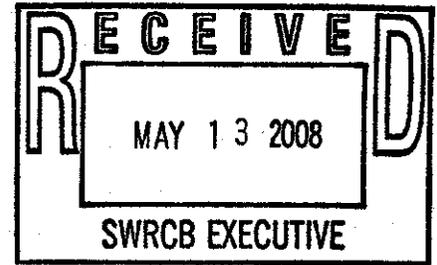




Surfrider Foundation

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May 8, 2008

TO: Staff; State Water Resources Control Board (State Water Board).

RE: Scoping Document: Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling.

Suggested document clarifications and corrections:

Pg.3 Table 2. "Flow and Power Production Summary for OTC Power Plants." States electrical units of power generated as GWh. GWh are electrical units of energy. Electrical units of power are GW (GigaWatts) and MW (megawatts). The table more correctly should indicate the power as GWh/yr. and provide a note: "to convert GWh per year to power divide GWh by 8760 (number of hrs. in a year) and the multiply by 1000 to convert GW to MW." (Reference; California Energy Commission 2006 Annual Report). The link to the EPA reference; <http://www.epa.gov/airmarkets/emissions...> replies FILE NOT FOUND.

Pg. 7. Figure 2. "OTC Power Generation by technology." States electrical units of power generated as MWh. Should be MWh/yr. and the same note as stated above.

Pg.9. Figure 3. "2000-2005 Combined Annual Cooling Water Flow Data vs. Total Power Generated." For the same reason as stated above, OTC Generation is stated as GWh. It should be stated as GWh per 5yr. period, or re-titled as "...Total Energy Generated."

Pg. 10. Figure 4. "Average Cooling Water Flow: Power Generation Ratios for OTC Power Plants." The chart title is "...Power Generation..." but the units are in electrical energy units (GWh) and should be corrected as noted above.

In general; units of electrical power are; kW, MW, and MWh/yr. Units of electrical energy are kWh.,MWh.and GWh. Power plants generate power (MW), but they sell energy (kWh.).

Also, pgs. 59 (Alamitos plant) and 65 (Haynes plant) state "...the current receiving water (San Gabriel River) may not meet the criteria establishing it as "hydrologically connected" to the Los Cerritos Channel (State Water Board 2000)." This may require a clearer definition of the source of information for this statement.

With the exception of these few comments, this scoping document appears to be a clear and accurate guide to formulating a comprehensive State Policy. Keep up the great work.

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