



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Mar 30, 2005

Certified Mail 7000 0520 0021 6108 9823

RETURN RECEIPT REQUESTED

In Reply Refer To: CWA-307-9-05-035

Gene Dodson, Vice President, Operations  
Sunsweet Growers, Inc.  
901 North Walton Avenue  
Yuba City, California 95993

Dear Mr. Dodson:

Last year in our inspection report, we raised a number of concerns regarding the strength, toxicity, and impact of the process wastewater discharges from Sunsweet Growers to the Yuba City sewers. Your responses to our follow-up self-monitoring order answered our main concerns regarding the wastewater strength, as well as other concerns regarding disinfection and steam condensate toxicity. We now agree with you that an alkalinity demand study and further monitoring for disinfectants and anti-fouling additives are not needed.

However, some concerns remain. In particular, the self-monitoring required by the follow-up order also substantiated concerns regarding pH and iron. As a result, the enclosed administrative order issued today requires Sunsweet Growers to achieve consistent compliance with its sewer discharge limits for pH, and iron, as well as with permit limits for discharge flow rate, and suspended solids. This order also extends some self-monitoring requirements for one more year. The key dates are as follows:

KEY DATES	ADMINISTRATIVE ORDER CWA-307-9-05-035
06/28/04	1,4 Submit preliminary engineering plans of corrective actions
09/28/05	3 Submit progress report regarding pH control 5 Complete corrective actions for iron, TSS, and flow violations
12/28/05	2 Complete corrective actions for pH violations.
06/01/04	6-10 Continue one year of self-monitoring under this Order Monthly sampling for iron Monthly summaries of pH, discharge flow rate, TSS, and BOD
05/31/05	End self-monitoring under this Administrative Order.
* * *	Self-monitoring reports are due on the 28 <sup>th</sup> day of each month for the samples collected during the previous month.

Compliance with pH and iron limits will require corrective actions. The pH limit of 5.0 s.u. derives from the Federal national prohibitions in 40 CFR §403.5 that apply all of the time

nationwide to every industrial sewer discharge nationwide. The iron limit is a local limit that applies all of the time to all dischargers into the Yuba City sewers. The daily-maximum discharge flow rate limit and a second pH limit of 8.5 s.u. for no more than 1% of the time are limits specific to Sunsweet Growers. We recognize that a compliance plan for site-specific local limits might involve re-evaluation of the permit limits and re-permitting by Yuba City.

This Finding of Violation and Administrative Order is issued pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act (“the Act”) as amended [33 U.S.C. § 1318(a) and 1319(a)(3), (a)(4), and (a)(5)(A)]. Any violation of the terms of this Order or pretreatment standards could subject Sunsweet Growers to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. § 1319(b)] and/or penalties under Section 309(d) of the Act [33 U.S.C. § 1319(d)] of up to \$31,500 per day of violation. In addition, under Section 309(g) of the Act [33 U.S.C. § 1319(g)], any violation of the pretreatment standards could also subject Sunsweet Growers to an administrative penalty action of up to \$12,000 per day of violation not to exceed \$157,000. Sections 309(c)(1), (c)(2), and (c)(4) of the Act [33 U.S.C. § 1319(c)(1), (c)(2), and (c)(4)], also provide penalties for negligent violations, knowing violations and knowingly making false statements.

If you have any questions regarding this matter, please contact Greg V. Arthur of my staff at (415) 972-3504 or at [arthur.greg@epa.gov](mailto:arthur.greg@epa.gov).

Sincerely,

*Original signed by:  
Alexis Strauss*

Alexis Strauss  
Director, Water Division

Enclosure

cc: Aaron J. Winer, Yuba City  
Melissa Hall, RWQCB-Sacramento

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 9

In the Matter of	)	
	)	
Sunsweet Growers, Inc.	)	FINDING OF VIOLATION
Yuba City, California	)	
	)	AND ORDER
Proceedings under Section 308(a) and 309(a)(3),	)	
(a)(4) and (a)(5)(A) of the Clean Water Act, as	)	Docket No. CWA-307-9-05-035
amended, 33 U.S.C. Section 1318(a) and	)	
1319(a)(3), (a)(4) and (a)(5)(A)	)	

**STATUTORY AUTHORITY**

The following Finding of Violation and Order (Docket No. CWA-307-9-05-035) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) pursuant to Sections 308(a) and 309(a)(3), (a)(4), and (a)(5)(A) of the Clean Water Act [33 U.S.C. § 1318(a) and 1319(a)(3), (a)(4), and (a)(5)(A)] (hereinafter “the Act”). This authority has been delegated by the Administrator and the Regional Administrator of EPA Region 9 to the Director of the Water Division of EPA Region 9.

**FINDING OF VIOLATION**

The Director of the Water Division of EPA Region 9 finds that Sunsweet Growers, Inc., in Yuba City, California, is in violation of Section 307(d) of the Act [33 U.S.C. § 1317(d)]. This Finding is made on the basis of the following facts.

1. Section 307(d) of the Act [33 U.S.C. § 1317(d)] prohibits any owner or operator of any source from introducing pollutants into publicly owned treatment works (“POTWs”) in violation of any effluent standard or prohibition or pretreatment standard promulgated under Section 307 of the Act:

2. Under Section 307(b) of the Act [33 U.S.C. § 1317(b)], EPA promulgated the following general pretreatment regulations:
  - a. The national pretreatment standards in 40 CFR 403.5(b)(2) for all industrial dischargers into POTWs nationwide, which prohibit the introduction of pollutants that will cause corrosive structural damage to the POTW, and in no case have a pH below 5.0 s.u.;
  - b. The national pretreatment standards in 40 CFR 403.5(b)(4) for all industrial dischargers into POTWs nationwide, which prohibit the introduction of any pollutant, including oxygen demanding pollutants at a flow rate and/or pollutant concentration which will cause Interference with the POTW;
  - c. The national pretreatment standards in 40 CFR 403.5(d) for all industrial dischargers into the Yuba City domestic sewer system and wastewater treatment plant, which defines local limits developed in accordance with the 40 CFR 403.5(c) to be Pretreatment Standards for the purposes of Section 307(d) of the Act [33 U.S.C. § 1317(d)];
  - d. The definitions in 40 CFR 403.3 of the following terms:
    - i. The term, Interference, means a discharge which, alone or in conjunction with discharges from other sources, both inhibits or disrupts the POTW's treatment process, operations, sludge processes, or sludge use or disposal, and therefore causes a violation of any requirement of the POTW's NPDES permit;
    - ii. The term, Pass-Through, means a discharge which exits the POTW into waters of the United States at levels, alone or in conjunction with other

sources, and therefore causes a violation of any requirement of the POTW's NPDES permit;

- iii. The term, Pretreatment Standards, means any regulation containing pollutant discharge limits promulgated by EPA in accordance with Section 307 (b) and (c) of the Act, [33 U.S.C. § 1317(b) and (c)], including the specific prohibitions and local limits established pursuant to 40 CFR 403.5(b) and (d).

- 3. Sunsweet Growers is a corporation and therefore a person within the meaning of Section 502(5) of the Act, [33 U.S.C. § 1362(5)]. Sunsweet Growers is a non-domestic wastewater source in Yuba City, California. Sunsweet Growers introduces pollutants within the meaning of Section 502(6) of the Act [33 U.S.C. § 1362(6)], into the Yuba City domestic sewer system and wastewater treatment plant, which is a POTW within the meaning of Section 307(b) and the pretreatment regulation in 40 CFR 304.3(o). Sunsweet Growers is therefore subject to the provision of the Act, [33 U.S.C. § 1251 et seq., including Section 307, 33 U.S.C. § 1317].
- 4. On August 20, 2003, EPA inspectors and a representative of Yuba City conducted a compliance evaluation inspection of Sunsweet Growers:

- a. Facility Description: Sunsweet Growers owns and operates a dried fruit processing plant and a drink bottling plant at 901 North Walton Street in Yuba City:
  - i. The dried fruit processing plant generates for discharge to the sewers, single-pass cooling water, plant and equipment washdown, conveyor belt

lube water, mop water, fruit wash water, steam condensate, pitting spray washdown, drainage, and preservative spents;

- ii. The drink bottling plant generates for discharge to the sewers, plant and equipment washdown, bottle washout, single-pass cooling water, product change-out cleaning, steam condensate, clean-in-place washdown, reverse osmosis reject, and conveyor belt lube water;
- iii. The Calpine Greenleaf Unit 2 cogeneration plant located next door produces chemically conditioned steam used by Sunsweet Growers.

b. Wastewater Discharges to the Sewer: Sunsweet Growers discharges process-related wastewaters into the domestic sewers which feed into the Yuba City wastewater treatment plant for discharge into the Feather River:

- i. Process-related wastewaters discharge through one sewer connection into the Yuba City sewers under Yuba City permit No. 03-2;
- ii. Process-related wastewaters collected in one main and two small sumps which all feed together through screening and pH adjustment for discharge to the sewers;
- iii. The only wastewater treatment performed on-site is microscreening and single-stage pH adjustment;
- iv. The discharges of process-related wastewater to the sewers is continuously monitored for pH and flow at a compliance sampling point designated in the EPA inspection report, follow-up self-monitoring order, and this Order as IWD-LOC1. The sampling station also incorporates a permanent automatic composite sampler.

- c. Pretreatment Standards: The following national prohibitions, and local limits apply to the discharges to the Yuba City sewers from Sunsweet Growers:

Regulated Parameters and Pollutants *	Nat'l Prohib Instant-Max	Local Limits	
		Instant-Max	Month-Max
pH minimum	5.0 s.u.	5.0 s.u.	8.5 s.u. (<446 min/mo)
discharge flow rate	-	1,500,000 gpd	1,250,000 gpd
suspended solids	-	6,000 lbs/d	4,000 lbs/d
iron	-	5.0 mg/l	-
Compliance Sampling point	IWD-LOC1 for all national prohibitions and local limits		

\* The Yuba City permit and ordinance set limits for other pollutants including biochemical oxygen demand, toxic metals, toxic organics, and oil & grease.

- d. Inspection Report: The report for the August 20, 2003 inspection was prepared on February 20, 2004 and issued on April 20, 2004.
5. Sunsweet Growers violated Section 307(d) of the Act [33 U.S.C. § 1317(d)] in that:
- a. On April 20, 2004, EPA issued a self-monitoring order, Docket No. CWA-308-9-04-030, under the Section 308 (a) of the Act [33 U.S.C. § 1318(a)], which required Sunsweet Growers to conduct one year of self-monitoring beginning on June 1, 2004. The self-monitoring order involved the following requirements:
    - i. Monthly 24-hour composite monitoring for iron and suspended solids loading;
    - ii. Monthly summaries of continuous pH meter strip charts;
    - iii. Monthly summary of daily discharge flow rates;
    - iv. Monthly summary of biochemical oxygen demand loadings.

- b. Sunsweet Growers submitted the self-monitoring required by EPA's April 20 2004 self-monitoring order for June 2004, July 2004, August 2004, September 2004, October 2004, November 2004, December 2004, and January 2005.
- c. From June 2004 through January 2005, the discharges from Sunsweet Growers through IWD-LOC1 to the Yuba City sewers did not comply with national prohibitions and local limits on at least 56 occasions resulting in 293 days of violation:
  - i. pH violations account for 271 days of violation;
  - ii. Iron violations account for 3 days of violation;
  - iii. Total suspended solids violations account for 1 day of violation;
  - iv. Discharge flow rate violations account for 18 days of violation.

Summary tables of the violations are included in Appendix A of this Order.

- 6. The inspection report issued on April 20, 2004 of the August 20, 2003 EPA inspection of Sunsweet Growers is by reference made part of this Finding of Violation and Administrative Order.



### ADMINISTRATIVE ORDER

Taking these Findings into consideration and considering the potential environmental and human health effects of the violations and all good faith efforts to comply, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to Section 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Act [33 U.S.C. § 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)], IT IS HEREBY ORDERED that Sunsweet Growers comply with the following requirements:

#### *pH Control*

1. By **JUNE 28, 2005**, Sunsweet Growers shall submit a preliminary engineering plan of the steps to be taken in order to consistently comply with the national prohibition and local permit limits for pH. This preliminary engineering plan shall include:
  - a. A detailed description of the pH control system in-place. This description shall include the following:
    - i. A written explanation of the design and operation of the pH control system, including the stages of pH control, the reagents in use, and the conceptual theory behind the pH control;
    - ii. A written description of the pH control instrumentation, including the type and number of pH electrodes, the type of pH controllers, and the methods of tuning, calibrating, and conducting routine maintenance;
    - iii. A schematic of the pH control system, including all wastewater piping, wastewater tankage, equalization, sumps, reagent tanks, pH controllers, mixers, control valves, reagent feed lines, and measurement points.

- b. A determination of the cause(s) of the violations of the national prohibition against discharges with pHs below 5.0 s.u. at any time, and of the local permit limit prohibiting discharges with pHs below 8.5 s.u. for more than 443 minutes per calendar month;
  - c. A description of the corrective actions to be taken in order to consistently comply with the national prohibition and local permit limits for pH. This description shall include the following:
    - i. A written explanation of each corrective action to be taken;
    - ii. A written explanation of the resulting design, operation, and instrumentation of the proposed pH control system, including the stages of pH control, the reagents in use, the conceptual theory behind the pH control, the type and number of pH electrodes, the type of pH controllers, and the methods of tuning, calibrating, and conducting routine maintenance;
    - iii. A schematic of the proposed pH control system, annotated to show all corrective actions to be taken;
  - d. A schedule of corrective action to be taken that does not extend past December 28, 2005.
2. By **SEPTEMBER 28, 2005**, Sunsweet Growers shall submit a progress report regarding the corrective actions to consistently comply with pH limitations, as required by item 1 of this Order.

3. By **DECEMBER 28, 2005**, Sunsweet Growers shall complete the corrective actions to consistently comply with pH limitations, as required by item 1 of this Order, and submit a notice of completion.

*Iron, Suspended Solids, and Discharge Flow Rate*

4. By **JUNE 28, 2005**, Sunsweet Growers shall submit a preliminary engineering plan of the steps to be taken to consistently comply with the local limits for iron, and the local permit limits for total suspended solids, and discharge flow rate. This preliminary engineering plan shall include the following:
  - a. A determination of the cause(s) of the violations of the local limit for iron;
  - b. A determination of the cause(s) of the violation of the local permit limit for daily-maximum total suspended solids loading;
  - c. A determination of the cause(s) of the violations of the local permit limit for daily-maximum discharge flow rate;
  - d. A description of the corrective actions to be taken in order to consistently comply with the local limit for iron, and the local permit limits for total suspended solids, and discharge flow rate;
  - e. A schedule of corrective actions to be taken that does not extend past September 28, 2005.
5. By **SEPTEMBER 28, 2005**, Sunsweet Growers shall complete the corrective actions to consistently comply with iron, suspended solids, and discharge flow rate limitations, as required by item 3 of this Order, and submit a notice of completion.

*Self-Monitoring Requirements*

6. From **JUNE 1, 2005 THROUGH MAY 31, 2006**, Sunsweet shall self-monitor the wastewater discharges to the sewers at the compliance point designated in this Order as IWD-LOC1 in accordance with the following sampling schedule:
- a. **ONCE EVERY MONTH**, Sunsweet shall self-monitor for iron;
  - b. **ONCE EVERY MONTH**, Sunsweet shall summarize the continuous pH meter strip charts to reflect the following:
    - i. The number of minutes each day in which the pH is below 2.0;
    - ii. The number of minutes each day in which the pH is below 5.0;
    - iii. The number of minutes each day in which the pH is below 6.5;
    - iv. The number of minutes each day in which the pH is below 8.5;
    - v. The number of minutes each day in which the pH is above 12.5.
  - c. **ONCE EVERY MONTH**, Sunsweet shall report the discharge flow rate, and the daily-average concentrations and loadings for BOD and total suspended solids for each day.
7. Sunsweet shall self-monitor and analyze using the sampling protocols and EPA approved analytical methods (or equivalent) to achieve the listed detection limits indicated below:

Parameters	Sampling Protocols	Req'd Detection Limits
flow rate	continuous flow meter or meter reading	-
iron	24-hour flow-weighted composite	0.1 mg/l
pH	continuous meter	0.1 s.u.
TSS	24-hour flow-weighted composite	5 mg/l
BOD	24-hour flow-weighted composite	5 mg/l

8. The sewer sampling of the discharges required in item 6 of this Order shall be representative of the overall discharge to the Yuba City sewers at the compliance sampling point IWD-LOC1, unless EPA approves a new sample point or points.

*Submissions*

9. By the **TWENTY-EIGHTH (28<sup>th</sup>) DAY OF EACH MONTH**, Sunsweet shall submit all self-monitoring results for the previous month. The first monthly report is due on July 28, 2005 for the June 2005 self-monitoring. The 12<sup>th</sup>-and-last monthly report is due on June 28, 2006 for the May 2006 self-monitoring.
10. For each sample, Sunsweet shall record the sample results, the EPA analytical methods used, the date, time and location of sampling, the type of sampling (ie. 24-hour composite or grab), and the name of the laboratory used.
11. All reports submitted pursuant to this Order shall be signed by a principal executive officer of Sunsweet and shall include the following statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that all wastewater samples analyzed and reported herein are representative of the ordinary process wastewater flow from this facility. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

12. All submissions shall be mailed to the following addresses:

U.S. ENVIRONMENTAL PROTECTION AGENCY  
75 Hawthorne Street  
San Francisco, California 94105  
Attn: Greg V. Arthur (WTR-7)

REGIONAL WATER QUALITY CONTROL BOARD  
11020 Sun Center Drive, No. 200  
Rancho Cordova, California 95670  
Attn: Melissa Hall

CITY OF YUBA CITY  
302 Burns Drive  
Yuba City, California 95991  
Attn: Aaron J. Winer

*General Provisions*

13. This Administrative Order is not and shall not be interpreted to be a National Pollutant Discharge Elimination System permit under Section 402 of the Act, [33 U.S.C. § 1342], nor a local industrial user permit under 40 CFR Part 403.8(f)(iii). In addition, this letter shall not in any way extinguish, waive, satisfy, or otherwise affect Sunsweet's obligation to comply with the Act or its regulations, as well as any other Federal, State or local law, including the sewer use ordinance for the City of Yuba City.
14. The request for information included in this Order is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an "collection of information" within the meaning of 44 U.S.C. § 3502(3) and 5 CFR § 1320.5(c) because it is directed to fewer than ten persons. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is an administrative action against a specific entity [44 U.S.C. § 3518(c)(1)(B) and 5 CFR § 1320.4(a)(2)].

15. EPA has promulgated regulations to protect the confidentiality of the business information it receives. These regulations are set forth in 40 CFR Part 2, Subpart B and in the Federal Register at 41 F.R. 36902 (9/1/1976) and 43 F.R. 40000 (9/8/1978). A claim of business confidentiality may be asserted in the manner specified by 40 CFR § 2.203(b) for part or all of the information requested. EPA will disclose business information covered by such a claim only as authorized under 40 CFR Part 2, Subpart B. If no claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice. Sunsweet Growers may not withhold from EPA any information on the grounds that it is confidential.
16. This Order takes effect upon signature.

Mar 30, 2005

\_\_\_\_\_  
Date

*Original signed by: Alexis Strauss*

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Alexis Strauss  
Director  
Water Division

Appendix A  
Violations of Local Limits and National Prohibitions

Sunsweet Growers, Yuba City pH Violations from June 2004 through January 2005					
Sampling * Date	Type	Sampler	National Prohibition or Local Limit	Violation	Days of Violation
Jan 2005	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	2223 min	31
12/15/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
12/14/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
12/09/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
12/08/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
Dec 2004	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	1338 min	31
11/12/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
11/04/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
Nov 2004	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	1939 min	30
10/11/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
10/05/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
10/04/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
Oct 2004	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	914 min	31
09/30/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
09/20/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
Sep 2004	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	1097 min	30
08/25/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
08/11/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
Aug 2004	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	852 min	31
07/16/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
07/12/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
07/07/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
07/01/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
Jul 2004	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	977 min	31
06/30/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/29/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/25/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/24/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/23/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/21/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/11/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/10/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
06/09/04	cont	Sunsweet	pH minimum < 5.0 s.u.	< 5.0 s.u.	1
Jun 2004	cont	Sunsweet	pH lower limit < 8.5 s.u. for > 446 min	1805 min	30
* From self-monitoring submitted under the requirements of CWA-308-09-04-030.				Totals	271



Appendix A (continued)  
Violations of Local Limits and National Prohibitions

Sunsweet Growers, Yuba City Iron and Suspended Solids Violations from June 2004 through January 2005					
Sampling * Date	Type	Sampler	Local Limit	Violation	Days of Violation
10/24/04	24-h	Sunsweet	Fe local limit 5.0 mg/l	22.0 mg/l	1
09/24/04	24-h	Sunsweet	Fe local limit 5.0 mg/l	45.0 mg/l	1
07/21/04	24-h	Sunsweet	Fe local limit 5.0 mg/l	43.0 mg/l	1
07/01/04	24-h	Sunsweet	TSS d-max local limit 6,000 lbs/day	14,169	1
* From self-monitoring submitted under the requirements of CWA-308-09-04-030.				Totals	4

Sunsweet Growers, Yuba City Discharge Flow Rate Violations from June 2004 through January 2005					
Sampling * Date	Type	Sampler	National Prohibition or Local Limit	Violation	Days of Violation
01/31/05	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,583,900	1
01/24/05	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,509,400	1
01/18/05	cont	Sunsweet	Flow d-max 1,500,000 gpd	2,457,600	1
01/10/05	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,914,000	1
12/30/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	3,066,500	1
11/29/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	2,609,200	1
11/12/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,753,500	1
10/18/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	2,486,800	1
09/22/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	2,175,800	1
09/07/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,634,000	1
08/23/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,617,924	1
08/02/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,774,300	1
07/26/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,567,700	1
07/12/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,847,900	1
06/21/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	2,287,500	1
06/15/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	2,307,600	1
06/07/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,802,700	1
06/01/04	cont	Sunsweet	Flow d-max 1,500,000 gpd	1,860,800	1
* From self-monitoring submitted under the requirements of CWA-308-09-04-030.				Totals	18