

DOCKETED	
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Description:	Email follow-up requesting information on water resources (drill cuttings pond) sent on March 10, 2025
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Follow-up Requests on Water Resources - Drill Cuttings Pond for Willow Rock Energy Storage Center (21-AFC-02)

From Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>

Date Mon 3/10/2025 9:36 AM

To Laurel Lees <laurel.lees@hydrostor.ca>; Curt Hildebrand <curt.hildebrand@hydrostor.ca>

Hi Laurel and Curt,

As a follow-up to our call with the Lahontan RWQCB on February 26, 2025, where the drill cuttings pond activity and SWRCB Water Quality Order 2003-0003-DWQ was raised, please see below the associated information request.

Please let me know if you have any questions.

WATER RESOURCES

The applicant's supplemental application for certification (AFC) for the Willow Rock Energy Storage Center (WRESC) filed on March 1, 2024, states in part that *"a lined drill cuttings pond will be required that will hold up to approximately three times the shaft volume in water to support the boring operations"*, during two phases of advanced compressed air energy storage (A-CAES) cavern access shaft installation: 1) Drilling access shafts for cavern construction 2) Drilling access shafts to initiate A-CAES cavern operation (TN 254806, Section 2.1.11, p.p. 2-17 & 2-18).

On July 19, 2024, CEC staff notified the Lahontan Regional Water Quality Control Board (LRWQCB) that a complete supplemental AFC for the WRESC had been received and requested a review of the supplemental AFC package with respect to whether waste discharge requirements (WDRs) would be necessary (TN 258495).

On August 7, 2024, LRWQCB staff responded with initial comments which included the request for the following information from the applicant (TN 258495):

1. Specific end use/disposal and characterization of all liquid waste streams including boring/drilling waste.
2. Boring waste may be subject to State Water Resources Control Board (SWCRB) Water Quality Order (WQO) 2003-0003-DWQ.

CEC staff included LRWQCB staff comments with Data Request 3 that was submitted to the applicant on September 23, 2024 (TN 259256).

The applicant's response to Data Request 3 on October 23, 2024 (TN 259675) did not address drill cutting ponds coverage under the SWRCB water quality order 2003-0003-DWQ.

During a call on February 26, 2025, with the applicant, LRWQCB and CEC staff raised again that the drill cuttings ponds activity would need to be permitted under SWRCB Water Quality Order 2003-0003-DWQ.

On March 4, 2025, LRWQCB staff provided the information they would need to evaluate the drill cutting ponds with respect to Statewide General Water Quality Order WQO No. 2003-0003-DWQ. Please also reference:

DATA REQUEST

1. Verify the low threat category for the proposed waste discharge from table 1 of WQO 2003-0003-DWQ. Definitions to the discharge categories are in Attachment 1.
2. General description for how the waste will be generated.
3. Approximate volume of waste to be discharged.
4. What pollutants or constituents could be present in the waste discharge and their approximate concentration.
5. Answers to questions VII-XV on the Statewide General Waste Charge Requirements (page 15 of this pdf: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf).
6. A project map, to scale, showing the location and size of the proposed discharge location on the ground.
7. A Discharge Monitoring Plan, as described in Provision C.6 of WQO 2003-0003-DWQ, and reiterated here:
 1. All pollutants believed to be present in the discharge**
 2. Approximate concentration of pollutants in the discharge
 3. Monitoring locations
 4. Monitoring frequencies
 5. Report schedule (dates that reports will be submitted to the Regional Board)

**Material Safety Data Sheets (MSDS) and additional laboratory analysis may be required to evaluate the discharge and approve the DMP.

Thank you,
Kaycee

Kaycee Chang (she, her, hers)

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