

September 07, 2021

Kristen Gomes  
California Regional Water Quality Control Board, Central Valley Region  
1685 E Street  
Fresno, CA 93706

**RE: Comments on Tentative Waste Discharge Requirements for O'Neill Vintners Distillers Reedley Winery Surface Class II Impoundment Fresno County, WDID 5C10NC00014**

Dear Ms. Gomes:

Thank you for providing us the opportunity to comment on the Tentative Waste Discharge Requirements (**WDRs**) and Monitoring and Reporting Program (**MRP**) for the O'Neill Vintners and Distillers. We have reviewed the WDRs and MRP and are requesting the following changes:

**Tentative WDRs**  
**Page 4. No. 21:**

*"Surface water from the Facility drains to Kings River."*

The facility and all associated land application areas are graded so that all stormwater is contained onsite.

**Page 14. No. 17:**

*"The Discharger needs to submit an updated Operations Plan by 28 February 2022."*

Modifications to the operations of the Surface Impoundment are currently being considered. These changes may alter or negate an updated Operation Plan submitted by 28 February 2022. O'Neill Distillers and Vintners requests a six-month extension to this due date.

**Page 15. No. 1:**

*"The Discharger shall submit an updated Preliminary Closure Plan by 28 February 2022."*

Modifications to the operations of the Surface Impoundment are currently being considered. These changes also may alter or negate an updated any Preliminary Closure Plan submitted by 28 February 2022. O'Neill Distillers and Vintners requests a six-month extension to this due date.

**Page 17. No. 2:**

*“The Discharger shall submit an updated Sampling Collection and Analysis Plan (SCAP) and Water Quality Protection Standard (WQPS) by 28 February 2022”*

This deadline conflicts with the 4<sup>th</sup> Quarter and Annual Groundwater Quality Progress Report deadline that O'Neill Distillers and Vintners must complete and submit. To prioritize resources for these important reports, it is requested that a six-month extension to this due date be given.

**Tentative MRP**

**Page 7. No. 3:**

*“In order to determine if the groundwater in the area is influenced seasonally by the Kings River, elevation monitoring of the Kings River is required to be monitored monthly and reported quarterly.”*

We request the removal of this monitoring requirement because there does not appear to be a suitable gauging station in the vicinity of the groundwater monitoring area. Historical and future groundwater monitoring data provides sufficient information to evaluate seasonal influence on groundwater. Other publicly available data on this item for the Kings River can be referenced on an as-needed basis.

**Page 3. No. 1b:**

*“Groundwater samples shall be collected from each well and analyzed for Monitoring Parameters listed in Table 2 (Physical Parameters) and Table 3”*

Extensive historical data is available from many monitoring wells in proximity of the SI, including wells SI-4 and SI-5, per the requirements of the existing SI WDR Order 5-01-141 and WDR Order R5-2014-0045. Wells SI-04 and SI-05 have been sampled and analyzed at least seven times since installation in 2019, and sampling will continue. Given the amount of historical data and to better align SI groundwater monitoring with the land application monitoring wells, we request changing the sampling frequency of the SI wells in Table 2 and Table 3 to quarterly. Monthly depth to water measurements will be taken monthly, as required by Table 4.

It is also requested that analysis of copper and Methylene Blue Active Substances (MBAS) be removed from the required constituent list. Historical data from the SI wells shows typically low copper (<0.1 mg/L) and MBAS concentrations (<0.1 mg/L). Moreover, monitoring of SI water quality indicates that that water is not a significant source of copper nor MBAS.

**Page 11. No. 4:**

*“Wastewater influent samples shall be collected monthly and analyzed for the constituents in Tables 2 and 3.”*

The monthly analysis frequency of the parameters listed within Table 2 and Table 3 is more than what is necessary to provide adequate monitoring SI water. It is requested that the frequency of analysis for the parameters listed in Table 2 and Table 3 be reduced to a quarterly schedule. O'Neill will monitor statistical trends of SI water quality. If substantial and unexpected increases in constituent concentrations occur, additional sampling, analysis, and review will occur to better understand the nature of the changes in water quality.

**Page 11. No. 2:**

*“The fluid levels shall be estimated to the nearest one inch and recorded daily from calibrated gauges installed in the surface impoundment.”*

It is requested that the daily estimation and recording of fluid depth be reduced to once every two weeks due to the very slow fill rate of the surface impoundment's 10-acre area.

**Page 11. No. 3:**

*“All Visual portions of the synthetic liner and surface impoundment features shall be inspected weekly...”*

It is requested that the weekly visual inspections be reduced to a frequency of once every two weeks. The surface impoundment is located within a fenced and secured area of the facility. A visual inspection performed every two weeks would provide sufficient monitoring for the impoundment under these secure conditions and better align monitoring frequencies.

**Page 17. No. 4:**

*“Dissolved oxygen concentrations in the upper foot of wastewater must be measured weekly.”*

It is requested that the frequency of the measurement of the dissolved oxygen be reduced once every two weeks to coincide with other monitoring frequencies.

We appreciate the opportunity to provide input on the tentative WDRs and MRP. If you have any questions regarding our suggestions or wish to discuss them further, please contact us at (559) 636-1166.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Castro", written over a horizontal line.

Phil Castro, O'Neill

Provost & Pritchard:

Shawn Vaughn, PG

Jon Vander Schuur, QSD/QSP, CPESC

D. Ryan Dodd, CPSS, CCA