

From: Chiara Clemente [<mailto:CClemente@waterboards.ca.gov>]
Sent: Thursday, April 17, 2008 9:48 AM
To: pmaclaggan@poseidon1.com
Cc: Brian Kelley; David Barker; Deborah Woodward; Mike McCann
Subject: Poseidon's CDP Plan - questions regarding IM & E assessments

Dear Mr. MacLaggan,

After discussing the issue with Debbie Woodward, we thought that perhaps a meeting isn't necessary to obtain the clarifications we need to proceed with our analysis. Rather, it would be most helpful if you, or your consultant(s), could confirm/clarify a couple aspects of the entrainment and impingement assessments in the Flow, Entrainment and Impingement Minimization Plan (March 6, 2008) via e-mail, in the next couple of days. Please see below.

1. ENTRAINMENT

Based on our review of the entrainment assessment in the Plan, it appears that the assessment...

(a) characterizes larval concentration in entrained water using in-plant samples, i.e., two, 24-hour samples collected near the CDP intake in the EPS discharge stream on June 10, 2004 and May 19, 2005;

(b) characterizes larval concentration in source water using source water samples, i.e., thirteen, 24-hour sample events per station collected at four lagoon (L1-4) and five nearshore (N1-5) stations, monthly from June 10, 2004 through May 19, 2005;

(c) does not draw upon the monthly samples taken in the lagoon near the entrance to the EPS intake structure (station E1); and,

(c) therefore, is for CDP/EPS co-operation rather than CDP stand-alone operation.

Is this understanding correct? Do you concur that the entrainment assessment provided in the Plan is for co-operation rather than stand-alone operation?

2. IMPINGEMENT

Based on our review of the impingement assessment in the Plan, it appears that the daily biomass of impinged fish (0.96 kgs/day) may have been incorrectly calculated.

(a) Attachment 2 appears to present counts and weights of impinged organisms found during each of the 24-hour sample events conducted weekly from June 24, 2004 through June 15, 2005, i.e., 52 sample events, each representing 24-hour impingement;

(b) Table 5-1 appears to present - not annual count and weight totals prorated to 304 MGD as indicated by the caption - but rather line totals (by taxa) of the counts and weights from Attachment 2, i.e., Table 5-1 appears to present 52-day totals with no adjustment for flow

on the day of sampling, no interpolation for the days between sample events, and no prorating to 304 MD; and,

(c) therefore, calculation of the daily biomass of impinged fish by dividing the un-interpolated, un-prorated Table 5-1 total weight (351,672 grams) by 365 days appears to be in error.

Is the above staff interpretation correct? If not, then could you please let me know which of the above statements regarding Attachment 2 and/or Table 5-1 is wrong, and why?

Thank you for your time and attention on this matter,

Chiara

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