



December 27, 2013

Ms. Mona Dougherty
North Coast Regional Water Quality Control Board
5550 Skylane Blvd Suite A
Santa Rosa CA 95403-1072
roy.o'connor@waterboards.ca.gov

Re: Comments on Waste Discharge Requirements for the California Department of Transportation Bracut Wastewater Treatment Facility, Humboldt County, Order No. R1-2014-0001

Dear Ms. Dougherty,

On behalf of the board, staff and supporting members of Humboldt Baykeeper these comments are submitted regarding the Draft Waste Discharge Requirements for the California Department of Transportation Bracut Wastewater Treatment Facility located at 6100 Highway 101 North in Eureka, CA.

Humboldt Baykeeper works to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt County through education, scientific research, and enforcement of laws to fight pollution. We submit these comments in addition to our August 8, 2013 comments on the Draft Order.

The site is located immediately adjacent to Humboldt Bay and has the potential to harm coastal waters, estuarine habitats, agricultural wetlands, and other types of habitats considered to be environmentally sensitive under the Coastal Act and the County's Local Coastal Program. Of particular concern is the potential for industrial wastewater discharged through the proposed new facility to contain metals, petroleum hydrocarbons, and other harmful pollutants that could leach into the groundwater and ultimately contaminate nearby coastal waters.

Support for the Order's Prohibition on Discharge of Wash Water from Paint Trucks and Street Sweepers

In the interest of ensuring protection of the biological productivity and quality of adjacent coastal waters, we strongly support the Order's prohibition on discharge of

wash water from paint trucks and street sweepers. This type of equipment should be washed at commercial wash stations that discharge to municipal wastewater treatment systems for treatment before discharge to Humboldt Bay. Such commercial wash stations are available in both Arcata and Eureka, within just a few miles of the Bracut Maintenance Yard.

The rationale for such prohibition is specified on page C-5 of the proposed Order. In short, the WDR for this facility was rescinded due to groundwater contamination associated with effluent from the wash rack.¹ Additional measures such as prohibiting the washing of paint trucks and street sweepers clearly must be taken to avoid re-contaminating the groundwater.

Caltrans must be prohibited from discharging metals-laden industrial wastewater into groundwater that appears to be hydrologically-connected to Humboldt Bay when there are feasible alternatives that would be much more protective of water quality and estuarine habitat.

Impacts to Shellfish

The Bracut Maintenance Yard is just north of the State Native Oyster Reserve, and is upstream from a slough channel that flows right through numerous commercial oyster beds.

Bivalves are not able to successfully regulate metal uptake, and thus tend to suffer from metal accumulation. Shellfish containing high metal levels are unfit for human consumption, and therefore metal-contaminated discharge puts human health at risk as well as commercial oyster production.

The proposed industrial wastewater facility is likely to cause significant negative impacts to Humboldt Bay shellfish and other aquatic species at risk of degradation from metals and other contaminants. Monitoring results from June 6, 2013 indicate that the groundwater has already been impacted by a variety of metals, and further testing should be done to identify potential sources and to examine concentrations of other contaminants of concern.

Impacts to Salmonids

Monitoring results from the Bracut Maintenance Yard monitoring wells sampled in June 2013 indicate elevated levels of various metals including copper, which is

¹ Order No. R1-2003-0099. Recision of Waste Discharge Requirements Order No. 92-27 and Monitoring and Reporting Program Order No. 99-72 for California Department of Transportation Bracut Maintenance Station Wash Rack Wastewater Treatment System. North Coast Regional Water Quality Control Board, Santa Rosa, CA.

harmful to salmonids such as the coho and Chinook salmon and steelhead and cutthroat trout that Humboldt Bay supports.

Chromium is already present in the groundwater at the site in concentrations of 110 to 186 µg/L (June 6, 2013 monitoring results), while the effluent limitations in the Proposed Order set the instantaneous maximum at 0.05 mg/L, (50 µg/L). In March 2013, monitoring results show chromium concentrations of 11 to 14 µg/L, and potential causes of this ten-fold increase in less than three months is unclear. As mentioned above, full characterization of the extent of contamination at this site should be conducted before any further ground disturbance. Such characterization should have been done before the site was developed without the benefit of Coastal Development Permits.

Effluent Limitations Should Include Dioxins and Furans

Table 4 includes pentachlorophenol but omits dioxins and furans, which are longer-lasting constituents that are likely to be present wherever pentachlorophenol was used.

Table 4 - Final Effluent Limitations, Table B-2 – Effluent Monitoring, and Table B-3 – Groundwater Monitoring should include dioxins and furans. Humboldt Bay is listed by the EPA as Impaired for both dioxins and PCBs on the Clean Water Act Section 303(d) list. These two compounds are known to have synergistic and bioaccumulative effects. We can see no justification for including pentachlorophenol in the effluent limitations but omitting dioxins and furans.

Conclusion

We appreciate the opportunity to review and comment on the Draft Waste Discharge Requirements for the California Department of Transportation Bracut Wastewater Treatment Facility. Please keep us informed of opportunities for further review and comment on activities at this site.

Sincerely,

_____/s/_____
Jennifer Kalt, Policy Director

Cc: Melissa Kraemer, California Coastal Commission
Greg Dale, Coast Seafoods

We've Moved!
Or new address is:
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