



California Regional Water Quality Control Board

Lahontan Region



Linda S. Adams
Acting Secretary for
Environmental Protection

Victorville Office
14440 Civic Drive, Suite 200, Victorville, California 92392
(760) 241-6583 • Fax (760) 241-7308
www.waterboards.ca.gov/lahontan

Edmund G. Brown Jr.
Governor

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WDID No. 6B360903006

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

REVISED PRELIMINARY CLOSURE AND POST-CLOSURE MAINTENANCE PLAN, NURSERY PRODUCTS HAWES COMPOSTING FACILITY, SAN BERNARDINO COUNTY

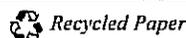
On January 6, 2011, California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received a revised Preliminary Closure and Post-Closure Maintenance Plan (PCPCMP), which was prepared by Nursery Products. The revised PCPCMP was submitted to satisfy Board Order No. R6V-2010-0010, and was submitted in response to Water Board staff comments provided on December 8, 2010, on the PCPCMP previously submitted to the Water Board on October 17, 2010. The objective of this plan is to provide a reasonable estimate of the maximum expected costs that would be incurred to close both the Waste Pile and Surface Impoundments at the Nursery Products Hawes Composting Facility (Facility). Water Board staff has reviewed the revised PCPCMP and accepts the report with the following comments.

Section 5 of the revised PCPCMP indicates that sale of the structures, equipment, and compost remaining on site may be used to off-set the cost of closure of the Facility. While this may be proposed by Nursery Products, it cannot be relied upon. The sale of these items was not noted as relied upon in the Preliminary Closure Cost Estimate.

Section 7.5, Cost Estimate for Financial Assurance, of the revised PCPCMP indicates that no more than 25,000 tons of material will be on site at any time. This on-site material will consist of no more than 20,000 tons of compost and 5,000 tons of in-process material. Because of the difference in disposal costs for these materials, until the financial assurance mechanism is updated, Nursery Products is limited to the tonnage specified in the revised PCPCMP.

Appendix A, Preliminary Closure Cost Estimate, indicates cost for removal of three groundwater monitoring wells. It was noted in the Monitoring and Reporting Plan and Sampling and Analysis Plan (MRP&SAP), Section 3.1, that additional groundwater monitoring wells may be required. Should it be necessary to install additional

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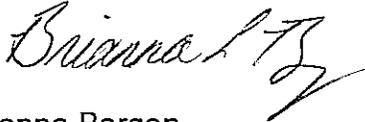


groundwater monitoring wells, this cost estimate and the financial assurance mechanisms will need to be updated accordingly to accurately reflect the site conditions.

Nursery Products must submit the proposed Financial Assurance mechanisms **60 days prior to discharge**, and verify the adequacy of the amounts annually or provide an update based on inflation or a change in site conditions, pursuant to section V.A. of Waste Discharge Requirements, Board Order No. R6V-2010-0010.

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) or Patrice Copeland at (760) 241-7404 (pcopeland@waterboards.ca.gov).

Sincerely,



Brianna Bergen
Engineering Geologist

cc: Mailing List

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