

**CALIFORNIA ENERGY COMMISSION**1516 NINTH STREET  
SACRAMENTO, CA 95814-5512

January 23, 2003

Randy Baysinger  
Assistant General Manager  
Power Generation Administration  
Turlock Irrigation District  
P.O. Box 949  
Turlock, CA 95381-0949

Dear Mr. Basinger:

**RE: WALNUT ENERGY CENTER DATA REQUESTS**

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

These data requests are being made in the area of: Air Quality (#1-23); Biology (#24-34); Cultural Resources (#35-59); Geology (#60-65); Land Use (#66-69); Noise (#70); Public Health (#71); Traffic and Transportation (#72); Visual Resources (#73-83); Soil and Water Resources (#84-97); and Waste Management (#98-102). We are asking that you supply your responses within 30 days. Accordingly, written responses to the enclosed data requests are due to the Energy Commission staff on or before February 24, 2003, or at such later date as may be mutually agreed upon.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to the Committee and me within 10 days of receipt of this notice. The notification must contain the reasons for the inability to provide the information or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions regarding the enclosed data requests, please call me at (916) 654-4067.

Sincerely,

MATT TRASK  
Energy Facility Siting Project Manager

Enclosure

cc: Docket (02-AFC-4)  
Proof of Service List (Interested Parties/Agencies)

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area: Air Quality**

**Authors: William Walters and Lisa Blewitt**

## **BACKGROUND**

The AFC notes that the Walnut Energy Center will be located adjacent to Turlock Irrigation District's existing Walnut Peaking Power Plant. However, certain information regarding the Walnut Peaking Power Plant was not provided in the AFC, and is not otherwise readily available. In order to better understand the overall impacts of all sources at the project site, staff requests more information regarding the Walnut Peaking Power Plant.

## **DATA REQUESTS**

1. Please provide a copy of the SJVAPCD Permit to Operate for the Walnut Peaking Power Plant.
2. Please identify all of the non-permitted emission sources at the Walnut Peaking Power Plant and their estimated hourly and annual emissions.
3. Please provide the date the Walnut Peaking Power Plant began operation.
4. Please, on a legible plot plan, show the location of the Walnut Peaking Power Plant exhaust stacks in relation to the proposed Walnut Energy Center exhaust stacks.
5. Please provide the exhaust stack parameters (x-y-z coordinates, height, diameter, velocity, temperature) for the Walnut Peaking Power Plant emissions sources.

## **BACKGROUND**

In the AFC, linear projects for the WEC include a 0.9-mile potable water supply pipeline and a 3.6-mile natural gas pipeline (AFC page 1-1). The potable water line is not discussed as part of the construction phase impacts analysis (AFC Appendix 8.1D.2). Additionally, the construction phase impacts analysis is based on a 3.2-mile long natural gas pipeline. Staff feels the potable water supply pipeline impacts need to be determined and included in the construction phase impacts analysis. Additionally, the basis for the natural gas pipeline should be consistent.

## **DATA REQUESTS**

6. Please provide a construction emissions estimate for the construction of the potable water supply pipeline. Please update all necessary tables in Appendix 8.1D to include the potable water pipeline construction emissions.
7. Please confirm the construction assumption bases for the natural gas pipeline, including the total length and pipeline route. Please update the emission estimate for the natural gas pipeline construction as necessary.

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## **BACKGROUND**

In the AFC (Table 8.1D-3), offsite maximum daily emissions include truck deliveries and worker travel. However, Attachment 8.1D-1 appears to show only truck deliveries. These numbers are reported in Table 8.1D-3 for both truck deliveries and worker travel.

## **DATA REQUESTS**

8. Please confirm the emissions (maximum daily emissions) for truck deliveries and worker travel associated with pipeline/ transmission line interconnect construction. Please update AFC Table 8.1D-3 as required.

## **BACKGROUND**

In the AFC (Table 8.1-15), it is noted that SO<sub>2</sub> maximum emission rates for the gas turbines are based on fuel sulfur content of 0.36 grains/100 scf. Staff has reviewed other projects that have proposed sulfur contents around 0.25 grains/100 scf based on available sulfur content data from PG&E or Sempra Energy; or have proposed sulfur contents based on the Public Utility Commission fuel sulfur limit of 0.75 grains/100 scf for pipeline quality natural gas.

## **DATA REQUEST**

9. Please provide a copy of the reference for the turbine fuel sulfur content assumption.

## **BACKGROUND**

Maximum emission rates expected during startup or shutdown are provided for NO<sub>x</sub>, CO, and VOC for the turbines in the AFC, and additional information for hot starts and cold starts is provided in Appendix 8.1A. However, while all of the potential startup and shutdown modes (cold start, warm start, hot start and shutdown) may have different maximum emission potentials and different durations, the values presented in Table 8.1-17 (AFC page 8.1-37) only specify a single set of startup/shutdown emission values based on the Cold Start emission estimates. Staff needs additional information and clarification regarding startup and shutdown emissions to complete the review of the air quality impact analysis.

## **DATA REQUESTS**

10. Please provide a description of the expected durations of a warm startup and a shutdown.
11. Please confirm that a single maximum hourly and per start/shutdown emission limit is being requested for all types of startups (cold, warm, and hot) and shutdowns, or provide the hourly and per start/shutdown basis for each acceptable emission limit.
12. Staff would expect that warm startups and shutdowns would have a shorter duration than that for cold starts and that they may also have lower peak and average emissions for certain pollutants. So, if a single short-term emission limit

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

(maximum hourly and per emissions) is being requested to cover all startups and shutdowns, please provide the data showing the need for these limits during hot and warm startups and during shutdowns.

## **BACKGROUND**

Operating emissions mitigation, in the form of emission reduction credits (ERCs), are based on quarterly operating emission limits within the jurisdiction of the San Joaquin Valley Air Pollution Control District. The revised operating case information provided in the AFC Supplement does not specify quarterly emission assumptions. Additionally, the emissions assumptions are not internally consistent for all pollutants. Staff needs additional information to determine that the emissions mitigation and operating emissions assumptions are consistent, and that compliance with the emission limits can be demonstrated.

## **DATA REQUESTS**

13. Please provide the quarterly operating emission assumptions.
14. Please explain how the turbine operation can be assumed to be limited to 7,280 hours of full load operation for NO<sub>x</sub>, CO and VOC emissions, and assumed to be operated for 8,760 hours at full load for SO<sub>2</sub> and PM<sub>10</sub> emissions. Is the Applicant proposing to accept an operating limitation of 7,280 hours at full load annually, or some similar fuel based limit; or does the Applicant expect to operate in a manner that will maintain the emissions below the specified quarterly and annual emission limits without any specific operating limits?
15. Staff recognizes that the Applicant will install NO<sub>x</sub> and CO continuous emission monitors to demonstrate compliance with the quarterly and annual emission limits for those pollutants; however, no VOC monitor will be available to make the same compliance demonstration. Please state whether the applicant is willing to determine a CO/VOC surrogate relationship to demonstrate compliance with VOC emission limits.

## **BACKGROUND**

The AFC (Table 8.1-18, page 8.1-38), states that project CO emissions will be limited to less than 100 tons per year (tpy). Table 8.1-18 (revised version), however, shows the maximum annual CO emissions to be 101.7 tpy.

## **DATA REQUEST**

16. Please explain how CO emissions will be limited to 100 tpy and reflect this in Table 8.1-18. The assumptions used should be consistent, or at least not inconsistent, with those being used to limit NO<sub>x</sub> and VOC emissions. Please update AFC Table 8.1-18 as required.

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## **BACKGROUND**

A general discussion of emission scenarios possible during commissioning, and emission rates and stack parameters used in the commissioning modeling analysis are provided in the AFC (page 8.1-49 and Table 8.1-21). Staff requires additional information regarding initial commissioning.

## **DATA REQUESTS**

17. Please provide a description of the project's planned initial commissioning phase, including the types and duration's of equipment tests, criteria pollutant emissions, estimated stack parameters (i.e. velocity and temperature) for each test type, and monitoring techniques to be used during such tests.
18. Please provide the total duration for initial commissioning per turbine, estimate the total period commissioning period emissions, and estimate the number of hours operating with elevated emissions (i.e. greater than normal operating emissions), and specify whether if any of the commissioning activities will be performed simultaneously for the two turbines.

## **BACKGROUND**

In the AFC (page 2-18), the Applicant states that noisy construction "will be scheduled between 7 a.m. and 7 p.m. on weekdays and 9 a.m. to 8 p.m. on weekends and holidays." The modeling files, however, show construction from 6 a.m. to 6 p.m. Staff feels this discrepancy could affect construction modeling results due the high impacts normally associated with low mixing heights and low wind speeds that occur during early morning hours.

## **DATA REQUEST**

19. Please verify the basis for maximum daily construction hours. Please provide updated construction emissions tables and modeling files as necessary.

## **BACKGROUND**

In the AFC (page 8.1-59), the Applicant states that due to the lack of a long-term demonstration of compliance with the NO<sub>x</sub> emissions limit of 2.0 ppmvd @ 15% O<sub>2</sub> on a one-hour average basis, they will seek a permit condition allowing up to 10 hours per year of excursions above this level.

## **DATA REQUESTS**

20. Please specify the proposed maximum NO<sub>x</sub> concentration at 15 percent O<sub>2</sub> to be allowed by permit condition during the proposed 10 hours per year of excursions.
21. Please also describe the technical circumstances that would be incorporated in permit limits that would allow a greater than 2 ppm NO<sub>x</sub> limit average over 1 hour.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

## **BACKGROUND**

In the Air Quality Data Adequacy Responses (page 8.1-F-1), the Applicant states that the ERCs owned by the Applicant for PM<sub>10</sub> amount to 179,357 lbs (Q1=48,926; Q2=41,945; Q3=10,020; and Q4=78,466). Copies of the ERC Certificates are provided in the AFC (Attachment 8.1F-1). Staff requires additional information to verify the quantity of PM<sub>10</sub> ERC certificates owned by the Applicant.

## **DATA REQUEST**

22. Based on the certificates provided in the AFC, the project emissions in the fourth quarter (Q4) do not add up to 78,466 lbs, so there appears to be an ERC shortfall. Please provide additional ERC certificates, or binding option contract agreements, that show that the Applicant can meet the total PM<sub>10</sub> offset burden. This information can be provided under confidential cover if requested, with the understanding that the information will become public when the Final Staff Assessment is published.

## **BACKGROUND**

In the AFC (page 8.1-63), the Applicant states that a cumulative impacts analysis will be conducted in accordance with the protocol provided in Appendix 8.1G.

## **DATA REQUEST**

23. Please provide a listing of cumulative projects meeting the criteria outlined in Appendix 8.1G, and provide an analysis of the cumulative air quality impacts that may result from the project and other reasonably foreseeable projects.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area: Biological Resources**

**Author:** Melinda Dorin

## **BACKGROUND**

On page 8.2-7, the AFC states that initial field surveys have been completed but additional surveys will be conducted for specific species during the appropriate seasons.

## **DATA REQUESTS**

24. Please submit additional survey results for special status plants. Include the dates and duration of the studies, methods used to complete the studies and the names and qualifications of individuals conducting the studies.
25. Please submit additional survey results for Swainson's hawk nesting sites. Include the dates and duration of the studies, methods used to complete the studies, and the names and qualifications of individuals conducting the studies.
26. Please submit additional survey results for burrowing owl nesting sites. Include the dates and duration of the studies, methods used to complete the studies, and the names and qualifications of individuals conducting the studies. Report any sightings of burrowing owl individuals, or recent sign of burrow use.
27. Please submit additional survey results for other protected species, such as migratory birds and white-tailed kites, that may use the site or associated linear facilities for foraging or nesting. Include the dates and duration of the studies, methods used to complete the studies, and the names and qualifications of individuals conducting the studies.
28. Please submit additional survey results for vernal pool invertebrate species. Include the dates and duration of the studies, methods used to complete the studies and the names and qualifications of individuals conducting the studies.

## **BACKGROUND**

On page 8.2-15 the AFC states that the Lateral No. 5 drain will be crossed by the natural gas pipeline using either the jack and bore or horizontal directional drill method. On pages 8.2-16 and 8.2-17 there is also information on the potential wetlands and waters that may be crossed by construction of the proposed gas pipeline and the permits that may be required. At the site visit on December 16, 2002, there was also a discussion on the time of year and the methods used to avoid potential impacts to the canal and downstream in the Harding Drain.

## **DATA REQUESTS**

29. Please identify what methods and Best Management Practices would be used if construction were completed when the canal is dry versus when the canal is in use. Include a draft frac-out plan, or rational why it is not appropriate to include.

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30. Please provide a copy of the completed Clean Water Act Section 404 Permit application when it is submitted to the Army Corp of Engineers. A copy of the application is necessary for staff to complete the Final Staff Assessment.
31. Please provide a copy of the completed Clean Water Act Section 401 (Water Quality Certification) application when it is submitted to the Regional Water Quality Control Board. A copy of the application is necessary for staff to complete the Final Staff Assessment.

**BACKGROUND**

At the site visit on December 16, 2002, CEC staff was told that the California Department of Fish and Game (CDFG) would require a streambed alteration agreement application (DFG code section 1600) as notification of the proposed gas pipeline crossing Lateral Drain No. 5.

**DATA REQUEST**

32. Provide a copy of the completed Streambed Alteration Agreement application when it is submitted to the CDFG. A copy of the application is necessary for staff to complete the Final Staff Assessment.

**BACKGROUND**

At the site visit on December 16, 2002, CEC staff was told that there would be a short access road from the railroad tracks to the site.

**DATA REQUESTS**

33. Please provide a description of the road, including the location, whether it would be paved, and if it is permanent or temporary.
34. Please provide a figure depicting the location of the road.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area: Cultural Resources**  
**Author: Gary Reinoehl**

## **BACKGROUND**

The AFC indicates that letters were sent on September 5, 2002, to the individuals and organizations provided by the Native American Heritage Commission requesting information on culturally sensitive areas. The AFC states that a summary of the results of consultations with the individual Native American organizations will be provided in a future filing. This information is part of the background investigations that are carried out to determine whether there are cultural resources that could be impacted by the project.

## **DATA REQUESTS**

35. Please provide a summary of additional consultations made with Native American individuals and tribes documenting effort to identify cultural resources and Native American concerns regarding this project.
36. Please provide a schedule for any additional meetings with Native Americans and submittal of summaries of the meetings or conversations.

## **BACKGROUND**

The Cultural Resources Management Report indicates that a complete general reconnaissance for architectural resources was performed by Dr. Bard, Mr. Sharpe, and Mr. McClintock with evaluation of architectural and historical significance being conducted by Ms. Clavit.

## **DATA REQUESTS**

37. Please describe the methodology involved in a "complete general reconnaissance for architectural resources."
38. Please indicate if Ms. Clavit has viewed the actual buildings and structures that she evaluated or whether she has only seen photographs or other images of the buildings and structures.

## **BACKGROUND**

Table 4 in the Cultural Resources Management Report provides a summary of the buildings and structures that were identified as being within the project area. The table includes the Assessor's Parcel Number (APN) the name or address of the building/structure, the date of construction, and indicates whether the building/structure(s) were recommended as eligible or ineligible for the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR). When comparing the information provided in Table 4 with the DPR 523 forms, discrepancies were noted: some of the APNs and addresses in the table do not match those on the forms, 34 DPR forms were provided but only 30 resources are listed in the table, not all of the dates of construction in the table matched those noted on the forms.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

## **DATA REQUEST**

39. Please provide a table that accurately reflects all of the resources that were recorded correlating the APN and the address, dates of construction, and other relevant information.

## **BACKGROUND**

The Cultural Resources Management Report contained DPR 523 forms for 34 resources. Some of the forms depict and describe the same building/structure but have different addresses: 1230 Commons Road and 5500 Commons Road; 207 Holland Drive and 331 Holland Drive; 3650 Commons Road and 3700 Commons Road; and 5600 Clayton Road and 5600 Commons Road at Clayton Road. If any of the parcels and associated buildings have more than one address, both addresses should appear on a single form that records the resource.

## **DATA REQUEST**

40. Please review the DPR 523 forms for 1230 Commons Road, 5500 Commons Road, 207 Holland Drive, 331 Holland Drive; 3650 Commons Road, 3700 Commons Road, 5600 Clayton Road, and 5600 Commons Road at Clayton Road and provide DPR 523 forms for each of the resources.

## **BACKGROUND**

Table 4 includes the Tidewater Southern Railroad and Canal Lateral No. 5 in the list of resources within the project area. The report includes a discussion of the two resources. The confidential appendix includes a copy of the site record for the Tidewater Southern Railroad outside of the project area. The discussion indicates that the resources have been evaluated by other specialists as not meeting the criteria for eligibility to the NRHP.

## **DATA REQUESTS**

41. Please provide an update for the Tidewater Southern Railroad record that includes the portion of the resource that is within the project area.
42. Please indicate whether there has been concurrence by the California Office of Historic Preservation (CA SHPO) or a decision by an agency that determines the eligibility of each of these resources, and if so, identify that agency.
43. If there has not been a concurrence by the California Office of Historic Preservation (CA SHPO) under federal regulations or a decision by an agency under CEQA, then please provide a full discussion of the eligibility of the resource, including a discussion of the character defining attributes of this resource type and the aspects of integrity.
44. Please provide a DPR 523 record for Canal Lateral No. 5 that includes the portion of the resource within the project area.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

## **BACKGROUND**

The Cultural Resources Management Report states that breaches of Lateral No.5 would not produce any permanent damage. It goes on to state that such a breach would not affect the resources eligibility for the NRHP or the CRHR because those types of operations do not diminish the historic values associated with historical canals. A breach of the canal would cause a loss of historic materials if the materials removed were from the period of significance. The breach and repair of the canal would also constitute a change in workmanship from the period of significance. Whether a breach and repair of the canal would effect the canal would depend on the character defining elements, the manner in which the repair is completed, and how the character defining elements might be changed.

## **DATA REQUESTS**

45. Please provide, as part of the DPR 523 requested in data request 44, the period of significance for Lateral No. 5, a discussion of the character defining attributes for the lateral as they were within the period of significance, the criteria under which the resource may be eligible, and a context within which the eligibility of the resource can be considered.
46. Please provide a discussion of various construction techniques for the crossing of Lateral No. 5, including breach and repair, jack and bore, and directional drilling, and the impacts of each technique on the resource and the justification of the preferred technique.

## **BACKGROUND**

A cultural resources survey report has been provided that provides the methodology of the surveys, the names of the staff performing the surveys, and the results of the surveys. The California Office of Historic Preservation provides instructions for completing the records (Department of Parks and Recreation Form 523) and the required fields that have to be completed. The DPR 523 forms included an evaluation of the resources. For many of the resources, only architecture is considered, not all of the criteria for eligibility. A historic context was not included on the form or in the report text to weigh the eligibility of the resources. In most cases there is a brief discussion of the integrity of the resource and a consideration is only given to one or two aspects of integrity, not all seven aspects of integrity.

## **DATA REQUESTS**

47. Please provide a DPR 523A form for each of the resources that indicates the name of the individual who completed the form, and the company name.
48. Please provide a DPR 523B form that lists only the name of the individual who meets the Secretary of the Interior's Professional Standards for completing the evaluation per the requirements of the CA OHP. (Please ensure that the proper form designation is used in the footer.)

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49. Please include a discussion of the seven aspects of integrity on the DPR 523 form for the resources that the evaluator believes has lost so much integrity that it would not be eligible for either the NRHP or the CRHR.
50. Please provide a context within which the eligibility of the resources are being considered per the California Office of Historic Preservation 1995 publication entitled *Instructions for Recording Historical Resources*.
51. Please provide a discussion of the eligibility under each of the criteria for the NRHP and the CRHR.

## **BACKGROUND**

A Proposed Native American Burial Protection Program Plan is provided in the Cultural Resources Management Report and in an appendix to the AFC. The plan includes terminology that is not consistent with state law, suppositions about recommendations for treatment of human remains and grave related goods, and procedures that are not consistent with state laws.

## **DATA REQUEST**

52. Please either revise the plan or indicate that the applicant is withdrawing the plan and will comply with state law.

## **BACKGROUND**

Cultural resources that are on lists created by local jurisdictions and could qualify as historical resources, and could be affected by the project, must be considered in the analysis. Staff needs the following information to complete the analysis.

## **DATA REQUESTS**

53. Please provide copies of local lists of important cultural or historic resources designated by a local ordinance by the City of Turlock or Stanislaus County.
54. If any of these resources could be affected by the project or could have their immediate surroundings altered (change in the integrity of setting) by this project in such a manner that the significance of the historical resource would be materially impaired, then please provide a copy of the requirements used by the local jurisdictions to qualify for the listing.
55. If any of the historical resources could be affected by the project or could have their immediate surroundings altered (change in the integrity of setting) by this project in such a manner that the significance of the historical resource would be materially impaired, and they have not been recorded on a DPR 523 form, then please record such cultural resources on DPR 523 forms and provide a copy of the forms.
56. If any of the resources could be affected by the project or could have their immediate surroundings altered (change in the integrity of setting) by this project in such a manner that the significance of the historical resource would be

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

materially impaired, please provide a discussion of the significance of the resources under CEQA Section 15064.5, (a), (3), (A)(B)(C) & (D) and provide staff with a copy of the assessment and the specialist's conclusions regarding significance.

## **BACKGROUND**

In some cases, local historical and archaeological societies have knowledge of cultural resources in an area of a project that may not be available through normal record sources. Staff needs the following information to complete the analysis.

## **DATA REQUESTS**

57. Please inquire with any local historical and archaeological societies that might have knowledge of historical or archaeological resources in the area of the project. Please provide copies of the inquiry letters and any responses.
58. If any such resources are identified that could be affected by the project or could have their immediate surroundings altered (change in the integrity of the setting) by this project in such a manner that the significance of the historical resource would be materially impaired, and they have not been recorded on a DPR 523 form, then please record the cultural resources on the DPR 523 form and provide a copy of the form.
59. If any of the resources could be affected by the project or could have their immediate surroundings altered (change in the integrity of setting) by this project in such a manner that the significance of the historical resource would be materially impaired, please provide a discussion of the significance of the resources under CEQA Section 15064.5(a), (3), (A)(B)(C) and (D) and provide staff with a copy of the assessment and the specialist's conclusions regarding the significance.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area:** Geology and Paleontology  
**Author:** Dal Hunter, Ph.D., C.E.G.

## **BACKGROUND**

A site-specific geotechnical report is described in the AFC in Section 8.15.3.6 as being available in late October 2002.

## **DATA REQUEST**

60. Please provide a copy of the site-specific geotechnical report.

## **BACKGROUND**

Section 8.15.6 of the AFC states that no permits are required for geological LORS; however, the City of Turlock does require grading permits for construction projects within city limits. Stanislaus County also requires grading permits for construction projects lying outside the boundaries of recognized municipalities.

## **DATA REQUEST**

61. Please provide permit requirements for the City of Turlock and Stanislaus County.

## **BACKGROUND**

Figure 8.15-1 shows the geology around the WEC plant site for a radius of 2 miles. Linear facilities associated with WEC are not shown on the geologic map.

## **DATA REQUEST**

62. Please show linear facilities associated with the WEC on Figure 8.15-1, Geologic Map.

## **BACKGROUND**

Figure 8.16-1 shows the locations of known fossil sites near the WEC plant site. Neither the WEC plant site nor associated linear facilities are shown on the map.

## **DATA REQUEST**

63. Please show the location of the WEC plant site and associated linear facilities.

## **BACKGROUND**

Figure 2 of Appendix 10G (Geologic and Foundation Design Criteria) shows four soil borings (SB-3 through SB-6); however, the included logs are for SB-1, SB-2, SB-3, and SB-6. In addition, several log pages are missing.

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## **DATA REQUEST**

64. Please correct this inconsistency and provide the missing pages in Appendix 10G.

## **BACKGROUND**

Distances to active faults in California for seismic design are typically determined using the Uniform Building Code (UBC) publication *Maps of Known Active Fault Near-Source Zones in California and Adjacent Portions of Nevada*. The AFC in Section 8.15.3.5 appears to use the Caltrans publication *California Seismic Hazard Map 1996, based on Maximum Credible Earthquakes*. In addition, distances to faults from the WEC plant site differ depending upon the source used. The EQFAULT program can also be used to calculate deterministic peak ground accelerations (DPGA) based upon the California Geological Survey (CGS) fault database.

## **DATA REQUEST**

65. Please provide detailed information as to the actual source of fault distances and the method of calculating peak ground accelerations. In addition, please document the use of methods deviating from standard UBC practice and provide a table showing active faults and associated moment magnitude, distance, and DPGA values within a 62 mi (100 km) radius of the WEC plant site.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area: Land Use**  
**Author: David Flores**

## **BACKGROUND**

The AFC (Sec. 8.4.3.3.2) indicates that the project site is zoned Industrial, but is currently being actively farmed. The parcel is considered irrigated prime farmland. Under CEQA, the permanent loss of prime agricultural land generally constitutes a significant impact. The applicant, in response to the CEC data adequacy comments; indicated "that if the decision makers find a significant unmitigated farmland impact associated with the project and absent an override, the applicant will provide mitigation similar to the mitigation provided by the applicants for which the Commission has found significant farmland impacts."

## **DATA REQUEST**

66. The aforementioned proposal by the applicant does not provide specific information on how they will mitigate for the loss of prime agricultural land.
  - a. Please provide a timeline for discussions or proposals with a local or statewide land trust, farming group, or the City of Turlock planning department in mitigating for the potentially significant impact from the permanent loss of approximately 18 acres of irrigated agricultural land.
  - b. Please summarize any mitigation discussions that have occurred to date.

## **BACKGROUND**

The City of Turlock Zoning Code restricts lot coverage in the industrial zone that includes the project site. The site plan does not provide calculations of the site area and the aerial extent of proposed roofed structures. This data is required to evaluate project compliance with zone lot coverage requirements.

## **DATA REQUEST**

67. Provide calculations to show the project's consistency with the City of Turlock's Industrial Zone lot coverage standards with respect to:
  - a. The aerial extent of the project site (i.e. the entire ultimate legal parcels proposed for development) in square feet.
  - b. The aerial extent of proposed and existing structures with roofs in square feet to show consistency with City of Turlock's lot coverage standards.

## **BACKGROUND**

The applicant has indicated that the plant site would occupy approximately 18-acres of the 69-acre property with the remainder available for agricultural use. To the extent that the balance of the land will continue in agricultural use, staff is unclear whether the

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applicant will create a separate parcel for the remaining 51 acres in accordance with the Subdivision Map.

**DATA REQUEST**

68. Explain whether a land division procedure will be used to create the 51-acre remainder parcel.
69. If a parcel map is prepared, provide a copy of the recorded final map, lot line adjustment map, or Certificate of Compliance for the subject property(ies).

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area:** Noise and Vibration  
**Author:** Steve Baker

## **BACKGROUND**

The Noise LORS applicable to residences near the project site differ, depending on whether the residence lies within the Turlock City Limits or in the County of Stanislaus. Staff has been unable to determine, from the AFC and from the City's website, which residences near the site lie within the City Limits.

## **DATA REQUEST**

70. Please provide information showing which of the residences near the site lie within the Turlock City Limits, and which lie without. Include, as a minimum, those residences identified in the AFC, Figure 8.5-2, as Noise Monitoring Locations M1 through M4.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area:** Public Health  
**Author:** Obed Odoemelam  
**Technical Senior:** Mike Ringer

## **BACKGROUND**

The health risks from exposure to the project's toxic pollutants should be calculated to reflect the contribution from all applicable exposure pathways, including noninhalation. The California Air Pollution Control Officers Association Revised 1992 Risk Assessment Guidelines (p. III-19) recommend that a screening health risk assessment include the following four minimum pathways: inhalation, soil ingestion, dermal exposure, and mother's milk. The total hazard indices for noncancer impacts and the cancer risk should be calculated to reflect the potential impacts on all potentially affected organs. Additional information is needed to facilitate evaluation of the health risks from the project's toxic pollutants.

## **DATA REQUEST**

71. Please provide a health risk assessment that includes the total chronic noncancer hazard index and cancer risk estimate for each applicable toxicant as contributed by all applicable exposure pathways. All data should be discussed for appropriate context and presented in the relevant appendices.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area:** Traffic/Transportation  
**Author:** Mark R. Hamblin

## **BACKGROUND**

The roadways and highway that would potentially be used by construction workers traveling to the Walnut Energy Center project are State Highway 99, West Main Street, and South Washington Road. Currently, State Highway 99 is operating at traffic Level of Service (LOS) F (AFC, pg. 8.10-10). LOS F represents the most congested, slow traffic conditions. The proposed project's peak construction work force is estimated to be 205 workers (AFC, pg. 8.10-14), which would introduce additional vehicles and vehicle trip generation to a portion of State Highway 99.

## **DATA REQUEST**

72.
  - a. Provide a summary of any discussion(s) with Caltrans, which has jurisdiction over State Highway 99, of the potential traffic effect(s) (i.e. influx of construction workers' vehicles, construction vehicles and truck delivery) along that portion of State Highway 99, shown on Figure 8.10-1 of the AFC, within the vicinity of the proposed project.
  - b. Discuss any mitigation for the project's traffic impacts to State Highway 99 given its current LOS F status.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area: Visual Resources**  
**Author: Eric Knight and William Walters**

## **BACKGROUND**

The visual simulations provided in the AFC do not appear to accurately depict the size of the various project structures relative to each other, or the scale or location of the power plant relative to the various key observation points (KOPs). According to Table 8.11-2 and the elevation views (Figures 2.2-2a and 2.2-2b) provided in the AFC, the HRSG units, not including the highest drums and relief valves, are approximately half as tall as the HRSG stacks (65 feet and 132 feet tall, respectively). The simulations for KOPs 2, 4, and 5 do not accurately depict the size of these structures relative to each other (i.e., the HRSGs appear to be much less than half the size of the stacks). In KOP 2, the project does not appear to be in the correct position relative to the Foster Farms silos. It seems that the project should be located to the left somewhat. In addition, the base of the project is simulated too close to the KOP, when in reality it would appear farther away than the base of the Foster Farms facility. In KOP 3, the project structures appear to be placed too far to the right in the simulation. The cooling tower is not shown in the simulation for KOP 4, which would seem to be visible from this location. Also, some of the new project structures (which are assumed to be the 69 kV transmission poles) appear to be protruding from behind one of the agricultural-related industrial facilities to the east of the project site, which is not consistent with the site plans. KOPs 4 and 5 are essentially the same distance from the project site, yet the project appears much larger in the simulation for KOP 5 than it does in KOP 4.

## **DATA REQUEST**

73. Please revise the simulations for KOP<sub>1</sub>, 2, 3, 4 and 5, so they accurately represent the size of the various project structures relative to each other, and the scale and location of the project relative to the KOPs and existing structures and features in the view.
74. Please provide high quality 11" x 17" color photocopies of the visual simulations. The images need to be presented at "life-size" scale, when held at a normal reading distance of 18 inches. Please also provide high resolution electronic copies of these images.

## **BACKGROUND**

KOP 2 was selected to represent both the views of residences and travelers along West Main Street. The photograph shown in AFC Figure 8.11-10a was taken from the property located at 4813 West Main Street. The photograph depicts a view more representative of the residence than a worst-case view that eastbound travelers on West Main Street would have as they stop at the intersection of West Main Street and Washington Road. As shown in the photo simulation (Figure 8.11-10b), from the residence, the power plant is partially obscured by the stop sign and utility pole in the foreground of the view. However, the sign and pole would not obstruct the view of

# WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS

vehicles stopped at the intersection. According to the AFC, the Turlock General Plan designates West Main Street as a “Gateway Route,” and requires design review of projects within view of such roadways. As reported in the AFC, West Main Street has a traffic volume of 7,425 vehicles per day. In addition, the entire project is not shown in the simulation (i.e., a portion of the cooling tower is cropped).

## DATA REQUEST

75. Please take a new photograph and prepare a new simulation for KOP 2 that would show the existing view of the site and the entire project as seen by a driver in the eastbound lane of West Main Street, stopped at the intersection with Washington Road.
76. Please provide high quality 11” x 17” color photocopies of the existing conditions photograph and visual simulation. The images need to be presented at “life-size” scale, when held at a normal reading distance of 18 inches. Please also provide high resolution electronic copies of these images.

## BACKGROUND

AFC Page 8.11-12 (section 8.11.3.3.3) states that TID only proposes to install landscaping at the project site entrance, and not around the entire perimeter of the site. The AFC further states that the “cropped agricultural land [adjacent to the site] would serve as a *partial* buffer to the Ruble Road residences to the south of the project site because it would not screen all project facilities from view” (emphasis added). Tables 8.11-4 and 8.11-5 in the Visual Resources section of the AFC identify several General Plan policies and a Zoning Ordinance requirement addressing the issue of *increasing* the compatibility of industrial and abutting residential uses, and *minimizing* impacts adversely affecting residential uses in relation to visual quality. In the discussion of the project’s conformance with the Industry Implementing Policy 2.5-i, the AFC states that “TID proposes to buffer the project on its southern side from the nearby residences on Ruble Road by landscaping.” This statement conflicts with the discussion in section 8.11.3.3.3 that states that no landscaping is proposed for the site perimeter.

## DATA REQUEST

77. Please clarify how the project site would be landscaped.
78. If landscaping would not be provided on the southern perimeter of the site, please explain how the project would fully comply with General Plan Policies 2.5-h and 2.5-i, and Zoning Ordinance 9-2-109(a)(2).
79. Please provide a conceptual landscape plan (at a scale of 1” = 40’) depicting the plants proposed to screen the project and enhance the visual quality of the site consistent with the requirements of the Turlock General Plan and Zoning Ordinance. The plan should describe the type and number of plants to be installed and their sizes at the time of planting. The plan should also describe

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the growth rate and times to maturity of the plant species selected, as well as their height at 5 years and at maturity.

## **BACKGROUND**

Table 8.11-5 identifies Zoning Ordinance 9-2-118 (Screening of mechanical equipment) as applicable to the project. This provision requires that exterior mechanical equipment be screened from view on all sides. Equipment to be screened includes, but is not limited to, heating, air conditioning, refrigeration equipment, plumbing lines, duct work, and transformers. The consistency discussion in the AFC states that slats in the surrounding chain link fence will screen mechanical equipment. However, the fencing would not screen the mechanical equipment and appurtenances (piping, steam drums, relief valves, and vent silencers) located at the top of the HRSG units, for instance, which would be most visible from the nearby residences on Ruble Road. These project elements would appear to be similar in character to the equipment (e.g. duct work and plumbing lines) identified in the ordinance required to be screened. Section 8.11.7.6 (Summary of Project's Conformity with Applicable LORS) states that "[a]lthough the mechanical equipment associated with the project would not be completely screened from view, it would be screened to the degree that it is feasible." No screening measures other than fencing are discussed.

## **DATA REQUEST**

80. Please provide a detailed discussion on the feasibility and need of screening the project's mechanical equipment (such as the top works on the HRSGs) with architectural panels, steel mesh, louvers, or other screening techniques.

## **BACKGROUND**

Staff plans to perform a plume modeling analysis for the cooling tower. Staff needs additional project data to complete this analysis.

## **DATA REQUEST**

81. Please summarize for the cooling tower the conditions that affect vapor plume formation, including cooling tower heat rejection, exhaust temperature, and exhaust mass flow rate. These values should account for a range of ambient conditions in order to model a reasonable worst-case operating scenario. For example, ambient conditions from the turbine emissions and operating parameters of AFC Appendix 8.1-A are provided in the table below; however a similar, alternative range of conditions may be provided in the response. Please provide values to complete the table.

Additional combinations of temperature and relative humidity, if provided by the applicant, will be used to more accurately represent the cooling tower exhaust conditions

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Parameter	Cooling Tower Exhausts		
Number Of Cells	5 Cells (in 1 x 5 array)		
Cell Height*	17.07 meters (56 feet)		
Cell Diameter*	11.338 meters (37.2 feet)		
Tower Housing Length*	82.6 meters (271 feet)		
Tower Housing Width*	16.8 meters (55 feet)		
Ambient Temperature	32°F	61°F	97°F
Ambient Relative Humidity	90 %	59 %	26 %
Heat Rejection (MW/hr)			
Exhaust Temperature (°F)			
Exhaust Flow Rate (lb/hr)			

\*Stack dimensions from air quality modeling file Turl\_03.dat. Tower length and width are from AFC Table 8.11-2.

82. Please indicate if the cooling tower has any plume mitigation features that would reduce the exhaust moisture content, which will otherwise be assumed to be saturated.
  
83. Please provide a fogging frequency curve from the anticipated cooling tower vendor, if available.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area: Soils and Water Resources**  
**Author: M. Lorraine White**

## **BACKGROUND**

Construction and operation of the Turlock Irrigation District's Walnut Energy Center (WEC) may induce water and wind erosion at the power plant site and along its linear facilities. The applicant proposes to locate the power plant on 18 acres within a 69-acre parcel. The remaining 51 acres of the site will be used for construction laydown and site access. The site is surrounded by agricultural, residential and utility uses. An Erosion and Sediment Control Plan is needed addressing construction activities at the power plant site, the laydown area and any associated linear or other facilities, such as transmission lines, pipelines, and staging/storage areas. The purpose of the plan is to minimize the area disturbed, to protect disturbed and sensitive areas, to retain sediment on-site and to minimize off-site effects of water and wind erosion.

Storm water runoff may come in contact with contaminants during construction and operation of the project. A Storm Water Pollution Prevention Plan (SWPPP) will be necessary, addressing how drainage into the onsite stormwater pond(s) (AFC, p. 8.14-16) will be monitored for contaminants before allowing water to percolate into the ground. Currently, storm water that falls at the site naturally percolates into the soils. According to Section 8.14.5 of the AFC, the site's storm water will drain into an onsite stormwater percolation pond via a system of pipes, drains and swales in accordance with the City of Turlock's Specifications and Design Standards. According to the AFC the pond(s) will be designed to contain approximately 2 acre-feet of stormwater runoff (p. 8.14-17).

## **DATA REQUESTS**

84. Please provide a draft Erosion and Sedimentation Control Plan that identifies all measures that will be implemented at various locations of the project during construction and operation of the proposed WEC. The plan must address the plant site, construction laydown area and all ancillary facilities.
  - a. The draft Erosion and Sedimentation Control Plan must identify all permanent and temporary BMPs in written form and depicted on a construction drawing(s) of appropriate scale to be employed to control water and wind related erosion and offsite sedimentation during construction and operation.
  - b. Any measures necessary to address federal or regional permits (i.e., Nationwide Permits, Streambed Alteration Agreements, or 401 Certification) as required, should be identified.
  - c. The plan must also identify maintenance and monitoring efforts for all erosion control measures.

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- d. This plan must be consistent with the Erosion Control and Revegetation Plan as specified in the Biological Resource Mitigation Implementation and Monitoring Plan and the proposed Grading Plan.
  - e. Please provide representative profiles and cross sections of areas that will be cut and filled, in relation to the proposed conceptual location of BMP's for erosion control during construction.
  - f. Please provide a discussion of all assumptions, calculations, measures, and any other data or information that demonstrates the proposed plan will conform with the City of Turlock's Specifications and Design Standards.
85. Please provide a draft Storm Water Pollution Prevention Plan (SWPPP) consistent with the requirements for a General Storm Water Construction Activity Permit for the proposed WEC.
- a. The draft SWPPP shall identify all permanent and temporary BMPs in written form and depict conceptual locations in order to prevent or avoid contamination of stormwater.
  - b. The draft plan should also address the RWQCB's comments as applicable.
  - c. Various contaminant sources will be present at the site. Various chemicals used during operation, chemical cleaning and washwater wastes (containing high concentrations of metals) and other contaminants will be stored onsite, some in potable tanks or sumps (AFC, p. 2-14). Please show possible storage locations at the site and specify appropriate BMPs that will be used to prevent spills or leaks of contaminants and measures to be employed in the event of such an occurrence. Specifically address how stormwater that has come into contact with any contaminated materials will be collected, treated, and discharged.
  - d. Please discuss the design storm that will be used to calculate additional capacity required in the contained areas surrounding outside chemical storage areas (see Appendix 10F, pg. APP 10F-3).
  - e. During construction, it is possible that groundwater will be encountered (APP 10G-5). Please discuss dewatering activities/techniques that may be needed, including disposal of associated water.
  - f. Please address how any contaminated soil or groundwater that may be excavated or encountered during construction will be collected, treated, and discharged.
  - g. Please discuss the anticipated water quality of wastewater discharged during hydrostatic testing, anticipated disposal of this waste stream and any appropriate BMPs to ensure no discharge of contaminants to surface or groundwater will result from hydrostatic testing (p. 25 of Data Adequacy Response WR-5). Please confirm that there will be no offsite disposal of construction wastewater including hydrostatic testing wastewater.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

## **BACKGROUND**

In the Applicant's Data Adequacy Response WR-3 (Dec. 12, 2002), construction water demands may be met from the following sources: an existing on-site well located on the proposed 69 acre parcel, TID's existing well at the Walnut Substation, TID surface (irrigation) water and City of Turlock potable water. Since recycled water will not be available during construction, it is not a viable source.

## **DATA REQUEST**

86. Please provide additional information regarding the proposed use of nearby wells to serve construction water supplies to the project. Include in this information a discussion and diagrams of the existing facilities, the depth of the wells and operating capabilities. In particular, if modifications to the existing wells are required or pipelines will be needed to convey water from these wells, provide a detailed description of the needed modification, required pipelines (size and routing) and any other changes needed to use these facilities. Please also explain proposed use of these wells after the completion of construction of the WEC.
87. Please provide information on the proposed use of TID surface irrigation water, including the location of the water, diversion and or conveyance structures required to transport supplies to the site (and their routes) and expected water quality.
88. Please provide capacity and routing information for any temporary pipelines needed to convey City of Turlock potable water to the construction site until such time as the permanent pipeline is installed.

## **BACKGROUND**

A brief groundwater discussion is provided on pages 8.14-9 and 8.14-10 of the AFC. Three documents are referenced in this discussion.

## **DATA REQUEST**

89. Please provide copies of the following referenced documents: Groundwater Management Plan for the Turlock Basin (1997); Water System Master Plan (1993); and Master Environmental Assessment for the City General Plan (City of Turlock, 2002a).

## **BACKGROUND**

As discussed on p. 8.14-10 of the AFC, the project site is within the dam failure inundation zone for the New Don Pedro Dam.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

## **DATA REQUEST**

90. Please provide information of the expected worse case depth of projected inundation, and any design features incorporated into the WEC that will minimize damage from inundation on the plant.
91. Please provide a copy of the studies done regarding the modeled failure of the new Don Pedro Dam (referenced as City of Turlock 2002b).

## **BACKGROUND**

The applicant proposes to dispose of sanitary wastewater into an on-site septic system and leach field (AFC, p. 2-9). No specific information on the design and or capacity is provided to verify that the construction and operation of the system will conform to local requirements. Depth to groundwater at the site is discussed in several parts of the AFC and is said to occur 7 to 12 feet below ground surface. However, groundwater depths may be shallower according to the AFC, occurring on the order of 1 to 2 feet below ground surface.

## **DATA REQUEST**

92. Please provide a preliminary design for the sanitary septic system, including all features, capacity, calculations, and assumptions. Please provide a discussion of the conformance of the design with specific local requirements. Include a discussion of any needed features to address the occurrence of shallow groundwater.
93. Please locate on an appropriate site map the proposed location of the septic leach field.

## **BACKGROUND**

WEC will require approximately 1,800 acre-feet/year of water to meet its operational requirements. Ninety-seven percent of this demand is for cooling purposes. The applicant is proposing to use recycled water as soon as the City of Turlock has completed modifications to their wastewater treatment plant (WWTP) to meet new discharge requirements and makes Title 22 recycled water available. Until recycled water is provided to WEC, the applicant proposes to use potable water supplied by the city to meet project demands.

The AFC (p. 8.14-14) includes a discussion of the conformity of the project with State Water Resources Control Board's 1975 policy (SWRCB Policy 75-58) regarding power plant cooling and alternatives. All SWRCB 75-58-specified alternatives were found to be either environmental undesirable or economically unsound compared to the applicant's proposed supply of recycled water. The applicant did not evaluate the possibility of using dry cooling or poor quality groundwater in the vicinity of the project. The applicant states on page 8.14-14 that no sources of naturally brackish water exists

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

in the vicinity of the project, yet shallow groundwater does exist at the site (see Section 8.15 and Appendix 10G) and staff has been informed that it is of poor quality. No alternative analysis to the use of potable water for the bridge or back-up supply was done.

## **DATA REQUEST**

94. Please provide details regarding the feasibility and environmental impact analyses conducted by the applicant regarding alternative water supplies, including:
  - a. impacts on water use, other users of these supplies and waste discharge in comparison to those supplies currently proposed for the project;
  - b. all economic factors considered (such as capital and operating costs including water purchase and infrastructure price; efficiency losses and economic impacts; etc...) and all assumptions and or vendor data to support these estimates;
  - c. changes in plant and linear facility infrastructure required to support each technology;
  - d. plant efficiency and output calculations and assumptions for each alternative considered; and
  - e. all information sources and or references.
95. Since alternative cooling technologies were not included in the AFC discussion of alternatives, please provide an evaluation of the use of dry and wet/dry cooling alternatives as compared to the proposed use of recycled water for plant cooling. Include in this discussion information regarding the differences in environmental impacts and capital and operating costs.
96. Provide a feasibility analysis of using the Harding Drain irrigation return water or the shallow, low quality groundwater supply as an alternative to potable water for the bridge and back-up water supplies.
97. The applicant has indicated that the cooling towers will operate at approximately 3.5 cycles of concentration. Other facilities that have employed zero discharge systems are capable of greater cycles of concentration, thus maximizing the efficiency of water use on site. Please provide an analysis and discussion of the possibilities of cycling the concentrations in the cooling towers up to 10, 15 and 20 times. Include in the analysis the use of a side stream softening system. Explain any constraints that may limit the number of cycles of concentration. The analysis should include the impacts on water use and waste discharge, economic impacts (capital and operating costs), plant efficiency and output.

# **WALNUT ENERGY CENTER (02-AFC-4) DATA REQUESTS**

**Technical Area:** Waste Management  
**Author:** Ellen Townsend-Hough

## **BACKGROUND**

The project will generate 8 tons/day of salt cake. The AFC indicates that, based on the proposed design of the facility, this material could be classified as hazardous or nonhazardous. AFC p. 2-12 states that the salt cake is expected to be nonhazardous and taken offsite for disposal in a municipal landfill, while AFC table 8.13-2 indicates disposal in a class II/III landfill if nonhazardous. Even if classified as nonhazardous, salt cake would still be considered a designated waste requiring disposal at a class II landfill. Please provide the following additional information, required to evaluate the impacts of salt cake processing and disposal.

## **DATA REQUEST**

98. Please identify all of the Class II landfills that could be used to dispose of the salt cake from the Walnut Energy Project.

## **BACKGROUND**

The AFC includes a Phase II Environmental Site Assessment (ESA) that presents results of sampling for pesticide residues and heavy metals, based on the recommendations of the Phase I ESA. The Department of Toxic Substances Control has issued a document entitled Interim Guidance for Sampling Agricultural Fields for School Sites (Second Revision) dated August 26, 2002. Staff notes that the data provided in the AFC does not conform precisely to the data recommendations in the above guidance document, and staff will coordinate with DTSC to resolve outstanding issues. The following data requests are in addition to any further information DTSC may need in order to provide their conclusions to staff.

## **DATA REQUEST**

99. Please provide a copy of Figure 1 referred to in the Phase II ESA.
100. Please provide the laboratory detection limits used in Table 1 of the Phase II ESA.
101. Please indicate if offsite sampling was performed for metals in order to conclude that the metals detected were "deemed as naturally occurring compounds indigenous to the soils in the area (AFC p. 8.13-4)."
102. Please indicate why subsurface samples were not taken per DTSC guidance.