From:	Ted Weller
To:	PlanningBuilding; CEQAResponses
Cc:	Madrone, Steve
Subject:	Comments on Humboldt Wind FEIR
Date:	Thursday, November 21, 2019 8:06:55 AM
Attachments:	Humboldt Wind Project .pdf

Please see attached document that contains my comments.

Please also acknowledge receipt of them.

Thank you,
Ted Weller

North Coast Regional Water Quality Control Board

November 21, 2019

Mr. Michael Richardson
Director of Scotia Cogeneration Operations
Humboldt Redwood Company
P.O. Box 37
Scotia, CA 95565
MRichardson@hrcllc.com

Dear Mr. Richardson:

The Humboldt Sawmill Company (HSC) is currently regulated by the North Coast Regional Water Quality Control Board (Regional Water Board) under Waste Discharge Requirements, Order No. R1-2012-0065 (2012 Permit). The 2012 Permit also serves as a National Pollutant Discharge Elimination System (NPDES) permit (NPDES No. CA0006017). The 2012 Permit includes Discharge Prohibitions and Reclamation Specifications (Recycled Water). The 2012 Permit is set to be renewed in 2020. Re-use of industrial process water for the uses described in the Humboldt Wind Energy Project EIR documents was not indicated in the in submitted application for renewal of the 2012 Permit receive by Regional Water Board staff.

Regional Water Board staff have reviewed the Final Environmental Impact Report (FEIR) for the Humboldt Wind Energy Project and we have concerns regarding the proposed use of industrial process water from the Scotia Cogeneration Plant, which is part of the HSC facility, for "dust suppression, backfill compaction, and cement mixing."

Section 2.3.16 (Water Supply and Usage) of the Humboldt Wind Energy Project FEIR, Revisions to the Draft Environmental Impact Report (DEIR), states, *"Most of the project's water use would occur during the construction phase for dust suppression, backfill compaction, and cement mixing. These activities are expected to require 62 acre-feet of water over the duration of construction. This water demand would be met by the use of water sourced from the nearby Scotia Community Services District's ~~wastewater treatment and cogeneration facilities~~ and from HRC <u>who would sell the water before</u> it discharges into the "Log Pond" located in the town of Scotia. Potable water required at the O&M building would be provided by a groundwater well."*

Section 3.8 of the DEIR has been revised in the Final EIR to state, *"An estimated 62 acre-feet of water would be required for construction-related activities. Most of this water would be used during construction of wind turbines, transmission lines, the project substation, and related facilities; for dust suppression; for compaction of soil backfill;*

and for manufacture of concrete. Construction-related water demands would be met by water ~~treated wastewater discharged from the Scotia Community Services District's wastewater treatment facility to~~ Humboldt Redwood Company's purchased by HRC from the Scotia potable water supply for use in the HRC cooling towers of the cogeneration plant. HRC discharges this water into the Log Pond. Under an arrangement with HRC, the applicant will collect water before it is discharged into the Log Pond. This water, prior to discharge into the Log Pond, is the property of HRC who has rights to the use of this water and can sell the water for use in the proposed project. (Pers. communication, Dennis Thibeault, Humboldt Redwood Company, L.L.C., June 25, 2019). ~~Treated effluent~~ Water would be delivered to the project site via water truck. The use of water to meet the demands for project construction, therefore, would not constitute a groundwater extraction or a surface water diversion."

Although the 2012 Permit authorizes the use of secondary treated effluent from the Log Pond for use on HRC Sawmill property for dust suppression, there is no authorization for the use of untreated industrial process water for the proposed uses listed in the Humboldt Wind Energy Project (dust suppression, backfill compactions, and cement mixing). The 2012 Permit also includes prohibitions (Discharge Prohibitions III.E, III.I and III.J) that would prohibit the proposed uses listed above.

As a technical matter, the proposed uses of untreated industrial process water raise a number of water quality concerns related to the presence and potential discharge of metals such as chromium, zinc and chlorine. The water quality concerns are related to threats to surface water from potential process water runoff, threats to soil contamination and ground water impacts from the percolation of process water. It also raises regulatory issues as recycled water use requires that the water is first treated to the equivalent of tertiary treatment and must be properly permitted and monitored to evaluate impacts to surface and ground water.

Thank you for your consideration of these comments. If you have any questions, please contact Justin McSmith at 707-576-2082 or at Justin.McSmith@waterboards.ca.gov.

Sincerely,

Justin McSmith

Justin McSmith
Water Resource Control Engineer

191121_JM_er_Humboldt Wind Energy Project Use of Cooling Tower Water

Certified-Return Receipt Requested

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