

DOCKETED

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Comment Received From: Ngiabi Gicuhi

Submitted On: 8/12/2016

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AES Application for Certification

Additional submitted attachment is included below.



PLAINS
West Coast Terminals LLC

August 12, 2016

Michael D. Lewis
Division Chief Siting
Transmission & Environmental Protection Division
California Energy Commission
Dockets Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 13-AFC-01

Dear Mr. Lewis:


I am writing on behalf of Plains West Coast Terminals LLC ("Plains") to provide comments on the Preliminary Staff Assessment for the Alamitos Energy Center Supplemental Application for Certification. Plains comments are as follows:

1. There are several references to "formerly Plains West Coast Terminals", please revise to "Plains West Coast Terminals".
2. Under the "Engineering Assessment" or other suitable "Construction" discussion section the PSA should address:
 - a. If the (Displacement Oil) DO tank basin is modified, we will need to ensure the new proposed containment has adequate storage for 110% of the tank capacity, or the tank capacity, plus a 25 year, 24-hour storm event, whichever is greater.
 - b. Construction activity will affect Plains West Coast Terminals storm water quality draining to Outfall 3. Recommend that AES incorporate the eastern earthen lot (that they hope to lease from Plains for construction) between our tank farm and San Gabriel River into their Construction Storm Water Permit. Please provide us with the detail BMPs they will use to protect discharges through Outfall 3.
3. Need to maintain unhindered site access to our facilities for our personnel and emergency responders during construction of AEC facility.
4. Need to protect pipelines and equipment from excavation and/or heavy equipment loading during construction activities.
5. Need to determine if pipeline relocations are required and if so financial responsibilities for doing so.
6. Need to have access to pipelines for future maintenance activities.
7. Need facility security during construction activities.

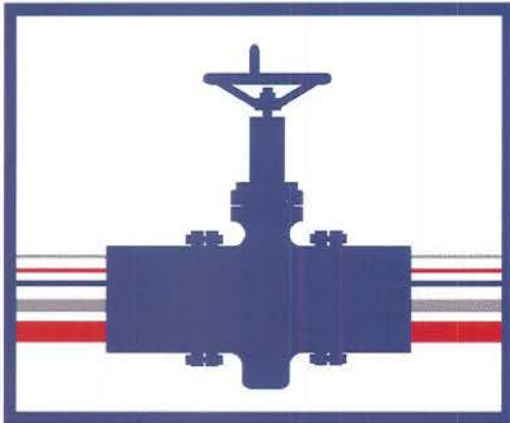
8. Laydown area agreement with AES would need to be executed.
9. Reimbursement Agreement for Plains Engineering review and Field Inspection.
10. In the unlikely event AES wanted to use Plains' back gate, a security guard would need to be stationed at the site.
11. Plains' inspector/guard representatives' fees will need to be paid by AES.
12. No hot work within 100 feet of manifolds/tanks.
13. There are currently two intake channels used to supply water to the AES facility. Plains understands, on completion of the project, AES will no longer utilize this water supply. Plains has pumping facilities within 100 feet of one channel and a pipeline that crosses the other channel. Request that both channels be refilled.

Please contact me at (562) 728-2358 if you would like to discuss any of these issues.

Sincerely,


for Ngiabi Gicuhi

Attachment



**PLAINS ALL AMERICAN PIPELINE, L.P.
AND ITS AFFILIATED COMPANIES**

**GENERAL REQUIREMENTS FOR CROSSING
PLAINS ALL AMERICAN PIPELINE, L.P. PIPELINES
(October 6, 2005)**

We appreciate the opportunity to work with you and your company in the early planning stages of your development activity. Plains All American Pipeline, L.P. ("Plains") has several affiliated pipeline companies in different geographic areas which do business as Plains Pipeline, L.P., Plains Marketing, L.P., Plains LPG Services, L.P., **Pacific Pipeline System LLC**, and **Plains West Coast Terminals LLC**. These General Requirements apply to all pipelines owned or operated by all of Plains' affiliated companies.

Working together and following our pipeline safety requirements will help:

- Protect the safety of your employees, the environment and the surrounding community;
- Reduce the risk of damage to our pipeline and related facilities;
- Ensure an adequate work area for future pipeline maintenance and/or repair work;
- Enable effective corrosion protection for our pipeline; and
- Minimize any conflict that may arise.

AT NO COST TO THE CONTRACTOR, A PLAINS REPRESENTATIVE WILL ERECT TEMPORARY FLAGS MARKING THE PIPELINE LOCATION AND SHALL BE PRESENT DURING ALL ACTIVE WORK PERIODS TO OBSERVE EXCAVATION OR OTHER CONSTRUCTION ACTIVITIES NEAR THE PIPELINE.

ANY WORK PERFORMED NEAR THE PIPELINE WITHOUT THE PRESENCE OF A PLAINS REPRESENTATIVE WILL NECESSITATE THAT THE PIPELINE BE EXPOSED FOR INSPECTION AND NEEDED REPAIRS PERFORMED AT THE CONTRACTOR'S OR RESPONSIBLE PARTY'S COST.

DESIGN AND CONSTRUCTION

1. **ALL PIPELINES, UTILITY LINES** and other underground facilities constructed across Plains owned or operated pipeline must be installed with a minimum vertical separation of 24 inches between structures. All facilities crossing a Plains pipeline shall be made of, or encased in, steel pipe with threaded or welded joints the entire width of Plains' right of way. Horizontal separations will be determined on a case-by-case basis. Electrical conduit and cables are excluded, please refer to paragraph 2. All work and cleanup will be conducted in a manner acceptable to Plains' on-site representative.
2. **ALL UNDERGROUND ELECTRICAL CABLES** shall be installed with a minimum vertical separation of 24 inches between structures with all plans, work and cleanup conducted in a manner acceptable to Plains' on-site representative. Horizontal separation will be determined on a case-by-case basis. In addition, the electrical cable must be enclosed in conduit (steel or Schedule 80 PVC). It should be covered with **red** reinforced concrete with a minimum width of 6 inches on each side and above the conduit, for the entire width of Plains' right of way.
3. **ALL UNDERGROUND FIBER OPTIC CABLES** shall be installed with a minimum vertical separation of 24 inches between structures with all plans, work and cleanup conducted in a manner acceptable to Plains' on-site representative. Horizontal separation will be determined on a case-by-case basis. In addition, the fiber optic cable must be enclosed in conduit (steel or Schedule 80 PVC). It should be covered with **red** reinforced concrete with a minimum width of 6 inches on each side and above the conduit, for the entire width of Plains' right of way.
4. **ALL PROPOSED ROADS, STREETS, OR DRIVEWAYS** shall be constructed with a minimum cover of 48 inches, including the sub-grade, as measured from the top of the Plains pipeline to the bottom of the pavement (road, street, or driveway) outlined below. If a Plains pipeline will require adjustment to accommodate a roadway, street, or driveway crossing, the cost of any such lowering or relocation shall be borne by the party or parties requesting the adjustment. With each request involving roads, streets, or driveways, Plains will reserve the right to excavate to expose and inspect its pipeline(s) to determine the need for pipe replacement, full encasement, or heavy wall pipe. The cost of this activity will be at the expense of the requesting party.
 - A. PIPELINE MINIMUM COVER REQUIREMENTS
 1. 48 inches from bottom of pavement under a road, street or driveway to the top of Plains' pipeline.
 2. 36 inches under all other surfaces to the top of Plains' pipeline.
 - B. Any concrete paving (other than for road, street or driveway crossings of a Plains pipeline) i.e. a parking lot should it be approved to be constructed over

the Plains' pipeline by a Plains representative shall (a) be reinforced, (b) not exceed 4 inches in thickness, (c) be sectioned in 10 foot by 15 foot panels (15' dimension shall be perpendicular to the pipeline) with appropriate expansion joints, (d) containing lifting rings, and (e) conform to the minimum cover requirements stipulated above.

C. Plains shall have the right to cut and remove any pavement or other surface structures now or hereafter located over or across a Plains pipeline, without prior notice or any obligation to repair, replace, resurface or dispose of removed material, for the purpose of exercising any rights granted to Plains under the pipeline rights of way and easements.

5. **ANY DRAINAGE DITCHES** shall be constructed with a minimum cover, and measured from the lowest point in the ditch, to the top of pipe as follows:

1. Concrete lined – 12 inches.
2. Unlined – 36 inches.

Any drainage canals shall be constructed with a minimum of 60 inches of cover below the ultimate flow line.

6. **TEMPORARY (HAUL) ROAD** crossings shall be constructed with a minimum ground cover (as measured from the surface of the road to the top of the pipeline) of **5-feet**. A temporary earthen berm may be constructed to meet this requirement. Where it is necessary for heavy equipment to cross the pipeline, additional measures may be needed to effectively distribute the weight of such equipment, for example, installing additional cover, timber matting and/or a temporary bridge for passage over the pipeline.

7. **LAKES OR OTHER BODIES OF WATER** shall not be constructed over the pipeline or within the boundaries of the pipeline easement. Additionally, the surface cannot be developed or changed in any way that would cause rainwater or runoff to collect on the pipeline right-of-way.

8. **DIRECTIONAL DRILLING OR BORING** shall require additional damage prevention measures, whether installing a crossing or otherwise conducting such operations within **25-feet** of the pipeline. It is Plains' option whether peepholes or sheet piling be installed to an elevation lower than the pipeline, before drilling/boring to help ensure its protection. Plains requires continuous tracking of the drilling head as well as using a physical technique (such as probing) to ascertain the exact location of the head before it crosses the Plains pipeline. Plains may also require that the pipeline be exposed when near drill/bore entry or exit points.

9. If Plains determines it is necessary to lower, encase or otherwise adjust a Plains pipeline because of the landowner's (developer's, etc.) construction activity, the

landowner or developer shall reimburse Plains for the cost of lowering, encasement or other adjustments.

10. Please notify Plains' Maintenance Supervisor George Gooch in Long Beach, California at (562) 728-2325 at least two (2) business days prior to commencing any excavating or construction activity in the vicinity of any Plains pipeline. **California One-Call must also be notified before starting any excavation or construction activity.** If you are unable to contact the above Plains representative, contact the Pipeline Control Center in Midland, Texas, and the information will be relayed.

Pipeline Control Center
24 Hours
(432) 686-9312

11. No excavating or construction activity shall be conducted within 25 feet of any Plains pipeline or related facility in the absence of a Plains representative. All plans that are submitted to Plains for approval shall have the two phone numbers above, along with the two (2) business days notice of commencement, imprinted on plans.
12. Any contractor, developer, geophysical entity etc., planning blasting operations within 500 feet of any Plains pipeline or facility shall submit a blasting plan to Plains for approval. This plan will include hole depth, diameter, spacing, burden, delay times, maximum charge weight per delay, sequence, explosive type and blast zone relative to the Plains pipeline or facility. Under NO circumstances will blasting or seismic shot holes be allowed within 100 feet of any Plains pipeline.
13. No signs, billboards, monuments, buildings, power poles, structures, manholes, parking lots, shrubbery, or trees shall be located within a Plains right of way and easement area so that the pipeline can be maintained without damaging these structures or being impeded by them.
14. No excavation shall be made on land adjacent to any Plains pipeline which will in any way impair, withdraw lateral support, cause subsidence, create the accumulation of water, or cause damage to the Plains pipeline right of way.
15. No fence shall be placed across a Plains right of way without written permission from Plains. If fences are permitted, 14-foot gates must be installed on the right of way, and keys to any installed locks shall be provided to Plains.
16. Side cutters shall be removed from the bucket of excavation equipment, and a bar shall be installed across the teeth during excavation in the vicinity of any Plains pipeline.
17. No paving is to be placed over any Plains right of way without prior written permission from Plains.

18. Any damage to existing Plains pipelines, facilities, pipeline insulation and/or coating, casing, markers and/or signs, test leads, vent pipes, fences, gates and/or any other associated pipeline apparatus resulting from the installation, construction, maintenance or operations of any third party facilities crossing Plains' pipelines shall be repaired to Plains' satisfaction or replaced at the sole cost and expense by the responsible party within 15 days after the damage has occurred.

19. All written requests should be supported with plans and forwarded to:

Attn: Manager, Land and Contracts
Plains All American Pipeline, L.P.
5900 Cherry Ave.
Long Beach, CA 90805