



California Regional Water Quality Control Board
Lahontan Region



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July 2, 2010

WDID No. 6B360903006

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PRELIMINARY CLOSURE AND POST-CLOSURE MAINTENANCE PLAN, NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO COUNTY

California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received on May 5, 2010, the above referenced document, which was prepared by Nursery Products. The objective of this report is to provide a reasonable estimate of the maximum expected cost that would be incurred to close both the Waste Pile and the two Surface Impoundments. Water Board staff have reviewed the above referenced report and determined that this document does not comply with California Code of Regulations (CCR), title 27, section 21769, subdivision (b).

As submitted, the Preliminary Closure and Post-Closure Maintenance Plan (PCPCMP) proposes to clean-close the Facility upon termination of operations, in accordance with CCR, title 27, section 21400 and section 21410 requirements. This will be accomplished by decommissioning and removal of the structures and restoration of the site. Water Board staff provides the following specific comments regarding the submitted PCPCMP.

1. Section 3.2, Regulatory Requirements, PCPCMP, indicates that closure of the Surface Impoundments and Waste Pile is to be done in accordance with California Code of Regulations (CCR), title 27, section 21400. However, this section only applies to closure of Surface Impoundments. As specified in Board Order No. R6V-2010-0010, Waste Discharge Requirements, Section IV. C., Closure Plan, closure must be conducted in accordance with CCR, title 27, section 21400 and section 21410, applicable for Surface Impoundments and Waste Piles, respectively. These two sections should also be referenced in addition to CCR, title 14, section 17870 in Section 7.1, General, of the PCPCMP. Please revise accordingly.
2. Section 7.4, Final Grading, PCPCMP, indicates that no vegetation is planned for the site, which conflicts with Section 2.9, Post-Closure Land Use, of the PCPCMP, that states "after closure, the surface impoundments and waste pile will be returned to the native drought-tolerant vegetation to prevent erosion and protect public health and safety." As part of the closure activities at the Facility, the site should be stabilized to prevent erosion and to protect public health, safety, and the environment. Please clarify the apparent discrepancy.
3. The closure cost estimates provided in the PCPCMP indicate that one groundwater monitoring well is to be removed as part of the closure activities. However, at a

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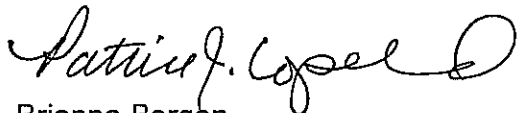
minimum, at least three monitoring wells are required to be installed and monitored at the Facility and one production well will be installed to provide water, as necessary, to the Facility. The PCPCMP neglects to address well abandonment or well destruction for monitoring wells and the production well. Please include costs for well abandonment/destruction in the PCPCMP. These costs must be modified to include an actual representation of the materials to be on-site at the time of closure.

4. The Barstow Landfill is selected as a disposal location for the demolition waste. The waste generated at the site is designated waste and must be disposed of at a Class II Waste Management Unit. Barstow Landfill is not an appropriate Waste Management Unit for disposal of designated waste. These costs must be modified to include costs for disposal at an appropriate waste management unit.
5. Section 5.5, Restoration of Grades, PCPCMP, states that "restoration of grades will be conducted ... in accordance with the closure CQA plan." While a preliminary closure CQA plan was submitted in the PCPCMP, a final closure CQA plan must be submitted with the Final Closure Plan. Please note that Board Order No. R6V-2010-0010, Waste Discharge Requirements, Section IV. C., Closure Plan, specifies that the Final Closure Plan "must be submitted at least 140 days prior to beginning any partial or final closure activities, or prior to discontinuing the use of the Facility for waste treatment, storage, or disposal."
6. Section 2.7, Groundwater Hydrology and Quality, last paragraph, PCPCMP indicates that water quality goals defining background water quality were provided in Table 4 of the geotechnical report included in the Report of Waste Discharge. However, this was based on a singular sample. This is insufficient to define water quality goals for background water quality. A Water Quality Protection Standard, including values for the background water quality, must be determined following at least eight consecutive quarters of groundwater quality data sampling and analysis, per Section V.E. of the Order.

Please address these comments and submit a revised PCPCMP by **July 30, 2010**.

We look forward to working with you in a manner that protects water quality. If you have any questions, please contact me at (760) 241-7305 (bbergen@waterboards.ca.gov) or Patrice Copeland at (760) 241-7404 (pcopeland@waterboards.ca.gov).

Sincerely,



for. Brianna Bergen
Engineering Geologist

cc: Mailing List

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