

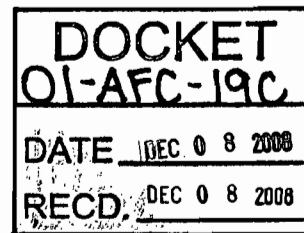
CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512



December 8, 2008

Kevin Hudson, P.E.
Senior Project Manager
SMUD
6201 S. Street
P.O. Box 15830
Sacramento, CA 95852-1830



**SUBJECT: COSUMNES POWER PLANT (01-AFC-19C)
RESPONSE TO THE CONDITION OF CERTIFICATION HAZ-1
REQUESTED ADDITONS LETTER**

Dear Mr. Hudson:

Thank you for your Condition of Certification HAZ-1 Request for Additions Letter dated November 25, 2008 with enclosed attachments. Per your request, the California Energy Commission staff has reviewed and approved the chemicals presented in the enclosed tables.

If you have any questions regarding this letter, I can be contacted by phone at (916) 654-4048 or e-mail at AJgarcia@energy.state.ca.us.

Sincerely,

Angelique Juarez-Garcia
Compliance Project Manager
Siting, Transmission & Environmental
Protection Division

Attachments

Cc: Dockets

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

Function	Current	Nalco Replacement	HAZARDOUS INGREDIENTS:	Quantity on site	Location
Corrosion Inhibitor	FloGard MS6222		PHOSPHORIC ACID CAS# 7664-38-2	1000 gallons	Cooling Tower
Biocide	Spectrus NX 1100	Nalco 3DT165	PHOSPHORIC ACID CAS# 7664-38-2	1000 gallons	Cooling Tower
			2-BROMO-2-NITROPROPANE-1,3-DIOL CAS# 52-51-7	800 gallons	Cooling Tower
			MAGNESIUM NITRATE CAS# 10377-60-3		
			5-CHLORO-2-METHYL-4-ISOTHIAZOLIN-3-ONE CAS# 26172-55-4 MAGNESIUM CHLORIDE CAS# 7786-30-3		
	Nalco 7330 Biocide	Nalco ControlBrom CB70	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
			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	Nalco 3DT195	NONE	~ 1000 gallons	Cooling Tower
Phosphate	Optisperse HP 3100	Nalco 7469	OXIRANE/METHOXIRANE POLYMER WITH BUTYL ETHER CAS# 9038-95-3	800 gallons	Water Treatment Building
			POLYPROPYLENE GLYCOL CAS# 25322-69-4	800 gallons	ZLD
			SODIUM HYDROXIDE CAS# 1310-73-2	550 gallons	Water Treatment Building
Oxygen Scavenger	Control OS 5607	Nalco BT-3000	SODIUM HYDROXIDE CAS# 1310-73-2	800 gallons	Water Treatment Building
			SODIUM TRIPHOSPHATE CAS# 7758-29-4		
			CARBONIC DIHYDRAZIDE CAS# 497-18-7	800 gallons	Water Treatment Building
RO Antiscalant	Nalco CNQR3475	Nalco Perma Treat PC 191	DIETHYL-HYDROXYL-AMINE CAS# 3710-84-7	550 gallons	Water Treatment Building
			HYDROQUINONE CAS# 123-31-9	110 gallons	Water Treatment Building
			NONE		

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
Nalco 3DT185	PHOSPHORIC ACID (60-100%)	7664-38-2	Yes	1000 gallons	Corrosive	5000 lb	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%)	2682-20-4	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 TRIPHOSPHATE (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 Accutely Hazardous Materials (Proposed Additions)

Trade Name	Physical Description	Health Hazard	Reactive & Incompatibles	Flammability
Nalco 3DT185	Light yellow liquid, acidic odor	Corrosive, severe skin/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/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