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**CALIFORNIA  
ENERGY COMMISSION**



**CALIFORNIA  
natural  
resources  
AGENCY**

May 18, 2020

SV1, LLC  
C/O Scott A. Galati  
1720 Park Place Drive  
Carmichael, California 95608

**Data Requests Set 3 for Great Oaks South Backup Generating Facility (20-SPPE-01)**

Dear Mr. Galati:

Pursuant to Title 20, California Code of Regulations, sections 1941 and 1716, California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 3, which is necessary for a complete staff analysis of the Great Oaks South Backup Generating Facility (GOSBGF) and associated Great Oaks South Data Center (GOSDC), collectively the "project" under the California Environmental Quality Act (CEQA).

Responses to the data requests are due to staff within 30 days. If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Committee within 20 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please email me at [lisa.worrall@energy.ca.gov](mailto:lisa.worrall@energy.ca.gov).

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/S/

Lisa Worrall  
Senior Environmental Planner

Enclosure: Data Requests Set 3

**GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE  
DATA REQUESTS SET 3**

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# GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3

## AIR QUALITY AND PUBLIC HEALTH

### BACKGROUND

Staff noticed that the receptor number and Universal Transverse Mercator (UTM) coordinates for the maximum exposed individual sensitive receptor (MEIS) shown in Table 4.5-21 of the small power plant exemption (SPPE) application (TN 232466) are not consistent with each other. The UTM coordinates (608080, 4121560) for the receptor #12164 shown in Table 4.5-21 are as shown in the modeling files, which is to the northeast of the project site and close to one of the modeled worker receptors. However, the UTM coordinates (609037, 4120914) shown in Table 4.5-21 are for the receptor #12341, which represents the Los Paseos Elementary School. The modeling files show that the cancer risk at this school would be 1.55 in a million ( $1.55 \times 10^{-6}$ ) during testing and maintenance of the standby engines of the project. The cancer risk modeling files also show that the applicant used age-specific fraction of time at home (FAH) for 3<sup>rd</sup> trimester to 16 years as well as for 16 years to 70 years.

Chapter 11 of the Office of Environmental Health Hazard Assessment (OEHHA) 2012 *Air Toxics Hot Spots Program Risk Assessment Guidelines; Technical Support Document for Exposure Assessment and Stochastic Analysis* states that the time that a person is away from his or her residence can mean either no exposure to a small facility's emissions, or in the case of a facility with a large isopleth footprint, continuing significant exposure. OEHHA notes it is appropriate to consider the fraction of time people spend at home as an adjustment for exposure to carcinogens. However, a good fraction of the time away from residence will be spent at school for the first sixteen years of life and many California schoolchildren attend a local neighborhood school. Therefore, OEHHA recommends that time away from residence be considered as away from facility emissions (no facility cancer risk) for facilities that do not have a school within the  $1 \times 10^{-6}$  or greater cancer risk isopleth. OEHHA recommends no adjustment for time away from residence when there are schools inside the  $1 \times 10^{-6}$  (or greater) cancer risk isopleth. The larger facilities with multiple emissions sources are most likely to have schools within the  $1 \times 10^{-6}$  isopleth and are more likely to cause significant exposure to people while they are away from their residences. Therefore, page 8-5 of the OEHHA 2015 *Air Toxics Hot Spots Program Risk Assessment Guidelines* states that facilities with any school within the  $1 \times 10^{-6}$  (or greater) isopleth should use FAH = 1 for the child age groups (3<sup>rd</sup> Trimester, 0<2 years, and 2<16 years). The applicant needs to revise the cancer risk assessment using FAH = 1 for testing and maintenance of the standby engines to be consistent with the OEHHA guidelines. This applies to any revised health risks assessment requested in Data Request #13 in Data Requests Set 2 (TN 232755).

### DATA REQUEST

65. Please revise the cancer risk assessment for testing and maintenance of the standby engines using FAH = 1 for the child age groups (3<sup>rd</sup> Trimester, 0<2

# GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3

years, and 2 < 16 years). Alternatively, justify that the approach used by the applicant meets OEHHA guidelines.

## BACKGROUND

Page 92 of the SPPE application only shows health risk results for the maximum impacted sensitive/residential receptor (#6444) for construction of the project. Staff needs health risk results for the point of maximum impact (PMI) and maximum exposed individual worker receptor (MEIW) to complete analysis of the project impacts. The applicant also used the age-specific FAH for 3<sup>rd</sup> trimester to 16 years as well as for 16 years to 70 years in the cancer risk analysis for construction of the project. Staff needs to verify that the cancer risks at any school would be less than 1 in a million using FAH = 1, so that the age-specific FAH factors could be used for the cancer risk analysis for construction of the project. This applies to any revised health risks assessment requested in Data Request #13 in Data Requests Set 2 (TN 232755).

## DATA REQUESTS

66. Please provide health risk results for PMI, MEIW, and school receptors for construction of the project.
67. Please verify that the cancer risks at any school would be less than 1 in a million using FAH = 1, so that the age-specific FAH factors could be used for the cancer risk analysis for construction of the project.

## BACKGROUND

Table AQ5-1 in Appendix AQ5 (TN 232467-1) provides a list of sensitive receptors. These sensitive receptors match those in the modeling files starting from receptor #12334. However, the modeling files included more receptors for residential areas and workers. For example, the maximum exposed individual residential receptor (MEIR) with receptor #6493 shown in Table 4.5-21 and MEIW with receptor #3572 shown in Table 4.5-22 of the SPPE application are not listed in Table AQ5-1. In order to verify the modeling results, staff needs all the receptor numbers and UTM coordinates for the residential areas and worker receptors other than those listed in Table AQ5-1.

## DATA REQUEST

68. Please provide all the receptor numbers and UTM coordinates for the residential areas and worker receptors other than those listed in Table AQ5-1.

# **GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3**

## **BACKGROUND**

Staff compared the sensitive receptor locations provided by the applicant and those from the Homeland Infrastructure Foundation-Level Data (HIFLD) website (<https://hifld-geoplatform.opendata.arcgis.com/>). Staff noticed the applicant missed some sensitive receptors in the project area. Staff needs to have the health risk impacts on all the sensitive receptors in the project area to verify the MEIR, MEIW, and MEIS. This applies to health risk assessment for both construction of the project and testing and maintenance of the standby engines.

## **DATA REQUEST**

69. Please provide a complete list of sensitive receptors in the project area and complete a health risk assessment for the project that includes calculated impacts at all the sensitive receptors. This applies to the health risk assessment for construction of the project and testing and maintenance of the standby engines.

# GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3

## CULTURAL/TRIBAL CULTURAL RESOURCES

### BACKGROUND

On April 13, 2020, the applicant filed under request for confidentiality a cultural resources technical report on the proposed project (TN 232859; TN 232727). Staff reviewed the cultural resources technical report and observe that numerous sources of information cited in the text lack bibliographic information in the References section. This missing information hinders staff's ability to verify and use the information contained in the cultural resources technical report.

### DATA REQUEST

70. Provide bibliographic information for the following citations. Staff lists the missing material in the order encountered in the cultural resources technical report (see D'Oro 2018, pages 6-12).

- |                        |                                |
|------------------------|--------------------------------|
| a. USDA (2018)         | o. Winther (1935)              |
| b. Heizer (1967, 1974) | p. Lockhart (1986)             |
| c. Levy (1978)         | q. Skowronek (1999)            |
| d. Bean (1994)         | r. Cartier et al. (1979, 1994) |
| e. Whistler (1977)     | s. Bancroft (1886)             |
| f. Cook (1943)         | t. Beilharz (1971)             |
| g. Kroeber (1925)      | u. Arbuckle (1986)             |
| h. Milliken (1995)     | v. Dawson (1841)               |
| i. Beechey (1968)      | w. Costello (1985)             |
| j. Bickel (1981)       | x. Voss (2005)                 |
| k. Broadbent (1972)    | y. Estudillo (1809)            |
| l. King (1974)         | z. Lambert et al. (1998)       |
| m. Baumhoff (1963)     | aa. Boysen (1976)              |
| n. Garr (1976)         |                                |

# GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3

## **GREENHOUSE GAS EMISSIONS**

### **BACKGROUND**

Table 4.8-1 of the SPPE application summarizes the greenhouse gas (GHG) emissions generated by the operation of GOSDC, with the details provided in Appendix AQ4 (TN 232467-1). The GHG emissions from energy use are significantly lower than those of similar projects. To validate the applicant's work, staff needs the spreadsheet files of the emission estimates with live, embedded calculations to complete the review.

### **DATA REQUESTS**

71. Please provide the basis for the calculation of GHG emissions from energy use, including the carbon intensity factor (lbs/MWh) and the maximum project electrical usage (MWh/year).
72. Please provide the spreadsheet versions of the worksheets in appendices AQ4 with the embedded calculations live and intact, including those for GHG emissions from area, mobile sources, water use, and waste generation.



# GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3

## LAND USE AND PLANNING

### BACKGROUND

Section 2.3.2.1 of the SPPE application describes the data center buildings, stating that the two-story office component would be approximately 49 feet high (53 feet to the top of the parapet). Figure 2.3-1 shows the building elevations. In the figure, there are hexagon icons with numbers from 1–4, which suggests that there is a key missing from the figure. Also, the structures labeled “4” do not appear to correspond to the elevation marking for the penthouse, which is at 72 feet 3 inches.

### DATA REQUESTS

73. Please provide a key for the numbers in the hexagon icons in Figure 2.3-1.
74. Please show what structures correspond to the elevation marking for the penthouse.
75. The top of the coping in Figure 2.3-1 appears to be some number of feet taller than the 49-foot-tall “precast.” Please explain if the top of the parapet (stated to be 53 feet in height) is the same thing as the “sheet metal coping” shown in Figure 2.3-1.