California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.waterboards.ca.gov/losangeles

Arnold Schwarzenegger
Governor

October 4, 2006

Ms. Susan Damron
City of Los Angeles Department of Water and Power
111 N. Hope Street, Room 1213
Los Angeles, California 90012

Dear Ms. Damron:

LOS ANGELES DEPARTMENT OF WATER AND POWER, SCATTERGOOD GENERATING STATION, LOS ANGELES, CA. (NPDES NO. CA0000370, CI NO. 1886) – REVIEW OF SCATTERGOOD GENERATING STATION, STUDY PLAN FOR TESTING THE EFFECTIVENESS OF THE INTAKE STRUCTURE VELOCITY CAP

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff have reviewed the *Scattergood Generating Station Study Plan for Testing the Effectiveness of the Intake Structure Velocity Cap,* prepared for The City of Los Angeles Department of Water and Power (LADWP) by Tenera Environmental, Inc., MBC Applied Environmental Sciences, and URS Corporation. This study plan was submitted as Appendix E of the previously submitted *Clean Water Act Section 316 (b) Proposal for Information Collection (PIC) for Scattergood Generating Station.* This Study Plan was designed to evaluate the effectiveness of the existing velocity cap at reducing impingement and was prepared in response to comments received by the LADWP on the PIC submitted in 2005.

Overall, this study plan is adequate to evaluate the efficiency of the existing velocity cap in reducing impingement at this facility. However, our review has identified two concerns with the Study Plan as presented.

COMMENT #1 – SAMPLING FREQUENCY. The supplemental velocity cap studies will be conducted during the same time period as weekly impingement surveys, but slightly different methods will be used to collect the samples. In the weekly impingement surveys, the traveling screens will be held stationary for intervals of approximately 6 hours, which allows them to collect fish and shellfish before rotating them and collecting the impingement sample. This protocol will result in four six-hour impingement samples collected over a 24-hour period. By contrast, the velocity cap samples will be collected by holding the traveling screens stationary for 24-hours before collecting the impingement samples. Such a protocol will prevent quantification of diel variation (which is required to be quantified in the Impingement Mortality and Entrainment [IM&E] Surveys) and likely degrade the quality of specimens collected for identification. Further, this difference in sampling methods may make it more difficult to directly

compare impingement rates measured under the two different sampling protocols. No rationale is provided for why impingement samples for the velocity cap study are to be collected in a different manner than those for the IM&E studies.

RECOMMENDATION #1. Given that these studies are to be conducted during the same time period and are measuring the same endpoint (i.e., impingement), and unless there are other logistical obstacles, the velocity cap study impingement samples should compare directly to those collected under the IM&E surveys.

COMMENT #2 – SPATIAL VARIATIONS. The intake tunnel (with the velocity cap) and the discharge tunnel (reverse intake) are at different distances from the shoreline and different water depths at the point of water intake. The Discharger did not consider associated variations in fish and shellfish species and variations in population densities. The statistical analysis proposed by the Discharger did not include a correction for this variation or any extrapolation based on IM&E data to be collected.

RECOMMENDATION #2. The data analysis should consider spatial variations between the normal intake and the reverse intake points and associated variations in fish and shellfish species and variations in population densities. The Discharger should include a correction for these variations that is based on the IM&E data to be collected.

If you have any questions, please contact Dr. Tony Rizk at (213) 576-6756.

Sincerely,

Jonathan S. Bishop
Executive Officer

MAILING LIST

U. S. Environmental Protection Agency, Region 9, Permit Branch (WTR-5)
Ms. Nancy Yoshikawa, U. S. Environmental Protection Agency, Region 9
Ms. Robyn Stuber, U. S. Environmental Protection Agency, Region 9
U.S. Army Corps of Engineers
Mr. Bob Hoffman, NOAA National Marine Fisheries Service
Department of Interior, U. S. Fish and Wildlife Service
Mr. Philip Isorena, State Water Resources Control Board, Division of Water Quality
Mr. Dominic Gregorio, State Water Resources Control Board, Division of Water Quality
Mr. Marc S. Pryor, California Energy Commission
Mr. Rick York, California Energy Commission
Mr. Tom Luster, California Coastal Commission
Mr. William Paznokas, California Department of Fish & Game, Region 5
Mr. Thomas Napoli, California Department of Fish & Game
Mr. Guangyu Wang, Santa Monica Bay Restoration Commission
Department of Health Services, Sanitary Engineering Section
California State Parks and Recreation
South Coast Air Quality Management District
Water Replenishment District of Southern California
Los Angeles County, Department of Public Works, Waste Management Division
Los Angeles County, Department of Health Services
Ms. Heather L. Hoecherl, Heal the Bay
Dr. Mark Gold, Heal the Bay
Mr. Dana Palmer, Santa Monica Baykeeper
Mr. David Beckman, Natural Resources Defense Council
Mr. Daniel Cooper, Lawyers for Clean Water
Environment Now
Mr. Tim Hemig, El Segundo Power LLC
Mr. Steve Maghy, AES Southland LLC
Ms. Julie Babcock, Reliant Energy
Mr. Tim Havey, TetraTech
Mr. Shane Beck, MBC Applied Environmental Sciences
Mr. Scott Seipel, Shaw Environmental & Infrastructure, Inc.
Mr. John Steinbeck, Tenera Environmental