

CALIFORNIA ENERGY COMMISSION1516 NINTH STREET
SACRAMENTO, CA 95814-5512

February 8, 2001

Mr. Andrew Trump
Western Region
Duke Energy North America
655 3rd Street, PMB 49
Oakland, CA 94607

Dear Mr. Trump:

MORRO BAY POWER PLANT (00-AFC-12) FIRST SET OF DATA REQUESTS

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

This first set of data requests (#1-185) addresses the areas of air quality, biological resources, cultural resources, efficiency, geology/paleontology, land use, noise, reliability, traffic and transportation, socioeconomics, soil and water resources, transmission system engineering, visual resources, and waste management. Written responses to the enclosed data requests are due to the Energy Commission staff on or before March 9, 2001, or at such later date as may be mutually agreed.

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

If you have any questions regarding the enclosed data requests, please call me at (916) 654-4176.

Sincerely,

Kae C. Lewis
Energy Facility Siting Project Manager

Enclosure

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

cc: Proof of Service (00-AFC-12)
Ray Menebroker, ARB
Gary Willey, SLOAPCD
Peter Mackin, CAL-ISO
Dick Butler, National Marine Fisheries Service
Diane Steeks, US Fish and Wildlife Service
Matt Haber, U.S. EPA, Reg. IX
Henriette Groot, Coastal Alliance on Plant Expansion
Michael Thomas, Central Coast Regional Water Quality Control Board
David Schwartzbart, Central Coast Regional Water Quality Control Board
Deborah Johnson, California Department of Fish and Game
Greg Fuz, City of Morro Bay Public Services
Dan Chia, California Coastal Commission

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Air Quality
CEC Author: Magdy Badr

BACKGROUND

Appendix 6.2-8 of the AFC discusses the methodology and assumptions of the cumulative air quality impact from the Morro Bay Power Plant, which is forthcoming from the applicant. In analyzing the cumulative potential impacts, all major emitters within 6 miles or more from the proposed project should be identified.

DATA REQUEST

1. Please provide the dispersion modeling analyses of the cumulative air quality impacts of the proposed Morro Bay Power Plant using the protocol submitted in the AFC. The analysis should include all major emitters within a 6-mile radius as well as the proposed project.

BACKGROUND

There appears to be an inconsistency between the assumptions used to calculate the daily emissions and the quarterly emissions. Daily emission calculations are based on four hours of cold start-up for each of the proposed turbines, however, the quarterly offsets appear to be based on a different set of assumptions. A clarification of the relationship between the worst day emissions and the proposed offsets will be necessary for staff's analysis.

DATA REQUESTS

2. Please explain why the assumed cold start-up period for the frame 7FA is four hours.
3. Please explain how the worst daily emissions were used to calculate the quarterly emissions and required offsets for the proposed project.

BACKGROUND

The construction and demolition emission analysis presented in Appendix 6.2-5 is based on 299 workers per day. However, the project construction stage summary presented in Table 6.11-1, states that during stage II peak activities will last for 7 months in which the workforce needed will be 950 workers per day.

DATA REQUEST

4. Please indicate the correct number of workers and, as necessary, re-evaluate the construction emissions levels and impacts from the proposed project based on the information presented in Table 6.11-1 of the Application.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

On November 17, 2000, San Luis Obispo Air Quality Management District submitted the following concerns about the proposed project.

DATA REQUESTS

Please, respond to these concerns as part of the CEC data request. (See Attachment B)

Attachment B

November 16, 2000 Letter to CEC (00-AFC-12) - CEQA Review Issues

5. Provide missing data for 24-month average emissions. The two-year tables listed in Appendix 6.2-1.1 on pages 10, 12, 14, 16, and 18 state 24-month average emissions but only include 20 months of data. The 25 months average emission data on the same pages include only 8 months of data.
6. The emission comparison between the new turbines and existing boilers lists emissions from the boilers prior to the additional boiler controls required in 2003 by District Rule 429. Please provide the estimated boiler emissions in 2003 after the additional controls and include that emission scenario with the comparison data presented in Table 6.2-4.
7. Page 6.2-46, Table 6.2-33: There has been no analysis of the potential for secondary particulate formation due to the increase in ammonia emissions (and SO₂ emissions) that would occur from the project. Ammonia can readily combine with NO_x emissions to produce particulate ammonium nitrate (NH₄NO₃). The applicant needs to analyze the potential for the MMPP project to produce secondary particulate formation in the project region.
8. Provide a complete emission analysis for the demolition phase of the project. This analysis was excluded in Appendix 6.2-5, Section 6.2-5.2 Demolition. Our experience with large demolition projects leads us to conclude that the emissions from the demolition phase could well be significant, and certainly contribute to overall construction phase impacts. In addition, demolition activities have the potential to generate various nuisance problems. We therefore believe the air quality impacts from demolition activities should be assessed and added to the construction phase impacts in Table 6.2-5.3. In addition, suitable mitigation measures for demolition impacts need to be addressed.
9. Page 6.2-51: The application shows that the existing boiler stacks were modeled at 383 feet rather than their actual height of 450 feet due to GEP limitations. It is staff's understanding that GEP considerations apply only to the stack height of a *proposed* facility. Existing sources should always be modeled using actual physical parameters and operating conditions. Please perform modeling of the existing boilers using the actual 450-foot stack height; modeling scenarios should include emission rates at both current levels and after the controls required in 2003.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

10. Page 6.2-60, Table 6.2-39: Are the modeled impacts for one- and eight-hour CO reversed? This also occurs in Table 6.2-44 (p.65).
11. Page 6.2-66, Table 6.2-45: Please identify the regulatory guidance cited that specifies use of the highest second-high 24-hr average PM10 concentration for comparison to PSD Class II increment threshold.
12. Page 6.2-70: Did the visibility screening models include the effect of ammonia emissions from the turbine SCR system?
13. Page 6.2-72: The calculation of construction equipment emissions is based on the assumption that all diesel-powered equipment will comply with the EPA 1996 off-road diesel standards (Appendix Attachment 6.2-5.1). It is questionable that all diesel equipment used for construction will actually be manufactured subsequent to 1996. Unless the applicant desires to be held by a permit condition that requires the use of post-1996 construction equipment, construction emissions for diesel-powered equipment should be based on their applicable emission factors presented in the EPA Non-Road Engine and Vehicle Emission Study Report of 1991, as referenced in footnote (1) of the Appendix Attachment.
14. The construction modeling should be redone to reflect the revised emission factors. Given the predicted NO2 impacts from construction shown in Table 6.2-5.4 (Appendix 6.2-5), it is likely that the revised emission factors will show a predicted violation of the state NO2 standard. If this occurs, then appropriate mitigation (construction phasing, activity management, use of emission controls, etc.) should be identified and modeled to demonstrate the ability to eliminate the standard violation.
 - a. The discussion of construction impacts states that modeled PM10 violations are unlikely due to the conservative nature of the modeling. Please provide a more detailed justification of this conclusion given that the modeled PM10 concentration, without the inclusion of background, is more than twice the state 24-hour standard.
 - b. The discussion also states that "...construction sites that use good dust suppression techniques and low-emitting vehicles typically do not cause violations of air quality standards." Please provide additional support for this statement.
15. Appendix 6.2-8, Page 1: It is stated that, "As is the case of ozone precursors, emissions of PM10 precursors are expected to have approximately equivalent ambient impacts in forming PM10, per ton of emissions on a regional basis." Please provide documentation to justify this assumption.
16. In an August 21, 2000 letter from Gary Rubenstein of Sierra Research to Dennis Jang of the Bay Area Air Quality Management District it was indicated that, "We are scheduling another triplicate test to verify that the first two runs accurately characterize acrolein emissions from the gas turbine at part load." Have these tests been completed? If so, please provide the results.
17. Appendix 6.2-5, Section 6.2-5.3: The discussion of available mitigation measures to control exhaust from heavy-duty diesel construction equipment does not mention the use of soot filters or oxidizing catalysts. Both controls are typical requirements imposed by the CEC on several recent power plant applications. Please provide a

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

description of these controls and how they might be used on the construction equipment employed on your project.

18. Page 6.2-64, Table 6.2-42: What information does this table present? Are these the highest 24-hour PM10 samples measured at each of the sites in the years noted? The table title is misleading, if that is the case.
19. Page 6.2-71, final sentence: Do Federal Class I visibility protection requirements limit the cumulative use of the acceptable 5% increment of deterioration noted? If so, what assessment of use of that increment needs to occur for this impact analysis?
20. Page 6.2-83 through 86: What is the source of these maps, which present very general information about wind flow statewide for each of four quarters? How do the identified "predominant" wind directions relate to associated wind velocities, pollutant dispersion and potential air quality impacts from plant emissions at key receptor sites? Such aspects of impact analysis are typically complex and are resolved through computer modeling. In the case of wind flow at Morro Bay, is it meaningful to present "predominant" wind direction, when other wind roses in the same document show that winds can come from highly variable directions over time?
21. Page 6.2-109, Figure 6.2-14: What is the meaning of "expected violations of the California PM10 standard"? Is this the product of actual violations measured each year times 6, considering the one day in six normal PM10 sampling schedule? Is this conclusion discussed anywhere in the text?

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Alternatives

Author: Sandra Fromm

BACKGROUND

Alternatives: The project applicant has prepared alternatives that include new unit structure alternatives; alternative technologies; alternative cooling technologies, and alternative on-site locations for the proposed combined cycle units; units 3 and 4 continue to operate and units 1 and 2 are replaced by a new 500 megawatt MW combined cycle facility, units 1 and 2 are to shut down as soon as the first combined cycle unit is installed, and then units 3 and 4 will be shut down by 2010 once the second combined cycle is installed.

DATA REQUEST

22. Please provide a detailed blue line construction drawing of the proposed site and the existing site.
23. Please complete the attached worksheet to address the no-project alternative.

BACKGROUND

The Application for Certification (AFC) does not specifically define project objectives.

DATA REQUEST

24. Clearly state the project's objectives.

BACKGROUND

The project site consists of the existing power plant, associated buildings, a baseball field, etc. However, the application does not provide the acreage of the site, nor does it provide details on the amount of acreage that would be required to meet the projects needs.

DATA REQUEST

25. Provide the total acreage required to meet the project objectives.

BACKGROUND

Duke owns a tank farm just northeast of the City of Morro Bay.

DATE REQUEST

26. Please indicate the total acreage of the tank farm.
27. Of the total acreage, how many acres of the site are vacant?

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Biological Resources

Author: Dick Anderson

BACKGROUND

Cooling Water System: The once-through cooling system for the Morro Bay Power Plant, pumps water from the harbor through the power plant and discharges the water into Estero Bay. This process causes losses of biological resources in the water. The project applicant has undertaken studies regarding effects on fish and crabs but not clams.

DATA REQUESTS

28. A goby larvae that is entrained by the cooling water system was previously identified as the federally endangered tidewater goby (*Eucyclogobius newberryi*) using morphologic characteristics, and more recently classified as unknown as a result of DNA analysis. Please provide documentation of the DNA analysis and results. Please provide a letter from the USFWS indicating they agree with the “unknown” finding.
29. The entrainment study being conducted does not include clam larvae. How will you determine effects to clams/clam larvae resulting from power plant operation? Please provide a study plan for this important evaluation.

BACKGROUND

Terrestrial Biology: The construction and operation activities can result in impacts to terrestrial biological resources. Numerous sensitive species and habitats will be affected by this project. Some additional information and clarifications are needed to complete staff’s assessment of impacts.

DATA REQUESTS

30. By habitat type/natural community, please provide the size of the habitat area lost (acreage) due to power plant construction and operation. Include associated facilities and actions (such as laydown areas).
31. Please provide copies of correspondence with the USFWS and/or CDFG regarding federal and/or state listed species and formal and/or informal consultations.
32. Please provide evidence that you have contacted and questioned CDFG as to the need for a “Streambed Alteration Permit(s)” for the bridge over Morro Creek and the gas pipeline boring under Willow Camp Creek.
33. Please provide a copy of the “Coastal Dune Scrub Restoration/Enhancement Plan”.
34. Please provide a map showing where the exclusionary fencing will be placed at the power plant site.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Cultural Resources

Author: Dorothy Torres and Gary Reinoehl

(Caution: Any responses to data requests that identify site locations need to be submitted under confidential cover).

BACKGROUND

Staff needs to be as informed as possible regarding sites that may be impacted during project activities. In addition, the City of Morro Bay has expressed concern that the previous sampling technique may not have been sufficient to support conclusions provided in the AFC Cultural Resource Section p. 6.7-7.

DATA REQUEST

35. Please provide a test plan detailing the potential discovery techniques (such as boring, auguring, or hand excavation) that will be used to determine the presence of subsurface sites in the areas where there is the possibility of discovering previously unearthed cultural resources. Areas identified in the confidential technical report where further investigation appeared warranted were the boring areas of B23 (area approximate), B8, B10, B18 and B24.
 - a. In the test plan, please address the possibility of damage to subsurface sites which may result from the application of the potential discovery techniques identified in the test plan.
 - b. Please discuss the concerns of the City of Morro Bay (as identified in the data adequacy work sheet dated 11/16/00) regarding the presence of intact cultural remains. The City is concerned that the depth, well preserved context and location may make the resources valuable in addressing research questions.

BACKGROUND

The confidential technical report indicates that fill is typically 4-6 feet thick in the Tank Farm area near the coast and 10 feet thick over the rest of the area. The Project Description Section of the AFC discusses hazardous waste cleanup that will be conducted by PG&E after tank removal and before project construction activities begins.

DATA REQUEST

36. Please provide a discussion of excavation anticipated for proposed construction. The discussion should include the anticipated depths of construction excavation and the locations of the excavation. Please also address the depth and potential location of any pilings, poles, supports or trenches that may need to be placed in the ground.
37. Since the tank farm area has already been identified as an area needing hazardous waste cleanup, please provide a discussion of the methods that will be used if data recovery in the tank farm area is necessary. When will data recovery

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

occur in relation to the hazardous waste cleanup? What procedures will be taken to protect archaeologists and monitors?

BACKGROUND

The AFC, Cultural Resource Section 6.7.1.4.2 states that CA-SLO-16 and CA-SLO-239 have been determined to be significant cultural resources.

DATA REQUEST

38. Please provide information concerning who made the determination of significance? Address the research questions that might potentially be answered by data from these sites.
 - a. Has a lead agency made a determination of significance in regard to those two sites? If so, please provide any documentation related to the decision.
 - b. Has either site been proposed for listing on the California Register of Historic Resources (CRHR) or the National Register of Historic Places (NRHP)? If so, please provide any documentation related to the listing.
 - c. The confidential technical report states that measures such as fencing and cultural resource monitoring will be used to ensure that sites are avoided. Have project engineers confirmed that SLO-16 can be avoided? Apart from having cultural resource monitors on site, please clarify the measures that will be used to avoid this site.
 - d. Please discuss plans for avoiding SLO-239 during demolition of the existing plant. Have project engineers determined that it is possible to avoid the site? Please clarify how the site will be avoided during the demolition process, apart from having cultural resource monitors on site.
 - e. Several studies referenced in the AFC and recent surveys for the project have identified evidence of looting and damage to previously recorded sites. Are there any measures in place or planned, at this time of heightened public interest in the area, to prevent additional damage and looting? Please describe any measure being implemented.

BACKGROUND

The Project Description Section of the AFC p. 2-41 discusses roads, bike trails, a parking lot and lay down areas that will be newly constructed. It is not clear to staff whether these areas were included in the records search or previous cultural resource surveys for MBPP.

DATA REQUEST

39. Please define the project area of potential effect (APE). Please also provide the distance from the project site covered by the record search.
40. If there are sections in the defined APE that were not included in the area previously surveyed for cultural resources, please survey them and provide the

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

results of the survey. In addition to archaeological resources, please identify any historic resources that may be encountered adjacent to these proposed project areas.

BACKGROUND

The AFC Cultural Resource Section p. 6.7-4 briefly discusses a cultural resource conservation easement.

DATA REQUEST

41. Please provide information concerning who made the determination of significance and discuss aspects of the site that contribute to a determination of significance including the research questions that might potentially be answered by data from these sites.

BACKGROUND

In the AFC and data adequacy responses you indicated that a record search was completed for the project area. Staff needs additional information to complete the analysis.

DATA REQUEST

42. Please clarify 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 MBPP site, the study area radius, the boundaries of the previously surveyed areas within the study area, and the location of the identified or potential resources (prehistoric, historic or ethnographic) within the study area.

BACKGROUND

For the purpose of analysis, staff must consider any project-related impacts to historic resources or ethnographic resources. Information provided to fulfill data adequacy requirements is not sufficient for staff to conduct an informed analysis. Historic and ethnographic resources are a concern in this urban area. Guidance provided by the Office of Historic Preservation indicates that resources of 45 years or more should be recorded. Guidance in National Register Bulletin 15 lists types of properties that are not 50 years of age that can still be considered significant without being of what the Bulletin terms "exceptional importance". The schedule provided in Table 2-2 of the AFC indicates that the stacks will be demolished in 2004 and the generating plant will be demolished in 2007. Portions of the power plant will be over 50 years of age at that time. Staff needs additional information to complete the analysis.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

DATA REQUEST

43. Please have a specialist who meets the 36 CFR Part 61, Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation in history or architectural history conduct a survey and provide the following information:
- a. Descriptions of buildings, features and structures around the project area that could be affected (directly or indirectly) by the proposed project. The survey may be limited to an area one property deep, bordering on the project site, bike trails, new access roads or laydown areas; unless there is an obvious potential historic resource that may be impacted that is not within the specified one property limit.
 - b. a characterization of the areas (not limited to the depth of one property) in the vicinity of the project and parking lots, and laydown areas (how old, industrial, residential and/or ethnic etc.). Please specifically include the waterfront area, fishing fleet, embarcadero and intake structure facility that will be altered.
 - c. Record buildings, structures features etc. that may be greater than 45 years old on a Department of Parks and Recreation (DPR) Form 523A and provide a copy of that form. The recording may be limited to an area one property deep, unless there is an obvious feature recognized by the historic specialist. For any properties that appear to be potentially eligible to either the California Register of Historic Resources (CRHR) or the National Register of Historic Places (NRHP) complete and record the evaluation portion of the form and provide a copy.
 - d. Include a description of the substation and its features and describe the substation's historic context.
 - e. Please provide a history of the Morro Bay Power Plant that is sufficiently detailed to understand whether the plant might be considered as significant or exceptionally significant. Record the existing Morro Bay Power Plant on a DPR 523 form and provide copies of the forms.
 - f. Please include a list of all cultural resources within the study area that are listed on the California Register including historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the Office of Historic Preservation to be consistent with California Register criteria adopted by the State Historic Resources commission.
 - g. Please indicate which buildings and structures do not need to meet National Register Criterion Consideration G and the justification for the decision.
 - h. Please provide an evaluation of Morro Bay Power Plant and any other properties objects or features that may be significant using the National Register of Historic Places and California Register of Historical Resources criteria (CEQA Guidelines Section 15064.5, (a), (3), (A)(B)(C) & (D)).

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

- i. Staff recommends contact with archaeological and historical societies, museums, or other persons that might have a knowledge of or interest in the historical resources in the project area as part of a historic literature search. In addition, provide copies of inquiries and any responses to your inquiries.

BACKGROUND

In the AFC and data adequacy responses you indicated that a record search was completed for the project area. The letter of response from the Native American Heritage Commission and the letters sent to Native Americans were dated March of 1999. The search of the Sacred Lands File did not provide additional information about the presence of sacred areas. Staff needs additional information to complete the analysis.

DATA REQUEST

44. Please provide information on the number of meetings that you have held to obtain additional information and concerns of Native Americans regarding your project and a copy of the attendance roster for each meeting.
45. Please provide copies of correspondence or summaries of telephone conversations and meetings that document additional information and concerns of Native Americans regarding your project.
46. Please provide copies of correspondence or summaries of telephone conversations and meetings that document the presence of Native American sacred areas in or near the project area.
47. Please provide a copy of a letter previously submitted to applicant (prior to August, 1999) from Chumash tribal elder, MaryTrejo. The subject of the letter is the Chumash traditional use of Morro Rock.

BACKGROUND

You provided a copy of a Memorandum of Agreement (MOA) with the Chumash Council in the AFC to document the way in which you have taken into account the comments and concerns of the Chumash Council. Staff needs additional information to complete the analysis.

DATA REQUEST

48. Please provide copies of all other MOAs with groups, organizations or persons that have expressed comments and concerns regarding the treatment of cultural resources.

BACKGROUND

Guidelines for the Curation of Archaeological Collections require that collections and records must be housed at qualified repositories that have the capability to ensure adequate permanent storage, security, and ready access to qualified users. Staff wishes to be flexible

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

and responsive to Native American concerns. Staff also wishes to express the opinion that modern societies have a great deal to learn from native groups that have preceded us and suggest that public access be allowed wherever possible.

DATA REQUEST

49. Please explain in detail the objections of the SLOCC to having artifacts curated.
50. Staff requests that Duke comment on the feasibility of the following options and if Duke is aware of additional options, please suggest them:
 - a. Artifacts and records would be curated in a permanent facility that meets the requirements of these guidelines. It may be possible or necessary to limit access by the public to the collection. Perhaps access could be limited to scholars and concerned Native American groups.
 - b. The City of Morro Bay is suggesting that as an avenue to address cumulative impacts of previous PG&E development that Duke consider funding/establishing a permanent facility on-site or in the Morro Bay area to house all artifacts found during all phases of the project or coordinate with existing local repositories of artifacts through the San Luis Obispo County Archaeological Society. Please comment on both the feasibility of establishing a facility on site and the possibility of working with a local facility.
 - c. One of the concerns expressed by the SLOCC is that artifacts remain on site. A potential way to do this would be to establish an onsite facility that meets necessary state guidelines. The facility could have a vault below ground for curation of artifacts Native Americans want to have remain on site.

BACKGROUND

In the City of Morro Bay's review of data adequacy dated 11/16/2000, the City suggests several options for addressing past cumulative impacts of PG&E development.

DATA REQUEST

51. Staff would like Duke to discuss the following City suggestions.
 - a. Suggestion 1a requests that Duke prepare an onsite archaeological site stabilization plan addressing eroding surfaces, and use of protective fill and shallow rooted vegetation. Please discuss this plan in relation to other landscaping or erosion control plans.
 - b. Suggestion 1b requests that Duke prepare an offsite archaeological site stabilization plan for portions of sites within the California Department of Transportation (Caltrans) improvement activity along State Highway 41. Is this improvement defined as part of the current project?

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

Volume IV, Section 6.7 of the AFC provided a copy of a request to the Native American Heritage Commission (NAHC) requesting a list of representatives of the Native American community who wished to be notified concerning construction disturbances in their area. This section also provided copies of letters that were sent to Native Americans in 1999. The letters described the previously proposed project.

DATA REQUEST

52. Please contact the NAHC and obtain a current list of representatives of the Native American community who wish to be notified concerning construction related disturbance in their area.
53. Please send a letter to the groups and individuals provided as contacts by the NAHC. In the letter, describe the project and attach a map of the project area. Provide copies of sent letters and any responses received. If responses are received by telephone, please provide summaries of any conversations.
54. Please contact the NAHC for an updated search of the sacred lands file. Please provide a copy of the response from the NAHC.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Efficiency

Author: Arden Walters

BACKGROUND

HRSG duct firing is described in the AFC as a means of providing peaking power. The AFC does not present independent heat rates for HRSG duct-firing peaking operation that would allow the efficiency of HRSG duct firing to be directly compared to other peaking options available to the MBPP. Also, the AFC does not present an evaluation of other, more energy efficient, alternatives that might be used instead of, or in conjunction with, HRSG duct-fired peaking.

DATA REQUEST

55. Please provide the net heat rates for HRSG duct-fired peaking operation (i.e., the Btu/hour of gas consumed to produce the peaking net kw gain) for the three (3) HRSG duct-fired temperature cases.
56. Please identify which of the more energy efficient alternatives to HRSG duct firing, if any, that were considered for increasing generation capacity at the new proposed combined cycle MBPP and the reasons for their rejection.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Geology and Paleontology
Author: Neal Mace and Robert Anderson

BACKGROUND

Section 6.3.1.5.3 Tsunami of the AFC discusses historic tsunamis in Morro Bay during 1878, 1953, 1960 and 1964. However the AFC does not provide any discussion of the tsunami run up during these events. In addition, the AFC does not provide any discussion of tsunami run up during a 100-year event.

DATA REQUEST

57. Please provide a discussion of the characteristics of the tsunami run up during the 1878, 1953, 1960, and 1964 tsunamis and the run up anticipated during a 100-year tsunami event.

BACKGROUND

Section 6.3.1.4.2 of the AFC indicates that the peak horizontal ground acceleration for the site is 0.33g, which was based upon a magnitude 6.8 earthquake occurring on the Los Osos Fault. The maximum credible earthquake is not used in the design of the project. Chapter 16, Section 1629A.1 of the California Building Code (1998 edition) requires that structures that are not to be built to withstand forces imparted onto them from the ground motion of the "upper bound earthquake" (defined in section 1631A.2 part 6), and that fall under the requirements of section Chapter 16, are to be built to withstand the Design Basis Ground Motion or wind loads, whichever is greater.

DATA REQUEST

58. Please define the design basis ground motion for the project and describe how the motion was determined.

BACKGROUND

There is a concrete batch plant adjacent to the northeast corner of the proposed project which indicates the nearby presence of sand and gravel, hence, possibly paleontologic, resources. Staff must determine if these local resources utilized by the concrete plant will be impacted by the proposed project. The applicant has not indicated whether or not the sand and gravel for the concrete batch plant is locally produced or imported from off-site.

DATA REQUEST

59. Please indicate on the site geologic map the location of the concrete batch plant and any local deposits of sand and gravel. In addition, please provide a discussion regarding the availability of local sand and gravel resources.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Land Use

Author: Sue Walker and Mark R. Hamblin

BACKGROUND

The AFC does not explain the land division procedure that was used (e.g. parcel map, etc.) to divide the original PG&E Morro Bay Power Plant (MBPP) property which created the 2 parcels consisting of 107 acres now owned by Duke Electric Company and the remaining acreage owned by PG&E which contains the switchyard (AFC, Figure 6.13-6, page 6.13-43). The State Subdivision Map Act (*California Government Code Sections 66410-66499*) provides the State requirements and procedures for conducting a land division for the purpose of sale, lease or finance.

DATA REQUEST

60. Explain the land division procedure used to divide the former PG&E MBPP property to create the current two parcels consisting of 107 acres owned by Duke and the remaining property owned by PG&E.
61. Please state the exact acreage for the Duke owned parcel and the PG&E owned parcel.
62. Please provide the exact acreage for the existing and proposed power plant facilities.

BACKGROUND

The AFC does not provide a diagram depicting construction access routes and associated features/activities relative to the 25- and 100- foot Environmentally Sensitive Habitat buffer areas depicted on Figure 6.9-7.

DATA REQUEST

63. Please provide a map that displays construction related activities in relationship to the 25- and 100- foot Environmentally Sensitive Habitat buffer zones, including Dune Scrub, as depicted in AFC Figure 6.9-7.

BACKGROUND

Pages 1-22 and 6.9-9 of the AFC indicate that the Applicant proposes to develop a long-term site plan for the project property in cooperation with the City of Morro Bay (City). In order to more fully assess the long-term land use ramifications of the MBPP project, staff needs any conceptual/preliminary information that has been identified for inclusion in the long-term plan.

DATA REQUEST

64. Please provide information regarding Duke Energy's proposed long-term land use for the entire 107 acre MBPP site in addition to the power plant facility.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

Sections 1 and 6.9 of the AFC indicate that the Applicant proposes to purchase a property adjacent to the project property, referenced as the “Den Dulk Property.” The AFC notes that Den Dulk Property will be used to “further improve coastal access, avoid potential development of sensitive habitats, provide a buffer between the new plant and public uses, and may facilitate the City of Morro Bay’s implementation of its Waterfront Master Plan” (p. 6.9-2). Additionally, Figure 6.9-2 indicates that a portion of the project’s proposed new bikeways would be located within the Den Dulk Property.

DATA REQUEST

65. Please provide the following information regarding the Den Dulk Property:
 - a. Is any component of the MBPP or its ancillary facilities dependent on the property?
 - b. What is the acreage of the property?
 - c. Was this property created in accordance to the State Subdivision Map Act?
 - d. Will the property be developed in any way other than as described on page 6.9-2?
 - e. Will the long-term uses of the property be included in the project’s long-term site plan? If not, the City has requested that such a plan for the property be prepared that will address non-industrial uses of that portion of the property that is not currently occupied by the existing facility.
 - f. Will any portion of the property be leased or subdivided? If so, please describe these plans and any regulatory review and approval processes required for them.
 - g. If the property cannot be acquired, how does the Applicant plan to re-route the proposed bikeway and/or otherwise modify the project?
 - h. How will acquisition of the property comply with the City’s Water Front Master Plan?
 - i. How will the property provide a buffer between the new plant and future public access to coastal areas?

BACKGROUND

The AFC references the proposed project as a “modernization” and “replacement” of an existing facility, as opposed to an “expansion.” Staff needs to ensure that the project, as a modernization effort, is consistent with the goals, policies and zoning ordinances (City only) of both the California Coastal Commission (CCC) and the City.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

DATA REQUEST

66. Please provide the City's and CCC's definitions of "expansion" and distinguish how the proposed project is exempt from review and processing as an "expansion" effort.

BACKGROUND

Certain aspects of the proposed Project, including but not limited to the intake structure and the area identified in the Waterfront Master Plan as Planning Area #2, are subject to the City's Waterfront Master Plan. The City acknowledges that the Waterfront Master Plan has not been submitted to the California Coastal Commission (CCC) (AFC page 6.9-30); however, the Waterfront Master Plan may still be valid even if the CCC has not approved it. The City has cited Conway v. City of Imperial Beach, in which it was found that a local land use regulation that amends existing regulations, but which does not change permitted uses on a given property, may not require CCC approval. The City holds that the Waterfront Master Plan falls into this category, as it does not change the permitted uses of the planning area. Although the Applicant implies that the proposed project is not subject to the Waterfront Master Plan, the AFC appears to conclude that the proposed project will comply, either fully or partially, with the Waterfront Master Plan.

DATA REQUEST

67. Please demonstrate how the proposed project will comply, either fully or partially, with the City's Waterfront Master Plan.

BACKGROUND

The AFC does not provide a diagram detailing the new high pressure natural gas intertie pipeline, or where the proposed underground boring would occur in relationship to the Willow Camp Creek and adjacent riparian vegetation.

DATA REQUEST

68. Please provide a diagram with details about the new intertie pipeline and proposed boring plans.

BACKGROUND

The AFC discusses the proposed bridge crossing of Morro Creek in several places; however, the document concludes that regulatory permitting outside of the Commission's jurisdiction will not be necessary. It is unclear why permits such as an U.S. Army Corps of Engineers Section 404 permit or a California Department of Fish and Game Streambed Alteration Agreement are not required for construction of the bridge.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

DATA REQUEST

69. Please provide a summary of all required discretionary review and approvals for both the bridge and the proposed project, and an explanation as to why they may or may not be necessary.

BACKGROUND

Section 6.9.2 provides a description of the project site and surrounding land uses. Section 6.9.2.2 provides a listing of sensitive lands and Open Space areas within the vicinity of the project site. However, there is no identification of any sensitive receptors (schools, hospitals, community centers, etc.) within a one-mile radius of the project site.

DATA REQUEST

70. Please provide a summary of the types and locations of any sensitive receptors within a one-mile radius of the project site.

BACKGROUND

The AFC indicates that the Morro Bay Power Plant (MBPP) is located within an estimated 107-acre site, denoted on figures as the "site boundary." However, the facility itself is located only on a portion of the 107 acres. Figure 6.9-1 (Land Use Designations Map) and Figure 6.9-8 (Morro Bay Vicinity Zoning District Map) indicate that the entire project property is not zoned /designated as Coastal Dependent Industrial/Coastal Development. To ensure that the MBPP and its related ancillary facilities lie within the Coastal Dependent Industrial/Coastal Development zone/land use designation, it is requested that the physical boundaries of both the existing and proposed MBPP project components be overlaid onto Figures 6.9-1 and 6.9-8.

DATA REQUEST

71. Please submit revised Figures 6.9-1 and 6.9-8 indicating the actual "footprints" of the existing and proposed MBPP and its ancillary facilities.

BACKGROUND

Figure 6.9-7 of the AFC depicts Environmentally Sensitive Habitat and 25- and 100- foot buffers surrounding them. City Land Use Policy 11.22 requires that the boundaries of Environmentally Sensitive Areas be established based on field studies paid for by the Applicant and performed by the City or its selected consultant(s). It is not clear if this study was completed or how the buffers and Environmentally Sensitive Habitat Areas were determined.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

DATA REQUEST

72. Please provide details regarding how the Environmentally Sensitive Habitat Areas and buffers were determined, and the credentials of those consultants who performed this work.

BACKGROUND

Page 6.1-6 (third full paragraph) of the AFC indicates that potential cumulative impacts could occur if construction of the currently proposed smaller projects within the City occurs at the same time as construction of the MBPP project. Table 6.1-1 additionally notes these potential cumulative impacts under the land use column. However, page 6.9-66 (fifth full paragraph) concludes that no cumulative land use impacts are likely to occur as it is assumed that all proposed projects will be consistent with all applicable land use policies, goals and zoning requirements of the City. In addition, page 6.9-66 (second full paragraph) indicates that there are 17 proposed projects within a five mile radius of the MBPP site; however, it is unclear which of the 25 sites listed in Table 6.1-1 fall within this five-mile boundary. It is also noted that page 6.9-68 indicates a 31 month construction schedule for the MBPP, whereas page 1-21 indicates a 21 month construction schedule.

DATA REQUEST

73. Please identify the 17 proposed projects referenced on page 6.9-66, and provide any known information regarding their review, approval and construction status.
74. Please clarify the types potential cumulative land use impacts indicated in Table 6.6-1.

BACKGROUND

AFC page 6.11-24 under Oil and Gas Pipelines states that Duke Energy has an offshore terminal for unloading fuel oil to operate the Morro Bay Power Plant. The offshore terminal is in "caretaker status" since the plant now operates on natural gas only.

DATA REQUEST

75. Please explain Duke Energy's future plan for the offshore terminal. Explain "caretaker status".

BACKGROUND

AFC page 6.9-29 (third full paragraph) states that the project is within a Coastal-Dependent Industrial District (M-2) which "permits power plants subject to the requirements for a conditional use permit or its equivalent for new facilities. State law provides for certification of a power plant's AFC by the Commission in lieu of any local requirements to obtain a conditional use permit. Therefore, Commission certification of the Project satisfies the City requirements . . ."

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

In accordance to the Warren-Alquist Act the project must meet local zoning ordinances. The Warren-Alquist Act imposes a general “conformity” requirement that a proposed new or modified energy facility meet the local government’s zoning standards in order to grant it a license to operate (Section 25525, Warren-Alquist Act).

DATA REQUEST

76. Please demonstrate in writing that the proposed facility will be in conformance with each of the City of Morro Bay’s “findings” for the granting of a conditional use permit in accordance to their zoning regulations.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Noise

Author: Jim Buntin

BACKGROUND

The data in two tables in Section 6.12 appear to be incomplete or incorrectly labeled.

DATA REQUEST

77. In Tables 6.12-10 and –11, the RV Park site is labeled as either Site 5 or Site 10. Please clarify the data in these tables with respect to these sites.
78. It appears that Table 6.16-11 is incorrectly labeled. Please confirm that this table refers to demolition of the Power Building and Stack.

BACKGROUND

The duration of the overall construction period is given, but the duration of the demolition activity is not stated (AFC Section 6.12).

DATA REQUEST

79. Please state the duration of the demolition activities.

BACKGROUND

The extensive plant-related noise mitigation measures are primarily geared toward achieving the noise standards at the RV Park. However, ambient noise levels at this site are only estimated, without a clear reference to the basis of the estimates. Given the importance attached to the RV Park as a sensitive receptor, it is important to adequately describe ambient noise levels there.

DATA REQUEST

80. Please conduct and document a 25-hour noise level survey to more fully describe ambient noise levels at the RV Park.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Reliability

Author: Arden Walters

BACKGROUND

The description of gas supply reliability of the Morro Bay Power Plant (MBPP) presented in AFC Section 8.5 RELIABILITY, 8.5.1.1 Source of Natural Gas Supply, does not mention pipeline interties with PG&E Line 306 that could improve gas supply reliability to the MBPP. PG&E Line 306 is 70 miles long and is vulnerable to multi-day unplanned outages. Pipeline interties near Morro Bay with other gas pipelines might be able to provide gas to the MBPP to keep one, or more, of the proposed new combined cycle units operating during an upstream unplanned outage to PG&E Line 306.

DATA REQUEST

81. Please identify any pipeline interties with PG&E Line 306 and indicate if they could be used to improve the reliability of natural gas supply to the proposed new combined cycle units at the MBPP.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Socioeconomics

Author: Michael Fajans

BACKGROUND

The AFC (page 6.10-16) describes the number of recreational vehicle (RV) parks in San Luis Obispo County and specifically Morro Bay and Table 6.10-7 provides the number of hotel/motel rooms in San Luis Obispo County. It is mentioned that the Morro Dunes RV Park is within the boundary of the MBPP and leased from Duke Energy. In areas where some construction workers may seek temporary housing, RV parks, motels, hotels, and other seasonal housing provides a potential resource.

DATA REQUESTs

82. Please provide approximate occupancy rates (and typical number of vacant spaces) for all RV parks listed on page 6.10-16 during the past 12-18 months, illustrating any seasonal variation. Please provide information on use restrictions and space rental rates. In your response, please discuss the impact of a population increase on transient housing (motels, hotels, RV parks, campgrounds). Consider the monthly occupancy rates of those facilities to ensure that impacts to tourism are included.
83. Please provide the occupancy rate by month for hotel and motel rooms for hotels and motels listed in Table 6.10-7.
84. Please provide an estimate of workers who temporarily will live in boats moored in the harbor (liveaboards).
85. Please provide an estimate of the impacts on harbor-related facilities (bathrooms, boat ramps, increased harbor patrol, pumpout facilities) from workers who occupy liveaboards.
86. Please provide the number of vacant houses that are seasonal/vacation homes and are available as transient housing.

BACKGROUND

Figure 6.10-4 provides work force loading by month for project construction. Table 6.10-17 provides data on construction labor needs by craft. Additional information is needed to understand the phasing of workers in various trades.

DATA REQUEST

87. Please indicate approximate phasing of craft trades by providing a figure which provides the number of construction workers by craft for each month over the 72 month construction cycle.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

Table 6.10-17 on page 6.10-35 indicates available labor by craft, citing total workers in San Luis Obispo and Santa Barbara Counties by craft. Footnote 2 indicates that “Based on characteristics of the local work force, the number of workers required would be readily available.” Footnote 3 describes the engineering management skills required for the project.

Page 6.10-36 indicates that less than 5% of the project construction work force may commute to the site on a workweek basis.

DATA REQUEST

88. Please provide source documentation for footnote 2. Also please provide information on the numbers and availability of local boilermakers, ironworkers, millwrights, and pipefitters, since very high proportions of the skilled craftsmen in these categories are assumed to be locally available.
89. Engineering management personnel (cited in footnote 3) are likely to be permanent employees of a construction management firm or Duke Energy. Please explain how these personnel are likely to be permanent local residents. If not permanent local residents, provide the number of employees expected to relocate from other Duke locations during the construction phase.
90. Please indicate the basis for the statement that less than 5% of the construction workforce will commute on a workweek basis. In your response, please provide estimates of workers who will commute daily and weekly in the form of numbers and percentages and a discussion of how those numbers are calculated.
91. Please provide an estimate of the number of workers who will temporarily relocate in the form of numbers and percentages and a discussion of how those numbers are calculated.

BACKGROUND

Page 6.10-38 of the AFC cites the estimated construction payroll and value of equipment and materials that will be purchased locally during construction.

DATA REQUEST

92. Please provide documentation of how this was calculated.

BACKGROUND

Page 6.10-39 indicates tourism trends in Morro Bay for 1998 to 1999.

DATA REQUEST

93. Please provide data for 1999-2000 tourism trends, including Transient Occupancy Tax, if available.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Soils and Water Resources

Authors: Joe Crea, James Hennemorth and Dominique Brocard

BACKGROUND

A complete and detailed stormwater and erosion/sediment control plan for the facility and all linear facilities is needed as part of the Storm Water Pollution Prevention Plan (SWPPP).

DATA REQUEST

94. Provide a stormwater and an erosion/sediment control plan for the facility and all associated linear facilities. The plan should include a detailed set of drawings that depict existing and proposed topography, structures, facilities, staging areas, and soil stockpile areas. BMP related facility locations as well as a construction sequence should be provided on the drawings. A mapping symbols legend should also be included on the drawings. The narrative should include stormwater calculations and vegetative stabilization procedures. As part of the SWPPP, provide a hazardous materials storage and disposal plan along with measures for spill prevention and containment. The plan should also identify maintenance and monitoring efforts for all erosion, stormwater runoff control and revegetation efforts.
95. Please provide the pre and post discharge (Q) for the 100-year frequency and 24-hour duration runoff event.
96. Please provide mapping that shows the entire existing and proposed drainage routes for the stormwater pipeline.
97. Figure 8.5 in the AFC displays sandbags as the primary erosion control facility; however, page 8-16 in the AFC mentions the installation of silt fence and haybales. Please clarify the inconsistency between the narrative portion of the text and the drawings.
98. Section 8.2.1 in the AFC states that site drainage facilities will be designed for the flow resulting from a 10-year storm frequency and then states that the drainage facilities will be designed to prevent flooding of permanent plant facilities during a 100-year storm. However, Section 2.2.3.16 in the AFC states that site drainage facilities will be designed for the flow resulting from a 100-year, 24-hour rainfall. In addition, the paragraph regarding drainage ditches on page 8-15 of the AFC states that drainage ditches will be designed to handle the 50-year storm frequency runoff event. Staff needs further clarification/rationale regarding the aforementioned statements. Please provide the proper design for all drainage facilities.

BACKGROUND

Any earth disturbance activity involving 5 or more acres will require a National Pollutant Discharge Elimination System (NPDES) permit for Stormwater Discharge from a construction activity.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

DATA REQUEST

99. Please provide a copy of the NPDES permit application for stormwater discharge associated with the proposed Morro Bay Power Plant project

BACKGROUND

A more detailed description is needed regarding the City of Morro Bay Zoning Ordinance 17.48.300.

DATA REQUEST

100. Please provide detailed descriptive provisions associated with any grading activities within the City of Morro Bay. Please include an explanation of why specific provisions of the Morro Bay Grading Ordinance are applicable to this project.

BACKGROUND

The AFC mentions that the cut and fill operations will be balanced.

DATA REQUEST

101. Please provide the volume of cut versus fill for grading and as excess spoil material.

BACKGROUND

Section 316(b) of the Clean Water Act requires that "...the location, design, construction, and capacity of the cooling water intake structures reflect the best technology available for minimizing adverse environmental impact." The applicant has proposed to use the existing intake structure "without significant modification".

DATA REQUEST

102. Please provide an assessment of alternative technologies for the intake of the cooling water system considering advancements to the technologies since the installation of the current intake design. The scope of the assessment should address alternative intake technologies including but not limited to offshore versus onshore intake locations, behavioral barriers, diversion systems, physical barriers, and fish collection and conveyance.

BACKGROUND

The existing cooling water intake and discharge system for units 1-4 will be used for the new combined cycle units. This will require a new NPDES permit application from the Regional Water Quality Control Board. Appendix 6.5-4 contains a partial application but does not provide information requested in Section VI. As part of staff's analysis of the proposed

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

project, it is necessary for a draft of a complete NPDES permit to be available prior to the Final Staff Assessment.

DATA REQUEST

103. Please provide a schedule for filing the application for the new NPDES permit as well as expectation as to when the permit is to be issued. Please provide a complete copy of the new NPDES application. Also please provide all supplementary information requested by the Regional Water Quality Control Board staff.

BACKGROUND

In addition to the cooling water system water use at the plant will include steam cycle makeup, evaporative cooler makeup, equipment cooling, equipment wash, sanitary and potable use. The water balance shown in appendix 8-2 shows annual and normal flows. During periods of peak operations the water use will increase for these uses.

DATA REQUEST

104. Please expand Table B-1 in Appendix 8-2 to include peak uses of water shown in gallons per minute.

BACKGROUND

Potable water requirements will be supplied by on-site water production wells that are located along the northern boundary of the site. The northernmost of the plant wells is 150 feet from a City of Morro Bay water supply well. The potential exists that plant wells and the city operated wells may influence one another.

DATA REQUEST

105. Please provide information on the zone of influence, historical production rates, and water quality records for the plant and the city water supply wells.

BACKGROUND

Wastewater will be generated on site from the screenwash, various blowdowns, floor drains, stormwater runoff, equipment wash, sanitary, and water treatment systems. Some of this water will be discharged to the cooling water system outfall (bay), some to the discharged to the city sewer system, some disposed of off-site. Prior to discharge these waste streams must be within permissible discharge levels and characteristics.

DATA REQUEST

106. Please prepare a table of the specific quantities of wastewater from each of the sources showing normal and maximum quantities and the location of the final discharge.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

107. Describe any treatment prior to discharge to be performed on each of the wastewater streams. Prepare a table showing the specific constituents that will be present in each of the wastewater discharge streams as well as final discharges of combined wastewater streams and compare these to the legal discharge permit levels.

BACKGROUND

The Central Coast Regional Water Quality Control Board is considering whether the proposed project qualifies as an existing or a new discharge. For existing discharges, the California Thermal Plan requires protection of the beneficial uses and areas of special biological significance. In order to make this determination, delineation of the thermal plume is required.

DATA REQUEST

108. Please provide cross-section dimensions and elevation of cooling water discharge channel as it exits into Estero Bay. Please provide tidal elevations relative to the same datum.
109. Please provide information on the temperature difference between the water withdrawn from Morro Bay by the cooling water intake and background waters in Estero Bay.
110. Please provide estimates of the thermal plume from the proposed project in terms of contours of temperature rises above the ambient.

BACKGROUND

For new discharges, the California Thermal Plan has several requirements which are not met by the proposed discharge.

DATA REQUEST

111. Please provide a detailed discussion of alternatives to the existing cooling water discharge including dimensions and costs. Alternatives should include an offshore discharge, as mandated by the California Thermal Plan for new discharges, with a single port, or more likely a multiport outfall.

BACKGROUND

Morro Bay's municipal water supply wells located near the plant's wells are contaminated by MTBE. The impact of the proposed groundwater withdrawals on the contaminant plume has not been documented.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

DATA REQUEST

112. Please provide an assessment of the impact of the proposed changes in groundwater withdrawals to the groundwater regime in the area, and its potential impact on the MTBE contamination.
113. What alternatives exist to supply freshwater needs for MBPP construction and operation if pumping from the on-site wells proves to be a problem due to potential MTBE contamination?

**Morro Bay Power Plant
Data Request 1
(00-AFC-12)**

TECHNICAL AREA: Traffic and Transportation

Author: James Fore

BACKGROUND

To determine the impact that the Morro Bay Power Plant project will have on traffic, a determination of the peak hour traffic needs to be established. Section 6.11.1.3.4 of the AFC indicates that peak hour traffic operations were evaluated within a.m. and p.m. peak periods.

DATA REQUEST

114. Please indicate the dates that the peak-hour traffic counts were made at the intersection analyzed.

BACKGROUND

To analyze the impact that the project will have on traffic, the peak hour traffic volumes need to reflect the time period that the construction is to occur. Because of the long duration of this project, a forecast of the changes in traffic volumes without the project needs to be done for a base to compare the impact that construction traffic will have on the area.

DATA REQUEST

115. Please provide the existing peak hour traffic, the anticipated growth in traffic to be added to the existing traffic over the next eight years without the proposed project and the addition of project related traffic over the same time period.
116. Please provide this information in table form for each intersection evaluated.
117. Since the traffic in Morro Bay varies with tourist season, please indicate the expected change in volume and traffic patterns that are anticipated to occur during the summer tourist season.

BACKGROUND

In Section 6.11.2.1.2.1, Stage II Construction Employee Vehicle Assumption the estimates for the daily peak time periods for the eight months of construction with highest staffing levels includes 1,251 daily peak hour trips. The section indicates that this estimate is composed of 462 project morning peak hour trips, 60 street morning peak hour trips, 73 evening street peak hour trips and 409 projected afternoon peak hour trips. The total for the above peak hours trips is 1,004.

DATA REQUEST

118. Please explain why the total does not add to the 1,251 daily peak hour trips.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

The AFC indicates that in Stage II there will be two shifts and that a shift will be 10 hours. If the day shift starts between six and seven it will be releasing workers during the evening peak traffic hour.

DATA REQUEST

119. Please provide more information on the shift schedule, times for the day and evening shifts and possible action to reduce the impact on peak hour traffic.

BACKGROUND

The AFC indicates that offsite staging areas will be used for equipment delivery and employee parking.

DATA REQUEST

120. Please indicate possible locations for offsite employee parking, how they will get from the parking area to the project site, and how the project plans to encourage employee to use this site.
121. Please indicate the possible location of offsite staging areas and the truck routes that will be used to move equipment and supplies from the staging areas to the job site.

BACKGROUND

The project will be using aqueous ammonia to reduce nitrogen oxide emissions.

DATA REQUEST

122. Please indicate the frequency of shipments for the aqueous ammonia.
123. Please indicate the possible routes the aqueous ammonia trucks will take to deliver the solution (from the expected source to plant site).
124. Please identify any difficult or potentially hazardous roadway conditions that exist on the route for trucks transporting aqueous ammonia.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

TECHNICAL AREA: Transmission System Engineering
Authors: Laiping Ng and Al McCuen

BACKGROUND

Staff needs a complete interconnection study to analyze the reliability implications and to be confident of identifying any downstream facilities necessary for the interconnection of the Morro Bay Power Plant to the Pacific Gas and Electric (PG&E) system. Such interconnection should 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.

DATA REQUEST

125. Please provide a System Impact / Facilities Study for 2003. The Study should include:
 - a. Normal system operation,
 - b. Important N-1 contingencies,
 - c. Critical N-2 contingencies.
126. Please provide the power flow, stability, fault duty study, and load flow diagrams that demonstrate conformance or non-conformance with utility reliability and planning criteria for the first year of operation.
127. Please identify the proposed mitigation methods for criteria violations.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Visual Resources

Author: William Walters and Michael Clayton

BACKGROUND

The visible water vapor plume discussion in the AFC, Section 6.13.2.5, does not provide the data, assumptions, modeling procedures, and modeling results used by the Applicant to make their conclusion that the Heat Recovery Steam Generator (HRSG) stack exhaust water vapor plumes would be visible approximately 200 hours per year, 70 daylight hours per year, and would occur less frequently than plumes from the existing boilers. Additionally, the Applicant's assessment does not provide quantified calculations of the size, duration and frequency of the plumes under specific timeframes and meteorological conditions. Staff will conduct a separate plume modeling analysis to confirm the Applicant's conclusions and determine the HRSG plume frequency and size characteristics. Staff will require additional project and site data to complete this analysis.

DATA REQUEST

128. Please provide the following information regarding the HRSG stack exhaust parameters. (Please identify whether the values are the same for each stack, or if they differ, provide values for each stack independently).
- a. Stack Exhaust Temperature;
 - b. Moisture Content (% by Weight);
 - 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 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.

129. Please provide hourly meteorological data files from a meteorological monitoring station located near the project site that includes, at a minimum, the following parameters:
- a. Year, Month, Day, Hour
 - b. Ambient Temperature and Relative Humidity
 - c. Wind Speed and Wind Direction (from Direction)
 - d. Stability Class

A minimum of five sequential years should be provided. Additional meteorological parameters, such as rain or other visibility obscuring phenomena, should be provided if available. Please provide the meteorological data files in an ASCII

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

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.

130. Please provide the existing boiler stack exhaust conditions (temperature, relative humidity, etc.) that were used to make the determination that the project's plume frequency will be less than the existing power plants plume frequency.

BACKGROUND

The response to the Data Adequacy Request regarding cumulative impacts (Ref: November 21, 2000 Data Adequacy Letter) contained in the applicant's December 8, 2000 Responses document states that "the projects that may contribute to cumulative impacts when considered together with the proposed Project are discussed in Section 6.1.4 and are illustrated in Figure 6.1-1."

DATA REQUEST

131. Please specify by key observation point which cumulative projects would be visible within the same field of view as the proposed project and characterize the extent of each project's potential visibility.

BACKGROUND

The response to the Data Adequacy Request regarding cumulative impacts (Ref: November 21, 2000 Data Adequacy Letter) contained in the applicant's December 8, 2000 Responses document states that "the sound wall will be made of steel or aluminum and can be completed in a variety of colors to be consistent with existing and proposed aesthetic conditions at the site. Design treatments could be applied to the wall to provide visual interest and minimize its effect on the viewshed." The AFC (pp. 6.13-54 and 55) presents the results of a color study for the proposed facilities. As illustrated in the simulations of the proposed project presented for KOPs 5, 6, 7, and 20, the complex industrial forms and industrial metallic surfaces of the proposed facilities, regardless of color, do not integrate well with the existing natural, "rough hewn" surfaces of the coastal landscape. The color and textures of the existing power plant facilities appear more compatible with the existing landscape character than do the proposed facilities.

DATA REQUEST

132. Please describe what alternative design treatments are feasible to soften the hard, metallic, industrial character of the proposed powerplant structures and sound wall. Development of alternative design treatments should follow consultations with CEC staff and representatives of the City of Morro Bay.
133. Please provide five sets of 11" x 17" high-quality color photocopies of the existing view and daytime photosimulation (at life-size scale based on an 18-inch view/reading distance) of the alternative design treatments as viewed from KOPs 5, 6, and 20.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

The response to the Data Adequacy Request regarding lighting (Ref: November 21, 2000 Data Adequacy Letter) contained in the applicant's December 8, 2000 Responses document states that "Specific lighting plans have not been designed for the Project, however, it is reasonable to assume that lighting would be provided at egress points, doorways and entrances, and along stairs and platforms of the Project for safety purposes." The response further states that "These areas would be illuminated sufficiently to ensure safe working conditions and the luminars would be fitted with caps or shields to minimize upward glare." Given the prominent visibility of the proposed project as viewed from several key observation points in and around the city of Morro Bay, and due to the foreground to middleground proximity of the project site to a number of residential neighborhoods, staff will need additional information on facility lighting in order to adequately assess the potential for visual impacts resulting from nighttime project visibility and light and glare.

DAT3 REQUEST

134. Please describe the existing lighting sources and level in the vicinity of the proposed project site.
135. For each KOP requiring further analysis (to be identified at the Data Request Workshop) please describe the existing nighttime visibility of the project site including the existing stacks and switchyard and the extent to which existing lights are visible at the site. Similar conditions for multiple KOPs may be grouped into general statements.
136. Please describe the lighting to be used for the proposed project including type, location, intensity, and typical duration of use.
137. Please state whether the applicant would also commit to using timers, sensors, and/or switches to keep lights off when they are not needed.
138. Please specify for which types of lighting (or locations) various controls would be provided.
139. For each KOP requiring further analysis (to be identified at the Data Request Workshop), please describe the visibility of proposed project lighting and non-project ambient lighting as well as the visibility of project components including the exhaust stacks and vapor plumes due to illumination from project and ambient lighting.
140. Please provide five sets of 11" x 17" high-quality color photocopies of a nighttime existing conditions photograph that encompasses the existing power plant and proposed project site, paired with a nighttime photosimulation of the proposed project following demolition of the existing power plant (both at life-size scale based on an 18-inch viewing/reading distance), as viewed from KOP 14.

BACKGROUND

The response to the Data Adequacy Request regarding the water intake building (Ref: November 21, 2000 Data Adequacy Letter) contained in the applicant's December 8, 2000

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Responses document provides information on the architectural design of the water intake building. However, the AFC does not discuss potential design modifications to minimize the height of the intake building.

DATA REQUEST

141. Please discuss the feasibility of alternative designs to minimize the height of the intake building. If the building contains fixed equipment such as cranes, discuss the feasibility of redesigning the building to take advantage of portable cranes as is discussed on AFC page 2-15 for the power building.

BACKGROUND

The response to the Data Adequacy Request regarding visible water vapor plumes (Ref: November 21, 2000 Data Adequacy Letter) contained in the applicant's December 8, 2000 Responses document provides information on annual visibility of an average plume and presents the information for both daytime and nighttime hours. Similar information is not provided for a reasonable maximum plume size (occurring 10% of the time).

DATA REQUEST

142. Please specify whether the information provided in the applicant's response to the Data Adequacy Request regarding visible water vapor plumes is for one HRSG stack or represents a combined plume from all four HRSG stacks.
143. If the plume data is for one HRSG stack, please provide similar information for the combined HRSG stack plume.
144. In addition to the applicant's response to data adequacy, please provide annual plume visibility information for both daytime and nighttime hours for the average and reasonable maximum plume length (occurring 10% of the time) including:
 - a. the total number of operational hours per year that the plume will be visible;
 - b. the percentage of the total number of operational hours per year that the plumes will be visible;
 - c. the number of daylight hours per year that the plume will be visible;
 - d. the percentage of daylight hours per year that the plume will be visible;
 - e. the number of nighttime hours per year that the plume will be visible;
 - f. the percentage of nighttime hours per year that the plumes will be visible.
145. For both average and reasonable maximum length plumes, please calculate plume heights, widths, and lengths.
146. For both average and reasonable maximum length plumes, please calculate the values requested in the above two data requests after eliminating periods when fog occurs.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

147. Please specify the duration of plume formation for both average and reasonable maximum length plumes.
148. Please identify the data sources, assumptions, and calculations used to derive these estimates, including the model used.
149. Please summarize primary directional plume drift by quarter and annually based on windrose and meteorological data provided in Section 6.2 Air Quality.
150. For each KOP requiring further analysis (to be identified at the Data Request Workshop), please describe the extent to which the reasonable maximum length plume would obscure other features in the landscape or otherwise affect visual quality as perceived from the specific KOP.

BACKGROUND

The response to the Data Adequacy Request regarding visible water vapor plumes (Ref: November 21, 2000 Data Adequacy Letter) contained in the applicant's December 8, 2000 Responses document states that "Currently, a plume is visible more than half the days in a year and is larger than the projected plume." Staff needs additional information regarding the existing plume.

DATA REQUEST

151. For plumes from the existing stacks please provide annual plume visibility information for both daytime and nighttime hours for an average length plume and a reasonable maximum (occurring 10% of the time) length plume including:
 - a. the total number of operational hours per year that a visible plume occurs;
 - b. the percentage of the total number of operational hours per year that a visible plume occurs;
 - c. the number of daylight hours per year that a visible plume occurs;
 - d. the percentage of daylight hours per year that a visible plume occurs;
 - e. the number of nighttime hours per year that a visible plume occurs;
 - f. the percentage of nighttime hours per year that a visible plume occurs
152. For both average and reasonable maximum length plumes, please provide plume lengths, widths, and heights.
153. For both average and reasonable maximum length plumes, please calculate the values requested in the above two data requests after eliminating periods when fog is expected to occur.
154. Please specify whether the information provided in data responses 21 through 23 is for one of the existing exhaust stacks or represents a combined plume from all existing exhaust stacks.
155. If the plume data is for one exhaust stack, please provide similar information for the combined plume for all of the stacks.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

156. Please identify the data sources, assumptions, and calculations used to derive these estimates, including the model used.

BACKGROUND

The existing photographs and photosimulations presented in the Visual Resources section of the AFC present images that appear approximately one-half life-size scale when viewed at a typical viewing/reading distance of approximately 18 inches. At this scale, the images understate the scale of the various landscape elements, both existing and simulated. The image title blocks note that the image viewing distance should be 8 inches from the eye. It is staff's position that 18 inches is a more appropriate viewing/reading distance. Although all of the images presented in the Visual Resources section understate the scale of the landscape elements that would be experienced by viewers at the various KOPs (when viewed at a normal 18-inch viewing distance), it is recognized that the applicant has concluded that in all but two cases, the resulting visual impact would be positive (with one exception in which the impact would be neutral). It is staff's position that photographic and simulation exhibits must accurately convey as close as reasonable the actual visual experience available at each KOP, particularly in those cases where adverse visual impacts are likely.

Also, the Visual Resources section of the AFC (p. 6.13-70) states that "Transmission poles for the project would be 90 feet tall to allow for crane access underneath and are not shown in the simulations because their location has not been fully determined." The 90-foot transmission towers may constitute a substantial visual element of the proposed project and must be included in the simulations where their presence would be noticeable.

DATA REQUEST

157. Please re-scale and crop (as necessary) and provide five sets of 11" x 17" high-quality color photocopies of the existing setting photographs and simulations for KOPs 5, 6, and 20 in order to provide life-size scale images when viewed at a typical 18-inch viewing/reading distance.
158. In preparing revised simulations for KOPs 5, 6, and 20, please incorporate the 90-foot transmission towers.
159. Please provide a visual analysis (narrative) of the transmission towers as viewed from KOPs 5, 6, and 20.

BACKGROUND

Due to the sensitivity of views of Morro Rock, staff is concerned about the potential visual impact of visible daytime plumes on views of Morro Rock.

DATA REQUEST

160. Please provide five sets of 11"x17" high-quality color photocopies of the daytime photosimulation (at life-size scale based on an 18-inch view/reading distance) of

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

the proposed project with a reasonable maximum length plume (occurring 10% of the time) as viewed from KOP 15.

BACKGROUND

Due to the foreground proximity of the proposed project to views from Morro Strand State Beach, staff is concerned about the potential visual impact of visible daytime plumes on recreational users of the State Beach.

DATA REQUEST

161. Please provide five sets of 11" x 17" high-quality color photocopies of the daytime photosimulation (at life-size scale based on an 18-inch view/reading distance) of the proposed project with a reasonable maximum length plume (occurring 10% of the time) as viewed from KOP 5.

BACKGROUND

Viewer sensitivity is a key factor in staff's consideration of the existing visual setting and is typically characterized as high, moderate, or low for each Key Observation Point. The discussion of viewer sensitivity presented in the AFC (p. 6.13-33) states that all three types of viewers in the project area (residential, recreational, and mobile) are considered equal in terms of sensitivity but does not specify the level of viewer sensitivity.

DATA REQUEST

162. Please provide a determination of viewer sensitivity (often categorized as high, moderate, or low) and the basis for that determination for each Key Observation Point requiring further analysis (to be identified at the Data Request Workshop).

BACKGROUND

Visual quality is a key factor in staff's consideration of the existing visual setting and is typically characterized as high, moderate, or low for each Key Observation Point. The discussion of visual quality presented in the AFC (pp. 6.13-40 and 41) discusses visual quality by landscape unit and identifies a numerical rating for each unit. However, the discussion does not correlate the numerical rating to degree of visual quality (such as high, moderate, or low in the CEC methodology; or A, B, or C in the referenced BLM methodology).

DATA REQUEST

163. Please provide a determination of visual quality (often categorized as high, moderate or low) and the basis for that determination, as perceived from each Key Observation Point requiring further analysis (to be identified at the Data Request Workshop).

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

For each KOP, the AFC provides a table that presents percentage of visual change for several measurement categories. The calculated percentages represent the difference in the view between the existing power plant and the proposed project based on physical measurements of the existing photographs and simulations.

DATA REQUEST

164. For each KOP, please discuss the significance of the measured visual changes in terms of visual quality, overall visual contrast, project dominance, view impairment, or other appropriate visual parameter and identify the basis for those conclusions.
165. Please identify the thresholds of significance for the visual change measurements for each category of change (i.e. at what percentage does the change result in a significant improvement or deterioration in an important visual parameter such as visual quality, overall visual contrast, project dominance, or view impairment).
166. Please identify the basis for any stated visual change threshold of significance and include any sources in the existing literature on visual analysis.

BACKGROUND

The evaluation of construction-related impacts is a component of the Energy Commission staff's visual analysis of projects. The Visual Resources section of the AFC (p. 6.13-48) makes a brief reference to construction and demolition activities associated with the proposed project but does not address visual impacts resulting from construction activities, equipment, or personnel. Given the relatively long time frame for project construction and demolition activities (over five years), the visual impacts associated with construction/demolition must be addressed.

DATA REQUEST

167. Please describe the visual impacts associated with project construction and demolition. Discuss the probable visual impacts and their significance to specific receptors for specific phases of the project as identified in the Project Schedule of Activities (Figure 2-11).
168. Please provide five sets each of 11" x 17" high-quality color photocopies of daytime photosimulations (at life-size scale based on an 18-inch view/reading distance) of the proposed project during the following two phases of construction, as viewed from KOPs 5, 15, and 20:
 - a. as the proposed project is nearing maximum size and the construction cranes are still present; and
 - b. during existing plant demolition with cranes present (to be discussed during the Data Request Workshop).

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

The Visual Resources section of the AFC (p. 6.13-58) states that “Although [the lighthouse] proposal is not necessarily a part of this application, it is included for consideration because of community desires to retain some portion of the existing structure.” Retention of the southern stack as a lighthouse would be considered a substantial change to the proposed project. If the stack is to be retained, either as part of the proposed project or as an alternative for Commission consideration, a visual analysis of that scenario must be conducted.

DATA REQUEST

169. Please specify whether or not the lighthouse proposal is to be included as part of the proposed project or as an alternative for Commission consideration.
170. If the lighthouse proposal is to be included as part of the proposed project or as an alternative for Commission consideration, please provide a visual analysis commensurate to that conducted for the proposed project from KOPs 5, 6, 8, 15, and 20. The analysis must include recalculation of visual change, submittal of five sets of 11” x 17” high-quality color photocopies of photos of the existing setting and simulations of the proposed project at life-size scale based on a typical viewing/reading distance of 18 inches, as well as all other information analogous to that provided in the AFC by Key Observation Point, and as augmented by the Data Requests presented here.

BACKGROUND

The Visual Resources section of the AFC (pp. 6.13-95 through 102) identifies negative visual impacts occurring at KOP 5 (Morro Strand State Beach) and KOP 6 (Morro Dunes Trailer Park and Resort Campground). However, the impact discussion is lacking a determination of significance.

DATA REQUEST

171. Please identify impact significance for the negative visual impacts occurring at KOPs 5 and 6 and provide the basis for those determinations.

BACKGROUND

In the AFC discussion of KOP 16 (p. 6.13-140), the existing power plant stacks are described as being at an “intermediate distance away” at 1.16 miles. In the discussion of KOP 17 (p. 6.13-144), the view to the power plant is described as a “long-range” view at a distance of 1.17 miles.

DATA REQUEST

172. Please clarify the apparent inconsistency between the viewing distance characterization for KOP 16 and that for KOP 17.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

Section 6.13-5 Overall Visual Assessment (p. 6.13-177) states that “The increased berm height, additional vegetation screening, and landscaping would all contribute to reducing the negative effect from [KOPs 5 and 6].” Also, General Plan Program LU-40.16 and Local Coastal Plan Policy 5.21 (pp. 6.13-164 and 165) “require substantial landscaping and screening to mitigate the visual impacts of existing and future facilities; with particular emphasis on screening the facilities located between the power plant and Highway 1.” Given the importance of the proposed landscaping treatment in reducing the visual impact experienced at KOPs 5, 6, and 20, it is important for staff to see representations of plan implementation in order to gauge the effectiveness of the plan in minimizing negative visual impacts in the immediate project vicinity.

DATA REQUEST

173. Please provide five sets each of 11” x 17” high-quality color photocopies of photosimulations (at life-size scale based on an 18-inch viewing/reading distance) of the proposed landscaping and screening plan at maturity as viewed from KOPs 5, 6, and 20.
174. Please specify the time frame to landscaping maturity.
175. Please identify the assumptions made regarding growing conditions and potential growth rates for landscape species.
176. If the time to landscape maturity is greater than five years, please provide five sets each of 11” x 17” high-quality color photocopies of photosimulations (at life-size scale based on an 18-inch viewing/reading distance) of the proposed landscaping and screening plan at five years as viewed from KOPs 5, 6, and 20.

**Morro Bay Power Plant Project
Data Requests
(00-AFC-12)**

Technical Area: Waste Management

Author: Mike Ringer

BACKGROUND

Phase I and II Environmental Site Assessments (ESAs) have been performed for the Morrow Bay Power Plant site. AFC p. 6.14-1 states that the ESA's determination that no remediation of soil and ground water is required to protect human health was coordinated with appropriate regulatory agencies.

DATA REQUEST

177. Please submit five copies of each ESA.
178. Please list the regulatory agencies that reviewed or commented on the ESAs and provide copies of correspondence which indicates their approval of the conclusions that no remediation is necessary to protect human health or the environment.

BACKGROUND

Soil and water in several locations, containing more than specified amounts of total petroleum hydrocarbons, require remediation to comply with environmental regulations (AFC Figs. 6.14-1 and 6.14-2, Table 6.14-2).

DATA REQUEST

179. Please describe remedial issues IIa and IIb in Fig. 6.14-2 as they do not appear in Fig. 6.14-1 and are not mentioned in the text or Table 6.14-2.
180. Will any linear facilities, such as segments of natural gas pipeline, tie-ins to the electrical switchyard or cooling water intake and discharge systems, be constructed in areas requiring remediation?

BACKGROUND

The demolition phase of the project includes removal of aboveground oil storage tanks one through five. Demolition activities will generate hazardous and nonhazardous wastes.

DATA REQUEST

181. Please describe how the tanks will be cleaned prior to removal, the anticipated quantities and types of hazardous wastes that will be generated from cleaning, and how those wastes will be managed and disposed or recycled.
182. Please describe the management of tank pads if they are found to be contaminated with oil.

**Morrow Bay Power Plant Project
Data Requests
(00-AFC-12)**

BACKGROUND

Demolition of existing facilities will include exhaust stacks and removal of the metal cleaning waste ponds. These activities will generate hazardous and nonhazardous wastes.

DATA REQUEST

183. If testing shows material from the exhaust stacks to be hazardous, please describe how will it be managed. Will there be any onsite treatment?
184. Please list the estimated amounts and types of wastes expected to be generated from removal of the waste ponds. How are these wastes expected to be handled and disposed?

BACKGROUND

Demolition of offsite tanks may contribute to cumulative waste management impacts.

DATA REQUEST

185. Will metal from the tanks be recycled?