

TENTATIVE
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

WASTE DISCHARGE REQUIREMENTS ORDER R5-2021-XXXX
FOR
GLORIANN FARMS AND FC TRACY HOLDINGS, LLC/FIVE CROWNS
TRACY HOLDINGS FACILITY
SAN JOAQUIN COUNTY

INFORMATION SHEET

BACKGROUND

GloriAnn Farms and FC Tracy Holdings, LLC/Five Crowns (referred to collectively as Discharger) owns and operates the Tracy Holdings Facility (Facility), located in Lodi in San Joaquin County. The Facility was constructed in 2020 and will begin operating in 2021. The Facility will wash and package approximately 26,000 tons/year of fresh corn, and watermelons will be dry brushed and packaged seasonally during the processing season, which is generally May through October. Watermelons will be stored in cold storage, along with various other commodities during the processing season. During the corn and watermelon off-seasons, other commodities may be packed and stored, and equipment cleaned, which will produce wastewater. Finished products are trucked offsite for commercial sale

The Discharger submitted a Report of Waste Discharge (RWD), dated 30 April 2019, which described Facility operations and the land application of wastewater. Additional information was submitted on 18 November 2019, and 2 December 2020.

WASTEWATER GENERATION AND DISPOSAL

The Facility consists of a corn processing plant, cold storage facilities, land application areas, and a wastewater treatment pond.

Wastewater will be generated from corn processing, equipment cleaning, and defrost condensate. Wastewater, including storm water, will be collected in drains which discharge to a sump. The sump will discharge to a lined and aerated wastewater pond for treatment and storage. The wastewater will be used to irrigate 29.1 acres of land application areas cropped with almond trees. The Facility is projected to generate up to 6 million gallons of wastewater per month. All solids will be captured and hauled offsite.

GROUNDWATER CONSIDERATIONS

Three groundwater monitoring wells (MW-1 to MW-3) were installed in August 2020 to determine pre-discharge groundwater conditions. Groundwater was determined to be of poor quality with respect to metals (iron and manganese) and salinity, which includes TDS, EC, sulfate, sodium, and chloride. Concentrations of these constituents exceed the concentrations protective of beneficial use. Generally, concentrations are higher in

MW-1 and MW-2 when compared to MW-3. It appears that groundwater in the vicinity of MW-3 may be influenced from the better-quality water recharging groundwater from the BCID canal, located near the well.

ANTIDEGRADATION

Discharges from the Tracy Holdings Facility have not yet occurred. As a comparable operation, the Discharger owns and operates a similar corn processing facility in San Joaquin County (GloriAnn Farms). Effluent data from GloriAnn Farms were used to evaluate potential conditions at the Tracy Holdings Facility because both facilities will use the same cleaning chemicals and will have the same operating processes.

Flow-weighted average concentrations reported in the wastewater from GloriAnn are less than the concentrations detected in groundwater at the Tracy Holdings Facility. It does not appear that discharges from the Tracy Holdings Facility will impact groundwater beyond existing conditions. This Order sets groundwater and effluent limitations for the continued protection of groundwater.

DISCHARGE PROHIBITIONS, EFFLUENT LIMITATIONS, DISCHARGE SPECIFICATIONS, AND PROVISIONS

The Order limits the maximum monthly average and annual flow to 6.3 MG/month and 49 million gallons, respectively. The Order sets an FDS annual average effluent limit concentration of 700 mg/L and a cycle average BOD loading limit of 100 lbs/ac/day. In addition, this Order requires wastewater and supplemental irrigation water be applied to the LAAs at agronomic rates.

This Order requires the Discharger to submit the following reports:

- *Groundwater Limitations Compliance Assessment Plan*
- *Operations and Maintenance Plan*
- *Salt and Nutrient Management Plan*

MONITORING REQUIREMENTS

Section 13267 of the California Water Code authorizes the Central Valley Water Board to require monitoring and technical reports as necessary to investigate the impact of waste discharges on waters of the State. Water Code Section 13268 authorizes assessment of civil administrative liability where appropriate. The Order includes effluent, LAA, solids, groundwater, and water supply monitoring requirements. This monitoring is necessary to characterize the discharge and evaluate compliance with the requirements and specifications in the Order.

SALT AND NITRATE CONTROL PROGRAMS REGULATORY CONSIDERATIONS

As part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative, the Central Valley Water Board adopted Basin Plan amendments (Resolution R5-2018-0034) incorporating new programs for addressing ongoing salt and nitrate accumulation in the waters and soils of the Central Valley at its 31 May 2018

Board Meeting. On 16 October 2019, the State Water Resources Control Board adopted Resolution No. 2019-0057 conditionally approving the Central Valley Water Board Basin Plan amendments and directing the Central Valley Water Board to make targeted revisions to the Basin Plan amendments within one year from the approval of the Basin Plan amendments by the Office of Administrative Law. The Office of Administrative Law (OAL) approved the Basin Plan amendments on 15 January 2020. (OAL Matter No. 2019-1203-03).

Pursuant to the Basin Plan amendments, dischargers will receive a Notice to Comply with instructions and obligations for the Salt Control Program within one year of the effective date of the amendments (17 January 2020). Upon receipt of the Notice to Comply, the Discharger will have no more than six months to inform the Central Valley Water Board of their choice between Option 1 (Conservative Option for Salt Permitting) or Option 2 (Alternative Option for Salt Permitting). The level of participation required of dischargers whose discharges do not meet stringent salinity requirements will vary based on factors such as the amount of salinity in the discharge, local conditions, and type of discharge. For the Nitrate Control Program, the Facility falls within Groundwater Sub-Basin 5-22.07 (San Joaquin Valley Delta Mendota Basin), a priority 2 Basin. Notices to Comply for Priority 2 Basins will be issued within two to four years after the effective date of the Nitrate Control Program. The CV-SALTS initiative will result in regulatory changes that will be implemented through conditional prohibitions and modifications to many WDRs regionwide, including the WDRs that regulate discharges from the Facility. [More information regarding the CV-SALTS regulatory planning process](#) can be found at the following link:
https://www.waterboards.ca.gov/centralvalley/water_issues/salinity/

REOPENER

The conditions of discharge in the Order were developed based on currently available technical information and applicable water quality laws, regulations, policies, and plans, and are intended to assure conformance with them. The Order sets limitations based on the information provided thus far. If applicable laws and regulations change, or once new information is obtained that will change the overall discharge and its potential to impact groundwater, it may be appropriate to reopen the Order.

LEGAL EFFECT OF RESCISSION OF PRIOR WDRS OR ORDERS ON EXISTING VIOLATIONS

The Central Valley Water Board's rescission of prior waste discharge requirements and/or monitoring and reporting orders does not extinguish any violations that may have occurred during the time those waste discharge requirements or orders were in effect. The Central Valley Water Board reserves the right to take enforcement actions to address violations of prior prohibitions, limitations, specifications, requirements, or provisions of rescinded waste discharge requirements or orders as allowed by law.