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RWQCB-CVR
FRESNO, CALIF.

December 18, 2014

California Regional Water Quality Control Board
1685 E Street, Suite 100
Fresno California 93706

Attention: Mr. Jeffrey Pyle

RE: Tentative Waste Discharge Requirements Order For
Keenan Farms Inc., Pistachio Processing Plant, Kings County

This letter summarizes the comments during our December 09, 2014 meeting. The meeting addressed the Tentative Order R5-2015-XXXX for Keenan Farms, Pistachio Processing Facility.

The following findings and suggested revisions are for the Tentative Waste Discharge Requirements (WDR) and the Monitoring and Reporting Program (MRP) portion of the subject Tentative Order.

Tentative Waste Discharge Requirements, Provisions, No.6, Notes that the wastewater is directed to a small unlined sump.

Recommendation 1: The existing sump is a steel lined structure that supports a pump.

Tentative Waste Discharge Requirements, Section F. Provisions, No.13, The Compliance Schedule, Task C, Due Date, calls for the scheduled construction modifications to the unlined checks. The lining of the checks are to be completed with in two years from the adoption of this Order.

Recommendation 2: The lining of the checks/ponds shall be completed by September 1, 2017, or approximately two and a half years from the adoption of this Order, on approximately February 5/6, 2015.

The Monitoring and Reporting Program, page 2, table Monitoring Location Description, calls for Monitoring Points FM-01 and FM-02.

Recommendation 3: Once the checks/ponds are lined, monitoring location FM-01 will be discontinued. The wastewater volume monitoring will be monitored with the remaining monitoring location FM-02 at a location prior to discharge to the land application.

The Monitoring and Reporting Program, page 2, table Monitoring Location Description, Monitoring Point EFF-01 calls for a sampling location where a representative water quality sample of the facility wastewater can be obtained prior to discharge to the lined sump/checks. The Effluent Monitoring Table on page 2 notes that most of the samples are to be 24-hour composite samples.

Recommendation 4: Monitoring Point EFF-01, sampling location where a representative water quality sample of the facility wastewater can be obtained from the discharge once it has interred the lined checks/ponds. This sampling from the lined checks/ponds will represent a composite sample.

Recommendation 5: The Effluent Monitoring table on page 2 shall note that the samples are to be each Grab samples.

The Monitoring and Reporting Program, page 2, table heading Monitoring Point Name, with sampling locations SW-1 and SW-304.

Recommendation 6: The sampling location shall note SW-1, SW-304 and (any new well) including well SW-KFI.

The Monitoring and Reporting Program, page 4, notes the annual Soils Monitoring locations shall be determined with CRWQCB stall concurrence, a suitable number locations with in the land application area.

Recommendation 7: The annual Soils Monitoring locations shall be determined with CRWQCB stall concurrence, a suitable number locations with in the land application area. The soil sampling shall be obtained one to two months prior to the start of the pistachio processing season.

The Monitoring and Reporting Program, page 5, notes the Annual Report shall be due the first day of the second month after the month monitored (i.e., October monitoring shall be due 1 December).

Recommendation 8: The Annual Report shall be due no later than February 15 of the year following the prior years pistachio processing.

If you have any questions or if we may be of further service, please do not hesitate to contact me at (559) 284-6795.

Respectfully submitted,
ERWIN ENGINEERING



Michael R. Erwin, PE
CE18625

cc: Keenan Farms