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CALIFORNIA ENERGY COMMISSION

CALIFORNIA NATURAL RESOURCES AGENCY

August 27, 2024

STACK Infrastructure
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 1 for AVAIO Pittsburg Backup Generating Facility (24-SPPE-01)

Dear Scott Galati:

Pursuant to California Code of Regulations, title 14, section 15084(b) and title 20, section 1941, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 1, which is necessary for a complete staff analysis of the AVAIO Pittsburg Backup Generating Facility (PBGF) under the California Environmental Quality Act (CEQA).

This Data Requests Set 1 seeks further information in the areas of Air Quality and Public Health, Greenhouse Gas Emissions, Biological Resources, Cultural and Tribal Cultural Resources, and Hazards and Hazardous Materials based on the contents of the application submitted thus far. While CEC staff has made a concerted effort to capture all outstanding data needs, additional subsequent data requests in these, and other resource areas are possible, based on further information received or as necessary for a complete analysis of the project. To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA (see Cal. Code Regs., tit. 14, §§ 15108, 15109), CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need additional time, please send written notice to me within 10 days of receipt of this letter. If you have any questions, please email me at renee.longman@energy.ca.gov.

/S/
Renee Longman
Project Manager

Enclosure: Data Requests Set 1

AIR QUALITY AND PUBLIC HEALTH

Authors: Yifan Ding, Wenjun Qian, Ph.D., P.E.

BACKGROUND: CalEEMod Construction and Operation Emission Calculations

The SPPE Application Appendix B (TN 254729), Air Quality, Public Health and GHG Technical Report, sub-Appendix A, CalEEMod® Construction and Operational Emissions Outputs, is used to document CalEEMod emissions calculations. Staff needs the input and output files of the CalEEMod emissions calculations to complete the review.

DATA REQUEST

DR AQ-1 Please provide the input and output files of the CalEEMod emissions calculations.

BACKGROUND: Enforceable Permit Conditions, Annual Operations

Emissions estimates assume no more than 34 hours per year per engine for testing overall. Short-term impacts shown in Tables 31 and 32 of Appendix B Air Quality, Public Health and GHG Technical Report indicate only one engine will be tested at any one time during a single hour.

DATA REQUESTS

DR AQ-2 Please confirm that the applicant would request the Bay Area Air Quality Management District (BAAQMD) to require an enforceable limit that would allow no more than 34 hours per year per engine, for readiness and maintenance testing.

DR AQ-3 Please confirm that the applicant would request the BAAQMD to require an enforceable limit on concurrent testing of engines so that only a single engine operates for maintenance and testing at any given time.

BACKGROUND: Testing of Multiple Engines per Day

Page 15 of Appendix B (TN 254729) Air Quality, Public Health and GHG Technical Report states that for Pittsburg Backup Generating Facility (PBGF) operation, the proposed generators will be able to be tested 24/7. Therefore, staff expects that multiple engines would be tested per day. However, Page 10 of Appendix B states that daily emission rates were calculated by dividing 60 minutes of operation by 24 hours, as maintenance activities could occur at any hour of the day. Tables 31 and 32 of Appendix B also indicate that the applicant only

considered the worst-case impacts from single engines for the 3-hour, 8-hour, and 24-hour ambient air quality standards, rather than from multiple engines. Staff needs clarification regarding how many engines would be tested during any 3-hour, 8-hour, and 24-hour time periods.

DATA REQUESTS

DR AQ-4 Please clarify how many engines would be tested during any 3-hour, 8-hour, and 24-hour time periods.

DR AQ-5 Please update the impacts analysis based on the number of engines being tested for the 3-hour, 8-hour, and 24-hour ambient air quality standards.

BACKGROUND: Meteorological Data

A meteorological data set from the Pittsburg PG&E meteorological station (Site ID 2801) covering the period from January 2009 through December 2011 was utilized for the dispersion model, as provided by BAAQMD staff. However, BAAQMD now offers updated data for the five-year period from 2013 through 2017 including the site 2801[1]. Staff needs to request this updated meteorological data and the corresponding modeling results.

DATA REQUESTS

DR AQ-6 Please provide a justification of why the meteorological data from these specific years instead of more recent data was used in the analysis.

DR AQ-7 Please update all dispersion modeling and Health Risk Assessment (HRA) results using the most recent five years of meteorological data provided by the BAAQMD.

BACKGROUND: Health Risk Assessment (HRA) for Low-load Conditions

In Appendix B (TN 254729), Table 43 displays the excess lifetime cancer risk, chronic noncancer Hazard Index (HI), acute noncancer HI, and annual PM2.5 concentration at the MEIR, MEIW, MERR, and MESR during backup generator operation at 100% load. However, Appendix B, Table 31 shows higher modeled operational concentrations at lower loads (75%, 50%, and 25%) for both PM10 and PM2.5. Staff needs to verify whether the Health Risk Assessment (HRA) results for these lower load cases exceed those for the 100% load case. Staff also needs to ensure that the health risks of the project during lower load cases would not exceed the BAAQMD Significance Thresholds.

DATA REQUESTS

DR AQ-8 Please provide the operational HRA results for lower engine load conditions of 75%, 50%, and 25%.

DR AQ-9 Please propose mitigation measures if the health risks of the project during lower load cases would exceed the BAAQMD Significance Thresholds.

REFERENCES

[1] AERMOD-Ready Meteorological Data. BAAQMD. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/ceqa-modeling-data. Last Updated: 11/15/2022

GREENHOUSE GAS EMISSIONS

Author: Jacquelyn Record

BACKGROUND: Insulative Gas Used in Circuit Breakers and Transformers

On page 2-11 of the SPPE Application (TN 254728) in section 2.3.3, the PG&E switchyard and project substation plans on using (2)245kV, 40kA rated sulfur hexafluoride (SF_6) gas insulated high voltage breakers which would be procured in 2025 and arrive onsite prior to the January 1, 2027 CARB phase-out date for this class of GIE.

DATA REQUESTS

DR GHG-1 In the event the breakers do not arrive onsite prior to the phase out date, discuss the alternative that will be used instead of SF_6.

DR GHG-2 Please provide an estimate of the quantity used and the amount of annual SF_6/non-SF_6 alternative leakage.

BACKGROUND: CONSISTENCY WITH GHG REDUCTION STRATEGY

The SPPE Application Part I (TN 254728) includes discussion of consistency with some of the GHG reduction measures. However, the application does not demonstrate consistency with the following control measures from City of Pittsburg General Plan 2040.

Policy 10-P-6.13:

a) Require new development to incorporate energy-efficient features through

passive design concepts (e.g., techniques for heating and cooling, building siting orientation, street and lot layout, landscape placement, and protection of solar access);

Staff needs to know whether the project would implement this control measure.

f) *Require developments to include vehicle charging stations that meet or exceed the requirements of State law and to include outdoor electrical outlets. Discourage portable generators or other portable power sources;*

Please include the number of vehicle charging stations that would be installed on the project site.

h) *Encourage projects to incorporate enhanced energy conservation measures, electric-only appliances, and other methods of reducing energy usage and greenhouse gas emissions; and*

Staff needs to know whether the project would implement this control measure.

a. **Bay Area 2017 Clean Air Plan**

Decrease the amount of energy consumed in the Bay Area through increased efficiency and conservation to reduce the amount of fossil fuel needed to produce the electricity that the region uses.

Page 4.8-11 of the SPPE Application Part I (TN 254728) states that due to the relatively high electrical demand of the data center uses on the site, energy efficiency measures have been included in the design and operation of the electrical and mechanical systems on the site.

Staff needs detailed description of the energy efficiency measures that are going to be included in the project to demonstrate consistency with the control measure ECM-1 Energy Efficiency in the Bay Area 2017 Clean Air Plan.

DATA REQUEST

DR GHG-3 Please provide detailed analysis of the effectiveness and likely implementation for each component of the control measures/policies mentioned above.

BIOLOGICAL RESOURCES

Authors: Julie Myrah, Chris Huntley

BACKGROUND: Biological Evaluation Report (BER)

Staff reviewed the BER included in Appendix C (TN 254729) and determined that revisions and additional information is needed where indicated in the Data Requests below.

DATA REQUESTS

DR BIO-1 Please ensure the names of figures in the table of contents accurately match the figures in the document to avoid confusion. For example, Figures 3, 5, 9 and 10 do not match. Figure 3. Map of Impacted Areas within Study Area is listed in the table of contents; however, in the BER, Figure 3 is Impacted Communities Map. Figure 5 in the BER is Natural Communities Map, but in the table of contents it is Map of Habitats within the Study Area, Figure 9 in the BER is Regional Special-status Animals Map but in the table of contents it is Regional Special-Status Species Map, and Figure 10 in the BER is Local Special-status Species Map but in the table of contents it is Large-Scale Special-Status Species Map.

DR BIO-2 BER Section 1.1 states 28 other special-status wildlife species; however, Table 2 lists 29 special status species either present, low potential, or potential to occur. Please clarify if the number of special status species is 28 or 29.

DR BIO-3 BER Section 1.1 references Sections 6.1 and 6.2 for detailed discussion on special status animals and plants. The correct reference would be Sections 6.2 and 6.3. Please edit accordingly.

DR BIO-4 Section 2.1 references the study area within Sections 13 and 14 of Township 2 North, Range 1 West; however, this should be Sections 13 and 24. Please make this edit to the BER.

DR BIO-5 In BER Table 3, please revise San Joaquin spearscale (*Extriplex joaquinana*) in regard to Habitat Conservation Plan (HCP) Natural Community Conservation Plan (NCCP) covered status. This species is included as a covered species in the HCP/NCCP.

DR BIO-6 In BER Section 4.1, please provide a copy of the California Natural Diversity Database (CNDDB) occurrence list referenced for the project. Please include a figure similar to Figure 2 in the Rare Plant Survey report that identifies special status wildlife occurrences within a 10-mile radius of the project site.

DR BIO-7 In BER Section 4.1, please provide the California Native Plant Society

(CNPS) list referenced for the project.

DR BIO-8 In BER Section 4.1, please run a new U.S. Fish and Wildlife Service (USFWS) Information Planning and Consultation list (IPaC list) and address the species that were not included in the December 2023 list located in BER Appendix E. For example, Western Spadefoot (*Spea hammondii*) and Lassics Lupine (*Lupinus constancei*). Revise Table 2 with federal listing status for Western Spadefoot and include Lassics Lupine in analysis and Table 3.

DR BIO-9 In BER Section 4.2, please provide resumes for all staff who conducted surveys and include the dates of the reconnaissance-level habitat assessment surveys, California tiger salamander (*Ambystoma californiense*)/California red-legged frogs (*Rana draytonii*) CTS/RLF breeding habitat surveys, and nighttime spotlight surveys. This is noted in the HCP/NCCP Planning Survey guidance.

DR BIO-10 BER Section 4.2 states a formal wetland delineation was conducted in December 2022. However, the Wetland Delineation Report in Section 2.3 lists that an initial wetland delineation was done in Spring 2019 with an updated delineation being done in December 2022. Please include the initial delineation date along with the initial survey personnel names.

DR BIO-11 In BER Section 6.2, please include a statement that Cooper's Hawk (*Accipiter cooperii*) was observed foraging during the surveys.

DR BIO-12 BER Section 7.2 notes "that the study area for this document differs slightly from the study area for the delineation report; the aquatic resource areas reported here differ slightly due to that change in study area boundary." Please explain the difference in the study area boundary and what is covered in the report.

DR BIO-13 BER Section 7.2 references Project Design Measures (PDMs) to reduce project impacts to aquatic and riparian habitats presented in Section 11. Section 11 does not include PDMs for impacts to aquatic and riparian habitats. Please clarify:

a. There are no avoidance, minimization or mitigation measures identified for impacts to wetlands and/or waters.
b. Include permanent/temporary and direct/indirect impacts anticipated and quantify the impacts to all wetlands and waters within the study area.
c. Will there be any indirect or operational impacts to the stream channel to the

east of the project site?

DR BIO-14 In BER Section 11.0, the PDM BIO-3 references Section 4.4.2.1 in the SPPE Application; however, the correct reference should be Section 4.4.3.1. Please edit accordingly.

DR BIO-15 BER Section 11.0 PDM BIO-3, please include all species level measures that are proposed and applicable from Section 6.4.3. The BER references Section 6.4.3 stating the project owner shall comply with all applicable provisions of the East Contra Costa County (ECCC) HCP/NCCP Section 6.4, Specific Conditions on Covered Activities and references Sections 6.4.1, 6.4.2 and 6.4.3. However, specific applicable measures are not identified. This can be done by including specific species PDM's for RLF, CTS and Burrowing Owl (*Athene cunicularia hypugaea*) as identified in the HCP/NCCP. Include applicable requirements as identified in Table 6-1 of the HCP/NCCP as well.

DR BIO-16 BER Section 11.0 PDM BIO-8; HCP/NCCP Section 6.4.3 for Swainson's Hawk (Buteo swainsoni) identifies a 1,000-foot buffer. Please revise and include in PDM BIO-8 to comply with HCP/NCCP. In addition, include the statement: "If site-specific conditions or the nature of the covered activity (e.g., steep topography, dense vegetation, limited activities) indicate that a smaller buffer could be used, the implementing entity will coordinate with California Department of Fish and Wildlife (CDFW)/USFWS." Include notifying the City of Pittsburg to determine the appropriate buffer size.

DR BIO-17 BER Appendix A cover says photos were recorded 11/2018 to 06/2019; however, Section 4.2 references photos taken between April 2022 to July 2023. Photos range from 2019 to 2023. Please revise as appropriate.

DR BIO-18 BER invasive species discussion, please clarify mitigation measures to control the spread of invasive species. Include a complete list of non-native and invasive plants and their ratings. Include appropriate measures/Best Management Practices (BMPs) to avoid the spread and prevent new infestations including inspecting vehicles and treating new infestations. Please also identify any mitigation measures to prevent the introduction of non-native gastropods or bivalves or clarify that these species are already present in the Project Site.

DR BIO-19 The CDFW has been referred a petition to list western burrowing owl as endangered or threatened under the California Endangered Species Act (CESA) that is currently under a 90-day evaluation. This petition was submitted by the Center for Biological Diversity and several other groups on March 5, 2024. There is the potential that western burrowing owl may become a candidate

under CESA in which no take may occur unless state take authorization is obtained for a project. The petition process timeline may be viewed here: https://fgc.ca.gov/cesa

a. Please include a discussion that in the event the species is listed during the life of the project, that the HCP/NCCP has a "No Surprises Clause" in which no additional measures will be required.

DR BIO-20 Please provide GIS data (shape and/or geodatabase files) for all data mapped for biological resources.

BACKGROUND: Permits

DATA REQUESTS

DR BIO-21 Please include all information to satisfy applicable permit application requirements: U.S. Army Corps of Engineers (ACOE) 404 Regional General Permit 1, Regional Water Quality Control Board 401 Certification, and 1602 Lake and Streambed Alteration Agreement with CDFW.

a. Please quantify indirect/direct and permanent/temporary impacts to wetlands and/or waters of the state.

b. Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project. Please include names, titles, phone numbers, addresses, email addresses, of anyone contacted with each agency.

c. Include a schedule when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

BACKGROUND: The applicant proposes to seek coverage under the East Contra Costa County (ECCC) Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP).

DATA REQUESTS

DR BIO-22 Please include all coordination to date with the East Contra Costa County Conservancy. Include names, titles, and contact details.

DR BIO-23 Please include discussion as to when the applicant plans to submit an application to ECCC Conservancy.

DR BIO-24 Please include the ECCC HCP Planning Survey Report application and provide data required. https://www.cocohcp.org/226/Application-Materials

BACKGROUND: Wetland Delineation Report

BER Appendix B, Wetland Delineation Report, (TN 254729) – Various revisions and/or clarifications need to be made where indicated in the Data Requests below.

DATA REQUESTS

DR BIO-25 Please resubmit the data forms with readable text. Only a few of the pages are readable.

DR BIO-26 The Wetland Delineation Report references the study area as 78.7 acres. However, the BER states 75.9 acres, and SPPE Application Section 4.4.3.3. states "just under 76 acres." Please explain the difference in the study area boundaries for the two reports and application.

DR BIO-27 Aquatic resources acreage identified on page iii conflicts with Figure 3 of the BER for Seasonal Wetland Drainages, Seasonal Wetland within Drainage, and Unvegetated Drainages. For example, Figure 3 and Table 4 in the BER shows total study area acres for seasonal wetland drainages as .78 and the wetland delineation report shows .714 acres.

DR BIO-28 The proposed Project Area is quantified in the BER as 35.7 acres and the Wetland Delineation Report states 38.0 acres.

DR BIO-29 In BER Table 4, Artificial Basins Constructed in Uplands has a total of 3.27 acres; however, the Wetland Delineation Report Table 4 has 3.312 acres for Artificial Features Constructed in Uplands. Please clarify.

BACKGROUND: Appendix C, Rare Plant Survey Report (TN254729)

DATA REQUESTS

DR BIO-30 Please indicate whether reference sites were visited.

DR BIO-31 Please include the resume of the botanist who performed protocol level plant surveys.

BACKGROUND: SPPE Application (TN 254728), Section 4.2 Current Conditions.

DATA REQUESTS

DR BIO-32 Please include a discussion about recent fires and identify which trees are being removed, or have already been removed.

DR BIO-33 Please include a discussion about which portions of the property are being routinely mowed.

DR BIO-34 Please include a discussion about the homeless encampment within the perennial wetland drainage area. Has there been any damage (changes in water quality, etc.) within the drainage to alter the results of the previous survey?

BACKGROUND: SPPE Application (TN 254728), Section 4.4 Biological Resources

DATA REQUESTS

DR BIO-35 SPPE Application Section 4.4.3.1 refers to cited references being in Section 4.4.7. However, this should read 4.4.6.

DR BIO-36 SPPE Application Section 4.4.3.1 should include the initial wetland delineation surveys done in Spring 2019.

DR BIO-37 SPPE Application Section 4.4.3.3, Study Area Habitats, the paved/developed areas are listed as 13.48 ac.; however, Figure 3 in the BER (TN 254729) lists it as 13.49 ac. Please revise accordingly for consistency.

DR BIO-38 SPPE Application Page 4.4-28 references Figure 11 for the potential breeding pond for California tiger salamander (CTS); however, Figure 10 identifies the pond. Please edit accordingly.

DR BIO-39 Identify what the conditions were like during the habitat assessment surveys and subsequent surveys. SPPE Application page 4.4-28 states 2018 wet season surveys were done but page 36 of the BER (TN 254729) states 2019 wet season surveys. Please clarify. Also, have any surveys been conducted since those dates?

DR BIO-40 SPPE Application page 4.4-31, please include a statement that if any bee nests are found that the City and CDFW will be coordinated with for appropriate actions.

a. Please ensure City is included in all coordination efforts identified throughout

the application.

DR BIO-41 SPPE Application 4.4-34, references PDMs BIO-8 and BIO-9, further in the paragraph it discusses PDMs BIO-9 and BIO-9, please correct numbering.

DR BIO-42 SPPE Application page 4.4-37, the acreage amounts for seasonal and perennial wetlands do not match BER Figure 3 in Appendix C (TN 254729).

DR BIO-43 SPPE Application page 4.4-38, since RWQCB may require separate mitigation measures apart from the HCP/NCCP, the conclusion statement that "No additional mitigation is required" may not apply to RWQCB. Separate these out so it is clear that the previous statement that RWQCB may require additional measures still may apply.

DR BIO-44 SPPE Application Table 4.4-4 states a landscaping plan in consultation with the City will be implemented to comply with General Plan Policy 9-P-2. Please provide a copy of this plan, or a timeline of when this will occur.

DR BIO-45 SPPE Application Table 4.4-4, please include the number of feet that the project will encroach upon the PG&E easement.

DR BIO-46 SPPE Application page 4.4-42 references biological resources detailed in Section 4.4.6; however, that is the References Cited section. Please correct the reference.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Authors: Lauren DeOliveira, Roger Hatheway

BACKGROUND: Revised Figure 3 Needed

The archaeological and built environment inventory report (Inventory Report) includes Figure 3 on page 23 depicting survey coverage (ECORP 2024), however, the archaeology survey coverage depicted does not extend to the 200-foot archaeology survey buffer.

DATA REQUEST

DR CUL-1 Please revise Figure 3 in the inventory report to show survey coverage extending to the 200-foot archaeology survey buffer boundary.

BACKGROUND: Revised Figure 6 and Appendix D Figure Needed

The Inventory Report includes Figure 6 on page 35 and a Cultural

Resources Overview figure in Appendix D depicting recorded and noted resources (ECORP 2024). CEC Staff assumes these are survey results maps, although the current figures are difficult to interpret.

DATA REQUEST

DR CUL-2 Please revise Figure 6 in the inventory report and the overview figure in Appendix D to include a clear legend indicating which resources are recorded versus noted and change the basemap to a USGS Topo basemap at the 1:24,000 scale. If any resources are previously recorded, please include their Primary number on the figures.

BACKGROUND: New Figures Needed - Record Search Request and Results

The Inventory Report does include the record search request form and copies of the associated reports and site records in the appendices, however, maps depicting the record search request area and record search results are not provided.

DATA REQUESTS

DR CUL-3 Please provide the map included with the record search request depicting the project area and record search buffer on a USGS topo basemap at the 1:24,000 scale.

DR CUL-4 Please provide a map, or maps, showing the record search results depicted on a USGS topo basemap at the 1:24,000 scale.

REFERENCES

ECORP 2024 – ECORP Environmental Consulting, Inc. (ECORP). *Archaeological and Built Environment Resources Inventory Report for the AVAIO Pittsburg Data Hub Project, Contra Costa County, California*. Confidential report prepared for Energy Delivery Solutions, San Francisco, CA. February 2024.

HAZARDS AND HAZARDOUS MATERIALS

Author: Steve De Young

BACKGROUND: Appendix F, Phase I ESA and Limited Soil Screening Report (TN 254730)

The applicant included a Phase I Environmental Site Assessment (dated January 2023) prepared by WSP USA Inc. and included as Appendix F of the SPPE

Application. Note that the SPPE Application submittal date is February 28, 2024. Application Section 1.6, Term of Report Viability states, "This Phase I ESA is viable for one year provided key components are updated within 180 days prior to the date of acquisition of the subject property. Note that the date of the report generally does not represent date of the acquisition of key components and should not be used when evaluating compliance with the 180-day or one-year all appropriate inquiries requirements."

Phase 1 Section 3.5, Additional Environmental Records Sources states, "WSP submitted a public records request to the City of Pittsburg City Clerk on January 4, 2023, for the subject property. As of the date of this assessment, a response has not been received from the City Clerk. Information obtained from the City Clerk is expected to contain local building and land records. This limitation is not expected to be significant due to available aerial photographs, topographic maps, historical building records, and historical city directories of the subject property." The Phase 1 ESA further notes the former Delta View Golf Course closed in 2018 and that individuals with knowledge of the historic operations of the Golf Course were not available for interviews. Finally, there is an indication that the City of Pittsburg undertook building demolition activities in 2018 of the Golf Course structures.

The Preliminary Geotechnical Report, Section 3.1, Site Description states, "Based on various USGS historic topographic maps of the area dating as far back as 1906 (Figure 8), it is suspected that there may be two existing buried storm drainpipes that traverse the site (Figure 4, 6, and 7). One is located near the southwest corner of the proposed substation site which likely traverses underneath the Contra Costa Canal and runs serpentine northward below the depressed ground axis of the former natural drainage. The other is located from just west of the northwest corner of the planned generator platform and runs eastward below the northern end of the planned data halls toward the former golf course ponds near the east property line. The actual location and state of these storm drainpipes is uncertain." It does not appear these drainpipes were addressed in the Phase 1 ESA.

DATA REQUESTS

DR HAZ-1 As noted above, the project Phase 1 ESA is dated January 2023, and it does not appear that the Phase 1 ESA was updated between January 2023 and the submittal of the SPPE Application in February 2024. As such, please update the Phase 1 ESA in accordance with relevant ASTM E1527-21 standards and requirements.

DR HAZ-2 As part of the Phase 1 ESA update, please submit an additional public records request to the City of Pittsburg City Clerk for the subject property including any records the City may possess regarding the 2018 golf course demolition activities. Please include any locations of pesticide/herbicide storage areas and the methods used to manage these chemicals during the golf course demolition activities.

DR HAZ-3 With regard to the potential for two existing buried storm drainpipes in the area of the proposed project, please provide a figure in the updated Phase 1 ESA with the approximate location of the drainpipes and discuss their potential as possible sources of contamination.

BACKGROUND: Refueling Spill/Leak Containment

SPPE Application (TN 254728) Section 2.2.10, Hazardous Materials Management, indicates that "There are no loading/unloading racks or containment for re-fueling events; however, a spill catch basin is located at each fill port for the generators. To prevent a release from entering the storm drain system, storm drains will be temporarily blocked off by the truck driver and/or facility staff during fueling events. Rubber pads or similar devices will be kept in the generation yard to allow quick blockage of the storm sewer drains during fueling events.

To further minimize the potential for diesel fuel to come into contact with stormwater, to the extent feasible, fueling operations will be scheduled at times when storm events are improbable.

Warning signs and/or wheel chocks will be used in the loading and/or unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed transfer lines. An emergency pump shut-off will be utilized if a pump hose breaks while fueling the tanks. Tanker truck loading and unloading procedures will be posted at the loading and unloading areas."

DATA REQUESTS

DR HAZ-4 Please provide a description of the spill catch basin located at the fill ports for the generators, including the volume of fuel these basins can contain.

DR HAZ-5 Please provide a description of the procedures for cleaning up any spills/overflow within these catch basins.

DR HAZ-6 Please provide a description of procedures in the event of fuel leaks during project operation.

BACKGROUND: Diesel Fuel Storage Capacity

SPPE Application (TN 254728) Section 2.2.6 states "The bottom generator of each stacked pair will have an approximately 10,400-gallon diesel fuel storage tank to serve both of the generators. The upper generator in the stacked configuration will have a day tank with a storage capacity of approximately 500 gallons. Approximately 9,700 gallons for a stacked pair of generators are required for 24-hour operation. The generators would have a combined diesel fuel storage capacity of approximately 368,600 gallons, which is sufficient to provide more than 24 hours of emergency generation at full electrical worst case demand of the PDH."

Based on the above, there are eighteen 10,400-gallon diesel fuel storage tanks that serve the emergency 36 diesel generators. One additional storage tank (approximately 5,200-gallons) is for house load at the data center. It appears the total storage capacity is approximately 192,400 gallons versus the stated 368,600 gallons.

DATA REQUEST

DR HAZ-7 Please verify the total combined diesel fuel storage capacity of 368,600 gallons.

BACKGROUND: Location, Volume, and Refilling of the DEF Tanks'

Diesel Exhaust Fluid (DEF) is used as part of the diesel engine combustion process to meet the emissions requirements. Each enclosure will have a 550-gallon DEF tank. Dosing is addressed at each generator within the enclosure.

DATA REQUESTS

DR HAZ-8 Please provide an explanation of the term "Dosing is addressed at each generator within the enclosure."

DR HAZ-9 Please provide an estimate of how often these tanks will need to be refilled during operation of the generators as well as the total volume of DEF to be stored on site.

DR HAZ-10 Please provide a discussion of the safety measures (including secondary containment) that would be undertaken to prevent spills or leaks during the filling of the DEF tanks during commissioning and operation of the project.

BACKGROUND: Site Management Plan (SMP)

The Phase 1 ESA (Appendix F, TN 254730) states, "Prior environmental reports on the former U.S. Army Camp Stoneman established in 1942 and deactivated in 1954 identified the former Small Arms Ranges to be overlapping with the subject property area. Spent bullets and mortar rounds have been found in close proximity to the subject property. Historical use of the subject property as a shooting range may have incurred metal impacts on soil, soil vapor, and groundwater. Military bases and defense sites are generally associated with releases of hazardous substances and pollutants, discarded munitions, munitions constituents, and unexploded ordnance. However, a soil investigation conducted 0.5 miles north of the subject property in 2006 identified no potential contaminants of concern. No unexploded ordnances have been found at the subject property."

The 2009 Preliminary Assessment/Site Inspection (PA/SI) designated the site as No Further Department of Defense Action Indicated (NDAI). DTSC concurred with the findings of the SI Report with two exceptions. DTSC did not concur that further munition constituent sampling was not needed in the Training Mortar Recovery Area. DTSC did not concur with the NDAI recommendation for the 1000-inch rifle range.

SPPE Application (TN 254728) Section 2.4.6 presents a discussion of Applicant's proposed HAZ-1 regarding the preparation of a Site Management Plan (SMP) to be followed during demolition and construction. The potential for unexploded ordinance (UXO)" does not appear to be addressed in Applicant's proposed HAZ-1 even though this possibility exists during excavation activities.

DATA REQUEST

DR HAZ-11 Please provide a discussion of how the SMP will address UXO during site construction activities including initial site excavation.

BACKGROUND: Construction Hazardous Materials

SPPE Application (TN 254728) Section 4.9.3.1 states, **"**During the construction phase of the project, the only hazardous materials used would be paints, cleaners, solvents, gasoline, motor oil, welding gases, and lubricants. When not in use, any hazardous material would be stored in designated construction staging areas in compliance with local, state, and federal requirements. Any impacts resulting from spills or other accidental releases of these materials would be limited to the site due to the small quantities involved and their infrequent use, hence reduced chances of release. Temporary containment berms would also be used to help contain any spills during the construction of the project."

DATA REQUEST

DR HAZ-12 Please describe how much fuel (gasoline and diesel) for construction equipment and vehicles will be stored onsite during construction and where refueling will occur. Will any repair of vehicles or equipment occur on-site?