



November 22, 2010

Via electronic message

Brianna Bergen, Engineering Geologist
California Regional Water Quality Control Board
14440 Civic Drive, Suite 200
Victorville, CA 92392

Subject: Design Plan - Redesign of Berm Additional Information
Nursery Products Hawes Composting Facility

Dear Ms Bergen:

This letter submits additional information regarding the Nursery Products Hawes compost facility (Facility) based upon comments received orally from Harold Singer. The background to those comments is as follows. On August 11, 2010, Nursery Products submitted the Design Plan Addendum in response to comments from the California Regional Water Quality Control Board, Lahontan Region (Water Board) received in July, 2010. On October 7, 2010 the Water Board submitted comments on the *Design Plan Addendum*, which requested additional information in regard to the overflow area at the Facility. On October 14, 2010 and October 26, 2010 Nursery Products submitted additional explanation of the Design Plan Addendum clarifying that all the structures and equipment that will be located in the 'overflow' area are mobile and that any vehicles, tanks, onsite equipment, compost and the temporary office could be relocated out of the overflow area readily and promptly. By electronic message dated October 26, 2010 the Water Board expressed concern that a 1000-year, 24-hour storm event could theoretically occur when employees are not on the Facility and thus challenged the efficacy of the plan to relocate any compost that might be located within the 'overflow' area. On November 1, 2010, Nursery Products submitted a letter indicating that the 'overflow' area elevation would be increased by 1.55 inches to account for any compost that could be located in the overflow area on those occasions when the facility is operating at full capacity. On November 10, 2010, the Water Board requested a map showing the changes to the berm elevation and also requested that the map be certified by a Professional Engineer.

As a result of the redesign, the volume of the 'overflow' areas will be expanded to include any compost that could be located in the overflow area on those occasions when the facility is operating at full capacity. The 'overflow' area will only contain compost when the Facility is operating at full capacity and then it can only contain a maximum of 17,000 cubic yards of compost windrows. These windrows would displace 2,843 cubic yards within the depth considered in the 'overflow' area. This volume is based upon the typical size and dimension of windows as described in our

submittal of October 14, 2010. The Nursery Products Design Plan submitted August 11, 2010 established a minimum elevation height of 2317.14 feet for the berm around the overflow area "A" (7 acres) which is located on the west side of the Facility and established a minimum elevation height of 2318.41 feet for overflow area "B" (6.7 acres) which was on the east side of the Facility. It's important to remember that notwithstanding the added berm height surrounding the 'overflow' area, the entire site will be surrounded with a one foot berm. In addition, and as shown on the maps provided including the attachment hereto, the site will be graded with the lower areas in the north (where the 'overflow' area is located). Please carefully consider the elevation relationship between the one foot berm and the raised berm that surrounds the 'overflow' area. The Water Board questions about the berm height seem to indicate a misunderstanding of the site grade, one foot berm and elevated berm for the 'overflow' area. Clearly, at a location very close to the southern end of the 'overflow' area, the one foot berm will surpass the added berm needed to contain the 1000 year, 24 hour flood. It is our belief that in its review the Water Board has consistently overlooked that transition point because the 'overflow' area as proposed by Nursery Products in the Design Plan Addendum already surpassed the added volume that may arise when any compost comes to be located in the 'overflow' area. Nonetheless, Nursery Products will raise the berm elevation by 1.55 inches for area "A" and 1.55 inches for area "B" which will change the minimum berm elevations to 2317.27 feet and 2318.54 feet respectively. The higher berm heights will add an additional volume of 2,854.9 cubic yards (13.7 acres X 1.55 inches) to the 'overflow' area behind the berms.

Please provide a letter confirming that the Design Plan is acceptable with this change.

If you have any questions please feel free to call me to discuss at 760-272-1224.

Sincerely,



Chris Seney, P.E.

cc: Jeff Meberg
Lynda Brothers

Enclosures: P.E. Certification Letter
Map

AEI-CASC CONSULTING

November 22, 2010

Mr. Chris Seney, P.E.
Nursery Products
12277 Apple Valley Road, Suite 131
Apple Valley, CA 92308

Subject: 1,000-year Berm Redesign to Account for Compost in 'Overflow' Area
Nursery Products Hawes Composting Facility

Dear Mr. Seney:

This letter certifies that AEI-CASC has reviewed and approved the redesign of the 1,000-year berm to account for compost that potentially could be in the 'overflow' area. My seal as a registered professional engineer licensed in the State of California is affixed below.

If you have any questions regarding this report, please call me at (909)709-4393.

Sincerely,


Ceazar Aguilar, P.E.
Principal Engineer
AEI-CASC Consulting

CVA/rc



REV	DESCRIPTION OF REVISION	BY	DATE
1	ISSUED FOR CONSTRUCTION	JLN	11-10-10
2	ISSUED FOR CONSTRUCTION	JLN	04-01-10



URS
 1815 Market Street, Suite 1000
 San Diego, California 92108

PROJECT NO.	1815037.00100
DESIGNED BY	JLN
CHECKED BY	LJM
PROJECT MANAGER	DEW
DATE	11-10-10

HAWES COMPOSTING FACILITY
 SAN BERNARDINO COUNTY, CA
 REVISED 1,000 YEAR
 FLOOD RETENTION BERM

REVISION	NO.
1	2
2	6

