

Memorandum

Date: July 28, 2003

Telephone: (916) 651-8839

To : Robert Pernel Commissioner and Presiding Member
James D. Boyd, Commissioner and Associate Member

From : California Energy Commission - Jim Bartridge
1516 Ninth Street Energy Commission Project Manager
Sacramento, CA 95814-5512

Subject : **INLAND EMPIRE ENERGY CENTER PROJECT ERRATA TO THE SUPPLEMENTAL TESTIMONY AND ADDENDUM TO THE STAFF ASSESSMENT**

Attached please find staff's Errata to the Supplemental Testimony and Addendum to the Final Staff Assessment (FSA) for the Inland Empire Energy Center (IEEC) Project (01-AFC-17).

This filing represents corrections and additional changes to the Conditions of Certification presented in the Supplemental Testimony and Addendum to the FSA filed July 18, 2003. Where there are additional changes, shading accompanies the underlined new text and ~~strike out~~ text to be removed. In addition, above each correction or change, the page where the change occurs is noted. Only those portions of conditions where changes or corrections occur are presented in this filing; please consult the July 18 filing for the complete language of each affected condition. All changes noted in this document have been discussed with and are acceptable to the applicant.

Please call me at (916) 651-8839 if you have any questions.

Sincerely,

James A. Bartridge
Siting Project Manager

Attachment

cc: Docket 01-AFC-17
Proof of Service

**Inland Empire Energy Center (01-AFC-17)
Errata to FSA Supplemental Testimony and Addendum**

BIOLOGICAL RESOURCES

CONDITIONS OF CERTIFICATION

The following additional changes occur on page 41 of the Supplemental Testimony and Addendum to the Staff Assessment filed July 18, 2003.

BIO-3: The project owner's Construction Manager and Operation Manager shall act on the advice of the Designated Biologist or Biological Monitor(s) to ensure conformance with the biological resources conditions of certification. If required by the Designated Biologist or Biological Monitor(s), the project owner's Construction Manager or Operation manager shall halt all site mobilization, ground disturbance, grading, construction, and operation activities in areas specified by the Designated Biologist as sensitive or which may affect a sensitive area or sensitive species.

SOIL AND WATER RESOURCES

CONDITIONS OF CERTIFICATION

The following additional changes occur on page 67 of the Supplemental Testimony and Addendum to the Staff Assessment filed July 18, 2003.

SOIL & WATER 2: Prior to beginning site mobilization, the project owner shall submit a Notice of Intent for construction under the General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Construction Activity to the State Water Resources Control Board (SWRCB). The project owner shall develop and implement a Storm Water Pollution Prevention Plan (SWPPP) for the construction of the entire project. The SWPPP shall be submitted to ~~the United States Army Corps of Engineers (USACOE) for comments and consideration of jurisdiction under Section 404 of the Clean Water Act, to~~ Riverside County ~~and the RWQCB~~ for review and comment, and to the CPM for review and approval. The SWPPP will include final construction drainage design consistent with the criteria specified by County of Riverside and specify Best Management Practices (BMPs) for all on- and off-site IEEC project facilities. BMPs shall ~~also~~ control soil erosion from storm water drainage below the detention pond and from storm water discharge of the eastern boundary interception ditch ~~and protect the bed and bank drainage feature running adjacent to the southern IEEC boundary.~~ Conditions of Certification BIO-7 and BIO-8 address requirements for 401 Water Quality Certification from the Regional Water Quality Control Board and a Section 404 Permit from the Army Corps of Engineers.

Verification: No later than ~~60-180~~ days prior to the start of site mobilization for any project element, the SWPPP for Construction Activity and a copy of the Notice of Intent for construction under the General NPDES Permit for Discharges of Storm Water Associated with Construction Activity ~~shall be~~ filed with the SWRCB, shall be submitted to ~~the USACOE, County of Riverside Building and Safety Department, and the RWQCB~~ for comments and to the CPM for approval. Approval of the SWPPP must be received from the CPM prior to site mobilization.

The following additional changes occur on page 68 of the Supplemental Testimony and Addendum to the Staff Assessment filed July 18, 2003.

SOIL & WATER 3: Prior to ~~initiating~~ project commercial operation, the project owner shall submit a Notice of Intent for operation under the General NPDES Permit for Discharges of Storm Water Associated with Industrial Activity to the State Water Resources Control Board (SWRCB). The project owner shall develop and implement a Storm Water Pollution Prevention Plan (SWPPP) for the operation of the project. The SWPPP shall be submitted to ~~the USACOE for comments and consideration of jurisdiction under Section 404 of the Clean~~

~~Water Act, to~~ Riverside County ~~and the RWQCB~~ for review and comment, and to the CPM for review and approval. The SWPPP will include final operating drainage design consistent with the criteria specified by the County of Riverside and specify BMPs and monitoring requirements for the IEEC project facilities. BMPs shall ~~also~~ control soil erosion from drainage of storm water below the detention pond and from storm water discharge in the eastern boundary interception ditch ~~to protect the bed and bank drainage feature running adjacent to the IEEC southern boundary.~~ Conditions of Certification BIO-7 and BIO-8 address requirements for 401 Water Quality Certification from the Regional Water Quality Control Board and a Section 404 Permit from the Army Corps of Engineers.

The following additional changes occur on page 68 of the Supplemental Testimony and Addendum to the Staff Assessment filed July 18, 2003.

SOIL & WATER 4: The project owner shall use tertiary-treated water supplied from Eastern Municipal Water District's (EMWD's) Recycled Water System as its primary source of water for cooling, ~~and process~~ and landscape irrigation water supply. Based on EMWD's projected availability of recycled water supply to IEEC, it is recognized that EMWD may need to augment its recycled water system with raw fresh water during the early years of IEEC project operation. The project owner will obtain copies of project water-use records derived from EMWD's recycled water revenue meters. In addition, the project owner shall obtain copies of meter records or other appropriate records documenting methodology used by EMWD for billing purposes to quantify for EMWD's raw fresh water augmentation to its recycled water system at the Perris Water Treatment Plant for indirect supply to IEEC. The project owner shall prepare an annual summary, which will include the monthly range and monthly average of daily water usage in gallons per day, and total water used on a monthly and annual basis in acre-feet. The annual summary shall distinguish sources and uses of water according to recycled water supplied for IEEC cooling, ~~and process~~ and landscape irrigation purposes, ~~fresh water for IEEC potable supply,~~ and raw fresh water augmenting EMWD's recycled water system at the Perris Water Treatment Plant. For years subsequent to the initial year of IEEC operation, the annual summary will also include the yearly range and yearly average water use. Raw water shall not be used to supply these demands unless recycled water is temporarily unavailable.

VISUAL RESOURCES

CONDITIONS OF CERTIFICATION

The following additional changes occur on page 78 of the Supplemental Testimony and Addendum to the Staff Assessment filed July 18, 2003.

Landscape Screening

VIS-3 The project owner shall provide landscaping that is effective in screening the proposed project from views from I-215, State Route (SR)-74, Ethanac Road, Dawson Road, Almaden Lane, Spring Winds Drive, North Winds Drive, McLaughlin Road, Menifee **Road**, and nearby residences. Trees and other vegetation consisting of informal groupings of fast-growing evergreen trees species must be strategically placed and of sufficient density and height to effectively screen the majority of structural forms ~~within five years after first turbine roll~~ as soon as is reasonably practicable. The landscaping shall conform to the applicant's Revised Landscaping Plan submitted by the project owner on December 20, 2002 (Calpine 2002g, see also VISUAL RESOURCES Figure 17) except for the changes indicated by italics in the following list: (1) street trees shall be planted immediately west of the project site along Antelope Road, (2) two offset rows of taller *evergreen* screening trees shall be planted on the berm to be constructed on the west side of the project site bordering Antelope Road, one row on top of the berm and one row on the west slope of the berm; (3) evergreen shrubs shall also be planted on the western berm to provide screening beneath the tree branches; (4) Landscape plantings along the western half of the southern boundary shall be initiated within one year of the start of construction; (5) Landscape plantings ~~along the southern side of SR 74 shall be installed at the start of construction in order to further reduce the time to effective project screening when viewed from KOP 5 and SR 74;~~ If the Riverside County Economic Development Agency agrees to permit the project owner to incorporate planting along the southern side of SR 74 into its plans for beautification of the **Highway- SR 74** corridor, the plantings in this area shall be installed at the start of construction or as soon after the start of construction as the EDA permits; and (6) informal groupings of fast-growing broadleaf evergreen trees shall be placed along all sides of the ~~power plant and~~ compressor station sites. ~~VISUAL RESOURCES Figures 11C, 12C, 13C, 14C, 15C, and 16C illustrate a degree of project screening that is considered effective.~~

The project owner shall submit a landscaping plan to the CPM for review and approval. The plan shall include:

- a) 11"x17" color simulations of the proposed landscaping at five years as viewed from KOPs ~~1, 2, 4, and 5 and 6;~~

- b) a plan view to scale depicting the project and the location of the landscape screening;
- c) a detailed list of plants to be used, their size ~~and age at planting~~, the expected time to maturity, and the expected height at five years and at maturity; and a table showing when the screening objectives are calculated to be achieved for each of the major project structures, and the height and elevation of the features of the existing setting and the project that are factors in those calculations;
- d) A description of any irrigation needed to ensure the proper growth and health of the plantings.

~~The project owner shall not implement the plan until the project owner receives approval of the submittal from the CPM. However, t~~The planting must be completed by start of project commercial operation.

The following additional changes occur on page 83 of the Supplemental Testimony and Addendum to the Staff Assessment filed July 18, 2003.

Cooling Tower Plume Frequency

VIS-98 The project owner shall ensure that the IEEC cooling tower is designed and operated so that the plume frequency will not increase substantially from the design as certified.

Prior to ordering the cooling towers, the project owner shall provide to the CPM for review and approval the final design specifications of the cooling tower related to plume formation. The project owner shall not order the cooling tower until notified by the CPM that the following design requirements have been satisfied:

Either:

- a) The cooling tower design confirms that the exhaust air flow rate per heat rejection rate:
 - 1) will not be less than 29.834 kilograms per second per megawatt when operating without duct firing when ambient temperatures are between 32 degrees Fahrenheit and 100 degrees Fahrenheit; and
 - 2) will not be less than 18.42 24 kilograms per second per megawatt when operating with duct firing when ambient temperatures are between 32 degrees Fahrenheit and 100 degrees Fahrenheit; or
- b) If the cooling tower design exhaust air flow rates per heat rejection values are reduced from the levels shown in a) 1) or and 2) above, the cooling tower design confirms that the plume frequency will not exceed staff's

criteria for triggering a visual impact analysis (i.e., greater than 10% of the seasonal daylight clear hours, where “clear” is defined as all hours with total sky cover equal to or less than 10 percent plus half of the hours with total sky cover 20-100 percent that have a sky opacity equal to or less than 50 percent. the project owner shall provide revised exhaust flow, exhaust temperature, and heat rejection data to allow staff to remodel the cooling tower plume frequency.

GEOLOGY AND PALEONTOLOGY

CONDITIONS OF CERTIFICATION

The following additional changes occur on page 107 of the Supplemental Testimony and Addendum to the Staff Assessment filed July 18, 2003.

PAL-2 The project owner shall provide to the PRS and the CPM, for approval, maps and drawings showing the footprint of the power plant and all linear facilities. Maps shall identify all areas of the project where ground disturbance is anticipated. If the PRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the PRS and CPM. The site grading plan and the plan and profile drawings for the utility lines would normally be acceptable for this purpose. The plan drawings should show the location, depth, and extent of all ground disturbances and can be 1 inch = 40 feet to 1 inch = 100 feet range. If the footprint of the power plant or linear facility changes, the project owner shall provide maps and drawings reflecting these changes to the PRS and CPM.

If construction of the project will proceed in phases, maps and drawings may be submitted prior to the start of each phase. A letter identifying the proposed schedule of each project phase shall be provided to the PRS and CPM. Prior to work commencing on affected phases, the project owner shall notify the PRS and CPM of any construction phase scheduling changes.

At a minimum, the project owner shall ensure that the PRS consults weekly with the project superintendent or construction field manager to confirm area(s) to be worked during the next week, until ground disturbance is completed.

Verification: At least 30 days prior to the start of ground disturbance, the project owner shall provide the maps and drawings.

If there are changes to the footprint of the project, revised maps and drawings shall be provided at least 15 days prior to the start of ground disturbance.

If there are changes to the scheduling of the construction phases, the project owner shall submit a letter to the CPM within 5 days of identifying the changes.