

November 6, 2019

Ms. Cassandra Owens  
Industrial Permitting Unit Chief  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

**Subject: Comments on Tentative NPDES Permit, Southern California Edison Company, Pebbly Beach Desalination Plant, CA0061191**

Dear Ms. Owens:

Southern California Edison (SCE) has reviewed the October 17, 2019 tentative draft NPDES Permit for Pebbly Beach Desalination Plant, and offers the following letter. Comments are provided in the body of the letter, while requests for clarification and administrative notes on the draft Permit are included in the Appendix. SCE has appreciated the opportunity to work with the Los Angeles Regional Water Board, and generally supports the updated permit draft. We have noted the reopener provisions based on submittal of the 13142.5(b) Determination Request summarized in the Order and confirm our intent to begin preparation of the Determination Request immediately upon adoption of this Permit. Comments are provided in the order that the content occurs in the Tentative Draft Permit.

***Comment 1: Order Section VI.C.2.b, page 14***

This section requires SCE to submit a compliance demonstration for the new RO Unit (Plant 2) configuration within 90 days of permit adoption.

1. SCE requests 180 days to prepare and submit this workplan. Significant coordination will be required to appropriately design this compliance demonstration with the PBDP operators. This additional time will be necessary to (1) ensure that this process is completed with the least amount of disturbance to the desalination plant and its production of fresh water permeate, and (2) ensure that the plant can switch between modes for the duration of the study, and at the time proposed for the study. Additionally, SCE will be preparing concurrent workplans as required by this Tentative Draft Permit, and the ability to stagger the due dates would ensure a better work product.
2. This section notes that Mode 0, Plant 1 only, is the normal operating mode. In fact, Plant 2 has been commissioned, and is the primary operating plant at this time, with Plant 1 on standby. This is termed Mode 2 in the Report of Waste Discharge, and is shown on page C-4 of the Tentative Draft Permit. SCE requests that this section be updated to note that Mode 2 is the normal operating mode.

**Comment 2: Monitoring and Reporting Program, page E-5**

- Temperature monitoring has increased from once per quarter to weekly monitoring. SCE has corrected the erroneous temperature report that was submitted via CIWQS, and requests that this be set back to quarterly monitoring.
- SCE requests that monitoring for fecal coliform be conducted weekly rather than five times per month. All other pathogen samples are collected weekly; allowing fecal coliform to be collected with the other samples ensures consistency and certainty in monitoring schedules. There were no fecal coliform exceedances during the previous permit term, so there should be no driver to increase the monitoring frequency. The requirement to collect five times per month, spaced equally, will result in scheduling challenges, will double the sampling effort, and will increase shipping costs because the samples cannot be collected concurrently with the weekly samples for other pathogens.

**Comment 3: Attachment E, Monitoring and Reporting Program, page E-19, 20**

Table E-6 requires salinity monitoring in the receiving water to be conducted weekly for the duration of the permit cycle. This facility will generally operate at a steady state, and SCE notes that the requirement to conduct weekly sampling in the receiving water will create significant cost without the benefit of gaining valuable data. SCE requests that this requirement be reduced to once every six months. Additionally, a similar data collection campaign will occur as part of SCE's preparation of the 13142.5(b) Determination Request and should not be duplicated through a permit requirement.

**Comment 4: Attachment F, Fact Sheet, page F-7**

Section II.B of the Fact Sheet provides a description of the facility. During development of the ROWD, SCE was asked to test the influent water from the seawells for plankton, to ensure that intake and mortality on the seawater supply side of the plant was not a concern. SCE conducted this analysis, and the lab report, dated October 22, 2018 states,

"No zooplankton or phytoplankton were detected in either sample. Subsurface-well intake water sampling indicates that entrainment of plankton is not predictably occurring at the subsurface well. Seawater is believed to be adequately filtered seawater through sediment and geological features of the seafloor to eliminate entrainment or impingement; no marine life mortality is expected at the sweater well intake."

This finding provides certainty that there is no mortality at the intake. SCE requests that the section discussing this process at the bottom of page F-7 be modified as follows:

"Recent testing of the two current seawells demonstrated that intake or mortality of all forms of marine life at the wells is minimal zero. The installation of two additional subsurface seawater intake wells will likely also result in even-less-potential zero potential for the intake or mortality of marine life."

**Comment 5: Attachment F, Fact Sheet, page F-11**

Fact Sheet Section II.F, Compliance Summary, notes that there was a temperature exceedance on 4/28/2017, with a reported value of 100.4 degrees F. SCE reviewed this report in CIWQS and also checked the original data collection sheet, and found that this value was reported erroneously. The correct value was 69 degrees F. Upon

review of the tentative draft permit, realized that this incorrect date point had been reported, and SCE requested the monitoring report be unsubmitted from CIWQS. The report has now been corrected, and will be resubmitted shortly.

***Comment 6: Attachment F, Fact Sheet, page F-13***

Section II.G.2 of the Fact Sheet notes that there are two options for creating a consistent supply of 1,100 gpm of seawater influent. Option 1 includes installing new wells to combine with the existing wells. This is dependent on the ability of the existing wells to be refurbished and improved. Option 2 includes abandoning the existing wells and drilling four or more new wells to create the necessary supply flow. The Draft Permit goes on to note that SCE may not proceed with Option 2 without concurrence from the Regional Board.

SCE proposes providing notification to the Regional Board if it determines that Option 1 is not feasible. Because the replacement of the existing wells will require approval from the Coastal Commission and LA County, and because drilling new wells will not have an impact on the effluent quality or the receiving water, SCE requests that the additional step of awaiting Regional Board approval be removed.

***Comment 7: Attachment F, Fact Sheet, page F-32***

Section IV.C.6.b of the Fact Sheet, Determination of Natural Background Salinity, notes that the natural background salinity established by SCE was modified by a standard deviation of 0.18 ppt. This has the effect of reducing the CA Ocean Plan allowance of 2.0 ppt above natural background salinity at 100m by 0.18 ppt, so that the effluent limitation is now  $2.0 - 0.18 = 1.82$  ppt above natural background salinity at 100m. SCE will provide further analysis in the 13142.5(b) determination request to demonstrate that the variability in natural background salinity in the Southern California Bight is extremely low, and that there should be no adjustment to the CA Ocean Plan limit of 2.0 ppt. SCE requests that a permit reopener be included following demonstration of the low variability in natural background salinity.

SCE requests the following reopener be included in Section VI.C.1: This Order may be reopened for modification of the current determination of natural background salinity, based on evidence to be provided with the 13142.5(b) Determination Request.

We appreciate the opportunity to comment on this Tentative Draft Permit and look forward to discussing our comments with you. Please do not hesitate to contact me at (310) 343-3876 or [Paul.Ahn@sce.com](mailto:Paul.Ahn@sce.com) if you have any questions.

Sincerely,



Paul Ahn, P.E.  
NPDES Program Manager  
Southern California Edison

## Appendix: Editorial Comments and Clarifications

### ***Comment 1: Attachment E, Monitoring and Reporting Program, page E-17***

Section 8.d on this page appears to have a copy and paste error, and the meaning of the paragraph has been distorted. Request that this paragraph be reviewed to ensure clarity.

### ***Comment 2: Attachment F, Fact Sheet, page F-4***

Section I.F of the Fact Sheet makes reference to a Time Schedule Order (TSO) that had originally been requested with the Report of Waste Discharge. Due to further research, that TSO was found to be unnecessary. SCE notes that keeping a reference to the TSO in the NPDES Permit may cause confusion, since there was no TSO issued concurrent with the NPDES Permit, and requests that this reference be removed.

### ***Comment 3: Attachment F, Fact Sheet, page F-6***

Section II.A.2 of the Fact Sheet references the commissioning of Plant 2 in the future tense. In fact, Plant 2 is currently operational, and the facility is running primarily in Mode 2 (Plant 2 only) due to its higher efficiency than Plant 1. SCE requests that Mode 2 be referenced as the current mode.

### ***Comment 4: Attachment F, Fact Sheet, page F-12***

Section II.G of the Fact Sheet notes that Pebbly Beach Desalination Plant is planning to install two new seawells to provide increased seawater intake capacity from 400 gpm to 1,100 gpm. In fact, while two new seawells is the goal, the production capacity of the new seawells is not guaranteed, and installation of more than two new seawells may be required to achieve the desired intake capacity. SCE suggests striking the word “two” in the description quoted above.

### ***Comment 5: Attachment F, Fact Sheet, page F-23***

Section IV.C.3.a of the Fact Sheet, Minimum Initial Dilution for Ocean Plan Table 1 Pollutants, notes in paragraph 3 that a dilution factor of 5:1 is used for all constituents. SCE requests that this be clarified as follows:

“The State Water Board and Regional Water Board, based on the data provided, concluded that a dilution factor of **five** (5:1) is applicable for this discharge for all constituents except salinity. See Section IV.C.6 for a discussion of the salinity effluent limitation calculation”