

Los Angeles Regional Water Quality Control Board

June 8, 2016

Mr. Anthony Chu, Chief
Environmental Assessment Branch
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Chu:

CHANGE SHEET FOR REVISED TENTATIVE WASTE DISCHARGE REQUIREMENTS (WDRs) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT – CALIFORNIA DEPARTMENT OF WATER RESOURCES, WILLIAM E. WARNE POWER PLANT (NPDES PERMIT NO. CA0059188, CI-6610)

On May 31, 2016, Regional Water Board staff transmitted the revised tentative Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) Permit for the William E. Warne Power Plant along with the Response to Comments. During the June 3, 2016, conference call between Regional Water Board staff (Staff) and representatives from the California Department of Water Resources' William E. Warne Power Plant (Facility), Facility representatives reiterated concerns regarding the effluent limitations for dissolved oxygen, nitrate plus nitrite, *E. coli*, chloride, bis (2-ethylhexyl) phthalate and chronic toxicity included in the revised tentative permit.

Regional Water Board staff has considered the comments and is recommending the following changes to the revised tentative permit for the Regional Water Board's consideration. The proposed changes, which are included in the attached change sheet, are described below.

1. Removal of effluent limitations for bis (2-ethylhexyl) phthalate.

During the past six years, there was only one detected concentration at each discharge point. The detected concentration at Discharge Point 001(A&B) and 002 occurred on February 25, 2013 and February 10, 2011, respectively. The detected result may be the result of sample contamination since it is the only occurrence during the six year monitoring period. When this data point is not considered, there is no reasonable potential for bis (2-ethylhexyl) phthalate; therefore, effluent limitations for bis (2-ethylhexyl) phthalate have been removed. However, the proposed permit retains the monthly monitoring requirement for this pollutant for data collection.

2. Additions of intake water credits for nitrate plus nitrite and *E. coli*.

Regional Water Board staff agrees nitrate plus nitrite and *E. coli* may be present in the intake water. Therefore, Staff recommends intake water credits to be used to evaluate compliance for these pollutants. The Discharger shall comply with the effluent limitation of the individual pollutant if the concentration in the intake water is less than the respective

effluent limitation. If the concentration of the pollutant in the intake water is greater than the effluent limitation, the concentration of the effluent for the pollutant shall be less than or equal to the concentration in the intake water. If the concentration in the effluent exceeds the concentration in the intake water, the discharge is in violation of the requirements.

3. Addition of influent monitoring requirements for nitrate plus nitrite and *E. coli*.

In order to implement intake water credits for nitrate plus nitrite and *E. coli* in the proposed permit, quarterly monitoring for these pollutants are included in the proposed permit. For *E. coli*, five sampling events are required within a quarter in order to generate a geometric mean for compliance determination.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'David Hung', with a stylized flourish extending to the right.

David Hung, P.E., Chief
Watershed Regulatory Section

Enclosures

(via email only):

Leah McNearney, California Department of Water Resources
Diane Shimizu, California Department of Water Resources
Betsy Elzufon, Larry Walker Associates