DOCKETED	
Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	258630
Document Title:	Data Requests Set 2
Description:	N/A
Filer:	Marichka Haws
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	8/22/2024 10:01:34 AM
Docketed Date:	8/22/2024

August 22, 2024

Curt Hilderbrand
Hydrostor, Inc.
400 Capitol Mall, Suite 3000
Sacramento, CA 95814-4497

Data Requests Set 2 for Willow Rock Energy Storage Center (21-AFC-02)

Dear Curt:

Pursuant to California Code of Regulations, title 20, section 1716, California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 2, which is necessary for a complete staff analysis of the Willow Rock Energy Storage Center (WRESC) under the Warren-Alquist Act and California Environmental Quality Act (CEQA).

Responses to the data requests are due to staff within 30 days. If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Committee within 20 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see California Code of Regulations, title 20, section 1716 subd. (f)).

If you have any questions, please email me at leonidas.payne@energy.ca.gov.

/S/

Leonidas Payne
Project Manager

Enclosure: Data Requests Set 2

WILLOW ROCK ENERGY STORAGE CENTER
DATA REQUESTS SET 2

AIR QUALITY

BACKGROUND: Air Quality Modeling for Construction Phase

The construction phase of the project is expected to take as long as 60 months. The applicant conducted the air quality modeling for construction phase. As shown in table 5.1-12 and 5.1-13, both federal and state 1-hr NO_2 standards were exceeded for the no-architectural berm and architectural berm options. The applicant remodeled the 1-hr NO_2 impact by assuming the use of tier 4 engines. However, the result is still above the federal 1-hr NO_2 standard.

DATA REQUEST

25. Since the modeled 1-hour NO*2* impact exceeds federal and state 1-hr NO*2* standards, please refine the 1-hour NO*2* modeling for construction phase, including both the no-architectural berm and architectural berm options. Refined modeling may include the use of ozone limiting method (OLM) or plume volume molar ratio method (PVMRM) and pairing modeled impacts with seasonal hour-of-day background. Please provide updated modeling files. If the results are still above the standards, please provide further mitigation measures to reduce the impacts to less than significant.

HAZARDOUS MATERIALS AND WILDFIRE

BACKGROUND: Diesel Fuel Storage

The Supplemental Application (Section 2.0 and Section 5.5) indicates four diesel generators as part of project operations (one generator for the emergency fire pump and three as emergency backup power supply) and three potential additional diesel generators that may be used during project construction (one for the concrete batch plant and two for the construction rock crushing facility). The Supplemental Application does not clearly list the volumes, types, and locations of diesel fuel storage for these generators. The document lists a 600-gallon integrated tank for the fire pump and an approximate 12,000-gallon diesel tank for diesel fuel, but also notes that integrated fuels tanks will be used as part of the emergency generation systems. Diesel fuel is identified as being used during project construction for equipment and vehicles, however no information is provided on whether diesel fuel would be stored onsite during project construction for refueling. No mention is made of diesel fuel storage volumes or location for the potential construction generators.

DATA REQUESTS

26. Please clarify volume, location, and type of storage of diesel fuel for the four generators to be used during project operation.

27. Provide information on diesel fuel storage volumes, locations, and storage types for potential diesel generators that would be used during project construction for the concrete batch plant and the rock crushing facility.

28. Verify whether diesel fuel would be stored onsite during project construction and, if so, provide information on anticipated volumes, storage type, and locations of diesel storage.

29. Provide information on how often the construction and operations fuel tanks would need to be refilled and any safety procedures that would be used during refilling to prevent leaks or spills.

30. Provide information on safety procedures for construction and operation to prevent leaks and spill of diesel fuel during use of the fuel tanks.

BACKGROUND: Hazardous Materials Usage During Project Construction

Section 5.5.1.2.1 provides a brief summary of the types of hazardous materials that would or could be used during project construction. However, neither this section nor the remainder of Section 5.5 provide any additional information on uses of these materials, anticipated storage volumes, or storage types, or storage locations for hazardous materials during construction.

DATA REQUESTS

31. Provide a discussion of anticipated uses, storage volumes, types, and locations for hazardous materials used during project construction. Provide a table similar to Table 5.5-1 through 5.5-3 as an example.

32. Provide a discussion of transportation requirements for hazardous materials during project construction.

BACKGROUND: Hazardous Material Usage During Project Operation

Section 5.5.2.4 notes "the proposed transportation route for delivery of hazardous materials and regulated materials, such as sulfuric acid, to the WRESC would avoid the school, if possible." Sulfuric acid is not listed in the document as a hazardous material that would be used by the Project.

DATA REQUEST

33. Verify whether or not sulfuric acid is being used by the Project. If so, please provide all the pertinent information that would have been provided in Tables 5.5-1 to 5.5-3, such as use, storage locations, volumes, description, and toxicity, etc.

BACKGROUND: Phase I ESA for Transmission Line

The Supplemental Application includes a Phase I Environmental Site Assessment (ESA) for the Project site (Appendix 5.14A), however no environmental assessment is noted or included for the transmission line between the WRESC and the Southern California Edison Whirlwind Substation. Potential sources of known or suspected environmental contamination at the WRESC or along the transmission line have not been discussed.

DATA REQUESTS

34. Provide a Phase I ESA (or equivalent environmental assessment) for areas of ground disturbance along the transmission line.

35. Provide locations of anticipated ground disturbance along the transmission line, including anticipated surface areas and depths.

BACKGROUND: Fuel Models for Project site and Transmission line

Section 5.16.1.3.4 provides a discussion of fire fuel sources in the project area and the Tehachapi Management Area. Included in this section is a brief discussion of the Fuel Models present in the area and a Table that describes the Fuel Models. However, the section does not indicate how the varying Fuel Models relate to varying portions of the Project.

DATA REQUEST

36. Provide a discussion and map that indicates how each identified Fuel Model relates to the Project specifically and where they are in relation to each component of the Project, including the transmission line.

LAND USE, AGRICULTURE, AND FORESTRY

BACKGROUND: Timing of ROW Grant from BLM

The Supplemental Application states in Section 5.6.2.2.7 (page 5.6-12):

Prior to construction, the Applicant will contact the applicable BLM office and notify them of its intent to submit an "Application for Transportation and Utility Systems and Facilities on Federal Lands". This application is also referred to as a SF-299 form. The Applicant will then set up a pre-application meeting with a BLM Realty Specialist or appropriate staff member to discuss the WRESC Project and gen-tie line routes across the above referenced parcels. Following the pre-application meeting, the Applicant will submit a SF-299 application for review and approval, if required. BLM recommends that SF-299 applications be submitted more than 60 days prior to construction.

DATA REQUEST

37. Please provide more specific timing on when the applicant would initiate the ROW grant application process with the BLM, i.e., during the certification process with the CEC, or following CEC certification of the project but prior to construction.

BACKGROUND: Timing of Rezone of Project Site

In Sections 5.6.3.3.1 to 5.6.3.3.4 of the Supplemental Application (pages 5.6-37 to 5.6 39), the applicant states that although the proposed project is allowed with a Conditional Use Permit in the existing Kern County "Limited Agriculture" zoning designation, Kern County staff recommended the applicant apply for a rezone of the

project site to "Exclusive Agriculture" to make the site's zoning designation consistent with the Kern County General Plan land use designation of "Resource Management." The new zone of "Exclusive Agriculture" would also allow the project with a Conditional Use Permit. The applicant stated that they have applied for this rezone.

DATA REQUEST

38. Please provide the approximate timeline of the rezone process, as well as documentation once the rezone has occurred.

PUBLIC HEALTH

BACKGROUND: Health Risk Assessment (HRA) for Construction and Commissioning Phase

The construction phase of the project is expected to take approximately 60 months (followed by several months of startup and commissioning). A screening health risk assessment was conducted for the construction period due to emissions of diesel particulate matter (DPM). The estimated cancer risks at Point of Maximum Impact (PMI) are 225 in one million in architectural option and 273 in one million in no-architectural beam option. Both are much higher than the significance threshold of 10 in one million. The applicant said that the PMI locations are all along the immediate eastern fence and do not represent either worker or residential receptor locations.

DATA REQUEST

39. Since the cancer risks at PMI are significant, please discuss how the applicant intends to use mitigation measures to reduce the cancer risk to a level of less than significant during construction and ensure the protection of public health. If the results of any health risk assessment results in a health risk of greater than 10 in one million, please provide a map containing health risk isopleths, including an isopleth showing the risk value of 10 in one million.

TRANSPORTATION

BACKGROUND: FAA and DOD Determinations

On May 23, 2024, the Applicant filed Federal Aviation Administration (FAA) Form 7560-1 through the agency's online portal (TN 256622, TRAN-2). The Applicant also submitted an application package for approval to the U.S. Department of Defense (DoD) Military Aviation and Installation Assurance Siting Clearinghouse. Correspondence related to the submittal of the DoD clearinghouse form is also provided in the Applicant's Willow Rock Data Adequacy Response document submitted on May 31, 2024 (TN 256622). The Applicant stated they will file FAA and DoD determinations to the project docket upon receipt. This supplemental information will be provided for conformance with Siting Regulations, Appendix B (g) (5) (B) and Appendix B (g) (5) (B) (iv). Staff issues this

data request for tracking purposes of outstanding information required for the staff analysis.

DATA REQUEST

40. Please file further communications and determinations received from the FAA and the DoD to the project docket upon receipt.

BACKGROUND: Alternative Sites

On June 28, 2020, the Applicant filed a summary of the level of service (LOS)-based traffic study methodology to be implemented for the project (TN 257525). The Applicant will prepare a draft traffic study report for initial review by Kern County as outlined in the aforementioned methodology, respond to Kern County comments and prepare and submit a final traffic study report to both Kern County and the CEC. This additional traffic volume data and corresponding LOS information will further assist the CEC in understanding project effects to roadway and intersection capacity in the vicinity of the project site. Staff issues this data request for tracking purposes of outstanding information required for the staff analysis.

DATA REQUEST

41. Please file the final traffic study report and a record of transmittal of a copy to Kern County, to the project docket upon completion.