

DOCKETED

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| Docket Number: | 09-AFC-08C |
| Project Title: | Genesis Solar Energy Project |
| TN #: | 224993 |
| Document Title: | POST CERTIFICATION PETITION FOR AQUEOUS AMMONIA SYSTEMS DATA REQUEST SET 1 |
| Description: | DATA REQUEST |
| Filer: | Raquel Rodriguez |
| Organization: | California Energy Commission |
| Submitter Role: | Commission Staff |
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CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



October 15, 2018

Mr. Eric Preher, General Plant Mgr.
NextEra Energy Resources
11995 Wiley's Well Road
P.O. Box 2370
Blythe, CA 92226

**Subject: GENESIS SOLAR ENERGY PROJECT (09-AFC-08C) – POST
CERTIFICATION PETITION FOR AQUEOUS AMMONIA SYSTEMS -
DATA REQUEST, SET 1 (No. 1-10)**

Dear Mr. Preher,

California Energy Commission staff has reviewed the post certification petition for the Genesis Solar Energy Project (GSEP) and requires additional information to supplement the environmental analysis pursuant to Title 20, California Code of Regulations, Section 1769(a)(1)(E). The information requested is necessary to: 1) more fully understand the proposed project changes; 2) assess whether the modified facility would be constructed and operated in compliance with applicable laws, ordinances, regulations, and standards; 3) assess whether the proposed project changes would result in significant environmental impacts; 4) assess whether the facilities would be constructed and operated in a safe, efficient, and reliable manner; and 5) assess potential modifications to approved mitigation measures.

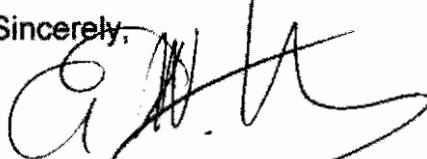
This data request (Set 1, No. 1-10) is being made in the areas of Air Quality, Cultural Resources, Traffic and Transportation, and Visual Resources. A written response to the enclosed data request is due to Energy Commission staff on or before October 29, 2018.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to me within 20 days of receipt of this request. The notification must contain the reasons for the inability to provide the information, the grounds for any objections, or the reason additional time is needed.

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If you have any questions regarding the enclosed data request, please call me at (916) 654-4295, or email me at eric.veerkamp@energy.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Veerkamp', written over a horizontal line.

Eric Veerkamp
Compliance Project Manager

Enclosure: Data Request

Technical Area: Air Quality

Author: Jacquelyn Record

BACKGROUND: AIR QUALITY PERMIT APPLICATION PROCESS

In reviewing the petition, it is unclear if this ammonia tank would trigger a new permit from the Mojave Desert Air Quality Management District (MDAQMD or "District"). Staff will need to review any new analysis and conditions that would be added to the permit for the aqueous ammonia storage tank. Staff will also need to coordinate with the project owner and District to keep apprised of any air quality issues determined by the District during their permit review.

DATA REQUEST

1. Please provide copies of any official submittals and correspondence to or from the District within 5 days of their submittal to or their receipt from the District.

BACKGROUND: ADDITIONAL DESCRIPTION OF AMMONIA TANK

The petition states, "the aqueous ammonia storage tank is a double walled, self-contained, above ground tank with a 3,150-gallon capacity.....The truck unloading station will include a fill connection bulkhead and truck containment." Staff would like a better understanding of the ammonia storage tank and its use.

DATA REQUESTS

2. Please explain if the ammonia storage tank will be vented, or have any additional emissions associated with its operation, including refilling of the tank.
3. Will any of the aqueous ammonia be directly sent to the boiler fire side (NOx control) or to the boiler water site (water chemistry control) or both, as shown in Figure 3 Process Flow Diagram on page 23 of the 53-page petition, and
4. Is there a Selective Catalytic Reduction system on the boiler?

Technical Area: Cultural Resources
Author: Gabriel Roark

BACKGROUND: Potential Cultural Resources

Staff has reviewed the project owner's petition and supporting documentation (Genesis Solar; Holt 2018). The petition proposes to upgrade and replace elements of the GSEP's aqueous ammonia system for both operating units. The petition describes the proposed upgrades but does not address the disposition of the existing aqueous ammonia system.

DATA REQUESTS

Staff requests the following information to complete their analysis.

5. Does Genesis Solar plan to demolish any elements of the existing aqueous ammonia system (including foundations and below-ground piping)? If so, please identify them on the petition's engineering drawings (Holt 2018) and describe the anticipated extent of ground disturbance involved in the demolition.

REFERENCES CITED

Genesis Solar 2018-Genesis Solar. Genesis Solar, LLC (9-AFC-8) *Petition to Amend*. August. TN 224664

Holt 2018-The Holt Group. Genesis Solar Energy Plant Ammonia System Improvement Project. July 20. Engineering drawings in *Genesis Solar, LLC (9-AFC-8) Petition to Amend*, by Genesis Solar. August. TN 224664

Technical Area: Traffic and Transportation
Author: Ashley Gutierrez

BACKGROUND: Construction Workers and Vehicle Trips

Petition Section 3.0, "Environmental Analysis", did not provide general traffic and transportation information. Staff's analysis of the project modification's potential environmental impact requires general information pertaining to the type of equipment required, number of construction workers and construction vehicle trips, and approximate duration of construction activities.

DATA REQUESTS

6. How many construction workers would be required to complete the project modifications at Unit 1 and Unit 2?

7. How many worker vehicle trips would construction and installation require?
8. Please describe the type of equipment required for construction and installation (e.g. crane, excavator).
9. Approximately how long would construction and installation of the project modifications take?

Technical Area: Visual Resources
Author: Ashley Gutierrez

BACKGROUND: Upgraded Tank and Awning Dimensions

Petition Section 3.0, "Environmental Analysis", did not provide general visual resource information. Staff's analysis of the project modification's potential environmental impact requires general information pertaining to the dimensions of new equipment proposed for installation.

DATA REQUEST

10. What are the dimensions of the new tanks and awning?