13 May 2010

Brian Harms
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NOTICE OF VIOLATION, GEOTHERMAL STEAM CONDENSATE SPILLS, BOTTLE ROCK POWER, LLC, LAKE COUNTY

Central Valley Water Board staff has reviewed spill reports dated 6 and 7 April 2010 that describe spills of geothermal steam condensate from the Bottle Rock Power Plant in Cobb. The spills are described as follows:

- The 6 April 2010 report describes a spill of geothermal steam condensate estimated at approximately 800 gallons that occurred on 23 March 2010 from the vent system piping located just outside the plant gate. The majority of the spill was contained within a concrete lined drainage ditch. The spill was caused by a leak in a threaded elbow pipe connection and that repair to the pipe connection consisted of welding the pipe connection to reduce the chance of future leaks. Cleanup efforts included removal and disposal of the affected soil in the drainage ditch. In addition, the spill area was washed down and a vacuum truck was used to collect the wash water. The report states that the pipelines will be routinely walked and inspected to determine any areas in the piping system that could develop into potential leaks.

- The 7 April 2010 report describes a spill of geothermal steam condensate estimated at approximately 700 gallons that occurred on 24 March 2010 from a rock muffler sump. The spill report states that approximately 350 gallons of geothermal condensate was captured by a concrete spill containment berm, while the remainder of the spill entered the soil surrounding the rock muffler sump. Following the spill, a stand-by pump was used to prevent the rock muffler sump from continuing to overflow. The spill was caused by malfunctioning sump pump level switches. The spill report states that cleanup efforts included: (a) the collection and storage of approximately 15 cubic yards of soil and removing the liquid that soaked into the soil, and (b) washing down the area and collecting the wash water via a vacuum truck. The spill report states that procedures have been modified to include daily inspections of the sump and conduct additional inspections when the steam stacking system is operational. Finally, the spill report states that more frequent preventative maintenance on the pump level switches will be performed and additional spill containment around the rock muffler sump is being evaluated.
These spills are violations of Discharge Prohibition No. A.3 of Waste Discharge Requirements (WDRs) Order No. 99-091 which states: “There shall be no disposal, storage, treatment, or transport of wastes into facilities which are not described within this Order or which are not properly permitted by a Regional Board.”

Geothermal steam condensate spills are serious violations of your WDRs and can lead to further enforcement actions, such as fines. Please be advised that preventative maintenance is necessary to ensure that future spills do not occur.

If you have questions regarding this Notice, please contact Guy Childs at (916) 464-4648.

ANNE L. OLSON, P.E., Chief
Senior Wastewater Control Engineer
Waste Discharge to Land Compliance Unit

cc: Marie Ivanovna Buric, Department of Water Resources, Sacramento
    Raymond Ruminski, Lake County Environmental Health Department, Lakeport
    Cheri Kendrick, Bottle Rock Power, LLC., Cobb

CIWQS Violation ID Nos. 868041, 868042

gjc: 13 May-10