

DOCKETED

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October 18, 2018

Eric Veerkamp
Keith Winstead
Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Quicksilver (79-AFC-05C)
Socrates (79-AFC-03C)
Grant (82-AFC-01C): Supplemental Comments on the Staff Analysis of the Petition to Amend - Permanent Diesel Pump for Cooling Tower Wetting System and Staff's Revisions to Condition of Certification Worker Safety-1

Dear Mr. Veerkamp and Mr. Winstead:

On behalf of the GPC Quicksilver Power Plant (79-AFC-05C; "Quicksilver"), GPC Socrates Power Plant (79-AFC-03C; "Socrates"), and GPC Grant Power Plant (82-AFC-01C; "Grant") (collectively, the "Geysers Units"), Geysers Power Company, LLC ("Project Owner") hereby submits these supplemental comments on the Staff analysis¹ for the Geysers Units' *Consolidated Petition for Staff Approved Modifications*² and revisions to Condition of Certification Worker Safety-1 ("WS-1").³

In comments submitted on September 17, 2018, the Project Owner expressed concerns with newly proposed Air Quality conditions of certification (AQ-SC1 through AQ-SC3) and certain changes made to language contained in the local air districts' permits for the facilities. The Project Owner recommended clarifying language to proposed conditions AQ-SC1 through AQ-SC3 and objected to all of Staff's recommended conditions of certification that were intended to incorporate the provisions of the local air district permit. While the Project Owner still has concerns with these conditions, the Project Owner is prepared to accept all of Staff's proposed Air Quality conditions, including the changes proposed by Staff to the local air districts' permits, with the exception of the changes proposed in Attachment A, to move the *Consolidated Petition* forward for approval.

¹ The Staff analysis was filed separately in each of the three instant dockets as follows: Quicksilver (79-AFC-05C) – TN# 224576; Socrates (79-AFC-03C) – TN# 224577; Grant (82-AFC-01C) – TN#: 224578.

² TN# 222333 (79-AFC-05C), TN# 222334 (79-AFC-03C), TN#: 222335 (82-AFC-01C).

³ TN# 224986.

With respect to WS-1, the Project Owner believes that Staff and the Project Owner are in substantial agreement with respect to the purpose and intent of the proposed condition. As stated in our previously filed comments, the Project Owner is in the process of assessing the fire protection systems for the Geysers Units, and is not opposed to modification of the existing Commission-approved system as proposed in WS-1, if in fact the analysis determines that to be the best course of action. The Project Owner agrees in principle with Staff's revisions to WS-1, but proposes certain clarifying changes. A clean version of WS-1 that incorporates the Project Owner's proposed changes to Staff's revisions is provided in Attachment B.

The Project Owner proposes that the condition language be clarified in two respects. First, to ensure that the Project Owner has the flexibility to account for all potential outcomes of the review of the fire system, the Project Owner proposes deletion of the phrase "unless the project owner installs a code compliant integrated wet down/fire protection system" approved by the Compliance Project Manager ("CPM"). The Project Owner is concerned that the term "installs" can be read as a requirement that a new or different integrated system be installed, and does not account for the possibility that the assessment of the fire system will determine that the existing design is sufficient.

Second, to ensure that all factors affecting the design of the fire protection system are adequately considered, the Project Owner proposes deletion of the term, "code compliant". The Commission's Final Decisions for each of the Geysers Units, the laws, ordinances, regulations, and standards ("LORS") applicable at the time of approval, current LORS where appropriate, and the ability to pursue alternate means of protection upon meeting certain requirements, are all factors affecting the design and performance of fire protection systems for the Geysers Units. The Project Owner's proposed changes to Staff's revised condition language is highlighted below, with additions shown in double underlined font and deletions in double strikethrough font.

WORKER SAFETY-1 The project owner shall physically disconnect the piping connection between the cooling tower wet-down system and the plant's fire protection system unless the project owner installs a code compliant integrated wet down/fire protection system is approved by the CPM after obtaining the approval of the CPM. Approval of the installation of an approved integrated system terminates the requirement to disconnect the system.

The Project Owner proposes that the verification language be clarified as follows. First, to provide clarity as to the process that would be followed to determine whether physical disconnection is required, the Project Owner proposes the addition of a clear statement that the

Project Owner will provide notice to the CPM of the outcome of the review of the fire protection system and whether the Project Owner will proceed with physical disconnection. The Project Owner also proposes additional language that clarifies that physical disconnection is required by a certain date unless the CPM has approved integration of the wet-down system and the fire protection system. Finally, the Project Owner agrees that the CEC has the authority to approve an alternate means of fire protection, but does not believe that a reference to a specific citation is necessary in this case, particularly where the referenced sections introduce procedural requirements that may not necessarily be applicable to the CEC's regulatory process. The Project Owner's proposed changes to Staff's revised verification language is highlighted below, with additions shown in double underlined font and deletions in double strikethrough font.

VERIFICATION: Upon completion of the project owner's evaluation of the fire protection system and cooling tower wet-down system, the project owner will notify the CPM if physical disconnection is required to ensure the reliability and effectiveness of the fire protection system. If required, the project owner shall complete the physical disconnection of the cooling tower wet-down system from the plant's fire protection system no later than January 1, 2019 or a later date agreed upon by the CPM. June 1, 2019, unless the CPM has approved the integrated system prior to that date. Within 10 days after the disconnection the project owner shall submit a letter stating that the physical disconnection has occurred and provide a photograph showing the disconnection. The CPM may approve a later date for disconnection upon request by the project owner. if the project owner has submitted a request for alternate means of protection pursuant to Title 24 California Fire Code section 1.11.2.4 to the CPM for review and approval. ~~The CPM shall be notified at least 30 days prior to the current disconnection date, if the project owner wishes to seek an extension to the current disconnection date. The project owner shall submit a letter stating that the physical disconnection has occurred and provide the final DCBO approved design drawings along with photographs showing the implementation no later than 30 days after the disconnection.~~

CONCLUSION

The Project Owner recommends that the Commission proceed at the November 7, 2018 Business Meeting with consideration and approval of the *Consolidated Petition*, with the Air Quality conditions proposed by Staff and the revised WS-1 condition proposed by the Project Owner.

Respectfully submitted,

/s/

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ATTACHMENT A

Project Owner's Proposed Changes to
Staff's Revisions to Air District Permit Conditions

Quicksilver Geothermal (PG&E Geysers 16) (79-AFC-05)

- AQ-1G** Visible emissions shall not exceed the values listed below for more than three (3) minutes in any one (1) hour:
- Ringelmann 0.5 (10% opacity) for combustion emissions engine exhaust; and
 - Ringelmann 1 (20% opacity) for road and construction dust emissions.

Verification: The project owner shall perform a Visible Emissions Evaluation to determine compliance as requested by the LCAQMD ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, and Energy Commission upon request.

- AQ-E2C** Should total hours of operation for E1 exceed usage hours that result in a prioritization score of 10 or above, a Health Risk Assessment and/or additional emission reductions may be required.

Verification: The project owner shall perform a Health Risk Assessment or reduce emissions as requested by the LCAQMD ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, and Energy Commission upon request.

- AQ-5C** The project owner shall annually conduct a comprehensive emissions test. The incoming steam, condensate, circulating water and cooling tower stack shall be tested for H₂S, ammonia, arsenic, boron, hexavalent chrome, mercury, radon 222, and particulates as appropriate. The APCO ~~or CPM~~ may request analysis for additional components and testing at other process points upon reasonable request and in a manner necessary to comply with AB 2588 or other applicable law(s). The annual test plan shall be submitted for LCAQMD review and approval 45 days prior to the planned test. The results of the test shall be provided to the LCAQMD within 60 days of the completion of the test, or as soon as practicable.

Verification: The project owner shall provide the CPM a copy of the approved annual test plan. The project owner shall summarize compliance in the Annual Compliance Report. The project owner shall make the site and records available for inspection by representatives of the District, ARB, and Energy Commission upon request.

- AQ-5D** The project owner shall fund, participate in, or cause to be performed ambient monitoring for H₂S, wind speed and direction, temperature and rainfall at a location within the Anderson Springs area approved by the APCO for the operational life of the plant. The project owner shall participate in, fund, or cause to be performed, additional ambient monitoring as reasonably requested by the APCO upon

determination that plant emissions are an air quality concern. The H2S and meteorological data shall be immediately available to the LCAQMD and data reports, in a format acceptable to the LCAQMD, shall be submitted on a quarterly basis. A joint monitoring effort on an equitable basis with other developers such as GAMP shall be acceptable. Upon written request of the APCO ~~or CPM~~, the project owner shall install, operate and maintain a meteorological monitoring station at the power plant site. It shall be located, the results reported, and access to data provided as determined by the APCO.

Verification: If the project owner does not participate in GAMP, the project owner shall submit to the LCAQMD ~~and CPM~~, for their review and approval, a detailed ambient monitoring plan. The project owner shall submit any ambient monitoring plan to the CPM for review. The project owner shall submit the District's approval, disapproval, or plan modification to the CPM in the following quarterly report.

AQ-E5A The herein permitted facility shall not cause a public nuisance nor make a measurable contribution to any Ambient Air Quality Standard exceedance. Should this facility result in odor or health complaints, the LCAQMD may require under Sections 430 and 670, monitoring, testing, and mitigation by the project owner to abate said condition.

Verification: The project owner shall perform monitoring and testing as requested by the LCAQMD ~~or CPM~~, the project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

Socrates Geothermal (PG&E Geysers 18) (79-AFC-03C)

AQ-A4 The project owner shall operate the power plant and associated abatement systems in compliance with Regulation 1 Rule 420 (d) Non-Combustion Sources-Particulate Matter; no person shall discharge particulate matter into the atmosphere from a non-combustion source in excess of 0.2 grains per cubic foot of exhaust gas or in total quantities in excess of the amount shown in Table I. (40 lb/hr) whichever is the more restrictive condition. [ref. Rule 420(d)]

Verification: The project owner shall perform a source test to determine compliance as requested by the NSCAPCD ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-AE1 Visible particulate emissions shall not exceed an opacity as to obscure an observer's view to a degree equal to or greater than Ringelmann 2.0 or 40 percent opacity for a period or periods exceeding 3 minutes in any one hour [ref. PTO 17-10 Cond. B1]

Verification: The project owner shall perform a Visible Emissions Evaluation to determine compliance as requested by the NSCAPCD ~~or CPM~~, the project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-AE3 Combined non-methane hydrocarbons and nitrogen oxide emissions shall not exceed an emission rate of 3.0 g/bhp-hr. [ref. PTO 17-09 Cond. B3]

Verification: The project owner shall perform a source test to verify compliance with the emission rate upon request of the District ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-C3 The project owner, as requested by the Air Pollution Control Officer ~~or CPM~~, shall conduct a requestor-approved performance test for particulate matter (PM), H₂S, other species (i.e. benzene, mercury, arsenic, TRS, mercaptans, radon, other nitrogen compounds (amines) and compounds listed under NESHAPS and/or AB2588 from the power plant evaporative cooling tower and/or the Stretford evaporative cooling tower. Upon written request, the project owner shall submit to the requestor at least 45 days prior to testing a detailed performance test plan. The requestor shall approve, disapprove or modify the plan within 45 days of receipt of the plan. The project owner shall incorporate the Requestor's comments or modifications to the plan which are required to assure compliance with the requestor's regulations. The Air Pollution Control Officer shall be notified 15 days prior to the test date in order to arrange for an observer to be present for the test. The test results shall be provided to the District and CPM within 45 days of the test date unless a different submittal schedule is approved in advance. [ref. PTO 79-25a Cond. 9 and 10]

Verification: The project owner shall conduct performance tests as requested by the Air Pollution Control Officer ~~or CPM~~. The project owner shall submit results to the CPM within 45 days if the test was requested by the CPM or in the quarterly reports according to Condition **AQ-E1**.

AQ-C8 All sampling protocols, chemical feed charts, targets and operational guidelines for using said charts and targets, necessary to abate H₂S emissions from the power plant to the emission limits specified in Conditions **AQ-A1** and **AQ-A2** must be developed using good engineering judgment and supporting data. The APCO ~~or CPM~~ may review such sampling protocols, chemical feed charts, targets and guidelines upon request. If the APCO ~~or CPM~~ determines that any of the protocols, feed charts, targets, or guidelines are not sufficient to maintain compliance with Conditions **AQ-A1** and **AQ-A2**, the APCO ~~or CPM~~ shall require the project owner to develop revised protocols, feed charts, targets and guidelines. [ref. Rule 240(d)]

Verification: The project owner shall submit any revised protocol, feed charts, targets and guidelines or summary to the CPM in the annual reports required by Condition **AQ-E2**. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-C10 Ambient Air Monitoring

The project owner shall maintain and operate one H₂S/meteorological monitoring station, PM10 high volume station at a location approved in advance by the Air Pollution Control Officer for the life of the facility. The project owner shall install and operate additional monitoring stations, such as a PM2.5 monitoring station, if required by the Air Pollution Control Officer, **Energy Commission**, California Air Resources Board, or U.S. EPA. Participation by the project owner in a joint air monitoring program, such as the Geysers Air Quality Monitoring Program (GAMP), shall be deemed to satisfy all ambient air quality monitoring requirements of this license provided the term of monitoring is equivalent. The Air Pollution Control Officer can alter, suspend, or cancel this requirement provided no ambient air quality standard applicable to this facility is threatened or that sufficient other monitoring is available by the District, Lake County AQMD, or other third party. [ref. PTO 79-25A Cond. 22]

Verification: If the project owner does not participate in GAMP, the project owner shall submit to the NSCAPCD ~~ARB, and CPM, for their~~ review and approval, a detailed ambient monitoring plan. The project owner shall submit the District's approval, disapproval or plan modification to the CPM in the quarterly report.

Grant Geothermal (PG&E Geysers 20) (82-AFC-01C)

AQ-A7 The project owner shall operate the power plant and associated abatement systems in compliance with Regulation 1 Rule 420 (d) Non-Combustion Sources- Particulate Matter; no person shall discharge particulate matter into the atmosphere from a non-combustion source in excess of 0.2 grains per cubic foot of exhaust gas or in total quantities in excess of the amount shown in Table I. (40 lb/hr) whichever is the more restrictive condition. [ref. Rule 420(d)]

Verification: The project owner shall perform a source test to determine compliance as requested by the NSCAPCD ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-AE1 Visible particulate emissions shall not exceed an opacity as to obscure an observer's view to a degree equal to or greater than Ringelmann 2.0 or 40 percent opacity for a period or periods exceeding 3 minutes in any one hour [ref. PTO 17-10 Cond. B1]

Verification: The project owner shall perform a Visible Emissions Evaluation to determine compliance as requested by the NSCAPCD ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-AE3 Combined non-methane hydrocarbons and nitrogen oxide emissions shall not exceed an emission rate of 3.0 g/bhp-hr. [ref. PTO 17-10 Cond. B3]

Verification: The project owner shall perform a source test to verify compliance with the emission rate upon request of the District ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-AE4 Carbon monoxide emissions shall not exceed an emission rate of 2.6 g/bhp-hr. [ref. PTO 17-10 Cond. B4]

Verification: The project owner shall perform a source test to verify compliance with the emission rate upon request of the District ~~or CPM~~. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-B10 The project owner shall operate and maintain the following air pollution control equipment:

- a. The non-condensable gas stream exiting from the surface condenser shall be ducted to an operating Stretford process unit.
- b. Condensate exiting from the surface condenser shall be treated as necessary to reduce the levels of dissolved hydrogen sulfide. The project owner shall use a secondary abatement system authorized by the NSCAPCD to accomplish this reduction.

- c. The project owner shall have installed drift controls on the power plant cooling tower to limit drift losses to 0.002 percent or better of the circulating water mass, thus minimizing emissions of particulate matter. [ref. PSD SFB 81-03 Cond. IX.B.]

Verification: The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-B11 The project owner shall, in any 12 month period, limit unscheduled outages for the project to no more than a total of 12. The following shall not be used in computing the total outages.

- a. Scheduled outages (defined as outages with 24 hour advance notice between the steam supplier and project owner, except in the case of project outages resulting from an abundance of hydropower in which case a scheduled outage shall be defined as one hour notice).
- b. Steam supplier induced outages (such as pressure surge, strainer plugging, etc.).
- c. Outages of less than 2 hours in duration.
- d. Outages which do not cause steam stacking.

A violation of the above performance standards is considered a violation of this condition.

The project owner shall have on file with the District an approved operating protocol describing the methods that will be used to meet the 12 outages in 12 consecutive months performance standard. The protocol must include a description of the operational procedures between the steam supplier and project owner, project owner's operational procedures, and equipment to meet the above standard. The terms and requirements of the protocol may be modified by the Air Pollution Control Officer **and CPM** for good cause upon written request from the project owner.

The project owner shall allow the District and CPM to inspect all operating logs to verify the total outage hours. These requirements are in addition to the applicable requirements of rule 540.

In the event the project owner is not able to meet the standards specified above, the following shall be required:

The project owner shall prepare and submit a revised "plan" to the Air pollution Control Officer **and CPM**, within 30 days of the end of the month in which the outage limit was exceeded, to achieve the outage standards set forth in this permit condition. At a minimum, the measures to be considered in the "plan" shall include: improved coordination of the power plant and steam

field operations, improved alarming and control systems, increased duration of manned operation of the power plant, improved preventative maintenance and design modifications, retrofit of a 100% of steam flow turbine bypass, and retrofit of a 50% of steam flow turbine bypass. In evaluating measures to be taken to prevent future exceedances of the outage standard, outages of less than 2 hours shall be counted. This “plan” shall also be submitted to EPA for approval if the outage standard is exceeded.

Within 30 days of receipt of the “plan” the Air Pollution Control Officer shall determine whether the “plan” is satisfactory and, if so, shall approve the “plan”. Upon approval, the revised “plan” shall supersede the old plan and become a part of the terms and conditions of this permit. [ref. PSD SFB 81-03 Cond. IX.C., PTO-82-45A Cond.18]

Verification: The project owner shall submit any revised plan to the CPM for approval review. The project owner shall submit the District’s approval, disapproval, or plan modification to the CPM in the following quarterly report.

AQ-C1 The project owner shall, on a monthly basis, conduct a source test of the cooling tower to determine the H₂S emission rate to verify compliance with condition **AQ-A1**. A mass balance determination of total H₂S to the cooling tower based on measured operating conditions may be used to document that the worst case possible H₂S emissions are less than the emission limit of the plant or District Method 102 shall be utilized to determine the H₂S emission rate. The project owner may propose an Alternative Compliance Plan (ACP) which allows for operating flexibility of the power plant, including periods when accessing the cooling tower is not possible, while maintaining compliance with all applicable emission limits of Condition **AQ-A1**. The ACP shall list operating parameters such as power output (MW), target pH, abatement solution concentration levels, and burner/scrubber exit concentrations which shall be met in order to meet all applicable emission limits listed above. The ACP shall be submitted to the APCO and CPM for approval. The APCO shall approve, disapprove or modify the plan within 30 days of receipt of the ACP. An APCO-approved ACP shall consist of all parametric operating guidelines which shall be used to determine compliance with Condition **AQ-A1**. The ACP shall list the specific operating conditions the ACP will supersede. [ref. PTO 82-45A Cond. 22]

Verification: The project owner shall submit source test results according to Condition **AQ-E1**. The project owner shall submit any ACP to the CPM for review. The project owner shall submit the District’s approval, disapproval or plan modification to the CPM in the following quarterly report.

AQ-C4 The project owner, as requested by the Air Pollution Control Officer or CPM, shall conduct a requestor-approved performance test for particulate matter (PM), H₂S, other species (i.e. benzene, mercury, arsenic, TRS, mercaptans, radon, other nitrogen compounds (amines) and compounds listed under

NESHAPS and/or AB2588 from the power plant evaporative cooling tower and/or the Stretford evaporative cooling tower. Upon written request, the project owner shall submit to the requestor at least 45 days prior to testing a detailed performance test plan. The requestor shall approve, disapprove or modify the plan within 45 days of receipt of the plan. The project owner shall incorporate the requestor's comments or modifications to the plan which are required to assure compliance with the requestor's regulations. The Air Pollution Control Officer shall be notified 15 days prior to the test date in order to arrange for an observer to be present for the test. The test results shall be provided to the District ~~and CPM~~ within 45 days of the test date unless a different submittal schedule is approved in advance. [ref. PTO 82-45a Cond. 9 and 10]

Verification: The project owner shall conduct performance tests as requested by the Air Pollution Control Officer ~~or CPM~~. The project owner shall submit results to the CPM ~~within 45 days if the test was requested by the CPM or~~ in the quarterly reports according to Condition **AQ-E1**.

AQ-C9 All sampling protocols, chemical feed charts, targets and operational guidelines for using said charts and targets, necessary to abate H₂S emissions from the power plant to the emission limits specified in Conditions **AQ-A1** and **AQ-A2** must be developed using good engineering judgment and supporting data. The APCO ~~or CPM~~ may review such sampling protocols, chemical feed charts, targets and guidelines upon request. If the APCO ~~or CPM~~ determines that any of the protocols, feed charts, targets, or guidelines are not sufficient to maintain compliance with Conditions **AQ-A1** and **AQ-A2**, the APCO ~~or CPM~~ shall require the project owner to develop revised protocols, feed charts, targets and guidelines. [ref. Rule 240(d)]

Verification: The project owner shall submit any revised protocol, feed charts, targets and guidelines or summary to the CPM in the annual reports required by Condition **AQ-E2**. The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.

AQ-C11 Ambient Air Monitoring

The project owner shall maintain and operate one H₂S/meteorological monitoring station, PM10 high volume station at a location approved in advance by the Air Pollution Control Officer for the life of the facility. The project owner shall install and operate additional monitoring stations, such as a PM2.5 monitoring station, if required by the Air Pollution Control Officer, ~~Energy Commission~~, California Air Resources Board or U.S. EPA. Participation by the project owner in a joint air monitoring program, such as the Geysers Air Quality Monitoring Program (GAMP), shall be deemed to satisfy all ambient air quality monitoring requirements of this license provided the term of monitoring is equivalent. The Air Pollution Control Officer can alter, suspend, or cancel this requirement provided no ambient air quality standard applicable to this facility is threatened or that sufficient other

monitoring is available by the District, Lake County AQMD or other third party.
[ref. PTO 82-45A Cond. 22, PSD SFB 81-03, 82-AFC-1 Cond. 13.]

Verification: If the project owner does not participate in GAMP, the project owner shall submit to the NSCAPCD, ARB, and CPM, for their review and approval, a detailed ambient monitoring plan. The project owner shall submit any ambient monitoring plan to the CPM for review. The project owner shall submit the District's approval, disapproval, or plan modification to the CPM in the following quarterly report.

Emergency Engine

AQ-CE1 At any time as specified by the Air Pollution Control Officer or CPM, the operator of this source shall conduct a requestor-approved source test to determine NOx and particulate emissions from the diesel powered generator. The test results shall be provided to the District and CPM within 30 days of the test [ref. PTO 17-10 Cond. D1]

Verification: The project owner shall perform an approved source test upon request of the District or CPM. Test results shall be submitted to the District and CPM.

Quicksilver (79-AFC-05C), Socrates (79-AFC-03C), Grant (82-AFC-01C)
Comments on the *Staff Analysis of the Petition to Amend- Permanent Diesel Pump for
Cooling Tower Wetting System*

ATTACHMENT B

**Project Owner's Proposed Clarifying Changes to
Staff's Revised Worker Safety-1 Condition of Certification**

WORKER SAFETY-1 The project owner shall physically disconnect the piping connection between the cooling tower wet-down system and the plant's fire protection system unless the integrated wet down/fire protection system is approved by the CPM. Approval of the integrated system terminates the requirement to disconnect the system.

VERIFICATION: Upon completion of the project owner's evaluation of the fire protection system and cooling tower wet-down system, the project owner will notify the CPM if physical disconnection is required to ensure the reliability and effectiveness of the fire protection system. If required, the project owner shall complete the physical disconnection of the cooling tower wet-down system from the plant's fire protection system no later than June 1, 2019, unless the CPM has approved the integrated system prior to that date. Within 10 days after the disconnection the project owner shall submit a letter stating that the physical disconnection has occurred and provide a photograph showing the disconnection. The CPM may approve a later date for disconnection upon request by the project owner. The CPM shall be notified at least 30 days prior to the current disconnection date, if the project owner wishes to seek an extension to the current disconnection date.