



First, I am shocked the comment period was open until September 12 at noon on September 11, 2012; I received the email shortly before 8 am on September 11, 2012; this notice is insufficient and is the stuff that shows public input was not welcomed, if the choice of the meeting location, for us in Southern California was not (where we have a super sludge to compost operation underway in San Bernardino County--the Nursery Products operation)

Second, the report is silent as to WHAT testing standard is going to be used--e.g. what levels will the chemicals and various waste byproducts be tested to; new public health stds or old EPA stds?

Third, there should be background testing of the water below BEFORE testing of the chemicals in the dumped material

Fourth, the testing for new projects in remote areas where there is not prior oversight activity, should be done on a per truck load load basis especially in pristine areas, and not semi annually or annually [reference B(1)(b)]; an environmental disaster can have been put into motion with only a few weeks of dumping the wrong load mix (e.g. mercury and other heavy metals);

Fifth, the records on loads should be kept long past 5 years; if something shows up, the records are needed to show any negligence or fraud that might have accompanied the transport of loads; 5 years may be fine for administrative norms, but toxic dumping investigations have been hampered by the lack of records; in Hinkley, and Barstow area groundwater investigations have needed data going back to the 1940's, besides the public has a right to know much beyond 5 years; 25 year retention is more appropriate and the burden with digital and microfiche storage would be minimal;

Sixth, the movement of water potentially at risk SHOULD there be a spill or release below the surface needs to be tracked

Seventh, the state water boards cannot do their jobs without budgets sufficient to hire and retain qualified water hydrologists, geologists, etc--the staffing for at least 2 dedicated such professionals per site should be borne by the discharger and made a part of the licensing cost.

Eighth, there is NO mandatory citizen oversight process required with appropriate

funding to retain professionals to assist the community members involved in the site oversight;

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Ninth, there should be 24-7 digital video monitoring of the site which feeds into a state database for storage and onto a public website for inspection--there should be for public confidence purposes and to have real time data for LEA and or enforcement;

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Again, I regret not having the time to review this more.

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