
Los Angeles Regional Water Quality Control Board

July 1, 2016

Mr. William Probasco
Plant Manager
NRG California South LP
6635 South Edison Drive,
Oxnard, CA 93033

Dear Mr. Probasco:

CHANGE LETTER, WASTE DISCHARGE REQUIREMENTS (WDRs) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR NRG CALIFORNIA SOUTH, LP, ORMOND BEACH GENERATING STATION, OXNARD, CA. (NPDES NO. CA0001198, CI NO. 5619)

Pursuant to Division 7 of the California Water Code, the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) at a public hearing held on September 10, 2015, adopted Order No. R4-2015-0172.

Subsequent to the adoption of Order No. R4-2015-0172, the Regional Water Board identified a typographical error on Table E-8 of Attachment E (Monitoring and Reporting Program) of the Order requiring a minor modification that is consistent with Title 40 Code of Federal Regulations (C.F.R.) section 122.63(a). Table E-8 of the current Order requires the Discharger to monitor ammonia as nitrogen in the benthic sediments at Monitoring Locations BEN-001 through BEN-006, using "mg/L" (milligrams per liter) as the unit of measurement. However, as the requirement addresses sediment monitoring and the sampled media is in solid form (sediment), the unit of measurement "mg/kg" (milligrams per kilogram of sediment) is more appropriate. Therefore, Table E-8 is corrected to replace "mg/L" by "mg/kg" as the unit of measurement for ammonia as nitrogen at the benthic Monitoring Locations BEN-001 through BEN-006.

Pursuant to 40 C.F.R. section 122.63(a), this minor modification of the Order as listed above is allowed without following the procedures of 40 C.F.R. part 124. On June 24, 2016, the Discharger requested the Regional Water Board to make this minor modification. Regional Water Board staff determined the change is appropriate and therefore prepared the attached pages E-17, E-18, and E-19, which incorporate the correction explained above. These pages replace the corresponding pages in Order No. R4-2015-0172 that was adopted on September 10, 2015.

If you have any questions, please contact Ching To at (213)576-6696.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures

cc: **(Via Email Only)**

Mr. David Smith, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Ms. Robyn Stuber, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Ms. Becky Mitschele, Environmental Protection Agency, Region 9, Permits Branch(WTR-5)
NPDES Wastewater Unit, State Water Resources Control Board, Division of Water Quality
Mr. Kenneth Wong, U.S. Army Corps of Engineers
Ms. Crystal Marquez, U.S. Army Corps of Engineers
Mr. Bryant Chesney, NOAA, National Marine Fisheries Service
Mr. Jeff Phillips, Department of Interior, U.S. Fish and Wildlife Service
Ms. Sutida Bergquist, State Water Resources Control Board, Drinking Water Division
Mr. William Paznokas, California Department of Fish and Wildlife, Region 5
Ms. Teresa Henry, California Coastal Commission, South Coast Region
Mr. Tim Smith, Los Angeles County, Department of Public Works
Mr. Angelo Bellomo, Los Angeles County, Department of Public Health
Mr. Gerhardt Hubner, County of Ventura, Flood Control District
Ms. Vicki Musgrove, City of San Buenaventura
Ms. Elena Brokaw, City of San Buenaventura
Mr. Greg Nyhoff, City of Oxnard
Ms. Katherine Rubin, City of Los Angeles, Department of Water and Power
Mr. Al Wanger, California Coastal Commission, South Coast Region
Ms. Rita Kampalath, Heal the Bay
Ms. Rachel Stich, Los Angeles Waterkeeper
Ms. Johanna Dyer, Natural Resources Defense Council
Ms. Becky Hayat, Natural Resources Defense Council
Mr. Jason Weiner, Ventura Coastkeeper
Ventura Port District Harbor Patrol
Environment Now
Sierra Club
Ms. Mary Small, California Coastal Conservancy
Mr. Paul Jenkin, Surfrider Foundation, Ventura County Chapter
Ms. Jessica Altstatt, Santa Barbara Channel Keeper
Ms. Betsy Weber, Environmental Defense Center
Mr. Damon Wing, Ventura County
Mr. Daniel Cooper, Lawyers for Clean Water
Mr. William Probasco, NRG California South, LP

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NRG California South, LP
Ormond Beach Generating Station

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Ms. Julie Babcock, NRG California South, LP
Mr. George Piantka, NRG California South, LP
Mr. Scott Warnock, NRG California South, LP
Ms. Kristy Allen, TetraTech, Inc.
Mr. Jae Kim, Tetra Tech

NRG California South, LP.
Ormond Beach Generating Station
(NPDES CA0001198)

**CORRECTED MONITORING AND REPORTING PROGRAM
(MRP) PAGES**

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Salinity	ppt	Profile ³	2/Year ¹	2
Dissolved Oxygen	mg/L	Profile ³	2/Year ¹	2
pH	pH units	Profile ³	2/Year ¹	2
Temperature	°F	Profile ³	2/Year ¹	2
Visual Observations	--	Visual	2/Year ¹	4

1. Summer and winter during both flood and ebb tides.
2. 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 minimum levels (MLs) specified in Appendix II of the Ocean Plan (2012) that is required to demonstrate compliance. Where no methods are specified for a given pollutant, the methods must be approved by this Regional Water Board or the State Water Board.
3. Temperature shall be measured from surface to bottom at a minimum of one meter intervals at each station. Color, dissolved oxygen, light transmittance, pH, and salinity shall be measured at surface, mid-depth, and bottom at a minimum at each station.
4. The following general observations or measurements at the receiving water stations shall be reported:
 - Tidal stage and time of monitoring.
 - General water conditions.
 - Extent of visible turbidity or color patches.
 - Appearance of oil films or grease, or floatable material.
 - Depth at each station for each sampling period
 - Presence or absence of red tide.
 - Presence of marine life.
 - Presence and activity of the California least tern and the California brown pelican.

B. Benthic Sediments Monitoring at Monitoring Locations BEN-001 through BEN-006

1. The Discharger shall collect and analyze benthic samples once per year during the summer at Monitoring Locations BEN-001 through BEN-006 as follows:

Table E-8. Benthic Sediment Monitoring Requirements (BEN-001 through BEN-006)

Parameter	Units	Sample Type	Minimum Sampling Frequency
Benthic Infauna Community ²	--	0.1 square meter Van Veen grab	1/Year
Sediment Grain Size	Phi size	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Ammonia as Nitrogen	mg/kg	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Arsenic	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Beryllium	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Cadmium	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year

Parameter	Units	Sample Type	Minimum Sampling Frequency
Copper	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Chromium (III)	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Chromium, Total	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Lead	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Mercury	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Nickel	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Selenium	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Silver	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Thallium	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Zinc	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Acid Volatile Sulfides	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
PAHs ⁴	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Total PCB ⁵	µg/kg ¹	0.1 square meter Van Veen grab (upper 2 centimeters) ³	1/Year
Visual Observations ⁶	--	Visual	1/Year

1. Dry weight basis.

2. One sample shall be taken at each station for benthic infaunal community analysis. The entire contents of each sample shall be passed through a 1.0 millimeter screen to retrieve the benthic organisms. Sampling methods and protocols shall follow those described in the most current edition of the *Field Operations Manual for Marine Water Column, Benthic and Trawl Monitoring in Southern California*. All organisms contained within the sample shall be identified to the lowest possible taxon and counted. The resulting data shall be used to describe community structure at each station.

Procedures and test methods shall adhere to the following federal guidelines when applicable: Macroinvertebrate Field and Laboratory Methods for Evaluation the Biological Integrity of Surface Waters (1990) –EPA/600/4-90/030 (PB91-171363). This manual describes guidelines and standardized procedures for the use of macroinvertebrates in evaluating the biological integrity of surface waters.

Community analysis of benthic infauna shall include number of species, number of individuals per species, total numerical abundance per station, benthic response index (BRI) and biological indices, plus utilize appropriate regression analyses, parametric and nonparametric statistics, and multivariate techniques or other appropriate analytical techniques.

3. A separate grab sample shall be collected at each station whenever a biological sample is collected. Sub-samples (upper two centimeters) shall be taken from the grab for sediment chemistry analyses.

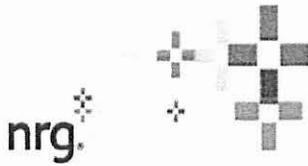
4. PAHs shall mean the sum of acenaphthylene, anthracene, 1,2-benzanthracene, 3,4 benzofluoranthene, benzo[k]fluoranthene, 1,12-benzoperylene, benzo[a]pyrene, chrysene, dibenzo[ah]anthracene, fluorene, indeno[1,2,3-cd]pyrene, phenanthrene, and pyrene.
5. Total PCB (polychlorinated biphenyls) shall mean the sum of chlorinated biphenyls whose analytical characteristics resemble those of Aroclor-1016, Aroclor-1221, Aroclor-1232, Aroclor-1242, Aroclor-1248, Aroclor-1254 and Aroclor-1260.
6. The following general observations or measurements at the benthic stations shall be reported:
 - Tidal stage and time of monitoring.
 - General water conditions.
 - Extent of visible turbidity or color patches.
 - Appearance of oil films or grease, or floatable material.
 - Depth at each station for each sampling period
 - Presence or absence of red tide.
 - Presence of marine life.
 - Presence and activity of the California least tern and the California brown pelican.

C. Bioaccumulation Monitoring at Monitoring Location MUS-001

1. Native California mussels (*Mytilus Californianus*) shall be collected during the summer from the discharge conduit, as close to the point of discharge as possible, for bioaccumulation monitoring. If mussels are unavailable near the discharge site, source mussels may be transplanted from nearby locations. Mussel tissue shall be analyzed for the parameters listed in the Table below.

Table E-9. Mussels Bioaccumulation Monitoring Requirements (MUS-001)

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Arsenic	µg/kg	Tissue	1/Year	1
Beryllium	µg/kg	Tissue	1/Year	1
Cadmium	µg/kg	Tissue	1/Year	1
Copper	µg/kg	Tissue	1/Year	1
Chromium (III)	µg/kg	Tissue	1/Year	1
Chromium, Total	µg/kg	Tissue	1/Year	1
Lead	µg/kg	Tissue	1/Year	1
Mercury	µg/kg	Tissue	1/Year	1
Nickel	µg/kg	Tissue	1/Year	1
Selenium	µg/kg	Tissue	1/Year	1
Silver	µg/kg	Tissue	1/Year	1
Thallium	µg/kg	Tissue	1/Year	1
Zinc	µg/kg	Tissue	1/Year	1
PAHs ²	µg/kg	Tissue	1/Year	1



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June 24, 2016

Ms. Ching-Yin To
California Regional Water Quality Control Board, Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

RE: Request for a Minor Permit Modification
Ormond Beach Generating Station
NPDES No. CA0001198, CI No. 5619

Dear Ms. To:

While reviewing the offshore monitoring requirements found in the Ormond Beach Generating Station NPDES Permit (No. CA0001198, CI 5619) a typographical error was discovered. We contacted you to share our finding and request Water Board clarification and direction. As a follow-up to our conversation, the Ormond Beach Generating Station is submitting this written request for a minor permit modification as instructed.

The typographical error involves the unit of measure required when reporting ammonia in benthic sediment. Section VIII. B. 1. Table E-8 located on page E-17 of the permit requires the reporting of ammonia as nitrogen using a mg/L unit measure. However, since the sampled media (benthic sediment) is a solid and not a liquid, we respectfully suggest that the correct unit of measure should be mg/kg and not mg/L.

We appreciate your assistance and look forward to receiving a modification to the permit from the Water Board to correct this typographical error.

Thank you very much, Ching. If there are any questions, please do not hesitate to contact me at (805) 276-1765 or by email at scott.warnock@nrg.com.

Respectfully,
NRG California South LP – Ormond Beach Generating Station

Scott Warnock
Environmental Specialist