Department of Toxic Substances Control

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September 10, 2007

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REVIEW OF CALIFORNIA ENERGY COMMISSION (CEC) SUPPLEMENTAL DOCUMENTS FOR THE VICTORVILLE 2 HYBRID POWER PROJECT, DOCKET #07-AFC-1.

Dear Mr. Blevins:

The Department of Toxic Substances Control (DTSC) has received your submitted documents for the above-mentioned project. The following project description is stated in your document: "The City of Victorville (City), a municipal corporation in the State of California, submits this Application for Certification (AFC) to construct and operate the Victorville 2 Hybrid Power Project (referred to as the Victorville 2 Project, VV2 Project, or the Project). The Project consists of natural gas-fired combined-cycle generating equipment integrated with solar thermal generating equipment. The combined-cycle equipment will utilize two combustion turbine generators (CTG), two heat recovery steam generators (HRSG), and one steam turbine generator (STG). The solar thermal equipment will utilize arrays of parabolic collectors that heat a working fluid that is then used to generate steam. The combined-cycle equipment is integrated thermally with the solar equipment in that both utilize the Project's single STG. The Project will have a nominal electrical output of 570 MW and commercial operation is planned for the summer of 2010. The approximately 275-acre VV2 Project site is located north of the Southern California Logistics Airport (SCLA), the former George Air Force Base, in the City of Victorville, San Bernardino County, California. The site lies approximately 3.5 miles east of U.S. Highway 395 and approximately 0.5 mile west of the Mojave River. The site is in a portion of the southwestern Mojave Desert known as the Victor Valley." DTSC again provides comments as follows:

1) The AFC should identify any current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances.

2) The AFC should identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the AFC should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

3) The AFC should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No.17 below for more information.

4) Your document states: "Trichloroethylene (TCE) contamination in groundwater associated with the former George Air Force Base (GAFB - now SCLA) was identified as part of the GAFB Superfund site. TCE contamination associated with the GAFB Superfund site was found to extend through the locations associated with the proposed linear facilities near the VVWRA treatment plant. This TCE groundwater plume is present in the lower aquifer (approximately 210 to 250 below ground surface [bgs]) along the routes for the VV2 Project sanitary wastewater pipeline and transmission lines. No other issues of concern were identified. Summary of Findings and Conclusions. The presence of TCE-impacted groundwater near the VVWRA treatment plant is a recognized environmental condition (REC) in association with the VV2 Project linear facilities. Also, the potential was identified for de minimus hazardous materials or wastes (cleaning chemicals, petroleum product residues) to be present in abandoned vehicles and/or abandoned structures on the Project site. Although the depths of excavation associated with installation of VV2 Project linear facilities are not expected to approach the approximately 210 to 250-foot bgs depths where the TCE groundwater contamination exists (e.g., the excavations for Project pipelines are not expected to exceed 6 feet bgs and excavations for the transmission line structures are not expected to exceed 30 feet bgs), the most current data associated with the TCE plume should be obtained from the SCLA. This data should be obtained prior to construction activities associated with the linear facilities to confirm that the depths of TCE contamination are well separated from the depths of Project excavations along the linear routes. Construction planning should include consideration of the potential presence of hazardous materials or wastes (e.g., cleaning chemicals, petroleum product residues) associated with abandoned vehicles and/or abandoned structures on the site. Waste Management .appropriate, additional investigation should be performed to establish the nature and extent of contamination, and identified hazardous materials/wastes (if present) should be managed and disposed in accordance with applicable regulations." Any environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.

5) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the

new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the AFC.

6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property.

7) If buildings, other structures, or associated uses; asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

8) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

9) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

10) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).

11) If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite,

or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (714) 484-5423 to initiate pre-application discussions and determine the permitting process applicable to the facility.

12) If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.

13) Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

14) If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

15) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.

16) If the site was used for agricultural or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

17) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

If you have any questions regarding this letter, please contact Ms.Teresa Hom, Project Manager, at (714) 484-5477 or email at thom@dtsc.ca.gov.

Sincerely,

Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

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CEQA#1629