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January 12, 2016

Mr. Samuel Unger, P.E.
Executive Officer
California Regional Water Quality Control Board, Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

RE: Comments on the Tentative National Pollutant Discharge Elimination System Permit No. CA0001171, dated December 9, 2015

Dear Mr. Unger:

Long Beach Generation LLC (LBG), owner of the Long Beach Generating Station (LBGS), offers the following comments on the Tentative Order (TO) National Pollutant Discharge Elimination System (NPDES) Permit No. CA0001171, issued December 9, 2015. LBG is a wholly owned subsidiary of NRG Energy Inc. (NRG). LBG's current NPDES permit was issued November 9, 2009. LBG made timely submittal of a Report of Waste Discharge on April 11, 2014. LBGS has operated on the administrative extension of NPDES Permit No. CA0001171 since its expiration on October 10, 2014.

LBG Comments:

1. We request the Water Board clarify and add the "minimum level" described in footnote 9 to Table 4. LBG believes that the Effluent Limitations, Section IV. A.1.a. footnote 9 in Table 4 should match Attachment E Monitoring and Reporting Program Section IV A.1 Table 2 footnote 8.

2. The factsheet page F-34 Section VII. Rational For Monitoring and Reporting Requirements D.1. states "Receiving water monitoring requirements included Order R4-2009-0112 have been retained without modification." The current permit (Attachment E Section VIII A Table E-3) requires a minimum sampling frequency of fours (4) samples per quarter for bacteria (total coliform, fecal coliform, and enterococcus). The TO Attachment E Section VIII A. 1. Table E-4 shows the minimum sampling frequency of five (5) samples per quarter. Can the Regional Board please provide the rational for increasing the frequency by 20 percent? LBG requests the Regional Board consider the compliant historical receiving water monitoring data for bacteria and that the discharge location of LBGS is outside of the water body with a bacterial total maximum daily load (TMDL), and therefore requests that Table E-4 be revised to reflect four samples per quarter as stated in the factsheet.

3. Monitoring requirements during bypass events have been added to the Effluent Monitoring Requirements, Attachment E, Section IV A. 1. LBG provides the following description of the wastewater treatment system and requests clarification on the bypass events to be monitored. It is our position that these events do not warrant specific monitoring beyond what is already performed to characterize LBGS's discharge including the storm water contribution to the facility discharge. LBGS' routine operation includes monitoring and discharge of wastewater

that includes storm water amongst the wastewater streams. Bypass events may occur at different points in the wastewater treatment system. As described in Attachment F, Section II.A.3., in the event of extreme precipitation to avoid flooding, storm water may be diverted around the treatment system and discharged through Discharge Point 001. Storm water diversion is implemented after the retention basin (hence, all storm water receives initial treatment by settling), and prior to the waste water treatment system, which includes sodium hypochlorite addition system for ammonia removal, oil-water separation, filtration systems (sand filters and fine particulate filter bags), activated carbon for organic compound removal and residual chlorine removal, and ion exchange resins for metals removal. Diversions around the wastewater treatment system have been notified and reported as bypass events. It is worth noting that the bypassed storm water is initially settled in the retention basin at a minimum before discharge and that LBG continues to operate the waste water treatment system concurrently with the bypass during significant storm events to fully treat as much of the contributing storm water to the overall facility waste water. Hence the discharge during bypass events is a combination of fully treated waste water and water diverted around the waste water treatment system that has received settlement treatment. Storm events are difficult to predict and the decision to divert the treatment system is made only as a last resort decision to avoid facility flooding. Storm event diversion operations occur after the first flush has occurred and this first flush is amongst the fully treated waste water. The diversion is implemented just long enough to ensure that there is sufficient free board in the retention basin to accommodate continued inflow. Alternately, bypass may also occur around specific components of the wastewater treatment system due to maintenance as described by Attachment D. Section I.G.2., and/or unanticipated equipment failure.

4. Monitoring requirements during bypass events have been added to the Effluent Monitoring Requirements, Attachment E, Section IV A. 1. LBG disagrees with the added monitoring requirement for storm water diversion events which would be overly burdensome for events that are typically rare (El Nino-type circumstances),unplanned, and only last a few hours. LBG also has logistical concerns that it could not coordinate and execute an unanticipated sampling event during an unanticipated and unplanned bypass event of short duration. The bypass monitoring requirement in the TO from Table E-2 would require sampling for flow, temperature, pH, biological oxygen demand, oil and grease, total suspended solids, turbidity, settleable solids, salinity, methyl tertiary butyl ether (MTBE), total petroleum hydrocarbons (TPH) as gasoline, TPH as diesel, TPH as kerosene, bacteria (total coliform, fecal coliform, and enteroccus, ammonia, copper, lead, nickel, zinc, benzo (a) pyrene [B(a)P], chrysene, 4,4-DDT, PCBs, and the remaining Priority Pollutants. The only parameters monitored continuously or daily are flow, temperature, and pH. The rest of the parameters that would be monitored are already sampled either monthly, quarterly (coliform is currently sampled four times samples per quarter as discussed in comment #2 above), and annually; the results are characteristic of the facilities wastewater, including storm water during the wet seasons. Considering that the storm water diversions are only performed to protect property and the environment LBG requests that this requirement be removed for storm water bypass events. LBG also notes that storm water discharges subject to the Industrial General Permit NPDES No. CAS000001 (IGP) only requires monitoring of pH, total suspended solids, and oil and grease and compared to numeric action levels, not effluent limitations.

5. Monitoring requirements during bypass events have been added to the Effluent Monitoring Requirements, Attachment E, Section IV A. 1. LBG requests a change to the parameters to be monitored during bypass of treatment system components. The parameters listed in Table E-2 include parameters with effluent limitations and parameters that are only collected as data for

evaluating reasonable potential for the new discharge to cause or contribute to an exceedance of applicable water quality objectives contained in the SIP during future permit reissuances. LBG requests that the Regional Board consider only requiring monitoring of bypass events (excluding storm water bypass events) for parameters with discharge limitations. Considering that all non-permit limit parameters are collected for informational purposes and are collected routinely either monthly, quarterly, or annually, LBG believes that bypass event monitoring would not be characteristic of the treatment system discharge and hence of little value to characterizing the discharge for future permitting. Bypass events historically have included bypasses of only portions of the treatment system for maintenance procedures or breakdown repairs. In these cases the potential risk to discharge would be for parameters subject to the portion of the treatment system being bypassed and not all the parameters listed in Table E-2.

6. Monitoring requirements during bypass events have been proposed in the Effluent Monitoring Requirements, Attachment E, Section IV A. 1. Although we have provided comments, requesting these proposed monitoring be removed from consideration in this TO, LBG will request a Time Schedule Order (TSO) to establish a new monitoring point for bypass events that occur from the discharge side of the retention basin directly the outfall discharge point 001, if these requirement are included in new NPDES permit. Currently all monitoring is performed at the discharge side of the wastewater treatment system as shown in Attachment C, Wastewater Flow Schematic. LBG will require time to evaluate where and how a sampling point should be installed and develop safe procedures for monitoring at the outfall point. The new discharge location will also require a power source and instrumentation to be installed for continuous monitoring of parameters. LBG estimates that engineering evaluation, procurement, installation and training will require at a minimum 20 to 24 weeks to accomplish. LBG requests a TSO of 6 months to implement the new monitoring point.

7. LBG request rationale for the inclusion of the turbidity limitation as described in Attachment F, Section IV.C.5.f., in particular since turbidity is not evaluated in the receiving water.

We appreciate the communication of the Board staff during the evaluation of the permit application and preparation of the Tentative Permit. If you have any questions regarding these comments, please do not hesitate to contact Steve Odabashian at (310) 615-6331 or me at (760) 710-2156 (office).

Sincerely,

George L. Piantka, PE
Sr. Director, Regulatory Environmental Services
NRG Energy, West Region

cc: Ken Riesz, El Segundo Power, LLC
Tim Sisk, NRG West Region
Scott Seipel, NRG West Region