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Date: September 14, 2007

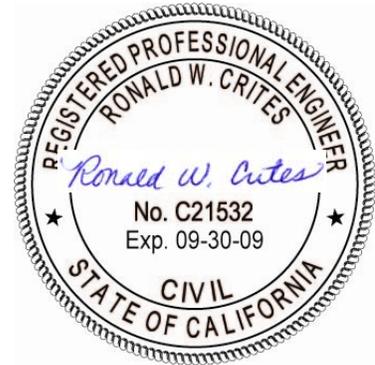
To: Jeff Pyle, Regional Water Quality Control Board – Fresno Office

cc: Steve King, SK Foods - Lemoore

From: Lance Hershman, Brown and Caldwell

Reviewed by: Ron Crites, Brown and Caldwell

Subject: SK Foods Tentative WDR Comments



This memorandum contains comments regarding the Tentative Waste Discharge Requirements Order NO. R5-2007-XXX (WDR) prepared by the Regional Water Quality Control Board for the SK Foods Lemoore tomato processing facility in Kings County. Each comment is preceded with the document name (WDR or Monitoring and Reporting Program [MRP]), page number, and item number.

WDRs, pg 3, Item 8 – Change “8 mgd” to “8 million gallons”.

WDR, throughout text – The term “WWTF” is used throughout the text. The term is not defined and it is unclear whether it represents the processing plant or land application area. We recommend replacing “WWTF” with “processing facility”, “use area”, or “land application area”, according to the context.

WDR, pg 7, Item 30, last sentence – The last sentence states that “...seven piezometers (P-1 through P-7) were already present as shown on Attachment C, and will be used to record groundwater elevation data...”. It was not SK Foods intent to monitor all seven of the piezometers. Currently, only three of the seven piezometers are being monitored for groundwater elevation due to the subsequent placement of 11 monitoring wells. The remaining piezometers will not be incorporated into the existing Monitoring and Reporting Program unless otherwise deemed necessary in the future.

WDR, pg 12, Item 51b – Discharge specification “C.3” should be changed to “C.4”.

WDR, pg 12, Item 51c – Discharge specification “C.4” should be changed to “C.5”.

WDR, pg 14, C.4 – Blending wastewater with supplemental/irrigation water at a ratio of 1:1 may not be possible due to supplemental water availability, especially under drought conditions. SK Foods will make every effort to mix wastewater with supplemental/irrigation water, either at the processing facility or at the Use Area, when available. Mixing of wastewater and supplemental water at the Use Area began in August 2007. Hydraulic loading conditions for both supplemental water and wastewater will be documented in monthly monitoring reports. If nuisance conditions are observed at the Use Area due to insufficient mixing in the future, they will be documented in the monthly reports and additional mitigation measures will be initiated.

During the 2007 season, SK Foods proposes to plant 329 acres of sorghum, 185 acres of corn, and 312 acres of organic processing tomatoes, as shown on the enclosed crop map (Enclosure A). Not all crops will be irrigated with process water.

WDR, pg 15, E.1-3 – This section does not expressly state that permanent disposal and/or reuse of screened solids from the tomato processing facility at the Use Area is allowed. As stated in the Information Sheet, this section should state the following: “In the event the current off-site solids disposal option ceases, the screenings will be land applied to a portion of the 2,600-acre Use Area.”

MRP, pg 4, Groundwater Monitoring Table – Footnote 3 does not apply and should be removed.

If you have any questions, please contact Lance Hershman at (916) 853-5375 or Ron Crites at (530) 204-5204.

LAH:

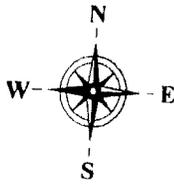
Enclosures (1)

1. Enclosure A – 2007 Crop Map

**Enclosure A**  
2007 Crop Map

# SSC FARMING, LLC

Post Office Box 160  
Lemoore, California  
93245-0160

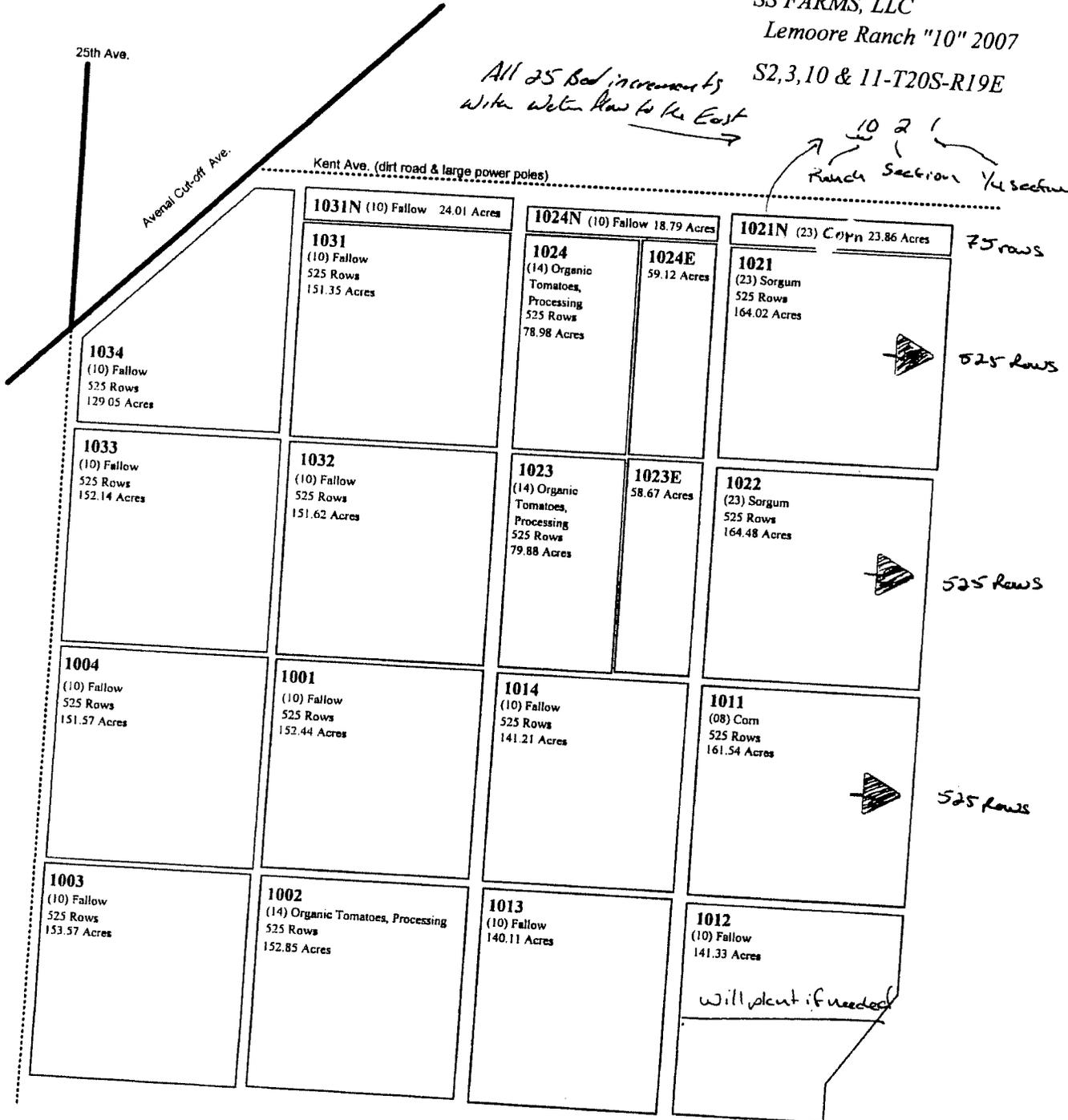


Operated by  
SS FARMS, LLC  
Lemoore Ranch "10" 2007

S2,3,10 & 11-T20S-R19E

*All 25 Bad increments  
with water flow to the East*

*10 2 1  
Ranch Section 1/4 section*



KINGS COUNTY  
16-07-5404284