

**UNITED GOLDEN GATE POWER PROJECT
DATA REQUESTS
(00-AFC-5)**

November 8, 2000

Mr. Jesse D. Frederick
WZI, Inc.
4700 Stockdale Hwy, Suite 120
Bakersfield, CA 93389

PHASE I UNITED GOLDEN GATE POWER PROJECT DATA REQUESTS

Dear Mr. Frederick:

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.

Enclosed are data requests in the area of air quality, biological resources, cultural resources, geology and paleontology, land use, noise, the project description, transmission system engineering, soil and water resources, and visual resources. Written responses to the enclosed data requests are due to the Energy Commission staff on or before December 3, 2000. Because this project is being considered under a four-month expedited schedule, staff requests that responses that are complete be submitted on a weekly basis. Staff has scheduled a Data Request Workshop in South San Francisco on November 16, 2000.

If you are unable to provide the information requested, need additional time to provide the information, or object to providing it, you should send a written notice both to Commissioner Robert Laurie and to me within five days of receipt of this notice. We realize this is shorter than the time specified in the Energy Commission's regulations, but it is necessary to meet the expedited schedule. 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 call me at (916) 654-4678.

Sincerely,

Kevin M. Kennedy
Energy Facility Siting Project Manager

Enclosure

cc: Phase I United Golden Gate Power Project Proof of Service List
Docket (00-AFC-5)
Will Travis, Executive Director, San Francisco Bay Conservation and Development Commission

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TECHNICAL AREA: Air Quality
AUTHOR: Will Walters

BACKGROUND

In the AFC, the applicant has concluded that the air quality impacts from project construction will be insignificant. The basis of this conclusion is questionable because the construction emission calculations appear to be incorrect and the modeled impacts presented in Table 5.1-12 of the AFC show NO₂ and PM₁₀ impacts above the limiting standards. Staff needs clarification of the construction and modeling assumptions and additional modeling impact analysis to quantitatively determine whether there are significant air quality impacts from project construction.

DATA REQUEST

1. The sulfur dioxide emission estimate appears to use a diesel sulfur content of approximately 0.25% (Appendix M-2, page 4). Please revise the sulfur dioxide emission calculations to use a fuel sulfur content of 0.05%, which is the maximum diesel fuel sulfur content allowed by law.
2. The NO_x emission factor used for the front end loader/backhoe diesel (Appendix M-2, page 4) appears to be too low. Please review this emission factor. The emission factors and subsequent emission calculations for the light tower and space heater are missing (Appendix M-2, pages 4-9). The emission factors presented for the gasoline equipment appear to reflect diesel emission factors. Please review all of the construction emission assumptions and calculations presented in Appendix M-2, revise the appropriate fuel choice assumptions as necessary, and make any other necessary corrections.
3. Please provide a clear description regarding how the equipment operating hours and monthly emissions were determined. Specifically, the first page of Appendix M-2 states that the maximum monthly emissions are calculated by multiplying the hourly emissions by 160 hours; however, the equipment operating hours listed in page 3 of Appendix M-2 has some equipment operating at 192 hours per month.
4. What is the expected daily and weekly construction schedule? Is the construction schedule limited by local noise regulations/ordinances, or other local regulations? If so please indicate this limitation in the construction impact discussion. Does the anticipated construction schedule conform to the assumption of 160 hours per month provided in Appendix M-2?
5. The construction schedule currently assumes construction begins prior to the Certification of the AFC or the issuance of an Authority to Construct by the Bay Area Air Quality Management District (BAAQMD). Based on the applicant's response to the BAAQMD (WZI letter dated October 16), the applicant understands that they cannot commence construction until after receiving the appropriate pre-construction permits. Please revise the schedule and resulting hourly and monthly emissions to begin construction after Certification of the AFC.

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Any revisions to the construction schedule must still allow the project to be put into service by August 1, 2001, in order to be certified under the expedited permitting process of §25552 of the Public Resources Code.

6. The modeled construction emission concentrations are added to the highest ambient concentrations found within the last three years at either of the two closest ambient monitoring stations. For a more appropriate assessment, staff recommends that the construction impacts be added to the highest background levels occurring during the months of peak construction activity. Please revise the total impact modeling assessment using background data for the appropriate months based on the construction schedule as currently planned.
7. The construction modeling impact analysis shows high concentrations of resulting nitrogen oxides (NO_x) and particulate matter less than 10 microns in size (PM₁₀). Please provide a more thorough modeling analysis that eliminates conservative assumptions used during the modeling analysis (i.e. use temporal factors as appropriate, use additional point sources to model the construction equipment, etc.) to provide for more realistic near field modeling results. A thorough construction PM₁₀ emission estimate using specific emission estimates for the activities expected during construction might provide a more reasonable emission estimate. A short-term NO/NO₂ ratio or Ozone Limiting Method (OLM) approach should be used to determine maximum NO₂ concentrations. The revised modeling analysis must be performed using any corrected emission values.
8. Please provide a reference or calculations for the assumed stack temperature and velocity used in the construction modeling analysis. These values are lower than expected for construction vehicle exhausts.
9. Table 5.2-10 provides inconsistent lb/hr and ton/yr values for the soil preparation/construction PM₁₀ emissions. Please correct these values as necessary, including consideration of necessary changes to the construction schedule. Additionally, the modeled soil preparation area source emissions appear to be too high based on the hourly emissions presented in Table 5.2-10. The modeled value of 0.000189 g/s/m² located within an area source of 50 meters by 125 meters would appear equal to a PM₁₀ emission rate of 9.38 lbs/hr, while a value of 2.1 lbs/hr is provided in the referenced table.
10. Appendix M-2 provides a conversion factor of 0.60 to convert total suspended particulate (TSP) emissions to PM₁₀ emissions. This conversion factor appears to be overly conservative. AP-42 Section 13.2.4 provides a conversion factor of 0.35, and the grading factor provided in AP-42 Section 11.9 is 0.60 for conversion of PM₁₅ to PM₁₀, which would indicate a significantly lower conversion for TSP to PM₁₀. Please provide a reference for this factor, or correct it to a more supportable value.

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BACKGROUND

The AFC contains inconsistencies and errors. Staff needs clarification and correction of specific information provided to assess the application.

DATA REQUEST

11. The background concentration data in Table 5.2-12 is provided with a citation to a monitoring station that is not appropriate for this project. Please confirm the data in the table is from an appropriate monitoring station, and provide a correct citation and corrected data, if necessary.
12. Please provide the sulfur content and the lower heating value (LHV) of the natural gas to be used at the site, and the assumed maximum hourly, daily and annual fuel consumption. The sulfur dioxide emission estimates presented are approximately four times higher than expected based on the U.S. Environmental Protection Agency (EPA) sulfur dioxide emission factor of 0.6 lbs/MMcuff.
13. The AFC appears to use the terms volatile organic compounds (VOC) and precursor organic compounds (POC) interchangeably. Please confirm that the terms are consistently meant to refer to the BAAQMD POC definition. Additionally, for the purposes of confirming POC emission calculations, what molecular weight was used when converting from fraction to weight (i.e. ppm to lb/hr)?
14. The AFC provides a NO_x emission limit that is variously stated at 3 ppm and 5 ppm. For example in Section 5.2.3.3.6 a limit of 3 ppm is provided, while in Section 3.4.3.3 a limit of 5 ppm is given. In Appendix M-7 (BAAQMD Application for Authority to Construct (ATC)) the emission calculations appear to be based on 3.0 ppm, while the proposed condition in the same document asks for a limit of 5.0 ppm. Please confirm the NO_x emission limit and identify averaging periods, if the limit is desired to vary based on averaging periods.

BACKGROUND

In the AFC, the applicant has concluded that the air quality impacts from project operation will be insignificant. Staff needs clarification of specific technical issues to complete the review of the air quality impact analysis.

DATA REQUEST

15. Please confirm the urban/rural classification of the site by providing area estimates of the Auer land classifications located within 3 kilometers.
16. Please provide the expected operating schedule for the turbine and relate that to the emission case selected for emission calculation based on the meteorological conditions expected during the time of year that the turbine will be operating (i.e. temperature and relative humidity). Please provide a clear presentation of the operating case(s) selected for emission calculations for lb/hr, lb/day and annual

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emissions. It appears that the low ambient temperature assumed, based on the five years of met data provided, does not normally occur during the annual operating schedule timeframe for this project.

17. The annual emission calculations are based on operating 4,000 hours/year. Is this a reasonable assumption considering the ISO conditions of operation? Please coordinate the operating conditions with what is allowable under the ISO agreement.
18. The modeled operating emission concentrations are added to the highest ambient concentrations found within the last three years at either of the two closest ambient monitoring stations. For a more appropriate assessment, staff recommends that the operational impacts be added to the highest background levels based on the planned operational schedule. Please revise the total impact modeling assessment by using the appropriate months background data to the appropriate modeled impact.
19. The start-up conditions for carbon monoxide (CO) and POC emissions are unclear. Please provide a clear emission estimate for all pollutants during startup including the assumed ambient conditions that occur during startup (i.e. temperature and relative humidity). The start-up emissions for CO are currently shown to be lower than those during base load, which is not normally the case for turbine start-up. Please provide additional technical backup or vendor data to confirm this condition.
20. Please identify the Oxidation and SCR catalyst systems to be used and the performance characteristics for their anticipated operating temperature range.
21. Please provide a list of the buildings used in the downwash analysis, with their dimensions; and a corresponding scale figure that clearly shows the location of each of these building along with the location of the site.
22. Please provide calculations that convert exhaust ppm values to lb/hr values for the cases listed in the LM-6000 emission performance spreadsheet provided in Appendix M-3. This spreadsheet does not provide a conversion of exhaust SCFM to CFM @ 15% O₂, so Staff cannot duplicate the emission calculations.
23. The PM₁₀ lb/hr emission data provided in the LM-6000 performance data spreadsheet appear to be based on the LHV heat input rate, while AP-42 Table 3.1-2a indicates that the emission factor is referenced to a HHV of 1,020 Btu. Please clarify or correct the PM₁₀ emission calculations.
24. Please provide a revised modeling analysis for all pollutants that have had their emission estimates revised from those presented in the original AFC.

BACKGROUND

The Applicant has indicated that they would conduct a **cumulative** impact analysis.

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25. Please submit the cumulative modeling analysis including the input data for the projects included in the analysis (i.e. within 6 miles of the project site).

BACKGROUND

It is staff's understanding that the Applicant is not required to provide emission offsets per the BAAQMD's rules for NOx and POC. However, the project will emit these ozone precursor emissions, very likely during days when the ambient ozone levels in the BAAQMD will be at or above the state and/or federal ozone standards. To certify this project, the Commission will have to find under Section 25552(d)(2) of the Public Resources Code, that "The thermal powerplant and related facilities will not have a significant adverse effect on the environment as a result of **construction** or operation." Staff needs to understand the Applicant's perspective as to how the emissions of ozone precursors during the "ozone season" will NOT constitute a significant adverse effect on the air quality environment.

DATA REQUEST

26. Please provide a discussion of how the project's ozone precursor emissions do not constitute a significant adverse effect on ambient ozone levels, especially since the project's emissions are likely to occur during the height of the ozone season.
27. Please also discuss the implications of "non-offset" ozone precursor emissions from the UGGP on the BAAQMD's efforts to reach attainment of the federal ozone standard in 2001 and/or 2002, the current timeframe goals of the Bay Area Ozone Attainment Plan.

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TECHNICAL AREA: Biological Resources
AUTHOR: Linda Spiegel and Brad Norling

BACKGROUND

The United Golden Gate Phase I site is located near sensitive habitats including the Hayward Marsh (AFC pg 3.3-2), a wetland (AFC pg 3.3-3), and the West Bayshore Property, known to support populations of San Francisco garter snake and California red-legged frogs. Staff intends to meet with US. Fish and Wildlife Service and California Department of Fish and Game in the very near term to get concurrence that this project will not require consultation. These meetings would be greatly facilitated with a clear aerial photo of the site and vicinity showing the location of the project in relation to these habitats.

DATA REQUEST

28. Please provide a color infrared aerial photo of the site at a scale of 1 inch equals 500 feet. Clearly delineate the locations of the project site and sensitive habitats mentioned above.

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TECHNICAL AREA: Cultural Resources
AUTHOR: Gary Reinoehl

BACKGROUND

The AFC (page 5.7-1) states, "The study area includes the approximately 112,500 square foot SFIA/UCI site and a 1 mile radius." The section covering previous studies does not describe the quantity or location of prior studies within the study area. Staff needs the following information to complete the analysis.

DATA REQUEST

29. Please provide a description of the areas previously surveyed for cultural resources within the study area and the results of those surveys. Please include a 1:24,000 scale USGS topographic map that depicts the SFIA/UCI site, the 1 mile radius, the boundaries of the previously surveyed areas, and the location of the identified resources.

BACKGROUND

The AFC and supplement provided documentation of letters sent to Native Americans that might have an interest in or knowledge of cultural resources in the project area.

DATA REQUEST

30. Please provide copies of any responses received from Native Americans. If the responses were by telephone, please provide a summary of the responses.

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TECHNICAL AREA: Geology and Paleontology
AUTHOR: Robert Anderson

There are no data requests or issues for the areas of geological hazards, geological resources, or surface water hydrology.

BACKGROUND

The Energy Commission acknowledges that paleontological resources are not likely to be encountered during the construction and operation of the current project. Nevertheless, Energy Commission siting regulations require that a map showing the location of known paleontological resources be submitted as a confidential submittal to the Energy Commission.

DATA REQUEST

31. Please provide a paleontological resources location map (a geological map showing the project site location, linear facilities, and the location of known paleontological resources within two miles of the project), for the project at a scale of 1:24,000. The map is to show the locations of paleontological resources identified near the site by the applicant's consultant. The map is to be submitted to the Energy Commission under Title 20 of the California Code of Regulations requirements for confidential submittals.

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TECHNICAL AREA: Land Use
AUTHOR: Amanda Stennick

BACKGROUND

Section 1.4.3 of the AFC states that the site will be leased by El Paso from United Airlines. If this parcel or any other parcel is to be created for the purpose of lease, sale, or finance, the creation of the parcel must comply with the Subdivision Map Act, the agency of jurisdiction's Land Division Ordinance, and the SFIA Master Plan and Airport Commission.

DATA REQUEST

32. (a) For CEC staff to ensure that local and state LORS are met, please provide the following:

- i) A **completed** application for a parcel map from the agency of jurisdiction.
- ii) An estimation of when the local agency will consider the application for approval.
- iii) Submittal of evidence of compliance with the Map Act and local land division ordinance from the Airport Commission.

(b) If the applicant believes that the creation of this parcel for the purpose of lease, sale, or finance is exempt from compliance with the Subdivision Map Act, please provide written evidence citing the applicable statute, code, or regulation. In addition, please provide written evidence from the agency of jurisdiction citing the applicable statute, code, or regulation as to why the project is exempt from its Land Division Ordinance.

BACKGROUND

Sections 5.9 of the AFC and Supplemental Information state that San Francisco Bay Conservation and Development Commission's (BCDC) "plans" were reviewed, yet there is no discussion in the AFC as to whether the project complies with BCDC's San Francisco Bay Plan and the Designation of Areas Within the Jurisdiction of the San Francisco Bay Conservation and Development Commission That Are Unsuitable for Power Plants (Non-Siting Study). BCDC sent a letter to Energy Commission staff stating that both Phase I and Phase II power plants would be located within the airport priority use area as defined by the Non-Siting Study. The letter also notes that siting of power plants in these areas would be inconsistent with the Non-Siting Study because they are not an airport priority use. A copy of this letter is attached. BCDC included data requests relating to both Phases of the United Golden Gate Project. Energy Commission staff are passing along BCDC's requests as they relate to the Phase I proposal currently before the Commission. Similar requests will be forwarded on behalf of BCDC on the second phase of UGGPP if the issues are not addressed in that AFC.

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33. To better enable BCDC and Energy Commission staff to determine whether the proposed facilities are an “airport related use” please provide information on the following:
- i) What population or industry is the project intended to serve?
 - ii) How many megawatts from the project would be directed to the Airport and for what purpose(s)?
 - iii) How many megawatts from the project would be directed outside of the Airport and for what purpose?
 - iv) How would the project contribute to the Airport’s operations?
34. Please discuss how the project would impact the development of a bicycle trail by BCDC to provide public access.

BACKGROUND

In addition to being situated within BCDC’s airport priority use area, it is not clear from the maps provided in the AFC and Supplement whether the project is within BCDC’s jurisdictional boundary (section 66610 of the McAteer-Petris Act).

DATA REQUEST

35. In order to determine whether the project is within this area please provide map drawn to scale showing the footprint of the project and the jurisdictional boundary of BCDC.

BACKGROUND

Section 5.9.2.4 of the AFC states that the project is consistent with the existing land use plans, policies, and regulations as defined in the SFIA Master Development Plan; section 5.9.2.3 of the AFC states that the SFIA Master Plan indicates that power plants are compatible adjacent land uses to other planned industrial activities within the SFIA.

DATA REQUEST

36. For Energy Commission staff to determine the compatibility of the proposed project with LORS, please provide a copy of the SFIA Master Plan. If the plan is being updated, please provide a copy of the adopted plan and the draft plan.

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TECHNICAL AREA: Noise
AUTHOR: Thomas M. Murphy

BACKGROUND

Page 5.12-1 of the AFC describes the nearest receptor as being at least 1/2 mile from the project site. However, on page 5.12-2 it indicates that the nearest receptor is at least 3/4 mile from the project site. Staff needs clarification on this issue.

DATA REQUEST

37. Please identify the distance (in feet) the nearest sensitive and residential receptors are from the proposed project site.

BACKGROUND

Page 5.12-8 indicates that there will be steam blows associated with the construction of the project. However, it is Staff's understanding that there will not be any HRSG or STG packages associated with Phase I of the project. Staff needs clarification on this issue.

DATA REQUEST

38. Please describe why LT-1 was selected. It is staff's opinion that a more representative site would have been one of the R-1 receptors in Figure 5.9-1 or the school location in Figure 5.9-2. Please describe what the noise levels would be at the receptors (i.e., R-1, School) identified in Figures 5.9-1 and 5.9-2.

BACKGROUND

Page 5.12-2 indicates that the noise measurements at LT-1 were taken at a height of 15 feet above the ground. Typically, noise measurements are taken at a height of 5 feet, which would be the average height a human ear is above ground. Staff needs clarification on this issue.

DATA REQUEST

39. Describe why the noise measurements at LT-1 were taken at a height of 15 feet above the ground. Unless there is a good reason for the noise measurement height, it is Staff's opinion that the noise measurements should be revised to reflect a more appropriate noise monitoring height.

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BACKGROUND

Page 5.12-8 indicates that there will be steam blows associated with the construction of the project. However, it is Staff's understanding that there will not be any HRSG or STG packages associated with Phase I of the project. Staff needs clarification on this issue.

DATA REQUEST

40. Please explicitly confirm that no steam blows will be conducted as part of Phase I of UGGPP.

BACKGROUND

In the AFC, the applicant has concluded that the noise impacts from project construction will be insignificant. It is assumed that this conclusion is based on projections of construction noise levels on workers and the community. However, in the noise section, no analysis was provided. Staff requests a detailed description on the construction noise analysis.

DATA REQUEST

41. Please provide a detailed calculation methodology and calculation data for the construction noise analysis. Please include the assumptions for any equipment sound level mitigation, including unmitigated and mitigated sound levels for all equipment assumed during construction.
42. Please provide a detailed analysis of the impacts of construction noise on the community.
43. Please provide a detailed analysis of the impacts of construction noise on workers.
44. Please provide a construction schedule that identifies a time frame from initial startup to completion of the project.

BACKGROUND

In the AFC, the applicant has concluded that the noise impacts from project operation will be insignificant. It appears that this conclusion is based on projections of operational noise levels from Phase II (570 MW) of the project.

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DATA REQUEST

45. Please revise the operational noise analysis to focus on the specifics of the Phase I project. Provide a description of how the noise levels were calculated. Please include the assumptions for the equipment sound level mitigation, including unmitigated and mitigated sound level data for all equipment included in the analysis.

BACKGROUND

In the AFC, the applicant has concluded that the cumulative noise impacts from the operation of the UGGPP facility will be insignificant.

DATA REQUEST

46. Please provide a discussion in the Noise Section of all types of other permitted or proposed projects that would create cumulative impacts. Please provide a detailed calculation methodology and calculation data for the cumulative impacts noise analysis.

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TECHNICAL AREA: Project Description
AUTHOR: Kevin Kennedy

BACKGROUND

In the AFC, the applicant states that Phase I of the United Golden Gate Power Project (UGGPP) "will operate exclusively under terms of a contract entered into with the Independent System Operator (ISO)," (AFC, p. 1-2). The AFC also states that "Phase I is designed to operate as a clean generating unit to address peaking power needs" (AFC p. 1-3). In discussing the air emissions, the applicant states that UGGPP will operate as a merchant power plant with dispatch governed by market conditions, and proposes limiting operation of the turbine to 24 hours/day and 4,000 hours/year (AFC p. 5.2-25).

DATA REQUEST

47. Please clarify the expected operating schedule of Phase I of UGGPP, and the basis for scheduling plant operations. As appropriate, use the current expected operation schedule in responding to the air quality data requests.

BACKGROUND

Table 3.8-1 of the AFC shows the start of construction for UGGPP Phase I as January 1, 2001. This project is being considered under the four-month expedited permitting process of §25552 of the Public Resources Code. Staff anticipates the Energy Commission's final certification decision in late February 2001. Under §25517 of the Public Resources Code, construction is not allowed to begin prior to the certification decision, except for limited activities as specified in Public Resources Code §25105.

DATA REQUEST

48. Please provide a revised construction schedule that will not require construction to begin prior to certification of the project by the Commission. To qualify for the expedited permitting process of §25552 of the Public Resources Code, the project must still be able to be in service before August 1, 2001. Please use this revised construction schedule in responding to the air quality and noise data requests.

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TECHNICAL AREA: Soil and Water Resources
AUTHOR: Joe O'Hagan

BACKGROUND

Figure 5.5-3 in the Supplemental Information filing on water resources indicates flow figures (including discharges) are inconsistent with or not identified at all in the AFC or the other supplementary information. Page S1-WR-1 states that the United Airlines Metal Removal Plant (MRP) discharge water will be used if it is determined that this non-potable water will not result in potential misuse. If this non-potable water source is not used, then SFIA water will be used. Furthermore, the method of wastewater discharge is unclear and some wastewater streams, such as combustive turbine washwater have not been identified.

DATA REQUEST

49. Please provide a water balance diagram showing all average and peak flows throughout the power plant, the source of these flows and all wastewater discharge streams and their ultimate destination. If a decision regarding the use of MRP water has not been made, please provide a water balance diagram for each of the potential sources.
50. Please explain the criteria for determining whether MRP water is usable at the proposed facility. If the criteria are based upon water quality and associated treatment costs, please provide specific information on these factors.
51. Please identify other potential sources of water for the proposed facility, including the United Cogeneration, Inc. facility.
52. Please identify wastewater streams other than sanitary waste that will be discharged to the sewer system. If wastewater streams other than sanitary sewage are discharged to the sewer system, will an industrial pre-treatment permit be required? If so, please identify the applicable wastewater limitations. Identify the volume and quality of the different washwater streams that will be generated and these streams will be disposed of.

BACKGROUND

Construction and operation of the proposed project may degrade water quality through erosion and sedimentation and contaminated stormwater runoff.

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53. Please provide a draft erosion and sediment control plan for construction of the proposed project. This plan should include a plot plan and text describing all best management practices to minimize erosion and sedimentation. The plan should include measures to address stormwater runoff and dewatering activities.

54. Please provide a draft Stormwater Pollution Prevention Plan for the operational phase of the proposed project. This draft plan should include a plot plan and text describing all best management practices to control the discharge of contaminated stormwater off-site. Areas where runoff and water from plant drains may that will be routed through the oil/water separator should be identified.

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TECHNICAL AREA: Transmission System Engineering
AUTHOR: Mark Hesters

BACKGROUND

Staff needs to completely identify downstream transmission facilities required by the interconnection of a new project. In order to determine whether or not downstream facilities are needed, staff requires a completed Preliminary Facility Study that identifies electric system impacts of the project and discusses mitigation measures considered and those proposed to maintain conformance with National Energy Regulatory Commission (NERC), Western Systems Coordinating Council (WSCC) and California Independent System Operator (Cal-ISO) reliability or planning criteria. Any significant electric facilities identified by this study will require a full environmental analysis.

DATA REQUEST

55. Please provide: a complete interconnection study or indicate when one will be available. This study should demonstrate conformance with NERC, WSCC and Cal-ISO reliability or planning criteria based on load flow, post transient, transient and fault current studies. Where mitigation is required to ensure compliance with the previously mentioned criteria, provide the alternatives considered and the reasons for choosing a preferred alternative.

BACKGROUND

The AFC included a one-line diagram of the United Golden Gate Power Project switchyard but did not provide diagrams of the new power plant's interconnection with the existing electrical network.

DATA REQUEST

56. Please provide one-line diagrams of the United Cogeneration Incorporated (UCI) switchyard with and without the UGGPP interconnection. Also provide a one-line diagram that shows the interconnection of the UCI switchyard to the rest of the electric network.

BACKGROUND

The AFC did not include a description of the circuits that will be used to connect the UGGPP to the UCI switchyard.

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57. Please provide a description of the type of circuit that will be used to connect the UGGPP to the UCI switchyard. Please include the number of circuits, phases per circuit, and the type and rating of the conductor.

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Technical Area: Visual Resources
Author: Eric Knight

BACKGROUND

Appendix B(g)(6)(A)(i) of the Siting Regulations require that the AFC provide a topographic map (1:24,000 scale) identifying the areas from which the project may be seen. These areas include but are not limited to the location of the Key Observation Points. The map provided (Map 5.13-1) does not depict all of the areas from which the project may be seen. In addition, the map does not show the location of the project site.

DATA REQUEST

58. Please revise Map 5.13-1 to depict all areas from which the project may be seen. This can be shown by color shading or drawing polygons around the areas from which the project may be seen.
59. Please revise Map 5.13-1 to show the location of the project site.

BACKGROUND

The AFC provides photosimulations of the proposed power plant. Staff needs information to determine the accuracy of the simulations provided. The AFC is not consistent in describing the height of the existing structures adjacent to the site. On page 5.13-9, the AFC states that the adjacent warehouse building is 140 feet tall. On page 5.13-10, the AFC states that the United Airlines hangar is 100 feet tall. The cover letter to the Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration (provided in the Land Use section of the AFC) states that the adjacent United Airlines Maintenance Operation Center building is approximately 200 feet in height. If the height of the adjacent United Airlines building is 100 or even 140 feet tall, the photosimulation of the project from KOP 1 does not appear to accurately depict the size of the proposed project, particularly the 140-foot tall stack. Staff needs additional information to determine the accuracy of the simulation from this KOP. The existing view photograph from KOP 1 should be revised to provide more context to the site by including the entire United Airlines hangar and the existing United Cogeneration Inc. (UCI) facility within the view.

DATA REQUEST

60. Please provide information demonstrating that the simulated size of the power plant is accurate. Include a description of the simulation technology used and the means that an independent analyst can use to verify the accuracy of the simulations.

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61. Please provide the dimensions (height, length, and width) of the major buildings of the five United Airlines Maintenance Operation Center complex. Please specify on the aerial photo provided in AFC Figure 3.3-1 the dimensions of these five building.
62. Please provide the dimensions of the major visible components fo the UCI facility adjacent to the site.
63. Please provide the heights of the existing light poles at the proposed site.
64. Please provide an 11" x 17" map (at a scale of 1" = 50') showing the location of the existing light poles, the proposed project features, the UCI facility, the United Airlines hangar (at least the northeast corner), and the location of KOP 1.
65. Please revise the existing view photograph from KOP 1 so that the entire United Airlines hangar and the UCI facility appear in the view. Please provide 4 sets of 11" x 17" high-resolution color photocopies of a photograph at life-size scale of the existing view toward the project site from KOP 1.
66. Please provide a more realistic photosimulation of the proposed project. Please provide 4 sets of 11" x 17" high-resolution photocopies of a visual simulation at life-size scale of the proposed project from KOP 1.

BACKGROUND

KOP 4 is located in Sign Hill Park. The AFC does not provide an estimate of the number of people who use the park.

DATA REQUEST

67. Please provide an estimate of the number of people who use Sign Hill Park on an annual basis.

BACKGROUND

The closest residential area with unscreened views of the proposed site is the area approximately one-half mile southeast of Sign Hill Park (the location of KOP 4). This residential area appears to provide a less screened view of the project than the selected KOP. A new KOP should be established to evaluate project impacts from this residential area.

DATA REQUEST

68. Please provide 4 sets of 11" x 17" high-resolution color photocopies of a photograph at life-size scale of the existing view toward the project site from a location within the residential neighborhood southeast of Sign Hill Park. The location for the new KOP should be as close to the power plant site as possible with an unobstructed view of the site.

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69. Please provide 4 sets of 11" x 17" high-resolution photocopies of a visual simulation at life-size scale of the proposed project from this location.
70. Please revise Figure 5.13-1 to show the location and angle of view of the new Key Observation Point.
71. Please provide a description of the visual setting at this KOP and an analysis of the visual impacts of the proposed project from this location.

BACKGROUND

KOP 1 is located near the bicycle and pedestrian path that runs around Bel Air Island (site of the SAMTRANS bus facility) located north of the project site.

DATA REQUEST

72. Please provide an estimate of the total number of people using the recreational trail on a daily and yearly basis.

BACKGROUND

AFC Figure 5.9-2 in the Land Use section depicts a recreational trail running parallel to North Access Road, passed the power plant site, and around the San Francisco International Airport Sewage Treatment Facility.

DATA REQUEST

73. Please clarify whether this is an existing or planned trail.
74. If it is an existing trail, please provide the approximate number of users on a daily and annual basis.
75. If it is a planned trail, please specify the planning document that describes the trail, any scenic resources policies related to the trail, and provide a discussion of the project's conformance with these policies.
76. Please also provide information on the status of any plans to implement the trail and the expected number of users.

BACKGROUND

A high-technology campus is located close to the location of KOP 2. The reproductions of photographs of views of the project site from this KOP included in the AFC do not allow a clear evaluation of the impacts from this location.

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DATA REQUEST

77. Please provide 4 sets of 11" x 17" high-resolution color photocopies of a photograph at life-size scale of the existing view toward the proposed site from KOP 2. These photocopies can be based on the existing photograph if the photo is at life-size scale and provides adequate resolution at 11" x 17".
78. Please provide 4 sets of 11" x 17" high-resolution color photocopies of a visual simulation at life-size scale of the proposed project from KOP 2. These photocopies can be based on the existing photograph if the photo is at life-size scale and provides adequate resolution at 11" x 17".

BACKGROUND

The AFC only provides the dimensions and material of the proposed 140-foot tall, 12-foot diameter steel stack.

DATA REQUEST

79. Please provide the dimensions (length, width and height) and material of each major visible component of the project, including the combustion turbine generator, SCR system, gas compressor and control module structures, and electrical switchyard.

BACKGROUND

In the assessment of visual impacts from KOP 3, the AFC states (page 5.13-10) that project lights will be hidden from view except those lights required by the Federal Aviation Administration (FAA) on the stack.

DATA REQUEST

80. Please explain why the stacks may be lit, despite the fact that the FAA Determination of No Hazard to Air Navigation (provided in the Land Use section of the AFC) states that marking and lighting are not necessary for aviation safety.

BACKGROUND

The AFC states that the project combined with other construction projects will not have a cumulative impact on visual resources of the area because the project is located within an established industrial area (page 5.13-12).

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DATA REQUEST

81. Please provide a description of the other current and future construction projects in the area, including their location and timing of construction.

BACKGROUND

The AFC states (page 5.13-12) that the project will adhere to the requirements of the Area East of 101 Plan of the South San Francisco General Plan.

DATA REQUEST

82. Please provide all relevant goals, policies, and standards related to visual resources from the Area East of 101 Plan.
83. Please provide a discussion on the project's conformance with all relevant goals, policies, and standards related to visual resources contained in the Area East of 101 Plan.

BACKGROUND

The AFC states (page 5.13-12) that the project, as a tenant of the San Francisco Airport, will adhere to design elements specified in the Tenant Improvement Guide.

DATA REQUEST

84. Please provide the design elements specified in the San Francisco Airport Tenant Improvement Guide.
85. Please provide a discussion on the project's conformance with the design elements in the Tenant Improvement Guide.

BACKGROUND

The AFC states (page 5.13-11) that the applicant will consult with the Bay Conservation and Development Commission (BCDC) to ensure compliance with BCDC project-specific requirements.

DATA REQUEST

86. If the consultation with BCDC has occurred, please provide a copy of the meeting notes and the name and phone number of a BCDC contact person who participated in the meeting.

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87. If the consultation with BCDC has not taken place, please provide a schedule for when the applicant intends to meet with BCDC.
88. Please provide the BCDC requirements relevant to the proposed project, and provide a discussion on the project's conformance with these requirements.

BACKGROUND

Proposed condition of certification VIS-4 states that the project owner will comply with the San Francisco International Airport (SFIA) signage regulations and with all city of South San Francisco Zoning Regulations relevant to signage.

DATA REQUEST

89. Please provide the SFIA regulations and South San Francisco zoning regulations related to signage.
90. Please provide a discussion on the project's conformance with the applicable signage requirements.