

August 21, 2015

Denise Soria
CA Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

Re: Tentative Waste Discharge Requirements - Comments
Sunview Marketing International (DBA Sunview Dried Fruit & Nut Company) Dehydrator
Del Rey - Fresno County, CA

Dear Ms. Soria:

On behalf of Sunview Marketing International DBA Sunview Dried Fruit & Nut Company (**Sunview**), the following comments are submitted regarding the Tentative Waste Discharge Requirements document (**TWDRs**) for their dehydrator facility (**Facility**) located at 12400 E. Adams Avenue, Del Rey, California.

Tentative Waste Discharge Requirements

1. **Page 4 - Paragraph 14.** For clarity and an understanding that storm water could enter the storm water pond at any time prior to adoption of the WDRs and that this water could be used as noted. - "~~At this time~~Historically, storm water in the storm water pond ~~is was~~ not comingled with process wastewater."
2. Sunview submitted a Dust Control Technical Report to the Water Board on July 17, 2015. It is understood that the Water Board is in the process of reviewing this report and therefore the provisions and requests for submittal of this report in the TWDRs should be modified or deleted.
 - a. **Page 5 - Paragraph 17.** – Modify portions of paragraph.
 - b. **Page 23 – Paragraph 12.** – Modify or remove entire paragraph.
 - c. **Information Sheet Page 4 – 1st Paragraph.** Modify portions of paragraph.
 - d. **Information Sheet Page 7 – Last Paragraph.** Modify portions of paragraph.
3. **Page 6 – Paragraph 18.** Storm water could be available anytime throughout the year depending on rainfall occurrence and storage; therefore applications should not be limited to the spring. - "... and apply it directly to the LAA ~~in the spring~~ at agronomically acceptable rates."
4. **Page 19 – Paragraph 8.** Remove reference to G.10. "... as part of the Wastewater and Nutrient Management Plan required by Provisions ~~G.10 and~~ G.11."
5. **Page 20 – F. Solids Specifications.** Pomace and diatomaceous earth are winery solids and are not produced at the Facility. "... but not limited to, grape stems ~~and pomace, diatomaceous earth,~~ and semisolid residues ..."

Tentative Monitoring & Reporting Program

The labor and laboratory expenses to comply with the Monitoring & Reporting Program are significant. As noted in the MRP, Sunview understands and appreciates the ability to request a reduction in the monitoring frequency after 12 months of monitoring.

1. **Page 3 – Land Application Area Monitoring.** Add clarification to sentence. “In addition, the Discharger shall perform the following routine monitoring and loading calculations for each discrete irrigation field within the LAA **when discharging and while wastewater is applied to the land application area.**”
2. **Page 4 – Dust Control Applications Monitoring.** Measuring the application length of the roads on a daily basis to the nearest foot is beyond the precision needed. With the road lengths established and as provided in the Dust Control Technical Report an estimate should be adequate. “Length of Road - **Measured Estimated**”.
3. **Page 4 – Storm Water Monitoring.** Storm water comingling with the process wastewater increases the volume but not the constituent concentrations. An estimate rather than a measurement of the gallons on a daily basis should be adequate. “Volume of Storm Water - **Measured Estimated**”.
4. **Page 5 – Reporting.** As a seasonal operation, discharges for the first and second quarters (January – June) would not be significant (if any) and therefore quarterly monitoring reports may consist of a letter signifying no discharges or monitoring occurred. Eventually, reporting on an annual basis may be requested.

Information Sheet

1. Page 4 – 2nd Paragraph – As noted earlier: “... and apply it directly to the LAA **in the spring at agronomically acceptable rates.**”

Thank you for the opportunity to provide these comments and Sunview appreciates the collaborative efforts of the Water Board staff.

Respectfully,


Donald Ikemiya, RCE 56,630



c: Brian Bean, Andrew Zaninovich – Sunview Dehydrator