



Water for Citizens of Weed, California (WCWC)
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Public Comments for NCRWQCB Meeting on August 20, 2020

Crystal Geyser Roxane's Waste Water in Weed, CA (Shasta/Klamath basin)

These comments are submitted on behalf of Water for Citizens of Weed, California, an association of citizens working to protect the water resources upon which our community has long depended.

We would like to raise the issue of waste water discharges from the Crystal Geyser Roxane (CGR) facility in our community of Weed in Siskiyou County. Weed is located in the upper reaches of the Shasta River watershed. As you know, the Shasta River is a critical tributary to the Klamath River, providing water so rich and cold its gaining status as a salmon stronghold. And, as underscored by Jared Huffman the day before yesterday in his congressional briefing, the Klamath River needs all of the clean, cold water it can get.

In 2018, an adjoining neighbor in Weed discovered that CGR had, without permission or authorization, been dumping its wastewater into a holding tank that consistently overflowed, sending wastewater off its property and into Black Butte Creek, a Boles Creek (Shasta/Klamath watershed) tributary.¹ CGR had to immediately cease this practice and start sending its wastewater into the City of Weed's sewer system for treatment.

This has placed a significant burden on the City's wastewater treatment system. It is our understanding that this amount of discharge was never anticipated nor planned for when CGR established operations in Weed.

Reportedly due to the cost associated with using the City wastewater treatment system (which needs a significant upgrade to handle CGR's wastewater in the long-term), CGR has indicated to the City of Weed that it is planning on building a new leach field for its wastewater.

The proposed edge of this leach field is only 250 feet away from the City's Mazzie Well, a significant source of domestic water for the City of Weed. In November, 2019, CGR went to the City for tree-cutting permits and an easement for the proposed leach field—but appears to have neglected to first apply to the NCRWQCB, which we understand would need to permit such a leach field. At the Weed Planning Commission meeting, no discussion of the close proximity of the leach field to the Mazzei well took place. The Planning Commission approved the permit, but, as far as we know, CGR, still has not applied to the NCRWQCB for the required permit and to initiate an environmental review.

In recent years this same company has been involved in two major scandals, one involving the illegal handling of toxic arsenic-laced wastewater from its Olanca, CA facility (to which it pled guilty), the other revealing serious ethical lapses at a proposed water bottling location in Washington State.

A Public Records request from WCWC to the NCRWQCB earlier this year revealed that a number of dangerous chemicals (see attached sheet) are to be disposed of in this leach field.

Given the proximity of this proposed leach field to an important City water source, the presence of dangerous chemicals in the waste water, the large amount of wastewater involved and CGR's poor ethical track record at other water bottling facilities, we view the development of this leach field as a cause for great concern--a threat to both our City water supply and to water quality in the Boles/Shasta/Klamath basin.

We would like to bring this issue to the attention of the NCRWQCB and ask for an investigation of the situation.

CGR should not be permitted to move forward with this leach field proposal. Instead we propose that CGR either scale back production to operate within the parameters of their original agreement, or be mandated to pay for a major upgrade of the City of Weed's wastewater treatment and monitoring systems so that its waste water can be properly and safely treated.

Thank you.
