
North Coast Regional Water Quality Control Board

March 30, 2017

Pacific Gas & Electric
Attn: Alexa La Plante
3401 Crow Canyon Road, Bldg. 414
San Ramon, CA 94583

Dear Ms. La Plante:

Subject: Notice of Applicability of Water Quality Order No. 2003-0003-DWQ for Pacific Gas & Electric Company (PG&E) Construction Dewatering Discharges to Land in the North Coast Region and Approval of Discharge Monitoring and Reporting Program

File: PG&E Excavation Small Volume Construction Dewatering Projects, North Coast Region, WDID No. 1B170262RALL; CIWQS Place No. 412231

This letter serves as Notice of Applicability (NOA) from the North Coast Regional Water Quality Control Board (Regional Water Board) that the General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, Order No. 2003-0003-DWQ (General Order) is applicable to the proposed small volume construction dewatering discharges and that these discharges henceforth are regulated under the General Order as described below. The letter also serves as notification of the Regional Water Board Executive Officer's approval of the proposed Discharge Monitoring and Reporting Program.

Pacific Gas & Electric Company (hereafter "Discharger" or "PG&E") submitted a Notice of Intent (NOI) to comply with the General Order, and a Supplemental Information Attachment (SIA) dated February 24, 2017, for small volume construction dewatering discharges to land in the North Coast Region. This NOA provides authorization for PG&E's dewatering discharges in the North Coast Region, which includes the counties of Del Norte, Humboldt, Mendocino, Trinity, and portions of Sonoma, Glenn, Lake, Marin, Modoc, and Siskiyou. It does not provide authorization for other discharges described in the General Order.

The General Order contains requirements that apply to all low threat discharges and also requirements that apply only to specific types of discharges. The Discharger is responsible for all applicable requirements in the General Order and this NOA.

A copy of the General Order is enclosed with this NOA. The General Order is also available on the Internet at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

Discharge Description

This NOA covers PG&E's discharge of groundwater and storm water from small pits, boreholes and trenches to land located within the North Coast Region. PG&E estimates approximately 20 small volume dewatering projects per month in the North Coast Region.

PG&E dewatering projects are typically associated with the following activities:

- Corrosion assessments: involves excavation under the pipe to investigate findings of potential corrosion or worn pipes.
- Pole replacement: involves excavation up to 5 feet in depth at discrete locations.
- Pipe maintenance or replacement work: involves excavation, pipe removal and replacement.
- Utility Tie-ins: involves excavation to install tie-ins for new service areas.

Dewatering project discharges will typically be 10,000 gallons or less.

Site-Specific Requirements

Employees and contractors of PG&E involved in construction dewatering discharges to land under this authority will be familiar with the requirements contained in the General Order and this NOA.

Land Use Zones and Adjacent Land Use Zones

The majority of dewatering project discharge sites will be in rural or less developed areas where there is enough land adjacent to the site (located at least 100 feet from the nearest surface water) to discharge the water in a manner that does not result in an unauthorized discharge to surface waters, including wetlands, vernal pools, wet meadows, and seeps.

Best Practicable Treatment Control Measures

For each dewatering project, a pre-project evaluation will be conducted (via Geotracker or other sources) to determine whether the project is located within an area with known contaminated soil or groundwater. If there is reason to believe that the excavation water is contaminated, including but not limited to the presence of a visible sheen or odor, samples of the excavation water will be analyzed for constituents of concern to characterize the water quality. If any of the constituents of concern are found to be above Basin Plan water quality objectives, or for any other reason results in a determination that the excavation water is unsuitable for discharge, then the water will

not be discharged to land. Excavation water that is contaminated or otherwise unsuitable for discharge will be disposed of at a legal point of disposal.

For excavation water suitable for land disposal, the excavation water will flow through a filter bag prior to discharge to land. The filter bag has a small nominal pore size (1-3 microns), and therefore will significantly reduce the sediment concentration, as well as the volume of discharge to land. Reduced discharge volumes will minimize the potential for erosion during discharge.

Areas proposed for land discharge of excavation water will be relatively flat, where the potential for runoff is low. Where there is potential for water to runoff to nearby streets or other properties, the discharge area will be protected by straw wattles or through implementation of other appropriate structural best management practices. In no case will a discharge of excavation water to land occur within 100 feet of a surface water body or drainage way that leads directly to a surface water body.

The Regional Water Board will be notified if the volume of excavation water is in excess of 10,000 gallons per day at any project site. The PG&E Construction Dewatering Project Manager will be the primary contact for projects covered under the General Order.

Representative Monitoring and Reporting Program:

Quarterly and semiannual monitoring reports will be submitted to the Regional Water Board in accordance with the monitoring and reporting program for the General Order and the Representative Monitoring and Reporting Program cited in the SIA. The reports will summarize the dewatering projects occurring during the monitoring period. Reported information shall include:

- Dates of dewatering activities
- Project Name
- Discharge Location
- Excavation water source (groundwater/stormwater)
- Approximate volume of discharged water (in gallons)
- Analytical results of samples of excavation water evaluated for discharge suitability

California Environmental Quality Act

A negative declaration in compliance with the California Environmental Quality Act was adopted by the State Water Board with the General Order. The environmental impacts from new discharges authorized by the General Order were found to be less than significant. Mitigation measures were not adopted as a condition of the adoption.

Enforcement

Please review this NOA carefully to ensure that it completely and accurately reflects the discharge. If the discharge violates the terms or conditions listed, the Regional Water Board may take enforcement action, including assessment of administrative civil liability. Prior to any changes to the discharge, or if the method of waste disposal changes from that

described in the NOI and supplemental information, you must contact the Regional Water Board to determine if submittal of a revised NOI is required.

PG&E will generate the waste subject to the terms and conditions of WQO 2003-003-DWQ and will maintain exclusive control over the discharge. As such, PG&E is primarily responsible for compliance with WQO 2003-003-DWQ and this NOA.

Failure to comply with the requirements in the General Order and this NOA could result in an enforcement action as authorized by provisions of the California Water Code. Discharge of wastes other than those described in the NOI is prohibited.

Annual Fees

Staff has determined the discharge is a threat to water quality and complexity rating of 3-C. The annual fee corresponding to a threat to water quality and complexity of 3-C is currently \$2,088. The fee is due and payable on an annual basis until coverage under the General Order is formally rescinded. To rescind coverage, you must provide written notice if the discharge ceases so that we may terminate coverage and avoid unnecessary billing.

Regional Water Board Contact Information

Regulation of the excavation dewatering discharges under the General Order is managed by the Regional Water Board Groundwater Permitting Unit. All monitoring reports must be sent electronically to NorthCoast@waterboards.ca.gov or on disk (CD or DVD) in a Portable Document Format (PDF) file in lieu of paper-sourced documents. The guidelines for electronic submittal of documents can be found on the Regional Water Board website at: <http://www.waterboards.ca.gov/northcoast>.

The case is currently assigned to Regional Water Board staff environmental scientist Rachel Prat. Questions or concerns about this NOA, or related matters should be directed to Rachel Prat at (707) 576-2542 or Rachel.Prat@waterboards.ca.gov.

Sincerely,

Matthias St. John
Executive Officer