



**California Regional Water Quality Control Board  
North Coast Region  
Geoffrey M. Hales, Chairman**



**Linda S. Adams**  
Acting Secretary for  
Environmental Protection

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**Edmund G. Brown Jr.**  
Governor

May 26, 2011

Bob Vogt  
Pacific Gas & Electric  
1000 King Salmon Avenue  
Eureka, CA 95503

Dear Mr. Vogt:

**SUBJECT:** Notice of Violation and Request for Corrective Action, Transmittal of April 13, 2011, Inspection Results, Pacific Gas & Electric, Humboldt Generating Plant, Humboldt County, Demolition of Fossil Units 1 & 2 and Nuclear Unit 3

**FILE:** Construction Storm Water – Pacific Gas & Electric, Eureka, WDID No. 1 12C357418

Your construction site at the PG&E Eureka facility is enrolled for coverage under the Construction Storm Water Program and subject to requirements of the State Water Resources Control Board's General Construction Storm Water Permit Associated with Construction Activities (General Permit). The General Permit requires that owners/operators of enrolled facilities prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) immediately upon commencing construction activity. Objectives of the SWPPP are two-fold: 1) to identify the sources, and control the discharge of pollutants onsite and 2) prepare a monitoring program. Monitoring consists of both visual observations and any required water quality sampling during fall and winter months. Section 1 of the General Permit presents contents of the monitoring program, sample constituents, and monitoring frequency. The SWPPP including the monitoring plan must be retained onsite and is subject to review by our office.

On April 13, 2011, a U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, inspected the facility to assess compliance with the General Permit. On behalf of the participating agencies we appreciate your time and help during the inspection. Attachment A to this letter is a copy of the inspection report for your review. Note that this inspection revealed several deficiencies that need attention:

1. The SWPPP was not consistent with permit requirements; specifically, you have not identified sample collection locations for all drainage areas that represent the quality

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and quantity of storm water discharges from the facility. Details are provided in Attachment A, Item No. 1.

2. Best Management Practices (BMPs) were not adequately implemented to prevent discharges of sediment to storm drain discharge location 004B. Details are provided in Attachment A, Item No. 2.
3. BMPs for storm drain inlet protection were not adequately implemented for the inlets located in Silverado's demolition area of Unit 1. Details are provided in Attachment A, Item No. 3.
4. Onsite personnel were not implementing adequate good housekeeping measures for the waste disposal containers. Details are provided in Attachment A, Item No. 4.

Please be aware that failing to implement the provisions of the SWPPP are violations of the General Permit. If not corrected, these violations may lead to further actions by our office including civil penalties. Please note that the violations, and potential penalties, will continue to accrue until the violations are corrected. Therefore, your timely response in correcting this issue may be a factor in any further enforcement actions taken by our office.

Pursuant to provisions of the General Permit, we request that you modify the SWPPP within 60 days of the date of this letter to address the deficiencies mentioned above and described in the attached report. Please provide a written response to this office describing the modifications that you have made to the SWPPP to address the deficiencies, and including a schedule for implementing new BMPs as necessary.

If you have any questions, please contact Paul Keiran of my staff at (707) 576-2753 or [pkeiran@waterboards.ca.gov](mailto:pkeiran@waterboards.ca.gov).

Sincerely,

David Leland  
Chief, Watershed Protection Division

Attachment A: 2011 Inspection Results

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Cc: Greg Gearheart, Storm Water Program, Division of Water Quality, State Water Resources Control Board. [GGearheart@waterboards.ca.gov](mailto:GGearheart@waterboards.ca.gov)  
Ann Murphy, EPA Clean Water Act Enforcement Officer  
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