California Regional Water Quality Control Board
San Diego Region

DRAFT ERRATA

to the

June 27, 2012 PUBLIC RELEASE DRAFT

of the

WASTE DISCHARGE REQUIREMENTS FOR
SAN DIEGO GAS AND ELECTRIC COMPANY
PALOMAR ENERGY CENTER

Tentative Order No. R9-2012-0015
NPDES NO. CA0109215

ERRATA AS OF
September 5, 2012

This document represents tentative errata to the June 27, 2012, release of Tentative Order No. R9-2012-0015 as of September 5, 2012. The errata represent minor clarifications, reference mistakes, and updates identified by the San Diego Water Board Staff and/or in the response to comments on the public release of Tentative Order.

Changes for the June 27, 2012 Public Release Draft as of September 5, 2012

1. **Order Section II.A, page 4**

   The last sentence in paragraph 1 will be revised as follows:

   The ROWD was deemed complete on ~~December 13, 2011~~ **January 13, 2012**.

2. **Order Section IV.A.1.a, page 11**

   The maximum daily limitations for Total Residual Chlorine were incorrectly placed as instantaneous minimum limitations in Table 7. In addition, footnote no. 1 has been revised. All other parameters in Table 7 remain unchanged. Table 7 and footnote 1 have been modified as follows:

Parameter	Units	Effluent Limitations				
		6-Month Median	Average Monthly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
WATER QUALITY BASED EFFLUENT LIMITATIONS (TABLE B OF THE OCEAN PLAN)						
Total Residual Chlorine	µg/L	476	--	**1,904**	~~1,904~~	14,280
	lbs/day[1]	4.4	--	**17.5**	~~17.5~~	131

[1.] Based on the highest ~~observed 30-day~~ **reported** average **monthly** flow of 1.1 MGD. **Mass-based effluent limitations may be adjusted for an increased flow rate of up to 1.4 MGD in accordance with the provisions of 40 CFR 122.45(b)(2)(ii) by the San Diego Water Board upon receipt of the Anticipated Increase Production Notification specified under Attachment E, Section IX.B of this Order.**

3. Attachment E – Monitoring and Reporting Program, page E-9

   The first sentence of paragraph 5 will be modified as follows:

   5. Compliance Determination. Compliance with effluent limitations for reportable pollutants shall be determined using sample reporting protocols defined above and **in Section VII and** Attachment A of this Order.

4. **Attachment E – Monitoring and Reporting Program, page E-11**

   The monitoring frequency for Total Residual Chlorine has been changed from monthly to weekly. The monitoring frequency and units for Total Suspended Solids have been revised in Table E-2. All other parameters in Table E-2 remain unchanged. Footnote No. 4 has been removed and remaining footnotes will be renumbered accordingly.

   Table E-2 has been modified as follows:

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Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Free Available Chlorine	µg/l	Grab	~~1/Month~~[4] **Weekly**	[2]
	lbs/day[3]	Calculated		
Total Residual Chlorine	µg/l	Grab	~~1/Month~~[4] **Weekly**	[2]
	lbs/day[3]	Calculated		
Total Suspended Solids	~~µg/l~~ **mg/l**	24-hr composite	~~2/Year~~ **Monthly**	[2]
Zinc, Total Recoverable	mg/l	24-hour composite	2/Year	[2]
	lbs/day[3]	**Calculated**		

~~4. The minimum sampling frequency for this constituent may be reduced from monthly to quarterly upon six consecutive monitoring results in compliance with the respective effluent limitations. If at any time there is an exceedance of the respective effluent limitation, the minimum sampling frequency shall be reduced to monthly.~~

5. Attachment E- Monitoring and Reporting Program, page E-3, and Attachment F, Fact Sheet, page F-21

All references to the California Toxics Rule (CTR) in Footnote's 5 and 6 on page E-3 and Section IV.C.4.e on page F-21 have been removed and replaced with a reference to Appendix A of 40 CFR 423.15, which is more applicable for a discharge from a power plant to the ocean.

6. Attachment E – Monitoring and Reporting Program, page E-7

The following paragraph will be added as IX.B

B. Anticipated Increase Production Notification

The Discharger shall notify the San Diego Water Board at least 2 business days prior to a month in which the Discharger expects to operate at an increased energy output production level which will result in cooling tower blowdown flow in excess of 1.1 MGD. The notice shall specify the anticipated increased energy output production level, respective flows (not to exceed 1.4 MGD) and the period during which the Discharger expects to operate at the alternate level. If the notice covers more than one month, the notice shall specify the reasons for the anticipated energy output production level increase. New notice of discharge at alternate levels is required to cover a period or production level not covered by prior notice or, if during two consecutive months otherwise covered by the notice, the production level at the facility does not in fact meet the higher level designated in the notice. The Discharger shall comply with the mass-based effluent limitations based on 1.1 MGD unless the Discharger has notified the San Diego Water Board of the increase in energy output production.

The Discharger shall submit, with the DMR and SMR, the level of energy output production that actually occurred during each month and the mass-based effluent limitations applicable to that level of production.

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7. Attachment F, Fact Sheet, page F-11

In compliance with 40 CFR sections 122.45(f) and 40 CFR Part 423.15, mass-based limitations have also been established in the Order for conventional, nonconventional, and toxic pollutants. ~~Pursuant to~~ 40 CFR 122.45(b)(2)(i) specifies mass-based limitations ~~are~~ **shall be** based upon a reasonable measure of actual production of the facility rather than upon the design production capacity. **Section 122.45(b)(2)(ii) specifies the San Diego Water Board may include conditions establishing alternate permit limitations, standards, or prohibitions based upon anticipated increased production levels.** Mass-based limitations for low volume waste have been established on the maximum discharge flow rate of 0.32 MGD. Review of historical effluent data for low volume wastes indicates that, between January 2008 and September 2011, flows fluctuated above and below the design flow of 0.32 MGD but generally stayed within the design flow. Mass-based limitations for the cooling tower blowdown have been established based on the highest observed 30-day average flow, between January 2008 and September 2011, of 1.09 MGD. For the purposes of calculating mass-based limitations the highest observed flow was rounded up to 1.1 MGD. **In addition, this Order contains alternative mass-based effluent limitations based on a maximum flow of 1.4 MGD to account for anticipated increased energy output production levels at the facility.**

8. Attachment F, Fact Sheet, page F-22

Table F-11 has been modified as follows:

Parameter	Units	Effluent Limitations				
		6-Month Median	Average Monthly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
WATER QUALITY BASED EFFLUENT LIMITATIONS (TABLE B OF THE OCEAN PLAN)						
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	lbs/day[1]	4.4	--	**17.5**	~~17.5~~	131

9. Attachment F, Fact Sheet, page F-33

Section VI.B.1 has been modified as follows:

Effluent monitoring is required to determine compliance with the permit conditions and to identify operational problems. Effluent monitoring requirements include monitoring for priority pollutants **(as listed in Appendix A of 40 CFR 423.15 and included in Attachment H of this Order)** in addition to monitoring for Ocean Plan Table B Parameters. ~~CTR~~ **P**~~p~~riority pollutant monitoring for cooling tower blowdown is needed because USEPA effluent limitation guidelines (ELGs) are specific to priority pollutants **listed in Attachment A of 40 CFR 423.15** and not Table B Parameters. Because the discharge ~~in not to an inland surface water to which the CTR is applicable, and is a discharge~~ is to the Pacific Ocean to which the Ocean Plan is applicable, monitoring requirements have been added to ~~be specific for~~ **obtain** the necessary information to conduct an RPA pursuant to the requirements of the Ocean Plan.