

## DOCKETED

<b>Docket Number:</b>	12-AFC-03
<b>Project Title:</b>	Redondo Beach Energy Project
<b>TN #:</b>	201637
<b>Document Title:</b>	Report of Conversation with LA RWQCB
<b>Description:</b>	Conversation between A. Abulaban & C. Owens LA RWQCB
<b>Filer:</b>	Teraja Golston
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	2/5/2014 10:18:24 AM
<b>Docketed Date:</b>	2/5/2014

**CALIFORNIA ENERGY COMMISSION**  
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*Siting and Environmental Protection Division*

**FILE: (2012-AFC-03)**

**PROJECT TITLE: Redondo Beach Energy Project**

<input type="checkbox"/> <b>Telephone</b>		<input type="checkbox"/> <b>Meeting Location:</b> Email exchange
<b>NAME:</b> Abdel-Karim Abulaban	<b>DATE:</b> 2/4/2014	<b>TIME:</b> 8:25 a.m.
<b>WITH:</b> Cassandra Owens, LA RWQCB		
<b>SUBJECT:</b>		

**Background:** In the RBEP application for certification the applicant stated the proposed project would have a retention basin to collect non-contact storm water, storm water that falls within process equipment after it is processed in an oil/water separator, and reject water from the reverse osmosis system to be discharged to the ocean. Staff was wondering if the retention basin would be regulated as a waste management unit pursuant to Title 27, because it receives briny waste from blowdown and the water treatment system in which case the Energy Commission would have an in-lieu permitting authority for the issuance of waste discharge requirements for the retention basin. Staff contacted Cassandra Owens at the Industrial Permitting Unit of the Los Angeles Regional Water Quality Control Board by phone and a subsequent e-mail message to find out. The RWQCB staff replied with an email stating that the retention basin would not be categorized as a wastewater management unit.

A copy of the chain of e-mails between Energy Commission and RWQCB staff is attached.

<b>CC:</b>	<b>Signed:</b>
	<b>Name:</b> Abdel-Karim Abulaban



**From:** Owens, Cassandra@Waterboards  
**Sent:** Tuesday, February 04, 2014 8:24 AM  
**To:** Abulaban, Abdel-Karim@Energy  
**Cc:** Hung, David@Waterboards; Mary Welch (mary.welch@pgenv.com); Siebels, Thomas@Waterboards  
**Subject:** RE: Redondo Beach Generating

Abdel-Karim,

Thanks for sharing the information and providing us an opportunity to discuss this issue with you. The regulatory vehicle that I am using for the facility is an NPDES permit. That permit regulates only the discharges from the basin into a water of the United States or to groundwater. During the permit review we will determine if the pond is lined, potentially look at the distance to groundwater, and evaluate the contaminant concentrations in discharges of wastewater from the pond. The contaminant concentrations in the wastewater discharged from the pond along with the beneficial uses of the receiving water will be used to determine the effluent limits applicable to the discharge. The Discharger is responsible for meeting those effluent limitations. As far as the NPDES permit is concerned the basin will not be categorized as a waste management unit.

I hope this helpful.

Cassandra

**From:** Abulaban, Abdel-Karim@Energy  
**Sent:** Monday, February 03, 2014 11:38 AM  
**To:** Owens, Cassandra@Waterboards  
**Cc:** Marshall, Paul@Energy  
**Subject:** RE: Redondo Beach Generating

Hello,

Thanks for the prompt response. The draft application for a WDR permit that we received along with the application for certification is attached. We would appreciate your input as to how you would regulate the retention basin so that we know what to include in our analysis. Our concern is that the retention basin is going to collect wastewater from the RO and also cooling tower blowdown water in addition to a small fraction (10%) that will be HRSG blowdown wastewater. If it were just stormwater then it would be a non-issue, but because of those streams we need to know if it would qualify as a waste management unit in which case we would have in-lieu regulatory authority.

Regards,  
Karim

*Abdel-Karim Abulaban, Ph.D., P.E., QSD/P*  
Associate Civil Engineer

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CA Energy Commission  
1516 9th St., MS 46  
Sacramento, CA 95814

Ph. 916-651-3775; Fax 916-654-3882

**From:** Owens, Cassandra@Waterboards  
**Sent:** Monday, February 03, 2014 11:27 AM  
**To:** Abulaban, Abdel-Karim@Energy  
**Subject:** Redondo Beach Generating

Hi,

I received the voicemail and would appreciate the opportunity to look at the application. At the same time I do not believe that we will regulate the pond as a Title 27 Unit in the context of the NPDES permit. I do not know of any facility that we regulate that way. However, I will look at the application once received and discuss the issue with management.

Thanks  
Cassandra

Cassandra D. Owens, Chief  
Industrial Permitting Unit  
Los Angeles Regional Water Quality Control Board  
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