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ES.0 EXECUTIVE SUMMARY

GWF Power Systems Company, Inc. (GWF) is seeking a fast-track license from the California Energy Commission (CEC) for the construction and operation of the Hanford Energy Park Peaker (HEPP) project. The HEPP will be located adjacent to GWF's existing Hanford cogeneration plant in the Kings Industrial Park, on the southern border of Hanford, California. The HEPP is located on a portion of the southwest quarter of Section 13, Township 19 South, Range 21 East in Kings County. The HEPP will be a nominal 95 megawatt (MW) (net) simple-cycle power plant, consisting of two natural gas–fired General Electric LM6000 PC Sprints turbine generators (CTGs), with a nominal output of 47.5 MW per unit.

One of the primary goals of the HEPP is the rapid mobilization of peak power supply to meet the critical electricity shortage identified for summer 2001. This HEPP application is being submitted in accordance with the CEC's Emergency Power Plant Permitting memorandum to achieve a 21-day approval of the project. Based on this accelerated approval process, the HEPP is planned to have a commercial operation date of September 1, 2001.

The HEPP will be located on 5 acres of the 10-acre parcel immediately adjacent to the existing GWF cogeneration plant. This 10-acre parcel is owned by GWF. The associated facilities for the HEPP include approximately 1.2 miles of double-circuit, 115-kilovolt (kV) transmission line to transmit electricity generated by the facility to the transmission grid via an existing Pacific Gas and Electric Company (PG&E) transmission line and approximately 2.8 miles of 16-inch natural gas pipeline. Both linear components will be constructed as part of the HEPP.

In May 2000 GWF Power Systems Company, Inc., applied to the California Energy Commission (CEC) using the Small Power Plant Exemption (SPPE) provision seeking permission to construct and operate a 98.6-MW power plant in the Hanford Energy Park (HEP) in the same 10-acre parcel adjoining GWFs Hanford cogeneration facility. On April 11, 2001, the CEC adopted a Mitigated Negative Declaration and approved an SPPE for the HEP (00-SPPE-1). This recently approved plant is referred to in the HEPP application as the HEP plant. Material from the May 2000 SPPE application for the HEP has been extensively used in this application for the HEPP.

The HEPP will be located on a portion of GWF property that was originally intended for the recently approved Hanford Energy Park (00-SPPE-1). GWF has been notified by PG&E that the existing transmission facilities do not have sufficient capacity to allow for operation of both the HEPP and the Hanford Energy Park. Accordingly, GWF has suspended implementation of the Hanford Energy Park. Instead, the HEPP has been configured to accommodate a future amendment to convert the proposed simple-cycle project to a combined-cycle project. The planned combined-cycle conversion project, which is not a part of this application, will include sufficient capacity to satisfy the energy needs of the Kings Industrial Park.

ES.1 PROJECT OWNERSHIP

GWF Power Systems Company, Inc., will construct, own, and operate the Hanford Energy Park Peaker. GWF is wholly owned by National Energy Partners (NEP). NEP is a partnership owned equally by Harbert Cogen, Inc., and PSEG Global USA Inc. Since 1989, GWF has constructed, owned, and operated six small power plant/cogeneration facilities in California with a combined generating capacity of 125 MW. Five of these plants are located in Contra Costa County and one

is located in the Kings Industrial Park in Hanford, California. It is GWF's intention that the electricity produced by the HEPP will be sold to the California Department of Water Resources (CDWR). A Memorandum of Understanding to this effect has been signed with CDWR.

ES.2 PROJECT SCHEDULE

The HEPP will be constructed on the following schedule:

Milestone	Date
Application for Authority to Construct	3/31/01
Application for CEC License	4/6/01
Commencement of Construction	5/15/01
Initiation of Startup	8/2/01
Natural Gas Interconnection	8/15/01
Transmission Interconnection	8/17/01
Commercial Operation	9/1/01

ES.3 PROJECT DESCRIPTION

ES.3.1 Facility Location

The proposed HEPP site is located in Hanford, California. Hanford is located in Kings County. The HEPP site is immediately adjacent to the existing GWF Hanford cogeneration plant just north of Idaho Avenue, between the existing GWF facility to the west and the Burlington Northern & Santa Fe Railway tracks to the east. Refer to Section 1 for the general location map and Section 2 for a plot plan.

ES.3.2 Facility Description

The HEPP will be a nominal 95-MW (annual average conditions) natural gas–fired simple-cycle power plant, with a 115-kV switchyard and approximately 1.2 miles of new 115-kV transmission line. The proposed transmission route is a double-circuit that interconnects with the existing PG&E 115-kV Henrietta-Kingsburg transmission line near the intersection of 11th Avenue and Jackson Avenue, approximately one mile south of the HEPP.

Natural gas for the HEPP will be delivered by the proposed 2.8-mile, 16-inch diameter pipeline along 11th Avenue. Small quantities of water will be required for the HEPP for evaporative cooling of the gas turbine inlet air and for nitrogen oxide (NO_x) control via water injection. Water will be supplied from a well at the existing GWF cogeneration plant with the City of Hanford water supply as a backup. Groundwater use will be mitigated by a local aquifer recharge program. The small quantity of industrial wastewater from the plant (primarily from evaporative cooler blowdown) will be transported from the plant via an existing sewer connection and main to the City of Hanford Wastewater Treatment Plant (WWTP). Domestic water will be supplied from the Hanford municipal water system.

The project expects to operate a maximum of 2,000 hours in 2001 and up to 4,000 hours in subsequent years.

Section 1 includes photosimulations of the HEPP and its associated transmission line. A plot plan and a process flow diagram are included in Section 2.

For the first year of operation, the HEPP will rely on effective combustion and water injection for emissions control, largely because the lead time for design and delivery of post-combustion controls. For the first year, NO_x emissions will be controlled to 25 parts per million by volume, dry (ppmvd) basis corrected to 15 percent oxygen (@ 15% O2) with water injection in the CTG. Carbon monoxide (CO) emissions from the CTG will be 25.1 ppmvd @ 15% O2 and volatile organic compounds (VOCs) emissions will be 2.7 ppmvd @ 15% O2. By February 2002, GWF plans to retrofit each simple-cycle unit with both an oxidation catalyst and a selective catalytic reduction (SCR) system. Following the retrofit emissions will be equal to or less than the limits established under the California Air Resources Board (CARB) simple-cycle Best Available Control Technology Guidelines. NO_x emissions will be controlled to 3.0 ppmvd @ 15% O2 by a combination of a water injection in the CTG and an aqueous ammonia–type SCR system. CO emissions from the CTG will be reduced to 6 ppmvd @ 15% O2 with an oxidation catalyst. VOCs will also be controlled to 2 ppmvd @ 15% O2 with the oxidation catalyst. In addition, GWF will provide offsets for all proposed criteria pollutant emissions from the HEPP.

ES.3.3 Site Layout

See Section 2 for a site layout drawing.

ES.3.4 Transmission Interconnection

The HEPP will interconnect to the existing Henrietta-Kingsburg 115-kV transmission line owned by PG&E. The Henrietta-Kingsburg 115-kV line is located approximately one mile south of the HEPP site and runs east-west along Jackson Avenue.

The proposed transmission interconnection would be an approximately 1.2-mile-long double-circuit 115-kV line that would travel west on Idaho Avenue, then south along 11th Avenue, interconnecting to the existing Henrietta-Kingsbury 115-kV line near the intersection of Jackson and 11th Avenues.

ES.3.5 Fuel Supply

Each CTG will be designed to burn natural gas. Maximum natural gas requirements are approximately 450 million British thermal units per hour (MMBtu/hr) higher heating value (HHV) for each unit.

Natural gas will delivered to the site by the proposed 2.8 mile, 16-inch-diameter pipeline operated by Southern California Gas Company.

ES.3.6 Water Supply

The water requirements for the HEPP will be for evaporative cooling and for water injection in the CTGs to control NO_x emissions and for power augmentation. The HEPP will use an on-site

water supply well at the existing GWF plant for service water. Should the water supply well be out of service for maintenance, the backup service water supply will be from the City of Hanford through an existing connection to the GWF Hanford cogeneration plant. Fire water will be provided by the City of Hanford through an existing connection.

ES.3.7 Waste Handling and Control

Solid waste generated at the HEPP will include small quantities of paper from administration; absorbent materials, packaging, and used parts from operation; and chemical containers, demolition/construction wastes, and other specialized wastes from maintenance. Potentially hazardous waste will be generated during both construction and operation of the HEPP. Hazardous wastes may include contaminated soil; waste oil, solvents and paints; waste SCR catalyst; and other maintenance wastes. Hazardous wastes will be minimized by recycling to the extent possible. Hazardous wastes that are not recycled will be characterized and appropriately treated or disposed.

ES.3.8 Wastewater Line

The HEPP will use the existing wastewater discharge and sewer connection to the City of Hanford sewage treatment plant. The existing line has sufficient capacity to accommodate the discharge from the HEPP. Therefore, no new wastewater line is required.

ES.3.9 Site Access

The HEPP will be accessed from the existing GWF Hanford cogeneration plant entrance on Idaho Avenue. The proposed electric and gas transmission interconnects will be accessible from surface streets.

ES.3.10 Facility Closure

The HEPP will be designed to operate through 2011. Closure procedures will follow a plan that depends on conditions at the time. Those conditions are largely unknown at this time, but closure may include maximizing recycle of facility components; return of unused chemicals to suppliers; equipment draining and shutdown to ensure public health and safety and environmental protection; and the collection, recycling, or disposal of all solid and hazardous wastes.

ES.4 PLANT OPERATION

The HEPP will be operated by existing employees of the GWF Hanford cogeneration plant. The plant will be designed to service peak power demands, operating up to 16 hours per day, 6 days per week, but may operate up to 24 hours a day, 7 days a week depending on the dispatch requirements of the California Independent System Operator. The estimated annual operation for each CTG is 2,000 hours per year (hr/yr) in 2001 and 4,000 hr/yr thereafter.

ES.5 SAFETY

The HEPP will be designed to maximize safe operations. Potential hazards that could affect the facility include earthquakes, floods, and fire. Safe operation will include safety for facility operators, who will be trained to avoid unsafe operating conditions.

Safety and emergency systems will be incorporated into the design and construction of the facility to ensure safe and reliable operation. The HEPP structures will be designed to meet Uniform Building Code (UBC) Seismic Zone 3 requirements. The facility site will be located above the 100-year floodplain. Fire protection systems will include both automatic and manual systems. Worker safety programs will be developed for both construction and operation, and will be implemented to ensure compliance with federal and state occupational safety and health requirements.

ES.6 ENVIRONMENTAL IMPACTS

The HEPP will avoid or substantially reduce potential environmental impacts to insignificant levels through project design and incorporation of proposed mitigation measures.

ES.6.1 Air Quality

The HEPP will result in a net regional air quality benefit based on the inclusion of state-of-the-art control technology and air emission offsets that are greater than the project emissions for both 2001 proposed operation utilizing water injection and subsequent operation conforming to Best Available Control Technology (BACT) requirements using SCR and oxidation catalyst. In addition to the emission offsets required by regulation, GWF will voluntarily offset expected CO emissions to ensure a net air quality benefit. The HEPP CTG will be equipped with BACT to control criteria pollutant emissions. These measures will include clean-burning natural gas, water injection, an aqueous ammonia–type SCR, and an oxidation catalyst. Post-combustion controls will be retrofitted by February 2002.

Emissions sources during construction of the HEPP will be heavy equipment exhaust and fugitive dust from disturbed areas. Water will be routinely applied to minimize fugitive dust emissions. Operational emission estimates are provided for full load operation of the CTG.

The HEPP will trigger offset requirements for NO_x, VOC, SO_2 and PM_{10} emissions. In addition, GWF will voluntarily provide emission reduction credits (ERCs) for the project's CO emissions. GWF has purchased the ERCs necessary to satisfy the applicable ERC emission offset requirements. With this mitigation in place, no adverse impacts to air quality are expected.

ES.6.2 Biological Resources

The HEPP will be located on previously disturbed vacant land in an industrial park. The transmission line route will run along existing roadways. Certain areas in Kings County provide habitat for a number of sensitive plant and animal species. Biological surveys were conducted in the project area in June 1999 and February 2000. The surveys were conducted primarily for federal- and state-listed plant and animal species in accordance with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) approved survey methodologies for sensitive species while concurrently surveying for other special status plant

and wildlife species with potential to occur in the areas. The surveys in area of the HEPP included the 10-acre facility site surrounded by a 500-foot primary buffer area and a one-mile secondary buffer area. The transmission line corridors were surveyed using a method suggested by the CEC that involved a 100-foot corridor centered on the transmission line with a primary buffer area 500 feet on either side of the corridor. A secondary buffer zone, consisting of an additional 500 feet on either side of the primary buffer zone, was also surveyed.

During the surveys, all dens, burrows, and other evidence of special status species were noted. A vascular plant list was complied consisting of all identifiable plant species observed. Sensitive plants and animals were found at or near the proposed cogeneration facilities and associated utility corridors, as listed in Section 8.2. No significant biological resources were identified within the area to be impacted by construction and operation of the HEPP. Consequently, no significant impacts to biological resources are expected.

GWF will provide funds to the Kern Water Mitigation Bank for the purchase of compensation acreage to mitigate any impacts from the small amount of land disturbance resulting from construction of HEPP.

ES.6.3 Cultural Resources

The HEPP will be located and constructed to avoid or minimize, to the extent possible, impacts to all cultural resources. To ensure that such resources are protected from construction damage, a qualified monitor will be available during construction activities to assess the nature and importance of any cultural materials discovered. Construction personnel will be trained in the recognition of cultural materials and will be instructed to immediately halt construction activities in the area of a find upon discovery. In this way, the HEPP's impact on cultural resources will be insignificant.

A records search was requested from the Southern San Joaquin Valley Information Center of the California Historical Resources Inventory System at California State University, Bakersfield. The records search included all previously recorded cultural resources within one mile of the study area. The result of the records search and cultural resources surveys showed that no significant cultural resources exist in the HEPP area that would be impacted by construction and operation of the HEPP. A letter was sent to the Native American Heritage Commissions requesting information on any heritage lands or resources located in the study area. Systematic pedestrian surveys of the study area were also completed in February and March 2000.

ES.6.4 Land Use

The HEPP will conform with all local plans and regulations and is compatible with general land uses in the project area.

The HEPP site is located on a previously disturbed parcel within an existing industrial park. Construction activities at the HEPP will be temporary and will be conducted with minimal interference with existing adjacent land uses. Overall, the land use impacts associated with construction activities will not be significant.

The proposed use of the site is compatible with adjacent land uses, and the operation of the proposed facility is not expected to result in significant adverse impacts to surrounding land uses. Operation of the HEPP represents further development of an area already committed to industrial

uses. The HEPP would not result in a change of land use, nor would it change the existing character of the area.

The proposed route for the transmission line runs along approximately 1.2 miles on Idaho and 11th Avenue. Construction activities associated with the transmission line will be undertaken so as to minimize interference with existing land uses in the transmission line corridor. Structures will be located in a way that reduces conflicts with existing and future land uses. Therefore, no significant land use impacts are identified.

ES.6.5 Noise

Assessment of noise impacts from the HEPP was accomplished through an ambient noise survey performed for the HEPP, evaluation of survey results, and modeling of expected construction and operational noise levels for the HEPP. There are approximately 15 residences located within 1.5 miles of the HEPP site. The nearest residence to the proposed facility is located at the southwest corner of Idaho Avenue and 10th Avenue, approximately 3,200 feet from the site. The next nearest residences are located along both sides of 10th Avenue between Jackson and Iona Avenue, approximately 3,900 feet from the HEPP site. Ambient noise levels at both the proposed HEPP site boundary and the nearest residents are below significant levels.

Noise levels expected from the operation of the proposed facility will be reduced by noise abatement features incorporated as standard equipment (e.g., acoustic enclosure and inlet air and exhaust silencers for the CTGs). Compared to the ambient noise levels measured at nearby residences, noise from the operation of the proposed project is expected to be inaudible during all but the quietest periods. No significant noise impacts are expected from the operation and maintenance of the HEPP plant and the transmission line.

Construction noise impacts should be typical of power plant construction activities, with the primary noise sources being associated with equipment and vehicles. Construction noise is not expected to be audible at the nearest residences. Construction equipment will be equipped with appropriate mufflers or silencers to reduce noise levels.

Off-site noise levels associated with the HEPP are not expected to be significant or require further mitigation beyond the measures already identified and incorporated into the project. After commencement of operation, GWF will conduct an additional ambient noise survey to demonstrate that the HEPP conforms with applicable city standards.

ES.6.6 Public Health

The HEPP will utilize clean-burning natural gas and state-of-the-art combustion technology to minimize potentially toxic air emissions. Criteria pollutant emissions from the HEPP will meet pertinent federal and state ambient air quality standards that have been set at levels designed to protect public health. Therefore, no significant adverse health effects from criteria pollutant emissions are anticipated.

Energized electrical conductors produce electric and magnetic fields at the transmission line that will drop off exponentially with distance away from the transmission line. Current knowledge on this subject indicates that the electric and magnetic field levels expected at the edge of the transmission line right-of-way will not present a health risk.

ES.6.7 Worker Health and Safety

The construction, operation, and maintenance activities associated with the HEPP may expose workers to physical and chemical hazards. However, worker exposure to these hazards will be minimized through adherence to appropriate engineering design criteria, implementation of appropriate administrative procedures, use of personal protective equipment, and compliance with applicable health and safety regulations. Such practices are already in place at the existing GWF Hanford cogeneration plant.

The HEPP site will become the fire protection responsibility of the City of Hanford Fire Department Station No. 2, which is located approximately 1.5 miles north of the proposed HEPP site. This location allows for a rapid response time. The on-site fire suppression system will be placed in service as early as practicable. Applicable fire suppression plans will be submitted to the City of Hanford for review. An emergency action plan will be developed to designate responsibilities and actions to be taken in the event of an emergency during construction of the facility. Additional written safety programs will include but not be limited to hazard communication standards, a hearing conservation program, a respiratory protection program, heavy equipment procedures, hot work procedures, and others. A plan already exists for the existing GWF Hanford cogeneration plant. That plan will be amended to incorporate the HEPP.

On startup of the HEPP, the construction health and safety programs will transition into an operations and maintenance program. The primary mitigation measures for worker hazards during normal facility operation and maintenance will be contained in the Injury and Illness Prevention Plan. Fire protection will involve physical measures, such as sprinklers, water supplies, and fire extinguishers, as well as fire prevention measures. The HEPP will have a site-specific Emergency Action Plan that addresses potential emergencies, actions, and responsibilities. Additional written safety programs will be developed as components of the overall operation and maintenance health and safety plan for the HEPP.

The HEPP will ensure the safety and well-being of all workers participating in construction and operation of the project. Systems will be implemented to ensure that workers possess the necessary information to recognize hazards and protect themselves from these hazards.

ES.6.8 Socioeconomics

The HEPP will have a positive impact on the fiscal resources in the region. The project will bring both sales tax and property tax revenues to the city and county in addition to construction payrolls. Operating payrolls will not be impacted because the HEPP will not require any additional workers.

The HEPP construction is expected to last three months and will provide short-term job opportunities. There appears to be sufficient supply of labor for this project through unions and contractors in nearby Fresno County and Kern County. The peak construction period for the HEPP is not expected to overlap with the peak construction demands of other projects planned in the area. Therefore, the HEPP is not expected to cause significant cumulative impacts on the availability of construction labor.

The construction and operation of the HEPP will not have a significant adverse impact on law enforcement, local fire and emergency, medical, utilities, or education services.

ES.6.9 Agriculture and Soils

The HEPP will not cause significant impacts to agriculture or soils. The HEPP is located in an existing industrial park, where disturbance of soils has already occurred.

During excavation of the HEPP site and before compacting and grading, the soils will have susceptibility to erosion. However, compacting and other construction mitigation measures will reduce the potential for erosion. Grading operations and construction activities will meet county and state grading requirements and storm water best management practices.

ES.6.10 Traffic and Transportation

At the HEPP, construction activities will add a moderate amount of traffic during the peak construction period. However, the increase in traffic will be minor compared to the existing roadway capacity. No significant degradation in the roadway level-of-service is anticipated during construction of the HEPP. Therefore, the impact from construction of the HEPP is not considered significant.

Operation and maintenance-generated traffic for the HEPP will not be significantly increased above existing plant levels, as there will not be an increase in the number of workers traveling to and from the site each day. (The HEPP will be operated and maintained by staff at the existing GWF cogeneration plant.) Potential long-term traffic impacts associated with operation of the HEPP include delivery of hazardous and nonhazardous materials and hauling of wastes generated during operations. These operations-related traffic increases would be minimal. Regional and local roadways have adequate capacity to accommodate operations-related traffic. Traffic related to operation of the transmission line would be limited to preventive maintenance vehicles and repair vehicles required in the event of damage to the lines. Therefore, traffic impacts during operation of the HEPP are also considered to be insignificant.

ES.6.11 Visual Resources

Visual resources would not be significantly impacted by the HEPP. The HEPP will be located in an area already impacted by industrial development. All facility lighting will be hooded and directed on-site. Because of the project's overall consistency with existing conditions in the project's vicinity, impacts on existing and future visual resources are considered minimal and therefore less than significant.

ES.6.12 Hazardous Materials Handling

The HEPP will implement numerous accident prevention and mitigation measures to reduce the risk associated with use and storage of hazardous materials. The quantities of hazardous materials stored or used on-site will be evaluated to determine which exceed threshold levels for federal and state risk management and process safety requirements. Plans and programs are already in place at the existing GWF Hanford cogeneration plant and these programs will be expanded to include the HEPP. The current programs include hazard assessments, prevention programs, emergency response programs, and process management systems. Although risk cannot be completely eliminated, engineering and procedural features will effectively reduce the possibility and potential consequences of a release.

A number of hazardous materials and one extremely hazardous substance will be used and/or stored on-site during operation of the HEPP. The hazardous materials include insulating and lubricating oils, corrosion inhibitor, detergents, ethylene glycol, carbon dioxide, and hydrogen. The extremely hazardous substance is aqueous ammonia, which will be used in the SCR system for NO_x control. The HEPP will use the existing aqueous ammonia tank in the adjacent GWF cogeneration plant. The ammonia tank is currently surrounded by a secondary containment structure sized to hold the entire contents of the tank. In addition, the containment area will be filled with plastic spheres that will serve to reduce the exposed surface area in the unlikely event of an aqueous ammonia spill. Personnel protective equipment will be available for emergency response personnel. The evaluation of plausible release scenarios indicates that the likelihood of a release is too small to be considered significant.

On-site storage of hazardous materials will be minimized. Equipment and containers will be located inside concrete containment berms. All hazardous materials will be handled and stored in accordance with applicable codes and regulations, including the California Fire Code and the Uniform Fire Code. Incompatible materials will be stored in separate storage containment areas. Areas susceptible to potential leaks and/or spills will be paved and bermed. Piping and tanks will be protected from potential traffic hazards by concrete or other barriers.

ES.6.13 Waste Management

Nonhazardous and hazardous wastes generated by the HEPP during both construction and operation of the facility will be recycled to the extent possible. Typical wastes include sanitary wastewater, nonhazardous solid and liquid waste, and hazardous solid and liquid waste. When properly handled, both nonhazardous and hazardous waste will not significantly affect the environment or human health.

The nonhazardous waste generation and disposal from the HEPP will not significantly decrease the capacity of the waste disposal facilities identified as available for use by the project. With active recycling efforts in place, and the currently available Class II or III waste disposal capacity in Kings County, the incremental waste disposal capacity needed by the project is insignificant.

Similarly, the hazardous waste generation and disposal from the HEPP will be minimized by recycling and will not significantly decrease the capacity of Class I hazardous waste disposal facilities used by the project.

ES.6.14 Water Resources

The HEPP will have a minimal impact on freshwater resources because the project will not withdraw a significant quantity of water from the local aquifer. The HEPP extraction will represent approximately <0.01% of the current groundwater extraction rate. However, it is recognized that the aquifer currently experiences overdraft conditions. To fully mitigate the HEPP groundwater extraction, GWF will purchase surface water and make it available for local aquifer recharge. With this mitigation in place, groundwater impacts from the HEPP will be insignificant. The City of Hanford will provide backup supply for the service water for the HEPP. Because the City will only be providing a backup water supply, there will be no impact on the City's water supply operations.

Best management practices, drainage control, and erosion and sediment control will be implemented to minimize surface water impacts during construction. During construction, existing roadways will be used.

ES.6.15 Geologic Resources and Hazards

The HEPP will not adversely affect geologic resources of recreational, commercial, or scientific value. The HEPP will be designed to conform with the requirements for UBC Seismic Zone 3. The surface and subsurface geologic units are not unique and the potential for encountering rare mineral or fossil occurrences is very low. In addition, the HEPP site has been previously disturbed by historical agricultural activities and the transmission line route is close to, or within, rights-of-way of existing roadways. No significant impacts to geologic resources are expected.

ES.6.16 Paleontological Resources

The literature and archival reviews and the field survey documented fragmentary fossil bone specimens that could not be identified. Paleontologic monitoring will be conducted to ensure that paleontologic resources are not adversely affected by the earth-moving associated with the construction of the HEPP. No impacts to paleontologic resources are anticipated during the operation of the HEPP. Also, no impacts are associated with construction, operation, or maintenance of the HEPP transmission line.

ES.7 CERTIFICATION

GWF Power Systems Company, Inc., certifies that the material contained in this filing is true and accurate to the best of our knowledge.

ES.8 ORGANIZATION OF THE DOCUMENT

This document is organized to correspond numerically with each of the items requested in the *Emergency Siting Process Application Checklist*. A copy of the completed checklist follows, including reference to the location where the requested information can be found in this document. Each section contains a narrative response to the questions on the checklist. In many cases, reference has been made to material prepared in support of the recent application for a Small Power Plant Exemption (SPPE) for the Hanford Energy Park. Referenced material has been included at the end of each numbered section as exhibits. To simplify the presentation of exhibit material, figures referenced within the exhibit documents have been omitted and may appear as blank pages in the exhibit. A complete copy of the application for SPPE for the Hanford Energy Park, including all of the figures, can be located in CEC Docket 00-SPPE-1.