

State Water Resources Control Board

DEC 20 2012

Mr. Mark J. Sedlacek
Director
Environmental Affairs
Los Angeles Department of Water and Power
111 North Hope Street, Room 1213
Los Angeles, CA 90012

Dear Mr. Sedlacek:

AGREEMENT AND CLARIFICATION ON STATE WATER RESOURCES CONTROL BOARD'S INFORMATION REQUEST TO THE LOS ANGELES DEPARTMENT OF WATER AND POWER REGARDING THE IMPLEMENTATION OF THE WATER QUALITY CONTROL POLICY ON THE USE OF COASTAL AND ESTUARINE WATERS FOR POWER PLANT COOLING

The State Water Resources Control Board (State Water Board) appreciates Los Angeles Department of Water and Power's (LADWP's) comments concerning the Information Request letter sent on July 10, 2012, and the agreement made on this requirement during the follow up Inter- Agency Working Group (IAWG) meeting on August 17, 2012. State Water Board staff would like to make clarifications to some of LADWP's concerns and statements in their November 7, 2012 letter.

An Information Request was sent to Ms. Katherine Rubin, Manager of Wastewater Quality and Compliance at LADWP on July 10, 2012 listing items required by the State Water Board pursuant to the Once-Through Cooling Policy and California Water Code section 13383. In this letter, the State Water Board mentions that a meeting would be facilitated with LADWP and IAWG to review and establish clear expectations about the information required.

On August 17, 2012, the IAWG meeting was held to review and discuss the items requested for LADWP submittal. Regarding Study 2 for "Planning Using State Energy Policy," LADWP explained that a quantitative analysis should not be done as it would provide sensitive information that could be used out of context. Furthermore, LADWP stated that it did not have the resources to commit to a quantitative analysis. The Study 2 discussion ended as an unresolved item and State Water Board staff committed to respond later if qualitative analysis would be sufficient.

On October 4, 2012, State Water Board staff, Ms. Shuka Rastegarpour, informed Ms. Katherine Rubin in a follow-up e-mail that a qualitative analysis would serve to meet the


Study 2 requirements and would appreciate all items in the Information Request, as agreed, to be submitted by the December 31, 2012 deadline.

It should be noted that the California Energy Commission (CEC) staff is still concerned and has stated that a quantitative analysis would provide better information than a qualitative analysis. According to Mr. Mike Jaske of CEC, "There won't be anything for the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) to use if LADWP doesn't do a quantitative analysis..." and added "CEC has agreed to hold this requirement until it is requested for the end of 2013 for SACCWIS to review in 2014." After further advice from IAWG, a quantitative study is not required at this time, but a quantitative analysis may be valuable in the future. If a quantitative analysis is determined to be necessary based on the future advice of SACCWIS, the State Water Board will notify you at that time.

The State Water Board hopes that LADWP finds these clarifications helpful and appreciates their cooperation in complying with the State Water Board's Once-Through Cooling Policy.

Should you have any questions please feel free to contact Mr. Dominic Gregorio, Manager of the Watershed, Ocean and Wetlands Section, at (916) 341-5488 (dgregorio@waterboards.ca.gov), or Dr. Maria de la Paz Carpio-Obeso, Chief, Ocean Unit, at (916) 341-5858 (marpio-obeso@waterboards.ca.gov).

Sincerely,



Thomas Howard
Executive Director