

DOCKETED

Docket Number:	87-AFC-01C
Project Title:	COMPLIANCE-Luz Solar Electric Generating System Cogeneration AFC (150 MW) Units III-VII.
TN #:	237657
Document Title:	Report of Conversation - SEGS III-VII Evaporation Pond Decommissioning
Description:	Conversation between Mike Conway, Abdel-Karim Abulaban, and Geoff Lesh of the CEC and John Steude of the Lahontan Regional Water Quality Control Board.
Filer:	Marichka Haws
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**Siting, Transmission
and Environmental
Protection Division**

FILE:

PROJECT TITLE: SEGS III-VII

Docket: 87-AFC-01C

TECHNICAL AREA(S): Soil and Water Resources

Telephone

(Teams Online)

Meeting Location:

NAME: Mike Conway, Abdel-Karim
Abulaban, and Geoff Lesh

DATE: April 20, 2021

TIME: 2:00 pm

WITH: John Steude of the Lahontan Regional Water Quality Control Board

SUBJECT: SEGS III-VII Evaporation Pond Decommissioning

COMMENTS:

Staff held a meeting with John Steude of the Lahontan Regional Water Quality Control Board (Water Board) to discuss the proposed decommissioning of the evaporation ponds at the Solar Energy Generating System III-VII (SEGS III-VII) project. The SEGS III-VII evaporation ponds are permitted to operate according to Waste Discharge Requirements (WDR) (Order #6-97-58). These requirements specify how the ponds shall be operated and monitored by the owner to ensure adequate protection of water quality. Staff wanted to learn about the expected timeline for decommissioning the evaporation ponds and, about how the post-closure monitoring of the ponds would be incorporated into new WDRs. New WDRs are expected to be necessary for operation of the planned landfill which would be converted from one of the three existing evaporation ponds.

Mr. Steude described how the solid waste at the three existing ponds at the SEGS III-VII project would be consolidated into the pond that would be converted into a landfill as part of the closure process. The existing groundwater monitoring required for the ponds by the existing WDRs would continue into the closure phase of pond operation. The existing requirements for monitoring of the ponds are expected to be transitioned into new WDRs which will apply to the planned landfill. The planned landfill would also contain some types of nonhazardous solid waste, including Heat Transfer Fluid (HTF) contaminated soils, if any still exists during the landfill construction phase, as well as residual solid wastes recovered during site decommissioning, including waste products from the site's existing Land Treatment Unit (LTU) and Bioremediation Unit (BU) (WDR Order #6-95-102). The facility expects to clean-close the LTU and BU's by treating any remaining HTF contaminated soils so will not likely need to put any HTF soils in the landfill.

Mr. Steude indicated that the Water Board process for adopting new WDRs would take approximately six months. The six-month process would begin when the Water Board receives a deemed-complete Report of Waste Discharge (ROWD) application and would end when the Water Board members vote to issue new WDRs. Currently, the Water Board has not yet received a new ROWD from the SEGS III-VII owners for the planned landfill.



Mr. Steude assured staff that the processes described above would proceed independently of coordination with the Energy Commission. The Water Board has a responsibility to issue closure and post-closure waste discharge requirements for the existing SEGS III-VII evaporation ponds all the way through their closure, during construction of the proposed landfill, and during the closure and post-closure monitoring period for the proposed landfill. The proposed landfill is essentially closed as soon as it is constructed and does not have an operational period. The proposed landfill will be required to be monitored and maintained until the waste no longer poses a threat to water quality. When the waste is deemed by the Water Board members to no longer pose a threat to water quality, the post-closure monitoring period for the landfill will end and the closure and post-closure waste discharge requirements will be rescinded.