

ROBERT D. CONAWAY
**FAX COMMENT**

Date: January 21, 2010

To: Harold Singer (760) 241-7308

**Re: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS
FOR NURSERY PRODUCTS HAWES COMPOSTING FACILITY**

Total pages- Two (2)

Dear Mr. Singer:

After not being sent the Tentative [Proposed?]Waste Discharge Requirements and not being given additional time to review it once I received the report, I offer the following items as being in need of clarification/comment:

1. Under "2. Facility" under "4)" only windrows are described as allowed—is the CRWQCB taking away from Nursery Products the right to use static piles or some hybrid between static piles and windrows? If so, good.

2. Under "5. Engineered Alternative to Prescriptive Stds..." I am troubled by the compaction of native soils as a barrier for several reasons:

A. Covering the facility would eliminate any concerns about breakdown of clay and synthetic barriers and provide the dual benefit of capturing and filtering VOC's, spores, airborne mold and or pathogens and could be done with a large and inexpensive Quonset hut type structure over the windrows that is open on the ends for access (used to store large haystacks all over the country) and for when not being accessed by workers, installation of inexpensive biofilters on the ends could be in use—there has not been an economic analysis of a minimal covering—there should be;

B. In moving windrows, equipment will be used to turn them—they are in effect specialized large lifts. Damage to native soils in ^{3/28/10} ~~possible~~ ^{likely} (unless the windrows are not going to be completely turned, in which case the composting operation will present a risk to public health) and since the windrow material will be dropped on top of the damaged compacted soil, there will be no way to inspect it;

despite the cost; the barrier needs to be clay plus liner with a slope to the catch basins;

C. The testing is only annual—in a year with 2,000 wet tons per day allowed, 1.2 billion pounds of wet waste (or some significant fraction thereof) could potentially enter the ground water (300 days of operations x 2,000 wet tons per day or 4,000,000 pounds of discharge per day x 300 days)—testing needs to be much more aggressive (once a month) and the boring needs to slant to points UNDER the compacted pad, as fluids will not always run off—fluids can settle into the passive sand below that which is not compacted (like it naturally does);

D. The argument on cost and science is inconsistent when looking at the Board's impoundment pond comments—where clay is feasible for the impoundment ponds, its should be feasible for the windrows;

3. Green waste, given the history of the applicant, needs to be better defined and there needs to be a load analysis (or source certification) to advise us how much there is in the way of herbicides, pesticides, fertilizer or vectors (insects, rats, etc) in it, which could impact not just the water, plants and animals in the area, but potentially worker and public health from same;

Harold, I wish I had more time. Its too bad that this note might not even be considered.


Robert Conaway