
Central Valley Regional Water Quality Control Board

17 December 2015

Daniel Sanchez, Water Quality Manager
Pacific Gas and Electric Company
3401 Crow Canyon Road
San Ramon, CA 94583

NOTICE OF APPLICABILITY

WATER QUALITY ORDER 2003-0003-DWQ, STATEWIDE WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES TO LAND WITH A LOW THREAT TO WATER QUALITY, PACIFIC GAS AND ELECTRIC COMPANY, DISCHARGES OF WATER FROM UNDERGROUND UTILITY STRUCTURES

Pacific Gas and Electric Company (hereafter “Discharger” or PG&E) submitted a Notice of Intent (NOI) dated 1 September 2015 for the discharge of water from underground utility structures (utility vaults) located within the areal boundary of the Central Valley Regional Water Quality Control Board (Central Valley Water Board). Based on the information presented in the NOI, the discharge of water from utility vaults is consistent with the requirements of the State Water Resources Control Board (State Water Board) *General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality 2003-0003-DWQ* (General Order). This letter provides notice that the General Order is applicable to the discharge as described below.

This Notice of Applicability (NOA) provides authorization for PG&E’s intermittent utility vault dewatering activities region-wide. The discharge is hereby covered under General Order No. 2003-0003-DWQ-0141. Your Waste Discharge Identification Number (WDID) is 5C15NC00206. Please include these numbers on all correspondence related to this discharge.

FACILITY AND DISCHARGE DESCRIPTION

PG&E operates and maintains hundreds of underground utilities within the Central Valley Water Board’s areal boundary. As part of operating the electrical system, regular testing, maintenance, and/or repairs of electrical equipment is required. In some cases groundwater and/or surface water will have infiltrated the utility vault. To allow work to be performed safely, the infiltrated water must be removed. PG&E estimates that approximately 200 utility vaults will be dewatered in the region per year. The amount of water discharged will vary with the size of the utility vault ranging from 5 to 10,000 gallons, with the average size being approximately 500 to 1,000 gallons.

Constituents of Concern in Utility Vault Water

Some utility vaults may contain electrical equipment that could contain polychlorinated biphenyls (PCBs). However, equipment that contains PCBs is sealed and should not leak contaminants into vault water. PG&E reports PCB containing equipment has been systematically replaced and constitutes a small percentage of all of the equipment in use. In most cases PG&E has identified and labeled known PCB-containing equipment remaining in use; however, some vaults are accessed infrequently, are unlabeled, and may be suspect.

To address the potential that constituents of concern might exist in utility vault water, PG&E developed and submitted with the NOI, a Pollution Prevention Plan (PPP) that describes methods to evaluate the utility vault water prior to discharge. Vault water suspected of being contaminated with PCBs, petroleum hydrocarbons, sewage, or other constituents will be removed, containerized, profiled, and disposed of properly.

PG&E has performed sampling and chemical analysis of vault water throughout its service area to characterize vault water quality. The results were submitted with the NOI, and indicate constituents of concern are rarely detected in vault water. The chemical analyses included total petroleum hydrocarbons as gasoline and diesel, benzene, toluene, ethyl benzene, xylenes, and total suspended solids. As an additional measure of safety, any vault water that is discharged is passed through a filter sock¹ which provides physical filtering and granular activated carbon treatment.

The combination of chemical analysis of vault water, evaluation prior to discharge, hauling and proper disposal of suspect utility vault water, and use of a filter sock prior to discharge provides adequate best management practices for water quality protection. The magnitude and concentration of waste constituents that might be discharged constitute a low threat to water quality. Implementation of the PPP is a condition of approval for discharge.

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.

SITE-SPECIFIC REQUIREMENTS

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>. Employees and/or contractors of PG&E discharging vault water to land under this authority must be familiar with the requirements contained in the General Order, this NOA, the PPP, and the Monitoring and Reporting Program (MRP).

¹ Filter sock shall provide a filter medium and activated carbon consistent with the sock described in PG&E's Pollution Prevention Plan (September, 2015).

All vault water discharges to land shall comply with the following:

1. All discharges shall be consistent with the PPP, including evaluation and written documentation of vault water observations.
2. Discharges to land shall only be made with the property owner approval and shall be noted on the Vault Discharge Report form.
3. All discharges shall occur through a filter sock consistent with that described in the PPP, or equivalent.

MONITORING AND REPORTING PROGRAM

PG&E shall comply with the attached monitoring and reporting program, which is attached hereto and made part of this NOA by reference, as well as any changes made by the Executive Officer. The monitoring year shall consist of **May 1 through April 30**.

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to:

centralvalleysacramento@waterboards.ca.gov

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email:

Attention: Compliance/Enforcement Section
Pacific Gas & Electric Vault Maintenance Dewatering Program
Central Valley Regional Water Quality Board
Place ID: 819951

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to the following address:

Central Valley Regional Water Quality Control Board
ECM Mailroom
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670

Please include a transmittal sheet that includes the following:

Attention: Compliance/Enforcement Section
Pacific Gas & Electric Vault Maintenance Dewatering Program
Central Valley Regional Water Quality Board
Place ID: 819951

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 Central Valley Water Board may take enforcement action, including assessment of administrative civil liability. Prior to allowing changes to the discharge, or if the method of waste disposal changes from that described in the NOI, you must contact the Central Valley Water Board to determine if submittal of a revised NOI is required.

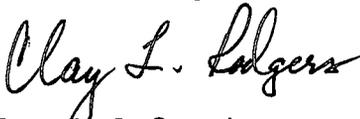
PG&E will generate the waste subject to the terms and conditions of Water Quality Order 2003-0003-DWQ and will maintain exclusive control over the discharge or disposal. As such, PG&E is primarily responsible for compliance with Water Quality Order 2003-0003-DWQ and this NOA.

Failure to comply with the requirements in the General Order, this NOA, or the PPP 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 & CENTRAL VALLEY WATER BOARD CONTACT INFORMATION

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 first annual payment was submitted at part of the NOI application. In future years, 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.

If you have any questions regarding this NOA, please contact Scott Hatton at (559) 444-2502 or at scott.hatton@waterboards.ca.gov for the Fresno office, Scott Armstrong at (916) 464-4616 or at scott.armstrong@waterboards.ca.gov for the Sacramento office, George Low at (530) 224-3208 or at george.low@waterboards.ca.gov for the Redding office.



for Pamela C. Creedon
Executive Officer

Enc: Water Quality Order 2003-0003-DWQ
Monitoring and Reporting Program No. R5-2015-0826

cc w/out enc: Timothy O'Brien, State Water Resources Control Board, Sacramento
Jeremy Laurin, Pacific Gas & Electric
George Low, Central Valley Regional Water Quality Control Board, Redding
Scott Hatton, Central Valley Regional Water Quality Control Board, Fresno
Scott Armstrong, Central Valley Regional Water Quality Control Board,
Sacramento

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM NO. R5-2015-0826
FOR
PACIFIC GAS AND ELECTRIC COMPANY
DISCHARGES OF WATER FROM UNDERGROUND UTILITY STRUCTURES
UNDER
GENERAL WASTE DISCHARGE REQUIREMENTS ORDER 2003-0003-DWQ

This Monitoring and Reporting Program (MRP) describes requirements for monitoring intermittent discharges that occur from utility vaults or other underground structures. This MRP is issued pursuant to Water Code section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) Executive Officer.

California Water Code (CWC) section 13267 states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.”

CWC section 13268 states, in part:

“(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of section 13399.2, or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).

(b)(1) Civil liability may be administratively imposed by a regional board in accordance with article 2.5 (commencing with section 13323) of chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.”

The Discharger controls the discharge that is subject to the Notice of Applicability (NOA) of Water Quality Order 2003-0003-DWQ. The monitoring reports are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and shall submit the monitoring reports described herein.

All samples shall be representative of the volume and nature of the discharge or matrix of wastewater sampled. The name of the sampler, sample type (grab or composite), time, date, location, bottle type, and any preservative used for each sample shall be recorded on the sample chain of custody form. The chain of custody form must also contain all custody information including date, time, and to who samples were relinquished. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Central Valley Water Board staff.

Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that they are used by a State Water Board California Environmental Laboratory Accreditation Program certified laboratory, or:

1. The user is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are maintained and available for at least three years.

VAULT WATER DISCHARGE MONITORING

All vault water shall be characterized consistent with the vault discharge report prepared by Pacific Gas and Electric. A copy of the Vault Discharge Report is attached to this MRP. A Vault Discharge Report shall be completed for each vault that is dewatered. All fields must be completed on each vault discharge report. Copies of the Vault Discharge Reports shall be submitted with the annual report. The Vault Discharge Reports may be submitted in electronic or paper format.

VAULT WATER CHARACTERIZATION

A minimum of five samples of vault water shall be collected each year for chemical characterization prior to discharge. The samples shall be collected from vaults located within the boundaries of the Central Valley Water Board and each sample shall be collected from a separate vault (performing multiple sample events from the same vault is not allowed.) The samples shall be representative of the volume and nature of the discharge. Samples shall be collected from vaults that contain electrical equipment that could contain PCBs to the extent possible. Samples shall be collected after implementation of best management practices (e.g., vault water is discharged through a filter sock²) prior to land discharge. At a minimum, effluent monitoring shall consist of the following:

² Filter sock shall provide a filter medium and activated carbon consistent with the sock described in PG&E's Pollution Prevention Plan (September, 2015).

<u>Parameter</u>	<u>Units</u>	<u>Sample Type</u>	<u>EPA Method</u> ¹	<u>Reporting Frequency</u>
pH	Std. units	Grab	SM4500-HB	Annual
Total Suspended Solids (TSS)	mg/L	Grab	SM2540D	Annual
TPH-diesel	mg/L	Grab	8015M	Annual
TPH-gasoline	mg/L	Grab	8015M	Annual
Oil and Grease	mg/L	Grab	1664A	Annual
Polychlorinated Biphenyls (PCBs) ²	mg/L	Grab	508/608/8082A	Annual

¹ EPA Method specified or equivalent.

² Samples only collected from vaults that have or are suspected of containing PCB equipment in the vault.

REPORTING

All monitoring reports should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to:

centralvalleysacramento@waterboards.ca.gov

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email:

Attention: Compliance/Enforcement Section
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 Rancho Cordova, California 95670

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In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the location, date, sample type, and reported analytical or visual inspection results are readily discernible. The data shall be summarized to clearly illustrate compliance with the General Order and NOA as applicable. The results of any monitoring done more frequently than required at the locations specified in the MRP shall be reported in the next regularly scheduled monitoring report and shall be included in calculations as appropriate.

B. Annual Report

Annual Reports shall be submitted to the Central Valley Water Board by **June 1st following the monitoring year**. The monitoring year shall consist of May 1 through April 30. The Annual Report shall include the following:

1. A completed vault discharge report for each vault in the region that was dewatered during the year. (This includes vaults from which vault water is containerized rather than applied to land.)
2. Tabular summaries of all vault water chemical characterization data collected during the year.
3. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.
4. Laboratory analysis reports do not need to be included in the monitoring reports; however, all laboratory reports must be retained for a minimum of three years. If requested by staff, copies of laboratory analytical report(s) and chain of custody form(s).
5. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.

A letter transmitting the monitoring reports shall accompany each report. The letter shall report violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

“I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.”

The Discharger shall implement the above monitoring program as of the date of this MRP.

Ordered by:

Pamela C. Creedon, Executive Officer

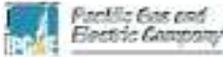
(Date)

Pacific Gas and Electric Company



Proposed DMR Attachment A: Vault Discharge Report form template

Vault Discharge Report (VDR) Form



Note: Only trained personnel may conduct vault discharge activities/spill response/spill cleanup. If needed, contact your local Environmental Field Specialist (EFS) for assistance. After hours, call (800) 874-4043. You must contact EFS to report spills, threatened releases, or discharge of clear water exceeding 10,000 gallons.

Place Discharge Use Tracker sticker here!

Name & LAN ID [person dewatering]: _____ Employee supervisor: _____

Date: _____ Dewatering start time: _____ City: _____ County: _____

Site address or latitude/longitude: _____ Onsite reference (e.g. vault, manhole, or station number): _____

1.) Inspect the integrity of the vault and lid (cracks, leaks):

- Is there damage to vault structure? No Yes
- Is there an Automatic Sump Pump (ASP)? No Yes
- If yes, is ASP leak-free and functioning properly? No Yes N/A

2.) Inspect vault water surface to evaluate oil contamination and potential for PCBs:

- Is there an oil layer? No Yes
 - Is there a **heavy** oil (rainbow) sheen? No Yes
 - Is there a **light** oil (rainbow) sheen and potential for PCBs? No Yes
 - Is there a **light** oil (rainbow) sheen (no PCB potential)? No Yes
- If any these "Yes" boxes are selected, skip Step 3 and proceed to "Red Zone."

3.) Collect a small volume of the vault water and evaluate:

- While wearing protective gloves, collect a small volume of the vault water.
- Wait 5 minutes and record observations below.

Vault Water Characteristic	GREEN Indicator Zone		RED Indicator Zone	
	Light/None		Heavy	
Cloudiness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil Particles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discoloration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chemical odor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sewage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Asphalt tar	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (note below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments/Notes: _____

If ALL boxes checked are in this column, then discharge category is **GREEN**.

If ANY boxes checked in this column, then discharge category is **RED**.

RED ZONE DO NOT DISCHARGE

The vault liquids must be containerized and characterized for disposal.

EFS contacted: _____

Containerized by:

- Vacuum truck
- 50-gallon drums
- Portable tank

Estimated containerized volume (gallons): _____

Note any other actions or anomalies in "Comments"

GREEN ZONE OKAY TO DISCHARGE

- Place Discharge Use Tracker sticker above.
- Discharge vault water through filter sock.
- Monitor discharge and note observations.

Estimated discharge volume (gallons):

- < 100 (small tub)
- 100-1,000 (small pod)
- 1000-5000 (lg pool)
- 5000-10,000 (vac. truck)
- >10,000⁴

Discharged to:

- Storm drain
- Waterway
- Land/natural terrain:
 - PG&E property
 - PG&E easement
 - Not PG&E property or easement, but land owner approval received & noted*

*If discharging to non-PG&E property:
 Land owner name: _____ Signature: _____

¹ If filling out the VDR form digitally, type information from the Discharge Use Tracker sticker in the space provided. When no stickers remain on the filter sock, dispose of the sock properly and use new filter sock.
² Cloudiness does not place vault water in the Red Zone. Note in "Comments" if heavy cloudiness.
³ Equipment that was manufactured before January 1, 1965, or date is unknown, may contain PCBs. If water from a vault containing pre-1965 equipment has an oil sheen, it is not to be discharged.
⁴ For liquid volumes greater than 10,000 gallons, you must note the volume and contact EFS prior to discharging.

Send completed form within 7 days to:
Vault Discharge Program Manager
 3401 Crow Canyon Road
 San Ramon, CA 94583
 or send via email to:
vaultdischarge@pge.com