

# Proposed Amendment to the OTC Policy

**Statewide Advisory Committee on  
Cooling Water Intake Structures**  
for Implementation of the Policy on the  
Use of Coastal and Estuarine Waters  
for Power Plant Cooling

*Tuesday, July 5, 2011  
Sacramento*

Dominic Gregorio.  
Division of Water Quality  
State Water Resources Control Board



# Background on the OTC Policy

- The OTC Policy is adopted by the SWRCB on May 4, 2010 under Resolution No. 2010-0020.
- The OTC Policy became effective on October 1, 2010.
- The Policy is implemented through National Pollutant Discharge Elimination System (NPDES) permits.

# Background on the OTC Policy

- **LADWP requested an amendment to the Policy.**
  - **SWRCB staff noticed a proposed amendment for the LADWP facilities on October 1, 2010.**
- **The SWRCB considered the proposed amendment on December 14, 2010.**
  - **The Board tabled the amendment pending the submittal of implementation plans, and early review by SACCWIS of DWP plans.**

# Background on the OTC Policy

- SWRCB staff sent letters to all generators (including LADWP) on November 30, 2010 notifying them to submit implementation plans.
- SWRCB staff held a stakeholder meeting on February 7, 2011 to address questions on the implementation plans.
- LADWP and other generators submit their implementation plans by April 1, 2011.

# **Grid reliability and SACCWIS**

- **CAISO and LADWP submitted grid reliability reports by December 31, 2010.**
- **Inter-Agency Working Group has continued to meet since the OTC Policy was adopted**
- **The first meeting of SACCWIS was held on April 8, 2011.**
  - **Grid reliability reports presented**
  - **MOA signed**

# LADWP Implementation Plan

- LADWP implementation plans for their three OTC facilities (Haynes, Harbor, and Scattergood), requests:
  - extended deadlines for some units
  - proposed to meet the deadlines earlier for other units.
  - commits to ultimately eliminating OTC and seawater intakes for all units
  - mitigating interim impacts to the extent possible.

# **Current LADWP Proposed Amendment**

- **SWRCB staff noticed a proposed Policy amendment with special provisions for the LADWP facilities on May 17, 2011.**
- **The Notice, Proposed Amendment, and Draft Staff Report have been posted on the SWRCB's web site.**
- **Public Comments are due today, July 5, 2011.**

# **Current LADWP Proposed Amendment**

- **SWRCB staff has discussed LADWP's implementation plans with the Inter-Agency Working Group, May - June 2011.**
- **The SWRCB is scheduled to consider the amendment for adoption on July 19, 2011.**
- **If adopted, the amendment will need to be approved by OAL.**

# Summary of the OTC Policy Amendment

Based upon its review, SWRCB staff proposes to amend the compliance deadlines for the LADWP plants found in Table 1 in Section 3.E of the Policy as follows:

Harbor GS Unit 5	12/31/2031 (previously 12/31/2015)
Haynes GS Units 1 and 2	12/31/2027 (previously 12/31/2019)
Haynes GS Units 5 and 6	<b>12/31/2013</b> (previously 12/31/2019)
Haynes GS Unit 8	12/31/2035 (previously 12/31/2019)
Scattergood GS Units 1 and 2	12/31/2024 (previously 12/31/2020)
Scattergood GS Unit 3	<b>12/31/2015</b> (previously 12/31/2020)

yellow font indicates accelerated re-powering without OTC

# Summary of the OTC Policy Amendment

The amendment would also add a paragraph to Section 2.C of the Policy that would impose **special interim requirements for any** fossil-fueled power plant with a compliance plan that extends beyond **December 31, 2020**:

- The owner or operator must commit to eliminating the use of OTC for all units at the facility.
- The owner or operator would be required to conduct studies, to evaluate new technologies or improve existing technologies to reduce impingement and entrainment.
- The results of the studies and a proposal to minimize entrainment and impingement must be submitted to the Chief Deputy Director for approval no later than December 31, 2015.
- Implementation of the proposal must be completed no later than December 31, 2020.

# Questions?

