



December 20, 2010

Harold Singer
Executive Officer
California Regional Water Quality Control Board
14440 Civic Drive, Suite 200
Victorville, CA 92392

Subject: Second Revised Monitoring And Reporting Plan & Sampling and
Analysis Plan and Response to Comments
Nursery Products Hawes Composting Facility

Dear Mr. Singer:

On December 8, 2010 Nursery Products received a letter from the California Regional Water Quality Control Board, Lahontan Region (Water Board) requesting clarification in regard to the Monitoring and Reporting & Sampling and Analysis Plan (MRP&SAP) for the Nursery Products Hawes Composting Facility. The December 8th letter commented upon a MRP&SAP submitted almost four months earlier on August 13th. In addition, the August 13th MRP&SAP responded to an earlier letter from the Water Board and that earlier letter failed to raise any of the issues raised in this letter even though the MRP&SAP was unchanged as to the issues addressed in the December 8th letter. The inconsistency in the Water Board's review has resulted in extensive loss of time and added expenses for comments that have only minimal impact on the environment. Nonetheless, this letter and enclosures addresses comments in the Water Board letter with the expectation that the Water Board will not again raise issues that it determines it has missed in earlier reviews.

The Water Board's December 8, 2010 letter included numerous comments regarding the MRP&SAP. These comments are summarized as follows:

1. COMMENT: The requirements and specifications for reporting are not clear.

RESPONSE: The requirements and specifications for reporting are clearly listed in the reporting section of the MRP&SAP. The MRP&SAP lists quarterly and annual reporting requirements and was copied from the monitoring and reporting program in the Waste Discharge Requirements for the Nursery Products Hawes Composting

Facility. See section 4 of the enclosed second revised MRP&SAP for added clarification.

2. COMMENT: As part of the standard training of operational employees at the site, employees should be trained to look for and know the reporting procedures when they observe operational problems and to document corrective actions.

RESPONSE: Nursery Products employees responsible for monitoring will be properly trained to use monitoring equipment, and will be familiar with the monitoring system, appropriate corrective action and reporting procedures. For further clarification, see section 3 of the enclosed second revised MRP&SAP.

3. COMMENT: Samples must be collected in appropriate laboratory-supplied containers (liquid and sludge samples) or new sample tubes (soil samples) so as to not undermine the integrity of the samples.

RESPONSE: The samples will be collected in pre-cleaned, pre-labeled, properly preserved, laboratory-supplied containers. See sections 3.1 through 3.6 of the enclosed second revised MRP&SAP.

4. COMMENT: If a dedicated or disposable sampling method is not used, a blank sample should be collected after decontamination procedures, but before collecting a sample, to ensure quality control of the samples. Furthermore, when collecting water samples for volatile organic compounds (VOC) analyses, a laboratory-supplied trip blank must accompany the samples to the laboratory and be analyzed for VOCs and reported as part of the quality assurance and quality control procedures.

RESPONSE: If a dedicated or disposable sampling method is not used, a quality control equipment blank (QCEB), will be prepared and collected by the sampling personnel. It will be used to evaluate whether contamination was introduced as a result of improper decontamination of reusable sampling equipment. A QCEB consists of deionized water either poured over or through reusable sampling equipment after decontamination procedures. The QCEB will be collected in and will be shipped along with the samples to the laboratory, and analyzed for the same constituents as the samples. One QCEB will be analyzed for each day that reusable sampling equipment is utilized at the site to facilitate sample collection.

Where samples are collected for analysis of VOCs, a QCTB, provided by the laboratory, will be used to evaluate whether VOC contamination occurred during

sample transport or storage. A trip blank consists of a deionized water sample transported to the field by sampling personnel, shipped along with the groundwater samples to the laboratory, and analyzed for the same VOCs as the groundwater samples. One QCTB will be analyzed with each sample shipment to the laboratory. See Section 3 of the enclosed second revised MRP&SAP.

5. COMMENT: Sampling frequencies, while specified, are not specific.

RESPONSE: Quarterly monitoring events will occur during the first week of the second month of the quarter, and annual monitoring events will occur concurrently with the second quarter sampling event each year. See section 3 of the enclosed second revised MRP&SAP.

6. COMMENT: The monitoring well installation section of the MRP&SAP does not include a description for backfilling the annular seal between the top of the transition seal to the ground surface during monitoring well construction.

RESPONSE: The annular seal will consist of a high-solids bentonite grout (or bentonite chips placed and hydrated in accordance with the above procedure) which will be pumped and placed using a tremie pipe or equivalent to fill the annular space to approximately 5 feet below ground surface. Concrete will be tremied to complete the backfilling of the annular space and be continuous with the minimum 3-foot-diameter surface completion. See section 3.1.1 of the enclosed second revised MRP&SAP.

7. COMMENT: The monitoring well installation section of the MRP&SAP must specify that the California Well Standards for monitoring wells are followed.

RESPONSE: Installation methods and materials will comply with California State Department of Water Resources Well Standards for monitoring wells. See section 3.1.1 of the enclosed second revised MRP&SAP.

8. COMMENT: The monitoring well installation section of the MRP&SAP states that drill cuttings, drilling fluid, and development water will be collected onsite in containers and properly characterized to determine the proper disposal method. However, the MRP&SAP does not specify what characterization methods will be used nor does it specify which disposal methods will be used for each characterization.

RESPONSE: For characterization of soil for disposal, a minimum of one composite soil sample comprised of approximately equal portions of material from each container will be collected and analyzed for Title 22 metals, Total Petroleum Hydrocarbons (TPH), and Volatile Organic Compounds (VOC) by EPA Methods 6010, 8015, and 8260. Additionally, for characterization of liquids for disposal, a minimum of one composite waste water sample comprised of approximately equal portions of liquid from each container will be analyzed for VOCs by EPA Method 8260 and Title 22 Metals by EPA Method 6010. Soil, fluids, and water determined to be impacted will be disposed of at a licensed landfill or water treatment facility appropriate to the characteristics of the material. Materials determined not to be impacted will be discharged to the ground surface. See section 3.1.1 of the enclosed second revised MRP&SAP.

9. COMMENT: Section 3.1.1, Monitoring Well Installation, of the MRP&SAP describes that during well development, "water quality parameters such as pH, turbidity, specific conductance, and temperature will be monitored," and then describes stabilization limits. However, the MRP&SAP fails to specify a time or frequency of repeated readings at which the well would be considered stabilized.

RESPONSE: Groundwater data collection will be performed once every 3 minutes. Monitoring wells will be considered developed when temperature stabilizes to within ± 1 degree Celsius, when pH stabilizes to within ± 0.1 pH unit, and when conductivity stabilizes to within ± 3 percent for three consecutive readings. See section 3.1.1 of the enclosed second revised MRP&SAP.

10. COMMENT: Section 3.1.2, Groundwater Monitoring and Sampling, of the MRP&SAP indicates that the wells will be purged of three borehole volumes, and temperature, pH, and conductivity will be monitored during purging to document the flow has stabilized prior to sampling. However, the MRP&SAP fails to specify a time or frequency of repeated readings at which the well would be considered stabilized. Additionally, the disposal of the purge water for groundwater monitoring efforts was not specified.

RESPONSE: Each well will be purged and sampled using the "purge to stabilization" groundwater sampling technique in general accordance with the Guidance Manual for Groundwater Investigations prepared by the California Environmental Protection Agency (CalEPA), Department of Toxic Substances Control (DTSC), dated July 1995 (revised February 2008). Groundwater data

collection will be performed once every 3 minutes. Monitoring wells will be considered developed when temperature stabilizes to within ± 1 degree Celsius, when pH stabilizes to within ± 0.1 pH unit, and when conductivity stabilizes to within ± 3 percent for three consecutive readings.

Purge water will be containerized onsite pending laboratory analysis. One composite purge water sample comprised of approximately equal portions of water from each container will be analyzed for VOCs by EPA Method 8260 and Title 22 Metals by EPA Method 6010 for disposal characterization purposes. Soil, fluids, and water determined to be impacted will be disposed of at an appropriate licensed landfill or water treatment facility dependent upon the characteristics of the material. Materials determined not to be impacted will be discharged to the ground surface. See section 3.1.2 of the enclosed second revised MRP&SAP.

11. COMMENT: Procedures for determining which locations from the Waste Pile (compost pad) are to be sampled appear to be inconsistent.

RESPONSE: A Nursery Products employee will select 10 random locations to sample from the most frequently used areas of the waste pile. The locations of the sampling will be compiled on a map to assure sampling will not occur in exactly the same location in the future. Each of the 10 samples will come from a different location on the waste pile and no two samples in an annual sampling event should come from the same one- acre area.

12. COMMENT: The MRP&SAP must specify that individual samples of sludge must be collected from each surface impoundment and each sample must be submitted to and analyzed by the laboratory for the appropriate constituents of concern.

RESPONSE: Annually, in the second quarter of each year, individual grab samples of the bottom sludge from each surface impoundment, if present, will be collected, and each sample will be analyzed for the constituents listed in Board Order No. R6V-2010-0010. See section 3.4 of the enclosed second revised MRP&SAP.

13. COMMENT: The MRP&SAP must include instructions regarding the decontamination procedures that site sampling personnel will follow to ensure that the shovel, trowel, or scoop used to collect samples is "clean" prior to its use in sample collection.

RESPONSE: A pre-cleaned shovel, trowel, or scoop will be used to collect a representative sample of the sludge in the bottom of each surface impoundment. Re-usable sampling equipment will be decontaminated using an Alconox wash followed by a potable water rinse, followed by a distilled water final rinse (the 3-bucket wash method). See section 3.4 of the enclosed second revised MRP&SAP.

14. COMMENT: The MRP&SAP must include instructions regarding the decontamination procedures that site sampling personnel will follow to ensure that the "pond sampler" apparatus is "clean" prior to its use in sample collection.

RESPONSE: A pre-cleaned pond sampler (or dipper) that consists of an arm or handle with a clamp to attach a sampling container will be used to collect the representative samples of wastewater. Re-usable sampling equipment will be decontaminated using an alconox wash followed by a potable water rinse, followed by a distilled water final rinse (the 3-bucket wash method). See section 3.5 of the enclosed second revised MRP&SAP.

By this letter and the referenced revisions to the second revised MRP&SAP, Nursery Products has fully responded to every comment by the Water Board regarding the MRP&SAP. Per Lynda Brothers' conversation with you, Nursery Products requests a prompt response from the Water Board approving the MRP&SAP. We expect to begin construction of the Hawes Composting Facility in early February. We would appreciate your response by January 12, 2011 especially given the delays associated with each of the Water Board's prior reviews.

If you have any questions please feel free to call me at 760-272-1224.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris Seney", with a long horizontal flourish extending to the right.

Chris Seney, P.E.

Enclosures: Second Revised MRP&SAP