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Project Title:	Sonoran Energy Project (formerly Blythe Energy Project Phase II) - Compliance
TN #:	211954
Document Title:	Sonoran Energy Project - Additional Water Information: Clarification Requests and Responses 20160622
Description:	Sonoran Energy Project - Additional Water Information: Clarification Requests and Responses 20160622
Filer:	Mary Dyas
Organization:	CH2M HILL/ J. Salamy
Submitter Role:	Applicant Consultant
Submission Date:	6/23/2016 9:27:30 AM
Docketed Date:	6/23/2016

Dyas, Mary@Energy

From: Jerry.Salamy@CH2M.com
Sent: Wednesday, June 22, 2016 8:47 AM
To: Dyas, Mary@Energy
Cc: Scott.Valentino@altagas.ca; ktcastanos@stoel.com
Subject: RE: Clarification on 6/15/16 Water Submittal

Hi Mary,

Below are AltaGas's responses to your questions.

1. In the Data Responses to Water Workshop Data Requests submitted 6-15-2016, it is stated on page 3-1 section 3.1 "the SEP design will include 100 percent redundant wastewater systems sized to accommodate the discharge from both SEP and BEP while operating at their rated capacities." Could you clarify this statement? Does it mean the SEP could be processing the wastewater from both SEP and BEP? What is the purpose of the redundant wastewater treatment system at SEP?

   Response: The proposed SEP/BEP wastewater disposal design requires that the wastewater treatment systems at both facilities are operational at all times wastewater is being generated. As such, the Project Owner proposes to install redundant capacity at SEP to accommodate the wastewater flows from both projects in the event the BEP's wastewater treatment system is not operational. The purpose of the redundant wastewater treatment systems is to recycle water to the extent economically feasible, thereby reducing the volume of discharge to the BEP evaporation ponds. To clarify, when the BEP wastewater treatment system is not operational, BEP wastewater would be treated at SEP. The redundant SEP wastewater treatment system eliminates the need for the BEP WDR condition 4.d. that requires each pond have sufficient additional depth to provide additional storage capacity for increased inflow for a minimum of two (2) weeks, assuming the brine concentration and reverse osmosis (RO) equipment are both inoperable.

2. How many WDR permits will be needed or need to be revised?

   Response: The Project Owner expects to revise the Blythe Energy Project's Waste Discharge Requirement permit, and to apply for a Waste Discharge Requirement permit for the Sonoran Energy Project's emergency use evaporation ponds.

3. What were the water use assumptions for the discharge calculations at Blythe I and SEP? The proposed maximum use is 2,800 AFY, how much of this is used in the calculation.

   Response: The follow presents the well water consumption assumed in the discharge calculations for BEP and SEP.

   The BEP well water flow rate is 2,200 gallons per minute (see BEP Final Staff Assessment). Assuming BEP operates for 8,400 hours per year at a well water flow rate of 2,200 gallons per minute, annual well water use is 1.1088×10^9 gallons per year or 3,400 acre-feet per year.

   The SEP water balance shows well water use of 1,584 gallons per minute under average conditions and 2,223 gallons per minute under maximum conditions. Assuming SEP operates 5,500 hours per year under average conditions and 1,500 hours per year at maximum temperature conditions, annual well water use is 7.2279×10^8 gallons per year or 2,218 acre-feet per year.

4. Have you had any correspondence with the Water Board regarding this discharge plan?

   Response: The Project Owner discussed the proposed SEP/BEP wastewater discharge plan with the Regional Board (Ms. Jeannie Snyder) prior to and at the water resources workshop. No subsequent discussions have occurred since filing the response on June 15, 2016.

5. Please confirm, the total capacity of the ponds is 91 AF, 45.5 AF each, 10 -feet deep if filled to the very top, 8 acres of evaporation surface at the very top.

   Response: The BEP WDR describe each evaporation pond as having a storage volume at high water level of about 91 acre-feet with a surface evaporation area of approximately 8 acres.[1] Based on engineering drawings, the calculated capacity of each pond with 10 feet of water is about 72.5 acre-feet .

6. The PTA, Table 2-3 show "Average Annual Use" and 23.1 million gallons per year. What is this?

   Response: The March 7, 2016 filing (TN# 210635) titled "SEP Revised Wastewater Disposal Method" proposed revisions to Table 2-3 that change the title of the column from "Average Annual Use" to "Average Annual Discharge" and reduces the annual average wastewater discharge from 23.1 million gallons per year to 6.6 million gallons per year.

1. http://www.waterboards.ca.gov/coloradoriver/board_decisions/adopted_orders/orders/2015/0028blytheenergy_wdr.pdf

Thanks,

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From: Dyas, Mary@Energy [mailto:Mary.Dyas@energy.ca.gov]
Sent: Thursday, June 16, 2016 2:38 PM
To: Salamy, Jerry/SAC <Jerry.Salamy@CH2M.com>
Subject: Clarification on 6/15/16 Water Submittal

Jerry,

Staff has a couple of questions to clarify information received in yesterday's SEP Water filing.

1. In the Data Responses to Water Workshop Data Requests submitted 6-15-2016, it is stated on page 3-1 section 3.1 "the SEP design will include 100 percent redundant wastewater systems sized to accommodate the discharge from both SEP and BEP while operating at their rated capacities." Could you clarify this statement? Does it mean the SEP could be processing the wastewater from both SEP and BEP? What is the purpose of the redundant wastewater treatment system at SEP?

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6. The PTA, Table 2-3 show "Average Annual Use" and 23.1 million gallons per year. What is this?

Thanks,
Mary

Mary Dyas

Mary Dyas | Compliance Project Manager

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