

DYNEGY MOSS LANDING POWER PLANT

**RENEW WASTE DISCHARGE
REQUIREMENTS FOR HAZARDOUS WASTE
SURFACE IMPOUNDMENTS**

ORDER NO. R3-2009-0049

Central Coast
Regional Water Quality Control Board
August 31, 2009 Meeting

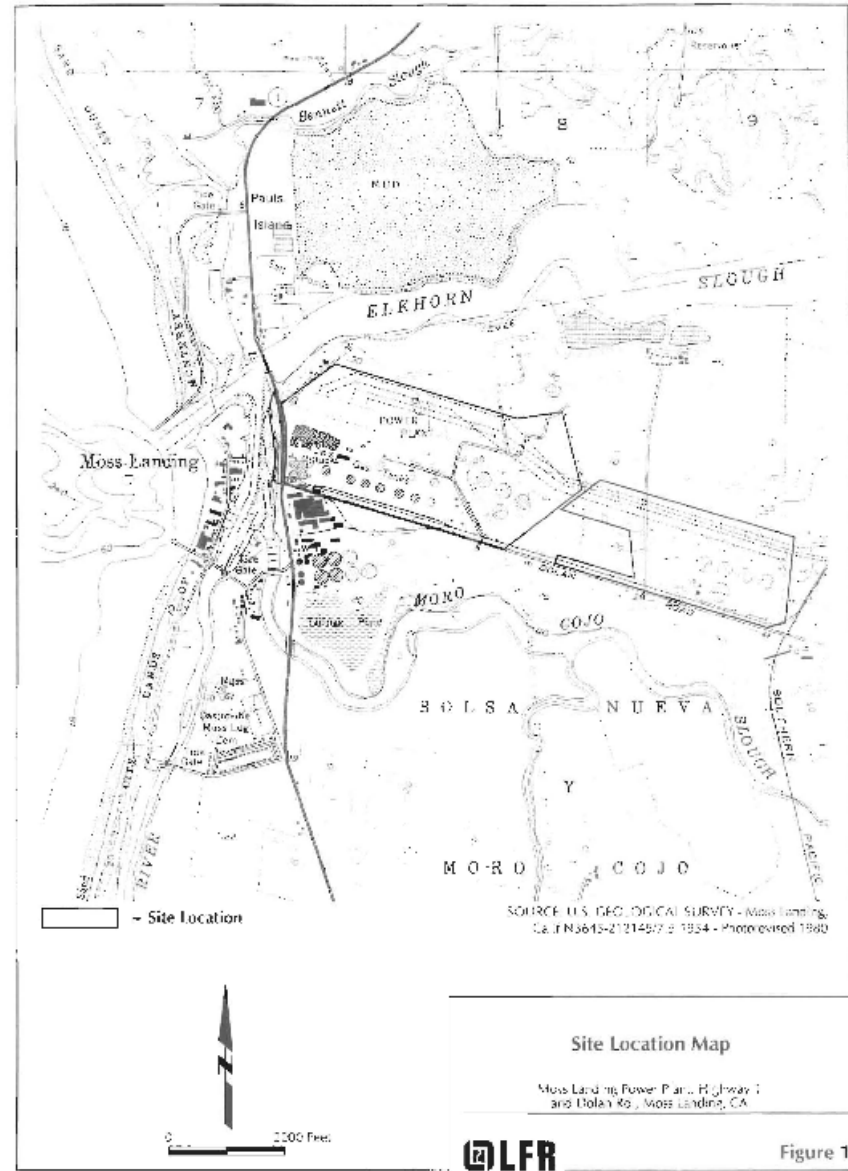
David Schwartzbart, PG, CHG Site Cleanup Program



POWER PLANT

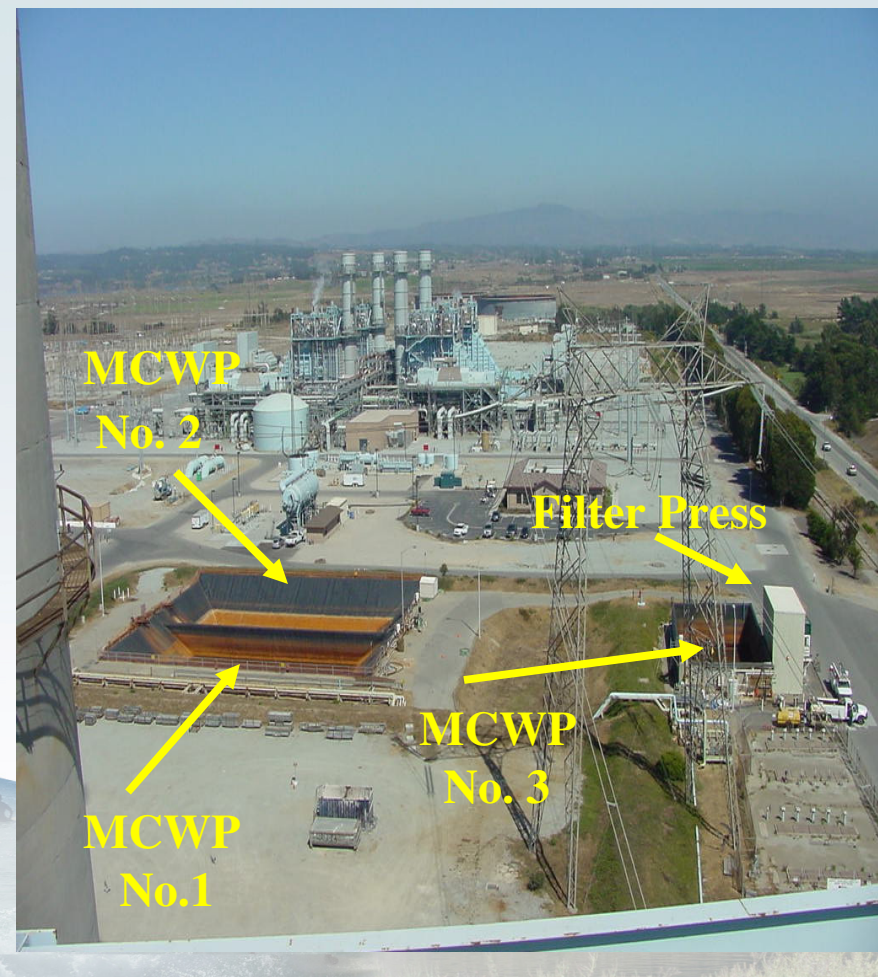
- Owned by Dynegy Moss Landing, LLC.
- In Moss Landing, at Hwy 1 and Dolan Rd.
- Fossil fuel fired.
- Plant operating since late 1960s.
- Ponds operating and permitted in current configuration since late 1980s.

Presentation focused on TPCA exemptions for three impoundments.



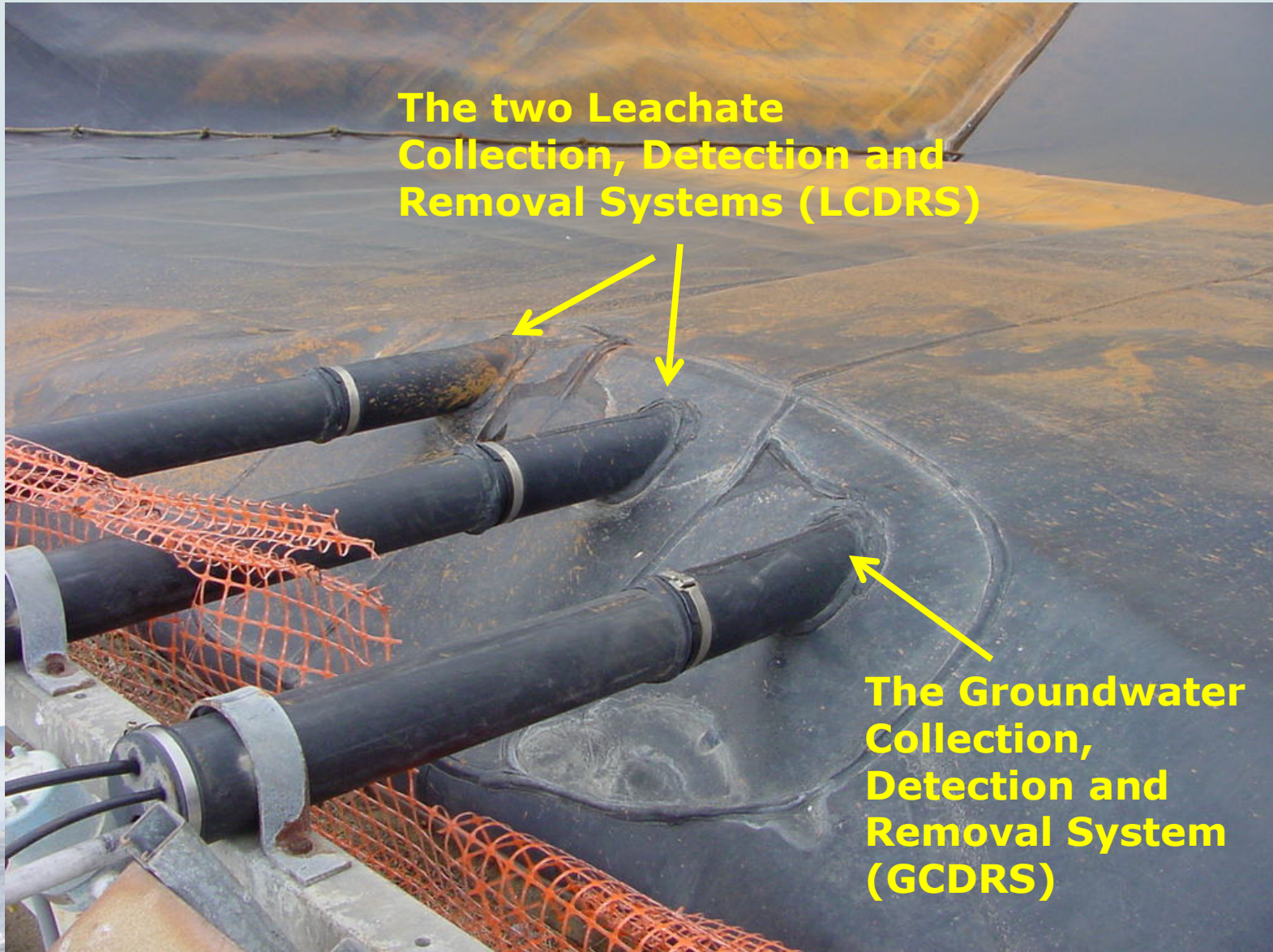
THREE HAZARDOUS WASTE (TPCA) SURFACE IMPOUNDMENTS METAL CLEANING WASTE PONDS (East View)

- Treat/store wastewater from episodic cleaning, hazardous because of elevated metals and low/high pH.
- Treatment by pH adjustment and precipitation.
- Clean supernatant pumped to cooling water system and discharged to surface water, per NPDES permit.
- Sludge disposed offsite.
- Ponds are small (see truck).

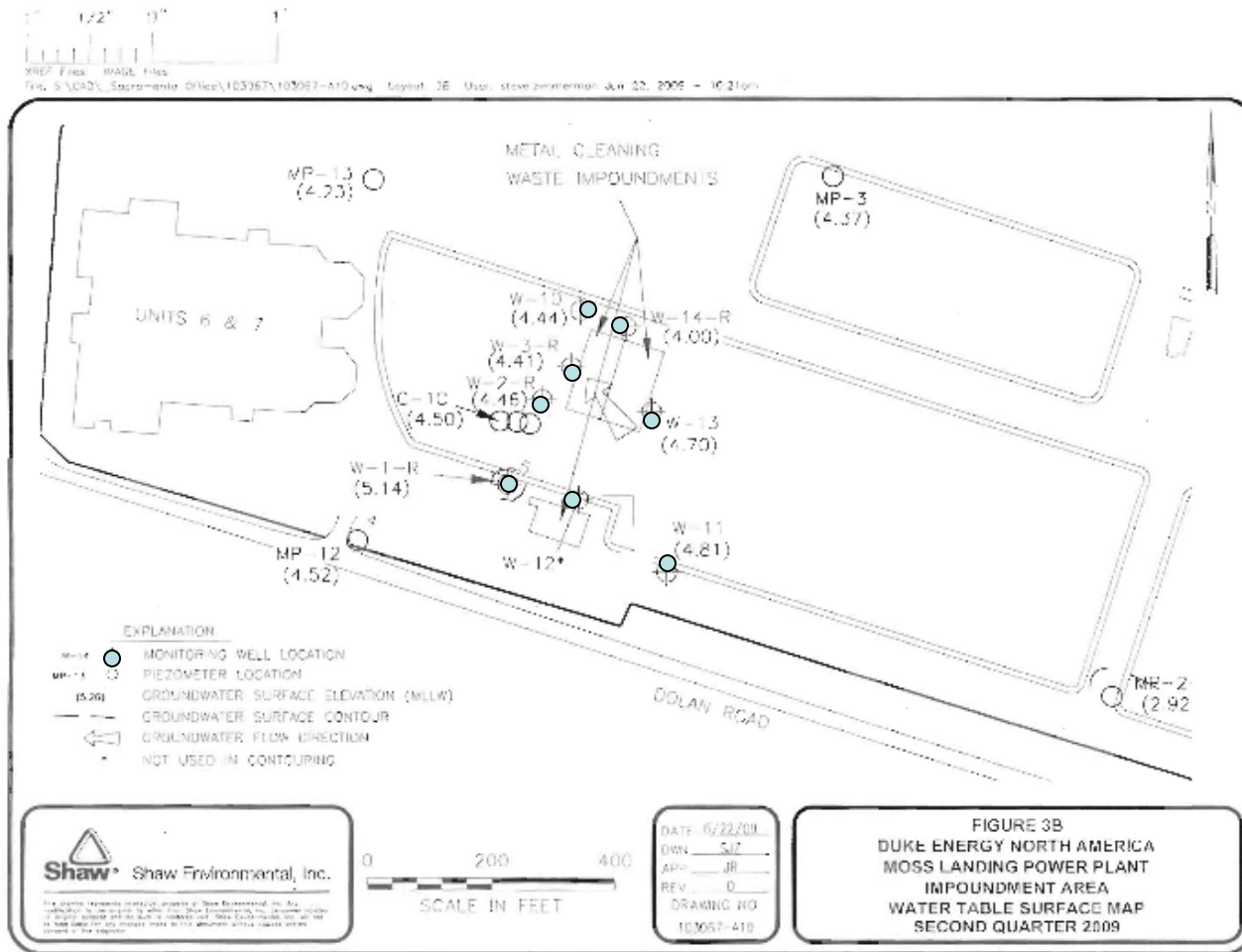


TRIPLE BOTTOM LINERS

(No wastewater in LCRS)



MONITORING (GW, LCRS, LINER, ETC.)



PERMITTING

- Resource Conservation & Recovery Act/ California Code of Regulations (CCR) Title 22
- CCR Title 23, redundant except Toxic Pits Cleanup Act of 1984 (TPCA) exemptions.
- TPCA:
 - Prohibits subject ponds unless exempted by Water Board.
 - Water Board must make findings to grant exemptions.
 - Renewable exemptions last 5 years and current TPCA exemptions expire October 22, 2009.



WATER BOARD FINDINGS TO RENEW TPCA EXEMPTIONS

- Ponds have not polluted.
- Ponds likely will not pollute.
- Wastestream does not include Extremely Hazardous Waste.
- Ponds are for temporary storage and discontinuous batch treatment.
- Restricted Hazardous Waste is removed from ponds within 30 days of discharge.
- Ponds are inspected prior to each use.
- Ponds are tested annually.
- Ponds are double lined and have LCRS.
- Groundwater is monitored.
- A Hydrogeologic Assessment Report was completed.

Above findings are satisfied.



COMMENTS RECEIVED MONTEREY COASTKEEPER

- The Monterey Coastkeeper commented public notice was deficient.
 - Water Board staff responded in Supplemental Sheet
 - Public notice was adequate.
 - September 11, 2009 meeting was noticed in June 17, 2009 newspaper publication.
 - August 31, 2009 meeting was noticed July 31, 2009.
 - Total ~2.5 months notice

COMMENTS RECEIVED MONTEREY COASTKEEPER

- The Monterey Coastkeeper commented groundwater monitoring might indicate release(s).
 - Water Board staff responded in Supplemental Sheet
 - Groundwater data, in conjunction with other data, indicate no release has occurred.

STAFF RECOMMENDATIONS:

- Make findings to renew TPCA exemptions.
- Renew TPCA exemptions for 5 years.
- Adopt WDR Order No. R3-2009-0049.



Questions?

