CALIFORNIA ENERGY COMMISSION
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October 31, 2006

Mr. Kevin R. Johnson, Vice President
LS Power Generation, LLC
1735 Technology Drive Suite 820
San Jose, California 95050

DOCKET
06-AFC-3
DATE OCT 31 2006
RECD. OCT 31 2006

Dear Mr. Johnson:

RE: SOUTH BAY REPLACEMENT PROJECT (06-AFC-3)
DATA REQUESTS 1 through 98

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

These data requests are being made in the technical areas of the Application for Certification (AFC), including: Air Quality, Alternatives, Biological Resources, Cultural Resources, Hazardous Materials, Land Use, Public Health, Socioeconomics, Traffic and Transportation, Transmission System Engineering, Waste Management, Water and Soil Resources, Worker Safety and Visual Resources. Written responses to the enclosed data requests are due to the Energy Commission staff on or before November 31, 2006, or at such later date as may be mutually agreed upon.

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

If you have any questions regarding the enclosed data requests, please call me at (916) 654-4206.

Sincerely,

BILL PFANNER
Energy Facility Siting Project Manager

Enclosure

cc: Docket (06-AFC-3)

Technical Area: Air Quality
Author: Tuan Ngo

BACKGROUND: FUEL SULFUR CONTENT

The AFC states that the facility will use natural gas with an assumed maximum short-term sulfur content of 0.75 grains per hundred standard cubic feet (gr/100scf), but on an annual average, the sulfur content of natural gas would not exceed 0.25 gr/100scf.

DATA REQUEST

1. Please provide documentation from the proposed natural gas supplier of the guaranteed peak and average fuel sulfur content levels.
2. Please provide the most recent six months of daily peak and average gas sulfur content values from the proposed natural gas supplier, collected at the nearest available location to the proposed facility gas tie-in. If daily peak and average values are not available, please provide either weekly or monthly sulfur content values, whichever is available, with an explanation as to why short term measurements are not available.
3. Please provide the steps and method the applicant will use to ensure continuous compliance with the sulfur content limits specified for the supplied natural gas fuel.

BACKGROUND: START UP AND SHUT DOWN EMISSIONS

Table 8.1-21 lists the maximum start up emissions of each turbine as 320 pounds per hour (lbs/hr) for oxides of nitrogen (NOx), 2,000 lbs/hr for carbon monoxide (CO), and 32 lbs/hr for volatile organic compounds (VOC). The footnote of this table states that the facility maximum hourly emissions will not exceed the above limits regardless of whether one of both turbines are simultaneously in start up mode.

DATA REQUEST

4. Please explain the steps that the applicant will take to ensure continuous compliance with the facility's hourly, daily and annual emission limits during start ups and shut downs.

BACKGROUND: DUCT BURNER USAGE

The AFC section 8.1.5.1.1 states that duct firing "will be used infrequently (typically less than a 10 percent capacity factor on an annual basis)...." Appendix Table 8.1B-4 uses two different assumed duct firing assumptions: 800 hours per year to calculate the NOx emissions and 500 hours per year to calculate all other air contaminants.

DATA REQUEST

5. Please provide the maximum hours per year the facility would operate with duct burner and provide any associated assumptions and calculated emissions levels.

BACKGROUND: ESTIMATED FACILITY EMISSIONS

The AFC section 8.1.5.2 provides tables, assumptions, and explanations of calculations used to estimate the facility air contaminants emissions. This section references Appendix 8.1B for specific assumptions used in each calculation steps. Appendix 8.1B contains numerous tables showing the results of the calculations for the facility's emissions without supporting explanations and discussions of the necessary assumptions. As a result, staff cannot reproduce the facility's emissions that are listed throughout AFC Section 8.1.5.2 and Appendix 8.1B.

DATA REQUEST

6. Please provide the maximum number of start up and shut down events on a daily and annual basis.
7. Please provide actual calculations, assumptions, and methods used to estimate the facility daily and annual emissions provided in Tables 8.1-23 and 8.1-26.
8. Please provide the maximum annual operation hours for the auxiliary boiler.
9. Please provide turbine vendor guarantees to support the proposed emissions values listed in Appendix 8-1B.
10. Please provide explanations for footnote c of Table 8.1-23, which states that "... maximum annual VOC emissions occur under an operating scenario that does not include startups...." This statement does not support the maximum and average hourly start ups and shut down emissions that are provided in Table 8.1-21.
11. Please provide estimates of ammonium nitrates and ammonium sulfates, including any assumptions used, due to estimates of 226.9 tons of annual ammonia emissions.

BACKGROUND: CALCULATION OF EXISTING SBPP BASELINE EMISSIONS

Similar to the above background statement on the facility's estimated emissions above, the AFC section 8.1.5.2.2 consists of one paragraph that describes how the existing South Bay Power Plant (SPBB) baseline emissions were calculated using the fuel use records for the immediate preceding two years prior to the preparation of the SBRP AFC. The rest of the calculations referred to Appendix 8.1B, however, calculations, explanations and assumptions used are not included in Appendix 8.1B.

DATA REQUEST

12. Please provide detailed step by step calculations and specific assumptions used to calculate the SBPP facility baseline emissions of each criteria and non-criteria air contaminants.
13. Please explain why emission factors were taken from the Environmental Protection Agency's (EPA) AP-42 publication, instead of providing actual source test results used to calculate the SBPP baseline emissions.

14. Please provide specific amounts of each type of liquid fuel (bunker No.6 and jet fuel), on a quarterly basis, that were used at the existing facility in 2004 and 2005.
15. Please provide copies of existing permits for existing SBPP units 1 to 4 and the SBPP combustion turbine.
16. Please provide summaries of the most current source test results for the above boiler and combustion turbine units.
17. Please provide explanations of why Reasonably Achievable Control Technology (RACT) emission limits were not used to adjust the SBPP facility baseline emissions.

BACKGROUND: POTENTIAL PSD APPLICABILITY

The AFC states that the new project would replace the existing SPBB, and that the net emission increases would not exceed the federal Prevention of Significant Deterioration (PSD) threshold; therefore, the project is not a major modification.

The AFC Section 1.9 states that the services of the existing "...SBPP will continue indefinitely until there are changes to the regional power plant and transmission system and CAISO removes the RMR status for SBPP."

Therefore, it appears that the modification to this stationary source would result in a net emission increase of each criteria air contaminant equal to the new emissions of the proposed SBRP, identified in Table 8.1-34, at least until the shut down and demolition of the existing SBPP is completed. Therefore the project can be viewed as a major modification to a major stationary source and thus may require a complete PSD review analysis.

DATA REQUEST

18. Please provide detailed analysis to demonstrate that the facility, which includes the proposed project and the existing SBPP, is exempt from PSD review during any overlapping commissioning, operation, and demolition scenarios for the existing and replacement units.

19. If you cannot demonstrate that the proposed project and the SBPP exempt from PSD review, please provide additional discussion and analysis demonstrating compliance with the PSD requirements, including, but not limited to: (a.) identification of Class I and Class II areas; (b.) identification of potential impacts and mitigation in such areas; (c.) revised modeling analysis to include both proposed and existing project in operation; and (d.) a revised incremental analysis.

BACKGROUND: AMMONIA EMISSIONS

The AFC Section 8.1.5.2.4 identifies that the project would maintain ammonia emissions of 10 ppm at the selective catalytic reduction (SCR) system exhaust.

DATA REQUEST

20. Please provide an explanation of why SCR systems with ammonia slip at 5 ppm or less are not technically feasible and cost-effective, or provide other documentation to support the proposed SCR with 10 ppm ammonia slip.

BACKGROUND: AIR QUALITY IMPACT ANALYSIS

The AFC Section 1.9 states that the services of the existing "...SBPP will continue indefinitely until there are changes to the regional power plant and transmission system and CAISO removes the RMR status for SBPP." Thus, for a number of weeks, months or years, it is likely that both the proposed project and the SBPP will simultaneously be operating. Therefore, regardless of whether the proposed project and the SBPP could be exempt from the PSD review, it is necessary to determine the combined air quality impacts of both projects in operation through air dispersion modeling analyses.

DATA REQUEST

21. Please describe the modeling inputs (stack height, stack diameter, volumetric flow rate, and emission rates of NOx, CO, PM10 and SO2 for the existing boilers and combustion turbine) that would be used in an air dispersion modeling analysis of the existing SBPP.

22. Using the input parameters from the data request above, provide an air dispersion modeling analysis (using the same modeling approach provided in the AFC), of the simultaneous operation of both the SBPP under "normal" operation and the SBRP under the worst case initial commissioning scenario. Provide all input and output files in CD form.

23. Please execute the modeling analysis in data request 22 for the SBRP operating under the worst case normal operations with all input and output files in CD form.

24. Provide summary tables of the results of the modeling analysis performed for the data requests above in a format similar to AFC Table 8.1-30.

BACKGROUND: IMPACTS DURING FACILITY OPERATING AND DEMOLITION OF SBPP

The AFC sections 1.9 and 8.1.5.5 appear to be in conflict regarding whether and when the existing SBPP would be shut down and be demolished until the SBRP is fully operational (p. 8.1-51). Section 8.1.5.5 also states that a detailed analysis of the emissions and ambient impacts is included in Appendix 8.1F. Staff found that Appendix 8.1F has analysis of emissions and impacts for construction activities for the proposed project, but has not been able to find substantive material on the emissions and impact due to demolition of the existing SBPP.

DATA REQUEST

25. Please describe the modeling inputs for NOx, CO, and PM10 that would be used in an air dispersion modeling analysis of the demolition of the existing SBPP.

26. Please provide an air dispersion modeling analysis (using the same modeling approach provided in the AFC), of the simultaneous commissioning or operation of both the proposed project and the demolition of the existing SBPP. Provide all input and output files in CD form.

27. Provide summary tables of the results of the modeling analysis performed in the data request above in a format similar to AFC Table 8.1-30.

BACKGROUND: TURBINE COMMISSIONING

Section 8.1.5.3.3 identifies several scenarios where the proposed turbines undergo various operations with and without emission control systems in operation. Under the full speed, no load test (phase 1) the turbines' worst case NOx emissions can be as high as 100 ppm; under the minimum load test (without control, phase 2), the turbines' NOx emissions would be in the range of 9 ppm; and under full speed, no load (without control, phase 3) the NOx emissions would be 5.5 ppm.

DATA REQUEST

28. Please provide an explanation of why the turbines' NOx emissions vary from 5.5 ppm to 100 ppm during commissioning even though no control systems are in operation.

29. The turbines that are proposed in the AFC are the GE Frame 7F. Please explain why the applicant chose to use the experiences of commissioning the GE Frame 7EA turbines at the Turlock Irrigation District's Walnut Energy Center (02-AFC-4C) instead of the many Frame 7F projects that have seen commissioning in California in recent years (Sunrise, Elk Hills, Los Medanos, Delta, Moss Landing, Pastoria and Palomar).

BACKGROUND: TEMPORARY OFFSETS

Section 8.1.6.3.2 of the AFC describes the proposed project as a modification to an existing stationary source, i.e., the new SBRP will replace the existing SBPP facility and units, therefore, contemporaneous emission reductions from the shut down of existing SBPP facility would be used to offset the new emissions from the SBRP. In other words, the stationary source's post project emissions would be as much as, or exceed, the existing facility's pre-project emissions. However, as indicated in Section 1.9, the shut down of the existing SBPP facility is not entirely based on the decision of the applicant. Without enforceable permit condition(s), for both the proposed project and the existing SBPP, emission reductions from the shut down of the existing SBPP may not be contemporaneous, real, actual, permanent and enforceable. Therefore, it appears that the real impacts to the environment may have been severely underestimated, at least for a period when both plants are operating.

DATA REQUEST

30. During the period when the SBPP is still operated along side of the new SBRP, please provide additional temporary emission reductions to mitigate the project's emission impacts.

31. Please provide detailed calculations, and any and all assumptions used to estimate the temporary emission reductions identified above.

BACKGROUND: REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) ADJUSTMENT OF OFFSETS

Other issues involve evaluating the emission reductions from the shut down of the existing SBPP including the detailed calculations using actual test results, and the adjustment of the reductions for RACT. These factors could reduce the amount of available emission reductions. Again the foreseeable impacts from the operations of the SBRP may have been severely underestimated and under mitigated.

DATA REQUEST

32. Please identify steps that the applicant will take to secure sufficient and fully adjusted emission reductions of NOx, VOC, SOx, PM10 and PM2.5, including ammonia derived secondary PM2.5, to mitigate the proposed project impacts.

BACKGROUND: CUMULATIVE IMPACTS ANALYSIS

Section 8.1.7 states that an approved protocol for conducting a cumulative impacts analysis is included in Appendix 8.1H of the AFC.

DATA REQUEST

33. Please provide the cumulative impacts analysis or identify the timeline for completion and submittal of the cumulative impacts analysis.

BACKGROUND: SOx MITIGATION

Section 8.1.8 states that the project will result in net reductions of NOx, VOC and PM10 emissions and an increase in SOx emissions. Table 8.1-25 shows that the proposed project would result in a net SOx emission increase of 4.1 tons per year (TPY) after the shut down of SBPP. Because the SOx emissions increase would be below the District threshold for providing offsets, no SOx mitigation is required. However, since SOx is a precursor to PM10 and PM2.5 and the area is non-attainment for both the state's PM10 and PM2.5 standards, the increase of SOx emissions should be mitigated.

DATA REQUEST

34. Please discuss the steps that applicant will take in providing 4.1 TPY additional SOx emission reductions to mitigate the project's SOx emission contribution to the ambient air quality.

35. Please provide a schedule for obtaining the additional 4.1 TPY of SOx emission reductions.

Technical Area: Alternatives
Author: Susan Lee

BACKGROUND

The California Environmental Quality Act (CEQA) requires that a reasonable range of alternatives be considered. The applicant has identified six alternative sites to study including four at inland locations. Depending on the project's potentially significant impacts and mitigation, staff may need to study other sites.

DATA REQUEST

36. Given that the current South Bay Power Plant design incorporates air cooling and eliminates the need for Bay water, please discuss the reasons LS Power has for needing to build on a coastal site, as opposed to an inland site.

BACKGROUND:

In order to compare environmental impacts of alternative sites with the impacts of the proposed South Bay site, it is important to understand the relationship of the existing facility with the new facility, and the timing of removal of the existing South Bay plant.

DATA REQUESTS:

37. If the South Bay plant was replaced at a different location, please discuss whether the existing South Bay facility would be closed and demolished according to the same timeframe proposed in the AFC.

BACKGROUND:

Figure 9.5-1 (Location of Alternative Sites Considered) in the AFC depicts the North County Inland Site #3 as being located west of Interstate 15, near Fallbrook. However, the air photo and map provided in Data Response Set 1A (Google Maps air photo) depict the site as being located on Rainbow Heights Road, east of Interstate 15 and southeast of the town of Rainbow. The site is described as being owned by SDG&E and as having a transmission line bisecting it.

DATA REQUESTS:

38. Please state which location for North County Inland Site #3 is correct. If the Fallbrook location is correct, provide a detailed map and directions for getting to the site. If the site included in Data Response, Set 1A is correct (the site east of I-15, near Rainbow), explain the rationale for choosing this site for possible location of a power plant. The site is in a very remote location, in an area of rural residences, and is accessible only by narrow and partially paved roads.

South Bay Replacement Project (06-AFC-03)
Data Request

Technical Area: Biological Resources
Author: Joanna Grebel

BACKGROUND

Telegraph Canyon Creek flows through the South Bay Power Plant (SBPP) project site. Although it is cement lined, sediments from stormwater discharges upstream accumulate and support sparse wetland vegetation. The mouth of the creek supports both coastal salt marsh habitat and riparian vegetation. The estuary seablite (*Suaeda esteroa*), a special status plant species, was found inhabiting the mouth of Telegraph Canyon Creek. Hundreds of waterfowl and shorebirds were also found to congregate at the mouth of Telegraph Canyon Creek during 2006 field surveys. Additional sedimentation, potentially resulting from construction activities, can have adverse impacts on flora and fauna inhabiting the creek. The AFC states that Telegraph Canyon Creek may fall under the jurisdiction of the U.S. Army Corps of Engineers and require a Federal Clean Water Act Section 404 permit and a Section 401 water quality certification from the San Diego Regional Water Quality Control Board.

DATA REQUESTS

39. Please provide detailed information (i.e. correspondence with agencies) on the status of federal and state consultations for the Section 404 permit and the Section 401 certification. Please indicate when permit applications have been/will be filed and explain the schedule for completing the federal process.

40. Please provide a discussion of direct and indirect impacts to species inhabiting the creek and any species-specific mitigation measures proposed by the applicant.

BACKGROUND

The AFC indicates that there is evidence of wetland vegetation on site and states that indicator species were found "...suggesting the area is developing marginal wetland characteristics", yet concludes no wetlands are present on site.

DATA REQUEST

41. Please explain the conclusion for the absence of wetlands, in the presence of wetland indicator species on both SBPP and SBRP sites.

BACKGROUND

Demolition of SBPP would include removal of the headwall from the intake and effluent channels, with the shoreline being reconstructed to match the existing hard shore infrastructure. Headwall demolition could introduce sediments into the bay that could affect marine resources, both directly and indirectly. Construction activities occurring in the shoreline and bay water can elevate turbidity levels that could decrease the

photosynthetic ability of phytoplankton, kelp, and eelgrass and reduce the ability of sight-foraging birds to see and catch their fish prey in the Bay's water columns.

DATA REQUESTS

42. Please discuss the headwall removal process, including the timing (seasonality) of the removal, what type of equipment will be used, disposal of headwall debris, and any engineering plans necessary for removal. Discuss measures to be used for marine species that would be affected by headwall removal
43. Please provide information on how the riprap will be restructured and what will be done to mitigate any temporary or permanent impacts to sensitive species. Please include a discussion of the timing (seasonality) of the rip rap removal, what type of equipment will be used, and any engineering plans that may be necessary for removal.
44. Please describe the Best Management Practices that will be used to minimize sedimentation impacts to marine resources.

BACKGROUND

The eastern populations of green sea turtles (*Chelonia mydas agazzizii*) are designated as federally threatened by the United States Fish and Wildlife Service. The South San Diego Bay is the only location on the west coast that supports turtle aggregations. A small population of green sea turtles utilizes the warm effluent from the once-through cooling system of the current South Bay Power Plant. Considering the level of federal protection to green sea turtles, evidence that is more scientific is needed to support the applicant's conclusions that there will be no significant impact to green sea turtle populations.

DATA REQUESTS

45. Since the sea turtles in San Diego Bay use the SBPP area for feeding, please discuss the proximity of the nearest suitable feeding areas. Address how the elimination of the SBPP area feeding grounds in the San Diego Bay would affect survivorship rates.
46. Please provide a discussion of potential impacts to the green sea turtle population as a whole if the turtle population is adversely impacted.

BACKGROUND

The applicant has listed a number of permits and consultation documents that will be required from federal and state agencies as they relate to federally listed bird species and green sea turtles, as well as other species of concern.

DATA REQUEST

47. Please discuss the status of a federal Biological Opinion (pursuant to Section 7 of the Endangered Species Act) and a California Department of Fish and Game (CDFG) Consistency Determination. Please provide copies of any correspondence letters and records of conversation with the U.S. Fish and Wildlife Service and CDFG related to this request.

BACKGROUND

Eelgrass (*Zostera marina*) beds are a submerged plant community that fringes the south San Diego Bay intertidal zone and are broadly protected as a Special Aquatic Site under Section 404 of the Clean Water Act. Eelgrass provides food and cover for many species of invertebrates and fish, which in turn provide a food base for many bird species, including the federally endangered California least terns. The federally endangered green sea turtle also feeds on eelgrass.

DATA REQUESTS

48. Please include a map detailing the location of eelgrass beds in southern San Diego Bay in the SBPP area.
49. Please describe what mitigation measures would be taken if eelgrass beds cannot be avoided and what would be done to mitigate any temporary or permanent impacts to eelgrass beds from destruction of the headwall.

BACKGROUND

The propagation of noise, both above land and below water, has the potential to impact animals. Construction and demolition activities can increase noise levels which have adverse impacts to wildlife including discouragement of foraging, nest abandonment, and decrease in reproductive success. Loud or sustained noises in the underwater environment have the potential to adversely impact marine organisms including fish, marine mammals, and turtles.

DATA REQUESTS

50. Please describe specific types of demolition activities proposed for the marine environment.
51. Please include an estimate of sound levels, attenuation distances, and what, if any, sensitive species (marine and terrestrial) could be impacted from construction of the proposed power plant, the demolition of the existing power plant, and operation of the proposed power plant.
52. Please discuss both direct and cumulative noise impacts expected to affect biological resources from construction, demolition, and operation activities.

South Bay Replacement Project (06-AFC-3)
Data Request

Technical Area: Cultural Resources
Author: Beverly E. Bastian

BACKGROUND

The design of the proposed South Bay Replacement Project (SBRP) would include the underground installation of various transmission lines and plant utilities. In addition, a new stormwater retention basin will be constructed, possibly by excavation. Excavation dimensions and methods were provided in the AFC for some of these structures, but not for others. Staff needs to know the dimensions and excavation methods of the required excavations to assess their potential impacts on possible buried cultural resources.

DATA REQUESTS

53. Please provide the width and depth of the trench or trenches for the underground 230 kV loop-in from the Otay Mesa Power Purchase Agreement Transmission Project line to the interim 230 kV substation.
54. Please provide the depth of the holes for the two supports (H-frame structure and single pole structure) of the 230 kV overhead interconnection between the proposed new steam turbine generator step-up transformer and the proposed new 230 kV substation.
55. Please provide the location, depth, and excavation method of the excavations for splice boxes, if any, for all underground transmission lines.
56. Please provide the depth and excavation method of the excavation required for the underground piping and pigging facilities for the natural gas metering station.
57. Please provide the excavation method and the depth of the trench for the potable water supply pipeline.
58. Please provide the excavation method and depth of the trench for the waste water disposal pipeline.
59. Please provide the greatest depth of the excavation necessary to create the stormwater retention basin.

BACKGROUND

The AFC (p. 2-3) refers to a 300-foot-wide existing SDG&E utility easement running along the entire east side of the parcel on which the proposed SBRP would be built and, apparently, extending north to K Street, where the proposed natural gas pipeline for the project would tie in to an existing SDG&E gas line. The AFC describes the easement as disturbed ground. The AFC also states that the proposed SBRP site, the existing South Bay Power Plant (SBPP) site, and the proposed appurtenant linear facility routes were surveyed for cultural resources on February 14, 2006. From the AFC, it is not clear that the easement was surveyed, and no information was included detailing the nature and extent of ground disturbance in the easement. To determine whether construction activities proposed within the easement could affect cultural resources, staff needs to

clarify whether this easement has been surveyed for cultural resources within the past five years and what is the nature and extent of the ground disturbance in the easement.

DATA REQUESTS

60. Please provide the personnel names and qualifications, methods, and findings for the cultural resources survey of the entire north-south length of the 300-foot-wide SDG&E utility easement, within which the natural gas pipeline for the SBRP would be installed. If this easement has not been surveyed for cultural resources within the past five years, please complete the required survey and provide personnel names and qualifications, methods, and findings.
61. Please provide a discussion of the nature and extent of ground disturbance in the 300-foot-wide existing SDG&E utility easement.

BACKGROUND

The AFC does not provide location information on the route of the natural gas supply pipeline from the metering station to the two combustion turbines. Staff needs this information to identify all ground-disturbing project activities and assess their potential to impact buried cultural resources.

DATA REQUEST

62. Please provide a map showing the route of the natural gas supply pipeline from the metering station to the two combustion turbines and indicate the required trench depth of this line.

BACKGROUND

In its review of applicable laws, ordinances, regulations, and standards regarding cultural resources, the AFC indicates that San Diego County has an ordinance (San Diego County Administrative Code, §396.7), which establishes a San Diego County Local Register of Historical Resources. The AFC does not indicate that, during routine archival research to identify cultural resources in the project area, this local register was checked.

DATA REQUEST

63. Please check the San Diego County Local Register of Historical Resources for any listings located within one mile of the proposed project and provide the results.

BACKGROUND

The April, 2006, Geotechnical Foundation Analysis for the proposed SBRP (Appendix 8.15A) reports that there may be five to ten feet of surface fill material on the site, and that the potential of this material for liquefaction and for excessive settlement indicates

that shallow foundations are not feasible for heavily loaded and settlement-sensitive structures. The earlier report of Black and Veatch to Duke Energy recommended that fill material at the LNG site be removed and replaced with structured and compacted fill because of these stability issues (Appendix 8.15A, July 27, 2005). The AFC does not indicate whether this would be done. Nor does it identify any off-site disposal or borrow areas, if the removal and replacement would be done. To identify all impacts of the proposed project, staff needs to know if fill removal is planned and if the chosen soil disposal and borrow sites have been surveyed for cultural resources.

DATA REQUESTS

64. If surface fill material will be removed from the LNG site, please identify where this removal would be done, and how deep the fill removal would go in each location targeted for fill removal.

65. If removed fill material will be disposed of off-site and/or new fill soils brought in, please provide reports of the dates, personnel, methods, and findings from any cultural resources surveys of the disposal and borrow sites, or explain why no surveys are needed. If disposal and borrow sites are not commercial operations and consequently have not been surveyed for cultural resources, please conduct such surveys and provide the personnel qualifications, methods, and findings.

BACKGROUND

The Herbert and Walters historical architectural study of the extant SBPP briefly discusses the former SDG&E LNG storage facility to the south, on the site where the applicant proposes to build the new SBRP. The study indicates that the LNG facility was completed in 1965, was the only such facility in the west, and was one of only five in the world at the time (AFC Appendix 8.3C, pp. 9, 13). The age and the distinction of the LNG facility indicate that it must be considered a cultural resource potentially eligible for the California Register of Historical Resources (CRHR) under Criterion A and possibly under Criterion C, as well. To ensure that staff has a complete inventory of significant cultural resources which could be significantly impacted by the proposed SBRP, the remains of the LNG facility must be recorded and evaluated.

DATA REQUEST

66. Please record the remains of the LNG facility (foundations, roads and all other paved areas, tanks pads, and berms) as a historical archaeological site on DPR 523 forms, and provide a copy to both staff and the California Historical Resources Information System (CHRIS). Also, please have the former facility researched and evaluated for eligibility for the CRHR by a historian knowledgeable in the field of energy technology development and incorporate his or her report of the facility's historical context and significance into the DPR 523 forms.

BACKGROUND

The information from the CHRIS, which the applicant provided under confidential cover to staff, included site forms for six known resources and bibliographic data on fifteen cultural resources surveys which the CHRIS identified as having been conducted within the one-mile-radius literature review study area for the SBRP. The AFC states that these reports were reviewed for information pertinent to the SBRP (p. 8.3-10), but the findings of these reports are not included in the AFC, and the only archaeological report that is discussed in the AFC (Eckhardt and Carrico 1978, on p. 8.3-10) is not one of the fifteen reports the CHRIS listed. The cultural resources inventory in the AFC includes only the six properties for which the CHRIS provided site forms, two of which are sites possibly detailed in two of the fifteen CHRIS-listed surveys. The keywords assigned by the CHRIS to the fifteen listed reports suggest that these surveys identified a number of other sites in the one-mile-radius study area. Staff needs to review the fifteen CHRIS-listed reports and the Eckhardt and Carrico report in order to ensure that a complete inventory of cultural resources in the vicinity of the SBRP is compiled and that all resources are evaluated for significance and potential project impacts.

DATA REQUEST

67. Please provide to staff copies of the fifteen cultural resources reports listed in AFC Table 8.3-2, and a copy of the Eckhardt and Carrico (1978) report cited on AFC p. 8.3-10.

BACKGROUND

The CHRIS also provided a Geofinder map and data print-out of properties within the proposed project's 1-mile-radius study area that are listed on the National Register of Historic Places, on the CRHR, among California State Landmarks, among California Points of Historic Interest, or on other historic property lists. Only one property was shown on the Geofinder map, and only the property's address—1196 Industrial Blvd.—and its primary number—P-37-017656—were provided in the data print-out. This property is listed as one of the keywords for the Dolan (1999) survey report cited in AFC Table 8.3-2, but the report does not provide any detailed information. Staff needs more information on this property to assess its significance and to assess the proposed project's impacts on it.

DATA REQUEST

68. Please provide to staff copies of all CHRIS records regarding this resource, including its primary DPR 523 form and whatever forms resulted in the resource being listed on some historic property list. If this resource has not been evaluated for eligibility for the CRHR by a qualified architectural historian, please have such a specialist update the primary DPR 523 record for this resource, complete the evaluation section of the 523B form, assess the potential impact of the proposed SBRP on this resource, and provide copies of the forms and impact assessment to staff and copies of the forms to the CHRIS.

BACKGROUND

The applicant contacted 17 Native American individuals and groups seeking information on traditional cultural properties and archaeological sites. The AFC includes the responses of those Native Americans up through May 6, 2006. The applicant also contacted four local historical societies seeking information on local historic resources, but received no responses by the time the AFC was submitted to the Energy Commission. Staff needs to know if the applicant has received any additional responses from Native Americans or historical societies since that time.

DATA REQUESTS

69. Please provide copies of any communications with Native Americans regarding the SBRP received since May 6, 2006.
70. Please provide copies of any communications with local historical societies since the AFC was submitted to the Energy Commission.

South Bay Replacement Project (06-AFC-3)
Data Request

Technical Area: Hazardous Materials Management
Author: Alvin Greenberg

BACKGROUND

Aqueous ammonia will be used in the Selective Catalytic Reduction (SCR) process to control oxides of nitrogen. The AFC does not clearly state the frequency of aqueous ammonia deliveries, as page 8.12-10 of the Hazmat section states that there would be 1-2 trucks per week while table 8.10-6 of the Traffic section states that there would be 1-2 trucks per month. Also, the size (capacity) of the delivery trucks is not stated. Additionally, optional hazmat transport routes are given, but it is stated that the exact route will be specified once the shipper contacts the California Highway Patrol (CHP) and applies for a license.

Staff needs more specific information on the frequency of delivery, the capacity of the delivery tanker, and the preferred route(s) from the supplier to the facility in order to evaluate potential impacts at intersections in the vicinity of the site.

DATA REQUESTS

71. Please provide the following information regarding the transportation of aqueous ammonia:
    a. the frequency of aqueous ammonia deliveries on a per week, per month, and per year basis;
    b. the size (capacity) of the delivery trucks; and
    c. the specific highways and streets on the preferred route(s) from the supplier to the facility.

Technical Section: Land Use
Author: Amanda Stennick

BACKGROUND

As stated in the AFC, the SBRP site is within the planning area of the Chula Vista Bay Master Plan (CVBMP). The CVBMP planning process was initiated in January 2003 and is a joint planning effort of the San Diego Unified Port District (Port), City of Chula Vista/Redevelopment Agency of the City of Chula Vista, and Pacifica Companies. Land use planning responsibility for the master plan area is divided between the Port and City. The Port is the lead agency for CEQA review of this planning effort and the City is a responsible agency. The CVBMP will guide the development of the bay front over a 20-year period. The mix of proposed land uses includes parkland, open space, environmental buffers, civic/cultural, hotel, office, residential, retail and entertainment, and recreational uses. The Draft Environmental Impact Report (DEIR) on the CVBMP was released for public review in October 2006.

As stated in the DEIR, implementation of the CVBMP will require discretionary actions by the Board of Port Commissioners, Chula Vista City Council and Redevelopment Agency, and other agencies. Such discretionary actions include: amendments to the Port Master Plan, City of Chula Vista General Plan, and City Local Coastal Program (including the Local Coastal Plan and Specific Plan); coastal development permits; a land exchange; a financial participation agreement between the Port and the City and other types of related agreements; associated development permits; and State/Federal permits and actions/approvals.

DATA REQUEST

72. To help staff determine whether the CVBMP will be adopted prior to staff's Final Staff Assessment, please provide a timeline of expected actions for each local, state, and federal agency involved in the CVBMP. Please list each agency (e.g. Coastal Commission), state the action(s) they will take to implement the CVBMP, the expected time frame for all discretionary actions, and how the agency's action will be relevant to the SBRP project.

BACKGROUND

The Chula Vista Local Coastal Program (LCP) provides a detailed plan for the orderly growth, development, redevelopment, and conservation of the Chula Vista Local Coastal Zone. As such, the LCP must be consistent with local and state land use policies.

73. Please provide a discussion of how the SBRP would comply with the Chula Vista Local Coastal Plan (LCP).
74. If the CVBMP is not adopted prior to the completion of the Energy Commission's licensing process for the SBRP, please state which land use plan(s) would be

applicable to the SBRP site. Please expand on the discussion in the AFC's Land Use detailing how the SBRP would comply with all relevant land use plans and policies.

BACKGROUND

Section 30260 of the Coastal Act provides guidelines for the development of new or expansion of existing coastal dependent industrial facilities. There is no discussion in the SBRP AFC on this section of the Coastal Act.

DATA REQUEST

75. Please describe how the proposed project conforms to Section 30260 of the Coastal Act as it pertains to coastal dependent industry and the location or expansion of industrial development.

Technical Area: Public Health
Author: Alvin Greenberg

BACKGROUND

The AFC states that the Hot Spots Analysis and Response Model (HARP) model is used to assess cancer risk and chronic and acute impacts. In the opinion of staff, this is only partially true. The HARP model was used to derive potential cancer risk values for each pollutant and route of exposure, based on an exposure of 1.0 ug/m^3. These unit values were then combined with pollutant emission rates, and these weighted values were used in the AERMOD model to obtain actual cancer risks and hazard indices.

The AFC states: "AERMOD replaces the previously EPA-recommended model, Industrial Source Complex, Version 3 (ISC3), which has been used for many years for air quality impact analyses in CEC AFCs."

Staff needs certain data in order to independently confirm the Health Risk Assessment (HRA) results as found in the AFC.

DATA REQUESTS

76. Please provide the HARP transaction file (.tra) and/or the following information that was used in the HARP modeling:
    - Stack parameters and locations in UTM coordinates
    - Information on project buildings and tanks used in building downwash analysis (locations in UTM coordinates and dimensions)
    - Meteorological data used

BACKGROUND

A map of the Maximum Exposed Individuals (MEIs) is provided, with Universal Transverse Mercator (UTM) coordinates, but the distances from the project site are not given. Staff needs these distances to complete its analysis of impacts.

DATA REQUESTS

77. provide a table showing distances from the combustion turbine stacks to various receptors including the fence line, the cancer risk MEI, the acute hazard MEI, the chronic hazard MEI, the Points of Maximum Impact for cancer risk and acute & chronic hazards, and a few representative nearest sensitive receptors.

Technical Area: Socioeconomics
Author: Joseph Diamond Ph. D.

BACKGROUND

Staff needs to verify that the time value of money used for all SBRP economic estimates including the IMPLAN economic impacts analysis was based on 2006 dollars.

DATA REQUEST

78. Please indicate the year for all economic estimates.

BACKGROUND

Cumulative impact analysis is part of the socioeconomic section. Staff needs to understand the potential cumulative impacts from demolition of the 69-138 kV substation.

DATA REQUEST

79. Please provide the following information related to the demolition of the existing 69-138 kV substation:
    a. Estimate beginning and ending dates of the demolition work.
    b. Estimate monthly average and peak month's construction workforce.
    c. Estimate percentage of the construction workforce that will be local, from San Diego County, and non-local.

BACKGROUND

There are a few economic numbers in the Socioeconomics section of the AFC which need to be clarified in order to improve staff's understanding of the project's effects.

DATA REQUEST

80. Please provide the following socioeconomic information:
    d. In Socioeconomics p.8.8-28, paragraph 1, lines 1-3, please confirm that -22, or alternatively -49, is the correct induced employment number to use to yield a SAM employment multiplier of 1.9.
    e. Note Socioeconomics 8.8-29, paragraph 5. Please show all your assumptions and calculations used to estimate the SBRP lease payments to the San Diego Port Authority. Also include how many years for the estimated annual lease payments of $800,742.

Technical Area: Traffic and Transportation
Author: James Adams

BACKGROUND

Staff relies on information in the AFC to assess the existing traffic and transportation system near the proposed power plant site and to analyze the impacts from project construction, demolition, and operation. Two pieces of information were not provided in the Traffic and Transportation section of the AFC.

DATA REQUEST

81. Please provide an estimated percentage of current traffic flow for trucks.

82. Identify any road features that may affect public safety.

South Bay Replacement Project (06-AFC-3)
Data Request

Technical Area: Transmission System Engineering
Authors: Laiping Ng
Technical Senior: Mark Hesters

BACKGROUND

The California Environmental Quality Act (CEQA) requires the identification and description of the direct and indirect significant effects of the project on the environment. The information requirements for the AFC require discussion of the "energy resource impacts which may result from the construction or operation of the power plant." For the identification of impacts on the transmission system resources and the indirect or downstream transmission impacts, staff relies on the System Impact and Facilities Studies as well as review of these studies by the agency responsible for insuring the interconnecting grid meets reliability standards, in this case, the California Independent System Operator (CAISO).

Without a complete System Impact or Facility study, staff is not able to fulfill the CEQA requirement to identify the indirect effects of the proposed project. These studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards. When the studies determine that the project will cause a violation of reliability standards, the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include the construction of downstream transmission facilities. CEQA requires the analysis of any downstream facilities for potential indirect impacts of the proposed project.

Page 13 and 14 of the Interconnection Facilities Study (IFS), dated July 31, 2006, under the Power Flow Results, states that the South Bay Replacement Project (SBRP) causes overloads under Category B contingencies. The IFS also indicates that overloads appear before the addition of the SBRP and the overloads marginally increase due to the proposed SBRP. The IFS has not proposed capital improvement projects for the mitigation of the overloads.

Staff needs additional documentation and information regarding the IFS and the proposed mitigation measures in order to complete its analysis.

DATA REQUEST

83. Indicate the location and the Capacitor Bank ratings which are used to reduce the overloads of the Sycamore Canyon bank 70, 230/69 kV transformer.
84. If a Special Protection System (SPS) is used to mitigate the Sycamore Canyon-Miguel Tap 230 kV line overload, explain whether the SPS is existing or new for the SDG&E system. If the SPS is new, then explain who would be responsible for the capital costs.
85. The Eastgate-Rose Canyon 69 kV line is overloaded by 2.1% under Category B contingency. On page 14, the IFS states: "The dispatch in this case is not typical of how the system would be operated..." and "This line is only rated at 50.3 MVA and

will likely be a future grid assessment project". Please explain how the system would be operated in order to avoid the overload. Provide detailed information on how the line would be upgraded, the schedule of the upgrades, and who would be responsible for the capital costs.

86. The Sycamore Canyon-Carlton Hills Tap 138 kV line exceeds its emergency rating by 8.9%. Please explain the mitigation proposed for the overload and identify the parties who would be responsible for the upgrades.

87. The Thermal Analysis: MVA2 Excel table (no page number) listed eight alternatives and pre and post project impacts for each alternative. Alternative 8 seemed to be the worse case scenario. Please clarify which alternative would be the relevant scenario for the determination of overloads and identification of mitigation. If the overloads will be addressed by other studies or will be mitigated by the SBRP, please be specific on how and when an upgrade, if any, will take place.

88. The IFS states that the Category C contingency study was performed. The Category C contingency was listed in the other "Thermal Analysis: MVA2" table (no page number). Please provide mitigation proposed for the overloads identified under Category C contingencies and identify the parties who would be responsible.

South Bay Replacement Project (06-AFC-3)
Data Request

Technical Area: Waste Management
Author: Michael Stephens

BACKGROUND

Phase I and Phase II environmental investigations were conducted at the existing South Bay Power Plant facility South Bay Power Plant site in 1998. An additional Phase I investigation was conducted in 2005 that included both the LNG and the South Bay Power Plant facilities. The investigations identified significant environmental issues including soil and groundwater contamination at the South Bay Power Plant, with additional investigation work recommended for the LNG site. A Workplan was completed in June 2005 in response to a request by DTSC to further characterize the South Bay Power Plant. The Workplan presents proposed soil and groundwater investigation and remediation activities at the existing plant site; as well as a summary of contamination assessment data that had been previously obtained at the site. It is uncertain what, if any, additional investigation and remediation activities have actually been conducted since the Workplan was prepared. The Workplan identifies numerous Solid Waste Management Units and Areas of Concern at the existing facility, which may also be found at the South Bay Replacement Project project site. The main concerns appear to be petroleum hydrocarbons and metals in soils, and petroleum hydrocarbons and low level Volatile Organic Compounds (VOC's) in groundwater. Risk(s) to human health and the environment have not been quantified.

The AFC states that DTSC is the lead agency conducting oversight of investigation and remediation activities for the existing facility. Agencies normally enter into an oversight agreement with parties responsible for investigation and cleanup activities in a particular area. No oversight agreement between the applicant and DTSC was presented in the AFC.

DATA REQUEST

89. A comprehensive human health risk assessment should be conducted that includes possible exposure pathways to construction workers, facility personnel, and the public. Please provide a human health risk assessment for the South Bay Replacement Project (SBRP) site.

90. An ecological risk assessment should be conducted that includes an assessment of the potential risk to aquatic life in the bay. Please provide an ecological risk assessment for the SBRP site.

91. Please provide information on investigation and remediation activities that have occurred since the 2005 Workplan was presented to DTSC; as well as those activities that are planned. Please discuss the Workplan's applicability to the SBRP site, if any. If the 2005 Workplan is not applicable to the SBRP Site, please provide a Workplan Addendum, or a separate workplan, identifying proposed activities. Please provide a schedule for these planned activities; if any.

92. Please provide a copy of a signed oversight agreement with DTSC for investigation and cleanup of the Site.

Technical Area: Worker Safety/Fire Prevention
Author: Alvin Greenberg

BACKGROUND

Section 2.3.9.4 of the AFC describes the fire prevention, suppression, and response systems for the proposed power plant during the Operational Phase. These include fixed water and CO_2 systems as well as portable systems. Section 8.7.3.4 describes the off-site fire response available and section 8.7 includes a brief discussion of the fire training programs. However, the AFC does not describe the fire prevention, suppression, and response systems that would be on-site during the Construction Phase and during the Demolition Phase.

Staff needs more specific information on the fire prevention and response plans, including HazMat spill response and Emergency Medical Services (EMS) response during the Construction and Demolition Phases.

DATA REQUESTS

93. Please provide specific information on the fire prevention and response methods planned for the Construction Phase and for the Demolition Phase.
94. Please provide a brief summary of the planned EMS and HazMat spill response capability for the Construction and Demolition Phases.

SOUTH BAY REPLACEMENT PROJECT
(06-AFC-03)
DATA REQUESTS

Technical Area: Visual Resources
Author: David Flores

BACKGROUND

Staff relies on information in the Application for Certification (AFC) to assess the existing visual setting near the proposed power plant site. The following information is necessary for staff to evaluate the proposed project's impact on the area viewshed.

DATA REQUEST

95. Please provide information on the frequency, size and time of the year when visible plumes have typically been observed from the existing South Bay power plant. Preferably, this information should be obtained from public officials (i.e. port officials) who work in the nearby area.

SOUTH BAY REPLACEMENT PROJECT
(06-AFC-03)
DATA REQUESTS

Technical Area: Soil and Water Resources
Author: Richard Latteri

BACKGROUND

State Water Code Section 13551 finds the use of potable water for industrial and irrigation uses is a waste or an unreasonable use of potable water within the meaning of Section 2 of Article X of the California Constitution if recycled water is available. Conservation of raw and potable water is encouraged in the San Diego Bay area as 90 percent of the region's water is imported from the Colorado River.

The SBRP proposes to use potable water for all construction, operation and demolition activities as outlined in Table 8.14-2 of the AFC. Sweetwater Authority, via a "Will-Serve" letter dated April 19, 2006, has committed to supplying up to 1,200 gallons per minute (maximum annual usage of 129 AFY) for all construction/demolition and operation activities of the SBRP. Additional information on the estimated amount of potable water consumption and its availability is required for staff to conduct a complete analysis of potential impacts to water resources.

DATA REQUEST

96. Please provide an itemized estimate in tabular format of total water consumption for plant and switchyard construction, equipment wash water, hydrostatic testing of all pipelines, SBRP operation, landscape irrigation, and demolition of the SBPP and switchyard. Please provide the estimate in gallons and gallons per day and/or acre-feet per year.
97. Please provide the rationale and economic justification for not using tertiary treated recycled water for those activities (construction/demolition dust control and soil compaction, hydrostatic testing, landscape irrigation, and steam supply/equipment wash water).
98. Please provide an economic analysis comparing the use of potable water versus tertiary treated recycled water over a 35 year period that encompasses both the construction/demolition and operation phases of the SBRP. In the analysis, please use tertiary treated recycled water supplied from the South Bay Water Reclamation Plant's distribution system for all purposes except drinking/sanitation water, potable waterline hydrostatic testing and fire suppression.

BACKGROUND

The SBRP will be required to complete and implement a Storm Water Pollution Prevention Plan (SWPPP) that complies with SWRCB Order No. 99-08-DWQ for discharges associated with construction activities as well as a Standard Urban Stormwater Mitigation Plan that complies with both the San Diego Regional Water Quality Control Board (SDRWQCB) Order No. 2001-01 and Article 10 of the San Diego Unified Port District Code. Additionally, the Energy Commission will require a Drainage Erosion and Sediment Control Plan (DESCP).

99. The DESCP is to be a separate document which will be updated and revised as the project moves from the preliminary to final design phases. While Appendix 8.14A of the AFC contains several erosion/sediment control Best Management Practices (BMPs) and water pollution control drawings, these will need to be aggregated into a draft DESCP.

DATA REQUEST

100. Please provide a draft DESCP containing elements A through I below outlining site management activities and erosion/sediment control BMPs to be implemented during site mobilization, excavation/demolition, construction, and post-construction activities. Within the draft DESCP, please provide a discussion of those additional requirements of SDRWQCB Order No. 2001-01 and Article 10 of the San Diego Unified Port District Code for the handling and disposal of demolition/contaminated materials as they relate to soils and erosion control. The level of detail in the draft DESCP shall be commensurate with the current level of planning for site demolition and corresponding site grading and drainage. The DESCP submitted prior to site mobilization must be designed and sealed by a professional engineer/erosion control specialist. Please provide all conceptual erosion control information for those phases of construction and post-construction that have been developed or provide a statement when such information will be available.

A. **Vicinity Map** – A map(s) at a minimum scale 1"=100' will be provided indicating the location of all project elements with depictions of all significant geographic features including swales, storm drains, and sensitive areas.

B. **Site Delineation** – All areas subject to soil disturbance for the SBRP (project site, lay down/demolition areas, all linear facilities, landscaping areas, and any other project elements) shall be delineated showing boundary lines of all construction/demolition areas and the location of all existing and proposed structures, pipelines, roads, and drainage facilities.

C. **Watercourses and Critical Areas** – The DESCP shall show the location of all nearby watercourses including swales, storm drains, and drainage ditches. Indicate the proximity of those features to the SBRP construction, lay down/demolition, and landscape areas and all transmission and pipeline construction corridors.

D. **Drainage Map** – The DESCP shall provide a topographic site map(s) at a minimum scale 1"=100' showing all existing, interim and proposed drainage systems and drainage area boundaries. On the map, spot elevations are required where relatively flat conditions exist. The spot elevations and contours shall be extended off-site for a minimum distance of 100 feet in flat terrain.

E. **Drainage of Project Site Narrative** – The DESCP shall include a narrative of the drainage measures to be taken to protect the site and downstream facilities. The narrative should include the summary pages from the hydraulic analysis prepared by a professional engineer/erosion control specialist. The narrative shall state the watershed size(s) in acres that was used in the calculation of drainage measures. The hydraulic analysis should be used to support the selection of BMPs and structural controls to divert off-site and on-site drainage around or through the SBRP construction and laydown/demolition areas.

F. **Clearing and Grading Plans** – The DESCP shall provide a delineation of all areas to be cleared of vegetation and areas to be preserved. The plan shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections or other means. The locations of any disposal areas, fills, or other special features will also be shown. Illustrate existing and proposed topography tying in proposed contours with existing topography.

G. **Clearing and Grading Narrative** – The DESCP shall include a table with the quantities of material excavated or filled for the site and all project elements of the SBRP (project site, lay down/demolition areas, transmission corridors, and pipeline corridors) to include those materials removed from the site due to demolition, whether such excavations or fill is temporary or permanent, and the amount of such material to be imported or exported. The table shall distinguish whether such excavations or fill is temporary or permanent and the amount of material to be imported or exported.

H. **Best Management Practices Plan** – The DESCP shall identify on the topographic site map(s) the location of the site specific BMPs to be employed during each phase of construction (initial grading/demolition, project element excavation and construction, and final grading/stabilization). BMPs shall include measures designed to prevent wind and water erosion in areas with existing soil contamination. Treatment control BMPs used during construction should enable testing of groundwater and/or stormwater runoff prior to discharge to San Diego Bay.

I. **Best Management Practices Narrative** – The DESCP shall show the location (as identified in H above), timing, and maintenance schedule of all erosion and sediment control BMPs to be used prior to initial grading/demolition, during project element excavation and construction, final grading/stabilization, and post-construction. Separate BMP implementation schedules shall be provided for each project element for each phase of construction. The maintenance schedule should include post-construction maintenance of structural control BMPs, or a statement provided when such information will be available.

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SOUTH BAY REPLACEMENT PROJECT
APPLICATION FOR CERTIFICATION
DOCKET NO. 06-AFC-3

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