

Comments from Peter Rabbit Farms regarding draft Order R7-2019-0032 May 15, 2019  
Items included in the Draft are shown in **bold**.

ORDER R7-2019-0032 WASTE DISCHARGE REQUIREMENTS

**2. The Discharger discharges a maximum of 50,000 gallons per day (gpd) of wash water into agricultural fields adjacent to the site.**

The above statement is generally correct, although we do often discharge less. The statement that we discharge is contradicted later in the Draft. We request that the number be increased to 100,000 gpd to allow for reasonable variance in quantity, given the restrictions in section B 1, below.

**9. ...discharge to the Reclamation Area has not occurred since 2005 because of reduced water use in the washing operation.**

It is true that water use has been reduced, but the reduced amount of water produces the discharge of 50,000 gpd as stated earlier. Discharge to the Reclamation Area does occur presently.

**12. The Discharger's Self-Monitoring Reports (SMRs) from 2013 to 2018 reported the following average characteristics of the discharged wastewater:**

Because we are using less water, we have less dilution and more buildup from evaporation. SMRs from recent years are more representative of current operating conditions. For 2018, TDS was reported 1,804 which is realistic for current operating conditions. BOD was 129 in 2017 and 112.2 in 2018. Total Suspended Solids was 2,660 in 2018. Please increase TDS and other constituents to be consistent with more recently reported numbers.

**19. The water source for the Facility is well water from the onsite, private wells with a total dissolved solids (TDS) concentration that averages about 250 milligrams per Liter (mg/L).**

The 250 number is in the current Order. We do not know the origin of that number, but a lab report from 2011 shows TDS for the well = 757 mg/L. We have a deeper well on the property that we sometimes use, and its TDS in 2011 was 148 mg/L.

**A. Discharge Prohibitions. 5. Application of treated wastewater to the Reclamation Area in excess of agronomic rates is prohibited.**

Between crops, it is typical to use water to leech the fields. This activity should be permitted.

**B. Effluent Limitations 1. The 30-day average daily dry weather discharge into the Reclamation Area shall not exceed 50,000 gpd.**

Please increase from 50,000 to 100,000 gpd to allow for reasonable variance in quantity. 50,000 is typical, is not intended to be a cap or maximum allowed quantity.

**E. Reclamation Specifications 1. Currently, there is no discharge to the Reclamation Area. If the Discharger intends to begin irrigation using wastewater from the settling/recirculation pond, then a new Report of Waste Discharge shall be submitted to the Colorado River Basin Water Board prior to initiation of the discharge.**

As noted above, we do currently discharge to the Reclamation Area. Please remove this section.

**E. Reclamation Specifications 2. Hydraulic loading of wastewater shall be at reasonable agronomic rates designed to minimize the percolation of wastewater and irrigation water below the root zone (i.e. deep percolation), considering the crop, soil, climate, and irrigation management system.**

As noted earlier, between crops, it is typical to use water to leech fields. This activity should be permitted.

MONITORING AND REPORTING PROGRAM R7-2019-0032

**B. Effluent Monitoring**

Currently sampling frequency is semi-annually, new requirement is quarterly. Please change to semi-annually.

<b>Flow</b>	<b>GPD</b>	<b>Daily (Reported Quarterly)</b>
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We do not meter flow at discharge point. 50,000 gpd is an estimate based on monthly meter readings of source well water production.

**C. Sediment Monitoring 1 Pesticide (EPA Method 608)**

This is a new requirement, please explain justification or remove item.

**D. Operation and Maintenance 1. Activity**

**... calibration of flow meters ... Operation and Maintenance Manual, ...operator certification status update including number of staff and grade certification.**

We do not have flow meters, an operation and maintenance manual or operator certifications. We are a carrot farm, and we are washing carrots with water. We are not a wastewater treatment plant. Please remove these references.

**E. Reporting 1 ...quarterly Self-Monitoring Reports (SMRs).**

Please change to semi-annual, as noted above.

**E. Reporting 4 The results of any analysis taken more frequently than required at the locations specified in this MRP shall be reported to the Colorado River Basin Water Board.**

This requirement is not necessary, please remove it.