

SAN DIEGO WATER BOARD RESPONSES TO COMMENTS  
TENTATIVE ORDER NO R9-2012-0015, SAN DIEGO GAS AND ELECTRIC

**A. Comments from the City of Escondido by letter dated July 24, 2012**

1. The City of Escondido (City) has requested the phrase “except for enforcement purposes” be removed from the first paragraph on page 10. The liability of any enforcement procedure should be assigned, directed and addressed by the new discharger (San Diego Gas and Electric).

**RESPONSE TO A.1.** No change to the Tentative Order is warranted. The statement of “except for” is included to make clear that the San Diego Water Board is not prohibited from taking enforcement action for violations of Order No. R9-2005-0139 that occurred while that Order was in effect.

2. The City believes Table A of the Ocean Plan should be included in the Tentative Order. Effluent from the brine line blends with the Hale Avenue Resource Recovery Facility (HARRF) secondary effluent and ultimately is discharged to the Pacific Ocean. In addition, SDG&E has had previous violations of their discharge permit. Violations include total suspended solids exceedances.

**RESPONSE TO A.2.** No change to the Tentative Order is warranted. The California Ocean Plan specifies that the technology-based Table A effluent limitations apply to publicly owned treatment works and industrial discharges for which Effluent Limitation Guidelines (ELGs) have not been established pursuant to sections 301, 302, 304, or 306 of the Federal Clean Water Act. The discharge from the Palomar Energy Center (PEC) is subject to technology-based ELG New Source Performance Standards for the steam electric power generating point source category specified in 40 CFR 423.15. Accordingly the Ocean Plan Table A effluent limitations do not apply to the PEC discharge.

The ELG New Source Performance Standards do not establish a total suspended solids (TSS) effluent limitation for boiler blowdown for inclusion in the Tentative Order. Some concentration of TSS will occur in the cooling tower blowdown due to evaporation and, in some cases, contact with airborne particulates. San Diego Gas and Electric has made changes to PEC operations to minimize the accumulation of solids in the cooling tower basin that would result in excess TSS being discharged. By keeping the TSS suspended and then periodically releasing a portion of the circulating water (as blowdown), the concentrations of TSS remain consistent. In addition, the cooling tower basin is cleared of any solids that have settled in the basin every other year during a plant maintenance outage. Monitoring requirements for TSS have been included in the Tentative Order to ensure that the system is properly maintained and operated.

3. Effluent limitations for Total Residual Chlorine should be changed from Instantaneous Minimum to Maximum Daily

**RESPONSE TO A.3.** The Tentative Order has been corrected as noted by the City. See Errata Sheet, Item Nos. 2 and 8.

4. The City recommends that section IV Discharge Specifications A.1 through 10 from Order No. R9-2005-0139 be included in the Tentative Order to protect the indigenous marine life of the Pacific Ocean

**RESPONSE TO A.4.** No change to the Tentative Order is warranted. In reviewing the requirements of Order No. R9-2005-0139, it is clear that the intent of the Discharge Specifications requested by the City are adequately addressed by the Receiving Water Limitations specified in Section V of the Tentative Order. In addition, inclusion of the above mentioned parameters as receiving water limitations, rather than discharge specifications, is consistent with the requirements contained in the City of Escondido's and San Elijo Joint Power Authority's NPDES permits for their individual discharges through the San Elijo Ocean Outfall.

5. The City requests the following changes in section VI.C of the Tentative Order:
  - a. Best Management Practices and Pollution Prevention should still be applicable
  - b. A special provision should be added to require a Spill Prevention, Response Plan, and Spill Reporting Requirements for the Palomar Energy Center
  - c. A special provision should be added to require a Water Treatment System and Cooling Tower Additives Audit
  - d. A special provision should be added that requires SDG&E to notify the San Diego Water Board and the City in writing of any change of any chemical or any additional chemical use in the water treatment system and cooling tower operation at their facility for approval of the San Diego Water Board and the City prior to use to prevent the potential of priority pollutants entering the discharge and avoid possible violations.

**RESPONSE TO A.5.**

- a. No change to the Tentative Order is warranted. The Facility is currently enrolled under the Statewide Industrial Storm Water Permit (WQ Order No. 97-03-DWQ) which requires the development and implementation of a storm water pollution prevention plan (SWPPP). The SWPPP has 2 major objectives:

(1) Identify and evaluate sources of pollutants associated with industrial

activities that may affect the quality of storm water discharges and authorized non-storm water discharges from the facility; and

(2) Identify and implement site-specific best management practices (BMPs) to reduce or prevent pollutants associated with industrial activities in storm water discharges and authorized non-storm water discharges. BMPs are generally categorized as either non-structural BMPs (good housekeeping, preventive maintenance, spill response, material handling and storage, record keeping and internal reporting) or structural BMP's (overhead coverage, retention ponds, control devices, secondary containment structures, treatment).

In addition, the Municipal Storm Water Permit for San Diego County (Order No. R9-2007-0001, NPDES No. CAS0108758) requires each Copermittee (in this case the City of Escondido) to prohibit the discharge of spills, dumping, or disposal of materials other than storm water to its MS4. Order No. R9-2007-001 also requires each Copermittee to implement an industrial and commercial program to reduce industrial and commercial discharges of pollutants from the MS4 to the maximum extent practicable and prevent industrial and commercial discharges from the MS4 from causing or contributing to a violation of water quality standards (this includes the development of BMPs). Inclusion of BMP and pollution prevention requirements in the Tentative Order are unnecessary and would be duplicative of the requirements already in place in the Statewide Industrial Storm Water Permit and the San Diego County Municipal Storm Water Permit.

- b.** See response a. above.
- c.** No change to the Tentative Order is warranted. The requirement for a Water Treatment System and Cooling Tower Additives Audit has been included in the Monitoring and Reporting Program (MRP). All requirements in the MRP are enforceable under the Special Provisions section of the Tentative Order.
- d.** No change to the Tentative Order is warranted. The Tentative Order requires the Discharger to maintain a log of all chemical additives added to the water treatment systems and cooling tower that are eventually discharged from the power generating facilities to the IBCS and report these chemical additives to the San Diego Water Board. The requirement to record and report chemical use in the cooling water is necessary to comply with the USEPA effluent limitation guidelines for the Steam Electric Power Generating Point Source Category at 40 CFR 423 which require the concentration of priority pollutants discharged in cooling tower blowdown be non-detectable. By recording and reporting the chemicals used in the cooling water, both the Discharger and San Diego Water

Board can determine which priority pollutants the Discharger should be monitoring to ensure priority pollutants are not present in the cooling water blowdown in detectable amounts.

The City can access and review the San Diego Gas and Electric chemical additives log and 24-hour notification report of chemical additions for cooling tower maintenance at the San Diego Water Board Office.

6. The City recommends the following changes on Page E-3, Table E-2 Effluent Monitoring at EFF-001:
  - a. Unit for Total Suspended Solids should change from ug/l to mg/l.
  - b. Minimum Sampling Frequency for Total Chlorine Residual, Total Suspended Solids and pH should change to Weekly.

#### **RESPONSE TO A.6**

- a. The Tentative Order has been corrected as requested by the City. See Errata Sheet Item No. 4.
- b. The Tentative Order has been revised to change the sampling frequency for total residual chlorine as requested by the City. Weekly monitoring will ensure an adequate number of data points are available to determine compliance with the 6-month median effluent limitation. See Errata Sheet Item No. 4.

The Tentative Order has been revised to change the sampling frequency for TSS from semiannual to monthly. Based on review of existing data, monthly monitoring of TSS is adequate to detect variations in TSS concentrations. See Errata Sheet Item No. 4.

No change is warranted to the sampling frequency for pH. Sampling frequency for pH in cooling tower blowdown is consistent with the existing requirements in Order No. R9-2005-0139.

#### **B. Comments from San Diego Gas and Electric (SDG&E) received via email on July 27, 2012**

1. SDG&E requested the following findings be added to the Tentative Order:
  - Only the effluent limits and monitoring requirements applicable to Palomar's internal discharges to the City of Escondido's Industrial Brine Collection System (IBCS) will be enforceable against SDG&E.
  - Palomar's internal discharges to the IBCS will no longer be subject to the Industrial User Discharge Permit issued by the City or to enforcement by

the City once SDG&E is named as a discharger under the NPDES permit.

- SDG&E has not violated, and the San Diego Water Board does not intend to assert that SDG&E has violated, the federal Clean Water Act or the California Water Code by operating consistent with its original permitting before issuance of the NPDES permit naming SDG&E as a discharger.

**RESPONSE TO 1B.** No change to the Tentative Order is warranted. The suggested findings do not provide any additional data or supporting information for the requirements of the Tentative Order. This information will be retained in the file as part of the record for adoption of the Tentative Order.

2. Tables 7 and 9 of the draft Order specify the effluent limits and performance goals respectively for cooling tower blowdown. The mass-based effluent limits and performance goals (lb/day) for pollutants in the Tables are based on a 30-day average flow of 1.1 MGD. Order R9-2005-0139 used the maximum flow rate of 1.4 MGD to set the lb/day limits. We would request that the Regional Board continue to use 1.4 MGD in calculating the lb/day values (and remove the 1.1 MGD basis). Using mass-based limits that are based on the 30-day average flow value could potentially restrict the plant from running on full capacity (in some instances) and sets a de facto limit of 1.1 MGD. Since Palomar is a Reliability-Must-Run (RMR) plant, we would like to ensure that its daily power generation output is not impacted. We feel that the pollutant concentration limits and lb/day limits (based on 1.4 MGD) should be sufficient in demonstrating compliance with the subject water quality objectives and/or technological effluent standards.

**RESPONSE TO 2B.** The Tentative Order has been revised to include a condition establishing alternative permit mass loading limitations in accordance with 40 CFR 122.45(b)(2)(ii) based upon the periodic anticipated increase in energy output production.

Pursuant to 40 CFR 122.45(b)(2)(i) mass-based limitations must be based upon a reasonable measure of actual production of the facility rather than upon the design production capacity. Mass-based limitations for the cooling tower blowdown have been established based on the highest reported monthly average flow, between January 2008 and September 2011, of 1.09 MGD. For the purposes of calculating mass-based limitations the highest observed flow was rounded up to 1.1 MGD.

See Errata Sheet Item Nos. 2, 6, and 7.

3. The Maximum Daily concentration and mass-based effluent limits for total chlorine residual in Tables 7 and F-11 have been inserted in the wrong column (i.e. under the "Instantaneous Minimum" column). These limits need

to be moved to the “Maximum Daily” column in the Tables.

**RESPONSE TO 3B.** The Tentative Order has been revised. See Errata Sheet Item Nos. 2 and 8.