

CALIFORNIA ENERGY COMMISSION1516 NINTH STREET
SACRAMENTO, CA 95814-5512

February 16, 2001

Ed Blackford
AES Huntington Beach
21730 Newland Street
Huntington Beach, CA. 92646

Dear Mr. Blackford:

**AES HUNTINGTON BEACH GENERATING STATION RETOOL PROJECT
(00-AFC-13) DATA REQUESTS**

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission (Energy Commission) staffs requests that the AES Huntington Beach, LLC supply the information specified in the enclosed data requests.

The subject areas addressed in these data requests are air quality, biology resources, cultural resources, geology and paleontological resources, hazardous material, land use, noise, socioeconomics, traffic and transportation, and visual impacts. Other data requests may be submitted at a later date. The information requested is necessary to: 1) understand the project, 2) assess whether the project will result in significant environmental effects, and 3) assess project alternatives and mitigation measures.

Written responses to the enclosed data requests are due to the Energy Commission by February 19, 2001 or at such later date as may be agreed upon by the Energy Commission staff and the applicant.

If you are unable to provide the information requested in the data requests or object to providing it, you must contact the project manager within 5 days of receiving these requests stating your reason for delay or objections.

If you have any questions regarding the enclosed data requests, please call me at (916) 653-0062.

Sincerely,

Jack W. Caswell
Siting Project Manager

Enclosure

cc: Proof of Service 00-AFC-13
Agency Distribution List

**DRAFT Huntington Beach Generating Station Retool Project
Data Requests
(00-AFC-13)**

Technical Area: Air Quality

Author: Gabriel D. Behymer

BACKGROUND

The applicant's modeling analysis assumes the emissions from Units 1 & 2 to be included in the background, and thus does not include them directly. However, staff believes that modeling of the combined maximum emissions of the four boilers (i.e. both stacks) is necessary to complete an analysis of the projects possible impacts.

DATA REQUEST

1. Please provide stack emissions parameters, stack height, stack diameter, exhaust temperature, volumetric flow rate, exhaust gas velocity and criteria pollutant NO_x, SO₂, PM₁₀, CO emission rates and "UTM" coordinates for Units 1 & 2 sufficient to allow ISCST3 modeling.

BACKGROUND

The construction emissions modeling indicates the project may cause violations of both the 1-hour NO_x standard and the 1-hour SO₂ standard during project construction. Through other recent siting cases, staff has been made aware of emission reduction measures that were not considered by the applicant that could significantly reduce the emissions from the construction equipment. These measures range from simple engine modifications to oxidizing soot filters.

DATA REQUEST

2. Please evaluate and comment on the technical and economic feasibility of the following construction equipment emissions reduction methods and technologies. Please reference the source of all information reported.
 - Retarding engine timing on construction equipment (2 to 4 degrees),
 - Using construction equipment with pre-combustion chamber engines,
 - Using diesel fuel construction equipment with high pressure injectors,
 - Installing catalytic converters on all gasoline powered construction equipment,
 - Replacement of diesel generators with electric driven motors via existing power transmission corridors where possible,
 - Installing oxidation catalysts on all diesel powered construction equipment,
 - Installing oxidizing soot filters on all applicable diesel powered construction equipment,
 - Installation of ceramic engine coatings to all applicable diesel powered construction equipment,

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- Using alternative, low-emission fuels (e.g., CNG or EC1) and/or fuel additives (e.g., PuriNOx) for all construction equipment, and
- 3. Please provide a more refined construction modeling analysis using ISCST3 and local meteorological data approved by the south coast Air Quality Management District in order to more accurately predict the construction air quality impacts. Please provide electronic copies of all modeling input and output files.
- 4. Please specify if the PM10 emissions from the lay down area are included in the construction fugitive dust emissions estimates. If not, please include them in the calculated PM10 emissions from construction activities and rerun the modeling.

BACKGROUND

The applicant did not include information in the AFC regarding the contribution of ammonia slip to the formation of secondary PM10. Ammonia slip can contribute to the formation of secondary PM10 by reacting with NOx and SOx to form nitrates and sulfates.

DATA REQUEST

- 5. Please evaluate the contribution of ammonia slip emissions from the proposed power plant on the formation of secondary PM10.

BACKGROUND

The applicant has estimated the startup emissions of NOx from Units 3 & 4 to be 37.5 lbs/hr during a six-hour startup event (Table 5.2-12). It has been the experience of the Energy Commission staff that applicants can state and model emission factors that they do not wish to be limited to in the conditions of certification. In addition, the applicant's AFC does not contain estimates of the startup emissions of either CO or VOC.

DATA REQUEST

- 6. Does the applicant agree to have the emission estimate stated in Table 5.2-12 in lbs/hour as a permitted emission limit during startup procedures?
- 7. Please provide estimates of the startup emissions of CO and VOC from Units 3 & 4 in both lbs/hr and ppm.

BACKGROUND

In order to estimate the emissions impact from a project, it is necessary to prepare a Cumulative Modeling Analysis. This analysis determines whether the impacts from the project's typical emissions in combination with other stationary emissions sources within a six-mile radius of the proposed site will cause or contribute to a violation of an ambient air quality standard.

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DATA REQUEST

8. Please prepare a detailed Cumulative Modeling Analysis assessing whether the impacts of all inert criteria pollutants (NO_x, SO₂, CO, and PM₁₀) from the project's most typical operating mode in combination with all stationary emissions sources within a six-mile radius of the proposed site that have received construction permits, but are not yet operational, and all stationary emissions sources that are currently undergoing air district permit application review will cause or contribute to a violation of any ambient air quality standard (if no such sources are identified within a six mile radius, then detailed proof of this must be submitted)

BACKGROUND

On February 2, 2001 URS submitted supplemental information including Appendix C7, the Commissioning Plan. Appendix C7 includes five tables of estimated pollutant emissions during the commissioning phase of the project. Staff needs sufficient information to technically verify the applicant's emissions estimates and calculations as part of the air quality analysis of this project.

DATA REQUEST

9. Please provide verifiable data from the burner vendor and/or other sources sufficient to substantiate the data provided in Appendix C7 Table.

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Technical Area: Biological Resources

Author: Noel Davis

BACKGROUND

In order to reasonably predict the aquatic impacts of the AES Huntington Beach Generating Station Retool Project, information on biological resources that may be affected by the intake and thermal discharge is needed. In its Application for Certification and Data Adequacy Response Document, the applicant has provided information on adult fishes and epibenthic macroinvertebrates in the vicinity of the Huntington Beach Generating Station. The applicant has also provided information on regional nearshore zooplankton. However, information has not been provided documenting sandy beach organisms that may be affected by the discharge plume, or infaunal invertebrates in the vicinity of the intake and outfall.

DATA REQUESTS

10. The Application for Certification provided information on epifaunal invertebrates i.e. invertebrates that live on the surface of the sediment. Please provide data on infaunal invertebrates i.e. organisms that live within the sediments in the vicinity of the Huntington Beach Generating Station intake.
11. Please provide information on sandy beach organisms that live in the area affected by the thermal plume from the outfall.
12. Please provide copies of the biological studies from which the information in the Application for Certification was derived of fishes and epibenthic invertebrates in the vicinity of the Huntington Beach Generating Station.

BACKGROUND

In the Data Adequacy Response Document, the applicant provided an assessment of the biological impacts due to entrainment and impingement using an impact assessment model. However, a number of key assumptions of the model are not explained in the Data Adequacy Response Document. In addition, CEC staff is concerned that the analysis is based on studies done 20 years ago in the vicinity of power plants other than the Huntington Beach Generating station.

DATA REQUESTS

13. Please provide a copy of the referenced document (SCE 1983) that fully explains the assumptions of the entrainment and impingement model.
14. Please provide a copy of the thermal effects study.
15. This issue cannot be satisfactorily addressed in the short timeframe provided in the CEC licensing period. At least 12 months of marine sampling data or equivalent will be necessary before evaluation of impacts and any appropriate mitigation can be identified. This matter should be addressed during the normal course of NPDES permit review. To assure satisfactory progress is made to address this matter, the

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applicant will be required to develop and initiate, with the cooperation of appropriate agencies, a marine monitoring program. This program will be of adequate scope to address requirements of Clean Water Act Sections 316 (a) and (b), and any other related biological issues associated with plant operations. If the applicant believes updated entrainment studies are not warranted, please provide sound scientific justification that the earlier studies are still relevant to address current and future impacts of the generating station on marine resources.

16. Please provide a copy of the data submitted to the Regional Water Quality Control Board to support the current NPDES permit.

BACKGROUND

A large nesting colony of the state and federal endangered California least tern is located a little over a mile downcoast from the Huntington Beach Generating Station. Successful reproduction of least terns is heavily dependent on the presence of an adequate supply of food near the nesting colony. Least terns from the Huntington Beach colony forage on small fishes primarily in the nearshore ocean waters in the vicinity of the colony. If the Huntington Beach Generating Station Retool Project affects the abundance or distribution of small fishes in coastal water, it could potentially impact the Huntington Beach least tern colony.

DATA REQUEST

17. Please address the potential impact of the Huntington Beach Generating Station Retool Project on the Huntington Beach colony of the California least tern.
18. Please describe the strategy the applicant intends to follow to coordinate with the United States Fish and Wildlife Service and the California Department of Fish and Game to address the concerns of those agencies regarding impacts to this state and federal listed species.

BACKGROUND

The federal threatened western snowy plover has been observed to nest within the California least tern nesting colony near the Huntington Beach Generating Station. Snowy plovers forage on sandy beach organisms. If the thermal plume from the Huntington Beach Generating Station affects the distribution and abundance of sandy beach organisms it could affect nesting snowy plovers.

DATA REQUEST

19. Please address the potential impact of the Huntington Beach Generating Station Retool Project on the western snowy plover.
20. Please describe the strategy the applicant intends to follow to coordinate with the United States Fish and Wildlife Service to address the concerns of this agency regarding potential impacts to the western snowy plover.

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BACKGROUND

The applicant has stated that although alternative methods have been tried to control fouling of the cooling water system these methods have not been successful and that the plan is to return to heat treatments to control marine growth. CEC staff is concerned that heat treatment may have a greater impact on biological resources than alternative methods to remove fouling organisms.

DATA REQUESTS

21. Please provide justification that heat treatment is the least environmentally damaging practical alternative for the control of fouling organisms in the cooling water system.

BACKGROUND

Table 5.5-20 in the Application for Certification provides information on fish impingement on the intake of the Huntington Beach Generating Station cooling water system. However, it is difficult to interpret this table because no information is provided on the operations of the plant when the data were collected.

DATA REQUESTS

22. Please provide a new version of Table 5.5-20 with information about the operations of the plant during each year and the number of heat treatments.
23. Please provide data and analysis on total plant impingement for each year that data are available and separate out what impingement is related to heat treatment and what is related to normal operations.

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Technical Area: Cultural Resources

Author: Dorothy Torres

BACKGROUND

Staff needs additional information regarding ground disturbance to complete their analysis.

DATA REQUEST

24. Please provide a description (include depth in feet or inches) of the level of fill used for the existing plant.
25. Measuring from the current ground surface, how thick is the foundation that is scheduled for removal?
26. What will be the depth (in feet or inches) of planned excavations?
27. Will the depth of any excavations exceed the depth of the fill?
28. How will it be determined the level of fill has been exceeded?

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Technical Area: Geology and Paleontology

Author: Robert Anderson

BACKGROUND

Geology The AFC does not state what the peak horizontal ground acceleration for the project is expected to be or a method that would be used to determine the acceleration. The 1997 Uniform Building Code (UBC) and the 1998 California Building Code (CBC) contain requirements regarding the establishment of seismic parameters (Chapter 16, sections 1626 through 1629 [inclusive], section 1631[inclusive]). Table 5.3-1 of the AFC lists the maximum probable and maximum credible earthquakes for several nearby faults. It should be noted that both the maximum probable and maximum credible earthquakes have been dropped from consideration under the 1997 Uniform Building Code and the 1998 California Building Code.

DATA REQUEST

29. Please define the peak horizontal ground acceleration for the project and describe the method used in determining the peak horizontal ground acceleration. The method for determining the peak horizontal ground acceleration should be probabilistically based.

BACKGROUND

The Seismic Safety Element (dated 1974) mentioned in the AFC predates several fault studies that have helped establish the recency of faulting on the Newport Inglewood fault zone. The City of Huntington Beach has noted that an Alquist-Priolo Special Studies Zone has been established for a fault believed to cross through the project site.

DATA REQUEST

30. Please provide a detailed (1" equals 1,000 feet scale) geologic map of the proposed retooling project site and related linear facilities. The map should highlight the limits of the Alquist-Priolo Special Studies Zone and the location of fault traces (with labels) within one mile of the Huntington Beach Generating Station and 1,000 feet of related linear facilities.

BACKGROUND

A portion of the site is shown in AFC figure 5.3-7 to occur in a flood zone.

DATA REQUEST

31. Please provide a current copy of a Federal Emergency Management Agency, Flood Insurance Rate map or City of Huntington Beach Flood Control District or the Orange County flood zone map for the project.

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BACKGROUND

On page 5.3-6 of the AFC the applicant mentions a study by the City of Huntington Beach and the U.S. Army Corps of Engineers that is not listed in the references section of the section 5.3 of the AFC. There is nothing provided in the AFC that indicates that the potential for tsunami run up at the site may be similar to what was mentioned for the Bolsa Chica project.

Data Request

32. Please provide an excerpt from the study by the City of Huntington Beach and the U.S. Army Corps of Engineers that indicates what the 100-year and 500-year tsunami run up at the site may be and if the run up accounted for high-tide and storm surge conditions. Please include the full reference for the City of Huntington Beach and the U.S. Army Corps of Engineers study.

BACKGROUND

Paleontological Resources The Paleontological Resources Technical Report has not been provided to the CEC.

DATA REQUEST

33. Please provide the project Paleontological Technical Report.

BACKGROUND

The draft paleontological sensitivity map for the project does not identify what the four crossed circle designators represent. In addition the map does not state if there are or are not any known paleontological resources in the mapped vicinity of the project.

DATA REQUEST

34. Please clarify what these designators are for and either identify the locations of known paleontological resources or state on the map that there are no known paleontological resources within the area shown on the map entitled "Huntington Beach Power Redevelopment Project Paleontological Sensitivity Map Geologic Units/Paleontological Sites".

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Technical Area: Hazardous Materials Management

Author: Ramesh Sundareswaran

Technical lead: Rick Tyler

BACKGROUND:

Section 5.15.2.2 of the AFC provides a list of hazardous materials to be stored and used onsite for plant operations. The list however lacks pertinent details.

DATA REQUEST:

35. Please provide a revised list with the following: the chemical's trade name, chemical name, chemical abstract number, maximum quantity onsite in pounds and any hazardous characteristics.

BACKGROUND:

Section 3.4.10.2 of the AFC describes an onsite urea to ammonia generation system. The description lacks detail and does not indicate the maximum amount of ammonia that would be generated at any one time to meet project needs.

DATA REQUEST

36. Please identify the maximum amount of ammonia that would be generated and provide details about the onsite urea system including any safety features.

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Technical Area: Land Use

Author: Tom Buford and Dave Flores

BACKGROUND

The AFC does not identify the land division procedure (e.g., parcel map, lot line adjustment) that was used to create the parcel now owned by AES Huntington Beach, LLC, and which serves as the project site. This parcel was previously part of a larger parcel owned by Southern California Edison, the remaining portion of which is occupied by SCE, containing a switchyard (see AFC, Figure 3.2.1).

The State Subdivision Map Act (California Government Code Sections 66410-66499) establishes requirements and procedures for creation of individual parcels for the purpose of sale, lease, or financing.

DATA REQUEST

37. Identify the land division procedure used to divide the former SCE power plant property, and to create the parcel identified as the project site, consisting of approximately 12 acres. Identify the agency approving such land division, and provide information documenting that the land division complied with the State Subdivision Map Act.
38. Has the applicant obtained a Certificate of Compliance from any agency regarding the project site? If so, submit a copy of the Certificate with the response to this data request.

BACKGROUND

The AFC indicates that the State of California is a government jurisdiction within one mile of the project site (AFC, page 5.9-2). Figure 5.9-3, however, which identifies jurisdiction boundaries, does not identify state lands.

DATA REQUEST

39. Identify lands owned by or under the jurisdiction of the State of California, and located within one mile of the project site.
40. Identify the state agency responsible for the operation or maintenance of any state lands identified in the response to Data Request #3.

BACKGROUND

In its discussion of applicable laws, ordinances, regulations and standards (LORS), the AFC discusses the General Plan, Zoning Ordinance, and Coastal Zone Element of the City of Huntington Beach in general terms. The AFC does not, however, contain references to specific provisions of such documents, nor does it indicate the manner in which the project complies with such requirements, so that staff can determine such compliance. Staff for the

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City of Huntington Beach have indicated that the plant site may be an existing, non-conforming use.

The AFC identifies a Zoning Approval in Section 5.9.6 as the only land use permit or approval that would be required. The AFC does not identify the City's Urban Design Guidelines and Building Code as requiring compliance or approval.

The Warren-Alquist Act (Public Resources Code sections 25500 et seq.) provides that the Energy Commission shall require, as a condition of certification of any facility proposed in the coastal zone, that an area be established for public use (Section 25529).

DATA REQUEST

41. Identify each provision of the City of Huntington Beach General Plan, Zoning Ordinance, and Urban Design Guidelines that would apply to the project, and the manner in which the project would comply with each such provision. Compliance with landscaping and screening requirements should be demonstrated through preparation and submittal of a landscape and screening plan, to include the following:
 - a. Areas that will be landscaped;
 - b. Computation of the percentage of the project site that would be landscaped;
 - c. Computation of the percentage of the interior of any parking lot or area that would be landscaped;
 - d. Identification of plant species to be planted;
 - e. Location and type of irrigation proposed.
42. Identify the manner in which the applicant intends to comply with the public use requirements in Section 25529 of the Warren-Alquist Act, referenced in the Background discussion, above.
43. Identify any permits or approvals that have previously been issued for operation of power generating facilities on the project site, or the adjoining SCE site. Include the name of the issuing agency, date of approval, and file number.

BACKGROUND

The Zoning Ordinance for the City of Huntington Beach restricts the height of structures in the IG-0-CZ-FP2 zone to forty feet. The existing facility exceeds this height limitation. The Zoning Ordinance contains provisions regarding non-conforming structures, and the procedures and approvals required for alteration of such structures.

DATA REQUEST

44. Indicate whether the existing structure is non-conforming under the Zoning Ordinance of the City of Huntington Beach, with reference to specific provisions of the Zoning Ordinance, facts relating to the establishment and characteristics (e.g., height of

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structures) of the existing use, and whether the existing use is considered an approved non-conforming use.

45. If the existing structure is non-conforming, identify the specific provisions of the Zoning Ordinance that apply to the alteration or improvement of the site as proposed in the AFC, and any review or approvals that would be required pursuant to the Zoning Ordinance.

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Data Requests
(00-AFC-13)**

Technical Area: Noise

Author: Jim Buntin

BACKGROUND

CEC requires calculation of the Community Noise Equivalent Level (CNEL) from the data collected during the 25-hour noise measurement.

DATA REQUEST

46. Please calculate and present the CNEL value for the noise measurement data presented for nearest sensitive receptor (ML1). As additional information, please estimate the ambient CNEL values for sites ML 2, 3 and 4.

BACKGROUND

The CEC typically assesses compliance with the 5 dB noise level increase criterion by comparison of the steady state noise level due to the power plant to the average (or typical) L_{90} values obtained during nighttime hours, rather than to the L_{eq} values. This is of particular importance where the measured L_{eq} values are affected by traffic or other extraneous noise sources.

DATA REQUEST

47. Please re-evaluate compliance of the power plant noise with the 5 dB increase criterion, comparing the predicted power plant noise levels to the average or typical nighttime L_{90} values at each noise measurement site. Please revise Table 5.12-7 accordingly.

BACKGROUND

Some power plant construction projects include steam blows as a part of construction activities, which have the potential to cause annoyance at nearby residences due to very high noise levels.

DATA REQUEST

48. Please state whether steam blows will be undertaken as a part of the project construction.
49. If steam blows are planned, provide an estimate of noise levels expected at the nearest sensitive receivers, and an estimate of the impacts of those levels and what mitigation is feasible to reduce the noise.

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BACKGROUND

The existing power plant includes Unit 5, which is comprised of eight peaking gas turbine units. The operation of these units produces noise, which should be accounted for in the estimates of ambient and project-related noise levels.

DATA REQUEST

50. Please provide an estimate of the effects of operation of Unit 5 on ambient and project-related noise levels.

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Data Requests
(00-AFC-13)**

Technical Area: Soil and Water Resources

Author: Lorraine White

BACKGROUND

Construction and operation of the AES Huntington Beach Generating Station (HBGS) may induce water and wind erosion at the power plant site and around associated facilities. Staff understands that no grading will be performed as part of the construction activities associated with the “retooling” of Units 3 & 4, but other activities may result in impacts. Stormwater runoff may also contribute to erosion and sedimentation as well as transport pollutants off-site.

DATA REQUEST

51. Please provide a draft erosion control and stormwater management plan that identifies all measures that will be implemented during construction and operation of the proposed power plant.

The draft erosion control plan shall identify all permanent and temporary measures in written form and depicted on a construction drawing(s) of appropriate, legible scale. The plan should include information on the erosion control and stormwater management practices at the existing power plant and specify the changes necessary to existing practices to accommodate the new facility. The purpose of the draft plan is to minimize the area disturbed, to protect disturbed areas, to retain sediment on-site and to minimize off-site effects of stormwater runoff. The elements of the plan shall include any revegetation efforts and best management measures to control stormwater runoff during construction and operation. The plan should also identify maintenance and monitoring efforts for all erosion, stormwater runoff control and revegetation measures including measures to rectify unsuccessful revegetation efforts. If no such plan is to be developed, please submit a copy of the Storm Water Pollution Prevention Plan developed as part of the General NPDES Permit for Storm Water Discharge Associated with Construction Activities (SWRCB, 1999).

BACKGROUND

When average annual and peak water consumption figures are estimated, they generally result in an under and over estimation of a project’s water demand, respectively. This is because a facility does not continuously operate year round at average or peak conditions. According to the AFC, Units 3 and 4 were retired in 1995 and the air quality permits surrendered. Prior to being retired these units only operated sparingly (p.3.1-1). The circulating water system can provide the “retooled” Units 3 and 4 with 176,000 gpm of ocean cooling water during normal operations (p. 3.4-4). In the AFC the applicant stated Units 1 and 2 will serve intermediate loads and Unit 5 will primarily serve peaking loads (p. 3.1-1). The water usage rates (Table 5.5-21) indicates that 506.88 mgd of ocean water will be used on average and peak (a doubling of existing demand of 253.44); potable water demands on the City of Huntington Beach water supplies will be 0.195 to 0.39 mgd (Supplement revised page 3.4-7).

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DATA REQUEST

52. Please show the calculations used to derive the water usage rates discussed in section 5.4 and shown in Table 5.5-8 and 5.5-21 and Figure 5.5-5 (considering the discussion provided on the existing facility requirements on p. 3.4-7). Please note that the City of Huntington Beach, in their December 21, 2000 letter to the Commission, stated that more than 100 million gallons of potable water were consumed last year by the power plant.
53. Identify the likely number of days per year the HBGS will operate as base, peak (summer maximum conditions), and cyclic loads as well as be off-line for maintenance. Provide data that clearly shows what percent load each unit is expected to operate and specify the number of days each year this load profile is likely to occur.
54. Please provide information on monthly HBGS water demand for both ocean and potable water since 1990.

BACKGROUND

In their letter dated Dec. 21, 2000, the City of Huntington Beach indicated that the applicant needs to contract with the City for supply and reservoir studies required to verify or identify if any upgrades or modifications to the existing system are necessary to serve HBGS. According to the City, these studies are required because of changes to the system that supplies the potable water needs to the plant since Units 3 and 4 were retired in 1995.

DATA REQUEST

55. Please provide copies of the specified contract or agreement between the applicant and the City of Huntington Beach. Please indicate when these studies will be completed and what measures may be taken if it is found that upgrades or modifications are required.

BACKGROUND

The applicant proposes to discharge combined wastes to the Pacific Ocean. HBGS currently discharges waste to the Pacific Ocean under NPDES Permit # CA0001163, Santa Ana Region WQCB Order #00-5.

DATA REQUEST

56. Please provide staff with copies of the annual monitoring reports required under the HBGS NPDES permits since 1990 including data on historical waste discharge quantities and quality, intake and effluent flow, thermal, physical and chemical characteristics, characteristics of the receiving waters, and, if available, plume dispersion.

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BACKGROUND

In the AFC, the applicant stated that a Spill Prevention Control and Countermeasures Plan (SCE 1998, pg. 5.5-26) and General NPDES Permits for Storm Water Discharge Associated with Construction Activities (SWRCB, 1999) and Industrial Activities (SWRCB 1997) have been prepared for the HBGS.

DATA REQUEST

57. Please submit copies of these plans to staff and indicate if any changes or modifications to these plans will be required as part of the Units 3 & 4 retooling.

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Technical Area: Traffic and Transportation

Author: Mark R. Hamblin

BACKGROUND

Based on the statement made in the City's General Plan and on AFC page 5.11-2 it appears the ADT (average daily trips) of 30,000 should have been used in the statement on page 5.11-7 instead of the AADT (annual average daily trips) of 5,900. If this is correct, then Newland Street, which has a vehicle capacity [the ability of a roadway to carry traffic] of 10,000 and an ADT of 30,000, would have a LOS of less than "A". The ADT represents 20,000 vehicles higher than the capacity of Newland Street.

The Huntington Beach General Plan dated May 13, 1996 (Figure CE-1, pg. III-CE-3; Table CE-1, pg. III-CE-12) defines Newland Street as a four-lane "Primary Arterial Street Vehicle Capacity – 30,000 ADT (average daily trips).

AFC page 5.11-2 under Section 5.11.1.1.1 states that "Newland Street is a two-lane road with a vehicle capacity of 30,000 average daily trips (ADT).

Table 5.11-2 shows Newland St. having 5,900 annual average daily trips (AADT), a capacity of 10,000 and a Level of Service "A".

Page 5.11-7 states that "Newland St. has a capacity of 10,000 vehicles per day. Because existing average daily traffic on this private road is approximately 5,900, the road is able to accommodate project-related increases in traffic without reducing its LOS to a significantly adverse level (i.e., LOS E or F)."

DATA REQUEST

58. Clarify the ADT for Newland Street.
59. What is the LOS for Newland Street based on the ADT of 30,000 as shown in the City's General Plan and on AFC page 5.11-2?
60. Revised Table 5.11-1 and include the traffic characteristics for Newland Street.

BACKGROUND

The Huntington Beach General Plan dated May 13, 1996 (Figure CE-7, pg. III-CE-17) shows the portion of Newland Street between the Pacific Coast Highway and Atlanta Avenue as a designated "City Truck Route".

AFC page 5.11-4 –5 states "Although traffic counts specifically for trucks are not available for Newland Street, traffic in the project vicinity is generally characterized by a large ratio of cars to trucks due to the street's use primarily as a residential street." However, the next sentence presents a contradiction, it states "Based on field observations, it is assumed that 90 percent or more of the traffic along Newland St. is truck traffic."

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DATA REQUEST

61. Clarify the traffic counts (automobile and truck) for Newland Street.
62. What is the current percentage of truck traffic on Newland Street?
63. What is the current car to truck ratio for Newland Street?
64. What is the estimated traffic on Newland Street with the project under construction and during operation?

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Data Requests
(00-AFC-13)**

Technical Area: Transmission System Engineering

Author: Ajoy Guha, P. E.

Technical senior: Al McCuen

BACKGROUND:

Staff needs a complete Interconnection Study Report to analyze the system reliability impacts due to interconnection of the project, and to identify the downstream facilities necessary to support interconnection of the project. Project interconnection must comply with North American Electric Reliability Council (NERC) planning Standards, Western Systems Coordinating Council (WSCC) Reliability Criteria, and the California Independent System Operator (Cal-ISO) Reliability Criteria. While an operating interconnection study was provided in Appendix H of the January 19, 2001 supplemental filing, a criteria violation is shown and a choice of 'Congestion Management' has been made as a means of mitigation of all transmission criteria violations in the 2001 Light Spring case. The CEC staff needs more detailed information in order to assess the transmission impacts in both the 2001 Heavy Summer and Light Spring cases.

DATA REQUESTS:

Please provide the following data from the Participating Transmission Owner's (PTO) operating interconnection study for the project:

65. Load Flow Study:

- a. Load flow diagrams for base cases, 2001 heavy summer and light spring, without queue generation, with Huntington Beach (HB) units 3 & 4, and with queue generation and HB units 3 & 4.
- b. A list of all single and double contingencies with results performed on both 2001 heavy summer and light spring cases as stated above in item 1.a.

Tabulation of criteria violation cases, i.e. thermal overloading or voltage deviation limits exceeded, with mitigation options and corresponding load flow diagrams as an appendix is the preferred format.

66. Transient Stability Study:

A list of all critical transient stability cases for 2001 heavy summer with results for single and double contingencies as identified by the PTO.

Tabulation of results with outage type for tested cases with corresponding stability plots as an appendix is the preferred format.

67. Post-transient Voltage Stability Study:

A list of all critical post-transient voltage stability cases for 2001 heavy summer with results for single and double contingencies as identified by the PTO.

Tabulation of results with outage type for tested cases with corresponding extended stability plots as an appendix is the preferred format.

**DRAFT Huntington Beach Generating Station Retool Project
Data Requests
(00-AFC-13)**

Technical Area: Visual Resources

Author: William Kanemoto, Eric Knight, and William Walters

BACKGROUND

Staff needs clarifying information to determine the accuracy of the simulations of the SCR units. Simulations provided in the January 19th data adequacy submittal depict the SCR units as two large rectangles. Simulations provided in the February 5th data adequacy submittal depict the SCR units as two small rectangles. According to the AFC (revised page 5.13-12), the SCR units will be located 97 feet above the ground on steel columns.

DATA REQUEST

68. Please explain why the simulations are different from those in the January 19th data adequacy submittal.
69. In the new simulations, the SCR units appear to be floating in space. Please explain if the steel columns supporting the SCR units will be visible from any of the KOPs.
70. Please provide all dimensions (height, length, and width) of the proposed SCR units.
71. Please provide an engineering drawing of the SCR units or other evidence demonstrating that the simulations provided in the February 5th data adequacy submittal are accurate. If the simulations are not accurate, please revise the simulations.

BACKGROUND

The Local Coastal Program (LCP)/Coastal Element of the Huntington Beach General Plan identifies the HBGS as a visual 'weakness,' and also includes a number of goals and policies with the intent of improving and enhancing the visual appearance of the Coastal Zone in the project area. For example, as stated in Coastal Element Objective C.4.7, an objective of the Coastal Element/LCP is to "[i]mprove the appearance of visually degraded areas within the Coastal Zone." Policy C.4.7.8 requires "landscape and architectural buffers and screens around oil production facilities and other utilities visible from public rights-of-way."

DATA REQUEST

72. Please provide, on a scaled map, a conceptual plan for locating landscape and architectural buffers and screens around Units 3 and 4, particularly at, but not necessarily limited to, the site boundaries. Please include in the plan an indication of opportunity sites where visual buffers could potentially be established to provide screening of Units 3 and 4 as seen by sensitive visual receptors, including residents within the viewshed, motorists on PCH, and visitors at nearby portions of the Huntington Beach State Park.
73. Please provide a list of recommendations from a qualified arborist of viable vegetation options for potential landscaping at the project site, including large-scale tree species.

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BACKGROUND

The AFC states that the project is consistent with the industrial development standards specified in Chapter 212 of the Huntington Beach Zoning Ordinance but does not describe what the applicable standards are or provide a discussion for determining whether the project is in conformance or not.

DATA REQUEST

74. Please provide a discussion of the conformity of the project with all applicable development standards specified in the Zoning Ordinance related to visual resources, including those pertaining to structures, landscaping, lighting and signs. The discussion should be of sufficient detail to indicate measures the applicant intends to incorporate in the project to ensure such conformity.

BACKGROUND

The discussion of LORS in the Visual Resources section of the AFC does not contain a complete discussion of applicable policies of the Huntington Beach General Plan, including relevant policies of the Land Use, Urban Design, and Open Space Elements.

DATA REQUEST

75. Please provide further discussion of project conformity with all relevant portions of the Huntington Beach General Plan including policies of the Land Use, Urban Design, and Open Space Elements, Citywide Urban Design Guidelines, and any other policies, goals, or guidelines that may pertain to the visual effects of the HBGS.

BACKGROUND

A reliable and detailed analysis of both existing and potential future HBGS visible water vapor plumes is needed to adequately evaluate the visual effects of the proposed project. The visible water vapor plume discussion provided in the Visual Resources section of the AFC does not provide information regarding the frequency, duration and size characteristics of the exhaust stack water vapor plumes. Staff will conduct a plume modeling analysis to determine the exhaust stack plume frequency and size characteristics. Staff will require additional project and site data to complete this analysis.

DATA REQUEST

76. Please provide the following information regarding the existing operating Units 1 and 2 stack exhaust parameters and the proposed retooled Units 3 and 4 stack exhaust parameters.
 - a. Stack Exhaust Temperature;
 - b. Moisture Content (% by Weight);

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- c. Mass Flow, and;
- d. Average Molecular Weight.

The Applicant may provide these exhaust parameters, in tabular form, for the range of ambient conditions (i.e., ambient temperature and relative humidity) that can be reasonably expected to occur at the project site location; or if the Applicant desires they may provide a worst case exhaust condition that staff will model throughout the year.

77. Please provide hourly meteorological data files from a meteorological monitoring station located near the project site that includes, at a minimum, the following parameters:

- e. Year, Month, Day, Hour
- f. Ambient Temperature and Relative Humidity
- g. Wind Speed and Wind Direction (from Direction)
- h. Stability Class

A minimum of five sequential years should be provided. Additional meteorological parameters, such as fog or other visibility obscuring phenomena (i.e. rain, haze), should be provided if available. Please provide the meteorological data files in an ASCII space delimited, or spreadsheet, form for ease of use. Also, please provide the name and location (in UTM or other standard coordinate system) of the meteorological data station.

Staff currently has a five-year data set from a Long Beach monitoring station that can be used if the applicant considers Long Beach data to be representative of the site in Huntington Beach, or if no better data source is available. However this data set does not identify fog hours.