

**DOCKETED**

<b>Docket Number:</b>	07-AFC-06C
<b>Project Title:</b>	Carlsbad Energy Center - Compliance
<b>TN #:</b>	231223
<b>Document Title:</b>	Non-Potable Water Use Plan SOIL&WATER-2
<b>Description:</b>	Non-Potable Water Use Plan for the Demolition of Encina Power Station
<b>Filer:</b>	Anwar Ali
<b>Organization:</b>	Carlsbad Energy Center LLC
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	12/13/2019 3:44:26 PM
<b>Docketed Date:</b>	12/13/2019



December 13, 2019

Mr. George Piantka  
Director Regulatory Environmental Service  
NRG Energy, Inc., West Region  
4600 Carlsbad Boulevard  
Carlsbad, California 92008

**SUBJECT: ENCINA POWER STATION/AMENDED CARLSBAD ENERGY  
CENTER PROJECT (07-AFC-06C) – APPROVAL OF DEMOLITION PLANS**

Dear Mr. Piantka:

In accordance with the Conditions of Certification, staff has reviewed and approved the following plans:

- Public Notification Process (**NOISE-1**);
- Noise Control Plan (**NOISE-3**);
- Storm Water Pollution Prevention Plan (**SOIL&WATER-1**);
- Non-Potable Water Use Plan (**SOIL&WATER-2**);
- Traffic Control Plan (**TRANS-1**); and
- Waste Management Plan (**WASTE-5**).

If you have any questions or concerns, please contact Anwar Ali, Compliance Project Manager, at (916) 654-5020, or by fax to (916) 654-3882, or via e-mail at [anwar.ali@energy.ca.gov](mailto:anwar.ali@energy.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Jonathan Fong".

Jonathan Fong  
Compliance Office Supervisor  
Siting, Transmission, and Environmental  
Protection Division



**NRG Encina Cabrillo I Power  
Operations, Inc.**  
4600 Carlsbad Boulevard  
Carlsbad, CA 92008  
Phone: 760-268-4000  
Fax: 760-268-4026

October 11, 2019

Mr. Anwar Ali, PhD  
Compliance Project Manager  
Carlsbad Energy Center Project (07-AFC-6C)  
California Energy Commission  
1516 Ninth Street, MS2000  
Sacramento, CA 95814

**Subject: ENCINA POWER STATION (Cabrillo Power I LLC) DEMOLITION,  
DOCKET NO. 07-AFC-06C, CONDITION OF CERTIFICATION – SOIL&WATER-2,  
NON-POTABLE CONSTRUCTION WATER USE PLAN**

Dear Mr. Fong:

Carlsbad Energy Center LLC (“Project Owner”) submits the attached Non-Potable Construction Water Use Plan (Plan) in compliance with Condition of Certification (COC) SOIL&WATER-2 for the demolition of the Encina Power Station located at 4600 Carlsbad Boulevard, Carlsbad, California, for the Amended Carlsbad Energy Center Project (Amended CECP), Docket No. 07-AFC-06C. The CECP license includes requirements to decommission and demolish Encina.

COC SOIL&WATER-2 requires that the Project Owner provide a Plan for the supply and use of non-potable water for demolition activities. COC SOIL&WATER-2 requires submittal of the Plan to the California Energy Commission Compliance Project Manager for review and approval.

If you have any questions regarding this submittal, please contact George Piantka at (760) 707-6833.

Sincerely,

A handwritten signature in black ink, appearing to read "George Piantka", is written over a light blue circular stamp.

George Piantka,  
Sr. Director, Environmental Regulatory Services  
NRG Energy, West Region

Enclosures: Non-Potable Construction Water Use Plan, Encina Power Station Demolition,  
Condition of Certification, SOIL&WATER-2, October 2019

Cc: Chris Kimball, WC3, Delegate CBO  
Timothy Sisk- NRG Energy  
File

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**SOIL&WATER-2**

**Non-Potable Construction/Demolition Water  
Use Plan  
Amended Carlsbad Energy Center Project  
(07-AFC-06C)**

**San Diego County, California**

Adapted by Burns & McDonnell Engineering Co.  
for  
ACECP Phase IV EPS Demolition Activities  
on behalf of

**Cabrillo Power I LLC**  
4600 Carlsbad Blvd.  
Carlsbad, CA 92008

From the document previously prepared in November 2015 by

CH2MHill  
6 Hutton Centre Drive  
Suite 700  
Santa Ana, CA 92707

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## Acronyms and Abbreviations

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Amended CECP	Amended Carlsbad Energy Center Project
CEC	California Energy Commission
COC	Condition of Certification
CPM	Construction Compliance Manager
EPS	Encina Power Station
NCTD	North County Transit District
Plan	Non-Potable Construction Water Use Plan
Project Owner	Cabrillo Power I LLC
PTA	Petition to Amend
SDG&E	San Diego Gas and Electric

## SECTION 1

# Introduction

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Cabrillo Power I LLC (“Project Owner”) has prepared this Non-Potable Construction Water Use Plan (Plan) for the Amended Carlsbad Energy Center Project (“Amended CECP” or “Project”) in San Diego County, California. This Plan is applicable to the activities associated with the Petition to Amend (PTA), as submitted by the Project Owner in April of 2014 and has been prepared in accordance with Condition of Certification (COC) SOIL&WATER-2 in the California Energy Commission’s (CEC) Amended CECP Final Decision (07 AFC-06C; July and November 2015).

The purpose of this Plan is to identify mitigation, monitoring and compliance measures to ensure compliance with the COC SOIL&WATER-2. This Plan has been prepared to address Phase IV activities of the Amended CECP including demolition of the Encina Power Station (EPS).

A Plan was submitted in September 2014 for CECP Phase I demolition/removal activities for Tanks 5, 6, and 7, in support of the relevant COCs adopted by the CEC in its June 2012 Final Decision (07-AFC-06C). The Plan was updated in July 2015 for Amended CECP Phase I demolition of Tanks 1, 2, and 4, and as needed soil remediation in the tank basins, in support of the COCs proposed by the CEC in its June 2015 Amended CECP Presiding Member’s Proposed Decision (07-AFC-06C). After CEC Compliance Project Manager (CPM) approval, CECP Phase I activities commenced in February 2014 and Amended CECP Phase I activities commenced in July 2015. A separate plan for Phase II construction activities was prepared in November 2015 with work concluding in September 2018. Phase III decommissioning activities commenced in December 2018.

## 1.1 Project Location

The Amended CECP site is located in Carlsbad, San Diego County, California (Figure 1). The site address is 4600 Carlsbad Boulevard, Carlsbad, California 92008. The Amended CECP site is located in Township 12 South, Range 4 West, Section 7, in San Diego County. The Amended CECP site is bordered to the east by Interstate 5, to the south by the SDG&E maintenance yard, to the west by the Pacific Ocean, and to the north by the Agua Hedionda Lagoon. The Amended CECP site is bisected by the North County Transit District (NCTD) Railroad right-of-way that runs north and south through the EPS. Cabrillo Power I LLC operates a private rail crossing under a license agreement with NCTD, enabling internal vehicle traffic to cross the rail line. Residential, commercial, agricultural, and open space land uses are also situated nearby.

## 1.2 Project Description

The Amended CECP has been divided into four phases as follows:

- **Phase I** – Above grade demolition/removal activities for Tanks 1, 2, 4, 5, 6, and 7 including soil remediation in the tank basins, as needed, and berm removal between Tanks 4 and 5, 5 and 6, and 6 and 7. This phase includes soil disturbance and excavations associated with soil remediation activities. Above grade demolition and removal of Tanks 5, 6, and 7 was accomplished under the existing CEC License for CECP.
- **Phase II** – Site preparation, Construction, Commissioning and operation of the Amended CECP as modified by the PTA.
- **Phase III** – Retirement and decommissioning of the EPS facility.

- **Phase IV** – Demolition of the EPS facility. Phase IV specifically excludes below grade demolition and site remediation, which will be accomplished under the authority of San Diego County Environmental Health Department (site remediation) and the City of Carlsbad (redevelopment of the site for future use) subsequent to the completion of Phase IV.

Water supply required for Amended CECP construction will be pulled from a Title 22 water source provided by the city of Carlsbad located on the Amended CECP project site. The Title 22 water supply will be routed to the EPS facility through the pipe chase way which resides under the railroad and that connects the eastern and western portions of the property. The average demolition and abatement workforce is expected to range from 15 to 90 workers over an approximately 27-month period.

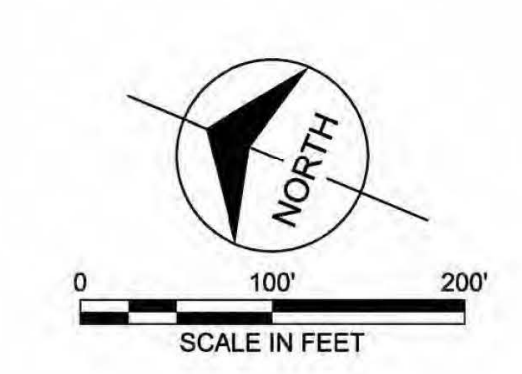


**Figure 1: Site Map**





- LEGEND**
- DEMOLITION LIMITS OF WORK
  - FENCE
  - TO BE REMOVED
  - RESTRICTED ACCESS ROAD & GATES TO DEMOLITION CONTRACTOR
  - CONTRACTOR ENTRANCE GATES
  - BUILDING
  - EXISTING FIRE HYDRANT



no.	date	by	ckd	description
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**BURNS & MCDONNELL**  
 1431 OPUS PLACE, SUITE 400  
 DOWNERS GROVE, ILLINOIS 60515  
 630-724-3200

date	SEPTEMBER 18, 2019	detailed	D. CHAVEZ
designed	H. HINKE	checked	D. BARRIS

**nrg**  
 CABRILLO POWER I LLC  
 4800 CARLSBAD BLVD  
 CARLSBAD, CALIFORNIA

**ENCINA GENERATING STATION**  
 Figure 1  
 TITLE 22 WATER

project	115381	contract	-
drawing		rev.	
sheet	of	sheets	
file	FIG_1_TITLE 22 WATER.DWG		

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## SECTION 2

# Condition of Certification

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The CEC issued COC SOIL&WATER-2, which requires preparation and implementation of this Plan as follows:

**SOIL&WATER-2:** Potable water shall not be used for any construction activity, including EPS demolition activities, that is suitable for non-potable water use if a non-potable water source is available at the project site. Prior to site mobilization, the Project Owner shall submit to the CPM a Non-Potable Construction Water Use Plan (plan) for the supply and use of non-potable water in construction activities. The plan shall consider the use of recycled water available at the site. The plan shall specify those construction activities that would use non-potable water and those construction activities that would use potable water.

Potable water use for EPS demolition activities that are suitable for non-potable water shall count toward the cumulative total limit, in accordance with SOIL&WATER-6.

**Verification:** Prior to site mobilization, the Project Owner shall submit to the CPM for review and approval the Non-Potable Construction Water Use Plan. Within the Monthly Compliance Report, the project owner shall report the volume of potable and non-potable water used and the construction activities for which each was used.

## **SECTION 3**

### **Phase IV -Demolition Water Supply and Reporting**

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The City of Carlsbad/Encina Wastewater Authority has constructed a pipeline that supplies the ACECP with reclaimed water (Title 22). The Amended CECP is connected to the pipeline for various industrial water uses during operation. This connection includes a water meter to record the volume of reclaimed water used by Amended CECP during its construction and facility operations.

Amended CECP Phase IV demolition activities will require water for fugitive dust and erosion control, equipment washing, fire protection and control, sanitary uses, and potable water for drinking. Because the majority of the Amended CECP site and access roads are paved or graveled, fugitive dust due to traffic is anticipated to be limited. Water use for equipment washing, fugitive dust and erosion control measures will comply with measures as outlined in the Air Quality Construction Mitigation Plan prepared for the Amended CECP. The quantity of water usage will vary depending on time of year and weather conditions (i.e. increased use during warmer/dry/windy conditions and decreased use during cooler/rainy season).

Amended CECP demolition activities will utilize non-potable water pulled from the Title 22 connection on the eastern side of the railroad on the Amended CECP project property. The Title 22 water supply will be routed to the EPS facility through the pipe chase way which resides under the railroad and that connects the eastern and western portions of the property. A separate water meter will be installed on the demolition water supply point. Demolition water usage will be recorded monthly and quantities of potable and non-potable water reported in the monthly compliance reports.

The Amended CECP will maintain compliance with the San Diego County – Recycled Water Check and Inspection Manual, by adhering to the requirements identified in Attachment 32: Construction Site and Recycled Water (Attachment 1).

## **Attachment 32– Construction Sites and Recycled Water**

## Attachment 32: Construction Sites and Recycled Water

An approved beneficial use of recycled water is on construction sites, mainly for dust suppression. Here recycled water is used outside of the approved watering times during active grading and construction. This is a situation where the site employees are exposed to recycled water spray and mist during normal work hours. Although it is a temporary use of recycled water, the potential for employee exposure to overspray and misting of recycled water is a health and safety concern. Consequently the following will be required at all construction sites using recycled water:

1. DEH will be notified by the recycled water purveyor of construction site use of recycled water in the purveyor's service area.
2. DEH may perform a use site inspection with the purveyor's representative.
3. The site contractor should have an employee who has attended the County Water Authority Site Supervisor training.
4. The Site Supervisor will give tailgate training on the safe use of recycled water to the site employees.
5. If the contractor does not have a trained Site Supervisor, the tailgate training can be given by the recycled water purveyors' Site Supervisor or by a DEH Site Supervisor. Records of the training are to be maintained for inspection purposes.
6. All water trucks, drop tanks, hoses, meters, and other equipment using recycled water shall have signs stating, "Recycled Water - Do Not Drink."
7. Fencing and signage shall be provided around any open pond storage of recycled water.
8. Potable water for drinking and hand washing shall be provided on the construction site.
9. Drop tanks, water trucks, hoses, etc. should be disinfected before use with other than recycled water.
10. The recycled water fill point off the main distribution system shall be marked with signage and painted the color purple.