CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

(TENTATIVE) MONITORING AND REPORTING PROGRAM ORDER R5-2026-XXXX FOR GOLDEN VALLEY PISTACHIO CO., LLC, NADER MALAKAN, AND MALAKAN INVESTMENTS, LLC. GOLDEN VALLEY PISTACHIO PROCESSING FACILITY MADERA & MERCED COUNTY

This Monitoring and Reporting Program (MRP) Order, which is separately issued pursuant to Water Code section 13267, subdivision (b)(1), establishes monitoring and reporting requirements related to the waste discharges regulated under Waste Discharge Requirements Order R5-2026-XXXX (WDRs Order). Each of the Findings set forth in the WDRs Order, including those pertaining to the need for submission of reports, are hereby incorporated as part of this MRP.

Golden Valley Pistachio Co., LLC owns and operates the Golden Valley Pistachio Processing Facility (Facility). The land where the Facility is located and the land application area (LAA) just southeast of the Facility is owned by Golden Valley Pistachio Co., LLC, and the remaining LAAs are owned by Nader Malakan and Malakan Investments, LLC.

The discharge of process wastewater from the Facility to the LAAs is subject to WDRs Order R5-2026-XXXX. Golden Valley Pistachio Co. LLC and those landowners identified above are referred to, collectively, as Discharger and are responsible for compliance with this Monitoring and Reporting Program (MRP). The Discharger shall not implement any changes to this MRP unless and until the Central Valley Water Quality Control Board (Central Valley Water Board) adopts, or Executive Officer issues, a revised MRP.

A glossary of terms used in this MRP is included on the last page.

Issuance of this MRP effectively terminates and supersedes MRP 93-005, which was previously issued for the Facility. This MRP may be revised by the Executive Officer, in accordance with their delegated authority under Water Code section 13223.

I. GENERAL MONITORING REQUIREMENTS

A. FLOW MONITORING

Hydraulic flow rates shall be measured at the monitoring points specified in this MRP. All flow monitoring systems shall be appropriate for the conveyance system (i.e., open channel flow or pressure pipeline) and liquid type. Flow measurements shall be based on flow meter readings, unless specifically stated otherwise. The method of measurement must be specified. Unless otherwise specified, each flow meter shall be equipped with a flow totalizer to allow reporting of cumulative volume as well as instantaneous flow rate. Flow meters

shall be calibrated at the frequency recommended by the manufacturer; typically, at least once per year and records of calibration shall be maintained for review upon request.

B. MONITORING AND SAMPLING LOCATIONS

Samples and measurements shall be obtained at the monitoring points specified in this MRP. Central Valley Water Board staff shall approve any proposed changes to sampling locations prior to implementation of the change. The Discharger shall monitor the following locations to demonstrate compliance with the requirements of this Order:

Table 1 - Monitoring Locations

Monitoring Location	Monitoring Location Description
SW-001	Source water monitoring
EFF-001	Location where a representative sample of the effluent discharged to the onsite storage tanks may be collected after screening and filtration.
IRG-001	Location where a representative sample of the supplemental irrigation water may be collected.
LAA-001, LAA-002, etc.	1,989-acre land application area.
SOLIDS	Solids Monitoring

C. SAMPLING AND SAMPLE ANALYSIS

All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. Except as specified otherwise in this MRP, grab samples will be considered representative of water, wastewater, soil, solids/sludges and groundwater. The time, date, and location of each sample shall be recorded on the sample chain of custody form.

Field test instruments (such as those used to measure pH, temperature, electrical conductivity [EC], dissolved oxygen [DO], wind speed, and precipitation) may be used provided that:

1. The operator is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated at the frequency recommended by the manufacturer;
3. The instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are submitted as described in the “Reporting Requirements” section of this MRP.

Laboratory analytical procedures shall comply with the methods and holding times specified in the following (as applicable to the medium to be analyzed):

- Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater (EPA);
- Test Methods for Evaluating Solid Waste (EPA);
- Methods for Chemical Analysis of Water and Wastes (EPA);
- Methods for Determination of Inorganic Substances in Environmental Samples (EPA);
- Standard Methods for the Examination of Water and Wastewater (APHA/AWWA/WEF); and
- Soil, Plant and Water Reference Methods for Western Region (WREP 125).

Approved editions shall be those that have been most recently approved for use by the United States Environmental Protection Agency (EPA) or the State Water Resources Control Board (State Water Board), Division of Drinking Water's Laboratory Accreditation Program (ELAP). The Discharger may propose alternative methods for approval by the Executive Officer. Where technically feasible, laboratory reporting limits shall be lower than the applicable water quality objectives for the constituents to be analyzed.

II. SPECIFIC MONITORING REQUIREMENTS

A. SOURCE WATER MONITORING (SW-001)

The source water used for Facility operations shall be monitored. Samples shall be representative of the source water supplied to the Facility after treatment, if any. If the source water is from more than one source, the results shall be presented as a flow-weighted average of all sources. Source water monitoring shall include at least the following:

Table 2 - Source Water Monitoring (SW-001)

Constituent/Parameter	Units	Sample Type	Monitoring Frequency
EC	µmhos/cm	Grab	Annually (see 1 below)
TDS	mg/L	Grab	Annually (see 1 below)
FDS	mg/L	Grab	Annually (see 1 below)
Nitrate (as N)	mg/L	Grab	Annually (see 1 below)
General Minerals	mg/L	Grab	Annually (see 1 below)

1. If source water is obtained from a domestic city supply water, data from annual Consumer Confidence Report is acceptable.

B. EFFLUENT MONITORING (EFF-001)

Effluent samples shall be collected at the onsite storage tanks after treatment (i.e., screening) but prior to being hauled to LAAs. Effluent samples shall be collected during the processing season at any time wastewater is discharged from the Facility. Effluent monitoring shall include at least the following:

Table 3 - Effluent Monitoring

Constituent/Parameter	Units	Sample Type	Monitoring Frequency
Flow	gpd	Metered/Calculated	Continuous
pH	--	Grab	Weekly
EC	µmhos/cm	Grab	Weekly
TDS	mg/L	Grab	2/Month
FDS	µg/L	Grab	2/Month
Potassium	mg/L	Grab	2/Month
BOD_5	mg/L	Grab	2/Month
Nitrate as N	mg/L	Grab	2/Month
TKN	mg/L	Grab	2/Month
Total Nitrogen	mg/L	Grab	2/Month
General Minerals (see 1 & 2 below)	mg/L	Grab	Annually (see 3 below)

1. List of analytes for general mineral analysis is included in the Glossary.
2. For constituents with Secondary MCLs listed in California Code of Regulations Title 22 Table 64449-A (e.g., iron, and manganese), samples shall be filtered with a 1.5-micron filter prior to preservation, digestion, and

analysis. For all other constituents, samples shall be filtered with a 0.45-micron filter prior to preservation, digestion, and analysis.

3. Samples hall be collected once per year in September during the processing season.

C. IRRIGATION WATER MONITORING (IRG-001)

The Discharger shall collect samples of the irrigation water that will be used to irrigate the various field within the available LAAs. Samples of the supplemental irrigation water shall be collected once prior to the start of the processing season each year. Irrigation monitoring shall include at least the following:

Table 4 – Irrigation Water Monitoring

Constituent/Parameter	Units	Sample Type	Frequency
Flow	mgd	Meter	Continuous
EC	µmhos/cm	Grab	Annually
FDS	mg/L	Grab	Annually
Total nitrogen	mg/L	Grab	Annually
General Minerals (See 1 & 2 below)	mg/L	Grab	Annually

1. List of analytes for general mineral analysis is included in the Glossary.

2. For constituents with Secondary MCLs listed in California Code of Regulations Title 22 Table 64449-A (e.g., iron, and manganese), samples shall be filtered with a 1.5-micron filter prior to preservation, digestion, and analysis. For all other constituents, samples shall be filtered with a 0.45-micron filter prior to preservation, digestion, and analysis.

D. LAND APPLICATION AREA MONITORING (LAA-001, ETC.)

The Discharger shall inspect the LAAs at least once daily prior to and during irrigation events. Evidence of erosion, field saturation, runoff, or presence of nuisance conditions (i.e., flies, ponding, etc.) shall be noted in the Facility's logbook and included as part of annual monitoring report. In addition, the Discharger shall perform the following routine monitoring and loading calculations for each discrete irrigation area within the LAAs each day when wastewater is applied. The data shall be collected and presented in graphical (map) and/or tabular format and shall include the following:

Table 5 – Land Application Area Monitoring

Constituent/Parameter	Units	Sample Type	Monitoring Frequency
Fields Irrigated (block Numbers)	acres	--	Daily
Wastewater Flow for Each Block (see 1 below)	gallons	--	Daily
Wastewater Application Loading for each block	inches	Calculated	Daily
Supplemental Irrigation Flow for each block (see 1 below)	mgd	Metered	Daily
Supplemental Irrigation Application Loading for each block (see 1 below)	inches/day	Calculated	Daily
Precipitation	inches	Rain Gauge (see 2 below)	Daily
Total Hydraulic Load for each block (see 3 below)	inches	Calculated	Daily
Total Hydraulic Flow for each block (see 3 below)	mgd	Calculated	Daily
BOD Loading (for each block) (see 4 and 5 below)			
Daily Loading	lbs/acre	Observation	Daily
Cycle average loading rate (see 4 below)	lbs/acre-day	Observation	Cycle
Nitrogen Loading (for each block) (see 4 below)			
From wastewater	lbs/acre/year	Calculated	Annually
From fertilizer/compost	lbs/acre/year	Calculated	Annually
From supplemental irrigation water	lbs/acre/year	Calculated	Annually
Salt Loading (for each block (see 4 below)			
From wastewater	lbs/acre	Calculated	Annually
From supplemental irrigation water	lbs/acre	Calculated	Annually
Field Conditions			

Constituent/Parameter	Units	Sample Type	Monitoring Frequency
Nuisance Odor/Vectors	--	Observation	Weekly
Discharge Runoff	--	Observation	Weekly

1. Wastewater flow is the metered flow of SW-001. Supplemental irrigation water flow is the metered flow of IRG-001.
2. National Weather Service or CIMIS data from the nearest weather station is acceptable.
3. Combined loading from wastewater, supplemental irrigation water, and precipitation water.
4. BOD, nitrogen, and salt loading (TDS and potassium) for each irrigation block shall be calculated as specified in section III of this MRP.
5. A cycle average is calculated by taking the pounds of BOD_5 added to an irrigation block in a given period divided by the sum of the total days wastewater was applied plus the number of days of rest (no application of wastewater or supplemental irrigation water). See section III of the MRP for the calculation.

E. SOLIDS MONITORING (SOLIDS)

The Discharger shall maintain detailed record for the disposal and/or recycling of residual solids removed during the hulling operations. The record should include information on quality, storge, method of disposal (i.e., livestock feed, soil amendments, composting, etc.) and receipts (if applicable). A summary of the information shall be included in the Annual Report.

III. REPORTING REQUIREMENTS

The Discharger must submit all monitoring reports and analytical monitoring results to the State Water Resources Control Board's (State Water Board's) GeoTracker database. GeoTracker is an Internet-accessible database system used by the State Water Board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. This system consists of a relational database, online compliance reporting features, a geographical information system (GIS) interface, and other features that are utilized by regulatory agencies, regulated industries, and the public to input, manage, or access compliance and regulatory tracking data.

GeoTracker Electronic Reporting Requirements: All monitoring reports and monitoring results shall be submitted to GeoTracker in accordance with the timeframes specified below and in searchable Portable Document Format (PDF). The Discharger shall follow the applicable Electronic Submittal of Information (ESI) requirements under the Facility-specific **Global Identification Number**

WDR100029338 at the Geotracker database (https://geotracker.waterboards.ca.gov/esi/login.asp).

In order to submit reports electronically, the Discharger shall create a secure GeoTracker Electronic Submittal of Information (ESI) account and log in credentials, claim their facility by requesting access in GeoTracker, and finally uploading PDF copies of the required reports via the ESI portal as outlined in the GeoTracker ESI Beginner's Guide for Responsible Parties (Beginner's Guide) linked below. The Discharger may complete the above tasks by accessing the 'Getting Started' section on the GeoTracker ESI webpage (https://www.waterboards.ca.gov/ust/electronic_submittal/index.html).

Additional GeoTracker support information can be found at the following:

a. 'Guides/Resources' document link in the "Tools" on the Discharger's GeoTracker ESI account.

b. Resources on the GeoTracker ESI website, such as the Beginner's Guide (https://www.waterboards.ca.gov/ust/electronic_submittal/).

c. General GeoTracker Help Desk contact information:

   Phone: 1-866-480-1028
   Email: geotracker@waterboards.ca.gov

A transmittal letter shall accompany each monitoring report. The letter shall include a discussion of all violations of this MRP and the WDRs Order during the reporting period and actions taken or planned for correcting each violation. If the Discharger has previously submitted a report describing corrective actions taken and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

> *I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, groundwater, etc.), and reported analytical result for each sample are readily discernible. The data shall be summarized in such a manner to clearly illustrate compliance with waste discharge requirements and spatial or temporal trends, as applicable. The results of any monitoring done more

frequently than required at the locations specified in the MRP shall be reported in the next scheduled monitoring report.

Laboratory analysis reports shall be included in the monitoring reports. In addition, all laboratory reports must be retained for a minimum of three years in accordance with Standard Provision C.3. of the SPRRs. For a Discharger conducting any of its own analyses, reports must also be signed and certified by the chief of the laboratory.

Monitoring information shall include the method detection limit (MDL) and the Reporting limit (RL) or practical quantitation limit (PQL). If the regulatory limit for a given constituent is less than the RL (or PQL), then any analytical results for that constituent that are below the RL (or PQL) but above the MDL shall be reported and flagged as estimated.

All monitoring reports that involve planning, investigation, evaluation or design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1.

A. ANNUAL MONITORING REPORTS

Annual Monitoring Reports shall be prepared and submitted to the Central Valley Water Board by the **1st February each year.** The Annual Monitoring Report shall include the following:

1. Results of the **Source Water Monitoring** (SW-001) as specified in Section II.A. If the source water supply is from more than one source, the Discharger shall calculate the flow-weighted average concentration for each constituent monitored (include supporting calculations).

2. Results of the **Effluent Monitoring** as specified in Section II.B, including:

    a. Calculation of the maximum daily flow, monthly average daily flow, and cumulative annual flow for the processing season.

    b. Calculation of the annual average TDS for Monitoring Location EFF-001. Include a comparison of the annual weighted average TDS concentration to the Performance-Based Effluent Limit specified in the WDRs.

3. Results of the **Irrigation Water Monitoring** as specified in Section II.C, including:

a. A map showing the location and identification of the various irrigation areas (blocks).

4. Results of **Land Application Area** monitoring as specified in Section II.D, including:

   a. For the LAA, a chronological log of dates of fertilizer/compost application, residual solids application, irrigation, precipitation, and runoff control operations. Nitrogen and salt loading calculations shall also be included. Nitrogen, potassium and salt content of compost must be determined.

   b. Summary of the inspection activities conducted by the Discharger.

   c. Calculate the cycle average BOD loading rate for the LAA.

      The mass of BOD applied to each discrete irrigation area/block within the LAA on a cycle average basis shall be calculated using the following formula:

$$M = \frac{8.345\,(C\,V)}{A\,T}$$

Where:	*M*	=	Mass of BOD_5 applied to an LAA in lbs/ac/day
	C	=	Concentration of BOD_5 in mg/L based on the average concentration for the Week
	V	=	Total volume of wastewater applied to discrete LAA fields during the irrigation cycle, in millions of gallons
	A	=	Area of the LAA irrigated in acres
	T	=	Irrigation cycle length in days (from the first day wastewater is applied to the last day of the drying time [prior to subsequent application of process wastewater or supplemental irrigation water)
	8.345	=	Unit conversion factor.

   d. Calculate the total mass loading for total nitrogen, and salts (TDS) for each field within LAA.

      The mass of total nitrogen, TDS, and potassium applied to each LAA field/block shall be calculated using the following formula and compared to published crop demand for the crops actually grown:

$$M = \sum_{i=1}^{12} \frac{(8.345(C_i V_i) + M_x)}{A}$$

Where: M = Mass of total nitrogen/TDS/potassium applied to the LAA in lbs/ac/yr
C_i = Average concentration of total nitrogen/TDS/potassium (irrigation and wastewater) for the month in mg/L
V_i = Total volume of irrigation and wastewater applied to the LAA during the month, in million gallons
A = Area of the LAA (i.e., field) irrigated in acres
I = The number of the month (e.g., January = 1, February = 2, etc.)
M_x = Total nitrogen/TDS/potassium mass from other sources (e.g., fertilizer and compost) in pounds
8.345 = Unit conversion factor

5. Results of **Solids Monitoring (SOLIDS)** as specified in Section II.E.

6. Names, title, and contact information for persons to contact regarding the Facility for emergency and routine situations.

7. State certifying when the flow meter and other monitoring instruments and devices were last calibrated, include identification of who performed the calibrations.

8. Calibration records for all flow meters used to demonstrate compliance with the flow limits proposed in the RWD.

9. A calibration log verifying calibration of all hand-held monitoring instruments and devices used to comply with the prescribed monitoring program.

10. A summary of the handling and disposal of solids removed during the hulling operations within the calendar year.

11. A summary of any changes in processing that might affect waste characterization and/or discharge flow rates.

12. The types of crops(s) grown, planting and harvest dates, the quantified nitrogen and fixed dissolved solids uptakes including potassium (as estimated by technical references or, preferable, defined by a representative plant tissue analysis), and a summary of the quantified cycle average BOD loading rate for each block over time.

13. Tabular and graphical summaries of all data collected during the year.

14. A discussion of compliance and corrective actions taken, as well as any planned or proposed actions needed to bring the discharge into full compliance with the WDRs Order.

15. A summary of any changes in processing that might affect waste characterization and/or discharge flow rates.

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 Water Code section 13268. The Central Valley Water Board reserves the 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 Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this MRP, 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 Resources Control 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 (http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided on request.

This MRP replaces MRP No. 93-005 that was issued to the Discharger on 29 January 1993. The Discharger shall begin implementation of the above monitoring program **starting 1 July 2026**.

I, PATRICK PULUPA, Executive Officer, hereby certify that the following is a full, true and correct copy of the Monitoring and Reporting Program R5-2026-XXXX issued by the California Regional Water Quality Control Board, Central Valley Region, on 4 June 2026.

PATRICK PULUPA, Executive Officer

IV. GLOSSARY

BOD_5	Five-day biochemical oxygen demand
$CaCO_3$	Calcium carbonate
EC	Electrical conductivity at 25° C
FDS	Fixed Dissolved Solids
TDS	Total dissolved solids
TKN	Total Kjeldahl nitrogen
SPRR	Standard Provision and Reporting Requirements
Continuous	The specified parameter shall be measured by a meter continuously.
ELAP	Environmental Laboratory Accreditation Program
EPA	Environmental Protection Agency
Daily	Every day
2/Month	Two times per month in non-consecutive weeks
Monthly	Once per calendar month
Quarterly	Once per calendar quarter (e.g., January – March)
Annually	Once per calendar year
mg/L	Milligrams per liter
MRP	Monitoring Reporting Program
MCL	Maximum Contaminant Level
MDL	Method Detection Limit
PQL	Practical Quantitation Limit
µg/L	Micrograms per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day
mgd	Million gallons per day
General Minerals	Analysis shall include; arsenic, alkalinity (as $CaCO_3$) bicarbonate(as$CaCO_3$), boron, calcium, carbonate (as $CaCO_3$), chloride, iron, manganese, magnesium,, phosphate, potassium, sodium, sulfate, and verification that the analysis is complete (i.e., cation/anion balance)
RWD	Report of Waste Discharge
RL	Reporting Limit
WDR	Waste Discharge Requirements