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Document Title:	Consolidated Email Responses to CEC Staff on Lahontan's February 26, 2025 Request for Additional Information (TN # 261932)
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Consolidated Email Responses to CEC Staff on
Lahontan's February 26, 2025 Request for Additional Information
(TN #: 261932)

Applicant's Consolidated Responses: March 12, 17, and 19, 2025

129. Lahontan RWQCB Requests

Response provided 3/12/2025*:*

In working with CEC Staff and the Lahontan RWQCB, including an additional information exchange on March 6, 2025, Hydrostor has decided to remove the evaporation pond and reverse osmosis system as potential project design features. Instead, most water created from operations of the facility will be reused in the system immediately. We are evaluating options to manage residual volume with the objective of minimizing potential haulage offsite, including treating the water for reintroduction to the process. If required, any volume will be hauled offsite to an appropriate treatment facility in compliance with all applicable laws, ordinances, regulations, and standards.

Additional information provided 3/17/2025*:*

For example, there could be zero to 250,000 gallons per year of water to be hauled offsite. Assuming a tank of 21,000 gallons, then conservatively there could be up to an additional 12.5 truck trips per year. The potential additional truck trips would be a *de minimis* increase (i.e., that would not affect the Air Quality and Transportation sections of the PSA).

Additional information provided 3/19/2025*:*

See Air Quality calculations associated with the most conservative / worst case scenario of hauling 250,000 gallons of water offsite to a facility 27 miles away in Palmdale 13 times per year using Heavy Duty Diesel vehicles:

Hydrostor-WRESC Wastewater Haul Emissions

	Input Data	
# of Hauls per Year:	13	
One-way Haul Distance: mi	27	
Round Trip Distance: mi	54	assumes vehicle is dedicated by contract hauler for round trip charges
Total Annual Haul Distance: mi	702	
Vehicle Type:	HDDT	

	Heavy Duty Diesel Truck Data							
	NOx	**CO**	**VOC**	**SO2**	**PM10 Exh**	**PM10 TBW**	**PM2.5 Exh**	**PM2.5 TBW**
Emissions Factors[a], g/mile	1.5633	0.0608	0.1859	0.0145	0.0292	0.1116	0.0279	0.0355
Annual Emissions, lbs/yr	2.4194	0.0941	0.2877	0.0224	0.0452	0.1727	0.0432	0.0549
Annual Emissions, tons/yr	1.210E-03	4.705E-05	1.439E-04	1.122E-05	2.260E-05	8.636E-05	2.159E-05	2.747E-05

[a] 2025 emission factors for Kern County from the CARB Emission Factors model (EMFAC2021 v1.0.2).

We anticipated this worst case scenario would be *de minimis* (not substantive) to the Air Quality and Transportation sections, and it is indeed:

- this additional 2.4lbs of NOX per year is within the *accuracy* level of the Air Quality analysis, not the *impact* level.
- this conservative estimate of 27 miles of VMT is, on average, 1 additional truck trip per month that could be hauled during non-peak times and have no impact on LOS traffic conditions.

Thank you,

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Laurel Lees

Senior Director, Development – Permitting (North America)