DOCKETED	
Docket Number:	15-AFC-02
Project Title:	Mission Rock Energy Center
TN #:	214623
Document Title:	Data Requests, Set 2 (Nos. 132 - 133)
Description:	Mission Rock Energy Center Data Requests, Set 2 (Nos. 132 - 133), 15-AFC-02
Filer:	Mike Monasmith
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	12/2/2016 1:37:32 PM
Docketed Date:	12/2/2016

CALIFORNIA ENERGY COMMISSION

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STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., Governor



December 2, 2016

Mitch Weinberg Calpine Company 4160 Dublin Boulevard, Suite 100 Dublin, CA. 94568

RE: MISSION ROCK ENERGY CENTER (15-AFC-02) DATA REQUESTS, SET 2 (Nos. 132 - 133)

Dear Mr. Weinberg;

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified herein. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the project will result in significant impacts, 3) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 4) assess potential mitigation measures.

This request is being made in the areas of Hazardous Materials Management (No. 132) and Project Description (No. 133). Written responses to the enclosed data requests are due to the Energy Commission on or before January 3, 2017.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to both Commissioner Karen Douglas, Presiding Committee Member for the Mission Rock Energy Center, and me, within 20 days of receipt of this letter. The notification should contain the reasons for not providing the information, the need for additional time, or the grounds for any objections. If you have any questions, please call me at (916) 654-4894, or E-mail me at: mike.monasmith@energy.ca.gov.

Sincerely,

Mike Monasmith Siting Project Manager

Enclosure: Data Requests, Set 2

MISSION ROCK ENERGY CENTER (15-AFC-02) DATA REQUESTS, SET 2 (Nos. 132 - 133)

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Technical Area: Hazardous Materials Management

Author: Dr. Alvin Greenberg

Background

The project would require the construction and operation of a new natural gas pipeline as described in the AFC in Sections 1.3, 2.1.7, and 4 and shown in Figure 1.2-2. The AFC states (Section 4, page 4-1) that it is expected that "SoCalGas will construct, own and operate the new pipeline". Additionally, AFC Appendix 2B contains a July 2014 preliminary engineering study by SoCalGas assessing two natural gas pipeline routing alternatives and costs. The applicant has presented the "railroad easement route" as the preferred alternative described in the AFC.

The Ventura County Sheriff's Office staff at the Todd Road Jail, in a meeting with Energy Commission staff, described and discussed the concerns the Sheriff's Office has about the route of the natural gas pipeline as proposed. The section of the route that would pass through County Jail land on Shell Road could place in jeopardy the wastewater pipeline that transports wastewater from the jail on the immediate north side of Shell Road to the wastewater treatment plant located immediately on the south side of Shell Road. The proposed natural gas pipeline would have to be placed either above or below the existing wastewater pipeline as they cross perpendicular to one another. The Sheriff's Office pointed out that any accidental failure of the critically important wastewater pipeline due to inadvertent damage caused by a backhoe or other apparatus during the construction of the natural gas pipeline, or any need to repair or replace the natural gas pipeline, or a leak, fire, or explosion of the natural gas pipeline could result in a terribly disruptive interruption of sanitary facilities use at the jail of an unknown duration. It was emphasized that any interruption, no matter how short, could be disastrous to an incarcerated population of around 900 inmates. Plus, future expansion of the jail with a 65-bed hospital wing to the north of the existing jail structure and another inmate-housing facility on land directly south of the existing structure and up against the north side of Shell Road would only add to the gravely misfortunate nature of a disruption in the use of sanitary facilities. The Sheriff's Department added that it would be impossible to provide a temporary wastewater pipeline, temporary sanitary facilities (e.g., "port-a-pottys") to the inmate population, move them to a different location temporarily, or expect the inmates to delay using the sanitary facilities or meal preparation, showering, or cleanups. Given the nature of the population at this location, the Sheriff's Office emphasized the importance of the wastewater pipeline and requested that Energy Commission staff explore a different natural gas pipeline route.

Staff believes the concerns raised by the Ventura County Sheriff's Office are reasonable, and that the risk to the wastewater pipeline during construction and operation of the natural gas pipeline is well placed. Accordingly, an investigation of alternative routes should be explored in order to minimize or avoid this potential impact. One need only examine the numerous examples of collateral damage to adjoining pipelines of any nature – including natural gas pipelines – when trenching and excavation are conducted for another pipeline or even for road work. The

instances of natural gas pipeline failures, with resulting catastrophic impacts, are also easily found. Therefore, hazardous materials management staff has explored with other Energy Commission staff potential alternative routes to the natural gas pipeline route identified in the AFC. Staff is requesting that the applicant review this important matter and respond with a further analysis of two proposed alternative routes. Staff needs this additional information in order to be able to complete its assessment of the potential for off-site hazardous materials impacts.

DATA REQUEST

- 132. Please provide an assessment of two potential alternative natural gas pipeline routes:
 - a. Continuation of the "railroad" route proposed in the AFC along the west side of the Todd Barranca until it meets up with the reclaimed water supply line and T-line corridor and then follow that corridor east to the power plant site.
 - b. A route that would place the natural gas pipeline directly from the interconnection with SoCalGas lines 404 & 406 to the start of the reclaimed water supply line, and then following along the reclaimed water supply line and T-line corridor east to the power plant site.

Technical Area: Project Description

Author: Mike Monasmith

Background: Project Site

The project site would require fill material to raise the site 10-feet in order to be 1 foot outside of the 100-year flood plan. Staff has submitted data requests about the borrow site (DR# 90) for the fill material.

DATA REQUEST

133. Please confirm the minimum depth of the fill to be added to the project site to raise the base flood elevation of the project site 10-feet and out of the 100-year flood plain.