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May 1, 2014 Reference No. 076234-04

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

Dear Mr. Harvey:

Re: Comment Letter for Tentative Waste Discharge Requirements
Baker Commodities Inc., Kerman Rendering Plant, Order No. R5-2014-XXXX,
Fresno County (WDID 5D102015001, RM 384178)

This comment letter is being submitted on behalf of Baker Commodities, Inc., Kerman Rendering Plant (Baker) by Conestoga-Rovers & Associates, Inc. (CRA) in response to the Tentative Waste Discharge Requirements (WDR) Order R5-2014-XXXX (Order) dated April 1, 2014 from the California Regional Water Quality Control Board (Board).

Baker would like the following comments taken into consideration prior to adoption of the tentative WDR for the Kerman facility. For ease of reference, the Water Board's WDR item is presented first (in italics) followed by the comment.

1. *Finding No. 47: Provision G.7 requires that the Discharger install sufficient monitoring wells upgradient and downgradient of the lined ponds to monitor groundwater degradation from potential seepage.*

Comment #1:

Baker installed six monitoring wells in April 2012. Two of these newly installed monitoring wells (MW-8 and MW-9) were positioned directly downgradient from the lined lagoons to monitor potential degradation due to seepage. Monitoring Well 1, MW-1, represents the upgradient water quality for the facility as well as the lined lagoons. As such, it is recommended that this item be removed from the WDR requirements since this requirement has already been met.

2. *Finding No. 49.c: Baker's supply water EC is about 200 umhos/cm, which results in a discharge limit of no more than about 700 umhos/com. Baker is required to meet this*

limit, which is below the recommended secondary MCL for EC of 900 umhos/cm and is less than underlying groundwater EC upgradient of discharge areas.

Comment #2:

Baker's source well, FW-3, is installed to a depth of 580 feet below ground surface and does not represent the water quality of the upper aquifer. The water quality in FW-3 represents the water quality of the deeper aquifer and should not be used as the defining source well. Instead, it is recommended that the water quality from the upper aquifer (i.e. upgradient monitoring wells and/or irrigation wells) be used to define the source water quality discharge limit for electrical conductivity (EC). This would equate to an EC value of 1,500 to 2,000 umhos/cm. It is not economically feasible or practical to reduce the effluent discharge limit for EC to a level of 900 umhos/cm.

3. *Finding No. 65 from the Administrative Draft: The Discharger is not required to obtain coverage under State Water Resources Control Board (State Water Board) Water Quality Order No. 97-03-DWQ National Pollutant Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities because all storm water runoff is retained onsite and does not discharge into a water of the United States*

Comment #3:

This finding was removed from the tentative Order and should be added back to the Order since all storm water runoff is retained onsite.

4. *Provision B.1: The 12-month rolling average EC of the discharge shall not exceed the 12-month flow weighted average EC of the source water plus 500 umhos/cm.*

Comment #4:

As stated in Comment #2 above, the source water should be defined as the water quality of the upper aquifer and not defined by the water quality of the deeper aquifer, FW-3.

5. *Provision G.7: By 5 December 2014, the Discharger shall provide a Groundwater Monitoring Well Installation Work Plan for describing a plan for installation of additional groundwater monitoring wells. The additional monitoring well locations, construction, and number of wells shall be chosen to provide sufficient information to assess groundwater conditions upgradient and downgradient of the lined wastewater ponds. The work plan shall include a time schedule for implementation of the work and collection of the first round of samples from each well (in accordance with MRP R5-2014-####), which shall be completed by no later than 5 June 2015*

Comment #5:

As stated in Comment #1 above, this provision should be removed since Baker installed two monitoring well, MW-8 and MW-9 directly downgradient from the lined lagoons in April 2012 and MW-1 is located in a position upgradient from the lined lagoons.

6. *Monitoring and Reporting Program, Pond Influent Monitoring, Quarterly General Minerals analyses*

Comment #6:

It is recommended that general minerals analyses be conducted annually, however if required to be analyzed quarterly, it is recommended that the trends be reviewed after one year and revisited for frequency dependent on trends.

7. *Monitoring and Reporting Program, Pond Effluent Monitoring, Monthly General Minerals analyses*

Comment #7:

It is recommended that general minerals analyses be conducted annually, however if required to be analyzed monthly, it is recommended that the trends be reviewed after one year and revisited for frequency dependent on trends.

8. *Monitoring and Reporting Program, Soils Monitoring, Frequency, Annually*

Comment #8:

It is recommended that soils monitoring be conducted as a one-time event as part of the Nutrient Management Plan development and not be required annually. When requirements under this Order are met, soils monitoring will be unnecessary and also the required sample depths will be difficult to obtain given the stratigraphy beneath the land application areas located at the facility.

9. *Monitoring and Reporting Program, Groundwater Monitoring, Frequency, Quarterly*

Comment #9:

Monitoring wells MW-1 through MW-3 have been sampled quarterly since 1996 and show relatively stable trends over the course of each year. Monitoring wells MW-4 through MW-9 have been sampled quarterly since April 2012 and also show these relatively stable trends. Since there is little variation in the quarterly trends, it is recommended that groundwater monitoring be conducted semi-annually.

10. *Reporting, A. All Quarterly Monitoring Reports, Supply Water Reporting: Results intended to represent Plant supply water as a whole shall be labeled as SPL-ALL. Results intended to represent irrigation supply water as a whole shall be labeled FW-ALL.*

Comment #10:

This naming convention is not consistent with the Monitoring Location Description listed on Page 2 of the Monitoring and Reporting Program. On Page 2, SPL-ALL and FW-ALL refers to the plant water supply wells and IW-ALL refers to irrigation water supply wells. To avoid confusion, this naming convention should be consistent throughout the Order.

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Please feel free to contact us if you have any additional questions and we would be happy to meet with you to discuss this further.

Regards,

CONESTOGA-ROVERS & ASSOCIATES

Michael Beerends

MB/lm/55

cc: Steve Dessauer (Baker Commodities)
Mat Dahmen (Baker Commodities)
Steve Popenoe (RWQCB)
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