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TENTATIVE WASTE DISCHARGE REQUIREMENTS ORDER FOR POM WONDERFUL, LLC, WHOLE FRUIT AND JUICE EXTRACTION PLANT, FRESNO COUNTY

This letter transmits my comments on the subject Tentative Order, which was prepared by staff in the Central Valley Water Board's Fresno Office. I am a resident of Fresno County and a California registered civil engineer with expertise in evaluating the effects to soil and groundwater from discharges of food processing and winery wastewater to land for treatment and disposal. I am also personally familiar with this discharge operation from my years working as a Senior Water Resource Control Engineer in the Central Valley Water Board's Fresno Office.

This discharge operation, like many Central Valley food processing wastewater discharge operations, includes screening to remove excess solids from the waste stream, hauling of solids off site for use as cattle feed, application of nitrogen at agronomic rates, and groundwater monitoring to monitor the impact of the discharge on groundwater. It also features treatment and control measures that exceed those implemented by most Central Valley food processing dischargers, such as aeration and facultative ponds to reduce wastewater BOD concentrations, as well as treatment and storage ponds double lined with HPDE with a leak detection and recovery system between the two layers. These treatment and control measures, in addition to the other measures described in the Tentative Order, raise the bar for other Central Valley food processing dischargers, and provides evidence that "best practicable treatment and control" for food processing wastewater discharges includes treatment to reduce wastewater BOD to levels comparable to secondary treated municipal wastewater and waste containment requirements approaching Title 27 prescriptive standards.

Finding 33.a describes one salt management requirement established by the Tulare Lake Basin Plan until a salt drain is available: "The incremental increase in salts from use and treatment must be controlled to the extent possible. The maximum electrical conductivity (EC) in the discharge shall not exceed the EC of the source water plus 500 umhos/cm. When the source water is from more than one source, the EC shall be a weighted average of all sources."

Finding 34 describes an exemption from the incremental EC limit for Tulare Lake Basin food processing dischargers and cites average discharge TDS and FDS concentrations as evidence that the discharge meets the incremental EC limit exemption: "The Basin Plan allows an exception to the EC limit of source water plus 500 umhos/cm where the discharge exhibits a disproportionate increase in EC over the EC of source water due to unavoidable concentrations of organic dissolved solids from the raw food product, provided water quality objectives are met. With an average TDS concentration of 492 mg/L and an average FDS concentration of 261 mg/L, the discharge meets the incremental EC limit exemption."

Finding 9 states the average effluent EC is 609 umhos/cm and Finding 18 states the plant's source water EC is 130 umhos/cm. Therefore, the discharge EC is compliant with the Basin Plan's incremental EC limit. Since the discharger treats the plant's industrial wastewater to reduce BOD to levels approaching secondary treated municipal wastewater, the discharge no longer contains the "unavoidable concentrations of organic dissolved solids from the raw food product" that supports granting the incremental EC limit exemption and, because of this, the Central Valley Water Board should not grant this discharge an exemption from the incremental EC limit. The Tentative Order contains information indicating that area groundwater is of exceptional mineral quality. The Central Valley Water Board should require the discharger to comply with the Basin Plan's incremental EC limit to protect this high quality groundwater. **Recommendation 2: Revise Finding 34 to describe why the Basin Plan's incremental EC limit exemption does not apply to this discharge and revise Effluent Limitation C.1 to establish the monthly average effluent limit for EC to source water plus 500 umhos/cm.**

The drying of sludge in the empty storage pond (described in Finding 11) has the potential to create nuisance odors. **Recommendation 3: Revise Solids Disposal Specification E.1 to require the discharger to implement appropriate treatment or control measures for precluding the development of odor nuisance conditions during sludge drying operations.**

Finding 53 concerns the discharge's threat to water quality and complexity for annual fee purposes. Staff has correctly identified the discharge's threat to water quality as "2" and the discharge's complexity as "A". Waste discharge requirements orders for food processing wastewater discharges prepared by staff in the Region's other two offices and adopted recently by the Central Valley Water Board have assigned discharges a complexity of "B" even when the orders require groundwater monitoring. I commend the Fresno office staff for correctly applying the "A" level complexity designation for discharges with groundwater monitoring requirements.

I offer these recommendations in the hope that staff will revise the Tentative Order accordingly, or provide justification why staff believes the recommended changes are not warranted.

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