

TELEPHONE CONVERSATION RECORD

DOCKET	
09-AFC-2	
DATE	APR 20 2010
RECD.	APR 21 2010



Call To: <u>Victor Izzo, Senior Engineering Geologist</u>	Date: <u>04/20/10</u>
Phone #: <u>916-464-4626</u>	Time: <u>4:20</u>
Company: <u>State of California, CV RWQCB</u>	Project #: <u>1835.08</u>
	Project Name: <u>TID Almond 2 Power Plant-- Environmental Compliance</u>
Subject: <u>A2PP Treatment - CV RWQCB Permitting Requirements</u>	Completed by: <u>Vince Geronimo, PE</u>

Conversation Summary:

BACKGROUND: The existing Almond Power Plant (Turlock Irrigation District) currently uses reclaimed water for industrial cooling purposes. The water is treated on site and the waste stream delivered to the Ceres WWTP. The Ceres WWTP accepts this effluent under their existing Waste Discharge Requirements (WDR). For A2PP, TID plans to utilize the existing process for extracting reclaimed water, treating it on-site and discharging effluent to Ceres WWTP. The effluent will continue to be covered under the Ceres WDRs. TID does not have a permit for their Almond Power Plant (APP) on-site treatment.

Acting as staff for the CEC, Vince Geronimo, PWA, contacted the Central Valley RWQCB via email (see attached) for clarification on the permit requirements pursuant to the CA Water Code, Division 7, Chapter 7 – Water Reclamation. According to Article 4, Section 13523.1 of the Water Code the RWQCB may issue a master reclamation permit to a supplier or distributor of reclaimed water in lieu of issuing waste discharge requirements. The CV RWQCB has not issued WDRs to the existing APP facility for the on-site treatment process. Victor Izzo confirmed that the proposed A2PP project would not require a new permit or WDRs for onsite treatment of reclaimed water and use of recycled water. The basis for this finding is that the effluent from the treatment process is discharged to the permitted Ceres Waste Water Treatment Plant.

Follow-up / Action Items:

Revise the draft Staff Assessment

Route To: PM

Vince Geronimo

From: Vince Geronimo
Sent: Tuesday, April 20, 2010 1:19 PM
To: 'klandau@waterboard.ca.gov'
Cc: 'lwass@waterboards.ca.gov'; Paul Marshall; 'jkhela@waterboards.ca.gov'; 'Felicia Miller'; Pamela Creedon; Robin Mayer
Subject: Almond 2 Power Plant

Ken, (I also left a message with Lonnie Wass),

I am following up my voice-mail with this email to provide additional background on my inquiries. Let me first apologize for making this urgent request.

Background: The existing Almond Power Plant (Turlock Irrigation District) currently uses reclaimed water for industrial cooling purposes. The water is treated on site and the waste stream delivered to the Ceres WWTP. The Ceres WWTP accepts this effluent under their existing WDRs. TID plans to increase power production at the existing site and the new facility (Almond 2 Power Plant - A2PP) is currently being reviewed by the CA Energy Commission. TID plans to utilize the existing process for extracting reclaimed water, treating it on-site and discharging effluent to Ceres WWTP. The effluent will continue to be covered under the Ceres WDRs. TID does not have a permit for their on-site treatment.

Request: We (Energy Commission Staff) would like confirmation from the RWQCB that the proposed A2PP project would not require a permit or WDRs for onsite treatment of reclaimed water and use of recycled water.

According to Water Code, Division 7, Chapter 7, Article 4 Regulation – Section 13523.1 (see below), the RWQCB may issue a master reclamation permit to a supplier or distributor of reclaimed water in lieu of issuing waste discharge requirements.

TID has contacted Jagroop Khela, State Water Resources Control Board, Division of Water Quality, Water Recycling.

[According to a record of conversation Mr. Kehlha stated that the industrial user does not require a permit from the RWQCB for the treatment and use of recycled water. The WWTP would be responsible for notifying the RWQCB of any changes that may affect their permit \(e.g., WDRs\).](#)

I spoke with Mr. Khela yesterday and understand that the CV RWQCB should have been notified prior to making amendments to an existing permit. It wasn't until today that I found out that TID currently does not have a permit for their onsite treatment. Before we can definitively state that the proposed project complies with all applicable laws, ordinances, regulations and standards we would like confirmation that the TID A2PP project is not required to meet Section 13523.1 or that no new permit or WDR would be issued for the on-site recycled water treatment process.

This issue needs resolution in the next day (sorry again for the last minute request) so that we can proceed with publishing our staff assessment. Please FWD to anyone who might be able to respond with such short notice. There may be an opportunity to follow-up after the publication of our findings so if you are not seeing this until after 4/21/10, please assume we are still looking for support.

Thank you,
 Vince Geronimo
 916-444-9407

13523.1. Master permit requirements

(a) Each regional board, after consulting with, and receiving the recommendations of, the State Department of Health Services and any party who has requested in writing to be consulted, with the consent of the proposed permittee, and after any necessary hearing, may, in lieu of issuing waste discharge requirements pursuant to Section 13263 or water reclamation requirements pursuant to Section 13523 for a user of reclaimed water, issue a master reclamation permit to a supplier or distributor, or both, of reclaimed water.

(b) A master reclamation permit shall include, at least, all of the following:

(1) Waste discharge requirements, adopted pursuant to Article 4 (commencing with Section 13260) of Chapter 4.

(2) A requirement that the permittee comply with the uniform statewide reclamation criteria established pursuant to Section 13521. Permit conditions for a use of reclaimed water not addressed by the uniform statewide water reclamation criteria shall be considered on a case-by-case basis.

(3) A requirement that the permittee establish and enforce rules or regulations for reclaimed water users, governing the design and construction of reclaimed water use facilities and the use of reclaimed water, in accordance with the uniform statewide reclamation criteria established pursuant to Section 13521.

(4) A requirement that the permittee submit a quarterly report summarizing reclaimed water use, including the total amount of reclaimed water supplied, the total number of reclaimed water use sites, and the locations of those sites, including the names of the hydrologic areas underlying the reclaimed water use sites.

(5) A requirement that the permittee conduct periodic inspections of the facilities of the reclaimed water users to monitor compliance by the users with the uniform statewide reclamation criteria established pursuant to Section 13521 and the requirements of the master reclamation permit.

(6) Any other requirements determined to be appropriate by the regional board.

VINCE C. GERONIMO, PE, CFM

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