CALIFORNIA
Water Boards

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MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

June 7, 2016

Mr. Stephen O'Kane, Manager
Sustainability and Regulatory Compliance
AES Redondo Beach, LLC
1100 N. Harbor Drive
Redondo Beach, CA 90277

DISCUSSION OF CONCERNS ON THE MAY 26, 2016 RESPONSE TO COMMENTS, AES REDONDO BEACH, LLC, REDONDO BEACH GENERATING STATION, NPDES NO. CA0001201, ORDER NO. R4-2016-XXXX, CI NO. 0536

Dear Mr. O'Kane:

On May 26, 2016, Los Angeles Regional Water Quality Control Board (Regional Water Board) staff released the Response to Comments, Revised Tentative Waste Discharge Requirements, and Revised Tentative Time Schedule Order for AES Redondo Beach LLC (AES), Redondo Beach Generating Station. On June 1, 2016, Regional Water Board staff met with AES staff to discuss AES' concerns with the Response to Comments and the revised tentative requirements. The concerns articulated by AES were the following:

1) Permit effective date: The effective date has been pushed to October 1st; however, as currently written, AES expressed concern that the permit does not clearly define that semi-annual and annual sampling is expected to begin in 2017.

2) Proposed monitoring frequency for Effluent Points 001, 002 and the retention basin: Several alternatives were discussed.

3) Concern about background concentrations in the receiving water for metals, PCBs, DDT, and bacteria that AES states are out of their control and could be detected at the effluent locations, resulting in a violation of permit limits.

4) Inclusion of bacteria in the receiving water: AES states that this is inconsistent with previous permits issued for El Segundo and Scattergood and detections in the receiving water are entirely out of their control. Additionally, AES states that the requirement to monitor bacteria in the receiving water to obtain a geometric mean is onerous since a boat needs to be deployed for each monitoring event (as proposed, weekly sampling is required; however, could increase to daily as a result of exceedances). Lastly, AES states that any detections of bacteria at the two monitoring points arguably cannot be traced to their discharge.

5) Toxicity sampling at RSW-004: RSW-004 is located at the mouth of King Harbor, well away from Discharge Point 002. AES expressed concerns that toxicity in water from this station arguably cannot be traced to their discharge, especially if collected on a flood tide. AES requested that the permit state that it is not liable for TST fails at this station.

6) Requirement to sample PCBs using both method 608 and 1668c: AES states that method 1668c is to gather data to verify assumptions in the TMDL, it is not used for NPDES permit compliance information. AES suggests removal of method 1668c and proposes continued monitoring using method 608.

Regional Water Board staff has considered AES' concerns and will be recommending certain changes to the tentative requirements for the Regional Water Board's consideration. The proposed changes, which are included in the attached change sheet, are summarized below.

1) Table E-10 on Page E-24 of the Monitoring and Reporting Program has been modified to explicitly indicate the start date of the monitoring for each of the specified sampling frequencies.

2) The monitoring frequencies at Effluent Points 001, 002, and the Retention Basin (INT-001A) were modified as per the following footnote:

> "Monthly monitoring is required from October 2016 through October 2017 (one year period). If the discharge is in compliance during the one year period with the prescribed effluent limitations, after requesting and securing approval by the Executive Officer, the monitoring frequency may be decreased to quarterly."

3) Provisions have been included to allow use of intake credits for metals, PCBs, DDT, and bacteria at Outfall 002.

4) Bacteria monitoring in the receiving water has been removed. Instead, bacteria will be measured in the influent and in the effluent, since the influent and effluent at Outfall 002 comes from the same waterbody.

5) Compliance with toxicity limitations will be determined using the data generated at the outfalls. The testing of the receiving water is to assess the toxicity of the receiving water body. Staff is aware that this analysis evaluates the receiving water body whish is accepting discharges from a anumber of Dischargers. This will be taken into consideration when evaluating all toxicity data.

6) The text regarding the monitoring of the PCBs was taken from the Santa Monica Bay DDT and PCBs TMDL. We have modified the text slightly to ensure that it is consistent with the TMDL. The text, which appears on Page F-62 of the Fact Sheet, has been modified to read.

> "Consistent with the Santa Monica Bay Total Maximum Daily Loads for DDT and PCBs (TMDL), this Order also recommends that each Discharger monitor and report PCBs that are present at lower levels than Method 608. The Regional Water Board will use data generated by Method 1668c to verify assumptions and evaluate the need to further refine wasteload allocations in the TMDL..."

If you have any questions, please contact Thomas Siebels at (213) 576-6756 or Cassandra Owens at (213) 576-6750.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer