

# Waste Management (76-80)

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## Investigation Protocol

76. *Please provide a protocol and schedule for conducting the above investigation and any applicable remediation for the power plant area, associated laydown area, and all appurtenant locations. The schedule will need to reflect best and worst case planning scenarios with all appurtenant locations. The schedule will need to reflect best and worst case planning scenarios with all applicable assumptions and milestones. The protocol would be subject to the approval of Energy Commission staff and that of the Department of Toxic Substances Control (DTSC). The Applicant is encouraged to enter into a Voluntary Cleanup Agreement with the Cypress regional office of DTSC to avail of any post investigation/remedial certification from DTSC. Copies of all correspondence between the Applicant and DTSC that are applicable to a Voluntary Cleanup Agreement shall be made available to the Energy Commission on a timely basis.*

**Response:** Per the Phase I Environmental Site Assessment (ESA) identified in the AFC, the project site was identified as potentially having pesticide contamination, similar to agricultural farmland in the vicinity of the project site. The Phase I ESA recommended that soil and groundwater samples be taken prior to purchase or use of the site. The Applicant will conduct limited investigations to sample and analyze pesticide concentrations in the soil and groundwater as construction planning begins. A copy of these analytical results will be provided to the CEC. Once analytical results are available VSE will work with the CEC and DTSC to determine the appropriate next steps to protect public and worker safety.

## Waste Quantities

77. *Please clarify tonnages of hazardous and nonhazardous wastes applicable to this project.*

**Response:** An editorial error was made to section 8.14.2.4, Waste Disposal Summary. The paragraph should be revised as follows (changes are in bold):

### 8.14.2.4 Waste Disposal Summary

The SVEP facility will generate nonhazardous solid waste that will add to the total waste generated in Riverside County and in California. However, there is adequate recycling and landfill capacity in California to recycle and dispose of the waste generated by SVEP. It is estimated that SVEP will generate approximately **115** tons of solid waste during construction and about **37** tons a year from operations (including approximately **3,000 pounds** of hazardous waste).

## Recycling Goals

78. *Please expand the discussion in Section 8.14.4 to include goals/targets (e.g., annual recycling goal of 25 percent during first three years of operation) that the applicant plans to commit to for each hierarchical approach and also identify the procedures that will be put in place to measure effectiveness.*

**Response:** VSE is committed to recycling to the greatest extent feasible. As such, VSE is committed to preparing a Construction Waste Management Plan and an Operation Waste Management Plan for all wastes generated during construction and operation of the facility. These plans will include a description of all waste streams, including projections of frequency, amounts generated and hazard classifications; and methods of managing each waste stream, including treatment methods and companies contracted with for treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/reduction plans. These plans will be prepared before construction begins, when detailed engineering on the facility is completed.

## Licensed Transporters

79. *Describe the protocol that will be used to evaluate and select these businesses and whether the applicant intends to audit or use equivalent methods, prior to use.*

**Response:** Although waste facilities are identified in the AFC, the final determination of where waste will be sent is dependent on capacity remaining at the sites at the time of construction and operation, accepted wastes, and the exact profile of wastes to be generated by VSE. A Construction Waste Management Plan and Operation Waste Management Plan will be prepared prior to site mobilization and site operation and will identify specific wastes to be generated at the site, and the licensed transporters and facilities that will be accepting the wastes, as well as the protocol used to determine acceptability.

## Containment Margin

80. *Provide a discussion justifying that the 20 percent margin will be adequate for containment of hazardous wastes. Include in the discussion, any detailed back up calculations leading to the specifications of the proposed containment.*

**Response:** The 20 percent margin was to contain rainfall if the hazardous waste was stored in an uncovered area. Since the SVEP hazardous waste storage area will be covered, the 20 percent extra margin for rainfall is not needed. The waste will, however, be stored on secondary containment with enough capacity for a spill from the largest container.