

Aston, Rosario@Waterboards

From: empresslinen@aol.com
Sent: Tuesday, July 31, 2018 5:32 PM
To: Aston, Rosario@Waterboards
Cc: info@cineighbors.com
Subject: Mandalay Generating Station: NPDES CA0001180;CI 2093
Attachments: 0Xwater2018.pdf

Los Angeles Regional Water Board Commissioners
C/O Rosario Aston, LARWQB Staff Representative
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Attention: Madelyn Glickfeld, Chair
Lawrence Yee, Vice- Chair
Irma Munoz, Member
Charles Stringer, Member
Cynthia Guzman, Member

and: Cassandra D. Owens, LARWQB Chief, Industrial Permitting Unit

Regarding: Notice to Thomas DiCiolli, Plant Manager Dated June 28, 2018
Mandalay Generating Station Tentative Termination of WDRs etc., Oxnard CA
California South LP Mandalay
NPDES No. CA00001180 / CI No. 2093

Dear Honorable Commissioners:

We along with the greater community here in Ventura County, have recently experienced an extremely serious condition affecting the waters of the Channel Islands Harbor. We have gathered with community stakeholders, boaters, kayakers, swimmers, visitors, both within and without the boundaries of our neighborhood council in a mighty effort to bring to your attention a matter of grave concern.

One does not have to live on the water or be a "water person" to appreciate and value the beautiful clear and clean Channel Islands Harbor. This Harbor, which is the fifth largest recreational harbor in the State of California, has often been cited as the cleanest in the State. Sadly, the Harbor has recently suffered a devastating blow to its pristine condition. We regret to tell you that in your effort to accommodate the NRG Mandalay Generating Station early shut-down in accordance with the NPDES mandate for closure of water-cooled generating stations, this significant decision has had a dramatic negative effect on the Channel Islands Harbor waters and its aquaculture. We have substantive evidence that because of this shut-down, the circulation system that has existed in this Harbor from its construction completion in 1965,

has been completely physically impeded causing significant quantitative negative results to both the water and the marine life.

With due respect for your authority in this matter, we are, nonetheless, requesting with the strongest urgency that the Board immediately reverse its decision to allow suspension of the NRG NPDES permit and the acceptance of the shutdown of its circulation pumps prior to the legally-mandated shutdown date. We urge that the Board, concurrently, require NRG to reinstate the pumps operations or otherwise facilitate the outflow of the Edison Channel waters until such time that an alternate method of water circulation and flushing for the Channel Islands Harbor can be determined and implemented.

We believe that when you responded positively to NRG's request for approval of the early shutdown of its operation which, in simple terms, resulted in the cessation of the pumps that used the waters from the Channel Islands Harbor via the Edison Canal (aka Mandalay Canal), the Board was not fully informed of the ecological impact that this decision would have on the vibrant and healthy Channel Islands Harbor. It is our understanding that it was not clearly disclosed or explained to you in the NRG closure applications that the pumps captured and used the waters from what is, for all intents and purposes, the end loop of the entire Harbor's flushing system and that shutting down the pumps used by Mandalay would totally impeded the tidal outflow of the waters.

Further, the picture becomes more complex when you are made aware that this same canal appears to serve as the irrigation run-off for miles of farm fields, thus infusing chemicals and fertilizers into the water which as of now - and as a result of the canal blockade, are flowing directly back into the Harbor itself with no filtration of any kind.

Frankly, we believe NRG could easily have predicted the disastrous effects this shutdown would have on the entire Harbor and, consequently, had an obligation to disclose this situation in its application but refrained from doing so.

We thank you for the time you have taken to read our appeal and for your positive response to our request for immediate action.

Sincerely,
jack scapa.....4430 Gateshead Bay Oxnard CA 93035

Thank you,
Jack Scapa
Empress Linen Import Co.
818-784-9511 fax: 818-784-9523
Mail: P.O. Box 260786 Encino, CA 91426 USA
Office: 16400 Ventura Blvd., suite 331 Encino, Ca 91436 USA

July 31, 2018

Cassandra D. Owens/ Madelyn Glickfeld
Regional Water Quality Control Board
320 W. 4th St., suite 200
Los Angeles, CA 90013

Name Jack Scapa
Address 4430 GATESHEAD BAY
Phone 818-784-9511

EMAIL: EMPRESSLINE@AOL.COM

RE: PERMIT TERMINATION MANDALAY GENERATING STATION (NPDES NO. CA0001180, CI No. 2093)

Dear Water Quality Control Board Members,

The main reason that we purchased our home here in the Channel Island Harbor was its great water quality. Now we have very poor water quality since the closure of the NRG Mandalay Peaker plant on March 31, 2018. Not only did they stop the cooling pumps that provided circulation in our very long harbor, but for some reason the state had the Edison canal blocked on both the plant inlet and outlet, preventing any water circulation back to the ocean. Now we have sea life dying and the threat of massive sea life loss in future months.

A few key facts:

- CI Harbor used to be one of the cleanest harbors in the state due to the water flow through the Edison Canal, and now it's becoming one of the worst
- When the city and county agreed to develop Westport and Seabridge, they created an unusually long harbor, and it was understood that the water needed to be continually circulated to prevent major harbor deterioration, but nothing was done upon closure of the NRG power plant
- Our sea life is being threatened along with overall water quality due to very low oxygen levels
- We are at risk of a major catastrophe as occurred at King Harbor in Redondo Beach in 2011
- Property values will erode, and businesses may leave as the harbor stagnates, negatively impacting county and city revenues
- The city hired two marine biologists to assess the situation and their findings are alarming. The main culprit is algae bloom that results from several factors including rising water temperature and increased nutrients from nearby agriculture run off. But the closure of the plant and Edison Canal flow to the ocean by the plant is a key contributing factor.
- When NRG was directed to close the plant, there was no provision for an alternative path for the runoff that enters the canal north of Wooley Road where there are major agriculture fields. Now that runoff is running back into our harbor, adding more nutrients that contribute to algae growth, compounding the problem.
- The city is planning on installing 7 aerators at the back end of the harbor, but that will have negligible impact on our water quality and may actually result in great algae bloom.
- We believe that if the Edison Canal is reopened to allow circulation back to the ocean by the Mandalay plant, our harbor will be restored to its former clean state. More efficient pumps may be required to facilitate the circulation, but they will not need to run very often, as

evidenced by the fact that the plant only ran 120 days at 6-8 hours/day over the past few years and the circulation was sufficient. New pumps can also be solar-powered.

Oxnard and its harbor residents need your help to allow us to reopen the flow in the Edison Canal to help correct this current problem before it gets much worse.

Thank you for your consideration,

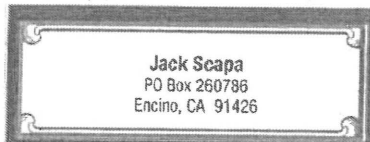
Name

Date:

Jack Scapa
7-31-2018

Name

MAIL ADDRESS



Phone 818 784 9511