

November 10, 2011

MODIFIED NOTICE OF CONSIDERATION OF COVERAGE UNDER
GENERAL ORDER NO. R1-2009-0045, NPDES PERMIT AND WDR
FOR LOW THREAT DISCHARGES TO SURFACE WATERS

City of Eureka
Martin Slough Interceptor Pipeline Project
WDID No. 1B11157RHUM
Humboldt County

On August 11, 2011, the North Coast Regional Water Quality Control Board (Regional Water Board) received a Notice of Intent from AMEC Geomatrix, Inc. on behalf of the City of Eureka requesting enrollment under Order No. R1-2009-0045, General National Pollutant Discharge Elimination System (NPDES) Permit No. CA0024902, Waste Discharge Requirements for Low Threat Discharges to Surface Waters in the North Coast Region (hereinafter Low Threat Discharge Permit) for the Martin Slough Interceptor Project (project). The project will discharge groundwater to waters of the United States (U.S.) and waters of the State, Martin Slough and its tributaries.

In accordance with section II.B.2 of the Low Threat Discharge Permit, a 30-day public notice was posted on the Regional Water Board website from August 26, 2011 through September 25, 2011. No public comments were received. **This modified notice is for the purpose of noticing a proposed reduction in monitoring requirements. Throughout this modified notice, bold type is used to identify changes to the original public notice.**

The project is located within the City of Eureka and surrounding unincorporated neighborhoods that serve the Humboldt Community Services District. The project is located within the Martin Slough drainage basin adjacent to Martin Slough. Martin Slough is tributary to Swain Slough, which discharges to the Elk River and ultimately Humboldt Bay. The purpose of the project is to construct an interceptor pipeline that will transport excess wastewater from the O Street lift station to the Golf Course lift station.

The project will consist of: the installation of approximately 7,800 feet of eighteen to twenty-four inch sewer pipeline, the construction of new manholes, the construction of 2,600 feet of new access roads, and the installation of approximately 600 feet of eight-inch collector piping. Dewatering operations includes groundwater pumping from excavations made during installation trenches and exploratory pits, required for the construction of the new sanitary sewer line. The groundwater will be pumped from the excavations using a submersible pump.

The City of Eureka is seeking coverage under the Low Threat Discharge Permit to dispose of excess groundwater encountered during construction of a new sanitary sewer line. The primary option to dispose of construction dewatering flows is dispersal and infiltration following sediment removal. If infiltration is not an option, the contractor has received permission from the City of Eureka and Humboldt County Services District to use the sanitary sewer for the disposal of construction dewatering flows.

Construction activities to date have produced only minimal amounts of water that have been effectively disposed of to the ground for infiltration or to the sanitary sewer. It is anticipated, however, that the lower reaches of the project will produce greater volumes of groundwater due to greater depth of the trenches in this area coupled with a lack of available sanitary sewer line or infiltration area. When discharge to Martin Slough or its tributaries is necessary, the discharge will be treated for sediment using the dewatering filter bag and then allowed to flow through vegetation prior to flowing over the bank of the stream and into surface water. Once construction activities reach this lower portion of the project site, effluent samples of the potential discharge will be analyzed for compliance with the Low Threat Discharge Permit.

The City of Eureka submitted analytical results characterizing the discharge and the receiving water (Martin Slough) to the Regional Water Board on November 8, 2011 that demonstrate compliance with applicable Water Quality Objectives identified in the Low Threat Discharge Permit, with the exception of settleable solids.

On October 11, 2011 a sample collected from water flowing through the vegetation was 0.30 mL/L/hr for settleable solids. On October 19, 2011 a sample collected from water as it exited the dewatering filter bag was 0.20 mL/L/hr. Effluent limitations specified in the Low Threat Permit for settleable solids is 0.1 mL/L/hr. Thus The City will minimize the discharge of settleable solids by applying a sediment control best management practice (BMP) around the perimeter of the dewatering bag to increase the retention of solids discharged. With the inclusion of this BMP, The City of Eureka is hereby authorized to discharge to Martin Slough in accordance with the Low Threat Discharge Permit and Monitoring and Reporting program (MRP).

The City of Eureka has requested a reduction in effluent and receiving water monitoring requirements for temperature, pH, dissolved oxygen, turbidity, and specific conductance. Provision VII.B of the Low Threat Permit allows the Regional Water Board Executive Officer to modify the MRP for a specific discharger to reduce monitoring frequency and/or eliminate a monitoring parameter if it can be demonstrated that any reduction in monitoring requirements will not compromise water quality. Such reduction in monitoring requirements is allowed under the Low Threat Permit provided that such changes from the standard MRP are identified in the public notice placed on the Regional Water Board's website for the specific applicant. In accordance with the MRP, this monitoring will occur four times a day for the first four days of discharge. Once the analytical data from this monitoring has been received by Regional Water Board staff, it will be reviewed to determine if the data demonstrates compliance with receiving water limitations in section VI.A of the Low Threat Permit. If the data shows compliance, the monitoring frequency will be reduced to once a day for each of the five monitoring parameters identified in this paragraph, at each sampling location (effluent, upstream receiving water, and

downstream receiving water). The Regional Water Board Executive Officer may authorize a further reduction in monitoring frequency to weekly monitoring if monitoring data and project conditions warrant additional reduction. Monitoring frequency would be increased back to daily or 4x/day if site conditions differ from previously monitored conditions.

The City of Eureka has researched alternatives to discharging to surface waters and will discharge a limited volume of water on site for dust control. Depending on the water volumes and space limitations at certain locations along the project, alternate methods may need to be used in place of, or in conjunction with, ground infiltration, sewer system disposal, or surface water disposal. Best management practices (BMPs) that may be used include: storage tanks, sediment desilting basins, and water filters. As a secondary option to the dewatering filter bag, a settling basin may be used. If there are space or distance limitations and/or the quality of the water flowing over the ground and into surface water is not able to meet effluent and receiving water limits, an active filtration system may be used. Additionally, BMPs such as the use of washed gravel, sand bags, straw, and/or silt fences will be used as necessary to control velocity of the discharge and erosion.

Regional Water Board staff is proposing to regulate this project pursuant to section 402 of the Federal Clean Water Act (CWA), implementing regulations adopted by the U.S. Environmental Protection Agency (USEPA), and chapter 5.5, division 7, of the Porter-Cologne Water Quality Control Act (commencing with section 13370). Staff will consider all phone calls and comments submitted in writing and received within a 30-day comment period that begins on the first date of issuance of this letter and ends at 5:00 p.m. on the last day of the comment period. If you have any questions or comments, please contact staff member Cathleen Goodwin at (707) 576-2687 or CGoodwin@waterboards.ca.gov within 30 days of the posting of this notice.

The information contained in this public notice is only a summary of the applicant's proposed activities. The application for the Low Threat Discharge Permit in the Regional Water Board's file contains additional details about the project including maps and design drawings. The related documents and comments received are on file and may be reviewed or copied at the Regional Water Board office, 5550 Skylane Boulevard, Suite A, Santa Rosa, California. Appointments are recommended for document review. Appointments can be made by calling (707) 576-2220.