

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 24-25 April 2025**

**Response To Written Comments for the
Dry Ranch, LLC; G&G Andrew Farms Tenants in Common; Creekside Farms LP
Tenants in Common; Alkali Hollow Farms, Inc.; and ATB Ranch, LP
Dry Ranch Pistachio Processing Facility
Madera County
Tentative Waste Discharge Requirements**

At a public hearing scheduled on 24-25 April 2025, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of new Waste Discharge Requirements (WDRs) for the Dry Ranch, LLC; G&G Andrew Farms Tenants in Common; Creekside Farms, LP Tenants in Common; Alkali Hollow Farms, Inc.; and ATB Ranch, LP (collectively referred to as Discharger), Dry Ranch Pistachio Processing Facility (Facility) for the discharge of process wastewater to land in Madera County.

This document contains responses to written comments received regarding the tentative WDRs (TWDRs) and Monitoring and Reporting Program (TMRP) circulated on 7 February 2025. Written comments from interested parties were required to be received by the Central Valley Water Board by 5:00 pm on 10 March 2025 to receive full consideration. Comments were received from Dry Ranch, LLC on 24 February 2025.

Written comments are summarized below, followed by responses from Central Valley Water Board staff. In addition, staff made a few minor changes to the TWDRs and TMRP to improve clarity and fix typographical errors identified by staff and the commenter.

Dry Ranch, LLC COMMENTS

Comment #1 (TWDRs): In reference to the proposed Performance-Based Salinity Limit, the Discharger provided the following comment: *If the annual average effluent FDS concentration exceeds the performance-based salinity limit, what are acceptable corrective actions required to be implemented by the Discharger.*

RESPONSE: As discussed in the TWDRs, the Discharger elected to participate in Alternative Salinity Permitting Approach. In lieu of being subject to the Conservative Permitting Approach and corresponding conservative salinity limits, dischargers participating in the Alternative Salinity Permitting Approach are required per the Sacramento and San Joaquin River Basin Plan to, in part, participate in the Prioritization and Optimization Study and maintain current discharge concentrations for salt. As discussed in the TWDRs (Findings 50

and 51), the Performance-Based Salinity Limit is based on the observed average effluent FDS concentrations at the Facility.

Due to the variety of potential causes of an exceedance, it is difficult to specify the appropriate corrective actions to mitigate FDS increases in the discharge. In response to an exceedance of the Performance-Based Salinity Limit, the Discharger should develop and implement specific and measurable corrective actions based on an evaluation of potential underlying causes of salt increases in the discharge. The effectiveness of those actions should be assessed through monitoring. Discussions of corrective actions, as well as any planned or proposed actions needed to bring the discharge into full compliance is required to be provided in Annual Monitoring Reports (TMRP, section III.A.17).

Comment #2 (TWDRs): The commenter requested clarification regarding whether the cycle average biochemical oxygen demand (BOD₅) loading limit of 50 pounds per acre per day (lb/ac/day) is per irrigation block or the entire LAA that is used for the season/year, and provided the following:

If the limit is per irrigation block, we request 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 setting in the Central Valley. This will provide flexibility if the BOD₅ concentrations go up significantly from the average concentration of 1,760 mg/L. As observed in similar pistachio hulling wastewater, the BOD₅ concentration can go up to as high as 10,000 mg/L in certain years. Furthermore, application of wastewater is only for a short period of time each year.

RESPONSE: The cycle average BOD₅ loading limit of 50 lbs/acre/day contemplated in the TWDRs is intended to be calculated by irrigation block. The Discharger provided sample calculations, in a 13 March 2025 email, that demonstrate they may experience some difficulty complying with the 50 lb/acre/day limit should BOD₅ concentrations in the effluent near the maximum observed concentrations (3,500 mg/L). The sample calculations indicate that the Discharger plans and needs to use a substantial portion of the LAA to comply with the cycle average BOD₅ limit and can generally meet a cycle average BOD₅ limit of 100 lbs/acre/day.

According to the California League of Food Processors' *Manual of Good Practice for Land Application of Food Processing/Rinse Water*, BOD₅ loading rates less than 100 lb/acre/day have "minimal risk of unreasonable groundwater degradation with good distribution more important." The Discharger has a land application area (LAA) over 1,500 acres on which to spread wastewater, and the TWDRs require a Wastewater Nutrient Management Plan to be submitted that, in part, describes how wastewater will be applied evenly over the LAA to avoid organic, nutrient, and hydraulic overloading. Furthermore, the TWDRs include LAA Specifications (G.2, G.4, G.5, and G.6), which require application of

wastewater with reasonable uniformity and at reasonable agronomic and hydraulic rates on each individual block, and to the LAA as a whole.

Based on the above, it is reasonable and appropriate to revise the cycle average BOD₅ loading rate limit to 100 lbs/acre/day as calculated by irrigation block, and the TWDRs have been revised to reflect this.

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

RESPONSE: Staff revised Table 3 to specify a minimum FDS monitoring frequency of twice per month (2/month).

Comment #4 (TMRP): The commenter withdrew this comment in a 3 March 2025 email.

Comment #5 (TMRP): *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 BOD₅, nitrogen, and FDS loadings. Please clarify if the Discharger is required to analyze precipitation for BOD₅, 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.*

RESPONSE: Staff revised Table 5 in the MRP and removed reference to Note 3 for BOD₅, nitrogen, and FDS loading monitoring requirements. Additionally, Staff applied Note 3 to Total Hydraulic Flow/Load monitoring requirements in Table 5.

Comment #6 (TMRP): *Page 7, Table 5 BOD₅ Loading (for each block) and Cycle Average loading rate. Note 4 under Table 5 calculates the pounds of BOD₅ 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 BOD₅ needs to be calculated and reported, is it the entire LAA used or per discrete block. This could impact compliance with the proposed WDR limit of 50 lb/acre/day for cycle BOD₅.*

RESPONSE: Cycle average BOD₅, nitrogen, FDS, and hydraulic loading rates should be calculated for each block. Staff revised Notes 4 and 5 to clarify that loading rates are to be calculated based on applications to discrete blocks, and not the entire LAA.

Comment #7 (TMRP): *Pages 11 & 12 of the Annual Monitoring Report: Items #7 and #18 are the same: 13 and 19 are the same. Please remove #18 and #19.*

RESPONSE: Staff revised the TMRP as requested.

Comment #8 (TMRP): *Pages 9 & 10 of the Annual Monitoring Reports: Items 2b and 16 regarding FDS. 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.

RESPONSE: Staff revised the TMRP as follows:

Removed: Calculation of the 12-month rolling average FDS of the discharge for each month of the quarter using the FDS value for that month averaged with the FDS values for the previous 11 months. The average shall only be based on months where there is a measured flow of effluent and the average shall be a weighted average (include supporting calculations). (Formerly TMRP, section III.A.2.b.)

Moved the following language (previously TMRP, section III.A.16) to TMRP, section III.A.2.b:

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

Comment #9 (TMRP): *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.” Please revise as noted. “A comparison of monitoring data to the flow limitations **specified in WDR Order R5-2024-XXXX** and an explanation of any violations.” Also should the order be R5-2025-XXXX.*

RESPONSE: Staff revised the TMRP as requested, and will identify the appropriate WDRs Order number following adoption.