

From: Richard Ross
To: [Prat, Rachel@Waterboards](mailto:Prat.Rachel@Waterboards.org); [NorthCoast](#)
Cc: [Sam Cropper](#); [Charles Schiele](#)
Subject: Virginia Dare Winery - Draft WDR Comments
Date: Monday, August 14, 2017 4:35:23 PM
Attachments: [Draft WDR comments_170814.pdf](#)

Rachel,

See attached for comments on the draft WDR. You will see various comments in red and blue text throughout the document. Big picture summary is as follows:

1. Desire to remove language regarding septic tank maintenance as there isn't one present and we wouldn't want things to get too confusing trying to track an element that doesn't exist
2. Desire to remove nitrate monitoring as a constituent for compliance. For T22 recycled water, there is typically no requirement to meet specific nitrate concentrations and usually only applies to monitoring wells and diluent water. Even if the facility did want to use well water as diluent water (normally not needed as there is too much process wastewater), the test submitted (6.1 mg/L) in the T22 engineering report showed the facility is under the proposed 10 mg/L level but it's just one more thing to monitor for and should not be an ongoing testing cost born by the facility. Winery process wastewater typically has very low nitrate concentrations and is significantly more flow than the domestic wastewater flows generated onsite. In addition, the facility is bound by antidegradation policy requirements within the WDR's (section G) which would apply should there be an atypical presence of high nitrate concentration from the discharged effluent which threaten groundwater sources.
3. Desire to retain the 1' freeboard requirement that is present in the current WDR's. This provides more flexibility in managing pond operations.

Please let me know if there are any questions on the attached comments. We would be happy to meet at your office if you would like.

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