CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov

March 30, 2006

DOCKET
05-AFC-3
DATE MAR 30 2006
RECD. MAR 30 2006

Mr. Tom McCabe
Regional Vice President-Environmental Health & Safety
Edison Mission Energy
18101 Von Karman Ave, Suite 1700
Irvine, CA 92612-1046

Dear Mr. McCabe,

SUN VALLEY ENERGY PROJECT (05-AFC-3) DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests that Valle del Sol, LLC, supply the information specified in the enclosed data requests.

The subject areas addressed in the enclosed data requests 81 through 90 are soils and water resources. The information requested is necessary to understand the project, assess whether the project would result in significant environmental effects, and to assess project alternatives and mitigation measures.

Written responses to the enclosed data requests are due to the Energy Commission staff by May 1, 2006, or a later date agreed upon by the Energy Commission staff and the applicant.

If you are unable to provide the information requested in the data requests or object to providing it, you must notify the committee assigned to the project and the project manager, within 10 days of receiving these requests, stating your reason for delay or objection.

If you have any questions regarding the enclosed data requests, please call me at (916) 651-8853.

Sincerely,

Robert Worl

Robert Worl
Project Manager

Enclosure
cc:
Proof of Service
Docket (05-AFC-3)

PROOF OF SERVICE (REVISED 3/3/06) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 3/30/06

Technical Area: Soils and Water Resources
Author: Richard Latteri

BACKGROUND

Section 8.15, page 10 of the Application for Certification states that the Sun Valley Energy Project (SVEP) proposes to discharge 0.12 million gallons of non-process wastewater into the Eastern Municipal Water District (EMWD) sewer system and 39.5 million gallons of nonreclaimable wastewater annually into the EMWD Temescal Valley Regional Interceptor and Santa Ana Regional Interceptor pipeline systems to the Orange County Sanitation District's (OCSD) wastewater treatment facilities. According to Sections 8.15.5.3.2 and 8.15.5.3.3 of the AFC, discharges from the SVEP will be required to have a Waste Discharge Permit for both of these wastewater streams showing that the SVEP will meet the discharge limitations of the EMWD Waste Discharge Permit and other numeric and narrative standards provided in EMWD Ordinance No. 59.5 and Ordinance No. 91. These permits, issued for a 5-year renewable term, are required prior to any discharges to the system. Staff requires information on the characteristics of the wastewater streams for its analysis of potential project impacts.

DATA REQUEST

81. Please provide the information that is required to assure that the SVEP will meet the requirements for an EMWD Waste Discharge Permit that complies with Ordinance No. 59.5, which allows SVEP to discharge 0.12 million gallons per year of domestic wastewater into EMWD's sewer system. The information should include the following:
    a. discharge limitations,
    b. pretreatment requirements,
    c. peak flow restrictions,
    d. monitoring and reporting requirements.

82. Please provide the information that is required to assure that the SVEP will meet the requirements for an EMWD Waste Discharge Permit that complies with Ordinance No. 91, which will allow SVEP to discharge 39.5 million gallons per year of nonreclaimable wastewater into the EMWD/OCSD's nonreclaimable sewer system. The information should include the following:
    a. discharge limitations,
    b. pretreatment requirements,
    c. peak flow restrictions,
    d. monitoring and reporting requirements.

BACKGROUND

Section 8.15.5.1 of the AFC states that the industrial wastewater discharge from the SVEP would flow to either OCSD's Reclamation Plant No. 1 or Treatment Plant No. 2, both of which operate under an existing NPDES permit. Section 18.15.2.2 of the AFC states that the SVEP industrial wastewater discharge would be conveyed to OCSD's wastewater treatment plant, Plant No.1.

DATA REQUEST

83. Please clarify this discrepancy.

BACKGROUND

On December 21, 2005, the EMWD Board of Directors approved the 2005 Urban Water Management Plan (UWMP). The 2005 UWMP states the EMWD operates and maintains four regional water reclamation facilities (RWRF) capable of producing tertiary treated recycled water. The UWMP further states that interconnections between each treatment plant allow for operational flexibility, improved reliability, and expanded deliveries of recycled water.

DATA REQUEST

84. In the event of an unforced outage to the recycled water system or a recycled water pipeline failure that causes a seven day interruption of recycled water to the SVEP, please provide a contingency plan for a backup source of non-potable water for plant cooling and process makeup, which is estimated to be 1,500 gallons per minute.

BACKGROUND

The 2005 Urban Water Management Plan (UWMP) on pages 71 and 72 states that EMWD is committed to maximizing recycled water use wherever possible and that tertiary treated recycled water is currently priced at approximately one third of the cost of potable water. EMWD Ordinance No. 68.2 promotes the conservation and reuse of water resources and ensures maximum public benefit from the use of EMWD's recycled water supply by regulating its use in accordance with applicable federal, state, and local regulations. In accordance with Ordinance No. 68.2, the SVEP would be required to obtain a Recycled Water Agreement for the use of recycled water at the SVEP. The SVEP proposes to use potable water supplied by EMWD during power plant construction for dust control, equipment washdown, and hydrostatic testing.

DATA REQUEST

85. Please provide a Recycled Water Agreement that complies with Ordinance No. 68.2 and allows for the use of potable water for dust control, equipment washdown, and hydrostatic testing during power plant construction.

BACKGROUND

Figure 8.15-3 shows the 100-year floodplain and the potential for flooding northeast and west of the SVEP site. Flood flows appear to be impeded by the existing elevated railroad grade.

DATA REQUEST

86. Please discuss whether the elevated railroad grade is designed as a flood protection structure and provide its elevation?

87. Please provide the grade elevation of the railroad bed and tracks near the project site.

88. Please discuss whether the potential flooding from the 100-year storm west of the SVEP site is a result of drainage or seepage through the railroad grade.

89. Please discuss whether the elevation of the SVEP is above the elevation of the 100-year flood event.

BACKGROUND

The SVEP is located within the San Jacinto River Watershed where Lake Elsinore is designated as an impaired water body. The Santa Ana Regional Water Quality Control Board (SARWQCB) has issued Order No. 01-34, which regulates stormwater discharge associated with new development. Order No. 01-34 was issued specifically to regulate pollutants in stormwater discharge to surface waters tributary to Lake Elsinore.

Within the San Jacinto Watershed, the provisions of Order No. 01-34 supersede those of the State Water Resources Control Board's General Construction NPDES permit. Order No. 01-34 requires SWPPPs for projects within the San Jacinto watershed to contain additional water pollution monitoring and reporting requirements.

In addition to the SWPPP that complies with Order No. 01-34, the Energy Commission will require a Drainage Erosion and Sediment Control Plan (DESCP) subject to the approval of the Compliance Project Manager. The DESCP will contain all information required in a SWPPP while also incorporating local stormwater standards and ordinances. The DESCP will be subject to several evaluations and revisions before the project is certified. While Section 8.15.2.4 of the AFC discusses stormwater runoff and

drainage, all water pollution controls will need to be aggregated into a draft plan early on to ensure construction can begin with appropriate controls in place.

DATA REQUEST

90. Please provide a draft DESCP that includes the following elements:
    a. An outline of the site management activities to be implemented during site mobilization, excavation, and construction of all project elements including all pipelines and the off-site conductor support tower for the stub transmission line.
    b. Within the draft DESCP, please provide a discussion of those additional requirements of Order No. 01-34 and the Riverside County Flood Control and Water Conservation District's Water Quality Management Plan.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE SUN VALLEY ENERGY PROJECT (SVEP)	**DOCKET NO. 05-AFC-3** **(Revised 3/3/2006)**

PROOF OF SERVICE LIST

DOCKET UNIT

Send the original signed document plus the required 12 copies to the address below:

CALIFORNIA ENERGY COMMISSION
DOCKET UNIT, MS-4
*Attn: Docket No. **05-AFC-3**
1516 Ninth Street
Sacramento, CA 95814-5512
E-mail: docket@energy.state.ca.us

* * * *

In addition to the documents sent to the Commission Docket Unit, also send individual copies of any documents to:

APPLICANT

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***Revisions to POS List, i.e. updates, additions and/or deletions**
SUN VALLEY ENERGY PROJECT Docket No. 05-AFC-3

INTERESTED AGENCIES

None listed as of 3/3/2006

INTERVENORS

California Unions for Reliable Energy
(CURE)
C/O Marc D. Joseph
Gloria D. Smith
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, California 94080

DECLARATION OF SERVICE

I, **Angela \Hockaday** declare that on **March 30, 2006** I deposited copies of the attached **Data Requests** in the United States mail at Sacramento, CA with first class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210.

I declare under penalty of perjury that the foregoing is true and correct.

Angela Hockaday
[signature]

***Revisions to POS List, i.e. updates, additions and/or deletions**
SUN VALLEY ENERGY PROJECT Docket No. 05-AFC-3

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INTERNAL DISTRIBUTION LIST

FOR YOUR INFORMATION ONLY! Parties **DO NOT** mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

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MS-33

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