California Regional Water Quality Control Board
Lahontan Region

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Governor

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REVISED DESIGN PLAN, NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO COUNTY

On March 17, 2011, California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received a revised Design Plan (Plan), which was prepared by Geosyntec and submitted on behalf of Nursery Products. The Plan was submitted to satisfy Board Order No. R6V-2010-0010, and was submitted in response to Water Board staff comments provided on December 24, 2010, on the prior submittals of the Plan submitted to the Water Board between May and November, 2010.

Based on the information provided and previous Water Board comments on the Plan, Water Board staff conceptually accept the Plan provided the following comments are addressed.

Surface Impoundment Diversion Berms

Section 3.3.3, Surface Impoundment Diversion Berm: Nursery Products proposes to construct the internal Surface Impoundment diversion berm by incorporating three openings to direct the discharge from the 100-year, 24-hour storm event from the site into the Surface Impoundments. A 20-foot opening will be incorporated into the western Surface Impoundment diversion berm, and two 10-foot openings will be incorporated into the eastern Surface Impoundment diversion berm. When water in the Surface Impoundments approaches the two-foot freeboard level, stop logs made of either aluminum or stainless steel will be **manually** placed perpendicular to flow, in line with the diversion berms, such that flow of water from the Waste Pile area will not be allowed to discharge into the Surface Impoundments. These stop logs will be stored on site at the office.

The Water Board believes this strategy is an acceptable means to isolate the Surface Impoundments when needed to maintain the required freeboard. It is essential that Nursery Products develop an operational plan that specifically addresses procedures to monitor the freeboard in the Surface Impoundments on a 24-hour, 7-day basis when

extreme precipitation events are predicted and to have sufficient and appropriately trained personnel on site to place the stop logs if Surface Impoundment freeboards dictate the need to isolate the impoundments. The Water Board will ask to review this operational plan and to observe the **manual** placement of the stop logs once construction is completed but before waste is accepted at the facility.

The Water Board seeks clarification of the following:

1. Section 7 on Sheet 9 of 9 depicts the top of the stop logs to be at the same elevation as the top of the diversion berms. However, this diagram is not to scale and no sizes or other information could be found to compare the top elevation of the stop logs with the top elevation of the diversion berms. Please confirm that the top elevation of the stop logs is at least equal to the top elevation of the diversion berms.

2. Note 1 on Sheet 9 of 9 asserts that the stop logs will be made of one piece, while Section S on Sheet 9 of 9 appears to show multiple logs stacked on top of each other. Please clarify this discrepancy.

3. Note 4 on Sheet 9 of 9 states "The bottom of the stop log shall provide a flush bottom seal and along guide frame surface to provide a proper seal at the stop log contact surfaces and at the corners." The details of Sheet 9 of 9 show a neoprene seal where the stop logs fit into the side frames. However, there were no details regarding whether or not Nursery Products will provide a similar seal between the stop logs and the concrete apron to coincide with the description in Note 4. Without a neoprene seal, which we presume would be attached to the bottom of the stop log, it is unclear how water will be prevented from passing between the stop logs and a concrete apron, which is unlikely to be as smooth and straight as the metal stop log. Please clarify what is intended.

4. The Water Board comment letter, dated December 24, 2010, requested information regarding how flows will be directed through the openings in the diversion berms without causing erosion and possibly destabilizing the liner. It is noted in Detail R on Sheet 9 of 9 that a concrete apron is proposed for the area that is open to water flow through the diversion berms. However, as precipitation, especially during short duration – high intensity storms, falling on the larger site area is directed to the three openings it will increase in velocity across the concrete apron before it comes in contact with the compacted soil between the berm openings and the surface impoundment. This situation could result in the erosion and scour of the soil on the downstream side of the openings possibly leading to destabilization of the edge of the surface impoundment liner which is buried in this area. California Code of Regulations (CCR), title 27, section 20365, subdivisions (c) (3) and (f) require the prevention of surface erosion of drainage facilities. Please describe measures to prevent soil erosion and/or scour on the downstream side of the openings of the diversion berm concrete apron to prevent conditions that could undermine the integrity of the surface impoundment liner.

Lysimeters

The Plan (Sheet 2 of 9) shows the locations of the lysimeters locations to be at approximately the middle of each Surface Impoundment. The purpose of the lysimeter is to detect a leak from the lowest-most liner of the lowest-most point of the Surface Impoundments, where the largest head would exist, and thus the greatest risk of downward migration of material through the liners. This location is beneath the leak detection sumps which are not in the middle of the Surface Impoundment. Please justify the proposed location of the lysimeters or propose more appropriate locations for the lysimeters.

Until the requested information is submitted and accepted, the Design Plan is not considered complete. Any construction activities implementing the Design Plan prior to final approval are done at the risk that the work plan may need modification to be consistent with the accepted final design plan.

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

Sincerely,

Harold J. Singer

HAROLD J. SINGER
EXECUTIVE OFFICER

cc: Mailing List

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