

CALIFORNIA ENERGY COMMISSION

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**DOCKET****08-AFC-3C**DATE MAR 22 2012RECD. MAR 22 2012

DATE: March 22, 2012
TO: Interested Parties
FROM: Christine Stora, Compliance Project Manager

**SUBJECT: Marsh Landing Generating Station Project (08-AFC-3C)
Staff Analysis of Proposed Modifications for Project Design
Refinements**

REVISION: To ensure that staff has enough time to respond to comments due by April 10, 2012, this petition to amend will be presented to the Energy Commission at the April 25, 2012 business meeting.

On February 3, 2012, GenOn Marsh Landing, LLC, filed a petition with the California Energy Commission to amend the Energy Commission Decision for the Marsh Landing Generating Station Project. Staff prepared an analysis of this proposed change and is recommending approval of the amendment petition. A copy is enclosed for your information and review.

The Marsh Landing Generating Station Project is a 760-megawatt project that was certified by the Energy Commission on August 25, 2010. The project is located north of the City of Antioch, in Contra Costa County and is currently under construction.

The modifications proposed in the petition would allow for the following changes to be made:

- Two 8 million British thermal units per hour (MMbtu/hr) natural gas fired pre-heaters will replace the two 5 MMBtu/hr pre-heaters that were approved;
- The water treatment at the plant will include a single-pass reverse osmosis system and will be moved into a new 7,922 square foot building. The total height of that building will be 18 feet;
- Increase the raw water storage tank from 300,000 gallons to 600,000 gallons;
- Remove the planned 300,000-gallon service water storage tank;
- Remove the planned 200,000-gallon secondary evaporative cooler blend water storage tank;
- Add a 170,000-gallon reverse osmosis permeate storage tank;
- Reduce the size of the planned wastewater storage tank from 500,000 gallons to 200,000 gallons;

- Total water storage on site will be reduced from 1.3 million gallons provided by 4 tanks, to 0.97 million gallons provided by three tanks;
- The sewer line along Wilbur Avenue is now proposed to be a 15-inch-diameter pipe, instead of a 6-inch-diameter pipe as approved in the decision;
- The construction warehouse is now proposed to be a permanent structure rather than temporary, as approved in the decision;
- The arrangements of the interconnection at the switch yard would be modified to accommodate changes being made by Pacific Gas and Electric (PG&E). Pole locations would change, but pole heights will remain the same. A switch yard building is also being proposed as well;
- The ammonia system is proposed to have single wall piping instead of double wall piping for the section of piping between the storage tank and the ammonia injection skids. A slightly modified above-ground containment area and underground sump are proposed. The drain will be slightly smaller at 38-inches in diameter. The truck unloading area will have a slightly modified above-ground containment area and the drain will be slightly larger at 30-inches in diameter;
- The main access road alignment has been moved slightly south to avoid the covered parking, and the covered parking is now proposed to remain on site; and
- The tempering air fans will no longer be inside a building and will have silencer housing on the inlet ducts. Each unit will have two 2,000-horsepower single speed fans. Both fans will be on the west side of each unit.

Energy Commission staff reviewed the petition and assessed the impacts of this proposal on environmental quality, public health and safety, and facility design and proposes revisions to existing conditions of certification for Air Quality **AQ-SC7** and Biological Resources **BIO-8**. The review process also included an evaluation of the consistency of the proposed changes to assure compliance with LORS and/or to reduce potential environmental impacts to a less than significant level. It is staff's opinion that, with the implementation the revised conditions, the project will remain in compliance with applicable laws, ordinances, regulations, and standards and that the proposed modifications will not result in a significant adverse direct or cumulative impact to the environment (Title 20, California Code of Regulations, Section 1769).

The amendment petition and staff's analysis has been posted on the Energy Commission's webpage at www.energy.ca.gov/sitingcases/marshlanding/compliance/index.html.

The Energy Commission's Order (if approved) will also be posted on the webpage. Energy Commission staff intends to recommend approval of the petition at the April 11, 2012, Business Meeting of the Energy Commission. If you have comments on this proposed modification, please submit them to me at the address below by April 10, 2012.

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Comments may be submitted by fax to (916) 654-3882, or by e-mail to cstora@energy.state.ca.us. If you have any questions, please contact me at (916) 654-4745.

For further information on how to participate in this proceeding, please contact the Energy Commission Public Adviser's Office, at (916) 654-4489, or toll free in California at (800) 822-6228, or by e-mail at publicadviser@energy.state.ca.us. News media inquiries should be directed to the Energy Commission Media Office at (916) 654-4989, or by e-mail at mediaoffice@energy.state.ca.us.

Enclosure