



Quad Knopf

050360

May 21, 2007

Mr. W. Dale Harvey
Senior Engineer
California Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

RE: Comments on California Dairies, Inc., Los Banos Foods, Inc., NPDES Permit Renewal (NPDES No. CA0082082)

Dear Mr. Harvey,

We have reviewed the subject permit on behalf of California Dairies Inc., Los Banos Foods, Inc. and have the following comments:

1. Reference: Section IV, A, 2, Table 7. The correct units for Chromium VI and Copper should be $\mu\text{g/L}$ (not Mg/L).
2. Reference: Section VI, C, 1, c and Attachment F, V, B, 1, a. The NPDES permit does not require pollution prevention plans for selenium and zinc. These sections are in conflict.
3. Reference: Section VI, C, 7, a, *i and ii* and Attachment E, X, D, Table E-7. CDI requests that the progress reports be annual not semi-annual.
4. Reference: Attachment E, IV, A, 1, Table E-2. Daily monitoring of settleable solids and weekly monitoring of total suspended solids is excessive, given the nature of the discharge. CDI requests 1/month monitoring consistent with other monitoring.
5. Reference: Attachment F, II Facility Description. A corrected description is as follows:

“The Facility completed renovation repairs on the Rogers evaporator / dryer systems (used in the processing of fluid and dry milk) during February 2006. Source well #3 was taken offline, and all process wastewater previously discharged with the effluent has since been *eliminated or* directed to the City of Los Banos Sanitary Sewer. This has resulted in a significant reduction in

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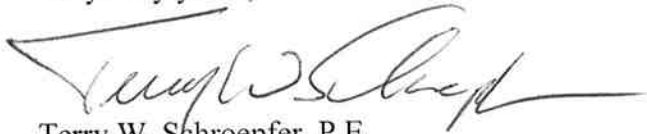
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the volume of effluent discharge from the Facility. The current discharge is comprised solely of single-pass, non-contact cooling water from the pasteurizing processes and the evaporators. The non-contact cooling waters are commingled in a Rogers Sump *Header* prior to discharge.” (Note changes are shown in *italic* font)

Thank you for your consideration in this matter. If you have questions or need any additional information, please call.

Very truly yours,



Terry W. Schroepfer, P.E.
RCE 26386, Expire 3/31/08

Cc Moroni DeBruin
Sy Le
Ronald Thompson
Jack Spankowski