

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 8/9/10 December 2010**

**Response to Written Comments for
General Order for Dairies with Manure Anaerobic Digester or Co-digester
Facilities
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 8/9/10 December 2010, the Central Valley Water Board will consider adoption of General Order for Dairies with Manure Anaerobic Digester or Co-digester Facilities. This document contains responses to written comments received from interested parties regarding the tentative Waste Discharge Requirements (WDRs) circulated on 29 September 2010. Written comments were received from:

1. California Department of Resources Recycling and Recovery
2. County of Fresno Department of Public Health, Environmental Health Division
3. Dairy Cares
4. MT-Energie USA
5. Sustainable Conservation
6. Western United Dairymen
7. University of California, Davis

1 CALIFORNIA DEPARTMENT OF RESOURCES RECYLING AND RECOVERY

COMMENT 1.1: The Department of Resources Recycling and Recovery (CalRecycle) did not make a specific comment on the tentative WDRs, but did note that it has outlined its regulatory requirements relative to anaerobic digestion projects in a publication entitled *How Anaerobic Digestion Fits Current Board Regulatory Structure*. This document provides an overview of how the Title 14 requirements for permit/authorization apply to anaerobic digestion with consideration of the feedstock, source of the feedstock, location and quantity involved. Determination of the appropriate level of authorization or permit for any activity involving anaerobic digestion is made by the Local Enforcement Agency.

RESPONSE 1.1: The Order has been revised to require that the Discharger submit copies of each Notice Of Intent (NOI) and Facilities Information Report (FIR) to the Local Enforcement Agency (LEA). This requirement works well with the process described in the abovementioned publication, as the LEA will receive information that may assist it to determine appropriate levels of authorization.

2 COUNTY OF FRESNO DEPARTMENT OF PUBLIC HEALTH, ENVIRONMENTAL HEALTH DIVISION

COMMENT 2.1: Fresno County Department of Public Health, Environmental Health Division has received two proposals for two dairy manure anaerobic co-digesters that may use food byproducts as a secondary feedstock. This feedstock may include mammalian tissue. Fresno County questions whether Prohibition A.18, which prohibits the use of mammalian tissues in a co-digester or the application of these materials to a land application area, would prohibit this feedstock. Fresno County cites Title 14 Section 17855.2, which also prohibits the composting of mammalian tissue, except when from the food service industry, grocery stores, or residential food scrap collection, or as part of a research composting operation.

RESPONSE 2.1: Prohibition A.18 (now A.17) has been modified to allow the co-digestion of mammalian tissue as contained in compostable material from the food service industry, grocery stores, or residential food scrap collection. Prohibition A.17 in the WDRs presented for consideration by the Board will read:

“The use of biosolids, human waste (e.g., sludge, septage, domestic and municipal wastewater), or mammalian tissue (except as contained in compostable material from the food service industry, grocery stores, or residential food scrap collection), as a co-digester feedstock, or application of these materials to a land application area, is prohibited.”

3 DAIRY CARES

COMMENT 3.1: Dairy Cares supports the efforts of the Central Valley Regional Water Quality Control Board to develop clear regulatory guidelines for dairy manure digester and co-digester facilities, and expresses appreciation for the consistency between the tentative Order and Order R5-2007-0035 (Dairy General Order).

RESPONSE 3.1: Comment noted.

COMMENT 3.2: The Order’s “attempt to reduce the perceived risk posed by digesters – especially co-digesters... poses an unnecessary burden on digester/co-digester projects that would go beyond what R5-2007-0035 requires for dairies.” Dairy Cares states: “Dairies with digester/co-digester projects do not pose a significantly higher risk to water quality than dairies without such facilities (arguably dairies with digesters may actually pose a smaller risk to water quality).”

RESPONSE 3.2: This Order can apply to dairies that digest only manure produced at the dairy where the digester is located. It can also apply to dairies that digest imported digester feedstocks, be it manure from other dairies or other co-digestion feedstocks. The Order incorporates many provisions and specifications found in the Dairy General Order, in recognition of the many similarities between dairies operating without digesters, and dairies operating with digesters. However, dairies with digesters that import additional digester feedstocks present additional and different water quality issues which this Order addresses. Because this Order does not restrict the type of material used as co-digestion feedstocks, some additional monitoring data are needed to ensure protection of water quality.

COMMENT 3.3: Land Application Area Specification C.12 sets numeric salt loading limitations of 2,000 pounds per acre per year for single cropped field and 3,000 pounds per acre for multi-cropped fields. Implementation of a nutrient management plan prepared by a certified professional makes this unnecessary.

RESPONSE 3.2: Nutrient Management Plans do not typically address salt loading. There is typically a predictable relationship between nutrients and salts at facilities where only manure is land applied. Since the WDRs do not limit acceptance of co-digestion substrates to materials that have a similar relationship between nutrients and salts, there is the potential for salts to be discharged in amounts that could unacceptably impact water quality.

Recognizing that the amount of salt that could be applied and be protective of water quality is based on site specific conditions and the manner in which the discharge is applied to land, Land Application Specification C.12 has been revised in the tentative WDRs being presented for Central Valley Water Board consideration. The revisions address comment 3.2, as well as comment 6.5 by Western United Dairymen, which asked the Central Valley Water Board to specify which salts are limited by the land application requirements. Revised Land Application Area Specification C.12 now reads:

“Manure, digestate, and process wastewater applied to the land application area shall be at rates reasonable for the crop, soil, climate, special local situations, management system, and type of manure, digestate, and wastewater. In the absence of site specific data, reasonable application for non-nutrient salt shall mean that annual application rates shall not exceed 2,000 pounds per acre for fields that are single-cropped or 3,000 pounds per acre for fields that are multi-cropped. Non-nutrient salts include but are not limited to sodium, calcium, magnesium, carbonate, bicarbonate, chloride, sulfate, and nutrients (nitrogen, phosphorus, and potassium) not used by the

crop. If the non-nutrient salt loading exceeds the rates above, the Discharger must submit information to the Executive Officer demonstrating that its non-nutrient salt loading rates are protective of water quality. Actual application rates for both non-nutrient salts and nutrients (nitrogen, phosphorus, and potassium in amount actually used by crops) are required to be verified annually.”

The intent of the revision is that if the limitations are exceeded, the discharger is required to submit information to the Executive Officer demonstrating that the salt loading is protective of water quality.

COMMENT 3.4 (incorporated by reference to 23 August 2010 letter to Central Valley Water Board): A Salt Minimization Report is required as part of the Facility Information Report. This report is unnecessary for manure-only digesters.

RESPONSE 3.4: The Salt Minimization Plan will identify sources of salt and evaluate measures to minimize salt use on dairy digester facilities. The program EIR being prepared to comply with the California Environmental Quality Act (CEQA) must be certified by the Central Valley Water Board prior to consideration of the General Order for Dairies with Manure Anaerobic Digester or Co-digester Facilities. The program EIR (Chapter 5 – Hydrology and Water Quality) includes the preparation and implementation of a Salt Minimization Plan as a mitigation measure in section 5.3. The Salt Minimization Plan incorporated into the Order addresses this mitigation measure.

COMMENT 3.5 (incorporated by reference to 23 August 2010 letter to Central Valley Water Board): An Odor Management Plan is required as part of the Facility Information Report. This report should only be required for co-digestion at a new dairy facility, and when required, the requirements must not be excessive.

RESPONSE 3.5: The program EIR (Chapter 6 – Air Quality) discusses odor management plans as part of mitigation measure 6.3.b. The Notice of Intent for the Order requests an acknowledgement that an Odor Management Plan has been prepared to address this mitigation measure.

4 MT-ENERGIES USA

COMMENT 4.1: MT-Energies USA expressed support of this proposed modification to the (Dairy) General Order, which if passed will allow co-digestion within the Central Valle on existing facilities, and allow California to

produce more renewable energy without negatively impacting the environment.

RESPONSE 4.1: Comment noted.

5 SUSTAINABLE CONSERVATION

COMMENT 5.1: The term “solid waste” has a CalRecycle regulatory definition that the Central Valley Water Board may not have intended. The terms ‘residuals’ or ‘solids’ are suggested as alternatives.

RESPONSE 5.1: Comment noted. A definition of “solid waste” has been added to Attachment G of the proposed Order. The terms in this Order are not affected by CalRecycle regulatory definitions.

COMMENT 5.2: Prohibition A.7 prohibits the application of waste to land not owned or controlled by the discharger without written permission from the landowner or in a manner not approved by the Executive Officer. This could limit the attractiveness of this product and further discourage co-digestion as an economically viable option for dairies.

RESPONSE 5.2: This prohibition is consistent with the Dairy General Order (Prohibition A.8) that most dairies in the Central Valley Region must comply with. The intent of this prohibition is to provide assurance that the digester waste will be properly handled if it leaves the control of the discharger.

COMMENT 5.3: Prohibition A.14 prohibits the discharge of storm water to surface water from a land application area where waste from a manure-only digester has been applied unless the land application area has been managed consistent with a certified Nutrient Management Plan. Sustainable Conservation interprets this to mean that dairies will be effectively prohibited from selling or even giving away their digester co-products.

RESPONSE 5.3: Prohibition A.14 does not prohibit the selling or giving away of digester liquid or solid wastes. This prohibition is necessary to maintain the agricultural storm water exemption to National Pollutant Discharge Elimination System (NPDES) permitting requirements for wastes applied to lands owned or operated by the dairy. The prohibition does not apply to wastes that have been sold, given away, or otherwise transferred off-site to third parties. This prohibition is contained in the Dairy General Order and presents no increased burden for operating a digester.

6 WESTERN UNITED DAIRYMEN

COMMENT 6.1: Prohibition A.5 prohibits the addition of animal mortalities to digesters. Animal disposal is a critical public health and safety issue as existing mortality disposal options are lost. Digesters are being investigated as one alternative for mortality disposal by UC Davis. It is premature to rule out digesters with a blanket prohibition when that may be the safest alternative. Digesters can potentially assist in addressing the problem of losing disposal options while creating renewable energy.

RESPONSE 6.1: Comment noted. If future research indicates that animal mortalities can be safely digested and other involved agencies (e.g., Department of Food and Agriculture, Department of Public Health, etc.) agree that this activity can be performed without posing an adverse public health risk, the Order may be reopened and amended. The Dairy General Order also prohibits the disposal of dead animals in any liquid manure or process wastewater system (Prohibition A.9).

COMMENT 6.2: Prohibitions A.9 and A.15 disallow the discharge of tile drain water and storm water respectively from croplands for co-digester projects. This should not be an outright prohibition whenever a dairy happens to have a co-digester, but it should be based on the potential impacts to water quality. This also raises the question of whether this same requirement applies to soil amendments sold offsite.

RESPONSE 6.2: Prohibition A.9 has been modified as follows:

“Irrigation supply water that comes into contact or is blended with waste or wastewater shall be considered wastewater and its discharge to surface water from the land application area is prohibited.”

Prohibition A.15 has been removed.

Soil amendments sold offsite are subject to tracking manifest requirements similar to those required by the Dairy General Order for manure sold offsite.

COMMENT 6.3: Prohibition A.16 prohibits bypass or overflow of undigested non-manure feedstock. While we agree that this is undesirable, there may be cases of upset that require that something be done immediately with those feedstocks. There needs to be recognition of emergency situations where bypass/overflow is required. The WDR should seek to minimize these events and the impacts from these events without tying the hands of digester operator in the few cases where an emergency requires additional flexibility.

RESPONSE 6.3: Comment noted. Prohibition A.16 (now A.15) has been modified to require a demonstration by the Discharger that the bypass or overflow will not create a threat to water quality or nuisance, and approval by the Executive Officer prior to discharge of bypass or overflow of non-manure digester feedstock onto land application areas. Prohibition A.15 in the WDRs presented for consideration by the Board will read::

“Bypass or overflow of undigested non-manure digester feedstock onto the land application area is prohibited except when the Discharger has demonstrated to the Executive Officer’s satisfaction that such bypass or overflow is caused by a condition requiring such bypass or overflow, that the discharge of the bypass or overflow to the land application area will not create a threat to water quality or a condition of nuisance, and the Executive Officer has provided written approval of the discharge.”

COMMENT 6.4: Land Application Area Specification C.4 requires that a Nutrient Management Plan (NMP) be developed and submitted to the Board. This plan should remain on dairy available for Board staff inspection and not submitted to the Board unless it is requested by the Executive Officer.

RESPONSE 6.4: Comment noted. Language requiring submission of the Nutrient Management Plan has been removed from Land Application Area Specification C.4. Land Application Area Specification C.4 now reads as follows:

“Application of all process wastewater, manure, and digestate to the land application area shall be conducted in accordance with a NMP prepared by a specialist who is certified in developing NMPs. A copy of the NMP bearing the signature of the certifier shall be kept at the facility to be available for review at all times by site-operational personnel and Central Valley Water Board inspectors. The NMP shall reflect actual crops grown at the facility, the actual form of nutrients and non-nutrient salts applied to each field, and reasonable application rates. The NMP shall be submitted to the Central Valley Water Board upon request by the Executive Officer.”

COMMENT 6.5: Land Application Area Specification C.12 requires limitations on the application of salts to croplands. It is not specified which salts are limited or how they will be tested/measured. It should be noted that not all salts are problematic and some are essential plant nutrients. This issue is already addressed in the salt minimization plan and should not be in the land application specifications for all areas of the Central Valley Region.

RESPONSE 6.5: Land Application Area Specification C.12 has been revised to require salt loading limits for non-nutrient salts. Nutrient salts include

nitrogen, phosphorus, and potassium to the extent the plant actually uses those salts. Non-nutrient salts include but are not limited to sodium, calcium, magnesium, carbonate and bicarbonate, chloride, sulfate, and nutrients (nitrogen, phosphorus, and potassium) not used by the crop. See also response 3.2 to Dairy Cares comment on Land Application Area Specification C.12. Land Application Area Specification C.12 now reads as follows:

“Manure, digestate, and process wastewater applied to the land application area shall be at rates reasonable for the crop, soil, climate, special local situations, management system, and type of manure, digestate, and wastewater. In the absence of site specific data, reasonable application for non-nutrient salt shall mean that annual application rates shall not exceed 2,000 pounds per acre for fields that are single-cropped or 3,000 pounds per acre for fields that are multi-cropped. Non-nutrient salts include but are not limited to sodium, calcium, magnesium, carbonate, bicarbonate, chloride, sulfate, and nutrients (nitrogen, phosphorus, and potassium) not used by the crop. If the non-nutrient salt loading exceeds the rates above, the Discharger must submit information to the Executive Officer demonstrating that its non-nutrient salt loading rates are protective of water quality. Actual application rates for both non-nutrient salts and nutrients in amount actually used by crops are required to be verified annually.”

COMMENT 6.6: Table 1 requires that the annual report be approved by a Certified Nutrient Management Specialist (CNMS). The CNMS should prepare the NMP but the annual report should be prepared and certified by the facility owner and operator.

RESPONSE 6.6: The requirement for certification of the Annual Report by a Certified Nutrient Management Specialist has been removed from Table 1.

COMMENT 6.7: Attachment A, Notice of Intent footnotes seem to add requirements to digester projects that do not currently exist. An example of this is footnote iii which requires use of construction equipment with Tier II engines and that the engines must be checked by a certified mechanic prior to use. The footnotes should ensure that equipment is compliant with Air Resources Board regulations but not go beyond that.

RESPONSE 6.7: Attachment A, Notice of Intent contains a checklist to assist permit applicants in submitting the appropriate paperwork and performing the studies set forth in the Program EIR's mitigation measures that reduce potentially significant impacts to a less than significant level. The footnotes within the checklist are meant to assist in demonstrating the implementation of the Program EIR's mitigation measures. With regard to the example, the use of a Tier II engine is not a requirement, but was identified in the Program

EIR scoping process by the San Joaquin Valley Air Pollution Control District as a potential best management practice (BMP) where applicable. The statement that engines be checked by a certified mechanic prior to use has been removed from the footnote.

COMMENT 6.8: Attachment D, Contents of a Nutrient Management Plan, Technical Standards V.B.2.b states “if application of nitrogen exceeds 1.4 times total nitrogen”, the phrase “or 1.65” should be added after 1.4 to be consistent with the previous section. In addition, this section requires that the NMP be revised if the nitrogen limits are exceeded. In many cases it is not the NMP that must be revised but the nutrient applications.

RESPONSE 6.8: The number 1.4 was replaced with 1.65 to maintain consistency with the equivalent Technical Standard in the Dairy General Order.

COMMENT 6.9: The Monitoring and Reporting Program in general requires far more detail than is necessary. This level of detail fails to recognize the cost in time and money involved, and it includes some requirements which are simply unreasonable. We believe, for example, that the requirements outlined in item B.1.b.(1) in which weekly/monthly lagoon visual inspection of lagoon freeboard to the nearest 3 inches is excessive, as are the detailed flow meter calibration requirements. We also consider impractical and excessive the required nutrient monitoring: these requirements include daily EC monitoring of digester outflow and additional monitoring for digester effluent and feedstocks, including general minerals and a long list of other expensive analysis targets. The required frequency and list of analytes to be sampled should be minimized to include only those that provide reasonable and needed information. Also taken into consideration should be that the analyses would be useful to the digester operator in controlling digester operations.

RESPONSE 6.9: Comment noted. Extensive comments on the Monitoring and Reporting Program were also submitted by UC Davis and many of the issues raised in this comment are answered in response to UC Davis comments. The Monitoring and Reporting Program has been revised to be more consistent with the General Order for Existing Milk Cow Dairies and many of the issues commented on have been addressed as a result. See Responses 7.1–7.5 below.

Although many of the analytes required will be of use to the digester operator, the primary goal of the Monitoring and Reporting Program is to ensure compliance with the discharge provisions and specifications of the Order,

which are designed to allow digester operations and discharges to land in a manner protective of water quality.

COMMENT 6.10: Soil sampling within the Monitoring and Reporting Program should allow sampling 20% of the land application areas each year instead of all every 5 years. The resources of the professionals and laboratories involved in such sampling and analyses cannot handle a spike once every five years of this level.

RESPONSE 6.10: The requirement to monitor soils every five years was revised to allow the option to monitor 20% of the land application areas annually.

COMMENT 6.11: The analyses required for irrigation water and domestic well water are unreasonable, burdensome, and overly expensive. Specifically, the requirement to analyze for general minerals in the irrigation water and domestic well water provides no benefit or options for control. The sources of domestic and irrigation water are defined by the location of the dairy and cannot be readily changed or managed due to the results of analyses. We therefore recommend that general minerals be removed from the requirements for these two sources.

RESPONSE 6.11: The Monitoring and Reporting Program requirement to monitor domestic and irrigation water sources for General Minerals analysis of irrigation well and domestic well samples was revised to require monitoring once every five years, with an option to monitor 20% of the wells annually..

COMMENT 6.12: Due to the arid climate in the Central Valley, weather conditions should not have to be recorded during dry periods, only when applications occur during rainy periods.

RESPONSE 6.12: The Monitoring and Reporting Program requirement has been changed to require the discharger record weather only if it rains on the day of a waste application to a land application area.

7 UNIVERSITY OF CALIFORNIA DAVIS

COMMENT 7.1: The monitoring requirements, laboratory accreditation, and sampling requirements should be consistent with the Existing Milk Cow Dairy General Order - R5-2007-0035 (Dairy General Order). The monitoring requirements would be more familiar if they were presented in tables. The Monitoring and Reporting Program is inconsistent and conflicting, paragraph three of the posted Monitoring and Reporting Program should be rewritten.

The analytic requirements to sample non-manure feedstocks, digestate, and digester output on quarterly then semi-annually basis, are excessive.

RESPONSE 7.1: Comment noted. Tables have replaced the narrative sampling and analysis paragraphs throughout the Monitoring and Reporting Program. The section describing laboratory accreditation requirements and analytical methods has been modified to reference the published available documents portion of the Dairy General Order. See also responses to Comment 7.4.

COMMENT 7.2: Some of the language in the Visual Inspection section is inconsistent with the Dairy General Order. Specifically the definition of freeboard, the statement “no earlier than 1 September and no later than 1 November”, and the requirement to inspect and note water supply wells daily during wastewater application (posted version Section B.2.a.(3) Visual Monitoring, Land Application Area). Additionally, the monthly requirement to observe and note areas of crops that are stunted or have no growth (posted version Section B.2.b.(1) Visual Monitoring, Land Application Area) needs to be clarified.

RESPONSE 7.2: The Order defines freeboard as the elevation difference between the liquid level in a pond and the lowest point of the pond embankment before it can overflow. The Visual Inspection section of the Order requires verification that such freeboard is at least two feet for above-ground ponds and one foot for below-ground ponds. The statement “no earlier than 1 September and no later than 1 November” has been changed to “between 1 September and 1 November.” The requirement for daily observation of water supply wells and crops has been removed.

COMMENT 7.3: The requirement to limit the method of measurement of wastewater to flow meters is restrictive.

RESPONSE 7.3: The requirement that limited flow measurement to flow meters has been removed, consistent with the General Order for Existing Milk Cow Dairies.

COMMENT 7.4: Review UCCE comments on Monitoring and Reporting Program for Existing Milk Cow Dairies.

RESPONSE 7.4: Comment noted. The UCCE comments on the Monitoring and Reporting Program for the Dairy General Order include suggested modifications to be consistent with previously accepted methods, such as to allow laboratory analysis where field measurement is specified, to specify soluble phosphorus in soil rather than total phosphorus, allow microwave

moisture determination for manure manifested off-site, and require only copies of new wastewater agreements each year (i.e., not resubmittal of existing agreements. Except for the use of microwave moisture determination, all these changes were made. Adding a specific statement to the Monitoring and Reporting Program regarding the use of microwave moisture determination is not necessary because it allows for alternative methods as long as they are approved by the Executive Officer.

The UCCE comments also suggested changes to the requirements for monitoring, such as:

- a. Redefine the wet season as 15 October through 15 April;

The defined wet season was changed from 1 October through 31 May to 1 October through 30 April to more closely match the period of the year when precipitation is likely.

- b. Remove the requirement to inspect land application areas prior to each irrigation event;

The requirement to inspect land application areas before each irrigation event was not removed as this is necessary for the irrigator to verify that controls are in place to prevent bypass or overflow of irrigation water off site. However, the requirement to keep records of those inspections was removed. Records only need to be kept to document problems or changes resulting from the inspections.

- c. Remove biennial requirement for macromineral analysis and revise requirements for sulfate, carbonate, and bicarbonate in manure;

Because of the variable nature of potential co-digestate feedstocks, the requirement for general minerals analysis was not removed. The requirement for sulfate monitoring in manure was changed to sulfur and the carbonate and bicarbonate requirements were removed.

- d. Restore statement that soil testing for nutrients is recommended, but not required;

The requirement for soil testing was revised to “recommended.” Because the General Order includes a limit on nutrient loading, over the long term, soil testing may not be necessary every year.

- e. Modify record keeping requirements for weather conditions to require “exception” reporting [i.e., only report if adverse conditions (e.g., precipitation, standing water) occurred prior to, before, and after irrigation events; otherwise, the assumption would be that conditions were normal];

The record keeping requirement was changed as requested.

- f. Remove requirement for TDS and ammonia analyses of supply wells;
- The requirement for ammonium and total dissolved solids analysis was not removed. The ammonium analysis is needed to identify whether reduced forms of nitrogen are present. This could occur due to natural reducing conditions, overwhelming of the oxidation potential of the aquifer, or the presence of a preferential pathway for waste migrating from the surface to groundwater. The total dissolved solids analysis is needed to quantify the concentration of dissolved solids in groundwater and supply water. Although the general relationship between electrical conductivity and total dissolved solids is known, having the actual dissolved solids data will allow for refining this relationship on a site-specific basis and may identify questionable electrical conductivity data resulting from improper meter maintenance or calibration. The Monitoring and Reporting Program was revised to allow, after two years of data are provided to the Executive Officer, that the ammonium and total dissolved solids monitoring frequency be reduced to once every five years.

COMMENT 7.5: Remove or clarify the following items:

- a. General Monitoring Requirements Item 3 – duplicative sampling documentation ;
- b. General Monitoring Requirements Item 7 – holding times and protocols should be part of an approved sampling and analysis plan, not specified in the Monitoring and Reporting Program;
- c. Change due date for annual report to be consistent with Dairy General Order;
- d. Annual Reporting Requirements Item 7 – allow tabulated EC data rather than require submittal of individual monthly EC data in the annual report;
- e. Annual Reporting Requirements Item 13 – based on definition of salt, there is no way for operator to revise the nutrient management plan to address exceedances of the salt limit in the Order;
- f. Define non-nutrient salts.

RESPONSE 7.5: Comments are noted.

- a. General Monitoring Requirements Item 3 has been removed;
- b. General Monitoring Requirements Item 7 has been removed;
- c. The Annual Report due date has been changed to 1 July;

- d.** The requirement to submit monthly data in the annual report has been removed;
- e.** The Annual Reporting Requirement has been clarified to be consistent with the Waste Discharge Requirements, Land Application Specification C.12 and requires submittal of a statement regarding revision of the facility's Salt Minimization Plan or justification of a higher salt limit;
- f.** The definition of non-nutrient salts has been clarified in the Order to read:

"Non-nutrient salts include but are not limited to sodium, calcium, magnesium, carbonate, bicarbonate, chloride, sulfate, and nutrients (nitrogen, phosphorus, and potassium) not used by the crop."