Message

From: Steve Salzman [salzman@greenwaypartners.net]
Sent: 12/7/2013 12:56:26 AM
To: Smith, DavidW [Smith.DavidW@epa.gov]
CC: Fondahl, Lauren [Fondahl.Lauren@epa.gov]; Fondahl, Lauren [Fondahl.Lauren@epa.gov]; Travis Clohessy [clohessy@greenwaypartners.net]; Bruce Young [byoung@ci.eureka.ca.gov]; bgehrke@ci.eureka.ca.gov
Subject: Eureka Biosolids Project
Attachments: Old Parcel M Outlines.pdf

David,

[redacted] We are delaying our conference call with the RWQCB until your schedule allows.

In speaking with Lauren on Friday I got the impression that there was some confusion about the site we are proposing to use for the land application project. I thought it might be helpful for you to see some aerial photos of Parcel M which is considered to be "waters of the US." I have attached a pdf file that contains two aerial photos from Google Earth. The site is a farmed wetland classified as diked bay lands by the US ACE. It is considered waters of the US because if the dikes were not there the site would be tidally influenced. Like most of the diked bay lands around our bay; the ground surface is below the mean high tide. A tide gate keeps tidal waters from inundating the site and allows rain water to leave the site and discharge to Elk River.

Parcel M has been used as a land application site by the City for over 20 years. A local ranchers hays it then runs cattle on it year round. The program had been covered by the City's NPDES permit since their WWTP was built in 1988. The RWQCB deleted it from the NPDES permit when their General Order governing biosolids application sites came into effect in 2006 (?). We would like to reincorporate it into the upcoming NPDES renewal. We had a round table discussion about a year ago that included the RWQCB, the Coastal Commission, the US ACE, Fish and Wildlife, NOAA Fisheries, and the City. All agreed that the project could be reinstated. The RWQCB told us to submit a Report of Waste Discharge then later determined that they did not have jurisdiction to issue Waste Discharge Requirements. They differed to the EPA to regulate the project under Section 503 and are looking to issue a Joint NPDES permit to cover the treatment plant and the land application program. I would be glad to discuss our proposal with you and answer any questions you may have prior to the conference call. Please don't hesitate to call me. SS (707) 497-8637.

Steve Salzman, P.E.
Principal, Greenway Partners
1385 8th St., Suite 201
Arcata, CA 95521
(707) 822-0597
http://www.greenwaypartners.net/