



## Central Valley Regional Water Quality Control Board

10 October 2022

Michael Gonzalez  
Boundary Bend Olives, Inc  
455 Harter Ave.  
Woodland, CA 95776

Suzanne Horsley  
via email [horsley.joshua@gmail.com](mailto:horsley.joshua@gmail.com)

**CERTIFIED MAIL**  
**7021 0950 0000 9918 5518**

### **NOTICE OF APPLICABILITY**

**WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR SMALL FOOD PROCESSORS, WINERIES, AND RELATED AGRICULTURAL PROCESSORS WITHIN THE CENTRAL VALLEY REGION  
ORDER R5-2020-0002-0101  
BOUNDARY BEND OLIVES, INC AND SUZANNE HORSLEY;  
BOUNDARY BEND OLIVES LAND APPLICATION AREA SITE NO. 2  
YOLO COUNTY**

On 20 February 2020, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) adopted the Conditional Waiver of Waste Discharge Requirements for Small Food Processors, Wineries, and Related Agricultural Processors within the Central Valley Region, Order R5-2020-0002 (the Waiver). We are in receipt of your Report of Waste Discharge (RWD) submitted on 22 August 2022. Based on the information provided in the RWD, we have determined that the discharge meets the required conditions for approval under the Waiver Tier 3 Category. You are hereby assigned **Order R5-2020-0002-0101**. A copy of the Waiver is enclosed and also available at the [State Water Boards Adopted Orders \(Waivers\) webpage](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/#waivers) ([http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/#waivers](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/#waivers))

You should familiarize yourself with the contents of the Waiver, including the Conditions of Discharge (Waiver Attachment A) and Monitoring and Reporting Program (Waiver Attachment B). Residual solid wastes (pomace, consisting of olive flesh, skins, and pits) must be managed and discharged in accordance with the requirements contained in the Conditions of Discharge and with the information submitted in the RWD.

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

**DISCHARGE DESCRIPTION**

Boundary Bend Olives (Facility) is an olive oil production facility located at 455 Harter Avenue, Woodland in Yolo County. The Facility is owned and operated by Boundary Bend Olives, Inc. (Boundary Bend). Residual solids generated at the Facility are land applied to multiple parcels that are owned by Boundary Bend or Suzanne Horsley. Boundary Bend and Suzanne Horsley are collectively considered the Discharger and responsible for compliance with the Waiver. Tier 3 of the Waiver allows land application of up to 1,000,000 gallons of wastewater per year for irrigation of landscaping or crops and land application of residual solids associated with that volume of wastewater. A minimum of one acre of land application area per 100,000 gallons of discharged wastewater and associated residual solids is required. Any process wastewater or residual solids generated in excess of those amounts must be disposed of off-site at an appropriately permitted facility.

The processing season is from September through December, depending on harvest. Based on information in the RWD, approximately 660,500 gallons of process wastewater and approximately 19,700 wet tons of pomace will be generated during the processing season. It is estimated that approximately 14,500 to 25,000 tons of olive fruit will be processed in the next two years. Process wastewater is discharged to an on-site sump. The sump contents are screened, and the liquid is sent through an oil and grease interceptor before being conveyed to the sewer system that discharges to the City of Woodland Wastewater Treatment Facility (WWTF). Process wastewater discharged to the City’s WWTF is monitored for flow and pH. The screened material (residual solids/pomace) is temporarily collected in an above-ground hopper prior to land application. Residual solids generated varies in moisture content (approximately 60 to 90 percent) and resembles a semiliquid mixture. Residual solids resulting from the generation of 1,000,000 gallons of process wastewater shall be discharged at reasonable agronomic rates in accordance with the Waiver. Any residual solids in excess of those amounts must be disposed of at an appropriately permitted site.

Boundary Bend administers the distribution and application of solids as a soil amendment to land application areas (LAAs) totaling approximately 883 acres located in the Capay and Esparto area in Yolo County. Ownership of the LAAs is summarized in the table below and their locations are shown in **Attachments A and B**.

<b>Boundary Bend Property (Approximately 563 total acres)</b>	<b>Suzanne Horsley Property (Approximately 320 total acres)</b>
061-120-008-000 (159 acres)	061-120-006-000 (320 acres)
049-220-006-000 (263 acres)	---
047-140-047-000 (141 acres)	---

The LAAs will be cropped that may include the production of annual grass for grazing or wheat that is harvested both mechanically and manually. Solids will be distributed using a sealed tank with side chute. Management distribution of the solids including discing

after application and applying solids at low application rates are measures that will be used to reduce nuisance conditions.

## **MONITORING AND REPORTING**

In lieu of Attachment B, Monitoring and Reporting Program of the Waiver, the Discharger shall comply with **Monitoring and Reporting Program (MRP) R5-2022-0814**, which is enclosed. Please review the Monitoring and Reporting Program closely and establish the appropriate record keeping system so that you are able to complete the required Monthly and Annual Monitoring Report.

## **GENERAL INFORMATION AND REQUIREMENTS**

The Waiver includes specific and general conditions with which you must comply. You must maintain control over the discharge and operate in accordance with the information provided in your RWD and this Notice of Applicability (NOA). The land application of wastes is subject to the specific and general conditions, Sections C and D, respectively of the Waiver as it pertains to Tier 3 and this NOA, including the following:

1. Land application of solids for use as dust and erosion control on internal farm roads is prohibited.
2. Waste discharged to the City of Woodland Wastewater Treatment Facility is not subject to the conditions of the Waiver and this NOA.

Please review this NOA carefully to ensure that it completely and accurately reflects the facility name, location, and details of the proposed discharge. Failure to comply with the requirements of the Waiver may result in enforcement action as authorized by provisions of the California Water Code, which could include civil liability. Discharge of wastes not described in the RWD is prohibited. If the method of waste disposal changes from that described in your RWD, you must submit an updated RWD to describe the new operation.

Please note that the current Waiver will expire on **20 February 2025**, after which you must do one of the following:

1. Submit a new NOI with a filing fee (if required) to obtain coverage under a subsequently adopted waiver,
2. Submit a NOI with a filing fee to apply for individual or general Waste Discharge Requirements, or
3. Cease the discharge.

## **SALT AND NITRATE CONTROL PROGRAMS**

As part of the Central Valley Salinity Alternatives for Long Term Sustainability (CVSALTS) initiative, the Central Valley Water Board adopted Basin Plan amendments

(Resolution R5-2018-0034) incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting.

For the Salt Control Program, the Central Valley Water Board issued the Discharger a Notice to Comply (**CV-SALTS ID: 3016**). On 4 November 2021, the Discharger submitted a Notice of Intent and elected to join the Priority and Optimization Study (or P&O Study) under Pathway Option 2. Discharges to the land application areas specified in this NOA are associated with CV-SALTS ID: 3016, which covers land discharges at multiple locations.

For the Nitrate Control Program, the land application areas fall within a Priority 2 Basin. A Notice to Comply will be issued within 2 to 4 years of approval of the Nitrate Control Program, between late 2022 and late 2024 for Priority 2 Groundwater Basins.

More information on the [Salt and Nitrate Control Program](https://www.cvsalinity.org/public-info) may be found on the internet (<https://www.cvsalinity.org/public-info>).

## **DOCUMENT SUBMITTALS**

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to: [centralvalleysacramento@waterboards.ca.gov](mailto:centralvalleysacramento@waterboards.ca.gov).

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or any documentation submitted to the mailing address for this office:

Facility Name: Boundary Bend Olives Land Application Area Site No. 2  
County: Yolo  
Program: Non-15 Compliance  
Order: R5-2020-0002-0101  
CIWQS Place ID: 883144

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to:

Central Valley Regional Water Quality Control Board  
ECM Mailroom  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

Now that the NOA has been issued, the Board's Compliance and Enforcement section will take over management of your case. Brendan Kenny is your new point of contact for any questions about the Waiver. If you find it necessary to make a change to your permitted operations, Brendan will direct you to the appropriate Permitting staff. You may contact Brendan at (916) 464-4635 or at [brendan.kenny@waterboards.ca.gov](mailto:brendan.kenny@waterboards.ca.gov).

for Patrick Pulupa  
Executive Officer

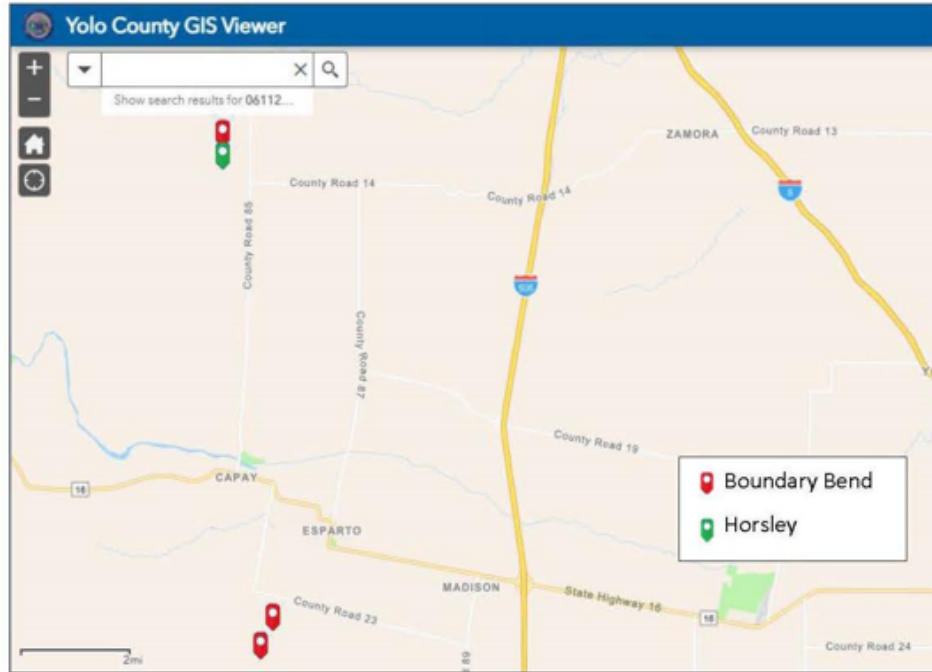
Attachments: Attachment A – Land Application Area Site No. 2 Location Map:  
Overall Property and Boundary Bend North Property  
Attachment B – Land Application Area Site No. 2 Location Map;  
Boundary Bend and Horsley Property  
Monitoring and Reporting Program R5-2022-0814

Encl: Conditional Waiver of WDRs, Order R5-2020-0002 (Discharger only)

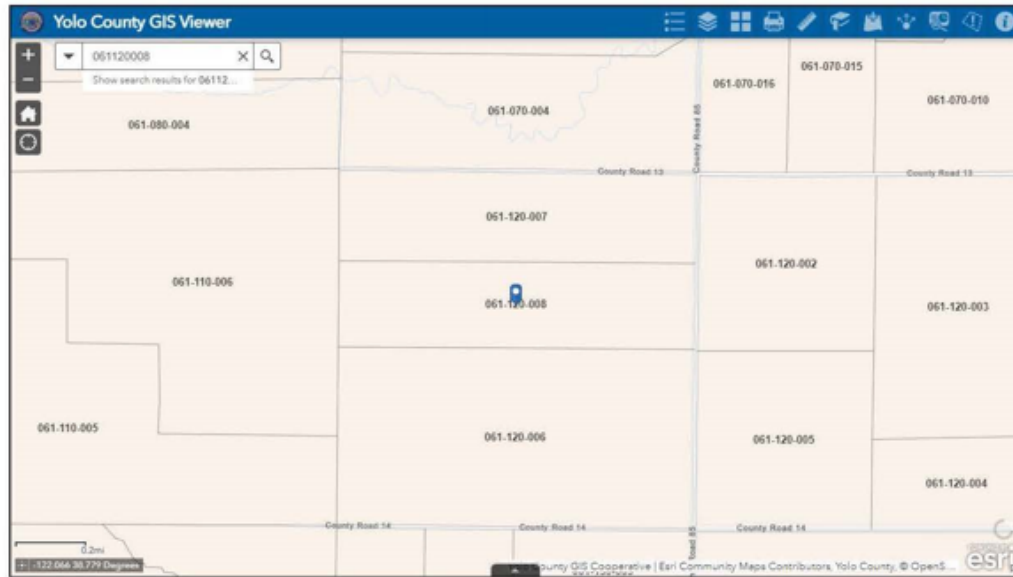
Cc via email: Debbie Anderson, Yolo County Environmental Health Department  
Howard Hold, CVWQCB, Rancho Cordova,  
Brendan Kenny, CVWQCB, Rancho Cordova  
Claudia Street, Boundary Bend Olives, Woodland  
Conor Churchin, Boundary Bend Olives, Woodland  
Ciriaco Chavez, Boundary Bend Olives, Woodland  
Jordan Fricke, Boundary Bend Olives, Woodland

**ATTACHMENT A**

Land Application Area Maps



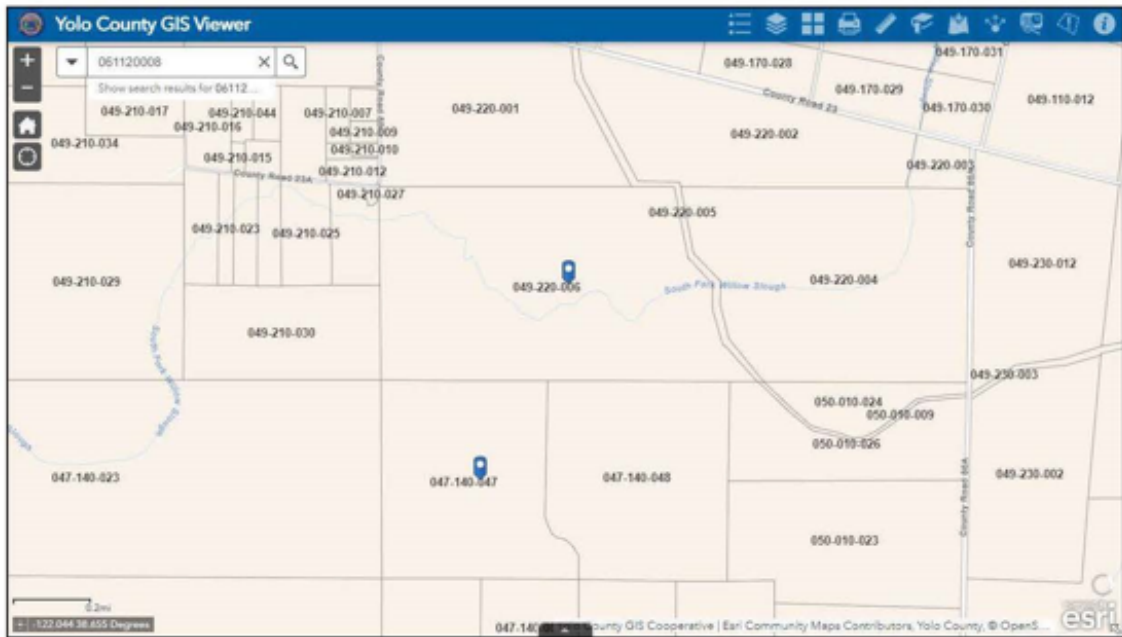
**Map 1. All Properties Overview**



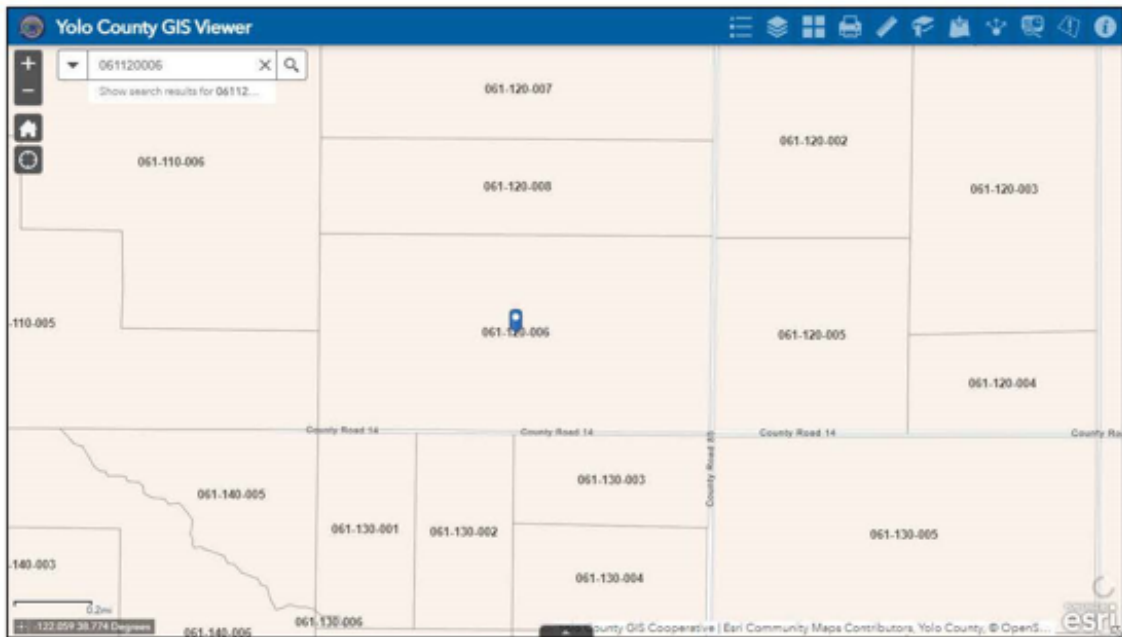
**Map 2. BBO North Property**

<p>Source: Report of Waste Discharge, Aug 2022</p>	<p><b>LOCATION MAP</b> <b>Land Application Area Site No. 2</b> Overall Map and Boundary Bend North Property Yolo County</p>	<p>Approximate Scale: Not to Scale</p>
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**ATTACHMENT B**



**Map 3. BBO South Properties**



**Map 4. Horsley Property**

Source:  
Report of Waste  
Discharge, Aug 2022

**LOCATION MAP**  
**Land Application Area Site No. 2**  
Boundary Bend and Horsley Property  
Yolo County

Approximate  
Scale:  
Not to Scale

Boundary Bend Olives, Inc.  
Memorandum

**TO:** Rob Busby  
Supervising Geologist

**FROM:** Scott Armstrong  
Senior Engineering Geologist  
P.G. #6787, C.H.G. #620

Lani Andam  
Water Resource Control Engineer

**DATE:** 31 August 2022

**APPLICABILITY OF COVERAGE UNDER CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR SMALL FOOD PROCESSORS, WINERIES, AND RELATED AGRICULTURAL PROCESSORS WITHIN THE CENTRAL VALLEY REGION, ORDER R5-2020-0002; BOUNDARY BEND OLIVES LAND APPLICATION AREA SITE NO. 2; YOLO COUNTY**

Central Valley Water Board staff reviewed the Report of Waste Discharge (RWD) submitted on 22 August 2022 for coverage under the Waiver Tier 3 category. The RWD consisted of a Form 200 and technical information form for a Tier 3 facility, which was submitted by Blankinship & Associates, Inc. and prepared by Michael S. Blankinship, a California registered professional engineer. An application fee was received on 31 August 2022. This memorandum provides a summary of Central Valley Water Board staff's review of the RWD and the applicability that the existing discharge is eligible for enrollment under the Waiver.

**DISCHARGE DESCRIPTION**

The Discharger proposes to land apply residual solid wastes (pomace consisting of olive flesh, stems, and pits) generated from their olive oil production operations. Based on the information provided in the RWD, approximately 660,500 gallons of process wastewater and approximately 19,700 wet tons of pomace is anticipated during the processing season. Tier 3 of the Waiver allows land application of up to 1,000,000 gallons of wastewater per year for irrigation of landscaping or crops and land application of residual solids associated with that volume of wastewater. Residual solids resulting from the generation of 1,000,000 gallons of process wastewater shall be discharged at reasonable agronomic rates in accordance with the Waiver. Any residual solids in excess of those amounts must be disposed of at an appropriately permitted site. Waste discharged to the City of Woodland Wastewater Treatment Plant is not subject to regulation under the Waiver.

Boundary Bend Olives, Inc. administers the distribution and application of residual solids; ensures that the application and use of wastes is suitable for a direct beneficial use and not disposal; and will properly manage and handle the application operations to minimize nuisance conditions and prevent discharges into wetlands, surface waters, or surface water drainage courses. The LAAs will be cropped including the use for the



production of annual grass for grazing or cropped with wheat. Application areas that harvest a crop is considered best practicable treatment and control. Crops can take up nutrients (nitrogen), salinity, and various dissolved minerals found in the discharge, that could impact groundwater. Based on the Manual of Good Practice for Land Application of Food Processing/Rinse Water, typical salt removal for winter wheat is approximately 1,321 pounds per acre per year (lb/ac/yr). Nitrogen removal for forage crops can vary from 115 to 600 lb/ac/year. The Discharger will manage the waste including discing after application and applying at low application rates to reduce nuisance conditions. Best management practices will be performed to prevent the runoff of the waste and/or leachate off-site or into any surface water body. Based on these conditions and the available application areas, the waste meets the conditions for regulatory coverage under the Waiver.

The Discharger has proposed waste application for use as dust and erosion control on internal farm roads. Section C.16.e Specific Conditions of the Waiver allows the use of grape stems or other dry, non-putrescible matter (e.g., dry nut hulls) that have been segregated from the rest of the residual solids to be applied to the Discharger's property, including dirt roads, for erosion or dust control. However, the matter must be dry and non-putrescible. The Discharger has not provided additional information regarding use of the waste as dust and erosion control. Therefore, solids use as dust and erosion control on internal farm roads is prohibited.

The Discharger has plans to expand their operations, which would increase solids production and are exploring other alternatives to solids management, including pond use. In anticipation of this expansion, additional monitoring data is necessary to characterize the discharge. Therefore in lieu of the Monitoring and Reporting Program of the Waiver, a site-specific Monitoring and Reporting Program is being issued.