

Central Coast Regional Water Quality Control Board
Prosecution Team Evidence
in the matter of
Cease and Desist Order R3-2016-0015
Exhibit 21

Regional Water Quality Control Board
Central Coast
Attn: Jon Rokke
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
(805) 549-3892



Date: October 15, 2015

Subject: Centrally Grown NOV Response

Dear Mr. Rokke,

The following is an update on the measures that have been taken to rehabilitate the wastewater system at Centrally Grown following the Notice of Violation (NOV) letter received August 7, 2015. An action plan was outlined in a response to the NOV, dated August 21, 2015. A summary of the original action plan is as follows:

August 19, 2015

- Flush effluent pumps.
- Pump out Recirculation Tank.

August 20 – 28

- Check pressure in field daily and flush filter at headworks as necessary.
- Cap first 10 emitter lines in disposal field at low points.
- Add soil to the disposal field in areas where emitters are not buried.

August 31 – September 11, 2015

- Install a minimum of 520 linear feet subsurface Geoflow lines in garden areas to supplement the lines that were capped.
- Install CAT 5 cable to WWTP control panel for off-site monitoring and operation.

September 14 – 18, 2015

- Conduct another site visit w/ Clays and Wallace Group to evaluate system operation.

September 21 – 30, 2015

- Update Action Plan based on information gathered at site visit.

On September 24, 2015 I visited the Centrally Grown site to inspect the wastewater system following scheduled maintenance that was outlined in the original action plan. During the site visit I met with Danielle Ribeira, Centrally Grown's Facilities Manager, and Rafael Ribeira, the Groundskeeper. The two walked me through the site and explained the actions that have taken place to-date and provided me a summary of the current operation of the system.

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Below is a summary of the actions that have taken place between August 21st and September 24th.

- Flush effluent pumps
Centrally Grown staff had Clay's Septic flush the effluent pumps with clear water on August 19th.
- Pump out Recirculation Tank
The recirculation tank was pumped clear and the inside was cleaned on August 19th by Clay's Septic.
- Check pressure in field daily and flush filter at headworks as necessary
Centrally Grown has dedicated staff to check the pressure at the disposal field daily. If the pressure in the disposal field is less than 2 psi, the filter and pumps are checked to make sure they are clean and operating correctly.

CG has found that the filter on the discharge side of the effluent pumps clogs almost daily. Initially grease was infiltrating the filter and causing it to clog. Recently staff have indicated that the material on the filter is fibrous and could be coming from the biofilter pods. In addition, staff is concerned that the filter's automatic backwash is not operating correctly.

It was noted in the meeting that if CG staff continues to have trouble with the filter that Clay's Septic be called to specifically troubleshoot the filter backwash operation to determine if the filter needs to be repaired or replaced. CG staff has initiated getting quotes on a larger filter to replace the existing one.

- Cap first 10 emitter lines in disposal field at low points
Centrally Grown has capped several emitter lines at the low (north) end of the disposal field. This has helped "force" effluent to the higher ends of the disposal field and minimize concentrating the flow at the low end.
- Add soil to the disposal field in areas where emitters are not buried
Exposed emitters were covered with soil to ensure they are discharging below the surface and to prevent surfacing of effluent.
- Install a minimum of 520 linear feet subsurface Geoflow lines in garden areas to supplement the lines that were capped
Centrally Grown has solicited a proposal from Clay's Septic for the installation of the new lines. Due to the extent of this work and the cost associated with installation, Centrally Grown will not be installing these lines prior to the winter season. Instead they plan on re-connecting the capped lines once they are confident the disposal field has been rehabilitated and water is no longer concentrating at the low end of the field.
- Install CAT 5 cable to WWTP control panel for off-site monitoring and operation
Currently the WWTP panel has dial-up internet access so that the equipment manufacturer can quickly identify any alarms or operational issues that may



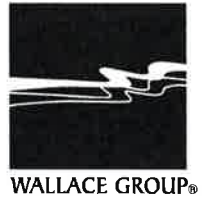
arise in the WWTP facility. However the contract operator for the system, Clay's Septic, does not have the ability to connect via the existing dial-up connection. Therefore, a new CAT5 cable and Ethernet internet connection was to be installed to allow Clay's access to the WWTP panel. Installation of the CAT5 cable was complete as of October 15, 2015. Clay's Septic will be connecting to the WWTP panel in the following week.

- Install permanent fence to replace existing roped off area

Centrally Grown was in the process of installing the permanent fencing at the time of the site visit. A picture of the fencing that is being installed is shown below:



In general the disposal field and wastewater system seemed to be operating better than they had in the past. Clay's septic has been to the site often for monthly operations and maintenance as well as flushing and cleaning equipment that had been inundated with grease. During their visits it was discovered that the 2,500 gallon grease interceptor needs to be pumped monthly as opposed to every three months, as was originally estimated. Pumping the grease out of the interceptor has prevented grease overflow into the wastewater treatment system. Effluent filters were installed on each of the three settling tanks and upon inspection, these filters were clogged to about 20% with grease. Effluent filters were also installed on the



bottom two tanks (Recirculation Tank and Dosing Tank), and when inspected it was discovered that these were 80 to 100% clogged with grease.

Therefore it was concluded that grease is likely still flushing from the system and from the filter pods, but isn't necessarily being generated from the restaurant. Continuously monitoring the equipment, pumping the grease interceptor regularly, and cleaning the filters often so they do not clog is the recommended maintenance for keeping the system free from grease infiltration and preventing a spill, as was experienced in July.

With regard to the disposal field, some surfacing of water still remains in the lowest part of the field. However, there has been a noticeable improvement in the even distribution of effluent across the entire field, relieving the ponding of effluent at the low end. It is suspected that once the effluent filter is repaired or replaced so that even pressure is fed to the disposal field tubing, all surfacing of water will be eliminated. CG staff have noticed that vegetation planted over the field is growing and taking up more effluent, minimizing the amount of water that is percolating down to the soil. CG has also begun mowing the vegetation to further encourage growth and uptake.

Wallace Group will continue to monitor progress of the wastewater system and will plan on doing at least one site visit during the months of November - December. It is recommended that the additional distribution lines be installed by February at the latest, so they are installed and operating well before the busy summer season. The CAT5 internet connection should be installed as soon as possible. In addition, CG should maintain proper function of the effluent filter and either repair or replace it if it continues to clog and prevent even pressure distribution to the field. Filter maintenance should be accomplished within the next month.

If you have any additional comments or questions, feel free to contact me at (805) 544-4011, or Danielle Ribera at Centrally Grown at 209-728-4997.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shannon Jessica".

Shannon Jessica, PE
Wallace Group