

DOCKET

09-AFC-6

DATE MAY 13 2010

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May 13, 2010

Alan Solomon
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: **Blythe Solar Power Project, Docket No. 09-AFC-6**
Responses to Questions from the April 28, 29 and May 7, 2010 CEC Workshops
Technical Areas: Worker Safety/Hazardous Materials/Water Resources

Dear Mr. Solomon:

Attached please find the first set of responses to questions generated at the April 28, 29, and May 7, 2010 CEC Workshops for the Blythe Solar Power Project.

If you have any questions on this submittal, please feel free to contact me directly.

Sincerely,



Alice Harron
Senior Director, Development

BLYTHE SOLAR POWER PROJECT (09-AFC-6)
APRIL 28, 29 & May 7, 2010 CEC WORKSHOP REQUESTS

Date: May 13, 2010

At the Staff Assessment Workshops on April 28-29, 2010, several requests for information were made by Dr. Alvin Greenberg to clarify his analysis on Worker Safety and Hazardous Materials. In addition, several items were requested at the Soil & Water Workshop on May 7, 2010. The following materials are provided to address these requests.

Technical Areas: Worker Safety and Hazardous Materials

WORKSHOP REQUEST-1

Information Required:

Clarify the Applicant's plans for fire protection equipment and prevention onsite during construction.

Response:

PVSI will have sufficient capacity firewater storage tank and portable equipment installed onsite prior to and for the duration of construction to comply with the applicable Fire Code. Additional details will be provided in the project's Construction Fire Prevention Plan, in accordance with proposed Condition of Certification WORKER SAFETY-1. A draft of this plan will be provided to the Riverside County Fire Dept for review and to the CEC CPM for approval.

WORKSHOP REQUEST-2

Information Required:

Clarify the Applicant's plans for fire protection equipment and prevention onsite during operation.

Response:

To be provided in a separate submittal by May14, 2010.

WORKSHOP REQUEST-3

Information Required:

In the SA/DEIS Comments submitted on April 19, 2010, the Applicant provided a clear description of the paving for Black Rock Rd. Clarify the specifications for the entire access road into BSPP by providing the entire length of the road, width of the road, and whether culverts will be included in the road design to address drainage.

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Response:

The entire length of the access road is 22,890 feet or approximately 4.34 miles. This length is measured from the location of the solar array assembly hall on the Project site to the western terminus of Black Rock Road. If the paving and upgrade to Black Rock Road itself is included in the measurement, the entire road will be 26,390 feet or approximately 5 miles. The entire road will be suitable for heavy haul to bring equipment into the site for construction. In addition, the design will include culverts and other elements to properly address drainage issues. The width of the entire access road will be the same as previously indicated for the paving of Black Rock Road: 32 feet.

WORKSHOP REQUEST-4

Information Required:

Submit an update to HAZ-MAT Appendix A to provide all chemicals planned to be stored onsite as well as maximum quantities for each chemical.

Response:

To be provided in a separate submittal by May14, 2010.

WORKSHOP REQUEST-5

Information Required:

Describe the security and safety measures that will be enforced in order to allow private landowners of the parcel(s) inside the site to access their property.

Response:

There are two 160-acre private parcels near the BSPP site, a northern parcel located between the two southern solar field units (units #3 and #4) and a southern parcel located southeast of solar field unit #3. The northern 160-acre parcel is unoccupied and is located south of the planned location for the assembly hall and laydown area. In the first half of BSPP's construction for the two northern solar units (#1 and 2), all construction activities will be north of the private properties around the BSPP site and the fence line/security for this portion of construction. When construction commences on the southeastern unit (#4), the northern parcel will be entirely surrounded by construction activities. In this final phase of construction, PVSII will leave open an access way through to the south. The northern parcel would be fenced for approximately 80% of its perimeter except for the southern-facing access way. The security gate would be located north of the culverts/bridge over the drainage channel so the land owner could use PVSII's bridge. Further safety and security measures are described below that will apply to this parcel's landowners once the parcel is located within the security fencing of BSPP (i.e., during construction of unit #4 and during Project operation).

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The southern 160-acre parcel owned by Lin Porter is located southeast of solar field #3, as noted above. Access to the Porter property will never be hindered during construction or operation as it is located outside the fence line of the BSPP facility. Therefore, safety and security measures identified below do not apply to this landowner/parcel.

With respect to private landowner access to the site during BSPP construction:

From a Safety perspective:

Property owners will be provided a safety orientation and a brief orientation to the sensitivities, and appropriate procedures to be followed with respect to biological, cultural, and paleontological resources on the site. Visitors that accompany the property owner who will be on the BSPP site more than 3 days in a row will also be given a safety orientation. The property owners and visitors will have access only to the private property and to the access road leading to the private property; they will not be allowed elsewhere on the construction site.

With respect to private landowner access to the site during BSPP operation:

From a Safety perspective:

The owners of the properties will be provided an orientation briefing on the safety evacuation plan as issued by the BSPP Plant Manager. This will familiarize the property owners with the site evacuation plan and provide specific information such as the number of siren blows that would be used in case of an emergency.

From a Security perspective:

During Project construction, vehicle license plates of the owners of the private properties will be collected and given to the EPC contractor's site security guard. Access to the northern portion of the private property will be through the construction gate, where they will be announced to the SM construction office before they are given permission to enter the construction site. When bringing visitors, these visitors will be logged in with the SM construction office. If the visitors will be on the construction site more than 3 days in a row, they will be given a safety orientation.

During Project operation, a similar procedure would be implemented through the main gate to the plant site (vehicle license plates of the property owners collected by site security personnel; arrivals announced at the main gate prior to site entry). Visitors that accompany the property owner will be appropriately logged in and if they visit the site more than three days in a row, they will be given a safety orientation.

WORKSHOP REQUEST-6

Information Required:

The Applicant requested a modification to HAZ-4 to require isolation valves at the end of each loop such that the maximum HTF volume between valves is 1,250 gallons rather than 600 gallons. CEC requested an explanation of how long it would take 1,250 gallons of Heat Transfer Fluid (Therminol) to burn.

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Response:

To be provided in a separate submittal by May14, 2010.

WORKSHOP REQUEST-7

Information Required:

Describe how BSPP's security plans address potential cyber-security threats.

Response:

None of the power plant control systems are designed to allow for remote access from the internet. SCE will follow appropriate CAISO industry standards on their design for the Colorado River Substation. PVSI will follow all SCE and CAISO requirements on power plant controls and access to the grid.

WORKSHOP REQUEST-8

Information Required:

How close is the residence on Lin Porter's property to the edge of a solar field?

Response:

The residence is located approximately 600 feet from the eastern fenceline of the Unit #3 solar field. However, the actual closest solar trough will be approximately 672 feet east of the residence as the solar troughs are set back an additional 72 feet from the fenceline. There are no public health restrictions (air quality, health risks, or risk management) that would be of concern for a resident located within this distance.

Technical Area: Water Resources

WORKSHOP REQUEST-9

Information Required:

Provide a technical memo describing the design and operating criteria for our evaporation ponds.

Response:

To be provided in a separate submittal by May 14, 2010.

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WORKSHOP REQUEST-10

Information Required:

Provide the length of the northern channel for which earthen berms are proposed.

Response:

For the North Channel, PVSI proposes earthen berms that extend for 13,885 feet of the total channel length of 29,256 feet. The berms would start at a point 4,825 feet east of the western property boundary (just east of the natural wash) and would extend to a point 18,710 ft east of the west property boundary (the location where the channel transitions from a width of 100 feet to a width of 150 feet).

WORKSHOP REQUEST-11

Information Required:

Submit the Report of Waste Discharge permit application to both CEC and the RWQCB in time for evaporation pond analysis to be completed in the Revised SA.

Response:

The ROWD will be submitted separately by May 14, 2010.

WORKSHOP REQUEST-12

Information Required:

Provide revised language for Soil & Water-13 to address constructability/performance criteria concerns for a 3:1 channel slope.

Response:

The following revised language is offered for Condition Soil & Water -13 to allow more design flexibility on the slope of drainage channels.

Design and construction criteria for the use of soil cement on the site shall be prepared by the Owner/Developer's engineer in conjunction with the design methodology established by the Geotechnical Engineer of Record. The design and construction criteria shall be based on local and/or regional requirements and specifications. The design and construction criteria, the Geotechnical design for the soil cement, the site specific specifications for the soil cement, the method of installation for the soil cement, and the local or regional standards being used for the design criteria shall be provided to the CEC CPM for review and comment prior to any field installation of soil cement. The slope requirements that are proposed for use (3:1 or 4:1), and the associated method of installation (i.e. 8 inch lift versus slope application) shall be fully documented for review and approval by the CBO prior to any field installation of soil cement.

**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:
APPLICATION FOR CERTIFICATION
for the *BLYTHE SOLAR POWER PROJECT*

Docket No. 09-AFC-6
PROOF OF SERVICE
(Revised 1/26/2010)

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DECLARATION OF SERVICE

I, Carl Lindner, declare that on, May 13, 2010, I served and filed copies of the attached Blythe Solar Power Project Materials:

Responses to Questions from the April 28, 29 and May 7, 2010 CEC Workshops
Technical Areas: Worker Safety/Hazardous Materials/Water Resources

The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[\[http://www.energy.ca.gov/sitingcases/solar_millennium_blythe\]](http://www.energy.ca.gov/sitingcases/solar_millennium_blythe).

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

sent electronically to all email addresses on the Proof of Service list;

_____ by personal delivery or by overnight delivery service or depositing in the United States mail at Camarillo, California with postage or fees thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

_____ depositing in the mail an original and 12 paper copies, along with 13 CDs, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 09-AFC-6

1516 Ninth Street, MS-4

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docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.


