



August 10, 2012

W. Dale Harvey, RCE
Senior Water Resource Control Engineer
CA Regional Water Quality Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706-2020

**RE: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS
SUNNYGEM, LLC, SANDRIDGE PARTNERS, LP AND MCCARTHY FAMILY FARMS, INC.
SPICER CITY JUICE PROCESSING FACILITY, KERN COUNTY**

Dear Mr. Harvey,

SunnyGem, LLC has received the *Notice of Intent to Certify a Mitigated Negative Declaration and Adopt Tentative Waste Discharge Requirements* (WDRs) for the subject facility and proposes the following revisions to the Tentative WDRs:

Page 1, Statement of Fact 1

Please change the location from "the northwest corner of the northwest corner of Section 19, T16S, R25E, MDB&M" to "the southwest corner of the southeast corner of Section 9, T28S, R22E, MDB&M."

Page 11, "B. Effluent Limitations"

Please change limitation 1 from "The discharge shall not have a pH less than 6.5 or greater than 8.5" to "The discharge shall not have a pH less than 4.5 or greater than 9.0."

This change is requested because the acidic nature of the wastewater will complement the highly alkaline soils in the Reuse Areas and substantially reduce the current practice of applying acidifying minerals to neutralize the alkaline soils. Requiring SunnyGem to chemically neutralize the acidic wastewater prior to discharge will add to the fixed dissolved salt concentration in the wastewater and increase salt loading.

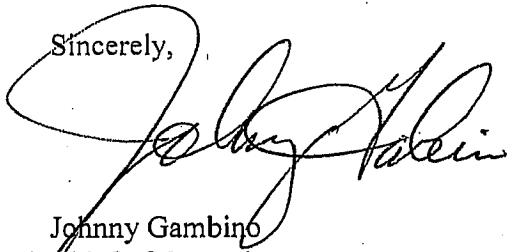
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SunnyGem is aware that excessive soil acidity can be harmful to crops and mobilize certain metals that could potentially degrade groundwater. While soil acidity in this area is not a recognized concern, the rate and depth of mobilized cations in acidic soil would be limited due to continual re-adsorption by a redundant succession of clay and organic matter as they move toward downward toward soil with near neutral pH.

Redundant chemical treatment to neutralize wastewater has been acknowledged by the Board with the adoption of WDRs for other food processors that allow a pH range of 4.5 to 9, e.g. WDR Order R5-2009-005. SunnyGem requests similar consideration.

If you have any questions regarding these comments, please do not hesitate to call Mrs. Kathy Parker, Insight Environmental Consultants, at (661) 282-2200 or myself at (661) 758-0491.

Sincerely,

A handwritten signature in black ink, appearing to read "Johnny Gambino". The signature is written in a cursive style with a large, looping initial "J".

Johnny Gambino
Chief of Operations

cc: Sandridge Partners, LP
McCarthy Family Farms, Inc.
Insight Environmental Consultants, Inc.