California Regional Water Quality Control Board
Lahontan Region

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DESIGN PLAN, CONSTRUCTION QUALITY ASSURANCE PLAN AND TECHNICAL SPECIFICATIONS, NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO COUNTY

On May 5, 2010, the California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received the above referenced document, which was prepared by Nursery Products. The objective of this plan is to describe and specify the design of the Facility, including a design capacity for containing the runoff within the Facility for a 1,000-year, 24-hour storm event; the design of the Facility's exterior berm designed to divert stormwater run-on away from the Facility; the Leak Detection Monitoring Sumps (LDMS); the unsaturated zone monitoring system; and the groundwater monitoring system and well locations. This Design Plan, Construction Quality Assurance Plan & Technical Specifications (Design Plan) was submitted to satisfy Board Order No. R6V-2010-0010. Water Board staff have reviewed the above referenced plan; the plan fails to meet the requirements stated in Board Order No. R6V-2010-0010 for the following reasons.

Compliance with Board Order

Section V. C. 1., Facility Design Plan. The design plan must specify how the Surface Impoundments and Waste Piles can contain the precipitation volume from a 1,000-year, 24-hour storm event. The Design Plan does not define or describe a capacity required or the dimensions to justify the volume calculated for the design storm. Therefore, the Design Plan fails to meet the requirements set forth in the Board Order and California Code of Regulations (CCR), title 27, section 20320(e).

While volume calculations are provided, there are no details provided to verify the volume of the Surface Impoundments are sufficient to contain both the volume of the 100-year storm from the Facility in addition to the volume of the 1,000-year storm event that falls directly onto the Surface Impoundments. No details are provided on the size of the berms, the dimensions of the Surface Impoundments, or the depth of the Surface Impoundments.

The Design Plan indicates that a gate system will be used to ensure the 100-year storm flow volume from the Facility will be separated or diverted from the 1,000-year flow volume. However, no information is provided regarding the design, operation, and function of these gates.

Overflow Area Description

No details are provided on the area to hold the difference between the 100-year storm event and the 1,000-year storm event that is not to be contained in the Surface Impoundments. There are no calculations provided to justify that the area is sufficient to contain the required volume of stormwater. It appears that there is no freeboard for the area to capture this volume. However, as specified in Section II.B.1. of the Board Order, overflow structures must maintain two feet of freeboard. Additionally, it was not demonstrated that the overflow area has sufficient hydraulic conductivity to prevent percolation.

The area designated to be the overflow area appears to be the area where buildings, vehicle parking, compost piles, and above-ground storage tanks will be located. This will not only affect the volume calculations, but will also impact the operation of the Facility. A structure that appears to be a ramped driveway is present at the northeast corner of the Facility; however, the elevation of the structure appears to be 2317.5 feet above mean sea level (msl), while the elevation of the overflow area reaches an elevation of 2318.14 feet above msl. Incorporating the two foot freeboard requirement, the berm should be at an elevation of no less than 2320.14 feet above msl, but no details and no calculations are provided to verify that the volume of this area is sufficient to contain the difference between the 100-year and 1,000-year storm events. With the driveway at a maximum elevation of 2317.5 feet above msl, this will serve as a drainage point to outlet flows outside of the Facility, which is not in compliance with Section II.A.2, Section II.A.3, and Section II.A.7 of the Board Order.

There are inconsistencies in the drawings presented in the Design Plan. In the drawings presented in the Hydrology Study, Surface Impoundment "A" goes from an elevation of 2305.5 to 2314 feet above msl for the 100-year storm event. The drawings note a berm elevation of 2316 feet above msl to account for the requirement in the Board Order to maintain two feet of freeboard. However, the Hydrology Study notes the elevation at 2320 feet above msl for the 1,000-year event, which would require an elevation of 2322 feet above msl to maintain two feet of freeboard. However, this is a six-foot difference than what the drawings indicate. There are analogous inconsistencies in the drawings presented for Surface Impoundment "B."

Inundation of Wells

Based on review of the proposed locations of the groundwater monitoring wells with the drainage structures, it appears that there is a potential for the Facility's upgradient groundwater monitoring well to be inundated from stormwater. Additionally, the Facility's production well is within the area of overflow and has the potential to also be inundated.

Summary

The Plan presented is not in compliance with Board Order No. R6V-2010-0010. Please revise and resubmit the Design Plan in accordance with Board Order No. R6V-2010-0010 by **August 13, 2010**. The plans must specify design dimensions, provide drawings to scale, and provide calculations to justify the volumes of the containment structures, as well as address all of the comments presented herein.

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,

Patrice Copeland, PG
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cc: Mailing List

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