DOCKET
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January 4, 2010

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

Subject: **CAITHNESS BLYTHE II, LLC'S MODIFICATION TO THE AMENDMENT FOR THE BLYTHE ENERGY PROJECT PHASE II DOCKET NO. 02-AFC-1C**

Enclosed for filing with the California Energy Commission are one (1) original and one (1) copy of the **CAITHNESS BLYTHE II, LLC'S MODIFICATION TO THE AMENDMENT** for the Blythe Energy Project Phase II Docket No. 02-AFC-1C

Sincerely,

// original signed //

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STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of: Amendment for the Blythe Energy Project Phase II	**DOCKET NO. 02-AFC-1C** **CAITHNESS BLYTHE II, LLC'S MODIFICATION TO THE AMENDMENT FOR THE BLYTHE ENERGY PROJECT PHASE II**

Pursuant to section 1769(a) of the California Energy Commission Siting Regulations Caithness Blythe II, LLC (Caithness) hereby submits this Modification to the Amendment for the Blythe Energy Project Phase II (BEP II or Project).

Section 5.2.1 of the BEP II Amendment refers to the storage and use of anhydrous ammonia which is used in the Selective Catalytic Reduction (SCR) unit to control NO_x emissions. Section 5.2.1 should have referenced aqueous ammonia and not anhydrous. As permitted, the BEP II will use aqueous ammonia within the SCR. Additionally, the proposed turbines will not utilize inlet chillers which will also remove the need for anhydrous ammonia.

The BEP II Final Decision incorporated Conditions of Certification **HAZ-8**, **HAZ-10** and **HAZ-11** to reduce any potential risk associated with the use of anhydrous ammonia as

a refrigerant to less than significant levels.[1] Provided below, are the particular Conditions which were aimed at controlling, and/or monitoring the use of anhydrous ammonia. Since the Amendment proposes eliminating the use of anhydrous ammonia the Conditions identified below are no longer required. All other submittals pertaining to the Amendment reflect the elimination of anhydrous ammonia from the Project.

As stated in the submitted Amendment, the Commission found the BEP II would not have an adverse significant impact in the area of Hazardous Materials. Therefore, the removal of the permitted use of anhydrous ammonia from the BEP II should not modify or alter that conclusion. The project as proposed is expected to continue to comply with all applicable laws, ordinance, standards and regulations (LORS).

PROPOSED MODIFICATIONS TO CONDITIONS OF CERTIFICATION

5.6 HAZARDOUS MATERIALS

Pursuant to section 1769(a)(1)(A), the Amendment must address the need to modify existing Conditions of Certification to reflect the proposed modifications. The proposed changes to the Conditions of Certification are provided here.

HAZ-8 ~~The project owner shall develop and implement an Ammonia Refrigeration Hazard Reduction Plan. This plan shall include procedures, protective equipment requirements, training and a checklist, as described in the August 2001 EPA Chemical Safety Alert. It shall also include a section describing all measures to be implemented to prevent the leading of anhydrous ammonia from the refrigeration system. This plan shall also incorporate recommended practices as found in ANSI Standards 15-2001 and 34-2001 and the ASHRAE Position Document on Ammonia As A Refrigerant (January 17, 2002). The project owner shall include appropriate elements of the Cal-OSHA Process Safety Management standard (8 CCR section 5189).~~

[1] Blythe Energy Project Phase II Commission Decision, at 107

Verification: ~~At least sixty (60) days prior to the delivery of anhydrous ammonia to the facility, the project owner shall provide a safety management plan as described above to the CPM for review and approval.~~

HAZ-10 ~~The project owner shall install an approved automatic fire suppression system in the ammonia refrigeration plant~~.

Verification: ~~At least sixty (60) days prior to delivery of anhydrous ammonia to the facility, the project owner shall provide final design drawings and specification for the fire protection system approved by a registered Safety Engineer to the CPM for review and approval.~~

HAZ-11 ~~The project owner shall install an ammonia sensor on the discharge from the scrubber on the anhydrous ammonia refrigeration unit containment building that can be remotely read in the power plant control room and remotely read by a laptop computer operated by power plant personnel, the Blythe Fire Department and the Riverside County Fire Department. This sensor and all other sensors located inside the containment building shall be able to detect ammonia concentrations within a range of at least 10 to 20,000 ppm and shall be reported to the power control room on a real-time recordable basis.~~

~~Additionally, the project owner shall:~~

~~1. Perform a process safety evaluation of hazards associated with the chilling system and provide anhydrous ammonia release prevention features for the chilling system equipment and containment structure to enhance the safety of operators and emergency response personnel;~~

~~2. Require that any routine maintenance or repair work on the anhydrous ammonia refrigeration unit is conducted only during normal daytime work hours;~~

~~3. Require that maintenance or repair on any filter train be conducted only under lockout/tagout safety procedures;~~

~~4. Provide handheld ammonia vapor detectors and direct that they be used by workers whenever entering the ammonia refrigeration unit containment building; and;~~

~~5. Conduct joint training and exercises at least annually with the Blythe Fire Department, the Riverside County Fire Department, and site staff~~.

Verification: ~~At least sixty (60) days prior to delivery of anhydrous ammonia to the facility, the project owner shall provide the final design drawings and specification for the above systems, the results and recommendations of the process safety evaluation of hazards associated with the chilling system, and an agreement with the Blythe Fire Department, the Riverside County Fire Department, the Riverside County Hazardous Materials Response Team, and the Blythe Police Department to conduct joint training and exercises with the site personnel at least annually to the CPM for review and approval.~~

5.15 WORKER SAFETY

WORKER SAFETY-3 ~~Prior to the delivery of anhydrous ammonia to the project site, the project owner shall train personnel at the BEP II facility to the level of Hazmat Technician that is required to assist the City of Blythe or Riverside County Fire Departments in the response to an anhydrous ammonia incident. The training shall meet or exceed that described in NFPA 472, PSHA 29 CFR 1910.120, and EPA 40 CFR part 311.~~

Verification: ~~At least thirty (30) days prior to the delivery of hazardous materials to the site, the project owner shall provide the CPM with a letter indicating the number of employees that have been trained as Hazmat Technicians.~~

The Commission Decision found the BEP II would not have an adverse significant impact in the area of Worker Safety. Therefore, the removal of the permitted use of anhydrous ammonia from the BEP II should not modify or alter that conclusion. Moreover, implementation of the remaining 4 Conditions of Certification will ensure the

Project as proposed will not result in significant adverse impacts. The project as proposed is expected to continue to comply with all LORS.

Dated: January 4, 2009

// original signed //

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David L. Wiseman
Counsel to Caithness Blythe II, LLC