

Glendening, Susan@Waterboards

From: Glendening, Susan@Waterboards
Sent: Wednesday, July 20, 2016 12:06 PM
To: Tess Byler
Cc: Kevin Murray; Bill Springer (BSpringer@valleywater.org); Saeid Hosseini; Hurley, Bill@Waterboards; Lichten, Keith@Waterboards
Subject: Water Board comments on SF Crk Groundwater Management Plan rec'd 7/12/16

Tess,
I have the following comments on the San Francisquito Creek groundwater management plan, which I received on July 12, 2016:

1. I understand that the plan submitted only covers the work that PG&E will do for the gas pipeline. Please provide a comprehensive groundwater management plan to cover groundwater flows from all construction activities in the Project anticipated to generate groundwater dewatering flows, in addition to PG&E's work.
2. The plan, page 1, states: "Construction dewatering is anticipated for the duration of this project, which may extend until November 15, 2016." Please note that if a work window extension is needed, the Water Board Executive Officer (EO) requires the other agencies to grant an exception before the EO can approve it, in accordance with the 401 certification, Condition 12.
3. Table 1 reports the estimated daily groundwater flow from groundwater dewatering due to micro tunneling and for open trenching. Please revise the plan to add more details with respect to the estimated number of days of groundwater discharges at the various daily flow rates based on the types of activities that will occur in the project. For "micro tunneling bore pit dewatering," the flow rate is 360,000 gallons per day. However, the Micro Tunneling Boring Plan (submitted 7/12/2016) describes dewatering for micro tunneling as being only for the initial stages to excavate the pits, suggesting that groundwater discharges, except incidental seepage, will not be very large once the pits are constructed. Please provide enough details to convey how much groundwater flows will be generated in the Project, based on the range of flow rates from different construction activities, methods, and schedule of activities.
4. The discharge plans states that discharge to the sanitary sewer is proposed for the startup phase, and then discharge to the storm sewer system is proposed "once engineering controls are installed". Why is the initial flow going to be discharged to the sanitary sewer, while after start-up, discharge would be to the stormwater system? The email dialog with City of Palo Alto in Attachment 4 of the plan indicates that you have permission to discharge groundwater flows to Palo Alto's stormwater system. Has the JPA considered discharging at least part of the flow to the golf course? The golf course remodeling project includes a tidal salt marsh restoration element, so may be able to use brackish (or blended brackish) water for irrigation.
5. Pg. 4-5: The filtration system appears to be boilerplate and not customized to the specific discharge for this project. The Water Board requires that the proficiency of the filtration system is certified by a professional engineer to meet the water quality criteria in the 401 certification and Basin Plan water quality objectives. Otherwise, the proposed monthly monitoring schedule presented in Attachment 3 for copper, selenium, nickel, TPH (motor oil), and TSS, is not adequate.
6. The Water Board requires turbidity monitoring at least once per 8 hours on days discharges will occur; "daily" monitoring (as currently stated in the plan) is not the same as once per 8 hours, particularly when construction activities (and groundwater discharges) exceed 8 hours per day. In addition, regarding turbidity monitoring, the proposed plan states that receiving water would not be monitored. The Water Board's turbidity standard for

discharges is based on relative levels between the discharge and receiving water unless the discharge turbidity is < 50 NTU, so unless you plan to filter the water to achieve turbidity levels of <50 NTU, monitoring the receiving water is necessary. The Basin Plan turbidity objective states: "Increases from normal background light penetration or turbidity relatable to waste discharge shall not be greater than 10 percent in areas where natural turbidity is greater than 50 NTU."

7. The monitoring plan contains no information for monitoring of nutrients. Please address this requirement in the revised plan.

Thank you for the opportunity to review the plan. Please let me know if you have any questions about my comments.

Regards,
Susan

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From: tbyler@sfcjpa.org [mailto:tbyler@sfcjpa.org]
Sent: Tuesday, July 12, 2016 1:10 PM
To: Glendening, Susan@Waterboards
Cc: Kevin Murray; Jose Quintero
Subject: [FWD: FW: PG&E Gas Pipeline Relocation Project R-349 Groundwater Dewatering and Management Plan for JPA]

Susan,
I am hereby transmitting PG&E's Groundwater Dewatering plan. It is Appendix C of the Groundwater Management Plan that I will be submitting no later than next week.
I wanted to transmit this so that you

Tess Byler, P.G., C.Hg.
Stormwater Q.S.D./Q.S.P.
San Francisco Creek Joint Powers Authority
(650) 324-1972

----- Original Message -----
Subject: FW: PG&E Gas Pipeline Relocation Project R-349 Groundwater Dewatering and Management Plan for JPA
From: "Quintero, Jose" <JDQ4@pge.com>
Date: Mon, July 11, 2016 1:10 pm
To: "tbyler@sfcjpa.org" <tbyler@sfcjpa.org>
Cc: "Kevin Murray (kmurray@sfcjpa.org)" <kmurray@sfcjpa.org>, "Andrews, Tim" <TXAJ@pge.com>

Tess,

Attached is our Groundwater Dewatering and Management Plan. Please see Tim's comment and questions below. I hope this help push the project forward.

Thank You,

Jose Quintero

Project Manager, Gas Transmission Pipeline Replacement

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From: Andrews, Tim

Sent: Monday, July 11, 2016 1:03 PM

To: Quintero, Jose

Subject: PG&E Gas Pipeline Relocation Project R-349 Groundwater Dewatering and Management Plan for JPA

Jose,

The enclosed Groundwater Dewatering and Management Plan has been developed to satisfy the requirement of the JPA's Clean Water Act Section 401 Certification (April 7, 2015) to support the 2016 PG&E Gas Pipeline Relocation scope of project R-349. Any future modification or addition to this scope will require reconsideration of the measures addressed within.

Because of the complications in access to the northern sample locations, we are submitting this plan without data from the northwestern screening location. As you know, sampling at that location is scheduled to proceed this week with hand tools. Provided these efforts are fruitful, we will be providing the JPA for submittal to the San Francisco Bay Water Board the screening results as well as any modifications to the plan that we deem necessary due to the data.

In other projects with tight review and acceptance windows, we have established a reoccurring meeting with the regulator to review the permit submission and address concerns. If the JPA feels that this will be of benefit to the project and timely acceptance of the plan, I can make our team available for series of calls.

Let me know if you would like to discuss any of the above or attached.

Best,
Tim

Tim Andrews | [PG&E Environmental Management- Transmission](#) | [O 925.328.5174](tel:925.328.5174) | [M 415.693.8212](tel:415.693.8212)