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April 3, 2006

Mr. Jonathan Bishop
California Water Quality Control Board
Los Angeles Regions
320 W. 4th Street, Suite 200
Los Angeles, California 90013

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CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Subject: Response to Comments to Phase II 316(B) Proposal for Information Collection and Impingement Mortality and Entrainment Characterization Study Sampling Plan for Reliant Energy Mandalay and Ormond Beach Generating Stations.

Dear Mr. Bishop,

Reliant has received and reviewed the Los Angeles Regional Water Quality Control Board's (LARWQCB) comments on the Phase II 316(b) Proposal for Information (PIC) and Impingement Mortality and Entrainment (IM&E) Characterization Study Sampling Plan (Sampling Plan) for Reliant's Mandalay and Ormond Beach generating facilities. As we described in our meeting with the staff on January 23, 2006, Reliant, through its expert consultant ENSR, intended for the PICs to conform to the specific requirements of the EPA Phase II rule, to describe our proposed plans for information collection and to provide our current, overall perspective on this effort including preliminary assessment of available data on impingement and entrainment. While we believe the PICs accomplish those objectives, we appreciate the LARWQCB's perspectives and will address the bulk of staff's comments in our updates to the PICs and associated correspondence. The intent of this letter is to:

- identify changes that Reliant has already made to the sampling programs based on our meeting with LARWQCB in January;
- outline three outstanding issues identified in the comment letter and in our January meeting; and
- request a meeting with LARWQB to address these issues and determine how to move forward expeditiously.

Sampling Plan Changes

Based upon the January meeting between LARWQCB staff and Reliant, we have already incorporated three important changes into the sampling programs for Mandalay and Ormond Beach. The changes include: (1) modification of the sampling at each station to include impingement mortality and entrainment (IM&E) sampling at 6-hour intervals; (2) change in sampling location for entrainment to within the Edison Canal at the Mandalay facility and at the velocity cap for the Ormond Beach facility; and (3) addition of a study to quantify benefits from the velocity cap at Ormond Beach. The first two of these changes have been instituted in the ongoing programs while the details of

the third are still being developed. All three changes will be described in our updated sampling plans.

Items for Discussion

Reliant believes that three key outstanding items need further discussion and resolution. The three items are (1) the determination of the extent of the Cooling Water Intake Structure (CWIS) at Mandalay, (2) the need for ambient sampling and the location and number of such ambient samples, and (3) the estimation of the zone of hydraulic influence. These three items affect the scope and content of the Sampling Plan. For this reason, particularly in light of the limited timeline to conduct sampling and for preparation of the Comprehensive Demonstration Study, Reliant feels that it is imperative that these items be addressed as soon as possible. Thus, Reliant would like to meet with the LARWQCB as soon as is feasible to discuss these items.

Definition of the CWIS at Mandalay

LARWQCB raised several questions about the relationship of the canal to the CWIS and noted that they have sought guidance from the EPA on this issue, which we support. We anticipate that their response will advise that the intake, for purposes of IMECS sampling, begins at the withdrawal point from waters of the US. As such, Reliant has and will continue to monitor impingement and entrainment directly at the plant intake. As you know, however, the regulations allow the cooling water intake system to be considered more broadly so that credit under the calculation baseline concept can be realized, i.e. credit for a hypothetical intake design and location can be made. EPA has not addressed the methodology for defining the calculation baseline at this time, though intends to in an upcoming Q&A. Reliant would be pleased to discuss with LARWQCB staff the relative merits of the various alternatives for defining Mandalay's CWIS to achieve this baseline adjustment.

Ambient Sampling

The EPA Phase II regulations represent a substantial change in course from EPA's prior approach to BTA for once-through cooling systems. Under these rules, adverse effects are assumed regardless of the level of impact, if any, on ambient levels of fish populations. Because of the new requirements of the federal rule and because Mandalay and Ormond are not within Santa Monica Bay, where cumulative impacts are considered a significant potential issue, Reliant has not focused on ambient sampling. As such, Reliant would like to further discuss the basis and need for ambient sampling at the Mandalay and Ormond Beach facilities. The LARWQCB has indicated that ambient sampling is necessary for consistency with Sampling Plans proposed by other coastal power plants in the Los Angeles Region as well as for consistency with Mandalay and Ormond Beach's current NPDES permit compliance requirements. However, the plants in the Los Angeles Region have proposed or agreed to ambient sampling based on the need to support restoration and have indicated that ambient sampling would be suspended if restoration is remanded by the Federal Court. Additionally, ambient sampling is only part of Mandalay's NPDES permit requirements and the sampling performed as part of these requirements have different data objectives than those of ambient sampling for IM&E. For these reasons, Reliant would like to clarify with LARWQCB staff the basis, need, and data objectives of an ambient sampling program.

Zone of Hydraulic Influence

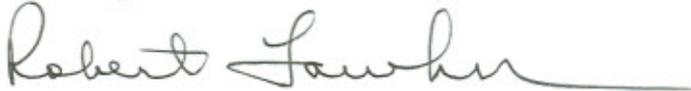
Reliant believes that there are several methods to estimate the Zone of Hydraulic Influence (ZOHI) and that the rule does not provide perspective on which is preferred. . We believe that our method of calculating the ZOHI based on intake-induced velocities relative to ambient is valid and appropriate, but we would certainly consider other options. We understand that other parties have proposed at least two other methods for estimating the ZOHI. We would like to further discuss any preferences the RWQCB may have in this regard.

Meeting with LARWQCB staff

As outlined above, Reliant feels that there are important topics that we need to discuss with the LARWQCB staff. Given the limited time to complete the sampling, we feel these issues need to be resolved as soon as possible. For this reason we are requesting a meeting with LARWQCB staff at your earliest convenience.

Reliant appreciates your attention to these issues and looks forward to their resolution in a timely fashion. Please contact me at (702) 407-4884 or Rlawhn@reliant.com regarding a date when we can meet to resolve these important issues.

Sincerely,



Robert Lawhn
Environmental Director

Cc: Tony Rizk