

Memorandum

Date : September 11, 2006

Telephone: (916) 654-4996

To: Jackalyne Pfannenstiel, Chairman
James D. Boyd, Vice Chair
Arthur H. Rosenfeld, Ph.D., Commissioner
John L. Geesman, Commissioner
Jeffery Byron, Commissioner

DOCKET
06-AFC-4

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From: **California Energy Commission** **B. B. Blevins**
1516 Ninth Street **Executive Director**
Sacramento, CA 95814-5512

Subject: **VERNON POWER PLANT PROJECT**
SECOND DATA ADEQUACY RECOMMENDATION (06-AFC-4)

The staff has completed its data adequacy review of the Vernon Power Plant Project Application for Certification (AFC) Supplements A and B submitted on August 25, and September 8, 2006. Staff has determined that the AFC and Supplements contain all the information required by California Code of Regulations, Title 20, Section 1704, including Appendix B, for the 12-month AFC process.

Attachment A contains an overview of each technical discipline evaluated. Attachment B contains detailed data adequacy worksheets that describe staff's findings for each information requirement for the 12-month AFC process.

We have received comments from other agencies. The South Coast Air Quality Management District has indicated that the Air Permit Application is complete as of July 28, 2006. The Los Angeles County Department of Public Works, Watershed Management Division and the Los Angeles Department of Water and Power have both raised concerns regarding the applicant's transmission line route options. CalTrans also expressed concerns related to the proposed transmission line crossing of Interstate 710. Finally the Southern California Association of Governments submitted a "No Comments" letter.

At the Energy Commission's business meeting on September 14, 2006, staff will recommend that the Energy Commission accept the AFC.

If you have any questions, please call James W. Reede, Jr., staff's Project Manager, at (916) 653-1245.

Attachments

**ATTACHMENT A
OVERVIEW OF ENERGY COMMISSION STAFF'S
DATA ADEQUACY DETERMINATION
VERNON POWER PLANT PROJECT
06-AFC-4**

TECHNICAL AREA	ATTACHMENT B PAGE No.	ADEQUATE? 12-MONTH
Air Quality	1	Yes
Cultural Resources	8	Yes
Project Description	12	Yes
Transmission System Eng.	15	Yes
Visual Resources	19	Yes
Waste Management	22	Yes

ATTACHMENT B

**ENERGY COMMISSION STAFF'S
List of Data Adequacies**

**Vernon Power Plant Project
06-AFC-4**

September 8, 2006

Adequacy Issue: Adequate Inadequate

DATA ADEQUACY WORKSHEET

Revision No. 01 Date September 8, 2006

Technical Area: Air Quality

Project: Vernon Power Plant Project

Technical Staff: Joe Loyer

Project Manager: James Reede

Docket: 06-AFC-03

Technical Senior: Keith Golden

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Section 8.1, Pages 8.1-60 & 61 Appendix 8.1E, Page 8.1E-3 Supplement B, September 8, 2006	No Yes	Please identify specific locations and quantity of emission reduction credits (ERCs) that are earmarked for this project (as requested under Appendix B (g)(8)(J)(iii)).
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	Application submitted to South Coast Air Quality Management District (SCAQMD), June 30, 2006. SCAQMD letter of July 28, 2006	No Yes	SCAQMD informed staff that they will respond within 30 days with a written letter regarding their determination of whether the project application is sufficient for them to complete their Determination of Compliance.
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	Section 2.2.6, page 2-7 Table 8.1-17 & -18, page 8.1-33 Table 8.1C.4a Appendix 8.1C Section 10.3-4, page 10-2 & 3	Yes	
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Section 2.2.11, page 2-13 & 14	Yes	
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	Section 2.2.8, page 2-10 & 11 Table 8.1B.6c	Yes	
Appendix B (g) (8) (E)	The emission rates of criteria pollutants from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all secondary emission sources.	Appendix 8.1B et al Section 8.1.6.1.1 through 3, page 8.1-29 through 35	Yes	

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (8) (F)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	Appendix 8.1B et al Section 8.1.6.1.1 through 3, page 8.1-29 through 35	Yes	
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	Section 8.1.4, page 8.1-5 though 12	Yes	
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Section 8.1.6.2.1, page 8.1-39 Files on DVD	Yes	
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995), which is incorporated by reference in its entirety.)	NA	NA	
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Figures 8.1-1a through 1i Table 8.1C.5a through 5e Files on DVD Section 8.1.2.2, page 8.1-2 & 3	Yes	
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of the following:			

Adequacy Issue: Adequate Inadequate
 Technical Area: Air Quality
 Project Manager: James Reede

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Revision No. 01 Date September 8, 2006
 Technical Staff: Joe Loyer
 Technical Senior: Keith Golden

Project: Vernon Power Plant Project
 Docket: 06-AFC-03

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct inert pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM ₁₀) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO _x), sulfur dioxide (SO ₂), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM ₁₀)] from construction-related equipment;	Appendix 8.1A et al	Yes	
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct inert criteria pollutant (NO _x , SO ₂ , CO and PM ₁₀) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions; and	Table 8.1C.3a, 3b, 4a & 4b	Yes	
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a six mile radius which have received construction permits but are not yet operational, or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard.	Section 8.1.8, page 8.1-63 Appendix 8.1E	Yes	
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under subsection (g)(1), provide the following information:	NA	NA	
Appendix B (g) (8) (J) (i)	The quantity of offsets needed;	Table 8.1E-1, page 8.1E-3	Yes	

Adequacy Issue: Adequate Inadequate

DATA ADEQUACY WORKSHEET

Revision No. 01 Date September 8, 2006

Technical Area: **Air Quality**

Project: Vernon Power Plant Project

Technical Staff: Joe Loyer

Project Manager: James Reede

Docket: 06-AFC-03

Technical Senior: Keith Golden

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions; and	Table 8.1E-3, page 8.1E-4 Supplement A, August 25, 2006	No Yes	Please provide a list of offset holders you have entered into negotiations with to supplement those already provided in Table 8.1E-3. Provide this list of the ERCs necessary for VOC, CO, PM10 and SO2 emissions and Reclaim Trading Credits necessary for NOx. You may submit this information to the CEC with a request for confidential status.
Appendix B (g) (8) (J) (iii)	Method of emission reduction.		Yes	.
Appendix B (g) (8) (K)	A topographic map containing contour and elevation data, at a scale of 1:24,000, showing the area within 6 miles of the power plant site.	Quad maps provided	Yes	
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	Table 8.1-12, page 8.1-24 through 28	Yes	
Appendix B (h) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Table 8.1-10, page 8.1-13	Yes	
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	Section 8.1.7, page 8.1-55 through 63	Yes	
Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.	Table 8.1-10, page 8.1-13	Yes	

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Project: Vernon Power Plant Project
 Docket: 06-AFC-03

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (4)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Table 8.1-12, page 8.1-24 through 28	Yes	

Adequacy Issue: Adequate Inadequate
 Technical Area: Cultural Resources
 Project Manager: James Reede

DATA ADEQUACY WORKSHEET

Revision No. 01 Date August 8, 2006
 Technical Staff: Beverly E. Bastian
 Technical Senior: Rick York

Project: Vernon Power Plant
 Docket: 06-AFC-4

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	<p>existing site conditions: Vol. 1, p. 1-7, §1.7.3; pp. 8.3-4 to 8.3-5, §8.3.3.1</p> <p>impacts: Vol. 1, p. 8.3-17 to 8.3-18, §8.3.4 & §8.3.5</p> <p>mitigation measures: Not/Applicable (no known cult. res., no adverse effects, no mitigation)</p> <p>mitigation effectiveness: Not/Applicable (no known cult. res., no adverse effects, no mitigation)</p> <p>monitoring plans Not/Applicable (no known cult. res., no adverse effects, no mitigation)</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	
Appendix B (g) (2) (A)	A brief summary of the ethnology, prehistory, and history of the region in which the project site and related facilities are located and maps at a scale of 1:24,000, indicating areas of ethnographic occupation. The region may vary depending on the extent of the territory occupied or used by prehistoric cultures indigenous to the area in which the project is located.	<p>ethnology, prehistory, history summary: Vol. 1, pp. 8.3-5 to 8.3-9, §8.3.3.2, §8.3.3.3, §8.3.3.4</p> <p>maps: Vol. 1, Figure. 8.3-1</p>	<p>Yes</p> <p>Yes</p>	

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Appendix B (g) (2) (B)	A description of all literature searches and field surveys used to provide information about known cultural resources in the project vicinity. If survey records of the area potentially physically affected by the project are not available, and the area has the potential for containing significant cultural resources, the applicant shall submit a new or revised survey for any portion of the area lacking comprehensive survey data. A discussion of the dates of the surveys, methods used in completing the surveys, and the identification and qualification of the individuals conducting the surveys shall be included.	<p>literature search: Vol. 1, pp. 8.3-10 to 8.3-13, §8.3.3.5.1</p> <p>new surveys: Vol. 1, pp. 8.3-13 to 8.3-16, §8.3.3.5.2; <u>Supplement of August 28, 2006</u></p> <p>survey dates: Vol. 1, p. 8.3-13, §8.3.3.5.2</p> <p>survey methods: Vol. 1, pp. 8.3-10; 8.3-14, §8.3.3.5 & §8.3.3.5.2</p> <p>resumes of those conducting surveys: Vol. 1, p. 8.3-13, §8.3.3.5.2; App. 8.3B</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>It is our understanding that a historical architectural survey is currently being conducted, so the report of this survey was not included in the AFC. Separate submission of this report is needed.</p>
Appendix B (g) (2) (C)	A discussion of the sensitivity of the project area described in subsection (g)(2)(A) and the presence and significance of any known archeological sites and other cultural resources that may be affected by the project. Information on the specific location of archeological resources shall be included in a separate appendix to the application and submitted to the Commission under a request for confidentiality pursuant to Title 20, California Code of Regulations, § 2501 et seq.	<p>project area sensitivity: Vol. 1, p. 1-7, §1.7.3</p> <p>site presence: Vol. 1, p. 8.3-17, §8.3.4</p> <p>confidential filing: Vol. 2, App. 8.3C</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	
Appendix B (g) (2) (D)	A summary of contacts and communications with, and responses from, Native American representatives who may have an interest in heritage lands and/or resources potentially affected by the proposed project.	summary of Native American contacts: Vol. 1, p. 8.3-17, §8.3.3.5.3; App. 8.3A	Yes	

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Appendix B (g) (2) (E)	In the discussion on mitigation and monitoring prepared pursuant to subsection (g)(1), a discussion of any educational programs proposed to enhance awareness of potential impacts to archeological resources by employees and contractors, measures proposed for mitigation of impacts to known cultural resources, and a set of contingency measures for mitigation of potential impacts to previously unknown cultural resources.	mitigation: Not/Applicable (no known cult. res., no adverse effects, no mitigation) worker training: Vol. 1, p. 8.3-18, §8.3.6.2 mitigation for known resources: Not/Applicable (no known cult. res., no adverse effects, no mitigation) contingency mitigation: Vol. 1, pp. 8.3-18 to 8.3-20, §8.3.6	Yes Yes Yes Yes	
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	table of LORS: Vol. 1, Table 8.3-1 discussion of LORS: Vol. 1, pp. 8.3-3 to 8.3-4, §8.3.2.1	Yes Yes	
Appendix B (h) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	table of agencies: Vol. 1, Table 8.3-4 table of agencies: Vol. 1, Table 8.3-4	Yes Yes	
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	LORS conformity: Vol. 1, Table 8.3-1	Yes	

Adequacy Issue: Adequate Inadequate
 Technical Area: Cultural Resources
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Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.	agency contacts: Vol. 1, Table 8.3-4	Yes	
Appendix B (h) (4)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	other permit schedule: Vol. 1, pp. 8.3-20 to 8.3-21, §8.3.8 steps to obtain permits: Vol. 1, pp. 8.3-20 to 8.3-21, §8.3.8	Yes Yes	

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DATA ADEQUACY WORKSHEET

Revision No. 01 Date September 8, 2006

Technical Area: Project Description

Project: Vernon Power Plant Project

Technical Staff: J. W. Reede

Project Manager: James W. Reede, Jr., Ed.D

Docket: 06-AFC-4

Technical Senior: E. Allen

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	All Sections	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	All Sections	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference	All Sections	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Appendix 1B	Yes	
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply, water supply, pollution control systems, and other general characteristics.	Section 2.0 Pages 2-1 through 2-26	Yes	
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county and assessors parcel numbers.	Section 1.3 Page 1-4	Yes	
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	Figures 1.2-1, 1.2-2 & 1.2-5	Yes	
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	Figures 1.2-6 & 1.2-7, Supplement A	Yes No	Please provide color photos of the existing site; see the Visual Resources section for an option which would suffice for both areas.

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Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities.	Appendix 1A	Yes	
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	Section 1.4, Page 1.2 and Section 2.2.15, Page 2-17	Yes	
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	Section 1.5, Page 1-5	Yes	
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	Section 1.6, Page 1.5 and Section 5 Pages 5-1 to 5-4	Yes	
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in subsections (a)(3)(A) and (B).	Section 1.6, Page 1.5 and Section 5, Pages 5-1 to 5-4	Yes	
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	Map Folio	Yes	
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities;	Figures 1.2-3 & 1.2-4	Yes	
Appendix B (b) (1) (C)	A detailed description of the design, construction and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	Section 2.0, Pages 2-0 through 2-26	Yes	

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s).	Map Folio	Yes	
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.	Figures 8.11-2	Yes	
Appendix B (c)	In a section entitled, "Demand Conformance" provide a discussion explaining how the proposed project conforms with the requirements of Public Resources Code § 25524 or Public Resources Code § 25540.6(a)(5). If the provisions of Public Resources Code § 25523.5 are applicable, explain how the project conforms with the requirements of this section. Additional data adequacy requirements may be contained in the Electricity Report applicable pursuant to Title 20, California Code of Regulations, § 1720.5.	Not Applicable		
Appendix B (d) (1)	A copy of any study or analysis required by the terms of the Commission's Final Decision on the NOI, and a brief summary of the results of the study or analysis.	Not Applicable		
Appendix B (d) (2)	Updates of any significant information which has changed since the Commission's Final Decision on the NOI.	Not Applicable		
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Section 4.0, Pages 4-1 to 4-3	Yes	

Adequacy Issue: Adequate Inadequate

DATA ADEQUACY WORKSHEET

Revision No. 01 Date September 8, 2006

Technical Area: Transmission System Eng.

Project: Vernon Power Plant

Technical Staff: Ajoy Guha, P.E.

Project Manager: James W. Reede, Jr.

Docket: 06-AFC-4

Technical Senior: Mark Hesters

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	Section 5.1, Pages 5-1 to 5-3. Section 5.2.1, Page 5-3.	Yes	
Appendix B (i) (2) (B)	A discussion of the extent to which the proposed electric transmission facilities have been designed, planned, and routed to meet the transmission requirements created by additional generating facilities planned by the applicant or any other entity.	Section 5.2.2, Pages 5-3 to 5-6. Figure 5.2-1. Figure 2.2-4. <u>Data Adequacy Response- Supplements A & B</u>	No-Yes	<ol style="list-style-type: none"> 1. Provide a complete electrical one-line diagram of VPP switchyard showing all equipment for generators' interconnection with the switchyard including any bus duct connectors, 15 kV switchgear, disconnect switches, generator step-up transformers, breakers and their respective ratings. 2. Identify and select the interconnecting 230 kV transmission line between VPP switchyard and Laguna Bell substation between the River Route and Randolph street Route transmission alternatives. 3. For expansion of Laguna Bell substation provide a description and the necessary drawings with termination breakers in an electrical one-line diagram

Adequacy Issue: Adequate Inadequate

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Revision No. 01 Date September 8, 2006

Technical Area: Transmission System Eng.

Project: Vernon Power Plant

Technical Staff: Ajoy Guha, P.E.

Project Manager: James W. Reede, Jr.

Docket: 06-AFC-4

Technical Senior: Mark Hesters

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators. This description shall include power load flow diagrams which demonstrate conformance or nonconformance with utility reliability and planning criteria at the time the facility is expected to be placed in operation and five years thereafter; and	<p>Section 5.4, Pages 5-9 to 5-10 Section 1.4, Page 1-4</p> <p>Transmission Interconnection System Impact Study, Appendix 5A & 5B</p> <p><u>Data Adequacy Response- Supplements A & B System Impact study</u></p>	<p>Yes No</p>	<p>The AFC is for 914 MW net generation output from the proposed Vernon Power Plant (VPP) with a target on-line date of third quarter of 2009. But two System Impact studies (SIS), one for 610 MW output and the other for 890 MW output (stated as incomplete study) were submitted to the Commission and the studies were conducted under 2008 system conditions instead of 2009 system conditions. In order to demonstrate conformance or non-conformance with the NERC/WSCC, California Independent System Operator (Cal-ISO) and/or Utility planning standards and reliability criteria, please submit a new System Impact study for the nominal 914 MW Vernon Power Plant (VPP) under 2009 summer peak and spring system conditions as follows:</p> <ol style="list-style-type: none"> List all major study assumptions in the base cases including imports and exports to the system, major Path flows (such as EOR, SCIT etc.), major generations including queue generation projects and hydro, loads in the area systems. Identify the reliability and planning criteria utilized to determine the reliability criteria violations in the area systems. For Power Flow analysis with each base case for N-0, N-1 and critical N-2 contingency conditions, provide a list of overload criteria violations in the SCE area and non-SCE areas. Identify the pre-project existing overloads, and post-project new overloads and incremental overloads. Provide a list of contingencies evaluated. Analyze system for Transient Stability conditions. Provide a list of contingencies studied (if available). Analyze system for Post-transient voltage conditions (such as Governor Power Flow). Provide a list of contingencies evaluated (if available). Analyze system for Short-Circuit duties for three and single-phase faults, and provide the results along with existing Breaker normal and fault interrupting ratings (if available). List all mitigation measures considered (required) and those selected (if available) for all criteria violations. Provide Power flow diagrams for all base cases with and without the VPP plant and also N-0, N-1 and N-2 cases where overloads and voltage violations occur. Provide electronic copies of *.sav and *.drw, *.dxd and *.swt GE PSLF files and EPCL contingency files in a CD (if available). 67 those selected (if available) for all criteria violations. Provide power flow diagrams (showing MVA, % loading & P.U. voltage) for Base Cases with and without the VPP project. Power flow diagrams must also be provided for

Adequacy Issue: Adequate Inadequate
 Technical Area: Transmission System Eng.
 Project Manager: James W. Reede, Jr.

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Revision No. 01 Date September 8, 2006
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 Technical Senior: Mark Hesters

Project: Vernon Power Plant
 Docket: 06-AFC-4

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints.	Section 5.2-2, Pages 5-3 to 5-6- Transmission Interconnection System Impact Study, Appendix 5A & 5B <u>Data Adequacy Response-Supplement A</u> <u>System Impact study</u>	No-Yes	For mitigation measures, if any, requiring downstream transmission line modifications, reconductoring or any new transmission line project, provide a full description with one line diagrams showing pre-project and post-project downstream facilities. For their environmental settings and impacts, provide routes and general environmental analysis and any recommended mitigation measures (Note: The System Impact Studies with identified mitigation measures must be completed first).
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	Section 5.2-1, Page 5-3	Yes	
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.		NA	
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.		NA	
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	Section 5.6, Page 5-23 to 5-26. Appendix 10D. Section 8.4.1, Pages 8.4-1 to 8.4-3.	Yes	

Adequacy Issue: Adequate Inadequate
 Technical Area: Transmission System Eng.
 Project Manager: James W. Reede, Jr.

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 Technical Staff: Ajoy Guha, P.E.
 Technical Senior: Mark Hesters

Project: Vernon Power Plant
 Docket: 06-AFC-4

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Section 8.4.8, Pages 8.4-15 to 8.4-17.	Yes	
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	Section 8.4, Pages 8.4-1 to 8.4 -9	Yes	
Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.	Section 10.5, Pages 10-4 to 10-5. Section 8.4, Pages 8.4-1 to 8.4-9.	Yes	
Appendix B (h) (4)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 10.7, Pages 10-5. <u>Data Adequacy Response- Supplement A</u>	No <u>Yes</u>	Inform when the CA ISO preliminary and final approvals will be obtained.

Adequacy Issue: Adequate Inadequate
 Technical Area: Visual Resources
 Project Manager: James Reede

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Revision No. 01 Date July 5, 2006
 Technical Staff: Gary Collord
 Technical Senior: Dale Edwards

Project: Vernon Power Plant
 Docket: 06-AFC-4

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Sec. 8.11.2.2 and 3; pgs. 8.11-2 thru 4. Sec. 8.11.3.4 thru 8.11.3.5; Pgs 8.11-12 thru 16 Sec. 8.11.4 and 5; pgs. 8.11-16 and 17	Yes	
Appendix B (g) (6) (A)	Descriptions of the existing visual setting of the vicinity of the project, the region that can be seen from the vicinity of the project, and the proposed project site. Include:	Sec. 8.11.2.2; pgs 8.11-2.	Yes	
Appendix B (g) (6) (A) (i)	Topographic maps at a scale of 1:24,000 of the areas from which the project may be seen, identification of the view areas most sensitive to the potential visual impacts of the project, and the locations where photographs were taken for (g)(6)(E);	Figure 8.1-1; pg. 8.11-22	Yes	
Appendix B (g) (6) (A) (ii)	Elevations of any existing structures on the site; and	Sec. 8.11.2.3; pg. 8.11-2 Sect. 2.5; pgs 18-22. <u>Vernon Power Plant, Data Adequacy Supplement A</u>	No <u>Yes</u>	Please provide elevation drawings or photographs with dimensions of the existing aluminum processing facility located on the project site. <u>The plan view drawing and elevation-view photographs provided for all sides of the existing structure, in the data adequacy supplement, satisfy this requirement.</u>
Appendix B (g) (6) (A) (iii)	The visual properties of the topography, vegetation, and any modifications to the landscape as a result of human activities.	Sec. 8.11.2.3; pgs. 8.11-2 and 3.	Yes	
Appendix B (g) (6) (B)	An assessment of the visual quality of those areas that will be impacted by the proposed project.	Sec. 8.11.2.5; pg. 8.11-4	Yes	

Adequacy Issue: Adequate Inadequate
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 Project Manager: James Reede

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Revision No. 01 Date July 5, 2006
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Project: Vernon Power Plant
 Docket: 06-AFC-4

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (6) (C)	After discussions with staff and community residents who live in close proximity to the proposed project, identify the scenic corridors and any visually sensitive areas potentially affected by the proposed project, including recreational and residential areas. Indicate the approximate number of people using each of these sensitive areas and the estimated number of residences with views of the project. For purposes of this section, a scenic corridor is that area of land with scenic natural beauty, adjacent to and visible from a linear feature, such as a road, or river.	Sec. 8.11.2.6; pgs. 8.11-4 and 5. Sec. 8.11.2.6.1 thru .3; pgs. 8.11-6 thru 8.	Yes	
Appendix B (g) (6) (D)	A description of the dimensions, color, and material of each major visible component of the project.	Table 8.11-2; pg. 8.11-10	Yes	
Appendix B (g) (6) (E)	Full-page color photographic reproductions of the existing site, and full-page color simulations of the proposed project in the existing setting from each location representative of the view areas most sensitive to the potential visual impacts of the project.	Figures 8.11-2 thru 4; pgs. 8.11-24 thru 26.	Yes	
Appendix B (g) (6) (F)	An assessment of the visual impacts of the project, including light and glare, and visible plumes.	Sec. 8.11.3.4 (.1 thru .5); pgs. 8.11-12 thru 15.	Yes	
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	Tables 8.11-3 thru 6; pgs. 8.11-18 thru 21.	Yes	

Adequacy Issue: Adequate Inadequate

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Technical Area: Visual Resources

Project: Vernon Power Plant

Technical Staff: Gary Collord

Project Manager: James Reede

Docket: 06-AFC-4

Technical Senior: Dale Edwards

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Tables 8.11-3 thru 6; pgs. 8.11-18 thru 21.	Yes	
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	Tables 8.11-3 thru 6; pgs. 8.11-18 thru 21.	Yes	
Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.	Table 8.11-7; pg. 8.11-22	Yes	
Appendix B (h) (4)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Sec. 8.11.7; pg. 8.11-22.	Yes	

Adequacy Issue: Adequate Inadequate

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Revision No. 01 Date August 31, 2006

Technical Area: Waste Management

Project: Vernon Power Plant

Technical Staff: Ellie Townsend-Hough

Project Manager: James Reede

Docket: 06-AFC-4

Technical Senior: Paul Richins

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (1) (C)	A detailed description of the design, construction and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	Pages 1-1 to 1-3 Sections 1.2 – 1.7, Pages 2-1 to 2 - 24 Sections 2.1 -2..4.4, Pages 8.13-6 to 8.13-16 Sections 8.13.4 - 8.13.8	Yes	
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Pages 4-1 to 4-3 Section 4.0, Pages 8.13-15 to 8.13-16 Section 8.13.6.3	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Page 8.13-16 Section 8.13.7, Page 8.13-4 Section 8.13.3	Yes	
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination.	Section 8.13.3, Page 8.13-5 Supplement A, August 25, 2006	No Yes	Staff requires copies of the Phase I and Phase II Environmental Site Assessments mentioned on pg 8.13-5 Section 8.13.3 of the AFC.

Adequacy Issue: Adequate Inadequate
 Technical Area: Waste Management
 Project Manager: James Reede

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Revision No. 01 Date August 31, 2006
 Technical Staff: Ellie Townsend-Hough
 Technical Senior: Paul Richins

Project: Vernon Power Plant
 Docket: 06-AFC-4

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.	Pages 8.13-7 to 8.13-8 Table 8.13-2	Yes	
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under Title 23, California Code of Regulations, § 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.	Pages 8.13-11 to 8.13-13 Section 8.13.5	Yes	
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.	Page 8.13-7 to 8.13-8 Table 8.13-2 Section 8.13.4.1 Page 8.13-10 – 8.13-11 Table 8.13-3	Yes	
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	Page 8.13-2 Table 8.13-1	Yes	

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Technical Staff: Ellie Townsend-Hough

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Page 8.13-17 Table 8.13-5, Page 8.13-17 Table 8.13-6	Yes	
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	Pages 8.13-2 to 8.13-4 Section 8.13.2	Yes	
Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.	Page 8.13-17 Table 8.13-5	Yes	
Appendix B. (i) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Pages 8.13.4 to 8.13.6 Section 8.13.3	Yes	
Appendix B (i) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Pages 8.13-6 to 8.13-15 Sections 8.13.4 to 8.13.6.2.2	Yes	