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SAN DIEGO, CALIFORNIA 92121
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Email: ram@ramcogen.net

RICHARD A. McCORMACK
President

May 18, 2001

Mr. Roger Johnson
California Energy Commission
Second Floor
1516 Ninth Street, MS-15
Sacramento, CA 95814

Subject: Addendum #1 to RAMCO Emergency Peaker Application for the Chula Vista II Generating Station

Dear Mr. Johnson:

This Addendum #1 provides supplemental information to complete RAMCO's Peaker Application for an Expedited 21 Day Emergency Permitting of the Chula Vista II Generating Station. The CEC has requested additional information/clarification for Sections 1.4, 1.14, 2.7, 5.4, 9.1, 12.3, 12.4, and 16.1 of the RAMCO Application submitted to the CEC on May 11, 2001.

An updated CEC Attachment A has been included for your reference.

Contacts for RAMCO concerning the application are:

Mr. Richard A. McCormack
President
RAMCO, Inc.
6362 Ferris Square, Suite C
San Diego, CA 92121
858.452.5963
858.453.0625 Fax

Mr. Dale E. Mesple
Project Developer
RAMCO, Inc.
1104 Rock Creek Way
Concord, CA 94521
925.672.1657
925.672.7504 FAX
925.366.4400 (Cell)

Mr. Roger Johnson

May 18, 2001

Page 2

Ms. Jan McFarland
Consultant
Fairhaven Institute
1100 Eleventh Street
Suite 311
Sacramento, CA 95814

916.447.7983

916.447.2940

443.336.1402(Cell)

Notices should be directed to all three contacts. We look forward to working with the California Energy Commission to reach a successful conclusion to this permit process.

Sincerely,

Tim Manton FOR DALE MESPLE

Dale E. Mesple
Project Manager

ATTACHMENT A – UPDATED FOR INCLUSION OF ADDENDUM #1**CALIFORNIA ENERGY COMMISSION****EMERGENCY SITING PROCESS APPLICATION CHECK LIST**

REQUIREMENT	YES/NO	PAGE IN APPLICATION
1 Project Description		
1.1 Project owner/operator (Name, title, address, phone)	YES	1-1
1.2 Overview of power plant and linear facilities	YES	1-1
1.3 Structure demensions (size and height), plan and profile	YES	1-2
1.4 Full size color photo of the site and rendering of proposed facility if available	YES	1-2 and Section 1.4 of Addendum #1
1.5 Maximum foundation depth, cut and fill quantities	YES	1-2
1.6 Conformance with California Building Code	YES	1-3
1.7 Proposed operation (hours per year)	YES	1-3
1.8 Expected on-line date	YES	1-3
1.9 Proposed duration of operation (years)	YES	1-4
1.10 Identify transmission interconnection facilities	YES	1-4
1.11 Transmission interconnection application	YES	1-4
1.12 “Down-stream” transmission facilities, if known	YES	1-4
1.13 Fuel interconnection facilities	YES	1-4
1.14 Fuel interconnection application	YES	1-4 and Section 1.14 of Addendum #1
1.15 Water requirements and treatment	YES	1-4
1.16 Water interconnection facilities (supply/discharge)	YES	1-5
1.17 Source and quality of water supply	YES	1-6
1.18 Water supply agreement/proof of water supply	YES	1-6
2 Site Description		
2.1 Site address (street, city, county)	YES	2-1
2.2 Assessor’s parcel number	YES	2-1
2.3 Names and addresses of all property owners within 500 feet of the project site or related facilities in both hard copy and electronic mail merge format.	YES	2-1
2.4 Existing site use	YES	2-1
2.5 Existing site characteristics (paved, graded, etc.)	YES	2-1
2.6 Layout of site (include plot plan)	YES	2-1
2.7 Zoning and general plan designations of site and linear facilities	YES	Text updated; see Section 2.7 of Addendum #1
2.8 Ownership of site (Name, address, phone)	YES	2-1
2.9 Status of site control	YES	2-1
2.9 Equipment laydown area – size and location	YES	2-1
3 Construction Description		
3.1 Construction schedule	YES	3-1
3.2 Workforce requirements (peak, average)	YES	3-1
4 Power Purchase Contract (DWR, ISO, other)		
4.1 Status of negotiations and expected signing date	YES	4-1
5 Air Emissions		
5.1 Nearest monitoring station (location, distance)	YES	5-1
5.2 Provide complete self certification air permit checklist	YES	5-1
5.3 Provide complete air permit application	YES	5-1
5.4 Status of air permit application with air district	YES	Text updated; see Section 5.4 of Addendum #1
5.5 Status of offsets and/or mitigation fees, as required	YES	5-1
6 Noise		
6.1 Local noise requirements	YES	6-1
6.2 Nearest sensitive receptor (type, distance)	YES	6-1
6.3 Project noise level at nearest property line	YES	6-1

REQUIREMENT	YES/NO	PAGE IN APPLICATION
6.4 Proposed mitigation if required	YES	6-1
7 Hazardous Materials		
7.1 Type and volume of hazardous materials on-site	YES	7-1
7.2 Storage facilities and containment	YES	7-1
8 Biological resources		
8.1 Legally protected species* and their habitat on site, adjacent to site and along right of way for linear facilities (<i>*threatened or endangered species on State or federal lists, State fully protected species</i>)	YES	8-1
8.2 Designated critical habitat on site or adjacent to site (wetlands, vernal pools, riparian habitat, preserves)	YES	8-1
8.4 Proposed mitigation as required	YES	8-1
9 Land Use		
9.1 Local land use restrictions (height, use, etc.)	YES	Text updated; see Section 9.1 of Addendum #1
9.2 Use of adjacent parcels (include map)	YES	9-1
9.3 Ownership of adjacent parcels – site and linears	YES	9-1
9.4 Demographics of census tract where project is located (most current available)	YES	9-1
10 Public Services		
10.1 Ability to serve letter from Fire District	YES	10-1
10.2 Nearest fire station	YES	10-1
11 Traffic and Transportation		
11.1 Level of Service (LOS) measurements on surrounding roads – a.m. and p.m. peaks	YES	11-1
11.2 Traffic Control Plan for roads during construction	YES	11-1
11.3 Traffic impact of linear facility construction	YES	11-1
11.4 Equipment transport route	YES	11-1
11.5 Parking requirements – workforce and equipment	YES	11-1
12 Soils and Water Resources		
12.1 Wastewater volume, quality, treatment	YES	12-1
12.2 Status of permits for wastewater discharge or draft permit (WDR/NPDES)	YES	12-2
12.3 Draft Erosion Prevention and Sedimentation Control Plan or Mitigation Strategy	YES	12-3 and Section 12.3 of Addendum #1
12.4 Spill Prevention/Water Quality Protection Plans	YES	12-3 and Section 12.4 of Addendum #1
13 Cultural Resources		
13.1 Identification of known historic/prehistoric sites	YES	13-1
13.2 Proposed mitigation if required	YES	13-1
13.3 Notification of Native Americans	YES	13-1
14 Paleontological Resources		
14.1 Identification of known paleontologic sites	YES	14-1
14.2 Proposed mitigation if required	YES	14-1
15 Visual resources		
15.1 Plan for landscaping and screening to meet local requirements	YES	15-1
15.2 Full size color photo of the site and rendering of proposed facility with any proposed visual mitigation if available	YES	15-1
16 Transmission System Engineering		
16.1 Conformance with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National Electric Code	YES	16-1

1.4 Full size color photo of site and rendering of proposed facility if available

This section includes supplemental information requested by the CEC. No text changes were made to Section 1.4 of the May 11, 2001 CEC Application.

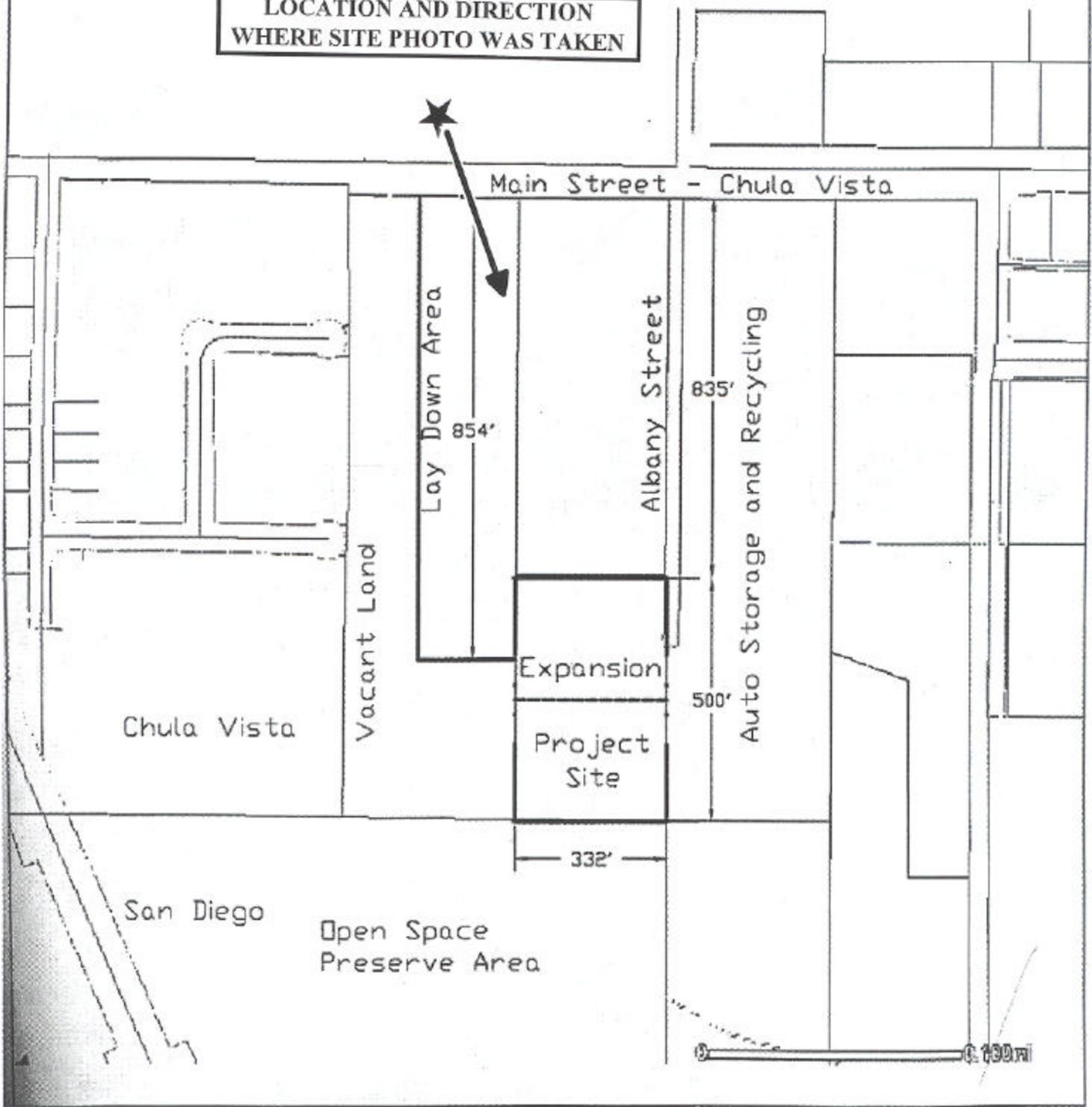
Photo of RAMCO Chula Vista Site ¹



¹ Please see attached map which indicates location where photo was taken;
Photo is from Main Street looking to the south;
Area in the foreground is the lay-down area

Chula Vista Peaker Generating Station Expansion

LOCATION AND DIRECTION WHERE SITE PHOTO WAS TAKEN



1.14 Fuel interconnection application

This section includes supplemental information requested by the CEC. No text changes were made to Section 1.14 of the May 11, 2001 CEC Application.



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May 15, 2001

Ms. Frances Mentzer
San Diego Gas & Electric
8315 Century Park Court
Suite 210
San Diego, CA 92123-1593

Re: Gas Service Request Chula Vista II

Dear Ms. Mentzer:

RAMCO, Inc. hereby requests gas service for its planned second Peaker facility a 3497 Main Street, Chula Vista, California. This site currently has one 44 MW peaker facility for which gas service already exists. RAMCO, Inc. has filed an expedited permit application with the California Energy Commission pursuant to the Governor's executive order. Mr. Alan Duci reviewed the supply adequacy for both units and reported adequate capacity in his April 24, 2001 letter to Mr. Bob Hoe, of Jaeger Engineering.

If you have any questions please call me.

Sincerely,

A handwritten signature in black ink that reads "Dale E. Mesple". The signature is written in a cursive, flowing style.

Dale E. Mesple
Project Manager

Copy: Mr. Steve Taylor, SDG&E

**SUBJECT: INFORMATION TO SUPPORT SUPPLEMENTAL SUBMITTAL
TO PERMITTING APPLICATION TO CALIFORNIA ENERGY COMMISSION
– FOR EXPANSION EMERGENCY POWER PLANT**

The following information is provided to support the SUPPLEMENTAL SUBMITTAL to the California Energy Commission (CEC) for additional information on the subject application:

Section 1.13 Fuel Interconnection Facilities - (Reference – letters from SDG&E, Alan Dusi, dated April 24, 2001, attached and letter FAX dated May 16, 2001) - The RAMCO CHULA VISTA EMERGENCY PERMIT COMPLETENESS CHECKLIST, CALIFORNIA ENERGY COMMISSION Requirement 1.14 Fuel interconnection application is checked “N” with the comment that “Referenced letter in Appendix H indicates that a new application is required for a second facility”.

Please refer to the letters dated April 24, 2001 and May 16, 2001 from SDG&E, Alan Dusi. As stated in the letter of April 24, 2001, the Fuel Gas interconnection for the second (expansion) unit was installed by SDG&E, as requested by RAMCO, when SDG&E installed the Fuel Gas interconnection for the existing unit. SDG&E, Alan Dusi, confirmed that the supply piping is satisfactory to provide the amount of gas required for the expansion unit.

The application referred to in SDG&E’s letter of April 24, 2001, is not an application for “Fuel interconnection”, but is an “application for service” and is not required by SDG&E until the customer needs the fuel gas.

SDG&E, Alan Dusi, has suggested that “RAMCO make Application for Gas Service once RAMCO receives the necessary permits to allow construction of the power plant”. Reference letter dated May 16, 2001, attached.



San Diego Gas & Electric
6875 Consolidated Way
San Diego, CA 92121-2602

A  Sempra Energy company

Mr. Robert J. Hoe
Jeager Engineering
3347 Industrial Ct., Sta J
San Diego, CA 92121

May 16, 2001

Subject: RAMCO Chula Vista Gas Main

Dear Mr. Hoe:

This letter is in response to your question concerning timing of the Application for Gas Service for a second 50 MW power plant at the RAMCO site at 3497 Main Street in Chula Vista.

As mentioned in my April 24, 2001 letter, an 8-inch gas main was installed to this site to serve the recently constructed 50 MW power plant. This same 8-inch gas main is capable of providing gas to a second 50 MW unit.

Application for Gas Service to this second unit is not required at this time. It is suggested that RAMCO make Application for Gas Service once RAMCO receives the necessary permits to allow construction of the power plant.

Please contact me if you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan E. Dusi".

Alan E. Dusi
Gas Engineering
858-547-2070



A Sempra Energy company

April 24, 2001

Mr. Robert J. Hoe
Jaeger Engineering
3347 Industrial Ct., Sta J
San Diego, CA 92121

Subject: RAMCO Chula Vista Gas Main

Dear Mr. Hoe:

This letter is in response to your question concerning gas supply for addition of a second 50 MW power plant at RAMCO's site at 3497 Main Street in Chula Vista. This power plant was originally developed by PG&E Dispersed Generating Co, LLC but later became known as the RAMCO Power Plant.

In March 2000, PG&E/RAMCO contacted SDG&E requesting expedited gas and electric interconnection for a 50 MW Peaker Unit at the Chula Vista site. SDG&E determine that a 6-inch gas main would meet the flow demand (750,000 SCFH) of the proposed power plant and other customers on this portion of Main Street. During design RAMCO requested that the gas main be increased to 8-inch to minimize pressure loss in the piping. An 8-inch gas main was installed with the increased cost to up size the line paid for by RAMCO.

In March 2001, RAMCO advised SDG&E that they were considering adding a second unit at the Chula Vista Power Plant site. This notice was received after the gas main had been installed but prior to being energized. At that time, SDG&E installed a connection point inside the new meter station to allow for installation of a second meter station.

SDG&E has determined that the 8-inch gas main can deliver the requested 1,586,000 SCFH to the RAMCO power plant site.

Should a second unit be installed at the Chula Vista site, RAMCO must contact SDG&E and make an application for gas service to the new unit.

Please contact me if you have questions or require additional information.

Sincerely,


Alan E. Dusi
Gas Engineering
858-547-2070

RAMCO
(858) 739-2217

2.7 Zoning and general plan designations of site and linear facilities

This section includes text changes that have been made for CEC Application Section 2.7. The attached text replaces the corresponding text in the May 11, 2001 Application.

2.7 Zoning and general plan designation of site and linear facilities

The General Plan designation of the site is Research/IL Limited Industrial and the Zoning designation is IL Limited Industrial. The site has an approved Conditional Use Permit from the City of Chula Vista Redevelopment Agency for the existing Chula Vista I facility.

The approved Conditional Use Permit for the Chula Vista I facility consists of the City of Chula Vista Resolution No. 1699 and a Site Plan. The City of Chula Vista Resolution No. 1699 is located in Appendix M of the CEC Application dated May 11, 2001. The Site Plan is located in Appendix B of the CEC Application dated May 11, 2001.

5.4 Status of air permit application with air district

This section includes text changes that have been made for CEC Application Section 5.4. The attached text replaces the corresponding text in the May 11, 2001 Application.

5.4 Status of air permit application with air district

The Authority To Construct Applications were initially filed on March 7, 2001, and March 15, 2001. A revised Authority To Construct Application dated May 11, 2001 was re-filed with the San Diego Air Pollution Control District on May 14, 2001.

9.1 Local land use restrictions (height, use, etc.)

This section includes text changes that have been made for CEC Application Section 9.1. The attached text replaces the corresponding text in the May 11, 2001 Application.

9.1 Local land use restrictions

The Chula Vista project site and the lands to the north, east, and west are designated for industrial use in the City's General Plan, and the Southwest Area Redevelopment Plan. Electrical generating plants are conditional uses (i.e. subject to the approval of a Conditional Use Permit) in the IL Limited Industrial Zone. The existing Chula Vista I peaker power plant facility Conditional Use Permit was approved in September 2000.

The Conditional Use Permit for the Chula Vista I facility consists of the City of Chula Vista Resolution No. 1699 and a Site Plan. The City of Chula Vista Resolution No. 1699 is located in Appendix M of the CEC Application dated May 11, 2001. The Site Plan is located in Appendix B of the CEC Application dated May 11, 2001.

Under the Conditional Use Permit for the IL Limited Industrial Zone, the height limit at the site is 45 feet. Also, the following minimum setbacks must be followed at the site: 20 feet for the front of property, and 15 feet for the exterior side yard. There are no setback requirements for the side and rear portions of the site.

Landscaping for the site follows requirements from the City of Chula Vista Landscaping Manual. The Landscaping Plan for the entire site has been approved by the City of Chula Vista. Fencing at the site was installed pursuant to the approved Conditional Use Permit site plan. The Zoning Ordinance specifies that fencing not more than six feet tall may be located on any part of an interior lot and to the rear of the required front and exterior side yard setbacks. In industrial zones, fences no more than nine feet tall may be allowed or required if it is determined by the zoning administrator that taller fences are necessary to protect public health, safety, and general welfare and would have no detrimental effect on the surrounding neighborhood.

12.3 Draft Erosion Prevention and Sedimentation Control Plan or Mitigation Strategy

This section includes supplemental information requested by the CEC. No text changes were made to Section 12.3 of the May 11, 2001 CEC Application.

**SUBJECT: INFORMATION TO SUPPORT SUPPLEMENTAL SUBMITTAL
TO PERMITTING APPLICATION TO CALIFORNIA ENERGY COMMISSION
– FOR EXPANSION EMERGENCY POWER PLANT**

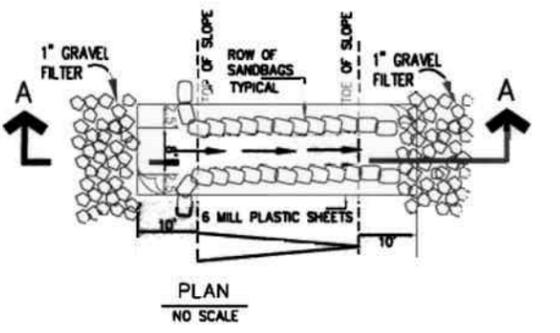
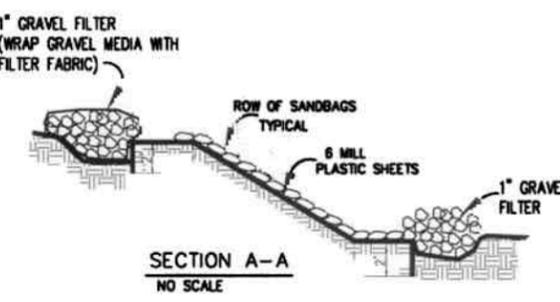
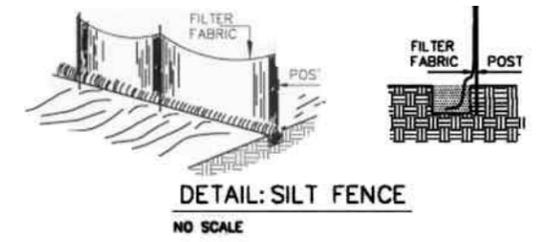
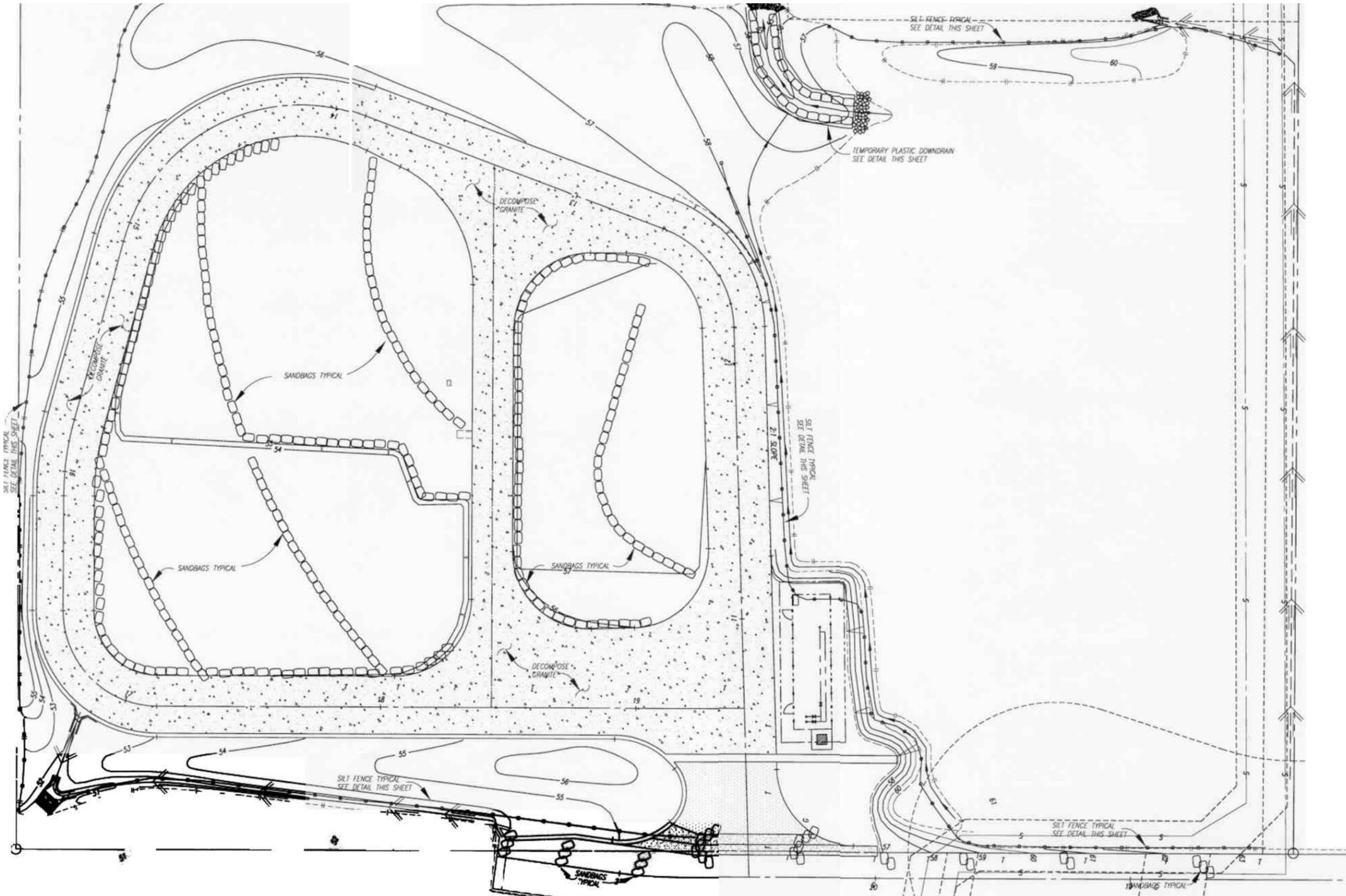
The following information is provided to support the SUPPLEMENTAL SUBMITTAL to the California Energy Commission (CEC) for additional information on the subject application:

Section 12.3 Draft Erosion Prevention and Sedimentation Control Plan or Mitigation Strategy - The proposed RAMCO Expansion Unit (Chula Vista II) is planned as the second unit to be sited at the RAMCO Chula Vista site. As such, RAMCO has already implemented a comprehensive, engineered Erosion Prevention and Sedimentation Control plan for the full site, which applies equally well to the proposed unit.

The grading plans, as implemented for the existing unit, were approved by the City of Chula Vista. The site has been graded to enhance the natural flow of surface water to the drainage areas. Graded swales are included and drainage ditches have been provided in accordance with San Diego Regional Standard, SDRS, D-75. Rip-rap energy dissipaters have been provided on the southeast corner and west side of the site.

As stated in the “Mitigated Negative Declaration” approved by the City of Chula Vista for this site, the “site (will) not be paved with impervious surfaces.” This will assist in the prevention of soil erosion and sediment control for this site.

During construction, erosion is mitigated by the use of several devices including: a Silt Fence, a one-inch Gravel Filter (wrap gravel media with filter fabric) and a Temporary Plastic Lined Downdrain. The “Erosion Control Plan” is presented in the attached drawing.



TEMPORARY PLASTIC LINED DOWNDRAIN
NO SCALE

NOTE:
ALL WORK WITHIN PUBLIC RIGHT OF WAY SHALL BE UNDER A SEPARATE PERMIT CONSTRUCTION PERMIT (BY OTHERS)

PG-657

DATE	DATE
(SIGNATURE)	(SIGNATURE)
(PRINTED NAME)	P.E. NO.
MY REGISTRATION EXPIRES	DISCIPLINE

PG-6

BRUNO B. CALLU R.C.E. C59412 DATE
EXPIRATION DATE: 12-31-2003

CROSBY MEAD BENTON ASSOCIATES Engineers • Planners • Surveyors
5650 El Camino Real, Suite 200
Carlsbad, California 92008
(760) 438-1210



CONSTRUCTION RECORD	REFERENCES	REVISIONS

Date	App'd	BENCH MARK	SCALE	Office	Designed by	Drawn by	Checked by	Submitted	Approved
		CITY OF CHULA VISTA BENCH MARK NO. 1540 LOCATION: MAIN ST. AND BANNER L&T IN B&SE	Horizontal 1"=20'	Field					

CITY OF CHULA VISTA	PUBLIC WORKS DEPARTMENT	Drawing No.
EROSION CONTROL PLAN FOR 3497 MAIN STREET, CHULA VISTA, CA		001158-05

12.4 Soil Prevention/Water Quality Protection Plans

This section includes supplemental information requested by the CEC. No text changes were made to Section 12.4 of the May 11, 2001 CEC Application.

In order to add the second turbine and generator (Chula Vista II) to the Chula Vista facility, several minor modifications will be made to the Storm Water Pollution Prevention Plan (SWPPP). Most of the changes are in the form of modified facility description and site map changes. Also, some of the sample points for the monitoring plan will be changed. All of the changes will occur to the SWPPP for Chula Vista II prior to operation of the modified facility. The following provides a section by section listing of changes to be made:

Section 1.0 Introduction

Modification will be made to the facility description to include the Chula Vista II unit. Similarly, modifications will be made to the drainage pattern description to include the Chula Vista II units. Any changes to the industrial activities at the site as a result of the addition of Chula Vista II will be considered in the development of revisions to the SWPPP.

2.0 SWPPP Planning and Site Maps

No changes will be made based on adding another turbine.

3.0 Description of Potential Pollutant Sources

The description will be updated, if necessary, to include a description of Chula Vista II equipment and operations consistent with the information presented, e.g., industrial processes on-site, hazardous materials handling and storage areas, etc.

Section 4.0 Non-Structural Best Management Practices (BMP's)

Procedures developed for Chula Vista I BMPs will be considered for the equipment and operations associated with Chula Vista II. The BMPs will be as consistent (as applicable) with current practices of Chula Vista I.

Section 5.0 Area Structural BMP's

Procedures developed for Chula Vista I BMPs will be considered for the equipment and operations associated with Chula Vista II. The BMPs will be as consistent (as applicable) with current practices of Chula Vista I.

Section 6.0 Storm Water Monitoring Plan

The monitoring plan will have the same overall objectives, however additional sample points may be determined based on the new facility layout.

STORM WATER GENERAL PERMIT

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

And

STORM WATER MONITORING PLAN

For:

PG&E Dispersed Generating Company, LLC
Chula Vista Peak Power Generating Plant
3497 Main Street, Chula Vista, CA

In Compliance With:

The Terms and Conditions of the General Permit
To Discharge Storm Water Associated
With Industrial Activity

Prepared With Assistance From:

Jacobs Consulting
5161 Ellsworth Street
San Diego, Ca 62110

May, 2001

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

TABLE OF CONTENTS

Section 1.0 Introduction

- 1.1 Facility Location and Description
- 1.2 Drainage Patter Description
- 1.3 The Storm Water General Permit
- 1.4 The Storm Water Pollution Prevention Plan (SWPPP)
- 1.5 The Storm Water Monitoring Program
- 1.6 SWPPP General Requirements

2.0 SWPPP Planning and Site Maps

- 2.1 Pollution Prevention Team and Other Requirements
- 2.2 Five Phase Process to SWPPP Development:
- 2.3 Site Maps

3.0 Description of Potential Pollutant Sources

- 3.1 Industrial Processes On-Site
- 3.2 Hazardous Material Handling and Storage Areas
- 3.3 Dust and Particulate Generating Activities
- 3.4 Significant Spills and Leaks
- 3.5 Significant Spills Since October 1, 1988
- 3.6 Non-Storm Water Discharges
- 3.7 Soil Erosion
- 3.8 List of Significant Materials

Section 4.0 Non-Structural Best Management Practices (BMP's)

- 4.1 Good Housekeeping
- 4.2 Preventive Maintenance
- 4.3 Spill and Leak Prevention and Response
- 4.4 Material Handling and Storage
- 4.5 Employee Training
- 5.6 Waste Handling/Recycling
- 4.7 Record-Keeping and Internal Reporting
- 4.8 Erosion Control and Site Stabilization
- 4.9 Maintenance and Inspection
- 4.10 Quality Assurance
- 4.11 Building Repairs and Construction Activities

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

TABLE OF CONTENTS (Cont.)

Section 5.0 Area Structural BMP's

- 5.1 Ammonia Tank Containment Area
- 5.2 Loading Platform Area
- 5.3 Transformer Foundation Area
- 5.4 Ammonia Sensor Alarms Area
- 5.5 SPCC Containment Pond Area

Section 6.0 Storm Water Monitoring Plan

- 6.1 Introduction and Objectives
- 6.2 Visual Inspection and Monitoring of Storm Water Flows
- 6.3 Sample Storm Water Discharge Locations
- 6.4 Storm Water Sampling Procedure:
- 6.5 Annual Inspection
- 6.6 Annual Comprehensive Site Compliance Evaluation
- 6.7 Record-Keeping
- 6.8 Annual Reporting

Section 7.0 - ATTACHMENTS

- A - Notice of Intent (NOI)
- B - Annual Report Form
- C – Form 1 - Sampling and Analysis Results (First and Second Event)
- D – Form 2 – Quarterly Visual Observations of Authorized Non-Storm Water Discharges
- E – Form 3 – Quarterly Visual Observations of Unauthorized Non-Storm Water Discharges
- F – Form 4 - Monthly Visual Observation of Storm Water Discharges
- G – Form 5 – Annual Comprehensive Site Compliance Evaluation

Section 8.0 – Annual Reports From Past Years

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

Section 1.0 Introduction

1.1 Facility Location and Description

PG&E Dispersed Generating Company, LLC (PG&E-DG) operates a power generation facility that falls under Standard Industrial Classification (SIC) Codes 3511 and 3612. The industrial facilities at this site are exposed to storm water. Therefore, the facility must be covered under the Storm Water General Permit. PG&E-DG filed a Notice of Intent on February 19, 2001 (See Attachments). The power plant is located at 3497 Main Street in the City of Chula Vista, CA. The property consists of one legal parcel (APN 629-062-04-00) that has no frontage on Main Street. The property is approximately 835 feet south of Main Street. A 20-foot wide private easement road provides access to the site. The road is partially paved and gravel. The entire site has been graded and some areas have been improved with pea gravel and coarse sand. Other areas are improved with equipment areas and structures. All storm water from the site drains to the south into the Otay River and to the west into a drainage swale that empties into the Otay River.

The properties to the north and east are occupied by auto storage and wrecking yards. The property to the west is currently vacant, but was previously used as a trailer storage yard. A single-family home residential area is located across the vacant lot to the west. The surrounding area south of Main Street is characterized by similar auto storage and dismantling activities. The Otay River Valley is located along the property's southern boundary.

The facility will be manned and will eventually be remotely operated by PG&E Generating control center personnel. PG& E Generating personnel or a local subcontractor routinely inspect, service, and maintain the facility. Operating and maintenance personnel visit the facility 2 to 3 times per week. Vehicular traffic is limited to operating and maintenance vehicles and deliveries of aqueous ammonia.

The facility is designed to be compliant with all governing local, State and Federal Law and Regulations, including but not limited to the Chula Vista industrial zone codes, Air Pollution Control permits, Department of Environmental Health permits, and local fire department requirements. Storm water pollution prevention is addressed through compliance with the General Permit and this SWPPP.

The facility consists of one natural gas fired combustion turbine generator. The air-cooled gas turbine (approximately 70 feet in length, 15 feet wide, and 11 feet high) is housed within an enclosure 100 feet in width, 80 feet long, and 25 feet high. The turbine is fitted with air pollution control equipment, noise suppression devices and exhaust stack. The Selective Catalytic Reduction (SCR) air pollution control equipment uses aqueous ammonia injection. The exhaust stack is approximately 15 feet wide, 20 feet long, and 45 feet high. The facility has state-of-the-art air pollution control equipment including Dry Low NOx burners. The facility is fueled solely by natural gas. Natural gas

PG&E – Dispersed Generating Company, LLC

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

is delivered via an existing 8-inch San Diego Gas and Electric gas transmission pipeline. Electricity output is transported over an existing San Diego Gas and Electric 69 kV transmission line feeding the Otay Substation. Water use is limited to on-site domestic use and inlet fogging. An on-site electrical substation will transform the electric output to 69,000 volts. The facility taps into the existing 69,000-volt line along the eastern edge of the site.

1.2 Drainage Patter Description

The only paved portions of the site are the concrete pads for turbine and equipment enclosures, ammonia unloading area, and the electrical substation. The paved area includes approximately 14,000 sq. ft. (8-percent of the 3.8-acre site). The Chula Vista site maintains no storm drains on site. Storm water discharges to storm conveyance systems, which originate upland from PG&E-DG and make their way to the Otay River at this facility.

The Federal Emergency Management Administration (FEMA) floodplain maps show the site as being within a 100-year floodplain. However, the maps were prepared prior to the filling of the site that occurred several years ago. The FEMA maps indicate the 100-year floodplain level at the site is 44 feet Above Mean Sea Level (AMSL). However, the site has been filled to a minimum elevation of 55 feet AMSL. Thus, the site is 10 to 11 feet above the 100-year floodplain level.

1.3 The Storm Water General Permit

The General Permit is a comprehensive permit that requires facility operators to:

1. Eliminate unauthorized non-storm water discharges
2. Develop and implement a Storm Water Pollution Prevention Plan (SWPPP)
3. Perform storm water monitoring of authorized non-storm water discharges
4. Prepare an annual report containing all records including visual inspection and storm water monitoring results

The General Permit prohibits discharges of material other than storm water (non-storm water discharges) that are not authorized by the General Permit. This PG&E-DG facility fits into the Light Industry category and falls under the General Permit based on its SIC Code.

1.4 The Storm Water Pollution Prevention Plan (SWPPP)

The General Permit requires development and implementation of an SWPPP emphasizing storm water pollution prevention Best Management Practices (BMP's). This approach provides the flexibility necessary to establish appropriate BMP's for different types of industrial activities and pollutant sources. The General Permit covers many different types of facilities, the Regional Water Quality Control Board (RWQCB) and the State Water Board recognize that there is no single best way of developing or organizing an SWPPP. However, the regulation identifies general requirements that are essential elements, which all facility operators must consider and address in their SWPPP.

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All facility operators must prepare, retain on site, and implement an SWPPP. The SWPPP has two major objectives:

- (1) To help identify the sources of pollution that affect the quality of industrial storm water discharges and authorized non-storm water discharges, and, .
- (2) To describe and ensure the implementation of BMP's to reduce or prevent pollutants in industrial storm water discharges and authorized non-storm water discharges.

Unauthorized non-storm water discharges can be generated from a wide variety of potential pollutant sources. They include waters from the rinsing or washing of vehicles, equipment, buildings, or pavement; materials that have been improperly disposed of or dumped, and spilled; or leaked materials. Unauthorized non-storm water discharges shall be eliminated at this site.

1.5 The Storm Water Monitoring Program

The General Permit requires development and implementation of a storm water monitoring program. The objectives of the monitoring program are to:

1. Demonstrate compliance with the General Permit
2. Aid in the implementation of the SWPPP
3. Measure the effectiveness of the BMP's in reducing or preventing pollutants in storm water discharges and authorized non-storm water discharges

All facility operators are required to:

1. Perform visual observations of storm water discharges and authorized storm water discharges.
2. Collect and analyze samples of storm water discharges. Analysis must include pH, total suspended solids (TSS), total organic carbon (TOC), specific conductance, toxic chemicals, and other pollutants, which are likely to be present in storm water.

1.6 SWPPP General Requirements

The SWPPP shall be retained on site and made available upon request of a representative of the San Diego RWQCB. The SWPPP shall be revised, updated and implemented prior to changes in industrial activities that:

1. may significantly increase the quantities of pollutants in storm water discharge,
2. cause a new area of industrial activity at the facility to be exposed to storm water, or
3. begin an industrial activity, which would introduce a new pollutant source at the facility.

The SWPPP shall be revised and implemented in a timely manner, but in no case more than 90 days after a facility operator determines that the SWPPP is in violation of any requirement(s) of this General Permit. Also, the SWPPP is considered a report that shall be available to the public by the RWQCB under Section 308(b) of the Clean Water Act.

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STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

2.0 SWPPP Planning and Site Maps

2.1 Pollution Prevention Team and Other Requirements

The General Permit requires that the SWPPP identify specific individuals to a storm water pollution prevention team responsible for developing and implementing the SWPPP. The SWPPP team will implement the plan, perform inspections, and conduct all monitoring program activities as required by the General Permit.

The PG&E-DG Regional Manager shall be primarily responsible for all SWPPP compliance activities. A committee shall be comprised of the following personnel to ensure compliance with the SWPPP:

Name	Title	SWPPP Title
	Regional Manager	SWPPP Program Manager
	Assistant Operations Manager	SWPPP Assistant
	Safety Official	SWPPP Training Coordinator

2.2 Five Phase Process to SWPPP Development and Implementation:

The SWPPP has many objectives that are focused on identifying and evaluating sources of pollutants associated with industrial activities that may affect the quality of storm water discharges from the PG&E-DG Chula Vista facility. One of the central themes is identifying and implementing site-specific best management practices (BMP's) to reduce or prevent pollutants in storm water discharges. BMP's may include a variety of pollution prevention procedures or other structural pollution control measures. They are generally categorized as Non-Structural BMP's (activity schedules, prohibitions of practices, maintenance procedures, and other low-cost measures) and as Structural BMP's (treatment measures, run-off controls, over-head coverage.) To achieve the objectives of the SWPPP, PG&E-DG uses a five-phase process for development and implementation displayed in the flow-chart on the following page:

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**FIVE PHASES FOR DEVELOPING AND IMPLEMENTING INDUSTRIAL
STORM WATER POLLUTION PREVENTION PLANS**

1 - PLANNING AND ORGANIZATION

Form Pollution Prevention Team
Review other plans (Business Plan and Risk Management Plan)

2 - ASSESSMENT PHASE

Develop Site Maps Identifying Drainage Flow Patterns
Identify Potential Pollutant Sources
Inventory of Materials and Chemicals
List All Significant Spills and Leaks
Identify and Eliminate All Non-Storm Water Discharges
Assess pollutant risks

3 - BEST MANAGEMENT PRACTICES IDENTIFICATION PHASE

Implement Non-Structural BMP's
Design, Install and Utilize Structural BMP's
Select Activity, Procedural, and Other Site-Specific BMP's

4 - IMPLEMENTATION PHASE

Train Employees
Implement BMP's
Conduct Record-Keeping and All Required Reporting

5 - EVALUATION / MONITORING

Conduct Annual Site Evaluations
Review Monitoring Information For BMP Improvement
Evaluate BMP's For Effectiveness
Review and Revise the SWPPP As Needed

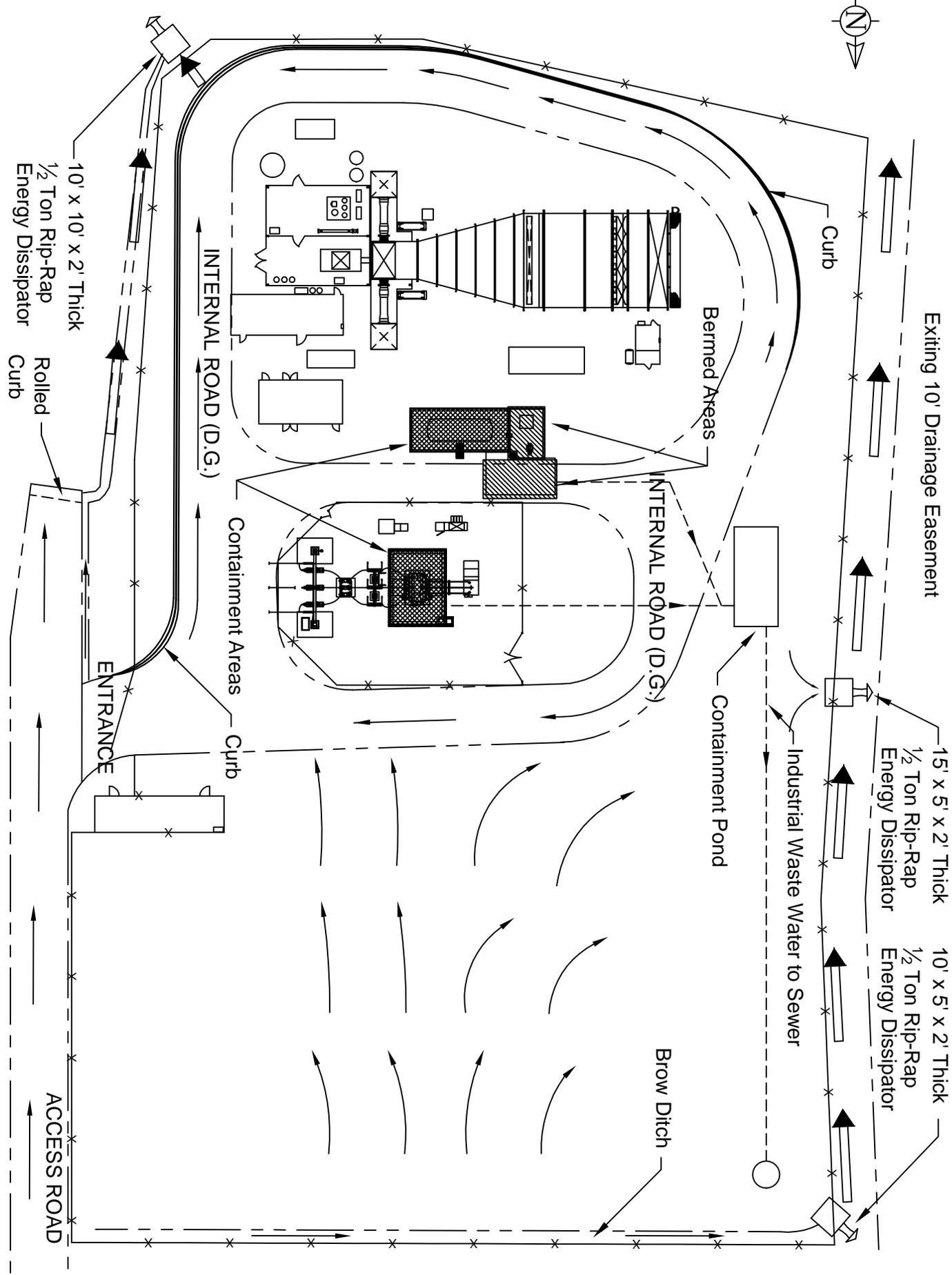
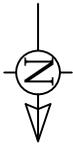
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2.3 Site Maps

This SWPPP includes site map to illustrate the facility. Site maps are essential for understanding the facility and surroundings. The site maps are clear and understandable. The following information is included on the site map:

- The facility boundaries
- The outline of all storm water drainage areas within the facility boundaries
- Portions of the drainage area impacted by run-on from surrounding areas
- Direction of flow of each drainage area
- On-site surface water bodies and areas of soil erosion
- Identify nearby water bodies (such as the Otay River) and municipal storm drain inlets where the facility's storm water discharges
- The location of the storm water collection and conveyance system and associated points of discharge, and direction of flow.
- Structural control measures that affect storm water discharges, run-off and run-on (examples of structural control measures are catch basins, berms, detention ponds, secondary containment, oil/water separators, diversion barriers, etc.)
- Identify all impervious areas of the facility, including paved areas, buildings, covered storage areas, or other roofed structures.
- Locations where materials are directly exposed to precipitation
- Identify areas of industrial activity (i.e., storage areas and storage tanks, shipping and receiving areas, fueling areas, vehicle and equipment storage/maintenance areas, material handling and processing areas, waste treatment and disposal areas, dust or particulate generating areas, cleaning and rinsing areas, and other areas of industrial activity which are potential pollutant sources)

Site Maps are Provided on the Following Page:



STORM WATER PLAN

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3.0 Description of Potential Pollutant Sources

Included in this section of the SWPPP is a narrative description of the industrial activities at the Chula Vista site. There are very few potential pollutants utilized and/or generated in the processes and activities at the site that could potentially affect the storm water quality. Most of the site consists of roadways, rooftops, and machinery space. The following items describe the facility's industrial activities and potential pollutant sources.

3.1 Industrial Processes On-Site

Gas Turbine - The facility consists of one natural gas fired combustion turbine and associated generator. The air-cooled gas turbine (approximately 70 feet in length, 15 feet wide and 11 feet high) is housed within an enclosure 100 feet in width, 80 feet long and 25 feet high. The turbine is fitted with air pollution control equipment, noise suppression devices and an exhaust stack. The Selective Catalytic Reduction (SCR) air pollution control equipment uses aqueous ammonia injection and is approximately 70 feet in length, 35 feet wide, and 40 feet high. The exhaust stack is approximately 15 feet wide, 20 feet long, and 45 feet high.

Electrical Substation - The facility taps into the existing 69,000-volt line along the eastern edge of the site. An on-site electrical substation will transform the electric output to 69,000 volts to match the existing line. The electrical substation has transformers that contain cooling oils (non-PCB). Approximately 5,200 gallons of insulation oil will be contained in the transformers. The entire foundation where the substation is mounted has a secondary containment system that would catch oil if a leak were to occur. At a minimum, the secondary containment volume is large enough to contain 110% of the total oil contained.

Aqueous Ammonia System - PG&E-DG uses aqueous ammonia to control emissions of oxides of nitrogen (NO_x) from the natural gas turbine exhaust at the Chula Vista power generation facility. The aqueous ammonia is stored in a single 12,000-gallon tank. The aqueous ammonia is pumped to a Selective Catalytic Reduction (SCR) process where it is released into the exhaust stream to reduce NO_x emissions. Thus, aqueous ammonia usage is essential to complying with applicable air quality standards and regulations to provide adequate public health protection from NO_x emissions. The aqueous ammonia system will only be pressurized when the turbine operates, which is estimated to be less than 5,000 hours per year. The storage tank will have a slight positive pressure during most times of operation..

Ammonia at normal temperatures and pressures is a colorless gas made up of one part nitrogen and three parts hydrogen (NH₃). It is lighter than air and has a sharp pungent odor that serves as a warning of its presence. Although ammonia is a relatively toxic substance, it is not a cumulative poison. It is highly soluble in water and forms a solution known as ammonium hydroxide, which is commonly used as a household cleaner. The Department of Transportation (DOT) classifies aqueous ammonia as a nonflammable liquid.

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The aqueous ammonia tank is located on a large foundation that has full secondary containment with approximately 150% capacity of the 12,000-gallon storage tank. Therefore, if the tank were to fail, the entire contents would be contained and there would be no possibility for discharge into the storm drain system or directly into the Otay River.

3.2 Hazardous Material Handling and Storage Areas

Aqueous Ammonia - Shipments of aqueous ammonia arrive at the facility as needed. There are very specific procedures in place to ensure that spills and accidents do not occur. Also, there is a loading pad designed to capture and contain the ammonia if a spill were to occur during offloading. Therefore, the potential for aqueous ammonia to discharge to the Otay River is virtually eliminated.

Transformer Oils - Transformer oils are encased in the transformers when they arrive. The oils will be changed every couple of years. The area has secondary containment and discharges to the storm water system are highly unlikely.

Miscellaneous Maintenance Fluids - Maintenance personnel will utilize small quantities of hazardous materials to maintain the facility and keep equipment in good operation. These materials include lubricants, solvents, and paints. These materials will be stored in a hazardous materials storage cabinet on site. The maintenance personnel will be trained in storm water pollution prevention and hazardous material management. This will ensure that hazardous materials used on-site do not discharge with storm water.

3.3 Dust and Particulate Generating Activities

PG&E-DG has very few industrial activities that generate dust or particulate that may be deposited within the facility's boundaries. The majority of particulate generated on-site will be from truck traffic and miscellaneous maintenance functions (i.e. welding and painting). The emission from the turbine will be negligible with respect to storm water contamination.

3.4 Significant Spills and Leaks

PG&E-DG is commissioning at this location in May 2001. PG&E-DG has no knowledge or relation to any materials spilled or leaked in significant quantities into storm water discharges or non-storm water discharges since April 17, 1994.

3.5 Significant Spills Since October 1, 1988

Similarly, PG&E-DG has no knowledge of any significant materials having been spilled, leaked, or otherwise accidentally released in significant quantities to storm drains after October 1, 1988.

3.6 Non-Storm Water Discharges

PG&E-DG will have zero non-storm water discharges to the storm drain system or the Otay River. The plant is a new installation and efforts are focused on having no non-storm water discharges to the Otay River.

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3.7 Soil Erosion

Soil erosion will be managed at this facility. The facility is designed to manage storm water flows with minimal erosion. The facility has been designed to ensure that storm water flows are controlled. A dissipater is installed where the storm water flows into the Otay River Valley. Similarly, berms, grading, and vegetation are used extensively to ensure that storm water flows are controlled and erosion is minimized.

3.8 List of Significant Materials

PG&E-DG has very few significant materials handled and stored at the site. Essentially, the following substances are the vast majority of potential pollutants on-site:

- Aqueous Ammonia (<19% by weight)
- Transformer Oil (non-PCB)
- Other lubricants
- Miscellaneous paints and maintenance materials

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STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

Section 4.0 Non-Structural Best Management Practices (BMP's)

Non-Structural and General BMP's

PG&E-DG has implemented several Non-Structural Storm Water Best Management Practices (BMP's). The BMP's have been developed and implemented to reduce or prevent pollutants in storm water discharges. Non-Structural and general BMP's consist of processes, prohibitions, procedures, signs, schedule of activities, and other Non-Structural improvements that minimize the potential for pollutants contacting storm water. They are considered to be low technology and cost-effective measures to prevent storm water pollution. PG&E-DG has considered all possible Non-Structural BMP options before considering Structural BMP's, which are discussed and outlined in Section 5.0. The Non-Structural BMP's (NS-BMP's) implemented at this site are presented in Table Format and include the following subject matters:

- 4.1 Good Housekeeping**
- 4.2 Preventive Maintenance**
- 4.3 Spill and Leak Prevention and Response**
- 4.4 Material Handling and Storage**
- 4.5 Employee Training**
- 4.6 Waste Handling/Recycling**
- 4.7 Record-Keeping and Internal Reporting**
- 4.8 Erosion Control and Site Stabilization**
- 4.9 Maintenance and Inspection**
- 4.10 Quality Assurance**
- 4.11 Building Repairs and Construction Activities**

4.1 NS-BMP #1	Non-Structural BMP
Good Housekeeping	This consists of practical procedures to maintain a clean and orderly site, to separate water from pollutants, and to separate pollutants from water. Procedures in development.

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4.2 NS-BMP #2	Non-Structural BMP
Preventive Maintenance	<p>This includes the regular inspection and maintenance, including testing, of structural controls (catch basins, oil/water separators, etc.) as well as other site equipment and systems.</p> <p>Procedures in development.</p>

4.3 NS-BMP #3	Non-Structural BMP
Material Handling and Storage	<p>This includes procedures to minimize the potential for spills and leaks and to minimize exposure of significant materials to storm water.</p> <p>Procedures in development.</p>

4.4 NS-BMP #4	Non-Structural BMP
Spill and Leak Prevention and Response	<p>This includes containment, control, and cleanup procedures. Specific procedures for preventing spills and responding to small and large spills are described in the Business Plan and facility Risk Management Plan (RMP). Handling of hazardous materials is performed in a manner that minimizes potential for spills and leaks. Consequently, potential for contact between pollutants and storm water is minimized.</p> <p>Procedures in development.</p>

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4.5 NS-BMP #5	Non-Structural BMP
On-Site Personnel Training	<p>This includes training of all on-site personnel whose actions or lack thereof could result in the discharge of pollutants. Such personnel include employees of PG&E-DG as well as other on-site personnel, subcontractors, contractors, suppliers, and others. This also includes training of personnel who are responsible for:</p> <ol style="list-style-type: none">1) Implementing the BMP Program,2) Conducting inspections, sampling, and visual observations, and3) Managing the site drainage system. <p>Training should address topics such as good housekeeping, material handling and storage, spill response, and actions necessary to implement all BMP's identified in this SWPPP. Records shall be maintained of all training sessions.</p> <p>Procedures in development.</p> <p>All employees have access to the Facility Safety Manual and SWPP Plan (as well as other operating procedure documents such as the Health and Safety Plan and Business Plan). Initial employee training at the facility includes a course that provides training in the new employees' specific operating area. The employee is trained in proper operating and maintenance procedures. Records of all training activities will be maintained.</p>

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4.6 NS-BMP #6	Non-Structural BMP
Waste Handling / Recycling	<p>This includes procedures and processes to handle, store, recycle, and dispose of waste materials. Proper disposal of wastes, and recycle when possible will eliminate illegal discharges. Reduce, reuse and recycle hazardous and non-hazardous wastes when possible.</p> <p>Procedures in development.</p> <p>The following are some resources used for Disposal and Recycling of wastes:</p> <p style="text-align: center;"><u>RECYCLING:</u> <i>NON-HAZARDOUS WASTE RECYCLING:</i> County Recycling Hotline: (619) 467-0903 or (800) 237-2583 <i>HAZARDOUS WASTE RECYCLING:</i> Call the State Department of Toxic Substances Control to get a copy of the "Directory of Industrial Recyclers and Listing of Hazardous Wastes Available for Recycling": (916) 323-6042</p> <p style="text-align: center;"><u>DISPOSAL:</u> <i>NON-HAZARDOUS WASTE DISPOSAL:</i> County Landfills (Allied Systems, Inc.): (619) 278-6061 City Landfill (Miramar) Information: (619) 573-1418 or (619) 573-1420 <i>HAZARDOUS WASTE DISPOSAL:</i> County Hazardous Materials Duty Specialist: (619) 338-2231</p> <p style="text-align: center;"><u>EXCHANGE PROGRAMS:</u> Call the California Integrated Waste Management Board to get a copy of the "California Materials Exchange (CALMAX) Catalog": (916) 255-2369</p>

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4.7 NS-BMP #7	Non-Structural BMP
Record-Keeping and Internal Reporting	<p>This includes procedures to ensure that all records of inspections, spills, maintenance activities, corrective actions, visual observations, etc., are developed, retained, and provided, as necessary, to the appropriate personnel.</p> <p>Records and plans are maintained on-site. Other records maintained in this area include:</p> <ul style="list-style-type: none">• Hazardous Materials Business Plan• The facility's Safety Procedures Manual• Risk Management Plan (RMP) Technical Document• Material Safety Data Sheets (MSDS)• Inspection Records• PG&E-DG Training Records

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4.8 NS-BMP #8	Non-Structural BMP
Erosion Control and Ground Maintenance	<p>This includes all sediment and erosion control activities. This may include the planting and maintenance of vegetation, diversion of run-on and runoff, placement of sandbags, silt screens, or other sediment and erosion control devices, etc.</p> <p>The existing on-site drainage pattern is to the southern property line and the Otay River and to the west where runoff flows from the property into the Otay River. The existing drainage swale is part of the City of Chula Vista storm drain system that conveys runoff from north of Main Street to the Otay River.</p> <p>The grading directs surface runoff to a catch basin with a built-in filtration system in the southwest corner of the site. An 18-inch RCP storm drain conveys surface runoff to a headwall and energy dissipater located in an existing drainage swale immediately southwest of the project site.</p> <p>Other General Procedures in development.</p> <p>Landscape maintenance is performed regularly. Landscaped areas are watered when necessary, using minimum amounts of water to maintain vegetation. Use of fertilizers and pesticides is generally not necessary. If these chemicals are used, manufacturers' Instructions are followed, and the minimum quantity needed to do the job is used. All chemicals used for vegetation are applied by a landscape maintenance contractor and are not stored on-site.</p>

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4.9 NS-BMP #9	Non-Structural BMP
Maintenance and Inspections	<p>The storm drain system is regularly inspected and maintained. All conveyance systems are inspected monthly during the dry season, and weekly and after storms during the rainy season. Any obstructions of debris observed during inspection are removed promptly. Spilled or leaked materials that could be transported by storm water are also removed, and the source of the spill or leak is eliminated. Accumulated sediments, leaves, and other debris are removed from the catch basins monthly (and before ft rains).</p> <p>This BMP includes an inspection schedule of all potential pollutant sources. Tracking and follow-up procedures shall be implemented to ensure adequate corrective actions are taken and adequate BMP's are developed and implemented.</p> <p>Equipment maintenance schedules are designed to ensure that all associated equipment is operating correctly, minimizing potential spills, leaks and other conditions. Schedules for equipment maintenance are set according to specifications of the equipment's manufacturers. Additional maintenance is conducted as needed when equipment malfunctions are observed. Outdoor equipment maintenance includes maintenance of the surface (usually the concrete pad) beneath the equipment. A drip pan or catchment is used whenever maintenance procedures may result in spills or drips. Vehicle maintenance is performed on a regular schedule and in case of vehicle malfunction.</p> <p>Procedures in development.</p>

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4.10 NS-BMP #10	Non-Structural BMP
Quality Assurance	<p>This includes procedures to ensure that the SWPPP is adequate and that all elements of the SWPPP and Monitoring and Reporting Program are completely implemented.</p> <p>Procedures in development.</p>

4.11 NS-BMP #11	Non-Structural BMP
Building Repairs and Construction Activities	<p>Areas where building repair, remodeling and minor construction are conducted can contribute contaminants to runoff when measure have not been taken to prevent discharges. During construction and repair activities, activities will include soil erosion control techniques, minimizing overspray of a painting operations, proper storage and disposal of waste materials, good housekeeping practices and employee related training about BMPs to prevent Storm Water Pollution.</p>

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Section 5.0 Area Structural BMP's

Structural BMP's are the most effective type of pollution prevention measures that have been considered and implemented at this site. Structural BMP's generally consist of structural devices that reduce or prevent pollutants in storm water discharges. Below is an example list of structural BMP's that were considered at this facility:

Area Structural BMP's	
Overhead Coverage	This includes structures that provide coverage over or enclosure of materials, work areas, and potential pollutant sources.
Retention Ponds	This includes basins, ponds, surface impoundment's, bermed areas, etc., which prevent pollutants from being discharged from the site.
Control Devices	This includes berms or other devices that channel or route water away from potential pollutant sources.
Secondary Containment Structures	This includes structures around storage tanks and other areas for the purpose of containing leaks and spills.
Treatment	This includes inlet controls, infiltration devices, oil/water separators, detention ponds, vegetative swales, etc., which remove pollutants from water before it discharged.

At the Chula Vista Facility, the Structural BMP's are divided into areas where they are applied. The areas may have one or more structural BMP's in place. Also, most of the areas have non-structural BMP's to enhance the Area Structural BMP's.

Each Area Structural BMP is divided into a separate description for simplicity. There is some overlap between Areas, Non-Structural BMP's and Structural BMP's, which tends to create support and continuity. Also, the tabular form of the BMP's provides an excellent training format for facility personnel. The Area Structural BMP's include the following:

- 5.1 Ammonia Tank Containment Area**
- 5.2 Loading Platform Area**
- 5.3 Transformer Foundation Area**
- 5.4 Ammonia Sensor Alarms Area**
- 5.5 SPCC Containment Pond Area**

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5.1 Structural BMP #1 - Ammonia Tank Containment

The aqueous ammonia is stored in a single 12,000-gallon tank. The aqueous ammonia is pumped to a Selective Catalytic Reduction (SCR) process where it is released into the exhaust stream to reduce NOx emissions. The ammonia tank is located on a large foundation that has full secondary containment with approximately 150% capacity of the 12,000 gallon storage tank. Therefore, if the tank were to fail, the entire contents could be contained and there would be no possibility for discharge into the storm drain system or directly into the Otay River.

Area	Activities	Potential Sources	Pollutant	Best Management Practices
1) Ammonia Tank Containment	Ammonia Storage	Spills and leaks Leaking or damaged tanks Storm water flows Berm failure Reactions with incompatible materials	Ammonia	<ul style="list-style-type: none"> • The tank is surrounded by a berm that provides sufficient volume to contain possible spills. • There are no material compatibility issues with the tank, its contents or the containment system. • The secondary containment area is free of cracks and gaps, and the surface is sufficiently impervious to contain leaks and spills until they can be cleaned up. • The surface area inside containment areas is sloped towards a low point that is used to collect spills and rainwater. • Rainwater is collected and a manual valve allows the rainwater to be released to the containment pond. • The area is fitted with ammonia sensors and alarms that immediately notify PG&E-DG of a spill or release.

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5.2 Structural BMP #2 - Unloading Platform Area

The unloading platform area is a concrete pad that is approximately 35 feet long and 25 feet wide. The pad provides a safe area for shipments of aqueous ammonia. Tank trucks with approximately 6,000 gallons of aqueous ammonia park on the pad to perform the unloading operation. Two highly trained individuals perform the unloading process following very specific procedures, which minimizes the likelihood for accidents and spills during unloading. The unloading pad itself is designed to control spills if such an event were to occur. The entire unloading pad is sloped to a sump, which provides containment in the event of a spill. Storm water from the unloading platform will be pumped to the ammonia tank secondary containment area and later discharged to the industrial sewer. This eliminates the possibility of storm water discharges from the ammonia unloading area.

Area	Activities	Potential Sources	Pollutant	Best Management Practices
2) Loading Platform Area	Loading and Unloading of Aqueous Ammonia	Spills and Leaks Line Break Pump failure Human Error Storm water flows Reactions with incompatible materials	Aqueous Ammonia Truck Leaks	<ul style="list-style-type: none"> • The area is constructed of a large concrete pad that is sloped to a collection sump. The slope and sump are available to ensure directional control of aqueous ammonia in the event of a spill or line break. • The storage and transfer of aqueous ammonia is performed in compliance with local State and Federal environmental, safety and fire codes. Workers are trained and a procedure is in place. • The area is free of cracks and gaps, and the surface is sufficiently impervious to contain leaks and spills until they can be cleaned up. • There are no incompatible material issues with aqueous ammonia.

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5.3 Structural BMP #3 - Transformer Foundation Area

This site has an electrical substation on site. The substation transforms the electricity generated into the electric output to 69,000 volts. The facility taps into the existing 69,000-volt line along the eastern edge of the site. The transformers are located on a 23' X 21' foundation. The electrical substation has transformers that contain cooling oils (non-PCB). Approximately 5,200 gallons of insulation oil is contained in the transformers. The entire foundation where the substation is mounted has an integrated secondary containment system that would catch oil if a leak were to occur. At a minimum, the secondary containment volume is large enough to contain 110% of the total oil contained. Transformer oils are encased in the transformers when they arrive. The oils will be changed every couple of years. Accumulated storm water in the secondary containment area is directed to a sump and is discharged to the industrial sewer. The area has secondary containment and discharges to the storm water system are highly unlikely.

Area	Activities	Pollutant Sources	Pollutant	Best Management Practices
3) Transformer Foundation Area	None	Spills and Leaks Leaking or damaged tanks Storm water flows Berm failure	Insulation Oil (Non-PCB)	<ul style="list-style-type: none"> • The area is surrounded by a curb that provides sufficient volume to contain all possible spills. • The storage of toxic, corrosive, reactive or ignitable materials and wastes at PG&E-DG complies with all local and state fire codes. • The area is free of cracks and gaps, and the surface is sufficiently impervious to contain leaks and spills until they can be cleaned up. • The surface area inside containment areas is sloped towards a low point which is be used to collect accumulated rainwater.

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STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

5.4 Structural BMP #4 - Ammonia Sensor Alarms Area

The installation of Ammonia sensors is a California Accident Release Program (CalARP) requirement. This requirement will aid in the prevention and minimization of pollution if the ammonia system integrity is compromised. There are six ammonia sensors placed around the ammonia tank and the injection grid. When triggered, these sensors will set off a series of alarms and procedures to shut the system down and stop the release. The ammonia system lines that are not in a secondary containment area are positioned over gravel and are over 75 feet from the nearest storm water discharge point. The combination of a quick system shutdown and the distance to the nearest storm water discharge point makes it nearly impossible for an ammonia discharge to the Otay River.

Area	Activities	Potential Sources	Pollutant	Best Management Practices
4) Ammonia Sensor Alarms	Closed Loop System	Spills and Leaks Leaking or damaged tanks	Ammonia	<ul style="list-style-type: none"> • The use of Aqueous Ammonia is in compliance with the California Accident Release Program (CalARP) as well as with all local and federal codes. Information on accident prevention and response are contained within the facility Risk Management Plan (RMP) and the facility Hazardous Materials Business Plan. • Personnel are trained on the Business Plan and the RMP as well as this SWPPP. • Alarms are triggered to ensure that the ammonia system is shut down as soon as a release occurs (see RMP for details). A quick shutdown will ensure that aqueous ammonia does not discharge to the Otay River.

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

5.5 Structural BMP #5 - SPCC Containment Pond Area

The facility has three major containment areas that discharge to a Spill Prevention Control and Counter Measure (SPCC) containment pond. The main function of the SPCC Pond is to minimize the potential release of non-storm water materials (transformer oil, aqueous ammonia) into the Otay River. The three areas that are connected to the SPCC Pond are the previously mentioned aqueous ammonia tank secondary containment area, the unloading platform area and the electrical substation secondary containment area. After a storm event has occurred and water has built up in the containment areas, this water will be discharged manually. The process is to physically view the water in each containment area and then discharge it to the secondary containment pond. Once the rainwater is in the pond, it is visually inspected and a sample may be pulled. This water is then pumped to the industrial sewer under permit conditions as set by the Industrial User Discharge Permit. This structural BMP eliminates the discharge of potentially contamination rainwater form secondary containment areas from being discharged to the Otay River.

Area	Activities	Potential Sources	Pollutant	Best Management Practices
5) SPCC Containment Pond Area	Various	Spills and Leaks Leaking or damaged tanks in secondary containment areas Storm water flows	Ammonia Oils, Greases, and other minor sources	<ul style="list-style-type: none"> Through pumps and a specialized system, no storm water discharges are associated with secondary containment areas at this facility. All potentially contaminated storm water from secondary containment areas is directed to the industrial sewer.

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

Section 6.0 – Storm Water Monitoring Plan

6.1 Introduction and Objectives

This Storm Water Monitoring Plan has been prepared in accordance with Section B of the Storm Water General Permit. The focus of this plan is to ensure that runoff discharges are in compliance with discharge standards and that management practices in place that effectively control pollutants from entering the storm drainage system.

The objectives of the Storm Water Monitoring Program are to:

- Ensure that storm water discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in this General Permit
- Ensure practices at the facility to reduce or prevent pollutants in storm water discharges
- Aid in the implementation and revision of the SWPPP
- Measure the effectiveness of best management practices (BMP's) to prevent and reduce pollutants in storm water discharges.

6.2 Visual Inspection and Monitoring of Storm Water Flows

PG&E-DG shall collect storm water samples during the first hour of discharge from the *first storm event of the wet season*, (i.e. first storm after October 1st 2001) and at least one other storm event in the wet season. All storm water discharge locations shall be sampled. Sampling of stored or contained storm water shall occur at the time the stored or contained storm water is released. If PG&E-DG does not collect samples from the first storm event of the wet season, two other storm events during the wet season shall be collected. Also, an explanation why the first storm event was not sampled, shall be provided in the *Annual Report*.

The samples shall be analyzed for:

1. Total suspended solids (TSS) pH, specific conductance, and total organic carbon (TOC). Oil and grease (O&G) may be substituted for TOC; and
2. Toxic chemicals and other pollutants that are likely to be present in storm water discharges in significant quantities. There are no known toxic chemicals present at this facility that should be detected in the storm water.
3. There are no additional chemicals to be analyzed based on the Standard Industrial Classification (SIC) Code.

6.3 Sample Storm Water Discharge Locations

PG&E-DG visually observes and collect samples of storm water discharges from all drainage areas. When the facility's storm water discharges are commingled with run-on from surrounding areas, the operator will identify visual observation and sample collection locations that have not been commingled by run-on. The non-mingled storm water represents the quality and quantity of the facility's storm water discharges.

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

All storm drains and outfalls from the property shall be sampled. The storm drain and out-fall areas are identified on the Site Map.

6.4 Storm Water Sampling Procedure:

Sampling shall consist of a grab sample from a storm event that produces significant storm water discharge that is preceded by at least three (3) working days of dry weather. The grab sample should be taken during the first 60 minutes of the discharge. If a sample can not be taken during the first sixty (60) minutes, reasons for not collecting a grab sample will be documented in the records. The exact time will be documented.

NOTE: All sampling and sample preservation shall be in accordance with the current edition of "Standard Methods for the Examination of Water and Wastewater" (American Public Health Association). All laboratory analyses must be conducted according to test procedures under 40 CFR Part 136, unless other test procedures have been specified in this General Permit or by the Regional Water Board. All metals shall be reported as total metals. All laboratory analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services.

Wet Season Visual Observations - PG&E-DG will visually observe storm water discharges from one storm event per month during the wet season (October 1st through May 30th). During this Wet Season, all storm drains and outfalls will be visually inspected during the first hour of one storm event per month that produces significant storm water discharge. Visual observations are only required of storm water discharges that occur during daylight hours that are preceded by at least three (3) working days without storm water discharges and that occur during scheduled facility operating hours. This inspection will be conducted to observe the presence of floating and suspended material, oil and grease, discoloration, turbidity, and odor, etc. Records shall be maintained of observation dates, locations observed, and response taken to reduce or prevent pollutants in storm water discharges. (See Observation Forms Section 7.0)

Dry Season Observations - No less than twice during the dry season (June 1st through September 30th), all storm drains will be visually inspected for the presence of non-storm water discharges. All non-storm water discharges shall be sampled and analyzed. Results shall be recorded and maintained. This facility does not have non-storm water discharges. If PG&E-DG identifies any non-storm water discharges, they will be investigated and eliminated. (See Observation Forms Section 7.0)

Sampling and Observation Exceptions - PG&E-DG shall be prepared to collect samples and conduct visual observations at the beginning of the wet season (i.e. October 1st 2001) and throughout the wet season until the minimum requirements are completed with the following exceptions:

1. PG&E-DG is not required to collect a sample and conduct visual observations due to dangerous weather conditions, such as flooding, electrical storm, etc. Similarly, samples are not required when storm water discharges begin after scheduled facility

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

operating hours or when storm water discharges are not preceded by three working days without discharge.

2. PG&E-DG may conduct visual observations and sample collection more than one hour after discharge begins if the PG&E-DG determines that the objectives will be satisfied. PG&E-DG shall include an explanation in the Annual Report why the visual observations and sample collection was conducted after the first hour of discharge.

6.5 Annual Inspection

At a minimum, an annual inspection of the facility will be performed. This inspection will identify any areas of noncompliance. The inspection shall include the types and volumes of industrial activity in comparison with the pollution prevention measures. A certification of compliance, based upon the site inspection requirement of the General Permit and the SWPPP shall be submitted with the annual report. (First report due July 1st and annually thereafter.)

6.6 Annual Comprehensive Site Compliance Evaluation

The Operator shall conduct one Annual Comprehensive Site Compliance Evaluation in each reporting period (July 1-June 30). The SWPPP shall be revised, as appropriate, and the revisions implemented within 90 days of the evaluation. Evaluations shall include the following:

- A review of all visual observation records, inspection records, and sampling and analysis results.
- A visual inspection of all potential pollutant sources for evidence of, or the potential for, pollutants entering the drainage system.
- A review and evaluation of all BMP's (both structural and non-structural) to determine whether the BMP's are adequate properly implemented and maintained. This will also help determine if additional BMP's are needed. A visual inspection of equipment needed to implement the SWPPP, such as spill response equipment, shall be included.
- The evaluation report that includes,
 - (i) Identification of personnel performing the evaluation,
 - (ii) The date(s) of the evaluation,
 - (iii) Necessary SWPPP revisions,
 - (iv) Schedule for implementing SWPPP revisions,
 - (v) All incidents of non-compliance and the corrective actions taken, and
 - (vi) Include a certification that the facility operator is in compliance with this General Permit (See Section 7.0 Evaluation Form).

PG&E – Dispersed Generating Company, LLC
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

6.7 Record-Keeping

Records of all Storm Water Monitoring information and copies of all reports (including the Annual Reports) required by the General Permit will be retained for a period of five years. These records shall include:

- (a) The date, places, and time of the Inspections, sampling, and visual observations;
- (b) The individual(s) performing these functions;
- (c) The date and time of analysis;
- (d) The laboratory and individual who performed the analysis;
- (e) Wet and dry season visual observation records; and
- (f) Visual and sample collection exception records.
- (g) The records of any corrective actions and follow-up activities that resulted from the visual observations.

6.8 Annual Reporting

PG&E-DG shall submit an Annual Report by July 1st of each year to the Executive Officer of the San Diego Regional Water Quality Control Board (RWQCB). The report shall include a summary of visual observations, and sampling results. The report shall also have a narrative evaluation of the visual observation and sampling and analysis results with laboratory reports. The report shall have the write-up of the Annual Comprehensive Site Compliance Evaluation. The annual report shall have all records associated with storm water attached. PG&E-DG shall prepare and submit their Annual Reports using the annual report forms provided by the San Diego RWQCB. The Annual Report shall be signed and certified in accordance with Standard Provisions General Permit as presented below:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather, and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

16.1 Conformance with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National Electric Code

This section includes text changes that have been made for CEC Application Section 16.1. The attached text replaces the corresponding text in the May 11, 2001 Application.

16.1 Conformance with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National Electric Code

The Chula Vista II project will comply with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National Electric Code.

Please refer to Appendix H for the one-line diagrams of the interconnection facilities installed for the existing Chula Vista I. No additional facilities are required.