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October 20, 2008

Mr. Dale Rundquist
Compliance Project Manager
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Re: Petition for Modifications No. 1, Walnut Creek Energy Park (05-AC-02)

Dear Mr. Rundquist:

On behalf of Walnut Creek Energy, LLC, please find attached one original and five copies of Petition for Modifications No. 1 for the Walnut Creek Energy Park (05-AFC-02). Also attached are 12 electronic copies of the petition on CD-ROM. Air quality modeling files will be transmitted to you under separate cover. This Petition for Modification proposes to relocate several plant features within the existing property boundary. Changes include the relocation of the fuel gas compressor building and the cooling tower, and the addition of a waste water storage tank. Other minor modifications include the aggregation of the control building with the warehouse and maintenance building, the removal of a recycled chlorination tank and the addition of five high-side electrical breakers.

If you have any questions about this matter, please contact me at (949) 798-7895 or Doug Davy at (916) 286-0278.

Sincerely,

Victor Yamada
Director, Environmental, Health & Safety

Attachment

Copy: Doug Davy, CH2MHill
Kris Kjellman, EME

Edison Mission Energy
18101 Von Karman Avenue
Suite 1700
Irvine, CA 92612-1046

Petition for Modification No. 1

Minor Equipment Location Changes

for the

Walnut Creek Energy Park

City of Industry, California

(05-AFC-02)

Submitted to the:

California Energy Commission

Submitted by:

Walnut Creek Energy, LLC

A wholly owned subsidiary of

EDISON MISSION ENERGY®

An EDISON INTERNATIONAL® Company

With Technical Assistance by:

CH2MHILL

Sacramento, California

October 2008

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Acronyms and Abbreviations

$\mu g/m^3$	micrograms per cubic meter
AFC	Application for Certification
BPIP	Building Profile Input Program
CAISO	California Independent System Operator
CCR	California Code of Regulations
CEC	California Energy Commission
CO	carbon dioxide
EME	Edison Mission Energy
HARP	Hotspots Analysis Reporting Program
HI	Health Index
ISCST3	Industrial Source Complex Short Term Model
KOP	key observation point
LORS	laws, ordinances, regulations, and standards
MEI	Maximally exposed individual
MIR	Maximally Impacted Receptor
NO_2	nitrogen dioxide
NOx	oxides of nitrogen
PM_{10}	particulate matter less than 10 micrometers in aerodynamic diameter
SCE	Southern California Edison
SCR	selective catalytic reduction
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
UTM	Universal Transverse Mercator
WCE	Walnut Creek Energy, LLC
WCEP	Walnut Creek Energy Park

Executive Summary

Walnut Creek Energy, LLC petitions the California Energy Commission to modify the certification for Walnut Creek Energy Park (WCEP) (05-AFC-2). This Petition for Modification proposes to relocate several plant features within the existing property boundary. All proposed modifications would be within the existing facility layout owned by Walnut Creek Energy, LLC, a wholly owned subsidiary of Edison Mission Energy.

The changes include the relocation of the fuel gas compressor building and the cooling tower, and the addition of a wastewater storage tank on the far west end of the site. Other minor modifications include the combination of the control building with the warehouse/maintenance building, the removal of a recycled chlorination tank, and the addition of five high-side electrical breakers.

The project owner does not suggest any revisions to the Conditions of Certification set forth in the February 2008 certification for WCEP. With adherence to the Conditions of Certification, the WCEP, as modified, will not cause significant adverse impacts to the environment.

SECTION 1.0

Introduction

1.1 Overview of Modifications

Walnut Creek Energy, LLC (WCE) petitions the California Energy Commission (CEC) to modify the certification for Walnut Creek Energy Park (WCEP) (05-AFC-2). The Application for Certification (AFC) for this project was filed in 2005 (WCE, 2005) and the facility received CEC certification on February 27, 2008 (CEC, 2008).

This Petition for Modification proposes to relocate several plant features within the existing property boundary. The changes include the relocation of the fuel gas compressor building and the cooling tower and the addition of a wastewater storage tank on the far west end of the site. Other minor modifications include the combination of the control building with the warehouse/maintenance building, the removal of a recycled chlorination tank, and the addition of five high-side electrical breakers. A detailed description of the proposed modifications to the facility general arrangement is included in Section 2.0.

This Petition for Modification contains all of the information that is required pursuant to the CEC's Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes). The information necessary to fulfill the requirements of Section 1769 is contained in Sections 1.0 through 6.0 as summarized in Table 1.1-1.

TABLE 1.1-1
Informational Requirements for Post-Certification Modifications

Section 1769 Requirement	Section of Petition Fulfilling Requirement
(A) A complete description of the proposed modifications, including new language for any conditions that will be affected	Section 2.0—Proposed modifications Sections 3.1 to 3.15—Proposed changes to Conditions of Certification, if necessary, are located at the end of each technical section
(B) A discussion of the necessity for the proposed modifications	Section 1.3
(C) If the modification is based on information that was known by the petitioner during the certification proceeding, an explanation why the issue was not raised at that time	Section 1.3
(D) If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, an explanation of why the change should be permitted	Sections 1.4, 3.1 to 3.4
(E) An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts	Section 3.1 to 3.4
(F) A discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards;	Section 3.1 to 3.4

TABLE 1.1-1
Informational Requirements for Post-Certification Modifications

Section 1769 Requirement	Section of Petition Fulfilling Requirement
(G) A discussion of how the modification affects the public	Section 4.0
(H) A list of property owners potentially affected by the modification	Section 5.0
(I) A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings.	Section 6.0

1.2 Ownership of the Facility Property

WCE will own the WCEP, and is a wholly-owned subsidiary of Edison Mission Energy (EME). EME is an independent power developer, owner, and operator engaged in the business of owning or leasing, operating, and selling energy and capacity from electric power generation facilities.

1.3 Necessity of Proposed Changes

The Siting Regulations require a discussion of the necessity for the proposed revision to WCEP certification and whether the modification is based on information known by the petitioner during the certification proceeding (Title 20, CCR, Sections 1769 [a][1][B], and [C]). This Petition for Modification will modify the previous project layout to improve the arrangement of the facility equipment. The proposed changes are required for the following reasons and were a result of information obtained after certification:

- After meeting with the Los Angeles County Fire Department, it was determined that a fire truck turnaround circle is required on the west end of the property. Inclusion of the appropriately sized turnaround circle would leave insufficient space for the gas compressors in their current location. Therefore, WCE proposes to move the fuel gas compressor building to the east end of the facility.
- The cooling tower will be constructed on top of a large concrete basin that would be approximately 4 feet deep. However, during development of the site, it was discovered that an existing 60-inch-diameter storm drain ran directly under the previously sited cooling tower location. As a result, it would not be practical to construct the cooling tower and basin on top of the existing storm drain. Therefore, WCE proposes to move the cooling tower approximately 120 feet east of the previously sited location.
- A study was conducted by the Southern California Gas Company (SoCalGas) following the AFC certification. Based on the size requirements identified by SoCalGas, WCE proposes to locate the gas metering yard and filters adjacent to the SoCalGas yard on the east end of the site.

- WCE proposes to add a waste water storage tank near the far west end of the site. The waste water storage tank will be added to moderate the discharge of blowdown from the cooling tower to the 48-inch sewer trunk line.
- It was determined by further engineering analysis that the recycled chlorination tank would not be necessary. Therefore, WCE proposes to remove the recycled chlorination tank.
- WCE proposes the addition of five high-side electrical breakers to meet Southern California Edison's (SCE) and the California Independent System Operator (CAISO) electrical protection and metering requirements.

1.4 Consistency of Changes with Certification

The Siting Regulations also require a discussion of the consistency of the proposed project revision with the applicable laws, ordinances, regulations, and standards (LORS) and whether the modifications are based on new information that changes or undermines the assumptions, rationale, findings, or other basis of the final decision (Title 20, CCR Section 1769 [a][1][D]). If the project is no longer consistent with the certification, the Petition for Modification must provide an explanation why the modification should be permitted.

The proposed project revisions are consistent with all applicable LORS. This Petition for Modification is not based on new information that changes or undermines any basis for the final Decision. The findings and conclusions contained in the Commission Decision for WCEP (CEC, 2008) are still applicable to the project as modified.

1.5 Summary of Environmental Impacts

The CEC Siting Regulations require that an analysis be conducted to address the potential impacts the proposed modifications may have on the environment and proposed measures to mitigate any potentially significant adverse impacts (Title 20, CCR, Section 1769 [a][1][E]). The regulations also require a discussion of the impact of the modification on the facility's ability to comply with applicable LORS (Section 1769 [1][a][F]). Section 3.0 of this Petition for Modification includes a discussion of the potential environmental impacts associated with the modifications as well as a discussion of the consistency of the modification with LORS. Section 3.0 also includes updated environmental baseline information if changes have occurred since the AFC that would have a bearing on the environmental analysis of the Petition for Modification. Section 3.0 concludes that there will be no significant environmental impacts associated with implementing the actions specified in the Petition for Modification and that the project as modified will comply with all applicable LORS.

1.6 Conditions of Certification

The construction of the WCEP modifications identified in this petition would require no changes to the CEC Conditions of Certification as described in the Commission Decision for the WCEP.

1.7 References

California Energy Commission (CEC). 2008. Final Commission Decision on Walnut Creek Energy Park. California Energy Commission, Sacramento, California. February.

Walnut Creek Energy, LLC (WCE). 2005. Application for Certification for the Walnut Creek Energy Park. Submitted to the California Energy Commission. Submitted by Walnut Creek Energy, LLC, a wholly owned subsidiary of Edison Mission Energy.

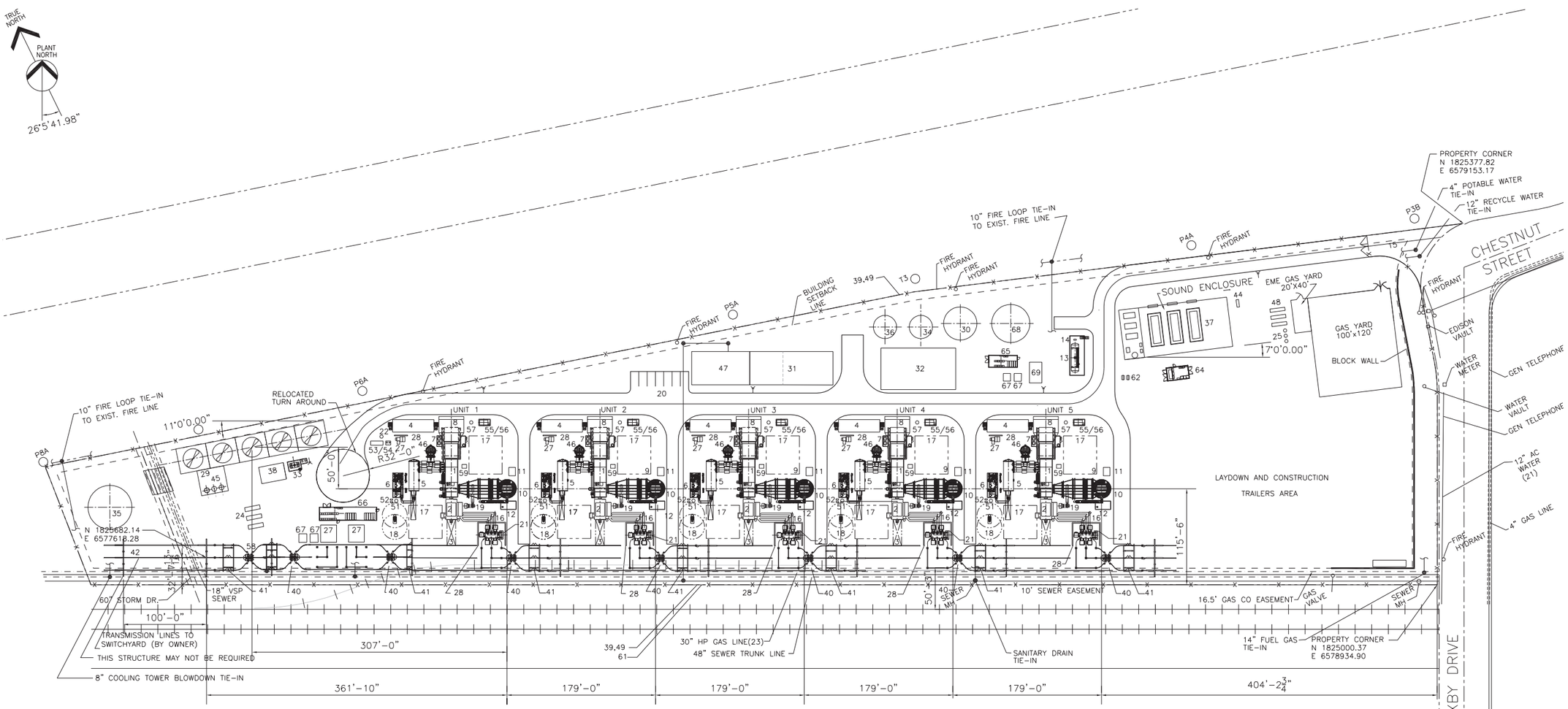
SECTION 2.0

Description of Project Modifications

This section includes a description of the proposed project modifications, consistent with CEC Siting Regulations (Title 20, CCR, Section 1769 [a][1][A]). Walnut Creek Energy, LLC proposes to modify the previous project layout to accommodate the development of the project and optimize the arrangement of the facility equipment. Figure 2.1-1a presents the revised general arrangement drawing. Figure 2.1-1b presents a comparison of the proposed modifications to the general arrangement drawing included in the AFC. Figure 2.1-2 shows the profile view (elevation) of the project design, as revised.

The following describes the proposed modifications. Numbers in parentheses are keyed to the legend in the General Arrangement drawings (Figure 2.1-1a).

- Per direction from the Los Angeles County Fire Department, a turnaround circle will be added to the end of the facility driveway at the northern end of the site. To make room for the turnaround circle, the gas compressor building (37) will be moved from the western end of the project site, near the power distribution center (66), to the eastern end of the project site.
- A gas metering yard and filters will be located adjacent to the gas company yard on the east end of the project site.
- The cooling tower (29) will be moved approximately 120 feet east of the location identified in the AFC.
- The wastewater storage tank (35) will be added to the far west end of the site. The tank will be located near the cooling tower location.
- The control building and the warehouse/maintenance building will be combined into one building (47 and 31).
- The recycled chlorination tank will be removed.
- Miscellaneous small equipment will be added (51 to 68).
- Five high-side electrical breakers (40) will be added along the southwest side of the site.



LEGEND:

1 COMBUSTION TURBINE
2 COMBUSTION TURBINE GENERATOR
3 COMBUSTION TURBINE GENERATOR ROTOR REMOVAL
4 COMBUSTION TURBINE POWER CONTROL MODULE (PCM)
5 COMBUSTION TURBINE INTERCOOLER
6 COMBUSTION TURBINE COOLING PUMP SKID
7 COMBUSTION TURBINE MECHANICAL AUXILIARY SKID
8 COMBUSTION TURBINE INLET AIR FILTER/EVAP COOLER
9 COMBUSTION TURBINE CO/SCR REACTOR
10 EXHAUST STACK
11 CEMS ENCLOSURE
12 AMMONIA BLOWER SKID
13 AQUEOUS AMMONIA STORAGE TANK
14 AQUEOUS AMMONIA FORWARDING PUMP SKID
15 ENTRANCE ROAD
16 ISOPHASE BUS
16A NOT USED
17 CRANE PARKING FOR TURBINE MAINT.
18 FUEL GAS FINAL FILTER
19 EXHAUST DUCT PURGE AIR FANS
20 PARKING
21 GENERATOR STEP-UP TRANSFORMER
22 OIL/WATER SUMP
23 30" GAS LINE (EXISTING)
24 CLOSED COOLING WATER HEAT EXCH.
25 FUEL GAS SCRUBBER (QTY 3)
26 NOT USED
27 AUXILIARY TRANSFORMER
28 FIRE WALL
29 COOLING TOWER
30 RECYCLE WATER STORAGE TANK
31 WAREHOUSE/SHOP
32 WATER TREATMENT/MECHANICAL AREA
33 SULFURIC ACID STORAGE TANK
34 TREATED WATER STORAGE TANK
35 WASTE WATER STORAGE TANK
36 DEMINERALIZED WATER STORAGE TANK
37 COMPRESSOR BUILDING
38 COOLING TOWER CHEMICAL FEED BUILDING
39 SECURITY FENCE
40 HIGH SIDE BREAKER (QTY 8)
41 AIR SWITCH (QTY 9)
42 TRANSMISSION POLE (INTERFACE POINT)
43 NOT USED
44 GAS HEATER
45 CIRCULATING WATER PUMP (QTY 3)
46 VENT STACK WITH SILENCER (VBV)
47 CONTROL/ADMIN BUILDING
48 FUEL GAS FILTER/SEPARATOR (QTY 3)
49 PROPERTY LINE
50 INTERMEDIATE TRANSMISSION STRUCTURE
51 INTERCOOLER DRAIN SURGE TANK
52 INTERCOOLER DRAIN WATER TRANSFER PUMPS
53 OIL WATER SEPARATOR
54 OILY WATER SUMP PUMP
55 WASTE WASH WATER TANK
56 CONCRETE VAULT
57 CTG RECOVERY DRAIN WATER SUMP
58 SITE MAIN BREAKER
59 CO2 FIRE SKID
60 NOT USED
61 UNION PACIFIC RR RIGHT OF WAY
62 CCW PUMPS
63 NOT USED
64 POWER DISTRIBUTION CENTER #1
65 POWER DISTRIBUTION CENTER #2
66 POWER DISTRIBUTION CENTER #3
67 STATION SERVICE TRANSFORMERS
68 FIRE WATER STORAGE TANK
69 FIRE WATER DIESEL PUMP SKID

COORDINATE SYSTEM IS:

NAD 83 CALIFORNIA STATE PLANES, ZONE V, FEET (CAB3-VF)

60 0 60 120
Scale: 1 INCH = 60 FEET

FIGURE 2.1-1A
Revised EME Walnut Creek Energy Park General Arrangement
Walnut Creek Energy Park Modification 1
Walnut Creek, California

Source: CH2M HILL Lockwood Greene, Dwg. No. P-1001, Rev. No. N

TRUE NORTH

PLANT NORTH

26°5'41.98"

KEY TO LAYOUT CHANGE:

MODIFIED OR RELOCATED

DELETED

SUMMARY OF MAJOR LAYOUT CHANGES:

Roadway revised at west end to allow space for equipment relocation and provide traffic turn-around.

(24)(29)(38)(45) Cooling tower shifted east, off existing underground pipe corridor, pump basin placed on long side.

(25)(37)(48) Natural Gas equipment and enclosure relocated east and north.

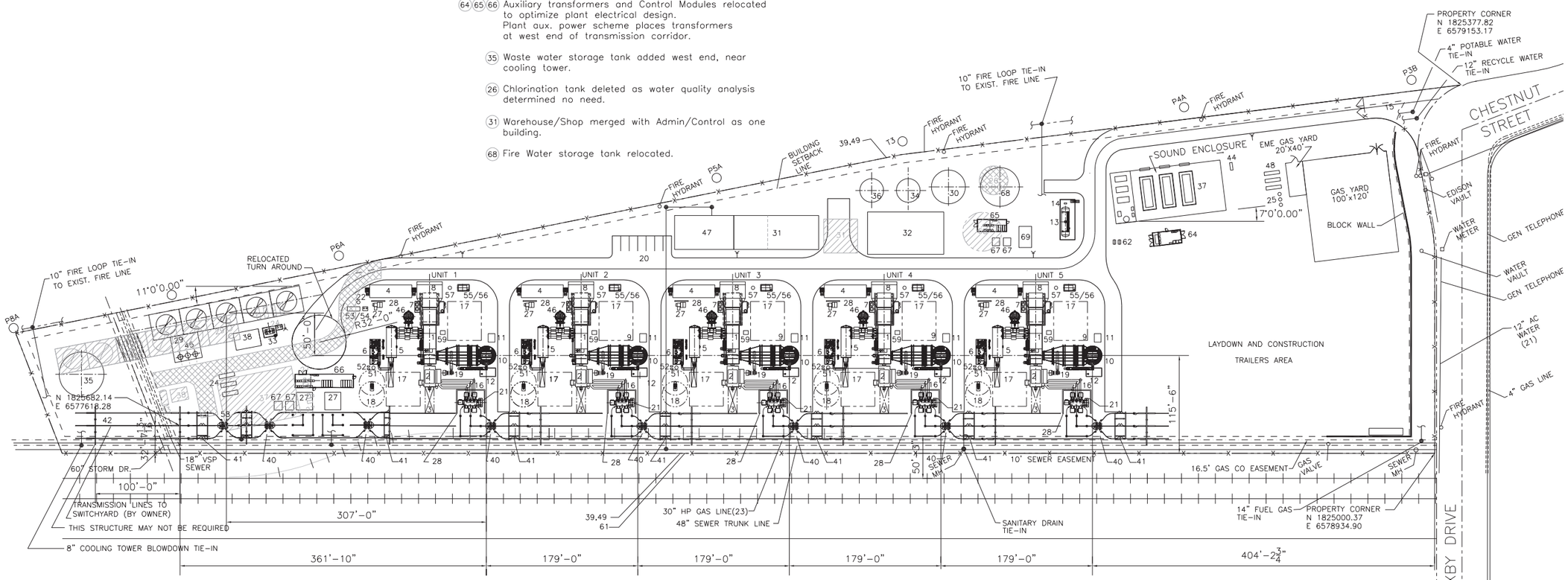
(64)(65)(66) Auxiliary transformers and Control Modules relocated to optimize plant electrical design. Plant aux. power scheme places transformers at west end of transmission corridor.

(35) Waste water storage tank added west end, near cooling tower.

(26) Chlorination tank deleted as water quality analysis determined no need.

(31) Warehouse/Shop merged with Admin/Control as one building.

(68) Fire Water storage tank relocated.



LEGEND: (CIRCLED ITEMS CHANGED IN LAYOUT)

1 COMBUSTION TURBINE
2 COMBUSTION TURBINE GENERATOR
3 COMBUSTION TURBINE GENERATOR ROTOR REMOVAL
4 COMBUSTION TURBINE POWER CONTROL MODULE (PCM)
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7 COMBUSTION TURBINE MECHANICAL AUXILIARY SKID
8 COMBUSTION TURBINE INLET AIR FILTER/EVAP COOLER
9 COMBUSTION TURBINE CO/SCR REACTOR
10 EXHAUST STACK
11 CEMS ENCLOSURE
12 AMMONIA BLOWER SKID
13 AQUEOUS AMMONIA STORAGE TANK
14 AQUEOUS AMMONIA FORWARDING PUMP SKID
15 ENTRANCE ROAD
16 ISOPHASE BUS
16A NOT USED
17 CRANE PARKING FOR TURBINE MAINT.
18 FUEL GAS FINAL FILTER
19 EXHAUST DUCT PURGE AIR FANS
20 PARKING
21 GENERATOR STEP-UP TRANSFORMER
22 OIL/WATER SUMP
23 30" GAS LINE (EXISTING)
(24) CLOSED COOLING WATER HEAT EXCH.
(25) FUEL GAS SCRUBBER (QTY 3)
(26) NOT USED
27 AUXILIARY TRANSFORMER
28 FIRE WALL
(29) COOLING TOWER
30 RECYCLE WATER STORAGE TANK
(31) WAREHOUSE/SHOP
32 WATER TREATMENT/MECHANICAL AREA
33 SULFURIC ACID STORAGE TANK
34 TREATED WATER STORAGE TANK
(35) WASTE WATER STORAGE TANK
36 DEMINERALIZED WATER STORAGE TANK
(37) COMPRESSOR BUILDING
(38) COOLING TOWER CHEMICAL FEED BUILDING
39 SECURITY FENCE
40 HIGH SIDE BREAKER (QTY 8)
41 AIR SWITCH (QTY 9)
42 TRANSMISSION POLE (INTERFACE POINT)
43 NOT USED
44 GAS HEATER
(45) CIRCULATING WATER PUMP (QTY 3)
46 VENT STACK WITH SILENCER (VBV)
47 CONTROL/ADMIN BUILDING
(48) FUEL GAS FILTER/SEPARATOR (QTY 3)
49 PROPERTY LINE
50 INTERMEDIATE TRANSMISSION STRUCTURE
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53 OIL WATER SEPARATOR
54 OILY WATER SUMP PUMP
55 WASTE WASH WATER TANK
56 CONCRETE VAULT
57 CTG RECOVERY DRAIN WATER SUMP
58 SITE MAIN BREAKER
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60 NOT USED
61 UNION PACIFIC RR RIGHT OF WAY
62 CCW PUMPS
63 NOT USED
(64) POWER DISTRIBUTION CENTER #1
(65) POWER DISTRIBUTION CENTER #2
(66) POWER DISTRIBUTION CENTER #3
67 STATION SERVICE TRANSFORMERS
(68) FIRE WATER STORAGE TANK
69 FIRE WATER DIESEL PUMP SKID

COORDINATE SYSTEM IS:

NAD 83 CALIFORNIA STATE PLANES, ZONE V, FEET (CAB3-VF)

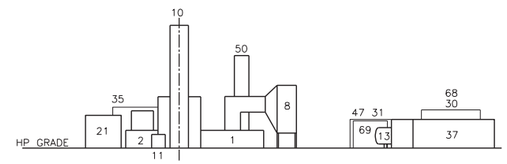
60 0 60 120
Scale: 1 INCH = 60 FEET

Source: CH2M HILL Lockwood Greene, Dwg. No. P-1001A, Rev. No. A

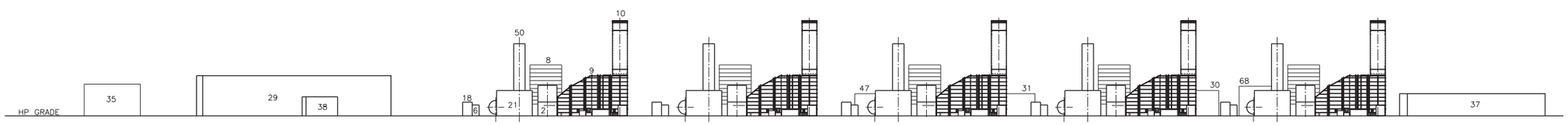
FIGURE 2.1-1B
Comparison of the Proposed EME Walnut Creek Energy Park (WCEP) General Arrangement to the EME WCEP AFC General Arrangement
Walnut Creek Energy Park Modification 1
Walnut Creek, California

LEGEND:

1	COMBUSTION TURBINE
2	COMBUSTION TURBINE GENERATOR
6	COMBUSTION TURBINE COOLING PUMP SKID
8	COMBUSTION TURBINE INLET AIR FILTER/EVAP COOLER
9	COMBUSTION TURBINE CO/SCR REACTOR
10	EXHAUST STACK
11	CEMS ENCLOSURE
13	AQUEOUS AMMONIA STORAGE TANK
21	GENERATOR STEP-UP TRANSFORMER
29	COOLING TOWER AND CIRCULATING WATER PUMPS
30	RECYCLED WATER STORAGE TANK
31	WAREHOUSE/SHOP
35	WASTE WATER STORAGE TANK
37	GAS COMPRESSOR BUILDING
38	COOLING TOWER CHEMICAL FEED BUILDING
47	CONTROL/ADMIN BUILDING
50	VBV STACK
68	FIRE WATER TANK
69	FIRE WATER DIESEL PUMP SKID



EAST ELEVATION



SOUTH ELEVATION

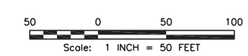


FIGURE 2.1-2
Revised EME Walnut Creek Energy Park Elevation Drawing
Walnut Creek Energy Park Modification 1
Walnut Creek, California

Source: CH2M HILL Lockwood Greene, Dwg. No. P-1002, Rev. No. B

SECTION 3.0

Environmental Analysis of Proposed Project Modifications

The proposed modifications to the Walnut Creek Energy Park would be limited to minor changes in the locations of several structures and auxiliary equipment within the existing property boundary. As a result, the environmental analysis for most of the environmental disciplines does not differ significantly from that described in the AFC, and the impacts associated with this Petition for Modification would be less than significant. The following environmental disciplines would not differ significantly from the AFC:

- Biological Resources
- Cultural Resources
- Geology and Paleontology
- Hazardous Materials Management
- Land Use
- Socioeconomics
- Soil and Water Resources
- Traffic and Transportation
- Waste Management
- Worker Safety and Fire Protection

For the remaining environmental disciplines, the changes within the existing property boundary pose the possibility of a change to the environmental analysis presented in the AFC. The following sections address the potential significance of changes that could result from the proposed general arrangement modifications. Each section includes a brief discussion of the environmental baseline, followed by a discussion of the environmental consequences of the modified project design, compared with those of the original design. The modifications do not require changes to the Conditions of Certification.

The environmental disciplines are addressed in alphabetical order, as follows:

3.1 Air Quality
3.2 Noise
3.3 Public Health
3.4 Visual Resources

3.1 Air Quality

This section presents the evaluation of emissions and impacts resulting from the proposed modifications to the general arrangement, as well as the proposed mitigation measures to be used to minimize emissions and impacts below established significance thresholds.

3.1.1 Environmental Baseline Information

This Petition for Modification does not require changes to the Environmental Baseline Information as described in the AFC for air quality. There have been no significant changes in ambient air quality or meteorological conditions since the AFC was filed.

WCE proposes to move the WCEP cooling tower approximately 120 feet to the east, which would place it closer to the LMS-100 turbines. To assess the potential for changes to the project air quality and health risk impacts, the new cooling tower location was analyzed with both the Industrial Source Complex Short Term Model (ISCST3) as well as the Hotspot Analysis Reporting Program (HARP). As part of the inputs into both models, the Building Profile Input Program (BPIP) was also used to calculate the revised structure dimensions based on the new location of the cooling tower. No other changes to emissions or source locations are proposed for the WCEP. The revised cooling tower location used in the ISCST3 dispersion modeling analysis is depicted in Figure 3.1-1.

3.1.2 Environmental Consequences

In order to determine the potential for a revised magnitude and location of the maximum impacts for each pollutant and averaging period, the ISCST3 model was used to directly compare the potential for changes. Based on output from BPIP, the revised cooling tower location will have minimal effect on the turbine's air quality impacts. Table 3.1-1 summarizes maximum-modeled concentrations for each criteria pollutant and associated averaging periods. The results of the modeling analysis demonstrate that the 1-hour and 8-hour carbon monoxide (CO) concentrations, as well as the annual nitrogen dioxide (NO_2) concentrations, would decrease with the proposed project modification. All other pollutants and averaging times would have the same impact as previously modeled in the AFC. Similarly, the turbine startup and commissioning activities would result in no changes to the modeled concentrations. Thus, for air quality impacts, no significant changes in air emissions impacts are expected to occur as a result of the change in the cooling tower location. A compact disc containing the modeling input/output files will be submitted under separate cover.

TABLE 3.1-1
Modeled Maximum Project Impacts

Pollutant	Averaging Time	Maximum Facility Impact (µg/m^3) Previous Impact is listed in ( )	Background (µg/m^3)	Total Impact (µg/m^3)	State Standard (µg/m^3)	Federal Standard (µg/m^3)
NO_2	1-hour	165.92 (165.92)	297	463	470	-
	Annual	0.804 (0.825)	67.9	68.7	—	100
SO_2	1-hour	2.71 (2.71)	52.4	55.1	650	—
	3-hour	2.56 (2.56)	52.4	55.0	—-	1300
	24-hour	0.856 (0.856)	23.5	24.4	109	365
	Annual	0.056 (0.056)	8	8	—	80
CO	1-hour	40.32 (43.35)	12,571	12,612	23,000	40,000
	8-hour	40.09 (40.29)	4,989	5,029	10,000	10,000
PM_{10}[a]	24-hour	6.77 (6.77)	164	171	50	150
	Annual[b]	0.573 (0.573)	58.1	58.7	30	—

Notes:
[a]Including cooling tower
[b]Annual Arithmetic Mean
Worst-case one-hour CO and NO_x impacts are dominated by the emergency equipment.
µg/m^3 = micrograms per cubic meter

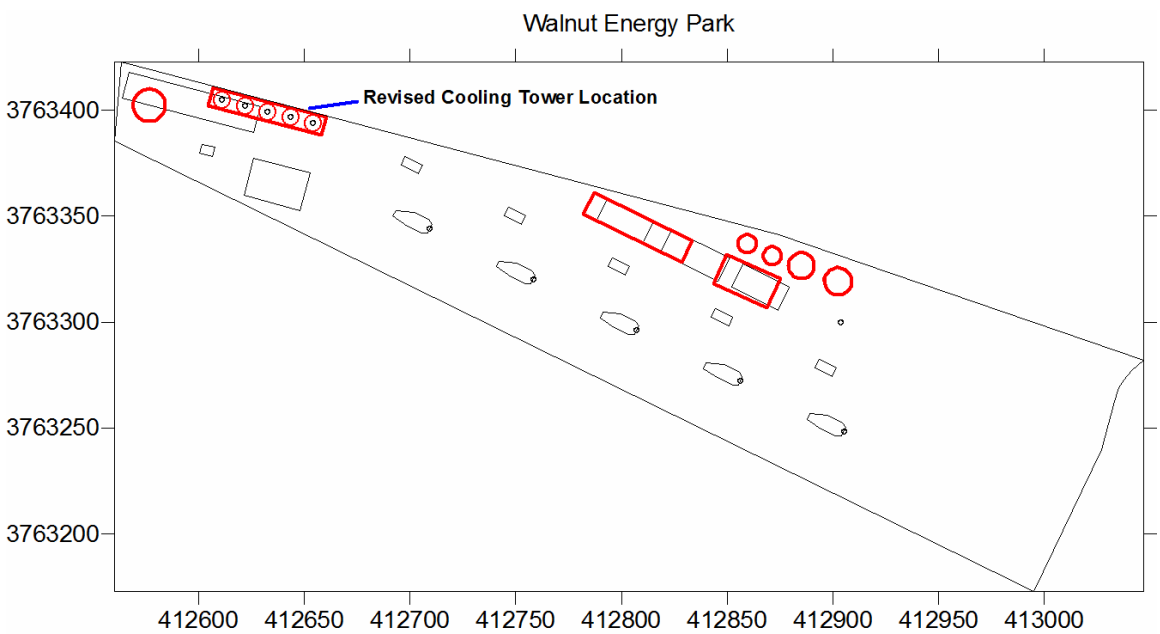


FIGURE 3.1-1
Revised ISCST3 Building Location Plot

3.1.3 Mitigation Measures

No additions to or changes to the mitigation measures are necessary for air quality, for this proposed modification.

3.1.4 Consistency with LORS

The construction and operation of the transmission line, as amended, will conform with all applicable LORS related to air quality.

3.1.5 Conditions of Certification

This Petition for Modification does not require changes to the Air Quality Conditions of Certification.

3.2 Noise

The relocation of the cooling tower and gas compressor station will cause no significant increase to the amount of noise generated by the WCEP.

3.2.1 Environmental Baseline Information

This Petition for Modification does not require changes to the environmental baseline information as described in the AFC. There have been no significant changes in the location of sensitive receptors or local development that would change the ambient noise environment.

3.2.2 Environmental Consequences

The proposed modifications will not create additional sources of noise. The cooling tower and gas compressor building currently represent two of the noise sources associated with the licensed project. Detailed design will ensure the noise emissions from these two relocated units comply with the existing offsite noise levels established in the Conditions of Certification. Therefore, the minor shift in the cooling tower location and the relocation of the gas compressors is not expected to result in significant changes in project noise levels at the residential receptor locations. The addition of the wastewater tank, the combination of the control building with the warehouse/maintenance building, the removal of the recycled chlorination tank, and the addition of five high-side electrical breakers are not expected to impact the noise levels identified in the AFC. Therefore, the proposed modifications will not cause a significant change in the noise impacts in the project vicinity.

3.2.3 Mitigation Measures

No mitigation measures are necessary for noise, for this proposed modification.

3.2.4 Consistency with LORS

The noise from the project, as modified, will remain below all applicable noise standards.

3.2.5 Conditions of Certification

The proposed modifications do not require changes to the Conditions of Certification for noise.

3.3 Public Health

3.3.1 Environmental Baseline Information

This Petition for Modification does not require changes to the Environmental Baseline Information as described in the AFC. There are no additional sensitive receptors in the project area and there have been no significant changes in terms of local development that would change the number of residents or workers affected by the project.

3.3.2 Environmental Consequences

The HARP health risk model was rerun for the proposed cooling tower location. As shown in Tables 3.3-1 and 3.3-2, no significant changes to the risk impacts are expected to occur. For the revised acute and chronic impacts, there is a slight increase, but in all cases, the resulting impacts would remain lower than significance levels. For cancer risk, there is a slight increase in the maximum exposed individual (MEI) resident while there is a slight decrease for the maximally exposed individual (MEI) worker. Therefore, there would be no significant change to the cancer risk at the MEI locations based on the revised cooling tower location. A compact disc containing the modeling input/output files will be submitted under separate cover.

TABLE 3.3-1
Revised Health Risk Assessment Results

Risk Parameter/Data	MIR/Max MEI	MEI Residential	MEI Worker
Receptor Name	MIR	Near Res	Near Work
Receptor HARP ID	SR017	SR031	SR032
Receptor Output ID	10282	10296	10297
Receptor UTM (meters)	413480/3764940	412423/3763083	413123/3763141
Cancer Risk	6.27 E-7	1.05E-8	1.92E-10*
Chronic HI	0.0125	0.00021	0.000015
Acute HI	0.0636	0.00116	0.000842

MIR = maximally impacted receptor; MEI = maximally exposed individual
*adjusted value based on the worker factor of 0.187 per the previous submittals dated 10-10-07 and 10-18-07.

TABLE 3.3.2
Original Health Risk Assessment Results

Risk Parameter/Data	MIR/Max MEI	MEI Residential	MEI Worker
Receptor Name	MIR	Near Res	Near Work
Receptor HARP ID	SR001	SR031	SR032
Receptor Output ID	10266	10296	10297
Receptor UTM (meters)	413480/3764940	412423/3763083	413123/3763141
Cancer Risk	6.27E-7	9.48E-9	1.98E-10*
Chronic HI	0.0124	0.000188	0.0000156
Acute HI	0.0635	0.00105	0.000879

*adjusted value based on the worker factor of 0.187 per the previous submittals dated 10-10-07 and 10-18-07.
MIR = maximally impacted receptor; MEI = maximally exposed individual

3.3.3 Mitigation Measures

The WCEP impacts on public health with the proposed modifications are less than significant, and will, therefore, not require additional mitigation measures.

3.3.4 Consistency with LORS

The construction and operation of the modified WCEP general arrangement will remain consistent with all applicable LORS related to public health.

3.3.5 Conditions of Certification

The proposed modifications do not require changes to the Conditions of Certification for public health.

3.4 Visual Resources

The Commission Decision determined that the WCEP project would not have significant impacts on visual resources. Under the proposed Petition for Modification, the project would relocate several of the structures within the facility boundary that would be visible at key observation point (KOP)-1 and KOP-3. However, the proposed modifications are not expected to have a significant impact on visual resources.

3.4.1 Environmental Baseline Information

This Petition for Modification does not require changes to the Environmental Baseline Information as described in the AFC. There have been no significant changes in terms of local development that would change the existing views.

3.4.2 Environmental Consequences

The potential impacts resulting from the relocation of the cooling tower and gas compressor building for each KOP are summarized below:

KOP-1: As described in the original AFC (WCE, 2005), portions of the cooling tower and the gas compressor building would be visible in the area behind the SCE transmission corridor, and several sets of stacks will be visible behind the transmission towers on the right side of the view. With the proposed modifications, the cooling tower would become slightly more visible but would remain behind an existing SCE transmission tower. The gas compressor building would be relocated to the eastern side of the site and would no longer be visible at KOP-1. Therefore, the visual character and quality of the view would not change significantly with the proposed modifications and would potentially be improved at KOP-1 as a result of the gas compressor building relocation.

KOP-2: As described in the AFC (WCE, 2005), the most prominently visible features would be the stacks and selective catalytic reduction (SCR) enclosures. The proposed modifications would not affect the visibility of the stacks and SCR enclosures, and would not increase the visibility of the facility from KOP-2. Therefore, there would be no change in the effect of the proposed project on the character or visual quality of the view as seen from the South Piermont Drive viewpoint.

KOP-3: As described in the AFC (WCE, 2005), the project would cause very little net change in the overall level of visual quality, despite the fact that most of the project's facilities will be visible from this area. The proposed modification would relocate the cooling tower and the gas compressor building. However, the change in location would not change the overall conclusion in the original AFC that the project would appear as an orderly complex of individual elements and that the project components are not dominant elements in the view. Therefore, the proposed modifications would not cause a significant change in the visual character or visual quality of the view from the Main Street location.

The remaining modifications to the general arrangement are also expected to have no impact on the overall visual character and quality at the KOPs.

3.4.3 Mitigation Measures

The impacts on visual resources as a result of the proposed modification to the WCEP general arrangement are less than significant, and will therefore not require additional mitigation measures.

3.4.4 Consistency with LORS

The proposed modification to the WCEP general arrangement will remain consistent with all applicable LORS related to Visual Resources.

3.4.5 Conditions of Certification

The proposed modifications to the WCEP general arrangement do not require changes to the Conditions of Certification for Visual Resources.

3.5 LORS

The Commission Decision certifying the WCEP project concluded that the project is in compliance with all applicable LORS. The project, as modified, will continue to comply with all applicable LORS.

SECTION 4.0

Potential Effects on the Public

This section discusses the potential effects on the public that may result from the modifications proposed in this Petition for Modification application, per CEC Siting Regulations (Title 20, CCR, Section 1769[a][1][G]).

No adverse effects on the public will occur because of the changes to the project as proposed in this Petition for Modification.

SECTION 5.0

List of Property Owners

This section lists the property owners in accordance with the CEC Siting Regulations (Title 20, CCR, Section 1769[a][1][H]). A list of property owners whose property is located within 1,000 feet of the proposed facility is included as an attachment. The list is provided in a format suitable for copying to mailing labels.

SECTION 6.0

Potential Effects on Property Owners

This section addresses potential effects of the project changes proposed in this Petition for Modification on nearby property owners, the public, and parties in the application proceeding, per CEC Siting Regulations (Title 20, CCR, Section 1769 [a][1][I]).

The project as modified will not differ significantly in potential effects on adjacent land owners, compared with the project as previously proposed. The project, therefore, would have no adverse effects on nearby property owners, the public, or other parties in the application proceeding.

Attachment

8242 001 018
ANTONIA GONZALEZ
16315 FOLGER ST
HACIENDA HEIGHTS CA 91745

8242 001 019
MAUNG G WIN
16321 FOLGER ST
HACIENDA HEIGHTS CA 91745

8242 001 020
DONALD V SHORKEY
16327 FOLGER ST
HACIENDA HEIGHTS CA 91745

8242 001 021
SHOU YING TSAI
16333 FOLGER ST
HACIENDA HEIGHTS CA 91745

8242 001 022
DALE D CUMMINGS TRUST
16339 FOLGER ST
LA PUENTE CA 91745

8242 001 023
CARLOS J & LUZ M MOSQUEDA
16345 FOLGER ST
HACIENDA HEIGHTS CA 91745

8242 001 024
JUAN & MARGARITA FIERRO
16351 FOLGER ST
HACIENDA HEIGHTS CA 91745

8242 009 001
HELEN HERNANDEZ
1104 FIELDGATE AVE
HACIENDA HEIGHTS CA 91745

8242 009 800,803,804, 8242 012 812,8242 013 822,823,841,842,8242 016 802, 806, 807, 814, 8242 028 800,801
SO CALIF EDISON CO
16408 GALE AVE
CITY OF INDUSTRY CA 91745

8242 011 045
JAMES N FRIZE TRUST
131 S EL DORADO LN
ANAHEIM CA 92807

8242 011 047
JACK L PERRIN TRUST
1020 BIXBY DR
CITY OF INDUSTRY CA 91745

8242 011 059
GALE JULIAN LLC
PO BOX 320099
ALEXANDRIA VA 22320

8242 013 002,003,004
CITY OF INDUSTRY
15625 STAFFORD ST #100
CITY OF INDUSTRY CA 91744

8242 013 803, 810, 828, 833, 834, 836, 837,838,8242 015 812,8242 016 808
SOU PAC CO S
16314 VALLEY BLVD
LA PUENTE CA 91744

8242 013 840
PAC TRANS CO SOU
1400 DOUGLAS ST STOP1640
OMAHA NE 68179

8242 013 900
L A CO FLOOD CONTROL DIST
500 W TEMPLE ST #754
LOS ANGELES CA 90012

8242 013 901
URBAN DEVELOPMENT AGENCY OF
15660 STAFFORD ST
CITY OF INDUSTRY CA 91744

8242 015 039,049,056
BEAR INVESTMENTS LLC
16150 STEPHENS ST
CITY OF INDUSTRY CA 91745

8242 016 023
SUBURBAN WATER SYSTEMS
1211 CENTER COURT DR
COVINA CA 91724

8242 016 058
VENUS FOODS INC
770 S STIMSON AVE
CITY OF INDUSTRY CA 91745

8242 016 061
ABI PROPERTIES LLC
935 LAWSON ST
CITY OF INDUSTRY CA 91748

8242 016 805, 8242 011 809
UNION PACIFIC R R CO
1400 DOUGLAS ST STOP1640
OMAHA NE 68179

8242 026 001
B & K ELECTRIC WHOLESALE
1225 S JOHNSON DR
CITY OF INDUSTRY CA 91745

8242 026 017
PAN AMERICAN CERAMICS
16610 GALE AVE
CITY OF INDUSTRY CA 91745

8242 026 018
FRANK E RAPER TRUST
2010 AINSLEY CT
CARMICHAEL CA 95608

8242 026 048
16500 GALE LLC
16500 GALE AVE
CITY OF INDUSTRY CA 91745

8242 026 049
JOHNNY LIN FAMILY TRUST
3408 S FLEMINGTON DR
WEST COVINA CA 91792

8242 028 001
CHIA DEVELOPMENT CORP
PO BOX 307
WILSONVILLE OR 97070

8242 028 002
KIM LIGHTING INC
584 DERBY MILFORD RD
ORANGE CT 06477

8242 028 003
CHIA DEVELOPMENT CORP
9450 SW COMMERCE CIR #110
WILSONVILLE OR 97070

8242 028 004
CORPORATE PROPERTY
ASSOCIATES 6
50 ROCKEFELLER PLZ #2FLR
NEW YORK NY 10020

8242 030 001
PHD PROPERTY
48900 MILMONT DR
FREMONT CA 94538

8242 030 002
EASTGROUP PROPERTIES L P
PO BOX 23636
JACKSON MS 39225

8242 030 003
HUI MARTIN CO TR
1239 OAKGLEN AVE
ARCADIA CA 91006

8242 030 004
CAST PARTS INC
PO BOX 2348
POMONA CA 91769

CH2M HILL
2485 NATOMAS PARK DR #600
SACRAMENTO CA 95833
ATTN KEITH MCGREGOR