

From: [Roger Turner](#)
To: [Mayville, Stephen@Waterboards](mailto:Mayville.Stephen@Waterboards)
Cc: [Bruce Scott](#); [Pat Bolt](#)
Subject: TENTATIVE GENERAL WASTE DISCHARGE REQUIREMENTS FOR CONCENTRATED ANIMAL FEEDING OPERATIONS (DAIRIES AND RELATED FACILITIES) WITHIN THE SANTA ANA REGION, ORDER NO. RS-2013-0001, NPDES NO. CAG018001
Date: Monday, January 21, 2013 3:42:01 PM

January 19, 2013

Stephen D. Mayville
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

**SUBJECT: TENTATIVE GENERAL WASTE DISCHARGE REQUIREMENTS FOR
CONCENTRATED ANIMAL FEEDING OPERATIONS (DAIRIES AND RELATED
FACILITIES) WITHIN THE SANTA ANA REGION, ORDER NO. RS-2013-0001,
NPDES NO. CAG018001**

Dear Mr. Mayville,

I appreciate the opportunity to offer the following comments for consideration;

Under Section **E. ENGINEERED WASTE MANAGEMENT PLANS AND NUTRIENT MANAGEMENT PLANS**, on page 17, Item number 2 requires, "Each Discharger shall design, construct and maintain containment structures to retain all wastewater within the facility, including all process wastewater and all precipitation on, and drainage through, manured areas resulting from rainfall up to and including a 25-year, 24-hour rainfall event".

On page 18, under Item 7, Waste Containment Facilities Construction, Operation and Maintenance Specifications, part b. requires, "Retention ponds and manured areas at CAFOs in operation on November 27, 1984, shall be protected from inundation or washout by overflow from any stream channel during 20-year peak stream flows. Facilities existing before November 27, 1984 that is protected against 100-year peak stream flows shall continue to provide such protection. New facilities (built after November 27, 1984) shall be protected from 100-year peak stream flows".

Existing CAFO facilities have been designed with certified Engineer Waste Management Plans (EWMP) approved by the Executive Officer, which include containment structures for holding all process wastewater, runoff from manured areas and all precipitation from storm events for a 25-year, 24-hour rainfall event onsite. This includes retention ponds and manured areas for a CAFO. On page 18, the permit requires retention ponds and manured areas at CAFOs in operation on November 27, 1984, shall be protected from inundation or washout by overflow from any stream channel during 20-year peak stream flows. Facilities existing before November 27, 1984 that are protected against 100-year peak stream flows shall continue to provide such protection. The concern arises with the new permit requirement that new facilities (built after November 27, 1984) shall be protected from 100-year peak stream flows. This adds considerable cost to the CAFO operator to built facilities and maintain them for the more rare 100-year storm event. The Regional Board should consider the requirement that the EWMP for a CAFO be designed for the 25-year, 24-hour storm event, which would provide for more protection than the 20-year peak stream flows and be consistent with the required CAFO protection for waste containment for onsite operations.

Kind regards,

Roger Turner

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