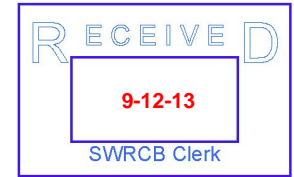




CALPINE CORPORATION

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September 11, 2013



Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, Sacramento, CA 95814

RE: Comment Letter –Draft Industrial General Permit
NPDES General Permit for Storm Water Discharges Associated with Industrial Activities
Order No.
NPDES No. CAS000001

Calpine appreciates this opportunity to comment on the “Draft Industrial General Permit”. Calpine Corporation is a major North American power company delivering clean, reliable and fuel-efficient power to its customers in 18 U.S. States. Calpine owns and operates 21 gas-fired power plants with electrical output greater than 20 MW and 17 geothermal power plants in the state of California. Calpine supports the approach that SWRCB has taken in these regulations and only has some minor comments to ease implementation at our facilities.

Calpine has comments in the following areas:

XI.B.5.b

5. Samples from each discharge location shall be collected within four (4) hours of:

- a. The start of the discharge; or
- b. The start of facility operations if the QSE occurs within the previous 12 hour period (e.g., for storms with discharges that begin during the night for facilities with day-time operating hours). Sample collection is required during scheduled facility operating hours and when sampling conditions are safe in accordance with Section XI.C.6.a.ii.

XI.C.6.a.ii

6. Sample Collection and Visual Observation Exceptions

- a. Sample collection and visual observations are not required under the following conditions:
 - i. During dangerous weather conditions such as flooding or electrical storms; or
 - ii. Outside of scheduled facility operating hours. The Discharger is not precluded from collecting samples or conducting visual observations outside of scheduled facility operating hours.

Calpine's power plant operation hours are 24 hours and the business hours are 8 am – 5 pm. The Draft Industrial General Permit (IGP) currently requires a sample to be collected during scheduled facility operating hours and within first four hours of the start of discharge. Therefore, it would be unsafe to visually observe if the discharge starts during the night. To ensure the safety of our employees, Calpine recommends adding to section XI.B.5.b "during daylight hours within scheduled facility operating hours" or adding to section XI.C.6.a.ii "during nighttime hours for 24hr operating facilities".

XII.D.4.b.iii

b. Dischargers are ineligible to return to baseline status if they submit any of the following:

- i. A industrial activity BMP demonstration in accordance with subsection 2.a.iv above;
- ii. An non-industrial pollutant source demonstration; or,
- iii. A natural background pollutant source demonstration.

The draft IGP does not allow a discharger to return to baseline status if a natural background pollutant source demonstration is submitted. Therefore, a discharger will always maintain a Level 2 and must submit a Level 2 ERA provided by a QISP annually. To recreate each Level 2 ERA would be overly burdensome, repetitive and not cost effective.

Thank you for the opportunity to comment and for your consideration of our comments and suggestions. If you have any questions or require more information, please contact me at 925-570-0849.

Sincerely,



Barbara McBride
Director, Environmental Services
Calpine Corporation