



**California Regional Water Quality Control Board  
Lahontan Region**



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**MONITORING AND REPORTING PLAN & SAMPLING AND ANALYSIS 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 these plans is to specify procedures for monitoring and reporting as well as procedures for sampling and analysis of the Waste Pile, Surface Impoundments, Leak Detection Monitoring Sumps (LDMS), unsaturated zone monitoring system, groundwater monitoring wells, native background soils, and odor at the Facility. This Monitoring and Reporting Plan (MRP) and Sampling and Analysis Plan (SAP) or (MRP&SAP) was submitted to satisfy Board Order No. R6V-2010-0010. Water Board staff have reviewed the above referenced plan and determined that the plan fails to meet the requirements stated in Board Order No. R6V-2010-0010.

**General Comments**

The MRP&SAP, like other written plans and procedures, should be sufficiently detailed such that in the event regular Facility personnel are unable to perform their regular duties, qualified backup personnel can perform those duties by following the procedures in the plans without a disruption in operation, monitoring, or sampling. Normally, each plan (MRP and SAP) are stand-alone documents that are submitted together in one binder. Our expectation is that Nursery Products staff will revise this submittal and provide individual plans for monitoring (MRP) and sampling (SAP), as each activity merits separate plans. Both plans can then be resubmitted as one submittal. Examples of other such plans have been provided to you.

Procedures for determining which locations from the Waste Pile (compost pad) are to be sampled are not specified, nor are detailed methods for sample collection (e.g., hand auger, direct push, stainless steel sleeve, EnCore samplers, plastic scoops). Similarly, a narrative description of the manner and method in which samples are to be collected from the Surface Impoundments and the LDMS is not provided. Adequate details need to be provided to clearly demonstrate the manner and method in which both monitoring and sampling will be conducted at the Facility. The following are additional specific comments.

***California Environmental Protection Agency***

## Compliance with the Board Order

As submitted, the combined plan (MRP&SAP) fails to specify specific parameters and methods to be followed during the monitoring of the Facility.

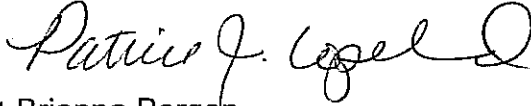
1. Section 3.1, Monitoring Well Installation, of the MRP&SAP describes that during well development, "water quality parameters such as pH, turbidity, specific conductance, and temperature will be monitored;" however, the MRP&SAP fails to specify limits for these parameters at which the well would be defined as "developed."
2. Section 3.1.2, Groundwater Monitoring and Sampling, of the MRP&SAP indicates that the wells will be purged of three borehole volumes, and temperature, pH, and conductivity will be monitored during purging to document the flow has stabilized prior to sampling. However, the wells should be purged of at least three volumes and the SAP should specify the frequency at which the samples will be collected as well as the limits for the parameters at which the well would be considered "stabilized."
3. Section 3.11, Dust Control, of the MRP&SAP indicates that windrows more than 30 days old will be monitored for moisture. However, Section II.F.3. of Monitoring and Reporting Program No. R6V-2010-0010 specifies that moisture will be determined at "each windrow," not just those windrows that are over 30 days old. Please revise the MRP&SAP, as applicable, to comply with the Order.

## Monitoring Well Installation

1. Section 3.1.1, Monitoring Well Installation, of the MRP&SAP does not specify where the drill cuttings, drilling fluid, and development water are to be disposed. The description of the monitoring well construction is not clear. However, Note 9 on Appendix A, groundwater monitoring well typical schematic, indicates that a well construction workplan is to be submitted for Water Board staff review prior to construction. This information should be clarified and included in the revised plans.
2. Monitoring wells planned for the Facility are described as being installed upgradient (MW-1) and downgradient (MW-2 and MW-3) of the Facility. However, as only a general regional groundwater flow direction is currently known, the site-specific groundwater flow direction must first be determined. It is likely that **more** than the minimum number of wells may be needed to adequately characterize the groundwater beneath this Facility. The Monitoring and Reporting Plan should include the rationale for the proposed monitoring well network to meet the Board Order and CCR, title 27, section 20415 requirements.

Please revise these Plans and submit them at least **60 days** prior to operation of the Facility. 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](mailto:bbergen@waterboards.ca.gov)) or Patrice Copeland at (760) 241-7404 ([pcopeland@waterboards.ca.gov](mailto:pcopeland@waterboards.ca.gov)).

Sincerely,



*for:* Brianna Bergen  
Engineering Geologist

cc: Mailing List

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