



CITY OF
HAYWARD
HEART OF THE BAY

August 3, 2001

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Attention: Ms. Kae C. Lewis

DOCKET	
01-AFC-7	
DATE	AUG 03 2001
RECD.	AUG 08 2001

Dear Ms. Lewis:

Subject: City of Hayward Data Requests Related to Russell City Energy Center

The City of Hayward staff has reviewed the Application for Certification for the above project, as well as the California Energy Commission staff data requests that were issued on July 25, 2001. Enclosed you will find data requests for additional information that the City will need to fully assess the impacts of this project on City residents, businesses, resources, and infrastructure.

The data requests address the areas of air quality, biological resources, electrical transmission, facility closure, fire protection, hazardous materials, land use, natural gas supply, noise, project description, public health, socioeconomics, traffic and transportation, visual resources, waste management, water resources, and water supply. We are asking that the applicant be requested to provide a written responses to each item.

We appreciate your assistance in this matter. You may contact Alex Ameri at (510) 583-4720 if you have questions or need clarification regarding the data requests.

Sincerely,

Dennis Butler
Director of Public Works

Enclosure

cc: Jim Leahy, Calpine/Bechtel Joint Development

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Russell City Energy Center Data Requests

Technical Area: Air Quality
Author: Dyana Anderly, Planning Manager

BACKGROUND

In order to provide an adequate response to air quality issues, additional information must be provided.

DATA REQUEST

1. Show how emissions from the RCEC will/will not interface with emissions from nearby businesses.

Russell City Energy Center Data Requests

Technical Area: Biological Resources
Author: Dyana Anderly, Planning Manager

BACKGROUND

In order to provide an adequate response to biological issues, additional information must be provided.

DATA REQUEST

2. Show how structures will be designed to prevent raptors from perching on structures where there could otherwise easily prey upon nearby protected species.
3. Demonstrate how emissions (such as plumes) from RCEC will not interfere with wildlife.
4. Show how the loss of wetlands on the site will be mitigated.
5. Please indicate impacts and mitigation measures for impacts to migratory birds.

Russell City Energy Center Data Requests

Technical Area: Electrical Transmission
Authors: Dennis Butler, Director of Public Works
Larry Arfsten, Fire Chief

BACKGROUND

The alignment of the new high voltage overhead lines coming from the RCEC and connecting with existing PG&E towers on City property pass very close to the existing WPCF Administration building. This facility houses the WPCF's Supervisory Control, Alarming, and Data Acquisition (SCADA) system.

DATA REQUEST

6. Provide data on potential interference from the high voltage lines with the WPCF's SCADA system and other communication systems in the area.

BACKGROUND

The Application for Certification notes that fire hazards from the proposed transmission interconnection between RCEC and the existing electrical grid, as designed, constructed, and maintained, will be mitigated. PG&E will maintain the interconnection corridor and immediate area in accordance with existing regulations and accepted industry practices that will include identification and abatement of any fire hazards. (§6.4.4)

DATA REQUEST

7. Please provide examples of fire hazards associated with transmission interconnection and practices employed by PG&E to abate these hazards.

Russell City Energy Center Data Requests

Technical Area: Facility Closure
Author: Dyana Anderly, Planning Manager

BACKGROUND

In order to provide an adequate response to facility closure issues, additional information must be provided.

DATA REQUEST

8. What is the likelihood of temporary or permanent shutdown of RCEC, other than for maintenance, during the life of the plant.
9. If the above does occur, how will the facility be temporarily or permanently closed.

Russell City Energy Center Data Requests

Technical Area: Fire Protection
Author: Larry Arfsten, Fire Chief

BACKGROUND

The Application for Certification discusses Fire Protection (§2.2.12) and Fire Protection Systems (§2.2.17.2) during the operating phase of the project.

Fire protection during the construction phase of the project is not addressed in the Application, except under §8.16.12, Health and Safety Programs, in the chapter on Worker Health and Safety.

DATA REQUEST

10. Please provide a discussion, calculations, plans and other details on how the Russell City Energy Center (RCEC) will meet the 1998 California Fire Code and the Hayward Fire Department Development Standards.

Russell City Energy Center Data Requests

Technical Area: Hazardous Materials

Author: Larry Arfsten, Fire Chief

BACKGROUND

The Application for Certification gives an inventory of hazardous materials on site during the operating phase of the project, and the general location of each material within the facility. On another list, it gives the maximum quantity for each material and the hazardous characteristic of each (§8.5). Applicable hazardous materials permits and plans required for the project are listed in §8.5.7 of the Application.

Fire protection requirements and building occupancy classification are usually based not only on the manner of use or storage but also on the quantities of hazardous materials, by hazard class, and by control area as defined in the 1998 California Fire Code.

DATA REQUEST

11. Please provide an inventory of hazardous materials by control area, indicating the total quantity for each hazard class, based on the 1998 California Fire Code, the manner of storage (aboveground or underground), and the manner of use (closed or open) and taking into account multiple hazards for some hazardous materials. Include hazardous waste in the inventory of hazardous materials. Identify control areas for the AWT plant and control areas for the RCEC.
12. Please provide a similar inventory (as in 1 above) of hazardous materials on site during the construction phase of the project.
13. Please provide a discussion, calculations where required, plans, and other details on how the RCEC will meet the 1998 California Fire Code and other regulations pertaining to area-specific storage, use and handling of hazardous materials during the construction and the operating phases of the project, including permits, secondary containment, spill prevention and control, placarding and labeling
14. Please provide information on the nature of hazardous waste generated and stored on site, including estimated volumes.
15. Provide information on how a Risk Management Plan, under the State's CalARP Program, will be submitted for review and approval prior to start of construction.

**Russell City Energy Center
Data Requests**

Technical Area: Land Use
Author: Dyana Anderly, Planning Manager

BACKGROUND

In order to understand impacts during construction, additional information must be provided.

DATA REQUEST

16. Please provide a plan for the location and use of a staging area during the construction period.

Russell City Energy Center Data Requests

Technical Area: Natural Gas Supply
Author: Robert Bauman, City Engineer

BACKGROUND

Section 5.3 Construction Practices indicates that gas line excavated soil will be used for backfill. This is appropriate for dirt areas, but within City street sections, backfill must be consistent with City standards.

DATA REQUEST

17. Show that gas line backfill will satisfy City Standard Detail SD-310 which requires Class 2 aggregate base rock to within 1 foot of pipeline. Show how excavated material will be disposed of.

BACKGROUND

Section 5.7 indicates that the route of gas line includes part of City sewer easement across private property (Berkeley Farms).

DATA REQUEST

18. Request drawing showing exactly how the gas line will be constructed in the easement and still permit future access to the City's sewer line for maintenance.

BACKGROUND

Section 5.0 addresses the construction of the natural gas pipeline, which is expected to occur concurrently with expansion construction at the WPCF.

DATA REQUEST

19. Discuss how construction of the pipeline along Enterprise Avenue will impact WPCF operations and expansion. How will impacts be mitigated.

**Russell City Energy Center
Data Requests**

Technical Area: Noise
Author: Dyana Anderly, Planning Manager

BACKGROUND

In order to provide an adequate response to noise issues, additional information must be provided.

DATA REQUEST

20. Please show anticipated noise levels at the property line as well as existing noise levels.
21. Please provide a noise study which reveals noise impacts over a 24-hour period and indicate the anticipated highest single event noise level. Demonstrate impacts on adjacent businesses. Noise study must address noise levels during construction and post construction.

Russell City Energy Center Data Requests

Technical Area: Project Description
Author: Dennis Butler, Director of Public Works

BACKGROUND

Section 2.3 describes the design and operation of the Advanced Water Treatment (AWT) facility to supply the RCEC with treated wastewater for cooling and process make-up water in accordance with Title 22 requirements. The City of Hayward will be the owner/operator of the AWT facility after it is constructed. In order to adequately formulate a plan for efficient and reliable operation and maintenance of this facility, additional information is needed.

DATA REQUEST

22. Discuss how AWT will impact the certification requirements for the City's Water Pollution Control Facility and the operators.
23. Clarify approvals needed by outside federal, state, and local agencies to operate the AWT facility.
24. Provide proposed architectural details of AWT facilities.
25. Due to its proximity to the Hayward Fault, the City of Hayward has higher seismic standards than are in the current Uniform Building Code. Discuss plans to incorporate Hayward standards into the AWT design.

BACKGROUND

Section 2.3 of the AFC states that in the case of interruption of supply or short-term upsets, a backup supply is required.

DATA REQUEST

26. Define specifically in terms of water quality parameters and duration what "short-term upsets" would cause the RCEC to require the AWT facility to process water from another source.

BACKGROUND

In Section 2.3 of the AFC, it is stated that stormwater will be directed to the WPCF headworks. It is also stated that the design objective is 2.6 mgd. That volume (which appears to be off by an order of magnitude) would consume fully

Russell City Energy Center Data Requests

5 percent of the peak wet weather flow capacity for the planned 2010 facilities for this treatment plant.

DATA REQUEST

27. Doesn't the calculated 2.6 mgd of stormwater seem excessive? Please check these calculations.
28. If your check confirms that this is the required capacity, Calpine would be required to flow equalize this stormwater flow to reduce its impact.

BACKGROUND

The production of water of sufficient quantity and quality to meet power plant requirements is an essential feature impacting the reliability of this treatment facility. In Section 2.3.1.3, the MF/RO system technology is described. This technology, while present in other applications has been subject to continuing development and the application of current designs of MF and RO units to wastewater reuse applications is relatively new. On page 2-34 it is stated that "a safety factor" has been included in the MF design and on page 2-37 it is stated that four 33 percent capacity units will be provided. Each of these implies an assessment of reliability and redundancy on the part of the designer.

Statistical assessments can be made of the availability of treatment units based upon their operating histories. Such an analysis was done as part of health studies for a potable reuse reclamation project by Oliveri and Associates for a health assessment task force on that project.

DATA REQUEST

29. Please provide a discussion of AWT facility reliability and redundancy features for all the unit processes comprising the facility.
30. Where possible, based upon statistical analysis of similar facilities, estimate statistically the availability of the units in the AWT facility.
31. If a statistical analysis is not possible due to data availability, please compare the provisions made for redundancy and reliability made for this project and similar facilities.

**Russell City Energy Center
Data Requests**

Technical Area: Public Health
Authors: Alex Ameri, Deputy Director of Public Works

BACKGROUND

The sensitive receptor list located in Section 8.9 is limited to convalescent and nursing homes.

DATA REQUEST

32. Please provide a comprehensive list of sensitive receptors that includes residences, day care facilities, and other specific facilities, such as the Hayward Shoreline Interpretive Center.

BACKGROUND

According to section 8.9.2.6. of the AFC, the project will store hazardous materials at the site.

DATA REQUEST

33. Please submit a plan detailing the notification and evacuation system in the event of the release of hazardous materials into the surrounding environment.
34. Please submit detailed evacuation plan for workers and surrounding area employees in the event of a hazardous materials release.

Russell City Energy Center Data Requests

Technical Area: Socioeconomics
Authors: Dyana Anderly, Planning Manager
Larry Arfsten, Fire Chief

BACKGROUND

In order to provide an adequate response to socioeconomic issues, additional information must be provided.

DATA REQUEST

35. Please show how traffic and parking impacts during the construction phase of the RCEC will impact surrounding businesses and be mitigated.
36. Demonstrate the impacts of the use of the rail spur on local traffic and businesses.
37. Please note that there are no vacant RM or mobile home spaces in the area.

BACKGROUND

The Application for Certification notes that the City of Hayward, which has an ISO Fire Rating of 3, has 6 fire stations, 8 engine companies, and 2 truck companies. The closest fire station to the project site is Fire station No. 6, located approximately 2 miles from the site on West Winton Avenue. (§8.10.1.5)

(Note: The Hayward Fire Department has 9 fire stations and 9 engine companies.)

It goes on to say that during construction, the demand for fire services, only needed in cases of emergency, will not be significant because such emergencies will be rare. (§8.10.2.3)

Once operational, the Application also maintains that the HFD's ISO rating of 3 means that it will be able to sufficiently handle any increased activity resulting from the RCEC. (§8.10.2.3)

DATA REQUEST

38. Please provide information, historical and statistical, that will support the conclusion that emergency cases during construction will be rare.

**Russell City Energy Center
Data Requests**

39. Please provide information, historical and statistical, that will support the conclusion that RCEC, once operational, will not cause a significant additional demand on fire services.

BACKGROUND

In order to better assess the economic impacts and benefits of the project, please provide the following information:

DATA REQUEST

40. Will the applicant reimburse the City for the cost of the emergency response relating to Fire, Hazardous Materials, and/or any plant operations?
41. How will the applicant address impacts associated with noise and vibration on businesses, residences and other facilities that may be impacted by the plant?
42. Will the applicant develop a program for the handling of citizen complaints (e.g. establishment of a complaint hotline)?
43. The AFC fails to identify the business license tax structure for the project. Please identify the appropriate business license tax structure for the RCEC.

BACKGROUND

The expedited process of the RCEC will place an extraordinary burden on local government resources, including but not limited to, legal, fire, police, and public works resources.

DATA REQUEST

44. Will the applicant enter into reimbursement agreements with the City of Hayward and other local agencies to assure that they are reimbursed for their direct costs related to the processing of the RCEC project?

Russell City Energy Center Data Requests

Technical Area: Traffic and Transportation
Author: Dan Collins, Transportation Development Manager

BACKGROUND

Section 8.12.4.2 discusses off-site construction phase parking

DATA REQUEST

45. Provide details of off-site construction phase parking, shuttle busing, and the traffic impacts thereof.

BACKGROUND

Section 8.12.2 on Page 8.12-15 underestimates the percentage of a.m. peak hour car and truck traffic during construction.

DATA REQUEST

46. The assumption that 16% of cars and 10% of trucks during construction arrive during peak periods is probably in error. Due to construction workers and equipment preponderance of arrival near 7:00 a.m., a more reasonable assumption for percentages would be higher during the a.m. peak, such as 80%. The traffic analysis and accompanying tables and figures should be corrected accordingly.

BACKGROUND

Table 8.12-2 is erroneously labeled and omits level of service and delay information for two intersections.

DATA REQUEST

47. Table 8.12-2 is erroneously labeled "...planned improvements." However, this table merely portrays Circulation Element "Level of Service" (LOS) and delay for the future year. It assumes no planned improvements at the study intersections, except at the Clawiter intersections with the Route 92 ramps.
48. Table 8.12-2 states that these intersections are "n/a" for 2010. However, the Clawiter/WB 92 ramp will be signalized and the Clawiter/EB 92 ramp may be signalized if the Clawiter/Whitesell Interchange is constructed. In any case, after construction and future year delay and LOS should be calculated and provided for both of these intersections.

**Russell City Energy Center
Data Requests**

Technical Area: Visual Resources
Author: Dyana Anderly, Planning Manager

BACKGROUND

In order to provide an adequate response to visual issues, adequate plans must be provided.

DATA REQUEST

49. Please provide a detailed site plan, using the scale of 1:20.
50. Please provide a landscape plan that meets the City of Hayward's landscape guidelines.
51. Provide detailed elevations of all sides of all structures using the scale of 1:1/8, signs, and fencing, and details of the "wave."
52. Please show how tanks and extraneous equipment will be screened.
53. Provide computer simulations of project from critical viewing points, e.g., Hayward-San Mateo Bridge toll plaza, shoreline, Enterprise Avenue, Johnson Road, and the proposed Bay Trail overcrossing.
54. Provide a lighting plan that demonstrates that light and glare will not interfere with aircraft or unnecessarily illuminate the area as seen from critical viewpoints.

BACKGROUND

In order to insure that the power plant meets requirements of the Zoning Ordinance and other officially adopted policies, plans should be provided that demonstrate that they are met.

DATA REQUEST

55. Show that decorative fencing is located behind landscaping on Enterprise and Whitesell Avenues so that landscaping along right-of-ways is attractive.
56. Show that landscaping is within at least a 20-foot setback along rights-of-way and is adequate along other property lines to accommodate large plans and to adequately screen and soften aspects of the RCED.
57. Show that the ancillary structures architecturally meet City Architectural Design Guidelines.

Russell City Energy Center Data Requests

Technical Area: Waste Management
Authors: Larry Arfsten, Fire Chief
Vera Dahle-Lacaze, Solid Waste Manager

BACKGROUND

The Application for Certification refers to a Phase I Environmental Site Assessment (ESA) performed in March 2001 for the RCEC and AWT plant site (§8.14.1). The investigation identified two contiguous sites that are in the State's List of Contamination Sites.

DATA REQUEST

58. Provide a closure plan for the facilities of Runnels Industries that would conform with applicable laws, ordinances, regulations and standards.
59. Address the issue of obtaining a health-based clearance for the entire project site prior to start of construction.

BACKGROUND

AFC Section 8.14.2.2 - Operation Phase provides a description and total estimated quantities of non-hazardous solid waste generated during operation of the RCEC plant and AWT plant. In order to comply with state mandates regarding reducing waste disposed, businesses within the City of Hayward are required to divert via recycling or salvaging at least 50% of its non-hazardous wastes.

DATA REQUEST

60. Please provide a statement of intention to comply with the City's Construction and Demolition Debris Recycling Ordinance and the City's on-site recycling requirements.
61. Please provide specific arrangements to ensure that dewatered sludge is put to beneficial use, rather than disposed of in a landfill, as proposed in Section 8.14.2.2, so as not to add to the City's annual solid waste disposal tonnage.

BACKGROUND

Section 8.14.2.1 Construction Phase indicates that some hazardous solid waste such as welding materials and dried paint may be generated.

**Russell City Energy Center
Data Requests**

DATA REQUEST

62. Please provide information indicating estimated quantities and types of Special Waste (as defined in Article 3.0, Section 18720 (a)(73) of the California Integrated Waste Management Board Regulations) that may be generated and the facility that will be accepting all of the Special Wastes.

Russell City Energy Center Data Requests

Technical Area: Water Resources
Authors: Dennis Butler, Director of Public Works

BACKGROUND

Section 8.15.2.5 identifies that process area drainage will go to a stormwater holding tank for subsequent discharge to the City's WPCF influent.

DATA REQUEST

63. Identify the criteria which will be used to establish the areas to be defined as process areas.
64. Identify the criteria which will be used to exclude from the process areas the maximum amount of rainfall so as to minimize hydraulic loading to WPCF influent.
65. Based upon the above and in consideration of sizing for a 25-year storm event, identify the size of the holding tank to be provided.

Russell City Energy Center Data Requests

Technical Area: Water Supply
Author: Dennis Butler, Director of Public Works

BACKGROUND

Section 7.3 describes wastewater collection, treatment and disposal. The effluent from the AWT and the RCEC could have a significant impact on the operation of the Water Pollution Control Facility and its ability to meet current and future discharge limits.

DATA REQUEST

66. Verify and quantify the impact of the AWT and RCEC discharge on the City's current discharge limits and current effluent quality, including a list of facility wastewater discharges, estimated quantities, and concentrations of various constituents.
67. Provide a statement that the Applicant will be fully responsible for meeting and satisfying any and all requirements of the San Francisco Bay Area RWQCB related to the quality of the proposed discharge from the AWT facility.

BACKGROUND

The discussion in Section 7.3 and the data in Table 7-3 implies that the basis for judging success of the post treatment facilities is judged by the water quality of the combined Hayward WPCF and RCEC AWT facility effluent.

DATA REQUEST

68. Please provide the background and latest water quality data and calculations relative to the quality of the RCEC AWTF effluent in comparison to EBDA discharge parameters, as well as the proposed combined effluent of the RCEC AWT plus the existing Hayward effluent in comparison to EBDA discharge parameters.