

Los Angeles Regional Water Quality Control Board

February 24, 2016

Mr. Ken H. Riesz, Sr., Plant Manager
Long Beach Generating Station
Long Beach Generation LLC
2665 Pier S Lane
Long Beach, CA 90802

Dear Mr. Riesz:

AMENDED RESPONSE TO COMMENTS PROVIDING CLARIFICATIONS ON BYPASS MONITORING REQUIREMENTS AND REVISED PAGE E-5 – LONG BEACH GENERATION LLC, LONG BEACH GENERATING STATION (NPDES PERMIT NO. CA0001171, CI-5764)

On February 4, 2016, we transmitted the Response to Comments (RTC) with respect to your comments on the January 12, 2016, tentative permit for the subject facility. Based on our follow-up communications, we have developed this amended RTC to clarify monitoring requirements during the bypass events as indicated in response to comments 4 and 5. The revised tentative permit requires monitoring during all bypass events, when the bypass occurs during the normal operating hours. Monitoring during a bypass event is necessary for the Regional Board to determine whether the bypass discharges have any adverse impacts on the receiving water. Enclosed are the amended RTC and the revised page E-5 that reflects additional changes to the February 4, 2016, mailout. Other revised pages (6, E-8 and E-13) are not enclosed since they remain unchanged from the previous mailout.

In the February 4, 2016 letter, we also informed you that the Board Hearing would be held on March 10, 2016, at 9:00 a.m., at Metropolitan Water District of Southern California, Board Room, 700 North Alameda Street, Los Angeles, California. The venue and time of the Board Hearing remain the same. The Board will hear any testimony pertinent to this revised tentative Order. It is expected that the Board will take action at the hearing; however, as testimony indicates, the Board, at its discretion, may order further investigation.

If you have any questions, please contact Dr. Jau Ren Chen at (213) 576-6656.

Sincerely,



Cassandra D. Owens, Chief
Industrial Permitting Unit

Enclosures

cc: see next page

Mr. Ken H. Riesz, Sr.
Long Beach Generation LLC
Long Beach Generating Station

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February 24, 2016

cc: (via email only)

David Smith, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Becky Mitschele, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Kenneth Wong, U.S Army Corps of Engineers
Bryant Chesney, NOAA, National Marine Fisheries Service
Jeff Phillips, Department of Interior, U.S. Fish and Wildlife Service
William Paznokas, Department of Fish and Wildlife, Region 5
Tim Smith, Los Angeles County, Department of Public Works, Waste Management Division
Bellete Yohannes, City of Los Angeles, Bureau of Sanitation, Industrial Waste Management
Teresa Henry, California Coastal Commission, South Coast Region
Angelo Bellomo, Los Angeles County, Department of Health Services
Rita Kampalath, Heal the Bay
Liz Crosson, Los Angeles Waterkeeper
Becky Hayat, Natural Resources Defense Council
Jason Weiner, Ventura Coastkeeper
George Piantka, NRG Energy, Inc., West Region
Bill Probasco, NRG, Ormond Beach Generating Station
Thomas DiCiulli, NRG, Mandalay Generating Station
Coury McKinlay, AES Alamos, LLC
Katherine Rubin, Los Angeles Department of Water & Power
Scott Seipel, NRG Energy, Inc.
Kristy Allen, Tetra Tech

II. MONITORING LOCATIONS

The Discharger shall establish the following monitoring locations to demonstrate compliance with the effluent limitations, discharge specifications, and other requirements in this Order:

Table E-1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
001	EFF-001	Effluent shall be sampled at a location downstream of any treatment process and upstream of the discharge point into the Back Channel of Long Beach Inner Harbor, where representative samples of the effluent can be obtained.
--	RSW-001	At a location 50 feet from the discharge point.

III. INFLUENT MONITORING REQUIREMENTS – NOT APPLICABLE

IV. EFFLUENT MONITORING REQUIREMENTS

A. Monitoring Location EFF-001

1. The Discharger shall monitor the combined discharge at Monitoring Location EFF-001 as follows. If more than one analytical test method is listed for a given parameter, the Discharger must select from the listed methods and corresponding Minimum Level.

During the first storm water bypass event of the year that occurs within operating hours, monitoring of all priority pollutants and the parameters mentioned below for a bypass event is required.

If an emergency bypass (such as a storm water bypass to avoid facility flooding) occurs, monitoring using grab samples is required for the parameters listed in Table E-2 except total residual chlorine, MBAS, chronic toxicity, TCDD equivalents, remaining priority pollutants and radioactivity. During a prolonged emergency bypass discharges that occurs continuously or intermittently for more than a week, only one sample per week is required. During the first emergency bypass of the year that occurs within operating hours, monitoring of all priority pollutants and parameters mentioned above is required. In each bypass event, the Discharger must collect sufficient bypass sample to provide an adequate amount of effluent sediments (suspended solids) for sediment analyses. If effluent sediment monitoring is triggered by exceedances as described in Footnote 5 of Table E-2, an effluent sediment monitoring on the bypass sediments must be conducted.

During a maintenance bypass event that discharges into the receiving water, monitoring for Table E-2 parameters is required.

Samples for storm water emergency bypass events shall be collected within one (1) hour of:

a. The start of the bypass; or

1-b. The start of facility operation if the bypass occurs within facility non-operating hours and continues to occur during the facility operating hours. Sample collection is required during scheduled facility operating hours. The sampling shall be conducted when sampling conditions are safe.

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