

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 30/31 July 2015**

**Response to Written Comments for Sunshine Raisin Corporation dba National Raisin Company, Exeter Dehydrating Facility and Ernest Bedrosian Trust,
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 30/31 July 2015, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of revised Waste Discharge Requirements (WDRs) for the Sunshine Raisin Corporation dba National Raisin Company, Exeter Dehydrating Facility and the Ernest Bedrosian Trust in Tulare County. This document contains responses to written comments received from interested parties regarding the Tentative WDRs (TWDRs) circulated on 18 May 2015. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 19 June 2015 to receive full consideration. Comments were received from Provost & Pritchard Consulting Group on behalf of the Sunshine Raisin Corporation (Sunshine Raisin) and Ernest Bedrosian Trust.

Written comments are summarized below, followed by responses from Central Valley Water Board staff. Based on the comments, Central Valley Water Board staff have made some minor changes to the TWDRs. Staff also made a few minor changes to improve clarity and fix typographical errors. Where staff responses below present specific changes made to the TWDRs, additions are in bold text and deletions are in strikeout.

SUNSHINE RAISIN COMMENTS

SUNSHINE RAISIN – COMMENT No. 1: Finding 3 on Page 1 should be modified as follows:

“...which consists of approximately 150 **farmed** acres of land...”

RESPONSE: Finding 3 in the TWDRs has been modified to reflect this change.

SUNSHINE RAISIN – COMMENT No. 2: Sunshine Raisin states, that given the small volume of solid waste generated at the Facility during the processing season, all solids including leaves, sticks, and debris removed during the pre-cleaning process are taken to a landfill for disposal, and that Finding 16 should be modified to reflect this.

RESPONSE: Finding 16 in the TWDRs has been modified as follows:

“Solid waste generated at the Facility, consisting of leaves, sticks, and debris removed during the pre-cleaning process ~~is~~ **as well as screenings and fine solids removed from the wastewater are collected** ~~hauled off-site and taken to a landfill for disposal on a daily basis for compost. Screening and fine solids collected in the settling sump are placed in a bin, and also taken to a the landfill for disposal.~~”

SUNSHINE RAISIN – COMMENT No. 3: Finding 19 on Page 4 should be modified as follows:

“...or ~~applied~~ as a **sidedress application** spray from a water truck between the orchard rows...”

RESPONSE: Finding 19 in the TWDRs has been modified to reflect this change.

SUNSHINE RAISIN – COMMENT No. 4: Sunshine Raisin requests that since EFF-001 is already described in the monitoring location table, that sentence 1, under the Effluent Monitoring section, on Page 2, of the Monitoring and Reporting Program in the TWDRs be modified as follows:

“The Discharger shall monitor effluent at EFF-001 ~~entering the pond~~ during the...”

RESPONSE: The Monitoring and Reporting Program in the TWDRs has been modified to reflect this change.

SUNSHINE RAISIN – COMMENT No. 5: Sunshine Raisin requests that the last paragraph, on Page 2, of the Information Sheet be modified to reflect the changes made to Finding 19 as discussed in COMMENT No. 3 above.

RESPONSE: The Information Sheet has been modified to reflect the changes to Findings 16 and 19 in response to the above comments.