APPLICANT'S SUPPLEMENTAL RESPONSE TO DATA REQUEST 16 AND 26: ADDITIONAL INFORMATION REGARDING WORKER SAFETY

In this section of Applicant's Supplemental Response to CEC Staff Data Request 16 and 26, Applicant describes the changes to the Worker Safety section that will result from the changes to the Project Description relating to the removal of Unit 3. Per staff's request, Applicant uses a strike-out/underline format to identify changes to the Worker Safety section of the Application for Certification that will result from the changes to the Project Description.

The Worker Safety sub-sections that have been modified are listed in the table of contents below. If there has been no change to a Worker Safety sub-section relating to Applicant's Supplemental Response to Data Request 16 and 26, the section is labeled "no changes" in the table of contents below.

TABLE OF CONTENTS

5.16 Worker Health and Safety 5.16-1
5.16.1 Introduction (Please refer to the updated Project Description in Section 2.1.1) 5.16-1
5.16.2 Laws, Ordinances, Regulations, and Standards 5.16-1
5.16.2.1 Federal 5.16-1
5.16.2.2 State (no changes) 5.16-2
5.16.2.3 Local (no changes) 5.16-2
5.16.3 Affected Environment 5.16-2
5.16.4 Environmental Consequences 5.16-2
5.16.4.1 Occupational Health and Safety 5.16-2
5.16.5 Cumulative Impacts (no changes) 5.16-4
5.16.6 Mitigation Measures (no changes) 5.16-4
5.16.7 Involved Agencies and Agency Contacts (no changes) 5.16-4
5.16.8 Permits Required and Permit Schedule (no changes) 5.16-4
5.16.9 References (no changes) 5.16-4

Tables

Table 5.16-1 Laws, Ordinances, Regulations and Standards (LORS) (no changes)
Table 5.16-2 Potential Worker Hazards during Project Construction (no changes)
Table 5.16-3 Basic Protective Equipment Guide (no changes)
Table 5.16-4 Potential Worker Hazards during Project Operation and Maintenance (no changes)
Table 5.16-5 Sample Emergency Action/Emergency Response Plan Outline (no changes)
Table 5.16-6 Agency Contacts (no changes)
Table 5.16-7 Applicable Permits (no changes)

5.16 WORKER HEALTH AND SAFETY

5.16.1 Introduction (Please refer to the updated Project Description in Section 2.1.1)

5.16.2 Laws, Ordinances, Regulations, and Standards

5.16.2.1 Federal

Rio Mesa SEGF will comply with all federal LORS by developing appropriate plans and policies as well as by implementing the measures described in Section 5.16.4.1. The federal LORS applicable to the Project are described below.

National Environmental Policy Act of 1969

The National Environmental Policy Act (NEPA) establishes a public, interdisciplinary framework for Federal agencies reviewing projects under their jurisdiction to consider environmental impacts. NEPA's basic policy is to assure that all branches of government give proper consideration to the environment prior to undertaking any major federal action that significantly affects the environment.

The Bureau of Land Management (BLM), as lead Federal agency for the Project, is responsible for preparation of an Environmental Impact Statement (EIS) in compliance with NEPA to evaluate the environmental impacts of the portions of the Rio Mesa project ~~SEGF on~~ federal lands. ~~The Rio Mesa Solar III plant and the~~ ~~Only t~~The Project gen-tie line, upgraded Bradshaw Trail access road, and construction/emergency backup power supply line are~~-~~ located on public lands administered and managed by the BLM. NEPA compliance is required for these portions of the Project through preparation of a Draft and Final EIS. The Applicant anticipates that BLM may consider RMS 1 and 2 as a connected action under NEPA. BLM is also responsible for Native American consultation, including government to government consultation regarding project facilities on BLM land.

Occupational Safety and Health Act of 1970 (OSHA), 29 USC §§651 et seq.; 29 CFR §§1910 et seq.; and 29 CFR §§1926 et seq. (no changes)

Department of Labor, Safety and Health Regulations for Construction Promulgated Under §333 of the Contract Work Hours and Safety Standards Act, 40 USC §§ 327 et seq. (no changes)

National Fire Protection Association (no change)

5.16.2.2 State (no changes)

5.16.2.3 Local (no changes)

5.16.3 Affected Environment

The project site consists of previously disturbed land. Unexploded ordnance (UXO) and munitions and explosives of concern (MEC) are potentially present on-site, as the military used much of the desert for training exercises during World War II.

Construction of the entire generating facility, from site preparation and grading to commercial operation, is expected to take place from the Fourth Quarter of 2013 to the First Quarter of 2016. Construction of the shared facilities will occur during construction of the first plant. Based on an approximate 35~~36~~-month construction period, there will be an average and peak workforce of approximately 840~~1,040~~ and 2,200~~2,500~~, respectively. The workforce will consist of construction craft people, supervisory, support, and construction management personnel. The peak construction site workforce level is expected to occur in Months 22 and 23~~ 21~~. During some construction periods and during the start-up phase of the project, some activities will occur 24 hours per day, 7 days per week.

Management, engineering, administrative staff, skilled workers, and operators will serve ~~all three~~both plants. Rio Mesa SEGF is expected to employ up to ~~150~~100 full-time employees: 30 with Rio Mesa I, 30 with Rio Mesa II, ~~and 30 with Rio Mesa III~~, as well as ~~60~~40 for the common area. The facility will be operated 7 days a week, typically up to 16 hours per day.

5.16.4 Environmental Consequences

The following sections discuss the potential environmental consequences associated with the proposed Project.

5.16.4.1 Occupational Health and Safety

Construction activities may expose workers to the hazards identified in Table 5.16-2. Exposure to these hazards can be minimized through adherence to appropriate engineering design criteria and administrative controls, use of applicable PPE, and compliance with all applicable health and safety LORS. The programs, regulations, and preventive measures intended to control potential worker health and safety impacts associated with these hazards are described in the remainder of this section. These elements provide a comprehensive health, safety, and fire prevention program and an accident/injury prevention

program intended to ensure healthful and safe operations at the facility. With implementation of this program, construction and operational activities associated with the Project will not result in any significant environmental impacts to health and safety.

Construction Health and Safety Program (no changes)

Plant Operational Safety Program (no changes)

Fire Prevention Plan (no changes)

Fire Suppression

The fire protection system will be designed and installed in accordance with code requirements to mitigate fire hazards, reduce potential property loss and protect personnel. Automatic and manual fire protection systems will be provided as necessary. The fire protection system will incorporate a fire alarm system with means to automatically or manually detect and suppress fires until they can be extinguished by qualified onsite or offsite personnel. The equipment identified below will be provided for the common area and in each of the two~~three~~ plants.

- A 2-hour dedicated fire water storage tank, two main fire water pumps (one electric-motor-driven and one diesel-engine driven) and a jockey pump. Automatic start for the fire pumps. Once started, the pump(s) will continue to run until manually stopped.
- Structural steel metal enclosure for the fire pumps. The enclosure will have a fire wall separating the diesel and electric fire pumps.
- An underground fire main header around the power block and in the common area with yard hydrants. Fire hydrants will be spaced at approximately 250-foot intervals.
- Sprinkler and fixed spray systems designed and installed in accordance with NFPA 13 and NFPA 15, respectively. Gaseous clean agent suppression systems will be designed and installed in accordance with NFPA 2001.
- A proprietary, multiplex, addressable, smoke and fire detection system, with local structure fire alarms, automatic fire detectors, and fire signaling panels as required by design codes and in accordance with NFPA 72.
- Portable fire extinguishers will be located throughout the common area and each plant. These extinguishers will be sized, rated, and spaced in accordance with NFPA 10.
- All fire protection equipment and components will be Underwriters Laboratories (UL) listed (or preferably Factory Mutual [FM] approved) for fire protection service, where possible.

The Rio Mesa SEGF on-site fire suppression systems will be backed up by fire suppression support from the RCFD. Both fire and emergency service will be provided out of Ripley Fire Station 44 located at 13987 Main Street. The estimated response time to the project site is 14 to 16 minutes. Firewater will be supplied from the firewater distribution system, as described in Section 2.2.12, Fire Protection.

5.16.5 Cumulative Impacts (no changes)

5.16.6 Mitigation Measures (no changes)

5.16.7 Involved Agencies and Agency Contacts (no changes)

5.16.8 Permits Required and Permit Schedule (no changes)

5.16.9 References (no changes)