



February 19, 2021

Daniel Benas  
California Regional Water Quality Control Board  
1685 E Street  
Fresno, CA 93706

**SUBJECT: Comments to Tentative Waste Discharge Requirements:  
Shafter Carrot Packing Plant, Grimmway Enterprises, Inc. – Shafter  
California**

Dear Mr. Benas:

Grimmway Enterprises, Inc. (Grimmway) has received the tentative Waste Discharge Requirements (WDR) and tentative Monitoring and Reporting Requirements (MRP), dated January 22, 2021, for their packing facility in Shafter, California. The Notice that accompanied the tentative WDRs and MRPs indicate the opportunity for all concerned persons and agencies to comment on them. Grimmway has reviewed the tentative WDR and MRP and is submitting the following comments to the Central Valley Regional Water Quality Control Board for consideration. For clarity, the WDR or MRP items have been repeated in *italics* prior to each response.

## **Monitoring and Reporting Program**

### **II Specific Monitoring Requirements**

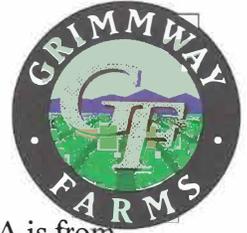
#### **Influent Monitoring (INF-001), Page 3**

*Samples shall be collected of the waste stream immediately before it enters the wastewater settling ponds at the Carrot Packing Plant. Settling Pond Influent monitoring shall include the following:*

**Comment:** Flow into the settling ponds is reused within the facility's water flow system before discharge to the Minter Field Land Application Area (LAA). Settling Pond influent monitoring (flow and quality) will not provide any data that is needed to calculate constituent loads to the LAA. We request that all monitoring requirements be removed from Influent Monitoring (INF-001).

#### **Supplemental Irrigation Water Monitoring (SUP-001), Page 6**

*Samples shall be representative of the supplemental irrigation water supplied to the LAA. If supplemental irrigation water is from more than one source, the results shall be presented as a flow-weighted average from all sources. At a minimum, when in use, supplemental irrigation water shall be monitored as specified below:*



**Comment:** The only potential source of supplemental irrigation water to the LAA is from the Friant-Kern Canal. Supplemental irrigation is not anticipated to be utilized at the LAA. We request that the use of the most recent published water quality data be an option in lieu of sample collection and subsequent quality analysis.

Thank you for providing us with the opportunity to review and comment on the tentative WDR and MRP for the Shafter Carrot Packing Plant. We ask that you fully consider our comments before issuance of the Order. Please contact me at (661) 363-4732, if you have questions or need additional information.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Robert Wegis', is written over a horizontal line.

Robert Wegis  
Regulatory Compliance Manager  
Grimmway Enterprises, Inc.