# Central Coast Regional Water Quality Control Board 

December 4, 2012

Mr. John Waddell
By email only
Email: jwaddell@co.slo.ca.us
County of San Luis Obispo, Public Works Department
County Government Center, Room 207
San Luis Obispo, CA 93408

Dear Mr. Waddell:

## REGULATORY OVERSIGHT OF DEWATERING ACTIVITIES ASSOCIATED WITH THE LOS OSOS WATER RECYCLING FACILITY PROJECT, LOS OSOS, SAN LUIS OBISPO COUNTY

Installing sewage collection infrastructure, as part of San Luis Obispo County's Los Osos Water Recycling Facility project, involves trenching and dewatering of encountered groundwater. According to the County's March 2012 Dewatering Plan, the County's proposed dewatering approach includes the following four stages:

1. Use the encountered groundwater for construction activities (i.e., dust suppression, compaction, etc.).
2. Discharge the encountered groundwater to the Mid-Town retention site and other existing retention sites.
3. Discharge the encountered groundwater to the Broderson disposal site.
4. Discharge the encountered groundwater to agricultural parcels along Clark Valley Road. This would only be required if groundwater production exceeds the combined disposal capacity of the Mid-Town and Broderson sites.

The Water Board provided the County with coverage under the General Construction Stormwater NPDES Permit (General Permit) on May 21, 2012. The General Permit includes requirements for management practices related to dewatering discharge activities. However, the General Permit only regulates discharges to surface water. As indicated above, the County's primary options of dewatering disposal are to land, which are not regulated by the General Permit.

Our principal concern with discharges to land is the salinity of recovered groundwater. The potential to encounter brackish groundwater or groundwater high in salinity is high in areas near Morro Bay. Discharges of recovered groundwater with TDS concentrations exceeding those of groundwater underlying disposal areas are not acceptable.

The Water Board will regulate the County's discharge of recovered groundwater by coverage under the General Waiver of Waste Discharge Requirements for Specific Types of Discharges, Resolution No. R3-2008-0010 (General Waiver). A copy of the General Waiver may be obtained at the following weblink:
http://www.waterboards.ca.gov/centralcoast/board decisions/adopted orders/2008/2008 0010 gen waiver certain dischargers adopted resolution.pdf

To apply for coverage under the General Waiver, by December 31, 2012, you are required to submit an application (Form 200), which can be found at the following weblink:
http://www.waterboards.ca.gov/centralcoast/publications forms/forms/docs/form 200.pdf
Because the project is already defined in the County's March 2012 Dewatering Plan, additional project description is not required. However, the application must include a description of how the County and its contractors will identify areas of high TDS and appropriately dispose of groundwater removed from those areas. In addition, the application must include a fee of \$1,521.

If you have questions, please feel free to contact David LaCaro at (805) 549-3892 or at dlacaro@waterboards.ca.gov.

Sincerely,


Kenneth A. Harris Jr.
Interim Executive Officer
Cc:
Paavo Ogren, Public Works Director [pogren@co.slo.ca.us]
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