

Southern California Edison
WODUP A.13-10-020

DATA REQUEST SET A.13-10-020 WODUP ED-SCE-02

To: ENERGY DIVISION
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Question BIO-03:

Biological Resources

BIO-3 Please provide details on the use of drilling fluids, including storage and disposal, and any measures that will be taken to avoid or mitigate impacts to habitat, wildlife, and jurisdictional wetland and water resources.

Response to Question BIO-03:

Drilling mud and drilling fluids are terms that describe the same thing; drilling mud is discussed in the PEA at the following location:

PEA Section 3.2.3.3 Foundation Installation states, "Slight to severe ground caving is anticipated along the preferred route during the drilling of the LST/TSP foundations due to the presence of loose soils or groundwater levels. The use of water, fluid stabilizers, drilling mud and/or casings would be made available to control ground caving and to stabilize the sidewalls from sloughing. If fluid stabilizers are utilized, mud slurry would be added in conjunction with the drilling. The concrete for the foundation would then be pumped to the bottom of the hole, displacing the mud slurry. Mud slurry brought to the surface is typically collected in a pit adjacent to the foundation and/or vacuumed directly into a truck to be reused or discarded at an off-site disposal facility in accordance with all applicable laws."

Additionally, SCE is providing the following additional detail to supplement the discussion referenced above in the PEA:

All drilling fluids would be handled, stored and disposed of in the manner as specified in their Material Safety Data Sheets and per all applicable laws and regulations. To minimize the need for drilling fluids, the structures have been relocated outside of jurisdictional wetland and water resources to the extent feasible.

Any overflow of groundwater, from the use of non-hazardous materials, such as drilling mud, could be pumped to a nearby area to infiltrate into the soil. The "discharge" area will have a gravel bag berm and/or soil surrounding to mitigate the flow of the water, and a Notice of Intent will be submitted to the SWRCB under the Statewide General Waste Discharge Requirements (WDRs) for Discharges to Land with a Low Threat to Water Quality (WQO Order No. 2003-0003-DWQ).