



July 22, 2008

Chris Davis
Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

DOCKET 06-AFC-10C
DATE JUL 22 2008
RECD. JUL 24 2008

Subject: Starwood Power-Midway, LLC Peaking Project (06-AFC-10)
Air Quality Data Request Responses to Amendment No. 1
URS Project No. 27656131.00700

Dear Mr. Davis:

On behalf of Starwood Power-Midway, LLC, URS Corporation Americas (URS) hereby submits responses to Air Quality Data Requests for Starwood Power-Midway Project Amendment No. 1.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to submit responses to Air Quality Data Requests for Starwood Power-Midway Project Amendment No. 1 on the behalf of Starwood Power-Midway, LLC.

Sincerely,

URS CORPORATION

Angela Leiba
Project Manager

AL:kl

**Starwood Power-Midway, LLC Peaking Project
Amendment 1
Air Quality Data Requests Responses
06-AFC-10**

TECHNICAL AREA: AIR QUALITY

Data Request 1: Considering the worst-case permitted operating potential of 4,000 hours and the limited primary water supply, please provide an estimate of the following regarding wastewater trucking:

- a. Amount of wastewater that would require trucking.
- b. Quantity of wastewater truck trips.
- c. Confirm that the wastewater trucks would be greater than 33,000 GVWR (i.e. heavy-heavy duty diesel trucks for the purposes of emission estimation)
- d. The round trip length and the name and location of the assumed disposal site.
- e. Please identify if any special trucking mitigation would be employed, or if low-bid available local contractors will be used for wastewater trucking.

Response:

- a. The main water supply for the Midway Project has been identified as the Irrigation Return Flow – Agricultural Backwash Pond. Wastewater generated from the reverse osmosis (RO) unit utilizing the irrigation return flow – agricultural backwash pond as water supply will be discharged to the on-site unlined evaporation/percolation pond. In the rare instance that the plant were to operate for a high number of hours (more than 400) and the RO pond created a water system limitation, the RO unit would be shut down and the demineralization units would run on raw water. This approach would eliminate a RO wastewater flow; therefore, there will be no wastewater generated.

For whatever reason, should upper aquifer groundwater be needed as water supply for the Midway Project, the RO unit would be shut down and raw groundwater would be sent directly to the demineralization units. This approach would eliminate a RO wastewater flow and there will be no wastewater generated.

- b. While no wastewater truck trips would be required, new demineralization units would need to be delivered approximately once a week (worst-case estimate). As identified in the Project AFC, one demineralized water treatment service trip was included as a worst-case project operating conditions scenario (see page 5.11-10). Therefore, no increase in truck trips would occur over what was analyzed in the Project AFC.
- c. Given the responses provided above, this question is not applicable.
- d. Given the responses provided above, this question is not applicable.
- e. Given the responses provided above, this question is not applicable.

**Starwood Power-Midway, LLC Peaking Project
Amendment 1
Air Quality Data Requests Responses
06-AFC-10**

Technical Area: Air Quality

Data Request 2: Please identify the set of conditions, when using the primary or the secondary water supply, that could cause the wastewater to be prohibited from being discharged into the RO pond.

Response: Primary Water Supply:

As stated on page 3.4-2 of the Starwood Power-Midway Amendment document, the on-site unlined evaporation/percolation pond would be 29,600 square-feet in size. The evaporation pond is designed to accommodate over 4.3 acre-feet of wastewater discharge per year.

In the rare instance that the plant were to operate for a high number of hours (more than 400) and the RO pond created a water system limitation, the RO unit would be shut down and the demineralization units would run on raw water. This approach would eliminate a RO wastewater flow.

Secondary Water Supply

Upon such time that use of the secondary water supply is needed, the RO unit would be shut down and raw groundwater would be sent directly to the demineralization units, and no wastewater would be generated.

If use of secondary water supply is required, and discharge to the on-site pond is considered at some future date, the Project would re-submit a revised Report of Waste Discharge to the Central Valley Regional Water Quality Control Board (RWQCB), upon which time revised waste discharge requirements would be issued. Although this operating profile is not being considered or anticipated the Project will comply with all RWQCB discharge requirements should there be a reason to reconsider the stated operating plan.