STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

900 North Skyline Drive, Suite B • Idaho Falls, Idaho 83402 • (208) 528-2650

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

Certified Mail

July 18, 2011

Sam Huffman, VP of Operations
Idahoan Foods, LLC
P.O. Box 130
Lewisville, ID 83431

RE: LA-000075-04, Idahoan Foods, LLC, Dubois Facility, Reuse Permit Issued.

Dear Mr. Huffman:

We are issuing the above referenced Wastewater Reuse Permit. The enclosed document is your official copy of the permit and demonstrates that you are authorized to operate the wastewater land application facility subject to certain specified requirements. **Your permit is issued as of July 19, 2011 and expires on July 18, 2016.**

A staff analysis and draft permit were issued to Idahoan Foods and also posted for public comment June 16, 2011. The comment period closed July 14, 2011. Idahoan Foods notified DEQ on July 18, 201 they did not have any comments or requested changes. No public comments were received. No changes have been made to the final permit.

A permit handoff meeting has been tentatively scheduled for Wednesday, July 27, 2011 at 3:00 p.m. at our office to review the terms and conditions of the permit. If you would like to reschedule the handoff meeting or if you have any further questions, please contact Tom Rackow at (208) 528-2650.

Sincerely,

Erick Neher
Regional Administrator

Enclosure

c: Leo Herbert, Idahoan Foods, LLC
Olga Cuzmanov, DEQ Wastewater Program.
Lindsay Stanton, DEQ Wastewater Program.
Greg Eager, DEQ Idaho Falls Regional Office.
Tom Rackow, DEQ Idaho Falls Regional Office.

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A. Permit Certificate

INDUSTRIAL
WASTEWATER REUSE PERMIT
LA-000075-04

Idahoan Foods, LLC, Dubois Facility, LOCATED AT **72 Potato Road, Dubois, Idaho 83423** IN **Clark County, T9N R36E Sections 9, 15, 16, 21, 22, 27, 28, 33, and 34** IS HEREBY AUTHORIZED TO CONSTRUCT, INSTALL, AND OPERATE A WASTEWATER REUSE SYSTEM IN ACCORDANCE WITH THE RECYCLED WATER RULES (IDAPA 58.01.17) AND WASTEWATER RULES (IDAPA 58.01.16), THE GROUND WATER QUALITY RULE (IDAPA 58.01.11), AND ACCOMPANYING PERMIT, APPENDICES, AND REFERENCE DOCUMENTS. THIS PERMIT IS EFFECTIVE FROM THE DATE OF SIGNATURE AND EXPIRES ON **July 17, 2011**.

Erick Neher
Idaho Falls Regional Administrator
Idaho Department of Environmental Quality

Date Issued: 7/18/11

****This facility has temporarily suspended operations at time of permit issuance. This permit includes multiple monitoring and reporting requirements in Sections G. and H., respectively to address the temporary cessation and return to full operation.**

DEPARTMENT OF ENVIRONMENTAL QUALITY
900 North Skyline, Suite B, Idaho Falls, Idaho 83402
(208) 528-2650

POSTING ON SITE RECOMMENDED

B. Permit Contents, Appendices, and Reference Documents

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Appendices

1. Environmental Monitoring Serial Numbers
2. Site Maps

References

1. See Section E. Compliance Schedule for Required Activities.

The Sections, Appendices, and Reference Documents listed on this page are all elements of Wastewater Reuse Permit LA-000075-04 and are enforceable as such. This permit does not relieve Idahoan Foods, LLC, hereafter referred to as the permittee, from responsibility for compliance with other applicable federal, state or local laws, rules, standards or ordinances.

C. Abbreviations, Definitions

BMP or BMPs	Best Management Practices
COD	Chemical Oxygen Demand
Crop Uptake	The mass of constituent consumed or 'taken up' by a crop, typically determined through a crop tissue analysis to determine nutrient content of the harvested portion of the plant.
DEQ or the Department	Idaho Department of Environmental Quality
Director	Director of the Idaho Department of Environmental Quality, or the Directors Designee, i.e. Regional Administrator
ET	Evapotranspiration – Loss of water from the soil and vegetation by evaporation and by plant uptake (transpiration)
GS	Growing Season – Typically April 01 through October 31 (214 days)
GW	Ground Water
GWQR	IDAPA 58.01.11 "Ground Water Quality Rule"
Guidance	Guidance for the Reclamation and Reuse of Municipal and Industrial Wastewater, DEQ
HLRgs	Growing Season Hydraulic Loading Rate. Includes any combination of wastewater and supplemental irrigation water applied to reuse hydraulic management units during the growing season. The HLRgs limit is specified in Section F. Permit Limits and Conditions.
HLRngs	Non-Growing Season Hydraulic Loading Rate. Includes any combination of wastewater and supplemental irrigation water applied to each hydraulic management unit during the non-growing season. The HLRngs limit is specified in Section F. Permit Limits and Conditions.
HMU	Hydraulic Management Unit (Serial Number designation is MU)
IWR	Irrigation Water Requirement – Any combination of wastewater and supplemental irrigation water applied at rates commensurate to the moisture requirements of the crop
IDAPA	Idaho Administrative Procedures Act.
LG	Lagoon
lb/ac-day	Pounds (of constituent) per acre per day
MG	Million Gallons (1 MG = 36.827 acre-inches)
MGA	Million Gallons Annually (per WLAP Reporting Year)
NGS	Non-Growing Season – Typically November 01 through March 31 (151 days)
NVDS	Non-Volatile Dissolved Solids (= Total Dissolved Solids less Volatile Dissolved Solids)
O&M Manual	Operation and Maintenance Manual, also referred to as the Plan of Operation
Reuse	The use of reclaimed wastewater for beneficial uses including, but not limited to, land treatment, irrigation, aquifer recharge, use in surface water features, toilet flushing in commercial buildings, dust control, and other uses.
Reuse Reporting Year	The reporting year begins with the non-growing season and extends through the growing season of the following year, typically November 01 – October 31. For example, the 2000 Reporting Year was November 01, 1999 through October 31, 2000.
SAR	Sodium Absorption Ratio
SI	Supplemental Irrigation water applied to the reuse treatment site.
SMU	Soil Monitoring Unit (Serial Number designation is SU)
TDS	Total Dissolved Solids or Total Filterable Residue
USGS	United States Geological Survey
WW	Wastewater applied to the reuse treatment site

D. Facility Information

Legal Name of Permittee	Idahoan Foods, LLC
Type of Wastewater	Industrial – Food Processing.
Method of Treatment	Slow rate land application using center pivot irrigation.
Type of Facility	Potato Processing (dehydration)
Facility Location	72 Potato Road Dubois, Idaho 83423 Elevation: 4815 feet
Legal Location	Approximately 6 miles south of Dubois, Idaho. T9N, R36E, Section 9, 15, 16, 21, 22, 27, 28, 33, and 34
County	Clark
USGS Quads	Camas
Soils on Site	NRCS Soil Survey data is incomplete for this location. Soil Test Pits describe 3 distinct soils: Soils A, B = Sandy and Silty Loams, 30 – 70% gravel below 2 feet. Soil C = Loam to 5 feet.
Depth to Ground Water	Approximately 60 feet to perched aquifer Approximately 130 feet to regional aquifer
Beneficial Uses of Ground Water	Agricultural, Industrial, Domestic
Nearest Surface Water	HUC #17040214, Beaver-Camas Camas Creek: up-gradient, north of site. Beaver Creek: side-gradient, southeast of site.
Beneficial Uses of Surface Water	Aquatic Life, Recreation (IDAPA 58.01.02.150.16)
Responsible Official **Mailing Address** **Phone / Fax**	Mr. Sam Huffman, Vice President of Operations Idahoan Foods, LLC P.O. Box 130 Lewisville, ID 83431 Tel: (208) 754-4686 Fax: (208) 754-0094
Facility Contact **Mailing Address** **Phone / Fax**	Mr. Leo Herbert, Corporate Environmental Manager Idahoan Foods, LLC P.O. Box 130 Lewisville, ID 83431 Tel: (208) 754-8194 Fax: (208) 754-8193

E. Compliance Schedule for Required Activities

The Activities in the following table shall be completed on or before the Completion Date unless modified by the Department in writing.

Compliance Activity Number Completion Date	Compliance Activity Description
CA-075-01 **Monitoring Well GW-007504 Access Agreement** **Within Thirty (30) days of permit issuance**	Monitoring Well GW-007504 is located within a previously permitted wastewater treatment field known as Corner E (MU-007510 in previous permit LA-00007503) and crop damage may result when accessing and sampling this well during the Growing Season. The permittee must present to DEQ evidence of a legal contract or agreement with the land owner that allows continued personnel and equipment access (including vehicles, generators, etc. as necessary) to GW-007504 year-round for sampling purposes. If permittee cannot provide evidence of the contract or agreement, then GW-007504 shall be properly abandoned in accordance with Idaho Department of Water Resources requirements and present plans and specifications for a new monitoring well constructed on property owned or controlled by Idahoan Foods as a replacement. Plans, specifications, record drawings, and survey results for any new well shall be required as described in CA-075-04 and CA-075-05.
CA-075-02 **Disconnect Wastewater Mainline** **Within Thirty (30) days of permit issuance**	The permittee shall physically disconnect the wastewater mainline on the outside of the building, directly downstream from the Amiad filters, as it exits the facility to prevent any wastewater or other discharges through the pipeline. The exterior disconnection shall remain visible from the parking lot of the facility. This pipeline shall remain physically disconnected from the facility and wastewater shall not be allowed to exit the facility until the Pre-Startup Inspection is performed as required by CA-075-13, below.
CA-075-03 **Wastewater Disposal Ponds Removal** **October 31, 2011**	The unpermitted wastewater disposal ponds in the northwest corner of MU-07501 (Pivot #315) shall be permanently removed by disconnecting all piping connections between the disposal ponds and the wastewater distribution system, demolition of the lagoon berms, and 'leveling' of the site. Other methods to render to ponds unusable and unable to store water may be considered, but will need to be preapproved by the Department prior to implementation. The permittee shall contact DEQ and schedule an inspection to review and approve all piping disconnects prior to burial.
CA-075-04 **Refurbish Wells** **March 31, 2012**	The permittee shall refurbish or replace up-gradient monitoring well GW-007508 (MW-154NE) and down-gradient monitoring well GW-007510 (MW-153) to ensure ground water will be available for collection and sampling from these wells year-round. Plans and specifications shall be submitted to and approved by DEQ prior to construction.

E. Compliance Schedule for Required Activities

Compliance Activity Number Completion Date	Compliance Activity Description
CA-075-05 **Well Elevation Survey** **April 30, 2012**	All ground water monitoring wells listed in Appendix 1 shall be surveyed by a Professional Land Surveyor licensed in Idaho and the results provided to DEQ. Horizontal locations shall be specified using the Public Land Survey system with accuracy to the nearest third quarter (i.e. Township, Range, Section, ¼, ¼, ¼). Vertical locations to top of casing shall be determined relative to a universally recognized vertical datum and specified to an accuracy of plus/minus one-hundredth of a foot (± 0.01 ft). The survey should be performed within 30-days after completion of CA-075-04.
CA-075-06 **DEQ Pre-Notification of Return to Operations** **Ninety (90) days prior to startup and return to operation of the facility**	The permittee shall provide written notification to DEQ at least ninety (90) days prior to the anticipated startup of the facility and return to operation. The notification shall specify the estimated start-date of the facility and summarize the status and anticipated submittal and/or completion dates of all remaining compliance activities.
CA-075-07 **Disconnect Pipelines to Unpermitted Fields** **Sixty (60) days prior to startup and return to operation of the facility**	1) All wastewater pipelines supplying wastewater to Pivot #316 (MU-007502), Pivot #317 (MU-007503), Corners A, B, and E (MU-007510), Corners C, D, and L (MU-007511) and Pivot #110 (not currently permitted) shall be physically removed and/or permanently disconnected from the wastewater distribution system supplying the remaining permitted acreage. The permittee shall contact DEQ and schedule an inspection to review and approve all piping disconnects or capping prior to burial. 2) The supplemental irrigation diversions listed in Appendix 1 of this permit shall only provide irrigation water to the HMU's listed in Appendix 1 of this permit. Any pipeline providing supplemental irrigation from the permitted diversions listed in Appendix 1 to unpermitted fields or areas not identified in this permit shall be physically removed and/or permanently disconnected from the permitted irrigation distribution. 3) All supplemental irrigation diversions not listed in Appendix 1 of this permit shall be physically removed and/or permanently disconnected from the distribution system used to provide irrigation to the permitted

E. Compliance Schedule for Required Activities

Compliance Activity Number Completion Date	Compliance Activity Description
CA-075-08 **New Monitoring Well** **Sixty (60) days prior to startup and return to operation of the facility**	The permittee shall install a new monitoring well (GW-007513) that will be positioned to measure the representative water quality up-gradient of Pivot #313 (MU-007513) and Pivot #314 (MU-007514). Upon completion of the well, as-built record drawings and a completed elevation survey accurate to +/- 0.05 feet, following the requirements of CA-075-05, shall be provided to DEQ to document construction and specify the top of casing elevation that will be used to perform aquifer depth and elevation measurements required by this permit. Plans and specifications shall be submitted to and approved by DEQ prior to construction.
CA-075-09 **Install Flow Meters on Pivots** **Sixty (60) days prior to startup and return to operation of the facility**	Flow meters shall be installed on each center pivot for each Hydraulic Management Unit listed in Appendix 1 of this permit to record all wastewater and supplemental irrigation flows applied through each pivot to each HMU. The flow meter specifications and description of the installation locations for each meter shall be reviewed and approved by DEQ prior to construction or installation. The meters shall include non-volatile memory that prevents tampering, deleting, or any other modification of the recorded total volume.
CA-075-10 **Install Flow Meters on Supplemental Irrigation Diversions** **Sixty (60) days prior to startup and return to operation of the facility**	Flow meters shall be installed on each Supplemental Irrigation diversion listed in Appendix 1 of this permit to record all supplemental irrigation flows provided to the wastewater treatment fields listed in Appendix 1 of this permit. The flow meter specifications and description of the installation locations for each meter shall be reviewed and approved by DEQ prior to construction or installation. The meters shall include non-volatile memory that prevents tampering, deleting, or any other modification of the recorded total volume.
CA-075-11 **Backflow Assemblies** **Sixty (60) days prior to startup and return to operation of the facility**	Appropriate backflow prevention assemblies shall be installed at all supplemental irrigation diversions identified in Appendix 1. The permittee shall submit information regarding the proposed type of assembly and its specifications to DEQ for review and approval prior to installation. Testing of the installed assemblies shall be performed by a certified backflow tester and the test results submitted to DEQ by the completion date specified herein.

E. Compliance Schedule for Required Activities

Compliance Activity Number Completion Date	Compliance Activity Description
CA-075-12 **Water Quality Improvement Plan** **Sixty (60) days prior to startup and return to operation of the facility**	Down gradient monitoring wells GW-007502, GW-007503, GW-007506, and GW-007507 show impacts that exceed either the Primary or Secondary Constituent Standards Listed in IDAPA 58.01.11.200 for the constituents identified below. The permittee shall submit a Water Quality Improvement Plan to DEQ for review and approval as follows: 1) The Water Quality Improvement Plan shall specify the actions and procedures the permittee will implement to bring ground water quality into compliance with GWQR requirements for nitrate nitrogen at monitoring wells GW-007502 (MW-2), GW-007503 (MW-3), and GW-007507 (MW-152); and 2) The Water Quality Improvement Plan shall specify the actions and procedures the permittee will implement to bring ground water quality into compliance with the Ground Water Quality rule for Total Dissolved Solids, Iron, and Manganese at monitoring well GW-007506 (MW-151 perched). The Plan shall include schedule(s) identifying when the permittee expects ground water quality to achieve compliance with the Ground Water Quality Rule for the constituents identified in 1) and 2), above. Upon approval of this Plan, the permittee shall continue to operate the facility in accordance with the approved Plan for the duration of the permit. Any changes or modifications to operations identified in the approved Plan shall be reviewed and approved by DEQ prior to implementation.
CA-075-13 **Plan of Operation** **Sixty (60) days prior to startup and return to operation of the facility**	An updated Plan of Operation for the wastewater reuse facilities, incorporating the requirements of this permit, shall be submitted to DEQ for review and approval. The O&M manual shall be designed for use as an operator guide for actual day-to-day operations to meet permit requirements and shall include daily sampling and monitoring requirements to insure proper operation of the wastewater treatment facility. At a minimum, the Plan of Operation shall specifically address the following items: • The operation and maintenance of all wastewater components from the production plant to the reuse fields including: pumps, clarifiers, centrifuges, mud pits, transmission lines, pump stations, sumps, pivots, big-guns, drainage guns, control systems, valves, flow meters, backflow devices and testing, meter calibrations, valve exercising, etc. • Quality Assurance / Quality Control as described within a Quality Assurance Project Plan (QAPP), including all sampling, monitoring and reporting requirements of this permit and a description of the following: laboratory analytical methods, detection limits and other activities; data verification and validation; data storage, retrieval and assessment; and monitoring program evaluation and improvement.

E. Compliance Schedule for Required Activities

Compliance Activity Number Completion Date	Compliance Activity Description
	• Buffer Zones and Wellhead Protection including the requirements set forth in Section F. of this permit. • Runoff Management including control structures and/or other BMP's (e.g. collection basins, berms, etc.) designed to prevent runoff from any site or fields used for wastewater reuse by the permittee except in the event of a 25-year, 24-hour storm event or greater, using Western Regional Climatic Center (WRCC) Precipitation Frequency Map, Figure 28 'Isopluvials of 25-YR, 24-HR Precipitation.' For this site, the 25-year, 24-hour event is 2.2 inches • Waste Solids Management including mud pit dredging, filter backwash and collection, transportation, and disposal of tare dirt, rocks, vines, cull potatoes, etc. • Crop rotations, harvesting, irrigation rates and fertilizer requirements. The Plan of Operation shall include copies of all blank forms used to document, track, and record information required for permit compliance (daily flow logs, chain of custody forms, harvest receipts, fertilizer application logs, etc.) with guidance explaining how and when to complete them. The Plan shall also identify personnel responsible for operation and management of the permitted HMU's, and compliance with permit requirements, and shall explain the responsibilities and separation of duties between the permittee and land owner as they relate to operating the wastewater treatment fields to maintain permit compliance. If the most recent plans for any of the above are still current, they may be incorporated into the updated Plan of Operation submitted for DEQ review.
CA-075-14 **Pre-Startup Inspection** **Thirty (30) days prior to startup and return to operation of the facility**	The permittee shall notify DEQ and schedule a pre-startup inspection at least 30 days prior to startup of the facility.

F. Permit Limits and Conditions

<table>
<tr><th>Category</th><th>Permit Limits and Conditions</th></tr>
<tr><td>Type of Wastewater</td><td>Industrial – Potato Processing (dehydration)</td></tr>
<tr><td>Application Site Area</td><td>1,462 acres consisting of 7 full-circle center pivots and 3 half-circle center pivots as specified in Appendix 1 of this permit. Wastewater application to any other locations or by any other means not listed in Appendix 1 of this permit is not allowed.</td></tr>
<tr><td>Application Season</td><td>Year-Round</td></tr>
<tr><td>Growing Season (GS)</td><td>April 1st through October 31st (214 days)</td></tr>
<tr><td>Non-growing Season (NGS)</td><td>November 1st through March 31st (151 days)</td></tr>
<tr><td>Reporting Year</td><td>November 1st through October 31st</td></tr>
<tr><td>Growing Season Maximum Hydraulic Loading Rate (Applies to wastewater and supplemental irrigation water). Loading rate shall be determined based on actual acreage utilized, if less than acreage shown in Appendix 1.</td><td>The Growing Season Hydraulic Loading Rate shall be substantially equal to the Irrigation Water Requirement (IWR) based upon the most current crop-specific Precipitation Deficit (Pdef) data from the 'Hamer 4 NW' (NWS NOAA station 103964) weather station available at http://www.kimberly.uidaho.edu/ETIdaho/stninfo.php?station=103964

The IWR shall be calculated by dividing the crop-specific Pdef, determined above, by the specific irrigation efficiency (Ei) of each HMU as follows:
IWR = Pdef / Ei

The Irrigation Efficiency to be used is 80% for all center pivots. Only the center pivots shall be used to hydraulically load all HMU's identified in Appendix 1. Irrigation of other areas within the boundary of each permitted HMU using other irrigation devices not allowed.</td></tr>
<tr><td>Non-Growing Season Maximum Hydraulic Loading Rate (applies to wastewater and supplemental irrigation water). Loading rate shall be determined based on actual acreage utilized, if less than acreage shown in Appendix 1.</td><td>The maximum NGS hydraulic loading rate to each HMU is:
<table>
<tr><th>HMU</th><th>Pivot</th><th>(Depth, in/ac)</th><th>(Volume, MG)</th></tr>
<tr><td>MU-007501</td><td>#315</td><td>4.0</td><td>24.00</td></tr>
<tr><td>MU-007505</td><td>#303</td><td>4.0</td><td>30.63</td></tr>
<tr><td>MU-007506</td><td>#302</td><td>4.0</td><td>24.55</td></tr>
<tr><td>MU-007507</td><td>#301</td><td>4.0</td><td>23.79</td></tr>
<tr><td>MU-007508</td><td>#300</td><td>4.0</td><td>21.07</td></tr>
<tr><td>MU-007513</td><td>#313</td><td>4.0</td><td>13.03</td></tr>
<tr><td>MU-007514</td><td>#314</td><td>4.0</td><td>15.86</td></tr>
<tr><td>MU-007521</td><td>Corner F</td><td>4.0</td><td>2.12</td></tr>
<tr><td>MU-007522</td><td>Corner G</td><td>4.0</td><td>1.90</td></tr>
<tr><td>MU-007523</td><td>Corner H</td><td>4.0</td><td>1.85</td></tr>
<tr><td colspan="3">Total:</td><td>158.80 MG</td></tr>
</table>
Only the center pivots shall be used to hydraulically load all HMU's identified in Appendix 1. Irrigation of other areas within the boundary of each permitted HMU using other irrigation devices not allowed.</td></tr>
</table>

F. Permit Limits and Conditions

Category	Permit Limits and Conditions
Maximum Nitrogen Loading Rate, each HMU. Loading rate shall be determined based on actual acreage utilized, if less than acreage shown in Appendix 1.	**During Temporary Cessation**: Supplemental Nitrogen Fertilizer shall be applied in substantial accordance with agricultural fertilizer Best Management Practices that maximize ground water protection and reduce ground water nitrate concentrations in impacted areas. **Upon Startup**: Nitrogen loading (wastewater + supplemental fertilizer + Waste Solids) shall not exceed 150% of Crop Uptake.
Maximum Wastewater COD Loading, each HMU (seasonal averages). Loading rate shall be determined based on actual acreage utilized, if less than acreage shown in Appendix 1.	Growing Season: 50 lb/ac-day seasonal average, all HMU's. Non-Growing Season: 50 lb/ac-day seasonal average, all HMU's
Runoff Control	Runoff shall be managed in accordance with the most recent Runoff Control procedures approved by DEQ.
Odor Management	Nuisance conditions including odors shall be managed by the permittee in accordance with Section I.3 of this permit. A more specific Nuisance Odor Management Plan is not required in the Plan of Operation at this time due to the remoteness of the facility and lack of historical odor complaints.
Waste Solids Management	All waste solids including, but not limited to, the dredging, transportation and disposal of silt, tare, culls, rocks, vines, mud, sludges, etc. shall be managed to meet the requirements of Section I, Item #5 of this permit. Waste Solids shall be managed in accordance with the most recent Waste Solids Management procedures approved by DEQ.

F. Permit Limits and Conditions

Category	Permit Limits and Conditions
Livestock Grazing	Not allowed.
Buffer Zones and Wellhead Protection	All buffer zones must comply with, at a minimum, local zoning ordinances. Other minimum buffer zones are as follows: • 1,000 feet between reuse sites and public water supply wells • 500 feet between reuse sites and private water supply wells • 300 feet between reuse sites and inhabited dwellings • 100 feet between reuse sites and permanent and intermittent surface water • 50 feet between reuse sites and irrigation ditches and canals • 50 feet between reuse sites and areas accessible by the public • Berms and other BMP's shall be used to protect the well head of on-site wells Any mitigation measures or proposals to reduce buffer zone distances shall be submitted to and approved by DEQ prior to use. Buffer Zones shall be maintained and managed in accordance with the most recent Buffer Zone and Wellhead Protection requirements and procedures approved by DEQ.
Quality Assurance / Quality Control (QA/QC)	Quality Assurance and Quality Control for monitoring and operations required in this permit shall be managed in accordance with the most recent QA/QC or QAPP procedures approved by DEQ.
Ground Water Quality	Ground water quality shall be in compliance with the Ground Water Quality Rule (GWQR), IDAPA 58.01.11.
Construction Plans	Prior to construction or modification of all wastewater facilities associated with the reuse system or expansion, detailed plans and specifications shall be reviewed and approved by DEQ. Within 30 days of completion of construction, the permittee shall submit as-built plans to DEQ or submit a certification letter stating that all construction was done in substantial compliance with DEQ approved plans and specifications.

F. Permit Limits and Conditions

Category	Permit Limits and Conditions
Backflow Prevention	Prior to startup of facility, backflow prevention assemblies will be required at all supplemental irrigation diversions interconnected to the wastewater distribution system. Upon startup, all backflow prevention assemblies are required to be installed, operational, and tested at least annually by a certified backflow assembly tester to ensure continued successful operation of the device. The annual testing results and any corrective actions performed to keep the assembly operational shall be documented and reported within the Annual Report. See Section E, CA-075-10 and Section G, Table 2 for more information.
Fencing and Posting	Not required.

G. Monitoring Requirements

1) Appropriate analytical methods, as given in the *Idaho Guidance for Reclamation and Reuse of Municipal and Industrial Wastewater*, or as approved by the Idaho Department of Environmental Quality (hereinafter referred to as DEQ), shall be employed. A description of approved sample collection methods, appropriate analytical methods and companion QA/QC protocol shall be included in the Quality Assurance Project Plan (QAPP) within the Plan of Operation.

2) The permittee shall monitor and measure parameters as stated in the Facility Monitoring Tables in this section.

3) Samples shall be collected at times and locations that represent typical environmental and process parameters being monitored.

4) Unless otherwise agreed to in writing by the DEQ, data collected and submitted shall include, but not be limited to, the parameters and frequencies in the Facility Monitoring Tables on the following pages. Monitoring is required at the frequency shown in the tables below.

5) Ten (10) soil sample locations shall be selected for each management unit with greater than fifteen acres and Five (5) soil sample locations shall be selected for each management unit with fifteen acres or less. Three (3) soil samples shall be collected at each sample location, one at 0-12 inches, one at 12-24 inches, and one at 24-36 inches. The soil samples collected at each depth shall be composited to yield three (3) samples for analysis from each management unit.

6) Ground Water Monitoring Procedure: Ground Water Monitoring Wells shall be purged a minimum of three casing volumes and/or until field measurements for pH, specific conductance and temperature meet the following conditions: two successive temperature values measured at least five minutes apart are within one degree Celsius of each other, pH values for two successive measurements measured at least five minutes apart are within 0.2 units of each other, and two successive specific conductance values measured at least five minutes apart are within 10% of each other. This procedure will determine when the wells are suitable for sampling for constituents required by the permit. Other procedures, such as low flow sampling, may be considered by DEQ for approval. The static water level shall be measured prior to pumping or sampling.

7) Annual reporting of monitoring requirements is described in Section H, Standard Reporting Requirements.

8) Monitoring locations are defined in Appendix 1, "Environmental Monitoring Serial Numbers".

G. Monitoring Requirements

Facility Monitoring Tables

Table 1. Monitoring Required During Temporary Cessation. The following monitoring shall be performed by the permittee during the cessation period currently in effect at permit issuance:

Monitoring Parameter	Required Action
Ground Water Monitoring	The permittee shall perform one (1) round of ground water monitoring each October at all ground water monitoring wells listed in Appendix 1 following the monitoring description, parameters, and units specified in Section G, Table 2, below.
Ground Water Contour Mapping	Ground Water Contour Maps shall be created for each ground water monitoring event. The contour maps for each monitoring event shall be presented in the Annual Report.
Crop Fertilization	The permittee shall document all fertilizer Nitrogen and Phosphorus application rates applied to each HMU listed in Appendix 1. The Fertilizer Type, Fertilizer Guarantee, and Application Rate (lb/ac) for each application. Present individual applications and seasonal totals for each HMU in the Annual Report.
Crop Yield	The permittee shall document the crop types, number of harvests or cuttings per Growing Season, and Growing Season total dry yields (in total pounds, and pounds/acre) for each HMU listed in Appendix 1.
Irrigation Rates	The permittee shall document the monthly and season total supplemental irrigation application rates (inches/acre) to each HMU listed in Appendix 1.

G. Monitoring Requirements

Table 2. Monitoring Required Upon Return to Operation. Upon re-start of the facility and generation of wastewater, Table 1 requirements will no longer apply and the monitoring requirements specified in this Table 2 shall be required and remain in effect until any future closure plan is submitted to and approved by DEQ in accordance with IDAPA 58.01.17.801.

Frequency	Monitoring Point	Description/Type of Monitoring	Parameters (Units)
Daily	Flow meter at wastewater entry to reuse system, listed in Appendix 1.	Total Wastewater Volume to reuse system	Volume (MG) *Present daily, monthly, and seasonal totals in Annual Report.
Daily	Flow meter at each supplemental irrigation diversion, listed in Appendix 1.	Total Supplemental Irrigation Volume to reuse system, each well or diversion.	Volume (MG) * Present daily, monthly, and seasonal totals in Annual Report.
Daily	Flow meter at each HMU listed in Appendix 1.	Wastewater applied to each HMU	Volume (MG), Application Depth (inches) * Present daily, monthly, and seasonal totals for each HMU in Annual Report.
Daily	Flow meter at each HMU listed in Appendix 1.	Supplemental Irrigation applied to each HMU	Volume (MG), Application Depth (inches) * Present daily, monthly, and seasonal totals for each HMU in Annual Report.
Prior to Growing Season	Each HMU listed in Appendix 1.	Determine Irrigation Water Requirement (IWR) for each crop, each HMU	IWR Volume (MG), Application Depth (inches) *Present monthly IWR totals for each HMU in Annual Report.
Monthly	Wastewater sampling port listed in Appendix 1.	Wastewater quality into reuse system – 24-hr. Composite sample.	pH (s.u.), Electrical Conductivity (umhos/cm), Chemical Oxygen Demand (mg/L), Total Kjeldahl Nitrogen (mg/L), Ammonia-Nitrogen (mg/L), Nitrate-Nitrogen (mg/L), Total Phosphorous (mg/L),

G. Monitoring Requirements

Frequency	Monitoring Point	Description/Type of Monitoring	Parameters (Units)
			Total Dissolved Solids (mg/L), Volatile Dissolved Solids (mg/L), Non-Volatile Dissolved Solids (mg/L)
Once per year (July)	All Supplemental Irrigation diversions listed in Appendix 1.	Grab sample	Total Nitrogen (mg/L), Total Phosphorous (mg/L), Total Dissolved Solids (mg/L), Volatile Dissolved Solids (mg/L), Non-Volatile Dissolved Solids (mg/L)
Twice per year (April and Oct)	Each Soil Monitoring Unit listed in Appendix 1	See note 5	pH (s.u.), Electrical Conductivity (umhos/cm), Nitrate-Nitrogen (mg/kg), Ammonium-Nitrogen (mg/kg), Available Phosphorus (mg/kg), Potassium (mg/kg), Organic matter (%), DTPA Fe (mg/kg) DTPA Mn (mg/kg), Sodium Adsorption Ratio (unitless).
Three (3) Times Per Year (Apr, Jul, Oct)	Ground Water monitoring wells, listed in appendix 1	See Note 6	Water Table Depth (ft), Water Table Elevation (ft), Specific Conductivity (umhos/com), Temperature (F or C), pH (s.u.), Nitrate-Nitrogen (mg/L), Total Phosphorous (mg/L), Total Dissolved Solids (mg/L), Chloride (mg/L), Sulfate-Sulfur (mg/L), Total Iron (mg/L), Total Manganese (mg/L), Dissolved Iron[1] (mg/L), Dissolved Manganese[1] (mg/L).

G. Monitoring Requirements

Frequency	Monitoring Point	Description/Type of Monitoring	Parameters (Units)
Each Harvest or Cutting	Each HMU listed in Appendix 1	Crop type and yield, each crop, each harvest, on each HMU	Crop Type Harvest Date Acreage Harvested (acres) Crop Yield, wet (total lbs, lb/acre) Moisture Content (%) Crop Yield, dry (total lbs, and lb/acre) *Maintain and submit records of each cutting and harvest with each annual report including truck weight receipts, bale counts, moisture readings, etc.
Each Harvest or Cutting	Each HMU listed in Appendix 1	Plant tissue analysis: Composite sample of harvested portion for each crop, each harvest, on each HMU	Nitrate-Nitrogen (ppm, dry basis), Total Kjeldahl Nitrogen (%, dry basis), Total Phosphorus (%, dry basis), Ash (%, dry basis)
Each Harvest or Cutting	Each HMU	Calculate crop nutrient content for each crop, each harvest, on each HMU	Nitrogen content (total lbs, lb/acre), Phosphorus content (total lbs, lb/acre), Ash content (total lbs, lb/acre), **Calculate using Dry Basis**
Each Fertilizer Application	Each HMU	Report Fertilizer Nitrogen and Phosphorus application rates	Fertilizer Type, Fertilizer Guarantee, and Application Rate (lb/ac) for each application.
Annually	Each HMU	Calculate wastewater COD loading rates	Monthly COD-Load (lb/ac) Seasonal COD-Load (lb/ac) NGS Average COD-Load (lb/ac-day) GS Average COD-Load (lb/ac-day)
Annually	Each HMU	Calculate wastewater nitrogen loading rates	Monthly N-Load (lb/ac) Seasonal N-Load (lb/ac) Annual N-Load (lb/ac)
Annually	Each HMU	Calculate wastewater phosphorous loading rates	Monthly P-Load (lb/ac) Seasonal P-Load (lb/ac) Annual P-Load (lb/ac)
Annually	Each HMU	Calculate wastewater NVDS loading rate	Monthly NVDS-Load (lb/ac) Seasonal NVDS-Load (lb/ac) Annual NVDS-Load (lb/ac)

G. Monitoring Requirements

Frequency	Monitoring Point	Description/Type of Monitoring	Parameters (Units)
Annually	Ground Water monitoring wells, listed in appendix 1	Ground Water Contour Mapping	Submit Ground Water Contour Maps within the Annual Report for each ground water monitoring event during the Reporting Year (3 monitoring events = 3 contour maps per year).
Annually	All Backflow Assembly Devices Connected to the Wastewater Reuse System	Backflow testing	Document and submit to DEQ (in the Annual Report) the annual testing results of all Backflow Assembly Devices required to be connected to the wastewater distribution system(s). If any test failed, report the date of repair or replacement of backflow prevention device, and if the repaired/replaced device was re-tested and confirmed to be operating correctly. Backflow assembly or device testing shall be performed by a certified backflow tester.
First Year of Permit, and after replacement or modification of Meter and/or associated piping	All flow measurement locations.	Flow measurement calibration of all flows to reuse.	Document the flow measurement calibration of all flow meters and pumps used to directly or indirectly measure all wastewater, tail water, flushing water, and supplemental irrigation water flows applied to each HMU. Submit the calibration testing and accuracy results to DEQ within the Annual Report.

1. Analytical results are required for dissolved iron and/or manganese only if the results for total iron and/or manganese exceed the standards in IDAPA 58.01.11.200.01.b.

H. Standard Reporting Requirements

1.) The Permittee shall submit an Annual Wastewater-Reuse Site Performance Report ("Annual Report") prepared by a competent environmental professional no later than **January 31** of each year, which shall cover the previous reporting year. The Annual Report shall include an interpretive discussion of monitoring data (ground water, soils, hydraulic loading, wastewater etc.) with particular respect to environmental impacts by the facility.

2.) The annual report shall contain the results of the required monitoring from the applicable Table as described in *Section G. Monitoring Requirements*. During the temporary cessation currently in effect at permit issuance the monitoring requirements specified in Section G, Table 1 now apply. Upon re-start of the facility the monitoring requirements specified in Section G, Table 2 will apply. If the permittee monitors any parameter more frequently than required by this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the annual report. During the temporary cessation currently in effect at permit issuance, only the monitoring requirements listed in Section G, Table 1 are required to be included in the Annual Report.

3.) One hardcopy and one electronic pdf copy of the annual report shall be submitted to the Engineering Manager in the Idaho Falls Regional DEQ Office.

Greg Eager, P.E.
DEQ Idaho Falls Regional Office
900 N. Skyline, Suite B
Idaho Falls, ID 83402
208-528-2650

4.) Notice of completion of any work described in *Section E. Compliance Schedule for Required Activities* shall be submitted to the Department within 30 days of activity completion. The status of all other work described in Section E shall be submitted with the Annual Report.

5.) All laboratory reports containing the sample results for monitoring required by *Section G. Monitoring Requirements* of this permit shall be submitted with the Annual Report.

I. Standard Permit Conditions: Procedures and Reporting

1. The permittee shall at all times properly maintain and operate all structures, systems, and equipment for treatment, operational controls and monitoring, which are installed or used by the permittee to comply with all conditions of the permit or the Wastewater Reuse Permit Regulations, in conformance with a DEQ approved, current Plan of Operations (Operations and Maintenance Manual) which describes in detail the operation, maintenance, and management of the wastewater treatment system. This Plan of Operations shall be updated as necessary to reflect current operations.

2. Wastewater(s) or recharge waters applied to the land surface must be restricted to the premises of the application site. Wastewater discharges to surface water that require a permit under the Clean Water Act must be authorized by the U.S. Environmental Protection Agency.

3. Wastewater must not create a public health hazard or nuisance condition as stated in IDAPA 58.01.16.600.03. In order to prevent public health hazards and nuisance conditions the permittee shall:

   a. Apply wastewater as evenly as practicable to the treatment area;
   b. Prevent organic solids (contained in the wastewater) from accumulating on the ground surface to the point where the solids putrefy or support vectors or insects; and
   c. Prevent wastewater from ponding in the fields to the point where the ponded wastewater putrefies or supports vectors or insects.

4. The permittee shall:

   a. Manage the wastewater reuse treatment site as an agronomic operation where vegetative cover is grown and harvested to utilize the nutrients and minerals in the wastewater, and,
   b. Not hydraulically overload any particular areas of the wastewater reuse treatment site.

5. All waste solids, including dredgings and sludges, shall be utilized or disposed in a manner which will prevent their entry, or the entry of contaminated drainage or leachate therefrom, into the waters of the state such that health hazards and nuisance conditions are not created; and to prevent impacts on designated beneficial uses of the ground water and surface water. The permittee's management of waste solids shall be governed by the terms of the DEQ approved Waste Solids Management Plan, which upon approval shall be an enforceable portion of this permit.

6. If the permittee intends to continue operation of the permitted facility after the expiration of an existing permit, the permittee shall apply for a new permit at least six months prior to the expiration date of the existing permit in accordance with the Wastewater Reuse Permit Regulations and include seepage tests on all lagoons per latest DEQ procedures.

7. The permittee shall allow the Director of the Idaho Department of Environmental Quality or the Director's designee (hereinafter referred to as Director), consistent with Title 39, Chapter 1, Idaho Code, to:

   a. Enter the permitted facility,
   b. Inspect any records that must be kept under the conditions of the permit.
   c. Inspect any facility, equipment, practice, or operation permitted or required by the permit.
   d. Sample or monitor for the purpose of assuring permit compliance, any substance or any parameter at the facility.

8. The permittee shall report to the Director under the circumstances and in the manner specified in this section:

   a. In writing thirty (30) days before any planned physical alteration or addition to the permitted facility or activity if that alteration or addition would result in any significant change in information that was submitted during the permit application process.
   b. In writing thirty (30) days before any anticipated change which would result in non-compliance with any permit condition or these regulations.
   c. Orally within twenty-four (24) hours from the time the permittee became aware of any non-compliance which may endanger the public health or the environment at telephone numbers provided in the permit by the Director (see below)

DEQ Regional Office: see Permit Certificate Page
Emergency 24 Hour Number: 1-800-632-8000

d. In writing as soon as possible but within five (5) days of the date the permittee knows or should know of any non-compliance unless extended by the DEQ. This report shall contain:

   i. A description of the non-compliance and its cause;
   ii. The period of non-compliance including to the extent possible, times and dates and, if the non-compliance has not been corrected, the anticipated time it is expected to continue; and
   iii. Steps taken or planned to reduce or eliminate reoccurrence of the non-compliance.

e. In writing as soon as possible after the permittee becomes aware of relevant facts not submitted or incorrect information submitted, in a permit application or any report to the Director. Those facts or the correct information shall be included as a part of this report.

9. The permittee shall take all necessary actions to prevent or eliminate any adverse impact on the public health or the environment resulting from permit noncompliance.

10. The permittee shall determine (on an on-going basis) if any noxious weed problems relate to the permitted sites. If problems are present, coordinate with the Idaho Department of Agriculture or the local County authority regarding their requirements for noxious weed control. Also address these control operations in an update to the Operations and Maintenance Manual.

J. Standard Permit Conditions: Modifications, Violation, and Revocation

1. The permittee shall furnish to the Director within reasonable time, any information including copies of records, which may be requested by the Director to determine whether cause exists for modifying, revoking, re-issuing, or terminating the permit, or to determine compliance with the permit or these regulations.

2. Both minor and major modifications may be made to this permit as stated in IDAPA 58.01.17.700.01 and 02 with respect to any conditions stated in this permit upon review and approval of the DEQ.

3. Whenever a facility expansion, production increase or process modification is anticipated which will result in a change in the character of pollutants to be discharged or which will result in a new or increased discharge that will exceed the conditions of this permit, or if it is determined by the DEQ that the terms or conditions of the permit must be modified in order to adequately protect the public health or environment, a request for either major or minor modifications must be submitted together with the reports as described in Section I. *Standard Reporting Requirements*, and plans and specifications for the proposed changes. No such facility expansion, production increase or process modification shall be made until plans have been reviewed and approved by the DEQ and a new permit or permit modification has been issued.

4. Permits shall be transferable to a new owner or operator provided that the permittee notifies the Director by requesting a minor modification of the permit before the date of transfer.

5. Any person violating any provision of the Wastewater Reuse Permit Regulations, or any permit or order issued thereunder shall be liable for a civil penalty not to exceed ten thousand dollars ($10,000) or one thousand dollars ($1,000) for each day of a continuing violation, whichever is greater. In addition, pursuant to Title 39, Chapter 1, Idaho Code, any willful or negligent violation may constitute a misdemeanor.

6. The Director may revoke a permit if the permittee violates any permit condition or the Wastewater Reuse Permit Regulations.

7. Except in cases of emergency, the Director shall issue a written notice of intent to revoke to the permittee prior to final revocation. Revocation shall become final within thirty-five (35) days of receipt of the notice by the permittee, unless within that time the permittee request an administrative hearing in writing to the Board of Environmental Quality pursuant to the Rules of Administrative Procedures contained in IDAPA 58.01.23.

8. If, pursuant to Idaho Code, 67-5247, the Director finds the public health, safety or welfare requires emergency action, the Director shall incorporate findings in support of such action in a written notice of emergency revocation issued to the permittee. Emergency revocation shall be effective upon receipt by the permittee. Thereafter, if requested by the permittee in writing, a revocation hearing before the Board of Environmental Quality shall be provided. Such hearings shall be conducted in accordance with the Rules of Administrative Procedures contained in IDAPA 58.01.23.

9. The provisions of this permit are severable and if a provision or its application is declared invalid or unenforceable for any reason, that declaration will not affect the validity or enforceability of the remaining provisions.

10. Any temporary cessation of operations or closure of the facility shall be performed in accordance with IDAPA 58.01.17.801,

11. The permittee shall notify the DEQ at least six (6) months prior to permanently removing any permitted reuse facility from service, including any management unit, monitoring well, treatment, storage, or other facilities or equipment associated with the wastewater collection, treatment, or reuse site. Prior to removal from service, the permittee shall: a) participate in a pre-closure meeting with the DEQ; b) develop a closure plan that identifies specific closure, site characterization, or cleanup tasks with scheduled task completion dates in accordance with agreements made at the pre-closure meeting; and c) submit the completed closure plan to the DEQ for review and approval within forty-five (45) days of the pre-closure meeting. The permittee must complete the DEQ approved site closure plan.

Appendix 1
Environmental Monitoring Serial Numbers

HYDRAULIC MANAGEMENT UNITS

Serial Number	Description	Acres
MU-007501	Pivot #315 (formerly pivot #106)	221
MU-007505	Pivot #303 (formerly pivot #151)	282
MU-007506	Pivot #302 (formerly pivot #152)	226
MU-007507	Pivot #301 (formerly pivot #153)	219
MU-007508	Pivot #300 (formerly pivot #154)	194
MU-007513	Pivot #313 (formerly pivot #210)	120
MU-007514	Pivot #314 (formerly pivot #211)	146
MU-007521	Corner Pivot F (formerly part of MU-007512)	19.5
MU-007522	Corner Pivot G (formerly part of MU-007512)	17.5
MU-007523	Corner Pivot H (formerly part of MU-007512)	17.0
	Total Permitted Acreage:	1,462

1. All per-acre flow and loading calculations or determinations shall be determined using the acreages specified herein. If the actual acreage utilized on any HMU is less than the acreage specified above, then the actual utilized acreage value shall be used in place of the values specified in this Table.

WASTEWATER SAMPLING POINTS

Serial Number	Description
WW-007501	Wastewater Effluent sampling port in plant, downstream of Amiad filters, just prior to exiting building.

SUPPLEMENTAL IRRIGATION DIVERSIONS AND SAMPLING POINTS

Serial Number	Description
SW-007501	Irrigation Well at Pivot #315, MU-007501
SW-007505	Irrigation Well at Pivot #303, MU-007505
SW-007508	Irrigation well at Pivot # 300, MU-007508
SW-007513	Irrigation Well at Pivot # 313, MU-007513
SW-007514	Irrigation Well at Pivot # 314, MU-007514

Appendix 1
Environmental Monitoring Serial Numbers

SOIL MONITORING UNITS

Serial Number	Description	Associated MU
SU-007501	Pivot #315 (formerly pivot #106)	MU-007501
SU-007505	Pivot #303 (formerly pivot #151)	MU-007505
SU-007506	Pivot #302 (formerly pivot #152)	MU-007506
SU-007507	Pivot #301 (formerly pivot #153)	MU-007507
SU-007508	Pivot #300 (formerly pivot #154)	MU-007508
SU-007513	Pivot #313 (formerly pivot #210)	MU-007513
SU-007514	Pivot #314 (formerly pivot #211)	MU-007514
SU-007521	Corner Pivot F (formerly part of MU-007512)	MU-007521
SU-007522	Corner Pivot G (formerly part of MU-007512)	MU-007522
SU-007523	Corner Pivot H (formerly part of MU-007512)	MU-007523

GROUND WATER MONITORING

Serial Number	Common Name(s)	Location
GW-007501	7501 or MW-1 (down-gradient)	W of Pivot #316
GW-007502	7502 or MW-2 (down-gradient)	SW of Pivot #316
GW-007503	7503 or MW-3 (down-gradient)	SW of Pivot #317
GW-007504	7504 or MW-4 (up-gradient)	NE of Pivot #316
GW-007505	7505 or MW-151 Deep (down-gradient)	SW of Pivot #303
GW-007506	7506 or MW-151 Perched (down-gradient)	Adjacent to GW-007505
GW-007507	7507 or MW-152 (down-gradient)	SW of Pivot #302
GW-007508	7508 or MW-154E (up-gradient)	NE of Pivot #300
GW-007509	7509 or MW-106 (up-gradient)	NE of Pivot #315
GW-007510	7510 or MW-153W (down-gradient)	SW of Pivot #301
GW-007511	7511 or MW-154W (down-gradient)	SW of Pivot #300
GW-007512	7512 (facility PWS well)	At Facility
GW-007513	7513 (new up-gradient well, See Section E, CA-075-08)	NE of Pivots #313, 314

Appendix 2
Site Maps

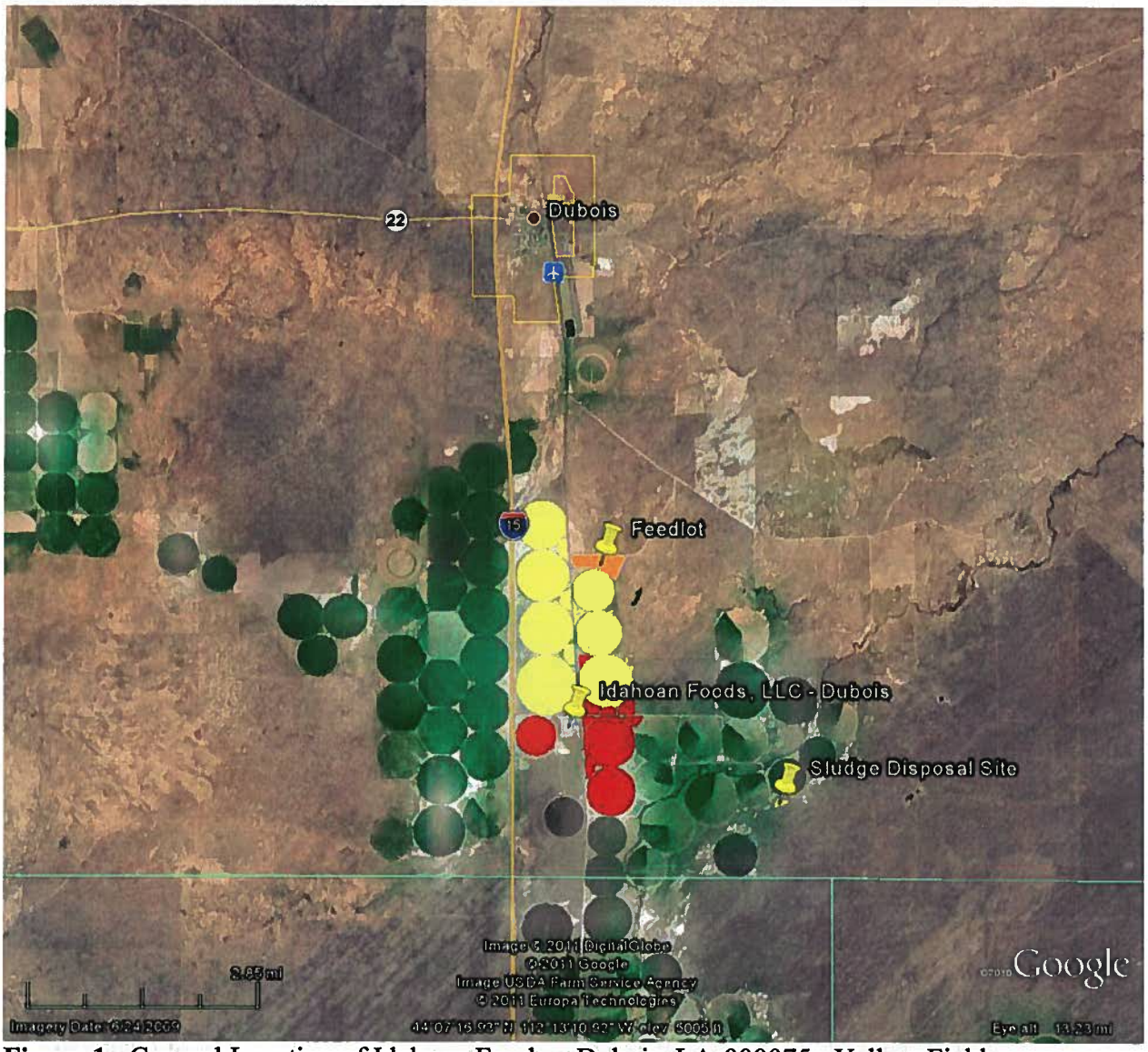

Figure 1. General Location of Idahoan Foods – Dubois, LA-000075. Yellow Fields are proposed for new permit LA-000075-04. Red Fields are currently permitted under LA-000075-3 and are proposed for removal from the new permit. Red fields will revert from Idahoan Foods control back to the land owner Larsen Farms for Larsen's agronomic purposes.

Appendix 2
Site Maps

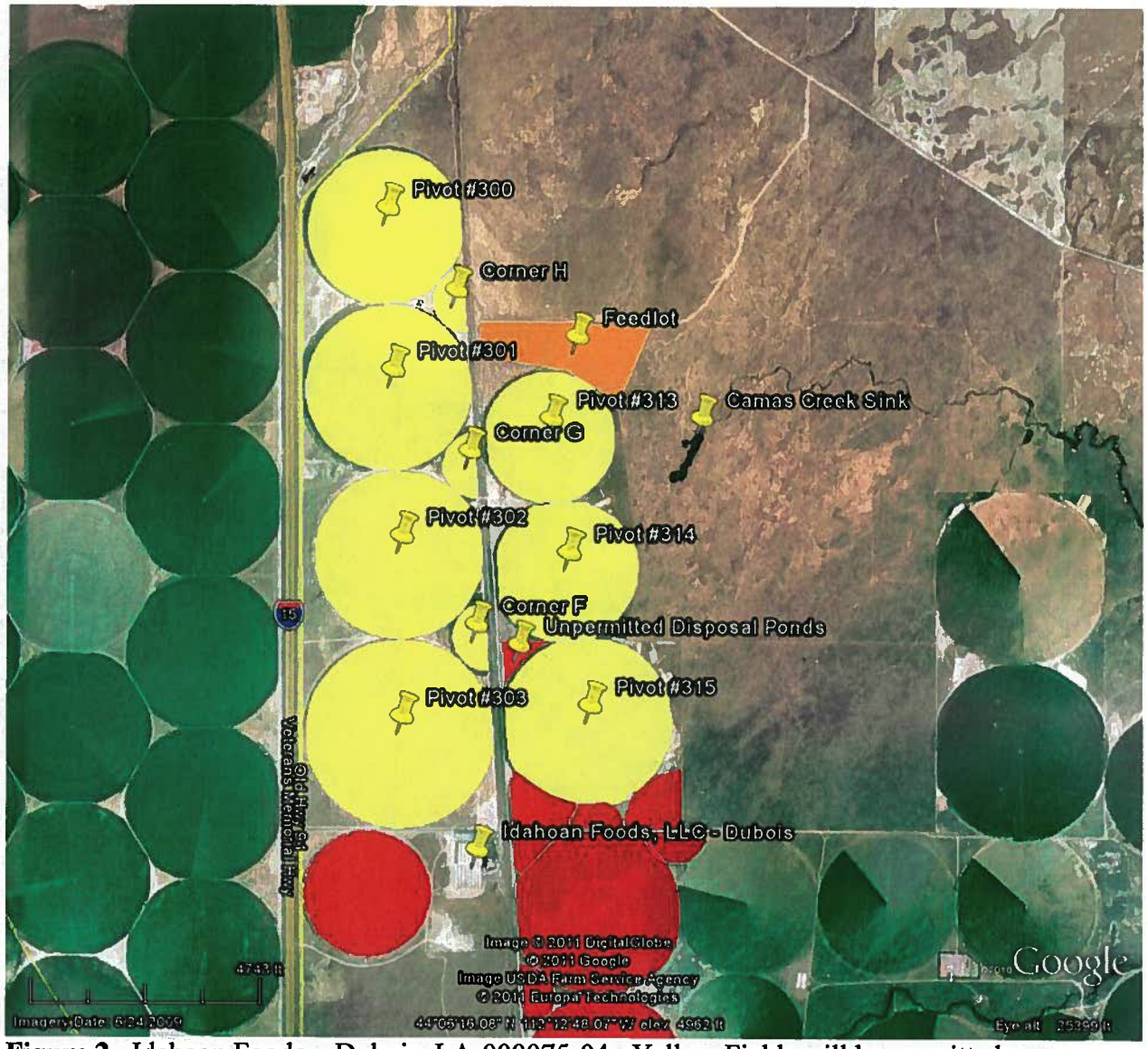

Figure 2. Idahoan Foods – Dubois, LA-000075-04. Yellow Fields will be permitted. Red fields will be removed from new permit (not permitted). Ground Water generally flows south-southwest.

Appendix 2
Site Maps

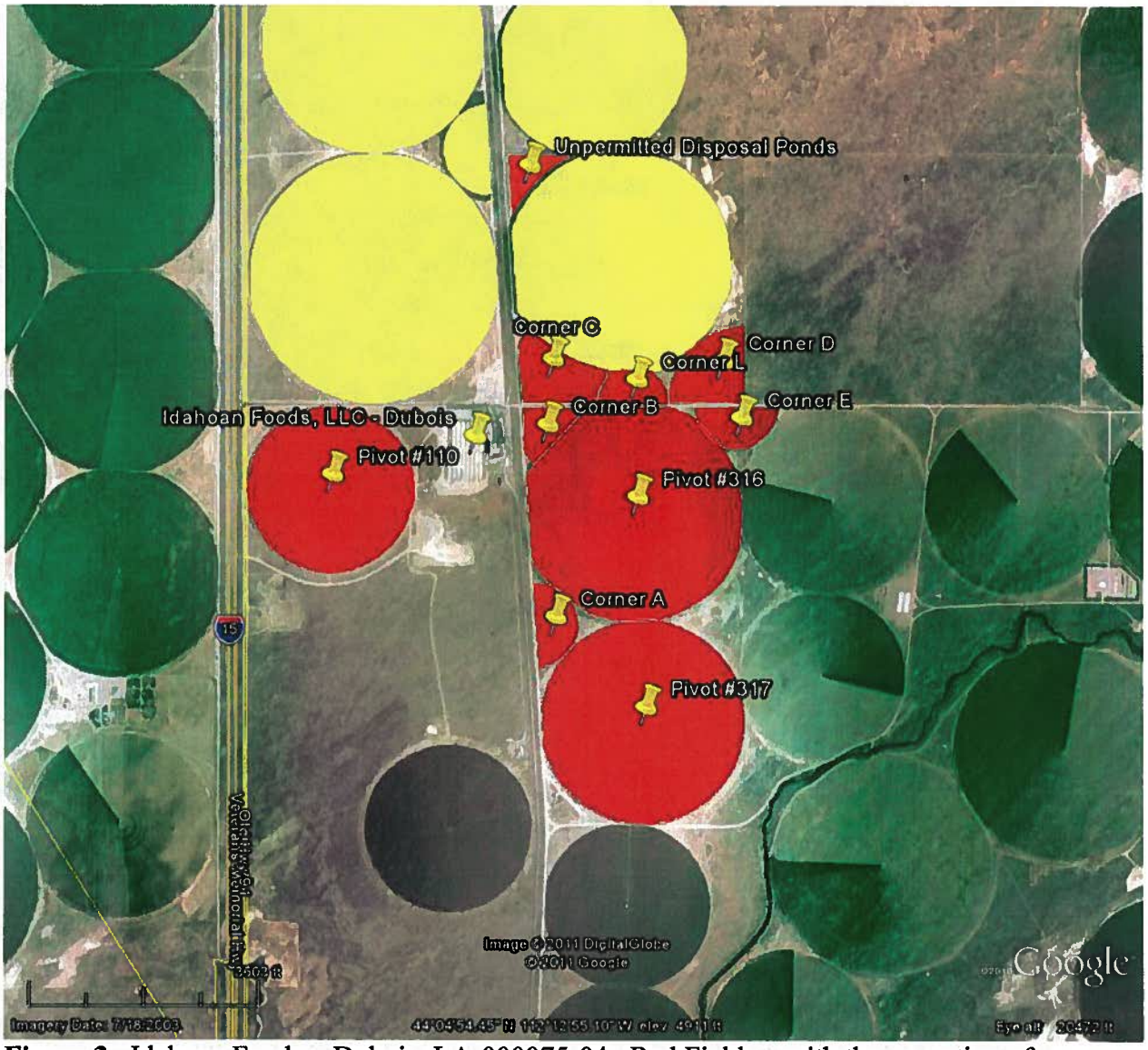

Figure 3. Idahoan Foods – Dubois, LA-000075-04. Red Fields – with the exception of Pivot #110 – are removed from new permit and will revert to Larsen Farms control for agronomic purposes. Pivot #110 has never been permitted for wastewater land treatment.

Appendix 2
Site Maps

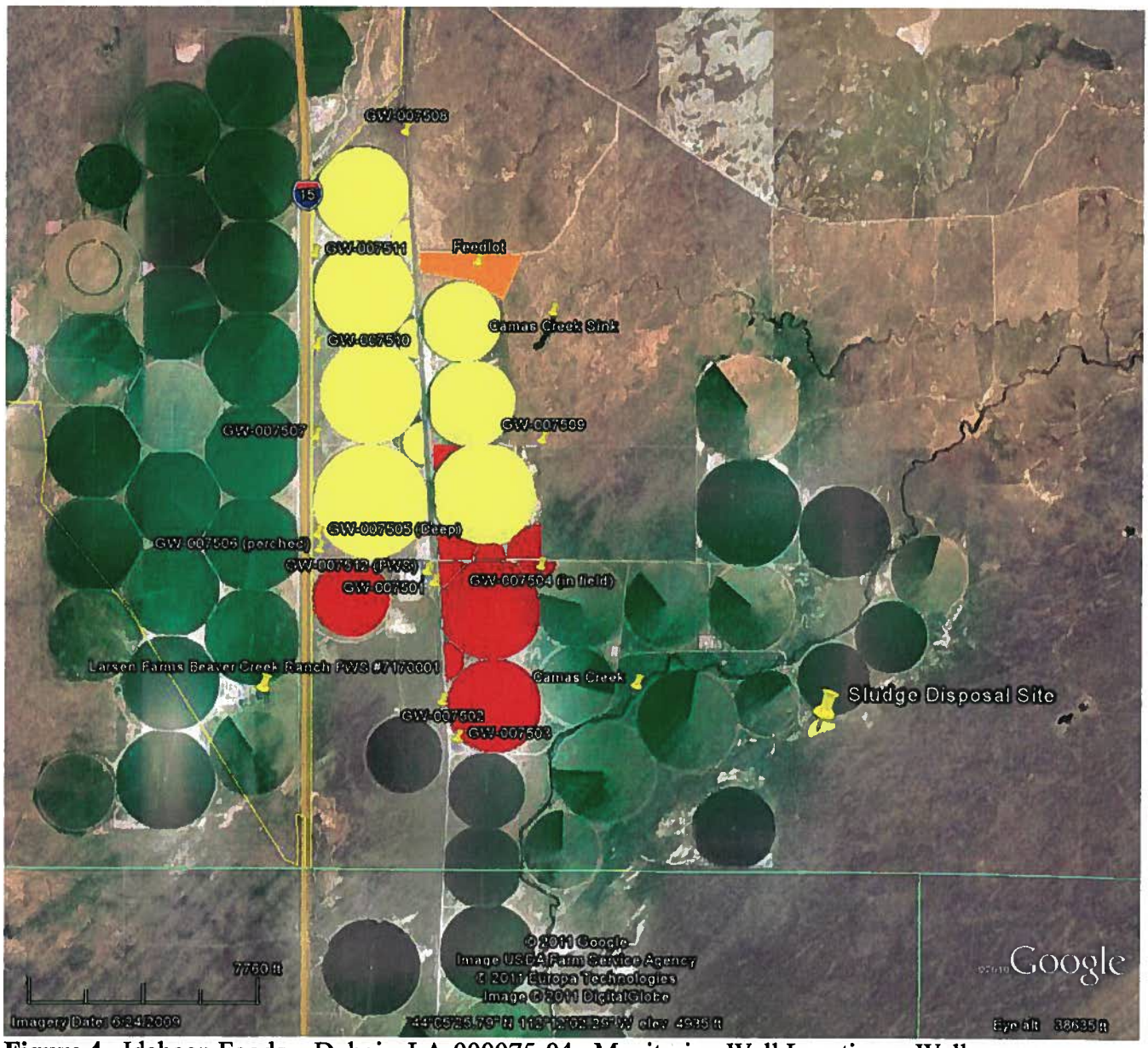

Figure 4. Idahoan Foods – Dubois, LA-000075-04. Monitoring Well Locations. Well Locations shown here are approximate.