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*

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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.
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: 12/31/2013 (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: 12/31/2015 (previously 12/31/2020)

Yellow font indicates accelerated re-powering without OTC.
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?