Date: January 30, 2009

California Regional Water Quality Control Board Central Coast Region Attn: Monitoring and Reporting Review Section 895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401

Dear Mr. Briggs:

Facility Name:			wer Plan Bay, LL			
Address:		Embarca Bay, C	adero Rd A 93442			
Contact Person: Job Title: Phone Number:	Plant	Goschl Manage 595-421	r			
WDR/NPDES Order Number: WDID Number		CA000	3743			
Type of Report (circle one):	Mont Annu	~	Quarte	rly	Semi-An	ınual
Month(s) (circle applicable months*):	JAN	FEB	MAR	APR	MAY	JUN
	JUL	AUG	SEP	ОСТ	NOV	DEC
		ual Reperting per	•	le the fir	st month	of the
Year:	2008					
Violation(s) (Place an X by the appropriate choice):		No (there to report	e are no '	violation	I S	Yes
If Yes is marked (complete a-g):						
a) Parameter(s) in Violation:						

b) Section(s) of WDR/NPDES Violated:

c) Reported Value(s)	
d) WDR/NPDES Limit/Condition:	
e) Dates of Violation(s) (reference page of report/data sheet):	
f) Explanation of Cause(s): (attach additional information as needed)	
g) Corrective Action(s): (attach additional information as needed)	

In accordance with the Standard Provisions and Reporting Requirements, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my knowledge of the person(s) who manage the system, or those directly responsible for data gathering, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

If you have any questions or require additional information, please contact me at the number provided above.

Sincerely,

Name: Steven C. Goschke
Title: Plant Manager

ANNUAL REPORT DISCHARGE MONITORING & REPORTING PROGRAM

MORRO BAY POWER PLANT

2008

Dynegy Morro Bay, LLC Morro Bay Power Plant 1290 Embarcadero Road Morro Bay, CA 93442

EFFLUENT MONITORING REPORT 2008 Summary

Dynegy Morro Bay, LLC. Morro Bay Power Plant

1. GENERAL OVERVIEW

During 2008, discharges were made from discharge paths 001A, 001B, 001C, 001E and 001F. Discharge 001D, cooling water for the thermal compression salt water evaporators, was abandoned in June, 1995, after the evaporators were removed from service.

Chemical analyses are performed by Creek Environmental Laboratories in San Luis Obispo, CA and by FGL Environmental located in Santa Paula, CA, both of which are ELAP certified. CRG Marine Laboratories of Canoga Park are used to perform trace metals analysis of the annually collected intake and Discharge 001 seawater samples using EPA 1640. Samples collected for bioassay analysis are analyzed by Aquatic Testing Laboratories of Ventura. All samples are analyzed using approved methods, and are either analyzed immediately in the field or are appropriately preserved and refrigerated until analyzed at one of the above mentioned offsite laboratories. Discharge flows are estimated from flow integrators and pump operating hours. Redundant, co-located temperature measurements are taken at both the intake and outfall using both continuous temperature strip-chart recorders and, as of June 28, 2006, submersible data loggers set to collect data every 5 minutes.

Following is a summary by calendar quarter of notable NPDES related issues during 2008.

1.1. First Quarter 2008

During the first quarter 2008 monitoring and reporting period, there were no exceedences or violations of any discharge limits.

1.2. Second Quarter 2008

During the second quarter 2008 monitoring and reporting period, there were no exceedences or violations of any discharge limits.

1.3. Third Quarter 2008

During the third quarter 2008 monitoring and reporting period, there were no exceedences or violations of any discharge limits.

1.4. Fourth Quarter 2008

During the fourth quarter 2008 monitoring and reporting period, there were no exceedences or violations of any discharge limits.

There were also several large changes at the Morro Bay Power Plant over the course of 2008. Below are summaries explaining the continuing closure of the formerly permitted RCRA surface

impoundment ponds, the initiation of a two year Goby Monitoring Study, and of the enrollment of the Morro Bay Power Plant under the Industrial Storm Water General Permit.

Surface Impoundment Closure and Discharges (Discharge 001E)

In Fall 2007, the Morro Bay Power Plant (MBPP) began the process of clean closing their RCRA permitted surface impoundment ponds (Discharge 0001E). All field decontamination and closure activities were completed by the close of the 4th quarter 2007, and a closure report was submitted to the Department of Toxic Substances Control (DTSC) and the Central Coast Regional Water Ouality Control Board (RWOCB) on January 29, 2008. DTSC approved the final closure and rescission of the RCRA permit regulating the operation of the surface impoundments in a letter dated August 15, 2008. The MBPP is currently in the process of closing Waste Discharge Requirements Order No. R3-2004-105 (WDR R3-2004-105) held with the RWOCB for the use of these ponds as an industrial discharge. As an interim solution and regulatory relief, the RWQCB Executive Officer issued a letter dated January 20, 2009 granting the rescission of Monitoring and Reporting Program R3-2004-105 (MRP R3-2004-105), thereby absolving the MBPP from all associated monitoring and reporting requirements for the surface impoundments. Effective immediately, the surface impoundments shall no longer be managed as an industrial discharge, and all rain water collected in the ponds shall be treated and discharged as storm water under the General Industrial Storm Water Permit. Upon final WDR closure acceptance by the board, this matter shall be deemed closed and further discussion of the ponds shall be limited to annual storm water reports.

On December 31, 2008, 35,150 gallons of non-hazardous rain water was discharged from the West Surface Impoundment Pond (W-SIP). Prior to discharge, samples were collected and submitted to Creek Environmental Laboratories for analysis. The analytical results, which are presented in Attachment A to Part 2 of this report, confirmed that all concentrations were below permitted discharge limits. Upon acceptance by the RWQCB Executive Officer, these discharge samples will no longer be collected, and any future discharge analysis shall be conducted with the annual storm water discharge sampling events pursuant to the General Industrial Storm Water Permit and the facility Storm Water Pollution Prevention Plan (SWPPP). Boiler cleaning wastes are no longer being directed to the impoundments for treatment and disposal. Any future discharges shall consist of rain water collected and consequently discharged from these impoundments to the facility storm water conveyance system.

Goby Monitoring Study

On August 21, 2008, the Morro Bay Power Plant, received a formal notice by the Regional Water Quality Control Board requesting submittal of technical and monitoring reports. Among these requested reports was a Goby Monitoring Study Plan, required if the plant planned to continue once-through cooling (OTC) operation. In order to facilitate permit reissuance by providing a background data set needed in estimating proportional larval loss due to power plant operation, the Morro Bay Power Plant agreed to conduct a monitoring study of adult and juvenile gobies per the 2007 decision by the Technical Working Group (TWG). On behalf of Dynegy Morro Bay, a Goby Monitoring Study Plan was prepared by David Mayer of Tenera Environmental to provide monitoring and reporting services starting in Nov 2008 through 2010. Initial background

monitoring was initiated in November 2008, and the MBPP plans to conduct follow up sampling pursuant to the submitted Goby Monitoring Study Plan in spring 2009.

Industrial Storm Water General Permit (WQ Order No. 97-03-DWQ) (WDID # 3 40I021953) In their August 21st letter, the RWQCB also mandated that the MBPP submit a Notice of Intent (NOI) for enrollment under the Industrial Storm Water General Permit (WQ Order No. 97-03-DWQ). A facility Storm Water Pollution Prevention Plan (SWPPP) was completed in December and a NOI was submitted to the State Water Resources Control Board (SWRCB) on December 4, 2008. The MBPP received a NOI receipt notice from the SWRCB dated 12/11/2008, and the MBPP now operates under the Industrial Storm Water General Permit (WDID # 3 40I021953).

Annual Intake & Outfall Samples (Source and Receiving Water Samples)

Samples of Discharge 001 effluent were collected on November 12, 2008 pursuant to the annual monitoring and reporting requirements contained in Monitoring and Reporting Program 95-28 (MRP 95-28). At the time of sampling, Unit 3 was out of service due to a planned 12-week outage, therefore only Unit 4's two large cooling water circulating pumps were operating. Though not required by MRP 95-28, and not reported in the attached Data Monitoring Report (DMR), samples were also collected at the MBPP Intake Structure in front of the Unit 3 and Unit 4 intake bays to assess source water analyte concentrations. The Intake Structure samples were collected approximately 20 minutes prior to collection of the Discharge 001 effluent samples to assure to the greatest extent practicable sampling of the same water mass. All samples were collected in appropriately preserved containers and transported under chain-of-custody control to ELAP certified laboratories for analysis as follows:

- FGL Laboratories (ELAP Certificate 1573)
 - o PCBs
 - o Trace Metals
 - o Ammonia as N
- Aquatic Testing Laboratories (ELAP Certificate 1775)
 - o Chronic Toxicity (EPA 600/R-95/136)
- CRG Marine Laboratories (ELAP Certificate 2261)
 - o Trace metals (EPA Method 1640)

As a result of past difficulties accurately determining copper and other target metals at background levels in seawater samples collected at MBPP's intake and discharge, and the prolifically documented matrix interference problems reported in the literature involving the analysis of marine and estuarine samples using various traditional analytical methods, duplicate split samples were collected and submitted to CRG Marine Laboratories for analysis by EPA Method 1640: Determination of Trace Elements in Ambient Water by On-line Chelation Preconcentration and Inductively Coupled Plasma-Mass Spectrometry. MBPP has now submitted duplicate split samples of intake and discharge seawater samples to CRG for trace metals analysis by EPA 1640 since 2003.

EPA Method 1640 is a relatively new, state-of-the-art analytical method developed specifically by EPA for the determination of various metals at or below the very low EPA Water Quality

Criteria (WQC) concentrations and is particularly suited for analysis of estuarine and marine samples. EPA method 1640 employs a pre-concentration step in the sample preparation process that selectively retains the analytes of interest while reducing the saline (high dissolved solids) seawater matrix effect. EPA Region IX has been approving the use of EPA 1640 as an alternate test procedure for the analysis of compliance related marine samples for some time now. Based on the known difficulties analyzing seawater samples for some of the trace metals using traditional methods, and CRG's extensive experience with marine samples and the extremely robust QA/QC package they reported along with the MBPP intake and discharge sample results, the CRG trace metal results are reported in the following data monitoring report forms enclosed with this report.

In addition to the samples collected for chemical analysis discussed above, Intake and Discharge 001 seawater samples were submitted to Aquatic Testing Laboratories for chronic toxicity determination. The bioassay specified in MRP 95-28 involves observing groups of juvenile red abalone (*haliotis rufescens*) for abnormal shell development following three days of being subjected to sample water. Different groups of juvenile abalone are subjected to different dilutions of the sample water with reagent water, including a group subjected to pure sample water (no sample dilution). ATL reported no observable effects in either the undiluted Intake or Discharge 001 samples resulting in a TUc for both of 1. This result is consistent with past results which have never shown any observable chronic toxicity associated with the MBPP discharge.

The following table presents a summary of the results for both the Intake and Discharge 001 samples. As part of their QA/QC regiment, CRG analyzed the Intake sample in replicate providing information relative to the precision of their analysis. To be conservative, the lowest result of CRG's replicate intake analysis is reported here. Comparing the results of the Intake and Discharge 001 samples, it is evident that the two samples are essentially indistinguishable with only one of the thirteen tested parameters higher in the Discharge 001 sample than the Intake sample.

Parameter	Method	Units	Reporting	Discharge	Intake
			Limit	001	
Chronic Toxicity		TUc		1	1
Ammonia-N	4500NH3H	mg/L	0.2	ND	ND
PCB	8082	mg/L	0.0005	ND	ND
Arsenic	1640m	mg/L	0.000015	0.00145	0.00151
Cadmium	1640m	mg/L	0.00001	0.000035	0.000059
Chromium	1640m	mg/L	0.00005	0.000609	0.000734
Copper	1640m	mg/L	0.00002	0.00111	0.00138
Lead	1640m	mg/L	0.00001	0.000097	0.000296
Mercury	245.7m	mg/L	0.00002	ND	ND
Nickel	1640m	mg/L	0.00001	0.001321	0.001042
Selenium	1640m	mg/L	0.000015	0.00001	0.00001
Silver	1640m	mg/L	0.00004	ND	ND
Zinc	1640m	mg/L	0.00001	0.009457	0.009647

Bottom Sediment Monitoring & Reporting

On August 15, 2008 Tenera Environmental collected two replicate sediment samples from each of three discharge (A2, A4, and A5) and three reference sampling locations (A6, A7, and A8). Discharge locations A2, A4, and A5 are all located within the near-shore waters of Estero Bay in the general vicinity of MBPP Discharge 001. Reference location A8 on the other hand is located within Morro Bay near the MBPP Intake Structure (reflective of source water conditions) while reference locations A6 and A7 are located within Estero Bay but at considerable distance south and north of Discharge 001 respectively and outside of the identified area potentially influenced by Discharge 001. The samples were collected in appropriately preserved containers and submitted to Creek Environmental Laboratories in San Luis Obispo for PCB, sulfide, and trace metals analysis. The samples for metals analysis were extracted using the weak acid leachate (WAL) method prescribed in MPR 95-28. Replicate samples from each monitoring location were also submitted to Earth Systems Environmental in San Luis Obispo for particle size distribution analysis.

Each sample was individually analyzed for ten target analytes; eight metals (arsenic, cadmium, hexavalent chromium, copper, lead, mercury, nickel, and zinc), PCB's, and total sulfides. The mean concentration for each replicate pair was then calculated. Both grouped and individual discharge monitoring station results were then statistically compared to the reference station results. Overall, the trends and observations from the 2008 Bottom Sediment monitoring effort were similar to past monitoring events. Following are the main summarized findings as reported by Tenera:

- No Cadmium, hexavalent chromium, or PCBs was detected at any of the sampling stations. Mercury was detected in three of the six discharge samples and two of the six reference samples, but was found at such low levels (just at the detection limit-0.01 mg/kg) that it was considered essentially absent and was not statistically analyzed.
- Reference station A8, located within Morro Bay near the Intake Structure, had the highest average concentration of zinc and nickel and was the only station with detectable sulfides.
- Lead concentrations exhibited significant concentration differences between reference stations and discharge stations A2 and A5. However, due to an insignificant difference in lead concentrations between the reference stations and discharge station A4, there was no overall significant difference between discharge stations and all reference stations. Also important to note is that replicates for A5 and A2 were significantly different from one another (A5 with 71 and 34 mg/kg and A2 with 13 and 31 mg/kg) suggesting possible analytical discrepancies.
- No significant difference was observed between the discharge and reference monitoring stations for nickel, zinc, or copper overall. However, the average concentration of zinc found at station A4 was significantly lower than that found at the reference stations.

The final 2008 NPDES Sediment Monitoring Report was previously submitted to the RWQCB under a separate cover letter date January 13, 2009. Please refer to this document for greater detail and in depth discussions of the sample collection methods, statistical analysis employed, and report findings.

Hydrographic Survey

Tenera Environmental performed a hydrographic survey of the area in front of, and adjacent to, the MBPP Intake Structure on August 26,2008 between 0900 and 1056 PST. The area included the entire 240 ft width of the Intake Structure and adjacent areas, 100 feet to the southeast, 200 feet to the northwest and 300 feet offshore. The bottom surface of the bay in the survey area was mapped using a Biosonics DTX digital echo sounder mounted in a 13 foot skiff equipped with a differential global positioning system (DGPS). The skiff was piloted at 2 and 3 knots along predetermined tracks spaced approximately 15-20 feet apart first in a criss-crossing east-west to north-south trending pattern.

The results of the survey indicate that "[i]n general, the near-intake bottom depths were similar to those measured in years past." Water depths directly in front of the intake bays and out to a distance of 150 feet ranged between -10.1 ft and -19.1 ft MLLW with an average of -16.5 ft MLLW. On average, the 2008 results were -0.6 feet deeper than the previous survey performed Ocober 3, 2007. The results of the hydrographic survey were previously submitted to the Central Coast Regional Water Quality Control Board under a separate cover letter dated January 13, 2009. Please refer to this report for further detail and discussion.

Intake Approach Velocity Monitoring

Tenera Environmental performed intake approach velocity monitoring in front of the MBPP cooling water intake structure on August 13, 2008 between 1104 and 1450 PST. Velocities were measured in slack water with little tidal movement in front of the Unit 3 and Unit 4 in take bays using a 1 MHz Sontek Acoustic Doppler Profiler (ADP) from 1104 to 1213 PST and a 2 MHz Nortek Acoustic Doppler Current Profiler (ACDP) from 1252 to 1450 PST for comparison. Each of Unit 3 and Unit 4's circulating water pumps were in operation at the time of measurement. Duke Energy, a previous owner of the MBPP, previously received RWQCB approval in 2004 to forego approach velocity testing of Unit 1 and Unit 2 since neither unit had seen operational service since the fall of 2003. Since neither Unit 1 nor Unit 2 operated during the 2007 monitoring and reporting period, approach velocity testing was again not performed. Should either unit be returned to service, approach velocity testing will be resumed and the RWQCB notified.

The results of the 2008 intake approach velocity monitoring indicate that the spatial average during the study was 0.67 fps with maximum and minimum speeds of 0.81 and 0.56 fps measured by the Sontek ADP and 0.68 fps with identical maximum and minimum speeds of 0.81 and 0.56 fps measured by the Nortek ADCP. The average of Unit 3 speeds exceeded the Unit 4 average only as measured by the Nortek ADCP. The Sontek ADP measured its highest bay average speed at Unit Bay 3-2. The results of the Intake Approach Velocity Monitoring were previously submitted to the Central Coast Regional Water Quality Control Board under a separate cover letter dated January 13, 2009.

2. OPERATOR CERTIFICATION

Morro Bay Power Plant is a private treatment facility that treats only industrial waste. Operators of this facility are not required to be certified under Title 23 CCR. The NPDES discharge program is administered and monitored by the following staff members:

Steven C. Goschke Plant Manager Thomas A. Lott Plant Engineer

Ninah Rhodes Hartley Environmental Compliance Specialist

Dissolved oxygen (DO), pH, and residual chlorine are measured in the field by trained field technicians from Creek Environmental Laboratories. During 2008, samples collected pursuant to the requirements of Monitoring & Reporting Program 95-28 were analyzed by the following ELAP certified laboratories using approved and industry standard analytical methods:

- > Creek Environmental Laboratories (ELAP Certification 1958)
- > FGL Laboratories (ELAP Certification 1573),
- > CRG Marine Laboratories (ELAP Certification 2261)
- ➤ Aquatic Testing Laboratories (ELAP Certification 1775)

3. FACILITY OPERATING AND MAINTENANCE MANUALS

The primary operating, maintenance, and contingency instructions and plans for Morro Bay Power Plant are contained in the documents listed below. These manuals are complete and valid for this facility.

ManualDate of Last ReviewMorro Bay O&M ProceduresLast Revised 4th Quarter 2008Morro Bay Power Plant Operating OrdersLast Revised 4th Quarter 2007Facility Emergency Plan, Morro Bay Power PlantLast Revised July 2006

4. SLUDGE MONITORING

Sludge is produced as a result of solids settling in the boiler wash, waterside rinse, and chemical cleaning holding ponds. Since the pond clean closure in fall 2007, no discharges have been made to the ponds, hence no annual cleaning or sludge removal has occurred in 2008. The only material collected in the ponds during 2008 has been rain water which has been tested and discharged under the MBPP's NPDES permit (NPDES CA0003743, Order 95-28). As of December 2008, the MBPP began operating under the Industrial Storm Water General Permit (WQ Order No. 97-03-DWQ) and was granted permission by the RWQCB in a letter dated January 20, 2009 to treat all discharges from the surface impoundments as storm water discharges. The MBPP does not foresee future hazardous waste production from the surface impoundment ponds. No chemical boiler cleanings or stack washes were conducted during the 2008 reporting period, nor shall any occur from this point onward.

SUMMARY OF MONITORING PROGRAM AND REQUIRED REPORTS MONITORING OF PLANT INFLUENT AND EFFLUENT

PART 1: Descriptions of intake and discharge paths

PART 2: 2008 Discharge Tabular Summary

PART 3: 2008 Discharge Trend Charts

PART 4: Certification for Ocean Plan Constituent Monitoring

PART 1

INTAKE AND DISCHARGE FLOW PATH DESCRIPTIONS

DYNEGY MORRO BAY, LLC. MORRO BAY POWER PLANT EFFLUENT MONITORING REPORT ORDER NO. 95-28

INTAKE

Temperature readings are taken at the intake structure before the bar racks by a continuous temperature recorder. Grab samples for pH determination are collected using a 5-gallon plastic bucket cast from the shore. Sample is analyzed in the field by trained and qualified Creek Environmental Laboratories personnel.

DISCHARGE 001A

Flow of once-through cooling water is estimated from pump operating hours and pump efficiency on a daily basis.

Grab samples for pH and residual chlorine analysis are collected in plastic sample bottles at the outfall channel, beyond the point dividing units 1 & 2 and units 3 & 4 discharge tunnels. To ensure to the greatest extent practical that the same water mass is sampled; discharge samples are collected 15-20 minutes after sampling the intake. Total dissolved oxygen, pH and residual chlorine are measured immediately in the field using field portable instruments by trained and qualified Creek Environmental Laboratories personnel.

Table 1: Discharge 001A

Parameter	Container	Preservative	Analytical	Frequency
			Method	
Residual	Not	Not	SM 4500G	Weekly when
Chlorine	Applicable	Applicable	(field measurement)	chlorinating
pН	Not	Not	EPA 150.1	Weekly when
	Applicable	Applicable	(field measurement)	discharging
CAM	500 ml	HNO ₃	EPA 6010 or EPA 200.8 (ICPMS) and	Annually
Metals	plastic		EPA 1640(ICPMS)	
			and for mercury: EPA 7470, EPA 245.1,	
			or EPA 245.7m	
Chronic	5L Plastic	None	Short Term Methods for Measuring	Annually
Toxicity			Chronic Toxicity of Effluents and	
			Receiving Waters to West Coast Marine	
			Organisms (EPA/R-95/136)	
Ammonia	500 ml plastic	H ₂ SO ₄	EPA 350.1 or EPA 4500NH3H	Annually

Temperature readings are taken in the outfall canal approximately 60 feet down stream of the concrete discharge headwork. Temperatures are recorded on a continuous temperature recorder.

DISCHARGE 001B

Screen wash flow is estimated from scheduled daily operation cycles.

DISCHARGE 001C

Brine discharge from the vapor compression evaporator is estimated by subtracting the volume of product produced from the volume of feed water supplied to the evaporator. The effluent stream is composed of both evaporator brine and overflow sea water from the feed water stilling tank. Grab samples of evaporator brine are collected in both 1 liter glass bottles containing HCl preservative and 500 ml plastic bottles for analysis of oil & grease and total suspended solids respectively. The samples are transported to Creek Environmental Laboratories under chain-of-custody and analyzed within applicable holding times. Concurrent evaporator make-up (influent) samples are collected to assess influent loading.

Table 2: Discharge 001C

Parameter	Container	Preservative	Analytical	Frequency
			Method	
Total Suspended	250-500 ml	None	EPA 160.2 or	Weekly when
Solids	plastic		SM 2540D	discharging
Oil & Grease	1 L glass	H2SO4	EPA 1664	Weekly when
				discharging

DISCHARGE 001D

Discharge 001D, cooling water flow to the thermal compression evaporators, is no longer in use. The thermal compression evaporators have been replaced with an evaporator that does not require cooling water. Accordingly, the attached influent and effluent monitoring report does not include data for discharge 001D.

DISCHARGE 001E

Prior to discharge, the holding pond water is circulated through a closed loop, taking suction from one end of the impoundment and discharging to the opposite end of that same impoundment. Samples of the holding pond water are collected and analyzed as shown in the following table by Creek Environmental Laboratories. If the sample results are below NPDES limits, the holding pond water is valved to discharge 001A. On October 27, 2004 at their regularly scheduled hearing, the RWQCB approved modifications to the waste discharge requirements for the surface impoundment ponds to include sampling and analysis for CAM metals and pH from all routine discharges in addition to previously required total suspended solids and oil & grease.

Table 3: Discharge 001E

Parameter	Container	Preservative	Analytical Method	Frequency	Effluent Limitation
Total Suspended Solids	250-500 ml plastic	None	EPA 160.2 or SM 2540D	Weekly when discharging	Yes
Oil & Grease	1 L glass	H2SO4	EPA 1664	Weekly when discharging	Yes
CAM Metals	500 ml plastic	HNO3	EPA 200.8, EPA 6010, or EPA 6020 Mercury by EPA 245.1 or EPA 7470	At least one sample per discharge event per impoundment	No
рН	NA	NA	EPA 150.1 (field measurement) or SM 4500-H B	At least one sample per discharge event per impoundment	Yes

Flow meter integrators on the pump discharge are used for estimating the flow of each discharge from the holding ponds.

DISCHARGE 001F

Flow from the oil-water separator system is estimated from daily integrator readings. Grab samples of the system effluent are collected for total suspended solids and oil & grease analysis from a sample tap on the discharge header using the containers and preservatives shown in Table 4. The samples are submitted under chain-of-custody to Creek Environmental Laboratories for chemical analysis.

Table 4: Discharge 001F

Parameter	Container	Preservative	Analytical	NPDES WDR Limit
			Method	
Total Suspended	250-500 ml	None	EPA 160.2 or	Weekly when
Solids	plastic		SM 2540D	discharging
Oil & Grease	1 L glass	H2SO4	EPA 1664	Weekly when
				discharging

PART 2

2008 DISCHARGE TABULAR SUMMARY

TET OLD TET								DISCH	DISCHARGE SELF MONITORING REPORT	MONITORIN	G REPORT													
State Stat	ORNIA REGIONAL W ROL BOARD RAL COAST REGION FROVISTA PLACE, SI	ATER QUA	<u>L</u>												DYNEC MORR 1290 E	SY MORRO TO BAY PON EMBARCAD		r PAGE (A) 1						
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25.9 2.0 51.8 52.9 50.3 53.4 56.6 52.1 no heat trmt no heat trmt no chlorination 195.2 2.0 54.0 56.7 51.4 55.6 58.1 53.5 no heat trmt no heat trmt no chlorination 2390.5 2.0 54.8 57.4 52.3 58.0 69.9 53.7 no heat trmt no heat trmt no chlorination 405.2 2.0 58.1 61.5 57.8 58.7 no heat trmt no heat trmt no chlorination 174.2 2.0 56.1 61.5 57.9 56.0 61.5 58.2 no heat trmt no heat trmt no chlorination 184.7 2.0 57.3 59.6 54.9 57.9 65.1 56.2 no heat trmt no heat trmt no chlorination 154.8 157.1 60.2 54.9 57.9 65.1 56.2 no heat trmt no heat trmt no chlorination 154.7 155.9 58.7 no heat trmt no chlorination 154.7 155.9 58.7 no heat trmt no chlorination 155.7 155.9 58.7 155.9 no chlorination 155.7 155.9 58.7 no chlorination 155.7 no chlorination 15	3.1									92	heat	tmt	01	heat	trmt		chlorination		0	chlorination		02	chlorination	
195.2 2.0 51.8 52.9 50.3 53.4 56.6 52.1 no heat trmt no heat trmt no heat trmt no heat trmt no chlorination 390.5 2.0 56.7 56.7 58.1 55.5 58.7 no heat trmt no chlorination 405.2 2.0 58.1 62.7 72.3 57.8 no heat trmt no heat trmt no heat trmt no chlorination 174.2 2.0 58.1 61.5 58.2 no heat trmt no chlorination 184.7 2.0 57.3 56.5 58.2 no heat trmt no chlorination 25.5 57.3	3.6			,						2	heat	tmt	92	heat	trmt		chlorination		0	chlorination		0	chlorination	
25.9 2.0 54.0 56.7 51.4 55.6 58.1 53.5 no heat trmt no heat trmt no chlorination 290.5 2.0 55.6 58.4 52.3 58.0 69.9 53.7 no heat trmt no heat trmt 0.05 0.05 0.05 0.05 0.05 0.05 0.05 0.0	11.				52					2	heat	trmt	20	heat	trmt		chlorination		0	chlorination		0	chlorination	
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174.2 2.0 60.1 61.5 57.9 60.0 61.5 58.2 no heat trmt no heat trut no h	99									o.	heat	trmt	2	heat	tmt		hlorination		00	chlorination		92	chlorination	
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2.02	4.0	25.5	.5 2.0	.0 57.3			1	7.7 60.2	54.9	ou ou	heat	trmt	00	heat	tm	9	chlorination		02	chlorination		02	chlorination	
10.9 107.0 2.0 54.9 58.3 52.6 55.4 58.3 53.1 no heat trmt no heat trmt no no	10.									Q.	heat	trmt	2	heat	tmt	92	2		01	chlorination		00	chlorination	
YEARLY 21.3 405.2 2.0 55.2 61.6 50.3 56.9 75.9 52.0 NO HEAT TRMT NO HEAT TRMT 0.00 0.05 ND (<0.02)										ON N	HEAT	TRMT	ON	HEAT	TRMT	0.00		D (<0.02)	7.93	7.96	7.90	7.86	7.92	7.80
TIMES EXCEEDED MAX: MAX: MAX: TIMES EXCEEDED 725 = 0 INTAKE + 30 = 0 TIMES EXCEEDED INTAKE + 35 = 0	EXCEEDED EXCEEDED EXCEEDED	MAX: 725 = 1			_			MAX: INTAKE +	30 = 0				- Ī	MAX: FAKE + 35 = 1	0						444	pH < 7.0 = 0 pH >8.3 = 0 pH Diff. <0.2	0 =	

(1) Flow data in March and November were normalized to 24 hour period to reflect changes due to Daylight Savings Time (2) ND = "Not Detected" at or above specified laboratory reporting limit (ex. <0.01). REMARKS:

PRINCIPAL EXECUTIVE OFFICER STEVEN C. GOSCHKE

0.0071429

							-	DISCHARGE	SELF MON	DISCHARGE SELF MONITORING REPORT	EPORT								
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION 895 ARROVISTA PLACE, SUITE 101	NAL WATER GION CE, SUITE 1	: QUALITY											DYNEGY MORRO BAY, LLC. MORRO BAY POWER PLANT 1290 EMBARCADERO MORRO BAY, CA 93442 F	O BAY, LLC OWER PLAN NDERO	TT PAGE (A) 2				
OAN LOIS CONSTO, C	FACILITY I.D. 3 402003002	Ö ÷			_ , 3	BEGINNING YEAR/MO/DAY 08/01/01	AY				ш > О	ENDING YEAR/MO/DAY 08/12/31	ST, CODE			NPDES PERMIT # CA0003743	# LIN		
SIS	DISCH 001B FLOW 1000 GPD ESTIMATED			DISCHG 001C FLOW 1000 GPD ESTIMATED	9		DISCH 001C T. SUS SOLIDS MG/L GRAB	Sd		DISCHG 001C OIL & GREASE MG/L GRAB	0 #		DISCHG 001E FLOW 1000 GPD ESTIMATED	001E		DISCHG 001E T SUS SOLIDS MG/L GRAB	a &		
FREQ	DAILY	Ŧ	9	DAILY	豆	2	AVG	Ī	10	AVG	Ξ	07	AVG	Ī	10	AVG	H	10	
NAC	1200	1200	1200	0:0	0:0	0:0		no discharge			no discharge		3.3	103.1	0.0	(5>) QN	(5>) QN	ND (<5)	
EB	1200	1200	1200	0:0	0:0	0:0		no discharge		J	no discharge		1.7	52.0	0.0	(5>) QN	ND (<5)	ND (<5)	
MAR	1200	1200	1200	0:0	0:0	0:0		no discharge			no discharge			no discharge		-	no discharge		
APR	1200	1200	1200	0.0	0:0	0:0		no discharge		J	no discharge		0.5	14.8	0.0	15.0	15.0	15.0	
MAY	1200	1200	1200	11.5	273.2	0.0	14.0	14.0	14.0	ND (<5)		ND (<5)		no discharge			no discharge		
NOC	1200	1200	1200	30.2	265.4	0.0	28.0	28.0	28.0	(5>) QN	ND (<5)	ND (<5)		no discharge			no discharge		
nr	1200	1200	1200	27.5	271.5	0.0	18.5	28.0	9.0	(5>) QN	(5>) QN	ND (<5)		no discharge			no discharge		
AUG	1200	1200	1200	0.0	0:0	0.0		no discharge			no discharge			no discharge			no discharge		
SEP	1200	1200	1200	25.9	270.7	0.0	15.0	15.0	15.0	ND (<5)	(<>) QN	ND (<5)		no discharge			no discharge		
OCT	1200	1200	1200	0:0	0.0	0.0		no discharge			no discharge			no discharge			no discharge		
NON.	1200	1200	1200	0.0	0:0	0.0		no discharge			no discharge			no discharge			no discharge		
DEC	1200	1200	1200	0:0	0.0	0.0		no discharge			no discharge		7:	35.2	0.0	15.0	15.0	15.0	
YEARLY	1200	1200	1200	7.9	273.2	0.0	18.9	28.0	0.6	ND (<5)	ND (<5)	ND (<5)	1.7	103.1	0.0	7.5	15.0	(<5) UN	
TIMES EXCEEDED TIMES EXCEEDED TIMES EXCEEDED							30-D AV 30=0 D MAX 100=0	٥		30-D AV 15=0 D MAX 20=0						30-D AV 30=0 D MAX 100=0	0.0		

S: (1) ND = "Not Detected" at or above specified laboratory reporting limit (ex. <0.01).

ER	
PRINCIPAL EXECUTIVE OFFICER	STEVEN C. GOSCHKE

SIGNATURE OF AUTHORIZED AGENT	DATE
MM	\$6/19/69

							ā	DISCHARGE SELF MONITORING REPORT	MONITORING	3 REPORT												
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION	NAL WATEI	R QUALITY												DYNEG MORR 1290 E	DYNEGY MORRO BAY, LLC. MORRO BAY POWER PLANT 1290 EMBARCADERO	3AY, LLC. FER PLANT FRO						
895 AEROVISTA PLACE, SUITE 101 SAN LUIS OBISPO. CA 93401	CE, SUITE	101												MORR	MORRO BAY, CA 93442		PAGE (A) 3					
					BE	BEGINNING					ENDING			•			•					
0 5	FACILITY I.D. 3 4020003002	.D.			3. ¥8	YEAR/MO/DAY 08/01/01	ΑΥ				YEAR/MO/DAY 08/12/31	DAY		w 0	ST. CODE		2 0	NPDES PERMIT# CA0003743				7
							10000		The Chicago	7		100 OU COLO	u		DISCHO DOTE			INTAKES		DISCH 001		
STATION	DISCH 001E	E PSF		DISCHG 001E	Į.		DISCHG 001E		PISCHG	<u>.</u>		T SUS SOLIDS	_ SC	1 0	OIL & GREASE	Щ	<u> </u>	PH Ha		HA HA		
	MG/L	1		MG/L		_=	MG/L		1000 GPD	_		MG/L		2	MG/L			PH UNITS		PH UNITS		
TYPE	GRAB			GRAB			GRAB	Š	ESTIMATED	O.		GRAB		<u> </u>	GRAB		0 6	GRAB @CHMMcT DIS		GRAB @CHMMAST DIS	SIC.	
FREG	WEEKLY	Ī	9	AVG H	- I	2	AVG H	SI =	AVG	Ξ	91	AVG	Ŧ	10	AVG	Ξ	P	AVG HI	OT	AVG	-	2
NAL	(5>) QN	(45) QN	ND (<5)	ļ	no discharge		1	l ge	10.5	62.2	3.3	1.0	5.0	(5>) ON	6	ND (<5)	ND (<5)	no discharge	rge		no discharge	
H. H.	(S) CN	ND (<5)	ND (<5)		no discharae		- 5	no discharge	6.3	55.3	2.5	3.3	8.0	ND (<5)	(<5) ON	(\$>) QN	ND (<5)	no discharge	eßı		no discharge	
M 4M		no	_		no discharge		100	no discharae	4.6	19.3	2.1	ND (<5)	<u></u>				(S>) QN	no discharge	ığe		no discharge	
APR	(S>) QN	ND (<5)	ND (<5)		no discharge		9	no discharge	5.8	28.5	2.3	1.8		ND (<5)	2.0		ND (<5)	no discharge	rge		no discharge	
MAY		no discharge			no discharge		Ö	no discharge	7.2	28.9	2.3	8.	7.0	ND (<5)	3.0	12.0	(5>) QN	no discharge	ge		no discharge	
NDL		no discharge			no discharge		Θ	no discharge	6.6	32.2	2.4	(\$>) QN	ND (<5)	(5>) QN	4.8	19.0	ND (<5)	no discharge	ığe		no discharge	
nr		no discharge			no discharge		σ̈	no discharge	9.2	43.3	2.8	(<5) UN	ND (<5)	ND (<5)	(<>) ON	ND (<5)	ND (<5)	no discharge	ge		no discharge	
AUG		no discharge			no discharge		σ̈	no discharge	8.6	31.4	3.2	1.5	0.9	ND (<5)	ND (<5)	ND (<5)	ND (<5)	no discharge	e G		no discharge	
SEP		no discharge			no discharge		<u>d</u>	no discharge	7.2	37.8	1.7	1.5	0.9	(5>) QN	1.3	5.0	(\$>) QN	no discharge	- Jû		no discharge	1
OCT		no discharge			no discharge		σ̈	no discharge	6.2	26.3	2.1	1.0	5.0	ND (<5)	(c>) QN	ND (<5)	ND (<5)	no discharge	ığe		no discharge	
NOV		no discharge			no discharge		ō	no discharge	4.5	8.3	5.6	(5>) QN	ND (<5)	ND (<5)	(5>) QN	(5>) QN	ND (<5)	no discharge	g		no discharge	
DEC	ND (<5)	ND (<5)	ND (<5)		no discharge		ਰ	no discharge	7.2	30.4	2.7	5.6	23.0	ND (<5)	3.2	16.0	ND (<5)	no discharge	g		no discharge	
YEARLY	ND (<5)	ND (<5)	(9>) QN		no discharge		Ö	no discharge	7.3	62.2	1.7	4.1	23.0	ND (<5)	1.5	19.0	ND (<5)	no discharge	gj		no discharge	
TIMES EXCEEDED 30-D AV 15=0 TIMES EXCEEDED D MAX 20=0 TIMES EXCEEDED	30-D AV 15 D MAX 20≔	0 0		30-D AVG 1=0 D MAX 1=0	0:		30-D AV 1=0 D MAX1=0					30-D AV 30=0 D MAX 100=0	٥٥	8 🗆	30-D AV 15=0 D MAX 20=0							

(1) ND = "Not Detected" at or above specified laboratory reporting limit (ex. <0.01). REMARKS:

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PRINCIPAL EXECUTIVE OFFICER	HKE
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	SIG	104
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								DISCHARG	E SELF MO	DISCHARGE SELF MONITORING REPORT	EPORT													
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION 895 AEROVISTA PLACE, SUITE 101	AL WATER OGION	αυλμηγ)1													DYNEG' MORR(1290 EI MORRC	DYNEGY MORRO BAY, LLC. MORRO BAY POWER PLANT 1290 EMBARCADERO MORRO BAY, CA 93442 P		r PAGE (A) 4						
SAN LUIS OBISPO, C.	A 93401 FACILITY I.D. 3 402003002					BEGINNING YEAR/MO/DAY 08/01/01	.s ≻AC				w > 0	ENDING YEAR/MO/DAY 08/12/31	ΑY		ST.	ST. CODE 06		z o	NPDES PERMIT # CA0003743	# <u></u>				
SIS TYPE	DISCH 001 ARSENIC MG/L GRAB			DISCH 001 CADMIUM MG/L GRAB			DISCH 001 LEAD MG/L GRAB			DISCH 001 SILVER MG/L GRAB			DISCH 001 HEX CHROM MG/L GRAB		<u>□ ∞ ≥ ⊙ </u> \$	DISCH 001 SELENIUM MG/L GRAB			DISCH 001 MERCURY MG/L GRAB		DISCH PCB'S MG/L GRAB	DISCH 001 PCB'S MG/L GRAB		
FREQ	ANNUALLY	Ī	2	ANNUALLY	Ξ	2	ANNUALLY	Ī) C	ANNOALLY	Ī	9	AVG	Ī	2	AVG	F	9	AVG	=	07	AVG	토	2
JAN	2		3																					
FEB																								
MAR																			+		+			
APR																					-			
MAY																								
NOF															2									
JUL																-								
AUG																								
SEP														•										
ОСТ																								
NOV	0.00145	0.00145	0,00145	0.00004	0.00004	0.00004	0.00010	0.00010	0.00010	Q	Ð	Q	0.00061	0.00061	0.00061	0.00001	0.00001	0.00001	0.00001 0.	0.000001 0.0	0.00001	Q	Q	Q
DEC VEADIV	0.00145	0.00145	0 00145	0 00004	0.00004	0.00004	0.00010	0.00010	0.00010	ND 40.00004	ND <0.0000	ND 40.00000	0.00061	0.00061	0.00061	0.00001	0.00001	0.00001	ND <0.00002	ND	ND <0.00002 <0.	ND <0.0005	ND <0.0005	ND <0.0005
TIMES EXCEEDED 6-M MED 0.06-0 TIMES EXCEEDED D MAX 0.33-0 TIMES EXCEEDED I MAX 0.88-0	5-M MED 0.06) MAX 0.33=(MAX 0.88=0	0=0		4 2 2 1	01=0 =0 3		6-M MED 0.02=0 D MAX 0.09=0 I MAX 0.23=0	.02=0 ==0 :0		6-M MED 0.0063=0 D MAX 0.0303=0 I MAX 0.0781=0	1 1	ـ د پ	4 ≧ & T	0=0	\$ C =	ا تا ف خا	0=,	<u>\$</u> 0 €						

REMARKS:

(1) ND = "Not Detected" at or above the laboratory reporting limit specified in parenthasis "(1)".
(2) Though analyzed by both EPA 3010/2008 and EPA 1640, reporting limit for silver presented above is based on EPA 1640 analysis. Laboratory reported matrix interference problems using EPA 3010/2008 and therefore reported elevated reporting limits above

six-month discharge limit for silver.

PRINCIPAL EXECUTIVE OFFICER STEVEN C. GOSCHKE

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						ă	SCHARGE &	ELF MONI	DISCHARGE SELF MONITORING REPORT	-ORT											
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION 895 AEROVISTA PLACE, SUITE 101 SAN LUIS OBISPO, CA 93401	NAL WATER EGION ACE, SUITE	R QUALITY								i	9			DYNEG MORR ⁱ 1290 EI MORR ⁽	DYNEGY MORRO BAY, LLC. MORRO BAY POWER PLANT 1290 EMBARCADERO MORRO BAY, CA 93442 F		T PAGE (A) 5				
75	FACILITY I.D. 3 402003002	Q 2		98 34 80	BEGINNING YEAR/MO/DAY 08/01/01					08 YE	ENDING YEAR/MO/DAY 08/12/31	>-		ග ඊ	ST. CODE 06		2 0	NPDES PERMIT # CA0003743			
STATION ANALYSIS UNITS	DISCH 001 DISS OXYGEN MG/L	NEN NEN			DISCH	DISCH 001 COPPER MG/L		DISCH	DISCH 001 NICKEL MG/L		i iz w	DISCH 001 ZINC MG/L			DISCH 001 AMMONIA (N) MG/L	=			DISCH 001 CHRON TOX TUc	×	
YPE	GRAB QUARTERLY	≻.			GF AN	GRAB ANNUALLY		G A	GRAB ANNUALLY		P S	GRAB ANNUALLY		<u>β</u> <u>A</u>	GRAB ANNUALLY				GRAB ANNUALLY		
	AVG	Ξ	07			AVG	Ī	07	AVG	H	10	AVG	Ξ	의	AVG	ェ	OJ		AVG	Ξ	07
JAN																					
FEB	8.8	8.8	8.8																		
MAR																					
APR																					
MAY																					
NUL	11.0	11.0	11.0																		
JUL																					
AUG	11.0	11.0	11.0																		
SEP					·																
ОСТ																					
NOV	8.4	8.4	8.4		0	0.00111 0.	0.00111 0.	0.00111 0.	0.00132 0.0	0.00132 0.	0.00132 0	0.00946 0.	0.00946 0	0.00946	Q.	Q	Q		1.0	1.0	1.0
DEC																					
YEARLY	8.6	11.0	4.8		0	0.00111 0.	0.00111 0.	0.00111 0.	0.00132 0.0	0.00132 0.	0.00132 0	0.00946 0.	0.00946 0	0.00946	0.2	0.0 0.2	0.2		1.0	1.0	1.0
TIMES EXCEEDED TIMES EXCEEDED					1-9- Q	6-M MED 0.01=0 D MAX 0.12=0	0	4 0 1	6-M MED 0.06=0 D MAX 0.23=0	o.	-6- -0	6-M MED 0.14=0 D MAX 0.83=0	0=	۔ ۵ ف	6-M MED 6.84=0 D MAX 27.36=0 I MAX 68.40=0	4=0 =0			D MAX 11.4=0	0=	
IIMES EXCEEDED II MIN SS = 0) = C> NIIW I				, i	77 U.35-U			0.00			2077			2000						

REMARKS:

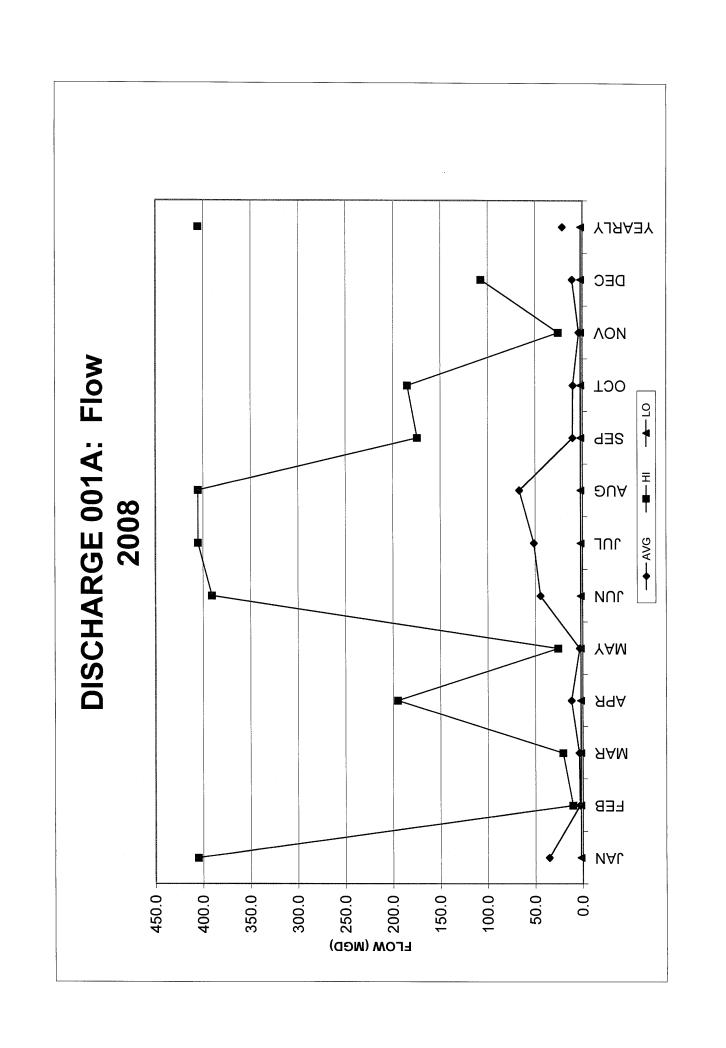
(1) ND = "Not Detected" at or above specified laboratory reporting limit (ex. <0.01).
(2) Copper anzyed by CRG Environmental Laboratories (ELAP Certified) using EPA method 1640 (ICP-MS-Chelation Preconcentration) to address known matrix interference due to high sodium (Na) levels in sea water.

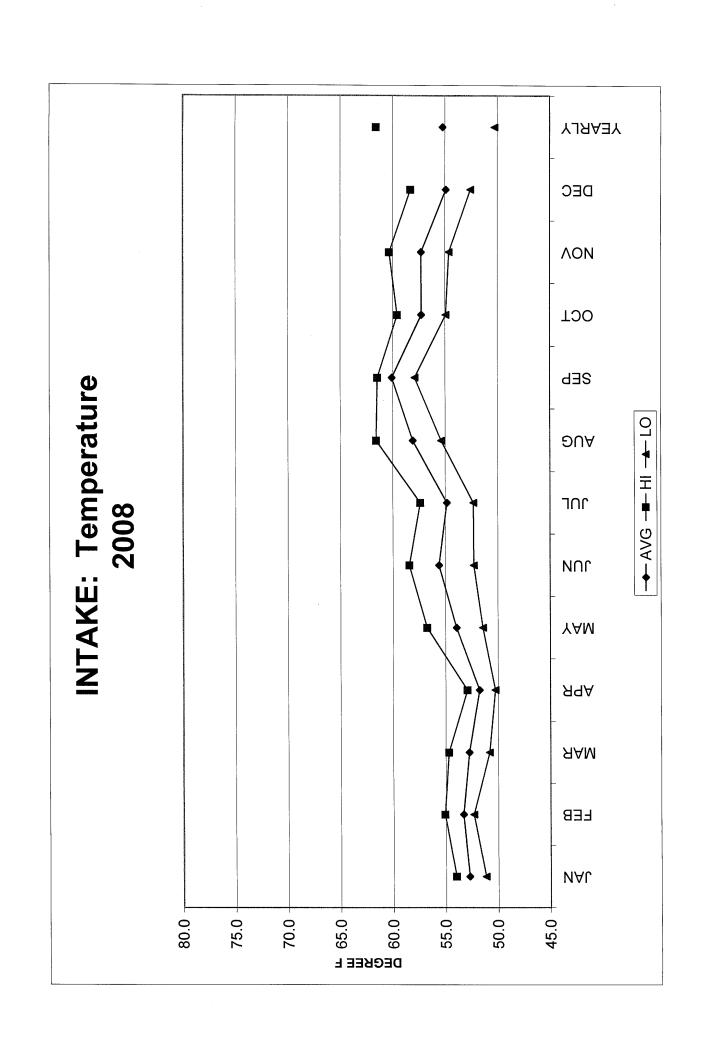
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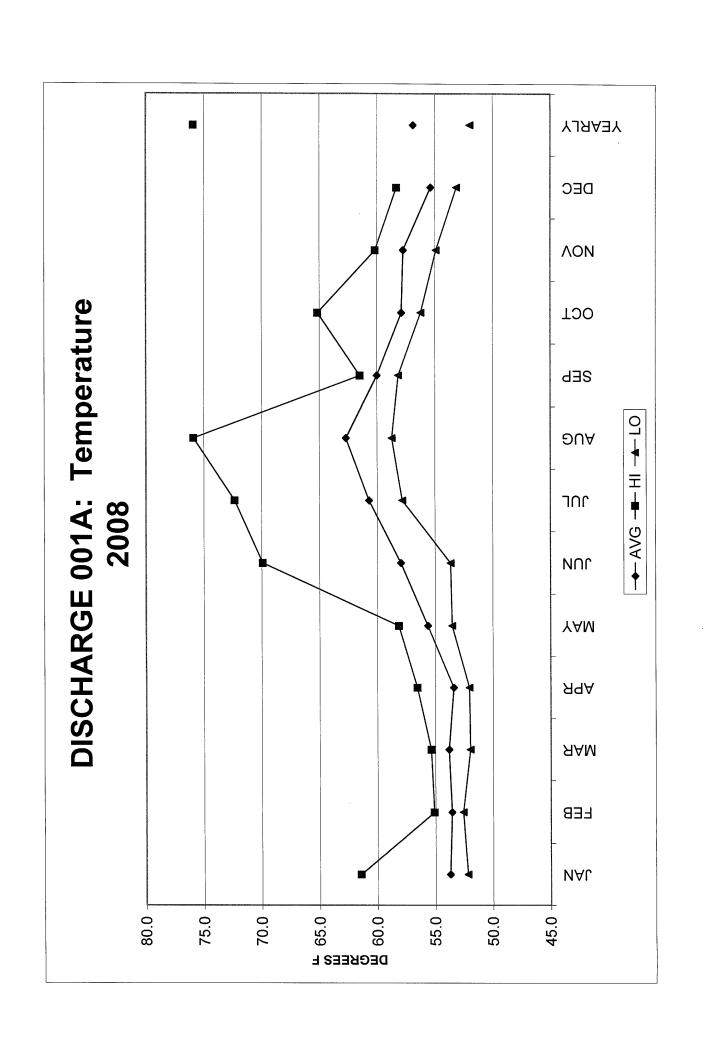
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SIGNATURE OF AUTHORIZED AGENT	12/2	
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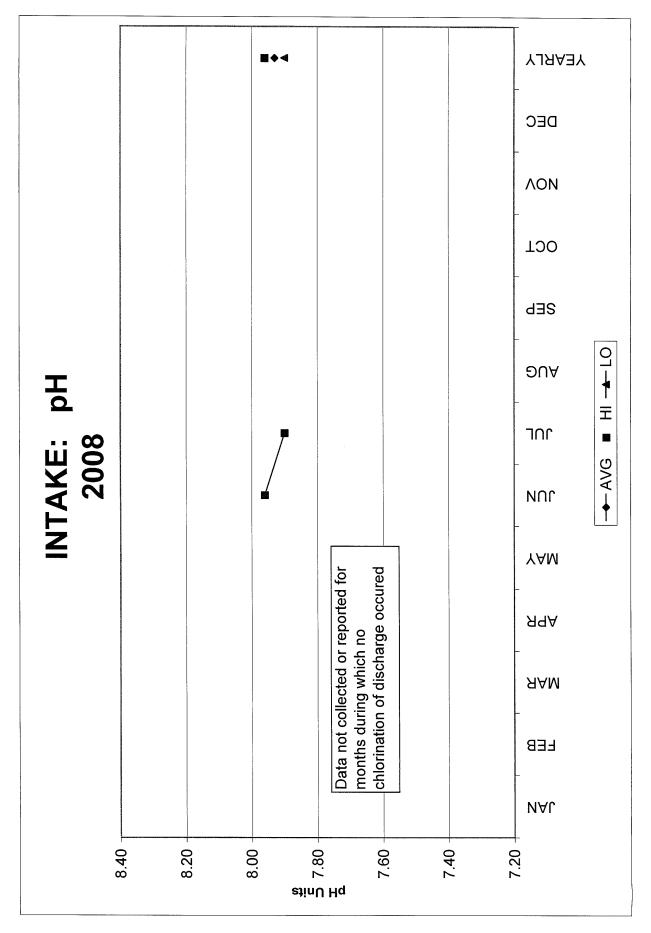
******	2008 Annu	al Intake ar	nd Outfall	Samplin	g Results	3	
		Morro B	ay Power F	Plant			
			Re	sult	Dis	scharge Lim	nits
Parameter	Date	RL	Intake	Outfall	6-Mnth Av	Daily Max	Inst. Max
	Sampled	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)
Arsenic	15-Nov-08	0.000015	0.00151	0.00145	0.06	0.33	0.88
Cadmium	15-Nov-08	0.00001	0.000059	0.000035	0.01	0.05	0.11
Chromium (total)	15-Nov-08	0.00005	0.000734	0.000609	0.02	0.09	0.23
Copper	15-Nov-08	0.00002	0.00138	0.00111	0.01	0.12	0.32
Lead	15-Nov-08	0.00001	0.000296	0.000097	0.02	0.09	0.23
Mercury	15-Nov-08	0.00002	ND	ND	0.0005	0.0018	0.046
Nickel	15-Nov-08	0.00001	0.001042	0.001321	0.06	0.23	0.57
Selenium	15-Nov-08	0.000015	0.00001	0.00001	0.17	0.68	1.71
Silver	15-Nov-08	0.00004	ND	ND	0.0063	0.0303	0.0781
Zinc	15-Nov-08	0.00001	0.009647	0.009457	0.14	0.83	2.2
Ammonia	15-Nov-08	0.2	ND	ND	6.84	27.36	68.4
PCB's	15-Nov-08	0.0005	ND	ND			
Chronic Toxicity	15-Nov-08		1.0 TUc	1.0 TUc		11.4	

PART 3 2008 DISCHARGE TREND CHARTS

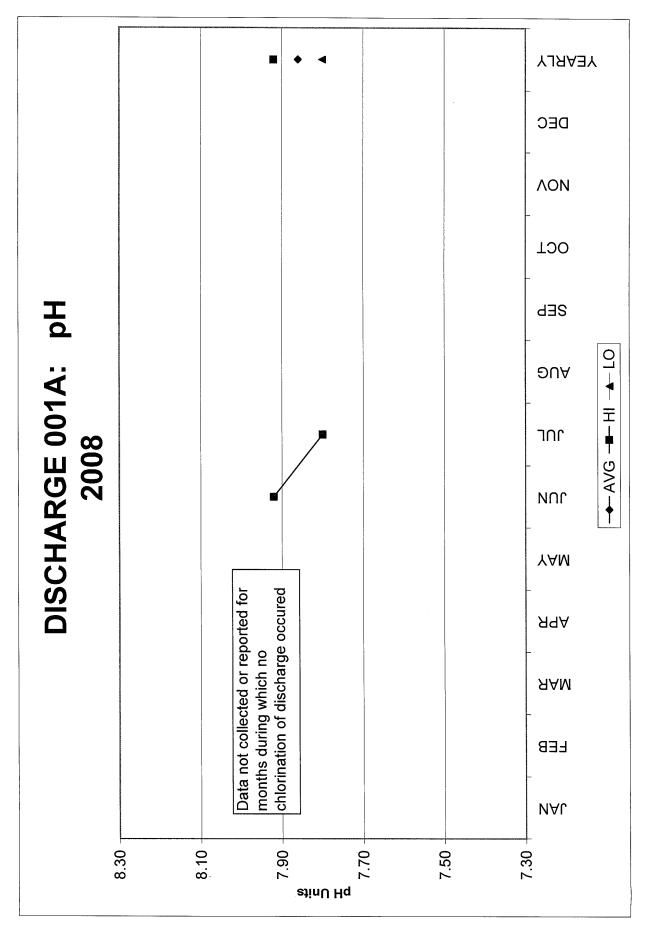




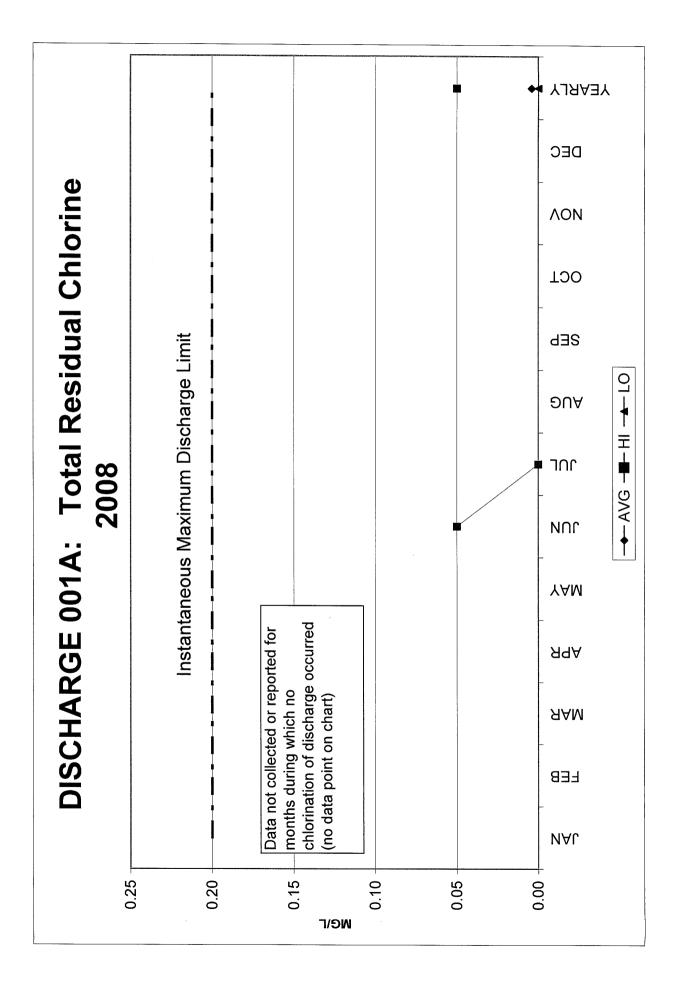




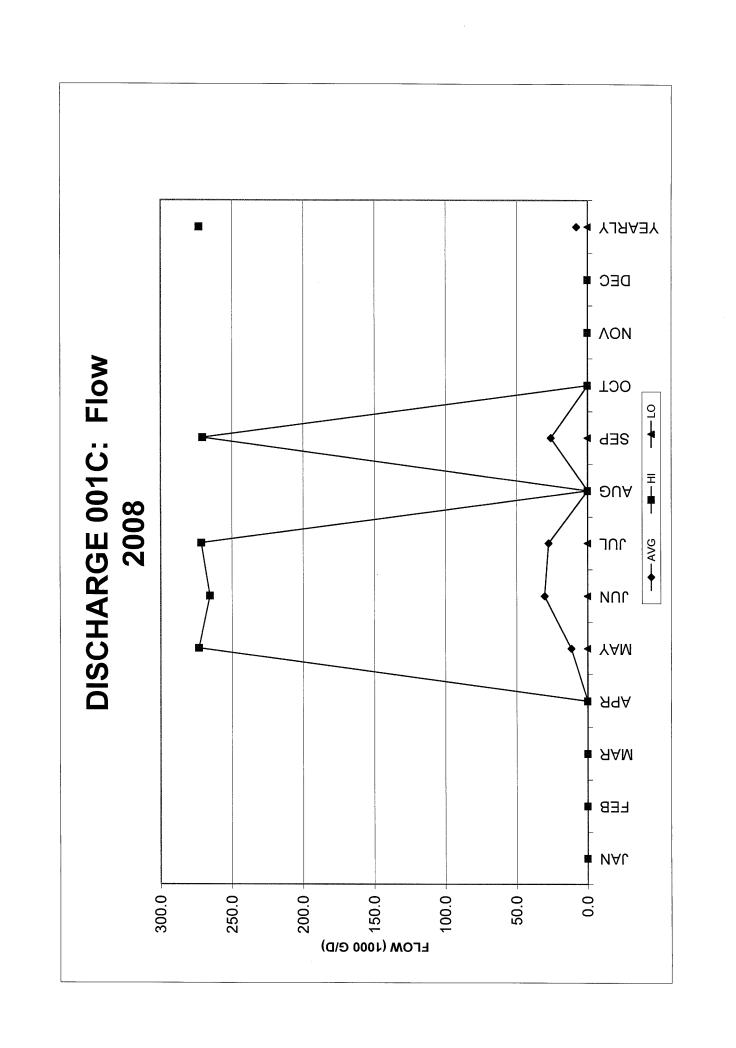
* For the month of July, no chlorination occurred. Analysis on 7/8/08 indicated a pH difference of 0.1 between intake and outfall solely due to natural variations between two distinct water bodies.

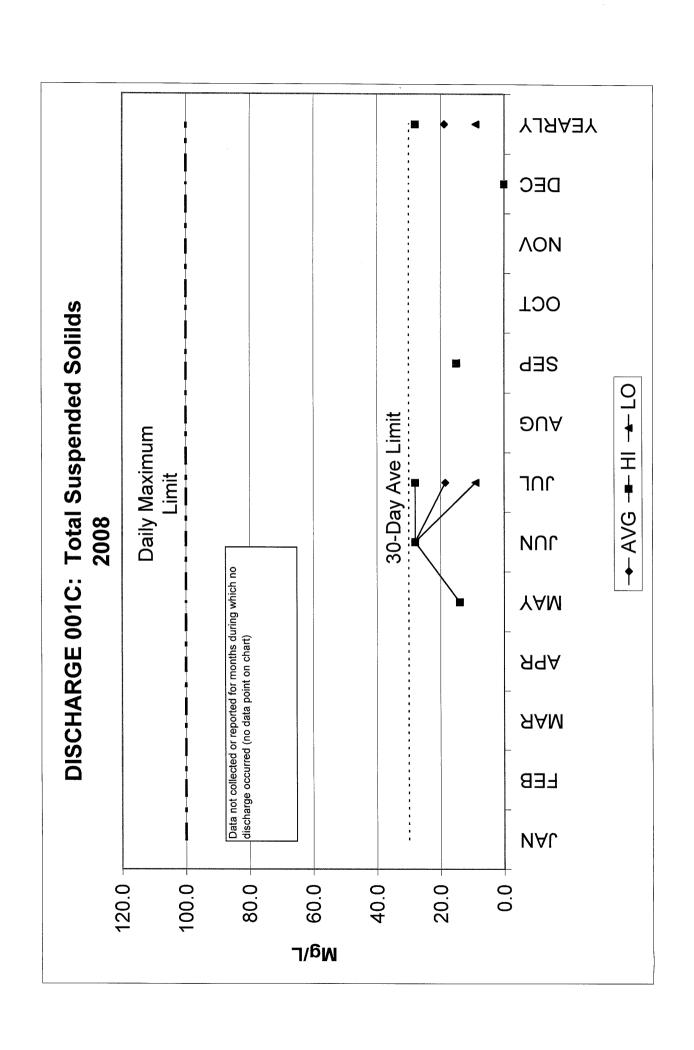


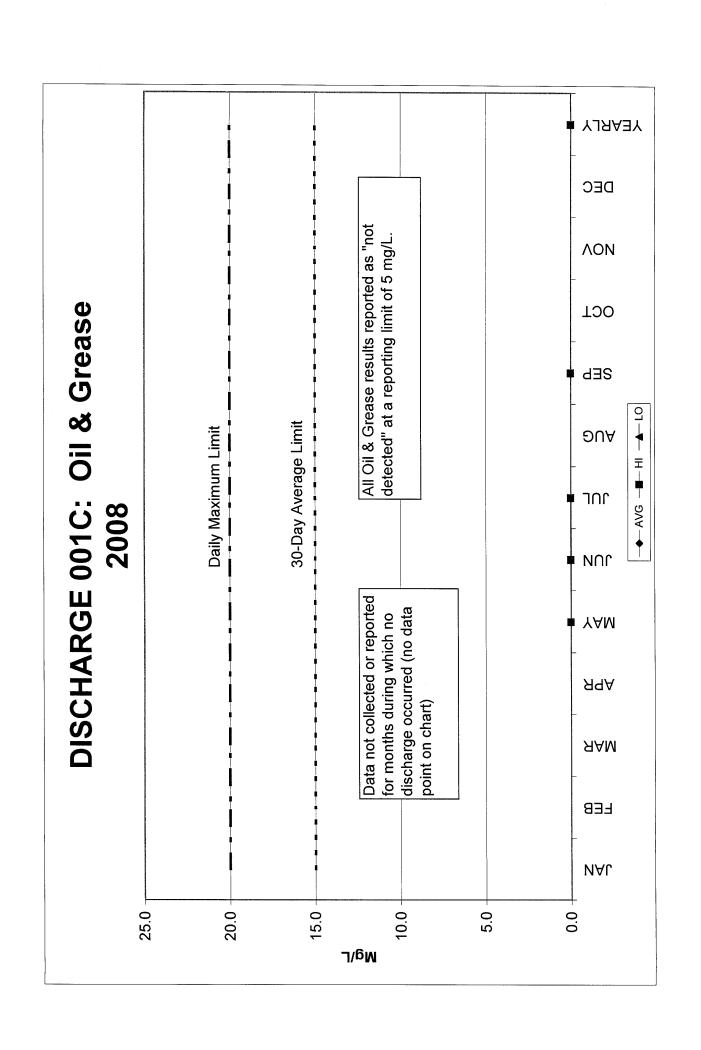
* For the month of July, no chlorination occurred. Analysis on 7/8/08 indicated a pH difference of 0.1 between intake and outfall solely due to natural variations between two distinct water bodies.

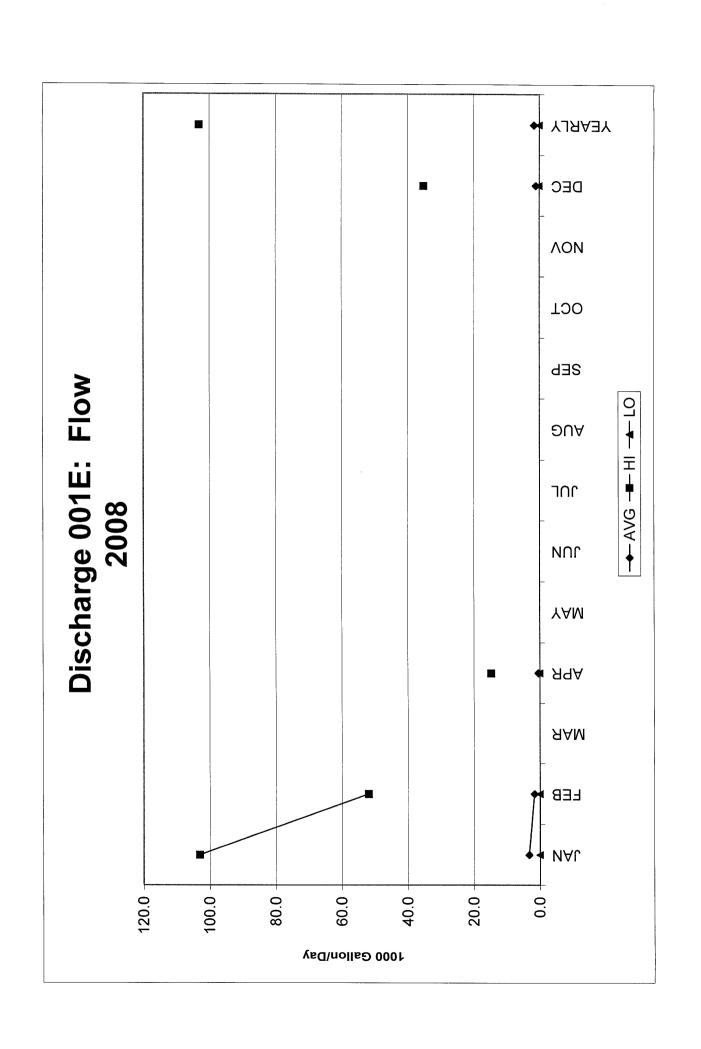


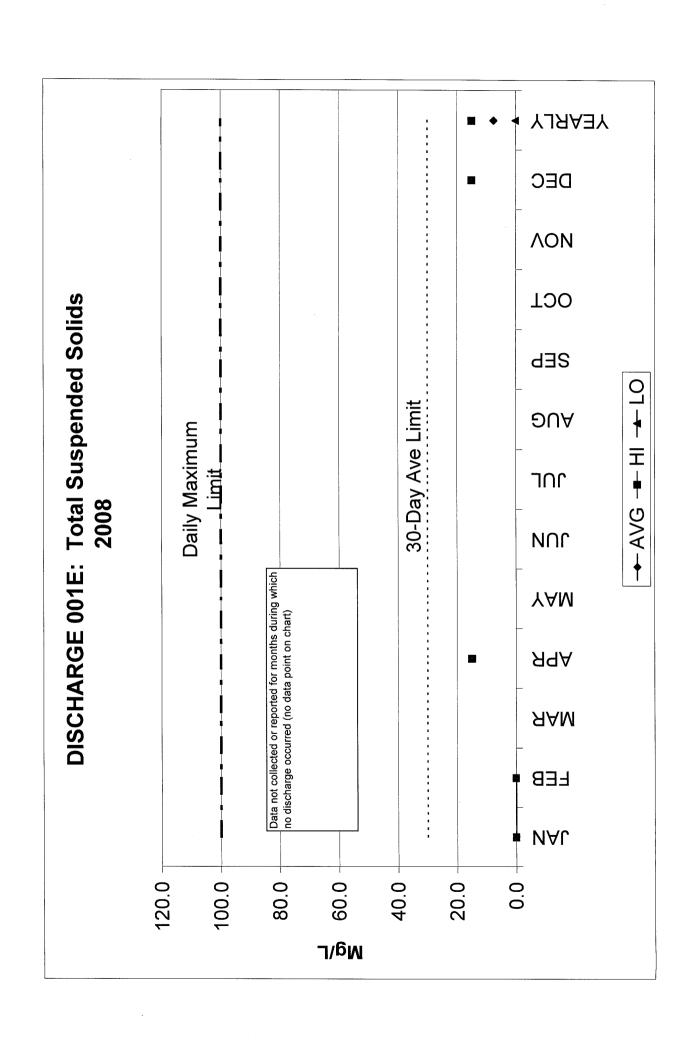
* For the month of July, no chlorination occurred. Analysis on 7/8/08 indicated no residual chlorine because chlorination did not occur.

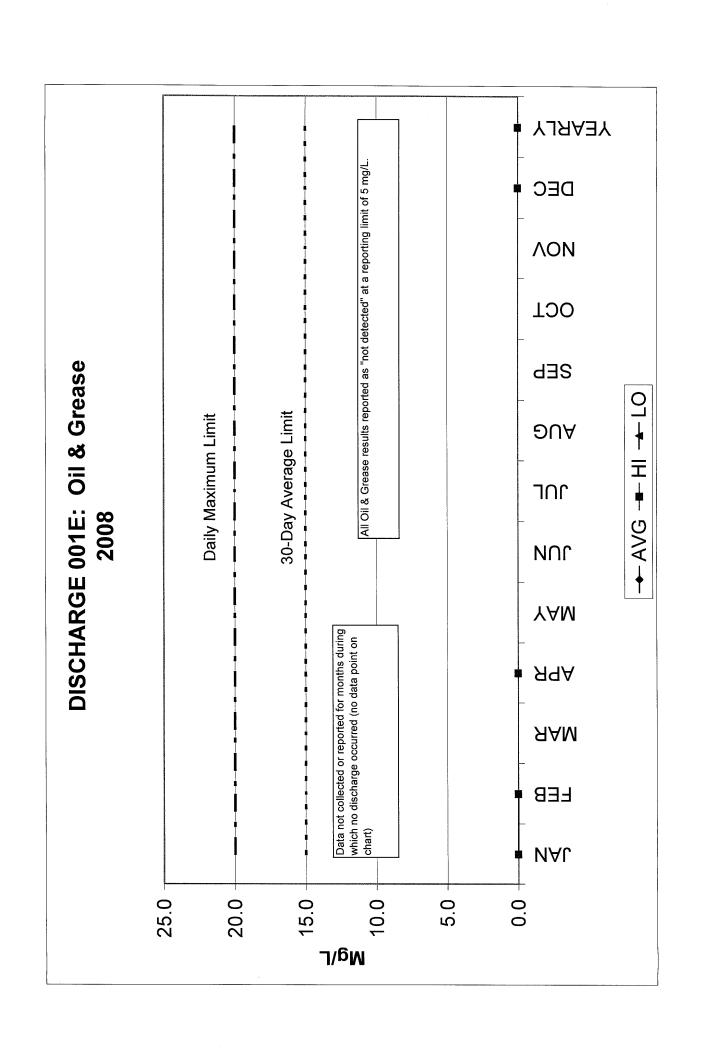


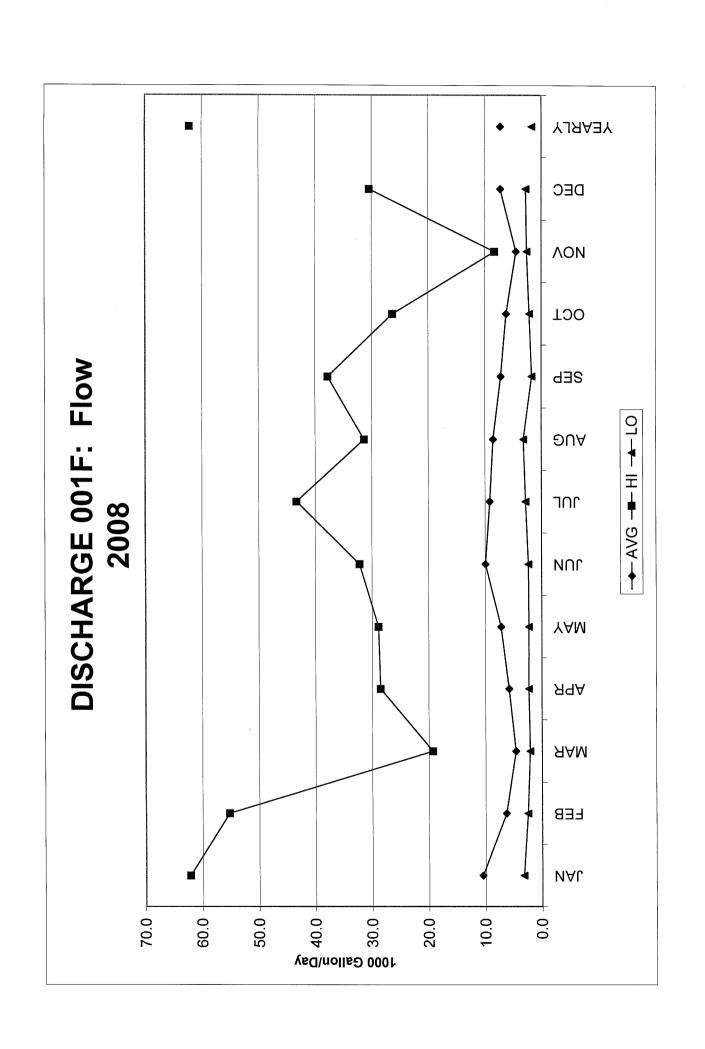


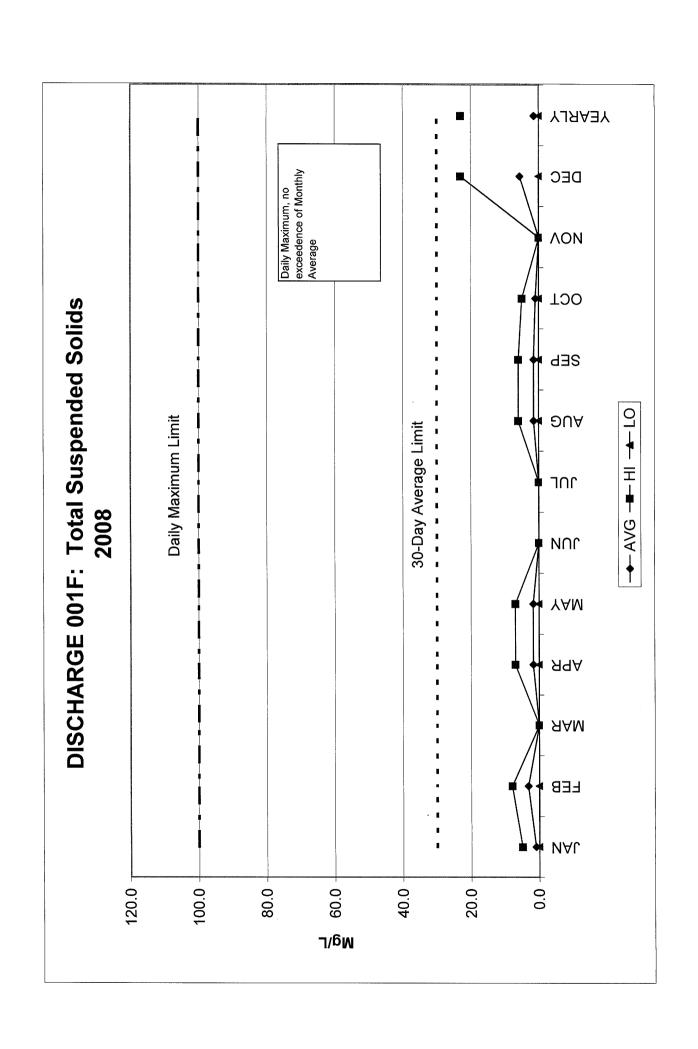


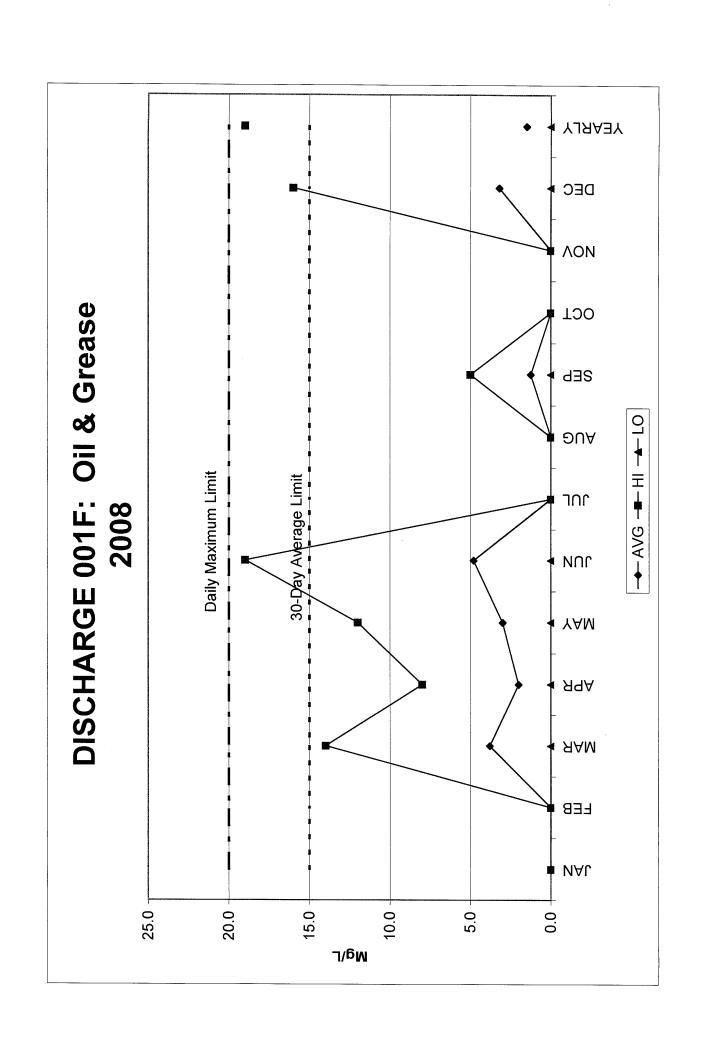












PART 4

CERTIFICATION FOR OCEAN PLAN CONSTITUENT MONITORING

Ocean Plan Constituent Monitoring

The Monitoring and Reporting provisions for Morro Bay Power Plant's NPDES permit require annual sampling for a long list of pesticides and other organic pollutants. The permit also states:

"In lieu of sampling for these constituents, the Discharger may submit certification that such constituents are not added to the waste stream, and that no change has occurred from activities that could cause such constituents to be present in the waste stream. Such election does not relieve the Discharger from the requirement to meet the limitations set forth in the permit."

A list of the required constituents from the permit is shown in the following two pages. Constituents for which this provision applies are marked with the superscript 6.

Morro Bay certifies that none of these constituents are added to the waste stream, and that no change has occurred from activities that could cause such constituents to be present in the waste stream.