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February 20, 2008

Mary Serra, P.E. Chief
Waste Discharge to Land Unit
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive No. 200
Rancho Cordova, CA 95670

Subject: Notice, Tentative Resolution Waiving Waste Discharge Requirements for East Bay Municipal Utility District, Folsom South Canal Connection (FSCC) Project, Dewatering Discharge to Land, Sacramento and San Joaquin Counties

Dear Ms. Serra:

We have reviewed the subject tentative resolution and have the following comments.

1. We have no changes to recommend for monitoring of groundwater to designated discharge areas.
2. We request that monitoring of use of groundwater for dust control and fill moisture conditioning not be required. Reasons are as follows:
 - a. On the FSCC project there is no incentive to apply excessive amounts of water to the roads or to fill. To contain costs, contractors apply as little water as possible.
 - b. We have observed no runoff from dust control operations to date.
 - c. There has been no use of groundwater for fill moisture conditioning to date, and we don't envision that application of groundwater to fill will cause runoff.
 - d. On the FSCC project neither dust control nor fill moisture conditioning will be relied on as a means of disposing of groundwater. At each dewatering area, groundwater will be disposed of either to a surface water under the low threat permit, or to a designated land area under the subject resolution. At sites where groundwater is used for dust control, there will also be a surface water or land area designated for discharge. For example, at Highway 12 and Cord Road, where dewatering wells are used for the highway tunnel crossing, the groundwater is pumped to a nearby field where it is discharged onto the ground. The groundwater is also stored in an elevated tank for use in dust control and fire control. The designated land area is large enough and the soil is sufficiently pervious to accommodate the entire groundwater discharge during periods when no dust control water is being used and during rainy weather.

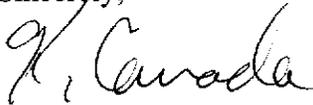
- e. Monitoring of water use for dust control and fill moisture conditioning does not appear to provide a benefit commensurate with the costs.

We recommend the following changes to the section titled "Other Discharge Area Monitoring".

- a. Insert the following paragraph at the beginning of the section: "The Discharger will provide a description of dust control operations and any fill moisture conditioning in the first monthly report. The description will include general location of use of groundwater for dust control and moisture conditioning, typical experience of water application, and any observed instances of over-watering and runoff. Include sample photos if needed to clarify description. In subsequent monthly reports, the Discharger will describe any observed instances of runoff of groundwater from dust control or fill moisture conditioning operations, and any remedial actions."
- b. Insert the following at the beginning of the first paragraph: "If required by the Regional Water Board based on initial report(s) submitted by the Discharger, ..."

If you have any questions regarding the above please contact Phil Kohne at pkohne@ebmud.com or (209) 327-1076. Thank you for the opportunity to comment on this resolution.

Sincerely,



KEVIN CANADA
Construction Manager,
Folsom South Canal Connection Project

KC/dw