



**Sacramento
Cogeneration
Authority**

P.O. Box 15830, Sacramento, CA 95852-1830 916/732-5218

**DOCKET
93-AFC-2**

DATE: MAY 31 1994

REC'D: MAY 31 1994

Procter & Gamble Cogeneration Project

SCA 94-105

May 31, 1994

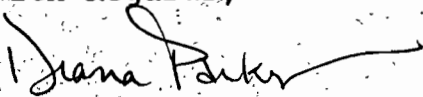
Mr. Darrel "H" Woo
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Attn: Docket Unit

RESPONSES TO CULTURAL RESOURCES 2, PALEONTOLOGIC RESOURCES 2, NOISE 1, AND SOILS 1 PROPOSED CONDITIONS OF CERTIFICATION AND REVISED FIGURE 6.9-1 FOR THE PROCTER & GAMBLE COGENERATION PROJECT (Docket No. 93 AFC 2)

Dear Mr. Woo:

Please find enclosed revised language to the proposed conditions of certification for the conditions cited above. Also enclosed is revised Figure 6.9-1 reflecting the transmission line route amendment submitted to the CEC previously. Please telephone if you have any questions.

With Regards,



Diana Parker
Environmental Specialist

Enclosures

cc: Ron Simms, Walsh
Rich Chapman, B&V

**SACRAMENTO COGENERATION AUTHORITY
PROCTER & GAMBLE COGENERATION PROJECT
COMMENTS ON APRIL 15, 1994 PRELIMINARY STAFF ASSESSMENT**

Cultural Resources

CUL-2 on page 335 of the PSA and the revised version of CUL-2 distributed by the CEC at the May 16th PSA workshop indicate that the project owner is to ensure that all construction workers who operate ground disturbing equipment receive training on how to recognize and report cultural resources discovered in the field during construction. The "Verification" procedure states that the project owner shall provide the CEC with a signed letter which confirms that the training has been provided to the workers. The signed letter is to be provided to the CEC at least two weeks prior to start of construction.

Depending on their specific crafts, project construction workers will start work at the site during various phases of the construction period. Consequently, it may not be feasible to provide training to all construction workers at the initiation of construction. Likewise, it would not be feasible to provide documentation of cultural resources training to the CEC two weeks prior to project construction because worker training and orientation are typically provided on the first day of work at the site rather than several weeks in advance of construction start-up. SCA agrees with providing cultural resources training to construction workers, but suggests that the timing, method, and reporting requirements of the cultural resources training efforts be refined to more closely match the schedule for other worker training (i.e., at the start of construction). The following language for CUL-2 is recommended.

"Prior to the start of construction on the Procter & Gamble project, the project owner's designated cultural resources specialist will provide overall guidance for protection and management of any cultural resources encountered during ground disturbance. The project owner will ensure that all workers who operate ground disturbing equipment are instructed on how to recognize cultural resources in the field and will provide the workers with a set of procedures for reporting any such resources that may be discovered during project-related ground disturbance.

At least 30 days prior to the start of ground disturbing activities, the project owner shall submit to the CEC CPM for review and approval a description of the instruction to be provided to project construction workers and the set of procedures the workers are to follow when a cultural resource is discovered. In the first compliance report, after the start of project construction, the project owner shall provide the CEC CPM with a signed letter stating that the instruction has been provided to the construction workers (those who started on the first day of construction) during the general worker orientation.

The letter shall include a list of the workers who received the cultural resources training. For subsequent project construction phases, the project owner shall list in its Monthly Compliance Report any additional workers who received the cultural resources training."

Paleontologic Resources

PAL-2 on page 205 of the PSA and the revised version of PAL-2 distributed by the CEC at the May 16th PSA workshop indicate that the project owner is to ensure that all construction workers who operate ground disturbing equipment receive training on how to recognize and report paleontologic resources discovered in the field during construction. The "Verification" procedure states that the project owner shall provide the CEC with documentation which confirms that the training has been provided to the workers. The documentation is to be provided to the CEC at least two weeks prior to start of construction.

Depending on their specific crafts, project construction workers will start work at the site during various phases of the construction period. Consequently, it may not be feasible to provide training to all construction workers at the initiation of construction. Likewise, it would not be feasible to provide documentation of paleontologic resources training to the CEC two weeks prior to project construction because worker training and orientation are typically provided on the first day of work at the site rather than several weeks in advance of construction start-up. SCA agrees with providing paleontologic resources training to construction workers, but suggests that the timing, method, and reporting requirements of the paleontologic resources training efforts be refined to more closely match the schedule for other worker training (i.e., at the start of construction). The following language for PAL-2 is recommended.

"Prior to the start of construction on the Procter & Gamble project, the project owner's designated paleontologic resources specialist will provide overall guidance for protection and management of any paleontologic resources encountered during ground disturbance. The project owner will ensure that all workers who operate ground disturbing equipment are instructed on how to recognize paleontologic resources in the field and will provide the workers with a set of procedures for reporting any such resources that may be discovered during project-related ground disturbance.

At least 30 days prior to the start of ground disturbing activities, the project owner shall submit to the CEC CPM for review and approval a description of the instruction to be provided to project construction workers and the set of procedures the workers are to follow when a paleontologic resource is discovered.

In the first compliance report after the start of project construction, the project owner shall provide the CEC CPM with a signed letter stating that the instruction has been provided to the construction workers (those who started on the first day of construction) during the general worker orientation. The letter shall include a list of the workers who received the paleontologic resources training. For subsequent project construction phases, the project owner shall list in its Monthly Compliance Report any additional workers who received the paleontologic resources training."

NOISE-1 proposes that the original telephone number established at the time of construction be maintained throughout the life of the project. SCA believes that it is reasonable to expect that the telephone number could change once the plant phases from construction to operation. SCA also believes that it is appropriate to notice any change in telephone number. The following amendment to proposed condition NOISE-1 addresses SCA's concern.

-delete "This telephone number should be maintained for the life of the project.

-add "For a period of ten days prior to any change in the telephone number, the project owner shall publish a telephone number in the local newspaper(s) for use by the public to report any undesirable noise conditions associated with the Procter and Gamble cogeneration project.

-amend "advertisement" under Verification to read "advertisement(s).

SOILS-1 SCA intends to meet the landscaping and irrigation requirements of the City of Sacramento. Because SCA is interested in planting species that suit the climate, soils, and irrigation system, SCA proposes that the line in the first bullet on page 190 be revised from "The type and number of species that may be planted include" to "The type and number of species to be planted may include, but are not limited to, the following".

SOILS-1 Because the City of Sacramento is responsible for reviewing and approving grading and erosion control plans, revise the first paragraph of SOILS-1 as follows:

Prior to initiation of site grading or earthmoving activities, the project owner will submit grading and erosion control plans to the City of Sacramento Building Official for review and approval.

The Verification would remain the same in that the project owner would be submitting the plans approved by the City of Sacramento to the CEC CPM prior to the start of grading.

STATE OF CALIFORNIA

State Resources Conservation
and Development Commission

In the matter of:)	Docket No. 93-AFC-2
)	
Application for Certification)	PROOF OF SERVICE
of the Sacramento Cogeneration)	(rev. 12/3/93)
Authority's Procter & Gamble)	
Cogeneration Project)	
)	

PROOF OF SERVICE

I, Evangeline B. Parchamento, declare that on May 31, 1994, I deposited copies of the attached Responses to Cultural Resources 2, Paleontologic Resources 2, Noise 1, and Soils 1 Proposed Conditions of Certification and Revised Figure 6.9-1 for the Procter & Gamble Cogeneration Project (Docket No. 93-AFC-2), in the United States mail at Sacramento, California, with first class postage thereon fully prepaid and addressed to the following:

APPLICANT

INTERESTED AGENCIES

Ms. Susan Strachan, Manager
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Division Chief
Sacramento Metro AQMD
8411 Jackson Road
Sacramento, CA 95826

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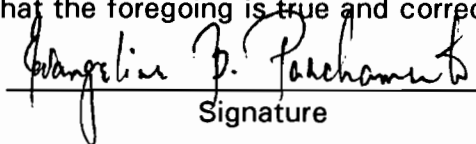
Ray Menebroker, Chief Project
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Citrus Heights, CA 95610-7632

CALIFORNIA ENERGY COMMISSION
(Docket Unit - 12 copies required)

Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814

I declare under penalty of perjury that the foregoing is true and correct.



Signature

Attachment