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## Central Coast Regional Water Quality Control Board

May 20, 2013

Mr. John Waddell  
[jwaddell@co.slo.ca.us](mailto:jwaddell@co.slo.ca.us)  
Public Works Department  
County of San Luis Obispo

Transmitted Via Email Only

Dear Mr. Waddell:

**ENROLLMENT IN GENERAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR SPECIFIC TYPES OF DISCHARGES (RESOLUTION NO. R3-2008-0010) FOR THE SAN LUIS OBISPO COUNTY LOS OSOS WATER RECYCLING FACILITY PROJECT AND ASSOCIATED CONSTRUCTION DEWATERING DISCHARGES TO LAND, LOS OSOS, SAN LUIS OBISPO COUNTY**

Central Coast Regional Water Quality Control Board (Water Board) staff reviewed your application submitted on January 25, 2013. The San Luis Obispo County (County) Public Works Department has commenced construction on the collection system as part of the greater Los Osos Water Recycling Facility construction project. In addition, we understand the following information about the project:

### Project Description

1. The project includes the installation of approximately 195,000 linear feet of gravity sewer mains ranging in size from 8 to 18 inches in diameter, 790 manholes, 4,700 sewer laterals, six duplex and two triplex pump stations, 12 pocket pump stations, the Mid-Town Pump Station, and 28,000 linear feet of force main ranging in size from 2 to 12 inches in diameter. Because of trenching and installation activities, the County will need to remove encountered groundwater to install the pipes.
2. The County contracted with three contractors to complete the project. The contractors are each required to submit a detailed dewatering plan, including disposal methods, for approval prior to starting the dewatering operation. While the contractors have not yet started the major dewatering operations and their detailed dewatering plans are not complete, these plans must be compliant with applicable water quality requirements.

### Disposal Method and Location

3. The County's design engineer for the collection system prepared a dewatering plan technical memorandum (Dewatering Plan Memo). The Dewatering Plan Memo

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JEFFREY S. YOUNG, CHAIR | KENNETH A. HARRIS JR., INTERIM EXECUTIVE OFFICER

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includes calculations and estimates of the flows from dewatering activities, which vary by location with the anticipated hydraulic conductivity of the soil. The estimates are applied to sub-areas of the work, with anticipated flows ranging from 120 gallons per minute (gpm) to 1,600 gpm in an individual sub-area (or 2,500 to 4,900 gpm for up to 4 concurrent areas). In addition, the plan identifies six locations within construction zones that could potentially have elevated groundwater and may require pumping.

4. The County proposes to use a four-stage approach for the disposal of encountered groundwater. The first stage is to use water for construction use (dust control, compaction, etc.) since no groundwater retention sites will be available when work starts. Stage two will continue to utilize construction use and will add the new Mid-Town retention site (anticipated capacity of 11,100 gpm or 16 million gallons per day) and the existing retention basin sites located throughout the community for groundwater disposal. During stage three, when the Broderson leachfield site and the recycled water pipeline have been constructed, both the Mid-Town retention site and the Broderson leachfield site (anticipated capacity of 810,000 gallons per day) will be operational and construction of the gravity collection system and pump stations and force mains can then proceed with the necessary dewatering. The intent will be to pump discharged groundwater to the Mid-Town and public retention basins for land disposal and Broderson for back-up.
5. For disposal to drainage facilities, the dewatering specifications require the contractor to use temporary piping or sewer mains to convey the water, remove sediments and silts, and to discontinue discharge to drainage facilities during periods when stormwater runoff is entering the facilities. The contractors must also use the best management practices required in the project stormwater pollution prevention plan (SWPPP) to prevent erosion at or downstream of any discharge location. Discharges to subsurface leach fields will also be less than the designed flow rates for the system.

## Water Quality

6. Sampling and analysis of shallow groundwater at representative sites throughout the work area was completed for the County by Fugro Consultants on February 2, 2012. Samples were analyzed for a range of priority pollutants as well as salinity. All compounds tested were found to be below the State drinking water standards found in Title 22 of the CA Code of Regulations and the majority of the compounds were below detection limits.
7. The contractors are required to manage the dewatering operation so that flows are within the disposal capacity of the method utilized, to meet water quality requirements, and to prevent erosion at the discharge point. For land disposal of water generated by construction dewatering, the primary concern is salinity (or Total Dissolved Solids [TDS]). The Dewatering Plan Memo estimates the radius of the

drawdown cone for a dewatered area as 625 feet. This is the area of influence in which the surrounding groundwater will be drawn into the dewatering wells. The hydrologic conditions in the work area consist of several feet of pressure head of fresh groundwater at the bay front. This condition results in fresh groundwater extending a significant distance under the saline surface waters in Morro Bay and encountering saline water in the construction dewatering operations is therefore considered unlikely.

8. To address salinity, the County proposes to collect and analyze representative weekly TDS samples while dewatering operations are conducted within 1,000 feet of Morro Bay. The County also proposes to submit monthly monitoring reports that summarize TDS concentrations, time, date, location, and estimated volumes of dewatering locations and discharges.

### Existing Permitting

9. Water Board staff sent a letter to the County that discussed specifications related to dewatering activities on May 27, 2011. In short, the letter includes a discussion of dewatering discharges to land with the opportunity to minimize discharges to surface waters. Further, the letter required enrollment into the Construction Stormwater General Permit (General Permit), which requires the development of a SWPPP, the development and implementation of associated best management practices, and a monitoring program.
10. Water Board staff provided coverage to the County under the General Permit on May 21, 2012. The General Permit allows the County to dispose of pumped groundwater to Morro Bay provided that water quality standards are satisfied.

The Water Board has adopted Resolution No. R3-2008-0010, *General Waiver for Specific Types of Discharges* (General Waiver). The proposed collection system pipe installation project, as described in your January 25, 2013 application, is hereby enrolled under the General Waiver. A copy of the General Waiver can be obtained at the following web address:

[http://www.waterboards.ca.gov/centralcoast/board\\_decisions/adopted\\_orders/2008/2008\\_0010.pdf](http://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2008/2008_0010.pdf)

The County's enrollment under the General Waiver is conditional upon County's compliance with the following conditions:

1. The project will be completed as described in the County's January 25, 2013 application for coverage.
2. The County shall submit copies of the detailed construction dewatering plans developed by the individual contractors to the Central Coast Water Board prior to any major dewatering activities.

3. The County shall coordinate with the contractors and develop a phased schedule of construction with the purpose of reducing the daily flow to the discharge locations.
4. Discharges to land shall not cause salinity or TDS concentrations in underlying groundwater to exceed background conditions, as determined by representative water quality sampling at the discharge location.
5. The County shall comply with the prohibitions, recommendations, and specifications identified in Attachment A, Section A of the General Waiver.
6. Significant changes to the discharge volume, location, and/or quality shall be reported in writing to the Executive Officer immediately.
7. Water Board staff shall be allowed to visit the County's construction site to ensure continued compliance with these conditions.

If you have questions, please contact **David LaCaro** at **(805) 549-3892** or at [dlacaro@waterboards.ca.gov](mailto:dlacaro@waterboards.ca.gov) .

Sincerely,



Digitally signed by Kenneth A  
Harris Jr  
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Executive Officer,  
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Kenneth A. Harris Jr.  
Interim Executive Officer

ECM CW-237454

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gen waiver enrollment letter 2013.docx

cc:

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