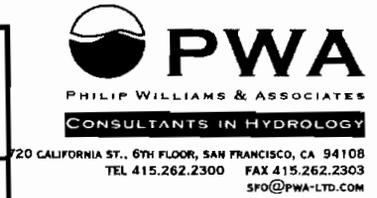


TELEPHONE CONVERSATION RECORD

DOCKET
04-AFC-1
DATE MAY 10 11A
RECD. MAY 10 2006



Call To: Bruce Seale
 Phone #: 415-695-7369
 Company: SFPUC BERM

Date: May 10, 2006
 Time: 12:00 PM
 Project #: 1701.01

Project Name: CEC SFERP

Subject: Request for Clarification 40 CFR 423 - SFPUC BERM Regulations

Conversation Summary:

Vince Geronimo at PWA spoke with Bruce Seale, Senior Wasterwater Control Inspector at the SFPUC Bureau of Environmental Regulation and Management. PWA called to request additional information regarding the SFPUC discharge requirements relating to 40 CFR 423.

Mr. Geronimo provided Mr. Seale with additional information related to the SFERP power generation facility, describing the plant as using fossil fuels not in conjunction with boilers. Mr. Geronimo asked if SFPUC requires industrial dischargers in the City to comply with the limitations of 40 CFR 423 in all cases or only those that meet the categorical definition of a Power Plant Discharger. Mr. Seale confirmed that only those categorical dischargers qualifying as a categorical industrial user subject to the Federal steam electric power generating standards in 40 CFR 423 apply. Mr. Seale also identified that the SFERP will not use PCB transformers which eliminates the potential for the facility's wastewater to contain hazardous materials such as PCBs.

Follow-up / Action Items:

The steam electric rule does not apply to because SFERP satisfies just two of the three qualifying conditions in 40 CFR 423.10 Mr Geronimo respond to the CEC request for clarification.

Dick Ratliff

Route To: _____
