



June 13, 2014

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

Re: Written Comment – Tentative Waste Discharge Requirements and Time Schedule Order for The Wine Group LLC – Franzia Sanger Winery – Fresno County

Mr. Harvey,

On behalf of The Wine Group, LLC (TWG), included herein are written comments in response to the Tentative Waste Discharge Requirements (TWDR) and Time Schedule Order (TSO) as prepared for the Franzia Sanger Winery (the Facility) and released for public comment on May 14, 2014. TWG would also like to express gratitude to the Central Valley Regional Water Quality Control Board (RWQCB) and to all Staff members for their cooperation and communication through the permitting process.

The TWDR as currently written is predominantly manageable for TWG, however there is concern with the Biochemical Oxygen Demand (BOD) cycle loading rate of 100 pounds per acre per day (lbs/acre/day) being applied to the new 53-acre land application area (LAA). TWG acknowledges the need for this loading rate to be applied to the existing 150-acre LAA which has historically received the entirety of the land applied winery waste water, however, the new 53-acre LAA has not received wastewater to date to the knowledge of the Facility.

- As referenced in TWDR Land Application Area Practices Finding 14. (page 4), the United States Environmental Protection Agency's (USEPA) guidance document *Pollution Abatement in the Fruit and Vegetable Industry* cites BOD loading rates associated with crop irrigation to prevent nuisance conditions. These loading rates, as published in the document, range from 36 to 600 lbs/acre/day depending on irrigation practice and proper management thereof. The document additionally indicates that loading rates can be even higher under certain conditions. Land Application Area Practices Finding 15. (page 4) further references the California League of Food Processors (CLFP) *Manual of Good Practice for Land Application for Food Processing/Rinse Water* (the Manual) and its proposed risk categories associated with particular BOD loading rates. As proposed within the Manual, a

The Wine Group, LLC

Franzia Sanger Winery – 2916 South Reed Avenue – Sanger, Fresno County, California 93657

Risk Category rating of 3 (loading of greater than 100 lbs/acre/day and a depth to groundwater of greater than 2 feet) requires detailed planning and good operation with good distribution to prevent unreasonable degradation. TWG would like to point out that the new 53-acre LAA (which has not historically received wastewater loading) is currently planted with wine grape vines and as such, provides for the application of more controlled, even, and consistent wastewater distribution through flood irrigation via furrows between the vine rows. This will allow the Facility to maintain detailed planning and good operation with good distribution of the applied wastewater for this LAA. In addition, this also will allow for a rotation through the 53 acres of a second crop to be planted and harvested from between the rows.

- The Wine Institute conducted, with support of outside contractors, field application analysis of BOD removal rates for winery wastewater (both stillage and non-stillage waste streams) in 2002 and 2003 (study also referenced in the February 18, 2014 Tentative Waste Discharge Requirements Comments letter supplied to the RWQCB on behalf of the O'Neill Beverages Company – Reedley Winery). In this study, it was determined that BOD loadings of up to 734 lbs/acre/day from a non-stillage winery waste stream could be applied to lands located within California's Central Valley with the successful removal of 80 to nearly 100 percent of the concentration of applied BOD.

For these the reasons described herein, and to allow for the maximum beneficial use of all lands included in the Facilities LAAs, including maintaining compliance with the Order and maintaining sufficient flexibility and capacity to allow for the widely varying flows encountered within a winery setting during and through the harvest and non-harvest seasons, TWG requests that the BOD cycle loading rate specific to the new 53-acre LAA be set at 150 lbs/acre/day.

TWG additionally requests that the requirement to submit a map identifying the locations of the soil profile monitoring locations (page 4 of the Monitoring and Reporting Program) be modified to be required 30 days prior to the first sampling (which is required in October) instead of 60 days prior as it is currently stated. This adjustment is requested to allow adequate time to select sampling locations and prepare a submittal between the adoption of the Order and the required submittal date.

On behalf of TWG and the Facility, I would like to thank the RWQCB for allowing for the submittal of and consideration of the comments included herein. Should the RWQCB require clarification or additional information pertaining to these comments, please contact me at kyle.schmidt@thewinegroup.com / o: (209) 599-0451 / c: (225) 326-3228.

Thank you for your consideration in this matter,



Kyle Schmidt
Director of Environmental Services
The Wine Group
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cc: Denise Soria, RWQCB
California RWQCB, Rancho Cordova, CA