Message

From: Whitson, Amelia [Whitson.Amelia@epa.gov]
Sent: 9/10/2018 5:20:52 PM
To: Morris, Cris@Waterboards [Cris.Morris@waterboards.ca.gov]; Stuber, Robyn [Stuber.Robyn@epa.gov]
CC: Owens, Cassandra@Waterboards [Cassandra.Owens@waterboards.ca.gov]; Ramach, Sean [Ramach.Sean@epa.gov]; Smith, DavidW [Smith.DavidW@epa.gov]
Subject: RE: Castaic Power Plant cooling water flows

Would you be available for a call at 8am PDT next Tuesday 9/18?

From: Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
Sent: Monday, September 10, 2018 9:52 AM
To: Whitson, Amelia <Whitson.Amelia@epa.gov>; Stuber, Robyn <Stuber.Robyn@epa.gov>
Cc: Owens, Cassandra@Waterboards <Cassandra.Owens@waterboards.ca.gov>; Ramach, Sean <Ramach.Sean@epa.gov>; Smith, DavidW <Smith.DavidW@epa.gov>
Subject: RE: Castaic Power Plant cooling water flows

Amelia et al,

We are going to have to push this off until after the Board meeting. Please send us a possible time to discuss next week.

Cris

From: Whitson, Amelia <Whitson.Amelia@epa.gov>
Sent: Monday, September 10, 2018 9:47 AM
To: Robyn Stuber <Stuber.Robyn@epa.gov>; Morris, Cris@Waterboards <cris.morris@waterboards.ca.gov>
Cc: Owens, Cassandra@Waterboards <cassandra.owens@waterboards.ca.gov>; Ramach, Sean <Ramach.Sean@epa.gov>; David W. Smith <smith.davidw@epa.gov>
Subject: RE: Castaic Power Plant cooling water flows

Thank you all – I just sent an invite for a call at 11am PDT tomorrow. Please let me know if you didn't receive it. Looking forward to talking with you all tomorrow.

Kind regards,

Amelia Whitson
NPDES Permits Office (WTR-2-3)
US EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3216

From: Stuber, Robyn
Sent: Monday, September 10, 2018 8:25 AM
To: Morris, Cris@Waterboards <Cris.Morris@waterboards.ca.gov>; Whitson, Amelia <Whitson.Amelia@epa.gov>
Cc: Owens, Cassandra@Waterboards <Cassandra.Owens@waterboards.ca.gov>; Ramach, Sean <Ramach.Sean@epa.gov>; Smith, DavidW <Smith.DavidW@epa.gov>
Subject: RE: Castaic Power Plant cooling water flows

Hi Cris,

Thanks for your summary!

Both Amelia and I are continuing to familiarize ourselves with 316(b), both in general and in relation to hydroelectric. I'm hoping our conversation with Sean this week will further clarify how the facility is properly covered. Amelia will coordinate with Sean to find some call times which work for everyone. We know your Wed - Fri schedule is already full, due to this week's Board meeting.

Sincerely,
Robyn

ROBYN STUBER • 415-972-3524 • M/T/TH/F
USEPA R9 • NPDES PERMITS SECTION (WTR-2-3)
75 HAWTHORNE STREET • SAN FRANCISCO, CA 94105

From: Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
Sent: Monday, September 10, 2018 7:42 AM
To: Stuber, Robyn <Stuber.Robyn@epa.gov>; Whitson, Amelia <Whitson.Amelia@epa.gov>
Cc: Owens, Cassandra@Waterboards <Cassandra.Owens@waterboards.ca.gov>
Subject: FW: Castaic Power Plant cooling water flows

Per the language in 125.91 and the flows at the facility, the requirements for existing facilities in 125.94 through 125.94, do not apply. I believe the BPJ requirement for existing facilities that you are referring to is in 125.90:

(b) Cooling water intake structures not subject to requirements under Section 125.94 through 125.94 or subparts I or N of this part must meet requirements under section 316(b) of the CWA established by the Director on a case-by-case, best professional judgment (BPJ) basis.

So, I guess what I am looking for is the specific direction from the Director for this particular facility.

Please forward when you can. We are planning to submit the draft Tentative for review in the next few weeks.

Cris

From: Stuber, Robyn <Stuber.Robyn@epa.gov>
Sent: Tuesday, September 4, 2018 8:42 AM
To: Morris, Cris@Waterboards <cris.morris@waterboards.ca.gov>
Cc: Amelia Whitson <Whitson.Amelia@epa.gov>; Robyn Stuber <Stuber.Robyn@epa.gov>; David W. Smith <smith.davidw@epa.gov>
Subject: RE: Castaic Power Plant cooling water flows

Hi Cris,
Good question. I believe there is per Amelia's conversation with the HQ national expert for the new regulations, but I've not learned the particulars. Let's talk with Amelia this week and, if needed, arrange a call with HQ to address any questions that we here can't tackle.
Robyn

From: Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
Sent: Monday, September 03, 2018 11:15 PM
To: Stuber, Robyn <Stuber.Robyn@epa.gov>
Subject: Re: Castaic Power Plant cooling water flows

Thanks for letting me know. Where is the regulatory requirement for the BPJ analysis so I can look it up?

Cris

Sent from my iPhone

On Aug 31, 2018, at 8:48 AM, Stuber, Robyn <Stuber.Robyn@epa.gov> wrote:

> Hi Cris,
>
> I'll check with Amelia to make sure that we keep coordinating with you....
>
> As you may recall from one of our calls with Amelia, if Castaic isn't subject directly via cooling water flow, the permit still needs to include a BPJ 316(b) analysis which I'm not familiar with. When Amelia is back in the office next Tuesday, we can talk with you/Cassandra/Rosario on this. The HQ national expert is familiar with the BPJ component of the regulatory/permitting process when cooling flows don't apply, and will be a resource for us to draw upon for this permit.
>
> Hope you all have a nice long weekend!
>
> Robyn
>
> ---
>
> **From:** Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
> **Sent:** Thursday, August 30, 2018 8:02 AM
> **To:** Stuber, Robyn <Stuber.Robyn@epa.gov>; Whitson, Amelia <Whitson.Amelia@epa.gov>
> **Cc:** Owens, Cassandra@Waterboards <Cassandra.Owens@waterboards.ca.gov>; Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>
> **Subject:** FW: Castaic Power Plant cooling water flows
>
> As documented by this letter from LADWP, the Castaic Power Plant is not subject to the 316(b) requirements due to the ratio of the cooling water to the total flow being less than 25 %.

Cris Morris, PE, PMP

Watershed Regulatory Section Chief
Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Phone: (213) 620-2083
Email: crismorris@waterboards.ca.gov

From: Gomez, Edgar <Edgar.Gomez@ladwp.com>
Sent: Wednesday, August 29, 2018 4:12 PM
To: Morris, Cris@Waterboards <cris.morris@waterboards.ca.gov>
Cc: Owens, Cassandra@Waterboards <cassandra.owens@waterboards.ca.gov>; Aston, Rosario@Waterboards <rosario.aston@waterboards.ca.gov>; Rubin, Katherine <Katherine.Rubin@ladwp.com>
Subject: RE: Castaic Power Plant cooling water flows

Good afternoon Ms. Morris,

Please find attached to this email the Los Angeles Department of Water and Power's response to your request for additional information.

Should you have any questions, please feel free to contact me.

Best regards,

Edgar Gomez
Environmental Affairs | Wastewater Quality and Compliance
Los Angeles Department of Water and Power
111 North Hope Street, Room 1213
Los Angeles, CA 90012
213-367-4425 (office)
213-840-5944 (cell)

From: Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
Sent: Wednesday, August 29, 2018 9:32 AM
To: Rubin, Katherine; Gomez, Edgar
Cc: Owens, Cassandra@Waterboards; Aston, Rosario@Waterboards
Subject: FW: Castaic Power Plant cooling water flows

Katherine/Rubin,

I have updated the cooling water flow rate spreadsheet to calculate the percentage of cooling water flow versus the total flow from Elderberry Forebay and also from Pyramid Lake. We are looking at this to figure out if the CWA 316(b) requirements are applicable to this site. This spreadsheet is based on the attached flow schematic.

Based on these numbers, the percentage of flow being withdrawn for cooling purposes versus the total flow from Elderberry Forebay is less than 2 %. As a result, the applicability in 125.91 (a)(3) of greater than 25 % does not apply. Similarly, the amount of cooling water being withdrawn from Pyramid Lake is less than the 2 mgd, so the 125.91 (a)(2) does not apply.

Please confirm that the spreadsheet represents the operations at the Castaic Power Plant and that the CWA 316(b) does not apply.

Thanks much,
Cris

From: Morris, Cris@Waterboards
Sent: Friday, August 24, 2018 3:55 PM
To: Rubin, Katherine (Katherine.Rubin@ladwp.com) <Katherine.Rubin@ladwp.com>; Gomez, Edgar <Edgar.Gomez@ladwp.com>
Cc: Aston, Rosario@Waterboards <rosario.aston@waterboards.ca.gov>; Owens, Cassandra <Cassandra.Owens@waterboards.ca.gov>
Subject: Castaic Power Plant cooling water flows

Katherine/Edgar,

Could you please confirm that the total cooling water flow at the Castaic Power Plant is 14.5 mgd? I pulled the numbers from the attached figure. The spreadsheet with the breakdown is also attached.

Thanks much,

Cris Morris, PE, PMP

Watershed Regulatory Section Chief
Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Phone: (213) 620-2083
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