

**RESPONSE TO COMMENTS ON THE TENTATIVE NPDES PERMIT
NRG California South LP
Ormond Beach Generating Station
NPDES Permit No. CA0001198**

This Table describes all significant comments received from interested parties with regard to the above-mentioned tentative permit. Each comment has a corresponding response and action taken.

Commenter	No.	Comment	Response	Action Taken
Comments received from NRG California South LP on August 18, 2015				
NRG California South, LP	1	NRG California South LP has thoroughly reviewed the Tentative WDRS and NPDES Permit for OBGS and is supportive of Los Angeles Regional Water Quality Control Board staff's analysis and the resulting permit conditions. We recommend approval of this Tentative Permit and the associated Monitoring and Reporting Program.	Thank you for your comment in support of this proposed Order.	None necessary.
Comments received from the Wishtoyo Foundation on August 17, 2015				
Wishtoyo Foundation	1	We object to the Los Angeles Regional Water Quality Control Board's ("Regional Board's") adoption of the 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") unless:	Staff believe that the proposed revised tentative Order includes appropriate provisions and limitations for this Facility to attain and maintain applicable technology-based requirements and numeric and narrative water quality criteria to protect the beneficial uses of the Pacific Ocean (receiving water), as per the requirements of 40 Code of Federal Regulations (C.F.R.) section 122.44. The language incorporated in the Monitoring and Reporting Program (MRP) section of the proposed permit explicitly and effectively locates and specifies all internal and external monitoring locations and sampling requirements that are necessary to ensure accurate compliance assessments of the final combined effluent discharged from the Facility into the Pacific Ocean.	None necessary.

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>1) The Permit is modified with specific provisions detailing the locations and methods of sample collection that guarantee samples are taken from the end of pipe for Monitoring Locations EFF-001a and EFF-001b (See Diagrams 1 & 2) to measure compliance for Discharge Point 001 as required by the Clean Water Act, Permit, and the Monitoring and Reporting Plan (“MRP”) for the Generating Station.</p> <p>2) For samples taken from Monitoring Locations EFF-001a and EFF-001b (See Diagrams 1 & 2), the Permit contains the numeric water quality objectives for metals in Chapter II, Table 1 of the 2012 California Ocean Plan (See Exhibit 3), including those objectives for arsenic, cadmium, copper, lead, nickel, selenium, and zinc, all of which are constituents with effluent limitations in Regional Board Order No. 01-092 (the presently effective WDRS/NPDES Permit) for the Generating Station.</p>	<p>Please refer to subsequent responses to Comments as noted below.</p> <p>The proposed Order specifies discreet sampling locations for the final combined effluent (EFF-001) and each of the low volume waste streams, including the discharge from the retention basins (INT-001A), condensate overboard (INT-001B), and seal water (INT-001C), with associated monitoring requirements and effluent limitations at each of these monitoring locations. Sampling at the locations specified in the permit will result in representative samples of the targeted waste streams. Please refer to Comment 2.</p> <p>Staff disagree. Based on the reasonable potential analysis performed in accordance to the State Water Resources Control Board’s (State Water Board) 2012 Ocean Plan (Ocean Plan) using representative effluent monitoring data, staff prescribed effluent limitations for metal parameters included in Table 1 only if they displayed reasonable potential to cause or contribute to an excursion above the respective water quality standards, or if the parameter has an existing limitation and there is not enough information to determine reasonable potential for that parameter. Utilizing data sets with a minimum of twelve data points, arsenic, cadmium, copper, lead, nickel, selenium, and zinc were determined to have no reasonable potential in the final discharged effluent, and therefore, no effluent limitations were prescribed for these parameters. Please refer to Comment 6.</p>	<p>None necessary.</p> <p>None necessary.</p>

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>3) The Permit's MRP is modified to require that the monitoring requirements for EFF-001a are equivalent to the monitoring requirements for EFF-001 in the tentative permit, except that it shall also be required that total recoverable arsenic, cadmium, copper, lead, nickel, selenium, and zinc are sampled once per month.</p> <p>4) The Permit's MRP is modified to require that the monitoring requirements for EFF-001b are equivalent to the monitoring requirements for EFF-001 in the tentative permit, except that it shall also be required that total recoverable arsenic, cadmium, copper, lead, nickel, selenium, and zinc are sampled once per month.</p>	<p>Staff disagree. Monitoring Location EFF-001 targets a representative sample of the commingled internal waste streams with the once-through cooling water. There is no monitoring location designated as EFF-001A in the proposed Order. Monitoring Location INT-001A targets a representative sample of the low volume waste stream from the retention basins prior to commingling with other waste streams. Pollutant concentrations reported at EFF-001 for arsenic, cadmium, copper, lead, nickel, selenium, and zinc, did not demonstrate reasonable potential. Therefore, they do not have effluent limits and they have semi-annual monitoring requirements in the proposed Order. Please refer to Comments 2 and 5.</p> <p>Staff disagree. There is no reasonable potential for arsenic, cadmium, copper, lead, nickel, selenium, and zinc in the final effluent (once-through cooling water mixed with the low volume wastes from the retention basins, condensate overboard, and the seal water (designated as INT-001A, INT-001B, INT-001C, respectively)). Therefore, semi-annual monitoring requirements are included in the proposed Order. Please refer to Comments 2 and 5.</p>	<p>None necessary.</p> <p>None necessary.</p>
Wishtoyo Foundation	2	Our first of two significant concerns with the Tentative Permit is that as written, it will not ensure samples are taken from the necessary locations that will allow the Regional Board and the public to determine the Generating Station's compliance with the WDRS/NPDES Permit for	Staff disagree. The existing permit (Order No. 01-092), as well as the proposed Order, contain provisions explicit and specific enough such that representative samples of the low volume wastes (before they are commingled with the once-through cooling water waste stream), as well as of the final combined effluent, can be	None necessary.

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>Discharge Point 001, and thus the impact of the Generating Station's discharges to the Pacific Ocean and its marine life. This is because historically, and as would continue if the Tentative Permit were adopted as written, EFF-001 samples have not been taken at the end of pipe for discharges of low volume wastes and discharges of once-through cooling water waste, but instead</p> <p>a.) taken with an extended hose/tube attached to a pump after mixing with, and dilution from, unpolluted ocean water in the tunnel to the Generating Station where rivers of ocean water with swift currents rise and recede with the ebb and flow of the tide, and b.) taken with the hose in a location very close to the bottom of this stream of ocean water where it is likely the contaminants from low volume wastes and once-through cooling waste discharges may often not mix with unpolluted ocean water because of mixing in the upper portion of the ocean water column where the mixed water with wastes is subsequently swept away by ocean currents.</p>	<p>obtained and assessed for compliance purposes.</p> <p>The existing Order required monitoring locations for each of the Facility's effluent streams with associated effluent monitoring requirements and limitations. Section II.A (under the Effluent Monitoring Requirement Section) in the Monitoring and Reporting Program (MRP) of the existing Order stated, "sampling station(s) shall be established for the point of discharge and shall be located where representative samples of that effluent can be obtained." Section IV.C (under the Effluent Monitoring Program for In-Plant Waste Streams section) explicitly defined the parameters as well as monitoring frequencies required for low volume wastes discharges. Furthermore, section I.A.7.b (under the Effluent Limitations for In-Plant Waste Streams section) in the Waste Discharge Requirement (WDRs) of the existing Order enumerated the effluent limitations associated with the low volume waste discharge. The monitoring location and effluent limitations for the low volume wastes as prescribed in the existing Order are separate entities from those prescribed for the final combined effluent from the Facility, which are assessed at Monitoring Location EFF-001, with its own set of monitoring requirements and effluent limitations.</p> <p>The proposed Order explicitly defines discreet sampling locations for the final combined effluent (EFF-001) and each of the low volume waste streams, including the discharge from the retention basins (INT-001A), condensate overboard (INT-001B), and seal water (INT-001C), with associated monitoring requirements and</p>	

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
			<p>effluent limitations at each monitoring location. Table E-1 in the MRP of the proposed Order provides a table of the monitoring locations as well as description for each location. Staff believe the language incorporated in each description is appropriate and specific enough to ensure that sampling be conducted at a location that can provide representative characterization of the quality of each waste stream before it is commingled with another waste stream. The descriptions for the internal Monitoring Locations INT-001A, INT-001B, and INT-001C specifically requires a representative sample be obtained for each individual internal waste stream “prior to commingling with other internal process waste streams or once-through cooling water”. The description for the final combined effluent Monitoring Location EFF-001 specifically requires a location “where a representative sample of the commingled wastewater can be obtained after treatment but prior to discharge to the Pacific Ocean.”</p> <p>Staff noted the commenter’s concern that the current final effluent and low volume waste sampling locations may not provide representative sampling of the final combined effluent and low volume wastes from the Facility due to the configuration of the discharge structure. However, based on the clarifications provided by the Discharger on 8/19/2015 by phone and on 8/21/2015 by letter regarding the configuration of the vault and discharge tunnel, the Facility’s operational practices, and self-monitoring reports submitted under penalty of perjury, staff determined that the monitoring data submitted for the final combined effluent and the</p>	

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
			<p>low volume wastes from the retention basins are valid and representative of these discharges.</p> <p>The discharge structure, as depicted in diagram 1 and 2 in the letter submitted by Wishtoyo Foundation on August 17, 2015, consists of a vault (where the low volume waste from the retention basins is discharged) that is connected to the discharge tunnel (carrying the once-through cooling water flow that leads to the final discharge point in the Pacific Ocean). The Discharger stated that the low volume wastes end of pipe location (sampling location for the low volume wastes) has been designed to maintain a 2 to 3 feet clearance from the ocean water even during high tide; therefore, samples for the low volume waste, as per the Discharger, is collected prior to the low volume wastes mixing with any water that may be present in the vault, and is representative of the low volume wastes discharge.</p> <p>The Discharger stated on 8/19/2015 by phone and in a letter dated 8/21/2015 provided documentation that there has not been discharges of low volume waste absent the discharge of once-through cooling water, a practice that was reflected in the Facility's monthly self-monitoring reports submitted to the Regional Water Board under penalty of perjury. Staff agree that there will be some level of dilution from the ocean water sitting in the vault and the discharge tunnel during the initial moments of discharge. However, the dilution effect as a result of the ocean water in the vault and discharge tunnel will become negligible within seconds, as the ocean water will be carried out of the discharge structure along with</p>	

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
			<p>the combined discharge of once-through cooling water and low volume wastes to the Pacific Ocean in a very short amount of time. The Discharger stated that it is their practice to sample at least 30 minutes after the initial startup of a circulator pump unit (beginning of discharge) for every discharge event. Therefore, the dilution effect created by the ocean water residing in the discharge structure at the time of sampling should not be large enough to cause any significant deviation of the true concentration of the combined effluent at Monitoring Location EFF-001. Additionally, given the amount of flow coming out of the pipe at Discharge Point 001, staff determined that it is highly unlikely, if not impossible, that there can be a continual influx of ocean water into the discharge tunnel during discharge. The turbulence in the discharge structure created by the flow of the once-through cooling water (a minimum of 119,000 gallons/min when the low volume waste stream from the retention basins is discharged) should provide enough mixing to the content in the discharge structure such that a representative sample of the final combined effluent can be obtained at EFF-001. Therefore, monitoring data from samples obtained at EFF-001 are representative samples of the final effluent from the Facility, rendering the reasonable potential analysis and the resulting effluent limitations valid.</p>	

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
Wishtoyo Foundation	3	Furthermore, under the Tentative Permit and currently effective permit, samples of low volume waste are not taken at EFF-001a as displayed in Diagrams 1 and 2 when discharges of low volume waste occur in isolation of discharges of once-through cooling waste at EFF-001b.	<p>Staff disagree. The existing Order, as well as the proposed Order, has provisions specific enough to ensure the discreet sampling of low volume wastes and the final combined effluent. Please refer to response to Comment 2. Furthermore, the Discharger confirmed with Regional Water Board staff on 8/19/2015 by phone and by letter on 8/21/2015 provided documentation to support their statement that no discharge of low volume waste has occurred without the discharge of once-through cooling water waste. Staff has not received any evidence to determine otherwise.</p> <p>Discharges of low volume wastes absent the discharge of once-through cooling water will result in a totally different effluent and the conditions modelled do not account for this scenario. Hence, staff will include a prohibition in the permit to ensure that low volume wastes is not discharged absent the discharge of once-through cooling water. Please refer to response to Comment 9.</p>	Prohibition has been included in section III in the Limitations and Discharge Requirements of the proposed Order to ensure that the discharge of low volume waste does not occur absent the once-through cooling water discharge.
Wishtoyo Foundation	4	The Tentative Permit thus must ensure samples of discharges from the Generating Station are taken before, and not after, the Generating Station's discharges come into contact and or mix with ocean water in the sub-surface tunnel from the Generating Station to the Ocean that contains a continual stream of ocean flows that rise and recede with the ebb and flow of the tide.	As explained in detail in staff's response to Comment 2, the proposed Order provides language specific enough to ensure the discreet and representative sampling of low volume wastes and the final combined effluent discharged from the Facility. Furthermore, as explained in response to Comment 2, the dilution from the ocean water that resides in the discharge structure during times of no discharge only affects the discharge quality during the initial moments of discharge, and due to the turbulence created by the large volume of once-through	None necessary.

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
			cooling water discharge (in the magnitude of millions gallons per day), this dilution factor will become negligible in seconds. Since the Discharger does not conduct any monitoring within seconds of beginning the discharge, staff determines that the volume of ocean water residing in the discharge structure during no discharge does not result in any additional dilution or misrepresentation of the true effluent quality of the final combined effluent discharged from the Facility.	
Wishtoyo Foundation	5	<p>The MRP must thus contain specific QA/QC that ensures proper field sampling protocols are implemented that provides for</p> <p>a.) a sample that is representative of the highest concentrations of metals and other pollutants in low volume wastes discharged at EFF-001a, and</p> <p>b.) a separate sample that is representative of the highest concentrations of metals and other pollutants in once-through cooling waste discharges at EFF-001b.</p>	<p>The MRP as proposed is appropriate for the following reasons:</p> <p>The low volume waste from the retention basins is treated and left stagnant for a period of time before being discharged from the Facility. The quality of the effluent from the retention basins is measured at Monitoring Location INT-001A. The majority of the final combined effluent is composed of once-through cooling water. Once-through cooling water is non-contact cooling water and historically has not yielded high concentrations for metals, as shown by the monitoring data at Monitoring Station EFF-001 (taken after the once-through cooling water is commingled with low volume wastes) during the term of the existing Order. Furthermore, the once-through cooling water is withdrawn from the ocean for cooling purposes only, and does not undergo any processes where significant amounts of metals or other pollutants will be introduced.</p> <p>The proposed Order prescribes discreet monitoring requirements and effluent limitations for the individual</p>	Revision was made to Table E-2 in the MRP.

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
			<p>low volume waste streams and the final combined effluent. For the final combined effluent (at Monitoring Location EFF-001) and individually for the discharge from the retention basins (INT-001A), condensate overboard (INT-001B), and seal water (INT-001C), monitoring frequencies of at least once a month are required for parameters with effluent limitations; monitoring frequencies of twice per year are required for all other Ocean Plan Table 1 pollutants that did not display reasonable potential. Therefore, staff determined that the MRP as proposed presents a monitoring program such that the quality of each type of discharge can be adequately assessed for compliance with the provisions of the proposed Order and the Ocean Plan, and the contribution of pollutants from the individual internal waste stream to the final combined effluent can be assessed in the future.</p> <p>Staff noted the commenter's concern that if the final combined effluent samples are not always taken during the discharge of low volume wastes, then the highest concentrations of pollutant may not be captured. Staff addressed this concern with an additional footnote to Table E-2 of the monitoring requirements for Monitoring Location EFF-001:</p> <p><u>¹⁵ If a discharge of low volume wastes from the retention basins (to be monitored in Monitoring Location INT-001A) occurs during a discharge event, then the Discharger must sample for the final combined effluent at Monitoring Location EFF-001 during the duration of such discharge, and state so under penalty of perjury in</u></p>	

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
			<u>the corresponding monitoring report.</u>	
Wishtoyo Foundation	6	<p>The WDRS/NPDES Permit must include effluent limits for arsenic, cadmium, copper, lead, nickel, selenium, and zinc that mirror the water quality objectives in Table 1 of the 2012 California Ocean Plan (See Exhibit 3) at Monitoring Locations EFF-001a and EFF-001b (See Diagrams 1 & 2), because:</p> <p>1) The Regional Board has no basis to exclude these contaminants using a reasonable potential analysis because the samples the Regional Board used to conduct its reasonable potential analysis for the Tentative Permit have never been taken from Monitoring Location EFF-001 in a manner that would provide the Regional Board with accurate or reliable data from which to conduct a reasonable potential analysis or in the manner required by the Clean Water Act and the Permit. This is because EFF-001 samples were not taken at the end of pipe for discharges of low volume wastes and once-through cooling water waste, but instead were taken with an extended hose/tube attached to a pump a.) in a location after mixing with, and dilution from, unpolluted ocean water in the tunnel to the Generating Station where rivers of ocean water with swift currents</p>	<p>The effluent limitations as included in the proposed Order are appropriate for reasons as follows:</p> <p>The effluent limitations for 2012 California Ocean Plan (Ocean Plan) Table 1 parameters were developed following the procedures outlined in the Ocean Plan. Reasonable potentials analyses (RPA) were performed for all Ocean Plan Table 1 water quality criteria following the steps outlined in Appendix VI of the Ocean Plan and using the RPcalc program developed by the State Water Resources Control Board (State Water Board), based on representative data as reported by the Discharger under penalty of perjury. For parameters that displayed reasonable potential (RP) to cause or contribute to an exceedance of the water quality standards as set forth in the Ocean Plan or parameters that have existing limitations and not enough information was provided to assess their reasonable potential, effluent limitations were developed and prescribed in accordance with the instructions in section III.C of the Ocean Plan. Detailed explanation of the effluent limitation development process can be found in section IV of the Fact Sheet in the proposed Order.</p> <p>Arsenic, cadmium, copper, lead, nickel, selenium, and zinc did not display RP in the RPA. Therefore, staff determined that it is appropriate to not include effluent limitations for these parameters in the proposed permit.</p>	None necessary.

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>rise and recede with the ebb and flow of the tide, and b.) in a location very close to the bottom of this stream of ocean water where it is likely the contaminants from low volume wastes and or once-through cooling waste discharges never mixed with unpolluted ocean water because of mixing of waste streams and ocean water in the upper portion of the ocean water column that were subsequently swept away before reaching depths where samples representative of the waste streams could be collected through the hose. Furthermore, as displayed in Diagrams 1 and 2, samples of low volume waste were not taken at EFF-001a when discharges of low volume waste occurred in isolation of discharges of once-through cooling waste at EFF-001b.</p> <p>2) The Regional Board has no basis to exclude these contaminants using a reasonable potential analysis because the samples the Regional Board used to conduct its reasonable potential analysis for the Tentative Permit have never been taken from Monitoring Location EFF-001 in the manner required by Regional Board Order No. 01-092 because contrary to the General Monitoring Provisions and Table E-1 in Permit Attachment E, the Generating Station did not locate effluent sampling locations where representative</p>	<p>However, the proposed Order has requirements for the Discharger to monitor these parameters twice a year, individually at the final combined effluent (Monitoring Location EFF-001) and at each low volume waste streams (Monitoring Locations INT-001A, INT-001B, INT-001C), for future RPA.</p> <p>Staff noted the concern from the commenter that if the monitoring data were based on samples that are not representative of the discharge, then the reasonable potential analysis and the effluent limitations contained in the proposed Order are not valid. However, as explained in staff's response to Comment 2, after discussion with the Discharger to clarify the configuration of the discharge structure, staff determined that the monitoring data used to conduct the RPA are valid and representative of the final combined effluent discharge from the Facility. Therefore, the RPA and the resulting effluent limitations as included in the proposed Order are appropriate. Please refer to response to Comment 2.</p>	

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>samples of that effluent stream can be obtained and did not locate EFF-001 at a location where a representative sample of the commingled wastewater can be obtained after treatment but prior to discharge to the Pacific Ocean.</p> <p>3) These metals are contaminants of concern in the Generating Station's low volume waste and stormwater discharges from Locations EFF-001a and or EFF-001b (See Diagrams 1 & 2), which at certain times of the year, can discharge in high quantities and in the absence of once-through cooling water waste discharges.</p>	<p>Staff also noted the concern that the discharge of low volume wastes without the discharge of once-through cooling water may cause discharges with elevated pollutant levels that can potentially cause violations of the effluent limits and adversely affect the beneficial uses of the receiving water. Staff addressed this concern by incorporating an additional prohibition in section III in the Limitations and Discharge Requirements of the Proposed Order. Please refer to response to Comment 9.</p>	<p>Prohibition included in section III in the Limitations and Discharge Requirements of the proposed Order.</p>
Wishtoyo Foundation	7	<p>In-plant waste stream data reported to Wishtoyo and its Ventura Coastkeeper Program for stormwater discharges (see Exhibit 2: GenOn Consent Decree Action Plans and Stormwater Discharge Data submitted to Wishtoyo and its Ventura Coastkeeper Program), indicates that presence of high and toxic levels of arsenic, cadmium, copper, lead, nickel, selenium, and zinc in the Generating Station's low volume waste stream that exceed the 2012 California Ocean Plan's water quality objectives (See Exhibit 2 data documenting Generating Station sampled and</p>	<p>Staff reviewed the data presented by the commenter regarding the quality of storm water from the Facility, as well as the quality of the effluent from the retention basins based on the monitoring data submitted by the Discharger during the term of the existing Order. The Facility begun discharging waste from its reverse osmosis (RO) unit and storm water to the retention basins in 1992 and 2013, respectively. Therefore, the monitoring data reported by the Discharger for the low volume wastes in its monthly self-monitoring reports submitted to the Regional Water Board in the past are representative. The last numerical final effluent limitation</p>	<p>None necessary.</p>

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>reported concentrations of copper and zinc in stormwater after treatment). Although the Consent Decree stormwater discharge data reports the concentrations of metals discharged after treatment into the Generating Station's reverse osmosis treatment system where stormwater is recycled, to our knowledge and belief, the residual metals left over as a concentrated waste stream contain metals of even higher concentrations after reverse osmosis treatment and are discharged through the low volume waste discharge point displayed at EFF-001a in Diagrams 1 and 2).</p>	<p>exceedances occurred in 2004 for chlorine and oil and grease, and there are no other subsequent numerical effluent limitation exceedances during the term of the existing Order. Staff noted the concentrations of several metal parameters (mainly copper and zinc) in the retention basins effluent and storm water that, if low volume wastes were discharged alone, could result in exceedances of the Ocean Plan Table 1 water quality standards (within 1 or 2 orders of magnitude). However, as noted in response to Comment 6, the Discharger stated that the Facility had never discharged low volume wastes without the discharge of once-through cooling water, and staff has not been presented with any evidence to determine otherwise. Based on past monitoring data, the low volume waste flow contribute less than 1% of the total flow of the final combined effluent flow when a discharge of low volume wastes occurs. Additionally, in the Discharger's letter submitted to the Regional Water Board staff on 8/21/2015, the Discharger stated that the discharge of low volume wastes only occurs when at least one of the four circulating water pumps (once-through cooling water pumps) is operational, in which case the flow rate will be in the range of approximately 119,000 gallons per minute or 171 MGD (with one pump operating) to 2,061,190 gallons per minute or 685 MGD (with all four pumps operating). Therefore, due to the small volume of the low volume waste stream relative to the combined effluent flow including the once-through cooling water, the Table 1 parameter concentrations of the low volume wastes as presented are not large enough to affect the quality of the final combined effluent once it is</p>	

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
			<p>commingled with the once-through cooling water, to an extent that will cause the final combined effluent to exceed the water quality objectives of the Ocean Plan Table 1 parameters.</p> <p>Furthermore, effluents from the retention basins or other internal waste streams are internal effluents and do not represent the quality of the final combined effluent discharged from the Facility to the receiving water. Compliance with the final combined effluent limitations for the Table 1 parameters (which are prescribed to hold discharges from the Facility to a level that will ensure compliance with the Table 1 water quality objectives at the receiving water) are assessed based on the quality of the final combined effluent from the Facility, not the individual internal waste streams. Arsenic, cadmium, copper, lead, nickel, selenium, and zinc did not display reasonable potential in the final effluent, and therefore the proposed Order include semiannual monitoring requirements and not effluent limitations for these pollutants at Monitoring Location EFF-001 (final combined effluent stream). The proposed Order also includes semi-annual internal monitoring requirements for these pollutants to continually track and control the contribution of these pollutants into the Facility's final combined effluent stream.</p>	
Wishtoyo Foundation	8	Stormwater that falls on the Generating Station's highly galvanized power block, that because of coastal weathering contains high concentrations	As noted in staff's response to Comment 7, the effect of the discharge of storm water and RO wastes into the retention basins have been monitored and assessed	None necessary.

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>of dissolved zinc, flows to the floor drains and out EFF-001a or EFF-001b as a low volume waste. In addition, without evidence to demonstrate otherwise, it is reasonably likely that significant concentrations of metals in toxic concentrations from the Generating Station's Reverse Osmosis waste, the Seal Water, Condensate Overboard, Condensate Tank Drain, Condensate Demineralizer Regeneration, wastewaters from wet scrubber air pollution control systems, ion exchange water treatment system, water treatment evaporator blowdown, laboratory and sampling streams, auxiliary boiler blowdown, floor drains, cooling tower basin cleaning wastes, and recirculating house service water systems will discharge as low volume wastes from EFF- 001a. These processes all involve significant contact with old and weathered Generating Station infrastructure containing Table 1 Ocean Plan Metals or direct discharge of Table 1 Ocean Plan Metals into the low volume waste stream.</p>	<p>through the self-monitoring reports submitted by the Discharger under penalty of perjury, since the beginning of discharge of the RO wastes (1992) and storm water (fall 2013) into the retention basins. Staff agree that the additional types of discharge may affect the quality of the effluent from the retention basins. However, based on existing data and the relatively small amount of low volume waste flow from the Facility, measured concentrations of arsenic, cadmium, copper, lead, nickel, selenium, and zinc in the final effluent did not demonstrate reasonable potential. Hence, the proposed permit does not include effluent limits for these pollutants in the final effluent stream. Please refer to response to Comment 7.</p>	
Wishtoyo Foundation	9	<p>Furthermore, these low volume waste streams can discharge, and have discharged at different times of the year in significant volumes absent the discharge of once-through cooling wastes, thus warranting separate monitoring and the inclusion of effluent limits that apply to these discharges at the end of their pipes before mixing with ocean water. For instance, according to information obtained by Wishtoyo and its Ventura Coastkeeper Program during settlement</p>	<p>The Discharger confirmed with Regional Water Board staff on 8/19/2015 by phone and on 8/21/2015 by mail that no discharge of low volume waste had ever occurred from the Facility without the discharge of once-through cooling water waste.</p> <p>Staff noted and agree with the commenter's concern regarding the elevated contaminant levels that can potentially be discharged from the Facility if the discharge of low volume wastes occurs without the</p>	<p>Revision was made to section III in the Limitations and Discharge Requirement of the proposed</p>

Response to Comments
 NRG California South LP
 Ormond Beach Generating Station

Commenter	No.	Comment	Response	Action Taken
		<p>communications with the Generating Station: in March of 2010 there were 8 discharges of low volume wastes into the Pacific Ocean from the Generating Station totaling 1.82 million gallons; in October 2010 there were 11 discharges of low volume wastes into the Pacific Ocean the Generating Station totaling 1.31 million gallons; in April 2012 there were 7 discharges of low volume wastes into the Pacific Ocean the Generating Station totaling 1.16 million gallons; and in October 2012 there were 5 discharges of low volume wastes into the Pacific Ocean the Generating Station totaling 1.09 million gallons. These volumes of low volume waste streams are now are higher as they contain metals in the Generating Station's storm water discharges left over after Reverse Osmosis Treatment generated from a 5 year 24 hour event (3.68 inches) at the 35 acre Generating Station. This significant increase in magnitude of the Generating Station's discharges of its low volume waste stream attributed to stormwater containing metals at concentrations above the 2012 California Ocean Plan's water quality objectives, warrants sampling from, and effluent limits for, discharges of the Generating Station's low volume wastes before contact with ocean water in the Generating Station tunnel.</p>	<p>simultaneous discharge of once-through cooling water. Therefore, staff provide the following addition in section III (Discharge Prohibitions) in the Limitations and Discharge Requirements of the proposed Order to address this concern:</p> <p><u>J. The discharge of any in-plant waste streams from the Facility, specifically including the discharge of low volume wastes and storm water, is prohibited unless coincident with circulating water pump flows related to power generation or critical system maintenance. This prohibition is effective until the Facility achieves final compliance with the OTC Policy, prior to which the terms and provisions of this Order shall be reconsidered to account for the change of operation at the Facility.</u></p>	<p>Order.</p>