

DOCKETED

Docket Number:	16-AFC-01
Project Title:	Stanton Energy Reliability Center
TN #:	218335
Document Title:	RE Potential Law Enforcement Needs for the Stanton Energy Reliability Center (16-AFC-01)
Description:	letter
Filer:	Susan Fleming
Organization:	Energy Commission
Submitter Role:	Commission Staff
Submission Date:	6/14/2017 8:17:14 AM
Docketed Date:	6/14/2017

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



June 14, 2017

Lieutenant Sean Howell
Orange County Sheriff
11100 Cedar Street
Stanton, CA 90600

RE: Potential Law Enforcement Needs for the Stanton Energy Reliability Center (16-AFC-01)

Dear Lieutenant Howell,

The Warren-Alquist Act (Public Resources Code § 25000 et. seq.) gives the California Energy Commission (Energy Commission) the exclusive jurisdiction over the permitting of thermal power plants with a net generating capacity of 50 megawatts (MW) or larger and appurtenant related facilities to serve it. As part of its jurisdiction, the Energy Commission must evaluate a project's conformance with applicable local, state, and federal laws, ordinances, regulations, and standards.

The Energy Commission is considering an application from Stanton Energy Reliability Center LLC to construct, own, and operate the Stanton Energy Reliability Center (SERC or project). The project would be located on two parcels totaling approximately four acres at 10711 Dale Avenue in the city of Stanton. Construction laydown would be on the project site near the corner of Pacific Street and Fern Avenue. Construction parking would be within the parking area at the Bethel Romanian Pentecostal Church, 350 feet south of the SERC site at 10801 Dale Avenue. Construction workers would likely walk north along Dale Avenue across the Union Pacific Railroad (UPRR) tracks and access the site through the Dale Avenue entrance. Staff anticipates proposing a condition of certification to ensure safe crossing across the UPRR railroad tracks.

If the SERC is approved and developed, the project construction would occur over a 12-month period, from November 2018 through October 2019. Commercial operation is expected to start by December 2019.

To assess impacts of the proposed project pertaining to law enforcement, Energy Commission staff requests information on existing law enforcement resources and services in the project area and the estimated need for additional services if the project is approved. Characteristics of the applicant's proposed project that are considered applicable to law enforcement are briefly summarized on the attached form.

From staff's review of the Application for Certification (AFC), staff understands the project site is within the jurisdiction of the Orange County Sheriff Department, under the North Operations Division headquartered at 550 Flower Street in Santa Ana. The California Highway Patrol (CHP) is the primary law enforcement agency for state

highways and roads. In addition to the enclosed needs assessment form, staff has the following question:

1. Does the Orange County Sheriff's Department share jurisdiction with the CHP for portions of State Route 39?

As local law enforcement officials have expressed concerns about construction site security and increased project-related traffic on proposed projects similar to SERC, staff has included an example of the conditions of certification typically proposed on projects like SERC. These conditions of certification require the preparation of a Construction Site Security Plan and an Operation Security Plan to ensure site security, and require the preparation of a Traffic Control Plan to address the movement of workers, vehicles, and materials, including arrival and departure schedules. Please consider these typical conditions of certification as you review the proposed project and complete the enclosed needs assessment form.

More information on the project can be found on the Energy Commission's website at <http://www.energy.ca.gov/sitingcases/stanton/>. The project applicant's AFC is available electronically on the SERC Docket Log at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=16-AFC-01>. Section 5.10 Socioeconomics would be the most pertinent section to review, as well as Section 5.5 Hazardous Materials Handling and Section 5.12 Traffic and Transportation.

Please provide your responses to the needs assessment form and include any comments you may have regarding law enforcement services for the proposed project by June 30, 2017. If helpful, I can send an electronic copy of the needs assessment form. Send your responses to my attention, and if you have any questions about this request, please contact me via email at ellen.lefevre@energy.ca.gov or telephone at 916-651-2907. Thank you in advance for your time and assistance.

Sincerely,

|s|

Ellen LeFevre, Planner II
California Energy Commission
Siting, Transmission, and Environmental Protection Division
1516 Ninth Street, MS 40
Sacramento, CA 95814
ellen.lefevre@energy.ca.gov
Tele: (916) 651-2907

Lieutenant Howell

June 14, 2017

Page 3 of 3

Enclosures:

Local Law Enforcement Needs Assessment Form

Map showing the approximate location of the project site (from the AFC)

Project site plan and elevations (from the AFC)

Typical Hazardous Materials Conditions of Certification

Typical Traffic and Transportation Condition of Certification

Law Enforcement Needs Assessment Form	
Project Characteristics, as Proposed by the Project Applicant	
Address and Site Access:	The site of the proposed power generating facility is 10711 Dale Avenue in the city of Stanton, California. Primary access to the site would be from Dale Avenue and at the corner of Pacific Street and Fern Avenue.
Estimated Schedule:	If approved, construction would begin in November 2018 and conclude in October 2019 (12 months). See Table 5.10-8 on page 5.10-11 in the AFC, for a list of the project construction workforce and schedule.
Construction (Traffic and Work Force):	There would be an average construction workforce of 48 workers over the 12-month construction period. During peak construction in June 2019, the construction workforce would total about 78 workers. The project applicant estimates 132 daily car trips by construction workers and it is presumed workers would arrive during the peak morning hour and depart during the peak afternoon hour. There would be an estimated 50 delivery/haul truck trips per day with eight truck trips arriving and departing the site during the peak hours.
Operation (Staff and Traffic):	There would be no operational workers staffed locally on a daily basis. The facility would be remotely monitored and/or operated on a continuous basis. Routine onsite maintenance would typically be done by one to three technicians who would be dispatched to the project site as needed for regular preventive maintenance, reliability and compliance operations testing and inspections, or as dispatched by the remote operator.
Security:	A security plan would be prepared for the Stanton Energy Reliability Center (SERC) that would include a description of site fencing and security gate, evacuation procedures, a protocol for contacting law enforcement in the event of conduct endangering the facility, its employees, its contractors, or the public, a fire alarm monitoring system, measures to conduct site personnel background checks, including employee and routine onsite contractors, consistent with state and federal laws regarding security and privacy, a site access protocol for vendors, and a protocol for hazardous materials vendors to prepare and implement security plans and to ensure that all hazardous materials drivers are in compliance with personnel background security check. The plan would include a demonstration that the perimeter security measures would be adequate. Examples of two typical Conditions of Certification that are applied to projects like SERC have been included for your consideration.
Existing Law Enforcement Resources and Services in the Project Area (attach additional paper if more room is needed to answer questions)	
Names and addresses of the facilities (e.g., law enforcement substations) serving the project area, and distance of closest dispatch facility to the project site:	
Existing staffing levels for facilities serving the project area (including sworn officers and civilians, totals and per shift):	
Estimated response times to the project site:	<p style="text-align: center;">Priority calls:</p> <p style="text-align: center;">Non-Priority calls:</p>
Exchange of general law enforcement responsibilities (e.g., formal and/or informal agreements with local municipalities for provision of services) in the project area:	

Law Enforcement Needs Assessment Form

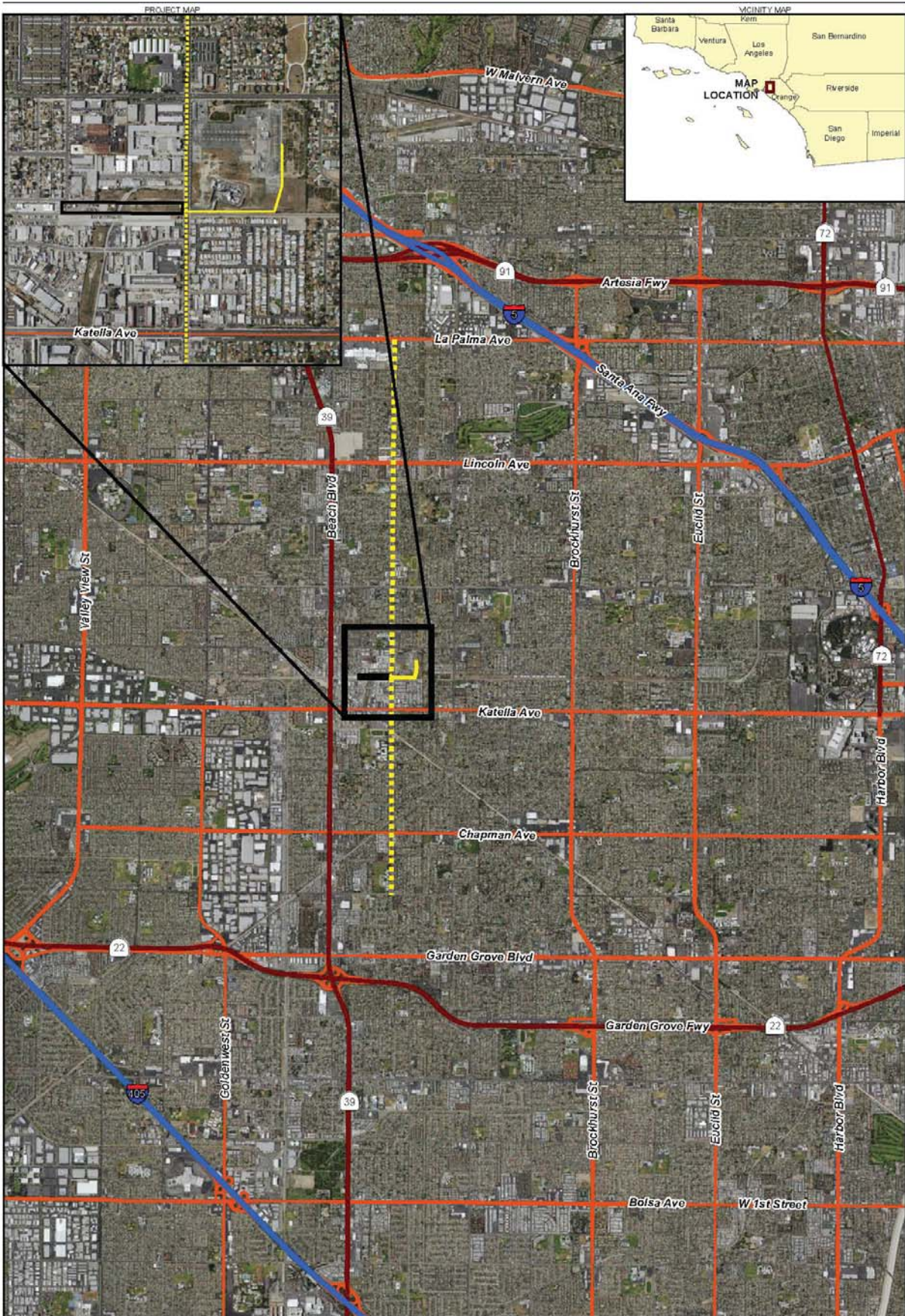
Estimated Need for Law Enforcement Services, Equipment, and Facilities
(attach additional paper if more room is needed to answer questions)

Considering the enclosed Conditions of Certification for site security that staff typically recommends, would there be a need for new or physically altered law enforcement facilities in order to maintain acceptable service ratios, response times or other performance objectives of the law enforcement department?

Please explain any other law enforcement concerns that have not been addressed by this needs assessment form.

Person Completing This Needs Assessment Form

Name:
Title/Position:
Telephone No:
E-mail Address:



Source: Esri World Imagery

LEGEND

- Generator Tie-Line
- Proposed Natural Gas
- - - Pipeline Route Alternatives
- Project Site

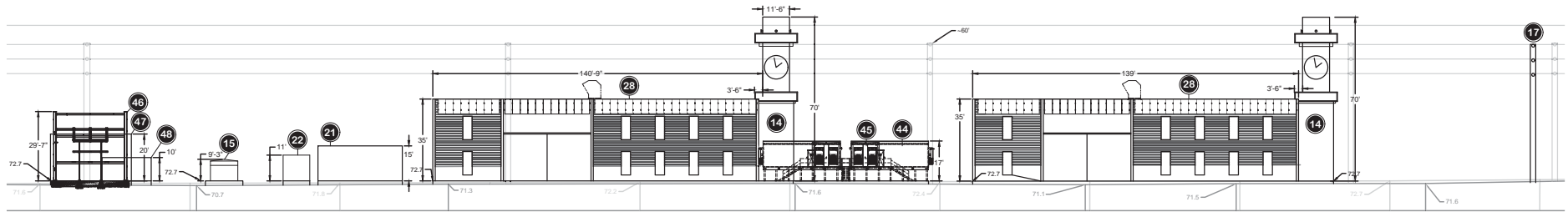
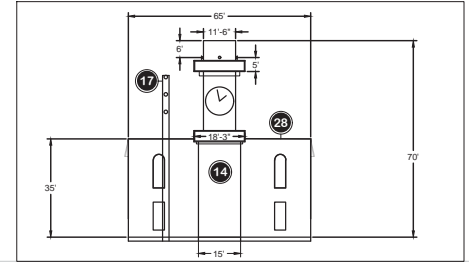


Figure 1.3-1
Project Location
 Stanton Energy Reliability Center AFC
 Stanton, California

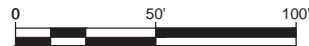
KEYNOTES:

- | | | | | |
|--------------------------------|---|-------------------------------------|-----------------------------------|---------------------------------|
| 1 GAS TURBINE/GENERATOR | 11 AMMONIA INJECTION SKID | 21 FUEL GAS COMPRESSOR (FGC) | 31 WATER FORWARDING SKID | 41 AUX TRANSFORMER (480V) |
| 2 SPRINT SKID | 12 PURGE AIR FANS | 22 FGC L.O. FIN-FAN COOLER | 32 DEMINERALIZED WATER SKID | 42 AUX TRANSFORMER (4160V) |
| 3 FOGGER SKID | 13 GENS ENCLOSURE | 23 GAS EMERGENCY SHUT-DOWN VALVE | 33 REVERSE OSMOSIS SKID | 43 SWITCHGEAR (4160V) |
| 4 WATER INJECTION PUMPS | 14 EXHAUST STACK | 24 FUEL GAS FILTER SKID | 34 DEMINERALIZED WATER TANK | 44 POWER DISTRIBUTION MODULE |
| 5 CLUTCH LUBE OIL SKID | 15 AMMONIA STORAGE TANK & PUMPS | 25 PARCEL 1 STORMWATER LIFT STATION | 35 FIRE HYDRANT | 45 CONTROL MODULE |
| 6 HYDRAULIC START SKID | 16 WAREHOUSE | 26 INVERTER (PCS) | 36 STORMWATER DETENTION TANK | 46 SWITCHYARD |
| 7 FIN-FAN L.O. COOLER | 17 STEEL POLE MOUNTED DISCONNECT | 27 ISOLATION TRANSFORMER | 37 FOGGING WATER DRAIN TANK | 47 GSU TRANSFORMER |
| 8 UTILITY BRIDGE | 18 PORTABLE HAZARDOUS MATERIALS & STORAGE | 28 GT FACILITY ENCLOSURE | 38 OILY WATER WASTE TANK | 48 SWITCHYARD CONTROL |
| 9 PORTABLE HAZMAT STORAGE CART | 19 TRASH ENCLOSURE | 29 BATTERY ENERGY STORAGE SYSTEM | 39 PARCEL 2 STORMWATER COLLECTION | 49 BESS SWITCH GEAR |
| 10 SCR/CO UNIT | 20 GAS MSA YARD (SCG) | 30 BACKFLOW PREVENTER | 40 SWITCHGEAR (15kV) | 50 AIR COMPRESSOR SKID |
| | | | | 51 FIRE ALARM ANNUNCIATOR PANEL |

EAST END VIEW

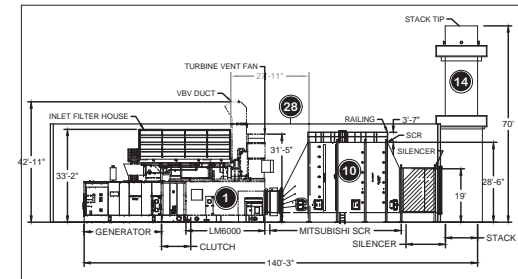


SOUTH SIDE VIEW



SCALE

PRELIMINARY

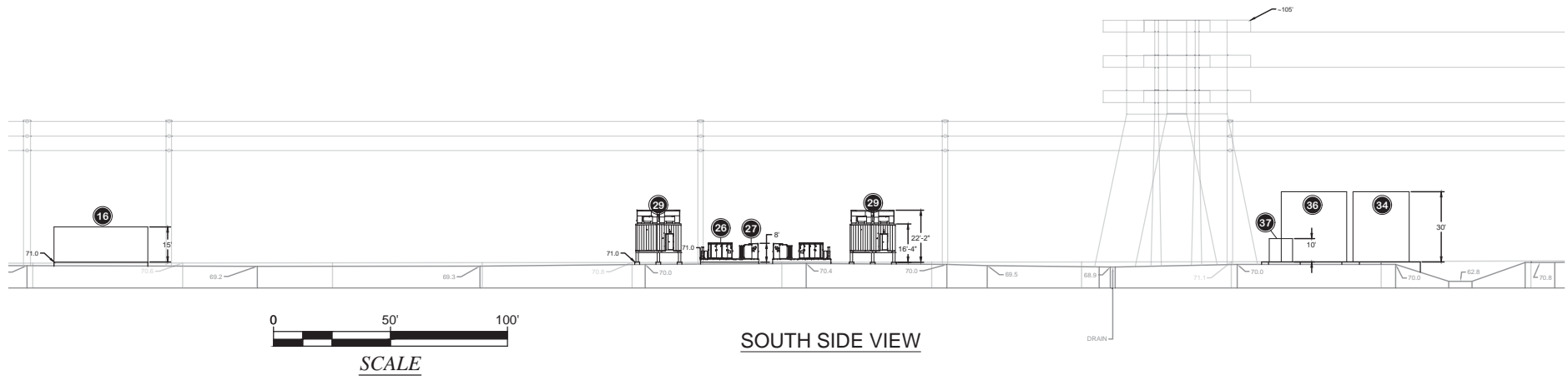


LM6000 EQUIPMENT VIEW

Figure 2.1-2a
Elevations - Parcel 1
 Stanton Energy Reliability Center AFC
 Stanton, California

KEYNOTES:

- | | | | | |
|--------------------------------|---|-------------------------------------|-----------------------------------|---------------------------------|
| 1 GAS TURBINE/GENERATOR | 11 AMMONIA INJECTION SKID | 21 FUEL GAS COMPRESSOR (FGC) | 31 WATER FORWARDING SKID | 41 AUX TRANSFORMER (480V) |
| 2 SPRINT SKID | 12 PURGE AIR FANS | 22 FGC L.O. FIN-FAN COOLER | 32 DEMINERALIZED WATER SKID | 42 AUX TRANSFORMER (4160V) |
| 3 FOGGER SKID | 13 OEMS ENCLOSURE | 23 GAS EMERGENCY SHUT-DOWN VALVE | 33 REVERSE OSMOSIS SKID | 43 SWITCHGEAR (4160V) |
| 4 WATER INJECTION PUMPS | 14 EXHAUST STACK | 24 FUEL GAS FILTER SKID | 34 DEMINERALIZED WATER TANK | 44 POWER DISTRIBUTION MODULE |
| 5 CLUTCH LUBE OIL SKID | 15 AMMONIA STORAGE TANK & PUMPS | 25 PARCEL 1 STORMWATER LIFT STATION | 35 FIRE HYDRANT | 45 CONTROL MODULE |
| 6 HYDRAULIC START SKID | 16 WAREHOUSE | 26 INVERTER (PCS) | 36 STORMWATER DETENTION TANK | 46 SWITCHYARD |
| 7 FIN-FAN L.O. COOLER | 17 STEEL POLE MOUNTED DISCONNECT | 27 ISOLATION TRANSFORMER | 37 FOGGING WATER DRAIN TANK | 47 GSU TRANSFORMER |
| 8 UTILITY BRIDGE | 18 PORTABLE HAZARDOUS MATERIALS & STORAGE | 28 GT FACILITY ENCLOSURE | 38 OILY WATER WASTE TANK | 48 SWITCHYARD CONTROL |
| 9 PORTABLE HAZMAT STORAGE CART | 19 TRASH ENCLOSURE | 29 BATTERY ENERGY STORAGE SYSTEM | 39 PARCEL 2 STORMWATER COLLECTION | 49 BESS SWITCH GEAR |
| 10 SCR/CO UNIT | 20 GAS MSA YARD (SCG) | 30 BACKFLOW PREVENTER | 40 SWITCHGEAR (15KV) | 50 AIR COMPRESSOR SKID |
| | | | | 51 FIRE ALARM ANNUNCIATOR PANEL |



PRELIMINARY

Figure 2.1-2b
Elevations - Parcel 2
 Stanton Energy Reliability Center AFC
 Stanton, California

Typical Hazardous Materials Conditions of Certification

HAZ-7 Prior to commencing construction, a site-specific Construction Site Security Plan for the construction phase shall be prepared and made available to the Compliance Project Manager (CPM) for review and approval. The Construction Security Plan shall include the following:

1. perimeter security consisting of fencing enclosing the construction area;
2. security guards;
3. site access control consisting of a check-in procedure or tag system for construction personnel and visitors;
4. written standard procedures for employees, contractors and vendors when encountering suspicious objects or packages on site or off site;
5. protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency; and,
6. evacuation procedures.

Verification: At least thirty (30) days prior to commencing construction, the project owner shall notify the CPM that a site-specific Construction Security Plan is available for review and approval.

HAZ-8 The project owner shall also prepare a site-specific security plan for the commissioning and operational phases that will be available to the CPM for review and approval. The project owner shall implement site security measures that address physical site security and hazardous materials storage. The level of security to be implemented shall not be less than that described below (as per NERC 2002).

The Operation Security Plan shall include the following:

1. permanent full perimeter fence or wall, at least eight feet high and topped with barbed wire or the equivalent (and with slats or other methods to restrict visibility if a fence is selected);
2. main entrance security gate, either hand operated or motorized;
3. evacuation procedures;
4. protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency;
5. written standard procedures for employees, contractors, and vendors when encountering suspicious objects or packages on site or off site;
 - A. a statement (refer to sample, **Attachment A**), signed by the project owner certifying that background investigations have been conducted on all project personnel. Background investigations shall be restricted to determine the accuracy of employee identity and employment history and shall be conducted in accordance with state and federal laws regarding security and privacy;
 - B. a statement(s) (refer to sample, **Attachment B**), signed by the contractor or authorized representative(s) for any permanent contractors or other technical

contractors (as determined by the CPM after consultation with the project owner), that are present at any time on the site to repair, maintain, investigate, or conduct any other technical duties involving critical components (as determined by the CPM after consultation with the project owner) certifying that background investigations have been conducted on contractors who visit the project site;

6. site access controls for employees, contractors, vendors, and visitors;

7. a statement(s) (refer to sample, **Attachment C**), signed by the owners or authorized representative of hazardous materials transport vendors, certifying that they have prepared and implemented security plans in compliance with 49 CFR 172.880, and that they have conducted employee background investigations in accordance with 49 CFR Part 1572, subparts A and B;

8. closed circuit TV (CCTV) monitoring system, recordable, and viewable in the power plant control room and security station (if separate from the control room) with cameras able to pan, tilt, and zoom, have low-light capability, and are able to view 100% of the perimeter fence, the ammonia storage tank, the outside entrance to the control room, and the front gate; and,

9. additional measures to ensure adequate perimeter security consisting of either:

- A. security guard(s) present 24 hours per day, 7 days per week; **or**
- B. power plant personnel on site 24 hours per day, 7 days per week, and perimeter breach detectors **or** on-site motion detectors.

The project owner shall fully implement the security plans and obtain CPM approval of any substantive modifications to those security plans. The CPM may authorize modifications to these measures, or may require additional measures such as protective barriers for critical power plant components—transformers, gas lines, and compressors—depending upon circumstances unique to the facility or in response to industry-related standards, security concerns, or additional guidance provided by the U.S. Department of Homeland Security, the U.S. Department of Energy, or the North American Electrical Reliability Council, after consultation with both appropriate law enforcement agencies and the applicant.

Verification: At least thirty (30) days prior to the initial receipt of hazardous materials on site, the project owner shall notify the CPM that a site-specific operations site security plan is available for review and approval. In the annual compliance report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and that updated certification statements have been appended to the operations security plan. In the annual compliance report, the project owner shall include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.

Typical Traffic and Transportation Condition of Certification for Traffic Control Plan (From Huntington Beach Energy Project 12-AFC-02)

TRANS-3 Traffic Control Plan, Heavy Hauling Plan, and Parking/Staging Plan

The project owner shall prepare and implement a Traffic Control Plan (TCP) for the HBEP's construction and operations traffic. The TCP shall address the movement of workers, vehicles, and materials, including arrival and departure schedules and designated workforce and delivery routes. The project owner shall consult with Caltrans, the city of Huntington Beach and other applicable local jurisdictions in the preparation and implementation of the Traffic Control Plan (TCP). The project owner shall submit the proposed TCP to Caltrans and applicable local jurisdictions in sufficient time for review and comment, and to the Energy Commission Compliance Project Manager (CPM) for review and approval prior to the proposed start of construction and implementation of the plan. The Traffic Control Plan (TCP) shall include:

- Provisions for redirection of construction traffic with a flag person as necessary to ensure traffic safety and minimize interruptions to non-construction related traffic flow,
- Placement of necessary signage, lighting, and traffic control devices at the project construction site and lay-down areas;
- A heavy-haul plan addressing the transport and delivery of heavy and oversized loads requiring permits from the California Department of Transportation (Caltrans), other state or federal agencies, and/or the affected local jurisdictions including Los Angeles county, Orange county, city of Long Beach, city of Seal Beach, and city of Huntington Beach;
- Location and details of construction along affected roadways at night, where permitted;
- Temporary closure of travel lanes or disruptions to street segments and intersections during construction activities;
- Traffic diversion plans (in coordination with the city of Huntington Beach and Orange County) to ensure access during temporary lane/road closures;
- Access to residential and/or commercial property located near construction work and truck traffic routes;
- Insurance of access for emergency vehicles to the project site;
- Advance notification to residents, businesses, emergency providers, and hospitals that would be affected when roads may be partially or completely closed;
- Identification of safety procedures for exiting and entering the site access gate;
- Parking/Staging Plan for all phases of project construction and operation to require all project-related parking to be on-site or in designated off-site parking areas.

Verification: At least 60 calendar days prior to the start of construction, the project owner shall submit the TCP to the applicable agencies for review and comment and to the CPM for review and approval. The project owner shall also provide the CPM with a copy of the transmittal letter to the agencies requesting review and comment.

At least 30 calendar days prior to the start of construction, the project owner shall provide copies of any comment letters received from the agencies, along with any changes to the proposed development plan, to the CPM for review and approval.