

## DOCKETED

<b>Docket Number:</b>	09-AFC-07C
<b>Project Title:</b>	Palen Solar Power Project - Compliance
<b>TN #:</b>	200046
<b>Document Title:</b>	Palen Solar Holdings, LLC's Response to Data Requests 78-81
<b>Description:</b>	N/A
<b>Filer:</b>	Marie Fleming
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<b>Submitter Role:</b>	Applicant's Representative
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<b>Docketed Date:</b>	7/26/2013


July 26, 2013

California Energy Commission  
Dockets Unit  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Subject: PALEN SOLAR HOLDINGS, LLC'S RESPONSE TO DATA REQUESTS  
78-81  
PALEN SOLAR ELECTRIC GENERATING SYSTEM  
DOCKET NO. (09-AFC-7C)**

Enclosed for filing with the California Energy Commission is the electronic version of **PALEN SOLAR HOLDINGS, LLC'S RESPONSE TO DATA REQUESTS 78-81**, for Palen Solar Electric Generating System (09-AFC-7C).

Sincerely,



Marie Fleming

## **PUBLIC HEALTH (78-81)**

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### ***BACKGROUND: HEALTH RISKS FROM MIRROR WASHING MACHINES, VEHICLE SYSTEMS OF MIRROR WASHING EQUIPMENT AND SITE SUPPORT VEHICLES***

*In applicant's health risk assessment (HRA) for facility operations, a total of 18 emitting units were modeled by the applicant for facility operations, including 2 auxiliary boilers, 2 night preservation boilers, 8 wet surface air condensers (WSAC) units, 3 emergency electric generator systems and 3 emergency fire pump systems. However, emissions of diesel particulate matter (DPM) from mirror washing activities and onsite operations support vehicles were not included in HRA, and these sources are listed with zero risk.*

**Data Request 78.** *Please revise HRA for facility operations by including DPM from mobile sources (i.e. vehicle systems of mirror washing equipment and site support vehicles).*

**Data Response 78.** The revised HRA provided to the CEC on July 18, 2013 incorporates the DPM emissions from the mirror washing and onsite activities.

**Data Request 79.** *Please verify that the water source of WSAC for the currently-proposed project is the same groundwater. If not, please describe the new source of water and how and when it was tested for TACs.*

**Data Response 79.** Based on data supplied by BSE, the water quality results used in the HRA for the WSACs is different from that supplied in the 2009 AFC documentation. The water analysis supplied for the amended project shows only two (2) potential air toxics, i.e., copper and beryllium.

**Data Request 80.** *If groundwater is the same water source for WSAC as the approved project, please provide groundwater concentrations and emission rates for metals and other chemicals present in groundwater from the WSAC and conduct a revised health risk assessment including all metals and other chemicals detected in the groundwater samples.*

**Data Response 80.** See response to Data Request 79.

**Data Request 81.** *Please verify that Chloroform is not included in the HRA and provide the reason.*

**Data Response 81.** Based on the available data, chloroform is not expected to be present in the WSAC circulation water due to the following: (1) chloroform is not present in the proposed water treatment chemicals, and (2) chloroform is not present in the current water analysis as supplied by the Applicant.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
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**PALEN SOLAR ELECTRIC  
GENERATING SYSTEM AMENDMENT**

**Docket No. 09-AFC-07C  
PROOF OF SERVICE  
(Revised 07/09/2013)**

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DECLARATION OF SERVICE

I, Marie Fleming, declare that on July 26, 2013, I served and filed copies of **PALEN SOLAR HOLDINGS, LLC'S RESPONSE TO DATA REQUESTS 78-81** dated July 26, 2013. The most recent Proof of Service List, which I copied from the web page for this project at: <http://www.energy.ca.gov>, is attached to this Declaration.

*(Check one)*

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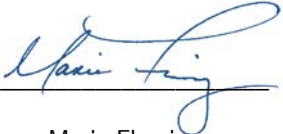
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: July 26, 2013

  
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Marie Fleming