

**Comments on the January 2017 DEIR Crystal Geyser (CG) Bottling Plant Project
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The following comments address three areas: hydrology and water quality at the present leach field and surrounding private and public wells; issues with the proposed project's Eastern and Northern Irrigation Fields; issues with the traffic study.

4.8 HYDROLOGY AND WATER QUALITY

Page 4.8-20 Options 2, 3, and 4 - Industrial Wastewater discharged on the Project Site.

“Wastewater Treatment Option 2

Under Wastewater Treatment Option 2, industrial rinse water would be discharged into the Plant's on-site leach field located south of the plant building as currently permitted by the CVRWQCB under WDR Order 5-01-233. The potential impacts of discharging rinse water through the on-site leach field were previously addressed in the IS/MND for the On-site Leach Field and Facility Expansion Project for the Dannon Natural Spring Water Bottling Facility (Dannon IS/MND), which is incorporated into this EIR by reference (see Section 1.4).”

Comment:

The on-site leach field is being proposed for use in Options 2, 3, & 4 to dispose of Industrial Process Wastewater Flows & Industrial Rinse Wastewater Flows (TABLE 3-2, Page 3-15, Project Description.) My concern is that the installed leach field has been contaminated from the previous Dannon/Coke ten year operations, both under the leach field, downstream in the ground water, and in private and public wells and streams. The public needs to be assured that the installed leach field was not previously contaminated and is a viable option for Crystal Geyser to use in its operation.

Even though use of the installed leach field is approved by the CVRWQCB under WDR Order 5-01-233, the order is approximately 15 years old, and scheduled to be reviewed by the CVRWQCB. This would be a good time to have water quality tests completed and approved to make sure the leach field is a viable option.

Requested Mitigation Measures:

The DEIR should stipulate that mandatory water quality tests be performed on ground water under the present leach field, and in private and public wells and streams downstream from the Crystal Geyser plant, and approved by the Central Valley Regional Water Quality Control Board before applying Options 2, 3, or 4.

3.0 PROJECT DESCRIPTION

Wastewater Treatment Option 4 (Page 3-18)

“Wastewater Treatment Option 4 would occur during the time when sparkling water, flavored water, juice beverages, and tea is being produced at the Plant. Wastewater Treatment Option 4 would involve discharging domestic wastewater into the City’s sewer system while discharging industrial rinse wastewater and treated industrial process wastewater to the on-site leach field or to a proposed on-site irrigation system.”

Comment:

The proposed on-site irrigation system as show in Figure 3-11, Page 3-24, and described in Appendix J (Crystal Geyser On-site Irrigation System Technical Memorandum) shows two areas that will be used for the on-site irrigation system called the Eastern Field and Northern Field (Page 3-23).

Appendix J, Page 3, *“For Phase 1, only the Eastern Field will be irrigated in four sets for two hours per set per day, for a total of 22 days per month. This results in a total daily irrigation time of 8 hours each irrigation day. The Phase 1 system will use up to 80,000 gallons per day.”*

“In Phase 2, both the Eastern and Northern Fields will be irrigated with up to 108,000 gallons per day. The fields can use up to 120,000 gallons to meet the ETc of the trees. On the Eastern Field, irrigation will remain the same for Phase 2 as in Phase 1. For the Northern Field, two sets will be irrigated for two hours each, also for a total of 22 days per month.”

My concern is that after Dannon purchased the property from P&M Cedar Products, all hazardous materials were not removed completely on the eastern and northern property to the standards where irrigation type systems could be installed.

In Appendix R_01, Hazardous Materials Document, Page 37 in the 9.3 Onsite Environmental Issues section raise serious questions about the eastern property, and whether all the hazardous materials were discovered and properly disposed.

*“Note in County File from 1992 from P& M employee stated “old-timers” told **him that the Mill used to dump their old barrels of sodium azide, pentachlorophenol, and mercury sulfate at that Site.** The Site Foreman stated they had never used those chemicals at the Site and*

would check with former owners. There was no additional information concerning chemical use by former owners.”

“Unsigned letter from 2000 states that when the P&M Mill closed, a large quantity of refuse was piled for burning in the process of clearing the site. The material was burned as a “training exercise for local firefighters. As the refuse was being piled, residents in the area noted that in addition to wood and bark, it also contained what appeared to be chemical barrels, drums of lubricants, various petroleum products, tires, plastics, fiberglass, and HDPE-bearing materials. These materials were ultimately concealed within the finished pile and were not visible when it was ignited. The writer of the letter was concerned there may be hazardous materials remaining on Site. Letter stated it included photographs of burn pile which were not included in the file. It is unknown if this location was located or investigated.”

The DEIR assumes the **proposed property is safe for irrigation systems**, but provides no evidence that this is true. It assumes that previous mitigation made the property safe to use. However, my concern is that the previous mitigation did not remove all the hazardous materials. I do not know if higher mitigation standards need to be applied to property that will be irrigated, but it appears to me that we must be very careful for the safety of our ground water. Sadly, these hazardous materials may not be discovered until after the irrigation system is operational. In addition, the DEIR does not include a means of monitoring water quality at either the Eastern Field or the Northern Field property sites, as far as I can determine.

Requested Mitigation Measures:

Before Option 4 proposal can be considered as a viable option, both eastern and northern property areas need to be assessed and approved by the controlling agency as a safe option to use for discharging irrigation water. This is especially important considering the property had hazardous material contamination.

Option 4 needs to have water monitoring wells installed near the two fields to ensure that contaminants are not leaching into the ground water during operation, and monitored by the Central Valley Regional Water Quality Control Board. If water quality is determined to not meet standards, the irrigation would have to be stopped for that field.

4.11 TRANSPORTATION AND CIRCULATION

4.11.4 IMPACTS

Trip Generation, Page 4.11-10

Comment:

The traffic study of project truck trips was based on data from the Institute of Transportation Engineers (ITE) Trip Generation Manual.

“Trip generation results for the Proposed Project are based on the number of proposed employees and trip generation rates for light industrial uses (Land Use Code 110) taken from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition.” (Page 4.11-10).

How does the public know these numbers accurately reflect the truck trips Crystal Geysers will make initially and in the future? Crystal Geysers needs to provide better estimates of truck trips base on the products they plan to transport.

Requested Mitigation Measures:

The traffic study needs to specify Crystal Geysers’s best estimate of truck trips for initial operation and for full plant buildout, and additionally to specify seasonal differences.

Comment:

All transporting trucks have one way to enter and leave the Crystal Geysers plant and this is through Intersection 4 (TABLE 4.11-5, Page 4.11-14). Trucks entering the plant will travel southbound on Mt. Shasta Blvd and make a left turn into the Crystal Geysers entrance. On TABLE 4.11-4, Page 4.11-10, The AM Peak Hour shows 12 trucks making that left turn, and in the PM Peak Hour shows 11 trucks making a right turn to Mt. Shasta Blvd. In both cases, the truck counts represent approximately 25% of the 50 trucks entering or leaving throughout the day.

Requested Mitigation Measures:

The traffic study needs to specify the proposed truck counts arriving and departing by hour throughout the business day, and by day of week. The traffic study needs to explain why counts are higher for some hours of the day, such as the two busy hours mentioned. In addition, the traffic study needs to specify seasonal differences.

On TABLE 4.11-4, under Notes: 1 (Page 4.11-10) it states *“Truck trips were converted to passenger car equivalents by multiplying them by a factor of 1.5. Source: ITE, 2012.”*

Comment:

This Note 1 uses a factor of 1.5 to convert the number of trucks to equivalent numbers of

passenger cars to do the traffic study and determine the LOS (Level of Service). It is stated that this factor is based on the Institute of Transportation Engineers (ITE) manual. This figure is based upon the number of axles on the trucks that Crystal Geysler plans to use. More truck axles necessitates a higher factor. This raises the question of what truck type Crystal Geysler will be using (2-axle, 3-axle, 4-axle)?

Requested Mitigation Measures:

The traffic study needs to specify what truck axle size Crystal Geysler will use to transport their products. The reference manual referred to (Institute of Transportation Engineers) was not provided in the DEIR, so this needs to be made available or reference pages made available so that the public can verify that the correct factor is used based on the truck axle size Crystal Geysler plans to use.

Respectfully,

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