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DIVISION OF WATER QUALITY

DYNEGY MOSS LANDING, LLC
Moss Landing Power Plant
PO BOX 690.
MOSS LANDING CA 95039
831-633-6700

March 9, 2018

Michael A.M. Lauffer, Chief Counsel
State Water Resources Control Board
1001 I Street, 22nd Floor
Sacramento, CA 95814-2828

Philip Isorena
Chief of the NPDES Unit
State Water Resources Control Board
Division of Water Quality, 15th Floor
1001 I Street
Sacramento, CA 95814

Re: Annual Update for 2017 Pursuant to Settlement Agreement between SWRCB and Dynegy regarding Once-Through Cooling Water Policy

Dear Messrs. Lauffer and Isorena:

Dynegy Moss Landing, LLC (Dynegy Moss Landing) submits this annual update for calendar year 2017 pursuant to paragraphs 2.1.6.c and 2.1.7.e of the Settlement Agreement and Release Regarding Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling Between State Water Resources Control Board (SWRCB) and Dynegy (Settlement Agreement), as executed on October 9, 2014.

Paragraph 2.1.7.e of the Settlement Agreement provides that Dynegy Moss Landing will provide the SWRCB with updates annually, as described in paragraph 2.1.6.c, on its implementation of the Policy. Paragraph 2.1.6.c of the Settlement Agreement, in turn, specifies that Dynegy Moss Landing will provide the SWRCB with an annual update on the status of (1) operational or other supplemental measures undertaken in the previous calendar year to reduce entrainment or impingement mortality, and (2) any studies undertaken in the previous calendar year to determine compliance options to meet Track 2 requirements.¹

In March 2015, Dynegy Moss Landing started entrainment and impingement sampling at the MLPP in accordance with the proposed Monitoring Plan for Impingement Mortality and Entrainment (Dec. 10, 2014) as was submitted to the SWRCB. Two years of impingement

¹ Due to an inadvertent oversight, this annual report for 2017 was not submitted by March 1.

and entrainment sampling concluded on March 23, 2017. See Table 1 below for all sampling dates in 2017. The Impingement Mortality and Entrainment Monitoring Report was submitted to the SWRCB and the CCRWQCB on September 21, 2017. The SWRCB approved the Impingement Mortality and Entrainment Monitoring Report by letter dated Dec. 1, 2017.

Table 1 below shows the number of impingement and entrainment samples collected, by survey, in 2017. Each Survey represents a 24 hour sampling period beginning close to midday on the start date shown in the table and ending close to midday on the following day. Four consecutive impingement samples are collected each survey on a 6 hour cycle from both intake locations (Units 1&2 and Units 6&7). Impingement samples are only collected when the corresponding units are operating on the day of the pre-scheduled survey. Six consecutive entrainment samples are collected each survey on a 4 hour cycle from both intake locations. Entrainment samples are always collected at both intake locations, whether or not the intakes are operating on the day of the pre-scheduled survey. In addition, a single meroplankton sample was collected once per month using a finer mesh net. The surveys were pre-scheduled on a weekly basis from November through June (and every second week from July through October). Table rows are shaded by month.

Table 1. Impingement and Entrainment Sampling Dates in 2017				
Dynergy Moss Landing, LLC				
Survey Start Date	Impingement		Entrainment	
	1&2	6&7	1&2	6&7
1/4/2017	4	0	6	6
1/11/2017	4	0	6	6
1/19/2017	4	0	6	6
1/25/2017	4	0	6	6
2/1/2017	-	-	6	6
2/8/2017	4	0	6	6
2/15/2017	-	-	6	6
2/22/2017	4	0	6	6
3/1/2017	-	-	6	6
3/8/2017	2	0	6	6
3/15/2017	-	-	6	6
03/22/17	-	-	6	6

Weekly Entrainment

In accordance with Settlement Agreement paragraph 2.1.6.b, in 2017 Dynergy Moss Landing continued to implement operational control measures at the MLPP to reduce flow. These measures involve MLPP written operating procedures limiting the duration of circulating water pump operation during unit startup and shutdown and limiting the number of circulating water pumps in operation during various unit operating configurations at less than full utilization. Dynergy Moss Landing also reduced flow during the spring and fall entrainment and impingement seasons by taking a total of 110 days of planned maintenance outages in March, April, May and October 2017. Also, Moss Landing Units 6

and 7 were retired on December 31, 2016, which eliminated potential cooling water intake flows by 864 million gallons per day.

In addition, Dynegy Moss Landing completed the installation and use of variable speed drive controls on four circulating water pumps for Units 1 and 2 on December 16, 2016, meeting the Settlement Agreement paragraph 2.1.6 d. December 31, 2016 deadline.

In furtherance of evaluating compliance options to meet Track 2 requirements at MLPP discussed in the revised Implementation Plan submitted with the annual report on February 28, 2017, additional traveling screen flow studies were conducted in 2016 and 2017 on the present sized 5/16 inch traveling screens and will be repeated in 2018 after the 3/8 inch screens are installed. A report with results of the flow studies will be submitted when completed in 2018.

Finally, on November 14, 2017, Dynegy Moss Landing submitted to the SWRCB its Pilot Study Design Plan pursuant to section 2.1.7.c.i to evaluate and verify the effectiveness of planned supplemental control technology enhancements at reducing impingement mortality and entrainment.

If you have any questions concerning this annual update for 2017, please contact Ernie Bloecher, Environmental Manager, at 831-633-6786 or by e-mail at Ernie.Bloecher@dynegy.com.

Regards,



REX A. LEWIS
Managing Director
Moss Landing and Oakland Power Plants

ECBloecher

cc: Mr. Ken Harris, Executive Officer
California Central Coast Regional
Water Quality Control Board
Attn: Peter von Langen, PhD
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401