

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

ORDER R5-2015-XXXX

WASTE DISCHARGE REQUIREMENTS

GRIMMWAY ENTERPRISES, INC.
SHAFTER CARROT PACKING PLANT
AND
NORTH KERN WATER STORAGE DISTRICT
KERN COUNTY

The California Regional Water Quality Control Regional Board, Central Valley Region, (hereafter Central Valley Water Board) finds that:

1. On 19 March 2013, Grimmway Enterprises, Inc., submitted a Report of Waste Discharge (RWD) that describes expansion of the discharge of carrot washing wastewater from its existing Shafter Carrot Packing Plant (hereafter "Plant"), and a change in discharge location to North Kern Water Storage District's Rosedale groundwater recharge area spreading basins. Additional information to complete the RWD was submitted as a technical report on 25 July 2014.
2. Grimmway Enterprises, Inc. (hereafter "Discharger" or "Grimmway"), owns and operates the facility that generates the waste. North Kern Water Storage District (hereafter "Discharger" or "North Kern") owns the land application areas (LAAs), which are within the Rosedale recharge area. Grimmway and North Kern are responsible for compliance with these Waste Discharge Requirements (WDRs). The term "Discharger" shall be used to refer to Grimmway Enterprises, Inc., and North Kern Water Storage District, collectively.
3. The Plant and wastewater storage ponds are at 6301 South Zerker Road in Shafter (Section 15, T28S, R26E, MDB&M), occupying Assessor's Parcel Number (APN) 091-090-18. The LAAs are the North Kern spreading basins at the Rosedale groundwater recharge area (Sections 22 and 27, T28S, R26E, MDB&M), which cover an area of about 592 acres adjacent to and south of the Calloway Canal at Zerker Road, occupying APNs 091-190-17 and 091-120-04. Attachment A, which is attached hereto and made part of this Order by reference, is a vicinity map. Attachments B and C, also attached hereto and made part of this Order by reference, are site maps for the Plant property and LAAs, respectively.
4. WDRs Order 5-01-140, adopted by the Central Valley Water Board on 14 June 2001, prescribes requirements for the existing discharge to onsite ponds prior to discharge of up to 0.300 million gallons per day (mgd), as a monthly average, to the collection system of the Minter Field Airport District Wastewater Treatment Facility (Minter Field WWTF). The Minter Field WWTF is closing down and the local sewer system will no longer be available for disposal of Plant wastewater. The Discharger proposes to expand the Plant to produce up to 0.700 mgd, cease discharging to the Minter Field WWTF, and discharge to the North Kern Rosedale recharge project instead. Therefore, Order 5-01-140 will be rescinded and replaced with this Order.

Facility and Discharge

5. The Plant receives fresh, whole carrots, packs them, and ships them to buyers or to another Grimmway facility for processing. The 79-acre Plant property includes office buildings, truck

parking, truck unloading, carrot washing facilities, a storm water basin, and a system of unlined wastewater ponds.

6. Trucks haul carrots from the field to soaker sheds at the Plant where carrots are initially rinsed with well water. The carrots are then flushed from the trailers at the washout area to a flume using recycled wash water pumped from a wastewater settling pond, which Grimmway calls the recycle pond (POND-004). The carrots are then conveyed to the packing shed, where they are cleaned using brush washers and fresh chlorinated water. The final wash occurs during the hydro-cooling process using more fresh chlorinated water. Grimmway packs and stores the clean carrots. Attachment D, which is attached hereto and made part of this Order by reference, is a process flow diagram for the Plant and discharge.
7. All carrot-washing wastewater is combined in the recycle pond for settling of sand and silt. Water from the recycle pond is pumped back to the Plant for reuse in the washout area and flume. Grimmway has not recorded wastewater flow from the Plant to the unlined ponds or the flow of wastewater recycled back to the Plant. The RWD does not include estimates of evaporation or percolation from the ponds.
8. Valve settings control whether the ponds are in series or parallel, and allow Grimmway to take particular ponds out of service for maintenance while continuing to use the remaining ponds. The effluent pump controls the water level in the final pond. The water level in all the other ponds is generally fixed at the elevation of each outflow pipe. Grimmway has occasionally reconfigured the unlined ponds to optimize operation and maintenance without significantly changing the purpose or location of the pond system.
9. Grimmway's current discharge from the last unlined pond into the Minter Field WWTF collection system will be replaced with discharge to a wastewater line connected to LAAs at the North Kern recharge project. In 2013, the average flow out of the final pond into the collection system was about 0.14 mgd.
10. The domestic wastewater stream at the Plant is entirely separate from the wash water stream. Wastewater from evaporative cooling processes at the Plant is discharged to the domestic system rather than to the wastewater ponds. The RWD states that the domestic wastewater system will be connected to the City of Shafter community sewer line in preparation for closure of the Minter Field WWTF. The City's sewer conveys wastewater to the North of River Sanitary District No. 1 WWTF, about 10 miles southwest of the Plant.
11. Supply water for the Plant is provided by an onsite well. The supply water is relatively poor quality with respect to salinity. Table 1 presents the average results of quarterly water supply monitoring from September 2011 through August 2014.

Table 1. Plant Water Supply Well Quality

<u>Parameters</u>	<u>Units</u>	<u>Average</u>	<u>Range</u>
EC ¹	umhos/cm	1,550	1,350 – 2,100
TDS ²	mg/L	1,030	930 – 1,120
Nitrate (as N)	mg/L	< 0.1	< 0.1 - 0.1
Sodium	mg/L	285	254 - 308

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<u>Parameters</u>	<u>Units</u>	<u>Average</u>	<u>Range</u>
Chloride	mg/L	285	247 - 305
Sulfate	mg/L	384	320 - 420
Boron	mg/L	< 0.1	< 0.1 - 0.2
Hardness (as CaCO ₃)	mg/L	209	152 - 571

¹ Electrical conductivity.

² Total dissolved solids.

12. As required by WDRs Order 5-01-140, Grimmway monitors wastewater quality prior to discharge to the Minter Field WWTF. Table 2 presents the average results of quarterly wastewater monitoring from September 2011 through August 2014.

Table 2. Plant Wastewater Quality

<u>Parameters</u>	<u>Units</u>	<u>Average</u>	<u>Range</u>
BOD ¹	mg/L	161	27 – 690
EC	umhos/cm	2,130	1,902 – 2,250
TDS	mg/L	1,560	1,280 – 1,920
Total Nitrogen	mg/L	3.6	< 1.0 – 10
Sodium	mg/L	329	280 – 409
Chloride	mg/L	388	330 – 420
Sulfate	mg/L	456	330 – 800
Boron	mg/L	0.4	< 0.1 – 2.3
Hardness (as CaCO ₃)	mg/L	577	218 – 2,120

¹ Five-day biochemical oxygen demand.

13. Grimmway submitted Materials Safety Data Sheets describing the chemicals used at the Plant for sanitation and disinfection. The active ingredients in the chemicals include: acetic acid, citric acid, phosphoric acid, peroxyacetic acid, hydrogen peroxide, 2-butoxyethanol, lauramine oxide, n-alkyl dimethyl benzyl ammonium chlorides, n-alkyl dimethyl ethylbenzyl ammonium chlorides, polyethylene glycol mono(nonyl phenol) ether, tetrasodium ethylenediaminetetraacetate, sodium hypochlorite, sodium hydroxide, potassium hydroxide, sodium metasilicate, sodium tripolyphosphate, and surfactants. The organic chemicals are commonly used and considered low toxicity.
14. Grimmway and North Kern were actively negotiating the terms of an agreement during preparation of this Order. The agreement is expected to authorize Grimmway's long-term discharge to the Rosedale recharge area and define the roles and responsibilities of each party. Grimmway has indicated it will accept responsibility for compliance with all the terms and conditions of this Order. North Kern reportedly intends to allow Grimmway access to its facilities. This Order requires the Discharger to submit, for Executive Officer approval,

documentation that the parties have a certified agreement consistent with compliance with this Order.

15. Grimmway intends to grow orchard grass to increase atmospheric nitrogen losses in the LAAs, but it will not harvest a crop. The RWD describes LAAs varying in size from 17 acres to 440 acres. The wastewater may be blended with surface water at times, but will generally be applied unblended. As surface water becomes available, North Kern will apply it to the same areas that receive wastewater. This Order requires the Discharger to submit a Land Application Area Management Plan describing how it will minimize localized groundwater degradation by rotating wastewater application through different LAAs within the North Kern recharge project.
16. Organic matter in the discharge increases the biochemical oxygen demand (BOD). Overloading of LAAs with high organic strength wastewater can create objectionable odors and induce soil conditions leading to groundwater degradation with metals and other constituents. The minimum acreage of LAA described in the RWD is 17 acres. The cycle average and maximum instantaneous BOD loading rates are expected to be less than 50 pounds per acre per day and 250 pounds per acre per day, respectively.
17. North Kern has agreements with various parties for access to water for groundwater recharge. The availability of water for recharge depends primarily on precipitation in the region. Table 3 presents recharge flows applied per year in millions of gallons (MG) from 1991 through 2013, calculated from data presented in the RWD.

Table 3. Recharge Water Quantity (1991 through 2013)

<u>Year</u>	<u>MG</u>	<u>Year</u>	<u>MG</u>
1991	0	2003	0
1992	489	2004	17
1993	882	2005	11,000
1994	100	2006	19,800
1995	20,300	2007	4,760
1996	7,450	2008	12
1997	10,400	2009	660
1998	24,900	2010	392
1999	2,590	2011	21,200
2000	0	2012	959
2001	0	2013	0
2002	67		

18. The average annual recharge volume reported for the period of 1991 through 2013 is about 5,480 MG (about 16,800 acre-feet), or 28.4 feet of water spread over the 592-acre recharge area. Over the same 23-year period, there were four years when North Kern applied over 100 feet of surface water to the area. At the proposed maximum wastewater flow (182 MG/year), Grimmway's proposed discharge would average less than a 1-foot depth of water over the 592 acres of application areas, which represents about three percent of the total water applied.

19. Table 4 presents average surface water quality data from the Beardsley canal used for recharge in 2012 and 2013.

Table 4. Recharge Water Quality

<u>Parameters</u>	<u>Units</u>	<u>Average</u>	<u>Range</u>
EC	umhos/cm	192	140 - 250
TDS	mg/L	112	42 - 170
Nitrate (as N)	mg/L	< 0.5	< 0.5 - 0.8
Sodium	mg/L	17	13 – 26
Chloride	mg/L	7.0	4.1 – 11
Sulfate	mg/L	20	9.9 – 38
Boron	mg/L	< 0.2	< 0.1 - 0.2

Site-Specific Conditions

20. The Plant and Land Application Area are at an elevation of approximately 415 feet and 375 feet above mean sea level, respectively. The climate is arid, with hot summers and mild winters. The rainy season generally extends from November through March. Occasional rains occur during the spring and fall months, but summer months are dry. Average annual precipitation and evaporation (Class 'A' pan) in the area are about 6.0 inches and 64.8 inches, respectively, according to information published by the California Department of Water Resources (DWR). The California Irrigation Management Information System (CIMIS) database reports an annual average potential evapotranspiration (ETo) of 57 inches for Shafter.
21. According to United States Department of Agriculture, Natural Resources Conservation Service soil survey maps, soils in the vicinity of the Plant, including areas containing the unlined ponds, and the majority of the LAA, are Driver series coarse sandy loam. These soils are described as nonsaline, well drained, moderately high hydraulic conductivity, and prime farmland when irrigated. The land capability classification of the soil for irrigation is II-s, which has little or no restrictions on cultivation.
22. According to Federal Emergency Management Agency (FEMA) map number 06029C1800E, updated 26 September 2008, the Plant and application area are outside of the 100-year return frequency flood zones.
23. The commodities (crops) identified in the 2013 Kern County pesticide permitting database within two miles of the Plant and land application areas are: almond, grape, alfalfa, potato, pistachio, apple, cotton, wheat, carrot, garlic, tomato, cherry, onion, oat, and safflower. The most recent DWR land use survey for Kern County (dated 2006) also identifies the same crops, as well as green beans, dry beans, carrots, and olives.

Groundwater Conditions

24. The Plant is in the North Kern Hydrologic Area (No. 558.80) of the South Valley Floor Hydrologic Unit, as depicted on hydrologic maps prepared by State Water Resources Control Board in August 1986.
25. According to United States Geologic Survey maps, the unconfined aquifer underlying the Plant and application area extends to a depth of over 2,000 feet below ground surface. The discharges are outside the Corcoran Clay area and the alluvium is not expected to contain any continuous, low-permeability confining layers.
26. Groundwater underlying the LAAs is generally first encountered at about 250 feet below ground surface (bgs) in the area of the Plant and LAAs, and flows north according to *Lines of Equal Elevation of Water in Wells in Unconfined Aquifer*, published by DWR in Spring 2010. The recharge project induces intermittent, localized groundwater mounding.
27. The 2007 Annual Water Supply Report from the Kern County Water Agency includes a map with lines of equal concentration of total dissolved solids based on data from samples of first encountered groundwater collected prior to 1991. The map shows that a zone of groundwater in the vicinity of the Grimmway Plant, approximately 10 miles long and 6 miles wide, has elevated total dissolved solids ranging from about 500 mg/L to 2,500 mg/L. Based on the map, groundwater beneath the Plant has a concentration of total dissolved solids of about 2,000 mg/L, which corresponds to an EC of about 3,000 umhos/cm. The source of the elevated salinity has not been identified, but is likely historical oil field discharges. Published data from nearby groundwater wells show the high concentrations of saline constituents (largely sulfate, sodium, and chloride) in the vicinity of the Plant date back to at least 1936.
28. North Kern has operated the groundwater recharge project at the application area since the 1950s. North Kern applies surface water from the Kern River and, to a lesser extent, from other surface water sources to the LAAs, where it percolates to recharge groundwater. During wet years like 1995, 1998, 2006, and 2011, North Kern applied more than 100 feet of water per year to the LAAs (about 10 billion gallons). North Kern monitors water quality during dry years when it draws water from its network of groundwater extraction wells. North Kern also maintains one groundwater monitoring well in the center of the recharge area to monitor first-encountered groundwater. Monitoring data from the North Kern wells show the significant influence of the recharge project on local groundwater quality.
29. Based on electric logs of nearby wells and considering sources of recharge in the area, groundwater near the surface is expected to be of poorer quality than deeper groundwater near the Plant. However, near the recharge project and unlined canals (i.e., the Lerdo Canal), first encountered groundwater is expected to be of better quality than deeper groundwater.
30. Table 5 summarizes published groundwater quality data for wells near the Plant and discharge area. The data show that groundwater near the Plant is of much poorer quality than groundwater underlying the application area (groundwater recharge area). None of the data necessarily represent first-encountered groundwater, but the top of the screened intervals is thought to be within 200 feet of the groundwater surface.

Table 5. Groundwater Quality

Parameters	Units	Groundwater Near the Plant		Groundwater at the Application Area
		North Kern Well ¹	USGS Well ²	North Kern Wells ³
pH ⁴	std.	7.7	7.8	8.2
EC	umhos/cm	2,650	2,960	472
TDS	mg/L	1,740	1,980	295
Nitrate (as N)	mg/L	13	8.1	1.3
Sodium	mg/L	307	52	73
Chloride	mg/L	371	480	52
Sulfate	mg/L	712	750	88
Boron	mg/L	0.1	0.1	0.1
Hardness (as CaCO ₃)	mg/L	608	680	53

¹ Average of all results from 1977 through 2013 for North Kern well 8-03-009, near the western boundary of the Plant property.

² Results of a single sample collected in 1955 from USGS well 028S026E15F001M (total depth 522 feet below ground surface), immediately north of the Plant property.

³ Average of all results from 1977 through 2013 for seven North Kern wells within the LAAs (99-00-017, 99-00-018, 99-00-022, 99-02-004, 99-02-006, 99-02-008, and 99-04-005).

⁴ Value shown for pH is the median, rather than average.

31. The Antidegradation Analysis submitted as part of the RWD states that nearby well tests show the transmissivity of the aquifer is 160,000 to 460,000 gallons per day per foot and the hydraulic conductivity is 441 to 1,270 gallons per day per foot. It indicates that at an average gradient of 17 feet per mile, the flow of groundwater underlying the application area is between 3.8 mgd and 11 mgd. The analysis demonstrates that groundwater flow beneath the discharge area will likely affect the fate of waste in groundwater.

Basin Plan, Beneficial Uses, and Regulatory Considerations

32. The *Water Quality Control Plan for the Tulare Lake Basin*, Fourth Edition (hereafter Basin Plan) designates beneficial uses, establishes water quality objectives, contains implementation plans and policies for protecting waters of the basin, and incorporates by reference plans and policies adopted by the State Water Board. Pursuant to Water Code section 13263(a), waste discharge requirements must implement the Basin Plan.
33. Local drainage is to Valley Floor Waters. The beneficial uses of Valley Floor Waters, as stated in the Basin Plan for Hydrologic Area No. 558, are agricultural supply; industrial service supply; industrial process supply; groundwater recharge; water contact recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat; preservation of biological habitats of special significance; and enhancement of rare, threatened, or endangered species.

34. The beneficial uses of underlying groundwater, as stated in the Basin Plan for Detailed Analysis Unit 256 within the Kern County Basin hydrologic unit, are municipal and domestic supply, agricultural supply, industrial service supply and industrial process supply.
35. The Basin Plan establishes narrative water quality objectives for chemical constituents, tastes and odors, and toxicity in groundwater. It also sets forth a numeric objective for total coliform organisms.
36. The Basin Plan's numeric water quality objective for bacteria requires that the most probable number (MPN) of coliform organisms over any seven-day period shall be less than 2.2 per 100 mL in groundwater designated for municipal or domestic supply (MUN).
37. The Basin Plan's narrative water quality objectives for chemical constituents, at a minimum, require waters designated as domestic or municipal supply to meet the MCLs specified in Title 22 of the California Code of Regulations (hereafter Title 22). The Basin Plan recognizes that the Central Valley Water Board may apply limits more stringent than MCLs to ensure that waters do not contain chemical constituents in concentrations that adversely affect beneficial uses.
38. The narrative toxicity objective requires that groundwater be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, animal, plant, or aquatic life associated with designated beneficial uses.
39. Quantifying a narrative water quality objective requires a site-specific evaluation of those constituents that have the potential to impact water quality and beneficial uses. The Basin Plan states that when compliance with a narrative objective is required to protect specific beneficial uses, the Central Valley Water Board will, on a case-by-case basis, adopt numerical limitations in order to implement the narrative objective.
40. In the absence of specific numerical water quality limits, the Basin Plan methodology is to consider any relevant published criteria. General salt tolerance guidelines, such as *Water Quality for Agriculture* by Ayers and Westcot and similar references indicate that yield reductions in nearly all crops are not evident when irrigation water has an EC less than 700 $\mu\text{mhos/cm}$. There is, however, an eight- to ten-fold range in salt tolerance for agricultural crops and the appropriate salinity values to protect agriculture in the Central Valley are considered on a case-by-case basis. It is possible to achieve full yield potential with waters having EC up to 3,000 $\mu\text{mhos/cm}$ if the proper leaching fraction is provided to maintain soil salinity within the tolerance of the crop.
41. The Basin Plan identifies the greatest long-term problem facing the entire Tulare Lake Basin as the increase in salinity in groundwater, which has accelerated due to the intensive use of soil and water resources by irrigated agriculture. The Basin Plan recognizes that degradation is unavoidable until a mechanism to carry salts out of the basin is established. To limit the degradation, the Basin Plan establishes several salt management requirements, including:
 - a. Industrial dischargers shall be required to limit the increase in EC of a point source discharge to surface water or land to a maximum of 500 $\mu\text{mhos/cm}$. A lower limit may be required to assure compliance with water quality objectives.
 - b. Discharges of municipal and domestic wastewater to areas that may recharge good quality groundwater shall not exceed an EC of 1,000 $\mu\text{mhos/cm}$, a chloride

concentration of 175 mg/L, or a boron concentration of 1.0 mg/L. The Basin Plan states that effluent limits established for municipal waste discharges will generally apply to industrial wastes.

42. The Basin Plan allows an exception to the EC limit of source water plus 500 umhos/cm when the discharger technically demonstrates that allowing a greater net incremental increase in EC will result in lower mass emissions of salt and in conservation of water, provided that beneficial uses are protected. Grimmway has implemented water saving measures (recycle flows) that result in lower mass emissions of salt at the Plant. In December 2013, Grimmway reportedly began reducing recycle flows in order to reduce final effluent EC. As a result, Grimmway reduced the difference in EC between the supply well and wastewater from an average of almost 700 umhos/cm in 2013 to less than 400 umhos/cm in 2014. While Grimmway has not presented a full technical demonstration that it meets the criteria for exception from the incremental EC limit, there is enough information in the record to justify the exception. Monitoring and Reporting Program (MRP) R5-2015-XXXX, which is attached hereto and made part of this Order by reference, requires Grimmway to submit salt balance calculations, quantifying the mass emissions of salt saved through water conservation at the Plant on an on-going basis.
43. Since the discharge meets the conditions for exception from the Basin Plan incremental EC limit for EC (Finding 42), which includes the expectation that potential groundwater degradation will not adversely affect beneficial uses of groundwater (see Findings 24 through 31), the specific effluent limits for EC and chloride listed in Finding 41(b) do not appear to be appropriate in this case. The effluent limit for boron appears to be applicable, but unnecessary given the low concentrations of boron in the discharge.
44. The Basin Plan states that groundwater shall not contain chemical constituents in concentrations that adversely affect beneficial uses. As groundwater salinity increases, the first adverse effects generally impact agricultural beneficial use of water for irrigation of salt-sensitive crops. The list of crops in Finding 23 is not intended as a definitive inventory of crops that are or could be grown in the area affected by the discharge, but it is representative of current and historical agricultural practices in the area. Growers rely on groundwater supplies for irrigation of salt-sensitive crops in the area.

Antidegradation Analysis

45. State Water Resources Control Board Resolution 68-16 ("Policy with Respect to Maintaining High Quality Waters of the State") (hereafter Resolution 68-16) prohibits degradation of groundwater unless it has been shown that:
 - a. The degradation is consistent with the maximum benefit to the people of the state.
 - b. The degradation will not unreasonably affect present and anticipated future beneficial uses.
 - c. The degradation does not result in water quality less than that prescribed in state and regional policies, including violation of one or more water quality objectives, and
 - d. The discharger employs best practicable treatment or control (BPTC) to minimize degradation.

46. Degradation of groundwater quality by some of the typical waste constituents associated with discharges from food processing plants, after effective source control, treatment, and control measures are implemented, is consistent with the maximum benefit to the people of the state. The Discharger's operation provides 420 local jobs, with more anticipated with the planned expansion. The economic prosperity of valley communities and associated industry is of maximum benefit to the people of the state, and provides sufficient justification for allowing the limited groundwater degradation that may occur pursuant to this Order.
47. There are two discharge areas where underlying groundwater may be affected by discharge from the Plant: the unlined ponds on the Plant property and the LAAs at the North Kern recharge basins. As described in Finding 30, groundwater quality differs between these two areas. Assessment of potential groundwater degradation requires a separate analysis for each discharge location.
48. Table 6 summarizes the available data for constituents of concern in the discharge, groundwater underlying both discharge locations, and presents the projected long-term average character of water to be applied to the LAAs.

Table 6. Summary of Constituent Concentrations

<u>Parameters</u>	<u>Units</u>	<u>Discharge</u> ¹	<u>Plant Property Groundwater</u> ²	<u>LAA Groundwater</u> ³	<u>Projected Long-Term Average of Applied Water</u> ⁴
EC	umhos/cm	2,130	2,650	472	256
TDS	mg/L	1,560	1,740	295	154
Total Nitrogen	mg/L	3.6	13	1.3	2.0
Nitrate (as N)	mg/L	< 1	13	1.3	1.3
Sodium	mg/L	329	307	73	27
Chloride	mg/L	388	371	52	19
Sulfate	mg/L	456	712	88	37
Boron	mg/L	0.4	0.1	0.1	0.2

¹ Average from October 2009 through September 2014.

² Average of results from 1977 through 2013 for North Kern well 8-03-009, near the western boundary of the Plant property.

³ Average of all results from 1977 through 2013 for North Kern wells within the application area (99-00-017, 99-00-018, 99-00-022, 99-02-004, 99-02-006, 99-02-008, and 99-04-005).

⁴ Calculated flow-weighted average values using average recharge flows from 1991 through 2013 with the maximum annual wastewater flow of 182 MG.

49. Self-monitoring reports in the record characterize the quality of effluent from the unlined ponds on the Plant property. While there is no data describing pond influent, it is expected to have higher concentrations of settleable solids (due to settling of sand and silt) and lower concentrations of dissolved solids (due to evaporation in the ponds) than pond effluent.
50. Table 6 shows that groundwater underlying the Plant property is generally poorer quality than the discharge. As the record does not yet contain shallow groundwater monitoring data, the groundwater data shown in Table 6 is based on samples from relatively deep wells. The characterization is thought to approximate groundwater conditions. As explained in Finding

29, groundwater underlying the Plant is expected to be poorer quality near the surface. However, the available data shows concentrations of chloride and boron in the wastewater are near and may be slightly higher than receiving groundwater concentrations.

51. Constituents of concern having potential to degrade groundwater underlying the Plant property include chloride and boron.
 - a. **Chloride.** Groundwater chloride concentrations already exceed the Recommended Secondary MCL for chloride of 250 mg/L. The difference between the chloride concentrations shown in Table 6 for groundwater and wastewater appear to be insignificant and groundwater degradation with chloride is unlikely. If the discharge to unlined ponds causes groundwater degradation with chloride, it will not exceed the Upper Secondary MCL for chloride of 500 mg/L.
 - b. **Boron.** While some degradation of groundwater quality with boron may occur, the discharge does not threaten to cause groundwater to exceed the lowest potential water quality goal for boron of 0.5 mg/L.
52. Assessment of potential groundwater degradation at the LAAs needs to consider that dilution with recharge flows will occur intermittently, depending primarily on surface water availability. As presented in Findings 17 and 18, recharge flow data from North Kern for the period of 1991 through 2013 show an average of 5,760 million gallons per year with highs of over 20 billion gallons per year. Based on the average for this period, the maximum proposed annual wastewater discharge (182 MG) represents about three percent of the average annual recharge flow over the long term. At current discharge flows (about 52 MG in 2013), the wastewater represents less than one percent of the average applied water.
53. Groundwater underlying the LAAs is significantly better quality than water quality goals for the designated beneficial uses. Discharge to the LAAs over extended dry periods (i.e., five years or more) may result in some degradation of groundwater with salts. However, recharge during wet years will dilute the concurrent wastewater discharge, and dilute groundwater affected by percolating/percolated wastewater from previous dry years. The long-term viability of discharge to the LAAs depends on surface water flows to maintain suitable groundwater quality before the discharge adversely affects beneficial uses. This Order, by MRP R5-2015-XXXX, requires the Discharger to monitor the North Kern groundwater monitoring well and the extraction well network in order to track trends in groundwater quality.
54. Constituents of concern in the discharge that have the potential to degrade groundwater quality underlying the LAAs include salts (EC, TDS, and specific ions including sodium, chloride, and sulfate), nitrogen (organic nitrogen that can convert to nitrate), and boron.
 - a. **Electrical Conductivity, Total Dissolved Solids, Chloride, Sulfate and Sodium.** The discharge, if not properly managed, has potential to degrade groundwater with EC, TDS, chloride, and sulfate. However, as mentioned in Findings 52 and 53, above, dilution of these constituents will prevent the discharge from causing excessive degradation. This Order implements limits and requires sufficient monitoring to prevent the discharge from causing degradation in excess of water quality objectives.
 - b. **Nitrate.** The discharge has very limited potential to degrade groundwater quality with nitrate. The average concentration of total nitrogen in the wastewater, primarily present in the form of organic nitrogen, is less than 5 mg/L and does not threaten to cause groundwater to contain nitrate above the Primary MCL of 10 mg/L as nitrogen.

- c. **Boron.** In the same way as the unlined pond discharge at the Plant property, while some degradation of groundwater quality with boron may occur, the discharge does not threaten to cause groundwater to exceed the lowest potential water quality goal for boron of 0.5 mg/L.
55. This Order establishes effluent and groundwater limitations for the Plant that will not unreasonably threaten present and anticipated future beneficial uses or result in groundwater quality that exceeds water quality objectives set forth in the Basin Plan.
 56. The Discharger provides treatment and control of the discharge that incorporates:
 - a. Segregation of domestic wastewater from industrial wastewater;
 - b. Wastewater reuse;
 - c. Wastewater settling basins;
 - d. Appropriate solids management practices;
 - e. Blending of wastewater with good quality water for groundwater recharge;
 - f. Preparation and implementation of a Salinity Management Plan; and
 - g. Preparation and implementation of a Land Application Management Plan.These treatment and control practices are reflective of BPTC of the discharge.
 57. This Order imposes effluent and groundwater limitations and requires monitoring to ensure that the highest water quality consistent with the maximum benefit to the people of the State will be achieved while minimizing any degradation that may occur. Depending on monitoring results, this Order will be reopened if necessary to reconsider effluent limitations and other requirements to comply with Resolution 68-16. Based on the existing record, the discharge authorized by this Order is consistent with the antidegradation provisions of Resolution 68-16.

Other Regulatory Considerations

58. In compliance with Water Code section 106.3, it is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This order promotes that policy by requiring discharges to meet maximum contaminant levels designed to protect human health and ensure that water is safe for domestic use.
59. Based on the threat and complexity of the discharge, the facility is determined to be classified as 2B as defined below:
 - a. Category 2 threat to water quality: "Those discharges of waste that could impair the designated beneficial uses of the receiving water, cause short-term violations of water quality objectives, cause secondary drinking water standards to be violated, or cause a nuisance."
 - b. Category B complexity, defined as: "Any discharger not included [as Category A] that has physical, chemical, or biological treatment systems (except for septic systems with subsurface disposal) or any Class 2 or Class 3 waste management units."

60. Title 27 of the California Code of Regulations (hereafter Title 27) contains regulatory requirements for the treatment, storage, processing, and disposal of solid waste. However, Title 27 exempts certain activities from its provisions. Discharges regulated by this Order are exempt from Title 27 pursuant to provisions that exempt domestic sewage, wastewater, and reuse. Title 27, section 20090 states in part:

The following activities shall be exempt from the SWRCB-promulgated provisions of this subdivision, so long as the activity meets, and continues to meet, all preconditions listed:

...

(b) Wastewater - Discharges of wastewater to land, including but not limited to evaporation ponds, percolation ponds, or subsurface leachfields if the following conditions are met:

- (1) the applicable RWQCB has issued WDRs, reclamation requirements, or waived such issuance;
- (2) the discharge is in compliance with the applicable water quality control plan; and
- (3) the wastewater does not need to be managed according to Chapter 11, Division 4.5, Title 22 of this code as a hazardous waste.

...

61. The discharge authorized herein, and the treatment and storage facilities associated with the discharge, are exempt from the requirements of Title 27 as follows:
- a. Discharges to the unlined ponds on the Plant property and to the LAAs are exempt pursuant to Title 27, section 20090(b) because they are discharge of wastewater to land and:
 - i. The Central Valley Water Board is issuing WDRs.
 - ii. The discharge is in compliance with the Basin Plan, and;
 - iii. The treated effluent discharged to the ponds does not need to be managed as hazardous waste.
 - b. Discharge of food processing residual solids to the LAAs is exempt pursuant to Title 27, section 20090(b) because it constitutes use of nonhazardous decomposable waste as a soil amendment and this Order requires implementation of applicable best management practices.
62. Although the discharge is exempt from Title 27, the statistical data analysis methods of Title 27, section 20415(e) are appropriate for determining whether the discharge complies with Groundwater Limitations specified in this Order.
63. The State Water Board adopted Order 97-03-DWQ (NPDES General Permit CAS000001) specifying waste discharge requirements for discharges of storm water associated with industrial activities, and requiring submittal of a Notice of Intent by all affected industrial dischargers. The Discharger is exempt from coverage under NPDES General Permit CAS000001 because all storm water is contained onsite.

64. Water Code section 13267(b) states:

In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge within its region ... shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports, shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those report, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.

The technical reports required by this Order and the attached Monitoring and Reporting Program R5-2015-XXXX are necessary to ensure compliance with these waste discharge requirements. The Discharger owns and operates the facility that discharges waste subject to this Order.

65. The California Department of Water Resources sets standards for the construction and destruction of groundwater wells (hereafter DWR Well Standards), as described in *California Well Standards Bulletin 74-90* (June 1991) and *Water Well Standards: State of California Bulletin 74-81* (December 1981). These standards, and any more stringent standards adopted by the state or county pursuant to Water Code section 13801, apply to all monitoring wells used to monitor the impacts of wastewater storage or disposal governed by this Order.
66. The City of Shafter certified a negative declaration on 7 October 2014 in accordance with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). The negative declaration and initial study describe the project as moving the discharge of carrot wash water from the Minter Field WWTF to LAAs at the North Kern Rosedale recharge project, using the City right-of-way to install a pipeline parallel to Zerker Road, and increasing the discharge flow from 0.300 mgd to 0.700 mgd.
67. The negative declaration, which includes Grimmway's RWD as an attachment, finds that the project will have no impact on groundwater quality. While the discharge has some potential to impact groundwater quality, the Central Valley Water Board concurs with the City's findings to the extent that impacts due to the project would be less than significant. Compliance with this Order will mitigate or avoid significant impacts to water quality.
68. Pursuant to Water Code section 13263(g), discharge is a privilege, not a right, and adoption of this Order does not create a vested right to continue the discharge.

Public Notice

69. All the above and the supplemental information and details in the attached Information Sheet, which is incorporated by reference herein, were considered in establishing the following conditions of discharge.
70. The Discharger and interested agencies and persons have been notified of the Central Valley Water Board's intent to prescribe waste discharge requirements for this discharge, and they have been provided an opportunity to submit written comments and an opportunity for a public hearing.
71. All comments pertaining to the discharge were heard and considered in a public hearing.

IT IS HEREBY ORDERED that Waste Discharge Requirements Order 5-01-140 is rescinded except for purposes of enforcement, and, pursuant to Water Code sections 13263 and 13267, Grimmway Enterprises, Inc., and North Kern Water Storage District, their agents, successors, and assigns, in order to meet the provisions contained in Division 7 of the Water Code and regulations adopted thereunder, shall comply with the following:

A. Discharge Prohibitions

1. Discharge of wastes to surface waters or surface water drainage courses is prohibited.
2. Discharge of waste classified as 'hazardous', as defined in the California Code of Regulations, title 23, section 2510 et seq., is prohibited.
3. Bypass around, or overflow from, the settling/recycling pond(s) is prohibited, except as allowed by Standard Provision E.2 of the *Standard Provisions and Reporting Requirements for Waste Discharge Requirements*.
4. Application of residual solids to the land application areas is prohibited.
5. Discharge of domestic waste to the process wastewater system or facility other than a septic system, regularly serviced portable toilets, or a community sewer system is prohibited.
6. Discharge of waste at a location or in a manner different from that described in the Findings of this Order is prohibited.

B. Flow Limitations

1. The discharge shall not exceed a maximum daily discharge flow of 0.700 mgd or an annual flow of 182 million gallons per year. [Monitored at EFF-002]

C. Effluent Limitations

1. The 12-month rolling average EC of the discharge shall not exceed the 12-month flow weighted average EC of the source water plus 700 umhos/cm. Compliance with this effluent limitation shall be determined monthly based on representative samples from location EFF-002, as identified in MRP R5-2015-XXXX.
2. The discharge (EFF-001) shall not contain total nitrogen (the total mass of nitrogen occurring in any form) in a concentration exceeding 10 mg/L as nitrogen.

D. Discharge Specifications

1. No waste constituent shall be released, discharged, or placed where it will cause violation of the Groundwater Limitations of this Order.
2. Wastewater treatment, storage, and disposal shall not cause pollution or a nuisance as defined by Water Code section 13050.

3. The discharge shall remain within the permitted waste treatment/containment structures and land application areas at all times.
4. The Discharger shall operate all systems and equipment to optimize the quality of the discharge.
5. All conveyance, treatment, storage, and disposal systems shall be designed, constructed, operated, and maintained to prevent inundation or washout due to floods with a 100-year return frequency.
6. Objectionable odors shall not be perceivable beyond the limits of the property where the waste is generated, treated, and/or discharged at an intensity that creates or threatens to create nuisance conditions.
7. As a means of discerning compliance with Discharge Specification C.6, the dissolved oxygen (DO) content in the upper one foot of any wastewater pond on the Plant property shall not be less than 1.0 mg/L for three consecutive weekly sampling events. If the DO in any single pond is below 1.0 mg/L for three consecutive sampling events, the Discharger shall report the findings to the Central Valley Water Board in writing within 10 days and shall include a specific plan to resolve the low DO results within 30 days.
8. The Discharger shall operate and maintain all ponds sufficiently to protect the integrity of containment dams and berms and prevent overtopping and/or structural failure. Unless a California-registered civil engineer certifies (based on design, construction, and conditions of operation and maintenance) that less freeboard is adequate, the operating freeboard in any pond on the Plant property shall never be less than two feet (measured vertically from the lowest possible point of overflow). As a means of management and to discern compliance with this requirement, the Discharger shall install and maintain in each wastewater pond a permanent staff gauge with calibration marks that clearly show the water level at design capacity and enable determination of available operational freeboard.
9. Wastewater treatment, storage, and disposal ponds or structures shall have sufficient capacity to accommodate allowable wastewater flow, design seasonal precipitation, and ancillary inflow and infiltration during the winter while ensuring continuous compliance with all requirements of this Order. Design seasonal precipitation shall be based on total annual precipitation using a return period of 100 years, distributed monthly in accordance with historical rainfall patterns.
10. On or about **1 October** of each year, available capacity shall at least equal the volume necessary to comply with Discharge Specifications 8 and 9.
11. All ponds and open containment structures on the Plant property shall be managed to prevent breeding of mosquitoes. Specifically:
 - a. An erosion control program shall be implemented to ensure that small coves and irregularities are not created around the perimeter of the water surface.

- b. Weeds shall be minimized through control of water depth, harvesting, or herbicides.
 - c. Dead algae, vegetation, and debris shall not accumulate on the water surface.
 - d. The Discharger shall consult and coordinate with the local Mosquito Abatement District to minimize the potential for mosquito breeding as needed to supplement the above measures.
 - e. Vegetation management operations in areas in which nesting birds have been observed shall be carried out either before or after, but not during, the April 1 to June 30 bird nesting season.
12. Newly constructed or rehabilitated berms or levees (excluding internal berms that separate ponds or control the flow of water within a pond) shall be designed and constructed under the supervision of a California Registered Civil Engineer.
 13. Wastewater contained in any unlined pond shall not have a pH less than 6.0 or greater than 9.0.
 14. Additional settling ponds and fines deposition areas may be constructed as needed within the confines of the Plant property as defined on Attachment B.
 15. All stockpiled products shall be managed to prevent erosion that causes discharge of sediment to surface water drainage courses.
 16. Process wash water used for on-site dust control or landscape irrigation shall be used in a manner that will not cause discharge of eroded sediment in storm water runoff to areas not controlled by the Discharger.

E. Groundwater Limitations

Release of waste constituents from any treatment, reuse, or storage component associated with the discharge shall not cause or contribute to groundwater containing constituent concentrations in excess of the concentrations specified below or background quality, whichever is greater:

1. Nitrate as nitrogen of 10 mg/L;
2. For constituents identified in Title 22, the MCLs quantified therein.

F. Land Application Area Specifications

1. Land application of wastewater shall be managed to minimize erosion.
2. The LAAs shall be managed to prevent breeding of mosquitoes.
3. Land application of wastewater at the LAAs shall occur only when appropriately trained personnel are immediately available.

4. The Discharger shall conduct periodic inspections of the LAAs to determine compliance with the requirements of this Order. If an inspection reveals noncompliance or threat of noncompliance with the requirements of this Order, the Discharger shall immediately implement corrective actions. If corrective actions cannot be implemented immediately, then the Discharger shall cease recycled water use in the LAA where the noncompliance is occurring until corrective actions can be implemented.
5. Wastewater application shall be confined to the LAAs and shall not enter any surface water drainage course or storm water drainage system.
6. Discharge of storm water runoff from the LAAs to off-site surface water drainage courses is prohibited.

G. Solids Disposal Specifications

Sludge, as used in this document, means the solid, semisolid, and liquid organic matter removed from wastewater treatment, settling, and storage vessels or ponds. Solid waste refers to solid inorganic matter removed by screens and soil sediments from washing of unprocessed fruit or vegetables. Except for waste solids originating from meat processing, residual solids means organic food processing byproducts such as culls, pulp, stems, leaves, and seeds that will not be subject to treatment prior to disposal or land application.

1. Sludge and solid waste shall be removed from screens, sumps, and ponds as needed to ensure optimal operation and adequate storage capacity.
2. Any handling and storage of sludge, solid waste, and residual solids shall be controlled and contained in a manner that minimizes leachate formation and precludes infiltration of waste constituents into soils in a mass or concentration that will violate the groundwater limitations of this Order.
3. If removed from the site, sludge, solid waste, and residual solids shall be disposed of in a manner approved by the Executive Officer and consistent with Title 27, division 2. Removal for reuse as animal feed, or land disposal at facilities (i.e., landfills, composting facilities, soil amendment sites) operated in accordance with valid waste discharge requirements issued by a Regional Water Board will satisfy this specification.
4. Any proposed change in solids use or disposal practice shall be reported in writing to the Executive Officer at least 90 days in advance of the change.

H. Provisions

1. **By (30 days following adoption of this Order)** the Discharger shall submit documentation for Executive Officer approval that Grimmway is authorized to discharge to the North Kern Rosedale groundwater recharge area in a manner consistent with the discharge described herein. The documentation shall include a description of the roles and responsibilities of each party in a form that clearly demonstrates that all monitoring and reporting can be carried out as required (e.g., site access restrictions will not preclude a party from performing required monitoring).
2. **By (6 months following adoption of this Order)** the Discharger shall submit a Salinity Management Plan for Executive Officer approval describing methods it will use to

determine all sources of salinity in the wastewater and measures it can implement to further reduce wastewater salinity. The Plan shall quantify the mass of salt and the volume of water saved as a result of reusing wastewater in the Plant, and set appropriate goals to minimize the mass of salt discharged from the Plant. The Plan shall include a proposed implementation schedule that the Discharger shall follow upon plan approval by the Executive Officer.

3. **By (6 months following adoption of this Order)** the Discharger shall submit a Land Application Management Plan for the Central Valley Water Board record. The Plan shall discuss all aspects of managing the discharge operation to comply with the terms and conditions of this order, including scheduled rotation of wastewater application to alternate LAAs within the recharge project area, and how to make field adjustments as necessary to preclude nuisance conditions. A copy of the Land Application Management Plan shall be kept at the Plant or LAAs for reference by operating personnel and they shall be familiar with its contents.
4. A discharger whose waste flow has been increasing, or is projected to increase, shall estimate when flows will reach hydraulic and treatment capacities of its wastewater infrastructure. The projections shall be made in January, based on the last three years' average dry weather flows, peak wet weather flows and total annual flows, as appropriate. When any projection shows that capacity of any part of the facilities may be exceeded in four years, the discharger shall notify the Central Valley Water Board by **31 January**.
5. In accordance with California Business and Professions Code sections 6735, 7835, and 7835.1, engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. All technical reports specified herein that contain work plans for investigations and studies, that describe the conduct of investigations and studies, or that contain technical conclusions and recommendations concerning engineering and geology shall be prepared by or under the direction of appropriately qualified professional(s), even if not explicitly stated. Each technical report submitted by the Discharger shall bear the professional's signature and stamp.
6. The Discharger shall submit the technical reports and work plans required by this Order for consideration by the Executive Officer, and incorporate comments the Executive Officer may have in a timely manner, as appropriate. Unless expressly stated otherwise in this Order, the Discharger shall proceed with all work required by the foregoing provisions by the due dates specified.
7. The Discharger shall comply with Monitoring and Reporting Program R5-2015-XXXX which is part of this Order, and any revisions thereto as ordered by the Executive Officer. The submittal dates of Discharger self-monitoring reports shall be no later than the submittal date specified in the MRP.
8. The Discharger shall comply with the "Standard Provisions and Reporting Requirements for Waste Discharge Requirements", dated 1 March 1991, which are attached hereto and made part of this Order by reference. This attachment and its individual paragraphs are commonly referenced as "Standard Provision(s)."

9. The Discharger shall comply with all conditions of this Order, including timely submittal of technical and monitoring reports. On or before each report due date, the Discharger shall submit the specified document to the Central Valley Water Board or, if appropriate, a written report detailing compliance or noncompliance with the specific schedule date and task. If noncompliance is being reported, then the Discharger shall state the reasons for such noncompliance and provide an estimate of the date when the Discharger will be in compliance. The Discharger shall notify the Central Valley Water Board in writing when it returns to compliance with the time schedule. Violations may result in enforcement action, including Central Valley Water Board or court orders requiring corrective action or imposing civil monetary liability, or in revision or rescission of this Order.
10. The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Discharger to achieve compliance with the conditions of this Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems that are installed by the Discharger when the operation is necessary to achieve compliance with the conditions of this Order.
11. The Discharger shall use the best practicable cost-effective control technique(s) including proper operation and maintenance, to comply with this Order.
12. As described in the Standard Provisions, the Discharger shall report promptly to the Central Valley Water Board any material change or proposed change in the character, location, or volume of the discharge.
13. At least **90 days** prior to termination or expiration of any lease, contract, or agreement involving disposal or recycling areas or off-site reuse of effluent, used to justify the capacity authorized herein and assure compliance with this Order, the Discharger shall notify the Central Valley Water Board in writing of the situation and of what measures have been taken or are being taken to assure full compliance with this Order.
14. In the event of any change in control or ownership of the facility, the Discharger must notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be immediately forwarded to the Central Valley Water Board.
15. To assume operation as Discharger under this Order, the succeeding owner or operator must apply in writing to the Executive Officer requesting transfer of the Order. The request must contain the requesting entity's full legal name, the state of incorporation if a corporation, the name and address and telephone number of the persons responsible for contact with the Central Valley Water Board, and a statement. The statement shall comply with the signatory paragraph of Standard Provision B.3 and state that the new owner or operator assumes full responsibility for compliance with this Order. Failure to submit the request shall be considered a discharge without requirements, a violation of the CWC. If approved by the Executive Officer, the transfer request will be submitted to the Central Valley Water Board for its consideration of transferring the ownership of this Order at one of its regularly scheduled meetings.

16. A copy of this Order including the MRP, Information Sheet, Attachments, and Standard Provisions, shall be kept at the discharge facility for reference by operating personnel. Key operating personnel shall be familiar with its contents.
17. The Central Valley Water Board will review this Order periodically and will revise requirements when necessary.

If, in the opinion of the Executive Officer, the Discharger fails to comply with the provisions of this Order, the Executive Officer may refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order may result in the assessment of Administrative Civil Liability of up to \$10,000 per violation, per day, depending on the violation, pursuant to the Water Code, including sections 13268, 13350 and 13385. The Central Valley Water Board reserves its right to take any enforcement actions authorized by law.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

I, PAMELA C. CREEDON, Executive Officer, do hereby certify that the foregoing is a full true, and correct copy of an Order adopted by the California Regional Water Quality Control Board on XX April 2015.

PAMELA C. CREEDON, Executive Officer

Order Attachments:

- A Vicinity Map
 - B Plant Site Map
 - C LAA Site Map
 - D Process Flow Diagram
- Monitoring and Reporting Program R5-2015-XXXX
Information Sheet
Standard Provisions (1 March 1991)