriate for salinity, pH, nitrogen species, suspended solids and BOD.

**Garlic Company Comments – Comment No. 7:** Under Source Water Monitoring in the Monitoring and Reporting Program, the Sample Type for flow-weighted average EC should be “Grab” rather than “Computed average.”

**RESPONSE:** The requested change raises the issue that there is no sample type associated with a computed value apart from the sample(s) analyzed to provide the original data for computation. Rather than list “Grab” as the Sample Type for the computed flow-weight average source water EC, the Sample Type designation has been removed from all computed values in the Monitoring and Reporting Program. The monitoring required to obtain data for computations has been added to tables of monitoring requirements, rather than only listing the computed values, in order to clarify the required Sample Type (e.g., “Grab” for Source Water Monitoring EC). The changes only provide clarification and do not affect monitoring or reporting requirements.