



COUNTY OF RIVERSIDE • COMMUNITY HEALTH AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH

April 21, 2010

State of California
Energy Commission
Attn: Alan Solomon
1516 Ninth Street,
Sacramento, CA 95814-5512

DOCKET

09-AFC-6

DATE APR 21 2010

RECD. MAY 05 2010

SUBJECT: BLYTHE AND PALEN SOLAR POWER PROJECTS

Dear Mr. Solomon:

The Department of Environmental Health (DEH) has reviewed the application for certification to construct and operate the Blythe Solar Power Project and the Palen Solar Power Project. Both of these projects appear to be located in the eastern desert area of the County of Riverside as well as are similar in scope and nature. Therefore, our comments included in this letter will be applicable to both projects.

Within each project, it appears that domestic water will be provided to more than 25 employees year round from onsite wells. As a result, the project's water system is classified as a non-community, non-transient domestic water systems and would have to meet all appropriate State and Federal EPA requirements. With respect to these types of water systems, the State Department of Public Health has granted Primacy to DEH to enforce these regulations.

Based on historical knowledge, the groundwater at these two sites does not appear to meet chemical quality health standards. Consequently, extensive treatment may be required which must be conducted in an approved manner. The water system in its entirety including the method of water quality treatment must be supervised by a State of California Certified Water Treatment Plant Operator. Other requirements include meeting State of California T.M.F. (Technical, Managerial, and Financial) requirements as prescribed by State Law.

All new wells drilled onsite will require a well drilling permit from DEH. Prior to any construction of the domestic water system, engineered plans must be submitted and approved by DEH. Once the plans have been approved, DEH will also inspect and final the construction of the domestic water system. Moreover, the ongoing operation of the domestic water system will be subjected to a renewable annual operating permit issued by DEH. Any questions regarding the domestic water system or well(s) should be directed to the DEH Water Engineering Section at (760) 393-3390.

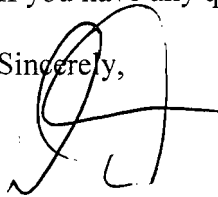
Alan Solomon
State of California, Energy Commission
April 7, 2010

Both projects must obtain written clearance from the Regional Water Quality Control Board (RWQCB) for onsite wastewater discharge. It should be noted that the RWQCB may require an Advanced Treatment Unit (ATU) for each project to reduce nitrate concentrations, B.O.D. and/or treat pathogenic agents. However, if an ATU system is not required by RWQCB, a conventional onsite wastewater treatment system may be allowed by DEH provided that it meets all requirements as delineated in the Uniform Plumbing Code, DEH Technical Guidance Manual and County of Riverside Ordinance 650.5. For any wastewater related questions, please contact DEH Land Use Section at (760) 393-3390.

The facility may require a business emergency plan for the storage of hazardous materials greater than 55 gallons, 200 cubic feet or 500 pounds, or any acutely hazardous materials or extremely hazardous substances. If further review of the site indicates additional environmental health issues, the Hazardous Materials Management Division reserves the right to regulate the business in accordance with applicable County Ordinances. Please contact the Hazardous Materials Management Division, at (760) 863-8976 for any additional requirements.

If you have any questions regarding this letter please contact me at (951) 955-8980.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Mistica", written over the word "Sincerely,".

Michael Mistica, R.E.H.S.
Environmental Health Specialist IV