

**APPENDIX H-2**  
**TECHNICAL MEMORANDUM TO ADDRESS RECs IDENTIFIED IN**  
**PHASE 1 ESA**

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**Administrative Draft**

# Technical Memorandum

**Date:** July 23, 2018

**To:** Aarty Joshi, Senior Manager, Environmental Permitting  
James Kelly, Development  
NRG Renewables

**From:** Carl Lenker, Senior Project Engineer, Tetra Tech, Inc.

**Re:** Recommended Measures to Address RECs Identified in the Phase I ESA for the Daggett Solar Power Facility Project, San Bernardino County, California

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## INTRODUCTION AND BACKGROUND

Tetra Tech, Inc. (Tetra Tech) performed a Phase I Environmental Site Assessment (ESA) for the proposed Daggett Solar Power Facility (Project) for NRG Energy, Inc. (NRG) encompassing approximately 3,393 acres of land in San Bernardino County, California (Property; Attachment 1). The objective of this Phase I ESA was to identify Recognized Environmental Conditions (RECs), Historical RECs (HRECs), and Controlled RECs (CRECs) that affect the Property. The objective of this technical memorandum is to provide recommended measures to address the RECs identified in the Phase I ESA for purposes of evaluating the Project under the California Environmental Quality Act (CEQA).

The Phase I ESA identified no HRECs or CRECs; however, the following two RECs were identified:

- **Sunray Solar Energy Project:** The solar facility (formerly the Solar Energy Generating Station II), located at 35100 Santa Fe Street in the City of Daggett and immediately adjacent to the Property, had numerous documented spills and leaks of heat transfer fluid. Based on the information available, the numerous documented spills and leaks are considered a REC based on reported impacts to water for a few of these spills, proximity to the Property, groundwater flow direction toward the east/southeast, and lack of closure documentation.
- **Barstow-Daggett Airport:** The Barstow-Daggett Airport is located immediately adjacent to the south of the Property. The airport includes five former underground storage tank (UST) sites that contain nine USTs. Potential and/or confirmed contaminants of concern previously identified from past soil sampling conducted for the UST sites include petroleum contaminants including benzene, toluene, ethylbenzene, lead, and xylenes. In addition, gasoline is identified as a potential contaminant of concern for groundwater. Two waste disposal sites are also located at the airport. Soil contaminants associated with the waste disposal sites include methylene chloride and the following metals: arsenic, barium, beryllium, chromium, cobalt, copper, lead, molybdenum, nickel, selenium, thallium, vanadium, and zinc. Based on the information available, the soil and/or groundwater impacts at this property associated with the leaking USTs and waste disposal activities are considered a REC as contamination from these areas of the airport represents a material threat to the Property based on the proximity to the Property, the history of contamination, groundwater flow direction toward the east/southeast, and lack of closure documentation.

## **RECOMMENDATIONS**

Based on the RECs identified, there is a potential for impacted soils and groundwater to be present at the Property. Depths to groundwater in the vicinity of the Property range from 100 to 200 feet below ground surface. Given the depth to groundwater and proposed Project, construction of the proposed Project is not expected to encounter groundwater. The following measures are recommended prior to construction to reduce potential constraints associated with the handling and disposal of soil that may exist at the Property:

- Perform a review of relevant environmental documents of the properties associated with the RECs to validate the REC conclusion and further evaluate potential contaminants and areas of concern in order to inform locations where shallow soil sampling may be required and any soil disposal requirements.
- Perform shallow soil sampling along the Property boundaries that are immediately adjacent to the Sunray Solar Energy Project and the Barstow-Daggett Airport based on the additional environmental document review and where grading is planned to occur to screen the soils for potential impacts.
- Prepare a Soil Management Plan to provide background information regarding the Property, highlight areas of concern that the grading contractor should be aware of during grading activities, and define the procedures for addressing suspected contaminated materials or subsurface anomalies that may be encountered during grading activities.

### **Attachments:**

1. Tetra Tech Phase I ESA Report

# **ATTACHMENT 1 TETRA TECH PHASE I ESA REPORT**

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*Phase I ESA included as Appendix H-1 of this EIR.*

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