State of California
CALIFORNIA LOS ANGELES WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

ORDER R4-2025-0184

TERMINATION OF WASTE DISCHARGE REQUIREMENTS (WDRs) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT; WATER CODE SECTION 13383 ORDER TO PERFORM ADDITIONAL MONITORING AND REPORTING OF STORMWATER DISCHARGES

for

DISCHARGES FROM AES REDONDO BEACH LLC – REDONDO BEACH GENERATING STATION, 1100 N HARBOR DR., REDONDO BEACH, CA 90277 (NPDES No. CA0001201)

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board), finds:

1. On June 9, 2016, the Los Angeles Water Board adopted Order No. R4-2016-0222, which serves as Waste Discharge Requirements (WDRs) and a National Pollutant Discharge Elimination System (NPDES) permit for the Redondo Beach Generating Station (Facility), a former steam-powered electric generating facility. The Facility used once-through cooling (OTC) water drawn via circulation pumps from two submerged intake structures within King Harbor and one located just outside the King Harbor breakwater. The Facility was operated by AES Redondo Beach LLC (Discharger).
2. The Facility has also been regulated under the State Water Resources Control Board's (State Water Board), *Policy for the Use of Coastal and Estuarine Waters for Power Plant Cooling* (OTC Policy). The OTC Policy was first adopted under Resolution Number 2010-0020. It became effective on October 1, 2010, and was amended in 2012, 2014, 2016, 2017, 2020, 2021, and 2023. The OTC Policy established uniform, technology-based standards to implement federal Clean Water Act Section 316(b), requiring that the location, design, construction, and capacity of cooling water intake structures reflect the best technology available (BTA) to minimize adverse environmental impacts on marine and estuarine life.
3. The OTC Policy established two compliance options for owners or operators of existing power plants: Track 1 and Track 2. Track 1 required a minimum 93 percent reduction in the use of seawater to cool steam for generating electricity. The actions to achieve Track 1 compliance include the permanent shutdown of all steam-powered electric generating units. Track 2 required implementation of mechanical upgrades and seasonal operation to reduce intake flow rates equivalent to what would be achieved through Track 1 compliance. The Discharger elected to comply with the OTC Policy by permanently shutting down its generating units (i.e., Track 1). The OTC Policy originally included a final compliance date for the Facility of December 31, 2020.

4. The OTC Policy is implemented through Order No. R4-2016-0222. Order No. R4-2016-0222 became effective on October 1, 2016. This permit authorizes the discharge of up to 215 million gallons per day (MGD) of combined wastewater consisting of OTC water, low-volume in-plant wastewater, groundwater seepage, and stormwater to the Pacific Ocean through Discharge Point 001. It also authorizes the discharge of up to 674 MGD of combined wastewater consisting of OTC water and stormwater to King Harbor through Discharge Point 002.
5. In conjunction with Order No. R4-2016-0222, the Los Angeles Water Board adopted Time Schedule Order (TSO) No. R4-2016-0223 on June 9, 2016. The TSO provided the Discharger interim effluent limitations for temperature, pH, copper, and nickel and established a compliance schedule for tasks and milestones to allow the Facility time to comply with the permit requirements and the OTC Policy by permanently shutting down the electric generating units on a phased schedule.
6. On September 1, 2020, the State Water Board amended the OTC Policy to extend the compliance deadline for the Facility for another year, until December 31, 2021.
7. On December 10, 2020, the Los Angeles Water Board adopted Order No. R4-2016-0222-A01 and TSO No. R4-2020-0139, to update the NPDES permit and TSO to incorporate the revised compliance deadline of December 31, 2021. Order No. R4-2016-0222 expired on September 30, 2021. However, the terms and conditions of Order No. R4-2016-0222-A01, including the accompanying Monitoring and Reporting Program, were administratively extended pursuant to 40 CFR section 122.6 and 23 California Code of Regulations section 2235.4.
8. On September 15, 2021, the Discharger requested an extension of the TSO compliance deadline to align with the State Water Board's proposed amendment of the OTC Policy to extend the Facility's compliance date by two years to December 31, 2023.
9. On October 19, 2021, the State Water Board approved an amendment to the OTC Policy extending the compliance deadline for the Facility's three remaining generating units, Units 5, 6, and 8, to December 31, 2023.
10. On August 15, 2024, the Discharger notified the Los Angeles Water Board that discharges of OTC water through Discharge Points 001 and 002 had been eliminated and power generating Units 5, 6, and 8 were permanently removed from service on January 1, 2024, by disconnecting and de-energizing the eight circulation pumps used for OTC water. The Discharger ensured the pumps could no longer withdraw cooling water by removing the breaker for each pump from its cubicle, locking out electrical service, and attaching a "Do Not Operate" tag in compliance with NFPA 70E 110.3 (a National Fire Protection Association standard for electrical safety). The breakers for Units 7 and 8 were removed on December 29, 2023, Unit 5 on December 30, 2023, and Unit 6 on January 2, 2024. As a result, the Facility is no longer capable of discharging OTC water from the generating station. On September 17, 2024, Los Angeles Water Board staff conducted an inspection and verified that the Facility is no longer operable for OTC discharges to the Pacific Ocean and King Harbor.

11. In addition to eliminating power to the OTC circulating water pumps, the Discharger is actively removing all hazardous materials and hazardous waste from the Facility and has eliminated all OTC wastewater, low-volume wastewater discharges, and groundwater seepage. Since the Discharger has ceased all industrial activities at the Facility, and there is no longer any potential for wastewater discharges currently regulated under Order No. R4-2016-0222 to continue, the Los Angeles Water Board has determined that termination of Order No. R4-2016-0222 is appropriate.

12. Despite the shutdown of all the Facility's steam electric power generating units, stormwater is expected to be discharged from the Facility. The Clean Water Act stormwater program regulates stormwater discharges in three primary categories: municipal stormwater, construction stormwater, and industrial stormwater. The Facility's current demolition and decommissioning activities operations are not expected to expose soil and therefore do not require NPDES permit coverage for potential discharges of construction stormwater. Industrial stormwater discharges are required to obtain an NPDES permit if they fall into one of the specific categories listed in 40 CFR section 122.26(b)(14). These categories of industrial stormwater dischargers can obtain an individual permit by filing a Report of Waste Discharge with the appropriate regional board or by enrolling in the Statewide Industrial General Permit, Order WQ 2014-0057-DWQ, as Amended by Order WQ 2015-0122-DWQ & Order WQ 2018-0028-DWQ. Additionally, the Los Angeles Water Board can use its "regional designation" authority under 40 CFR 122.26(a)(9)(i)(C) and (D) to require additional categories of stormwater to obtain an NPDES permit on a case-by-case basis.

13. Previously, the Discharger was required to obtain NPDES permit coverage for its stormwater because the Facility was a steam electric power generating facility. (40 CFR section 122.26(b)(14)(vii).) Since the Facility has been decommissioned, it only requires an NPDES permit for its stormwater if there is qualifying industrial activity at the site, including any "areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water". (Id.) Los Angeles Water Board staff inspected the Facility and determined there were no active industrial operations on-site that required NPDES permit coverage. Los Angeles Water Board staff also requested that the Discharger conduct limited stormwater sampling to evaluate whether significant materials related to the Facility's historic industrial activity remained and would be potentially exposed to stormwater.

14. The Discharger voluntarily conducted stormwater monitoring of discharges from the Facility. Samples were collected on February 13, 2025, at a vault located near the Units 5 and 6 Intake at the Facility and analyzed by a laboratory certified by the State Water Board's Division of Drinking Water Environmental Laboratory Accreditation Program (ELAP). Upon reviewing the monitoring data submitted by the Discharger, the Los Angeles Water Board identified several pollutants that exceeded either applicable water quality objectives in the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) or the effluent limitations in the Facility's current NPDES Permit (Order No. R4-2016-0222) associated with former power plant operations. Pollutants found to exceed these thresholds include enterococci, copper, mercury,

lead, nickel, and zinc. As a result, the Los Angeles Water Board is requiring additional monitoring for these and additional parameters of concern to the Los Angeles Water Board as specified in Finding 1.d below. Monitoring for these parameters is needed so the Los Angeles Water Board can determine if an NPDES permit is required for the stormwater discharge from the Facility notwithstanding the cessation of industrial activities at the Facility. This proposed monitoring is reasonable based on the proximity of detected values to water quality objectives from the Basin Plan, indicator parameters that are required to be monitored under the Industrial General Permit (IGP) for stormwater discharges, and the effluent limit guidelines and standards in 40 CFR Part 423, pertaining to Steam Electric Power Generation facilities. Ongoing exceedances of these parameters could be an indication that stormwater is still exposed to past industrial activity and would assist the Los Angeles Water Board with determining whether the Facility's stormwater should be regulated with an NPDES permit, and to develop appropriate permit limitations and requirements if an NPDES permit is required.

15. The Discharger also proposed the implementation of best management practices (BMPs), including good housekeeping measures, routine inspections, and monthly street sweeping during periods of onsite activity. The Discharger plans to install covers over storm drains in active areas during non-rainy periods and deploy pollutant removal filter socks at key storm drain locations throughout the Facility prior to forecasted rain events.

16. Nevertheless, additional information is needed to determine if stormwater discharges from the Facility have the potential to carry pollutants associated with historic industrial activity and/or if other on-site activities should be regulated through the NPDES permitting program. Therefore, the Los Angeles Water Board has determined that additional monitoring of stormwater discharges from the Facility is necessary.

17. California Water Code (CWC) section 13383 provides the Los Angeles Water Board the authority to require monitoring and reporting for any person discharging or proposing to discharge pollutants into waters of the United States. Subdivision (b) of section 13383 authorizes the Los Angeles Water Board to require any person subject to section 13383 to "sample effluent as prescribed and provide other information as may be reasonably required."

18. The requested technical and monitoring information is reasonably required because the Los Angeles Water Board will use this data and information to determine if stormwater from the Facility should be regulated under the NPDES permitting program, even though its industrial operations have ceased. The request for this technical and monitoring information will also provide the Los Angeles Water Board with the necessary information it needs to evaluate the sources of pollution and determine the effectiveness of pollution control BMPs implemented at the Facility. If an NPDES permit is needed, this information will be used to help the Los Angeles Water Board develop appropriate permit requirements and the associated monitoring program. Although there is no explicit requirement to consider monitoring and reporting costs in Water Code section 13383, the Los Angeles Water Board

considered the costs associated with the monitoring required by this Order (estimated between $15,000 and $30,000) and found them reasonable given the need to evaluate the potential impacts to beneficial uses of the receiving water, the Pacific Ocean and King Harbor.

19. The issuance of this Order is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) in accordance with Water Code Section 13389 because it terminates an NPDES permit, and the information gathered pursuant to this Order may be used to develop a future NPDES permit. The requirements to conduct supplemental monitoring and reporting under Water Code section 13383 are also categorically exempt from CEQA under California Code of Regulations, title 14, section 15306, as it requires monitoring and reporting of stormwater runoff for the purpose of gathering information. This Order is also categorically exempt from CEQA under California Code of Regulations, title 14, section 15308, because the issuance of this Order is an action by a regulatory agency for protection of the environment. Compliance with this Order is not expected to result in any significant physical changes to the environment.
20. Failure to comply with this Order, or falsifying any information provided therein, may result in enforcement action including civil liabilities for late or inadequate reports consistent with Water Code section 13385.
21. Any person aggrieved by this action of the Los Angeles Water Board may petition to the State Water Resources Control Board (State Water Board) to review the action in accordance with CWC section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at following link or may be provided upon request: https://www.waterboards.ca.gov/public_notices/petitions/water_quality.
22. The Los Angeles Water Board has notified the Discharger and interested agencies and persons of its intent to terminate Order No. R4-2016-0222 as amended, as well as requiring additional monitoring of stormwater discharges from the Facility and has provided them with an opportunity to comment.
23. The Los Angeles Water Board, in a public meeting, heard and considered all comments pertaining to the tentative termination of Order No. R4-2016-0222.

IT IS HEREBY ORDERED that the following WDRs/NPDES permit be terminated, except for purposes of enforcement:

DISCHARGER NAME (NPDES NO.)	ORDER NO. (ADOPTION DATE)	REASON FOR TERMINATION
AES Redondo Beach LLC (CA0001201)	Order R4-2016-0222 (Adopted on June 9, 2016)	The Discharger has ceased industrial operations and eliminated the discharge of

DISCHARGER NAME (NPDES NO.)	ORDER NO. (ADOPTION DATE)	REASON FOR TERMINATION
	Amendment R4-2016-0222-A01 (Adopted on December 10, 2020)	wastewater commingled with stormwater into the Pacific Ocean and King Harbor.

IT IS ALSO ORDERED, pursuant to CWC Section 13383, that AES Redondo Beach LLC is required to submit the following as specified below:

1. **Workplan**

   Within 90 days of the adoption date of this Order, the Discharger shall submit a Workplan detailing its stormwater monitoring plan. The Workplan shall, at a minimum, include the following:

   a. **Representative sampling point(s)**: Identify proposed representative sampling point(s) for stormwater discharges from the Facility.

   b. **Sampling schedule**: Sampling is only required when a discharge occurs from the Facility into the receiving water(s). The Discharger shall provide in the workplan the schedule for collecting stormwater samples at the representative sampling point(s) identified in Item 1.a. for each qualifying storm event. A qualifying storm event is defined as a rainfall event of 0.1 inch or more that generates sufficient flow for sampling and is preceded by at least 72 hours of dry weather (with no measurable discharge). Sampling must occur during the next three storm seasons (i.e. 2025–2026, 2026–2027, and 2027–2028) or until 10 discharge events have been monitored, whichever occurs first. For purposes of these sampling events, the storm season for the region is generally considered to run from October through May. Sampling shall begin once sufficient flow is available during a storm season and only after the Workplan is reviewed and approved by the Los Angeles Water Board.

   c. **Sampling protocols**: Pollutants shall be analyzed using the analytical methods described in 40 CFR part 136. Laboratories analyzing samples shall be certified by the State Water Board, Division of Drinking Water (DDW) Environmental Laboratory Accreditation Program (ELAP) in accordance with Water Code 13176 and must include quality assurance/quality control (QA/QC) data in the report.

   d. **Pollutants to be monitored**: The Workplan shall, at a minimum, include monitoring for the following pollutants:

      i. Indicator Parameters: pH, total suspended solids (TSS), oil and grease, ammonia

      ii. Bacteria: enterococci

      iii. Metals: copper, lead, mercury, nickel, and zinc

iv. Organics: Polychlorinated biphenyls (PCBs)

2. Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practice Plan (BMPP)

The Discharger shall update its SWPPP/BMPP to reflect current site conditions, pollutant sources, monitoring requirements. The Discharger shall provide details on operational source control BMPs to be implemented at the Facility to reduce or prevent pollutants in stormwater discharges. The Discharger must also describe measures for evaluating the effectiveness of these BMPs and specify procedures for modifying or amending them as necessary to adequately address pollutants of concern. The SWPPP/BMPP shall be submitted to the Los Angeles Water Board within 90 days of the adoption date of this Order.

3. Reporting and Documentation

The Discharger shall submit interim updates after each qualifying storm event that results in a discharge and requires monitoring. Additionally, the Discharger shall submit an annual summary report to the Los Angeles Water Board by July 31st following the end of each storm season. The Discharger shall electronically submit the following:

a. Interim updates: Following each qualifying storm event, the Discharger shall provide interim updates on the status of monitoring activities. These updates may be submitted informally via email to the Los Angeles Water Board staff assigned to the Facility. Each update should include the sampling date, total rainfall during the event, and preliminary chemistry results of the monitoring data as soon as it is available.

b. Annual Summary Report Submittal: The Discharger shall arrange all reported data in a tabular format with each sample result, the applicable Reporting Level (RL), and the current Method Detection Limit (MDL), as determined by the procedure in 40 CFR part 136. The annual summary report shall also include, at a minimum, the following information:

i. A description of the sampling activities consistent with the procedures set forth in the approved Workplan.

ii. An analysis of the data trend for the season with a summary table of analytical results;

iii. A copy of the Chain of Custody;

iv. A copy of the field sampling log; and

v. A copy of laboratory analytical results with QA/QC data

c. Required Certifications: The Los Angeles Water Board, under the authority given by CWC section 13383, requires that each annual summary report should include a perjury statement in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision,

in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All documentation shall be submitted to the Los Angeles Water Board via email to losangeles@waterboards.ca.gov and randy.ly@waterboards.ca.gov.

The Executive Officer of the Los Angeles Water Board is authorized and directed to certify and submit copies of this Order to the Discharger, and to such individuals and governmental agencies as may have need therefore or may request the same.

I, Susana Arredondo, Executive Officer, do certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region on July 24, 2025.

SO ORDERED.

Susana Arredondo

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Date: 2025.08.08 16:30:42 -07'00'

Water Boards

Susana Arredondo
Executive Officer