

APPENDIX H

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT AND RESPONSES TO COMMENTS

COMMENT LETTER 1

**DEPARTMENT OF TOXIC SUBSTANCES
CONTROL**



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201



Gray Davis
Governor

November 8, 2000

Mr. Darren W. Stroud
South Coast Air Quality Management District
21865 E. Copely Drive
Diamond Bar, California 91765

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE
PROPOSED LOS ANGELES DEPARTMENT OF WATER AND POWER'S
ELECTRICAL GENERATION STATIONS MODIFICATIONS (PROJECT),
SCH 2000101008

Dear Mr. Stroud:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the above mentioned Project.

Based on the review of the document, the DTSC comments are as follows:

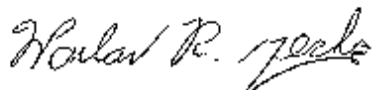
- 1-1 1) The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.
- 1-2 2) The draft EIR needs to identify any known or potentially contaminated site within the proposed Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 1-3 3) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 1-4 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate Health and Safety procedures should be implemented. If it is determined that contaminated soil exists, the draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

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Mr. Darren W. Stroud
November 8, 2000
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DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP or to meet/discuss this matter further, please contact Bob Krug, Project Manager, at (818) 551-2866 or me at (818) 551-2877.

Sincerely,



5-1 [Harlan R. Jeché
Unit Chief
Southern California Cleanup Operations - Glendale Office

cc: [Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

5-2 [Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center

5-3 [Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

5-4 [

COMMENT LETTER 1: DEPARTMENT OF TOXIC SUBSTANCES CONTROL

The Department of Toxic Substances Control (DTSC) provided comments 1-1 through 1-4 in response to the Notice of Preparation/Initial Study (NOP/IS) for the Proposed Los Angeles Department of Water and Power's Electrical Generation Stations Modification Project. Since these comments were received after the NOP/IS comment period had ended, responses to the comments are being provided in association with the responses to the Draft Environmental Impact Report (EIR). The data requested in the comments on the NOP/IS by DTSC are included in the Draft EIR. DTSC did not submit comments on the Draft EIR.

Response 1-1: The DTSC is referred to Section 4.10.2 of the Draft EIR for information concerning the potential for releases of hazardous materials/substances associated with current or historic uses within the proposed project areas.

Response 1-2: Actions associated with the proposed project will be conducted within the confines of the proposed project areas. Refer to Section 4.10.2 for information concerning known or potentially known environmentally impacted areas within the proposed project areas. Based on the environmental assessment activities conducted within the proposed project areas, environmentally impacted areas within the proposed project areas do not pose a threat to human health or the environment.

Response 1-3: The SCAQMD appreciates the DTSC's comment. In the event that the actions associated with the proposed project result in the need for investigative and/or remedial activities, the LADWP will be required to notify the appropriate regulatory agency, who will ensure that LADWP conduct such activities, as required, under the oversight of the regulatory agency.

Response 1-4: As stated in Section 4.10.2, in the event that contaminated soils are encountered during the project site construction-related activities, the soils will be treated/disposed in accordance with all applicable local, state and federal rules and regulations. In the event that the actions associated with the proposed project result in the need to manage and handle contaminated soils, the LADWP will be required to notify the appropriate regulatory agency, who will ensure that LADWP conduct such activities, as required, under the oversight of the regulatory agency.

COMMENT LETTER 2

**CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD, LOS ANGELES REGION**



California Regional Water Quality Control Board
Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>



November 29, 2000

Steve Smith, Ph.D.
Program Supervisor
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182



**RESPONSE TO NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT
FOR THE PROPOSED LOS ANGELES DEPARTMENT OF WATER AND POWER
ELECTRICAL GENERATION STATIONS MODIFICATIONS**

Dear Dr. Smith:

The Regional Water Quality Control Board (RWQCB) staff appreciates the opportunity to comment on the above project. Staff has reviewed the Notice of Preparation, and provides the following comments.

2-1

The Scattergood Generating Station (SGS) discharge outfall is located in the Pacific Ocean, outside of the surf zone. Staff has no specific comments on the proposed installation of the selective catalytic reactor (SCR) at SGS.

2-2

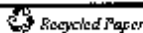
The Harbor Generating Station (HGS) discharge outfall is located in the consolidated slip within the Los Angeles-Long Beach harbor. This harbor is impaired for metals including copper, lead, zinc, and chromium; benthic effects; and sediment toxicity. The Los Angeles Regional Water Quality Control Board will be developing Total Maximum Daily Loads (TMDLs) for the harbor, but the proposed project is expected to proceed before the applicable TMDLs are developed.

In the interim, the Regional Board must carefully evaluate the potential impacts of new projects that may discharge to impaired water bodies. Thus, we request the following information to better evaluate the potential impacts of these discharges from HGS:

2-3

- A quantifiable estimate of the volume of wastewater to be generated by these modifications;
- The composition of pollutants in this wastewater, including toxic metal concentrations, priority pollutants, pH, temperature; and
- Mass loading of bio-accumulative pollutants in this wastewater.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Appendix H – Responses to Draft EIR Comments

SC Air Quality Management District

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November 29, 2000

2-4

Although the RWQCB database contains some data for the Valley Generating Station (VGS), the database does not specify the types of discharges and destination of facility wastewater discharges. We request information on the wastewater discharges similar to our above request for HGS. In addition, we would appreciate information on the wastewater discharge coordinates location, and any existing treatment systems

Thank you for the opportunity to comment on the proposed project. We hope that these comments will ensure an adequate analysis of water quality issues. If you have any questions please contact Dr. Tony Rizk at (213) 576-6756.

Sincerely,

Melinda Merryfield-Becker
TMDL, Unit Chief

5-1

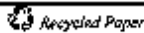
cc: State of California Clearinghouse
Susan Damron, City of Los Angeles, Department of Water and Power

5-2

5-3

5-4

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

COMMENT LETTER 2: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION

The Regional Water Quality Control Board (RWQCB) provided comments 1-1 through 1-4 in response to the Notice of Preparation/Initial Study (NOP/IS) for the Proposed Los Angeles Department of Water and Power's Electrical Generation Stations Modification Project. Since these comments were received after the NOP/IS comment period had ended, responses to the comments are being provided in association with the responses to the Draft Environmental Impact Report (EIR). The data requested in the comments on the NOP/IS by RWQCB are included in the Draft EIR. RWQCB did not submit comments on the Draft EIR.

Response 2-1: The SCAQMD acknowledges that the California RWQCB does not have comments regarding the proposed installation of the selective catalytic reduction equipment.

Response 2-2: The SCAQMD acknowledges that the RWQCB will be developing Total Maximum Daily Loads (TMDLs) for the Los Angeles-Long Beach harbor and that the proposed project is expected to proceed before the applicable TMDLs are developed. Please also see response to comment 2-3.

Response 2-3: The RWQCB is referred to Section 4.8.3.1 of the Draft EIR where it is stated that the proposed project will not change the design or quality and quantity of the discharge from Harbor Generating Station's cooling system which discharges to the Los Angeles-Long Beach harbor. These discharges are conducted under Waste Discharge Requirements contained in Order No. 95-027 which serves as National Pollutant Discharge Elimination System (NPDES) Permit No. CA0000361. It should be noted that the duration of Order No. 95-027 was five years (the order was issued in 1995), such that the order and NPDES permit have expired and must be renewed. Per RWQCB policy, LADWP is allowed to continue operating under its expired permit until the new order and permit have been approved. Further, until the new order and permit are approved, LADWP is prohibited from making modifications that would alter its current (year 2000; per LADWP fax dated December 7, 2000 from Rey Reyes Jr. to Tony Rizk) wastestreams in either volume or pollutant concentrations.

Furthermore, the following information responds specifically to the three bullet points in comment 2-3.

Appendix H – Responses to Draft EIR Comments

Bullet 1: On November 13, 2000, DWP submitted to the RWQCB an amendment to its NPDES permit renewal application for its HGS. The amendment identified the proposed equipment modifications to be made at HGS and reported that there would be no additional wastestreams, the low volume waste (LVW) flow (i.e., from the demineralizer regeneration and reverse osmosis processes) would more closely approximate the maximum design flow listed in the initial permit renewal application, and that the overall average design flow of the once-through circulating water system would remain the same. On December 6, 2000, DWP additionally faxed to the RWQCB, LVW flow data for 1998, 1999, and 2000 (year-to-date).

Bullet 2: The permit renewal application for HGS, which was submitted on July 13, 1999, contained a full chemical analysis of the wastewater discharged from the facility. This analysis included toxic metal concentrations, priority pollutants, pH and temperature. The modifications to occur during the proposed project will not add additional wastestreams nor will it substantially change the chemical characteristics of the existing wastestreams. Therefore, the information provided to the RWQCB in the permit renewal application is reflective of the wastewater pollutant composition that will be discharged after completion of the proposed facility modifications.

Bullet 3: Mass loading values can be calculated by utilizing the pollutant concentration found in the wastewater and the volume of wastewater discharged. DWP provides pollutant concentration data and information on the volume of wastewater discharged to the RWQCB on both a monthly and a semi-annual basis. The permit renewal application, which contains the most comprehensive pollutant analysis, would also have the concentration of any bio-accumulative pollutants found.

Response 2-4: The RWQCB is referred to Section 3.8.2.3 for information concerning the types of discharges and designation of facility wastewater discharges from Valley Generating Station (VGS).

Furthermore, please note the VGS discharges its wastewater to the sanitary sewer system under an industrial waste permit issued by the City of Los Angeles Bureau of Sanitation. VGS does not discharge its wastewater to a surface waterbody which, if it did, would require oversight and approval from the RWQCB. Nevertheless, information on the types of discharges, existing treatment systems, and the destination and location of the wastewater discharges was faxed to the RWQCB on December 1, 2000. DWP subsequently responded to a follow up telephone request

Appendix H – Responses to Draft EIR Comments

from the RWQCB to provide one year of wastewater monitoring data. This was faxed to the RWQCB on December 12, 2000.

COMMENT LETTER 3

DEPARTMENT OF TRANSPORTATION

DEPARTMENT OF TRANSPORTATION
OFFICE OF ADVANCE PLANNING
DISTRICT 7, IGR OFFICE 1-10C
120 SO. SPRING ST.
LOS ANGELES, CA 90012
TEL: (213) 897-6696 ATSS: 8-647-6696
FAX: (213) 897-6317



December 14, 2000

IGR/CEQA es/001201
DEIR
City of Los Angeles
Wilmington, Playa del Rey, Sun Valley
Modification of 3 DWP Power Plants
Via. LA-1-10.74; LA-1-30.08; LA-5-35.70
SCH #

Mr. Darren Stroud
South Coast Air Quality Management District
Planning Department
21856 E. Copley Dr.
Diamond Bar, CA 91765

Dear Mr. Stroud:

Thank you for including Caltrans in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

3-1

We recommend that operational and construction related truck trips on State highways be limited to off-peak commute periods. Transport of oversize or over-weight vehicles on State highways will need a Caltrans Transportation Permit. Transport of hazardous material will need to comply with all applicable State and federal regulations.

If you have any questions regarding our response, refer to Caltrans IGR/CEQA Record # es/001201, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

for

STEPHEN BUSWELL
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

**COMMENT LETTER 3: CALIFORNIA DEPARTMENT OF
TRANSPORTATION**

Response 3-1: The SCAMD appreciates the Department of Transportation's (DOT) recommendation and information concerning project compliance with applicable DOT permits and state and federal regulations. The proposed project will be performed in accordance with applicable permit requirements and state and federal regulatory requirements. Refer to Section 2.5 of the Draft EIR for a list of permits, approvals and other regulatory requirements identified for the proposed project. The DOT is also referred to Section 4.11 of the Draft EIR for information concerning the evaluation of potential transportation/traffic impacts associated with the proposed project. Based on the evaluation of project-related transportation/traffic impacts, no significant impacts to surrounding traffic patterns were identified.

COMMENT LETTER 4

**LOS ANGELES DEPARTMENT OF
TRANSPORTATION**

Letter # 4
FRANCES T. DANIELLES
GENERAL MANAGER

CITY OF LOS ANGELES
CALIFORNIA



RICHARD J. RIORDAN
MAYOR

DWP Electrical Generation Station
Modification Projects

DEPARTMENT OF
TRANSPORTATION
221 N. FIGUEROA STREET, SUITE 600
LOS ANGELES, CA 90012
(310) 580-1177
FAX: (310) 580-1188

December 27, 2000

Darren Stroud
Office of Planning, Rule Development, and Area Sources
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR PROPOSED LOS ANGELES
DEPARTMENT OF WATER AND POWER'S (LADWP) ELECTRICAL GENERATION
STATIONS MODIFICATIONS PROJECT**

The Los Angeles Department of Transportation (LADOT) has reviewed the DEIR for the proposed LADWP's Electrical Generation Station Modifications project for three sites in the City of Los Angeles and offers the following comments:

PROJECT DESCRIPTION

HARBOR GENERATING STATION SITE

The Harbor Generating Station (HGS) is located at 161 North Island Avenue in Wilmington. LADWP is proposing to install five 47-megawatt (MW) combustion turbines (CT) each with selective catalytic reduction system (SCR) at the Harbor Generating Station. Aqueous ammonia is used in the associated SCR to reduce NOx emissions. A pipeline will be installed to transport the aqueous ammonia from existing above ground storage tanks to the new combustion turbines. Existing petroleum product storage tanks at HGS site will be decommissioned and removed to make room for the new equipment.

SCATTERGOOD GENERATING STATION SITE

The Scattergood Generating Station (SGS) is located at 12700 Vista Del Mar in Playa Del Rey. LADWP is proposing to install SCR systems on three existing units to reduce NOx emissions at SGS. Aqueous ammonia is used in SCR systems to reduce NOx emissions. As there is currently no ammonia storage capacity at the SGS site, the project includes installation of three 30,000-gallon aqueous ammonia storage tanks.

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER



Darren Stroud

-2-

December 27, 2000

VALLEY GENERATING STATION SITE

The Valley Generating Station (VGS) is located at 9430 San Fernando Road. LADWP is proposing to install one 47-MW CT with SCR at the VGS site. Aqueous ammonia is used in the SCR system to reduce NOx emissions. As there is currently no ammonia storage capacity at the VGS site, one 20,000-gallon aqueous ammonia storage tank will also be constructed. Existing, out-of-service cooling towers at the VGS site will be demolished and removed to make room for the new equipment.

COMMENTS

HARBOR GENERATING STATION SITE

- 4-1 [LADOT concurs with the DEIR that there will be minimal traffic impact caused by the proposed project. Because the construction work schedule is expected to be from 6:00 AM to 4:30 PM for the first work shift and from 4:00 PM to 2:30 AM for the second work shift, the construction traffic is not expected to have a significant impact to the surrounding street network. In addition, since the construction work will be carried out over a seven days work week schedule instead of the regular five days work week schedule, LADOT concurs with the finding that the amount of construction traffic will not have a negative impact on the peak hour traffic and that a more detailed traffic study is not required. Also, LADOT recommends that prior to the start of construction, the contractor shall submit a construction worksite traffic control plan for review and approval to LADOT's Southern District Office at telephone (310) 732-4599. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties.
- 4-2 [

SCATTERGOOD GENERATING STATION SITE

- 4-3 [Because the construction and operational related traffic of this site will be less than that for the Harbor Generating Station site, LADOT concurs with the DEIR that no traffic mitigation is required for this site since there will not be any significant traffic impact. The contractor shall submit a similar construction worksite traffic control plan for review and approval to LADOT's Western District Office at telephone (310) 575-8138.
- 4-4 [

VALLEY GENERATING STATION SITE

- 4-5 [Because the construction and operational related traffic of this site will be less than that for the Harbor Generating Station site, LADOT concurs with the DEIR that no traffic mitigation is required for this site since there will not be any significant traffic impact. The contractor shall submit a similar construction worksite traffic control plan for review and approval to LADOT's East Valley District Office at telephone (818) 756-8441.
- 4-6 [

Appendix H – Responses to Draft EIR Comments

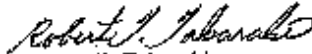
Darren Stroud

-3-

December 27, 2000

If you have any further questions, you may contact Ed Chow of my staff at (213) 240-3074.

Sincerely,


Robert T. Takasaki
Senior Transportation Engineer

cc:RTT_FILES\DWV.BPD

cc: Council District No. 6
Council District No. 7
Council District No. 15
East Valley District, DOT
Southern District, DOT
Western District, DOT
West LA Programs Section, DOT
Valley Programs Section, DOT

COMMENT LETTER 4: LOS ANGELES DEPARTMENT OF TRANSPORTATION

Response 4-1: The SCAQMD appreciates the Los Angeles Department of Transportation's (LADOT's) concurrence that the amount of construction traffic at the Harbor Generating Station will not have a negative impact on peak hour traffic and that a more detailed traffic study is not required.

Response 4-2: The SCAQMD acknowledges the LADOT's recommendation to prepare and submit a construction worksite traffic control plan to the LADOT prior to starting construction at the Harbor Generating Station. The LADWP will prepare and submit the traffic control plan to the LADOT as requested.

Response 4-3: The SCAQMD appreciates the LADOT's concurrence that the no traffic mitigation is required for the Scattergood Generating Station site as there will be no significant traffic impacts.

Response 4-4: The SCAQMD acknowledges the LADOT's recommendation to prepare and submit a construction worksite traffic control plan to the LADOT prior to starting construction at the Scattergood Generating Station. The LADWP will prepare and submit the traffic control plan to the LADOT as requested.

Response 4-5: The SCAQMD recognizes the LADOT's concurrence that the no traffic mitigation is required for the Valley Generating Station site as there will not be any significant traffic impacts.

Response 4-6: The SCAQMD acknowledges the LADOT's recommendation to prepare and submit a construction worksite traffic control plan to the LADOT prior to starting construction at the Valley Generating Station. The LADWP will prepare and submit the traffic control plan to the LADOT as requested.

COMMENT LETTER 5

CALIFORNIA COASTAL COMMISSION

Appendix H – Responses to Draft EIR Comments

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GRAY DAVIS, GOVERNOR

CALIFORNIA COASTAL COMMISSION

45 FIDMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2319
VOICE AND TDD (415) 904-5200
FAX (415) 904-5400

RECEIVED



01 JAN -2 P2 58

December 27, 2000

South Coast Air Quality Management District
Attention: Mr. Barry R. Wallerstein, D. Env.
Executive Officer
21865 East Copley Drive
Diamond Bar, CA 91765-4182

SCAQMD EXECUTIVE OFFICE	From: Office of the Executive Officer	Date: 1-2-01
	To: <i>E. Wallerstein</i>	
	For your action by: _____	For your info: _____
	Print response to: _____	Signature: _____

Re: Comments on Los Angeles Department of Water and Power's (LADWP) Electrical Generating Stations Modifications Project Draft Environmental Impact Report (EIR), SCH# 2009101008 for (a) Harbor Generating Station; (b) Scattergood Generating Station; and (c) Valley Generating Station.

Dear Mr. Wallerstein:

Coastal Commission staff has reviewed the Environmental Impact Report (EIR) for Los Angeles Department of Water and Power's (LADWP) proposal to modify operations at three generating stations in Los Angeles. The EIR outlines the LADWP's plans to: 1) install five 47-Mega-Watt (MW) combustion turbines (CTs) each with selective catalytic reduction (SCR) air pollution control systems at the Harbor Generating Station (HGS); 2) install SCR systems on three existing units at the Scattergood Generating Station (SGS); and 3) install one 47-MW CT with SCR at the Valley Generating Station (VGS).

The Coastal Commission has coastal development permit jurisdiction over the proposed projects at the HGS and the SGS facilities. These two projects therefore must be evaluated for their conformity with the Chapter 3 policies of the California Coastal Act. Our comments follow below:

GENERAL COMMENTS

5-1

1. A more detailed description of each proposed project is necessary to evaluate the proposed projects' consistency with the Coastal Act. For instance, please include aerial photographs, wetland delineations, and any other explanations of sensitive resources possibly affected by the proposed project.

5-2

2. The EIR should more thoroughly describe how LADWP would modify the drainage pattern, how the proposed project will effect surface and subsurface flow, and whether these alterations will involve contaminated soils. Will runoff and percolation take place over contaminated soils? Is pumping of wetlands currently taking place, and if so, at what rate? In summary, the EIR should explicitly address how waters of the State will be impacted by the proposed project.

Appendix H – Responses to Draft EIR Comments

*California Coastal Commission Comments on Los Angeles Department of Water and Power's (LADWP) Electrical Generating Stations Modifications Project Draft Environmental Impact Report (EIR), SCH# 2000101008
December 27, 2000
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- 5-3 3. Please explain the status of consultations with State and federal resource agencies such the U.S. Fish and Wildlife Service, the Regional Water Quality Control Board, the Department of Toxic Substances Control, and the California Department of Fish and Game.
- 5-4 4. The EIR should describe the nature of any temporary erosion and sediment control measures, or best management practices associated with these proposed projects.

HARBOR GENERATING STATION

- 5-5 5. Existing petroleum storage tanks at the HGS site will be decommissioned and removed to make room for new equipment. However, the EIR contains no description of how this activity will take place, and no analysis of the potential effects of decommissioning on coastal resources.
- 5-6 6. Given the EIR's emphasis on air quality improvements, and increased efficiency, it is unclear from the EIR why LADWP is proposing simple-cycle CT rather than more efficient combined cycle CTs. (2-9) Please explain this technological selection in the EIR.
- 5-7 7. The EIR makes a "conservative assumption" for the removal of 2,000 cubic yards of contaminated soil beneath oil tanks, but doesn't explain the basis for this assumption. (Pg. 2-10) Please explain this assumption in the EIR.
- 5-8 8. What four acres of land offsite will be affected by the construction and demolition activities, and are these acres in the coastal zone? (2-10)
- 5-9 9. Five new cooling towers, and an unnamed number of smokestacks will be constructed as part of the proposed project, but no discussion of visual impacts is included in the EIR. Please include a visual impacts analysis in the final EIR. (2-11)
- 5-10 10. The EIR states that "the sea water cooling system will not be modified by the proposed project." (3-39) Does this mean that intake and discharge will neither qualitatively nor quantitatively change? Will the temperature or volume of discharges change?
- 5-11 11. Discharge limitations for the constituents of concern presented in Table 3.8-1 appear high relative to State and federal water quality standards. Please clarify in the final EIR whether the proposed discharges will meet State and federal standards for chronic toxicity.
- 5-12 12. The EIR states that "minimal additional wastewater will be discharged to the municipal sewer. Please quantify "minimal." (4-9)

SCATTERGOOD GENERATING STATION

- 5-13 13. Is the impotability of the groundwater at the SGS related to the historic operation of the facility, and will this water quality status be exacerbated by the proposed project? (3-30)

Appendix H – Responses to Draft EIR Comments

California Coastal Commission Comments on Los Angeles Department of Water and Power's (LADWP) Electrical
Generating Stations Modifications Project Draft Environmental Impact Report (EIR), SCH# 2000101008
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- 5-14 14. The EIR states that "the sea water cooling system will not be modified by the proposed project." (3-39) Does this mean that intake and discharge will neither qualitatively nor quantitatively change? Will the temperature of discharges change?
- 5-15 15. The EIR states that "In accordance with the Thermal Plan, LADWP conducted a thermal effects study. The RWQCB-approved study demonstrated that wastes discharged from the SGS were in compliance with the Thermal Plan and the beneficial uses of the receiving waters." (3-52) When was this report produced? Is it available for Coastal Commission peer review? What is the current discharge's affect on coastal marine resources? Please cite studies and other source materials.
- 5-16 16. Discharge limitations presented in Table 3.8-2 appear high relative to State and federal water quality standards. Please clarify in the final EIR whether the proposed discharges will meet State and federal standards for chronic toxicity.

Thank you for the opportunity to comment on the proposed EIR. Feel free to call me at (415) 904-5249 or Alison Dettmer at (415) 904-5205 should you have any further questions about these comments.

Sincerely,



Michael Bowen
Coastal Permit Analyst
Energy & Ocean Resources Unit

COMMENT LETTER 5: CALIFORNIA COASTAL COMMISSION

Response 5-1: The Draft EIR includes a comprehensive project description that meets the requirements set forth in the CEQA Guidelines § 15124. The Draft EIR describes the project location, including site maps and site plans, as well as a description of the equipment and modifications proposed at the three generating stations.

As discussed in the Draft EIR, the proposed project includes modifications that are similar in nature to the current uses and are consistent with the current land use provisions. Proposed project actions at the Harbor Generating Station and the Scattergood Generating Station will be conducted within the confines of the existing facilities that have been operable for approximately 50 years. Other than boring a two-inch pipeline under a two-lane road, no offsite improvements are proposed as part of the project. The proposed project will not result in the encroachment of wetlands or other sensitive receptors.

Response 5-2: The proposed project improvements will occur within existing facilities. As stated in Section 4.8.4 of the EIR, stormwater will be controlled, and neither surface water or groundwater resources will be adversely affected. Refer to Section 4.10.2 of the EIR which states that in the event that contaminated soils are encountered during the project site construction-related activities, the soils will be managed in accordance with all applicable local, state and federal rules and regulations.

Response 5-3: The proposed project permitting process is being handled by the applicant and consultations with state and federal resources agencies are being conducted. It should be noted that the proposed project improvements will be conducted at existing facilities, resulting in little or no impacts to the environmental resources under the purview of the resource agencies listed in the comment. The commentator is referred to section 2.5 and Table 2.5-1, which identifies permits, approvals, and other requirements applicable to the proposed project and the actions taken to meet these requirements. All appropriate agencies were sent notices regarding the availability of the Notice of Preparation/Initial Study and the Draft EIR.

Appendix H – Responses to Draft EIR Comments

Response 5-4: A Construction Stormwater Pollution Prevention Plan, which meets the State of California permit requirements, will be developed and implemented for the construction activities associated with the proposed project.

Response 5-5: The existing petroleum storage tanks will be decommissioned and removed in accordance with applicable regulations. These activities are not expected to significantly impact coastal resources. Sections 2.4.1 and 4.10.2.1 of the Draft EIR include an analysis of the possible effects of construction in the Harbor Generating Station tank farm. Each of the environmental area analyzed also includes a determination of whether construction activities, which includes tank decommissioning, would have a significant adverse effect on the environment.

Response 5-6: The LADWP has proposed simple-cycle CTs rather than combined-cycle CTs because the simple-cycle CTs can be brought up to full load in a shorter time period. This is important to the LADWP's ability to provide service in a time of need.

Response 5-7: As stated in the Draft ER, it was estimated that as a worst-case scenario approximately 2,000 cubic yards of contaminated soil may be located beneath the existing Harbor Generating Station storage tanks and may require excavation as a result of the proposed project. This estimate was determined by calculating the dimensions of the tank bottoms and potential contamination depth. However, as stated in Section 4.10.2.1 of the Draft EIR, soil assessment activities conducted at the Harbor Generating Station indicate minimal impacts to soil and groundwater from past operations.

Response 5-8: The four acres of offsite land associated with the Harbor Generating Station is located within the coastal zone (see Figure 2.3-4 for exact location); however, this area will only be used for temporary equipment staging and parking during construction activities. The temporary use of the four acres of land will not result in a significant impact to the land.

Response 5-9: As determined in the Initial Study, the proposed modifications will occur within the existing Harbor Generating Station and will be consistent with the current visual characteristics of the Station. The Harbor Generating Station is located in a highly industrialized area. The predominant land uses include container storage, petroleum storage, bulk handling of petroleum coke,

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coal, sulfur, etc. As discussed in the Initial Study and Draft EIR, the new exhaust stacks will replace aboveground fuel storage tanks. This replacement is not expected to have a substantial adverse effect on a scenic vista, substantially degrade the existing visual character of the site and its surroundings, or create a new source of substantial light or glare. Therefore, the proposed project will not result in significant adverse visual impacts in the harbor area.

Response 5-10: Based on information provided by the LADWP to the Regional Water Quality Control Board (RWQCB), the Harbor Generating Station sea water cooling system intake and discharge will not change qualitatively or quantitatively as result of the proposed project. In addition, the temperature of the discharge of the sea water cooling system will not change as a result of the proposed project.

Please also note that RWQCB provided comments in response to the Notice of Preparation/Initial Study (NOP/IS) for the proposed project. The data requested in the comments on the NOP/IS by RWQCB are included in the Draft EIR. RWQCB did not submit comments on the Draft EIR.

Response 5-11: The discharge limitations listed in Table 3.8-1, including the chronic toxicity limitation, are contained in the current NPDES permit. These discharge limitations were established by the RWQCB based on the State California Ocean Plan under which the facility is regulated. As previously stated, the project will not result in a change to the discharge at the facility.

Response 5-12: The quantity of the additional wastewater, which will be discharged to the municipal sewer system from the Harbor Generating Station, is not available at this time as final facility engineering is being completed. However, based on experience with similar projects, the quantity of additional wastewater is not expected to result in a significant impact to the municipal sewer system. It must be noted that prior to operation, LADWP must receive a discharge permit from the City of Los Angeles. Conditions would be placed in the permit such that any discharge to the municipal sewer system from the proposed project meets all requirements of the City of Los Angeles.

Response 5-13: As the Scattergood Generating Station is located adjacent to the coast, shallow groundwater beneath the station is not potable due to the

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salinity of the groundwater. The proposed project activities are not expected to impact groundwater at the site.

Response 5-14: Based on information provided by LADWP to the RWQCB, the Scattergood Generating Station sea water cooling system intake and discharge will not change qualitatively or quantitatively as result of the proposed project. In addition, the temperature of the discharge of the sea water cooling system will not change as a result of the proposed project.

Response 5-15: The LADWP Thermal Plan study was performed by LADWP from November 1971 through November 1972. The requirements for the study and technical report were formulated by the RWQCB. All field work and analyses were carried out in accordance with specifications provided by the RWQCB. The report was finalized in April of 1973 and submitted to the RWQCB. Upon the finalization of the study report, the RWQCB reviewed the report and concluded that “the waste discharges from the power plant are in compliance with the state Thermal Plan and beneficial uses of the receiving waters are protected as required by Section 316(a) of the Clean Water Act.” The Thermal Plan is on file with the RWQCB and a copy is available at LADWP.

As previously stated, the proposed project will not result in a modification to the quality or quantity of the sea water cooling system discharge which has not changed since the time the Thermal Plan study was performed. In addition, the facility’s NPDES permit requires annual monitoring of the receiving water environment (including temperature evaluations) to ensure that continued operation of the facility has not impaired water quality or the beneficial uses.

Response 5-16: The discharge limitations listed in Table 3.8-2, including the chronic toxicity limitation, are contained in the current NPDES permit. These discharge limitations were established by the RWQCB based on the State California Ocean Plan under which the facility is regulated. As previously stated, the project will not result in a change to the discharge at the facility.