

From: Gale, Adam (Consultant)
Sent: Tuesday, October 13, 2009 3:41 PM
To: Page, Heather (Consultant)
Subject: Draft Pre-decisional NPDES

Follow Up Flag: Follow up
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Here's the Strategy based off our meeting with Richard.

Thanks,
Adam

Summary from Ecology Meeting (10/8/2009)

Groundwater – Dewatered via wells. Most done from deep and considered clean. Treated to meet state groundwater water quality requirements and reinjected/recirculated. If it comes into contact with construction site it is considered contaminated and needs to fall into the process or wastewater category.

Process or Wastewater – Water generated from concrete batch plant, slurry process plant, dewatering water from spoils, contaminated stormwater, contaminated groundwater, emergency dewatering, etc. If discharging to KC facilities it will need to meet the County's water quality requirements, **BUT**, if the volume exceeds the anticipated permitted volume (75,000 gpd), then where will it go. If the discharge enters waters of the state (Puget Sound) it will likely need to be covered under an Individual NPDES permit.

Permitting Approach

- Look into potential for applying for a General Construction Stormwater NPDES to cover the Ground Removal Replacement (GRR) project, scheduled to commence construction mid-2011. Much less dewatering water/wastewater than what is required for south portal.
- Apply for Individual NPDES to cover remaining portion of the D-B contract, scheduled to commence construction late-2011.
- For the RFP, proceed under the assumption that there's potential for obtaining the general and/or Individual NPDES Permit, and modify in RFP during last December revision period. Utilize conditions from Brightwater and Sound Transit Individual NPDES Permits.

Dewatering/Wastewater Task Force Meeting

- Identify appropriate staff to develop list of all process/wastewater (e.g. dewatered water from spoils, stormwater) and anticipated volumes. The list will also need to demonstrate the ultimate fate and how each item is kept isolated.
- Since many people are waiting on the volumes and other pertinent dewatering info, develop specific list of questions.
- Identify timing of next meeting with Ecology.

Two options for generating dewatering volumes

- Ball park estimate of dewatering/process water and wastewater volumes.
- Wait until mid-November when studies are complete.

Assumptions

- King County will permit 75,000 gpd to be discharged to CSO/stormdrain.
- All groundwater will be dewatered from wells, treated to meet State groundwater standards, and re-injected/re-circulated. If groundwater and process/wastewater are viewed as the same or not permitted to be re-injected/re-circulated, then we will certainly exceed the 75,000 gpd threshold. However, Kevin Fitzpatrick (Ecology) sounded like re-injecting/re-circulating was a viable option.

Other

- Ecology's concern of Jet Grouting or Compensation Grouting (along 1st ave street surface) - residual material and potential for mixing with soil.
- Fire suppression system – volume of water estimates and discharge locations.
- Timing – Individual NPDES Permits take approximately 6-8 months following completed application vs. 45 days for general. Both include a public process with a 30 day comment period and appeal period.
- Difference between Brightwater Conveyance and Sound Transit Conveyance Individual NPDES Permits and the Construction Stormwater General NPDES Permit. Essentially the same, but with the Individual NPDES requiring the following plan submittals: Construction Stormwater/Dewatering Monitoring Plan; Documentation of Soil Stabilization; and Construction Waste Management Plan. The challenge is the review time: 45 days vs. 6-8 months.

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