



California Regional Water Quality Control Board
Lahontan Region



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

On August 13, 2010, California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received, the Monitoring and Reporting Plan (MRP) & Sampling and Analysis Plan (SAP), herein defined as the MRP&SAP, which was prepared by Nursery Products. This MRP&SAP was submitted to satisfy Board Order No. R6V-2010-0010, and was submitted in response to Water Board staff comments provided on July 2, 2010, on the MRP&SAP submitted to on May 5, 2010. Water Board staff has reviewed the above referenced report and determined that the report fails to meet the requirements stated in Board Order No. R6V-2010-0010 and was not responsive to the comments in our July 2, 2010 letter. As a result it is unacceptable and will need to be revised further. Water Board staff provide general and specific comments below.

General Comments

The MRP&SAP, like other written plans and procedures, must be sufficiently detailed such that there is no ambiguity as to what is expected regarding sampling, monitoring and reporting. This specificity is needed to insure consistency such that in the event designated Facility personnel are unable to perform their regular duties, qualified backup personnel can complete the required work by following the procedures.

The following are examples where additional details and clarification are required.

1. As submitted, the requirements and specifications for reporting are not clear. The reporting section should describe the components of each report that is to be submitted to the Water Board, such as, but not limited to, the chains of custody, purge logs, analytical data, field data and physical parameters measured and/or observed, charts, graphs, maps, and appropriate discussions and summaries. For example, MRP&SAP Section 3.6, Leak Detection Monitoring Sump (LDMS), indicates that the LDMS will be inspected weekly

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- using a moisture detector. A summary of these observations should also be included in the monitoring reports. Additionally, 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.
2. For samples that require analytical evaluation by a laboratory, the procedures state that the samples will be carefully transferred into pre-labeled, laboratory-supplied containers. **This practice is unacceptable.** The 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. Transferring samples from one container to another can introduce contaminants that may not be related to the media sampled. Please revise the MRP&SAP accordingly.
 3. It is noted that some samples will be collected using disposable equipment such that rinsate or equipment blanks are not required. However, under certain circumstances, such as sampling the Leak Detection Monitoring Sumps, it is noted that pre-cleaned, onsite portable pumping equipment will be used. 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 compound (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.
 4. Sampling frequencies, while specified, are not specific. The specification for quarterly sampling is not sufficient as it could result in samples taken a week apart yet in different quarters. The MRP&SAP must include more specificity on sample collection frequencies (i.e., a sample collected quarterly will be collected during the first week of the second month of the quarter, and annual sampling will occur with the second quarter sampling event).

Specific Comments

Section 3.1.1 - Monitoring Well Installation

5. This section describes the proposed monitoring well installation procedures. However, this section does not include a description for backfilling the annular seal during between the top of the transition seal to the ground surface during monitoring well construction. This description must be included in the MRP&SAP.
6. This section states that installation methods and materials will comply with California State Department of Water Resources Well Standards (California Well

Standards). The California Well Standards includes specifications for multiple types of wells. Please specify that the California Well Standards for **monitoring wells** are followed.

7. This section also 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. Please revise the MRP &SAP to include these details.

Section 3.1.1 – Monitoring Well Development and Pre-sampling Purging

8. 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, i.e., the parameters would remain at those limits for three consecutive readings, with readings being conducted every five minutes.
9. 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, like the example provided in the prior comment, this section should also specify a time limit and frequency of those readings at which stabilization would occur. Additionally, the disposal of the purge water for the groundwater monitoring efforts was not specified.

Section 3.3 Waste Pad Sampling

10. Procedures for determining which locations from the Waste Pile (compost pad) are to be sampled appear to be inconsistent. Section 3.3, Vadose (Unsaturated) Zone Monitoring – Waste Pile (Compost Pad) of the MRP&SAP Addendum indicates that the samples will be randomly selected, and that detailed on a map to prevent "sampling in the same location in the future." However, Section 6.3, Soil Monitoring, of the Report of Waste Discharge, indicates that samples will be collected from the "most frequently used portions" of the composting pad. Please clarify this apparent inconsistency.

Sludge Monitoring

11. 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, as listed in Board Order No. R6V-2010-0010. Composite sludge samples are not permitted.
12. The MRP&SAP must include provide 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.

Wastewater Monitoring

13. 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.

Please revise the MRP&SAP and submit them to Water Board staff at least **60 days** (per the waste discharge requirements) prior to operation of the Facility. 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) or Patrice Copeland at (760) 241-7404 (pcopeland@waterboards.ca.gov).

Sincerely,



Harold J. Singer
Executive Officer
Lahontan Water Board

cc: Mailing List

NP MRP-SAP Addendum Review_pjc-blb 12-8-10

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