

## DOCKETED

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<b>Project Title:</b>	El Segundo Power Redevelopment Project Compliance
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**CALIFORNIA ENERGY COMMISSION**

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August 16, 2013

NRG Energy  
George L. Piantka  
Director, Environmental Business  
5790 Fleet Street, Suite 200  
Carlsbad, CA 92008

**RE: EL SEGUNDO ENERGY CENTER AMENDMENT, (00-AFC-14C)  
DATA REQUEST SET 2 (Nos. 84 - 90)**

Dear Mr. Piantka:

Energy Commission staff has reviewed the Petition to Amend (Petition) for the El Segundo Energy Center Amendment and requires additional information to supplement the environmental analysis, pursuant to Title 20, California Code of Regulations, Section 1769(a)(1)(E). The information requested is necessary to: 1) more fully understand the project; 2) assess whether the facility would be constructed and operated in compliance with all applicable laws, ordinances, regulations, and standards; 3) assess whether the project would result in significant environmental impacts; 4) assess whether the facilities would be constructed and operated in a safe, efficient, and reliable manner; and 5) assess potential mitigation measures.

This set of data requests (Nos. 84 - 90) is being made in the areas of: Socioeconomics (Nos. 84 - 85), Visual Resources (No. 86) and Waste Management (Nos. 87 – 90)

Staff requests that written responses to the enclosed data requests be provided on or before September 16, 2013. If you are unable to provide the information requested, need additional time, or you object to providing the requested information, please send a written notice to both the Siting Committee for the El Segundo Energy Center Amendment and me within 20 days of receipt of this information request. The notification should contain the reasons for not providing the information and the grounds for any objections.

If you have any questions, please call me at (916) 654-4781 or email me at [craig.hoffman@energy.ca.gov](mailto:craig.hoffman@energy.ca.gov).

Sincerely,

Craig Hoffman  
Compliance Project Manager

Enclosure

**Technical Area:** Socioeconomics  
**Author:** James Adams

## **BACKGROUND**

Pg. 2-26 of the Petition to Amend (PTA) notes that Table 2-20 lists the projected total construction craft workers by month for the El Segundo Energy Center (ESEC). An estimated peak of 422 craft and professional personnel is anticipated in months 11 and 12 following construction mobilization. Pg. 3-118 notes the proposed addition of the El Segundo Power Facility Modification (ESPFM) to the ESEC project will have a peak of 337 construction workers over an 18-month period. There is no table for demolition and construction craft workers by month for the ESPFM.

## **DATA REQUEST**

84. Please provide a new table showing ESPFM demolition and construction craft workers by month for the 6-month demolition period and the 18-month construction period.

## **BACKGROUND**

The socioeconomics analysis provides some information related to the capital costs and construction and operation payroll for the ESPFM on pg. 3-118 of the PTA. Other information related to local demolition, construction, and operation expenditures on materials and supplies or indirect and induced employment is not provided. Project owners proposing modifications to power plants and applicants proposing new power plants often perform an IMPLAN model analysis. IMPLAN is an input-output model that relies on a series of multipliers to provide estimates of the number of times each dollar of input or direct spending cycles through the economy in terms of indirect and induced output or additional spending, personal income, and employment. Staff would use this information in analyzing the socioeconomic benefits of the ESPFM on the local economy.

## **DATA REQUEST**

85. Please perform an IMPLAN or similar analysis regarding the socioeconomic impacts from the demolition, construction, and operation of the ESPFM. Please provide a demolition and construction economic benefits table that displays capital cost, total demolition payroll, total construction payroll, average annual local construction payroll, average monthly direct demolition and construction employment, indirect and induced employment, indirect and induced income, annual local expenditures on materials and supplies, and total sales tax. Please provide an operations and maintenance (O&M) economic benefits table that displays annual O&M payroll, annual O&M employment, indirect and induced income and employment, expenditures for locally purchased materials and supplies, total sales tax, and total annual property taxes beginning with the first year of operation following construction of the ESPFM.

**Technical Area:** Visual Resources  
**Author:** Christina Snow

## **BACKGROUND**

In the original 2000 application for certification (00-AFC-14), nine key observation points (KOPs) were identified and analyzed. Five KOPs (KOP 1, 2, 3, 7 and 8) were carried forward for determination of visual impacts in the 2010 Final Revised Staff Analysis for the El Segundo Power Redevelopment project.

In the 2013 petition to amend to replace the once-through cooling units 3 and 4 with one new combined cycle generator (Unit 9), one steam turbine generator (Unit 10) and two simple-cycle gas turbines (Units 11 and 12), the facility owner has included an additional KOP located along the Strand near 44<sup>th</sup> Street in Manhattan Beach (KOP 10). In a recent field visit staff identified an additional KOP that would take into consideration the residences and public viewpoints along 45<sup>th</sup> Street, near Vista Del Mar. This additional KOP provides an elevated view of the project site.

Please see the attached figure representing a potential location of a new KOP.

## **DATA REQUEST**

86. Please provide a new KOP from the area depicted in Figure A that reflects the existing viewshed and simulated view along 45<sup>th</sup> Street, approximately 100 feet east of Vista Del Mar in order for staff to analyze potential visual impacts from the proposed new project components (including construction and demolition equipment, the proposed administration building, proposed units 9-12, and parking).

**VISUAL RESOURCES DATA REQUEST - FIGURE A**

El Segundo Power Redevelopment Project - "Potential New KOP", "45th Street and Highland Avenue"



VISUAL RESOURCES

**Technical Area:** Waste Management  
**Author:** Mike Conway

## **BACKGROUND**

The El Segundo LLC Generating Station is an active cleanup site listed in the State's Envirostor database. The site is said to be contaminated with polychlorinated biphenyls (PCBs) and vanadium. An updated description of the site contamination and cleanup efforts were not provided in the Petition to Amend.

Staff requires a complete understanding of the existing contamination locations relative to the planned disturbance areas. The Petition to Amend does not clearly show the locations of all power generating units relative to areas of contamination or whether adequate remediation will be completed prior to construction to ensure protection of the public and worker safety. In addition, it is not clear whether construction and operation could exacerbate existing conditions and result in spread of contaminants off site.

## **DATA REQUESTS**

87. Please provide an updated Phase I Environmental Site Assessment (ESA) identifying recognized environmental concerns in and adjacent to the footprint of the proposed project.
88. Please provide a map of contaminated areas on the site and where construction, demolition, or other disturbance may take place.
89. Please provide a list agencies involved in clean-up of the site along with their responsibilities and contact information.
90. Please provide the "Draft Closure Plan for the El Segundo Energy Center Retention Basin Site."