

From: Lara_Julio@Waterboards
To: [Scott Maloni](mailto:Scott_Maloni)
Cc: Smythe_Hope@Waterboards; Joy_Jayne@Waterboards; [Josie McKinley](mailto:Josie_McKinley); Gaslan_Milasol@Waterboards; Smythe_Mark@Waterboards; Smythe_Hope@Waterboards; Joy_Jayne@Waterboards; Reeder_Terri@Waterboards; Willis_Lauma@Waterboards; Sablan_Teresita@Waterboards; Waggoner_Claire@Waterboards; Luster_Tom@Coastal; Ellis_Daniel@Waterboards
Subject: Re: Copper Nickel
Date: Monday, January 14, 2019 4:38:01 PM
Attachments: [image001.png](#)

Hi Scott,

Yes, we have some information requests regarding Poseidon Water's (Poseidon's) Copper-Nickel WWS proposal. We have reviewed the report entitled, "Technical Memorandum: Copper Nickel Corrosion Estimates for the Proposed Huntington Beach Desalination Plant – Appendix IIIII," dated November 28, 2018, prepared by twb Environmental Research and Consulting and submitted on behalf of Poseidon to this Regional Water Board for our review. In addition, we forwarded this report to staff of the California Coastal Commission (CCC) and the State Water Resources Control Board (SWB) for their review. The following information requests include the input from staff of CCC and SWB:

1. Clarify which information in the submitted report was provided by Poseidon to the SLC for their CEQA analysis of the Cu-Ni WWS and which information is being provided by Poseidon to state agencies anew to support the Cu-Ni WWS proposal.
2. Page 1 mentions a “protective layer of corrosion byproducts on the metal’s surface.” More discussion of what this phrase means is needed. Please cite which study in appendix 1 is being referenced.
3. Provide documentation for the “available environmental monitoring data” regarding ambient copper concentrations so that Water Boards’ staff can review this information.
4. The results in table 4 appear to be based on an outdated NPDES permit. Please revise these calculations to reflect Poseidon’s currently proposed dilution of 14.5:1 or an explanation of why the results in this report are applicable.
5. Give a detail description of the proposed cleaning procedure for the Cu-Ni WWS and discuss whether the cleaning would be done using boat-based air-burst and scrubbing while the intake is shutdown or in a different manner.
6. Compute the concentration of copper in the water column adjacent to the Cu-Ni WWS during periods of shutdown and/or during periods of cleaning of the WWS.
7. Discuss the potential deposition and accumulation of Cu on the surrounding seafloor (sediment column) and impacts to benthic organisms.
8. Propose a monitoring strategy to measure the release of copper into the sediment and water column surrounding the intake structure during periods of intake shutdown and/or WWS cleaning.
9. We could not verify the data that was referenced in a 14-year corrosion study. We could not find the research paper pertaining to the 14-year corrosion study referenced

in the report. Again, we request that Poseidon submit a copy of the 14-year corrosion study to verify the data.

Please respond to the information requests listed above by February 4, 2019. If you should have any questions regarding this matter please contact me.

Thanks,

Julio C Lara, P.E.
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From: Scott Maloni <smaloni@poseidonwater.com>
Sent: Monday, January 14, 2019 11:05 AM
To: Lara, Julio@Waterboards
Cc: Smythe, Hope@Waterboards; Joy, Jayne@Waterboards; Josie McKinley
Subject: Copper Nickel

Julio, I wanted to follow-up with you to see if you have any questions re: the copper nickel WWS analysis.

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