August 24, 2015

Los Angeles Regional Water Quality Control Board
Attn: Mrs. Ching-Yin To
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
losangeles@waterboards.ca.gov, ching-yin.to@waterboards.ca.gov

VIA EMAIL

Re: Follow Up Comments to NRG's August 21, 2015 Letter Responding to Wishtoyo Foundation and its Ventura Coastkeeper Program's August 17, 2015 Comments Regarding Tentative Waste Discharge Requirements (WDRS) and National Pollutant Discharge Elimination System (NPDES) Permit for NRG California South LP, Ormond Beach Generating Station, Oxnard, California (NPDES No. CA0001198, CI No. 5619)

To Whom It May Concern with the Los Angeles Regional Water Quality Control Board:

On behalf of the Wishtoyo Foundation and its Ventura Coastkeeper Program, we have the following comments regarding NRG's August 21, 2015 Letter Responding to Wishtoyo Foundation and its Ventura Coastkeeper Program's August 17, 2015 Comments on Tentative Waste Discharge Requirements (WDRS) and National Pollutant Discharge Elimination System (NPDES) Permit for NRG California South LP, Ormond Beach Generating Station ("Generating Station"), Oxnard, California (NPDES No. CA0001198, CI No. 5619) ("Ormond Generating Station WDRS/NPDES Permit" or "Permit"):

1.) Please ask NRG to conclusively demonstrate that during heavy rainfall events, including but not limited to rainfall events up to 5, 10, 20 and 50 year rainfall events, that there has not been, and will not be, discharges of low volume waste streams, which would include discharges of storm water from the Power Block and or low volume wastes stored in retention basins, in the absence of discharge of Once Through Cooling ("OTC") wastes. Since the timing of OTC waste discharges cannot be timed to coincide with rainfall events, a low volume waste discharge into Discharge Point 001 seems likely during significant rainfall events.

2.) NRG's response to its method of using a hose 4 feet from the bottom of the tunnel discharging OTC flows and low volume wastes to sample at EFF-001 indicates, as Wishtoyo and its Ventura Coastkeeper Program ("Wishtoyo") expressed, that a sample representative of co-mingled/mixed low volume wastes and once through cooling discharges has not, and will continued not to be, obtained through this method of sampling at EFF-001. As described by NRG and Wishtoyo, when the OTC discharges occur, a swift current flows to the ocean. If the low volume waste is discharged to the

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top of this swift current, sampling towards the bottom has not, and will likely not, contain any low volume waste streams. Thus, all previous sample efforts at EFF-001 have not captured the metals and other pollutants in the low volume wastes discharges to Discharge Point 001.

3.) Because the volume of low volume waste stream at EFF-001a (See Diagrams 1 and 2 in Wishtoyo's August 17, 2015 letter) discharged at any one point in time is less than the amounts of OTC discharges if both discharges occur concurrently, how can the Regional Board and the public be assured that if all previous discharges of low volume wastes at EFF-001a occurred concurrently with OTC discharges, that the Generating Station actually took samples while the low volume waste discharge from EFF-001a was occurring? Because of the seemingly much longer duration of OTC waste discharges, it seems likely that the Generating Station could have taken samples after the discharges of low volume wastes from EFF-001a were complete. Please request evidence from the Generating Station that samples at EFF-001 were taken while low volume waste discharges from EFF-001a were occurring.

4.) Because the volume of condensate overboard low volume waste stream discharged at any one point in time is less than the amounts of OTC discharges if both discharges occur concurrently, how can the Regional Board and the public be assured that if all previous discharges of condensate overboard low volume wastes occurred concurrently with OTC discharges, that the Generating Station actually took samples while the condensate overboard low volume waste stream was occurring? Because of the seemingly much longer duration of OTC waste discharges, it seems likely that the Generating Station could have taken samples after the discharges of condensate overboard low volume wastes were complete. Please request evidence from the Generating Station that samples at EFF-001 were taken while condensate overboard low volume waste discharges were occurring.

5.) The Generating Station's low volume waste monitoring results reported to the Regional Board from July 2012 (see attached), and likely many other months when low volume wastes were analyze for metals listed in Table 1 of the 2012 Ocean Plan, indicates that the Generating Station's discharges of low volume wastes exceeded the 2012 Ocean Plan's water quality objectives for copper, zinc, and nickel. If a reasonable potential analysis is performed to determine effluent limits for the Generating Station's discharges, then these low volume waste results should be used to determine reasonable potential and effluent limits. In addition, the Regional Board should analyze the concentration of Metals in condensate overboard low volume wastes and of discharges of all other streams of low volume waste with separate discharge points into the tunnel for Discharge Point 001.

Sincerely,

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Wishtoyo Foundation and its Ventura Coastkeeper Program

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