

**MAGNOLIA POWER PROJECT
APPLICATION FOR CERTIFICATION
RESPONSE TO CEC DATA REQUESTS
01-AFC-06**

Technical Area: Facility Closure

Data Request 24 Rev: During the November 13, 2001 Data Requests Workshop CEC staff provided an example closure plan and requested the applicant provide a similar plan for MPP.

Response: Following is a Closure Plan based on the Example Plan provided by the CEC.

3.10.3 Closure Plans

Facility closure can be either temporary or permanent. Since Burbank Water and Power (BWP) will be the operator of MPP facilities and owner of the property upon which the facilities are installed, BWP will implement any closure plan. Two closure plans are described below and will be submitted for approval covering both unexpected and planned closures. An on-site contingency plan covering unexpected temporary or permanent closure will be submitted to the CEC Compliance Project Manager (CPM) no less than 60 days prior to commencement of commercial operation. A facility closure plan for planned permanent closure will be submitted for CEC approval at least 12 months prior to commencement of closure activities.

3.10.3.1 Unexpected Temporary or Permanent Closure

Temporary closure is defined as shutdown for a period exceeding the time required for normal maintenance, including overhaul or replacement of the gas or steam turbine. Causes for unexpected temporary closure could be a disruption in the natural gas supply, damage to the plant from earthquake, fire, storm, or other natural acts, or from owner decision to not operate the facility for a period of time due to economic or other reasons.

For a short term, unexpected closure where there is no facility damage and no release of a hazardous substance, the facility will be

**MAGNOLIA POWER PROJECT
APPLICATION FOR CERTIFICATION
RESPONSE TO CEC DATA REQUESTS
01-AFC-06**

maintained as is until the plant is restarted. Security of the facility will be maintained and responsible agencies, as required, will be notified. Depending on the length of shutdown, the contingency plan may be implemented. The contingency plan, if implemented, will be conducted to assure conformance with applicable LORS and protection of public health and safety, and the environment. The plan, depending on the expected duration of the shutdown, may include the draining of chemicals from storage tanks or other equipment, and the safe shutdown of all equipment. Wastes will be disposed of according to applicable LORS, as discussed in Section 5.14 Waste Management.

When the unexpected closure is caused by damage to the facility, and there is a release or threatened release of hazardous materials, procedures will be followed as set forth in the BWP Hazardous Materials Business Plan (HMBP) that will be revised as necessary to include materials used at MPP. Procedures to control releases, notify regulatory agencies, train plant personnel, etc. are included in the HMBP. Once the threat of the hazardous substance release is addressed, temporary closure will proceed as described above.

In the unlikely event of an unexpected permanent facility closure, SCPPA will notify the CPM, as well as other responsible agencies, by telephone, fax, e-mail, etc., within 24 hours of the determination and will take all necessary steps to implement the on-site contingency plan described above. SCPPA will keep the CPM informed of the status of all closure activities.

3.10.3.2 Planned Permanent Closure

The planned life of the MPP is 30 years. Operation beyond 30 years will depend upon the economic, environmental, and regulatory climate at that time. Similarly, advances in technology could compel a premature closure of the facility prior to the anticipated operating life. Whether the MPP is closed at the end of, prior to, or after 30 years a permanent closure plan will be developed to assure that it will be completed in a manner that protects the public health and safety

**MAGNOLIA POWER PROJECT
APPLICATION FOR CERTIFICATION
RESPONSE TO CEC DATA REQUESTS
01-AFC-06**

and is environmentally acceptable. A more detailed plan and/or schedule cannot be developed at this time as it is unclear what the requirements for closure will be 30 years from now. The plan will include the following:

- Proposed decommissioning activities and schedule for the power plant facilities;
- Identification of and conformance with applicable LORS in effect at the time of closure;
- An analysis of the closure alternatives considered and a discussion of the reasons for selecting the preferred Facility Closure Plan;
- Activities necessary to restore the site if the Facility Closure Plan requires the removal of all equipment; and
- Associated costs and source of funds for the proposed Facility Closure Plan activities.

The Facility Closure Plan for the power plant will attempt to maximize the recycling of facility components. In addition, attempts will be made to sell unused chemicals back to suppliers or other purchasers or users. Equipment containing chemicals will be drained, cleaned, and shut down to assure public health and safety and to protect the environment. Non-hazardous and hazardous wastes will be disposed of in accordance with applicable LORS. The site will be secured 24 hours per day during decommissioning activities.