

Neill, Ben@Waterboards

From: George Courser <gcourser@hotmail.com>
Sent: Tuesday, June 12, 2018 11:12 PM
To: sandiego
Subject: June 20th, #8 Informational Item: Presentation from Southern California Edison on the Status of the Decommissioning and the Storage of Spent Fuel at the San Onofre Nuclear Generating Station (SONGS).
Attachments: SONGS1.pdf; Toxic waste at SONGS (1).pdf

Please include the below listed pdf

[R9-2015-0073](#) San Onofre Nuclear Generating Station

https://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2015/R9-2015-0073.pdf

ORDER NO. R9-2015-0073 NPDES NO. CA0109282 WASTE DISCHARGE

...

www.waterboards.ca.gov

southern california edison order r9-2015-0073 san onofre nuclear generating station npdes no.

SanDiego@waterboard.ca.gov

06-12-2018

Via email

San Diego Regional Water Quality Control Board
San Diego Region 9
2375 Northside Suite 100
San Diego Ca 92108

Chair Morales, Vice Chair Abarbanel and Board members Anderson, Olson, Strawn and Warren.

RE: June 20th, #8 Informational Item: Presentation from Southern California Edison on the Status of the Decommissioning and the Storage of Spent Fuel at the San Onofre Nuclear Generating Station (SONGS). (Ben Neill)

Dear Chair Morales, Board members and staff -

The Citizens of San Diego and Orange Counties are indebted to your Board for requesting that critical information regarding environmental and human health and safety at SONGS be made available to the public. This is a profound day, one where the ratepayers and impacted public may finally learn of some of the broad range of risks associated with the closure of a nuclear plant and the safety of those in the surrounding environments.

Remarkably and unfortunately, the “information report” is being presented by EDISON, the exact discharger, plant owner, decommissioning party, monopoly Investor Owned Utility (IOU) and possibly the root cause of the SONGS nuclear plant failure due to unapproved re-design features and exceeding the operating temperature limits of the newly installed replacement steam generators.

Such a presentation is entirely untenable and impossibly conflicted. Compounding these inconsistencies is the utilization of an EDISON power point as a “supporting document”. [Supporting Document No. 1](#) - Southern California Edison Presentation Slides. Incorporating corporate propaganda as a “supporting document” is antithetical to an unbiased and factual presentation of risks and dangers of SONGS..

What has been learned by Regional Board document search (attached): (TENTATIVE DRAFT NPDES PERMIT ADDENDUM NO. 1 FOR SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NOS. 2 AND 3, ORDER NO. 99-47 AND 99-48, NPDES PERMIT NOS. CA0108073 AND CA0108181) is that Edison has effectively been allowed use of the Pacific Ocean as an underwater dump; without benefit of landfill restrictions and regulations which could prevent a Superfund condition.

The allowable limits of discharge - in effect since June of 2000 - have been nearly incomprehensible. . .the quantities discharged astounding, the toxicity beyond many of our imaginations. While it was known that extensive SONGS "mitigation" was required and implemented on location at the San Elijo Lagoon said to be some \$80 million, yet the full measure of impacts to the Pacific have not been further described or accounted for.

The renewal of discharge conditions on December 2015 likewise represented quantities and toxicities, which while slightly reduced, would have required immediate abatement regarding groundwater discharges on land. There have been no substantial reductions in quantities of allowable waste or their toxicity. The discharges remain in effect. Please see the below.

ORDER NO. R9-2015-0073 NPDES NO. CA0109282

https://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2015/R9-2015-0073.pdf

Even in light of massive reports generated by EDISON and it's subservient and wholly industry captured Nuclear Regulatory Commission, pressing questions remain unanswered and ignored.

1. Are there existing monitoring wells on the SONGS site?
2. Are there sufficient monitoring wells to alert a concerned public of an unauthorized discharge of hazardous or nuclear waste?
3. How much tritium has been produced on site in the history of Unit One, Two and Three?
4. Of the tritium produced to date, how much has been captured and contained on or off site in storage?
5. What quantity of the tritium produced to date has been flushed through the outfall pipes of Unit One, Two and Three?

6. Is the Regional Board staff and Board aware of documented tritium releases?
7. What are the actual quantities of waste material being released into the Pacific through the outfall pipes on a daily, weekly and yearly basis?
8. Do we have discharge release records and where are they available?
9. Are fish caught in the Pacific off of Oceanside and San Clemente safe to consume?
10. Are surfers and swimmers off of San Onofre safe to do so?

Thank you to our Region 9 Board members for your attention and concerns regarding this blight to our coast and the closely related water quality problems.

Speaking only for myself, wife, children and grandchildren who reside in Region 9,

George and Karen Courser
3214 San Helena Drive
Oceanside, CA 92056
858-231-0156
gcourser@hotmail.com



June 8, 2000

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C.

Subject: **Docket Nos. 50-361 and 50-362**
Proposed Amendment to SONGS Units 2 and 3 NPDES Permits
San Onofre Nuclear Generating Station Units 2 and 3

References: (attached)

- 1) Letter to John H. Robertus, San Diego Regional Water Quality Control Board, "Comments on Draft NPDES Permit addenda No. 1 for Nos. CA0108073 and CA0108181," from H. W. Newton, SCE, dated June 2, 2000
- 2) Letter to H. W. Newton, SCE, "Tentative Draft NPDES Permit Addendum No. 1 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, Order No. 99-47 and 99-48, NPDES Permit Nos. CA0108073 and CA0108181," from John H. Robertus, San Diego Regional Water Quality Control Board, dated May 8, 2000

Gentlemen:

The San Diego Regional Water Quality Control Board (RWQCB) is proposing to amend the NPDES Permits CA0108073, Order 99-47, and CA0108181, Order 99-48 for SONGS Units 2 and 3 respectively (attachment 2). The proposed addendum adds discharge limits and monitoring requirements for certain in-plant waste streams and modifies existing limits on others. Our comments on the addendum (attachment 1) include a request to add another chemical to the permit.

The RWQCB staff intend to present the tentative addendum to the RWQCB on June 14, 2000. Any changes adopted at that time will be forwarded to the NRC as required by Appendix B of the Units 2 and 3 Technical Specifications, Section 3.2, Environmental Protection Plan, to Operating License Nos. NPF-10 and NPF-15 for San Onofre Units 2 and 3, respectively .

If you have any questions, please contact me or Mr. Scott Medling at (949) 368-7492.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Edward Scherer'.

Enclosures

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3
J. W. Clifford, NRC Project Manager, San Onofre Units 2 and 3
S. Y. Hsu, Department of Health Services, Sacramento

P. O. Box 128
San Clemente, CA 92674-0128
949-368-7501
Fax 949-368-7575

A001



June 2, 2000

Mr. John H. Robertus
Executive Officer
San Diego Regional Water Quality Control Board
9771 Clairemont Mesa Blvd., Ste. A
San Diego, CA 92124-1324

SUBJECT: Comments on Draft NPDES Permit addenda No. 1 for Nos. CA0108073 and CA0108181
Order Nos. 99-47 and 99-48
San Onofre Nuclear Generating Station (SONGS) Units 2 and 3

Dear Mr. Robertus:

My staff has reviewed the draft permit addenda for Permit Nos. CA0108073 and CA0108181. We request that the following changes be made to the draft:

On page 2, finding 7: SCE requests that the word "debate" be changed to the word "consideration."

On page 2, finding 7: please change "descreet" to "discrete."

On page 2, finding 6, you propose the addition of three control stations for the quarterly temperature and transmissivity monitoring. SCE proposes that control stations F-24S, F26S, and F20S be removed. The stations F22S and C22S will remain. Three new control stations can then be added on the H, J, and M lines. These stations will be H22S, J22S, and M22S (see attached map). This grid would provide an adequate array of control stations for analysis.

Currently, the NPDES permits for Unit 1 and Units 2 and 3 have different due dates for the monthly, semiannual and annual reports. The Unit 1 reports are due on the first of the month, after the month following the subject month of the report. The Units 2 and 3 permits are due the 30th of the following month. SCE requests that the Units 2 and 3 reports due dates be changed to be consistent with the Unit 1 report due dates.

The addendum also requires that SCE perform a composite sample annually on all in plant waste streams on Units 2 and 3. Some waste streams, like the thermophillic digester and the BPS sump and metal cleaning waste, are not released during a given year. SCE requests that only those waste streams that are discharged during that monitoring year be included in the composite.

Mr. John Robertus
June 2, 2000

Page 2 of 2

SCE also requests that another chemical be added to the Units 2 and 3 NPDES permit. San Onofre currently has problems with birds on site, which result in potential health hazards as well as material degradation issues at the plant. SCE proposes the use of ReJeX-iT® TP-40 to abate these problems. The MSDS for ReJeX-iT® TP-40 is enclosed with this letter.

Any comments or corrections that are made in the draft in this letter should also be reflected in the fact sheet if applicable. If you have any questions about any of the comments in this letter, please contact Robert Heckler (949) 368-6816 or Mary Jane Johnson (949) 368-6651.

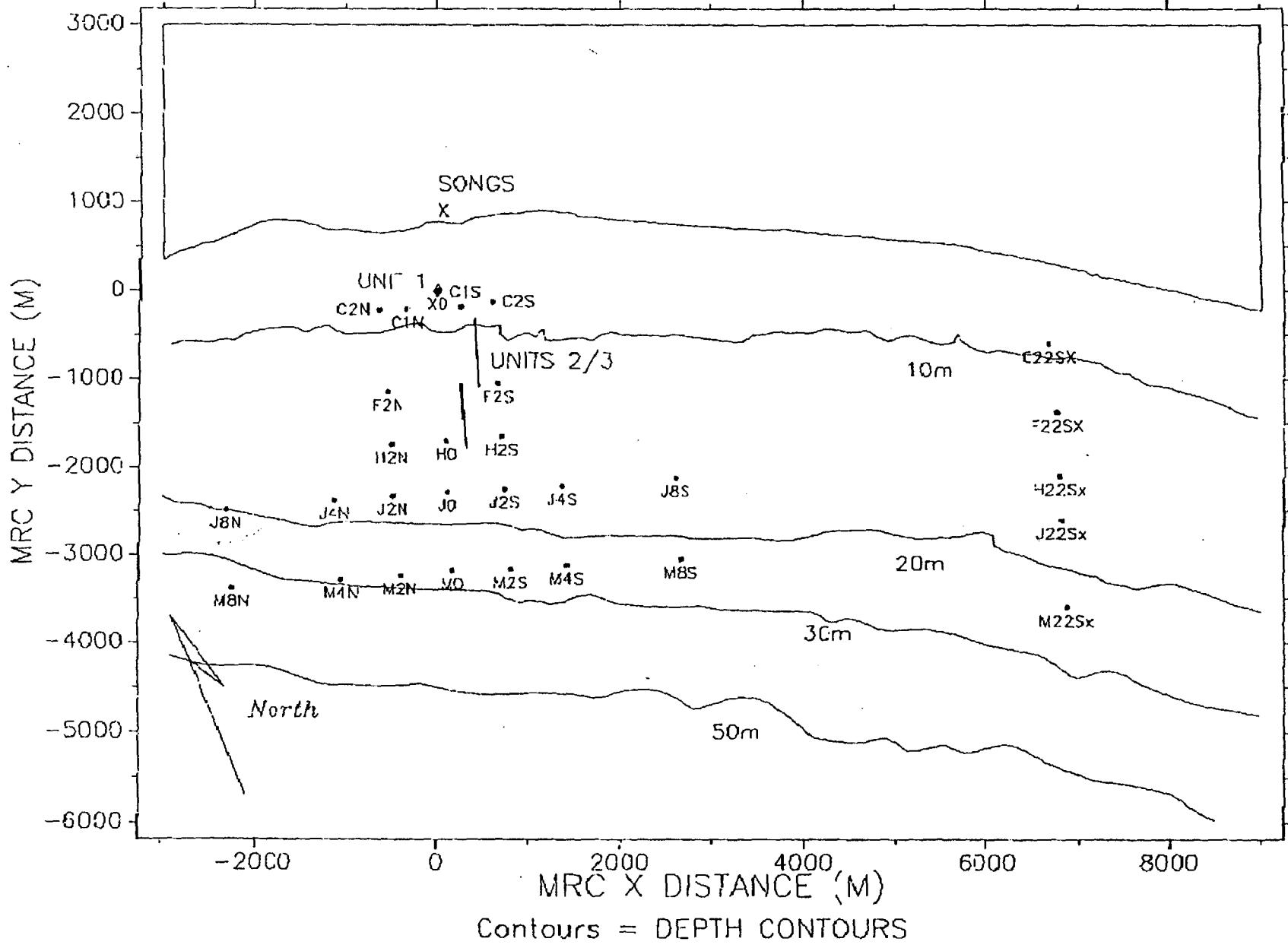
Sincerely,



H.W. Newton
Manager, Site Support Services

cc: D. Nunn
R. V. D. Reid/D.W Kay
A. Scherer/K.C. Yhip
M. J. Johnson
N. Mascolo
R. Heckler

Figure 3 Water Quality Station Locations



DIRECTION FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

FOGGING

USE RESTRICTIONS: This product may be used in area applications to repel nuisance birds from 1) electric substations and structures; 2) buildings and structures that are not in/on or adjacent to natural or fish-bearing bodies of water. Use caution when there are risks of direct exposure to humans, pets, domestic animals, or non target wildlife. Use caution when there are risks of discoloration of plants, painted structures, or other valuable property. Do not smoke while applying this product. Do not apply this product in areas where plant toxicity is likely to occur.

APPLICATION DIRECTIONS: Apply this formulation undiluted by use of thermal or mechanical smoke/fog generators that can deliver particle sizes within the aerosol size range (below 30 microns). Birds must be exposed to airborne TP-40 if it is to achieve lasting results.

Withhold treatment until conditions favoring successful use arise. TP-40 should be applied when birds have settled down in the roosting areas.

Apply undiluted TP-40 at the rate of 1 to 4 ounces per 10,000 cubic feet of space to be treated. Hold fog generator's applicator at least 5 feet from objects to achieve desired results. Several treatments, 1 to 4 days apart, may be needed.

WARRANTY STATEMENT

NOTICE: The manufacturer warrants that this product conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this product is fit for its intended purpose. Since timing, method of application, weather and ground conditions, mixture with other chemicals, and other factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions, or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use.

Stamp 11/18/05
99/04/15

ReJeX-IT® TP-40

BIRD REPELLENT

ACTIVE INGREDIENT:

Methyl Anthranilate (MA)
methyl 2-aminobenzoate.....40.0%

INERT INGREDIENTS60.0%

TOTAL 100.0%

ReJeX-IT® TP-40 has been formulated from Food Grade Ingredients with an active ingredient that exceeds US Food Chemical Codex (FCC) specifications.

KEEP OUT OF REACH OF CHILDREN
CAUTION
See Left Panel for additional precautionary statements.

Manufactured for
RJ Advantage, Inc.

501 Murray Road, Cincinnati, Ohio 45217
EPA EST. No. 71638-OH-001 EPA REG. No. 58035-7

NET CONTENT: 5 Gallons NET WEIGHT: 40 lbs

PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Avoid contact with eyes or clothing. When handling, wear safety glasses. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

For terrestrial uses. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. This pesticide is slightly toxic to aquatic invertebrates.

STORAGE & DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

STORAGE: Store only in original container, in a dry place inaccessible to children, pets and domestic animals. Store apart from other pesticides, fertilizers, food or feed that may cause cross-contamination from odor. Keep container closed when not in use.

REPELLENT DISPOSAL: Avian Aversion Agent or rinse water that cannot be used according to label instructions must be disposed of according to Federal or approved State procedures. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved by State and local authorities.

RJ ADVANTAGE, INC.
 A Subsidiary of PMC Specialties Group, Inc.

ReJeX-iT® TP-40

MATERIAL SAFETY DATA SHEET

SECTION I

<p>EPA EST. NO.: MANUFACTURED FOR: ADDRESS:</p> <p>EMERGENCY TELEPHONE: FOR TRANSPORTATION EMERGENCY: CHEMICAL NAME AND SYNONYMS: TRADE NAMES AND SYNONYMS: CHEMICAL FAMILY: DOT SHIPPING DESCRIPTION: PRODUCT NUMBER:</p>	<p>58035-OH-001 RJ Advantage, Inc. 501 Murray Road Cincinnati, OH 45217 (513) 242-3300 (800) 424-9300 Proprietary Formulation ReJeX-iT® TP-40 Aromatic Acid Ester Not Regulated X20RJ4125</p>
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SECTION II INGREDIENTS

<u>MATERIAL</u>	<u>WT %</u>	<u>EXPOSURE LIMITS</u>
Methyl Anthranilate †	~ 40	Not Assigned
Inert Ingredients *	~ 60	Not Assigned

* Trade Secret available to health personnel upon request
 † Not hazardous per OSHA 29CFR1910.1200

SECTION III PHYSICAL DATA

<p>BOILING POINT: FREEZING POINT: SPECIFIC GRAVITY @ 25° C: VAPOR PRESSURE @ 25° C: VAPOR DENSITY: SOLUBILITY IN WATER: % VOLATILES BY VOLUME: EVAPORATION RATE: APPEARANCE AND ODOR:</p>	<p>208° C, 406° F -4° C .953 5.5 mm Hg N/A Insoluble N/A N/A Clear blue liquid, Grape like odor</p>
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MSDS

ReJeX-iT[®] TP-40

Page 2

EPCRA HAZARDS**IMMEDIATE HEALTH HAZARD:** None**FIRE HAZARD:** None**DELAYED HEALTH HAZARD:** None**EXPLOSIVE HAZARD:** None**SECTION IV FIRE AND EXPLOSION HAZARD DATA****FLASH POINT:**

248° F (TCC)

AUTOIGNITION TEMPERATURE:

N/A

FLAMMABLE LIMITS IN AIR:

N/A

EXTINGUISHING MEDIA:

Dry Chemical, Foam

SPECIAL FIRE FIGHTING PROCEDURES: Full protective equipment including self-contained breathing apparatus should be used. If water is used, fog nozzles are preferable. Water may be used to cool closed containers to prevent pressure build-up and/or explosion when exposed to extreme heat.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Closed containers may explode (due to the build-up of pressure) when exposed to extreme heat.

SECTION V HEALTH HAZARD DATA**THRESHOLD LIMIT VALUE:** None Assigned

EFFECTS OF OVEREXPOSURE: Excessive exposure may cause slight eye irritation. The materials in this product are designated by the U.S. Food & Drug Administration as Generally Recognized As Safe (GRAS) for unlimited use as human food/fragrance additives.

EMERGENCY AND FIRST AID PROCEDURES: **IF INHALED:** If affected, remove from exposure. Restore breathing. Keep warm and quiet.

IF ON SKIN: Wash affected area thoroughly with soap and water.

IF IN EYES: Flush eyes with large amounts of water for 15 minutes. If irritation persists, get medical attention.

IF SWALLOWED: Never give anything by mouth to an unconscious person. Give several glasses of water. If vomiting is not spontaneous, induce vomiting. Keep airway clear. Seek medical attention.

TOXICITY DATA:Oral LD₅₀ (rat) > 5,000 mg/kg

Dermal - Not corrosive or sensitizing

MSDS ReJeX-IT[®] TP-40
Page 3

09/06/95

SECTION VI REACTIVITY DATA

STABILITY: Stable

INCOMPATIBILITY: Oxidizing Agents

HAZARDOUS DECOMPOSITION PRODUCTS: BY FIRE: Carbon Dioxide, Carbon Monoxide and Oxides of Nitrogen.

HAZARDOUS POLYMERIZATION: Will not occur

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE THE MATERIAL IS SPILLED OR RELEASED: Spilled material can be collected and placed in a covered waste disposal container.

WASTE DISPOSAL METHOD: Spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to Federal or approved State procedures, Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

SECTION VIII SPECIAL PROTECTIVE INFORMATION

RESPIRATORY PROTECTION: N/A

VENTILATION: Local exhaust preferable, general exhaust acceptable if in an enclosed area.

PROTECTIVE GLOVES: Wear rubber gloves for long or repeated contact.

EYE PROTECTION: Wear safety glasses with unperforated sideshields.

OTHER PROTECTIVE EQUIPMENT: Eye wash, safety shower.

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Store only in original container, in a dry place inaccessible to children, pets, and domestic animals. Store apart from pesticides, fertilizers, food or feed that may cause cross-contamination from odor.

OTHER PRECAUTIONS: Avoid excessive exposure. Keep away from open flames. Keep container closed when not in use. Use in ventilated areas only.

MSDS
Page 4

ReJeX-IT® TP-40

06/20/95

SECTION X REGULATORY STATUS

Registered for use as a bird aversion agent under Federal Insecticide, Fungicide & Rodenticide Act (FIFRA) administered by the United States Environmental Protection Agency (US EPA); meets the criteria for "reduced risk" (Pesticide Regulation Notice 93-9). EPA Reg. No. is #58035-7.

ReJeX-IT® TP-40 is formulated with food grade ingredients that exceed U.S. Food Chemical Codex (FCC) specifications.

The active ingredient is classified as a naturally occurring flavorant by the US EPA and is included in the Generally Recognized As Safe list (GRAS, 21CFR182.60) by the US FDA. Inert ingredients are GRAS listed, also.

PREPARED: September 8, 1995
SUPERSEDES: March 17, 1995

The information contained herein is based on the data available to us and is believed to be correct as of the date prepared; however, RJ ADVANTAGE, INC. makes no warranty, expressed or implied regarding the accuracy of these data or the results to be obtained from the use thereof.



Winston H. Hickox
Secretary for
Environmental
Protection

June 20, 2018
Item 8
Supporting Document No. 3

California Regional Water Quality Control Board

San Diego Region



Gray Davis
Governor

Internet Address: <http://www.swrcb.ca.gov/~rwqcb9>
9771 Clairemont Mesa Boulevard, Suite A, San Diego, California 92124-1324
Phone (858) 467-2952 ♦ FAX (858) 571-6972

May 8, 2000

Mr. H. W. Newton
Manager, Site Support Services
Southern California Edison Company
P.O. Box 128
San Clemente, CA 92674

Dear Mr. Newton,

TENTATIVE DRAFT NPDES PERMIT ADDENDUM NO. 1 FOR SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NOS. 2 AND 3, ORDER NO. 99-47 AND 99-48, NPDES PERMIT NOS. CA0108073 AND CA0108181.

Enclosed is a copy of the tentative draft NPDES permit addendum No. 1 for Southern California Edison's, San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, Order Nos. 99-47 and 99-48, and accompanying fact sheet.

The tentative addendum addresses a number of different issues. By letter dated December 10, 1999 Southern California Edison Company (SCE) requested permission to discharge wastes generated at the Unit No. 1 facility through the Unit Nos. 2 and 3 outfalls. The tentative addendum complies with that request. In addition, the tentative addendum brings Order Nos. 99-47 and 99-48 into compliance with two requirements contained in the Water Quality Control Plan for Ocean Waters of California, 1997. Finally, the tentative addendum adds three turbidity monitoring stations to the receiving water monitoring program.

Staff intends to present the tentative addendum to the Regional Board at its regularly scheduled meeting on June 14, 2000. Prior to this time, you are free to submit comments on the tentative addendum. It would be helpful to my staff if you submit written comments as early as possible and preferably by June 5, 2000.

The Board meeting will begin at 9:00 am at the following address:

City of San Diego Metropolitan Wastewater Department
Auditorium
9192 Topaz Way
San Diego, CA

A copy of the tentative addendum and fact sheet were also sent to the U.S. EPA, the California Department of Fish and Game, the U.S. Fish and Wildlife Service, the California Coastal Commission, the Southern California Coastal Water Research Project, the National Oceanic and

California Environmental Protection Agency

Mr. H.W. Newton

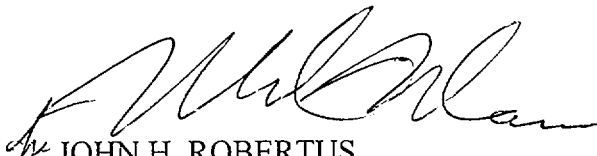
- 2 -

May 8, 2000

Atmospheric Administration, the National Marine Fisheries Service, and the California Energy Commission for review and comment. In addition, my staff has sent notices of the availability of the tentative addendum to the interested parties on the enclosed list.

Please direct comments and questions to Mr. Daniel Phares at (858) 627-3941.

Sincerely,



JOHN H. ROBERTUS
Executive Officer

attachment

File: 13-0087.02 and 13-0088.02

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

ADDENDUM NO. 1

TO

ORDER NO. 99-47 AND 99-48
NPDES NO. CA0108073 AND CA0108181

WASTE DISCHARGE REQUIREMENTS
FOR
SOUTHERN CALIFORNIA EDISON COMPANY
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2 AND UNIT 3
SAN DIEGO COUNTY

The California Regional Water Quality Control Board, San Diego Region (hereinafter SDRWQCB), finds that:

1. On August 11, 1999, the SDRWQCB adopted Order No. 99-47 National Pollutant Discharge Elimination System (NPDES) Permit No. CA0108073, WASTE DISCHARGE REQUIREMENTS FOR SOUTHERN CALIFORNIA EDISON COMPANY SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2 SAN DIEGO COUNTY.
2. Also On August 11, 1999, the SDRWQCB adopted Order No. 99-48 National Pollutant Discharge Elimination System (NPDES) Permit No. CA0108181, WASTE DISCHARGE REQUIREMENTS FOR SOUTHERN CALIFORNIA EDISON COMPANY SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3 SAN DIEGO COUNTY.
3. By letter dated December 10, 1999, Southern California Edison (SCE) requested permission to discharge wastes generated at the Unit No. 1 facility through the Unit Nos. 2 and/or 3 outfalls. The Unit Nos. 2 and 3 permits currently contain provisions for the discharge from the two on-site wastewater treatment plants through either the Unit No. 2 and/or 3 outfall. This addendum modifies Order Nos. 99-47 and 99-48 to allow the discharge of all in-plant waste sources generated at Unit No. 1 through either the Unit No. 2 and/or 3 outfall.
4. In addition, this addendum modifies Order Nos. 99-47 and 99-48 to specifically incorporate the guidance and provisions established in two paragraphs on page 13 of the Water Quality Control Plan for Ocean Waters of California, 1997 (Ocean Plan). Chapter IV, Part B of the Ocean Plan on the fourth paragraph of page thirteen provides specific guidance on the application of Ocean Plan effluent limits and certain monitoring requirements. The existing Orders do not contain provisions for the creation of a sample consisting of all the in-plant waste streams, nor were the limits applied as

- required by the Ocean Plan. This addendum establishes both modified and additional effluent limitations and monitoring requirements in accordance with the Ocean Plan requirement.
4. This addendum also modifies the toxicity reduction evaluation (TRE) implementation procedures to reflect the guidance contained within the Ocean Plan. Chapter IV, Part C of the Ocean Plan on the fifth paragraph of page 13 provides guidance on toxicity reduction evaluation (TRE) requirements. This addendum deletes the original TRE provision in Order Nos. 99-47 and 99-48 and modifies a Monitoring and Reporting Program provision so that a consistent toxic result is required prior to the implementation of the TRE. The existing orders required the implementation of a TRE immediately after a toxicity test result exceeded an effluent limitation.
 6. This addendum also adds three control stations to the receiving water monitoring and reporting program that is shared by Unit Nos. 2 and 3. The additional controls will improve the usefulness of the deep-water turbidity data.
 7. The San Onofre Nuclear Generating Station (SONGS) consists of three discreet operating units, each with a separate intake and discharge structure. Unit No. 1 is the oldest of the three. Originally put into operation in 1968, Unit No. 1 passed a maximum of 460.8 million gallons per day (Mgallons/Day) of cooling water through its condensers until it was shutdown in 1992. SCE was allowed to begin decommissioning the plant around July 1999. The process should continue through 2004. The Unit No. 1 intake structure is located approximately 2,980 feet offshore and is fitted with a velocity cap. The outfall is approximately 2,460 feet offshore and is similar in design to the intake structure except without a cap. The Ocean Plan dilution factor assigned to that outfall is 2.4. The fate of the Unit No. 1 outfall and intake structures is currently under debate. In anticipation of the removal of those structures, SCE has requested permission to discharge Unit No. 1 wastes through the Unit Nos. 2 and 3 outfalls.
 8. SONGS Unit No. 2 and 3 are currently producing electrical power. Each Unit passes a maximum of 1218.6 Mgallons/Day of cooling water through its condensers. The SONGS Unit No. 2 intake is located 3,183 feet offshore. The Unit No. 2 outfall extends along an extensive diffuser array from 5,888 feet to 8,350 feet offshore. The Unit No. 3 intake structure is 3,183 feet offshore. The Unit No. 3 outfall extends from 3,558 feet to 6,020 feet offshore. The Ocean Plan dilution factor assigned to both Unit No. 2 and 3 outfalls is 10.0.
 9. Issuance of this addendum is exempt from the requirement for preparation of environmental documents under the California

May 9, 2000

Addendum No. 1 -3-
Order Nos. 99-47 and 99-48

Environmental Quality Act (Public Resources Code, Division 13, Chapter 3, Section 21000, et seq.) in accordance with Section 13389 of the California Water Code.

10. The SDRWQCB has notified SCE and all known interested parties of its intent to modify Order No. 99-47 and 99-48.
11. The SDRWQCB has, at a public meeting, heard and considered all comments pertaining to this addendum to Order Nos. 99-47 and 99-48.

IT IS HEREBY ORDERED that Order Nos. 99-47 and 99-48 be revised as follows:

1. **Add the following to the Findings Section of Order Nos. 99-47 and 99-48:**

80. By letter dated and received December 10, 1999, SCE requested permission to discharge wastes generated at Unit No. 1 through the Unit No. 2 and/or No. 3 outfall. Additional discharge limitations and monitoring requirements have been added accordingly. SCE is allowed to discharge all regulated waste sources noted in Finding 10 of Order 2000-04 through the Unit No. 2 and/or No. 3 outfall, subject to the limitations contained within this order.

2. **Add the following to Section B, Discharge Limitations of Order Nos. 99-47 and 99-48:**

26. Discharge of all SONGS Unit 1 Low Volume wastes, including radwaste, steam generator draindown, and the oil removal system to the once-through cooling water flow containing pollutants in excess of the following effluent limitations is prohibited:

Parameter	Units	Monthly Average	Daily Maximum	Instant Maximum
Total Suspended Solids	mg/l	30.0	100.0	100.0
Grease and Oil	mg/l	15.0	20.0	20.0

27. Discharges of any Metal Cleaning wastes generated by SONGS Unit No. 1 containing pollutants in excess of the following limitations is prohibited:

Parameter	Units	Monthly Average	Daily Maximum	Instant Maximum
Total Suspended Solids	mg/l	30.0	100.0	100.0
Grease and Oil	mg/l	15.0	20.0	20.0
Copper, total	mg/l	1.0	1.0	1.0
Iron, total	mg/l	1.0	1.0	1.0

3. Replace Discharge Specification B.1, to Order Nos. 99-47 and 99-48 with the following:

1. The combined discharge through the outfall to the Pacific Ocean containing pollutants in excess of the following effluent limitations is prohibited.^{1/}

Parameter	Units	Instantaneous Maximum ^{6/}
Arsenic	ug/l	850
Cadmium	ug/l	110
Chromium (Hexavalent) ^{7/}	ug/l	220
Copper	ug/l	310
Lead	ug/l	220
Mercury	ug/l	4.4
Nickel	ug/l	550
Selenium	ug/l	1700
Silver	ug/l	75
Zinc	ug/l	2100

Parameter	Units	Monthly Average ^{10/}	Weekly Average ^{11/}	Daily Maximum ^{5/}	Maximum at any time
Total Chlorine Residual ^{8/}	ug/l	22	88	200	--

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Acute Toxicity ^{12/}	TUa	1.5	2.0	--	2.5
Chronic Toxicity ^{12/}	TUc	--	--	10	--

Note: ug/l = micrograms per liter

4. Add the following to section B, Discharge Specifications of Order Nos. 99-47 and 99-48:

26. The combined discharge from all in-plant waste sources, sampled as specified in section E of the Monitoring and Reporting Program of this Order, to the once-through cooling water flow containing pollutants in excess of the following effluent limitations is prohibited:

(These are maximum limitations that are calculated using the procedure outlined on page 13 of the Ocean Plan using an initial dilution value of 10.0 and a maximum flowrate of 1286.9 MGD. For compliance purposes, the actual limit shall be determined by the following formula:

$$L_f = (Q_a/Q_m) L_t$$

L_f = final limit used for compliance determination

Q_a = combined discharge flowrate at the time of sampling

Q_m = 1300 MGD

L_t = any limit in the following tables with units "lb/Day")

Parameter	Units	6-Month Median	Daily Maximum
Arsenic	lb/Day	620	3,500
Cadmium	lb/Day	120	480
Chromium (Hexavalent) ^{7/}	lb/Day	240	950
Copper	lb/Day	130	1,200
Lead	lb/Day	240	950
Mercury	lb/Day	5	19
Nickel	lb/Day	590	2,400
Selenium	lb/Day	1,800	7,100

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Parameter	Units	6-Month Median	Daily Maximum
Silver	lb/Day	70	320
Zinc	lb/Day	1,500	8,600
Cyanide	lb/Day	120	480
Ammonia (as N)	lb/Day	55,000	270,000
Phenolic Compounds (non-Chlorinated)	lb/Day	3,100	14,000
Chlorinated Phenolics	lb/Day	120	500
Endosulfan	lb/Day	1.1	2.1
Endrin	lb/Day	0.24	0.47
HCH ^{9/}	lb/Day	0.47	0.94

Parameter	Units	30-day Average
Acrolein	lb/Day	26,000
Antimony	lb/Day	140,000
Bis(2-chloroethoxy) methane	lb/Day	520
Bis(2-chloroisopropyl) ether	lb/Day	140,000
Chlorobenzene	lb/Day	67,000
Chromium (III)	lb/Day	22,000,000
Di-n-butyl phthalate	lb/Day	410,000
Dichlorobenzenes	lb/Day	600,000
1,1-dichloroethylene	lb/Day	840,000
Diethyl phthalate	lb/Day	3,900,000
Dimethyl phthalate	lb/Day	97,000,000
4,6-dinitro-2-methylphenol	lb/Day	26,000
2,4-dinitrophenol	lb/Day	470
Ethylbenzene	lb/Day	480,000
Fluoranthene	lb/Day	1,800
Hexachlorocyclopentadiene	lb/Day	6,800
Isophorone	lb/Day	18,000,000
Nitrobenzene	lb/Day	580

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Parameter	Units	30-day Average
Thallium	lb/Day	1,700
Toluene	lb/Day	10,000,000
1,1,2,2-tetrachloroethane	lb/Day	140,000
Tributyltin	lb/Day	0.17
1,1,1-trichloroethane	lb/Day	64,000,000
1,1,2-trichloroethane	lb/Day	5,100,000
Acrylonitrile	lb/Day	12
Aldrin	lb/Day	0.0026
Benzene	lb/Day	700
Benzidine	lb/Day	0.0081
Beryllium	lb/Day	3.9
Bis (2-chloroethyl) ether	lb/Day	5.3
Bis (2-ethylhexyl) phthalate	lb/Day	410
Carbon Tetrachloride	lb/Day	110
Chlordane	lb/Day	0.0027
Chloroform	lb/Day	15,000
DDT	lb/Day	0.02
1,4-dichlorobenzene	lb/Day	2,100
3,3-dichlorobenzidine	lb/Day	0.96
1,2-dichloroethane	lb/Day	15,000
Dichloromethane	lb/Day	53,000
1,3-dichloropropene	lb/Day	1,100
Dieldrin	lb/Day	0.0047
2,4-dinitrotoluene	lb/Day	310
1,2-diphenylhydrazine	lb/Day	19
Halomethanes	lb/Day	15,000
Heptachlor	lb/Day	0.085
Hexachlorobenzene	lb/Day	0.025
Hexachlorobutadiene	lb/Day	1,700
Hexachloroethane	lb/Day	300
N-nitrosodimethylamine	lb/Day	860

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Parameter	Units	30-day Average
N-nitrosodiphenylamine	lb/Day	300
PAHs	lb/Day	1.0
PCBs	lb/Day	0.0021
TCDD equivalents	lb/Day	0.00000046
Tetrachloroethylene	lb/Day	12,000
Toxaphene	lb/Day	0.025
Trichloroethylene	lb/Day	3,200
2,4,6-trichlorophenol	lb/Day	34
Vinyl Chloride	lb/Day	4,300

5. Replace Section D, Combined Discharge Monitoring, of the Monitoring and Reporting Programs for Order Nos. 99-47 and 99-48 with the following:

D. Combined Discharge^{3/} Monitoring

Samples of the combined discharge shall be collected in accordance with the following criteria:

Parameter	Units	Type of Sample	Minimum Frequency
Flow	MGD	--	Continuous
Turbidity	NTU	Grab	Monthly
Acute Toxicity ^{7/}	TUa	Composite	Quarterly
Chronic Toxicity ^{7/}	TUc	Composite	Semiannually
Chronic Toxicity (metal cleaning) ^{12/}	TUc	Composite	12/
Temperature ^{9/}	°F	--	Continuous
PH	PH units	Grab	Monthly
Total Chlorine Residual ^{5/}	ug/L	Grab	Monthly
Hydrazine	ug/L	Grab	Monthly
Arsenic	ug/L	Grab	Semiannually
Cadmium	ug/L	Grab	Semiannually
Chromium (Hexavalent) ^{4/}	ug/L	Grab	Semiannually
Copper	ug/L	Grab	Semiannually

Parameter	Units	Type of Sample	Minimum Frequency
Lead	ug/L	Grab	Semiannually
Mercury	ug/L	Grab	Semiannually
Nickel	ug/L	Grab	Semiannually
Selenium	ug/L	Grab	Semiannually
Silver	ug/L	Grab	Semiannually
Zinc	ug/L	Grab	Semiannually

6. Endnote 2 of the Monitoring and Reporting Programs for Order Nos. 99-47 and 99-48 is deleted.
7. Replace Section E, In-Plant Waste Streams Monitoring, of the Monitoring and Reporting Programs for Order Nos. 99-47 and 99-48, with the following:

E. IN-PLANT WASTE STREAMS MONITORING

The following shall constitute the in-plant waste stream monitoring program. The reported values shall result from individual grab samples of in-plant waste streams that are collected and composited on a flow-weighted basis. Measurements or estimates of flows of individual in-plant waste streams used as a basis for compositing shall be reported as well as the names of all waste streams sampled. The final sample should include as many wastes as possible. The highest priority waste streams are metal cleaning wastes, radwaste, full flow condensate polishing demineralizer regenerants and high flow make-up demineralizer regenerants. The flowrate used to determine the proportion of each waste stream in the combined sample shall be the yearly average.

The final composite sample shall be derived from all of the following wastestreams:

Unit 2: thermophilic digester, condenser hotwell overboard, steam generator blowdown, blowdown processing system demineralizer regenerants, full flow condensate polishing demineralizer regenerants, makeup demineralizer regenerants, radwaste system, Unit 2 oil/water separator, intake structure sump, metal cleaning waste, seawater pumps bearing flush water, storm drains, and domestic wastewater treatment plants. If any of the following wastes generated at Unit No. 1 are discharged through the Unit No. 2 outfall during the year prior to sampling, they should be included in

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the composite sample: metal cleaning wastes, radwaste, steam generator draindown, and oil removal system.

Unit 3: thermophilic digester, condenser hotwell overboard, steam generator blowdown, blowdown processing system demineralizer regenerants, full flow condensate polishing demineralizer regenerants, makeup demineralizer regenerants, radwaste system, oil/water flocculator, intake structure sump, metal cleaning waste, seawater pumps bearing flush water, storm drains, and domestic wastewater treatment plants. If any of the following wastes generated at Unit No. 1 are discharged through the Unit No. 3 outfall during the year prior to sampling, they should be included in the composite sample: metal cleaning wastes, radwaste, steam generator draindown, and oil removal system.

Parameter	Units	Minimum Frequency of Analysis	Reporting Frequency
PH	pH units	Annual	Annual
Arsenic	lb/Day	Annual	Annual
Cadmium	lb/Day	Annual	Annual
Chromium (Hexavalent) ^{4/}	lb/Day	Annual	Annual
Copper	lb/Day	Annual	Annual
Lead	lb/Day	Annual	Annual
Mercury	lb/Day	Annual	Annual
Nickel	lb/Day	Annual	Annual
Selenium	lb/Day	Annual	Annual
Silver	lb/Day	Annual	Annual
Zinc	lb/Day	Annual	Annual
Cyanide	lb/Day	Annual	Annual
Ammonia (expressed as nitrogen)	lb/Day	Annual	Annual
Phenolic Compounds (non-chlorinated)	lb/Day	Annual	Annual
Chlorinated Phenolics	lb/Day	Annual	Annual
Endosulfan	lb/Day	Annual	Annual
Endrin	lb/Day	Annual	Annual
HCH ^{6/}	lb/Day	Annual	Annual

Acrolein	lb/Day	Annual	Annual
Antimony	lb/Day	Annual	Annual
Bis(2-chloroethoxy) methane	lb/Day	Annual	Annual
Bis(2-chloroisopropyl) ether	lb/Day	Annual	Annual
Chlorobenzene	lb/Day	Annual	Annual
Chromium (III)	lb/Day	Annual	Annual
Di-n-butyl phthalate	lb/Day	Annual	Annual
Dichlorobenzenes	lb/Day	Annual	Annual
1,1-dichloroethylene	lb/Day	Annual	Annual
Diethyl phthalate	lb/Day	Annual	Annual
Dimethyl phthalate	lb/Day	Annual	Annual
4,6-dinitro-2- methylphenol	lb/Day	Annual	Annual
2,4-dinitrophenol	lb/Day	Annual	Annual
Ethylbenzene	lb/Day	Annual	Annual
Fluoranthene	lb/Day	Annual	Annual
Hexachlorocyclopentad iene	lb/Day	Annual	Annual
Isophorone	lb/Day	Annual	Annual
Nitrobenzene	lb/Day	Annual	Annual
Thallium	lb/Day	Annual	Annual
Toluene	lb/Day	Annual	Annual
1,1,2,2- tetrachloroethane	lb/Day	Annual	Annual
Tributyltin	lb/Day	Annual	Annual
1,1,1-trichloroethane	lb/Day	Annual	Annual
1,1,2-trichloroethane	lb/Day	Annual	Annual
Acrylonitrile	lb/Day	Annual	Annual
Aldrin	lb/Day	Annual	Annual
Benzene	lb/Day	Annual	Annual
Benzidine	lb/Day	Annual	Annual
Beryllium	lb/Day	Annual	Annual

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Bis (2-chloroethyl) ether	lb/Day	Annual	Annual
Bis (2-ethylhexyl) phthalate	lb/Day	Annual	Annual
Carbon tetrachloride	lb/Day	Annual	Annual
Chlordane	lb/Day	Annual	Annual
Chloroform	lb/Day	Annual	Annual
DDT	lb/Day	Annual	Annual
1,4-dichlorobenzene	lb/Day	Annual	Annual
3,3-dichlorobenzidine	lb/Day	Annual	Annual
1,2-dichloroethane	lb/Day	Annual	Annual
Dichloromethane	lb/Day	Annual	Annual
1,3-dichloropropene	lb/Day	Annual	Annual
Dieldrin	lb/Day	Annual	Annual
2,4-dinitrotoluene	lb/Day	Annual	Annual
1,2-diphenylhydrazine	lb/Day	Annual	Annual
Halomethanes	lb/Day	Annual	Annual
Heptachlor	lb/Day	Annual	Annual
Hexachlorobenzene	lb/Day	Annual	Annual
Hexachlorobutadiene	lb/Day	Annual	Annual
Hexachloroethane	lb/Day	Annual	Annual
N-nitrosodimethylamine	lb/Day	Annual	Annual
N-nitrosodiphenylamine	lb/Day	Annual	Annual
PAHs	lb/Day	Annual	Annual
PCBs	lb/Day	Annual	Annual
TCDD equivalents	lb/Day	Annual	Annual
Tetrachloroethylene	lb/Day	Annual	Annual
Toxaphene	lb/Day	Annual	Annual
Trichloroethylene	lb/Day	Annual	Annual

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2,4,6-trichlorophenol	lb/Day	Annual	Annual
Vinyl Chloride	lb/Day	Annual	Annual

8. Add the following to the Endnotes section of the Monitoring and Reporting Programs of Order Nos. 99-47 and 99-48:

12. An additional toxicity test shall be performed during the discharge of metal cleaning wastes. Sampling shall occur at the combined discharge.

9. Section J, Receiving Water Monitoring, part 6 and 7 of the Monitoring and Reporting programs of Order Nos. 99-47 and 99-48 are revised as follows:

A. Add additional control stations H22S, J22S, and M22S for temperature and transmissometer profiles.

10. Provision 10 of Order Nos. 99-47 and 99-48 is deleted.

11. Replace Monitoring Provision 22 of the Monitoring and Reporting Programs for Order Nos. 99-47 and 99-48 with the following:

22. Toxicity Provisions

a) Implementation of the Acute and Chronic Limits

If the results of an acute or chronic toxicity test exceeds the limits specified in this order, the discharger shall:

- 1) Take all reasonable measures necessary to immediately minimize toxicity; and
- 2) Increase the frequency of the toxicity test(s) that violated the effluent limitation to at least two times per month until the results of at least three consecutive toxicity tests meet the required standard. Resampling should occur under conditions that mimic the conditions of the initial non-compliant toxicity test.

If the Executive Officer determines that toxicity testing shows a consistent violation of the limits specified in this order, the discharger shall conduct a TRE which includes all reasonable steps to identify the source of toxicity. Once the source of toxicity is identified, upon the Executive Officer's request, the discharger shall

take all reasonable steps to reduce the toxicity to meet the toxicity limitations contained in this Order.

Within fourteen days of completion of the TRE, the discharger shall submit the results of the TRE, including a summary of the findings, data generated, a list of corrective actions necessary to achieve consistent compliance with this Order and prevent future violations, and a time schedule for implementation of such corrective actions. The corrective actions and time schedule shall be modified at the discretion of the Executive Officer.

The EPA acute and chronic manuals EPA/600/6-91/005F (Phase I), EPA/600/R-92/080 (Phase II), and EPA/600/R-92/081 (Phase III) and EPA/600/2-88/070, (TRE protocol for industrials) are excellent resource documents that may be helpful to the discharger.

b) Toxicity Reopener

This permit may be modified in accordance with the requirements set forth at 40 CFR Part 122 and 124, to include appropriate conditions or limits to address demonstrated effluent toxicity based on newly available information, or to implement any EPA-approved new state water quality standards applicable to effluent toxicity.

I, John H. Robertus, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Addendum adopted by the California Regional Water Quality Control Board, San Diego Region, on June 14, 2000.

JOHN H. ROBERTUS
Executive Officer

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

FACT SHEET
FOR
ADDENDUM NO. 1

TO
ORDER NOS. 99-47 AND 99-48
NPDES PERMIT NO. CA0108073 AND CA0108181

WASTE DISCHARGE REQUIREMENTS
FOR
SOUTHERN CALIFORNIA EDISON COMPANY
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NOS. 2 AND 3
SAN DIEGO COUNTY

1. Contact Information

Regional Water Quality Control Board Contact Person:

Daniel Phares
(858)627-3941
9771 Clairemont Mesa Blvd., Suite A
San Diego, CA 92124-1324

Southern California Edison's Contact Person:

Robert Heckler
(949)368-6816
P.O. Box 128 Bldg. W44
San Clemente, CA 92674

2. Reasons for Addendum

By letter dated December 10, 1999 Southern California Edison (SCE) requested permission to discharge wastes generated at the Unit No. 1 facility through the Unit Nos. 2 and 3 outfalls. The tentative addendum complies with that request. The existing Orders are not currently in compliance with the Water Quality Control Plan for Ocean Waters of California, 1997 (Ocean Plan). The addendum brings Order Nos. 99-47 and 99-48 into compliance with two different paragraphs on page 13 of the Ocean Plan. Finally, the receiving water monitoring program data for turbidity is difficult to use due to the lack of appropriate control stations. The tentative addendum adds three deepwater turbidity monitoring control stations to the receiving water monitoring program.

3. Facility and Discharge Description for SONGS Unit No. 1

All three SONGS Units are located immediately adjacent to the Pacific Ocean, approximately two and one-half miles

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southeast of the City of San Clemente. From 1968 to 1992 SONGS Unit 1 functioned as a nuclear-fueled electrical power generating facility. SCE began formal decommissioning of Unit 1 in September 1999. This work is scheduled to continue at least through 2004.

The SONGS Unit 1 cooling water intake structure is located approximately 2,980 feet offshore at a depth of approximately 27 feet.

Currently, an average of 10.08 million gallons per day of cooling water is used to remove waste heat from the spent fuel pool and to dilute various waste streams still generated by the plant. These include: radwaste, steam generator draindown, oil removal system discharge, bearing flush water, metal cleaning waste, sanitary waste, and yard drains. Many of these waste streams are both intermittent and infrequently discharged. All of these wastestreams have been regulated and approved in Order No. 2000-04, Waste Discharge Requirements for Southern California Edison Company, SONGS Unit No. 1. They are considered to have minimal environmental impact. For more information, refer to Order No. 2000-04, Findings 10-18.

Cooling water and in-plant wastes are discharged 2,460 feet offshore at a depth of 25 feet. There is no diffuser structure and discharge exits in a submerged jet of water. The Ocean Plan dilution factor assigned to this discharge is 2.4.

4. Facility and Discharge Description of SONGS Unit Nos. 2 and 3

Unit Nos. 2 and 3 are currently in operation. The nearly identical units each produce 1087 MW of electricity and pass 1218.6 million gallons per day of seawater through their condenser structures. Each unit has its own intake and discharge structure. Wastes added to the cooling water flow include regeneration water from water purification systems, boiler blowdown, metal cleaning wastes, and the water side of an oil water separator. All of these wastestreams have been regulated and approved in Order Nos. 99-47 and 99-48.

The SONGS Unit 2 intake is located 3,183 feet offshore. The Unit 2 outfall extends along an extensive diffuser array from 5,888 feet to 8,350 feet offshore. The Unit 3 intake structure is 3,183 feet offshore. The Unit 3 outfall extends from 3,558 feet to 6,020 feet offshore. The Ocean Plan dilution factor assigned to both Unit No. 2 and 3 outfalls is 10.0.

The character of the Unit Nos. 2 and 3 wastestreams matches the wastestreams generated at Unit No. 1. Therefore, staff expects no unusual mixing effects as a result of combining

the discharges as a result of Edison's request. Furthermore, waste discharged through the Unit Nos. 2 and 3 outfalls is mixed and diluted to a far greater extent than what occurs at Unit No. 1.

5. Description of the Receiving Water

The waters and beaches along this area of the coast provide excellent opportunities for water-related recreational activities which include sightseeing, sunbathing, swimming, surfing, diving, fishing, camping, picnicking, bird watching, and boating. The beaches are utilized year-round with peak usage during the months of July and August.

The direct impacts to the Pacific Ocean resulting from the SONGS Unit Nos. 1, 2, and 3 discharges have been extensively studied. The offshore intake and discharge structures have the potential to impact surfzone and offshore ecosystems. Of particular interest are the impacts to midwater fish populations, areas of rocky substrate where kelp may be present, and sandy bottom organisms. The discharge of Unit No. 1 wastestreams through the Unit Nos. 2 and 3 outfalls will not adversely impact receiving waters.

6. Basis of Waste Discharge Requirements

The federal regulations contain technological limits for steam electric power generation. These limits are found in 40 CFR Part 423. Effluent limitations exist for best practicable control technology currently available (BPT), best available technology economically achievable (BAT), and best conventional pollutant control technology (BCT). The Clean water Act (CWA) requires compliance with all levels of technological limits. Therefore, the most stringent limits were applied.

BPT effluent limitations for low volume waste streams, including total suspended solids and grease and oil limitations, are applied to all low volume wastes at SONGS. Limitations for total suspended solids, grease and oil, copper, and iron are applied to all metal cleaning waste discharges.

The Ocean Plan also sets specific limitations. Effluent limitations on total chlorine residual, acute and chronic toxicity, and instantaneous maximum limits on Ocean Plan Table B toxic materials are applied to the combined final effluent in accordance with the Ocean Plan. Moreover, on page 13 of the Ocean Plan there is a requirement to obtain a composite sample of all in-plant waste streams and apply mass based limits as if that sample were taken at the outfall.

The Ocean Plan establishes a procedure for determining effluent limitations which is based on the minimum initial

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dilution (Dm) of a discharge by the receiving ocean waters. The Ocean Plan defines minimum initial dilution for submerged discharges as complete when the diluting wastewater ceases to rise in the water column and first begins to spread horizontally.

7. Monitoring and Reporting Requirements

Monitoring frequency and constituent analysis for low volume wastes, metal cleaning wastes, combined discharge, and in-plant waste combined samples is consistent with the Ocean Plan, previous Orders, and other power plant permits. The frequency and amount of some monitoring requirements were increased given the size and complexity of SONGS in comparison with other power plants.

Toxicity Reduction Evaluation (TRE) requirements were chosen to be in compliance with the fifth paragraph on page 13 of the Ocean Plan. TRE's are required after toxicity test results consistently exceed the effluent limitation.

8. Effective and Expiration Dates of Addendum No. 1 to Order Nos. 99-47 and 99-48

Addendum No. 1 becomes effective ten (10) days after it is adopted and expires concurrently with Order Nos. 99-47 and 99-48.

There may be some confusion regarding monitoring requirements immediately after the adoption of this addendum. For any given monitoring period, monthly, semiannual, annual, etc., if the discharger has already completed the monitoring requirements prior to the issuance of this addendum, then those results may be submitted in lieu of the analyses required in the addendum. Subsequent monitoring periods should be performed as specified in the addendum.

9. Written Comments

Interested persons are invited to submit written comments upon these draft waste discharge requirements. Comments should be submitted either in person or by mail, during business hours, to:

John H. Robertus
Executive Officer
Attn: Daniel Phares
California Regional Water Quality Control Board,
Region 9
9771 Clairemont Mesa Blvd., Suite A
San Diego, CA 92124-1324

It would be helpful to have written comments submitted by June 5, 2000.

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10. Public Hearing

In accordance with 40 CFR 124.10, the RWQCB must issue a public notice whenever tentative NPDES permits have been prepared, and that the tentative permits will be brought before the RWQCB at a public hearing. The public notice was published in two local newspapers no less than 30 days prior to the scheduled public hearing.

In addition, Southern California Edison, 7 government agencies and approximately 170 known interested parties were notified directly by mail at least 30 days prior to the meeting.

The tentative draft permit Addendum No. 1 to Order 99-47 and 99-48, will be considered by the Regional Board at a public hearing beginning at 9:00 am on June 14, 2000. The location of this meeting is as follows:

City of San Diego, Metropolitan Wastewater Department
Auditorium
9192 Topaz Way
San Diego, CA

11. Waste Discharge Requirement Appeals

After the close of the public hearing, the RWQCB may adopt a final NPDES permit. Any person may petition the State Board to review the decision of the Regional Board regarding the final Waste Discharge Requirements. A petition must be sent to the Office of Chief Counsel, State Water Resources Control Board, P.O. Box 100, Sacramento, CA 95801 within 30 days of the Regional Board public hearing.

12. Additional Information

For additional information, interested persons may write the following address or contact Mr. Daniel Phares of the Regional Board staff at (858)627-3941:

Regional Water Quality Control Board
Attn: Daniel Phares
9771 Clairemont Mesa Blvd., Suite A
San Diego, CA 92124-1324

Copies of the applications, tentative NPDES waste discharge requirements, and other documents (other than those that the Executive Officer maintains as confidential) are available at the RWQCB office for inspection and copying according to the following schedule (excluding holidays):

Monday and Thursday:	1:30 pm to 4:30 pm
Tuesday and Wednesday:	8:30 am to 11:30 am
	1:30 pm to 4:30 pm
Friday:	8:30 am to 11:30 pm

13. Basis for Waste Discharge Requirements

The following documents provide the necessary references for the basis of these NPDES permits:

- a. Water Quality Control Plan, Ocean Waters of California, California Ocean Plan (Ocean Plan), 1997.
- b. The Code of Federal Regulations part 40, Section 122, 136, and 423.
- c. California Regional Water Quality Control Board Order No. 95-02, Waste Discharge Requirements for Southern California Edison Company, San Onofre Nuclear Generating Station, Unit 1, San Diego County.
- d. California Regional Water Quality Control Board Order Nos. 99-47 and 99-48, Waste Discharge Requirements for Southern California Edison Company, San Onofre Nuclear Generating Station, Unit Nos. 2 & 3, San Diego County.

INTERESTED PARTIES

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