

## Lahontan Regional Water Quality Control Board

July 13, 2012

WDID No.: 6B360903006

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

### REVISED MONITORING AND REPORTING PLAN & SAMPLING AND ANALYSIS PLAN, NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO COUNTY

On May 7, 2012, the California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received a revised Monitoring and Reporting Plan and Sampling and Analysis Plan (MRP&SAP), which was prepared by Geosyntec for the Nursery Products Hawes Composting Facility (Facility). The revised MRP&SAP, which includes the Background Soils Report, was submitted to satisfy Board Order No. R6V-2010-0010, and was submitted in response to Water Board staff comments provided on January 28, 2011 (enclosed). Water Board staff has reviewed the revised MRP&SAP and has determined the report is incomplete, as it did not include statistical data analysis methods for both groundwater and vadose zone monitoring.

The January 28, 2011 comment letter requested that the statistical data analysis methods be provided for groundwater and the vadose zone in order to compare data that will be collected in the future to baseline information. This revised MRP&SAP included statistical data analysis methods for monitoring the compost pad, but proposed to submit the statistical data analysis methods for the groundwater monitoring and the surface impoundment vadose zone monitoring in the Water Quality Protection Standard Report, which must be submitted no later than 760 days following the beginning of operations. This is proposed in order to evaluate proper statistical methods following eight quarters of data collection.

Water Board staff accept the Background Soils Report and data analysis method only for the **soils component** of the revised MRP&SAP. However, as stated in the January 28, 2011 comment letter, the revised MRP&SAP was accepted contingent upon Nursery Products submitting the proposed statistical methods for groundwater and vadose zone monitoring. Therefore, the revised MRP&SAP is incomplete. As discharge has commenced at the Facility, it is imperative that you submit proposed statistical methods for groundwater and vadose zone monitoring **immediately**.

We look forward to working with you in a manner that protects water quality. If you have any questions, please contact me at (760) 241-7404 ([pcopeland@waterboards.ca.gov](mailto:pcopeland@waterboards.ca.gov)) or Brianna Bergen, Engineering Geologist, at (760) 241-7305 ([bbergen@waterboards.ca.gov](mailto:bbergen@waterboards.ca.gov)).

Sincerely,

A handwritten signature in blue ink that reads "Patrice J. Copeland". The signature is fluid and cursive, with a large, stylized initial "P".

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

Enc.: Water Board comment letter regarding MRP&SAP, January 28, 2011

cc: Mailing List

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# California Regional Water Quality Control Board

## Lahontan Region



Linda S. Adams  
Acting Secretary for  
Environmental Protection

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Edmund G. Brown Jr.  
Governor

January 28, 2011

WDID No: 6B360903006

Chris Seney  
Nursery Products, LLC  
12277 Apple Valley Road, Suite 131  
Apple Valley, CA 92308

### REVISED MONITORING AND REPORTING PLAN AND SAMPLING AND ANALYSIS PLAN, NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO COUNTY

On December 20, 2010, California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received a revised Monitoring and Reporting Plan and Sampling and Analysis Plan (MRP&SAP) which was prepared by Nursery Products. The MRP&SAP was submitted to satisfy Board Order No. R6V-2010-0010, and was submitted in response to Water Board staff comments provided on December 8, 2010, on the MRP&SAP submitted to the Water Board on August 13, 2010. The objective of these plans is to specify procedures for monitoring and reporting as well as procedures for sampling and analyses 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 Nursery Products Hawes Composting Facility (Facility).

After review of this submittal, Water Board staff have determined that the MRP&SAP are missing the statistical data analysis methods that will be needed to compare data that will be collected in the future to baseline information. Specifically, these methods are needed for groundwater monitoring results, surface impoundment vadose zone monitoring results, and compost pad sample results, to determine if there has been a release from the Facility. Additionally, the statistical protocol for selecting annual soil sampling locations was not provided. However, this information may be submitted at a future date along with the baseline information as described later in this letter. Therefore, Water Board staff accepts the report.

Nursery Products must submit its proposed statistical methods for groundwater monitoring and vadose zone monitoring with the report documenting implementation of these monitoring systems pursuant to Section IV.H.1. of Monitoring and Reporting Program R6V-2010-0010, and as proposed in the MRP&SAP, section 4.2, Technical Reports.

*California Environmental Protection Agency*

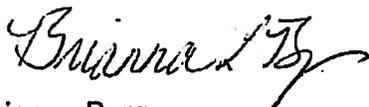


Nursery Products must submit its proposed statistical method for compost pad monitoring along with a separate focused MRP&SAP specifically related to the Native Background Soils Report. These plans must also include specific protocol for annual soil sampling describing the proposed procedures that will be used to determine locations within the Waste Pile from which to sample. *Guidance on Choosing a Sampling Design for Environmental Data Collection*, by U.S. EPA (EPA 1240/R-02/005, December 2002), describes both probability-based and judgment-based sampling design. Because annual soil samples will be collected over a period of years, Water Board staff requests the utilization of a **probability-based** sampling design for the determination of annual sample locations throughout the Waste Pile as relying upon judgment-based sampling design may bias the representativeness of the samples. Please use examples from this guidance document or an equivalent in the development of the protocols for the annual sampling of the Waste Pile.

Following Water Board acceptance of all components listed herein, as well as described in the Water Board staff letter in response to the Background Soils Report, please compile all accepted information into one complete MRP&SAP document and submit this to Water Board staff.

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,



Brianna Bergen  
Engineering Geologist

cc: Mailing List