

CALIFORNIA ENERGY COMMISSION1516 NINTH STREET
SACRAMENTO, CA 95814-5512

July 20, 2000

Mr. Daniel Dickinson
Director-Project Development
Wisvest Corporation
N16 W23217 Stone Ridge Drive, Suite 100
Waukesha, WE 53188

Dear Mr. Dickinson:

BLYTHE ENERGY PROJECT (BEP) DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This fourth set of data requests (#201-214) is being made in the areas of, air resources, public health, and water and soil. Written responses to the enclosed data requests are due to the Energy Commission staff on or before August 18, 2000, or at such date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner William Keese, Presiding Member of the Committee for the Blythe Energy Project proceeding, and to me, within 15 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations section 1716 (e)).

If you have any questions regarding the enclosed data requests, please contact me at (916) 653-1227 or e-mail lshaw@energy.state.ca.us.

Sincerely,

Lance Shaw
Energy Facility Siting Project Manager

Enclosure

cc: pos

Blythe Energy Project
Data Requests
(99-AFC-8)

Technical Area: Air Quality

Author: Gabriel D. Behymer

BACKGROUND

In data request #134, staff asked the applicant to collect ambient ozone data in Blythe. The applicant indicated their belief that data request #134 was not reasonable and not necessary for a complete staff evaluation. The ambient ozone concentration in the Blythe area has not been directly monitored since 1992 (Blythe Energy Project AFC, Section 7.7.7, pg. 7.7-23). In that year, the maximum 1-hour average ambient ozone concentration equaled the California State Standard. If the current ambient ozone concentration exceeds the State Standard, ozone precursor emissions from the proposed project may be significant. Thus, in order to determine the significance of the potential impacts of the proposed emissions from the Blythe Energy Project, staff requires information regarding the current ambient ozone levels in the Blythe area.

Since the data is not reasonably available directly, and after negotiations with the applicant, staff requests the applicant prepare an estimation of the current ambient ozone levels in Blythe based on the 1992 data collected in Blythe and currently available data from surrounding ambient air monitoring stations. This data request will provide the necessary ambient ozone data and thus it will replace data request #134.

DATA REQUEST

201. Please prepare a draft protocol for an analysis (for example, a trend study and statistical estimation) of the present ambient ozone levels in the Blythe area to be submitted to the Energy Commission staff for review and approval. Once Blythe Energy finalizes the protocol and it is approved by Energy Commission staff, please follow the protocol and submit all deliverables. At a minimum, please include the following in the draft document:
- a) A complete list of Federal, State and District maintained ambient air monitoring stations in the South Coast Air Basin, Salton Sea Air Basin and Mojave Desert Air Basin that could potentially be a source of ambient ozone data. Please also include on this list all State, Federal and Air District stations in Arizona that are within 100 miles of Blythe.
 - b) A list delineating which of the above listed ambient air monitoring stations the applicant proposes to include in the analysis. Please provide a technical justification for each station within 100 miles of Blythe **not** recommended for inclusion in the proposed protocol.
 - c) A proposed protocol for producing the following values regarding the ambient air quality in the Blythe area, and a technical justification for each:
 - i) Estimated number of days per year that violate the California State Standard for maximum 1-hour average ambient ozone,
 - ii) Maximum 1-hour average ambient ozone concentrations, and
 - iii) A level of confidence on each of these values.
 - d) Indication that electronic copies of all input data files will be provided as part of the list of deliverables.

Blythe Energy Project
Data Requests
(99-AFC-8)

Technical Area: Public Health

Author: Mike Ringer

BACKGROUND

On June 27, 2000, Blythe Energy, LLC submitted an additional clarification to staff data request 60. This clarification included a revised health risk assessment which used new emission factors published by the U.S. EPA in AP-42. The resulting emission rate for formaldehyde is shown in attachments 60-A and 60-B. Preliminary calculations by staff based on the revised emission rate indicate that the amount of formaldehyde emitted on a yearly basis could exceed ten tons. If correct, this would cause the Blythe Energy Project to be classified as a major Hazardous Air Pollutant source under section 112 of the Clean Air Act, and would require the installation of Maximum Achievable Control Technology for toxics.

DATA REQUEST

202. Please provide a Maximum Achievable Control Technology (MACT) analysis for the staff, District, and EPA for review, or propose measures to ensure that HAP emissions will be limited so that the section 112(g) requirement is not triggered.

Blythe Energy Project
Data Requests
(99-AFC-8)

TECHNICAL AREA: Water and Soil

Author: Linda D. Bond and Richard Sapudar

BACKGROUND

Well drawdown, potential well interference and measureable changes in groundwater gradients near the project wells, is primarily determined by the localized aquifer conditions, rather than the average regional aquifer conditions.

DATA REQUEST

203. Please provide an analysis of calculated drawdown that would be caused by project pumping based upon using localized aquifer conditions for Palo Verde Mesa. These aquifer conditions should be based upon available data from aquifer tests, well logs, well capacity tests, and other previous hydrogeologic studies for the area.

BACKGROUND

More information is needed to evaluate the representation of aquifer conditions and results of the groundwater model.

DATA REQUEST

204. Please provide an electronic copy of the input and output files for the groundwater model that was developed for the groundwater modeling study submitted in AFC Appendix 7.13.

BACKGROUND

Based on the storage coefficient values (an average of 32% and a range of 20% to 40%) discussed in the Technical Appendix 7.13 of the AFC, it appears that the aquifer has been modeled as an unconfined aquifer.

DATA REQUEST

205. Please explain the basis of this assumption and substantiate the storage coefficient value(s) used in the model.

BACKGROUND

As reported in Appendix 7.13 of the AFC, a steady-state calibration of the groundwater model, which would have provided initial heads for the model, was not achieved.

DATA REQUEST

206. In the absence of a steady-state calibration, please explain how you developed initial head conditions for the model. Additionally, please provide both a description and a figure that show the initial head conditions used for the groundwater model.

Blythe Energy Project
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(99-AFC-8)

BACKGROUND

As reported in Appendix 7.13 of the AFC, the groundwater model included the effects of local agricultural groundwater usage. It appears that pumping for the city of Blythe and other small municipalities was not considered in the model.

DATA REQUEST

207. Please clarify whether the model includes municipal pumping. If it does not include municipal pumping, provide a revised analysis that includes pumping for Blythe, the Mesa Verde community, the Blythe Airport, the golf course and the new college.
208. Figure 19 of Appendix 7.13 of the AFC shows the location of pumping wells represented in the model. Please identify the wells, the well owners/users, water use, and amount of water pumped from each well or well system represented in the model. The well identification should include the communities of Blythe, Mesa Verde, the new college site, the Blythe Airport, the golf course and any other wells within a one mile radius of the project.
209. According to the groundwater modeling analysis performed, explain whether pumping drawdown for the project will reach steady state conditions during the life of the project.
210. According to the groundwater modeling analysis performed, explain what proportions of the groundwater produced by the project wells would come from (1) stored groundwater, (2) captured recharge from precipitation, (3) induced recharge from the Colorado River and/or (4) other sources over the life of the project.
211. Please describe your method of analysis and provide a plot showing the source(s) of water for pumping during the life of the project and the source(s) of water for recovery of the aquifer following plant closure.

BACKGROUND

More information is needed to evaluate the potential for groundwater solute transport from the Blythe Airport closed landfill and the old mobile home site. In a response dated May 27, 2000 to staff data request number 125 applicant provided additional analytical data for groundwater quality. Additional detail is needed to locate the landfill relative to the wells sampled, to understand the construction of these wells, and to define the groundwater gradient in this area relative to the project.

DATA REQUEST

212. Please provide a map with sufficient detail to accurately locate the project site in relation to the landfill, the old mobile home site, and any other actual/potential contaminant sources. This includes the wells used to obtain the groundwater samples and analytical results in the response to this data request. Provide the linear distances between these features.

Blythe Energy Project
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213. Provide details on the wells used to obtain the groundwater samples (or text references if the information has already been provided), including the type of well, well depth, screened intervals, depth to water, well construction details, and any other information available, such as yield, drawdown, transmissivity, or hydraulic conductivity.
214. According to the groundwater modeling analysis performed, please provide an analysis of groundwater gradients induced by project pumping between the two potential contamination sites (mobile home and landfill) and the project wells.