

Response to Comments
Comment Deadline: June 12, 2019

Tentative Waste Discharge Requirements (WDRs) Order R7-2019-0032 for Peter Rabbit Farms, Owner/Operator, Carrot Washing Wastewater Disposal Facilities, Coachella, Riverside County

Comment Letter #	Date	Commenter	Affiliation
Email 1	May 15, 2019	John Powell, Jr.	President/CEO, Peter Rabbit Farms

Changes proposed in response to comments made on 05/15/19 are incorporated into the tentative WDRs as revised on 05/31/19, unless otherwise noted.

Comment #	Location in the WDRs	Comment	Response
1	Page 1, Finding 2	<p>“The Discharger discharges a maximum of 50,000 gallons per day (gpd) of wash water into agricultural fields adjacent to the site.”</p> <p>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.</p>	<p>In response to this comment, staff proposes to change the language in Finding 2 as follows:</p> <p>“The Discharger discharges a maximum of <u>100,000</u> gallons per day...”</p> <p>In the current permit, Order R7-2004-0005, Finding 3 states that the maximum daily flow of 460,000 gpd was discharged at the carrot washing wastewater disposal facilities. The Discharger has implemented water conservation measures at the Facilities over the past 15 years that have significantly reduced wastewater production. It was the Regional Water Board’s intent to add an effluent limit for the 30-day average daily dry weather discharge into the Reclamation Area, though not to be overly restrictive.</p>
2	Page 2, Finding 9	<p>“...discharge to the Reclamation Area has not occurred since 2005 because of reduced water use in the washing operation.”</p> <p>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.</p>	<p>In response to this comment, staff proposes to delete the following sentence in Finding 9:</p> <p>“However, discharge to the Reclamation Area has not occurred since 2005 because of reduced water use in the washing operation.”</p>

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3	Page 2, Finding 12	<p>The Discharger’s Self-Monitoring Reports (SMRs) from 2013 to 2018 reported the following average characteristics of the discharged wastewater:</p> <p>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.</p>	<p>Comment noted. The table contains average data from the most recent 5-year period, which includes data reported from 2018. Staff does not propose any changes in response to this comment.</p>
4	Page 3, Finding 19	<p>“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).”</p> <p>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.</p>	<p>The 250 mg/L average was reported in a past Report of Waste Discharge (ROWD) submitted to the Regional Water Board. In response to this comment, staff proposes to add the following clarifying sentence to Finding 19:</p> <p>“Lab report data from 2011 shows that the TDS concentration in the shallower onsite well was 757 mg/L, and 148 mg/L in another deeper well that is sometimes used.”</p>
5	Page 6, Discharge Prohibitions section A.5	<p>“Application of treated wastewater to the Reclamation Area in excess of agronomic rates is prohibited.”</p> <p>Between crops, it is typical to use water to leech the fields. This activity should be permitted.</p>	<p>Staff agrees that leaching the fields with wastewater in the Reclamation Area to remove residual salts is permissible. For clarification, staff proposes to add the words “for irrigation” after “Application of treated wastewater” to the discharge prohibition found in Section A.5 as follows:</p> <p>“Application of treated wastewater <u>for irrigation</u> to the Reclamation Area in excess of agronomic rates is prohibited.”</p>

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6	Page 6, Effluent Limitation section B.1	<p>“The 30-day average daily dry weather discharge into the Reclamation Area shall not exceed 50,000 gpd.”</p> <p>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.</p>	<p>Please see Response to Comment 1. Staff proposes to change the effluent limitation as follows:</p> <p>“The 30-day average daily dry weather discharge into the Reclamation Area shall not exceed <u>100,000</u> gpd.”</p>
7	Page 7, Reclamation Specifications section E.1	<p>“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.”</p> <p>As noted above, we do currently discharge to the Reclamation Area. Please remove this section.</p>	<p>In response to this comment, staff proposes to delete Reclamation Specification Section E.1.</p>
8	Page 7, Reclamation Specification section E.2	<p>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.</p> <p>As noted earlier, between crops, it is typical to use water to leach fields. This activity should be permitted.</p>	<p>See Response to Comment 5. Staff proposes to revise Reclamation Specifications Section E.2 as follows:</p> <p>“Hydraulic loading of wastewater <u>for irrigation</u> 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. <u>Leaching of the Reclamation Area is permitted.</u>”</p>
9	Page 13, Effluent Monitoring section B.1	<p>Currently sampling frequency [for effluent monitoring] is semi-annually, new requirement is quarterly. Please change to semi-annually.</p>	<p>Because the discharge only occurs seasonally, staff determined that more monitoring data is needed from the Facility to adequately monitor any impacts to areal groundwater. Staff does not propose any changes in response to this comment.</p>

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10	Page 14, Effluent Monitoring section B.1	<p>“Flow GPD Daily (Reported Quarterly)”</p> <p>We do not meter flow at discharge point. 50,000 gpd is an estimate based on monthly meter readings of source well water production.</p>	<p>In response to this comment, staff proposes to revise the monitoring entry for flow as follows:</p> <p>“Flow GPD <u>Estimate</u> Quarterly”</p>
11	Page 14, Sediment Monitoring section C.1	<p>“C. Sediment Monitoring 1 Pesticide (EPA Method 608)”</p> <p>This is a new requirement, please explain justification or remove item.</p>	<p>Sediment in the settling pond is removed and reapplied to the Reclamation Area periodically, thus sediment monitoring is not needed. As such, staff proposes to delete Sediment Monitoring Section C.1.</p>
12	Page 14, Operation and Maintenance section D.1	<p>“... calibration of flow meters ... Operation and Maintenance Manual, ...operator certification status update including number of staff and grade certification. “</p> <p>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.</p>	<p>In response to this comment, staff proposes to delete the following language in Operation and Maintenance Section D.1:</p> <p>“...modifications and updates to the Operation and Maintenance Manual, and modifications and updates to the Discharger’s wastewater ordinance or rules and regulations. The Discharger shall also provide an operator certification status update including number of staff and grade certification.”</p>
13	Page 14, Reporting section E.1	<p>“...quarterly Self-Monitoring Reports (SMRs).”</p> <p>Please change to semi-annual, as noted above.</p>	<p>Please see Response to Comment 10.</p>
14	Page 15, Reporting section E.4	<p>“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.”</p> <p>This requirement is not necessary, please remove it.</p>	<p>This is a standard provision in the Regional Water Board’s Monitoring and Reporting Programs accompanying Waste Discharge Requirements. It originally comes from 40 C.F.R. section 122.41(l)(4)(ii) and is necessary under Water Code section 13267 for representative monitoring for the site. Staff does not propose any changes in response to this comment.</p>