

June 20, 2012

**Public Notice for Water Quality Certification and/or Waste  
Discharge Requirements (Dredge/Fill Projects)**

Union Pacific Railroad/Former G&R Metals Site Remediation  
WDID No. 1B12094WNHU

Humboldt County

On May 22, 2012, the North Coast Regional Water Quality Control Board (Regional Water Board) received an application from Mr. Joel Strafelda, representing Union Pacific Railroad (Applicant), requesting Federal Clean Water Act, section 401, Water Quality Certification for activities associated with removal of impacted soil and sediment from historical metal salvage operations at the Union Pacific Railroad Waterfront Lease Site (Former G&R Metals), 701 First Street, Eureka. The proposed project will cause disturbances to waters of the United States associated with Humboldt Bay in the Eureka Plain Hydrologic Unit No. 110.00.

The proposed activities are for remedial action of the site to comply with Cleanup and Abatement Order No. R1-2002-0095 issued by the Regional Water Board on October 3, 2002. The proposed remedial action activities are described in the *Union Pacific Railroad Company Waterfront Lease Site, Draft Remedial Action Plan* (RAP). The RAP was approved by Regional Water Board staff on March 22, 2011. The proposed project involves implementation of the approved RAP including demolition of an existing warehouse building, upland excavation, and excavation along the Humboldt Bay shoreline.

The proposed project area consists of a waterfront area and adjacent upland area. The waterfront area includes the offshore tidal mudflat along the Humboldt Bay shoreline. The waterfront area is approximately 1 acre that is separated from the upland area by a steep embankment and a partially vegetated soil berm. The upland area is approximately 3 acres of mostly unpaved land. The upland area includes the soil berm, trees and vegetation at the shoreline, an inactive railroad spur, and a building adjacent to First Street.

The proposed remedial action activities within the waterfront area involve excavating approximately 4,350 cubic yards of contaminated sediment from the tidal mudflat below the high tide line (HTL). Constituents of concern in upland soils and waterfront sediments include select metals, polychlorinated biphenyls, and polycyclic aromatic hydrocarbons. Excavation of smaller isolated areas of contaminated sediment or "hot spots" will also occur adjacent to and under the public boardwalk and pier. Contaminated sediment will be removed to depths of approximately 3 to 5 feet below the sediment surface. Any abandoned, loose, or mud-embedded debris encountered below the HTL will also be removed. Clean soil will be imported and used as backfill to replace excavated materials. A long-armed excavator operated primarily from the shoreline will be used to remove contaminated sediment and backfill excavated areas. The excavator will be placed on crane mats where it needs to be located directly on the mud flat.

Prior to the start of excavation below the HTL, a Portadam structure will be installed along the tidal mudflat area over the course of several tidal cycles to minimize the potential for sediment migration from the work area into Humboldt Bay and to prevent fish from being trapped within the project area. The Portadam structure consists of an impermeable geomembrane liner that is placed over a steel frame support structure. The fully installed structure will create a seal between the excavation work area and the surrounding waters of Humboldt Bay. Any excess water will be pumped to an onsite containment system, treated, and disposed to the City of Eureka sanitary sewer system. Silt fences will be installed in excavation areas where the Portadam structure cannot be used and work will only occur in those areas during low tides.

Eelgrass beds occur adjacent to the waterfront excavation area. The proposed project is not anticipated to directly impact vegetated eelgrass beds. Indirect impacts to eelgrass beds will not be known until excavation activities are complete. The Applicant will implement the *Waterfront Lease Site (Former G & R Metals) Eelgrass Monitoring Plan*. Preconstruction eelgrass surveys will be conducted before starting any excavation activities below the HTL. Post construction surveys will be conducted within 30 days of completion of excavation below the HTL or within 30 days of the beginning of the eelgrass growing season if excavation activities are completed outside of the eelgrass growing season.

Excavated materials will be temporarily stockpiled in an upland area for dewatering. Stabilizing agents may be used to reduce moisture content if dewatering alone does not achieve the required limits for offsite transport and disposal. Waste characterization samples will be collected and waste materials generated from the project will be disposed at appropriate permitted landfills depending on waste characterization as described in the approved RAP. If necessary, decant water from dewatered materials will be treated to reduce solids prior to disposal to the City of Eureka sanitary sewer system.

Proposed excavation activities within waters of the United States will temporarily impact 0.54 acre and 600 linear feet of tidal mudflat along the Humboldt Bay shoreline and 300 square feet of wetlands adjacent to the HTL. Compensatory mitigation is not required for the proposed activities. Clean imported fill placed within waterfront excavation areas will result in a gentler sloping shoreline that is expected to recolonize and increase the area of fringe wetlands adjacent to the HTL. Noncompensatory mitigation includes the use of Best Management Practices (BMPs) for sediment and turbidity control and for operation of heavy equipment in Humboldt Bay.

On November 14, 2011, the Humboldt Bay Harbor, Recreation, and Conservation District approved a Mitigated Negative Declaration (SCH No. 2011102003) for the project in order to comply with CEQA. BMPs to avoid significant adverse impacts to the environment have been incorporated into the project description. The Regional Water Board has considered the environmental document, BMPs, and any proposed changes

incorporated into the project or required as a condition of approval to avoid significant effects to the environment.

The Applicant has applied for authorization from the United States Army Corps of Engineers to perform the project under Nationwide Permit No. 38 (File No. 2008-00212N), pursuant to Clean Water Act section 404. A Lake and/or Streambed Alteration Agreement from the California Department of Fish and Game is not required for this project. Proposed activities are scheduled to begin in August 2012 and are expected to take 2 to 3 months to complete.

The information contained in this public notice is only a summary of the Applicant's proposed activities. The application for Water Quality Certification in the Regional Water Board's file contains additional details about the proposed project activities. The application and Regional Water Board file are available for public review.

Regional Water Board staff are proposing to regulate this project pursuant to Section 401 of the Clean Water Act (33 USC 1341) and/or Porter-Cologne Water Quality Control Act authority. In addition, staff will consider all comments submitted in writing and received at this office by mail during a 21-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, please contact staff member Dean Prat at (707) 576-2801 within 21 days of the posting of this notice.