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**Response to Data Requests  
1 through 97**

In support of the

**Application for Certification**  
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



With Technical Assistance by:



Sacramento, California  
April 2006

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# Introduction

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Attached are Walnut Creek Energy, LLC's (WCE's), responses to California Energy Commission (CEC) Staff data requests numbers 1 through 97 for the Walnut Creek Energy Park (WCEP) (05-AFC-02). The CEC Staff served these data requests on March 10, 2006, as part of the discovery process for the WCEP project. The responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as CEC Staff presented them and are keyed to the Data Request numbers (1 through 97). New or revised graphics or tables are numbered in reference to the Data Request number. For example, the first table used in response to Data Request #15 would be numbered Table DR15-1. The first figure used in response to Data Request #28 would be Figure DR28-1, and so on. This set of responses incorporates an exception to this rule for Figures 8.13-2, -3, and -4 (see Visual Resources and Data Request #88). These figures have the same numbers as in the Application for Certification (AFC) because we are providing an enlarged print of the same figures from the AFC, and not a revision of those figures.

Other supporting information in response to a data request (supporting data, stand-alone documents such as plans) is found at the end of a discipline-specific section as numbered attachments. These additional pieces of information are not sequentially page-numbered consistently with the remainder of the document, but may have their own internal page numbering system.

# Air Quality (1-42)

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## Carbon Monoxide Re-Designation

1. *Please provide a status report of the CO re-designation at the District, California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (USEPA), and the dates and a schedule of critical milestones (e.g., resolution to proceed with the request by the District Governing Board, the District re-designation request to CARB, the re-designation request from CARB to the USEPA, and a decision by the USEPA).*

**Response:** A representative of WCE met with USEPA on March 1, 2006, to indicate support for the re-designation request, and inquire about the status of the request. At this time, the District and CARB have submitted to USEPA all the information that USEPA believes is required for it to proceed with approval of the re-designation request. The final submittal from CARB to USEPA occurred on March 2, 2006. Our understanding is that USEPA is finalizing its review of the re-designation request, and commencing the rulemaking process, which will include publication of a proposed rulemaking in the Federal Register, solicitation and response to comments, and publication of a final rulemaking in the Federal Register. This process is expected to take a minimum of six months. We suggest that Staff, as a sister agency, request periodic status reports on the re-designation directly from CARB. WCE appreciates any updates from Staff regarding this issue.

## Emission Reduction Credits

2. *Please identify ERCs owned by the applicant or any affiliate that the District might require to be surrendered as a condition for participation in the Priority Reserve. Please include the ERC number, the pollutant type and amount in pounds per day, and ERC source location and name.*

**Response:** At this time, WCE has not reached any agreement with sellers of Emission Reduction Credits (ERCs) for any pollutant proposed to be included in the District Priority Reserve rulemaking. However, we urge Staff to rely on the Preliminary Determination of Compliance (PDOC), which will demonstrate how the WCEP would comply with all District Rules including those requiring offsets.

## Option Contracts

3. *Please provide option contracts and/or evidence of acquisition of ERCs for the CO, SO<sub>x</sub>, VOC, and PM<sub>10</sub> liability of the project.*

**Response:** At this time, while WCE has continued to pursue negotiations for ERCs, no agreements have been reached. See Response to Data Request #2 above.

## Status Report

4. *If the applicant is unable to adequately respond to the Data Request above, please provide a status report starting May 1, 2006 and continuing monthly until the report identifies option contracts and/or evidence of acquisition of ERCs for the CO, SO<sub>x</sub>, VOC and PM<sub>10</sub> liability of the project, or the start of the project Air Quality Evidentiary Hearings. The report should be*

*specific to each pollutant and provide new information and update information from previous monthly status reports as appropriate. The reports should include:*

- a. contact names and telephone numbers;*
- b. company or source names;*
- c. pollutant credit types and amounts in pounds per day (lbs/day);*
- d. ERC certificate numbers;*
- e. the methods of emission reductions (e.g., shutdown, reduction of hours of operation, emission controls, etc.);*
- f. the status of ERC or option negotiations;*
- g. prices or potential prices; and,*
- h. the location of the emission reduction credits.*

**Response:** WCE will prepare the status reports as requested; however, WCE will not provide information on prices or potential prices (Item g) as such prices will be confidential and not relevant to an independent evaluation by Staff.

## Priority Reserve

5. *Please provide a status report starting May 1, 2006 and continuing monthly until the rule is revised and adopted by the District Board and the District has approved the project's participation in the Priority Reserve under the revised rule, or until the start of the project Air Quality Evidentiary Hearings. The report should provide new information and update information from previous monthly status reports, and include:*
  - a. any additional rule changes and revisions needed to enable the applicant to qualify and participate in a revised Priority Reserve program, and that ensure sufficient quantities of credits are in the program;*
  - b. steps that the applicant will take to meet the proposed revised rule requirements, including*
    - i. all existing stationary sources under common ownership (applicant and any affiliate identified by the District) will meet Best Available Retrofit Control Technology (BARCT) and will comply with Section (c)(1) of Rule 1309.1.*
    - ii. that the applicant has satisfied the due diligence requirement of Section (c)(3) of Rule 1309.1;*
    - iii. that the applicant will satisfy the 1.2 to 1.0 offset ratio requirement of Section (c)(4) of Rule 1309.1;*
    - iv. that the project will be fully and legally operating within 3 years of a District Permit to Operate or Commission Decision, pursuant to Section (c)(5) of Rule 1309.1; and*
    - v. the status of negotiations for power sales contracts with the State of California pursuant to Section (d)(1) of Rule 1309.1.*

**Response:** WCE will file the status report requested. However, it should be noted that Staff has listed items to be included in the status report using the current revision to amend Rule 1309.1. If the revision is further modified, WCE will tailor its status report accordingly. Additionally, the District will be the agency charged with making the demonstration that WCE is qualified to participate in its Priority Reserve program. We anticipate that such demonstration will be contained in the District's Determination of Compliance.

### Fine Particulate Matter (PM<sub>2.5</sub>) Mitigation

6. *Please provide proposal(s) to mitigate the facility's potentially significant PM<sub>2.5</sub> impacts.*

**Response:** WCE believes that participating in the Priority Reserve will mitigate any potentially significant PM<sub>2.5</sub> impacts.

### Priority Reserve for PM<sub>2.5</sub> Mitigation

7. *Please discuss changes in the Priority Reserve necessary to ensure that PM<sub>2.5</sub> emission reduction credits will be identifiable and available to mitigate project PM<sub>2.5</sub> emissions.*

**Response:** WCE is unaware of any changes in the Priority Reserve program relating to PM<sub>2.5</sub> emission reduction credits.

### Sulfur Oxides (SO<sub>x</sub>) RECLAIM Status Report

8. *Please provide a status report, starting May 1, 2006 and continuing monthly until the start of the project Air Quality Evidentiary Hearings, regarding the petition or potential petition that the applicant has filed with the District to participate in the SO<sub>x</sub> RECLAIM program that includes:*

- a. *the petition itself and supporting documentation that the applicant filed with the District; and,*
- b. *a schedule for review and decision by the District of the application for participation in SO<sub>x</sub> RECLAIM.*

**Response:** WCE will provide the status report requested.

### SO<sub>x</sub> RECLAIM Trading Credits

9. *Please provide a list of RECLAIM SO<sub>x</sub> trading credits that the applicant already owns or has under option contract.*

**Response:** WCE does not currently own or have RECLAIM SO<sub>x</sub> trading credits under option contract.

### Oxides of Nitrogen (NO<sub>x</sub>) RECLAIM Credits

10. *Please provide a list of NO<sub>x</sub> RECLAIM trading credits (RTCs) that the applicant owns or has under option contract.*

**Response:** WCE does not currently own or have NO<sub>x</sub> RECLAIM trading credits under option contract.

## NOx RECLAIM Credit Costs

11. *Recent revisions to NOx RECLAIM will reduce NOx RECLAIM trading credits by about 15 percent and probably increase prices from existing levels. Please discuss how the changes to the NOx RECLAIM market would affect the ability of the applicant to purchase sufficient quantities of NOx RECLAIM trading credits.*

**Response:** The adjustment to NOx RECLAIM trading credit (RTCs) allocations, adopted by the District Governing Board on January 7, 2005, is phased in over a five-year period. Aggregate 2007 allocations are reduced by 4 tons per day, and aggregate allocations for the years 2008-2011 are reduced by 0.925 tons per day each year. These reductions have already been implemented, and are reflected in current allocations. The reductions do not appear to have had any significant impact on the market for NOx RTCs, and WCE does not believe that the reductions will affect the ability of WCE to acquire sufficient quantity of NOx RTCs to comply with District rules for the WCEP.

## Local Mitigation Opportunities

12. *Please investigate and report on the potential for local emission reductions and mitigation measures.*

**Response:** There is currently a disincentive to embark upon a project to investigate and develop local emission reductions and mitigation measures because, while WCE is interested, such novel offsetting approaches typically take significant amounts of time to acquire agency approval. Since the WCEP is responding to the predicted shortage of peaking power in Southern California, time delays in overcoming the regulatory burdens associated with developing emission reductions that are not already banked is not feasible. However, if the Staff knows of any local emission reductions that could be developed that are cost effective and would not cause time delay in obtaining agency approval, WCEP will consider them.

## Maximum Hours of Operation per Year

13. *Please clarify the maximum number of hours per year the applicant proposes to operate the facility (including startup and shutdown).*

**Response:** The emissions calculations are based on 3,468 hours of operation, which also includes startup and shutdown. However, the Applicant will request that the permitted emissions limits be based upon total emissions rather than hours of operation.

## Maximum Hours of Operation per Day

14. *Please clarify the maximum number of hours per day the proposed facility would operate.*

**Response:** The plant can operate 24 hours per day. From an emission prospective, continuous operation for 24 hours per day produces fewer emissions than the permitted profile of 22 hours of base load with 1.5 hours (approximately) of startup/shutdown.

## Permit Limits on Hours

15. *Because this project is projected to operate significantly less than the maximum potential hours on an annual basis (8,760 hours), please clarify if the applicant expects any permit limits on the number of hours the facility may operate during any period (daily, monthly, or annually).*

**Response:** WCE expects that the South Coast AQMD will place conditions on the facility permit, which will limit emissions of VOC, PM<sub>10</sub>, and CO on a monthly basis, and for NO<sub>x</sub> and SO<sub>x</sub> on an annual basis. These limits will not be based upon hours of operation. As stated in response #13, WCE will propose that the emission limits be based on actual emissions rather than hours of operation. The SCAQMD permit will limit operation of the facility through the use of hourly, monthly, and annual emission limits.

## Permit Limits on Startup Events

16. *Please clarify if the applicant expects permit limits on the number of startup events during any period (daily, monthly, or annually).*

**Response:** WCE does not expect that the South Coast AQMD will condition the applicable permits with limits that specify the number of startup or shutdown events in any time frame period.

## Startup Duration

17. *Table 8.1A-2a (Appendix 8.1A) lists the assumption that the startup duration is 35 minutes per event, and that the shutdown duration is 11 minutes per event. Manufacturer documentation for the LMS100 turbine indicates the potential for startup times as short as 10 minutes. Please explain why a shorter startup duration is not used in the calculations, per manufacturer documentation.*

**Response:** The 10-minute startup time, as presented in the manufacturer's documentation, does not include the use of an SCR or CO Catalyst. A 35-minute time period was used in order to bring these control devices up to the proper operating temperature.

## Startup Emissions

18. *Please provide assumptions and calculations used to derive the turbine startup emissions for NO<sub>x</sub>, CO, and VOC of 7, 15.4, and 2.1 lbs/event, respectively.*

**Response:** The startup emissions were based on data provided by GE Energy. This data represents margined average engine emissions, not guarantees. Thus, to account for potential worst-case, these average emissions were margined by 40 percent. For example, the GE start emission for NO<sub>x</sub> is 5 lb/start was adjusted by 40 percent to produce 7 lb/start. For CO, the average GE start emission is 11 lb/start, which was margined by 40 percent to 15.4 lb/start. VOC emissions were also margined by 40 percent to go from 1.5 lb/start to 2.1 lb/start.

## Shutdown Emissions

19. Please provide assumptions and calculations used to derive the turbine shutdown emissions for NO<sub>x</sub>, CO and VOC of 4.3, 18.2, and 1.6 lbs/event, respectively.

**Response:** As with response #18, the emissions for shutdown were provided by GE as margined average engine emissions, and are not guaranteed. Here, a 7 percent margin was added to the GE Energy-provided shutdown emissions. Thus, for NO<sub>x</sub>, the average shutdown emission of 4 lb/shutdown was adjusted by 7 percent to produce 4.3 lb/shutdown. For CO, the 17 lb/shutdown was adjusted to 18.2 lb/shutdown. Similarly with VOC at 1.5 lb/shutdown adjusted to 1.6 lb/shutdown.

## Continuous Operation

20. Please provide the steps that the applicant will take to ensure continuous operation at base-load to meet the 300 hours operational requirement.

**Response:** GE Energy requires 300 hours of base load operation as a final completion step to the commissioning process. Compliance with the entire commissioning process will be made through the application of fuel use monitoring, emissions factors, and hours of operation. The Applicant fully expects to have placed in the permit a condition that limits the commissioning phases to a total 394 hours per turbine.

As a result, WCE has revised AFC Table 8.1A-10 (Commissioning Emissions), as Table DR20-1, to reflect the additional hours added to the final phase of commissioning. In addition, a correction was made to the total number of units that would be operational simultaneously in each phase. Originally, Phase 1 had four turbines and Phase 4 had five turbines operating simultaneously. Now, both of these phases will have no more than three turbines operating simultaneously.

TABLE DR20-1  
Commissioning Emissions

Commissioning Phase	1	2	3	4	5	6	Total
Water Injection	No	No	50%	Yes	Yes	Yes	
SCR Installed	No	No	No	No	50%	Yes	
CO Catalyst Installed	No	No	No	No	Yes	Yes	
Hours per Unit	20	14	24	12	24	300	394
# Units Operating Simultaneously*	3	3	1	3	5	5	
Avg Load %	0	5	50	100	75	100	
NO <sub>x</sub> lb/hr	91	99	175	81	35	8.1	
CO lb/hr	55	60	168	255	9	12	
VOC lb/hr	2	2	3	5	4	2	
MMBtu/hr - HHV	150	180	500	900.5	700	900.5	
NO <sub>x</sub> lb/mmscf	641	581	370	95	53	9	
CO lb/mmscf	387	352	355	299	14	14	
VOC lb/mmscf	14	12	6	6	6	2	

TABLE DR20-1  
Commissioning Emissions

Commissioning Phase	1	2	3	4	5	6	Total
Total NOx lbs (5 units)	9,100	6,930	21,000	4,860	4,200	12,150	58,240
Total CO lbs (5 units)	5,500	4,200	20,160	15,300	1,080	18,000	64,240
Total VOC lbs	200	140	360	300	480	3,000	4,480

\* Assume this number of units operate simultaneously at condition stated with the remaining units operating at fully commissioned full output conditions.

Natural gas MMBtu/mmscf: 1056

Number of GT Units: 5

Phase	Description
1	Pre-break-in checkout.
2	Controlled break-in run.
3	Water injection commissioning. Assume that water injection is 50% effective.
4	Complete AVR commissioning.
5	SCR commissioning. Assume that NOx SCR is 50% effective and CO catalyst is 100% effective.
6	Full load testing & checkout.

### Emissions Limits

21. *If the operational requirement cannot be reasonably met, please provide a discussion and analysis to show whether the facility can meet the turbines' PM and VOC emissions limits identified in the AFC. If these PM and VOC emissions levels cannot be met, please provide new estimates for the turbine PM and VOC emissions, impacts and offsets.*

**Response:** No revisions are necessary.

### Fuel Sulfur Documentation

22. *Please provide documentation from the proposed natural gas supplier of the guaranteed fuel sulfur content level.*

**Response:** Natural gas for the WCEP will be supplied by the Southern California Gas Company (SoCal Gas). Gas quality is regulated by Rule No. 30 "Transportation of Customer-Owned Gas" (see Attachment AIR-1). Rule No. 30, Section I "Gas Quality" limits total fuel sulfur to no more than 0.75 grains/100 scf. In practice and based on historical fuel analysis, SoCal Gas has delivered gas to its customers with a fuel sulfur content well below 0.25 grains per 100 scf (see Response #23 below).

### Fuel Sulfur Daily Values

23. *Please provide the most recently available six months of daily gas sulfur content values from the proposed natural gas supplier, collected at the nearest available source to the proposed facility gas tie-in. If daily values are not available, please provide either weekly or monthly sulfur content values, whichever is available, with an explanation as to why daily measurements are not available.*

**Response:** Data provided by SoCal Gas for the period January 1, 2005, to January 1, 2006, indicates that the gas fuel sulfur content averages 0.091 grains per 100 scf or 1.533 ppmv. These averages provide data which indicates that in all likelihood the maximum gas sulfur content will be well below 0.25 grains per 100 scf, and that the annual average of the delivered gas will also be below the 0.25 grains per 100 scf.

## Fuel Sulfur Limits

24. *Please provide the steps the applicant will take to ensure that natural gas that has higher than 0.25 gr/100scf of sulfur will not be used at the facility.*

**Response:** The Applicant cannot guarantee fuel quality when it has no control over the fuel supply (origin) or distribution and mixing network, etc. The Applicant is committed to using clean burning natural gas which, based on historical data and future expectations, will continue to be extremely low in total sulfur content, resulting in low emissions of SO<sub>2</sub>. In addition, it should be noted that the data referenced above and presented in Attachment AIR-2 indicates that the overall average gas sulfur contents are well below the 0.25 grains per 100 scf value quoted in the AFC, which means that the actual SO<sub>2</sub> emissions will most likely be less than those stated in the AFC on an annual basis.

## Fuel Sulfur Daily Values

25. *Please provide the method the applicant will use to ensure continuous compliance with the sulfur content limits specified for the supplied natural gas fuel.*

**Response:** The Applicant will rely upon SoCal Gas to insure that the gas supplied to the plant (as well as to all the remaining gas customers) is the highest quality; that is, having the lowest possible fuel sulfur contents. In addition, the facility will evaluate the need for a program of periodic on-site gas fuel sampling and analysis to determine compliance with the stated gaseous fuel sulfur value or 0.25 grains per 100 scf. Pursuant to NSPS Subpart KKKK (new turbines greater than or equal to 1 MW and constructed after February 18, 2005) Section 60.4365, the WCEP turbines would not need to monitor (sample and analyze) fuel for sulfur content since the current tariff and transportation sheet for the proposed natural gas (Rule 30 as attached) insures that the gas sulfur content will be well below the 300-ppmw NSPS Subpart KKKK limit.

## Emergency Diesel Engine Fuel

26. *Please discuss the feasibility of using ultra-low sulfur diesel, which contains no more than 15 ppm sulfur, as fuel for the fire pump engines.*

**Response:** Use of ultra-low sulfur diesel which contains no more than 15 ppm sulfur (0.0015 percent S by weight) will be used for the fire pump engine.

## Air Dispersion Modeling

27. *Given the scenario of using ultra-low sulfur diesel in the fire pump engine, please revise project emissions and, if appropriate, air dispersion modeling.*

**Response:** No revisions to the modeling are needed, as the fire-pump engine's emissions assumed use of ultra-low sulfur fuel. Air quality impacts from the use of the proposed diesel fuel with a sulfur content of 0.015 percent by weight are insignificant, that is, downwind impact values do not violate any SIL, nor do they cause or contribute a violation of any SO<sub>2</sub> air quality standard. As such, the use of ultra-low sulfur diesel fuel will also have insignificant impacts on local and regional SO<sub>2</sub> air quality.

## Modeling Documentation

28. *Please provide a text file describing the input and output modeling files.*

**Response:** A text file has been provided on electronic media.

## Cumulative Impact Analysis

29. *Please clarify whether an air quality cumulative impact analysis has been performed. If it has, please provide the modeling assumptions, model input and output files, and modeling results.*

**Response:** The source inventory file necessary for the completion of the cumulative impact analysis has been requested from the South Coast AQMD. Upon receipt and QA/QC of the data, the cumulative analysis will be prepared and forwarded to Staff and the AQMD.

## List of Projects for Cumulative Impacts Analysis

30. *If a cumulative impact analysis has not been performed, please discuss the status of efforts to obtain a list of projects near the WCEP project site that meet the criteria listed in Section 8.1H, Cumulative Impacts Analysis Protocol. If the aforementioned list has been obtained, please submit the list of the emission sources to be included in the cumulative air quality impacts analysis. Upon staff's review of and concurrence with the sources identified, please perform a cumulative impact analysis according to the modeling protocol in the AFC.*

**Response:** See Response #29.

## Commissioning Impacts Summary

31. *The table of contents for Appendix 8.1B (p. 8.1B-1) lists Appendix 8.1B-12 (Commissioning Impacts Summary), but that appendix is missing from the AFC. Please provide a copy of Appendix 8.1B-12.*

**Response:** The reference to a Table 8.1B-12 was inadvertently included in the AFC. The commissioning impacts summary is found in the AFC text in Section 8.1.2.4.4.

## New Equipment Emissions

32. *Table 8.1-29 (p. 8.1-45) lists most emissions values for the new equipment. The value for "Total project, pounds per day" has a footnote "c" reading "Based on 3,468 hours of operation, including 350 startups and 350 shutdowns." It appears that footnote "b" should be the reference here instead. Please clarify this footnote reference.*

**Response:** Footnote "c" is a typographical error and should be deleted at this specific point. This particular footnote applies only to the bottom row of the Table 8.1-29; that is, Maximum Annual Emissions.

## Short-Term Emissions Profile

33. *On page 8.1-41 the applicant states that the short-term emissions profile is "20 hours of base load with 4 hours in startup/shutdown...." This is at odds with the assumption in the footnote of Table 8.1-29 (p. 8.1-45) of "22 hours of base operation and 1.5 hours of startup/shutdown" and Table 8.1A-2a (Appendix 8.1A). Please clarify the short-term emissions profile assumption.*

**Response:** The short-term emissions, for purposes of establishing “permit limits,” are based on 22 hours of base load operation with 1.5 hours per day in startup and shutdown mode, leaving approximately 0.5 hours of non-operation. For purposes of establishing “worst case modeling impacts,” the operations are based on 20 hours per day of base load, with 4 hours of startup and shutdown mode.

## Base Load Operation

34. *The maximum daily emissions calculations in Table 8.1A-2a (Appendix 8.1A) are all based on 22 hours of base load plus two startups and two shutdowns. Given the startup and shutdown duration assumptions in the same table, this would result in 28 minutes of missing base load operation in each daily maximum calculation (22 hours plus 70 minutes for startups plus 22 minutes for shutdowns equals 23 hours and 32 minutes). Please discuss the possibility of revising all maximum short-term emissions estimates to include some level of operation (be it startup, shutdown or steady state) during these missing 28 minutes.*

**Response:** No revision is proposed. The plant does not have to operate 24 hours a day in order to secure certification or AQMD permits. The plant daily operations include a period of non-operation, which is approximately 28 minutes in length. The emissions presented are the worst case on a daily basis. Base load operations for 24 hours per day of would result in emissions that are less than the values proposed per Appendix 8.1A.

## CO Pounds per Day

35. *Table 8.1-29 (p. 8.1-45) and Table 8.1A-2a (Appendix 8.1A) list the value for “Total project, pounds per day” for the pollutant CO as 1,645.2 lbs/day. Staff calculations indicate this figure should be 2,338.18 lbs/day (based on five turbines, 22 hours per day base load plus two startups and two shutdowns for each turbine). Staff’s pounds per day calculations for the other four pollutants (NO<sub>x</sub>, SO<sub>x</sub>, VOC, and PM<sub>10/2.5</sub>) agree exactly with the values in these tables. Please provide a clear step-by-step calculation for the CO pounds per day value, including references for all input values and a discussion of all assumptions.*

**Response:** The Staff calculations are in error. Staff has incorrectly assumed 22 hours of shutdown emissions, instead of using 22 hours of base load emissions.

## CO Tons per Year

36. *Table 8.1-29 (p. 8.1-45) and Table 8.1A-2a (Appendix 8.1A) list the value for “Maximum Annual Emission, tons” for the pollutant CO as 124.6 tons per year (tpy). Staff’s calculations indicate this figure should be 175.00 tpy (based on 5 turbines, 3200 hours base load plus 350 startups and 350 shutdowns for each turbine). Staff’s pounds per day calculations for the other four pollutants (NO<sub>x</sub>, SO<sub>x</sub>, VOC, and PM<sub>10/2.5</sub>) agree exactly with the values in these AFC tables. Please provide a clear step-by-step calculation for the CO tons per year value, including references for all input values and a discussion of all assumptions.*

**Response:** See Response #35.

## Cooling Tower PM<sub>10</sub>

37. Table 8.1A-2a (Appendix 8.1A) lists annual PM<sub>10</sub> emissions from the cooling towers as 0.87 tons. Staff's calculations indicate this figure should be 0.770 tons (based on 0.444 lb/hr multiplied by 3468 hrs/year). Please clarify this calculation. If the annual value of 0.87 tons in Table 8.1A-2a is in fact incorrect, please provide a clear list of corrected values in all tables affected by this change.

**Response:** The cooling tower emissions are correct as stated in the application. The cooling tower will actually be placed in operation prior to startup of the turbines and will continue to operate after turbine shutdown. This required mode of operation will result in slightly higher total hours of operation as compared to the turbine operation hours, thus the emissions are based on a higher annual operation-hour scenario as stated on Table 8.1A-4 in Appendix 8.1A.

## Emergency Generator

38. Table 8.1A-2b, 8.1A-8, and 8.1A-9 (all in Appendix 8.1A) reference an Emergency Generator that does not appear in any other section of the analysis. Please clarify whether this piece of equipment is part of the project description.

**Response:** The emergency generator data was included only as informational, as the project developer had made a final determination to include such a device in the project design. The generator is not part of the project at this time, and the data should be disregarded. The emergency generator was not included in the HRA.

## NO<sub>2</sub> and SO<sub>2</sub> Values

39. Table 8.1E-4 (Appendix 8.1E) has two minor discrepancies. First, the table lists the total annual nitrogen dioxide (NO<sub>2</sub>) impact as 69.5 micrograms per cubic meter (µg/m<sup>3</sup>), whereas it appears that it should be 69.3 based on the listed modeled impact and background. Second, the table lists the sulfur dioxide (SO<sub>2</sub>) 24-hour background value as 25.4 µg/m<sup>3</sup>, which disagrees with the value of 23.5 listed in Table 8.1-38, based on Table 8.1-37. Please clarify and correct both of these values.

**Response:** The SO<sub>2</sub> 24-hour background value in Table 8.1-38 is correct. Initial data from CARB and the South Coast AQMD ambient monitoring summaries showed slight differences in some values. The value listed in Appendix 8.1E, Table 8.1E-4 should read 23.5 µg/m<sup>3</sup>. The NO<sub>2</sub> value should read 69.3 µg/m<sup>3</sup>. This is probably just an inadvertent typographical error which results in no significant changes to impacts, etc.

## Commissioning Estimates

40. Please provide a detailed discussion of the turbine commissioning estimates presented in AFC Table 8.1A-10. Please include citations of specific vendor documents and/or other sources for all input assumptions.

**Response:** The commissioning period was broken into a number of specific phases for each of the following major system commissioning steps:

1. Pre-break-in check-out (full speed-no load with no water injection or catalyst systems in service)

2. Controlled break-in run (low load with no water injection or catalyst systems in service)
3. Water injection commissioning (0-100 percent load with partial water injection and no SCR)
4. Commissioning of Automatic Voltage Regulation (full load with full water injection and no SCR)
5. SCR commissioning (50-100 percent load with full water injection and partial SCR)
6. Full-load testing and checkout (full load with full water injection and full SCR)

The turbine manufacturer (GE Energy) provided estimated commissioning durations and load profiles for each of the phases. Based on CEC experience with commissioning periods often taking longer than originally estimated, a margin was applied to the GE duration estimates. At the various load levels dictated by the commissioning load profiles, estimated emission levels (in ppm) were obtained from a proprietary curve provided by the manufacturer. In general, emission levels (in lb/hr) were estimated by using a ratio of turbine exhaust flow and emission levels (in ppm), as appropriate, between a known condition and the estimated condition.

## Emissions and Exhaust

41. *Please provide an explanation of how the turbine's emissions and exhaust conditions (i.e., flow rate and temperature) were estimated for inputs into the modeling analysis.*

**Response:** Staff is referred to AFC Section 8.1.2.4.3 (Turbine Startup/Shutdown) and Table 8.1-33 for a complete description of the assumptions used to estimate emissions and exhaust conditions.

## Modeling Analysis

42. *If the startup emissions rates and characteristics are revised, please provide a revised modeling analysis showing the facility impacts during startups.*

**Response:** No revision is necessary.

# Attachment AIR-1

SoCal Gas Rule #30

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TRANSPORTATION OF CUSTOMER-OWNED GAS

The provisions of this Rule shall not apply to service until the date of full implementation of the CPUC's Capacity Brokering Rules set forth in Decision Nos. 91-11-025 and 92-07-025 and Resolution Nos. G-3023, G-3033 and G-3043.

The general terms and conditions applicable whenever the Utility transports customer-owned gas over its system are described herein.

A. General

1. Subject to the terms, limitations and conditions of this rule and any applicable CPUC authorized tariff schedule, directive, or rule, the customer will deliver or cause to be delivered to the Utility and accept on redelivery quantities of customer-owned gas which shall not exceed Utility's capability to receive or redeliver such quantities. Utility will accept such quantities of gas from the customer or its designee and redeliver to the customer on a reasonably concurrent basis an equivalent quantity, on a term basis, to the quantity accepted.
2. The customer warrants to the Utility that the customer has the right to deliver the gas provided for in the customer's applicable service agreement or contract (hereinafter "service agreement") and that the gas is free from all liens and adverse claims of every kind. The customer will indemnify, defend and hold the Utility harmless against any costs and expenses on account of royalties, payments or other charges applicable before or upon delivery to the Utility of the gas under such service agreement.
3. The point(s) where the Utility will receive the gas into its intrastate system (point(s) of receipt, as defined in Rule No. 1) and the point(s) where the Utility will deliver the gas from its intrastate system to the customer (point(s) of delivery, as defined in Rule No. 1) will be set forth in the customer's applicable service agreement. Other points of receipt and delivery may be added by written amendment thereof by mutual agreement. The appropriate delivery pressure at the points of delivery to the customer shall be that existing at such points within the Utility's system or as specified in the service agreement.

B. Quantities

1. The Utility shall as nearly as practicable each day redeliver to customer and customer shall accept, a like quantity of gas as is delivered by the customer to the Utility on such day. It is the intention of both the Utility and the customer that the daily deliveries of gas by the customer for transportation hereunder shall approximately equal the quantity of gas which the customer shall receive at the points of delivery. However, it is recognized that due to operating conditions either (1) in the fields of production, (2) in the delivery facilities of third parties, or (3) in the Utility's system, deliveries into and redeliveries from the Utility's system may not balance on a day-to-day basis. The Utility and the customer will use all due diligence to assure proper load balancing in a timely manner.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 2651  
DECISION NO. 97-11-070

ISSUED BY  
**Paul J. Cardenas**  
Vice President

(TO BE INSERTED BY CAL. PUC)  
DATE FILED Nov 21, 1997  
EFFECTIVE Dec 26, 1997  
RESOLUTION NO. \_\_\_\_\_

Rule No. 30

Sheet 2

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

B. Quantities (continued)

2. The gas to be transported hereunder shall be delivered and redelivered as nearly as practicable at uniform hourly and daily rates of flow. Utility may refuse to accept fluctuations in excess of ten percent (10%) of the previous day's deliveries, from day to day, if in the Utility's opinion receipt of such gas would jeopardize other operations. Customers may make arrangements acceptable to the Utility to waive this requirement.
3. The Utility does not undertake to redeliver to the customer any of the identical gas accepted by the Utility for transportation, and all redelivery of gas to the customer will be accomplished by substitution on a therm-for-therm basis.
4. Transportation customers, contracted marketers, and aggregators will be provided monthly balancing services in accordance with the provisions of Schedule No. G-IMB.
5. Gas shall be transported hereunder for use only by the customer within the state of California, and not for delivery or resale to a third party unless authorized by the Commission.

C. Electronic Bulletin Board

1. SoCalGas prefers and encourages customers to use Electronic Bulletin Board (EBB) as defined in Rule No. 1 to submit their transportation nominations to the Utility. Imbalance trades are to be submitted through EBB or by means of the Imbalance Trading Agreement Form (Form 6544). Charges for EBB are set forth in Rule No. 33 and are based upon the level of actual usage. Use of EBB is not mandatory for transportation only customers.

D. Operational Requirements

1. The customer must provide to the Utility the name(s) of its shipper(s) as well as any brokers or agents ("agent") used by the customer for delivery of gas to the Utility for transportation service hereunder and their authority to represent customer.
2. Transportation nominations may be submitted manually or through EBB. For each transportation nomination submitted manually, (by means other than EBB such as facsimile transmittal), a processing charge of \$11.87 shall be assessed. No processing charge will apply to an EBB subscriber for nominations submitted by fax at a time the EBB system is unavailable for use by the subscriber.

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 3235  
 DECISION NO.

ISSUED BY  
**Lee Schavrien**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Feb 7, 2003  
 EFFECTIVE Mar 30, 2003  
 RESOLUTION NO. \_\_\_\_\_

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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

D. Operational Requirements (continued)

3. Transportation nominations submitted via EBB for the Timely Nomination cycle must be received by the Utility by 9:30 a.m. Pacific Clock Time one day prior to the flow date. Nominations submitted via fax must be received by the Utility by 8:30 a.m. Pacific Clock Time one day prior to the flow date. Nominations received after the nomination deadline will be processed after the nominations received before the nomination deadline. All nominations are considered original nominations and should be replaced to be changed.

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Nominations submitted via EBB for the Evening Nomination cycle must be received by the Utility by 4:00 p.m. Pacific Clock Time one day prior to the flow date. Nominations submitted via fax must be received by the Utility by 3:00 p.m. Pacific Clock Time one day prior to the flow date.

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Nominations submitted via EBB for the Intraday 1 Nomination cycle must be received by the Utility by 8:00 a.m. Pacific Clock Time on the flow date. Nominations submitted via fax must be received by the Utility by 7:00 a.m. Pacific Clock Time on the flow date.

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Nominations submitted via EBB for the Intraday 2 Nomination cycle must be received by the Utility by 3:00 p.m. Pacific Clock Time on the flow date. Nominations submitted via fax must be received by the Utility by 2:00 p.m. Pacific Clock Time on the flow date.

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Evening and Intraday nominations may be used to request an increase or decrease to scheduled volumes or a change to receipt or delivery points.

4. Where gas is transported by a shipper or agent to more than one customer of the Utility and the transporting pipeline's allocation to the shipper or agent is less than the shipper's or agent's requested quantity, such shipper or agent must allocate among its customers the total quantity of gas delivered each day to the Utility by the shipper or agent.

An allocation ranking must be submitted to the Utility no later than 3:00 p.m. Pacific Clock Time on the date of flow. An allocation ranking should be received for each flow date from each shipper. Agent rankings should be submitted along with the nominations.

If no allocation ranking is made by such shipper or agent by the due date and time, the Utility will use a pro rata allocation in allocating delivered quantities among the shipper's or agent's customers and the Utility's allocation of these quantities will prevail. The total quantity allocated among the customers of a shipper or agent during a month shall be adjusted by the Utility if necessary to match the actual monthly delivery to the Utility for the shipper or agent as reported by the transporting pipeline.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 3235  
DECISION NO.

ISSUED BY  
**Lee Schavrien**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
DATE FILED Feb 7, 2003  
EFFECTIVE Mar 30, 2003  
RESOLUTION NO. \_\_\_\_\_

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

5. As between the customer and the Utility, the customer shall be deemed to be in control and possession of the gas to be delivered hereunder and responsible for any damage or injury caused thereby until the gas has been delivered at the point(s) of receipt. The Utility shall thereafter be deemed to be in control and possession of the gas after delivery to the Utility at the point(s) of receipt and shall be responsible for any damage or injury caused thereby until the same shall have been redelivered at the point(s) of delivery, unless the damage or injury has been caused by the quality of gas originally delivered to the Utility, for which the customer shall remain responsible.
6. Any penalties or charges incurred by the Utility under an interstate or intrastate supplier contract as a result of accommodating transportation service shall be paid by the responsible customer.
7. Customers receiving service from the Utility for the transportation of customer-owned gas shall pay any costs incurred by the Utility because of any failure by third parties to perform their obligations related to providing such service.

E. Interruption of Service

1. The customer's transportation service priority shall be established in accordance with the definitions of Core and Noncore service, as set forth in Rule No. 1, and the provisions of Rule No. 23, Continuity of Service and Interruption of Delivery. If the customer's gas use is classified in more than one service priority, it is the customer's responsibility to inform the Utility of such priorities applicable to the customer's service. Once established, such priorities cannot be changed during a curtailment period.
2. The Utility shall have the right, without liability (except for the express provisions of the Utility's Service Interruption Credit as set forth in Rule No. 23), to interrupt the acceptance or redelivery of gas whenever it becomes necessary to test, alter, modify, enlarge or repair any facility or property comprising the Utility's system or otherwise related to its operation. When doing so, the Utility will try to cause a minimum of inconvenience to the customer. Except in cases of unforeseen emergency, the Utility shall give a minimum of ten (10) days advance written notice of such activity.

F. Nominations in Excess of System Capacity

1. In the event the Utility determines that the transportation nominations received for a specific date of gas flow ("flow date") exceed its expected system capacity (including storage) on such flow date, the Utility shall apply Buy-Back service under Schedule No. G-IMB separately for each flow date that is overnominated. In such event, the Utility shall follow the procedure set forth below. This procedure and the resulting periods of excess nominations shall apply only to (1) all noncore transportation customers, and (2) all customers with usage exceeding 250,000 therms per year at each facility served under Schedule Nos. GT-10 and GT-NGV.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 2917  
DECISION NO. 00-04-060

ISSUED BY  
**William L. Reed**  
Vice President  
Chief Regulatory Officer

(TO BE INSERTED BY CAL. PUC)  
DATE FILED May 19, 2000  
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RESOLUTION NO. \_\_\_\_\_

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

F. Nominations in Excess of System Capacity (continued)

2. If the Utility determines that transportation nominations received for a specific flow date will result in a period of excess nominations, the Utility shall effectuate at such time a reduction of Hub services that would contribute to the overnomination event and as-available storage injection nominations made for service under Schedule No. G-AUC. Such reductions shall be made in the order of the as-available service queue.
3. If such reductions in nominations are inadequate in resolving the excess transportation nominations problem, Utility shall notify all applicable customers that an excess nominations period shall be instituted. The Utility shall provide such notice via its EBB system.
4. The excess nominations period shall begin on the flow date(s) indicated by the Utility. Nominations for customers without automated meter reading devices will be reduced to the maximum daily quantity specified for the customer. Customers shall be allowed to reduce their nominations in response to the Utility's notification. Such nominations reductions must be received by the Utility within two (2) business hours from the Utility's notification. If such voluntary reductions are adequate to bring the system into balance, the overnomination flow date will be anceled. Nomination reductions received after this deadline shall be considered received for the next day's nominations.
5. In the event customers fail to adequately reduce their transportation nominations, the Utility shall reduce the nominations of those customers that the Utility believes are causing the excess nominations problem. In making such nominations reductions, the Utility shall utilize the most recent and best available operating data at its disposal.
6. In cases where the Utility reduces a customer's nomination under the above procedure and, as a result of such reduction, the customer uses Standby Procurement service under Schedule No. G-IMB in excess of the 10% tolerance band, the customer shall be allowed to additionally carry over the lesser of (1) the negative imbalance for the month in excess of the tolerance band, or (2) the amount of the customer's total involuntary nominations reductions for the month. Such additional carryover shall be applied to the customer's imbalance account at the conclusion of the imbalance trading period for the month in which the involuntary reduction occurred.
7. In accordance with the provisions of Schedule No. G-IMB, Buy-Back service shall be applied separately to each excess nominations day. Customer meters subject to maximum daily quantity limitations will use the maximum daily quantity as a proxy for daily usage. For each such day, the Utility shall apply the applicable Buy-Back rate to all of the customer's deliveries, less any firm storage injections made on behalf of the customer, for the designated flow date that are in excess of 110% of the customer's actual usage.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 3235  
DECISION NO.

ISSUED BY  
**Lee Schavrien**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
DATE FILED Feb 7, 2003  
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Rule No. 30

Sheet 6

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

F. Nominations in Excess of System Capacity (continued)

8. Consistent with the requirements of Decision No. 92-07-025, the Utility's Gas Supply Department shall limit its deliveries into its system on behalf of its core sales market to no more than 110% of actual gas usage for the core (including firm storage injections on behalf of the core) during periods of excess transportation nominations.

G. Winter Deliveries

The Utility requires that customers deliver (using a combination of flowing supply and firm storage withdrawal) at least 50% of burn over a five day period from November through March. As the Utility's total storage inventory declines through the winter, the delivery requirement becomes daily and increases to 70% or 90% depending on the level of inventory relative to peak day minimums.

1. From November 1 through March 31 customers are required to deliver (flowing supply and firm storage withdrawal) at a minimum of 50% of burn over a 5-day period. In other words, for each 5-day period, the Utility will calculate the total burn and the total delivery. If the total delivery is less than 50% of the total burn, a daily balancing standby charge is applied. The daily balancing standby rate is 150% of the highest Southern California Border price during the five day period as published by Natural Gas Intelligence in "NGI's Daily Gas Price Index," including authorized franchise fees and uncollectible expenses (F&U) and brokerage fees. Imbalance trading and as-available withdrawals may not be used to offset the delivery minimums. As an additional requirement, retail core and core aggregation will deliver a volume no less than 50% of their allocated firm interstate pipeline rights.
  - a. "Burn" means usage and is defined as metered throughput or an estimated quantity such as Minimum Daily Quantity (MinDQ), as defined in Rule No. 1, for customers without automated meters.
  - b. Example five-day periods are: Nov. 1 through Nov. 5, Nov. 6 through Nov. 10, Nov. 11 through Nov. 15 and so on. November with 30 days has six 5-day periods. December, January and March with 31 days have a 6-day period at the end of the month. February has a shortened 3 or 4-day period at the end of the month. The current 5-day period will run its course fully before the implementation of the 70% daily requirement. In the event that inventories rise above the 70% daily trigger levels by 1 Bcf, then a new, 5-day period will be implemented on the following day.
  - c. Example calculations for determining volumes subject to the daily balancing standby rate are: if over 5 days, total burn is 500,000 therms and total deliveries (including firm withdrawal) are 240,000 therms, then 10,000 therms is subject to daily balancing standby rate. (50% times 500,000 minus 240,000 equals 10,000).

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 2734  
 DECISION NO.

ISSUED BY  
**Paul J. Cardenas**  
 Vice President

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Aug 7, 1998  
 EFFECTIVE Sep 16, 1998  
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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Winter Deliveries (continued)

1. (continued)

- d. Example calculations in using NGI's Daily Gas Price Index for determining the daily balancing standby rate are: If for Jan. 6 through Jan. 10 the NGI Southern California Border quoted price ranges are \$2.36- 2.39, \$2.36-2.44, \$2.38-2.47, \$2.36-2.42, and \$2.37- 2.45, respectively, then the daily balancing standby rate becomes \$3.71 (\$2.47 times 150%).
  - e. With the exception of weekends and holidays, the Utility will use quotes from the NGI publication dated on the same day as the flow date. Weekend or holiday flow dates will use the first available publication date after the weekend or holiday.
  - f. Under current capacity assignments, 50% of core (retail core plus core aggregation) interstate pipeline rights translates to 522 MMcf/d. For aggregators this translates to 50% of the Daily Contract Quantity (DCQ) as defined in Rule No. 1.
2. When total inventory declines to the "peak day minimum + 20 Bcf trigger," the minimum daily delivery requirement increases to 70%. Customers are then required to be balanced (flowing supply plus firm storage withdrawal) at a minimum of 70% of burn on a daily basis. The 5-day period no longer applies since the system can no longer provide added flexibility. The daily balancing standby rate is 150% of the highest Southern California Border price per NGI's *Daily Gas Price Index* for the day (including authorized F&U and brokerage fees) and is applied to each day's deliveries which are less than the 70% requirement. In this regime as-available storage withdrawal is cut in half. All Hub activity contributing to the underdelivery situation (i.e., Hub deliveries greater than Hub receipts) is suspended.
- a. Peak day minimums are calculated annually before November 1 as part of normal winter operations planning. The peak day minimum is that level of total inventory that must be in storage to provide deliverability for the core 1-in-35 year peak day event, firm withdrawal commitments and noncore balancing requirement.
  - b. Example calculations in this regime for determining volumes subject to the daily balancing standby rates are: If on January 6 total burn is 500,000 therms, and total deliveries (including firm withdrawal) are 300,000 therms then 50,000 therms is subject to the daily balancing standby charge (70% times 500,000 minus 300,000 equals 50,000).
  - c. Example calculations in using NGI's Daily Gas Price Index for daily balancing standby rates in this regime are: if for January 6 and January 7, the NGI Southern California Border quoted price ranges are \$2.36-2.39 and \$2.36-2.44, then the daily balancing standby rates become \$3.59 (150% of 2.39) for January 6, and \$3.66 (150% times 2.44) for January 7, respectively.

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(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 2734  
 DECISION NO.

ISSUED BY  
**Paul J. Cardenas**  
 Vice President

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Aug 7, 1998  
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 RESOLUTION NO. \_\_\_\_\_

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Winter Deliveries (continued)

3. When total inventories decline to the "peak day minimum + 5 Bcf trigger," the minimum daily delivery requirement increases to 90%. Customers are required to be balanced (flowing supply plus firm storage withdrawal) at a minimum of 90% of burn on a daily basis. Similar to the 70% regime the 5 day period no longer applies. The daily balancing standby rate is charged daily and is 150% of the highest Southern California Border price per NGI's *Daily Gas Price Index* for the day (including authorized F&U and brokerage fees). In this regime there are no as-available storage withdrawals. All Hub activity contributing to the underdelivery situation (i.e., Hub deliveries greater than Hub receipts) is suspended.
4. Information regarding the established peak day minimums, daily balancing trigger levels and total storage inventory levels will be made available to customers on a daily basis via EBB and other customer notification media.
5. If a wholesale customer so requests, the Utility will nominate firm storage withdrawal volumes on behalf of the customer to match 100% of actual usage assuming the customer has sufficient firm storage withdrawal and inventory rights to match the customer's supply and demand.
6. The Utility will accept intra-day nominations to increase deliveries.
7. In all cases, current BCAP rules for monthly balancing and monthly imbalance trading continue to apply. Volumes not in compliance with the 50%, 70% and 90% minimum delivery requirements, purchased at the daily balancing standby rate, are credited toward the monthly 90% delivery requirements. Daily balancing charges remain independent of monthly balancing charges. Daily balancing and monthly balancing charges go to the Purchased Gas Account (PGA). Schedule No. G-IMB provides details on monthly and daily balancing charges.

H. Accounting and Billing

1. The customer and the Utility acknowledge that on any operating day during the customer's applicable term of transportation service, the Utility may be redelivering quantities of gas to the customer pursuant to other present or future service arrangements. In such an event, the Utility and customer agree that the total quantities of gas shall be accounted for in accordance with the provisions of Rule No. 23. If there is no conflict with Rule No. 23, the quantities of gas shall be accounted for in the following order:

(Continued)

(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 3235

DECISION NO.

8C13

ISSUED BY

**Lee Schavrien**

Vice President

Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

DATE FILED Feb 7, 2003

EFFECTIVE Mar 30, 2003

RESOLUTION NO. \_\_\_\_\_

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Rule No. 30

Sheet 9

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

H. Accounting and Billing (continued)

1. (continued)

- a. First, to satisfy any minimum quantities under existing agreements.
  - b. Second, after complete satisfaction of (a), then to any supply or exchange service arrangements with the customer.
  - c. Third, after the satisfaction of (a) and (b), then to any subsequently executed service agreement.
2. The customer agrees that it shall accept and the Utility can rely upon, for purposes of accounting and billing, the allocation made by customer's shipper as to the quality and quantity of gas, expressed both in Mcf and therms, delivered at each point of receipt during the preceding billing period for the customer's account. If the shipper does not make such an allocation, the customer agrees to accept the quality and quantity as determined by the Utility. All quality and measurement calculations are subject to subsequent adjustment as provided in the Utility's tariff schedules or applicable CPUC rules and regulations. Any other billing correction or adjustment made by the customer or third party for any prior period shall be based on the rates or costs in effect when the event occurred and accounted for in the period they are reconciled.
3. The Utility shall render to the customer an invoice for the services hereunder showing the quantities of gas, expressed in therms, delivered to the Utility for the customer's account, at each point of receipt and the quantities of gas, expressed in therms, redelivered by Utility for the customer's account at each point of delivery during the preceding billing period. The Customer shall pay such amounts due hereunder within nineteen (19) calendar days following the date such bill is mailed.
4. Both the Utility and the customer shall have the right at all reasonable times to examine, at its expense, the books and records of the other to the extent necessary to verify the accuracy of any statement, charge, computation, or demand made under or pursuant to service hereunder. The Utility and the customer agree to keep records and books of account in accordance with generally accepted accounting principles and practices in the industry.

I. Gas Quality

1. The gas stream delivered by the customer into the Utility's system shall conform to the gas quality specifications as provided in any applicable agreements, contracts, service contracts and tariff schedules in effect between the delivering interstate or intrastate pipeline and the Utility at the time of the delivery.

(Continued)

(TO BE INSERTED BY UTILITY)  
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ISSUED BY  
**William L. Reed**  
Vice President  
Chief Regulatory Officer

(TO BE INSERTED BY CAL. PUC)  
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Rule No. 30

Sheet 11

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

I. Gas Quality (continued)

2. (continued)

j. Dust, Gums and Other Objectionable Matter: The gas shall be commercially free from dust, gums and other foreign substances.

k. Hazardous Substances: The gas must not contain hazardous substances (including but not limited to toxic and/or carcinogenic substances and/or reproductive toxins) concentrations which would prevent or restrict the normal marketing of gas, be injurious to pipeline facilities, or which would present a health and/or safety hazard to Utility employees and/or the general public.

l. Delivery Temperature: The gas delivery temperature is not to be below 50F or above 105F.

m. Interchangeability: The gas shall meet American Gas Association's Wobbe Number, Lifting Index, Flashback Index and Yellow Tip Index interchangeability indices for high methane gas relative to a typical composition of gas in the Utility system near the points of receipt. Acceptable specification ranges are:

\* Wobbe Number (W for receiving facility)  
(WP for producer)  
 $0.9 W \leq WP \leq 1.1 W$

\* Lifting Index (IL)  
 $IL \leq 1.06$

\* Flashback Index (IF)  
 $IF \leq 1.2$

\* Yellow Tip Index (IY)  
 $IY \geq 0.8$

\* Specifications are in relation to a typical composition of gas serving the area to be supplied by the new source.

3. The Utility, at its option, may refuse to accept any gas tendered for transportation by the customer or on his behalf if such gas does not meet the specifications as set out in I. 1 and I. 2 above, as applicable.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 2665  
DECISION NO.

ISSUED BY  
**William L. Reed**  
Vice President  
Chief Regulatory Officer

(TO BE INSERTED BY CAL. PUC)  
DATE FILED Jan 16, 1998  
EFFECTIVE Feb 25, 1998  
RESOLUTION NO. \_\_\_\_\_



# Attachment AIR-2

## Sulfur Gas Tables

---

## SOUTHERN CALIFORNIA GAS COMPANY

### Walnut Creek Energy Park

From 01/05 to 12/05 (grains S/100 cf)

Out of State Suppliers Location	H <sub>2</sub> S			RSH			Total Sulfur*		
	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg
NN	0.002	0.088	0.013	0.001	0.085	0.007	0.048	0.173	0.100
B1	0.000	0.018	0.007	0.027	0.115	0.060	0.042	0.131	0.067
B2	0.000	0.018	0.005	0.030	0.130	0.064	0.046	0.145	0.069
SN	0.000	0.024	0.007	0.047	0.214	0.084	0.047	0.236	0.092
WR/KM	0.017	0.090	0.046	0.030	0.146	0.082	0.049	0.237	0.128
KJ	0.016	0.143	0.032	0.013	0.179	0.031	0.049	0.322	0.090
<b>Overall Avg:</b>							<b>0.091</b>		

grains S/100 scf

From 01/05 to 12/05 (ppmv S)

Out of State Suppliers Location	H <sub>2</sub> S			RSH			Total Sulfur*		
	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg
NN	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SN	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WR/KM	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
KJ	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Overall Avg:</b>							<b>0.000</b>		

ppmv S

Assuming 16.9 ppm = 1 grains S/Ccf

\* Includes estimated supplemental odorant based on border guidelines of 50/50 t-butyl mercaptan/thiophane

\*\* SoCalGas Specifications allow up to 0.25 gr. H<sub>2</sub>S/100scf and 0.75 gr. S/100scf Total Sulfur

*The enclosed is provided for information purposes only. The Gas Company has made reasonable efforts to ensure all information is correct and consistent with the applicable Tariffs. To the extent there is any conflict with the Tariffs, the Tariffs shall govern in all cases. In addition, neither The Gas Company's publication nor verbal representations thereof constitutes any statement, recommendation, endorsement, approval or guaranty (either express or implied) of any product or service. Moreover, The Gas Company shall not be responsible for errors or omissions in this publication, for claims or damages relating to the use thereof, even if it has been advised of the possibility of such damages.*

# Alternatives (43-46)

---

## Alternatives Eliminated

43. *Please provide a description of the alternative sites that were considered in the planning and screening phase of AFC preparation, but were eliminated from consideration and not presented in the AFC.*

**Response:** Additional sites were reviewed that did not meet WCE's project objectives and siting criteria. As stated in the AFC, the key objective of the WCEP is to cost-effectively provide the most efficient peaking capacity available to the growing southern California market. An objective of the site selection was to minimize or eliminate the length of project linears, including gas and water supply lines, discharge lines, and transmission interconnections. This objective both minimizes potential offsite environmental impacts and cost of construction. To respond to the need for peaking capacity in Southern California, the Applicant initiated a region-wide search for peaking power sites based on the following criteria:

- Adjacent or near an existing substation where additional peaking capacity would serve growing markets near load centers and provide system stability as well as peaking energy
- Adjacent or near high-pressure natural gas transmission lines
- Adjacent or near recycled water supply for cooling purposes to maximize efficiency
- Adjacent or near non-reclaimable wastewater discharge
- Industrial land use designation with consistent zoning
- A parcel large enough to accommodate the site including construction laydown
- Potential environmental impacts can be mitigated and minimized

The City of Industry/Walnut Substation site fits all of these criteria, and none of the other sites examined did so. It is located adjacent to a substation and requires no offsite pipelines. The other sites were not pursued further because none of them came close to fitting the project objectives and siting criteria as well as the WCEP did.

## Elimination Rationale

44. *Describe the rationale for the elimination of each alternative site.*

**Response:** See response to #43.

## Access Distances

45. *Please also include the locations and distances for access to electrical transmission, natural gas, and water supply for each alternative site.*

**Response:** As stated in the response to #43, the WCEP requires no significant offsite linears. Other sites were not investigated in detail in this regard, but would have required lengthy and costly construction of offsite pipelines and transmission lines.

## Minimum Acreage

46. *Please provide the minimum acreage necessary to accommodate the power plant footprint and construction laydown area.*

**Response:** The WCEP project site is 11.48 acres in size. This size is at or near the minimum size necessary to site the project, including construction laydown areas.

# Cultural Resources (47-60)

---

## Survey Distance

47. *Please specify the distance the survey extended (in feet or meters) from the project site boundaries and from the centerlines of the transmission lines.*

**Response:** The area of potential effect (APE) for archaeological resources is considered the direct impact footprint of the project (as shown in AFC Figure 8.3-1). Pedestrian inventories for archaeological resources were conducted of the entire direct impact area, including the power plant site construction laydown and parking areas, and electrical transmission line route. Surveys for the laydown area extended beyond the power plant site to the north as far as the San Jose Creek Flood Control Channel (see AFC Figure 8.3-1). Because the exact locations of the transmission poles and other potential ground disturbance areas within the transmission alignment were not known, the entire transmission corridor located to the east of the Walnut Substation was surveyed (see AFC Figure 8.3-1).

The APE for the built environment included all areas near the project site that could contain historic buildings and structures and from which the project would have a visual effect on setting. This was defined as the area within one legal parcel of the WCEP project site on all sides.

Inventories for historic buildings and structures were conducted by reconnaissance inspection of these adjacent parcels to determine whether or not these might contain historic buildings and structures that the project might affect visually or in some other way.

## Transmission Line Age

48. *The AFC states that the SCE transmission line corridors were surveyed, but the age of the transmission lines was not provided. Please provide the age of the transmission lines located immediately north and southwest of the project site.*

**Response:** A transmission line labeled “Edison Power Line” is depicted on the 1924 and 1927 Baldwin Park USGS 1:24,000 maps (see Attachment CR-2) in an alignment that generally corresponds to the existing transmission line corridor north of the project. Features appearing at regular intervals that appear to be transmission poles are visible on the 1928 aerial photograph (Attachment CR-1), but are not readily visible on later aerial photographs (1938, 1949, 1952). This transmission line is also not visible on the 1:62,500-scale 1946 topographic map, but at this scale, the USGS apparently did not map transmission lines. The transmission line towers present today first appear in the 1966 Baldwin Park USGS 7.5-minute quadrangle, entering and exiting the Walnut Substation. It is most likely that the early transmission line was present until the construction of the existing lines, and was replaced by two rows of steel lattice towers and a wooden-pole line during the 1960s.

## San Jose Creek FCC Age

49. *Please provide the age of the San Jose Creek Flood Control Channel located beyond the SCE transmission lines immediately north of the site.*

**Response:** The San Jose Creek Flood Control Channel is present on the 1968 aerial photograph (Attachment CR-1), but is not present on the 1966 Baldwin Park USGS 7.5-minute quadrangle (Attachment CR-2). Therefore, the channel is less than 40 years in age.

## UPRR Inventory Record

50. *The AFC identified the Union Pacific Railroad track located immediately south of the project site as a resource listed on the California Historic Resources Inventory Site 19-186112.*

- *Please provide the age of the portion of railroad adjacent to the project site.*
- *Please discuss whether this particular portion of the railroad is recorded.*
- *Please provide a copy of the record for Inventory Site 19-186112.*

**Response:** The site record for the Southern Pacific Railroad segments in the project area (Site 19-186112) is included in Attachment CR-3. The railroad segment located immediately south of the project site is included in the site record, and is recorded as part of the Southern Pacific Railroad system constructed in the 1870s.

## Walnut Substation DPR 523

51. *The Walnut Substation appears in black on Figure 1, Photorevised 1953 (Appendix 8.14A), indicating that it may be more than 45 years old. Since the project's transmission line will connect to the Walnut Substation, please complete a Department of Parks and Recreation (DPR) 523 form, including the evaluation portion, and provide a copy. The evaluation of the Walnut Substation needs to be completed by or under the direction of someone who meets the Secretary of the Interior Standards for architectural history.*

**Response:** The map in the Phase I Environmental Site Assessment is mislabeled. The correct map reference is the Baldwin Park USGS 7.5-minute quadrangle for 1966, photorevised 1983, not photorevised 1953 (see Attachment CR-2 for a copy of a similar map). According to Southern California Edison (Tom Taylor, Personal Communication, March 31, 2006), the Walnut Substation was built in 1957. Because the substation is older than 45 years, we have completed a DPR-523 form for this property under the direction of a qualified architectural historian and the site record (Attachment CR-3) and resume of the architectural historian (Attachment CR-4) are attached. Preliminary indications are that the substation may have undergone substantial modification during the 1960s that may have damaged its historical integrity. Additional information is necessary to develop the historic context for this property before making a definitive evaluation of the eligibility of this property for listing in the National Register of Historic Places or California Register of Historical Resources and that information has been requested from Southern California Edison and is forthcoming. In the meantime, it appears unlikely that this property will be found eligible for listing as a historic site. In the event, however, that it were found to be historic, it is clear that the project's effect on this property would be negligible and would not detract from any attributes of historic significance. The WCEP's connection to the Walnut Substation would not alter the substation substantially except to make a connection to it from a transmission line. This line would be added to the several lines that already connect. Therefore, the WCEP connection would be entirely in keeping with existing uses and could not be considered an adverse effect.

## Record Search Information

52. *Please provide copies of all the information obtained from the South Central California Information Center of the California Historical Resources Information System (CHRIS) including the previous survey reports identified in AFC Table 8.3-1 and any DPR forms. Since the CHRIS annotates a map showing the location of cultural resources indicated in color, please provide a color copy of the map indicating the location of cultural resources. Since it is likely that the location of archaeological sites will be revealed in this information, please provide the information under confidential cover. Note that 3 copies of this confidential material will be sufficient.*

**Response:** Three copies of the entire literature search data provided by the South Central California Information Center of the California Historical Resources Information System (CHRIS) are being filed separately under a request for confidentiality.

## Native American Response

53. *Please provide copies of any additional written responses from Native Americans. If responses are received by telephone, please provide a summary of each conversation. If the location of archaeological sites may be revealed in the information, please provide it under confidential cover.*

**Response:** One letter response was received from the Gabriolino of Band Mission Indians and is attached (Attachment CR-5). A comprehensive updated summary table of contacts with Native Americans is attached. There were no cultural resources sites identified through Native American consultation.

## Native American Telephone Contact

54. *In keeping with guidance from the NAHC, please conduct a minimum of two telephone calls to Native American groups or individuals who were identified on the list provided by the NAHC. Provide a summary of conversations that includes whether the information sent by the applicant has been received and whether there are any concerns regarding cultural resources in the vicinity of the project.*

**Response:** A comprehensive updated summary table of contacts with Native Americans is attached (Attachment CR-5).

## Local Registers

55. *Please review local registers maintained by the City of Industry and the County of Los Angeles and provide a list of any cultural resources (prehistoric or historic archaeological or historic built environment) listed by the City and County within the ½-mile study area.*

**Response:** The City of Los Angeles Cultural Monuments listings were reviewed as part of the CHRIS literature search, and found no results within ½ mile of the project site. A summary table of contact attempts to local historical societies is attached (Attachment CR-6). Local historic sites in the City of Industry include the John Rowland House and Workman-Temple Homestead Museum, and associated El Campo Santo Cemetery. These are identified on the attached figure DR57-1, but both sites are located further than ½ mile away from the project site. The project will not affect them. There were no cultural resources sites identified through consultation with local historical societies.

## Historical and Archaeological Organizations

56. *Please provide a discussion of the local historical and archaeological organizations that were contacted. Include information regarding responses that were received and historical or archaeological resources that were identified.*

**Response:** See response to Data Request #55.

## Figure 8.3-1

57. *Please provide a revised version of Figure 8.3-1 that identifies the location of the following:*

- a. *The location of any cultural resources that were identified from information provided by Native Americans;*
- b. *Any cultural resources identified within the ½-mile study area during the following activities: the literature search, contacts with local archaeological and historical societies, and review of the City and County registers.*

**Response:** Figure DR57-1, attached (Attachment CR-3), depicts Site 19-186112, the Southern Pacific Railroad. No other cultural resources are identified within ½ mile of the project site. This figure also shows the locations of the John Rowland House and Workman-Temple Homestead. These are local historic landmarks that are located further than ½ mile from the project site. The WCEP would not affect them. There were no cultural resources identified through contacts with Native American organizations or local historical or archaeological societies.

## Proposed Projects

58. *Please provide a list and description of development projects that have been proposed or are under construction that will be located within a ½ -mile radius of the proposed WCEP. The descriptions should include information regarding whether a development is proposed or under construction, whether it will cause ground disturbance, and the dimensions of the proposed project.*

**Response:** The AFC did not consider the potential effects of cumulative impacts on cultural resources because there are no significant cultural resources on which the project would have any adverse affect. Cumulative impacts are impacts of the project that may be insignificant but that could reach a level of significance when combined with the effects of other projects. If the project would cause no adverse impacts, then it could not contribute to cumulative impacts.

## Proposed Project Map

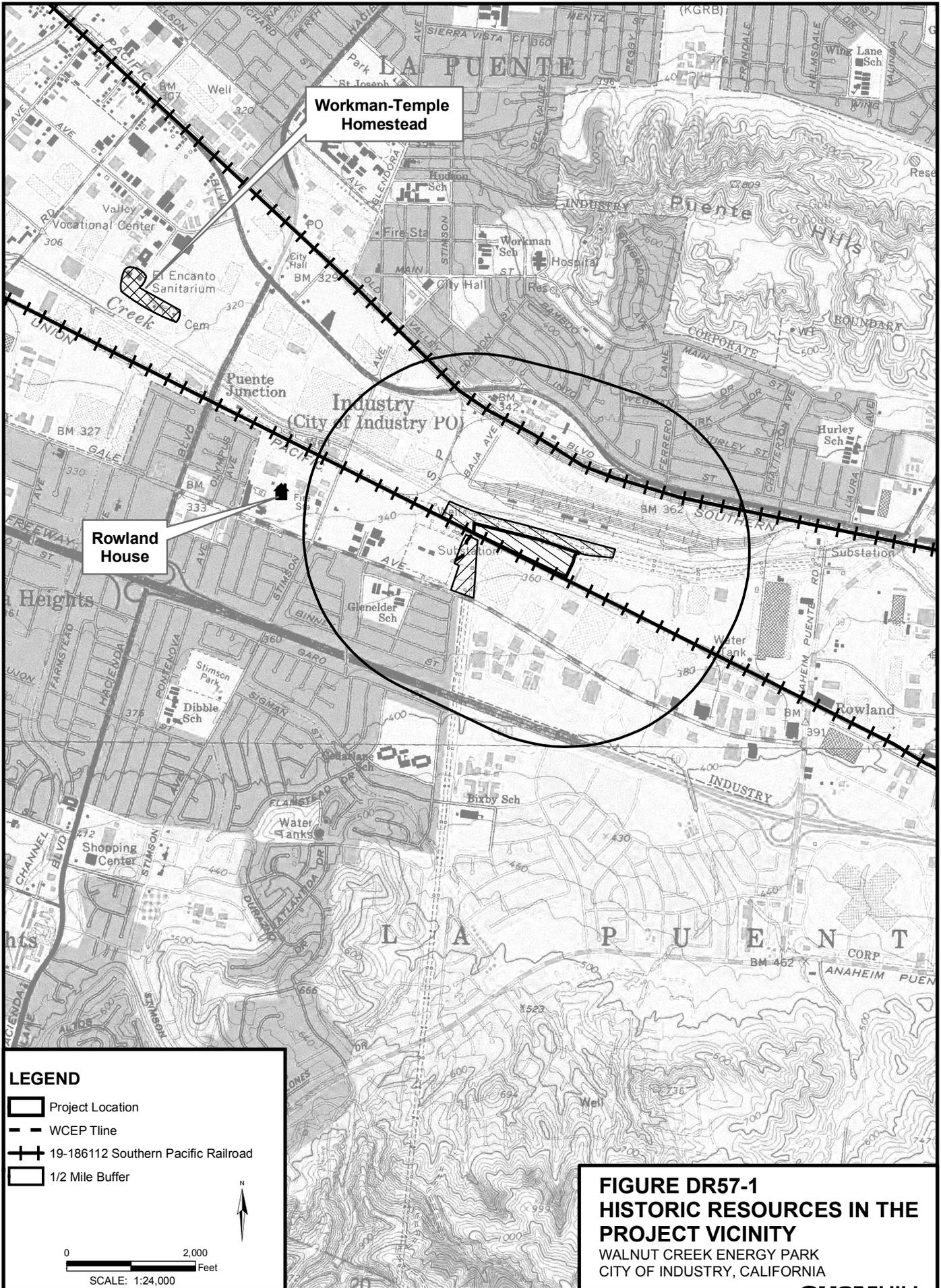
59. *Please provide a map at 1:24,000 scale that shows the WCEP site and linear facilities in relation to all the proposed development projects within ½ mile of the WCEP project.*

**Response:** See response to Data Request #58.

## Historic Maps

60. *Please provide copies of historic topographic maps (as referenced on page 11 of the Phase I Environmental Site Assessment) from the years 1898, 1927, 1946, and 1966.*

**Response:** The maps are provided in Attachment CR-2.



**Workman-Temple Homestead**

**Rowland House**

**LEGEND**

- Project Location
- WCEP Tline
- 19-186112 Southern Pacific Railroad
- 1/2 Mile Buffer

N

0 2,000  
Feet

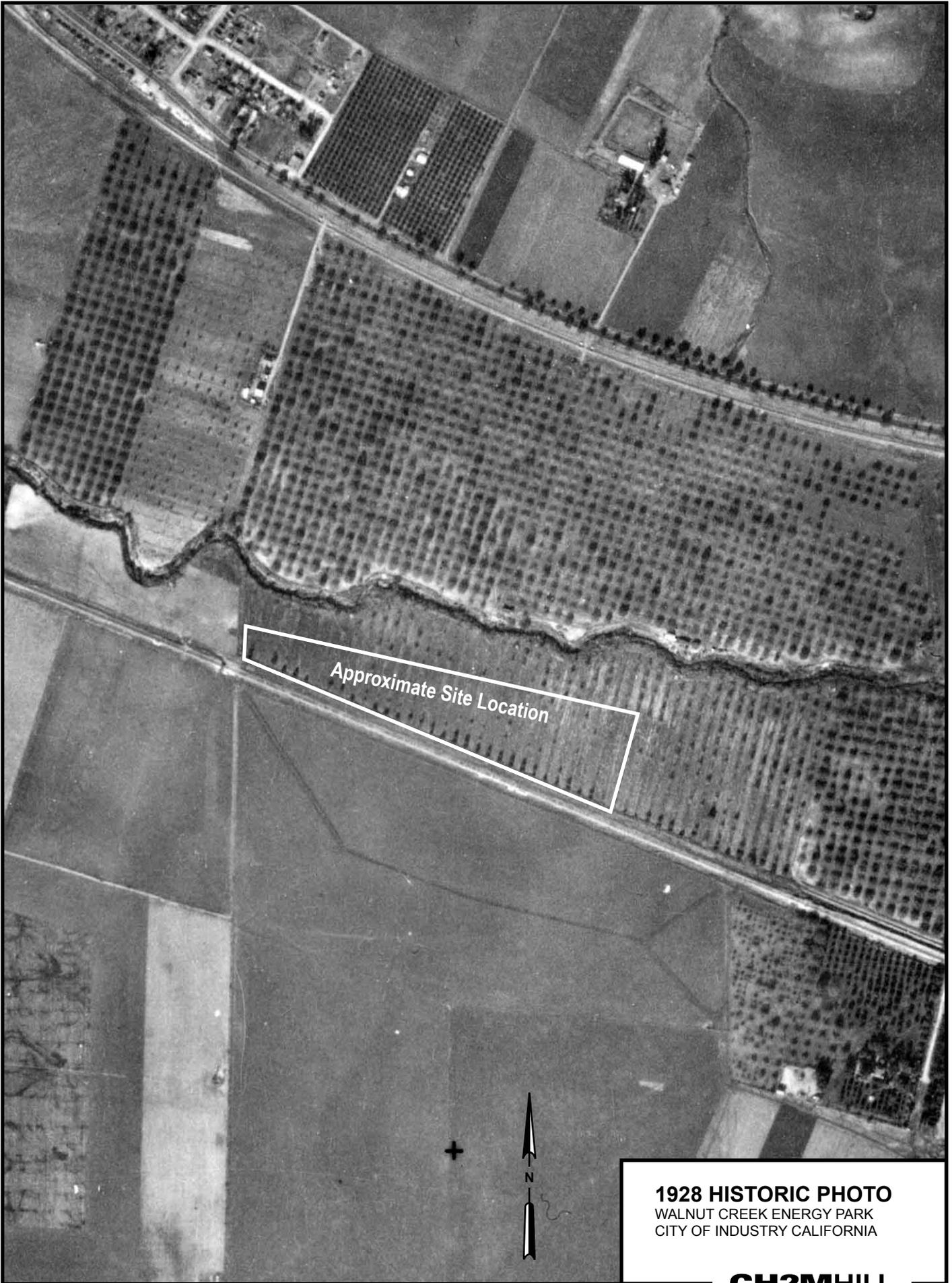
SCALE: 1:24,000

**FIGURE DR57-1  
HISTORIC RESOURCES IN THE  
PROJECT VICINITY**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA

# Attachment CR-1

Historic Air Photographs

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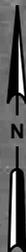
Approximate Site Location



**1928 HISTORIC PHOTO**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY CALIFORNIA



Approximate Site Location



**1938 HISTORIC PHOTO**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY CALIFORNIA

**CH2MHILL**



Approximate Site Location

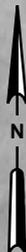


**1949 HISTORIC PHOTO**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY CALIFORNIA

**CH2MHILL**



Approximate Site Location



**1952 HISTORIC PHOTO**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY CALIFORNIA

**CH2MHILL**



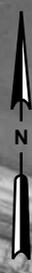
Approximate Site Location

**1968 HISTORIC PHOTO**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY CALIFORNIA

**CH2MHILL**



Approximate Site Location



**1976 HISTORIC PHOTO**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY CALIFORNIA

**CH2MHILL**



**1989 HISTORIC PHOTO**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY CALIFORNIA

**CH2MHILL**

# Attachment CR-2

Topographic Maps

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**EDR™** Environmental  
Data Resources Inc

**EDR Historical  
Topographic Map  
Report**

**Walnut Substation  
S. Bixby Dr./E. Chestnut St.  
Hacienda Heights, CA 91745**

**Inquiry Number: 1414351.10**

**May 06, 2005**

**The Standard in  
Environmental Risk  
Management Information**

440 Wheelers Farms Road  
Milford, Connecticut 06460

**Nationwide Customer Service**

Telephone: 1-800-352-0050  
Fax: 1-800-231-6802  
Internet: [www.edrnet.com](http://www.edrnet.com)

## EDR Historical Topographic Map Report

Environmental Data Resources, Inc.'s (EDR) Historical Topographic Map Report is designed to assist professionals in evaluating potential liability on a target property, and its surrounding area, resulting from past activities. ASTM E 1527-00, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM standard requires a review of *reasonably ascertainable standard historical sources*. *Reasonably ascertainable is defined as information that is publicly available, obtainable from a source with reasonable time and cost constraints, and practically reviewable*. To meet the prior use requirements of ASTM E 1527-00, Section 7.3.4, the following *standard historical sources* may be used: aerial photographs, city directories, fire insurance maps, topographic maps, property tax files, land title records (although these cannot be the sole historical source consulted), building department records, or zoning/and use records. ASTM E 1527-00 requires *"All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful."* (ASTM E 1527-00, Section 7.3.2 page 12.)

EDR's Historical Topographic Map Report includes a search of available public and private color historical topographic map collections.

### Topographic Maps

A topographic map (topo) is a color coded line-and-symbol representation of natural and selected artificial features plotted to a scale. Topos show the shape, elevation, and development of the terrain in precise detail by using contour lines and color coded symbols. Many features are shown by lines that may be straight, curved, solid, dashed, dotted, or in any combination. The colors of the lines usually indicate similar classes of information. For example, topographic contours (brown); lakes, streams, irrigation ditches, etc. (blue); land grids and important roads (red); secondary roads and trails, railroads, boundaries, etc. (black); and features that have been updated using aerial photography, but not field verified, such as disturbed land areas (e.g., gravel pits) and newly developed water bodies (purple).

For more than a century, the USGS has been creating and revising topographic maps for the entire country at a variety of scales. There are about 60,000 U.S. Geological Survey (USGS) produced topo maps covering the United States. Each map covers a specific quadrangle (quad) defined as a four-sided area bounded by latitude and longitude. Historical topographic maps are a valuable historical resource for documenting the prior use of a property and its surrounding area, and due to their frequent availability can be particularly helpful when other standard historical sources (such as city directories, fire insurance maps, or aerial photographs) are not reasonably ascertainable.

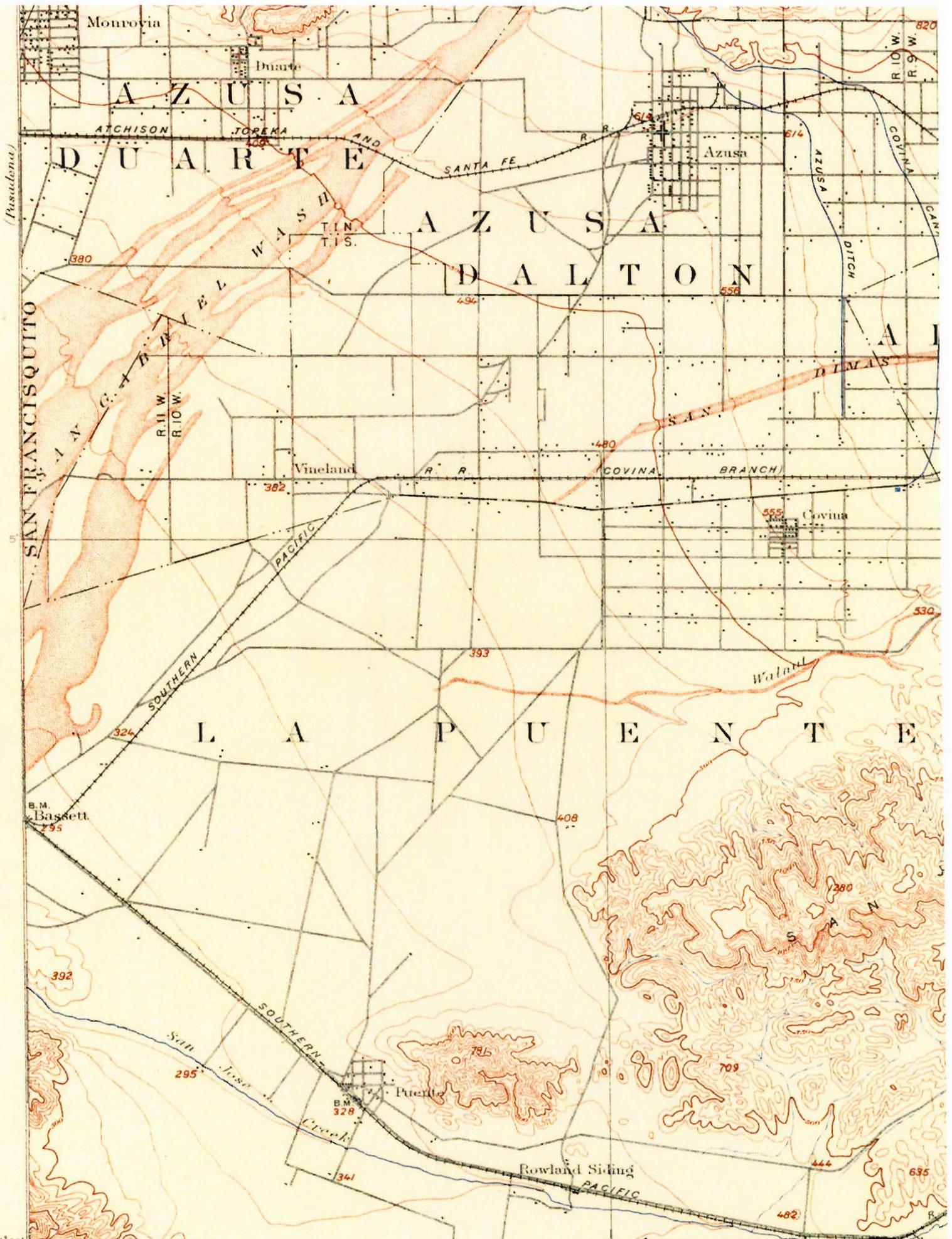
### Disclaimer - Copyright and Trademark Notice

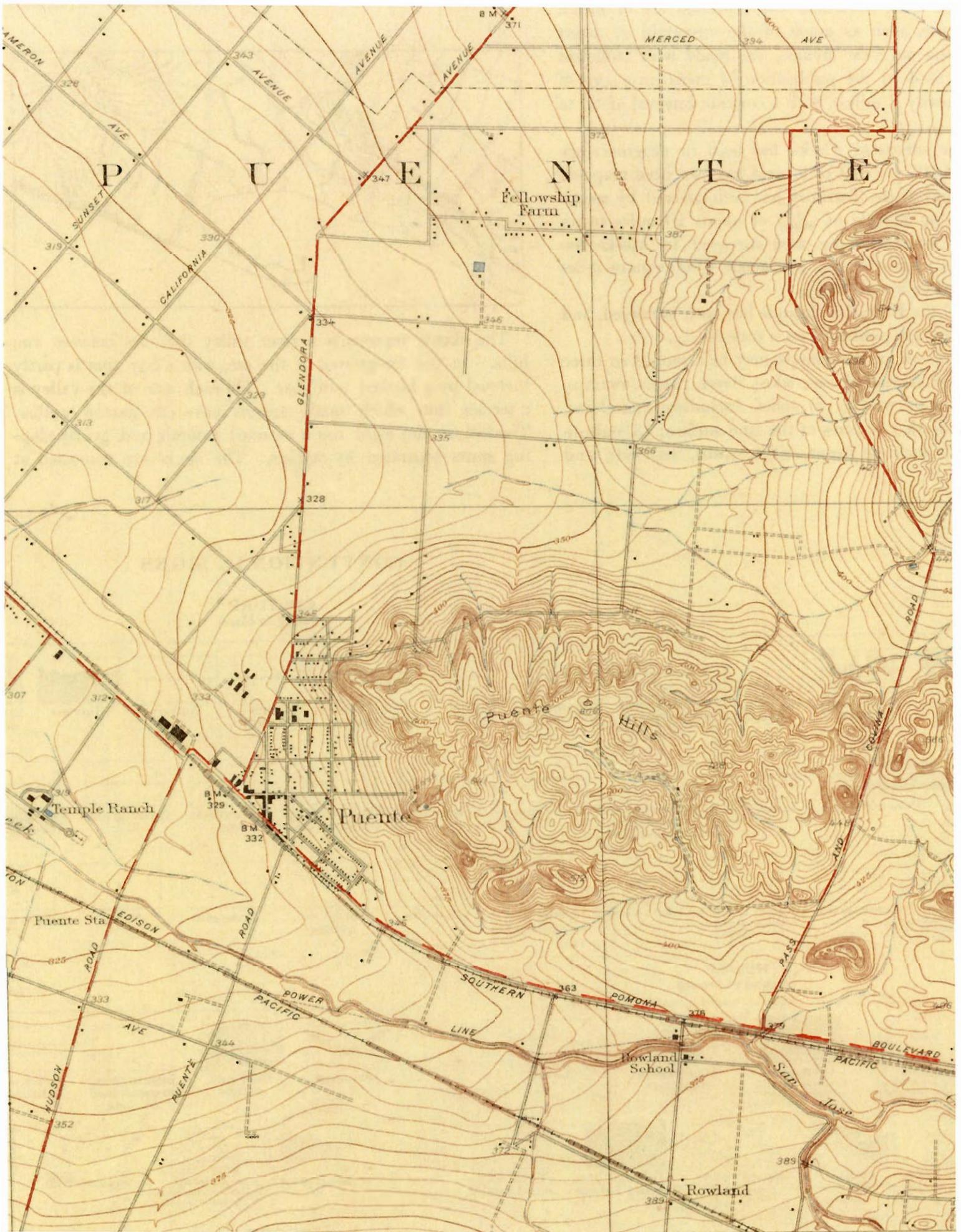
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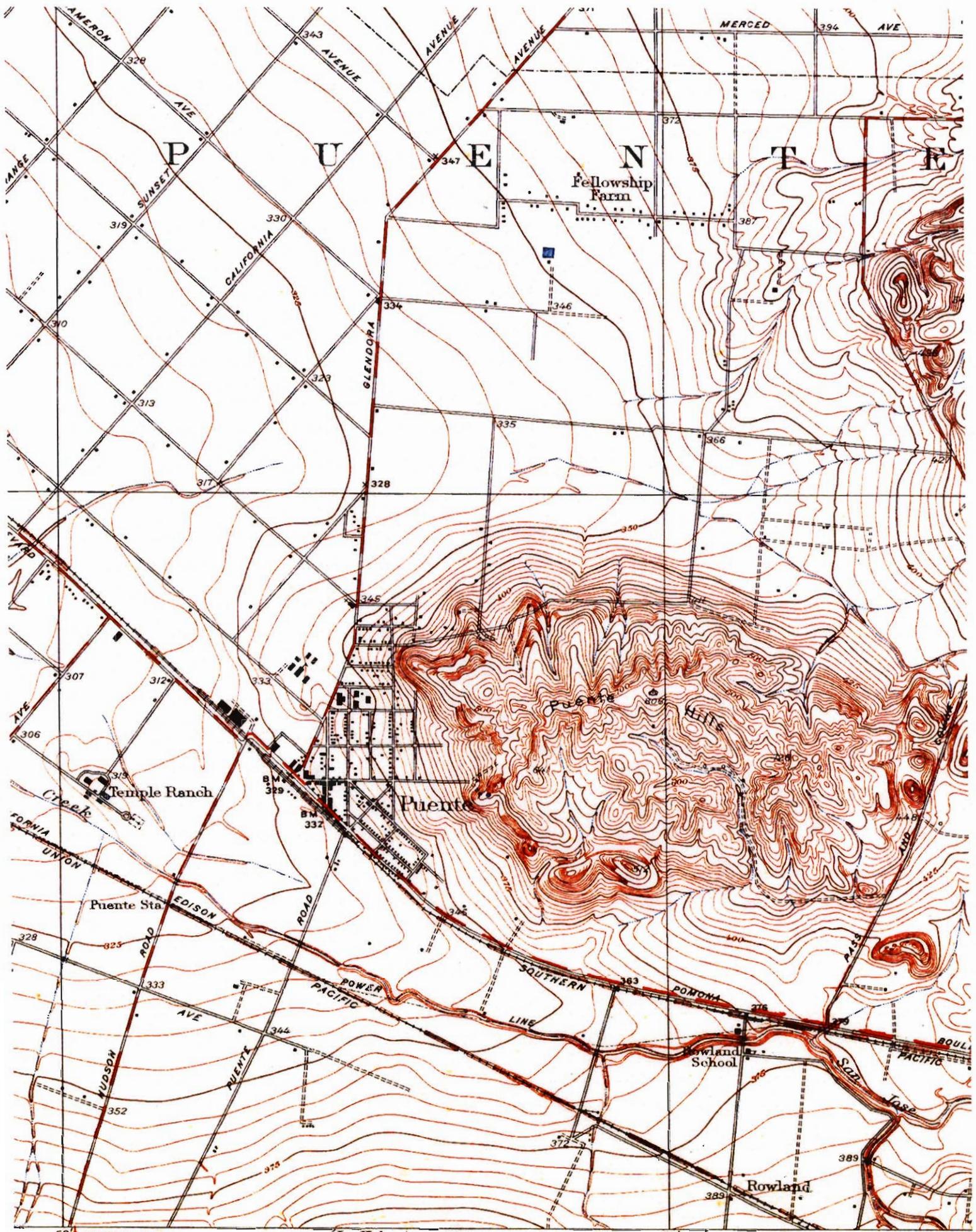
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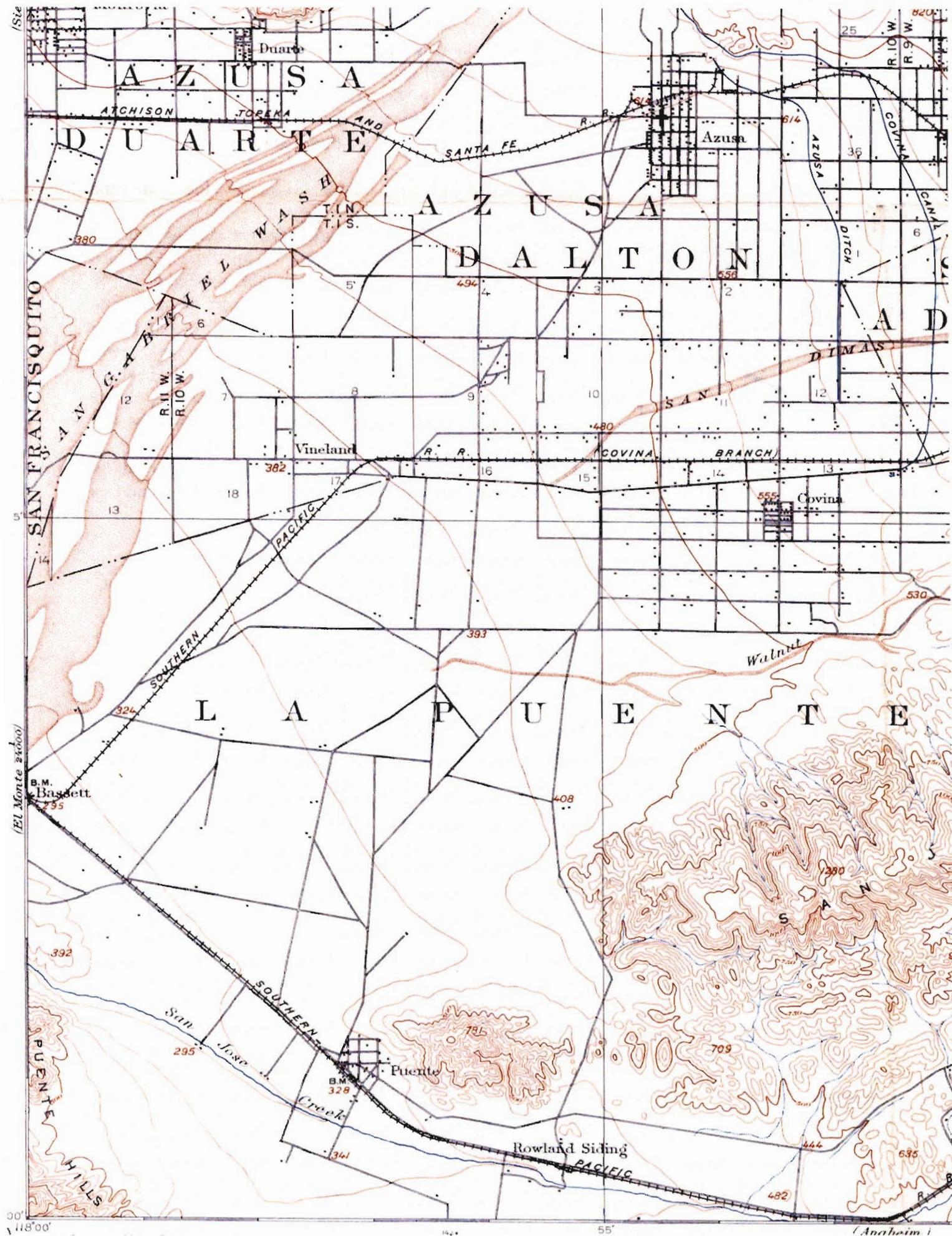




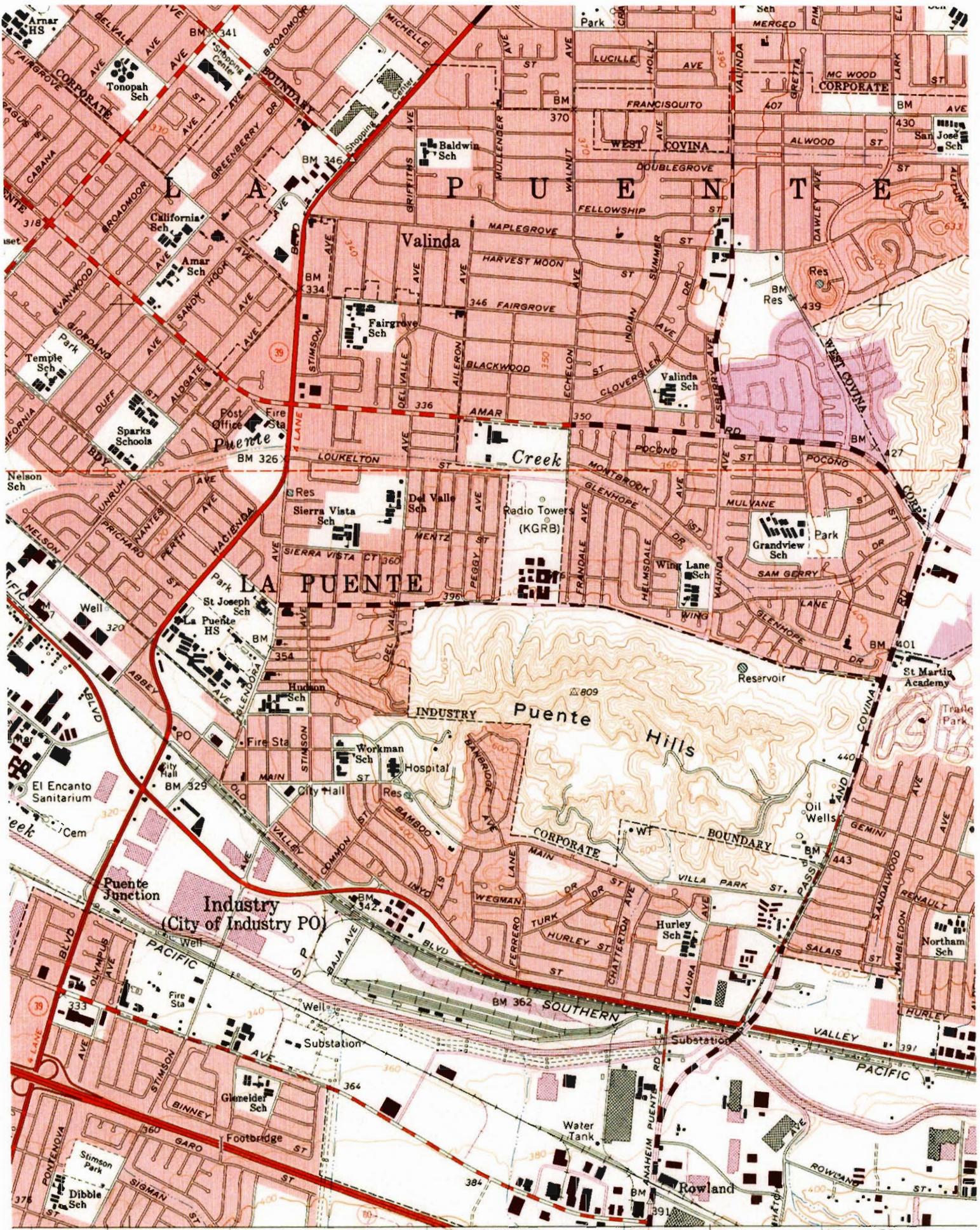
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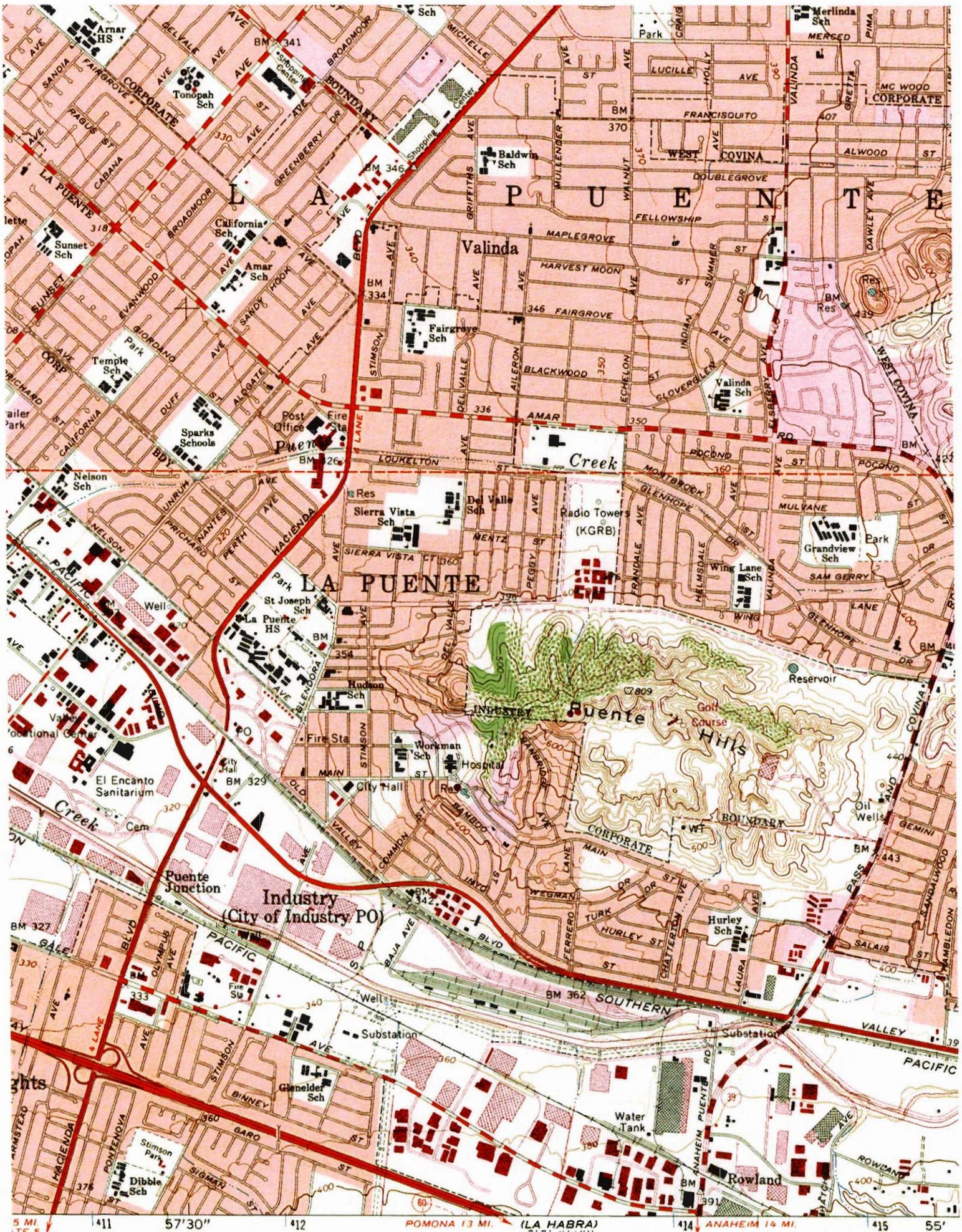
(La Habra)

56









# Attachment CR-3

DPR-523 Forms

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Primary # \_\_\_\_\_  
 HRI # 19-186112  
 Trinomial \_\_\_\_\_  
 NRHP Status Code \_\_\_\_\_

Other Listings \_\_\_\_\_  
 Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 12

\*Resource Name or #: (Assigned by Recorder) C-Los Angeles-A-1

P1. Other Identifier: Union Pacific Railroad, Southern Pacific Railroad

\*P2. Location:  Not for Publication  Unrestricted

\*a. County Los Angeles and Orange Riverside San Bernardino

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

\*b. USGS 7.5' Quad see below Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M.

c. Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

d. UTM: (Give more than one for large and/or linear resources) Zone: \_\_\_\_\_; \_\_\_\_\_ mE/ \_\_\_\_\_ mN

e. Other Locational Data: (e.g. parcel #, directions to resource, elevation, etc., as appropriate)

This segment of the railroad is located on the following USGS quads: Los Angeles (1966, PR 1981), El Monte (PR 1994), Baldwin Park (PR 1981), La Habra (PR 1981), San Dimas (PR 1981), Ontario (PR 1981), Guasti (PR 1981), Fontana (PR 1980), and San Bernardino South (PR 1980).

\*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

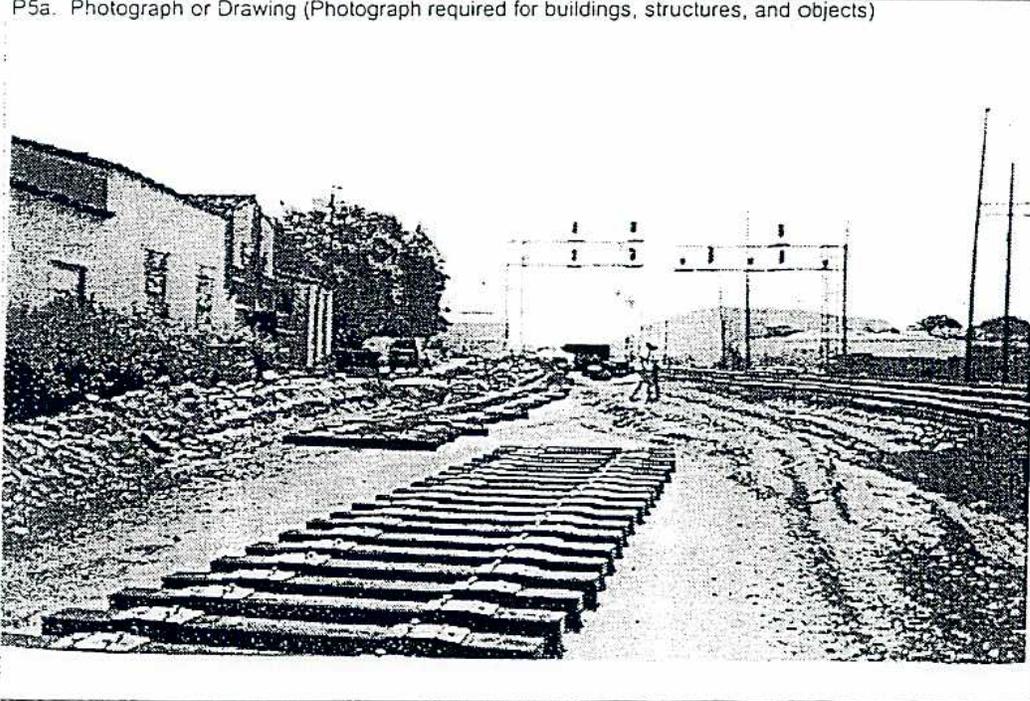
The Union Pacific Railroad (historically the Southern Pacific Railroad) is a standard gauge railroad which runs through the Los Angeles area. It is part of a larger resource, the Union Pacific Railroad line. Numerous associated features include railroad stations, sidings, spurs, and railyards.

The rail lines that were included in our survey areas were all acquired by Union Pacific, but were originally other railroad lines. These include the Southern Pacific, and the Los Angeles and Salt Lake Railroad. The Southern Pacific through Los Angeles area was constructed in the 1870s, and originally ran south from Los Angeles through Watts and Compton to Willmington, and east from Los Angeles through Alhambra, San Gabriel, Puente, Pomona and on through Colton before heading toward Yuma. ( See continuation sheet.)

\*P3b. Resource Attributes: (List attributes and codes) HP39. Other - Railroad

\*P4. Resources present:  Building  Structure  Object  Site  District  Element of District  Other (isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, accession #) \_\_\_\_\_

\*P6. Date Constructed/Age and

Sources:  Historic  
 Prehistoric  Both  
1870s - present

\*P7. Owner and Address:  
Union Pacific Railroad

\*P8. Recorded by: (Name, affiliation, and address) S. Ashkar  
Jones & Stokes Associates, Inc.  
2500 V Street, Suite 100  
Sacramento, CA 95818

\*P9. Date Recorded: 6/22/99

\*P10. Survey Type: (Describe)  
Cursory and Intensive pedestrian  
surveys

\*P11. Report Citation: (Cite survey report and other sources, or enter "none.") Jones & Stokes. 1999. Cultural Resources Inventory for the Williams Communication Fiber Optic alignment between Los Angeles and Riverside, Los Angeles and Riverside Counties, California.

\*Attachments:  NONE  Location Map  Sketch Map  Continuation Sheet  Building, Structure, and Object Record  
 Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  
 Artifact Record  Photograph Record  Other (List): \_\_\_\_\_

**BUILDING, STRUCTURE, AND OBJECT RECORD**

Page 2 of 12

\*NRHP Status Code

\*Resource Name or # (Assigned by recorder) C-Los Angeles-A-1

B1. Historic Name: Southern Pacific Railroad

B2. Common Name: Union Pacific Railroad

B3. Original Use: railroad

B4. Present Use: railroad

\*B5. Architectural Style:

\*B6. Construction History: (Construction date, alterations, and date of alterations)

Major portion of track and associated spurs, sidings, and station were constructed between 1869 and 1905. The tracks are currently in use and maintenance and replacement continue.

\*B7. Moved?  No  Yes  Unknown Date: Original Location:

\*B8. Related Features:

Numerous sidings; spurs, stations and railyards

B9a. Architect:

b. Builder:

\*B10. Significance: Theme: Railroad

Area: California, U.S.

Period of Significance: 1869 to present

Property Type: railroad

Applicable Criteria: A, B

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

Portions of this railroad are additions to the first transcontinental railroad. Other portions were instrumental in the development of Los Angeles and other communities as business centers. The modern Union Pacific Railroad system is made up of other, often smaller historic railroads that helped to form the economy and population of Southern California. The rail system enabled the transportation of goods to ports and the emmigration of large numbers of people. The railroad is also associated with a number of important historical figures, including the Big Four (Mark Hopkins, Collis P. Huntington, Leland Stanford, and Charles Crocker). Therefore, the historic railroad is eligible for NRHP listing under Criteria A and B.

B11. Additional Resource Attributes: (List attributes and codes)

\*B12. References:

B13. Remarks:

\*B14. Evaluator: S. Ashkar Jones & Stokes

2600 V Street, Suite 100 Sacramento, CA 95818-1914

\*Date of Evaluation: 6/22/99

(This space reserved for official comments.)

(Sketch Map with north arrow required.)

CONTINUATION SHEET

Primary # 19-186112  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_

Page 3 of 12

\*Resource Name or # (Assigned by recorder) C-Los Angeles-A-1

\*Recorded by S. Ashkar, M. Avina, E. Prendergast, J. Doty

\*Date 6/22/99

Continuation

Update

P3a. Description

Another Southern Pacific Line headed southeast from Watts through Norwalk and Buena Park to Santa Ana.

The San Pedro, Los Angeles and Salt Lake Railroad Company was formed in 1901 for the purpose of constructing a rail line between Los Angeles and Salt Lake City. The line formally opened on May 1, 1905. The line extended north from Los Angeles to Las Vegas and on to Salt Lake City. Other lines ran from Los Angeles south to Wilmington via Bells and Workman, and east from Los Angeles through Pico, Clayton, paralleling the Southern Pacific line through Walnut, Sprada and Ontario and dipping south from there towards Riverside. The name was shortened to the Los Angeles and Salt Lake in 1916. In 1921, the line became the southwestern arm of the Union Pacific. (Fickewirth 1992; Hofsommer 1986; Myrick 1992.)

The Southern Pacific eventually absorbed the smaller rail lines and the Southern Pacific emerged as the name for the system in 1884 when the Southern Pacific Company of Kentucky was incorporated.

References:

Fickewirth, A. A. 1992. *California Railroads*. Golden West Books. San Marino, California

Hofsommer, Don L. 1986. *The Southern Pacific, 1901-1985*. Texas A & M University Press. College Station, Texas.

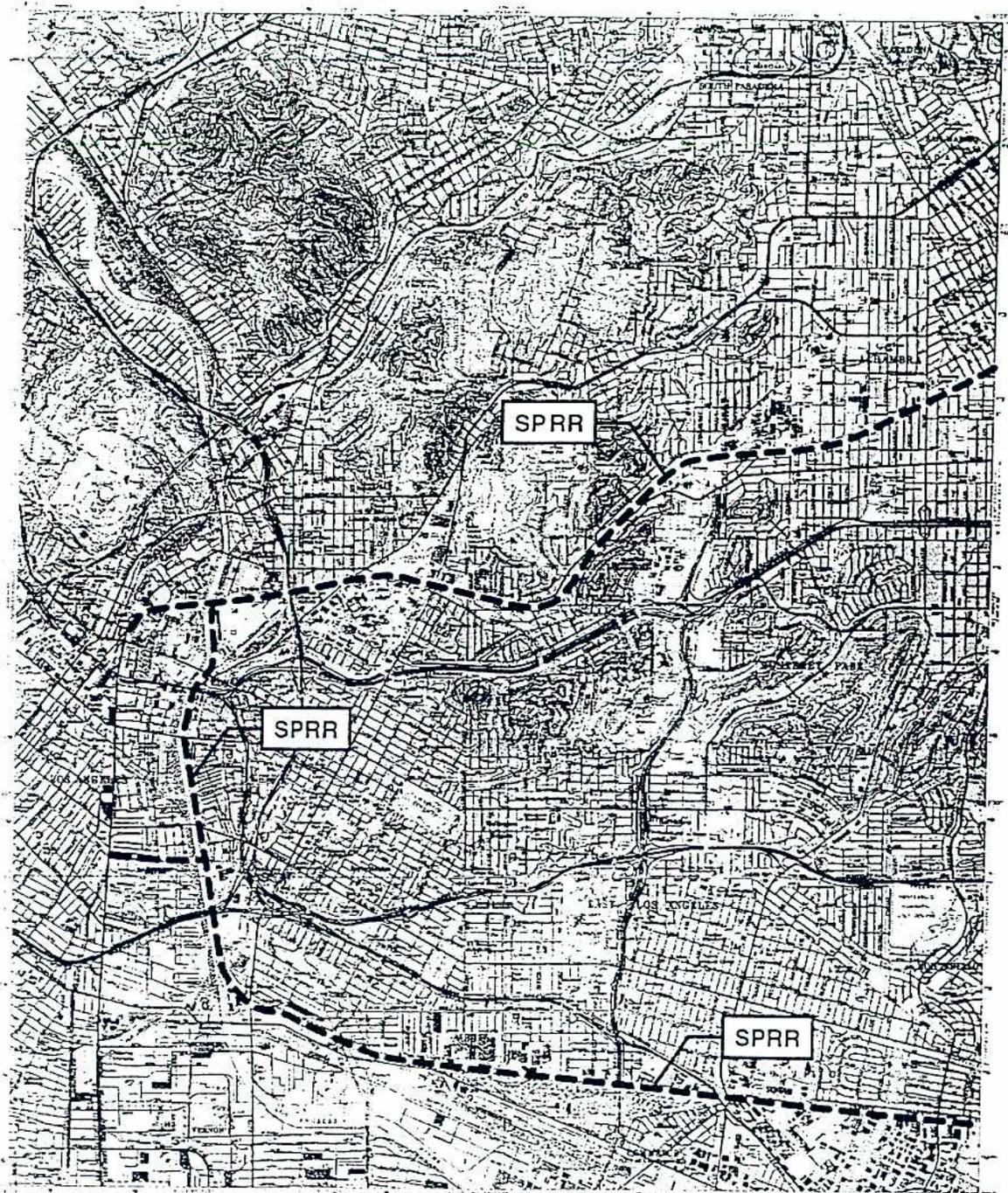
Myrick, D. F. 1992. *Railroads of Nevada and Eastern California. Volume II. Southern Roads*. University of Nevada Press. Reno, Nevada.

# LOCATION MAP

Page 4 of 12

\*Resource Name or #: C-Los Angeles - A-1; Southern Pacific Railroad

\*Map Name: Los Angeles, California \*Scale: 1:80,000 (1"=6.666') \*Date of Map: MR 1994



Scale = 1:80,000

Base map: USGS 7.5 series Los Angeles,  
California quadrangle (1966, MR 1994)

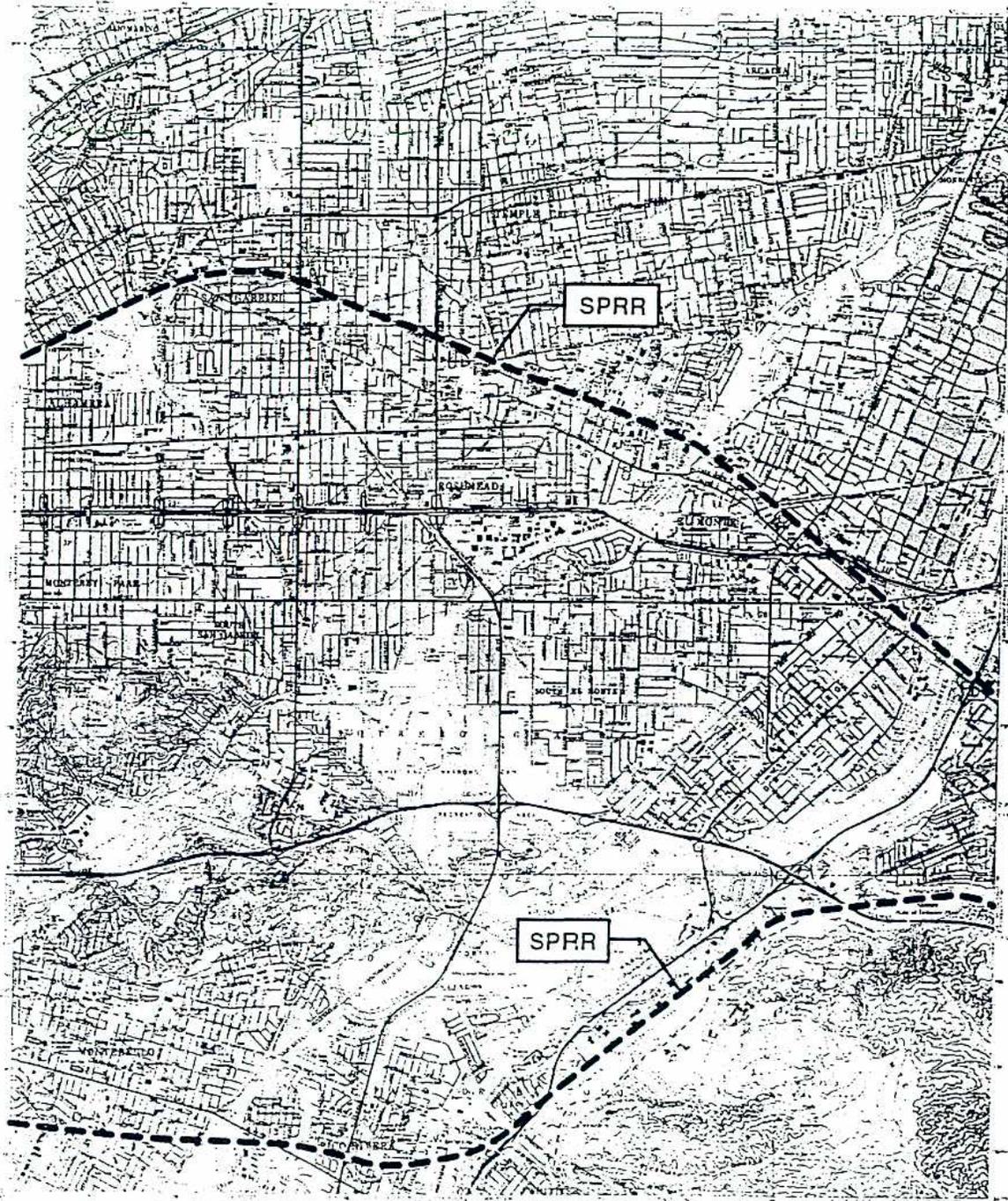


# LOCATION MAP

Page 5 of 12

\*Resource Name or #: C-Los Angeles - A-1: Southern Pacific Railroad

\*Map Name: El Monte, California \*Scale: 1:80,000 (1"=6.666') \*Date of Map: MR 1994



Scale = 1:80,000

Base map: USGS 7.5-series El Monte, California, quadrangle (1966, MR 1994)



# LOCATION MAP

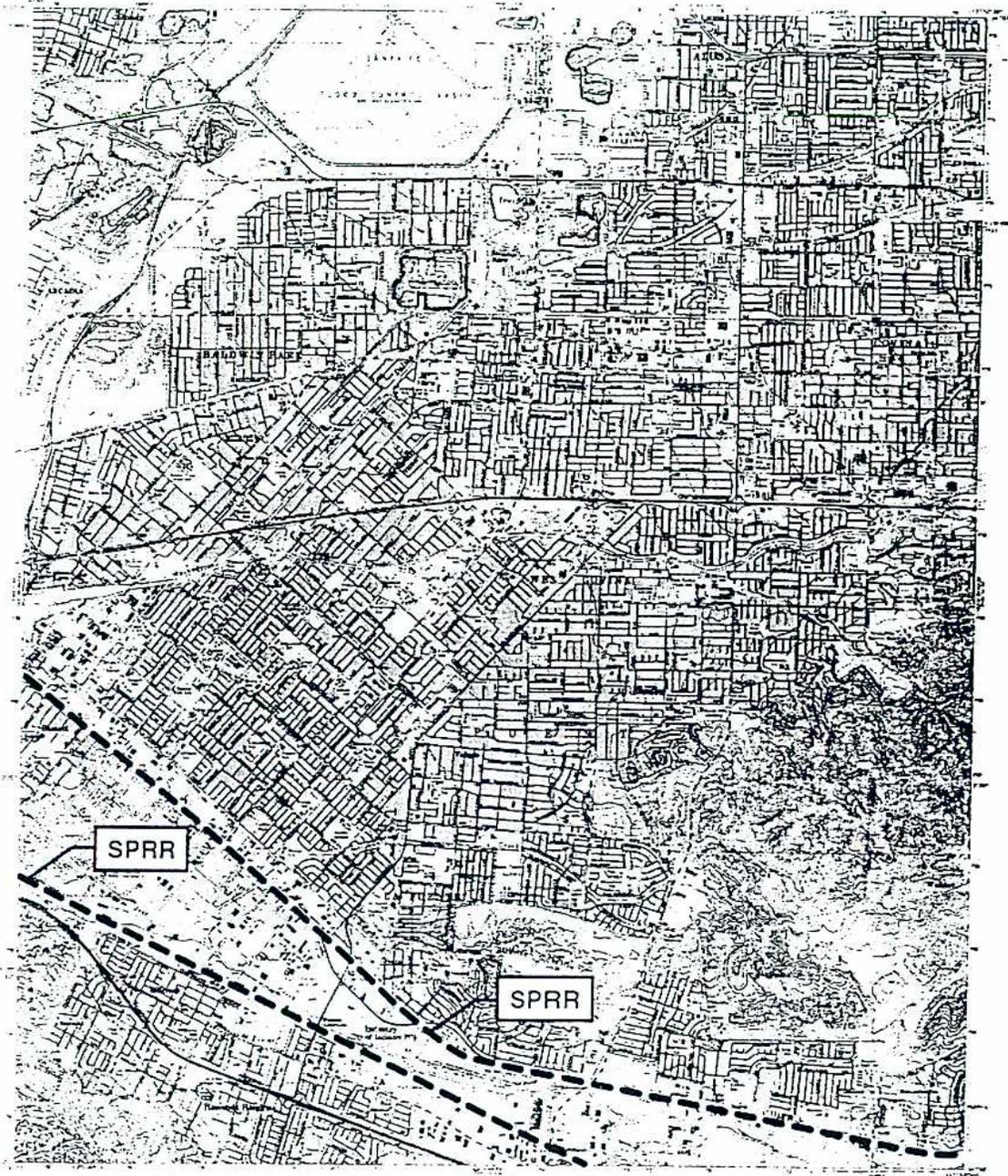
Page 6 of 12

\*Resource Name or #: C-Los Angeles - A-1; Southern Pacific Railroad

\*Map Name: Baldwin Park, California

\*Scale: 1:80,000 (1"=6,666')

\*Date of Map: PR 1981



Scale = 1:80,000

Base map: USGS 7.5-series Baldwin Park, California quadrangle (1966, PR 1981)



# LOCATION MAP

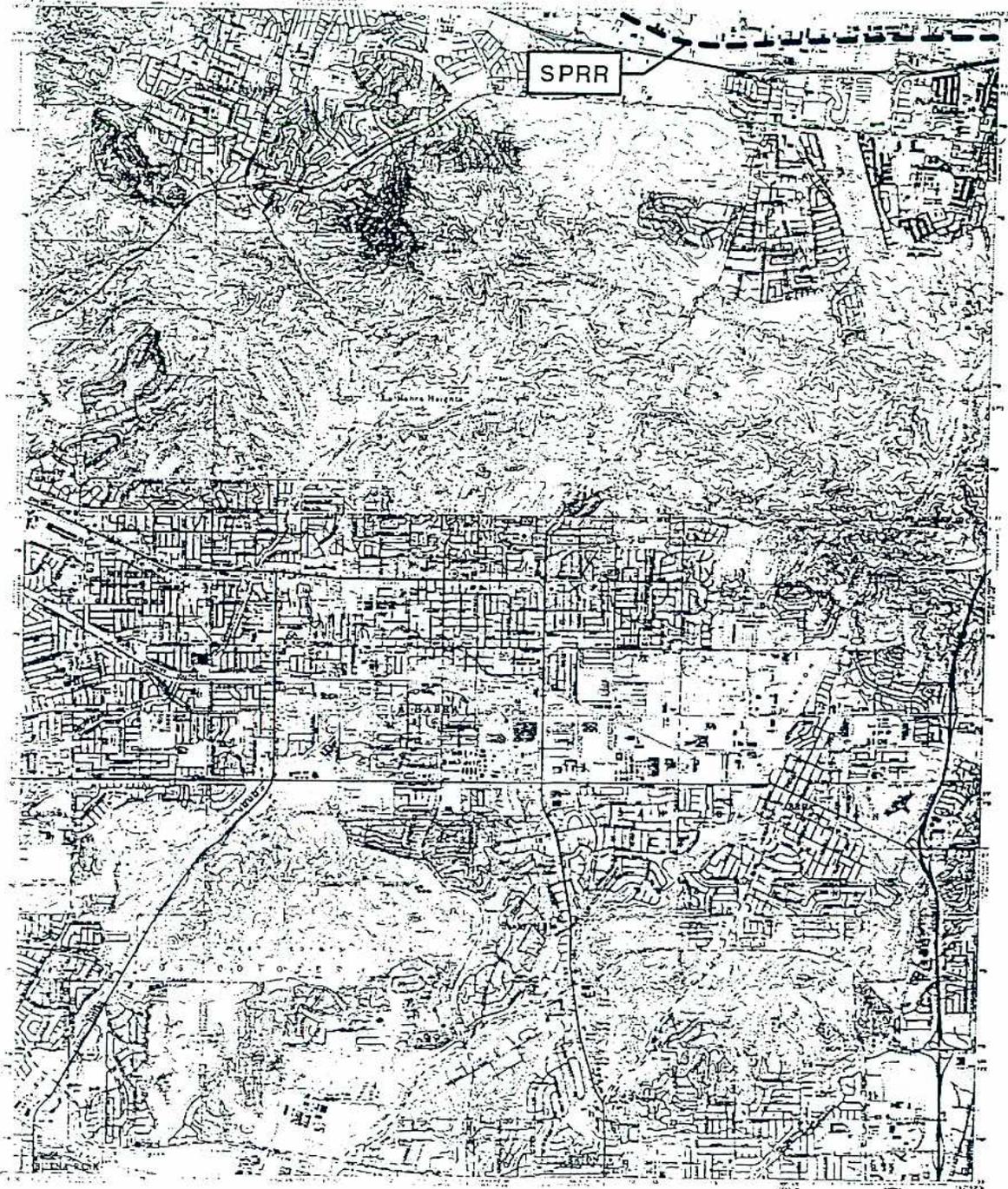
Page 7 of 12

\*Resource Name or #: C-Los Angeles - A-1; Southern Pacific Railroad

\*Map Name: La Habra, California

\*Scale: 1:80,000 (1"=6,666')

\*Date of Map: PR 1981



0 5,000

feet

Scale = 1:80,000

Base map: USGS 7.5-series La Habra,  
California quadrangle (1954; PR 1981)



# LOCATION MAP

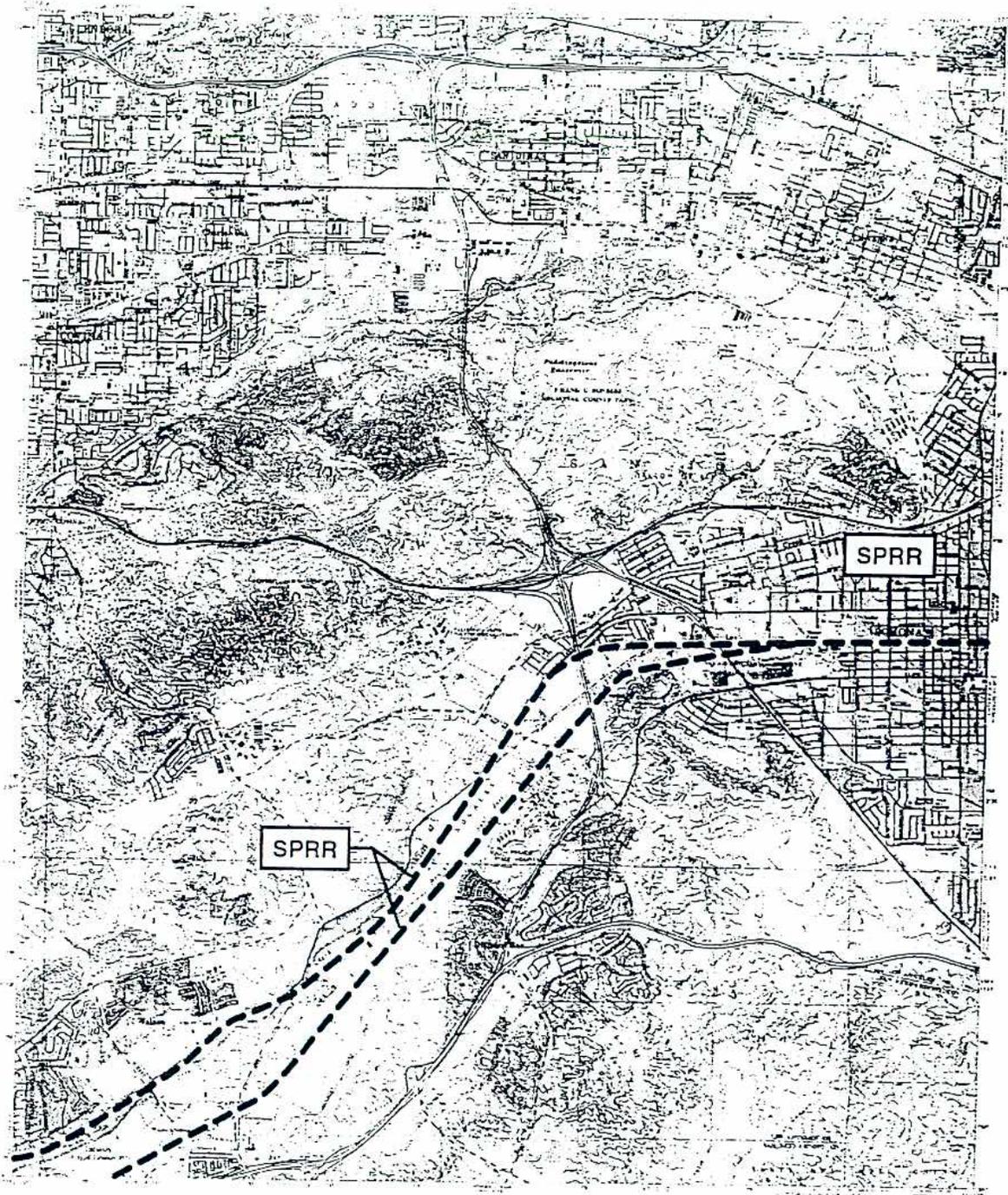
Page 8 of 12

\*Resource Name or #: C-Los Angeles - A-1; Southern Pacific Railroad

\*Map Name: San Dimas, California

\*Scale: 1:80,000 (1"=6,666')

\*Date of Map: PR 1981



0 5 000

feet

Scale = 1:80,000

Base map: USGS 7.5'-series San Dimas,  
California, quadrangle (1966, PR 1981)



# LOCATION MAP

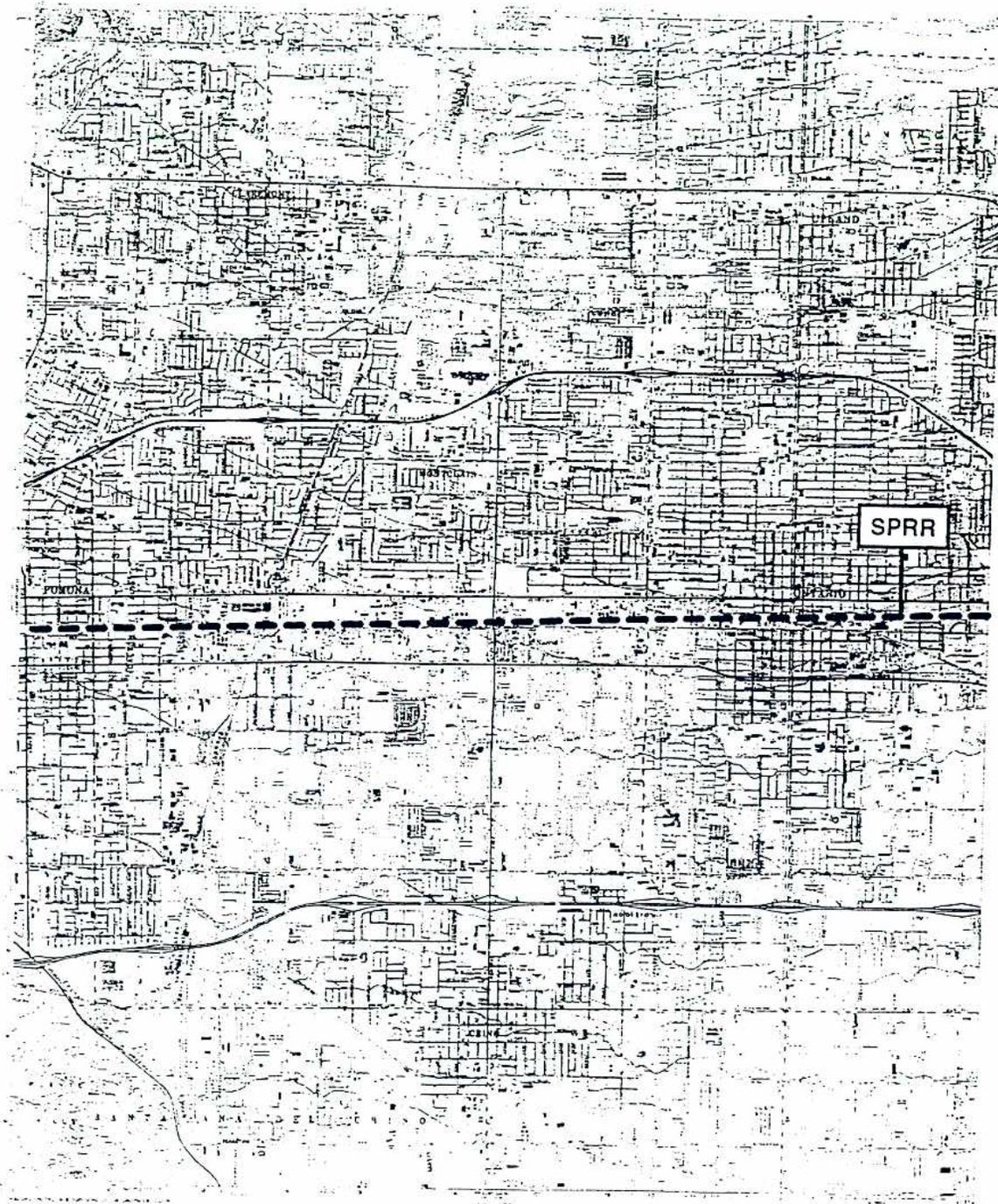
Page 9 of 12

\*Resource Name or #: C-Los Angeles - A-1: Southern Pacific Railroad

\*Map Name: Ontario, California

\*Scale: 1:80,000 (1"=6.666')

\*Date of Map: PR 1981



0 5,000

feet

Scale = 1:80,000

Base map: USGS 7.5-series Ontario,  
California, quadrangle (1967, PR 1981)

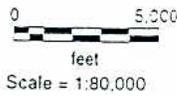
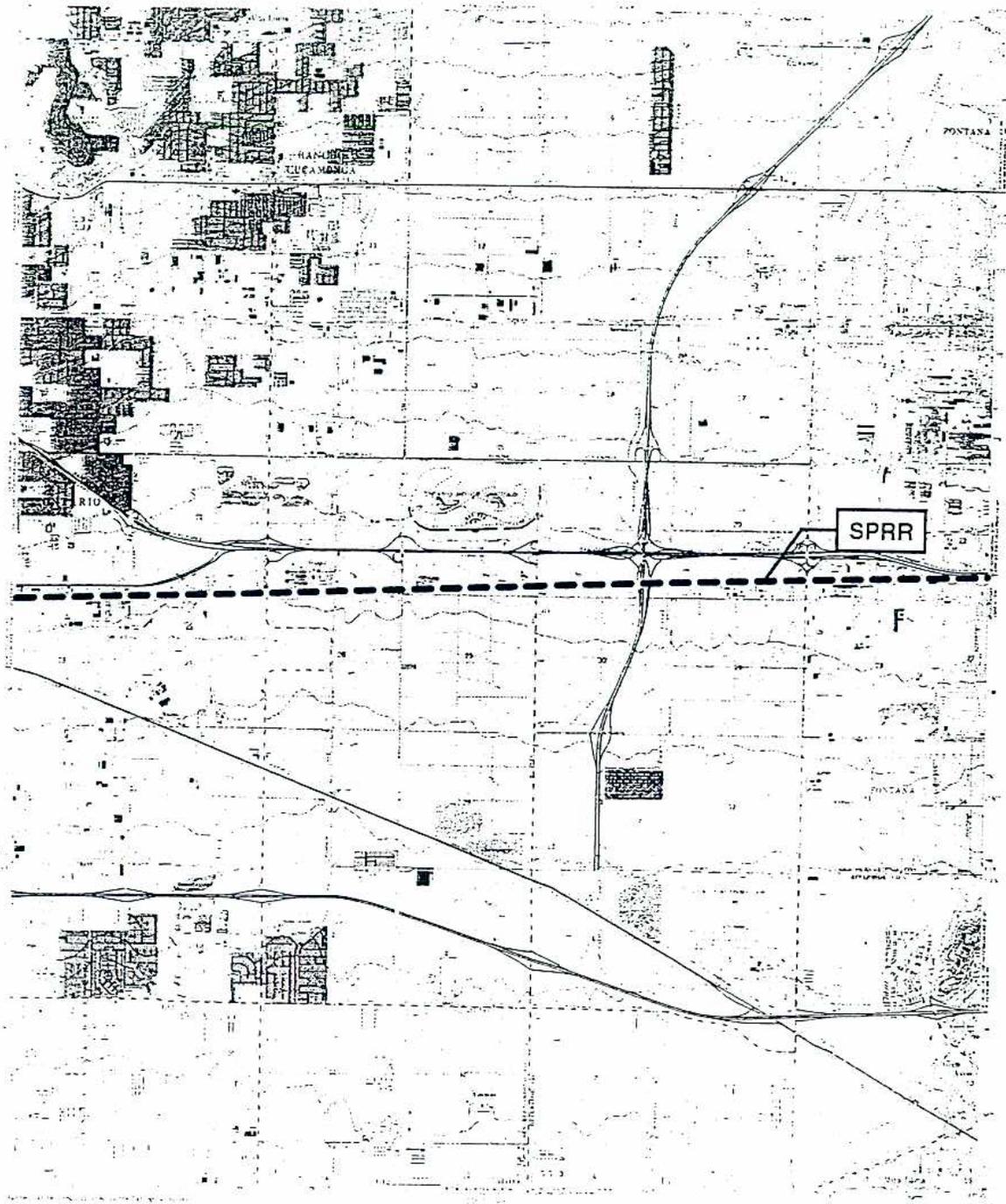


# LOCATION MAP

Page 10 of 12

\*Resource Name or #: C-Los Angeles - A-1; Southern Pacific Railroad

\*Map Name: Guasti, California \*Scale: 1:80,000 (1"=6,666') \*Date of Map: PR 1981



Base map: USGS 7.5'-series Guasti,  
California, quadrangle (1966, PR 1981)



# LOCATION MAP

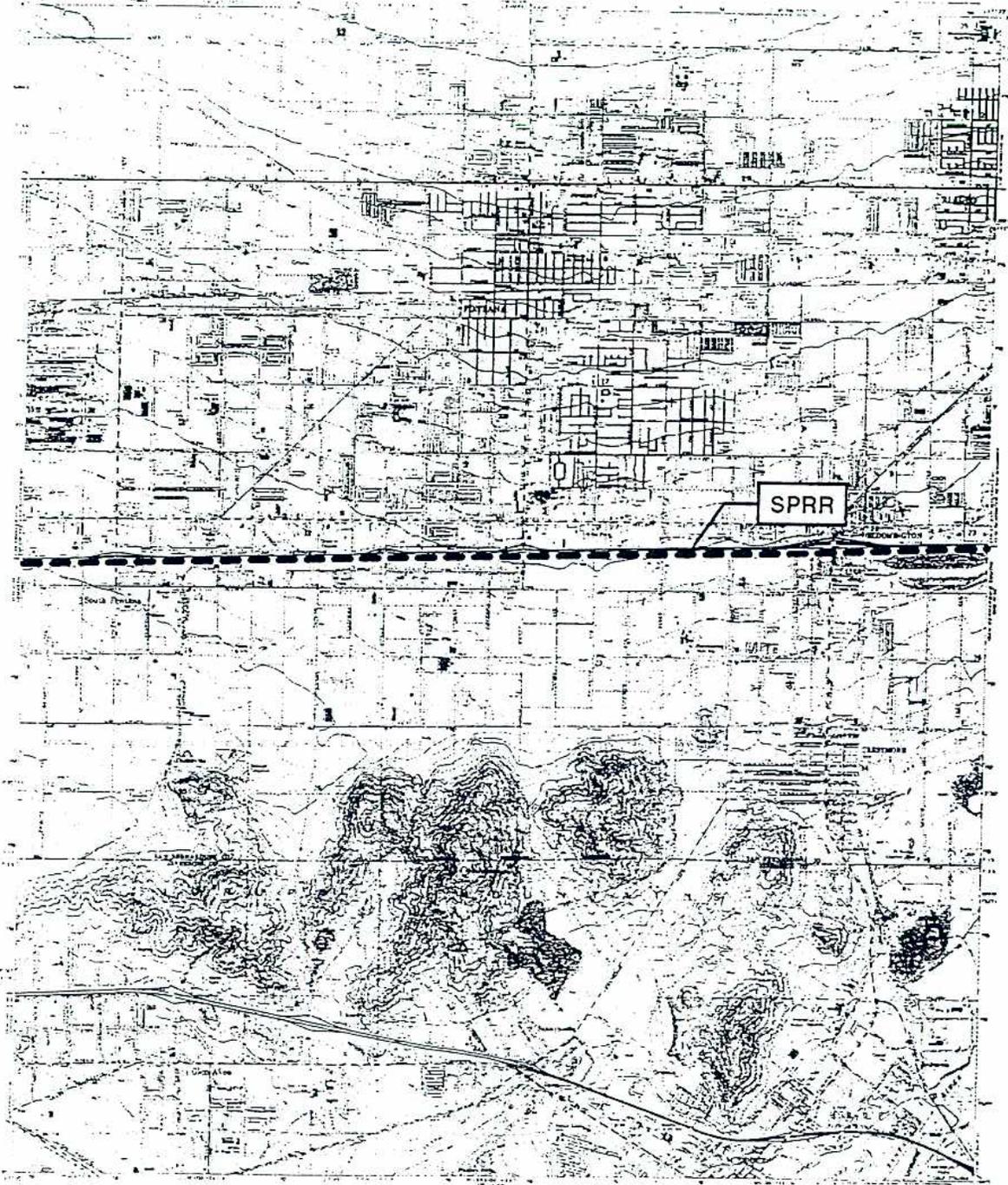
Page 11 of 12

\*Resource Name or #: C-Los Angeles - A-1; Southern Pacific Railroad

\*Map Name: Fontana, California

\*Scale: 1:80,000 (1"=6,666')

\*Date of Map: PR 1980



feet

Scale = 1:80,000

Base map: USGS 7.5-series Fontana,  
California quadrangle (1967, PR 1980)

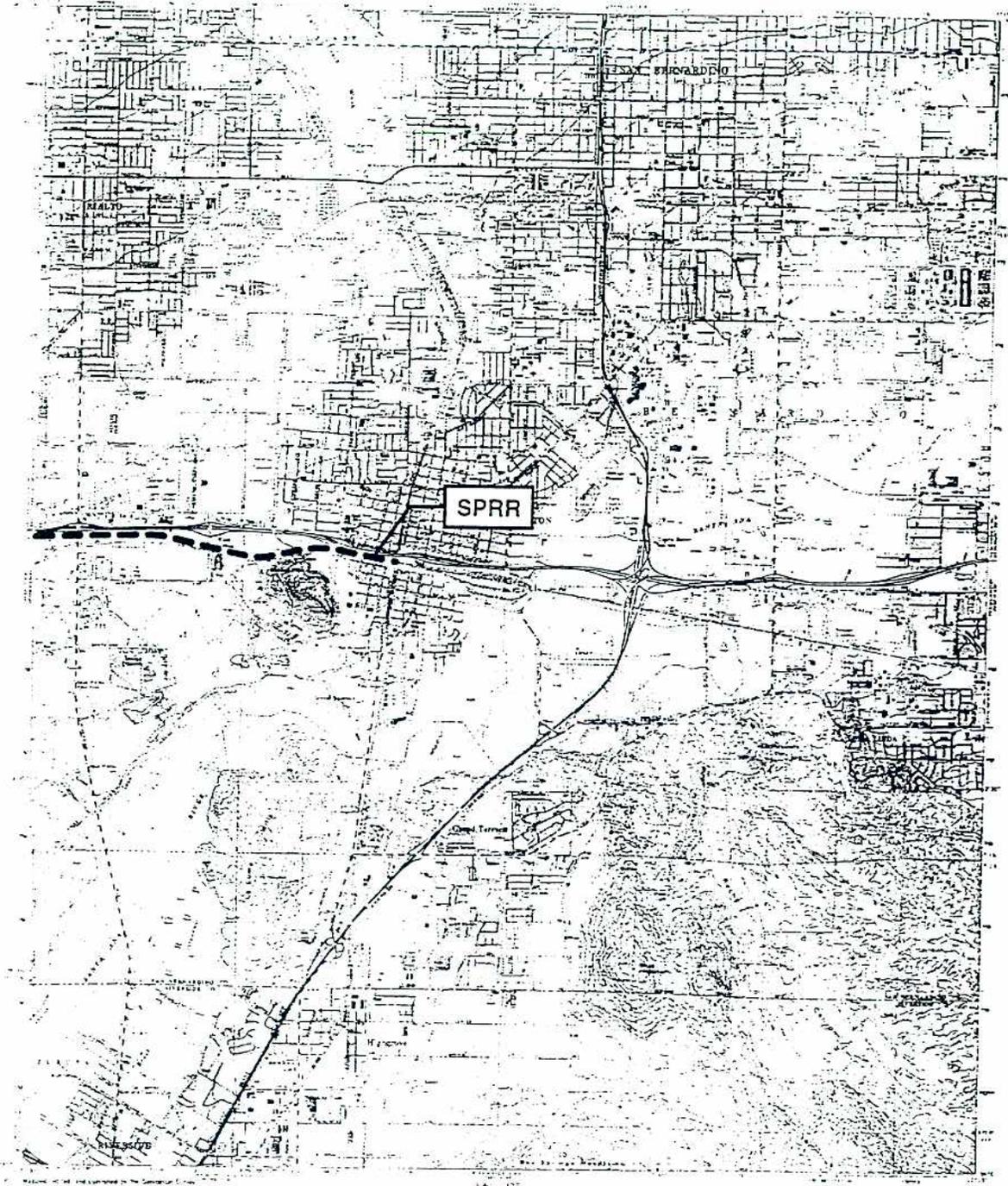


# LOCATION MAP

Page 12 of 12

\*Resource Name or #: C-Los Angeles - A-1: Southern Pacific Railroad

\*Map Name: San Bernardino South, California \*Scale: 1:80,000 (1"=6.666') \*Date of Map: PR 1980



Scale = 1:80,000

Base map: USGS 7.5'-series San Bernardino, California, quadrangle (1967 PR 1990)



State of California — The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

**Primary #**  
**HRI #**  
**Trinomial**  
**NRHP Status Code**

**Other Listings**  
**Review Code**

**Reviewer**

**Date**

\*Resource Name or #: (Assigned by recorder) Walnut Substation

Page 1 of 5

**P1. Other Identifier:**

\*P2. **Location:** \*a. **County** Los Angeles  Not for Publication  Unrestricted

\*b. **USGS 7.5' Quad** Baldwin Park **Date** 1966 (1981)  
T 5S; R 3W; NE ¼ of SE ¼ of Sec 14; S.B.B.M.

c. **Address:** 16333 East Gale **City** City of Industry **Zip**

d. **UTM Zone** 11, 421431 mE/ 3763140 mN

e. **Other Locational Data** (e.g., parcel #, legal description, directions to resource, additional UTM's, etc., when appropriate): From Highway 60, take the Azusa exit, turn east on Gale Street, approximately 2 miles to site.

\*P3a. **Description** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries):

The Walnut Substation is located on the north side of East Gale in City of Industry, California. It is bounded on the north by the Union Pacific Railroad; there is a spur line into the northwest corner of the substation. There are two entrances into the substation, one near the southeast corner and the other at the southwest corner. Lattice steel towers carry the 230-kV transmission lines into the substation. The bus system and transmission towers are steel A-line and monopole construction.

The Walnut Substation is part of the Southern California Edison (SCE) electric power system. Officially named SCE in 1909, the company had gradually expanded its service area to include five counties. It continued to grow and develop multiple sources of power. It contracted for some of the electric power generated by Hoover Dam. Throughout its history it continued to develop innovative and efficient equipment.

\*P3b. **Resource Attributes** (List all attributes and codes): HP 11 Engineering Structure: Substation

\*P4. **Resources Present:**  Building  Structure  Object  Site  District  Element of District  
 Other:

**P5. Photograph or Drawing:** (Photograph required for buildings, structures, and objects.)

\*P6. **Date Constructed/Age and Source:**  Prehistoric  Historic  Both

\*P7. **Owner and Address:** SCE

\*P8. **Recorded by** (Name, affiliation, address): Peggy Beedle, Applied EarthWorks, Inc., 3292 E. Florida Ave., Suite A, Hemet, CA 92544.

**P9. Date Recorded:** April 3, 2006

\*P10. **Type of Survey:**  Intensive  Reconnaissance  Other  
**Describe:**

\*P11. **Report Citation** (Provide full citation or enter "none"): CH2M HILL. 2006. Application for Certification submitted to the California Energy Commission for the Walnut Creek Energy Park (05-AFC-2).

**Attachments:**  None  Location Map  Sketch Map  Continuation Sheet  Building, Structure, and Object Record  Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  Artifact Record  Photograph Record  Other:

Page 2 of 5 \*Resource Name or # (Assigned by recorder)  
\*Recorded by P. Beedle \*Date 3 April 2006  Continuation  Update



Walnut Substation, facing northwest.



Walnut Substation, facing west.

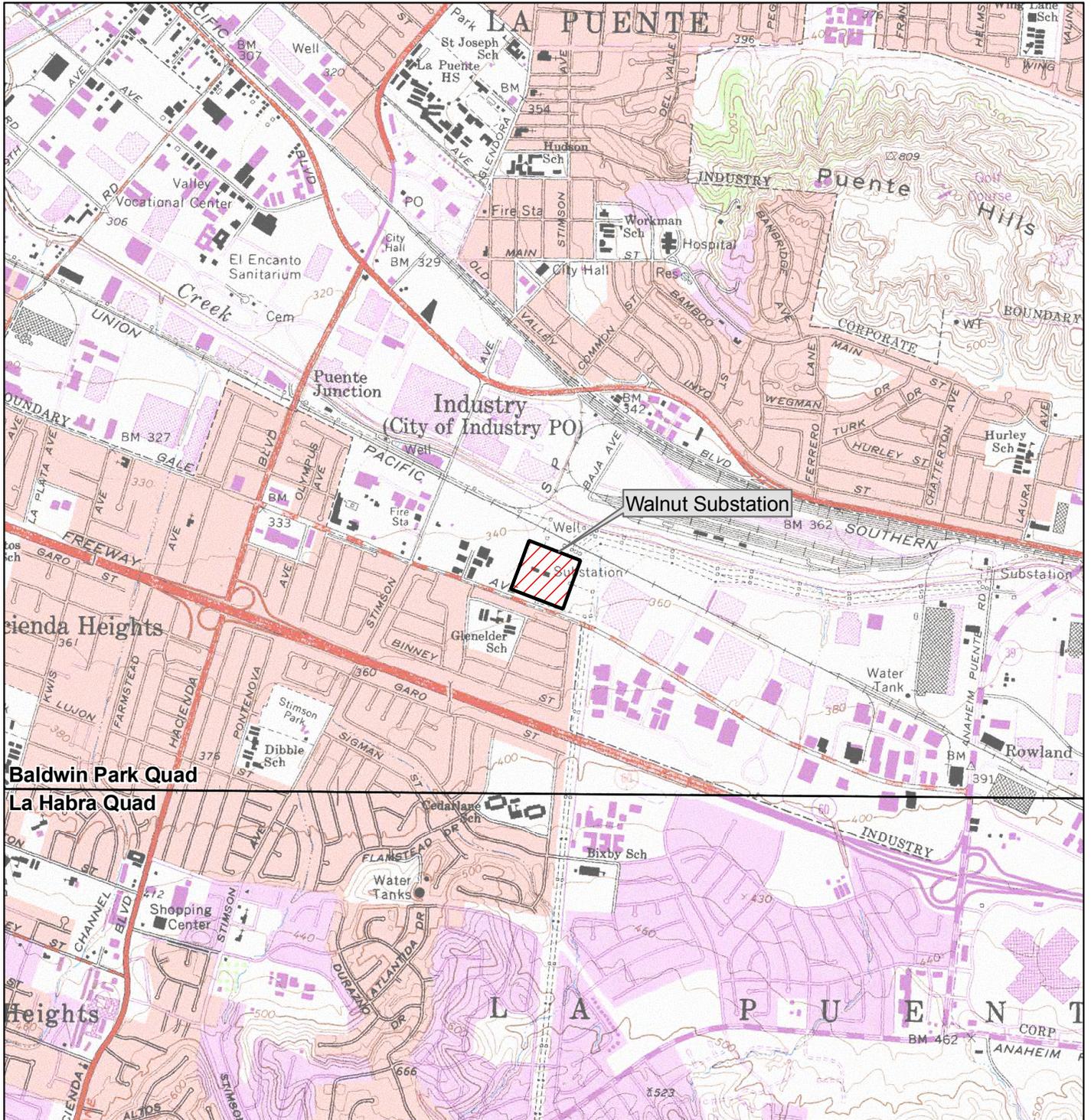
Page 3 of 5 \*Resource Name or # (Assigned by recorder)  
\*Recorded by P. Beedle \*Date 3 April 2006  Continuation  Update



Entrance to Walnut Substation, facing northeast.



Bus structure, facing south.



Baldwin Park Quad

La Habra Quad



**BUILDING, STRUCTURE, AND OBJECT RECORD**

Page 5 of 5

\*Resource Name or # (Assigned by recorder)

**B1. Historic Name:** Walnut Substation

**B2. Common Name:** Walnut Substation

**B3. Original Use:** Substation

**B4. Present Use:** Substation

\***B5. Architectural Style:** N/A

\***B6. Construction History (construction date, alterations, and dates of alterations):** 1957, alterations post 1965??

\***B7. Moved?:**  No  Yes Unknown Date: Original Location:

\***B8. Related Features:** railroad spur, transmission lines

**B9. a. Architect:** Unknown.

**b. Builder:** Southern California Edison

\***B10. Significance:** Theme: Industry

Area: southern California

Period of Significance:

Property Type: Substation

Applicable Criteria:

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

The Walnut Substation is part of the power transmission system of Southern California Edison. It was constructed in 1957, the same year as the incorporation of City of Industry. In the 1950s, the conventional substation design used lattice steel bus systems and transmission line towers. The current A-line bus system and monopole towers appear to be based on a "low silhouette" design instigated by the Bureau of Reclamation in 1965. Private companies copied this design, which was considered more aesthetically pleasing than the traditional lattice steel. Because SCE has not made available any documentation on the substation, this design change can only be surmised. This change would also negatively impact the integrity of the substation, which would then be considered as a non-contributing element of the larger transmission system. Based on visual evidence only, the property is recommended to be not eligible for the National Register of Historic Places or the California Register. If further documentation becomes available, the property should be reassessed.

**B11. Additional Resource Attributes (list attributes and codes):** HP 11 Engineering Structure: Substation

\***B12. References:** <http://www.sce.com/AboutSCE/History/HistoricalTimeline>

**B13. Remarks:**

\***B14. Evaluator:** P. Beedle, Applied EarthWorks, Inc., 3292 E. Florida Ave., Suite A, Hemet, CA 92544.

**Date of Evaluation:** April 3, 2006

This space reserved for official comments.

Sketch Map or Photo



# Attachment CR-4

## Architectural Historian Resume

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### **PEGGY BEEDLE**

#### Expertise

Architectural/landscape history, archival research, historical site inventory and evaluation, cultural landscapes evaluation, preservation planning.

#### Education

M.A. Cultural Resource Management and Landscape History, University of Wisconsin, 1998.

B.A. Anthropology, University of Iowa, 1974.

#### Professional Experience

2004– Architectural/Landscape Historian, Applied EarthWorks, Inc., Hemet, California.

2003–2004 Project Manager/Principal Investigator, Associated Cultural Resource Experts, Littleton, Colorado.

2000–2002 Principal Investigator and Architectural/Landscape Historian, The Louis Berger Group, Inc., Marion, Iowa.

1998–1999 Architectural/Landscape Historian, Michael Baker Jr., Inc., Charleston, West Virginia.

1998 Historian, Wisconsin Barns Preservation Initiative, University of Wisconsin Extension Service, Madison.

1994–1996 Historic Preservation Specialist, Wisconsin Historical Society, Madison.

#### Technical Qualifications

Ms. Beedle has served as an architectural and landscape historian for projects in California and Nevada as well as in other Great Basin, Rocky Mountain, Midwest, and Upland South states. Her experience includes preparation of research designs and preservation plans, completion of field surveys and historical studies, and evaluation of historical properties and cultural landscapes. Ms. Beedle has completed numerous studies of residential, agricultural, and industrial properties as well as transportation systems and other public facilities. She has performed investigations on behalf of private-sector clients, historical societies, and various state and federal government agencies, including the National Park Service and state departments of transportation in Iowa and West Virginia, for whom she performed architectural surveys, architectural evaluations, and assessments of adverse effects on eligible properties. Since joining Applied EarthWorks, she has completed numerous historic resource evaluations, Historic Resource Evaluation Reports for Caltrans, an Historic Structures Report for the Francisco Estudillo Mansion, a National Register Property, and a Cultural Landscape Report for the Santa Margarita Ranch. She has prepared Historic American Engineering Record (HAER) documents, National Register nominations, Historic Structure Reports (HSR) and Cultural Landscape Reports (CLR), and other technical reports of findings for cultural resources projects. .

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# Attachment CR-5

Native American Consultation

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# Gabrieleno Band of Mission Indians

P.O. Box 3021  
Beaumont, CA 92223  
951-845-3606

October 15, 2005

Clint Helton  
CH2M HILL  
3Hutton Centre Drive  
Suite 200  
Santa Ana, CA 92707

RE: Walnut Creek Energy Park

Dear Mr. Helton,

Thank you for your correspondence concerning Native American repatriation. The Gabrieleno Band of Mission Indians are tied to many village sites, encompassing Los Angeles, Orange, Riverside, parts of Ventura and San Bernardino counties. While we have many sacred and cultural sites both documented by Tribal oral history and anthropological documentation, there are many that have not been identified and should remain so. We would however like to be advised and notified when these sites are uncovered.

Due to the sensitivity of the area in question, we would request that Native American monitors be on-site for this project. Our Tribe has members that have been trained in monitoring Native American sites and are available for consultation should it be required or requested.

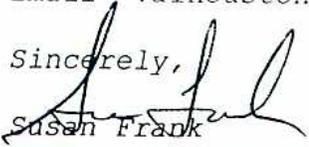
We would like to see any remains and artifacts that have to be removed from a site be returned to the proper tribe due to the documented fact that many bands were kept at San Gabriel Mission that encompassed the areas mentioned above we feel we should have input.

An optimum scenario would be not to remove the artifacts but to repatriate them with any funerary objects in tact. We would also request that the appropriate tribe be contacted so the remains can be repatriated by the tribe who's decadency of village site pertains to.

We thank you for your time and consideration of our request and acknowledgement of our letter. If we can be of any further help or service please fell free to contact us.

There is an address correction. P.O. Box 3021 Beaumont CA 92223 and Email [vainoustoneverizon.net](mailto:vainoustoneverizon.net). 951-897-2536 or 951-845-3606

Sincerely,

  
Susan Frank  
Tribal Chairwoman

**WALNUT CREEK ENERGY PARK  
CONSULTATION LETTERS TO NATIVE AMERICAN CONTACTS PROVIDED BY NAHC**

RECIPIENT	DATE SENT	LETTER MAILED	FAXED	E-MAILED	COMMENTS RECEIVED (FROM LETTER)	FOLLOW UP PHONE CALLS	COMMENTS SUMMARY (FROM PHONE)
Samuel H. Dunlap P.O. Box 1391 Temecula, CA 92593 (909)693-9351 (cell) (909)693-9196 (fax)	9/19/05	X			No response received	3/27/06 4:35 pm Left message on voicemail.	No response received
Craig Torres 713 E. Bishop Santa Ana, CA 92701 (714)542-6678	9/19/05	X			No response received	3/27/06 4:36 pm Phone disconnected.	No response received
LA City/County Native American Indian Commission Ron Andrade, Director 3175 West 6th Street, RM. 403 Los Angeles, CA 90020 (213)351-5324 (213)386-3995 (fax)	9/19/05	X	X		No response received	3/27/06 4:36 pm Left message on voicemail.	No response received
Coastal Gabrielino Diegueno Jim Velasquez 5776 42nd Street Riverside, CA 92509 (909)784-6660	9/19/05	X			No response received	3/27/06 4:37 No answer.  5:00 pm No answer.	No response received
Ti'At Society Cindi Alvitre 6602 Zelzah Avenue Reseda, CA 91335 (714)504-2468	9/19/05	X			No response received	3/27/06 4:38 pm Left message on voicemail.	

**WALNUT CREEK ENERGY PARK  
CONSULTATION LETTERS TO NATIVE AMERICAN CONTACTS PROVIDED BY NAHC**

RECIPIENT	DATE SENT	LETTER MAILED	FAXED	E-MAILED	COMMENTS RECEIVED (FROM LETTER)	FOLLOW UP PHONE CALLS	COMMENTS SUMMARY (FROM PHONE)
Gabrielino/Tongva Council/Gabrielino Tongva Nation Sam Dunlap, Tribal Secretary 501 Santa Monica Blvd., Suite 500 Santa Monica, CA 90401 (310)587-2203 (310)587-2281 (fax)	9/19/05	X	X		No response received	3/27/06 4:43 pm Message left with secretary.	No response received
Tongva Ancestral Territorial Tribal Nation John Tommy Rosas, Tribal Administrator 4712 Admiralty Way, Suite 172 Marina Del Ray, CA 90202 (310)570-6567	9/19/05	X			No response received	3/27/06 4:45 pm Spoke to John Tommy Rosas  Email sent 3/28/06.	Requested letter to be resent via email: <a href="mailto:tattnlaw@gmail.com">tattnlaw@gmail.com</a>
Gabrielino Band Mission Indians of CA Ms. Susan Frank P.O. Box 3021 Beaumont, CA 92223 (951)845-3606 (phone/fax)	9/19/05	X	X		Voice message received 10/6/05 from Susan Frank: "We have monitors in our tribe that have been trained. We would like to request that one those [Native American] monitors be present when you start on your site." Tel. 951-845-3606 or 951-768-2662  Letter Received from Susan Frank 10/15/05: Requests	3/27/06 4:49 pm Left message on voicemail.  Rec'd return call from Valquerie Houston Tel. (951)897-2536  3/27/06 4:36 pm Left message on voicemail.  3/28/06 Received voicemail 2:06 pm.  2:11 pm No answer.  2:43 pm	Requests Native American monitor to be on site during construction. "Please keep informed."

**WALNUT CREEK ENERGY PARK  
CONSULTATION LETTERS TO NATIVE AMERICAN CONTACTS PROVIDED BY NAHC**

RECIPIENT	DATE SENT	LETTER MAILED	FAXED	E-MAILED	COMMENTS RECEIVED (FROM LETTER)	FOLLOW UP PHONE CALLS	COMMENTS SUMMARY (FROM PHONE)
					Native American monitors on site during construction.	No answer. 2:57 pm Rec'd call.	
Gabrielino/Tongva Tribal Council Anthony Morales, Chairperson P.O. Box 693 San Gabriel, CA 91778 (626)286-1632 (626)286-1262 (fax) (626)286-1758 (home)	9/19/05	X	X		Phone call received on 10/4/05: Anthony Morales says there are no concerns.	3/27/06 4:43 pm Left message on voicemail. 3/28/06 Rec'd voicemail at 10:04 am. 11:13 am Spoke to Anthony Morales	"If archaeologist on site, request for NA monitor to be also present.
Gabrielino Tongva Indians of California Tribal Council Robert Dorame, Tribal Chair/Cultural Resources 5450 Slauson Ave., Suite 151 PMB Culver City, CA 90230 (562)761-6417 (voice) (562)920-9449 (fax)	9/19/05	X	X	X	No response received	3/27/06 4:50 pm Spoke to Robert Dorame	"If cultural resources have been encountered, historic and prehistoric, please contact us."
Gabrielino Tongva Indians of California Tribal Council Mercedes Dorame, Tribal Administrator 20990 Las Flores Mesa Drive Malibu, CA 90202 <a href="mailto:Pluto05@hotmail.com">Pluto05@hotmail.com</a>	9/19/05	X			No response received	3/27/06 5:15 pm Spoke to Mercedes Dorame. Requested letter to be resent via email: <a href="mailto:pluto05@hotmail.com">pluto05@hotmail.com</a> Email sent 3/28/06	No response received

# Attachment CR-6

Local Historical Society Consultation

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**WALNUT CREEK ENERGY PARK  
PHONE CALL TO LOCAL HISTORICAL SOCIETIES**

<b>HISTORICAL SOCIETIES</b>	<b>DATE &amp; TIME</b>	<b>COMMENTS SMMARY</b>
<b>Los Angeles City Historical Society</b> P.O. Box 41046 Los Angeles, CA 90041 (213) 936-2912 <a href="http://www.lacityhistory.org/">http://www.lacityhistory.org/</a>	3/28/06 11:40 A.M. Left message on voicemail.	No comments received to date
<b>La Puente Valley Historical Society</b> 16021 E. Gale Avenue City of Industry, CA 91745 (626) 336-7644	3/28/06 11:44 A.M. Left message on voicemail.	No comments received to date

# Socioeconomics (61-63)

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## Economic Estimates

61. *To the extent possible, please indicate the year for all economic estimates (i.e., project capital costs, economic impact analysis results using the Impact Analysis for Planning (IMPLAN) input-output model, estimates of total and locally purchased materials and supplies during construction, operations payroll, and operations and annual maintenance budget).*

**Response:** The year used in all of the economic estimates is 2005.

## Property Tax Distribution

62. *Please clarify and provide a quantitative estimate of the distribution of the property taxes among governmental units (i.e., the City of Industry and Los Angeles County) for the WCEP.*

**Response:** The project site is owned by the City of Industry Redevelopment Agency and as such, it is exempt from taxes. WCE will lease the property.

## Records of Conversation

63. *Please provide copies of records of conversation that are part of Appendix 8.10B as stated on page 8.10-21 in the AFC.*

**Response:** See Attachment SOC-1.

# Attachment SOC-1

## Records of Conversation

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# CH2MHILL TELEPHONE CONVERSATION RECORD

**Call To:** Robbie Maxville  
Admin. Asst., Chief Business Officer  
Hacienda La Puente Unified School District

15959 E. Gale Avenue  
City of Industry

**Phone No.:** (626) 933-3820      **Date:** October 5, 2005

**Call From:** Fatuma Yusuf      **Time:** 09:27 AM

**Message**

**Taken By:** Fatuma Yusuf

**Subject:** School impact fees

I called to ask if the Hacienda La Puente Unified School District would charge school impact fees on the Walnut Creek Energy Park project. Robbie Maxville confirmed that the project would be located within the Hacienda La Puente School District, which does not assess school impact fees on any development.

# CH2MHILL TELEPHONE CONVERSATION RECORD

**Call To:** Sal Malleda  
LA County Fire Dept  
Emergency Response Unit

**Phone No.:** 323-890-4317  
**Date:** September 23, 2005

**Call From:** Jane Koewing  
**Time:** 9:30 AM

**Message Taken By:** Jane Koewing

**Subject:** Emergency Response time

I spoke to Sal Malleda of the Emergency Response Unit 323-890-4317. They have 3 teams throughout LA County. Industry would be handled by the East Team. There is also a West Team and a backup team. Each team has 2 vehicles and one person per vehicle. After hours they participate in the 911 fire dispatch system. They estimate response time from Commerce, California (address above) to Industry should be about 20 minutes depending on traffic.

He indicated that they served all of LA County except for a few cities such as Vernon, Long beach, Segundo, and Glendale that have their own units.

October 5, 2005, received call back from Inspector Eric Bold regarding my call to him the previous week. I informed him that I had already received the information I needed from Sal Malleda. Inspector Bold confirmed this information.

# CH2MHILL TELEPHONE CONVERSATION RECORD

**Call To:** Captain Arzaga  
Fire Station 118  
17056 Gale Avenue  
City of Industry

Los Angeles County Fire Dept  
City of Industry, CA

**Phone No.:** (626) 854-3488

**Date:** September 20, 2005

**Call From:** Matt Franck

**Time:** 9:20 AM

**Message**

**Taken By:** Matt Franck

**Subject:** Response time

Fire protection services for the project area are provided by the Los Angeles County Fire Department, with three fire stations located in the City of Industry. Station 118 serves the project site. Response time for emergency calls is approximately 2 minutes.

# CH2MHILL TELEPHONE CONVERSATION RECORD

**Call To:** Deputy McGrattan  
Los Angeles County  
Sheriff's Dept. 150 North Hudson Ave.  
Industry, CA

**Phone No.:** (626) 330-3322

**Date:** September 20, 2005

**Call From:** Matt Franck

**Time:** 09:55 AM

## Message

**Taken By:** Matt Franck

**Subject:** Response time

Police services for the project area are provided by the Los Angeles County Sheriff's Department, which maintains a police station in the City of Industry. Response times for emergency calls are typically less than 5 minutes. Response times for non-emergency calls typically range from 5 to 30 minutes.

# CH2MHILL TELEPHONE CONVERSATION RECORD

**Call To:** Victoria Gallo  
Chief Financial Officer  
City of Industry  
**Phone No.:** 626-333-2211  
**Date:** March 24, 2006  
**Call From:** Fatuma Yusuf  
**Time:** 2:20 PM

**Message**

**Taken By:** Fatuma Yusuf  
**Subject:** Property tax allocation

I called Victoria Gallo to ask about the allocation/distribution of property tax collected by the city. She told me that in order for her to tell me what the property tax distribution was, she would need the parcel number for the property in question. I told her the parcel for the proposed WCEP project site was located at 911 Bixby Dr. She informed me that according to the records, the parcel is owned by the redevelopment agency and as such is exempt from property taxes.

# Soil and Water Resources (64-74)

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## Wastewater Chemistry

64. Please provide a new table in which WCEP's estimated wastewater chemistry is described, including known pollutants originating both in the source water and on-site. A list of known industrial pollutants which LACSD may limit in addition to those found in Table 8.15-4 can be found in Section 2.2 of their "Information and Instructions for Obtaining an Industrial Wastewater Discharge Permit." If the water quality of the effluent is estimated to match that of the source water, explain why this is true.

**Response:** Table 8.15-4 in the AFC mistakenly included source water quality rather than effluent water quality. Table 8.15-4 as revised below (Table DR64-1) correctly includes the modeled effluent water quality. It should be noted that the AFC references both six cycles of concentration (for normal operation) and 8.1 cycles of concentration (worst case). For the analysis of wastewater quality, the appropriate assumption is 6 cycles of concentration (i.e., normal operation). As presented below, WCEP wastewater discharges are expected to meet all LACSD numeric requirements. Note that in many cases LACSD data is presented with measured concentrations as "less than" a certain value. In these cases, the final value (the effluent quality value multiplied by the cycles of concentration) would be "less than" the stated value.

- LACSD reports effluent levels of total identifiable chlorinated hydrocarbons (TICH) at "less than 0.009 µg/L, or 0.000009 mg/L." If the pollutant was present at levels less than 0.009 µg/L, with six cycles of concentration WCEP effluent would meet the LACSD standard of "essentially none."
- Sulfide concentrations are likely to be at or near 0 mg/L. Sulfide is stripped from the wastewater stream by chlorination, and chlorination will occur at both the San Jose Creek WRP and at the WCEP.
- Effluent temperature is expected to be slightly higher than the influent temperature of 79°F. This is a result of the water's use in the cooling process. Although water temperature has not been modeled, effluent temperature is expected to be significantly below the LACSD limit of 140°F.
- No solvents or other flammable/explosive chemicals will be added to the wastewater stream at the WCEP and these chemicals have not been detected in water recycled from the San Jose Creek WRP. The flash point of the WCEP effluent is expected to be significantly above the LACSD limit of 140°F.

TABLE DR64-1

Comparison of WCEP Wastewater (at 6 Cycles of Concentration) and LACSD Discharge Standards

Constituent	Wastewater (mg/L)	LACSD Allowable Concentrations (mg/L)
Cyanide (total)	0.06	10
Arsenic	0.0054	3
Cadmium	0.0018	15
Chromium	0.06	10
Copper	0.036	15
Lead	0.006	40
Mercury	0.00018	2
Nickel	0.108	12
Silver	0.0012	0.005
Zinc	0.48	25
TICH*	0.000009	Essentially None
pH (pH units)	7.6	> 6.0
Dissolved sulfide	--	0.1
Temperature (°F)	< 114	< 140
Flash Point (°F)	> 140	> 140

## Notes:

\* TICH = Total Identifiable Chlorinated Hydrocarbons, which include such pesticides as aldrin, dieldrin, chlordane, DDT, endrin, hexachlorocyclohexane, toxaphene, and PCBs.

Source: LACSD, 2005a.

Onsite chemical use is planned, but specific chemicals have not been considered at this time. Typically, this is part of the detailed design phase of the project. Any chemicals used at the WCEP that may be introduced into the wastewater stream will contain no priority pollutants and will conform to all applicable environmental requirements.

## San Gabriel Watershed

65. *Please provide an analysis of the possibility that WCEP sanitary or industrial wastewater could contribute to the high ammonia levels in the 303(d) impaired water bodies of the San Gabriel River watershed. This may include a schedule for the improvements at local treatment facilities expected to "significantly lower ammonia concentrations," as described in AFC Supplement section 8.15.*

**Response:** The ammonia concentrations of WCEP discharges to the sanitary sewer are expected to be approximately 9.6 mg/L. This is significantly higher than the level of ammonia that is known to be toxic to aquatic life (typically greater than 1 mg/L). However, the treatment process at the San Jose Creek WRP has been designed to reduce ammonia concentrations to meet discharge standards, including a recently constructed nitrification/denitrification (NDN) facility. The new facilities are fully online, but additional studies are underway. The influent ammonia loading from the WCEP will be effectively controlled by the new process.

## San Jose Creek Water Quality Parameters

66. Please provide a physical and chemical analysis of San Jose Creek adjacent to the WCEP site for baseline purposes. This may be U.S. Geological Survey sample data, a U.S. Army Corps of Engineers study, or an analysis of basic water quality parameters such as those found in the "General Parameters" section of AFC Table 7.2-1.

**Response:** The physical and chemical characteristics of San Jose Creek approximately 4.5 miles downstream of the WCEP site are presented in Table DR66-1. Data was collected by LACSD from 1987 through 1995, and includes results from both dry weather and storm conditions (LACSD, 2006).

TABLE DR66-1  
Summary of Average Water Quality Characteristics of San Jose Creek at Workman Mill Road, Grab Samples 1987-1995

Water Quality Parameter	Dry Weather Monitoring (mg/l)	Storm Monitoring (mg/l)	Combined (mg/l)
General Parameters	-	-	-
Alkalinity	-	-	181.91
Hardness	-	-	361.54
pH	-	-	7.93
Total Dissolved Solids	-	-	697.35
Specific Conductance (µmhos/cm)	-	-	1,034.5
Chemical Parameters	-	-	-
Arsenic – D	0.33	-	-
Arsenic – T	-	-	-
Boron – D	262.56	-	-
Boron – T	-	86.60	-
Cadmium – D	0.67	-	-
Cadmium – T	-	0.40	-
Calcium	-	-	89.15
Chloride	-	-	104.30
Chromium – D	-	1.30	-
Chromium – T	3.25	-	-
Copper – D	7.26	-	-
Copper – T	-	32.67	-
Fluoride	-	-	0.37
Iron – D	1,109.07	-	-
Iron – T	-	1,913.20	-
Lead – D	7.31	-	-
Lead – T	-	44.96	-
Magnesium	-	-	34.64

TABLE DR66-1

Summary of Average Water Quality Characteristics of San Jose Creek at Workman Mill Road, Grab Samples 1987-1995

Water Quality Parameter	Dry Weather Monitoring (mg/l)	Storm Monitoring (mg/l)	Combined (mg/l)
Manganese – D	24.21	-	-
Manganese – T	-	84.24	-
Mercury – D	0	-	-
Mercury – T	-	012	-
Nickel – D	2.52	-	-
Nickel – T	-	14.62	-
Potassium	-	-	6.87
Silver – D	0	-	-
Silver – T	-	0	-
Sodium	-	-	83.85
Sulfate	-	-	226.44
Zinc – D	23.65	-	-
Zinc – T	-	135.92	-

D = Dissolved

T = Total

Source: LACSD, 2006

## Reclaimed Water Storage

67. Please provide a description of RWD's reclaimed water storage facilities and an estimate of the number of days WCEP could operate on stored capacity alone.

**Response:** WCE has met with Rowland Water District and has requested assistance in order to provide the information sought by this data request. WCE will continue to work with Rowland Water District and when WCE receives this data WCE will file a supplemental response.

## Reclaimed Water Outages

68. Please provide a list of all outages or shortages in reclaimed water supply experienced by RWD and/or the San Jose Creek Wastewater Reclamation Plant in the last 5 years.

**Response:** WCE has met with Rowland Water District and has requested assistance in order to provide the information sought by this data request. WCE will continue to work with Rowland Water District and when WCE receives this data WCE will file a supplemental response

## Agreement with RWD

69. Please provide, if possible, any terms in a proposed agreement/contract with RWD which guarantee reliability of the reclaimed water supply to WCEP.

**Response:** WCE and Rowland Water District are currently negotiating the terms of the water supply agreement, so the terms of that agreement are not yet final. However, because

it is inconsistent with the terms contained in water supply agreements, WCE believes it is unlikely that Rowland Water District will “guarantee reliability” of the reclaimed water supply. It is more likely that Rowland Water District will use good engineering practices and maintain sufficient facilities to provide a reliable supply.

## Backup Supply

70. *Please identify a preferred backup water supply sufficient for a worst-case 45 day disruption of reclaimed water supply during construction, commissioning, or operations of WCEP. Describe the potential impacts on other users of the backup source if it was used operationally for a 45-day period in the summer (during peak demand of both power and water).*

**Response:** WCE has not identified a separate stand-alone backup supply for the WCEP. WCE will rely on Rowland Water District’s reclaimed water supply system, which includes various redundancies and/or supply alternatives for providing reliable source of reclaimed water. WCE has met with Rowland Water District and has requested assistance in order to provide the information sought by this data request. WCE will continue to work with Rowland Water District and when WCE receives this data WCE will file a supplemental response.

## Future Negotiations

71. *Please provide, if possible, a schedule for future negotiations between the City of Industry and the interested parties of RWD, Walnut Valley Water District, and Suburban Water Systems.*

**Response:** We are not aware of any schedule for future negotiations between the City of Industry and RWD, Walnut Valley Water District and Suburban Water Systems,

## Will-Serve Letter

72. *Please provide a detailed will-serve letter from RWD specifying whether reclaimed water will be available for WCEP as soon as 2007.*

**Response:** WCE has requested a will-serve letter from RWD. Once received, it will be provided in a supplemental response.

## Depth of Excavation

73. *Please provide information on the possible excavation depths to be reached during WCEP construction. Indicate which types of foundations would require the deepest and shallowest depths to be excavated.*

**Response:** A site-specific geotechnical study has been performed that indicates groundwater depths between 23 and 27 feet below the surface. The report (Attachment 1 to AFC Appendix 10G) includes a recommendation that at least 12 inches of existing soil over the entire site be removed for the purpose of observing the underlying fill. It is also recommended that any undocumented fill be removed and replaced with properly compacted fill. Fill was encountered in the exploratory borings to depths of 4 and 6.5 feet. Maximum excavation depths are expected to be no greater than 4 feet for foundations and 6 to 8 feet for the underground cooling water piping. The shallowest excavations will be the 12 inches as required above for fill observation.

## Draft Drainage, Erosion, and Sedimentation Control Plan

74. *Please provide a draft construction DESCOP outlining site management activities to be implemented during site mobilization, excavation, and construction.*

**Response:** The draft construction Drainage, Erosion, and Sediment Control Plan is attached as Attachment S&W-1.

## References

LACSD. 2006. Data provided by Fred Gonzales, Civil Engineer, Monitoring Unit, Water Quality Section, Watershed Management Division, Los Angeles County Department of Public Works via e-mail to Heather Waldrop, CH2M HILL, March 13, 2006.

Sanitation Districts of Los Angeles County (LACSD). 2005. *San Jose Creek Water Reclamation Plant East Final Effluent Quality*, FY 2003-04.

# Attachment S&W-1

Draft Drainage, Erosion, and Sediment Control Plan

Via separate file.

# Traffic and Transportation (75-76)

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## South Azusa Avenue to East Chestnut Street Route

75. *Please explain why the South Azusa Avenue to East Chestnut Street route was not analyzed.*

**Response:** The South Azusa Avenue to East Chestnut Street route was not analyzed because the proposed route (South Azusa Avenue to East Gale Avenue to South Bixby Drive) would be the most practical route for construction and operation traffic. Although the route chosen would require a left-hand turn into the project site (across traffic), this left-hand turn would take place where South Bixby Drive turns east, becoming East Chestnut Street and at a location where there is no intersection or cross street and relatively low traffic volume. This is a relatively simple crossing, and a safe location where the on-coming traffic would be easily visible on East Chestnut Street. Outbound traffic using the suggested alternative routing of East Chestnut Street to South Azusa Avenue would, of course, require this same traffic crossing (See Figure DR75-1).

The South Azusa Avenue to East Chestnut Street route, in addition, would have several drawbacks:

1. For inbound travelers, this alternative route would require a left turn at the signalized intersection of South Azusa Avenue and Anaheim Puente Road (connector to East Chestnut Street). Because traffic volume on this route is light, the existing signal cycles would likely be too short to accommodate construction traffic. This could result in long delays and left turn lane queues encroaching into main travel lanes. In contrast, left turns from South Azusa Avenue to East Gale Avenue could be made from double turn-lanes with relatively long signal cycles. This route would also require left-turns from Anaheim Puente Road onto East Chestnut Street, an unsignalized four-way intersection.
2. For outbound travelers, this alternative route would require a short-distance merge from Anaheim Puente Road onto South Azusa Avenue. Given that southbound traffic on South Azusa Avenue travels at approximately 45 miles per hour, this merge is potentially dangerous, especially for slow moving trucks.

## Levels of Service and Vehicle Delay

76. *Please analyze this potential route and provide the Levels of Service and Vehicle Delay (Existing and Peak Construction Conditions) for the following intersections:*

- a. *South Azusa Avenue and East Railroad Street;*
- b. *South Azusa Avenue and Anaheim Puente Road; and*
- c. *Anaheim Puente Road and East Chestnut Street.*

*In discussing and analyzing this route and other potential routes, please work with the city and county traffic engineers to identify their preferences.*

## Route Descriptions

The project site is located at the corner of East Chestnut Street and South Bixby Drive, where East Chestnut Street turns south and becomes South Bixby Drive. Northbound traffic accesses the project site via South Bixby Drive, while westbound traffic accesses the project site via East Chestnut Street. The three most direct routes (inbound) connecting the SR-60/South Azusa Avenue interchange and the project site are (1) South Azusa Avenue to East Gale Avenue to South Bixby Drive to the project site (as proposed in the AFC), (2) South Azusa Avenue to Anaheim Puente Road to East Chestnut Street to the project site, and (3) South Azusa Avenue to Virgil Waters Way to East Chestnut Street to the project site (Figure DR75-1).

**Route 1:** Travel north from SR-60 on South Azusa Avenue; turn west on East Gale Avenue; and turn north on South Bixby Drive to the project site.

Inbound traffic on this route makes a left turn at the South Azusa Avenue/East Gale Avenue intersection to East Gale Avenue, a right turn at the East Gale Avenue/South Bixby Drive intersection to South Bixby Drive, and then turns left into the project site.

Outbound traffic on this route makes a right turn onto South Bixby Drive, a left turn at the East Gale Avenue/South Bixby Drive intersection to East Gale Avenue, and a right turn at the South Azusa Avenue/East Gale Avenue intersection to South Azusa Avenue.

The South Azusa Avenue/East Gale Avenue and East Gale Avenue/South Bixby Drive intersections are signalized.

**Route 2:** Travel north from SR-60 on South Azusa Avenue; continue north (after turning) on Anaheim Puente Road; and turn west on East Chestnut Street to the project site.

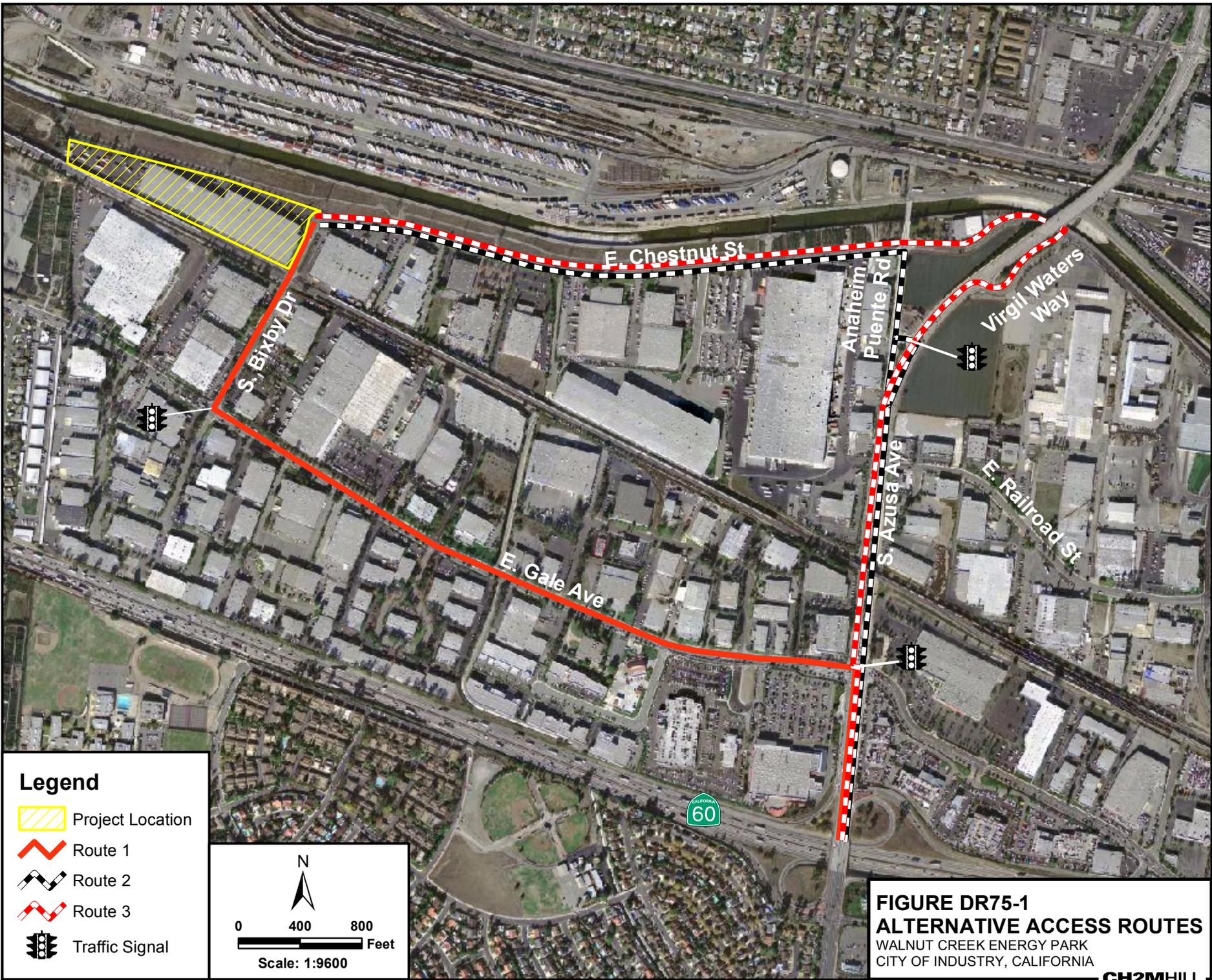
Inbound traffic on this route makes a left turn at the South Azusa Avenue/Anaheim Puente Road intersection onto Anaheim Puente, a left turn at the Anaheim Puente Road/East Chestnut Street intersection onto East Chestnut Street, and right turn into the project site.

Outbound traffic on this route makes a left turn from the project site to East Chestnut Street, a right turn at the Anaheim Puente Road/East Chestnut Street intersection to Anaheim Puente, and then merges southbound onto South Azusa Avenue.

The South Azusa Avenue/Anaheim Puente intersection is signalized for northbound traffic, but southbound (in this case outbound) traffic from Anaheim Puente Road merges onto South Azusa Avenue. The Anaheim Puente/East Chestnut Street intersection is a four-way stop sign-controlled intersection.

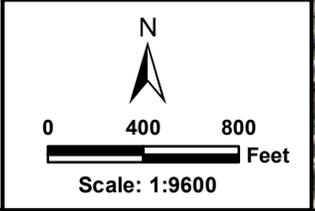
**Route 3:** Travel north on South Azusa Avenue; northeast onto Virgil Waters Way; and west on East Chestnut Street to the project site.

Inbound traffic on this route makes a right turn merge at the South Azusa Avenue/Virgil Waters Way intersection onto Virgil Waters, a left turn at the Virgil Waters Way/East Chestnut Street intersection to East Chestnut Street, and a right turn into project site.



**Legend**

-  Project Location
-  Route 1
-  Route 2
-  Route 3
-  Traffic Signal



**FIGURE DR75-1**  
**ALTERNATIVE ACCESS ROUTES**  
 WALNUT CREEK ENERGY PARK  
 CITY OF INDUSTRY, CALIFORNIA  
**CH2MHILL**

File Path: Glacier\SACGIS\Chestnut\_CCEP\sourcedata\mxds\Alternative\_Routes.mxd, Date: March 29, 2006,

Outbound traffic on this route makes a left turn from the project site to East Chestnut Street, and a right turn at the Virgil Waters Way/East Chestnut Street intersection. Traffic at this point must turn right (northbound) onto South Azusa Avenue, however, because there is no left turn option for a direct return to SR-60. Outbound traffic on this route could also use Anaheim Puente Road (as with Route 2).

The South Azusa Avenue/Virgil Waters Way intersection is controlled by a stop sign at Virgil Waters Way. The Virgil Waters Way/East Chestnut Street intersection is a three-way stop sign-controlled intersection.

## Route Analysis

Characteristics of the roadways described above are summarized in Table DR76-1. All roadways have sufficient capacity to accommodate additional traffic. This is especially true for two-lane roads such as East Chestnut Street, Anaheim Puente Road and Virgil Waters Way.

TABLE DR76-1  
Characteristics of Roadways in Project Study Area

Name	Classification	Hourly Design Capacity <sup>a</sup>	Average Daily Traffic Volume <sup>b, c</sup>	Peak Hour Volume <sup>b</sup>
<b>Local Roadways:</b>				
South Azusa Avenue	Arterial	5,100	55,600	3,750
East Railroad Street	Collector Road	5,100	44,700	2,980
East Chestnut Street	Local Road	1,700	3,260	169
Anaheim Puente Road	Local Road	1,700	NA	NA
Virgil Waters Way	Local Road	1,700	NA	NA

Notes:

<sup>a</sup> Vehicles/hour (both directions). Source: Highway Capacity Manual, Transportation Research Board (TRB), 2000

<sup>b</sup> Source: Los Angeles County Department of Public Works, Traffic Volumes

<sup>c</sup> Source: City of Industry, Planning Department

NA = Not available

Table DR76-2 summarizes LOSs and related delays for existing (2005) conditions and construction phase (2008) conditions for Route 2 and Route 3. This analysis focuses on the following study area intersections during a typical weekday evening peak 4:00 P.M. to 6:00 P.M.

- South Azusa Avenue and East Railroad Street
- South Azusa Avenue and Anaheim Puente Road
- Anaheim Puente Road and East Chestnut Street

All three intersections currently operate at LOS A or LOS B. Peak construction traffic would not have a significant adverse impact on any of the intersections. The lowest LOS during the peak construction would be LOS B.

TABLE DR76-2

Level of Service Summary for Existing and Peak Construction Conditions

Intersection	Existing		Peak Construction Route 2			Peak Construction Route 3		
	LOS	Delay <sup>a</sup>	LOS	Delay <sup>a</sup>	$\Delta$ Delay <sup>b</sup>	LOS	Delay <sup>a</sup>	$\Delta$ Delay <sup>b</sup>
South Azusa Avenue and East Railroad Street	B	13.7	B	14.0	0.3	B	14.0	0.3
South Azusa Avenue and Anaheim Puente Road	A	0.3	B	17.6	17.3	A	0.4	0.1
Anaheim Puente Road and East Chestnut Street	A	9.3	B	12.5	3.2	B	13.9	4.6

<sup>a</sup> Delay in seconds per vehicle.<sup>b</sup> Change in delay in seconds per vehicle compared to existing conditions.

### City of Industry Preferred Route

Troy Helling, Planning Assistant with the City of Industry Planning Department was contacted on March 23, 2006. Mr. Helling previously provided traffic counts for the City of Industry and assisted with questions that arose during the AFC Traffic and Transportation section preparation in September/October 2005.

Mr. Helling stated that the City of Industry does not have a preferred route and that the City Engineer has reviewed all three routes (access to/from South Azusa Avenue via East Gale Avenue, Anaheim Puente Road, and Virgil Waters Way). They are all considered to be equally safe.

#### *Telephone conversation with:*

Mr. Troy Helling  
 Planning Assistant  
 Planning Department, City of Industry  
 (626) 333-2211  
 Thursday, March 23, 2006 at 2:30 P.M.  
 Bojana Maric, CH2M HILL

### Conclusion

For inbound travel, both Routes 1 and 3 have their advantages. Route 1 involves a left turn onto East Gale Avenue from South Azusa Avenue, but this will take place at a major, signalized intersection that has adequate capacity. Traffic would then turn right onto South Bixby Drive, and turn left, crossing East Chestnut Street, into the project site. The advantages of taking Route 3 inbound would be that traffic could exit South Azusa Avenue by a right-hand merge onto Virgil Waters Way, could avoid crossing South Bixby Drive/East Chestnut Street traffic to turn into the facility, and also that Virgil Waters Way and East Chestnut Street are less traveled than East Gale Avenue. The disadvantages are that this route is slightly longer than the other routes and that it would require a left-hand turn with a relatively short radius at a three-way stop intersection onto East Chestnut Street.

Route 1 is clearly the preferred outbound route. Traffic on this route turns right onto South Bixby Drive exiting the project site, then left onto East Gale Avenue at a signalized intersection. This route then includes a right turn at the signalized East Gale Avenue/South Azusa Avenue intersection onto South Azusa Avenue. Route 2 outbound would include a potentially hazardous merge into rapidly moving traffic southbound on South Azusa Avenue. Route 3 outbound would not be feasible because it is not possible to turn left (south) from Virgil Waters Way onto South Azusa Avenue.

# Visible Plume Modeling (77-86)

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## Visible Plume Modeling Results

77. *If the applicant performed a visible plume modeling analysis in support of the AFC Visual Resources conclusion, please provide:*
- a. *the modeling results;*
  - b. *any meteorological data used in the analysis;*
  - c. *a full discussion of all assumptions;*
  - d. *the name and version of the model used; and*
  - e. *all model input and output files.*

**Response:** Visible plume modeling is in progress and will be provided under separate cover.

## Visible Plume analysis

78. *If the applicant has not performed a modeling analysis, please provide any analysis that supports the visible water vapor plume discussion in the AFC.*

**Response:** Please see response to #77.

## Meteorological Data Set

79. *If the applicant would like to propose a more representative data set for use in the modeling, please provide five years of meteorological data files in either the National Climate Data Center (NCDC) CD144 (surface data), NCDC-TD3280 (hourly surface observations with precipitation), or Hourly United States Weather Observations (HUSWO) format. The files should be the most recent years available. The files must include present weather, cloud cover, and visibility data. Please include:*
- a. *a complete description of the source of this data (i.e. specific location, anemometer height, etc);*
  - b. *a discussion of why the data is more representative than either Long Beach or Burbank; and*
  - c. *an electronic copy of the raw meteorological data file for each year.*

**Response:** A more representative data set has been found and is currently being processed into CD144 format. Five years of hourly Fullerton Municipal Airport data in ASOS format will be used to prepare the meteorological data file for use in the SACTI computer model. The surface data at Fullerton Municipal Airport will be combined with five years of San Diego Lindbergh Field upper air data (corrected to the surface temperatures at Fullerton). Lindbergh Field is the nearest upper air station to the project site for which the most recent 5 years of data is available.

Fullerton Municipal Airport data is considered a more representative data set than either Burbank for Long Beach for the following reasons:

1. *Proximity to the project site:* The Fullerton Municipal Airport is the closest inland surface data set to the project site. Burbank and Long Beach are located at greater distances.

2. *Representativeness*: The Fullerton Municipal Airport data is considered more representative of the project site than either Burbank or Long Beach. Long Beach is heavily influenced by the close proximity of the Pacific Ocean and is thus more representative of a humid marine environment. Burbank is not directly influenced by the marine environment, but is considerably influenced by the San Gabriel Mountain Range.

This data will be provided under separate cover.

## Data Files

80. *If the applicant proposes a meteorological data set in response to the Data Request above, please also provide meteorological data files for the same five years in ISCST3 format from the same data source. These files must include stability class data.*

**Response:** As stated above, WCE will provide the Fullerton Municipal Airport surface data, in CD144 format, and the San Diego upper air data, in FSL format. We have not found it necessary to convert the data into an ISCST3 meteorological data set to conduct our visible plume analysis. These data sets can be directly processed into an ISCST3 format for use with that model.

## Cooling Tower Operating Values

81. *Please provide the values for heat rejection, exhaust temperature, and exhaust mass flow rate that affect cooling tower vapor plume formation for a range of ambient conditions that represent reasonable worst-case operating scenarios. At a minimum, please fill in all blanks in the table below. Please also update/correct the table, if necessary.*

*Cooling Tower Operating Values*

<b>Parameter</b>	<b>Cooling Tower Exhausts</b>		
<i>Number of Cells</i>	<i>5 cells (in 1 x 5 array)</i>		
<i>Cell Height*</i>	<i>11.89 meters</i>		
<i>Cell Diameter*</i>	<i>6.71 meters</i>		
<i>Tower Housing Length*</i>	<i>66.53 meters</i>		
<i>Tower Housing Width*</i>	<i>11.28 meters</i>		
<i>Ambient Temperature</i>	<i>20°F</i>	<i>59°F</i>	<i>95°F</i>
<i>Ambient Relative Humidity</i>	<i>60%</i>	<i>60%</i>	<i>60%</i>
<i>Heat Rejection (MW/hr)</i>	<i>—</i>	<i>—</i>	<i>—</i>
<i>Exhaust Temperature (°F)</i>	<i>—</i>	<i>—</i>	<i>—</i>
<i>Exhaust Flow Rate (lb/hr)</i>	<i>—</i>	<i>—</i>	<i>—</i>

*\* Stack dimensions from AFC Table 8.1B-2. Tower length and width (not including circulating pumps) estimated from AFC Table 8.1B-3 and 8.1B-4.*

**Response:** Table DR81-1, below, presents the values for heat rejection, exhaust temperature, and exhaust mass flow rate that affect cooling tower vapor plume formation for a range of ambient conditions that represent reasonable worst case operating scenarios.

**TABLE DR81-1**  
Cooling Tower Operating Values

Parameter	Cooling Tower Exhausts		
Number of Cells	5 cells (in 1 x 5 array)		
Cell Height*	11.89 meters		
Cell Diameter*	6.71 meters		
Tower Housing Length*	66.53 meters		
Tower Housing Width*	11.28 meters		
Ambient Temperature	20°F	59°F	95°F
Ambient Relative Humidity	60%	60%	60%
Heat Rejection (MW/hr)	<b><u>23</u></b>	<b><u>26.2</u></b>	<b><u>29</u></b>
Exhaust Temperature (°F)	<b><u>740</u></b>	<b><u>775</u></b>	<b><u>796</u></b>
Exhaust Flow Rate (lb/hr)	<b><u>1,710</u></b>	<b><u>1,686</u></b>	<b><u>1,622</u></b>

\* Stack dimensions from AFC Table 8.1B-2. Tower length and width (not including circulating pumps) estimated from AFC Table 8.1B-3 and 8.1B-4.

### Plume Mitigation

82. *Please indicate if the cooling tower has any plume mitigation features that would reduce the exhaust moisture content below the saturated level.*

**Response:** The cooling does not have any features specifically designed to mitigate plumes.

### Cooling Tower Make and Model

83. *Please provide the cooling tower make and model number, and any vendor documentation available for the specific model.*

**Response:** The cooling tower manufacturer has not yet been selected. However, possible selections include Cooling Tower Depot model number CFD-424230-51-30 and Marley model number F467A-4.0-05.

### Vendor's Fogging Frequency Curve

84. *Please provide a fogging frequency curve from the cooling tower vendor, if available.*

**Response:** A fogging frequency curve is not yet available from the cooling tower vendor.

## Cooling Tower Cell Operation

85. *Please indicate how many cooling tower cells will be turned on under different partial load conditions (i.e. when will all five cells be on, when will four cells be on, when will two cells be on, etc.?). Please also note if ambient conditions, such as cold temperatures, dictate when cells may be turned off.*

**Response:** There are a large number of possible cooling tower fan operating scenarios. In general, the number of operating cells will be proportional to the ambient temperature and plant output (MW). For example, with all five turbines operating at full load on a high ambient temperature day, all five cells would be in service. At the other extreme, if one turbine were operating at minimum load (50 percent) and the ambient temperature were very low, no cooling tower fans would be operating (although water would be circulated through the tower). Typically, one cell will be in service for each turbine that is operating.

## Cooling Tower Fan Motors

86. *Please confirm that the cooling tower fan motors will not have a variable speed/flow controller.*

**Response:** The project does not have a variable speed control on the fans. Two-speed fan control may be added at a later date, when the final design is optimized.

# Visual Resources (87-91)

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## Existing Visible Emissions

87. *Please describe and analyze the size and frequency of any existing, commonly occurring, visible industrial emissions within a one-mile radius of the proposed facility and the cumulative visual effect such atmospheric emissions may cause in combination with those of the proposed facility.*

**Response:** Several businesses in the City of Industry and in the general project area involve the use of industrial processes that generate steam vapor plumes. These include food processing, manufacturing, and warehousing businesses.

## Existing Plumes in the Project Vicinity

To respond to this request, observations were made of plume conditions in the area within one mile of the project site during the early morning hours of March 22, 2006. Because this morning was relatively cool, with the lowest temperature in the range of 44°F, and because there was relatively little wind, conditions were favorable for the formation of visible plumes.

The observations revealed that although plumes exist within the portion of the industrial corridor within one mile of the proposed project site, there are relatively few of them and that in general, they are not large. The plumes and potential plume sources identified in the area within one mile of the project site are described below, and their locations are marked on the air photo presented as Figure DR87-1. All of the addresses noted are located within the City of Industry.

The largest plume visible in the area within one mile of the project site is the steam plume that emanates from one of two stacks located at Nutro Products, a manufacturer of premium dog and cat foods, at 445 South Wilson Way. This facility is located 0.75 mile to the northwest of the project site. Figure DR87-2A is a view of this plume as it appears in the early morning as seen from KOP-1 overlooking the valley in which the City of Industry is located. Figure DR87-2B is a view of this plume as it is seen from Wilson Way in front of the Nutro Products facility.

Semco Enterprises, located at 475 South Wilson Way, next door to Nutro Products and 0.75 mile to the northwest of the project site, is a zinc alloy die casting facility. As review of Figure DR87-2B indicates, this facility has four short stacks. On the morning that observations were made, a small, faint black plume was emanating from one of the stacks.

Langer Juice Company, located at 16195 Stephens Street, 0.25 mile to the northwest of the project site is a large juice production and distribution facility with a set of vents on its roof that is the source of a small number of small steam plumes. These plumes are visible in Figure DR87-3B, a view toward the southwest from KOP-1.

A large warehouse structure located at 16633-16725 Gale Avenue, 0.12 mile to the southeast of the project site houses a variety of companies, including C.U. Transport, Inc., and Roma, a food company. On the roof of a small building extension on the structure's north side, is a pair of small evaporative coolers that chill air that is likely to be used for some combination of refrigeration and air conditioning purposes. On the morning the observations were made,

one of the two evaporative coolers was running, producing a small plume. Figure DR87-4B is a close-up view of the evaporative coolers and the plume, and Figure DR87-4A is a view of this plume as seen from KOP-1. In the photo of the plume as seen from KOP-1, the project site is visible as the area occupied by the long, gray warehouse building located to the right of the warehouse from which the plume is emanating.

An evaporative cooler was observed immediately behind a large warehouse building located at the northern end of John Reed Court, 0.30 mile to the southeast of the project site. At the time the observations were made, this cooler was not operating and was thus not creating a plume.

Pac Foundries occupies a building at 16800 Chestnut Street, 0.25 mile to the east of the project site. On the morning the observations were made, several small plumes were seen emanating from piping on the facility's roof. Although these plumes were visible at close range, they were not detectable from KOP-1 on the hillside above the valley.

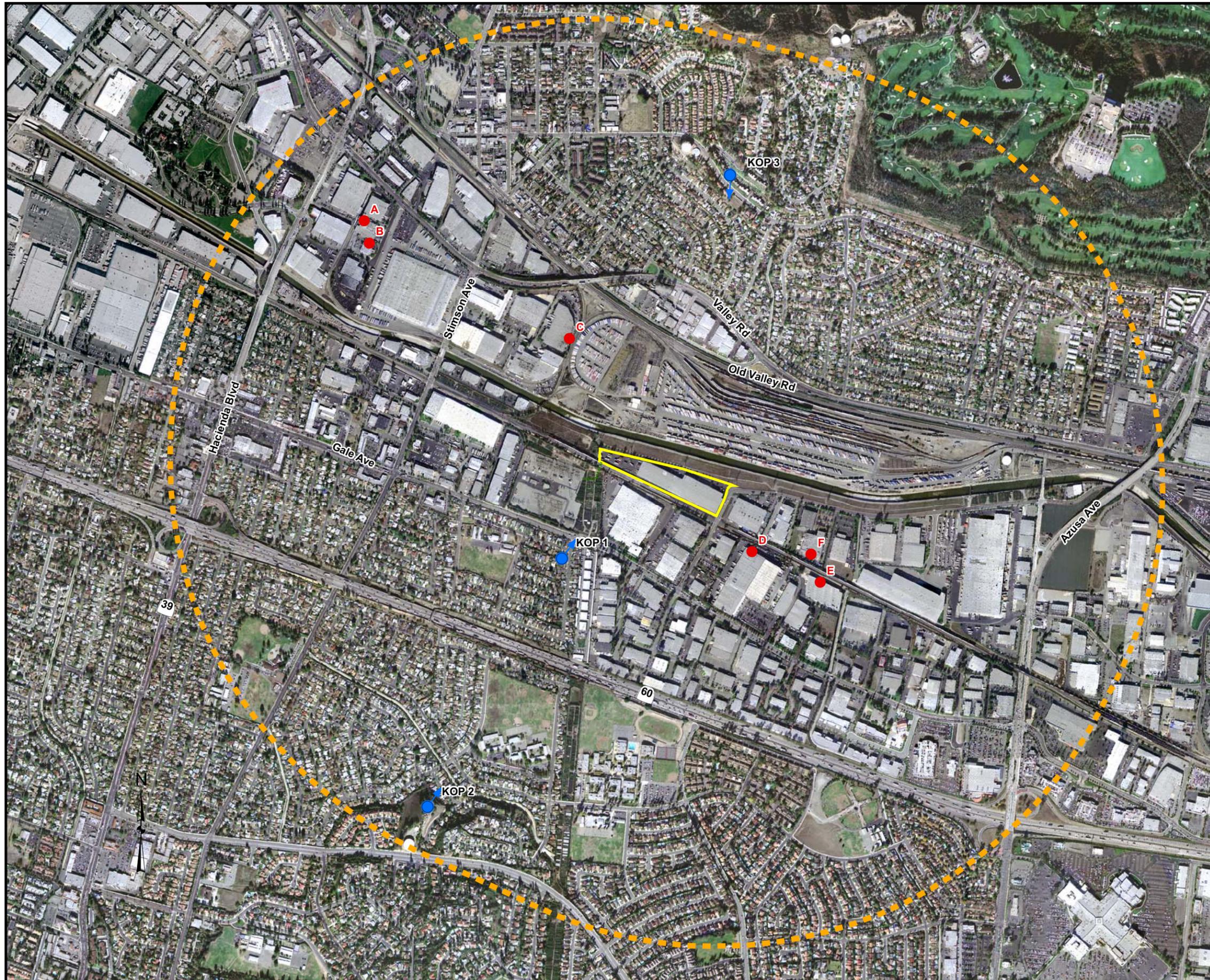
### Potential Cumulative Plume Impacts

Because of the existing small steam plumes that are now visible at dispersed locations in the industrial corridor in which the project site is located, the plumes associated with the Walnut Creek Energy Park will not add an entirely new element to views of this industrial corridor that are seen from the surrounding residential areas. As indicated in the analysis submitted as a part of the AFC, the proposed power plant will be a peaking plant, and will be operating only about 35 percent of the time. Because the plant's operation will occur during periods of peak electric loads, which tend to be on hot summer afternoons, a time when plumes are unlikely to form, the potential for plume formation associated with the turbine stacks and cooling tower will be very low. In addition, given the operational characteristics of the turbines and the cooling towers, at such times that plumes might be generated, they will not be exceptionally large. Because visible plumes associated with the operation of the proposed power plant will appear at a very low level of frequency and will not be large, the project by itself will not create a significant aesthetic impact related to addition of visible plumes to the project setting. Because the background level of plumes in the project area is relatively low, there is little potential for the plumes associated with the proposed project to combine with the existing plumes to create visual effects in views from surrounding residential areas that would be considered to be cumulatively significant.

### KOP Views

88. *Please re-scale the KOP views and simulation images to achieve life-size scale. After re-scaling, please provide high quality 11" x 17" color photo copies of the existing views and simulation images for each of the three KOPs.*

**Response:** Attachment VIS-1 contains the KOP views and project simulations formatted to print in a larger size (11" x 17" paper) than was provided in the AFC. The views and simulations themselves have not changed except that the KOP views (without project) and simulated views (with project) will now print on separate pieces of 11" x 17" paper, instead of printing on the same piece of 11" x 17" paper, as in the AFC.



**LEGEND**

-  Project Site
-  1 mile radius around Project Site
-  Key Observation Points (KOPS)
-  Potential Plume Sources
- A** Nutro Products  
475 Wilson Way
- B** Semco Enterprises  
475 Wilson Way
- C** Langer Juice Company  
16195 Stephens St
- D** Warehouse  
1663 - 16752 Gale Ave
- E** Warehouse  
End of John Reed Ct
- F** Pac Foundries  
16800 Chestnut Ct



**FIGURE DR87-1  
PLUME SOURCES WITHIN 1 MILE  
OF PROJECT SITE**

WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



A. Plume from Nutro Products stack seen from KOP-1.



B. Nutro Products stack viewed from Wilson Way.

**FIGURE DR87-2**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



A. Semco Enterprises viewed from Wilson Way.



B. Steam from vents at Langer Juice Company viewed from KOP-1.

**FIGURE DR87-3**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



A. Plume from Warehouse at 16639-16725 Gale Avenue, seen from KOP-1.



B. Close-up of cooling equipment and plume at Warehouse at 16639-16725 Gale Avenue.

**FIGURE DR87-4**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



Evaporative cooler behind Warehouse at end of John Reed Court.

**FIGURE DR87-5**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA

## Electronic Files

89. *Please provide the electronic files of the re-scaled views and images.*

**Response:** Electronic files of the views and images, formatted for printing on 11" x 17" paper, have been provided separately on a CD-ROM.

## Development Plans

90. *Please prepare and submit a set of development plans for our review that contain all of the components relative to Site Plans and Elevation Plans, as required by the City's Development Guidelines and Development Plan Application (paragraphs A and C) process.*

**Response:** The WCEP will conform to the City of Industry's requirements as determined through the City's review of the AFC. As the City has not yet made a final determination regarding development plan and landscaping requirements, the City's final requirements are not available at this time.

## Landscape and Irrigation Plan

91. *Please provide a landscape and irrigation plan that contains all the components required by the City.*

**Response:** See the response to Data Request #90.

# Attachment VIS-1

Large-Format Prints of Project Simulations

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KOP-1. Existing view toward the project site from Fieldgate Avenue at the corner of Folger Street.

**FIGURE 8.13-2A**  
**KOP-1 - RESIDENTIAL AREA**  
**IN PROXIMITY TO THE SITE**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



KOP-1. Simulated view of the proposed project as seen from Fieldgate Avenue at the corner of Folger Street.

**FIGURE 8.13-2B**  
**KOP-1 - RESIDENTIAL AREA**  
**IN PROXIMITY TO THE SITE**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



KOP-2. Existing view toward the project site from a viewpoint on South Piermont Drive in Hacienda Heights.

**FIGURE 8.13-3A**  
**KOP2 - SOUTHERN HILLS**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



KOP-2. Simulated view of the proposed project as seen the South Piermont Drive viewpoint.

**FIGURE 8.13-3B**  
**KOP2 - SOUTHERN HILLS**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



KOP-3. Existing view toward the project site from a viewpoint on Main Street in La Puente.

**FIGURE 8.13-4A**  
**KOP-3 NORTHERN HILLS**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA



KOP-3. Simulated view of the proposed project as seen from the Main Street viewpoint.

**FIGURE 8.13-4B**  
**KOP-3 NORTHERN HILLS**  
WALNUT CREEK ENERGY PARK  
CITY OF INDUSTRY, CALIFORNIA

# Waste Management (92-97)

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## Warehouse Demolition

92. *Please clarify whether demolition of the warehouse and removal of hazardous wastes including asbestos will be entirely the responsibility of the City of Industry Urban Development Agency.*

**Response:** The City of Industry (City) through its Urban Development Agency owns the property and will be entirely responsible for the demolition of the warehouse.. The City has stated that the purpose for demolishing the warehouse is to make the parcel available for a higher and more revenue generating use. The City has further stated that the demolition is not related to approval of the WCEP. In other words if the WCEP is not approved, the City intends to demolish the warehouse and find another lessee for the property. As the property owner and as the entity carrying out the demolition, the City will also be entirely responsible for removing any asbestos or hazardous wastes that result from the demolition.

## Site Remediation

93. *Please discuss if remediation of the site will be required before the property is turned over to WCE. If remediation will be required, please provide a description and schedule.*

**Response:** EME has no way to determine whether the site will require remediation before the property is turned over to WCEP. As part of EME's standard due diligence, EME will review all information available on the site prior to occupancy to ensure the site meets regulatory requirements and is safe for construction and operating personnel. The City of Industry Urban Development Agency has the responsibility for the site prior to the execution of the Lease Agreement.

## Electronic Waste

94. *According to the Phase 1 ESA Update, Coastal Group/ARC is processing electronic waste at the property. The samples from the temporary groundwater monitoring wells indicate that chromium and lead levels are above screening levels.*
- a. *Please confirm whether Coastal Group/ARC processes materials containing lead or chromium.*
  - b. *Please discuss whether Coastal Group/ARC's activities have the potential for adding additional lead and chromium contamination on the proposed project site.*

**Response:** Coastal Group/ ARC dismantles electronic equipment for offsite metals recovery. Electronic equipment is known to contain lead and chromium; however, no processing or metals reclamation, which would be expected to result in soil or groundwater contamination, takes place at the South Bixby Drive site. In addition, the dismantling and packaging of the electronic equipment is conducted within a covered warehouse on a concrete pad. The remainder of the truck storage and staging areas are on asphalt. The more likely source of the low level metals contamination is regional in nature (see discussions in Phase I Environmental Assessment and groundwater studies, AFC Appendix 8.14).

## Onsite Remediation

95. *Please discuss if there is potential for onsite remediation of the Superfund plume, such as adsorption systems and monitoring wells.*

**Response:** WCE does not intend to engage in any onsite remediation of the Superfund plume. If such remediation were required by regulatory agencies, WCE believes this would be the responsibility of the landowner and/or agencies administering the Superfund program. Furthermore, the construction and excavation activities at the site should not result in any communication with the groundwater table. Any contaminated water encountered during construction and subsequent dewatering would be tested to determine appropriate disposal methods and personnel protective equipment requirements.

## Superfund Remediation

96. *Please discuss how the project's final design will incorporate potential Superfund site remediation.*

**Response:** In the unlikely event that the City of Industry Urban Development Agency is required to participate in remediation of the Superfund site or the installation of treatment systems, WCE will work closely with the City to ensure that any treatment systems do not present a risk to site personnel or the operational reliability of the plant.

## Soil Sample Analysis

97. *Please collect and analyze the recommended soil samples and provide the results to staff.*

**Response:** In the event the WCEP project moves forward and prior to occupying the site, WCE will evaluate the need to collect additional soil samples. This decision will be based on the information provided by the City of Industry Urban Development Agency and the results of our due diligence efforts.

## Additional Information:

CEC Staff has brought it to our attention that Data Request #77 for the Sun Valley Energy Project is also applicable to the WCEP. This Data Request is as follows:

**Background:** Sections 8.14.1.2.1 and 8.14.1.2.2 (pages 8.14-1 to 8.14-3) indicate that approximately 115 tons of non hazardous waste will be generated during construction and about 35 tons/year of non hazardous waste during operations. Section 8.14.2.4 (page 8.14-7) however, suggests that approximately 850 tons of nonhazardous waste will be generated during construction and 14,000 tons/year (including 3 tons of hazardous waste) during operations. Further, the operational phase hazardous waste estimates in Table 8.14-1 (page 8.14-4) do not reconcile with the 3 tons identified in Section 8.14.2.4.

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

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

#### 8.14.2.4 Waste Disposal Summary

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