



February 24, 2025

Regional Water Quality Control Board  
Central Valley  
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RE: Comments to TWDRs, Dry Ranch Pistachio Processing Facility

Thank you for the opportunity to comment on the tentative WDRs and MRP for the Dry Ranch Pistachio Processing Facility in Madera County, California. The following are our comments:

WDRs:

1. Pages 26 and 27, E. Performance-Based Salinity Limit.  
*Comment: If the annual average effluent FDS concentration exceeds the performance - based salinity limit, what are the acceptable corrective actions required to be implemented by the Discharger?*
2. Page 29, G.1. BOD<sub>5</sub> cycle average loading limit of 50 lb/ac/day.  
*Comment: Please clarify if this limit is per irrigation block or the entire LAA that is used for the season/year. See our Comment #4 under the MRP comments below.*

*If the limit is per irrigation block, we request that the limit be set to 100 lb/ac/day. This limit is specified in most of the WDRs for facilities with similar operations and hydrogeological settings in the Central Valley. This will also provide flexibility if the BOD<sub>5</sub> concentrations go up significantly from the average concentration of 1760 mg/L. As observed in similar pistachio hulling wastewater, the BOD<sub>5</sub> concentration can go up to as high as 10,000 mg/L on certain years. Furthermore, application of wastewater is only for a short period of time each year.*

MRP:

1. Page 4, B, Table 3: Monitoring of FDS is listed twice, 2/Month and 1/Month.  
*Comment: Which of these frequencies should be followed? 2/Month will be consistent with the other parameters.*

2. Page 7, Table 5 Notes: Note 1 indicates that Wastewater flow is the metered flow of SW-001.

*Comment: This should be EFF-001 instead of SW-001.*

3. Page 8, Table 5 Notes: Note 3 indicates combined loading from wastewater, irrigation water, and precipitation. Note 3 was shown as applicable to the calculated BOD<sub>5</sub>, nitrogen and FDS loadings.

*Comment: Please clarify if the Discharger is required to also analyze precipitation for BOD<sub>5</sub>, Nitrogen and FDS. We request that precipitation be removed as precipitation is not expected to be significant during the pistachio hulling season.*

*Please clarify also if perhaps Note 3 is just for hydraulic loading.*

4. Page 7, Table 5 BOD<sub>5</sub> Loading (for each block) and Cycle average loading rate (see 4 below).

*Comment: Note 4 under Table 5 calculates the pounds of BOD<sub>5</sub> added to the LAA but the mass loading calculation within an LAA on a cycle average on page 10 is for each block. Which cycle BOD<sub>5</sub> needs to be calculated and reported, is it for the entire LAA used or per discrete block? This could impact compliance with the proposed WDR limit of 50 lb/ac/day for cycle BOD<sub>5</sub>.*

5. Pages 11 & 12 of the Annual Monitoring Reports: Items #7 and 18 are the same; 13 and 19 are the same.

*Comment: Please remove #18 & 19.*

6. Pages 9 & 10 of the Annual Monitoring Reports: Items 2b and 16 regarding FDS.

*Comment: We recommend removing Item 2b since monitoring is not monthly, only 2 to 3 months annually. Item #16 will cover the FDS monthly and annual monitoring, and reporting.*

7. Page 11 of the Annual Monitoring Reports: Item #11 "A comparison of monitoring data to the flow limitations proposed in the RWD and an explanation of any violations."

*Comment: Please revise as noted. "A comparison of monitoring data to the flow limitations **specified in the WDR Order R5-2024-XXXX** and an explanation of any violations."*

*Also, should the order be R5-2025-XXXX?*

We appreciate your consideration regarding our comments and if you have any questions, please contact me and/or Dolores Gough with Trinity Consultants.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Seth Kirk', written in a cursive style.

Seth Kirk  
Managing Partner

Cc:

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