VICTORVILLE 2 HYBRID POWER PROJECT (07-AFC-01)
CEC STAFF DATA REQUEST NUMBERS 105-110

Technical Area: Waste Management **Response Date: July 23, 2007**

Data Request 105:

Please provide additional information on the management of the wooden transmission poles to be replaced as part of the proposed project. Include information on whether or not the wooden poles met the criteria for treated wood waste, the number of poles/volume of waste that will be generated, and how the resulting waste will be managed and disposed.

Response:

Any wooden transmission poles replaced as part of the VV2 Project's Segment 3 transmission line will be handled by Southern California Edison (SCE) through its licensed contractors. SCE disposes of large quantities of such poles system-wide on a regular basis and its contractors have extensive experience with removing, transporting and disposing of such material. SCE cannot confirm at this early stage which specific contractor(s) will be responsible or which disposal sites will be used, but it is clear that SCE and its contractors have the expertise and experience to handle this effort professionally and in full compliance with the applicable LORS.

Data Request 106:

Please also provide a discussion of the applicability of treated wood waste management requirements to any other construction or demolition activities to be conducted for this project (i.e., demolition of residences or structures on project properties, etc.).

Response:

Treated wood waste ("TWW") that is not "utility exempt" pursuant to Section 25143.1.5 of the California Health and Safety Code or subject to Federal regulation under RCRA may be managed under recently State-adopted Alternative Minimum Standards (AMS) if the wood waste is hazardous waste solely due to the presence of a preservative that is registered in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act. Cal. Code Reg. Title 22, § 67386.2. In the event that any Project-related construction or demolition activities require managing TWW, the Project Applicant understands that the AMS requires the VV2 Project to maintain TWW in a manner that minimizes releases to the environment and disallows: unauthorized access to TWW; burning, scavenging, or commingling with other waste if TWW is already segregated; recycling TWW, except for in-site reuse for an approved purpose; sanding, planning, grinding, chipping, shredding, mulching, or otherwise mechanically handling or treating TWW; and improper disposal of TWW. Cal. Code Reg. Title 22, § 67386.3.

In addition, the Project understands its obligation to comply with the AMS notice and recordkeeping provisions, specified conditions for the storing, labeling, and shipping of TWW for disposal in approved TWW facilities, and AMS training requirements for employees handling TWW. Cal. Code Reg. Title 22, §§ 67386.5 - 67386.12.

In the unexpected event that any VV2 Project-related construction or demolition activities require managing TWW that is not utility exempt or eligible for management under the AMS, the Project will comply with the applicable Federal and/or State hazardous waste regulations.

Data Request 107:

Please provide information on the waste transport, recycling, and waste transfer facilities/services that may be used to transport, recycle or otherwise manage project wastes. The information provided should include, as appropriate, the following:

a. facility/company name;
b. phone number;
c. location;
d. class and/or type of service;
e. materials accepted;
f. permit or license for activity;
g. recycling methods used;
h. which project wastes will potentially be managed by the facility/service;
i. permitted capacity;
j. annual usage;
k. remaining capacity;
l. estimated closure date;
m. expiration date for permit or license;
n. approximate distance from site (in miles); and
o. any special conditions or other comments pertinent to the facility or service.

Response:

At this stage of VV2 Project development, no decisions have been made with respect to selecting waste haulers or disposal facilities. Table DR107-1 identifies waste management services providers that serve industrial facilities in the Victorville area and indicates the

location of the facilities, the kinds of services they provide, and their EPA ID numbers. It is expected that the providers of waste management services to the VV2 Project will be selected from this list.

As the Project development process proceeds and the time approaches when waste management services will be needed for the Project, data will be collected on candidate services providers and the Project Applicant will be able to provide the data to the CEC identified in this Data Request. However, the requested data are not available at this time.

Table DR 107-1 Potential Waste Management Services Providers

NAME	ADDRESS	PHONE	TYPE OF SERVICE PROVIDED	EPA ID#
Nursery Products	16285 Aster Road, Adelanto, CA 92301	760-272-1244	Accepts Filter Cake	N/A
McKittrick Waste Treatment	56533 Highway 58 West, McKittrick, CA 93251	661-762-7366	Accepts Crystallizer Solids – Designated Waste	CAD980636831
Safety Kleen Systems	7979 Palm Ave #E Highland, CA	909-862-8300	Petroleum-Naphtha	CAT000613927
Desert Environmental Services, Inc	12563 Caballero Ct, Victorville, CA 92392	760-949-1110	Transport of used oil, oily water, and used oil filters under consolidated manifest	CAR000074542
DeMenno Kerdoon	2000 North Alameda Street, Compton, CA 90222	310-537-7100	Nonhazardous Designated waste recycling (brine water), RCRA hazardous waste TSDF (spills)	CAT080013352
DK Environmental	3650 East 26th Street Los Angeles, CA 90023	323-268-5056	RCRA Hazardous Waste TSDF	CAT080033681
Remedy Environmental Services	3200 E. Frontera Street Anaheim CA, 92806	714-630-2307	Nonhazardous Designated waste recycling (brine water),	CAL000200500
Pacific Resource Recovery	3150 E. Pico Blvd Los Angeles, CA 90023	323-261-7145	Used Paint, Aerosol Cans	CAD008252405
Filter Recycling Service	180 W Monte Avenue Fontana CA 92335	909-421-2012	Used Oily Water Recycling	CAT080025711
Advanced Environmental	13579 Whittram Ave Fontana, CA 92335	909-356-9025	Used Oil Recycling	CAT080025711
AJS Filter Processing	15131 Clark Ave Industry, CA 91745	626-333-5617	Oil Filter Recycling	CAL000097432
Lighting Resources, Inc	805 East Francis St. Ontario, CA 91761	909-923-7252		
Ecology Control Industries	13738 Slover Ave Fontana, CA 92337	909-355-5602		CAR982030173
Fleet Transportation Services	12812 Valley View St. STE 9 Garden Grove, CA 92845	714-799-0801		CAR000119552

Data Request 108:

For each waste stream where Tables 6.16-5 and 6 identified onsite management as "none", please provide more information regarding the onsite management of the wastes or state why no onsite management is required.

Response:

Construction waste (items shown as "none" in AFC Table 6.16-5)

- Empty hazardous material containers will be stored in a temporary waste bin (designated for the purpose) that has appropriate containment and fire prevention capabilities. Material will be accumulated in the bin until transported to a permitted Hazardous waste disposal facility.
- Solvents, used oil, oily rags, and paint will be stored in containers intended for the purpose. The Containers will be stored in an area or temporary storage facility with appropriate containment and fire prevention capabilities. Material will be accumulated until transported by a licensed hauler to an appropriately permitted disposal facility.
- Cleaning Solutions will not be stored on-site. It will be directly pumped into tanker trucks after use for transport to a permitted hazardous waste disposal facility.
- Spent batteries will be stored on-site and then shipped offsite for recycling.
- Scrap wood, concrete, steel, glass, plastic, aluminum, food and paper will be accumulated in waste bins until shipped offsite for disposal or recycling. The bins and offsite shipment will be provided and managed by a licensed local waste disposal company.
- Portable Chemical Toilets (sanitary waste) will be pumped into a tanker truck to be shipped to a sanitary waste treatment facility. The service will be provided and managed by a licensed local portable chemical toilet rental company.

Operations waste (Items shown as "none" in AFC Table 6.16-6)

- Spent SCR catalyst will be removed and wrapped in plastic and covered with tarps then loaded directly onto trucks for shipment offsite.
- Spent demineralizer resin, Anthracite, sand filter media and spent softener resin will be placed in a manufacture recommended container for shipment back to the manufacturer for recycle.
- Cooling tower basin sludge will be accumulated in the cooling tower basin. Periodically, the basin will be drained and the sludge will be shoveled into waste bins

for shipment offsite. Offsite shipment and disposal will be provided and managed by a licensed local waste disposal company.

- Oily water waste from the oil-water separator will be accumulated in an oily water waste tank. As needed, the oily water waste will be pumped directly from the oily water waste tank to a tanker truck for shipment offsite. Offsite shipment and disposal will be provided by a licensed local waste disposal company.

Data Request 109:

Please identify the potential Therminol (or other heat transfer fluid) waste that may be generated by construction, operation or maintenance of the proposed project, including estimated amount of waste to be generated and estimated frequency of generation, as well as onsite and offsite management of the waste.

Response:

The amount of Therminol waste generated is dependent on several factors: mode of generation, if the high boilers are removed and at what efficiency of removal, if partial replacement of fluid volumes occurs, if fluid is spilled and recovered with wetted soil/gravel (and how much was spilled), etc.

Construction. There is not expected to be any Therminol waste during construction. The system will be flushed and hydrotested with water to remove debris, identify leaks, and test leak repairs. Once the system is ready and leak free, it will be filled with Therminol and brought into operation.

Operation. During normal operations, the Therminol is expected to have a life of 8 to 10 years. However, there are several solar plant applications that have had their initial load of Therminol in service for up to 15 years. No operational Therminol waste is expected for the first eight years of VV2 Project operation. However, after eight years, the oil will need to be analyzed to determine if replacement is needed. If replacement is required, a partial replacement will take place to bring the total mixture back to within desired operating parameters. The maximum volume of oil replaced is conservatively estimated at 25 percent of system volume starting at eight years and 0-25 percent of system volume occurring regularly every year thereafter. Total average replacement over the life of the VV2 Project is estimated at 12-13 percent per year.

Onsite Management. Small amounts of Therminol oil recovered during maintenance activities or Therminol-contaminated materials (e.g., soils) will be stored appropriately. Periodically, the material will be shipped offsite for disposal, reclamation, or recycling.

Offsite Management. All Therminol material leaving the site will be shipped in accordance with applicable Federal, State, and local requirements. All material will be shipped to an appropriately licensed facility for reclamation, recycling, or disposal.

Data Request 110:

Please provide additional information on the project site that more fully and clearly identifies the potential wastes and impacts associated with the residences, abandoned structures, vehicles or dump sites found on site. This information should address the following:

a. possible septic tanks or other tanks that may be on site;

b. any possible contamination or sites that need further characterization; and recommendations for further action;

c. assessment and consideration of any possible illegal dumping, waste burning, shooting range, clandestine drug lab, or other activities on the site that may have generated waste or contamination (in addition to evaluating wastes from structures, vehicles, and materials and areas of possible contamination due to squatters or residents on the site).

d. Please provide the Phase I Environmental Site Assessment for the High Desert Power Plant, Victorville, California dated June 4, 2001 and as prepared by GeoTrans, Inc.

Response:

Because acquisition of the occupied parcels within the Project site is still ongoing, Applicant is unable to access the site to characterize any onsite waste. Once Applicant can obtain access, onsite waste will be characterized and disposed of according to applicable law and regulations. Applicant can provide further information at that time.

The Phase I Environmental Site Assessment for HDPP is provided as Attachment DR110-1 on the CD that accompanies this submittal.
