

Maestu, Rafael@Waterboards

Subject: FW: Food Processing Industry WDR Compliance Costs

From: Trudi Hughes [<mailto:Trudi@clfp.com>]

Sent: Monday, March 11, 2013 11:18 AM

To: emily@agcouncil.org; Robert Gore (bob@silentpartnerstrategies.com)

Cc: Oppenheimer, Eric@Waterboards; Rob Neenan

Subject: Food Processing Industry WDR Compliance Costs

Hi Emily and Bob.

Below is a list of WDR compliance costs from the food processing industry that my members have submitted. I hope you find this helpful. Please let me know if you need more information or have any questions.

Thank you.

WDR PERMITS	Low	High	notes
Develop ROWD and File NOI	\$25,000-\$50,000	\$100,000-\$300,000	<ul style="list-style-type: none">• One time cost.• Lower estimates associated with applying for enrollment in General WDRs.• Higher estimates associated with developing a complete ROWD; to produce an anti-degradation analysis if required; and addressing third parties comments on the Tentative Draft WDR.
Provide supplemental info	\$5,000-\$15,000	\$50,000+	
Review and comment on Administrative Draft and Tentative Draft WDRs and participate in hearing	\$1,000 -\$10,000	\$30,000-\$50,000	
Monitoring reports (Salinity and Nutrient Management Plans, Monitoring Wells, etc.)	\$10,000-\$25,000	\$100,000-\$150,000	<ul style="list-style-type: none">• Annual costs.• Lower estimate represent cost of laboratory costs for analytical samples and labor hours.
Studies (Salinity Reduction, Cropping studies, Potential Conduit Reports, etc.)	\$0	\$50,000-\$500,000	<ul style="list-style-type: none">• Annual costs.• Cost associated with provisions of the WDR.

Capital Costs for Regulatory Compliance Upgrades	\$50,000 - \$200,000	\$300,000 - \$500,000	<ul style="list-style-type: none"> • Annual costs. • Cost associated with upgrades to treatment due to findings in WDRs or due to conclusions from studies.
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