



California Regional Water Quality Control Board  
Lahontan Region



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WDID No. 6B3609 03006

Chris Seney  
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**REVISED PRELIMINARY CLOSURE & POST-CLOSURE MAINTENANCE PLAN,  
NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO  
COUNTY**

On October 17, 2010, the California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received via email your revised Preliminary Closure and Post-Closure Maintenance Plan (PCPCM Plan) for the Nursery Products Hawes Composting Facility (Facility), which was prepared by Nursery Products. A supplemental letter written by Gerry Newcombe, Deputy Administrative Officer/Division Manager, Solid Waste Management Division, County of San Bernardino, to Jeff Meberg (San Bernardino County letter), providing costs for the disposal of finished compost at both the Barstow Sanitary Landfill and Victorville Sanitary Landfill was provided to Water Board staff on October 21, 2010. The objective of the PCPCM Plan is to provide a reasonable estimate of the maximum expected costs that would be incurred to close both the Waste Pile and the two Surface Impoundments at the Facility. Water Board staff has reviewed the PCPCM Plan and determined the report is inadequate. Water Board staff comments are provided below.

**General Comments**

The PCPCM Plan proposes to clean-close the Facility upon termination of operations, in accordance with CCR, title 27, sections 21400 and 21410 requirements. This will be accomplished by decommissioning and removing the structures and restoring the site.

Board Order No. R6V-2010-0010 allows up to 400,000 tons of material to be received at the Facility annually, with production of up to 400,000 cubic yards of finished compost per year. However, the PCPCM Plan proposes that "for the first year of operation there will be a maximum of 25,000 tons of compost onsite at any time," with the volume updated annually based on representative and anticipated conditions at the site for the following year. The San Bernardino County letter indicates a disposal price of \$11.81 per ton of finished compost that may be accepted at both the Barstow and Victorville Sanitary Landfills. This rate is also subject to adjustment annually. However,

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the San Bernardino County letter specifies that the landfills can accept only compost (finished compost product), not in-process material at this price. Therefore, the PCPCM Plan must also account for the disposal of in-process material to an appropriate facility, and the financial assurance amounts must reflect these additional costs. Water Board staff have consulted with the County of San Bernardino, Solid Waste Management Division representatives, who have indicated that disposal of in-process material at the Barstow and Victorville Sanitary Landfills could be accomplished as long as the material is at least 50 percent solid, and at a price (to be updated annually) of \$85 per ton.

As the PCPCM Plan proposes to dispose of 25,000 tons of in-process material, no more than 25,000 total tons of material is allowed at the Facility at any given time, until such time as the total tonnage amount is updated and the amounts specified in the financial assurance instruments have been appropriately increased and have been accepted by the Water Board.

In addition, the PCPCM Plan must include factors for converting tons of compost, both in-process and finished compost, to cubic yards. This is needed as incoming material is specified as cubic yards, yet field measurements will likely be cubic yards as it is impossible to determine the weight of a pile of compost, and disposal costs are based on tons.

### **Additional Comments**

1. The submitted PCPCM Plan, dated October 2010, neglects to include the stamp and signature of a qualified registered professional, in accordance with the requirements of Board Order No. R6V-2010-0010, Section IV.C. Please revise the PCPCM Plan to comply with all the requirements of this Board Order.
2. The pages of the submitted PCPCM Plan are not numbered. Please revise the PCPCM Plan to include page numbers; such page numbers should also be reflected in the Table of Contents.

### **Summary**

Please revise the PCPCM Plan and the financial assurance mechanism to reflect the proper disposal plans/costs for both finished compost product and in-process material to an appropriate disposal facility and in accordance with Water Board staff comments provided herein. As part of this submittal, Nursery Products must provide information to support that a waste qualifies for disposal at specified price quotes. Please submit the revised PCPCM Plan to Water Board staff by **December 22, 2010**.

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](mailto:bbergen@waterboards.ca.gov)) or Patrice Copeland at (760) 241-7404  
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