



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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March 12, 2010  
File No. 32-11.01-00

Felicia Miller, Project Manager  
California Energy Commission  
1516 Ninth Street  
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<b>DOCKET</b>
<b>08-AFC-9</b>
DATE <u>MAR 12 2010</u>
RECD. <u>MAR 15 2010</u>

Dear Ms. Miller:

## **Comments on Volume 2 of the Preliminary Staff Assessment for the Palmdale Hybrid Power Plant Project (Docket 08-AFC-9)**

The Sanitation Districts of Los Angeles County<sup>1</sup> (Sanitation Districts) appreciate this opportunity to provide comments on the Preliminary Staff Assessment for the Palmdale Hybrid Power Plant (PHPP) Project (Staff Assessment) prepared by the California Energy Commission. The Sanitation Districts own and operate 11 wastewater treatment facilities, two of which are located in the Antelope Valley region. The two facilities, the Lancaster Water Reclamation Plant (WRP) and the Palmdale WRP, are owned and operated by Sanitation District Nos. 14 and 20 of Los Angeles County, respectively. Recycled water produced by the Lancaster and Palmdale WRPs is proposed as a water supply source for the PHPP Project.

The Sanitation Districts would like to express their support for the beneficial use of recycled water for projects like the Palmdale Hybrid Power Plant. The Sanitation Districts are part of a group of stakeholders developing a Salt and Nutrient Management Plan to protect the groundwater in the region and, as indicated in the Staff Assessment, the use of the zero liquid discharge disposal method will not impact groundwater quality in the region.

The Sanitation Districts would also like to provide the following suggestions to enhance the accuracy and completeness of the Staff Assessment by clarifying information related to the Lancaster and Palmdale WRPs.

### ***Impacts to groundwater***

In the "Soil and Water Resources" Section of the Staff Assessment, references to the Lancaster and Palmdale WRPs require clarification, especially those referring to the impacts to groundwater quality as a result of treated effluent discharge. A Cleanup and Abatement Order (R6V-2003-056), a Cease and Desist Order (R6V-2004-0039) and its subsequent Amendment (R6V-2004-0039-A01) were adopted by the Lahontan Regional Water Quality Control Board, Lahontan Region (Regional Board) and issued to Sanitation District No. 20 for the Palmdale WRP. These Orders found that Palmdale WRP effluent and

<sup>1</sup> The Sanitation Districts are a confederation of 24 individual special districts serving the wastewater and solid waste management needs of over 5 million people in 78 cities and unincorporated areas of Los Angeles County.

past effluent management practices are related to nitrate exceedances found in the groundwater in the vicinity of the reuse fields, rather than a large portion of the basin. However, these orders did not make any such findings for salt or other nutrients. It should also be noted that these orders apply to the Palmdale WRP and not to the Lancaster WRP.

The following are suggested language changes in relation to groundwater impacts:

1. 1<sup>st</sup> paragraph on page 4.9-7: “...However, due to the quality of groundwater in the basin in the vicinity of the Palmdale WRP effluent reuse fields being impacted by salt, particularly nitrates, and nutrients from the Palmdale and Lancaster WRPs, the Lahontan Regional Water Quality Control Board (RWQCB) has issued orders requiring the Palmdale WRPs to cleanup and abate the salt and nutrient nitrate impacts (RWQCB2002; RWQCB2003a). As part of the abatement, †The Lancaster and Palmdale WRPs have been seeking municipal and industrial users of their treated wastewater recycled water, the use of which will help in reducing the potential for salts and nutrients to adversely impact the groundwater.”
2. 2<sup>nd</sup> paragraph on page 4.9-18: “Both the Palmdale and Lancaster WRPs are under RWQCB orders to protect beneficial uses of groundwater. These orders require the WRPs to reduce limit the amount contributions of salt and nutrients impacting to the groundwater from the WRPs (RWQCB2002; RWQCB2003a). To abate this impact, the WRPs have been disposing of the wastewater through land application and agricultural reuse. As part of their continuing abatement To reduce the potential of adverse impacts to the groundwater, the WRPs are now in the process of upgrading their facilities to allow for with activated sludge secondary and tertiary wastewater treatment of the wastewater, which will reduce the nutrient content in the recycled water produced, and encourage the use of recycled water in manners that will not adversely impact groundwater, such as subsequent sale of this wastewater for municipal and industrial uses.”
3. 3<sup>rd</sup> paragraph on page 4.9-23: “Groundwater quality in the AVGB would be favorably affected by the PHPP. The PHPP would use recycled water instead of groundwater for plant construction and operation. Although the use of recycled water would remove a potential source of groundwater recharge from the AVGB, it would also will also remove a potential source of salt and nutrient loading to the groundwater as prescribed by RWQCB orders. Past practices of land application and agricultural reuse of recycled water from the Palmdale WRPs at application rates greater than can be utilized by crops or vegetation have been found by the RWQCB to contribute to a The salt and nutrient nitrate impact loading to the groundwater in the vicinity of the Palmdale WRP effluent reuse fields from the WRPs discharges has been impacting groundwater quality. Land application and agricultural reuse above rates that can be utilized by crops or vegetation are not acceptable by the RWQCB, and as a result, †The Palmdale and Lancaster WRPs are developing alternative encouraging municipal and industrial uses for the recycled water, such as supplying the proposed PHPP with construction and process water (COPA2008a) that are not expected to adversely impact the groundwater. Staff believes the applicant’s proposed use of recycled water would reduce the potential for adverse impacts to the groundwater and may actually improve groundwater quality consistent with existing RWQCB orders.”

### ***Treatment Facilities***

In Table 6 of the “Soil and Water Resources” Section, on page 4.9-21, the 2012 designed tertiary treatment capacities for the Palmdale and Lancaster WRPs are incorrectly listed as 15 mgd and 16 mgd, respectively. The correct tertiary design capacity expected for 2012 is 12 mgd for the Palmdale WRP and

18 mgd for the Lancaster WRP. In addition, it may be noted that the Lancaster WRP is already producing tertiary-treated recycled water at a capacity of 1.6 mgd.

### ***Recycled Water Use Sites***

The Palmdale WRP effluent is no longer used for land application, which implies use of recycled water at rates greater than necessary, but is now applied for agricultural reuse at agronomic rates that do not exceed crop water needs. The Piute Ponds site on Edwards Air Force Base property is not a land application use of recycled water, but rather a project to maintain Piute Ponds, a marsh-like habitat. In Figure 1 of the “Soil and Water Resources” section of the Staff Assessment, on page 4.9-38, please consider changing the labels “Palmdale Land Application & Agricultural Reuse Area” to “Palmdale Agricultural Area” and “Lancaster WRP Piute Ponds Land Application Area” to “Piute Ponds”.

### ***Sanitation District Ownership***

To clarify, Sanitation District No. 14 owns and operates the Lancaster WRP and Sanitation District No. 20 owns and operates the Palmdale WRP. In a few instances in the Staff Assessment, the District numbers are switched (e.g., 2<sup>nd</sup> paragraph on page 4.12-3). Please, consider making a global change within the Staff Assessment.

In addition, there are instances in the Staff Assessment that the Palmdale WRP is referred to as the “City of Palmdale Water Reclamation Plant” (e.g., 3<sup>rd</sup> paragraph on page 4.9-18). To clarify correct ownership, the use of “Palmdale Water Reclamation Plant” with the omission of “City of” is suggested.

### ***Recycled Water Use Requirements***

In the “Laws, Ordinances, Regulations, and Standards” sub-section of the “Soil and Water Resources” section of the Staff Assessment, we recommend adding to the State Policies list the State Recycled Water Policy that was adopted by the State Water Resources Control Board (State Board) in February 2009 as part of Resolution No. 2009-0011. The purpose of the State Recycled Water Policy is: to indicate that recycled water is safe for the approved uses; to point out that the State Board supports recycled water as a safe alternative to potable water for such approved uses; and to increase the use of recycled water by allowing streamlined permitting of recycled water use. The State Recycled Water Policy relates to the PHPP Project in that it contains the requirement for all users of water to be involved in the development and implementation of a regional Salt and Nutrient Management Plan. Zero liquid discharge as a method to prevent potential salts and nutrients from reaching the region’s groundwater may prove beneficial to the salt and nutrient management efforts.

In addition, both Sanitation District No. 14 and 20 have a Recycled Water Ordinance that will apply to the PHPP Project for the use of recycled water produced by the Sanitation Districts. The Recycled Water Ordinance was adopted to govern the permitting, enforcement, and inspection activities associated with the use of recycled water produced by the Sanitation Districts. We recommend adding these Recycled Water Ordinances to the list of local ordinances in the Staff Assessment.

### ***References***

In the “References” sub-section of the “Soil and Water Resources” section of the Staff Assessment, the following citation needs clarification because there is not a Cleanup and Abatement Order for the Lancaster WRP. The reference below is a waste discharge requirements order, not a cleanup and abatement order, and may not be relevant to the subject at hand. If the reference is still used, consider the following change:

Felicia Miller

-4-

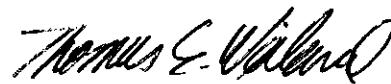
March 12, 2010

RWQCB2002 – California Regional Water Quality Control Board, Lahontan Region. ~~Cleanup and Abatement~~ Waste Discharge Requirements Order No. R6V-2002-053, Revised Waste Discharge requirements for the Los Angeles County Sanitation No. 14; Wastewater Reclamation Plant, Los Angeles County (September 25, 2002)

If you have any questions regarding these comments, please feel free to contact Erika de Hollan at (562) 908-4288, extension 2836 or by email at edehollan@lacsdsd.org.

Very truly yours,

Stephen R. Maguin



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RT:EXD:nm

cc: Gordon Phair, City of Palmdale



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**APPLICATION FOR CERTIFICATION**  
**For the *PALMDALE HYBRID***  
***POWER PROJECT***

**Docket No. 08-AFC-9**

**PROOF OF SERVICE**

*(Revised 3/2/2010)*

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**DECLARATION OF SERVICE**

I, Teraja` Golston , declare that on, March 15, 2010, I served and filed copies of the attached (08-AFC-9) Palmdale Hybrid- LA County Sanitation District – Comments on PHPP Preliminary Staff Assessment. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

**[<http://www.energy.ca.gov/sitingcases/palmdale/index.html>]**. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission’s Docket Unit, in the following manner:

***(Check all that Apply)***

**For service to all other parties:**

x  sent electronically to all email addresses on the Proof of Service list;

x  by personal delivery or by depositing in the United States mail at Sacramento, CA with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked “email preferred.”

**AND**

**For filing with the Energy Commission:**

x  sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

**OR**

depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 08-AFC-9  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.

\_\_\_\_\_  
Original Signature in Dockets  
Teraja` Golston