



SMUD
 Sacramento Municipal Utility District
Sacramento's First Choice for Energy

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 AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

November 25, 2008
 CPP08-027

| | |
|---------------|-------------|
| DOCKET | |
| 01-AFC-19C | |
| DATE | NOV 25 2008 |
| RECD. | DEC 05 2008 |

Ms. Angelique Juarez-Garcia
 Compliance Project Manager
 California Energy Commission
 1516 9th Street, MS-2000
 Sacramento, CA 95814-5512

**Subject: Cosumnes Power Plant (01-AFC-19)
 Condition of Certification HAZ-1; Requested Additions**

Dear Ms. Juarez-Garcia,

The Cosumnes Power Plant (CPP) Condition of Certification HAZ-1 states:

HAZ-1 The project owner shall not use any hazardous material not listed in Appendix B (AFC Table 8.12-3R), below, or in greater quantities than those identified by chemical name in Appendix B, below, unless reviewed in advance by the Sacramento County Environmental Management Department and approved by the CPM. This requirement does not apply to small quantities (less than a total of 25 gallons each) of paint, paint thinner, or cleaning solutions.

Verification: The project owner shall provide to the Compliance Project Manager (CPM), in the Annual Compliance Report, a list of hazardous materials contained at the facility.

CPP requests approval from the CPM to use water treatment chemicals shown in the attached table. The chemicals are presented in three additional AFC tabular formats to facilitate and expedite the review and comparison with the approved chemical list. The proposed chemicals have been submitted to the Sacramento County Environmental Management Department on County forms.

We look forward to the CEC's expressed approval of these products. Please contact me at (916) 732-7101 if you have any questions or require further information.

Sincerely,

Kevin Hudson, P.E.
 Senior Project Manager

Attachments

cc: Bob Nelson, SMUD
 Werneth Codoner, WGPO
 Dana Petrin, WGPO

**COSUMNES POWER PLANT, SACRAMENTO COUNTY
PROPOSED REPLACEMENT WATER TREATMENT PRODUCTS**

| Function | Current | Naico Replacement | HAZARDOUS INGREDIENTS: | Quantity on site | Location |
|---------------------|-----------------------------|--------------------------|--|---|---|
| Corrosion Inhibitor | FloGard MS6222 | | PHOSPHORIC ACID CAS# 7664-38-2 | 1000 gallons | Cooling Tower |
| | Spectrus NX 1100 | Naico 3DT185 | PHOSPHORIC ACID CAS# 7664-38-2 2-BROMO-2-NITROPROPANE-1,3-DIOL CAS# 52-51-7 MAGNESIUM NITRATE CAS# 10377-60-3 5-CHLORO-2-METHYL-4-ISOTHIAZOLIN-3-ONE CAS# 26172-55-4 MAGNESIUM CHLORIDE CAS# 7786-30-3 | 1000 gallons 800 gallons | Cooling Tower Cooling Tower |
| Biocide | | Naico 7330 Biocide | 5-CHLORO-2-METHYL-4-ISOTHIAZOLIN-3-ONE CAS# 26172-55-4 2-METHYL-4-ISOTHIAZOLIN-3-ONE CAS# 2682-20-4 MAGNESIUM NITRATE CAS# 10377-60-3 | 1000 gallons | Cooling Tower |
| | | Naico ControlBrom CB70 | SODIUM BROMIDE CAS# 7647-15-6 | 540 gallons | Cooling Tower |
| Dispersant | DeposiTrol BL5300 BL5303 | | PHOSPHONIC ACID CAS# 2809-21-4 | 1000 gallons | Cooling Tower |
| Anti Foam | Foamtrol AF2050 | Naico 3DT195 | NONE | 1000 gallons | Cooling Tower |
| Phosphate | Optisperse HP 3100 | Naico 7469 | OXIRANE/METHOXIRANE POLYMER WITH BUTYL ETHER CAS# 9038-95-3 POLYPROPYLENE GLYCOL CAS# 25322-69-4 SODIUM HYDROXIDE CAS# 1310-73-2 | 800 gallons 800 gallons 550 gallons | Water Treatment Building ZLD Water Treatment Building |
| Oxygen Scavenger | Control OS 5607 | Naico BT-3000 | SODIUM HYDROXIDE CAS# 1310-73-2 SODIUM TRIPOLYPHOSPHATE CAS# 7758-29-4 CARBONIC DIHYDRAZIDE CAS# 497-18-7 | 800 gallons | Water Treatment Building |
| RO Antiscalant | | Naico CNQR3475 | DIETHYL-HYDROXYL-AMINE CAS# 3710-84-7 HYDROQUINONE CAS# 123-31-9 | 550 gallons | Water Treatment Building |
| | | Naico Perma Treat PC 191 | NONE | 110 gallons | Water Treatment Building |

Table 8.12-2R

Location of Hazardous Materials (Proposed Additions)

| Trade Name | Use | Storage Location |
|-------------------------|--|------------------------------------|
| Nalco 3DT185 | Corrosion Inhibitor for cooling water system | Cooling Tower Chemical Feed System |
| Nalco 7330 Biocide | Biocide control for cooling tower | Cooling Tower Chemical Feed System |
| Nalco ControlBrom CB70 | Biocide control for cooling tower | Cooling Tower Chemical Feed System |
| Nalco 3DT195 | Dispersant | Cooling Tower Chemical Feed System |
| Nalco 7469 | Anti Foam | ZLD |
| Nalco BT-3000 | Phosphate (passivator) | Water Treatment Building |
| Nalco CNQR3475 | Oxygen Scavenger for boiler water | Water Treatment Building |
| Nalco PermaTreat PC 191 | RO Antiscalant | Water Treatment Building |

Table 8.12-3R
 CPP Chemical Inventory (Proposed Additions)

| Trade Name | Chemical Name | CAS Number (1) | Currently Onsite | Maximum Onsite Quantity | Hazardous Characteristics | CERCLA SARA RQ | La Follette Bill TPQ | Prop 65 |
|-------------------------|---|----------------|------------------|-------------------------|---------------------------|----------------|----------------------|---------|
| | | | Yes | 1000 gallons | Corrosive | 5000 lb | N/A | No |
| Nalco 3DT185 | PHOSPHORIC ACID (60-100%) | 7664-38-2 | Yes | 1000 gallons | Corrosive/Toxic | None | N/A | No |
| Nalco 7330 Biocide | 5-CHLORO-2-METHYL-4-ISOTHIAZOLIN-3-ONE (1-5%) | 26172-55-4 | Yes | 1000 gallons | Corrosive/Toxic | None | N/A | No |
| | 2-METHYL-4-ISOTHIAZOLIN-3-ONE (1-1%) | 2882-20-4 | No | 1000 gallons | Corrosive | None | N/A | No |
| | MAGNESIUM NITRATE (1-5%) | 10377-60-3 | Yes | 1000 gallons | Irritant | None | N/A | No |
| Nalco ControlBrom CB70 | SODIUM BROMIDE (10-30%) | 7647-15-6 | No | 540 gallons | Non-Hazardous | None | N/A | No |
| Nalco 3DT195 | Non-Hazardous | N/A | N/A | 1000 gallons | Non-Hazardous | None | N/A | No |
| Nalco 7469 | POLYPROPYLENE GLYCOL (10-30%) | 25322-69-4 | No | 800 gallons | Toxic | None | N/A | Yes |
| Nalco BT-3000 | SODIUM HYDROXIDE (1-5%) | 1310-73-2 | Yes | 800 gallons | Corrosive | 10,000 lb | N/A | No |
| | SODIUM TRIPOLYPHOSPHATE (1-5%) | 7758-29-4 | No | 800 gallons | Non-Hazardous | None | N/A | No |
| Nalco CNQR3475 | DIETHYL-HYDROXYL-AMINE (5-10%) | 3710-84-7 | No | 550 gallons | Irritant/Combustible | None | N/A | No |
| | HYDROQUINONE (1-5%) | 123-31-9 | No | 550 gallons | Irritant/Corrosive | 100 lb | 10,000 lb | No |
| Nalco PermaTreat PC 191 | Non-Hazardous | N/A | No | 110 gallons | Non-Hazardous | None | N/A | No |

(1) Ingredients exist on site in another chemical

Table 8.12-5R

Toxicity of Hazardous and Acutely Hazardous Materials (Proposed Additions)

| Trade Name | Physical Description | Health Hazard | Reactive & Incompatibles | Flammability |
|-------------------------|---|---|---------------------------------|---------------|
| Nalco 3DT185 | Light yellow liquid, acidic odor | Corrosive, severe skin/ tissue irritation or damage | Strong alkalis, reactive metals | Non-Flammable |
| Nalco 7330 Biocide | Light green to yellow liquid with mild odor | Corrosive, severe skin irritation or damage | Strong oxidizers | Non-Flammable |
| Nalco ControlBrom CB70 | Colorless/odorless liquid | Eye and skin irritation | Reducing agents, acid | Non-Flammable |
| Nalco 3DT195 | Clear orange liquid | None | Strong oxidizers | Non-Flammable |
| Nalco 7469 | Light yellow liquid | Skin and eye irritation | Strong oxidizers | Non-Flammable |
| Nalco BT-3000 | Light yellow liquid | Corrosive, severe skin/ tissue irritation or damage | Strong acids | Non-Flammable |
| Nalco CNQR3475 | Tan brown liquid, amine odor | Irritant to skin and respiratory tract | Strong oxidizers and acids | Combustible |
| Nalco PermaTreat PC 191 | Yellow liquid, ammoniacal odor | Irritant | Strong oxidizers and acids | Non-Flammable |