



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

February 9, 2007

Mr. Roy Craft
Plant Manager
El Segundo Power, LLC
301 Vista Del Mar, El Segundo, CA 90245

SUPPLEMENTAL DATA PACKAGE FOR REPORT OF WASTE DISCHARGE (ROWD) APPLICATION FOR EL SEGUNDO POWER, LLC; EL SEGUNDO GENERATING STATION, NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NO. CA0001147, CI-4667

Dear Mr. Craft:

A letter dated January 16, 2007, submitted by El Segundo Power, LLC (ESP) to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board), provided supplemental information and requested that the Regional Board staff revise the NPDES permit renewal package for ESP. The discharge through Outfall 001 from existing generating units 1 and 2 was to be replaced with the proposed new generating units 5, 6, and 7. Additional information will be required to expedite the approval of your permit application and to meet the scheduled permit renewal date of June 2007. Please provide the information described below no later than March 9, 2007, to expedite the permit renewal.

The supplemental information declared that ESP intends to maintain the existing Cooling Water Intake Structure (CWIS) unchanged. Consequently, the Regional Board concurs with your assessment and will continue our previous determination that the facility CWIS is classified as an existing facility for purposes of compliance with the Clean Water Act, 316(b) Phase II Rule for existing facilities.

Concerning the discharge from Outfall 001, please note that on February 15, 2005, the Regional Board had directed ESP to provide additional information needed to proceed with the permit renewal. ESP has yet to provide satisfactory responses to that information. In particular:

1. Under 40 CFR, §122.21, Subpart B (m) (2), you must provide evidence of a variance under the Clean Water Act (CWA), Section 301(g), for chlorine.
2. Per the 2005 California Ocean Plan, Section III.C.3.e, you must submit to the Regional Board an up-to-date hydrodynamic model study or provide the specific rationale to justify, or update, any dilution ratio for the discharge from Outfall 001 and Outfall 002. The Regional Board staff will submit this information to the California State Water Resources Control Board (State Board) for approval.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

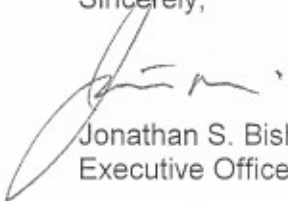
Further, based on the supplemental information, the new generating units 5, 6, and 7 are subject to the CWA New Source Performance Standards (NSPS). The supplemental information to the NPDES permit application must address the above requested information (items 1 and 2), and the following additional information for the new generating units:

3. The new generating units must show compliance with the technology-based effluent limitations for steam electric generating industry as described in 40 CFR 423.15.
4. The Effluent limitation (EL) for total residual chlorine is 0.2 mg/L for existing facilities. ESP obtained a variance for total residual chlorine in 1996, with a modified limitation of 0.4 mg/L. Continuation of the variance is subject to reapplication on the part of ESGS to the relevant resource agencies. Until such time as a variance, if any, is granted the NSPS (0.2 mg/L) for total residual chlorine applies.
5. The 2005 Ocean Plan establishes a BPJ standard for evaluating reasonable potential in new source discharges if effluent characterization data is unavailable. When developing water quality-based EL for pollutants contained in Table B of the Ocean Plan for new source discharge, the Regional Water Board will consider the following factors:
 - a. Water quality objectives and standards;
 - b. Up-to-date hydrodynamic model study to provide the specific rationale to justify, or update, any dilution ratio for the discharge from Outfall 001 (and Outfall 002 per the February 15, 2005 letter);
 - c. Type of discharge;
 - d. Basin Plan objectives; and
 - e. Receiving water quality and potential toxicity of the discharge.

Thus, in order to expedite the approval of your permit application and meet the Regional Board intent to renew your permit by June 2007, you are directed to provide the above information by no later than March 9, 2007.

If you have any questions, please contact Dr. Tony Rizk at 213/576-6756.

Sincerely,



Jonathan S. Bishop
Executive Officer

cc: See mailing list

Mailing List

U. S. Environmental Protection Agency, Region 9, Permit Branch (WTR-5)
Ms. Nancy Yoshikawa, U. S. Environmental Protection Agency, Region 9
Ms. Robyn Stuber, U. S. Environmental Protection Agency, Region 9
U.S. Army Corps of Engineers
Mr. Rob Hoffman, NOAA National Marine Fisheries Service
Department of Interior, U. S. Fish and Wildlife Service
Mr. Michael Levy, State Water Resources Control Board, Office of Chief Counsel
Mr. Jim Maughan, State Water Resources Control Board, Division of Water Quality
Mr. Dominic Gregorio, State Water Resources Control Board, Division of Water Quality
Mr. James Reed, California Energy Commission
Mr. Rick York, California Energy Commission
Mr. Tom Luster, California Coastal Commission
Mr. William Paznokas, California Department of Fish & Game, Region 5
Mr. Guangyu Wang, Santa Monica Bay Restoration Commission
Department of Health Services, Sanitary Engineering Section
California State Parks and Recreation
South Coast Air Quality Management District
Water Replenishment District of Southern California
Los Angeles County, Department of Public Works, Waste Management Division
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Mr. Mark Gold, Heal the Bay
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Mr. Tim Havey, TetraTech
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Mr. Scott Seipel, Shaw Environmental & Infrastructure, Inc.
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