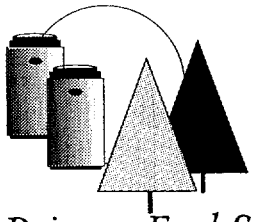

Private Fuel Storage, L.L.C.

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Phone 303-741-7009 Fax: 303-741-7806
John L. Donnell, P.E., Project Director

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

February 22, 2000

EIS COMMITMENT RESOLUTION LETTER #6
DOCKET NO. 72-22 / TAC NO. L22462
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.

References: 1. February 10, 2000 phone call between the NRC and S&W
2. February 11, 2000 phone call between the NRC and S&W
3. PFS Letter, Donnell to U.S. NRC, EIS Commitment Resolution Letter #5, dated February 15, 2000

During the above referenced phone calls, between the NRC and Stone and Webster (S&W), the NRC requested clarification/additional information regarding several topics discussed in the PFS Environmental Report (ER). The NRC requests/questions are documented below along with the PFS response. In Reference 3 PFS stated that additional information would be provided regarding site selection, best management practices, and permitting requirements/status for aggregate sources. This additional information is included in items 1 through 3 below.

NRC Requests/Questions

1. PFS needs to provide further clarification in Chapter 8 of the ER regarding the site selection process. The selection criteria used for each phase needs to be clearly identified as well as the number of sites eliminated during each phase of the process. PFS also needs to provide additional information to explain how the additional 12 potential host sites (those in addition to the original list of 26 applicants to the Nuclear Waste Negotiator's office) were determined.

RESPONSE – The question concerning the additional 12 potential host sites was explained in the response provided in Reference 3. Chapter 8 of the ER will be updated as indicated in Attachment 1 to provide additional clarification to the site selection process.

2. The phrase "best management practices" is used in ER Chapter 9 in the discussion on Surface Water Protection and Preservation of Air Quality. PFS needs to explain this term and identify what best management practices PFS will implement.

RESPONSE – The explanation of what is meant by the phrase Best Management Practices (BMPs) was included in the response provided in Reference 3. The Reference 3 response is repeated below along with additional information on the best management practices that PFS will implement.

Best Management is defined in both federal and state regulations. EPA's definition is found in 40 CFR Part 122.2 and reads as follows:

> Best Management Practices (BMPs) means schedules of activities, prohibition of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of "waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

The definition is also used as defined above by the State of Utah in the Department of Environmental Quality's (DEQ) Stormwater General Permit for Construction Activity, Part VII, Definitions. An example of BMPs is shown in a list of BMPs for Salt Lake County, Department of Public Works, Guidance Document for Storm Water Management During Construction Activities, May 1995, Appendix A.

Some of the best management practices that PFS will implement at each construction location are shown in the Table included as Attachment 2. As detailed design of the facility progresses additional BMPs will be selected and applied as appropriate.

The ER will be updated to include the above information.

3. PFS should provide a map that shows the location of the aggregate sites in Skull Valley presented in ER Table 4.1-7. Additional information should be provided as to the operational status of each site and the permitting requirements/status of each site.

RESPONSE - A map showing the location of the nearby privately owned aggregate sites as listed in ER Table 4.1-7 was included with the response provided in Reference 3. The permitting requirements/status of each site is discussed below.

Under Utah's Mined Land Reclamation Act, "sand, gravel, and rock aggregate deposits" are excluded from the requirement to obtain a DOGM permit. See Utah Code Ann. §§ 40-8-4 (3)(b) and 8(b) and 40-8-13 (permitting requirements apply to "Mining Operations," and Mining Operations and Deposits defined to exclude "sand, gravel, [and] rock aggregate").

DOGM has promulgated a rule at R647-1-106, Utah Administrative Code, which defines "rock aggregate" to mean:

> those consolidated rock materials associated with a sand deposit, a gravel deposit, or a sand and gravel deposit, that were created by alluvial sedimentary processes. The definition of rock aggregate specifically excludes any solid rock in the form of bedrock which is exposed at the surface of the earth or overlain by unconsolidated material.

Thus, under DOGM's definitions, the statutory exception for rock aggregate is limited to material that was created by alluvial sedimentary processes and does not extend to solid rock. Under this interpretation, a DOGM permit is required for aggregate deposits that are composed of solid rock.

Non-Ballast Sites

Based on the above definition it is clear that true sand and gravel deposits that were deposited through alluvial or sedimentary action are not subject to DOGM regulation or permitting requirements. The three private sources identified in the ER as potential sources for the material needed for the PFS project, other than the ballast material, are clearly alluvial. Those sites are the Stansbury West Pit, the Hickman Knolls Pit and the Willow Creek Pit. One of the sites, Willow Creek, is currently active and the other two sites have been operated in the past. Accordingly, the material is visible, and from inspections of each of the sites, it can be concluded that material from each of the sites was formed through alluvial action. Thus, no DOGM permit is required for these sites.

Ballast Sites

Two private quarries have been identified as potential sources for the ballast material needed for the PFS project -- the Corral Canyon and Marblehead Quarries. Each of these sites contains material that is likely not rock aggregate under DOGM's definition. The material is solid rock that must be blasted in order to remove it.

A review of DOGM records identified a mine permit for the Marblehead site, held by Chemical Lime Company. The mine was last operated in 1990. The permit is in an inactive status.

DOGM's records revealed no permit for a mine by the name of Corral Canyon. Corral Canyon appears to be an old quarry that has not been operated for years.

In addition to the DOGM permitting discussed above, all sand and gravel or quarry operations would be subject to the same NPDES, air, groundwater, and safety regulations that apply to any other activity. For example, if a pit has a process wastewater stream for gravel washing that results in wastewater discharge to a stream, then the facility would be required to have a NPDES permit.

4. Chapter 4 of the ER, Section 4.1.5.2 states: "The construction of the PFSF site only generates material during stripping operations. The 86,000 cubic yards of material produced will be used to construct the PMF berm and used as slope dressing on the access roads and perimeter roads. Again, this will help stabilize the slopes by promoting the growth of vegetation and increase the stability of the slopes by flattening them." It appears that construction of the berms will not require this much material. PFS should clarify what will be done with the extra material from the stripping operations. PFS should also include a discussion of what will be done with the soil cement that is excavated in order to construct the cask storage pads.

RESPONSE -

Construction of the PMF berms (with elevation and side slopes as currently shown on PFSF drawings) will require approximately 55,000 cubic yards of material. The excess 31,000 cubic yards of material (86,000 CY – 55,000 CY) from the stripping operations will be used to increase the width of the PMF berms and to flatten the slopes of the PMF berms, access roads and perimeter roads. As stated in ER Section 4.1.5.2, no material will be disposed of off site. The type and quantity of required imported materials necessary for construction of the rail line, ITP, and the PFSF site are provided in Table 4.1-6.

The soil cement will be constructed and placed in the cask storage area by quadrants. The SE quadrant will be placed during Phase 1, the SW quadrant during Phase 2, and the northern half of the cask storage area during Phase 3. Two possible scenarios for construction and placement of soil cement are discussed below:

- Excavate all the eolian silt in the quadrant and stockpile locally. Mix the eolian silt with cement and water and place over the cask storage pad area in approximate 6-inch lifts until the entire area is covered to the required depth. Excavate the soil cement as required for placement of the concrete for the cask storage pads or;
- Excavate all the eolian silt in the quadrant and stockpile locally. Mix the eolian silt with cement and water and place over the cask storage pad area in approximate 6-inch lifts until the entire area is covered to a minimum depth of 1-ft. Construct the cask storage pads on top of the soil cement. Mix and place soil cement in approximate 6-inch lifts between the cask storage pads.

This avoids excavation of the soil cement (required in the first scenario) to place the concrete for the cask storage pads but may result is excess eolian silt.

If the first scenario is chosen, soil cement that is excavated in order to construct the cask storage pads during Phase 1 of construction will be used where possible as common fill and therefore reduce the quantity of imported common fill shown for Phase 1 in Table 4.1-6. Soil cement that is excavated in order to construct the cask storage pads during Phase 2 of construction will be temporarily stock piled and used as common fill during Phase 3 of construction and therefore reduce the quantity of imported common fill shown for Phase 3 in Table 4.1-6. Soil cement that is excavated in order to construct the cask storage pads during Phase 3 of construction will be used to increase the width and flatten the slopes of the PMF berms.

The final method selected for construction and placement of the soil cement will be developed after completion of final design and development of a detailed construction plan. Regardless of the method chosen for placement of the soil cement, excess material (soil cement or eolian silt) will be used on site. No material will be disposed of off site.

5. PFS should provide a map that shows the location where the photographs included in ER Chapter 4, Appendix 4A were taken. Each location on the map should include an arrow that shows the direction of the view presented.

RESPONSE – Figures 19, 20, and 21 are included as Attachment 3. These Figures show the location where the photographs included in ER Chapter 4, Appendix 4A were taken and include an arrow that shows the direction of the view presented.

6. PFS should provide a discussion on the availability and source of construction materials (sand, gravel, structural and common fill) for the Wyoming site.

RESPONSE – PFS does not currently have this type of information for the Wyoming site. PFS will attempt to obtain the requested information from the appropriate agencies or other information sources. The information will be forwarded to the NRC after receipt.

7. Does PFS intend to use any of the local roads or jeep trails that cross Skull Valley for construction equipment access to the Low Corridor rail line during construction?

RESPONSE – No. Construction equipment will access the Low Corridor from either the North end of the rail line near the siding or from the South end where the rail line enters the Reservation.

If you have any questions regarding this response, please contact me at 303-741-7009.

Sincerely

John L. Donnell
Project Director
Private Fuel Storage L.L.C.

Enclosure

Copy to (with enclosure):
Mark Delligatti
Scott Flanders (8 copies)
John Parkyn
Jay Silberg
Sherwin Turk
Greg Zimmerman
Scott Northard
Denise Chancellor
Richard E. Condit
John Paul Kennedy
Joro Walker

ATTACHMENT 1

SITING ALTERNATIVES

8.1.3 Siting Alternatives

8.1.3.1 Selection of Candidate Sites

PFS selected a proposed location on a selected site through the application of a four-phase site selection process. PFS started with 38 potential candidate sites, which were ultimately reduced to one selected host site. The 38 sites included the 26 sites that had applied to the Nuclear Waste Negotiator to host an MRS, as well as 12 additional self-nominated sites that had contacted PFS and requested consideration to host the ISFSI. The process of evaluating the 38 candidate sites was divided into four phases:

1. Candidate Area Screening;
2. Area/Site Overview Screening;
3. Candidate Area Selection;
4. Final Candidate Site Selection.

The objective of the Phase One, Candidate Area Screening, was to do an initial screening of all potential sites that had been brought to the attention of the PFSLLC Board of Managers in order to screen out candidate sites that were burdened by obvious disqualifying factors. PFS developed the following criteria to perform the screening in Phase One:

- Willing Host Jurisdiction – The jurisdiction should be willing to host an ISFSI;
- Public Acceptance – Local community attitudes should appear to be open to the siting of an ISFSI.
- Favorable Proximity to Transportation Access – The proposed site should be within reasonable proximity of transportation infrastructure.
- No Jurisdictional Restrictions – The jurisdiction of the proposed site must have no statutes or other legal restrictions that would prohibit siting of an ISFSI. This criteria was used as an exclusion factor.

Many of the original 38 sites were screened out using the Phase One criteria. A subcommittee of the PFS Board of Managers conducted the screening evaluation on the 38 potential sites and identified those sites clearly burdened with disqualifying factors. Eight (8) of the 38 potential sites, each of which had originally submitted grant requests under the DOE Nuclear Waste Negotiator MRS Process, were screened out because they subsequently declined or did not actively pursue DOE MRS funding. PFS determined that these eight sites did not appear to be willing host jurisdictions based on their declining to participate in the DOE process. Two (2) more of the 38 sites were similarly screened out for appearing not to be a willing host jurisdiction. These two additional sites had been awarded DOE funding but had taken subsequent actions indicating their lack of willingness to host a spent fuel storage facility. Seven (7) more of the 38 sites, each of which had been on the DOE list, were screened out because they had been denied DOE funding for further study and evaluation as a potential MRS site based on DOE's

determination that further evaluation of these sites was not warranted. Accordingly, PFS did not believe that further evaluation of these seven sites merited more detailed evaluation. Finally, the two (2) Mescalero sites were eliminated based on PFS's past lack of success in reaching agreement with the Mescalero Apache Tribe on the siting of a spent fuel storage facility.

Phase Two, Area/Site Overview Screening, performed a further screening of the potential sites using regulatory criteria for siting and licensing an away-from-reactor ISFSI and implementation criteria. This process included NRC rules and federal regulations for siting an ISFSI (10 CFR 72, Subpart E and 10 CFR 100, Appendix A); and criteria developed specifically for this project to reflect cost, geologic, seismic, demographic, hydrologic and environmental factors. PFS used the following criteria to perform the evaluation in Phase Two:

- Site Availability – The proposed site should have one or more areas of suitable size available for acquisition.
- Site Development Cost – The proposed site should have one or more areas that could be developed at reasonable cost.
- Flood Plains – The proposed site should have areas of suitable size located outside of flood plains (10 CFR 72.122(b)(2)). This criteria was used as an exclusion factor.
- Geology – The proposed site should have stable geologic conditions (10 CFR 72.102(e)). This criteria was used as an exclusion factor.
- Seismology – The proposed site should not be within the range of strong near-field ground motion from historical earthquakes on large known capable faults (10 CFR 72.102(e)). This criteria was used as an exclusion factor.
- Demography – The proposed site should be in an area of low population density. This criteria was used as an exclusion factor.
- Environmental Conditions – The proposed site should have areas of suitable size that would not significantly impact threatened or endangered species, wetlands, historical or archeological resources or major recreational areas. This criteria was used as an exclusion factor.

Additional sites were screened out using the Phase Two criteria. The Phase One and Two screening processes culminated in a Board of Managers meeting on May 22, 1996. In this meeting, the PFS Board of Managers considered the candidate sites, including, for completeness, final consideration of those sites that had been previously screened out as described above. Based on available information, the most promising sites were identified and evaluated by the Board of Managers, as discussed in the following paragraphs. As a result of this meeting, four (4) sites were selected by the Board of Managers for additional evaluation in Phase Three, Candidate Area Selection.

A list of questions summarizing the Phase One and Phase Two criteria was developed for the May 22, 1996 meeting to facilitate the Board of Manager's evaluation and selection process (Table 8.1-1A). A tabulation of answers to these questions was prepared for each of the 38 potential sites, including those that had been preliminarily screened out by the subcommittee of the Board of Managers, to the extent available (Appendix 8A). In

addition, PFS member utilities undertook additional research to obtain relevant information concerning sites for which the owners or promoters had expressed an interest in hosting a spent fuel storage facility. Written evaluations were prepared for 11 of the candidate sites for which the most detailed information was available, providing background information and the advantages and disadvantages of each, for use at the May 22, 1996 Board of Managers meeting (Appendix 8B).

The above information was presented, discussed and evaluated at the May 22, 1996 Board of Managers meeting. Discussion initially focused on eight of the candidate sites that were the furthest along in the evaluation process by virtue of both having expressed interest and information provided by the potential hosts. The discussion covered background information as well as various advantages and disadvantages of each. Other potential sites were also discussed but were generally not deemed to provide any greater potential of a satisfactory site than those already discussed. The Board of Managers concluded that sufficient information had been developed and presented to choose several sites for in-depth study and evaluation. A vote was taken by the Board of Managers and four sites were chosen for further evaluation in Phase Three of the site selection process, Candidate Area Selection.

Phase Three, Candidate Area Selection, focused on the four (4) remaining sites selected by the Board of Managers on May 22, 1996 for further evaluation at the conclusion of Phase One and Phase Two. Subsequent to the May 22, 1996 Board of Manager's meeting, however, the host jurisdiction for one of the four sites (Caliente, Nevada) decided not to participate in Phase Three, thus reducing to three (3) the number of sites evaluated in Phase Three. The objective of Phase Three was to identify at least two candidate site areas that would likely meet NRC licensing regulations, and would not be unreasonably expensive to develop. At least two candidate site areas were desired in order to have an alternate choice should problems with the primary site develop further into the process. The evaluation process used in Phase Three utilized two primary methods. First, a list of detailed questions (Table 8.1-2) reflecting site suitability criteria was developed to be answered by the owners / promoters of the three remaining candidate sites. Second, a major engineering firm familiar with nuclear construction issues, Stone & Webster, was engaged to conduct a field evaluation visit to each of the three candidate sites.

Responses were received from the owners / promoters of the three remaining sites by mid-June 1996 and were discussed by the Board of Managers at their June 18, 1996 meeting (Appendix 8C). The Board of Managers requested Stone & Webster to perform an independent evaluation of the strengths and weaknesses of the three sites based on both the response provided by the owners / promoters and independent field investigations, judged against the selection criteria developed for Phase Three. Stone & Webster prepared an evaluation matrix for the three siting areas based on the responses received and conducted a field investigation of the three sites. This evaluation concluded that one of the three sites was not suitable for development of an ISFSI because the site did not appear to offer sufficient contiguous land area to reasonably site an ISFSI of the anticipated size needed for the project. This potential lack of suitability was confirmed

by a field walkdown of the area at the site. Accordingly, this site was eliminated from further consideration in the site selection process, and the remaining list of candidate sites was reduced to two.

Stone & Webster sent a technical review team to conduct a field investigation of the two remaining candidate siting areas to evaluate the technical and licensing viability of each. Three major categories of criteria were used for the field investigations – environmental, technical, and permitting requirements.
The environmental criteria included:

- land use;
- demographics;
- cultural factors;
- ecological factors;
- hydrology;
- hazards;
- meteorological factors;
- visual impact; and
- auditory impact.

The technical criteria included:

- geologic factors;
- topography;
- drainage;
- siting;
- flexibility;
- cost; and
- accessibility.

The permitting requirements criteria included:

- permits required for wetlands;
- permits required for dredge/fill operations;
- permits required for the Endangered Species Act; and
- permits required for building.

The results of the field investigation evaluating the two remaining sites against these criteria were documented in the "Field Investigation Evaluation Report" issued by Stone & Webster in final form on August 7, 1996. This technical investigation and evaluation concluded that the two remaining sites were ranked very closely based on the overall technical evaluation criteria and that both were suitable for the development of an ISFSI. Accordingly, Stone & Webster recommended that both candidate areas remain under active consideration by PFS as potential sites for the project.

Phase Three concluded with negotiations with the owners / promoters of the two remaining sites, followed by selection of a single candidate site. Based on Stone &

Webster's technical evaluations, the Board of Managers authorized negotiations with the owners of both of the remaining sites, as the final step in the Phase Three siting evaluation. As a result of this negotiation process, Skull Valley was selected by PFS as the site for the project based on requested fixed payments from the Wyoming site four times higher than for the Skull Valley site, substantially greater distance to population centers for the Utah site (no major towns within 10 miles of the Skull Valley site as compared with a distance of about one mile from the Wyoming site to the town of Shoshoni), the promoter of the Wyoming site having only an option to purchase the site, and a favorable vote by the Skull Valley Band's General Council to proceed with an interim spent fuel storage facility as compared with the uncertainties associated with the required legislative approval for the Wyoming site.

Phase Four, Final Candidate Site Selection, focused on selecting a specific location for the PFSF within the selected candidate site. The objective of Phase Four was to identify specific primary and alternative candidate siting areas within the Skull Valley Indian Reservation area proposed by the Skull Valley Band of Goshute Indians. This specific siting area selection process applied site-specific criteria including the host community's preferences, additional transportation infrastructure needs, additional cost factors, and additional environmental factors. Further field investigations of the alternative siting areas within the candidate site on the Skull Valley Reservation were performed by Stone & Webster and documented in a report, "Phase I – Preliminary Environmental Assessment Report," dated December 1996. Phase Four culminated in the selection and designation of a primary and an alternate ISFSI site for development on the Skull Valley Indian Reservation in northwestern Utah, as described in the sections below.

8.1.3.2 Designation of Siting Areas within the Candidate Site

The Skull Valley Band Executive Council determined the allowed candidate site search area on the reservation. The offered land on the Skull Valley Indian Reservation encompassed all of Sections 6 and 7 of T5S/R8W in Tooele County (Figure 8.1-1). Each of these two sections are approximately 600 acres in size, thus offering some flexibility in actual placement of the approximately 100 acre facility.

8.1.3.3 Potential Siting Areas Evaluated

Two potential locations, Site A and Site B, were identified by the PFSLLC on the Skull Valley Indian Reservation within the area proposed by the Skull Valley Band Executive Council. These sites are located in Sections 6 and 7 of T5S/R8W, Tooele County (Figure 8.1-2). The two potential sites were evaluated using the criteria in Table 8.1-3 and a final site was selected. Only minor differences in the two sites existed. Input was received from the Band in locating the access road from the final site to the Skull Valley Road. The other site is included as an alternative site.

ATTACHMENT 2

BEST MANAGEMENT PRACTICES

Description of Storm Water Pollution Prevention Controls and Best Management Practices that will be employed during the construction of the Private Fuel Storage Facility		
Construction Location	**Site Construction Activity**	**Minimum Controls/BMPs to be employed (1)**
PFS Site	Construction of the Probable Maximum Flood (100-year storm) diversion channels	Drainage ditches will be stabilized and lined with rock aggregate/rip rap to reduce flow velocity and prohibit scouring.
	Containment of sediment laden storm water runoff during the grading and construction work associated with storage pad construction	Infiltration basin - A large storm water infiltration basin will be constructed at the PFS site during the initial phase of construction. This basin will collect the vast majority of wet weather runoff from the construction site. The basin will be designed to capture the 100-year storm event and will be equipped with a stilling basin and an emergency overflow constructed of stabilized non-erodible material. Any solids collected within the runoff entering the basin will settle out and the water will either be evaporated off or will provide groundwater recharge.
	Dissipation of storm water runoff routed around the facility boundary	Flow dissipaters will be installed at the discharge point of each diversion channel to further reduce the storm water velocity and convert it to sheet flow. At a minimum, these devises will be constructed of Riprap.
	Stabilization of disturbed soils around the concrete fuel storage pads	Disturbed soils around the 30' x 64' concrete storage pads will be permanently stabilized with a layer of limestone aggregate.

(1) The BMPs identified herein are only a subset of the BMPs that will likely be employed during construction. As detailed design work progresses, the need for additional BMPs may be identified for specific construction activities. Where this occurs they will be added to this list.

Description of Storm Water Pollution Prevention Controls and Best Management Practices that will be employed during the construction of the Private Fuel Storage Facility		
Construction Location	**Site Construction Activity**	**Minimum Controls/BMPs to be employed (1)**
PFS Site (continued)	Stabilization of disturbed soils around the Canister Transfer Building, Security & Health Physics Building, Operations and Maintenance Building and Administration Building.	Silt fencing and sediment traps will be installed where appropriate. The construction roads will be periodically watered down to control fugitive dust emissions.
PFSF Access Road Construction	Construction of the Probable Maximum Food (100-year storm) diversion channels	As with the drainage ditches around the fuel storage facility, the probable maximum flood drainage ditch constructed perpendicular to the access road entering the site will be stabilized and lined with rock aggregate/rip rap to reduce flow velocity and prohibit scouring. If necessary, a storm water flow dissipation devise will also be placed at the diversion berm discharge point.
	Grading and construction of the access road	Silt fencing and sediment traps will be installed where appropriate. The construction road will be periodically watered down to control fugitive dust emissions. Stone construction pads will be placed at the entrance/exit point of access roads to avoid excessive tracking of dirt and sediment onto county or state highways. Where appropriate, external vehicle washing (without the use of detergents) will be performed on-site if it becomes necessary

(1) The BMPs identified herein are only a subset of the BMPs that will likely be employed during construction. As detailed design work progresses, the need for additional BMPs may be identified for specific construction activities. Where this occurs they will be added to this list.

Description of Storm Water Pollution Prevention Controls and Best Management Practices that will be employed during the construction of the Private Fuel Storage Facility		
Construction Location	**Site Construction Activity**	**Minimum Controls/BMPs to be employed (1)**
PFSF Access Road Construction (continued)	Fugitive dust controls from the access road construction	Fugitive dust emissions will be controlled through the implementation of a variety of BMPs. Construction road watering trucks will be used to periodically wet active construction road surface, stone construction entrance pads will be placed at constriction road egress points to avoid excessive sediment tracking onto roadways.
	Construction of drainage ways under the road	Box culverts will be placed at select locations under the access road entering the PFS site. Riprap or other flow dissipation devices will be placed at the discharge points of each culvert and silt fencing and/or sediment traps will be employed were appropriate.
Low Corridor	Grading and construction of the low corridor rail spur	Silt fencing and sediment traps will be installed where appropriate. Disturbed soils will be limited to the extent practicable to place the rail line. Soils immediately around the rail line will be stabilized with crushed aggregate.
	Stabilization of soil stockpiles associated with cut and fill activities.	Soil stockpiles generated during the construction of the low corridor will be placed in a manner to reduce erosion and down gradient areas will be protected by silt fencing. Temporary seeding or additional temporary soil stabilization measures will be applied if necessary.

(1) The BMPs identified herein are only a subset of the BMPs that will likely be employed during construction. As detailed design work progresses, the need for additional BMPs may be identified for specific construction activities. Where this occurs they will be added to this list.

Description of Storm Water Pollution Prevention Controls and Best Management Practices that will be employed during the construction of the Private Fuel Storage Facility		
Construction Location	**Site Construction Activity**	**Minimum Controls/BMPs to be employed (1)**
	Arroyo crossings	Culverts will be placed in drainage ways along the low corridor and they will be specified to convey runoff from a 100-year storm. In addition, the discharge points will be provided with stone aggregate or other flow dissipation devices to reduce storm water velocity and minimize erosion. Sideslope soil stabilization devices, including silt fencing and aggregate, will be used where appropriate.
Intermodal Transfer Point	Grading and construction of the ITP and access road	Silt fencing and sediment traps will be installed where appropriate. The construction road will be periodically watered down to control fugitive dust emissions.
Universal Housekeeping BMPs (applicable for all sites)		Construction equipment maintenance and repair will be designated and controlled to prevent the discharge of oils, grease, hydraulic fluids, etc.
		Waste receptacles and/or trash dumpsters will be placed at convenient locations for the regular collection of wastes. Where practicable, materials suitable for recycling will be collected.
		If external washing of construction vehicles is necessary, no detergents will be used and the runoff will be captured in a sediment trap.
		Adequately maintained sanitary facilities will be provided for all construction crews.

(1) The BMPs identified herein are only a subset of the BMPs that will likely be employed during construction. As detailed design work progresses, the need for additional BMPs may be identified for specific construction activities. Where this occurs they will be added to this list.

ATTACHMENT 3

PHOTO LOCATION MAPS

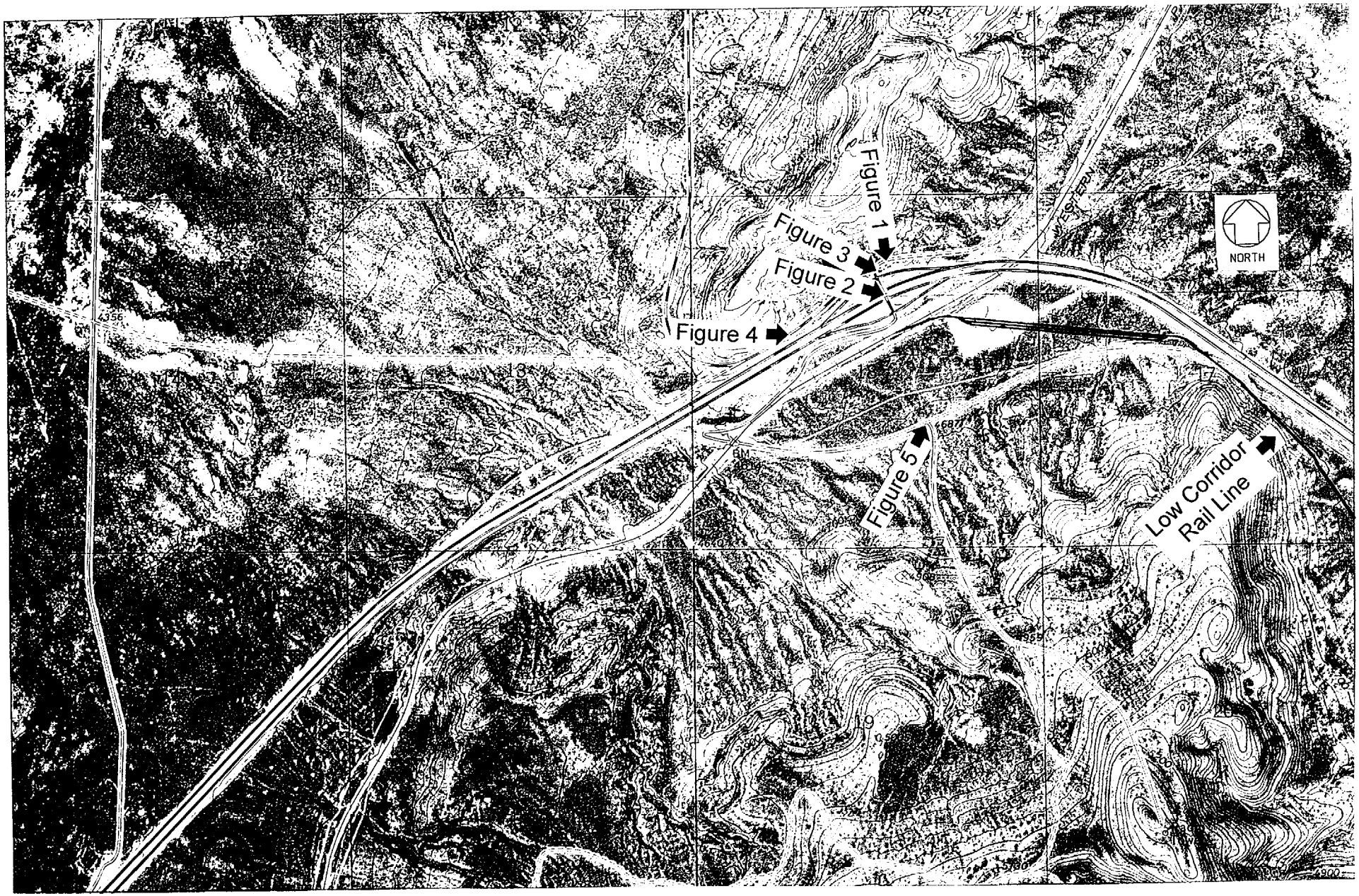

Figure 19
Photo Location Map - Rail Siding Area

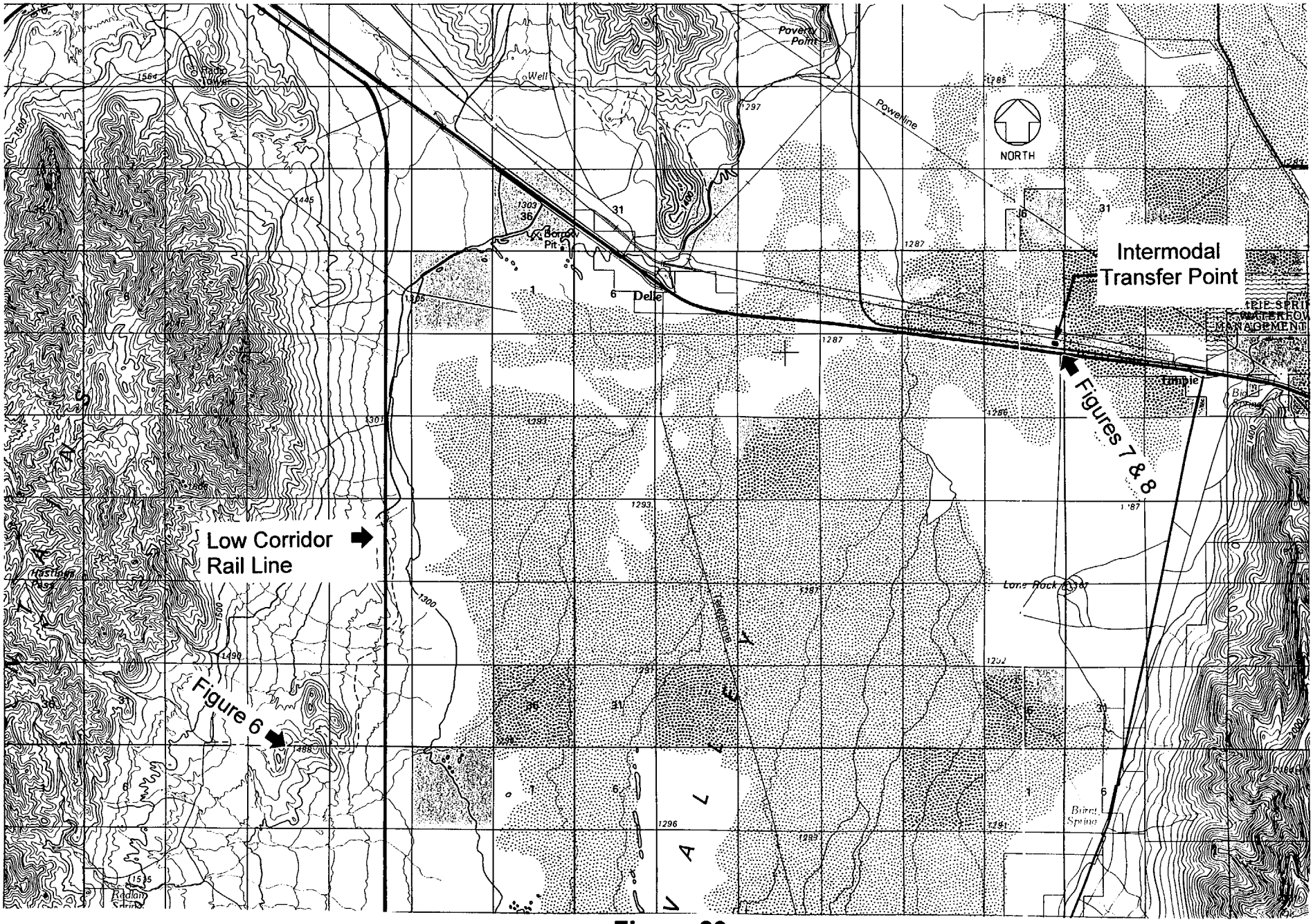

Figure 20
Photo Location Map - Upper Skull Valley

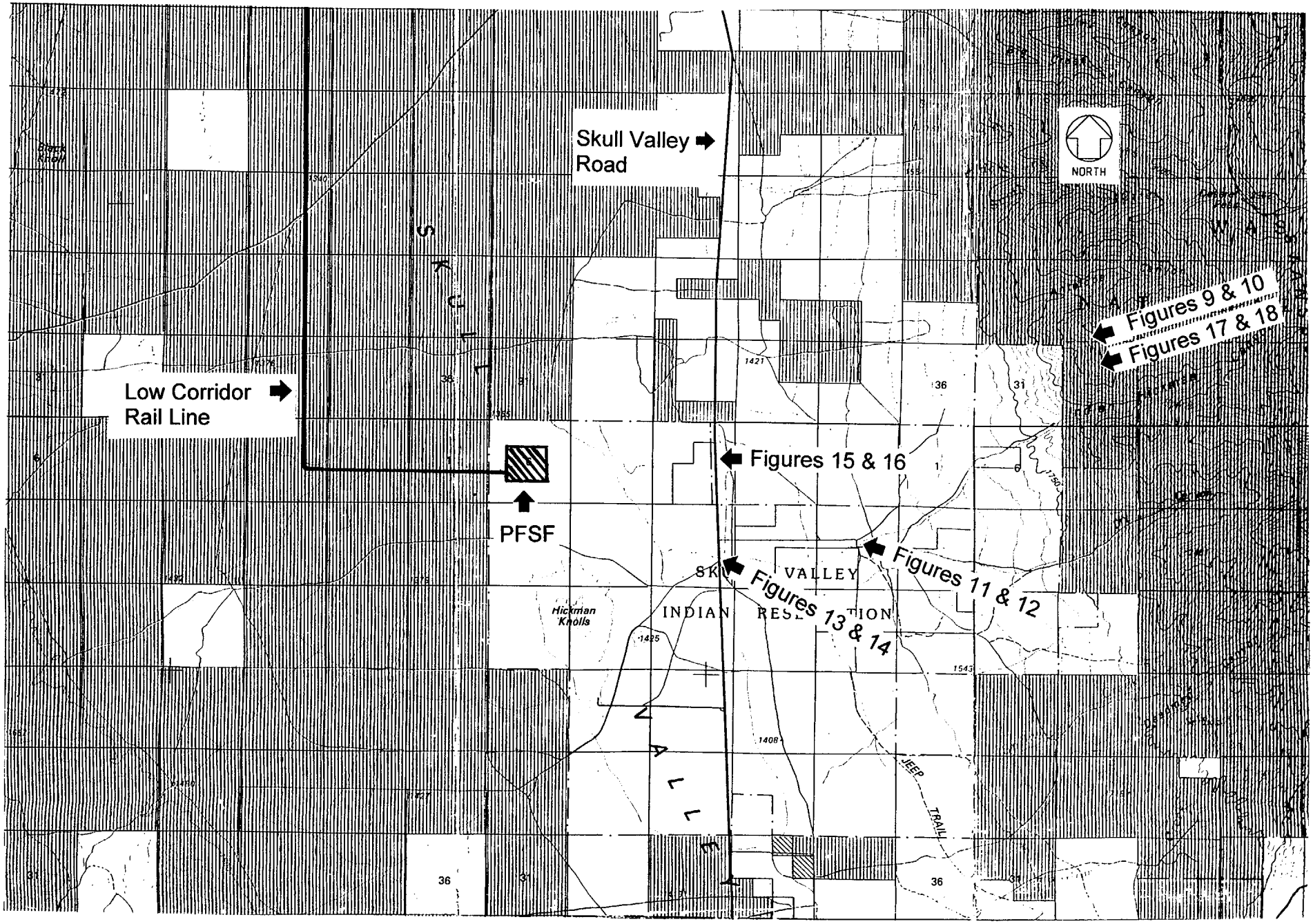

Figure 21
Photo Location Map – Lower Skull Valley