



March 27, 2018

Scott Hatton
California Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

**SUBJECT: Comments to Tentative Amending Waste Discharge Requirements Order
R5-2014-0082: Bidart Bros. Bakersfield Potato Shed, Kern County**

Dear Mr. Hatton:

Bidart Bros. (Bidart) and Cascade Earth Sciences (CES) have received the tentative Order Amending Waste Discharge Requirements (WDRs), Dated March 12, 2018, for the Bakersfield Potato Shed. The Notice to the tentative WDRs provides the opportunity for all concerned persons and agencies to comment on the tentative WDRs. Bidart and CES have reviewed the tentative WDRs. On behalf of Bidart, CES is submitting the following comments to the Central Valley Regional Water Quality Control Board for consideration.

Monitoring and Reporting Program

Land Application Area Monitoring LAA-001 (Non-Processing Season), Page 7

Comment: Irrigation volume is required to be metered, with flow recorded monthly, however, the units in which the volume is required to be recorded is “gpd” (gallons per day).

We request that the units be changed from “gpd” to “gallons” to match the monthly metering frequency.

Comment: Nitrogen loading rate is required to be calculated monthly “*From Irrigation Water*”. During the Non-Processing Season only supplemental irrigation occurs. There are no current or proposed requirements for the analysis of total nitrogen for supplemental irrigation, therefore nitrogen loading from supplemental irrigation water(s) cannot be calculated.

We request that the calculation for “*Monthly Nitrogen Loading Rates From Irrigation Water*” be removed.



Footnote 3, Page 7

Nitrogen and salt loading shall be calculated using the applied volume of process wash water and irrigation water, applied acreage, and the average concentrations of the two samples of total nitrogen and FDS collected during the current potato processing season from monitoring location EFF-001”

Comment: Process wash water is not irrigated during the Non-Processing Season. The samples collected from EFF-001 are a representation of the quality of the process wash water, not supplemental irrigation. There is no current or proposed requirement for the analysis of FDS or total nitrogen in supplemental irrigation water, currently Beardsley Canal water. Water from the Beardsley Canal is used as a “Source Water” for the Bakersfield Potato Shed and for supplemental irrigation during the Non-Processing Season.

We request that Footnote “3” be removed since it is not relevant to the Non-Processing Season.

Thank you for providing us with the opportunity to review and comment on the tentative WDRs for the Bakersfield Potato Shed. We ask that you fully consider our comments prior to issuance of the Order. Please contact me at (559) 732-3665, or Leonard Bidart at (661) 410-1400 ext. 12, if you have questions or need additional information.

Sincerely,
CASCADE EARTH SCIENCES

A handwritten signature in blue ink that reads "Courtney Mancor for". The signature is written in a cursive style.

Michael. S. Sowers, CPSS, CCA-WR
Managing Soil Scientist

MSS/cem

cc: Leonard Bidart, Jake Burns – Bidart Bros
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