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Subject: Lemoore/Leprino River Ranch, Tentative WDRs Comments
Date: Friday, December 15, 2023 4:57:27 PM

EXTERNAL:

The current order (WDR R5-2019-0008) prescribes effluent limitations for BOD and TSS each of 40 mg/L monthly average and 80 mg/L daily maximum for the combined discharge to the Land Application Areas (LAAs). Without a BOD effluent limit for Leprino's discharge, or continuation of the current order's BOD limits of 40/80 for the combined (City and Leprino) discharge to LAAs, there is no incentive for Leprino to ensure that its effluent will not cause the BOD of the combined effluent to exceed the value of 220 mg/L cited in Table 10, Finding 79.

The tentative order's BOD loading limit of 100 lbs/acre/day is more applicable to land discharges of minimally-treated food processing wastewater. Leprino's wastewater treatment facility is capable of achieving BOD loading limits for the combined discharge of less than 10 lbs/acre/day (Finding 25, Table 4). The tentative order does not provide sufficient technical and regulatory justification for its overly generous BOD loading limit of 100 lbs/acre/day. To truly demonstrate Leprino's best efforts, as cited in Finding 78, the BOD loading limit should not exceed 20 lbs/acre/day.

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