



## FALL CREEK ENGINEERING, INC.

Civil • Environmental • Water Resource Engineering and Sciences

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February 3, 2006

Matthew Keeling  
California Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Subject: **Review of Tentative Waste Discharge Requirements – R3-2006-0016**  
**Furtado Dairy, 7955 Ferguson Road, Gilroy, California**

Dear Mr. Keeling:

On behalf of the Furtado Dairy, Fall Creek Engineering, Inc. (FCE) has prepared this letter to provide written comments on the above referenced tentative waste discharge requirements (WDR). In general, the tentative WDR are well written, thorough and appropriate for the facility. At this time FCE has only few comments.

1. Specification 14 requires that the “wastewater ponds shall be lined or underlain by soils that contain at least 10-percent clay and not more than 10-percent gravel, or by artificial materials or equivalent impermeability”. FCE understands that the intent of this specification is to minimize the leakage of wastewater to the underlying shallow groundwater. However, given the age and size of the existing ponds, to determine the characteristics and/or to line the ponds will be a very expensive undertaking. In addition, as observed during the routine groundwater monitoring, the “leakage” of pond water that contains a high content of soluble carbon is creating a reduced groundwater condition and facilitating the denitrification of nitrate under the facility. Therefore, the “leakage” of the pond water may be beneficial to groundwater quality in the vicinity of the dairy.

FCE requests that this specification be revised to state that *in the event the ponds are determined to impact a beneficial use of shallow groundwater, the ponds shall be lined or underlain by soils that contain at least 10-percent clay and not more than 10-percent gravel, or by artificial materials of equivalent impermeability.*

2. FCE request that the Crop/Irrigation Land and Soil Monitoring program be modified. The program requires the Discharger to inspect any cropland on which wastewater is applied. Please describe what the Discharge is intended to inspect in the cropland. The program also requires that representative soils be collected of soil from crop and irrigation disposal areas at least annually. How many samples shall be collected in each area?

Item No. 7 – Attachment No.4  
Furtado Dairy WDR Re-Issuance  
March 24, 2006 Meeting



Thank you for the opportunity to review the tentative order. If you have any questions or comments, please do not hesitate to contact me at (831) 426-9054.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Haase", written in a cursive style.

PETER HAASE, P.E.  
Principal Engineer

Cc: Manual Furtado, Furtado Dairy, Gilroy