



October 25, 2010

Mike Plaziak, PG
Supervising Engineering Geologist
California Regional Water Quality Control Board
14440 Civic Drive, Suite 200
Victorville, CA 92392

Subject: Design Plan - Additional Explanation
Nursery Products Hawes Composting Facility

Dear Mr. Plaziak:

On August 13, 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 Nursery Products Hawes compost facility (Facility). On October 14, 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. On October 20, 2010 by telephone the Water Board requested additional information regarding any compost that might be located in the overflow area at the time of a 1000-year, 24-hour storm event.

The 'overflow' area is the last physical area of the Facility where compost will be located. Hence this area will only contain compost when the facility is operating at full capacity. At most the 'overflow' area could contain 17,000 cubic yards of compost, which is approximately four percent of the expected annual maximum throughput. In the unlikely event that a 100-year, 24 hour storm occurs when the Facility is operating at full capacity, the compost in the 'overflow' area can easily and readily be re-located to other portions of the Facility. Attached to this letter is the Hydrology Map of the Facility showing the 'overflow' area. Functionally, the 'overflow' area is divided into two areas. The attached Map identifies the green section. This area will never under any circumstances contain compost and will be the first area impacted by storm water as a storm exceeds the 100-year, 24-hour storm and may begin to escalate to a 1000-year, 24-hour storm. The red section on the attached Map is the only portion of the 'overflow' where compost could potentially be located when the Facility is at full capacity. It is highly unlikely that compost will be placed in the 'overflow' area. However, if the Facility reaches the maximum throughput compost may be located in the red section of the 'overflow' area. It has been calculated that a maximum of 17,000 cubic yards of compost could be located in the red section. This amount of

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compost in windrows would displace 2,843 cubic yards in the red section of the 'overflow' area and this displaced amount was included in the calculations for the Design Plan Addendum.

In addition, any compost in the red section of the 'overflow' area could be removed to the remainder of the site in less than forty-five minutes. A conservative calculation of the time to remove the 17,000 cubic yards of compost from the red area of the 'overflow' area is forty minutes. This calculation is based on six front end loaders with 8 yard buckets each moving 9 loads per minute for a total of 40 minutes. The onsite equipment could move the compost more quickly dependent upon the distance that the compost is being moved. Forty minutes provides a large margin when one recalls that a storm event would need to first surpass the 100 year, 24-hour storm, then surpass the capacity of the green section of the 'overflow' area and only then impact the red section where the compost could be located if the Facility were operating at full capacity. Nursery Products will have ample opportunity to remove any compost in the red section of the overflow area should these storms events occur.

Nursery Products respectfully requests a response from the Water Board approving the Design Plan for the Hawes Composting Facility at your earliest convenience, but in any case not later than October 30, 2010. If this date cannot be met, please contact me immediately.

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

Sincerely,



Chris Seney, P.E.

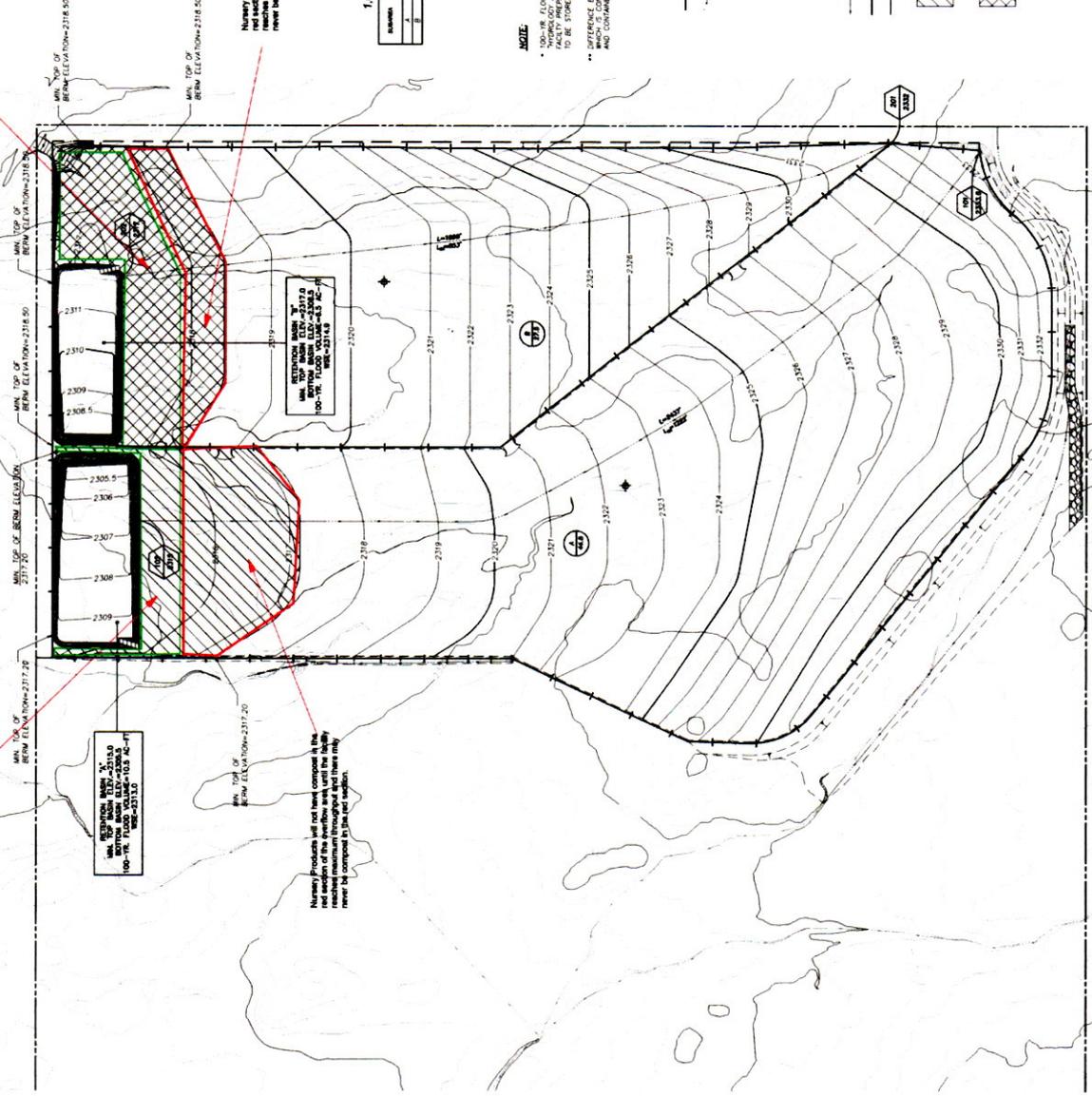
Enclosures: Map

cc: Brianna Bergen

COUNTY OF SAN BERNARDINO ON-SITE HYDROLOGY MAP NURSERY PRODUCTS HAWES COMPOSTING FACILITY

Nursery Products will not have compost in the red section of the overflow area. The green section of the overflow area.

Nursery Products will not have compost in the green section of the overflow area.



1,000-YEAR HYDROLOGY DATA

STATION	NO. OF PLOTS	RETENTION BASIN AREA (AC)	RETENTION BASIN VOLUME (AC-FT)	100-YR FLOOD VOLUME (AC-FT)	100-YR FLOOD VOLUME (AC-FT)	NET 100-YR FLOOD VOLUME (AC-FT)
A	1,077	4.5	25.3	25.3	25.3	0.0
B	2,502	27.3	14.3	14.3	14.3	0.0

Nursery Products will not have compost in the red section of the overflow area. The green section of the overflow area.

Nursery Products will not have compost in the green section of the overflow area. The red section of the overflow area.

NOTE:

- 1. FLOOD VOLUME ESTIMATED FROM PREVIOUS STUDIES. ENTIRE FACILITY PREPARED BY AEC CONSULTING, DATED APRIL 27, 2008.
- 2. FLOOD VOLUME ESTIMATED FROM PREVIOUS STUDIES. ENTIRE FACILITY PREPARED BY AEC CONSULTING, DATED APRIL 27, 2008.
- 3. DIFFERENCE BETWEEN 100-YR AND 10-YR FLOOD VOLUME AND CONTAINED WITHIN THE COMPOST AREA OF THE PROJECT SITE.

LEGEND:

- 100-YR FLOOD VOLUME
- 10-YR FLOOD VOLUME
- RETENTION BASIN
- MAIN FLOW PATH
- FLOW DISTANCE MEASURED USING PARALLEL LINE METHOD OF CENTERLINE
- MAIN CENTERLINE
- FLOW PATH
- WATERSHED SUB-BOUNDARY
- PROJECT BOUNDARY
- SURFACE RETENTION AREA AVAILABLE: 1,000-YR AND 100-YR FOR SUB AREA "A"
- SURFACE RETENTION AREA AVAILABLE: 1,000-YR AND 100-YR FOR SUB AREA "B"

