

Mata, Michelle@Waterboards

From: Hashim Navrozali <HNavrozali@semprautilities.com>
Sent: Friday, July 27, 2012 2:31 PM
To: Mata, Michelle@Waterboards; rb9agenda, rb9agenda@Waterboards
Subject: Agenda Item: SDG&E's Comments on Tentative Order No. R9-2012-0015 (Palomar Energy Center)

Importance: High

San Diego Gas & Electric (SDG&E) has the following comments regarding Tentative Order No. R9-2012-0015 (NPDES Permit and Waste Discharge Requirements for the Palomar Energy Center):

1. As SDG&E has previously discussed with the Regional Board, SDG&E understands that the following circumstances will apply once SDG&E is named as a discharger under the NPDES permit:

- a. 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;
- b. 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; and
- c. 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.

SDG&E requests that the above Findings be inserted into the 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 ave 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.
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.

Thanks

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September 12, 2012
Agenda Item No. 6
Supporting Document No. 4