

Los Angeles Regional Water Quality Control Board

August 30, 2018

Ms. Laura Oergel, Chair
Ventura County Chapter
Surfrider Foundation
P.O. Box 1028
Ventura, CA 93002
Info@surfrider.org

Dear Ms. Oergel:

RE: MANDALAY GENERATING STATION; NPDES CA0001180; CI 2093

On August 10, 2018, the Los Angeles Regional Water Quality Control Board (Regional Water Board) received your letter regarding the Tentative Order Terminating Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit for Mandalay Generating Station (MGS or Facility). Thank you for your consideration of the issues associated with the Tentative Termination of the Mandalay Generating Station permit and the relationship between the shutdown of MGS and changes in the water quality in the Channel Islands Harbor (CIH) and Edison Canal. Below we summarize your comments and provide our responses.

Comment 1: The decommissioning of the Mandalay power plant offers perhaps the most significant improvement to our coastline in decades. The removal of this industrial facility and associated NPDES permit will end the persistent harmful discharge into our coastal waters.

Response 1: We acknowledge and appreciate your support of the Board's proposed action to terminate the NPDES permit. In addition to the positive effects of eliminating OTC discharges, since there is no discharge of wastewater, including cooling water, from MGS, a permit is no longer required.

Comment 2: It is unfortunate that the reduction in circulation may be exacerbating a water quality problem in Channel Islands Harbor. The existing NPDES permit is outdated under current regulations, and should not be reinstated in order to transfer polluted water from one water body to another.

Response 2: Board staff concurs that pumping the ocean water from Edison Canal and discharging it to the ocean is not the best way to address water quality concerns in Channel Islands Harbor. Board staff agrees that identifying and controlling pollutants that may be causing water quality degradation is an appropriate way to address water quality concerns in CIH.

Comment 3: Surfrider believes that source control and better harbor management will offer great improvement to resolve an existing problem within the harbor. We have been in communication with the Channel Islands Neighborhood Council, and our correspondence is attached for your information.

Response 3: See our response above. Additionally, Board staff will continue to provide information and guidance, and facilitate discussions between the City, County of Ventura and community representatives to assess water quality in the CIH and to ensure that the beneficial uses are protected. Staff is in the process of reviewing available data to characterize the discharges entering the Edison Canal or the CIH if possible. Based on this data review and collection and evaluation of additional data and information by local agencies, the Board will use its programs as appropriate to assess and regulate the discharges that enter the CIH. As you note, controlling the pollutants entering these waterways will result in improvement in the water quality.

Thank you for your commitment to ensuring that the water quality in the Channel Islands Harbor and Edison Canal supports the beneficial uses. The Regional Water Board looks forward to input from the Ventura County Chapter of Surfrider Foundation as well as other stakeholders to preserve and protect this resource.

Sincerely,



Cris Morris, P.E.
Chief, Watershed Regulatory Section

cc: (via email only)

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