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THE MORNING STAR PACKING COMPANY, L.P.

BEFORE THE CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

STATE OF CALIFORNIA

In the Matter of The Morning Star Packing Company, L.P., Respondent.	ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R5-2015-0549 **THE MORNING STAR PACKING COMPANY, L.P.'S LEGAL, POLICY AND TECHNICAL STATEMENT IN SUPPORT OF OPPOSITION TO THE CENTRAL VALLEY WATER BOARD PROSECUTION TEAM'S ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R5-2015-0549**

I. INTRODUCTION & SUMMARY OF ARGUMENT

The Prosecution Team does ***not*** allege that The Morning Star Packing Company, L.P. ("Morning Star") violated any substantive provisions of the 2013 Waste Discharge Requirements ("WDRs") at issue in this proceeding, ***nor*** does the Prosecution Team establish that Morning Star is degrading water quality. Instead, the grounds underlying the Administrative Civil Liability Complaint ("ACLC") and its proposed fine[1] are premised upon allegedly unpermitted pond expansions of a "Cooling Pond" and "Settling Pond" being "in a manner different from that described in the Findings" and a "material change."[2]

The ACLC and its proposed fine fail as a matter of law, science, and fact, for the following reasons:

(1) Expansion of the Cooling Pond was not unpermitted nor is it a violation of the WDRs because:

(a) the WDRs explicitly *acknowledge anticipated expansion* in Paragraph 28 of the Findings;

(b) *expansion of the Cooling Pond was not necessary* for the facility's production expansion;

(c) the Prosecution *Team improperly assumes that a decrease in the Land Application Area adversely impacts groundwater quality*, despite the fact that Morning Star uses significantly less water (and energy) than permitted, resulting in less flows that are proportionate to the acreage upon which wastewater discharge is applied;

(d) reduction in the Land Application Area as a result of Cooling Pond expansion *did not create BOD overloading* (to the extent any such overloading occurred); and

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[1] The Prosecution Team submitted an *Amended* ACLC on December 24, 2015, which modified its "economic benefit" calculation upward from approximately $871,000 to $900,000, with the total proposed fine remaining $1.5 million.

[2] *See,* ACLC, page 3, paragraphs 11 and 13 referring to the Cooling Pond, and page 6, paragraph 28 referring to the Settling Pond. Ironically, Paragraph 28 in the WDRs' Findings upon which this proceeding is based, explicitly acknowledges that Morning Star would be expanding its operations by up to the amount it did expand - 65%.

(e) *expansion of the Cooling Pond did not result in adverse impact to groundwater quality.*

(2) Expansion of the Settling Pond was not unpermitted nor is it a violation of the WDRs because:

(a) the *WDRs' reference to the size of the Settling Pond is an inadvertent error*, evident from the fact that expansion was completed prior to issuance of the WDRs and groundwater data and water quality assumptions in the WDRs reflects information that takes the expansion into account;

(b) the WDRs, the proceedings associated with issuance of the WDRs, and current data support a conclusion that groundwater quality is *not* impacted or otherwise associated with the Settling Pond[3]; and

(c) the expansion was contemplated and suggested by Regional Board staff.

(3) Calculations for the proposed fine against Morning Star are significantly flawed as a result of improper application of the scores and characterizations assigned, incorrect calculation of "economic benefit," and underlying technical assumptions, including, without limitation, as to seepage, all of which are more particularly described herein.

Ultimately, Morning Star is not subject to a fine.

II. FACTUAL BACKGROUND

Morning Star is the industry-leading tomato food processor. In that capacity, Morning Star recognizes its responsibilities, evident from undertaking innovative measures to conserve water and energy consumption during its manufacturing and operations processes over its entire history.[4]

Contrary to reality, the ACLC and supporting documents contain emotionally-charged, inflammatory statements alleging that Morning Star acted with "negligent behavior" and has "demonstrated a complete disregard for the Board's regulatory process prior to making material

[3] Morning Star Exhibit K ("MS Exh.")
[4] Exh. B to MS Exh. O.

changes to its operations."[5] Morning Star objects to all such comments as being baseless and potentially misguiding impressions about Morning Star that could adversely impact Morning Star. All such inflammatory statements should be stricken, for at least the following reasons: (i) Morning Star voluntarily invited Regional Board staff to Morning Star's Williams Facility after the 2015 production season to discuss operations and concerns, including as to odor; and (ii) Regional Board staff, not Morning Star, demonstrated disregard for its own responsibilities and processes by failing to process Morning Star's Report of Waste Discharge ("ROWD") for *seven* (7) years, from 2005 to 2012, before contacting Morning Star to proceed with the 2013 WDRs.

Despite Morning Star's diligence with its ROWD submission, and its invitation to Regional Board staff for an onsite meeting during the 2015 season (e.g., "regard" for the process), Regional Board staff's conduct directly contributed to the events complained of now. Specifically, paragraph 28 of the WDRs acknowledges Morning Star's intent to expand its operations, including the Cooling Pond, by up to the amount it did expand - 65%. As to the Settling Pond, Regional Board staff's inaction for seven (7) years on the ROWD created an administrative omission and precluded Morning Star from obtaining accurate WDRs for Morning Star's operations.

The Regional Board staff cannot have it both ways - expecting diligence and compliance with obligations from dischargers, without doing so itself as the regulating entity. Yet, that is precisely what staff has done by failing to act for seven (7) years on Morning Star's ROWD from 2005, and accepting Morning Star's invitations to visit the Williams Facility, only for Regional Board staff to react as it has with enforcement based on unsubstantiated grounds. To move at the pace and in the manner that staff has with Morning Star impedes, if not precludes, effective regulation, as well as innovative and/or efficient business operations, among other things.

[5] *See, e.g.,* ACLC, page 5, and ACLC Exh. A, pages 6-8 referring to State Water Resources Control Board *Water Quality Enforcement Policy (Effective May 20, 2010)* ("Enforcement Policy"), Water Quality Enforcement, Step 4, Adjustment Factor for culpability.

As for prior enforcement against Morning Star, Regional Board staff fail to recognize that the 2013 WDRs acknowledge that the 2005 enforcement action was resolved,[6] thus speaking to Morning Star's record for compliance, rather than non-compliance.

Ultimately, the ACLC states that the Regional Board is seeking civil penalties against Morning Star for violations of WDRs Order R5-2013-0144, specifically because the size of the Cooling Pond and Settling Pond at Morning Star's facility in Williams have increased.[7] Based on the ten-step evaluation described in the State Water Resources Control Board's *Water Quality Enforcement Policy* to determine civil liability assessed against a discharger, the Prosecution Team has recommended an administrative civil liability against Morning Star in the amount of one million five hundred thousand dollars ($1,500,000).

For the reasons stated herein, no penalty should be assessed.

III. ARGUMENT

A. Expansion of the Cooling Pond Does Not Violate the WDRs

The ACLC alleges that expansion of the Cooling Pond violates Discharge Prohibition A.3 of WDRs, which states: "Discharge of waste at a location or in a manner different from that described in the Findings is prohibited." It is notable that the ACLC finds a violation based solely on the Prosecution Team's interpretation of how the facility is described in the Findings of the WDRs and does not allege any violation of a specific discharge requirement or prohibition, nor any actual impact to water quality as a result of the expansion of the Cooling Pond. More important, however, is that the Cooling Pond expansion is specifically contemplated by and accounted for in the WDRs, and the expanded Cooling Pond is not different from that described in the Findings.

[6] Exhibit D, pp. 15, MS Exh. A.
[7] ACL Complaint, pages 4 through 5.

In fact, the WDRs specifically state that "[t]he Discharger plans to increase production by up to 65 percent in the future...."[8] The Cooling Pond is part of the facility production process.[9] The expansion of the Cooling Pond from 60 acres to 100 acres represents a 65% increase in the Cooling Pond size. Prior to issuance of the 2013 WDRs, Morning Star notified Regional Board staff of its intent to increase production by 65% so that the production increase could be accounted for in the 2013 WDRs. Morning Star's intent was to ensure that the WDRs accounted for a 65% increase in its entire production process, which includes the Cooling Pond. Indeed, the Cooling Pond is a surrogate for cooling towers or some other mechanical method of cooling the process water prior to recycling it back into the process.[10] While the Cooling Pond has the potential to discharge wastewater and is, therefore, regulated by the WDRs, it is not operated as a wastewater disposal pond.

The ACL also asserts that the expansion of the Cooling Pond at the expense of decreasing the size of the LAA is a "material change in the character, location, or volume of discharge" requiring submittal of a new ROWD.[11] As noted, the WDRs contemplated this expansion and, therefore, a new ROWD was not required. Moreover, the Cooling Pond expansion does not represent a "material change in the character, location, or volume of discharge." *The expansion of the Cooling Pond did not change the character of the wastewater, nor did it change the volume of wastewater being discharged or restrict the adequacy of the land available to meet the discharge requirements.* As to location, the expanded Cooling Pond is located in an area that was previously used for land application and even if Staff's contention that Cooling Pond water should be considered wastewater is accepted, it is authorized to receive wastewater application.[12]

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[8] WDRs, ¶ 28.
[9] *See*, 1995 WDRs ¶¶ 3 and 16; WDRs Attachment C (Process Flow Diagram).
[10] 1995 WDRs, ¶ 3; WDRs ¶ 16 and Attachment C; MS Exh. K.
[11] ACLC, ¶ 19.
[12] ACLC, ¶¶ 19, 21.

In fact, the quality of wastewater subject to contact with groundwater applied in the expanded Cooling Pond area is of better quality than the wastewater authorized to be applied to this land as part of the LAA.[13]

The ACLC incorrectly assumes, without any evidence, that expansion of the Cooling Pond and associated removal of approximately 90.5 acres of LAA allowed for increased wastewater discharges to the Cooling Pond and the potential to impact groundwater.[14] Because the Cooling Pond expansion was contemplated by the WDRs, it does not result in a material change to the character, location or quantity of discharge, and has no adverse impact on water quality. Therefore, no penalty should issue for expansion of the Cooling Pond.

B. Expansion of the Settling Pond Does Not Violate the WDRs

As the ACLC acknowledges, the Settling Pond was expanded, *prior to issuance of the applicable WDRs.*[15] The failure of the WDRs to accurately describe the size and capacity of the Settling Pond is an oversight and technical error, but does not have any adverse impact to groundwater quality and should not form the basis for a penalty.

Morning Star submitted a ROWD to support the existing WDRs in 2005. For seven (7) years, Regional Board staff took no action on the ROWD and failed to communicate with Morning Star regarding its status.[16] It was not until 2012 that Regional Board permitting staff contacted Morning Star requesting additional information about the operations. Morning Star readily responded to all inquiries, but the modification to the Settling Pond was overlooked during this process. Morning Star recognizes the importance of accurately describing its operations in the WDRs, but in this instance, the significant time lag and the lack of staff diligence to process the ROWD resulted in an oversight. Such an oversight that reflects only a

[13] MS Exh. K.
[14] MS Exh. K and M.
[15] ACLC, ¶ 23.
[16] Exh. B to MS Exh. O.

minor error in describing the size of the Settling Pond (enlarged from approximately 1 acre to 2 acres compared to the 100 acre Cooling Pond and 485 acres of LAA), without any impact to water quality as a result of such description error, does not warrant imposition of a civil penalty.[17]

As with the Cooling Pond, the Settling Pond expansion has no potential to impact water quality.[18] The 2013 WDRs acknowledged the significantly low risk to water quality from operation of the Settling Pond and, as a result, the Regional Board reduced the water quality monitoring requirements associated with the Settling Pond as compared to the prior WDRs.[19] Similarly, Regional Board staff made clear that it had no concerns regarding potential expansion of the Settling Pond when they testified at the hearing on the WDRs that "… we believe that it's, it's probably not a big deal to do some earth work and you know, make the pond a little bigger to accommodate a little more holding time."[20] Because the discrepancy in the Settling Pond size, as described in the WDRs compared to the actual facility, was simply an oversight in preparation of the WDRs, and because the Settling Pond in its current configuration has no potential to impact water quality, no penalty should issue for Settling Pond expansion.

C. The Calculation of the Penalty is Not Supported by the Evidence

As noted, there is no basis for any penalty in this case. The ACLC proposes a total penalty of $1.5 million, using a per gallon discharge calculation.[21] Even assuming, *arguendo*, that expansion of the Cooling Pond and Settling Pond are a technical violation of the Findings in the WDRs, the Prosecution Team's calculation of the appropriate penalty is grossly excessive in light of the nature of such alleged technical violation and the lack of harm to water quality or beneficial uses.

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[17] MS Exh. K and M.
[18] MS Exh. N.
[19] *See, e.g.,* Prosecution Exh. 49.
[20] Exh. D, pp. 20-21, MS Exh. A.
[21] ACLC, page 9, ¶ 38.

1. Calculation of Cooling Pond Penalty is Excessive

Step 1 Factor: Potential Harm To Beneficial Uses

The Prosecution Team has assigned a score of 3 (moderate) to the harm or potential harm to beneficial uses, based on: (i) groundwater depth ranging between 1.7 to 3.2 feet below the base of the Cooling Pond; (ii) additional seepage from the pond expansion; and (iii) discharging wastewater to less land application area.[22]

With respect to seepage, the ACLC significantly overstates the "additional seepage" that may have resulted from Cooling Pond expansion. The actual "additional seepage" that could have resulted from Cooling Pond expansion is negligible and is of considerably higher quality than the groundwater or the wastewater standards for LAA application.[23]

In regards to the allegation that Morning Star is discharging wastewater to less land, the ACLC fails to account for the significant less water use by Morning Star's current operations, specifically by using approximately 1.6 million gallons for 485 acres (3,300 gallons/acre/day), rather than the *maximum* permissible use of up to 4.3 million gallons for up to 695 acres (6,200 gallons/acre/day). Ultimately, the potential for harm factors applied to this "discharge" are not commensurate with the actual potential for harm (approximately one-half the potential volume of water application and one-half of the maximum target BOD loading). Moderate harm is defined as "impacts are observed or reasonably expected and impacts to beneficial uses are moderate and likely to attenuate without appreciable acute or chronic effects."[24] Here, there are *no* observed impacts to beneficial uses and, in fact, impacts to beneficial uses are *not* reasonably expected.[25] The appropriate score for this alleged violation is 0 (negligible).

Step 1 Factor: Degree of Toxicity of the Discharge

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[22] ACLC, Exh. A, p. 2.
[23] MS Exh. K.
[24] State Water Resources Control Board *Water Quality Enforcement Policy*, p. 12.
[25] MS Exh. M.

Similarly, the Prosecution Team assigned a score of 2 (moderate) to the physical, chemical, biological, or thermal characteristics of the discharge because "the discharged material poses a moderate risk that salinity in the groundwater will increase, impacting agricultural and drinking water beneficial uses." [26]

It is notable that the Cooling Pond water is of consistently higher quality than that authorized to be discharged to the LAA, including the former LAA that is now encompassed by the Cooling Pond.[27] The character of the discharge, therefore, is better than what is authorized for discharge and, therefore, does not "have some level of toxicity or pose a moderate level of concern regarding receptor protection."[28] An appropriate score for this alleged violation is 0 (negligible).

Accordingly, the final score for Potential for Harm should be zero.

Step 2: Assessment for Discharge Violations

With regard to the deviation from discharge requirements, the Prosecution Team has assigned a score of 3 for Potential for Harm and Extent of Deviation from Requirements as major.[29] As stated, the expansion provided no additional potential for harm, but provided the opportunity for improvement in groundwater quality.

The expansion of the Cooling Pond does not represent a major deviation from the WDRs because, even if there was a misunderstanding between Regional Board staff and Morning Star regarding the future of the Cooling Pond size, Morning Star always intended that the Cooling Pond would be expanded as part of its production expansion. A misunderstanding and/or varying interpretations between Regional Board staff and Morning Star does not warrant characterization

[26] ACLC, Exh. A, pp. 3 and 4.
[27] MS Exh. K.
[28] MS Exh. K, M.
[29] ACLC, Exh. A, pp. 4-6.

of a major deviation. Rather, an appropriate characterization is minor - "while the requirement was not met, there is general intent by the discharger to follow the requirement."[30]

Step 4: Adjustment Factors

The multipliers applied for culpability, cleanup and cooperation and history of violations[31] are inappropriate in light of the simple misunderstanding between staff and Morning Star. As more particularly described above under Factual Background, and contrary to the grounds for the proposed multipliers, Morning Star expanded the Cooling Pond with the clear communication of its intent and understanding that such expansion was authorized in the WDRs. This "discharge" should be characterized as "accidental" because it clearly was not Morning Star's intent to expand the Cooling Pond in violation of the WDRs. Rather, Morning Star understood that the WDRs allowed expansion of its process facilities, including the Cooling Pond, by 65%.

As for cleanup and cooperation, upon receiving the Notice of Violation, Morning Star invited Regional Board staff to the facility to allow for an open exchange of information and dialog about its compliance with the WDRs. Morning Star also timely responded to all requests for information related to the Cooling Pond expansion and ability to comply with the loading requirements in the WDRs with the remaining LAA acreage, including, and based in part on, Morning Star voluntarily initiating a staff visit to the Williams Facility. Morning Star was immediately cooperative, has continued to engage in cooperative discussions with Regional Board staff, and has expressed its intent to submit a new ROWD as necessary to resolve any ambiguity in the existing WDRs. Thus, no multiplier should apply for culpability and for cleanup and cooperation.

2. ***Calculation of Settling Pond Penalty is Excessive***

Step 1 Factor: Potential Harm to Beneficial Uses

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[30] Enforcement Policy, p. 14.
[31] ACLC, Exh. A, pp. 6-8.

As with the Cooling Pond analysis, the Prosecution Team has also overstated the potential to harm and degree of toxicity, and in turn have applied inappropriate scores for these factors of 3 (moderate) and 2, respectively.[32] There is no evidence that the Settling Pond expansion has adverse impacts on water quality or beneficial uses.[33] Moreover, the staff's calculation of seepage from the expanded area of the Settling Pond is in error and grossly overstates any additional seepage that could have resulted from the expansion.[34] The ACLC also alleges dates of violations for the Settling Pond as: "The days of violation are the days in which the Settling Pond held wastewater, typically from the beginning of the processing season until a few days afterward…the 2012 processing season was 81 days…the 2013 processing season was 83 days…the 2014 processing season was 92 days long…and the 2015 processing season was assumed to be 92 days…therefore the days of violations are the cumulative days of each processing season, or 348 days."[35]

The ACLC unlawfully applies the WDRs retroactively given that the WDRs took effect in December 2013, yet the ACLC calculates the fine in part for the Settling Pond by looking to the 2012 season. Fundamental principles of due process prohibit retroactive application, and California statutes explicitly state that the WDRs are only in effect *after* adoption.[36] An appropriate score for potential to harm, therefore, is 0 (negligible).

Sept 1 Factor: Degree of Toxicity of the Discharge

For the reasons stated above, this factor is negligible and the appropriate score is 0. As with the Cooling Pond expansion, therefore, the total score for potential to harm should be zero.

Step 2 Factor: Assessment for Discharge Violations

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[32] ACLC, Exh. A, pp. 9-11.
[33] MS Exh. K and N.
[34] *Id.*
[35] ACLC, p. 6, ¶ 27.
[36] *See, e.g.,* Water Code sec. 13350(a)(2) referring to violations of requirements illustrates that the requirements must have been place during the time an alleged wrong is alleged to have happened.

Because the alleged violation resulted from an error in development of the WDRs, any deviation should be characterized as minor.

Step 4: Culpability

The expansion of the Settling Pond was completed prior to issuance of the WDRs, and the WDRs merely contain an error in describing the facility. Morning Star did not intentionally or negligently violate the WDRs by expanding the Settling Pond. Rather, Morning Star and Regional Board staff inadvertently failed to properly reflect the true size of the Settling Pond in the WDRs. This oversight does not warrant a multiplier for culpability. Similarly, for the reasons stated above, no multiplier should apply based on cleanup and cooperation.

3. *The Calculation of Economic Benefit is Incorrect (Step 8 of Enforcement Policy)*

The economic benefit calculation in the ACLC is fundamentally flawed for utilizing an improper concept *and* skewed application of that concept.

a. *Concept for Calculating Economic Benefit*

The appropriate methodology for calculating economic benefit is to compare the "as built" expansions to alternatives that Morning Star could have done but chose not to do. The ACLC, however, improperly sought through conjecture to calculate economic benefit by comparing pre-pond expansion and post-pond expansion financial circumstances, despite such circumstances containing many variables that are unrelated to the pond expansions and beyond Morning Star's control, such as market conditions and price. That is to say, contrary to Staff's belief, the pond expansions were not necessary for Morning Star's operations, including its expanded operations, but instead the pond expansions reflect Morning Star's business judgment for *how* to expand its operations compared to other alternatives, such as additional cooling towers and increased

pumping from the previous pond size. Morning Star's choice is considerably more environmentally friendly (less energy consumption, appellation and chemical use).

Accordingly, Morning Star elected expansion of these ponds, with the benefit of water, energy and chemical conservation, rather than alternative operational methods, to accommodate its processing.[37] Thus, to the extent any such economic benefit results from the pond expansions, including from utilizing a cooling pond to cool water, the methodology for calculating economic benefit should be derived from the differential cost of its next best alternative - such as either the cost of cooling towers or an additional pumping of water from a 60 acre pond - to do the same work done by the pond expansions, also taking into account that expansions to the Cooling Pond and Settling Pond bear construction and maintenance costs.[38]

Further demonstrating the ACLC's economic benefit methodology is wrong is the fact that as of January 8, 2016 the parties agreed by stipulation, as follows:

> Prior to entering into any formal stipulation, the parties would informally agree on a formulation for economic benefit that compares the as-built expansion to the most likely alternative expansion scenario. Agreeing on a final number in the formal stipulation would likely require some preliminary research and further discussion regarding the costs associated with the alternative expansion. Given the time remaining before the scheduled hearing date, and the fact that economic benefit is used solely to calculate a minimum penalty, such agreement would aim merely for a number that the parties can agree reflects a reasonable approximation of the alternative scenario, not engineer's precision. The latter notification will not commit either party to ultimately stipulating economic benefit; only exploring it further in good faith.

4. Legal and Policy Reasons Reduce the Proposed Fine

Also limiting Morning Star's liability is Water Code sec. 13350(c)(5) stating in pertinent part:

> A person shall not be liable under subdivision (b) if the discharge is caused solely by any one or combination of the following: Any

[37] Exh. B to MS Exh. O, ¶ 7 through 9.
[38] Exh. O, ¶ 10.

> other circumstance or event that causes the discharge despite the exercise of every reasonable precaution to prevent or mitigate the discharge.

Here, Morning Star has taken every reasonable precaution to maintain compliance with the WDRs.

In addition, the *Water Quality Enforcement Policy* states in pertinent part: "The calculated liabilities may be adjusted as a result of settlement negotiations with a violator."[39] Here, Morning Star made diligent and consistent efforts to work toward settlement, evident from timely submission of the waiver for a hearing within 90 days and stipulating as proposed by the Advisory Team regarding issues of "ability to pay" and "economic benefit."

IV. CONCLUSION

Morning Star operates its Williams Facility with a high regard for regulatory requirements, evidenced by its use of cutting-edge technology, maximizing water resource and energy efficiency rates, and inviting Regional Board staff onsite for transparency regarding Morning Star's operations. Regional Board staff have grossly mischaracterized the events leading to this enforcement action and based a penalty on Facility activities that staff were aware of, or should have been aware of, and that Morning Star believed to be authorized. Staff's lack of productive communication and responsiveness resulted in significant misunderstandings that could have been prevented and/or resolved in a more productive fashion. The fine as proposed in the ACLC is fundamentally flawed in concept and application. To accept the proposed fine would be contrary to the facts, science, law and state policy. Accordingly, Morning Star respectfully requests the proposed fine be rejected and that no penalty be imposed.

[39] *Water Quality Enforcement Policy*, p. 22.

DATED: January 13, 2016

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DECLARATION OF SERVICE

I declare that I am over the age of eighteen years and not a party to this action. I am employed in the City and County of Sacramento and my business address is 500 Capitol Mall, Suite 1600, Sacramento, California 95814.

On January 13, 2016, at Sacramento, California, I served the attached document(s):

THE MORNING STAR PACKING COMPANY, L.P.'S LEGAL, POLICY AND TECHNICAL STATEMENT IN SUPPORT OF OPPOSITION TO THE CENTRAL VALLEY WATER BOARD PROSECUTION TEAM'S ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R5-2015-0549

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed on January 13, 2016, at Sacramento, California.

Marilyn Sykes