Statewide Advisory Committee on Cooling Water Intake Structures

Resolution No. 2011-0001

Advising the State Water Resources Control Board on implementation plans submitted by the Los Angeles Department of Water and Power in compliance with the Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

WHEREAS:

1. The Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) was created by the State Water Resources Control Board (State Water Board) to advise the State Water Board on the implementation of the Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters For Power Plant Cooling (Cooling Water Policy) to ensure that the implementation schedule takes into account local area and grid reliability, including permitting restraints.

2. The SACCWIS was charged with reviewing each owner or operator's proposed implementation schedule and reporting to the State Water Board with recommendations.

3. At the State Water Board's December 14, 2010 meeting, Board Members requested that the SACCWIS prioritize review of the Los Angeles Department of Water and Power's (LADWP's) implementation plan.

4. LADWP submitted a compliance plan on April 1, 2011, also requesting amendments to final compliance dates for its facilities set forth in the Cooling Water Policy. LADWP further proposes scheduling of compliance dates for its facilities on a unit-by-unit basis rather than facility-wide.

5. The generator implementation plans submitted on April 1, 2011 identify numerous uncertainties about replacing infrastructure. Although there are generic uncertainties affecting all power plants, the criteria pollutant offset issues in the South Coast Air Basin being addressed by Air Resources Board (in conjunction with other agencies) pursuant to AB 1318 (V. Manuel Perez, 2009) create challenges to replace infrastructure.

THEREFORE BE IT RESOLVED THAT:

1. The SACCWIS finds that the Water Board, rather than obtaining a single compliance plan from generators, should expect to obtain additional information from generators about the timing and method of compliance with the Cooling Water Policy as uncertainties affecting each specific generating unit at a power plant site are reduced or eliminated.

2. The SACCWIS finds that all generator compliance dates should be described on a unit by unit basis rather than on a plant by plant basis.

3. The SACCWIS finds that there is insufficient information to determine whether the implementation dates for LADWP power plants in the current policy are infeasible from a reliability perspective and if the implementation plan submitted by Los Angeles Department of Water and Power satisfies the "...as soon as possible..." requirement contained within Section 2.B(1) of the adopted Cooling Water Policy.

4. The SACCWIS finds that the Los Angeles Department of Water and Power's implementation plan to comply with the State Water Board's Cooling Water Policy does not appear to negatively impact the local area and grid reliability, as compared with the existing compliance schedule in the Cooling Water Policy.

5. The SACCWIS finds that the Los Angeles Department of Water and Power's implementation plan to comply with the State Water Board's Cooling Water Policy does not demonstrate the local area or grid reliability requirements sufficient to justify modifying the current schedules. Therefore the SACCWIS recommends that the State Water Board postpone consideration of any modifications to the compliance schedule until further details are available, and require an updated implementation plan no later than December 31, 2012.

CERTIFICATION

The undersigned does hereby certify that the foregoing is a full, true and correct copy of a resolution adopted at a meeting of the Statewide Advisory Committee on Cooling Water Intake Structures held on July 5, 2011.

Thomas Howard, Chair
Statewide Advisory Committee on Cooling Water Intake Structures