

**NRG CABRILLO POWER OPERATIONS INC.**

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January 10, 2005

Mr. John Phillips  
San Diego Regional Water Quality Control Board  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123-4340

**Subject: Cabrillo Power I LLC Response to Comments from Tetra Tech to San Diego Regional Water Quality Control Board on the Encina 316(b) Cooling Water Intake Effects Entrainment & Impingement Sampling Plan**

Dear Mr. Phillips:

Cabrillo Power I LLC (Cabrillo) appreciates the opportunity to respond to the comments from Tetra Tech on the *316(b) Cooling Water Intake Effects Entrainment and Impingement Sampling Plan* for the Encina Power Station (EPS) submitted to the San Diego Regional Water Quality Control Board (Regional Board) on September 2, 2004. Tenera Environmental prepared the plan for the EPS 316(b) studies, and Cabrillo had them respond to comments from Tetra Tech. The responses from Tenera are incorporated into this letter and identified accordingly.

The Tetra Tech comments generally call for further clarification of the study plan or additions to the plan that will not affect the sampling procedures currently being used. The Tetra Tech comments (numbered the same as on the Tetra Tech memo) with specific questions of Cabrillo have responses that are highlighted in boldface type. Tetra Tech also made several suggestions that we have responded to in the final section of this letter.

**TETRA TECH COMMENTS AND CABRILLO RESPONSES:**

- 1) *Page 2:* The authors state that they will use EPA's criteria for selecting appropriate target organisms for assessment, results from previous 316(b) studies, Aqua Hedionda Lagoon ecological surveys, and results from the upcoming study to "determine the appropriate target organisms that will be evaluated in detail." Final selection of target organisms should involve consultation with the appropriate resource agencies. Will the California Regional Water Quality Control Board (and others) be contacted to approve target organism selection before commencement of assessment analyses?

**Response: The final selection of the specific target organisms will be made in collaboration with the Regional Board and other appropriate agencies. The**

**sampling and processing is currently focused on fishes and selected macroinvertebrates; the same groups of organisms that were studied in San Diego Bay in 2001–2003 at the Duke Energy South Bay Power Plant in San Diego. The final list of target organisms will be based largely on their abundances in the entrainment and impingement samples. The impact assessment will be restricted to the most abundant taxa to ensure that there is have reasonable confidence in the results.**

- 3) *Page 7:* The MEC Analytical (1995) ecological surveys will be used to provide “data on fish populations in Aqua Hedionda Lagoon” (see page 24) for the evaluation of EPS impingement effects in relation to source water fishery resources. The authors mention that the MEC Analytical sampling “did not include any areas of the rocky revetment lining the Outer Lagoon that would increase the abundance and number of species collected.” It appears that the surveys focused on the Middle and Inner Lagoons. Since the MEC Analytical data will be used for impingement effects analyses, the search for and/or collection of supplemental information for Outer Lagoon fishes may be warranted (however, it should be noted that we have not reviewed the contents of the MEC Analytical report).

***Response:* The MEC study utilized multiple gear types that effectively sampled most of the habitats in Aqua Hedionda Lagoon. Cabrillo is currently evaluating if supplemental studies of the habitats not sampled in the MEC study are necessary and will propose those to the Regional Board if warranted. These habitats include the shallow mudflats areas that are common in the middle and inner lagoon, the rocky habitat that lines the boundary of the outer lagoon, and the artificial substrates on the piers, docks and floats of the outer lagoon. Gobies that occur in burrows on the mudflats and combtooth blennies, garibaldi and rockfishes that occur on the rocky habitat and artificial substrates in the outer lagoon were not effectively sampled by any of the gear types used in the MEC study. The larvae from these fishes will likely be abundant in the entrainment samples and this study will provide an estimate of their adult source water populations that will be used in the assessment of cooling water intake system (CWIS) effects.**

- 6) *Page 11:* The authors state that entrainment sampling began in June 2004 and will continue through May 2005. Has this proposed index period changed, or was approval received for sampling commencement prior to the preparation and review of this sampling plan (Plan is dated September 2004)? Did source water sampling also begin before this plan was written?

***Response:*** Both entrainment and source water sampling began in June 2004. The sampling started before a sampling plan was submitted to the Regional Board to take advantage of studies of the cooling water system that were being conducted in association with the permitting for the desalination facility being proposed for construction at the plant site by Poseidon Resources. The original proposal for the Poseidon study did not include the more extensive source water sampling in the final study plan. The scope of the study was expanded to conform to other 316(b) demonstration studies Tenera has completed in California including the study recently completed at the Duke Energy South Bay Power Plant in San Diego Bay. This provided Cabrillo the opportunity to continue the sampling in response to EPA's recently published Phase II rule for compliance with Section 316(b) of the Clean Water Act.

- 7) *Page 11:* Entrainment samples will be collected from the lagoon, near the intake structure. Is entrainment sampling not possible from a location within the EPS CWIS?

***Response:*** Entrainment sampling conducted at ocean and estuarine power plants over the last ten years in California has been done in the source waters as near as possible to the intakes. This sampling location has been used because studies at the Diablo Canyon Power Plant in central California showed that large losses of planktonic organisms such as larval fishes can occur as a result of filtering by biofouling organisms that grow on the surfaces inside the power plant cooling water intake system. Studies have shown reductions in densities of greater than 90 percent between intake and discharge samples that have been attributed to biofouling losses. Although the entrainment sampling proposed for the EPS with plankton nets in the source waters at the power plant intake structure requires the assumption that the densities of organisms in the source waters are representative of the densities of organisms that are entrained, sampling inside the power plant introduces additional assumptions, sampling problems, and the known problem of cropping by biofouling organisms. One of these problems involves obtaining representative, well-mixed samples and sampling in rapidly flowing water. In addition, sampling inside the plant cooling water system usually requires pump sampling methods that are different than the towed net sampling used in the source waters, therefore introducing additional assumptions affecting comparisons between density estimates. All of these issues have resulted in the recommendation that entrainment sampling be done in the lagoon using nets towed as close as practical to the intake structure.

- 8) *Page 11:* As part of the description of entrainment sampling methods, the authors mention that the “accuracy of individual instruments differed by less than 5% between calibrations.” This is mentioned as a statement. Is it intended to be a quality standard?

***Response:*** No, it is not intended as a quality standard, it is just a statement that the difference in rotor constants between calibrations was generally less than 5%. In addition to maintaining the flowmeters before and after each survey, they are calibrated every three months to recalculate a new rotor constant, which is used to calculate the flow of water through the net. If the value of a constant changes greater than 10% between calibrations, which is almost never the case, the readings from the field data sheets are reviewed to determine when the change occurred. If the change in the flowmeter can be detected from the data, the values will be adjusted using the average difference between the two flowmeters used on the bongo frame prior to that sample; otherwise the flowmeter reading for the instrument that is within the 10% calibration range will be used to estimate the volume of seawater filtered through both nets on the bongo frame.

- 9) *Page 11:* The authors state that if the target volume of water is not filtered during the entrainment tow, the tow will be repeated until the targeted volume is reached. Will the tow distance be extended to accomplish this, or will the tow truly be “repeated?”

***Response:*** The tow will be continued at the lagoon and entrainment stations by extending the tow, covering the vertical depth of the water column until the target volume is collected. Some of the deeper nearshore samples cannot simply be extended because it would not be possible to collect an unbiased sample that extended across all depths without greatly increasing the sample volume. In these cases, or if flowmeters are fouled with kelp, the samples are discarded and the sampling is repeated at the station.

- 10) *Page 12:* The source water sampling methods are said to be “identical to the entrainment sample collection” (with a few noted exceptions). Does that mean that all source water stations will be sampled concurrently with entrainment sampling, and during the same (four) six-hour cycles? Is the source water sampling index period the same as the June 2004-May 2005 entrainment period?

***Response:*** Yes, all of the stations, source water and entrainment, are sampled during the same four six-hour blocks on the day the survey is conducted. All of the stations are usually sampled within a 2-3 hour period. All of the

**stations have been sampled since June 2004 with a total of eight surveys collected as of December 2004.**

- 11) *Page 13:* The Inner Lagoon will be sampled with a single pushnet. Will the targeted volume of water be the same as the paired net (oblique) samples taken in the Outer Lagoon and nearshore ocean areas?

***Response:* Yes. The targeted volume for the lagoon source water and entrainment samples is approximately 50 m<sup>3</sup>. The volumes for samples from the nearshore stations may be greater, especially at the deepest stations, N4 and N5, where the minimum sample volume may exceed 50 m<sup>3</sup> because the nets are lowered through the entire water column and then retrieved.**

- 13) *Page 13:* The authors mention that “the number of source water stations will be evaluated as data become available to determine if fewer stations can be sampled.” More information may be warranted to explain this process, and in particular, to explain whether reviewing agencies will be included in the decision process.

***Response:* A proposal for this or any other change in the sampling program would first be submitted to the Regional Board for review. Any changes would only be implemented after review and approval by Regional Board and other reviewing agencies.**

- 14) *Page 14:* The authors state that, “A laboratory quality control (QC) program...will be applied to all samples.” Is this a printed and approved QA/QC plan? If so, it should be cited. If not, what are the specific data quality objectives for laboratory processing (e.g., sorting efficiencies, taxonomic agreement, etc.)?

***Response:* The laboratory QC program is an internal Tenera document that was not cited in the study plan. The QC program includes a procedure for preserving, transferring, splitting, and sorting plankton samples. There is a separate procedure for identification of the organisms from the samples. The following data quality objectives are used for sorting:**

- 1. The first ten samples that are sorted by an individual are completely resorted by a designated QC sorter. A sorter is allowed to miss one target organism when the original sorted count is 1-19. For original counts above 20 a sorter must maintain a sorting accuracy of 90%.**
- 2. After the sorter has passed 10 consecutive sorts, the program is switched to a ‘1 sample in 10’ QC program for that sorter. After the sorter has**

completed another 10 samples, one sample is randomly selected by the designated QC sorter for a QC resort.

3. If the sorter maintains the 90% accuracy sorting rate for this sample, then the sorter continues in the '1 sample in 10' QC mode.
4. If a sample does not meet the 90% accuracy rate their subsequent samples will be resorted until 10 consecutive samples meet the criteria.

A similar QC procedure is used for taxonomic identification except that the taxonomist must maintain an accuracy level of 95% for the identifications.

- 16) *Page 15:* The FH model requires specific input parameter data (e.g., age-specific mortality) that may not be readily available. The authors state that, "...this degree of information is rarely available for a population." They also mention that "...our assessment will employ any available, scientifically acceptable sources of information on fisheries stock or population estimates of unexploited species entrained by the EPS." Will adequate input parameter data be available, or is it too early in the process to tell?

***Response:*** The initial review of the data showed that many of the same fish taxa that were analyzed from other studies were also abundant in the EPS samples. Also, similar to other studies, the majority of the fishes were small, forage species that do not have direct commercial/recreational fishery values. Therefore, while it has been possible to parameterize the adult equivalent models (FH and AEL) for many of these species in past studies, estimates of their adult populations that were necessary to interpret the results of the modeling efforts were usually not available. The MEC study on the fishes of Aqua Hedionda Lagoon and results from supplemental studies on adult fishes will help provide some of this information.

- 19) *Page 19:* The impingement study methods do not mention an index period. Has impingement sampling begun, and will the sampling period coincide with entrainment sampling (June 2004-May 2005)?

***Response:*** Yes, impingement sampling began in early July 2004 and will continue through June 2005. Although it does not exactly coincide with entrainment sampling, it is close enough to capture the same seasonal changes in fish and target invertebrate abundance that will be present in the entrainment sampling. The sampling was started in July to take advantage of studies at the plant being conducted in association with the permitting for the desalination facility being proposed for construction at the plant site by Poseidon Resources (See *Tenera Response to Comment 6*).

- 20) *Page 20:* The authors mention a quality control (QC) program for impingement sampling. Is this a printed and approved QA/QC plan? If so, it should be cited. If not, what are the “random cycles for re-sorting” and the specific quality objectives (e.g., for sorting efficiency)?

***Response:*** Tenera has written procedures for conducting the impingement sampling at EPS that all participating samplers are required to follow. A quality control plan is part of this procedure. Each impingement sampling team is comprised of two qualified biologists familiar with the fish and invertebrate fauna likely to be impinged. The goal of the sampling is to correctly identify, and accurately count and weigh all impinged organisms according to the criteria in the sampling protocol. In addition to ongoing quality control checks by samplers (e.g., consultations among team members, supervisor involvement, preservation of specimens of uncertain identity), Tenera personnel will check the counts and identifications from two cycles of impinged material on a quarterly basis. Unlike the laboratory identification process where a 90% sorting accuracy objective is specified, a specific quantitative objective for the impingement QC program is not feasible because of the variability in the quantity and types of impinged material. The objective is 100% accuracy. Tenera will document the results of the QC checks and implement any corrective actions necessary to ensure compliance with the written procedures.

- 21) *Page 22:* The authors state that, “Although we have proposed to sample normal impingement weekly, we will evaluate the potential to reduce the sampling frequency to once every two weeks.” More information may be warranted to explain this process, and in particular, to explain whether reviewing agencies will be included in the decision process.

***Response:*** See response to Comment 13.

- 22) *Page 23:* The authors state that, “Fishery management practices and other forms of stock assessments will provide the context required to interpret [the estimate of the annual probability of mortality due to entrainment].” The data types mentioned may not be available for some of the most frequently entrained fishes (e.g., non-commercial /non-recreational species). Will adequate evaluation data be available, or is it too early in the process to tell?

***Response:*** See response to Comment #16. The MEC study on the fishes of Agua Hedionda Lagoon will help provide this information for the small,

**estuarine, forage species that are not targeted by commercial or recreational fisheries.**

- 23) *Page 23 and 24:* Potential target organisms are mentioned. Comment 1 (above) applies here. Will the California Regional Water Quality Control Board (and others) be contacted to approve target organism selection before commencement of assessment analyses?

***Response:* See response to Comment 1.**

## SUGGESTIONS

- The governing regulatory/resource agencies should be given the opportunity to consider and approve/reject: the selection process for representative species (mentioned in comments 1 and 23, above); the possible reduction in the number of source water sampling stations (comment 13); and the possible reduced impingement sampling frequency.

***Response:* See responses to comments 1, 13, and 23. Proposals for these, or any other, change to the sampling program would first be submitted to the Regional Board for review. Any changes would only be implemented after review and approval by the Regional Board.**

- The temporal aspects of the study questioned in comments 6, 10 and 19 (above) need to be explained in more detail.

***Response:* See responses to Comments 6 and 19.**

- The quality control program needs to be described in more detail (see comments 14 and 20), or the QA/QC plan should be cited and/or attached as an appendix.

***Response:* Procedures for the sampling and laboratory processing will be submitted as attachments to the study plan.**

- As mentioned previously, the study plan was obviously developed by qualified and experienced contractors, and we think that their study design is conceptually valid. Most comments listed above represent the need for relatively minor clarifications or additions.

Thank you again for the opportunity to respond to the comments from Tetra Tech. The study being conducted by Tenera Environmental is based on the design used for the entrainment and impingement studies at the Duke Energy South Bay Power Plant in San

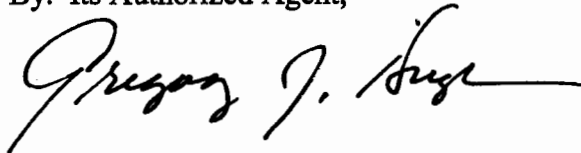


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Diego Bay. These studies were required for the plant's NPDES permit that was recently approved by the Regional Board. Therefore, we are confident that the study will provide the information necessary for Cabrillo Power I LLC to comply with EPA's recently published Phase II rule for Section 316(b) of the Clean Water Act. We look forward to working with you and the other Regional Board staff on this project and would be available to discuss our responses to these comments at your convenience.

If you have any questions or comments, please contact Mr. Tim Hemig at (760) 268-4037.

Sincerely,  
Cabrillo Power I LLC  
By: Its Authorized Agent,

A handwritten signature in black ink, appearing to read "Gregory J. Hughes", with a long horizontal flourish extending to the right.

By: NRG Cabrillo Power Operations Inc.  
Gregory J. Hughes  
Regional Plant Manager

cc: Tim Hemig (Cabrillo)  
Sheila Henika (Cabrillo)  
John Steinbeck (Tenera)  
Pedro Lopez (Cabrillo)  
Hashim Navrozali (Regional Board)