ORANGE COUNTY
OC Public Works
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NCL 08-026

May 8, 2008

DOCKET
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DATE MAY 08 2008
RECD. JUN 27 2008

Mr. Steve Sciortino
City of Anaheim
201 S. Anaheim Blvd., Suite 201
Anaheim, CA 92805

SUBJECT: Canyon Power Plant

Dear Mr. Sciortino:

The above mentioned item is an Application for Certification (AFC) for the Canyon Power Plant located in the City of Anaheim.

The County of Orange has reviewed the AFC and offers the following comments regarding water quality concerns:

Water Quality

1) The water quality impacts of the project should be evaluated in accordance with the provisions outlined in Exhibit 7-I of the 2003 Countywide Drainage Area Management Plan (DAMP). At a minimum, the following information should be provided:

   a) A description of project characteristics with respect to water quality issues, such as project site location in a given watershed, site acreage, change in percent impervious surface area, and BMPs to be incorporated into the project design.

   b) A review of DAMP Exhibit 7.1 Table 7-I.1, Priority Projects Categories. This project is considered a Priority Project and will require the development of a Water Quality Management Plan.

   c) Identification of receiving waters. The DEIR should identify all receiving waters that may receive runoff from the project site.

   d) A description of the sensitivity of the receiving waters. In particular the DEIR should identify Areas of Special Biological Significance, water bodies with Total Maximum Daily Loads (TMDLs), 303(d) listed impaired water bodies.

e) A characterization of the potential water quality impacts from the proposed project and identification of the anticipated pollutants to be generated by the project.

f) An identification of hydrologic conditions of concern, such as runoff volume and velocity; reduced infiltration, and increased flow, frequency, duration, and peak of storm runoff.

g) An assessment of project impact significance to water quality.

h) An evaluation of thresholds of significance.

i) If a proposed project has the potential to create a major new stormwater discharge[1] to a water body with an established TMDL, the EIR should consider quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters.

j) A reasonable analysis of the cumulative impacts of the proposed project together with past, present and reasonably anticipated future projects (related projects) that could produce cumulative impacts with the proposed project.

2) Implementation of post-construction Best Management Practices (BMPs) consistent with the Water Quality Management Plan (WQMP) program in Section 7 and Exhibit 7-II of the 2003 Countywide DAMP. This includes describing commitments to installation and maintenance of site design, source control and treatment control BMPs consistent with the DAMP New Development and Significant Redevelopment Program. Under the new Municipal Stormwater NPDES permit and the 2003 DAMP, this project will be considered a priority project and will require appropriately sized treatment control BMPs to be included in the WQMP which should be targeted to address the pollutants of concern and to achieve the highest level of treatment either singly or in combination (see Table 7.2-6).

3) Mitigation for the construction phase of the project should include compliance with the State General Construction Permit and the inclusion of the following as general or specific notes on project plan sheets:

a) Sediment from areas disturbed by construction shall be retained on site using structural controls to the maximum extent practicable.

b) Stockpiles of soil shall be properly contained to eliminate or reduce sediment transport from the site to the streets, drainage of facilities or adjacent properties via runoff, vehicle tracking, or wind.

[1] Major land development project that has the potential to convert large amounts of pervious land surface to impervious surface area.

c) Appropriate BMPs for construction-related materials, wastes, spills or residues shall be implemented to minimize transport from the site to streets, drainage facilities, or adjoining properties by wind or runoff.

d) Runoff from equipment and vehicle washing shall be contained at construction sites unless treated to reduce or remove sediment and other pollutants.

e) All construction contractor and subcontractor personnel are to be made aware of the required best management practices and good housekeeping measures for the project site and any associated construction staging areas.

f) At the end of each day of construction activity all construction debris and waste materials shall be collected and properly disposed in trash or recycle bins.

g) Construction sites shall be maintained in such a condition that a storm does not carry wastes or pollutants off the site. Dischargers other than stormwater (non-stormwater discharges) are authorized under California's General Permit for Storm Water Discharges Associated with Construction Activity only where they do not cause or contribute to a violation of any water quality standard and are controlled through implementation of appropriate BMPs for elimination or reduction of pollutants. Non-stormwater discharges must be eliminated or reduced to the extent feasible.

   Potential pollutants include but are not limited to: solid or liquid chemical spills; wastes from paints, stains, sealants, solvents, detergents, glues, lime, pesticides, herbicides, fertilizers, wood preservatives, and asbestos fibers, paint flakes or stucco fragments; fuels, oils, lubricants and hydraulic, radiator or battery fluids; concrete and related cutting or curing residues; floatable wastes, wastes from any engine/equipment steam cleaning or chemical degreasing; wastes from street cleaning; and superchlorinated potable water line flushing and testing.

   During construction, disposal of such materials should occur in a specified and controlled temporary area on-site physically separated from potential stormwater runoff, with ultimate disposal in accordance with local, state and federal requirements.

h) Discharging contaminated groundwater produced by dewatering groundwater that has infiltrated into construction site is prohibited. Discharging of contaminated soils via surface erosion is also prohibited. Discharging of non-contaminated groundwater produced by dewatering activities requires a National Pollutant Discharge Elimination System (NPDES) permit from the Santa Ana Regional Water Quality Control Board.

If you have any questions, please contact Mary Ann Jones at (714) 834-5387.

Sincerely,

Ronald L. Tippets, Chief
Current and Environmental Planning