

## DOCKETED

<b>Docket Number:</b>	09-AFC-08C
<b>Project Title:</b>	Genesis Solar Energy Project
<b>TN #:</b>	205840
<b>Document Title:</b>	Heat Transfer Fluid (HTF) infiltration incident, Genesis response
<b>Description:</b>	Genesis response letter to Energy Commission findings on HTF infiltration incident at Genesis
<b>Filer:</b>	Eric Veerkamp
<b>Organization:</b>	Nextera Energy/Genesis Solar, LLC
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	8/26/2015 9:47:37 AM
<b>Docketed Date:</b>	8/26/2015



July 1, 2015

Eric Veerkamp, Compliance Project Manager  
California Energy Commission  
1516 Ninth Street  
MS 2000  
Sacramento, CA 95814-5512

**Subject: Heat Transfer Fluid (HTF) Pond Infiltration Incident at Genesis Solar Energy Project (GSEP) 09-AFC-8C**

Dear Mr. Veerkamp,

In response to your letter dated June 23, 2015, the Genesis Solar staff has reviewed the recommendations and requirements and will implement the following measures to conform to the Commission's request.

**Biological Resources**

The plant Designated Biologist will submit quarterly reports to the CPM from February 2015 through February 2016 and will include the condition of the netting and all observed incidents of entangled or dead birds. For the first and second quarter of 2015, reports will be provided from the monthly site pond and net inspections.

**Hazardous Materials Management**

The Genesis Solar Emergency Action Plan (EAP) notification checklist has been updated to include the CUPA contact name and numbers.

**Soil and Water Resources**

- 1) Notification Checklist has been updated to ensure all agencies are notified.
- 2) Receipt of the revised MRP and discussions with the CRRWQCB occurred on June 2, 2015. "Detection Monitoring Reports for each monitored medium and all monitoring Points shall be monitored semiannually."
- 3) Procedures are being changed to prevent any HTF from entering into the evaporation ponds.
  - a. Genesis staff is evaluating measures to detect HTF volume in evaporative ponds.

### **Hazard Materials Management**

1. Procedures are being changed to prevent any HTF from entering into the OWS systems and the evaporative ponds.
2. Notwithstanding 1) above, to maintain the effectiveness of the HTF Oil Water Separator (OWS), the following will be implemented:
  - Diaphragm pumps are installed on both units to minimize emulsification of the water and oil.
  - The procedure for operation of the OWS includes temperature limits to ensure HTF is not routed to the evaporative ponds.
  - OWS will be maintained in a clean condition, Preventive Maintenance procedures are in place to ensure operation and cleanliness.
  - Pumps are maintained in manual mode to prevent HTF from entering the OWS.

### **Waste Management**

No action needed.

Please feel free to call me at 760-831-2651 for further details or if you have any questions.

Sincerely,

---

Luke Goguts  
General Plant Manager  
Genesis Solar, LLC