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Mojave Solar New Ponds Project- Segment 001

Additional submitted attachment is included below.



Petition To Amend

New Ponds Project

Mojave Solar Project

NO: 09-AFC-05 12-22-2023

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1 Definitions

A-E	Alpha East Pond
A-W	Alpha West Pond
B-E	Beta East Pond
B-W	Beta West Pond
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
COCs	Conditions of Certifications
GEN-1	General Condition
HAI	Hushmand Associates, Inc.
LORS	Laws, Ordinances, Regulations, and Standards
AMSP	Abengoa Mojave Solar Project
MDAQMD	Mojave Desert Air Quality Management District
MS	Mojave Solar
MSP	Mojave Solar Project
РТА	Petition to Amend
РТО	Permit To Operate
TAC	Toxic Air Contaminant

2 Summary

Mojave Solar LLC (MS) is submitting this petition for a post Certification Amendment of the Abengoa Mojave Solar Project (AMSP), Docket 09-AFC-5. The following changes are included in this petition:

In order to facilitate the pond's maintenance and enhance its storage capacity, MSP is proposing to construct one new evaporation pond at each plant (A-3 and B-3).

This Petition to Amend (PTA) is filed to make the changes necessary to final design approved by the California Energy Commission (CEC) in accordance with California Code of Regulations (CCR) title 20, section 1769 (a)(1).



3 Organization of the Petition

This petition for post certification license modification (Petition) is based on the requirements of Title 20, California Code of Regulations (CCR), section 1769(a), describing the contents of post certification amendments. The Petition provides the following:

- A complete description of the modifications, including new language for any conditions that will be affected.
- A discussion of the necessity of the proposed modification.
- An explanation that the modification was not known at the time of the certification.
- An explanation that the information was not known, and why the change should be permitted.
- An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts, if appropriate.
- A discussion of how the modification may impact the facility's ability to comply with applicable laws and regulations.
- A discussion of how the modification affects the public.
- A list of property owners potentially affected by the modification; and
- A discussion of the potential effect on nearby property owners, the public and parties in the application proceedings.

This petition is based on MS's determination that environmental impact concerns of the Construction of New Ponds Project would not differ substantially from the original project approved in September 2010.

4 Project Location

Mojave Solar LLC (MS) owns Mojave Solar Project, an operating 250 megawatt (nominal MW) concentrated solar project at 42134 Harper Lake Road, Hinkley in San Bernardino County, California. The facility includes two (2) evaporation pond areas, Alpha Pond area located north of the site and Beta Pond area in the southern part of the site. Each pond area has two (2) ponds (east and west ponds) and four (4) sumps, two (2) in the east pond and two (2) in the west pond. The Alpha and Beta Pond systems are identical. There are three (3) pipe runs at each pond, each about 717 feet long. Thus, for the four (4) ponds at the Mojave Solar Project, there are twelve (12) pipe runs, approximately 8,604 feet in total length. These ponds were designed and constructed as part of the plant construction project in 2012 and 2013. Each pond excluding the slopes is 312 ft x 294 ft in the plan area. By adding the slopes, pond dimensions will increase by about 50 to 60 ft. The depth of the ponds is about



15 feet, but they are not full to the top. The ponds are currently in service and are partially filled with the Water Treatment Plant RO Waste Discharge.



Figure 4-1: Aerial View of the Mojave Solar Project and Surrounding Area



Figure 4-2: Site Plan

Atlantica Sustainable Infrastructure



Figure 4-3: Alpha Plant Layout



Figure 4-4: Beta Plant Layout



5 Facility Permitting Background

The MSP was certified by the CEC with a Final Decision on September 8, 2010, and began commercial operation on December 24, 2014. Some of the subsequent amendments made to the COCs in the Final Decision are described below:

- On June 27, 2016, MS proposed use of evaporators at Evaporation Ponds, SWAT02-15-00 and received approval for installation of the evaporators on March 2, 2017. (SWAT02-16-00)
- On February 13, 2020, MS submitted the proposal for Carbon Absorption System Improvement, upon CEC approval the modification was completed on February 26, 2021.
- On January 28, 2020, MS filed a petition (TN231771) for the construction of new warehouse building, which was approved on February 13, 2020, and the construction completed on September 24, 2020.
- On January 13, 2022, MS filed a petition for a post certification change (TN#241162) with the California Energy Commission (CEC) for the MSP to install a hydrogen generation system, including an electrolyzer that uses electricity from MSP to decompose demineralized water into hydrogen and oxygen. The change was approved on June 13,2022; Order No: 22-0608-4. This change is still on the construction phase and the unit has not been installed yet.
- On November 29, 2023, MSP filed a petition (PT 253380) to extend the existing pond's capacity. The petition is under review as of 12/22/2023.

6 Description of Proposed Change

6.1 Mojave Solar New Ponds Project Overview

The evaporation ponds have been receiving wastewater since August 2014 to date. The depth of the wastewater has tended to increase year over year and the evaporation rate has been decreased gradually due to the nature of the water evaporation which increases the salt concentration at the ponds and effects the evaporation rate. In addition to above, the netting installation over Beta West Pond (B-W) has shown a significant decrease of the natural evaporation as well as preventing MSP to utilize the use of the sprayers in the netted ponds resulting rapid increase of the B-W pond's level. Since all other ponds must be netted by April 2024, MSP foresees the need to build an additional evaporation pond per plant to secure its operation and to optimize the existing ponds maintenance plan.



6.2 Basis of Design for New Evaporation Ponds

The design's intent is to replicate the existing evaporation pond design to the extent practical and consistent with current pond liner systems, with the exception of perimeter fencing around the new ponds. Given that the new ponds will be netted, the installation of perimeter fencing would not be necessary. The existing Alpha and Beta Evaporation Ponds were constructed in 2012. HAI has prepared design plans for the construction of a new Alpha and new Beta Evaporation Pond. The ponds follow much of the same design as the original approach utilizing a containment system of a lower 40-mil HDPE geomembrane, geonet interstitial drainage layer, and upper 60-mil HDPE geomembrane. Review of the geotechnical information provided by Ninyo & Moore (2009) indicates that conventional earthmoving equipment will be able to excavate and process the materials for use in the construction of the earth fills and grading for the project. The ponds will include a leak detection system for detecting and collecting liquids between the liners that are essentially the same as the existing evaporation ponds. The design includes neutron probe monitoring beyond the liner system. The basic design criteria included:

The size of each pond should be roughly 250,000 sf – similar to the existing ponds.

- 1- The depth of each pond should be nominally 10 feet, which includes the 2 feet of freeboard this is also similar to the existing ponds.
- 2- The liner system shall include a lower 40 mil high-density polyethylene (HDPE) geomembrane, interstitial leak collection geonet, and upper 60 mil HDPE geomembrane. With the exception of using black conductive geomembrane (vs. white), the liner system is the same as existing ponds.
- 3- The leak detection sump, piping and manhole system is the same as existing ponds.
- 4- Neutron probe test pipes and ground water detection monitoring wells will be installed for enhanced monitoring for leaks, consistent with the existing ponds.
- 5- From a constructability perspective, the design of the ponds was graded in an attempt to balance the amount of cut and the amount of fill to reduce overall construction costs and exporting of material to a stockpile.

Refer to the design memorandum in Appendix 10.1.

6.3 Technical Specifications and CQA Plan

HAI has prepared Technical Specifications and a CQA Plan for the construction of the new ponds. The Technical Specifications, in conjunction with the execution of the CQA Plan, will ensure that the project is completed in accordance with the intent of the design plans and meets industry standards for the materials used in the construction. Appendix 10.2 and Appendix 10.3.

6.4 Construction Schedule



MSP plans to start the construction of Alpha A-3 pond in early 2024 and, Beta B-3 in January 2025.

6.5 Necessity of the modification

The modification is necessary to adapt to the decrease in evaporation rates in the ponds caused by the installation of netting over them. This adjustment will provide sufficient storage capacity, allowing MSP to continue operating the plant. Without the modification, electricity production at the plant may be interrupted during the summer of 2024.

6.6 Why the change should be permitted.

The proposed change should be permitted to allow MSP to continue providing electrical energy using clean, renewable energy. This change will enable MSP to maintain reliable operation and provide sufficient storage capacity for future pond maintenance. The proposed modification ensures the protection of environmental resources, striking a balance between the needs of both the human and natural environment. the needs of both the human and natural environment.

6.7 Proposed Changes to the Conditions of Certification

COMPIANCE-14 The project owner must petition the Energy Commission pursuant to Title 20, California Code of Regulations, section 1769, in order to modify the project (including linear facilities) design, operation or performance requirements, and to transfer ownership or operational control of the facility.

SOIL&WATER-2 Any changes to the design, construction, or operation of the ponds, treatment units, or storm water system shall be requested in writing to the CPM, with copies to the Lahontan RWQCB, and approved by the CPM, in consultation with the Lahontan RWQCB, prior to initiation of any changes.

7 Potential Environmental Impacts

7.1 Air Quality

The proposed change will generate short-term construction emissions, including fugitive dust and construction equipment combustion emissions. The project's construction duration will be 4 months per pond, with excavation of 31,000 cubic yards of soil for Alpha Pond and 38,000 cubic yards for Beta Pond. Dust suppression will be performed during the project using water trucks.

The estimated crew size is 10-15 employees, and common construction equipment will be used during the project; however, the equipment list is not currently available to MSP.

Any construction-related emissions will be temporary for the duration of the construction, and there will not be any significant impact after the project's completion.

7.2 Biological Resources



The proposed project components will be added within the existing facility footprint, with no conversion of habitat from its natural condition. Consequently, no direct impacts to biological resources or wetlands resulting from habitat changes have been identified.

7.3 Cultural Resources

The research conducted by MSP's consultant in August 2006 revealed, based on background research and field efforts, that the total cultural resources inventory for the project area includes 40 identified resources within the area of analysis. However, no CRHR-eligible resources were found within the AMS project area.

The potential impact of the project on cultural, paleontological, and historical resources was evaluated by the Commission and the applicant prior the plant construction and necessary mitigations were then implemented through Conditions of Certification to reduce these impacts to a less significant level.

The proposed project will be located within the existing facility. The new Alpha Pond site has not been disturbed previously, while the new Beta Pond will be constructed on the site of the Mirror Assembly Building. This building was temporarily used during construction as the construction shop.

The implementation of Conditions of Certification CUL-1 through CUL-7 will effectively reduce any potential excavation-related impacts to a level deemed less than significant.

7.4 Geological Hazards and Paleontology Resources

The geological study, conducted during the initial plant design, assessed the potential geologic hazards to the project were effectively mitigated by standard engineering design measures as specified in Conditions GEN-1, GEN-5, and CIVIL-1 of the Facility Design section of the Decision.

Gannet Fleming evaluated flood risks during the plant's initial design. As a preventive measure, the construction of retention basins was constructed to collect storm runoff near the evaporation ponds, thereby preventing runoff from reaching the ponds. At the Alpha Plant, an additional retention basin will be constructed on the east side of the new pond to collect stormwater from that side.

Furthermore, each pond will be excavated according to the grades shown in the plans, and the excavated soil will be used to create engineered fill around the pond. A berm will be constructed to prevent stormwater runoff from entering the evaporation pond. With the Conditions of Certification in place, the project adheres to applicable LORS related to geological resources.

The Paleontological Resources recommends at depths of 2 feet below the surface, mass grading, deep foundation excavation, and utility trenching that penetrates underlying undisturbed soils holds a high potential for exposure of paleontological resources, until determined otherwise by the project paleontological resource specialist. As the new ponds



necessitate excavation at the depth of 2 feet below the surface, paleontological monitoring, consistent with the Conditions of the Commission Decision, will be rigorously followed.

7.5 Efficiency and Reliability

The proposed project is anticipated to have a positive impact on the efficiency and reliability of MSP by providing additional storage capacity for water treatment discharge water.

7.6 Hazardous Materials Management

The proposed project will not impact the facility's Hazardous Materials Management, neither during the project nor after its completion. Consequently, there will be no change in the amount of stored hazardous materials.

7.7 Land Use

The proposed change does not affect the conditions of use presented in the Land Use analysis nor the Findings of the final commission Decision 2010-09. Therefore, impacts related to land use are not expected. The proposed change will occur within the MSP facility and the existing Conditions of Certification are adequate to protect land use resources.

7.8 Noises and Vibration

Construction noise is a temporary phenomenon and, in this case, is expected to occur over a period of about 2 months. The closest and only noise-sensitive noise receptors within several miles are six to eight residential homes at four widely separated locations between approximately 460 feet and 3,510 feet from the plant. Noisy construction is limited to daytime hours so that potential impacts of affected residents are mitigated to a level of insignificance.

Because of the distance of the nearest residents no vibration effects would be likely during the construction.

With the implementation of the Conditions of Certification, the project conforms to applicable LORS related to noise and all potential noise and vibration impacts will be mitigated to insignificance.

7.9 Public Health

This Petition does not affect any of the findings, conclusions, or conditions of certification in the Public Health section of the Final Decision.

7.10 Socioeconomic Resources

The proposed project would not cause a significant adverse direct or cumulative impact on housing, employment, schools, public services, or utilities. The project conforms to applicable LORS related to socioeconomic matters and all potential socioeconomic impacts will be insignificant.

7.11 Soil and Water Resources



The proposed change will impact the Soil and Water Resources by increasing the quantity of Surface Impoundments and the total capacity of wastewater storage. However, the design's intent is to replicate the existing evaporation pond design to the extent practical and consistent with current pond liner systems. The new ponds will adhere to the approved plan design, and the implementation of Conditions Soil&Water-2, Soil&Water-6, and Soil&Water-7 will ensure the plant continues to operate without adverse impact on the environment. The existing conditions will be implemented adequately to prevent adverse impacts from waste-generation effects.

7.12 Traffic and Transportation

The proposed project does not necessitate any changes in the workforce for plant operation; therefore, there will be no traffic or transportation impact resulting from the workers' commute.

7.13 Transmission Line Safety & Nuisance and System Engineering

The proposed project does not impact the transmission systems.

7.14 Visual Resources

The California Environmental Quality Act (CEQA) Guidelines define a "significant effect" on the environment to mean a substantial, or potentially substantial, adverse change in any of the physical conditions in the area affected by the project including...objects of historic or aesthetic significance (Cal. Code Regs., tit. 14, subsection 15382).

The proposed change will occur inside the facility and does not affect any of the findings, conclusions, or conditions of certification in the visual resources section of the Final Decision.

7.15 Waste Management

The proposed change will not impact the level of solid waste production from the MSP; therefore, there will be less than a significant impact.

7.16 Worker Safety and Fire Protection

As a result of the safety procedures in place, the proposed project will have a less than significant impact on worker safety and fire protection.

8 Potential Compliance Impacts and Landowner Impacts

8.1 Impacts the Modification May Have on the Facilities' Ability to Comply with Applicable Laws, Ordinances, Regulations and Standards

The project modification, as proposed, would have no adverse effect on the ability of the certified facility to comply with applicable LORS. The project would allow the MSP facility to continue to run efficiently, and to meet environmental goals and the current demand for electricity. The project would continue to operate in compliance with all applicable LORS.



8.2 How the Modification Affects the Public

With implementation of the modification as proposed, the construction of the new ponds would have no immediately detectable effect on the public.

8.3 Property Owners Potentially Affected by the Modification

No impacts to any proximate or distant property owners could be identified. The closest properties are between 460 feet and 3,510 feet from the plant.

9 References

Final Commission Decision, September 2010, CEC-800-2010-008-CMF, Docket Number 09-AFC-5

10 Appendix

- 10.1 Design Memorandum
- **10.2 Design Plans**
- **10.3 Technical Specifications**
- **10.4 Construction Quality Assurance Plan (CQA)**



10.1 Design Memorandum



10.2 Design Plans



10.3 Technical Specifications



10.4 Construction Quality Assurance Plan (CQA)



10.1 Design Memorandum



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November 22, 2023

Ms. Mahnaz Ghamati Quality, Environmental & Compliance Manager **ATLANTICA Sustainable Infrastructure** Mojave Solar LLC 42134 Harper Lake Road Hinkley, California 92347

SUBJECT: Basis of Design Memorandum – New Alpha and Beta Ponds Mojave Solar Project Evaporation Ponds, Hinkley, CA HAI Project No. ASI-23-004

Dear Ms. Ghamati,

Mojave Solar Project (MSP) has retained Hushmand Associates, Inc. (HAI) to evaluate options for the existing and potential future evaporation ponds at the Mojave Solar Project located in Hinkley, California. The purpose of this Design Memorandum is to present the design basis for the proposed new Alpha Pond A-3 and Beta Pond B-3.

Given that the regulatory agencies have previously reviewed and permitted the existing evaporation ponds, the design for the proposed new ponds was largely maintained to be consistent with the previous design concepts. HAI has prepared the design plans, Technical Specifications, and Construction Quality Assurance (CQA) plan for use in permitting and contracting the associated construction.

HAI was also retained to evaluate potential modifications to the existing Alpha and Beta ponds to extend the service life, prior to construction of new ponds. The recommendations for the existing ponds were presented in a separate Design Memorandum from HAI dated October 17, 2023.

Status of the Existing Evaporation Ponds

MSP currently has 4 evaporation ponds where wastewater generated by the water treatment facility is discharged to the evaporation ponds. The evaporation ponds were constructed per the

design plans prepared by Gannett Fleming (2012a, 2012b, 2012c). The ponds have been constructed with a liner system comprised of a lower 40 mil high-density polyethylene (HDPE) geomembrane, interstitial leak collection geonet, and upper 60 mil HDPE geomembrane.

The ponds have been receiving wastewater since August 2014. As of June 2023, the wastewater depth in the evaporation ponds was 6.50 feet in Alpha East, 7.00 feet in Alpha West, 5.40 feet in Beta East and 9.6 feet in Beta West (Ninyo & Moore, 2023). The depth of the wastewater has tended to increase year over year, which has necessitated the need for this evaluation as the currently permitted capacity would be reached within the next few years.

MSP is also in the process of adding netting over the evaporation ponds to limit birds from entering the pond. It is expected that the addition of the netting will further reduce the rate of evaporation due to less air flow across that pond surface.

HAI Basis of Design for New Evaporation Ponds

HAI performed site visits on August 23, 2023, and on October 12, 2023, to observe the evaporation ponds and discuss the site conditions and goals for adding new evaporation ponds. As discussed with MSP site personnel, a new Alpha Pond and a new Beta Pond were to be designed. The intent of the design was to replicate the existing evaporation pond design to the extent practical and consistent with current pond liner systems.

The basic design criteria included:

- 1. The size of each pond should be roughly 250,000 sf similar to the existing ponds.
- 2. The depth of each pond should be nominally 10 feet, which includes the 2 feet of freeboard this is also similar to the existing ponds.
- The liner system shall include a lower 40 mil high-density polyethylene (HDPE) geomembrane, interstitial leak collection geonet, and upper 60 mil HDPE geomembrane. With the exception of using black conductive geomembrane (vs. white), the liner system is the same as existing ponds.
- 4. The leak detection sump, piping and manhole system is the same as existing ponds.
- 5. Neutron probe test pipes and ground water detection monitoring wells will be installed for enhanced monitoring for leaks, consistent with the existing ponds.
- 6. From a constructability perspective, the design of the ponds was graded in an attempt to balance the amount of cut and the amount of fill to reduce overall construction costs and exporting of material to a stockpile.



In summary, the proposed new ponds are nearly identical to the existing ponds in terms of containment system design, leak detection monitoring, and external detection monitoring systems. The design plans for the proposed ponds are included as Attachment A, Technical Specifications are included as Attachment B, and the Construction Quality Assurance Plan is included as Attachment C.

Existing Site Conditions

The MSP project site is located east and west of Harper Lake Road and north and south of Lockhart Road near the town of Lockhart, in San Bernardino County, California. The property includes Section 33 and portions of Sections 28, 29, 30, and 32 within Township 11N – Range 4W, San Bernardino Base Meridian (SBBM). The site is relatively flat with a gentle downward slope toward Harper Lake to the northeast. The site currently includes the Alpha and Beta solar power generation plants and associated facilities. Elevations on the main solar project site range from approximately 2,020 feet above mean sea level (MSL) near the northeastern end of the site on Harper Lake, to approximately 2,105 feet MSL at the southwest corners of Sections 30 and 33. Vegetation generally consists of a sparse to moderate growth of weeds and brush.

In the immediate area of the proposed Alpha A-3 Evaporation Pond, the elevation ranges from 2,041 feet MSL in the southwest corner to 2,037 feet MSL in the northeast corner. The average grade is approximately 0.5%. The Alpha A-3 site has very sparce vegetation of weeds and brush.

The proposed Beta B-3 Evaporation Pond is also very flat with elevations ranging from 2,063 feet MSL in the southwest corner to 2,057 feet MSL in the northeast corner. The Beta Pond B-3 site is the location of the former Assembly Building. The building structure has been removed; however, the building's concrete slab and surrounding asphalt pavement remain. Since the site is paved, there is little to no vegetation. The concrete slab and asphalt paving will have to be removed prior to construction of the pond.

Geotechnical / Soil Conditions

The geotechnical conditions for the overall site were evaluated by Ninyo & Moore (2009). Ninyo & Moore evaluations were generally performed to provide recommendations for the buildings and infrastructure for the solar facility. Ninyo & Moore performed six percolation tests within the proposed evaporation pond and land farm areas at the subject site. The percolation test borings were advanced on April 3, 2009, with a truck mounted, 8-inch diameter, continuous flight auger drill. The materials encountered in the borings consisted of old alluvium. As encountered, the alluvial materials generally consisted of light brown to brown, dry to damp, loose to medium dense, silty fine to coarse sand. The depth to the regional groundwater table at the site is anticipated to be on the order of 150 feet. Perched groundwater, however, was encountered in several of their borings at a depth of approximately 28 to 32 feet. Groundwater levels at the site may fluctuate due to seasonal variations, groundwater withdrawal or injection, or other factors.



As concluded by Ninyo & Moore (2009), "In general, excavation of the alluvial material and lake deposits should be achievable with earthmoving equipment in good operating condition. Variations of in-place moisture content will be encountered; therefore, aeration or moisture conditioning during compaction should be anticipated. If encountered, cemented caliche deposits will necessitate heavy ripping during grading."

Given that the depth of excavation for the proposed ponds is typically less than 6 feet and maximum depth of excavation for manholes and neutron probes is 15 feet, HAI draws the same conclusion that the excavation should be achievable with earthmoving equipment in good operating condition. To further support this conclusion, it is HAI's understanding that there were no significant excavation/construction issues during construction of the existing evaporation ponds. Groundwater or perched water are not expected to be encountered.

Evaporation Pond Liner Design Plans

HAI has prepared design plans for the construction of the proposed Alpha A-3 and Beta B-3 Evaporation Ponds (Attachment A). Each of the ponds was designed to be consistent with past design and construction practices at the stie. Each of the ponds will be excavated to the grades shown in the plans. Excavated soil will be used to construct an engineered fill around the pond. The berm will prevent stormwater runoff from entering the evaporation pond. The grading plans were developed to limit the need for exportation of materials to other parts of the site. However, the Beta B-3 Evaporation Pond was limited in space by existing access roads and the existing Beta West Pond as well as the need to remove the existing asphalt pavement and concrete slab. It should be noted that the topographic mapping used for the design of the ponds was the same as the original evaporation pond design used by Gannett Fleming (2012c). Based on the site visits by HAI, the ground conditions at Alpha A-3 Evaporation Pond have changed very little. Beta Pond B-3 Evaporation Pond site did have the Assembly Building constructed after the topographic survey was completed, however, HAI does not believe the grades were significantly altered during the building construction. HAI recommends that a current site survey be completed prior to construction to confirm construction quantities and design considerations.

The containment and leak detection system are the same as the existing evaporation ponds as designed by Gannett Fleming (2012c). The liner system includes a lower 40 mil high-density polyethylene (HDPE) geomembrane, interstitial leak collection geonet, and upper 60 mil HDPE geomembrane. If a leak were to occur in the upper 60 mil HDPE geomembrane, the liquids would flow through the geonet to the sump located in the center of the pond. Accumulated liquids would then flow through the leak detection pipe to the leak collection manhole. Liquid volumes are monitored to confirm the liner system is performing as designed.



Each pond will receive wastewater through a forcemain pipeline. The existing forcemain (Gannett Fleming, 2012a) is a 4-inch diameter Schedule 80 PVC pipe. Additional 4-inch Schedule 80 PVC pipe and control valves (similar to the existing control valves) will be installed to allow MSP to direct the wastewater to the proposed evaporation ponds.

Based on the design plans, Alpha A-3 Evaporation Pond has a maximum storage capacity of 13.1 million gallons and Beta B-3 Evaporation Pond has a maximum storage capacity of 13.2 million gallons. The maximum storage capacity is computed as the volume stored when there is 2 feet of freeboard remaining (i.e., the water surface is 2 feet below the crest of the pond).

Technical Specifications and CQA Plan

HAI has prepared Technical Specifications (Attachment B) and CQA Plan (Attachment C) for the construction of the proposed evaporation ponds. The Technical Specifications in combination with execution of the CQA Plan will ensure the project is completed in accordance with the intent of the design plans and meets industry standards for the materials used in the construction of the project. Both the Technical Specifications and CQA Plan were compared to the Gannett Fleming 2012 documents for construction of the existing evaporation ponds. In general, the documents are similar in the requirements for the materials, and testing during construction are the same or more stringent for the proposed evaporation ponds.

Detection Monitoring

In addition to the geonet leak detection system that underlies the entire upper 60-mil HDPE geomembrane, each of the ponds will have three neutron probe access pipes below the liner system to monitor for changes in the vadose zone moisture conditions. The neutron probe access pipes and neutron probe monitoring program were included with the existing evaporation pond construction. The neutron probe monitoring is performed on a simi-annual basis. To date there has been no evidence of a release from the evaporation ponds (Ninyo & Moore, 2023).

The proposed evaporation ponds would also install, similar to the existing evaporation ponds, perched groundwater monitoring wells. Based on the groundwater gradient presented in the Annual Report by Ninyo & Moore (2023), the proposed perched groundwater monitoring wells have been located in a similar, downgradient manner as the existing ponds. The locations of the proposed perched groundwater monitoring wells are shown on Sheet 3 of the respective construction plans in Attachment A.



Construction Quantities

HAI has estimated the following will be required for construction of the proposed evaporation ponds:

Alpha Pond A-3

- Excavation 31,000 cy
- Engineered Fill 31,000 cy
- Neutron Probes 6 access boxes and 2,250 feet of 4-inch HDPE Pipe SDR 11
- Perched Groundwater Monitoring Wells 2 each
- 4-inch Schedule 80 Forcemain 1,200 ft and associated valves and boxes
- 40 mil HDPE Geomembrane 275,000 sf
- Geonet Drainage Layer 275,000 sf
- 60 mil HDPE Geomembrane 275,000 sf
- Leak Detection Manhole and Piping 2 each

Beta Pond B-3

- Demolition of Existing 8-inch-thick concrete slab 90,000 sf
- Demolition of Existing asphalt paving 100,000 sf
- Excavation 38,000 cy
- Engineered Fill 11,000 cy
- Neutron Probes 6 access boxes and 1,800 feet of 4-inch HDPE Pipe SDR 11
- Perched Groundwater Monitoring Wells 2 each
- 4-inch Schedule 80 Forcemain 820 ft and associated valves and boxes
- 40 mil HDPE Geomembrane 290,000 sf
- Geonet Drainage Layer 290,000 sf
- 60 mil HDPE Geomembrane 290,000 sf
- Leak Detection Manhole and Piping 2 each

Summary

The existing Alpha and Beta Evaporation Ponds were constructed in 2012. Since their construction the liner system has performed well, however, the ponds are accumulating liquids/solids and additional capacity is needed. HAI has prepared design plans for the construction of a new Alpha and new Beta Evaporation Pond. The ponds follow much of the same design as the original approach utilizing a containment system of a lower 40-mil HDPE geomembrane, geonet interstitial drainage layer, and upper 60-mil HDPE geomembrane. Review of the geotechnical information provided by Ninyo & Moore (2009) indicates that conventional earthmoving equipment will be able to excavate and process the materials for use in the



construction of the earth fills and grading for the project. The ponds will include a leak detection system for detecting and collecting liquids between the liners that are essentially the same as the existing evaporation ponds. The design includes neutron probe monitoring pipes and perched groundwater monitoring wells for enhanced detection monitoring beyond the liner system.

Construction of the evaporation ponds will follow the Technical Specifications, Construction Quality Assurance Plan, and Design Plans. The documents were prepared to follow general industry standards and are consistent with the construction methods and standards used for the original evaporation ponds.

Reference Documents

Gannett Fleming Drainage, Erosion & Sediment Control Plan Report, May 13, 2011.

Gannett Fleming, Construction Drawings – Raw Water Pipe and Evaporation Pond Force Main, Mojave Solar Project, March 1, 2012a.

Gannett Fleming, Mojave Solar Project, Process Wastewater Evaporation Ponds and Bioremediation Facilities, Supplemental Technical Specifications, May 1, 2012b.

Gannett Fleming, Construction Plans – Process Wastewater Evaporation Ponds and Bioremediation Facilities, Mojave Solar Project, Revision 3 dated December 12, 2012c.

Ninyo & Moore, Geotechnical Evaluation, Mojave Solar Project, Lockhart, California, May 15, 2009, Project Number 105879004.

Ninyo & Moore, Annual Report – July 2023 Detection Monitoring Program/Groundwater Monitoring Plan Report, California Energy Commission, Mojave Solar Project, July 30, 2023

Attachment A – Evaporation Ponds Design Drawings Attachment B – Technical Specifications Attachment C – Construction Quality Assurance Plan





10.2 Design Plans



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TABLE 1												
COLLECTION MANHOLE COORDINATES												
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A-3	CMH-A6	2193060.5	6765832.9									





Note 1: Neutron Probe center pipe is 5' below collection area. Pipes on north and south sides of ponds are 5' below pond toe.

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	94)	Constru #4@6" E/	ICT 4'LX4'W /W. SLOPE	X6'H 4000 CONCRETE	PSI CONCRE 1" AS NOTE	ete slab r D on detai	EINFOR	CED WITH		В		
	95	CAST 24 COVER IN	"X18" WATEF V CONCRETE	r meter 1 E slab.	YPE CAST IF	RON BOX WI	TH CAS	st iron				
	96)	INSTALL DRAINAG	3" OF ¾ IN E.	CH DIAME ⁻	TER ROCK UN	IDER CAST	IRON B	OX FOR				
	97)	INSTALL CAST IRC THE EYE	a 2º diame Dn Box. Se Bolt.	TER STAIN CURE A 3	LESS STEEL " LONG STAIN	eye Bolt I Iless steel	N THE L CARA	side of Biner to	THE			
	98	PROVIDE CABLE IN END OF ONE END LOOP THI END OF	800 FEET I EACH NEU THE CABLE. OF THE CA E REMAININ THE CABLE	OF 1/16" I JTRON INSI LOOP TH ABLE TO T G CABLE I TO THE C	Diameter Sti Pection Pipe E Cable in He Carabini N The Cast Arabiner Oi	Randed 30 . Provide The Manho Er on The Iron Box N The Box	4 stain A 2" l(Le and Manhc And se Wall.	ILESS STE DOP ON E SECURE DLE WALL. CURE TH	EL EACH	C		
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	A REV.	11/14/2023 DATE	ISSUED FOR	PERMITTING	PTION	K DRA	KJK WN BY C	SGS HECKED BY	BH PASSED BY	נ 		
			MOJA	VE S	OLAR	PROJE						
	E	EVAP	ORATI	ON P	OND - A	LPHA	PO	ND A	3			
	ALPHA SITE POND SECTIONS											
		4	A	Atla	nti	ca	PLA	^{N NO:} CO()5	J		
	HUSHMAND ASS Geotechnical and Ear	OCIATES, INC. thquake Engineers	SUSTAI	NABLE	INFRAST	RUCTUR	E SHE	ETS: 7 SH	IEET NO: 5			
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12	CONS	13 STRUCT		1/ -S	4		15			
UPPER LINER. UPPER		CONSTRU	CT 4' DIA.	-S PRECAST CONCR	ETE MANHOL	E PER AS	TM C478.			
AND CONDUCTIVE. UAL. SEE POND AND		MANHOLE SLOPE TO	INVERT TO SUMP.	HAVE A 6" DEE	EP SUMP. C	ONSTRUCT	FLOOR TO)	Δ	
		IMBED A	HALLIDAY S	ERIES W1R 3030) ALUMINUM,	30" X 30	CLEAR			
O BE AS MANUFACTURED	2	PROVIDE	DRAIN FROM	CHANNEL FRAI	ME TO SIDE	OF CONCR	ETE PAD.	011		
IET MATERIAL BETWEEN		INSTALL L.	DOOR SO H	OPENS TOWARD) THE POND	AS NOTED	ON SECTI	UN		
L BE A MINIMUM OF TY OF 0.06 METERS PER	$\overline{3}$		AND INSTAL	L A HALLIDAY F	PROTECTIVE	GRATING P	ANEL ACCE	SS		
1 FOOT. GEONET SHALL DUIVALENT. SEE POND			CT & 6'-0"	X 10'-0" X 6"	CONCRETE F		ND THE			
	(4)	MANHOLE	. INSTALL #	4 @ 12" EACH	WAY IN CON	CRETE PAD). COMPAC	Г		
BE CONSTRUCTED TO		DENSITY	AS PER AS	TM D698.	NHULE SLAB	10 95% N	IAXIMUM		В	
SITY PER ASTM D1557.		INSTALL TO PUMP	LEACHATE F LEACHATE	PUMP, PIPING, PO BACK TO POND.	OWER AND C . PUMP AND	ontrols Appurtei	AS REQUIRI NANCES TO	ED BE		
AREAS TO ACHIEVE A		SIZED FO THE CEC.	R ALERT LE SIZE PUMF	VEL 2 (AL2) AS FOR A MINIMUM	DETERMINE) by linef 25 gpm pe	r tests an Ending	ND		
TOR SHALL STABILIZE	(5)	RESULTS	OF LINER T	ESTS. PUMP TO	BE HARD W	RED TO C	ONTROL PA	NEL ?		
THE YIELDING MATERIAL IERE. IN GRANULAR		ON/OFF	SWITCH, BRE	EAKER, AUTO/ON	N/OFF, RUNN	ING TIME	METER, ANI) тыг		
TH A HEAVY (MINIMUM N CLAY SOILS.		COLLECTI	ON MANHOL	E CONCRETE SL	AB.					
OADED TANDEM AXLE	(5A)	DO NOT DRAINS E	NSTALL CHI BACK TO MA	NHOLE OR TO F	POMP. SLOPE POND SO WA	TER WILL I	IHAT II NOT STAND	IN	С	
ROOFROLL THE SOIL		PIPE.	AN ELECTRI	C LEAK SENSOR	TO SENSE V	VATER IN [.]	THE			
		COLLECTI START A	ON MANHOL GREEN BLIN	E AND TO STAR NKING LIGHT TO	T THE PUMP SIGNAL TO (. SENSOR	TO ALSO 5 THAT THE	-		
RE THE EXPOSED	(7)	COLLECTI PUMP_ST	ON MANHOL	E HAS WATER A SENSOR TO SE	ND THE PUN	IP HAS ST	ARTED. WH	EN GHT		
ING SOIL TO OPTIMUM LOCATE AREAS OF		FROM BL	NKING. LIGH	T AND SENSOR	CONTROLS T	O BE MOU	INTED ON			
DRESS THE UNSUITABLE JRFACE. THE		LOCATION	TO BE VE	RTICALLY ADJUS	TABLE.					
BIT EXCESSIVE PUMPING BY REMOVING AND		INSTALL SHALL BE	2 DISCHAR E PIPED ANI	GE PIPE FROM TO DI	HE PUMP TO	CK INTO 1	HE SURFA	MP CE		
NED SOIL OR SAND AS YERS TO 8" BELOW	8	impoundi Equipped	MENT OR TO WITH A RE) A TANKER TRU CORDING FLOW	JCK. THE DIS METER SHOW	CHARGE F ING THE F	PIPE SHALL PUMP TOTA	BE L	U	
FROLLING SHOULD BE		FLOW IN	GALLONS A	ND INSTANTANEC	DUS FLOW RA	ATES IN G	PM.			
IG SHOULD BE	(9)	PIPE DET	AIL.	ARGE AT DISCH	ARGE PIPE A	S PER PU	NU DISCHA	KGE		
IC-TIRED CONSTRUCTION	62A	DISTRIBUT	TION PIPE T	O BE 4" DIP. AL	L FITTINGS	o be dip.	ALL PIPES	S TO		
ER.		BE RESTR	RAINED.							
OF EACH POND. HE UPPER AND LOWER										
ASHED GRAVEL TO A									E	
AREA TO THE LEAK										
AWINGS. PERFORATED										
FORATIONS EQUALLY										$\left\{ \right\}$
COLLECTION PIPE TO BE										
JSING WATER TIGHT										
LAIN BY 160Z/SY ALL ALSO BE OVERLAIN									F	
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