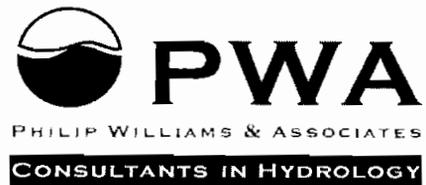


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720 CALIFORNIA ST., 6TH FLOOR, SAN FRANCISCO, CA 94108
 TEL 415.262.2300 FAX 415.262.2303
 SFO@PWA-LTD.COM

TELEPHONE CONVERSATION RECORD

CONTACT NAME	Michelle Ochs	DATE	June 10, 2004
PHONE No.	(760) 776-8962	PWA STAFF NAME	Mark Lindley
COMPANY	Regional Water Quality Control Board	PROJECT No.	1508 - CEC Blythe
TITLE		PROJECT NAME	CEC BEP2
RE	BEP2 – Waste Discharge Requirements		

CONVERSATION SUMMARY

Draft Waste Discharge Requirements

Michelle indicated that Draft WDRs have been prepared and are going through the review process. The Draft WDRs should be ready to pass to CEC for inclusion in the Draft FSA within the next week or two. After the CEC approves the project, the RWQCB will review and possibly revise the Draft WDR's and the public will be given an opportunity to comment.

Since the Revised ROWD has been stamped by a Professional Engineer, the RWQCB tends to defer to the Applicant's Revised ROWD when developing the Draft WDR's. The BEP II WDRs are currently based on the Applicant's capacity claims and maximum operating levels. However, the Draft WDRs may be revised based on specific Conditions of Certification included in the FSA.

Revised Report of Waste Discharge and Response to RWQCB Comments

Michelle and I discussed the Applicant's Revised ROWD and response to RWQCB comments. We noted that the Applicant had revised their claims of excess capacity available to handle shutdowns in the BEP II's brine concentrator down to 1 to 10 days depending on water level in the operable pond(s). We also noted that the Applicant's defined maximum operating levels for solids storage and water levels seemed high and offered limited to zero excess capacity to handle a 100-year storm and/or a shutdown in the brine concentrator.

I expressed concern that the Applicant had defined maximum levels for solids storage at 9 feet above pond bottom for both ponds in operation and 10 feet above pond bottom for one pond in operation, and a maximum operating level for liquid storage at 13 feet above

CONVERSATION

SUMMARY – Cont.

pond bottom. Considering that the maximum storage level allowing for the required freeboard is 13 feet above pond bottom, I thought that the Applicant should define a maximum operating level below 13 feet above pond bottom to allow for a 100-year storm and at least 1 to 2 days of shutdown of the brine concentrator.

Water Board Policy 78-52

Michelle mentioned that there was irrigation return flow water near by the site, and we discussed Policy 78-52 on water supply for power plants. Michelle indicated that the Draft WDRs may reflect this policy in some way depending on internal review. We discussed that, according to Policy 78-52, irrigation return flows would be a more appropriate water source for the plant than the drinking water quality groundwater identified by the Applicant. I also mentioned that the CEC was also looking at dry cooling and suggested that Michelle contact Rich Sapudar at the CEC regarding the current thinking on water use.

BEP I Discharge Data

Michelle mentioned that BEP I was required to report on discharges to it's evaporation ponds on a semi-annual basis and she thought that BEP I was not yet completely operational. Michelle did not think that the RWQCB had received any useful information yet on operation of the BEP I ponds.

Coarse of Action

I discussed my concerns on the maximum operating levels with Michelle and mentioned that I was considering a Condition of Certification limiting the maximum operational water level to below the 13 feet above pond bottom level identified by the Applicant. I think the maximum operating level (for normal operation) should allow for enough excess capacity for a minimum 1-day shutdown of the brine concentrator, and the plant needs to maintain sufficient excess capacity to contain a 100-year storm below the required freeboard at all times.

Michelle indicated that she was willing to revise the Draft WDRs to reflect the CEC's Conditions of Certification after the BEP II plant is certified.

FOLLOW-UP ACTION

Michelle Ochs to forward Draft WDRs for inclusion in the FSA.

ROUTE TO:

Michelle Ochs – RWQCB
Richard Sapudar – CEC