

Los Angeles Regional Water Quality Control Board

February 4, 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:

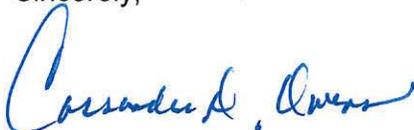
CHANGE OF PUBLIC HEARING SCHEDULE, RESPONSE TO COMMENTS AND REVISED TENTATIVE WASTE DISCHARGE REQUIREMENTS (WDRs) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT – LONG BEACH GENERATION LLC, LONG BEACH GENERATING STATION (NPDES PERMIT NO. CA0001171, CI-5764)

On December 9, 2015, we transmitted you tentative Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) Permit for the Long Beach Generation, LLC – Long Beach Generating Station. Regional Board staff considered your comments submitted on January 12, 2016, the public comment deadline. Enclosed are the Response to Comments (RTC) and the revised pages 6, E-5, E-8, and E-13, in the revised tentative permit that reflect changes addressed in the RTC. Other portions of the revised tentative permit are not enclosed since they remain unchanged from the previous mailout. Changes on the revised pages appear in the strikeout/underline format.

In the December 9, 2015 letter, we also informed you that the Board Hearing would be held on February 11, 2016, at 9:00 a.m., at Metropolitan Water District of Southern California, Board Room, 700 North Alameda Street, Los Angeles, California. The date when this item will be considered has been changed to March 10, 2016. The venue and start 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

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

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February 4, 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 Alamosa, LLC
Katherine Rubin, Los Angeles Department of Water & Power
Scott Seipel, NRG Energy, Inc.
Kristy Allen, Tetra Tech

the Discharger shall set congener concentrations below the minimum levels to zero. USEPA method 1613 may be used to analyze dioxin and furan congeners.

$$\text{Dioxin-TEQ (TCDD Equivalents)} = \sum(C_x \times \text{TEF}_x)$$

Where,

C_x = concentration of dioxin or furan congener x

TEF_x = TEF for congener x

Toxicity Equivalency Factors for 2,3,7,8-TCDD Equivalents

Congeners	Minimum Levels	Toxicity Equivalency Factors
2,3,7,8 - tetra CDD	10	1.0
1,2,3,7,8 - penta CDD	50	1.0
1,2,3,4,7,8 - hexa CDD	50	0.1
1,2,3,6,7,8 - hexa CDD	50	0.1
1,2,3,7,8,9 - hexa CDD	50	0.1
1,2,3,4,6,7,8 - hepta CDD	50	0.01
Octa CDD	100	0.0001
2,3,7,8 - tetra CDF	10	0.1
1,2,3,7,8 - penta CDF	50	0.05
2,3,4,7,8 - penta CDF	50	0.5
1,2,3,4,7,8 - hexa CDF	50	0.1
1,2,3,6,7,8 - hexa CDF	50	0.1
1,2,3,7,8,9 - hexa CDF	50	0.1
2,3,4,6,7,8 - hexa CDF	50	0.1
1,2,3,4,6,7,8 - hepta CDFs	50	0.01
1,2,3,4,7,8,9 - hepta CDFs	50	0.01
Octa CDF	100	0.0001

B. Land Discharge Specifications – Not Applicable

C. Recycling Specifications – Not Applicable

V. RECEIVING WATER LIMITATIONS

A. Surface Water Limitations

The discharge shall not cause the following in the Long Beach Inner Harbor.

1. The normal ambient pH to fall below 6.5 nor exceed 8.5 units nor vary from normal ambient pH levels by more than 0.2 units.
2. Surface water temperature to rise greater than 5° F above the natural temperature of the receiving waters at any time or place. At no time shall the temperature be raised above 80° F as a result of waste discharged.
3. Water Contact Standards

In marine water designated for water contact recreation (REC-1), the waste discharged shall not cause the following bacterial standards to be exceeded in the receiving water.

- a. Rolling 30-day Geometric Mean Limits
 - i. Total coliform density shall not exceed 1,000/100 ml.
 - ii. Fecal coliform density shall not exceed 200/100 ml.
 - iii. Enterococcus density shall not exceed 35/100 ml.

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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 a bypass 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 prolonged bypass discharges, only one sample per week 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.

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

a. The start of the bypass; or

4.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 when sampling conditions are safe.

Table E-2. Effluent Monitoring

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Flow	MGD	Meter	Continuous ¹	--
Temperature	°F	Meter	Continuous ¹	3
pH	standard units	Grab or Meter	1/Day	3

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1,2,3,7,8,9 - hexa CDF	50	0.1
2,3,4,6,7,8 - hexa CDF	50	0.1
1,2,3,4,6,7,8 - hepta CDFs	50	0.01
1,2,3,4,7,8,9 - hepta CDFs	50	0.01
Octa CDF	100	0.0001

9. Priority Pollutants as defined by the CTR and listed in Attachment I of this Order.
10. Analyze these radiochemicals by the following USEPA methods:

Method 900.0 for gross alpha and gross beta; Method 903.0 or 903.1 for radium-226;
Method 904.0 for radium-228; Method 906.0 for tritium;
Method 905.0 for strontium-90; Method 908.0 for uranium.

Analysis for uranium shall be conducted only if gross alpha results for the same sample exceed 15 pCi/L, or beta greater than 50 pCi/L. If the uranium result is greater than 20 pCi/L, analysis for radium-226 & 228 shall be conducted. If the combined radium-226 & 228 exceeds 5 pCi/L, analyze for tritium and strontium-90.

11. Generally not less than five (5) samples should be taken equally spaced over a 30-day period with the first sample taken in the monitoring month (February, May, August, or November) for the required quarter. The results will provide sufficient data for the calculation of the geometric mean values.

2. Effluent Sediment Monitoring at Monitoring Location EFF-001

Effluent sediment monitoring is only required during years in which any exceedance occurs as described in Footnote 1 to the following table. If effluent sediment monitoring is not triggered by an exceedance, effluent sediment monitoring must be conducted as described here at least once during the permit term.

The Discharger must sample the discharge at the discharge points following final treatment, prior to the discharge entering the receiving water. The Discharger must collect sufficient effluent sample to provide an adequate amount of effluent sediments (suspended solids) for sediment analyses.

Table E-3. Sediment Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency	Method
Copper, Total Recoverable	mg/kg	Grab	1/Year ¹	2
Lead, Total Recoverable	mg/kg	Grab	1/Year ¹	2
Zinc, Total Recoverable	mg/kg	Grab	1/Year ¹	2
DDT ³	mg/kg	Grab	1/Year ¹	2
PAHs ⁴	mg/kg	Grab	1/Year ¹	2
PCBs ⁵	mg/kg	Grab	1/Year ¹	2

1. Annual monitoring is required when it is triggered by an exceedance as specified in Footnote to Table 4 of this Order. If monitoring is not triggered because of an exceedance, sediment monitoring must occur at least once during the five year permit term.
2. Pollutants shall be analyzed in accordance with USEPA or ASTM methodologies where such methods exist. Where no USEPA or ASTM methods exist, the State Water Board or Regional Water Board shall approve the use of other methods. Analytical tests shall be conducted by laboratories certified by the State Water Board in accordance with Water Code section 13176.
3. The State Water Board *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality*, August 25, 2009, (known as Sediment Quality Plan, Attachment A) listed

R E V I S E D T E N T A T I V E

A. Monitoring Location RSW-001

1. The Discharger shall monitor the Long Beach Inner Harbor at Monitoring Location RSW-001 as follows:

Table E-4. Receiving Water Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
pH	standard units	Grab	1/Quarter	1, 2
Temperature	°F	Grab	1/Quarter	1, 2
Salinity	parts per thousand (ppt)	Grab	1/Quarter	1, 2
<u>Turbidity</u>	<u>NTU</u>	<u>Grab</u>	<u>1/Quarter</u>	<u>1</u>
Total Ammonia (as N)	mg/L	Grab	1/Quarter	1, 2
Total Coliform	MPN/100 mL	Grab	5/Quarter ³	1
Fecal Coliform	MPN/100 mL	Grab	5/Quarter ³	1
<i>Enterococcus</i>	MPN/100 mL	Grab	5/Quarter ³	1
Remaining Priority Pollutants ⁴	µg/L	Grab	1/Year	1

1. Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136; for priority pollutants, the methods must meet the lowest MLs specified in Attachment 4 of the SIP, where no methods are specified for a given pollutant, by methods approved by this Regional Water Board or the State Water Board. 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.
2. Receiving water samples for pH, temperature, salinity and ammonia must be collected at the same time.
3. Generally not less than five (5) samples should be taken equally spaced over a 30-day period with the first sample taken in the monitoring month (February, May, August, or November) for the required quarter. The results will provide sufficient data for the calculation of the geometric mean values.
4. Priority Pollutants as defined by the CTR defined in Finding II.I of the Limitations and Discharge Requirements of this Order, and included as Attachment I.

IX. HARBOR TOXICS TMDL MONITORING

The Discharger may act independently or join a group already formed to conduct the Harbor Toxics TMDL monitoring including the following components as described in section VI.C.2.c of the Order.

A. Greater Los Angeles and Long Beach Harbor Waters Water Column Monitoring

Water samples and total suspended solids (TSS) samples shall be collected during two wet weather events and one dry weather event each year. TSS shall be collected at several depths during wet weather events. The first large storm event of the season shall be included as one of the wet weather events. General water chemistry (temperature, dissolved oxygen, pH and salinity) and a flow measurement shall be required at each sampling event.

B. Greater Los Angeles and Long Beach Harbor Waters Sediment Monitoring

Sediment chemistry samples shall be collected every five years. The analysis shall include the chemical suite, two toxicity tests and four benthic indices as specified in the State Water Quality Control Plan for Enclosed Bays and Estuaries—Part 1 Sediment Quality.

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