RESPONSE TO COMMENTS

FOR

DRAFT RENEWAL OF WASTE DISCHARGE REQUIREMENTS
NPDES PERMIT NO. CA0005622

PACIFIC GAS & ELECTRIC COMPANY
HUMBOLDT BAY POWER PLANT

Humboldt County

All of the following comments were received from PG&E on March 26, 2001.

COMMENT 1,
Finding 10: *Data needed to conduct Reasonable Potential Analysis.* PG&E believes that the SIP does not require monitoring of priority pollutants that are not discharged by the permittee, and feels that they have demonstrated that the power plant does not discharge organics or some of the metals listed. They request that this finding be revised to require monitoring of those priority pollutants that PG&E, in its best professional judgement, believes it might contribute to the discharge and which have been shown to be present based on past monitoring.

Response: Regional Water Board staff disagrees with this opinion. The SIP requires the Regional Water Board to conduct a Reasonable Potential Analysis (RPA) to determine if the priority pollutants have a reasonable potential to be present in the discharge. The RPA is conducted by comparing the results of effluent and receiving water data with maximum contaminant levels promulgated by the California Toxics Rule (CTR). Regional Water Board staff believes that there is not enough data at this time to conduct a RPA. Over a 14-year period, the discharger has submitted three sets of data from the analysis for the priority pollutants in the effluent and no data for the receiving water. Because the age of some of the data, and because of the significant increase in the detection limits for some analyses, rendering the more recent data less useful, more data are needed to conduct the RPA. The tentative permit requires the discharger to collect four effluent samples and two receiving water samples over the next two years, with detection limits specified for the required analyses. With this data, a meaningful RPA can be conducted.

COMMENT 2, Finding 15: *Beneficial Uses.* PG&E requests that "a. agricultural supply" and "g. cold freshwater habitat" be deleted from the list of beneficial uses of Humboldt Bay because these are not beneficial uses of Humboldt Bay.

Response: The Basin Plan lists only one water body, Humboldt Bay, within the Eureka Plain Hyrologic Unit (HU). The creeks that drain into Humboldt Bay (e.g. Jacoby Creek, Janes Creek, etc.) are also considered part of that HU. The beneficial uses for the entire HU are listed in the Basin Plan as beneficial uses of Humboldt Bay. "Agricultural supply" and "freshwater habitat" are listed as beneficial uses of Humboldt Bay. These are actually beneficial uses of the creeks, not the Bay itself. The Bay is too saline to support these beneficial uses. These beneficial uses have been deleted from the tentative permit.

COMMENT 3, Discharge Prohibition 6: "*The discharge of any high-level radioactive waste is prohibited.*" PG&E requests that this prohibition be deleted. Receiving Water Limitation 15 already states the discharge shall not cause radionuclides to be present in concentrations that are deleterious or hazardous. This existing limitation in the permit is adequate to protect the environment and should address the Board's concerns. The proposed prohibition does not add protections for the environment and introduces the term "high-level radioactive waste" that is not defined and is, therefore, subject to interpretation. The existing language in limitation 15 is consistent in intent with the federal regulatory limitations on radioactive discharges from power plants--limitations that are mandated in the license issued by the Nuclear Regulatory Commission for PG&E's nuclear unit.

Response: The prohibition has been reworded to reference a definition of the term "high-level radioactive waste," as follows:

> "*The discharge of any high-level radioactive waste, as defined in 42 USC §10101(12) is prohibited.*"

COMMENT 4, Effluent Limitation 3: *pH limits.* As previously written, this proposed limitation does not differentiate between industrial discharges and stormwater discharges. HBPP has storm water discharges entering the intake and discharge canals that should not be included in this limitation. Due to the natural process of decay of organic materials in soils at the site, the pH of stormwater may be

less than 6.0. Past monitoring of stormwater discharges has indicated that at least in one area of the site the pH on occasion will be less than 6.0. PGE requests that this prohibition be revised to reflect that.

Response: The tentative permit has been modified to place a pH limit only on the industrial discharges as follows:

> *"The pH of all discharges from outfalls 001A, 001B, 001C, 001D, 001E, 001F, 001G, 001H, 002A, and 002B shall have a pH within the range of 6.0 to 9.0."*

COMMENT 5, Receiving Water Limitation 11: *Bioaccumulation of toxic pollutants in sediments.* PG&E requests that this limitation be deleted because steam-electric facilities are exempt from pesticide monitoring under the EPA NPDES application process and pesticides are not discharged from Humboldt Bay Power Plant

Response: Although the discharger is not required to monitor for pesticides under the NPDES permit process, it is not exempt from complying with Basin Plan objectives. The language remains unchanged.

COMMENT 6, Receiving Water Limitation 14: *Chemical constituents in waters designated for use as agricultural supply.* PG&E requests this limitation be deleted, as it applies to waters that are designated for agricultural supply.

Response: This Receiving Water Limitation was deleted from the tentative order.

COMMENT 7, Special Provision 1 & 2: *Priority pollutant monitoring.* PG&E requests that they not be required to monitor for priority pollutants that do not have a reasonable potential to be present or cause violation of a water quality standard. See Comment 1.

Response: These provisions remain unchanged. See response to Comment 1.

COMMENT 8, Monitoring And Reporting Program, Effluent Monitoring: PG&E requests that due to the small drainage area discharging to location 004B, difficulty of sampling runoff from 004B, and the similarity in runoff to 004A (a larger area), that 004B be removed from the monitoring program.

Response: This change has been made to the tentative order.

COMMENT 9, Receiving Water Monitoring: PG&E believes that a single location in Humboldt Bay will satisfy "ambient background" and "beyond the zone of initial dilution." PG&E requests clarification that a single location is adequate for receiving water monitoring.

Response: Samples from both locations are required in order to compare the effect of the discharge on receiving waters. Receiving waters representing ambient background condition will be compared to receiving waters beyond the zone of initial dilution. No change has been made to the tentative order.

COMMENT 10, Toxicity Monitoring -- Chronic Toxicity Monitoring Requirements:
PG&E consulted with its water testing laboratory and learned that the laboratory uses renewal samples every other day instead of every 24 hours. PG&E requests that the wording be changed to: "For toxicity tests requiring renewals, 24-hour composite samples collected every other day are required."

Response: This change has been made to the tentative order.

COMMENT 11,
Determination Of
Priority Pollutants
Requiring Water Quality-Based
Effluent Limitations -- Ambient Background Concentrations Monitoring & Effluent Characterization Monitoring:

PG&E requests that the monitoring be modified to reflect their suggested changes in Comment 1, limiting the monitoring to specific metals and asbestos.

Response: The monitoring program for priority pollutants will remain unchanged. See response to Comment 1.

COMMENT 12,
Table 2: Minimum Levels for Priority Toxic Pollutants:

PG&E is aware from past monitoring that these minimum levels are, for the most part, significantly lower than reporting levels typically achieved by water testing laboratories, particularly in the case of an effluent that is saline. PG&E cannot say to what extent the laboratories will be able to achieve the listed minimum levels.

Response: While some minimum levels may be infeasible for some constituents, PG&E should make an effort to find a laboratory that can come as close as possible. No change has been made to the tentative order.

(pg&eresponse)