



ConAgra Foods
16429 W Kamm Ave
Helm Ca, 93705
559-934-3317

WDH
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JUN 25 2014

**RWQCB-CVR
FRESNO, CALIF.**

June 23, 2014

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

RE: ConAgra Foods, Inc., Helm, CA, Comments on the Tentative Waste Discharge Requirements

Dear Mr. Harvey:

Please consider the attached comments in response to the Tentative Waste Discharge Requirements (WDRs) that were issued on May 23, 2014. We certainly appreciate your efforts made to depict the existing conditions of our facility; and we await your consideration to ease a few financial impacts of the new proposed WDR requirements on this seasonal operation.

If there are any questions regarding these comments, please call us at (559) 934-3346.

Sincerely,

Earl Kelso
Plant Manager


Attachments

cc: Steve Maddox, Maddox Farms, LLC

SUGGESTED TEXT CHANGES TO THE 2014 CONAGRA HELM TENTATIVE WDRs -

Changed text are in italics.

Page 2, Finding 7: Facility Size

Current Text: "The Facility is on 25 acres and"

Suggested Text: "The Facility is on *48.98* acres and"

Rationale - The Facility boundary referenced on the WDR Attachment B is inaccurate. The following APN areas should be used for the legal description of the facility. There are two Hunt Wesson parcels: the first parcel is 29.03 acres (APN 040-140-32) and the second parcel is east of the first one (040-140-34, 19.94 acres), for a total of 48.98 acres.

Referenced APN Map Parcels 1 and 2 for the ConAgra Helm Facility



Page 17, E. Groundwater Limitations; Bullet b.

Current Text: "b. For constituents identified in Title 22, the MCLs quantified therein

Suggested Text: "b. For the constituents *referenced in this WDR/MRP* and identified in Title 22, the MCLs quantified therein."

Rationale - Clarification needed as the current text implies all the Title 22 parameters.

Page 19, Provision 13: Groundwater Evaluation and Appropriate Monitoring Network

Current Text: "...recommend an appropriate ground water monitoring network."

Suggested Text: "...recommend an appropriate ground water monitoring network. *Existing off-site monitoring wells, irrigation and domestic water wells may be considered if criteria are met (i.e. reasonable horizontal and vertical placement of well intake intervals reflect uppermost first encountered ground water in the area).*

Rationale – The current text does not allow flexibility of using irrigation/domestic or monitoring wells on or nearby the Facility and Land Application Area

SUGGESTED TEXT CHANGES TO THE CONAGRA HELM 2014 TENTATIVE MRPs

Page 2, Monitoring Point Name, Table:

Current Text: "EFF-01 – Location where a representative sample of the Facility wastewater can be obtained...."

Suggested Text: "EFF-01 – Location where a representative *water quality* sample of the Facility wastewater can be obtained....."

Current Text: "PND-01 – Location where a representative sample from the wastewater retention pond can be obtained."

Suggested Text: "PND-01 – Location where a representative *water quality* sample from the wastewater retention pond can be obtained *on a weekly basis as referenced below and when wastewater exists in the pond.*"

Page 2, Effluent Monitoring Table: Table Footnote 1

Current Text: "During the non-seasonal discharge period (November through June), samples collected"

Suggested Text: "During the non-seasonal discharge period (November through June), samples collected, *if wastewater discharge occurs....*" –

Page 3, Groundwater Monitoring, first paragraph

Current Text: "Depending on the hydraulic conductivity of the geologic setting, the volume removed during purging is typically from 3 to 5 volumes of the standing water within the well casing and screen, or additionally the filter pack pore volume."

Suggested Text: "Depending on the hydraulic conductivity of the geologic setting, the volume removed during purging is typically from 3 to 5 volumes of the standing water within the well casing and screen, or additionally the filter pack pore volume. *This is considered a macropurge sampling technique. When the water level response during pumping is minimal, stabilization can be monitored based on removal of the dedicated pump tubing volume (low flow sampling technique).*"

Rationale – This current text constrains the sampling technique to macropurge and eliminates the potential use of low flow or passive sampling techniques which significantly lower samp