

El Segundo Power, LLC
301 Vista Del Mar
El Segundo, CA 90245

Phone: 310.615.6342
FAX: 310.615.6060

November 17, 2005

Mr. Jonathan Bishop
Executive Officer
California Regional Water Quality Control Board, Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

**Re: El Segundo Generating Station, NPDES Permit No. CA0001147, CI-4667;
Response to Comments - Phase II 316(b) Proposal for Information Collection**

Dear Mr. Bishop,

On October 21, 2005, the Los Angeles Regional Water Quality Control Board ("Regional Board") submitted written comments to El Segundo Power, LLC ("ESP") regarding ESP's Phase II 316(b) Proposal for Information Collection ("PIC") and Impingement Mortality and Entrainment Characterization Study Sampling Plan ("IM&E Sampling Plan") for the El Segundo Generating Station ("ESGS"). The ESGS PIC and IM&E Sampling Plan were originally submitted to the Regional Board on July 29, 2005. Herein, please find ESP's responses to the Regional Board's comments. ESP requests that these responses be considered in light of the fact that in order to meet the Phase II 316(b) scheduled date for submittal of the Comprehensive Demonstration Study of January 7, 2008, field work for the IM&E Sampling Plan must begin in January of 2006. **Therefore, at a minimum, written concurrence with the ESGS IM&E Sampling Plan is requested as soon as possible, but no later than December 1, 2005.**

The following paragraphs provide responses to the general and specific Regional Board comments. Where appropriate, ESP has also revised the relevant sections of PIC and/or IM&E Sampling Plan in response to the comments. Revised sections of the PIC and IM&E Sampling Plan are attached as a "redline" version for easy viewing of the changes, as well as clean copies of the documents.

General Comment #1 - Trading for compliance with Phase II 316(b) Rule

ESP believes there are potential significant economic and ecosystem benefits and synergies that could be realized from a watershed compliance approach and hopes that the Regional Board and US EPA can work with power plant owners to develop such a program.

General Comment #2 – U.S. EPA estimated zero compliance cost for ESGS

In Section 125.94(a)(5)(i) and (ii) of the Phase II 316(b) regulation, US EPA provides detailed steps and procedures associated with determining US EPA's facility compliance cost and comparing those to the "actual" facility compliance costs and/or the benefits associated with a site specific determination of best technology available. The US EPA procedures include, (1) identifying what technology the Administrator modeled as the most appropriate compliance technology for the facility, and, (2) using the Administrator's costing equations, calculate the annualized compliance costs for the facility using the design intake flow and the chosen technology. These two steps were performed by US EPA and the results were included in a letter from US EPA dated February 17, 2005 and included in Attachment B of the ESGS PIC. The US EPA results were that (1) no additional technology is necessary at ESGS, stating "this class of technology, in concert with the intake location and depth, would consistently meet the performance range for the impingement mortality and entrainment performance standards," and, (2) the US EPA's compliance cost for ESGS is zero, stating "the facility was not assigned any additional technologies or costs." ESP expects, should it elect to pursue the site specific determination compliance option (cost-cost or cost-benefit tests), that it would follow and use these specific procedures and the US EPA results in order to determine site specific best technology available.

General Comment #3 – Contractor, laboratories, and/or in-house staff used for conducting sampling events?

The IM&E sampling at ESGS will be conducted primarily by staff from MBC Applied Environmental Sciences ("MBC") with assistance from Tenera Environmental ("Tenera"). The entrainment and source water plankton samples will be processed and organisms identified by Tenera. Tenera has been involved with all of the 316(b) studies conducted in California over the past ten years, and MBC has been involved in recent 316(b) studies at the Huntington Beach Generating Station, entrainment studies at four generating stations in 2004, and has conducted NPDES impingement monitoring at most of the generating stations in southern California over the past 30 years. Therefore, both firms have extensive experience in conducting the type of sampling proposed for the ESGS 316(b) studies. These studies have been conducted using QA/QC procedures developed by Tenera and MBC.

General Comment #4 – Recommendations for hydrologic modeling to identify CWIS Radius of Influence ("ROI") and cumulative impacts evaluation.

A hydrologic modeling study for purposes of identifying the intake ROI is not necessary or appropriate for an IM&E study. The reasons are as follows:

1. The sampling design proposed for ESGS has sampling stations upcoast, downcoast, and offshore from the power plant. The sampling was designed to account for the prevailing alongshore currents in the vicinity of the ESGS with the total distance sampled alongshore being based on average current speeds from studies in Santa Monica Bay;

2. The organisms within the ROI would be continually changing due to both short- and long-term changes in current patterns;
3. The proposed sampling includes the regions within the hydraulic ROI and areas outside the ROI that are affected by larger scale coastal hydrodynamic forces other than the intake;
4. The proposed modeling assessment methodologies (e.g. Empirical Transport Model) fully account for the ROI as it predicts the likelihood for entrainment mortality to occur for source water larvae;
5. The final report will include a description of the hydrodynamics of the Santa Monica Bay source water with an analysis of the current meter data collected during the one-year study period.

For these reasons, hydrologic modeling to identify the radius of influence (ROI) is not necessary for the ESGS IM&E study.

Regarding the Regional Board recommendation to conduct a cumulative impact evaluation, such evaluations are not required as part of the Phase II 316 (b) regulation. The regulation requires IM&E characterization for purposes of establishing a calculation baseline for measuring compliance with the IM&E performance standards. The US EPA promulgated these standards based on technological performance such that each generating station would be expected to achieve them and, as such, would be protective of fish and shellfish. Therefore, the only information that is required to be collected by Phase II 316(b) is the impingement and entrainment rates at the ESGS intakes. The ESGS IM&E Sampling Plan includes one entrainment sampling station at each of the two intake structures to meet that requirement.

While the two intake entrainment sampling locations are sufficient to characterize entrainment at ESGS, the IM&E Sampling Plan also includes ten source water larval sampling stations in the vicinity of the ESGS intakes. This additional and voluntary sampling enables ESGS to complete impact modeling assessments that may be useful toward achieving compliance using the restoration measure and/or site specific compliance determination options. However, this information is not being collected to evaluate the cumulative impacts on the biota of the Santa Monica Bay that may be caused by various anthropogenic and natural influences.

Of course, nothing precludes the Regional Board from using this data, once collected, analyzed, and reported, to conduct its own cumulative impacts assessments. If the Regional Board chooses to conduct such a study, it should at a minimum, conduct a study that evaluates all sources of stressors on fish and shellfish populations, including, but not limited to, recreational and commercial fishing, all sources of boating and shipping, non-point source discharges (e.g. stormwater discharges from all sectors, including transportation, agricultural, and municipal), all point source discharges (not just power plants), habitat modification and/or destruction, invasive species, and meteorology and climatology influences, among others.

General Comment #5 – Evaluate feasibility of using other source waters for once through cooling water.

The California Energy Commission (“CEC”) performed a detailed and exhaustive evaluation of alternate cooling water sources, including the utilization of secondarily treated wastewater from the City of Los Angeles Hyperion Wastewater Treatment Plant (“Hyperion Plant”) for cooling the ESGS power plant as part of the El Segundo Power Redevelopment Project (“ESPR”) Application for Certification.

A large volume of information was generated and evaluated on the Hyperion Plant cooling alternative for the ESGS power plant, as well as many hours of testimony as part of the ESPR evidentiary hearings. The CEC concluded in its Final Decision for the ESPR project that such alternative cooling was not feasible, stating “**Based on evidence in the record, the Energy Commission finds that the Hyperion Wastewater Cooling alternative is not feasible and would result in greater impact to the environment**” (page 59 of the ESPR Final Decision). The ESPR Final Decision contains a detailed assessment of the Hyperion Plant cooling option, including the numerous fatal flaws in the concept. This information can be found in the CEC’s Final Decision of the ESPR project on pages 59-65. Since this issue was completely evaluated and rendered as infeasible as part of a CEQA driven alternatives assessment, that assessment is sufficient and no further evaluation is necessary.

Text in the PIC has been added into a new Section 5.2.4 to include this information and the conclusions of infeasibility.

Specific Comment #1 – Section 2.5 Calculation Baseline and Section 5.1.1 Velocity Cap Inlet

First, ESP believes that velocity cap effectiveness as an impingement control technology is very well documented and proven to accomplish actual impingement reduction rates in the higher range of the Phase II 316(b) impingement standard. Not only did the original study at El Segundo document a 95% reduction in impingement, but many other cooling water intakes were built with velocity caps because the design is recognized as a very effective method of reducing impingement.

Additionally, the Los Angeles Department of Water and Power and Southern California Edison (former owner of the ESGS) both studied the effectiveness of velocity capped intakes. The effectiveness of the velocity caps of the Huntington Beach Generating Station (“HBGS”) and Ormond Beach Generating Station (“OBGS”) cooling water intake structures, which are similar in design to the intake structures at the ESGS, were studied in July 1979 and July 1980 (Thomas et al. 1980). The study examined entrapment (the entry of fishes into the cooling water intake system) during periods of normal flow (with the velocity cap) and reverse flow (without the velocity cap). Researchers also examined differences between entrapment rates during daytime and nighttime.

During both study periods, entrapment rates were substantially lower when the velocity cap was in use. Entrapment was also higher at nighttime than during daytime. On average, the velocity cap resulted in an 82% reduction in entrapment at the HBGS, and 74% at the OBGS.

Pender (1975) examined the effectiveness of the velocity caps used at the Scattergood Generating Station (“SGS”). A velocity cap was added to the cooling water intake structure in 1958 (the “old” velocity cap), but was damaged beyond repair in June 1970. The old velocity cap was removed from service in August 1970. After this time, the generating station operated in reverse flow, withdrawing cooling water from the discharge and discharging through the intake. This was done to minimize any further damage to the intake velocity cap. While operating in this configuration, fish impingement was substantially higher than in the past, and the California Department of Fish and Game (CDFG) requested the generating station continue operating in reverse configuration to document the effectiveness of the velocity cap. Results indicated that the velocity cap reduced impingement by about “a factor of ten”. After reviewing this data, the CDFG requested that LADWP install a new velocity cap on the SGS intake structure as soon as possible. The new intake velocity cap at SGS was designed similarly to those in use at San Onofre Nuclear Generating Station Units 2 and 3, and put in place in October 1974. With this new cap in place, impingement was reportedly reduced by a factor of about 2.4.

Summaries of these studies will be added to the ESGS PIC in Section 5.

Second, the Regional Board appropriately points out that the location of the existing velocity cap intakes results in the withdrawal of water from a different region than otherwise would occur at a typical shoreline intake structure. Therefore, the location of the existing velocity cap may be effective at reducing entrainment if plankton densities are generally lower at this location.

The proposed source water plankton sampling locations at the intake and 66 and 99 foot depth contours will allow an evaluation of ichthyoplankton abundance trends with distance from shoreline. These additional samples in deeper waters (66 and 99 foot depths) will help to determine if there are depth related gradients in plankton abundance in this portion of the Santa Monica Bay. These studies will help ESGS determine if the current depth, location, and design is a qualitative improvement over a shoreline intake for purposes of meeting all of, or part of, the IM&E performance standards.

Specific Comment #2 – Section 3.0 Historical Studies

While the ESGS PIC summarizes impingement data from long-term monitoring (1972-2004), ESP still intends to (1) collect additional impingement data during the new one year IM&E study, and, (2) supplement the new data with recent impingement data (2002-2005). This will be sufficient for the Impingement Mortality Characterization, which is required to “characterize annual, seasonal, and diel variations in the impingement mortality...” (§125.95(b)(3)(ii)).

Use of historical data in determining the Calculation Baseline is required to be “representative of the current operation of your facility and of biological conditions at the site” (§125.95(b)(3)(iii)). Therefore, impingement data will be expressed as the number (or biomass) of fish impinged per

volume of cooling water flow (i.e., No./1,000,000 m³) to account for daily, monthly, seasonal, and annual variations in cooling water flow volume. This allows comparison of impingement data regardless of flow volume.

ESP believes the existing annual impingement monitoring data is not out-dated and was collected using appropriate methodologies and QA/QC measures. ESP expects that some portions of the new sampling planned for ESGS will demonstrate that the methods used by previous investigators were appropriate and correct. ESP believes that the 2002-2005 impingement monitoring is unbiased, professional and accurately characterizes the ESGS impingement rates. This time period was chosen to provide a total of five years of data, but it does not preclude ESP from analyzing additional impingement data collected since 1972. These data were collected using procedures and QA/QC measures that were consistent with the methods used for the 2002-2005 sampling. These data would allow a comparison of long-term trends.

Specific Comment #3 – Section 5.0 Intake Technology Evaluation

Similar to what is described above in response to General Comment #5, all possible alternative cooling technologies were evaluated as part of the CEC Application for Certification for the ESPR Project. These alternatives, including dry, wet, and hybrid cooling options, were evaluated in detail by the CEC staff and found to be infeasible at the ESGS site. The CEC's Final Decision for the ESPR Project stated, "Staff rejected other alternative cooling options because Staff considered them infeasible. Dry cooling and wet/dry cooling were eliminated because the site is not large enough for those technologies and because they would cause adverse noise and visual impacts. Once through cooling with tertiary (drinking quality) treated wastewater was eliminated because Hyperion does not have a tertiary treatment facility and because the cost of such a facility and its water would be excessive. The Commission agrees with Staff and finds that these alternatives are infeasible" (page 52, ESPR Final Decision).

Text has been added into the ESGS PIC (Section 5.2.4) to include a review of the ESPR project assessment of alternative cooling options and the finding of infeasibility in response to the Regional Board's comment.

Specific Comment #4 – Section 5.1.4 Aquatic Filter Barrier

Aquatic filter barrier technology is a technology that has many potential fatal flaws associated with its feasibility at the ESGS facility; however, ESP still considers it a technology that warrants further evaluation in the ESGS CDS. Further evaluation will be conducted as part of the Phase II 316(b) requirement to evaluate IM&E control technology as well as to comply with the CEC ESPR Certification. ESPR Condition of Certification BIO-2 requires a feasibility study of aquatic filter barrier technology, and ESP intends the ESGS Phase II 316(b) evaluation of this technology to accomplish that goal as well as comply with the requirements of Phase II 316(b). At this time no actual deployment of a pilot scale project is expected as part of the technical feasibility evaluation. The ESGS PIC has been revised to clearly describe the intent behind the technical evaluation of aquatic filter barrier technology.

Specific Comment #5 – Section 5.2.1 Fine-Mesh Traveling Screens

ESP agrees that onshore and offshore fine mesh traveling screens structures are infeasible at ESGS. The current version of the ESGS PIC describes fine mesh traveling screens in Section 5.2 – Technologies Considered Infeasible. Since ESP and the Regional Board agree this technology is infeasible at ESGS, ESP will not conduct any further evaluation of the technology and the PIC will not be revised.

However, ESP and its consultants do not concur with the Regional Board's statement that a traveling screen approach velocity of 0.5 ft/s or less is not necessary for fine mesh screens to properly function. While this is irrelevant to the ESGS facility due to the above agreement that fine mesh screens are infeasible at ESGS, ESP would still like to provide the following additional information on this subject.

Each life stage of entrainable species has an inherent fragility that affects their ability to survive impingement on fine mesh traveling screens. Previous lab studies of fine mesh screen systems indicated that duration of impingement, screen travel speed, spray wash water velocity, and approach velocity of the water to the screen all had effects on survival. Although results of survival varied with species, most of the tests showed that to be effective at avoiding larval mortality, the approach velocity to the traveling water screens should be approximately 0.5 ft/s, or less. Many hardy species could survive a higher approach velocity, but most locations where the fine mesh screen have been tested, the target populations included both hardy and fragile organisms and the 0.5 ft/s approach was generally effective for most species.

Specific Comment #6 – Section 6.0 Operations Evaluation

ESP concurs with this comment. The results of the IM&E Study will be used to determine if flow reductions during certain times of the year or day could be used in meeting the performance standards for reducing impingement and entrainment at the cooling water intake structure. No revision of the ESGS PIC is necessary as part of this comment.

Specific Comment #7 – Section 7.3 Project Restoration Evaluation Criteria

ESP agrees that the priority emphasis should be placed on restoration measures that have a clear nexus to species affected by impingement mortality and entrainment, that maximize ecological benefits to Santa Monica Bay, and provide benefits within a reasonable period of time. The text in Section 7.3 of the PIC will be changed accordingly.

Specific Comment #8 – Section 9.0 Impingement Mortality and Entrainment Sampling

The Regional Board identified the following sections of the PIC where additional information on the IM&E Sampling Plan is necessary.

Fish Eggs - ESP decided to not include an assessment of fish eggs in the study due to several factors. First, recent studies at coastal power plants near estuarine or harbor areas similar to

ESGS have shown that entrainment is largely dominated by larval and juvenile stages of fish, such as gobies and blennies, which do not have an entrainable planktonic egg stage. Second, fish eggs generally cannot be identified to the same taxonomic levels as fish larvae and therefore it is infeasible to estimate the number of eggs that should be included in the assessments for individual species. This would likely lead to underestimates of egg entrainment for specific species. A more conservative approach, and one ESP proposes to utilize in the IM&E Sampling Plan, is to assume that fish eggs are entrained in the same relative proportions as fish larvae and account for fish egg entrainment in the assessment models. For organisms with available life history information, estimates of larval and egg survival can be used to estimate the number of eggs that would have been entrained from abundances of larvae in the samples. Egg mortality can be accounted for in the ETM model by adding the time period that eggs are planktonic to the estimate of the time period that larvae of that species are at risk of entrainment. This approach assumes that the proportional mortality estimate used in the modeling of larval entrainment also applies to egg mortality and that mortality on passage through the cooling system is 100% for both egg and larval stages. This approach is consistent with the new 316(b) Phase II rule since the CDS is not an impact assessment, but a demonstration of compliance that will meet EPA's 316(b) Phase II performance requirements. As a result the presence of the eggs is a reasonable presumption as is the expectation that compliance with the performance standards will result in a reduction in entrainment of all life stages, including eggs. Per the Regional Board's request, ESP has amended the PIC and IM&E Sampling Plan to better explain this approach.

Target Taxa - The specific fishes or shellfishes that will be analyzed in the assessment will be limited to the species that are sufficiently abundant to provide reasonable assessment of impacts. The analyses typically include the most abundant taxa that together comprise 90-95 percent of all larvae entrained and/or juveniles and adults impinged by the generating station. The most abundant taxa are used in the assessment because they provide the most robust and reliable estimates for the purpose of scaling restoration projects or quantification of the ecological benefits under the cost-benefit test. Since the most abundant organisms may not necessarily be the organisms that experience the greatest effects on the population level, the data will be examined carefully before the final selection of taxa to determine if additional taxa should be included in the assessment. This may include commercially or recreationally important taxa, and taxa with limited habitats. In addition, any threatened or endangered fish or shellfish species would be included in the assessment; however, since these studies were initiated in the 1970's, no listed fish or shellfish species have been entrained or impinged at the ESGS. The final analysis will include species representing a range of habitat types and trophic levels. This will likely include fishes such as northern anchovy, white croaker, and queenfish that have previously been identified as being abundant in the vicinity of the ESGS intake. In addition, the final taxa analyzed in the assessment will be decided upon in consultation with staff biologists from the Regional Board and other agencies. Staff from the National Marine Fisheries Service, the California Department of Fish and Game, and various Regional Boards have been involved in all of the recent studies completed in southern California and have approved the sampling plans and analysis approaches which are the same as the those proposed for the ESGS. Per the Regional Board's request, ESP has amended the PIC and IM&E Sampling Plan to better explain this approach.

Cancer Crabs – The ESGS PIC places an emphasis on Cancer crabs as opposed to other types of crabs because they are the most important commercial and recreational group of crabs found in the vicinity of the ESGS. The new 316(b) Phase II rules require quantifying the impingement mortality and entrainment of all fish and shellfish. ESP believes that ‘shellfish’ refers to species of crustaceans and mollusks that are targeted by commercial and recreational fisheries. As a result, the sampling focuses on the shellfish that are commercially and recreationally harvested such as Cancer crabs, spiny lobster, shrimp, squid, and octopus. This is also consistent with the US EPA allowance for representative species to be used in the analysis, with the focus of the benefits analysis on commercially and recreationally important species.

Proportion of Samples that will be Identified - The entrainment and source water samples will be collected using a bongo frame that simultaneously collects two samples. All of the entrainment and source water plankton samples collected using the bongo frame will be processed and identified. Normally, the data from the two samples are combined, but if the quantity of material in the two samples is very large only one of the two samples will be processed and analyzed. The samples from the two nets are normally preserved in separate 400 ml jars. If the quantity of material in a jar exceeds 200 ml then the sample is split into multiple jars to ensure that the material is properly preserved. When this quantity of material is collected, only the material from one of the nets would be processed depending upon the nature of the material. In some cases ctenophores, salps, and other larger planktonic organisms may result in samples with large volumes of material, but these can be separated from other plankton and may not be split depending upon the final volume of the material. Per the Regional Board’s request, ESP has amended the PIC and IM&E Sampling Plan to better explain this approach.

Length of Study - The study is proposed for one year, which is consistent with other recent 316(b) studies. The extensive source water sampling and the modeling approaches included in the proposed study will provide data that are less subject to year-to-year variation than studies that are just based on collection of entrainment samples. While the absolute abundance of any species in entrainment can vary considerably over time, the proportional withdrawal of that species from the source water population will be much less variable and is more dependent on the ratio of the intake to source water volumes than on entrainment and source water abundances.

It should be noted that the Phase II 316(b) regulation also requires two years of verification monitoring after facility modifications for operational changes or new technologies are implemented to verify performance of those measures. Therefore, besides the new one year IM&E Study, ESGS will also be completing two additional years of verification monitoring, should that compliance option be utilized. It is also anticipated that impingement monitoring will continue pursuant to the existing requirements of the plant’s NPDES permit.

Lastly, as noted by the Regional Board in this comment, there is insufficient time to extend the IM&E sampling and still meet the timeline requirements of the Phase II 316(b) regulation, given that a complete and final CDS is due no later than January 7, 2008.

For these reasons, ESP does not propose to alter its plan for a new, one year IM&E Study at ESGS.

Specific Comment #9 – Attachment C Impingement Mortality and Entrainment Characterization Study Sampling Plan

The Regional Board identified the following sections of the IM&E Study Plan where additional information is necessary.

Section 3.1 Definition of Extreme Event - If during the 24-hour sampling an extreme event occurs resulting in the impingement of a large number of fishes, we may continue sampling an additional day or two to obtain a more representative estimate of the impingement rate for the sampling period. Based on historical impingement data, an extreme impingement event during normal operation impingement sampling would be defined as a sample comprised of greater than 200 fishes and/or 200 shellfishes impinged in a 24-hr normal operation survey. Large numbers of organisms in impingement samples could potentially result from the entrainment of a school of fish (such as anchovies or sardines). Such events will usually have a short duration and it will be important to identify the duration in order to provide an accurate estimate of the impingement rate. Per the Regional Board's request, ESP has amended the PIC and IM&E Sampling Plan to better explain this approach.

Section 3.2 Quality Control – The quality assurance/quality control measures included in Section 3.1 of the IM&E Sampling Plan will be expanded as follows:

A quality assurance/quality control (QA/QC) program will be implemented to ensure that all of the organisms are removed from the debris and that the correct identification, enumeration, length and weight measurements of the organisms are recorded on the data sheet. Random cycles will be chosen for QA/QC re-sorting to verify that all the collected organisms were removed from the impinged material. Quality control surveys will be done on a quarterly or more frequent basis if necessary during the study. If the count of any of individual taxon made during the QA/QC survey varies by more than 5 percent (or one individual if the total number of individuals is less than 20) from the count recorded by the observer then the next three sampling cycles for that observer will be checked. The survey procedures will be reviewed with all personnel prior to the start of the study and all personnel will be given printed copies of the procedures that will also be included with the final IM&E study report.

Data sheets will be reviewed by the field staff coordinator prior to completing the sampling. The data sheets will then be submitted to the impingement task leader for review and approval prior to data entry. Output from data entry will be checked against field sheets and any corrections made in the database prior to analysis.

Section 4.3 Definition Criteria for Sample Processing – The following text will be added to the IM&E Sampling Plan to explain the criteria that will be used to determine if only one of the two bongo frame samples will be processed:

Normally, the data from the two samples are combined, but if the quantity of material in the two samples is very large only one of the two samples will be processed and analyzed. The samples

Mr. Jonathan Bishop
Response to Comments – ESGS Phase II 316(b) Proposal for Information Collection
Page 11 of 11
November 17, 2005

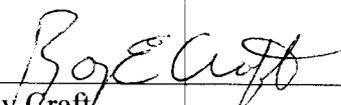
from the two nets are normally preserved in separate 400 ml jars. If the quantity of material in a jar exceeds 200 ml then the sample is split into multiple jars to ensure that the material is properly preserved. When this quantity of material is collected, only the material from one of the nets would be processed depending upon the nature of the material. In some cases ctenophores, salps, and other larger planktonic organisms may result in samples with large volumes of material, but these can be separated from other plankton and may not be split depending upon the final volume of the material.

Closing

ESP has herein addressed and answered to the extent possible, each of the Regional Board's comments and has revised the PIC and IM&E Sampling Plan accordingly. Since the bulk of the comments have no affect on the actual IM&E sample collection methodology, or location or frequency, ESP will proceed with mobilization of resources into the field in order to maintain the January 2006 start date for IM&E sampling. However, ESP still requests written concurrence with the revised versions of the PIC and IM&E Sampling Plan. **At a minimum, ESP requests concurrence with the IM&E Sampling Plan as soon as possible, but no later than, December 1, 2005, in order to maintain the proposed compliance schedule.**

ESP looks forward to continuing to work with the Regional Board in implementing the Phase II 316(b) regulations. If you have any questions on this matter, please contact Mr. Tim Hemig at (760) 268-4037.

Sincerely,
El Segundo Power, LLC
By: NRG El Segundo Operations Inc.
It's Authorized Agent

By: 
Roy Craft
Plant Manager

cc: Tim Hemig
Alexander Sanchez
David Lloyd