
Lahontan Regional Water Quality Control Board

July 13, 2012

WDID No.: 6B360903006

Chris Seney
Nursery Products, LLC
PO Box 1439
Helendale, CA 92342

FINAL CONSTRUCTION QUALITY ASSURANCE REPORT, EAST WASTE PILE COMPOSTING PAD AND SURFACE IMPOUNDMENT A AND B, NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO COUNTY

On June 11, 2012, the California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received a Final Construction Quality Assurance Report, East Waste Pile Composting Pad and Surface Impoundment A and B (Report), which was prepared by Zero Energy Institute, LLC., for the Nursery Products Hawes Composting Facility (Facility). The Report was submitted to satisfy Board Order No. R6V-2010-0010 (Board Order), section V.B., which requires Nursery Products to submit a technical report providing details of the construction activities conducted at the Facility, including construction of the waste piles and surface impoundments. Water Board staff reviewed the Report and finds that it fails to adequately describe the installation and construction of this Facility and fails to demonstrate that the Facility was constructed in accordance with accepted design plans, the Board Order, and California Code of Regulations (CCR), title 27.

As-Built Drawings

The hand-drawn as-built drawings provided in the Report do not demonstrate how the Facility was constructed but instead present only how the GCL and HDPE panels were installed in each surface impoundment. Section 2.1.8 of the Report indicates that detailed as-built drawings were performed for the surface impoundments; however, detailed drawings to indicate how the surface impoundments were constructed to include installation of the leak detection monitoring sumps and lysimeters were not provided. Section 3.2 indicates the leak detection and monitoring systems were constructed in accordance with the Geosyntec Consultant design. However, several iterations of the designs were submitted prior to final Water Board approval. Without detailed as-built drawings, Water Board staff are unable to determine if the leak detection and monitoring systems, in addition to the waste pile and surface impoundments, were constructed in accordance with the final Water Board approved design plan. Section 4.2.4.2 indicates that the edge of the liner is a minimum of 4 feet

below ground surface. However, the approved design shows the leak detection monitoring sumps to be directly below the surface impoundment. Without detailed as-built designs, Water Board staff are unable to determine if the leak detection sumps and lysimeters will function properly. Appendix C, *High-Density Polyethylene (HDPE) & Geosynthetic Clay Liner (GCL) Construction Quality Control (CQC) Documentation, Surface Impoundments A and B*, provides copies of hand-drawn field as-built drawings for panel placement of GCL and HDPE for surface impoundments A and B, with one computer-drafted drawing of HDPE installation for surface impoundment B. Appendix E, *East Waste Pile and Surface Impoundments As-Built Survey*, provides what appears to be surveyed elevations for the East Waste Pile, but the figure does not include the surveyed elevations for the surface impoundments, nor is the figure legible.

As submitted, this document does not adequately satisfy the requirements of sections V.B. or V.D. of the Board Order. You must demonstrate that the Facility was constructed in accordance with the final Water Board approved design plan and the Board Order. Please provide such a demonstration with detailed as-built design plans as well as a discussion for any deviations from the approved design plan.

Facility Construction

This Report only addressed the construction of the eastern portion of the Waste Pile and two surface impoundments. Construction specifications were not provided for the western portion of the Waste Pile. In addition, no explanation was given for why the entire facility (including the western portion of the Waste Pile) was not constructed in accordance with the Facility design plan. As the western portion of the Facility was not constructed, it also appears that the drainage structures along the Facility perimeter to the south and west were also not constructed as approved in the design plan. Without the drainage structures in place, the eastern portion of the constructed Facility is vulnerable to inundation from run-on to the Facility. Please provide an explanation as to why the entire Facility was not constructed in accordance with the final approved design plan; in addition, please provide a description of the measures or best management practices (BMPs) that will be installed to prevent inundation from run-on to the Facility until the drainage structures are installed per the approved final design plan.

Quality Assurance

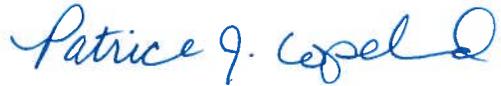
In Appendix B, *Geosynthetic Manufacturer's Quality Assurance GCL and HDPE Liner*, the quality reports from CETCO indicate the Manufacturing Quality Assurance Data Package is for the Dalton Trucking Yard project, not for the Hawes Composting Facility. Please clarify the apparent discrepancy.

Closing

You are reminded that the Final Construction Quality Assurance Report must be accepted by Water Board staff **prior to discharge**. Additionally, the financial assurance mechanisms in an amount adequate to cover the costs of closure and a reasonably

foreseeable release from the Facility must be submitted to and accepted by the Water Board **at least 60 days prior to the discharge of waste** at the Facility. If you have any questions, please contact me at (760) 241-7404 (pcopeland@waterboards.ca.gov) or Brianna Bergen, Engineering Geologist, at (760) 241-7305 (bbergen@waterboards.ca.gov).

Sincerely,



Patrice J. Copeland, P.G.
Senior Engineering Geologist
Chief, S. Basin Land Disposal Unit

cc: Mailing List

BB\rm\Nursery Products\NP-ConstructionReport03Jul12.docx