

DOCKETED

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Russell City Energy Company, LLC

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April 28, 2017

Eric Veerkamp
Compliance Project Manager
Siting, Transmission and
Environmental Protection (STEP Division)
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

RE: Docket No. 01-AFC-07C: Petition for Modification

Dear Mr. Veerkamp:

On behalf of the Russell City Energy Center (“Project”), Russell City Energy Company, LLC (“Project Owner”) submits this Petition for Modification. The Project Owner requests that California Energy Commission Staff approve the permanent installation of the storage tank as this action: (1) will not have a significant effect on the environment; (2) will not result in a change or deletion of a condition of certification; and (3) will not make changes that would cause the Project to not comply with any applicable laws, ordinances, regulations, or standards (“LORS”).

If you have any questions regarding the proposed modification, please contact Barbara McBride at 925-570-0849 or Barbara.McBride@calpine.com.

Sincerely,

/S/

Barbara McBride

Russell City Energy Center

(01-AFC-07C)

Petition for Modification

Submitted by

Russell City Energy Company, LLC

April 2017

Russell City Energy Company, LLC
Russell City Energy Center (01-AFC-07C)
PETITION FOR MODIFICATION

Pursuant to Section 1769 of the California Energy Commission's Siting Regulations, Russell City Energy Company, LLC ("Project Owner") hereby submits this petition for modification of the Russell City Energy Center ("Project").¹

The Project Owner requests that Staff approve this modification. As set forth below, Staff approval is appropriate as the modification: (1) will not have a significant effect on the environment; (2) will not result in a change or deletion of a condition of certification; and (3) will not make changes that would cause the Project to not comply with any applicable laws, ordinances, regulations, or standards ("LORS").

I. Section 1769 (a)(1)(A): Description of the proposed modifications, including new language for affected conditions.

The Project Owner proposes to permanently install a 6,667 gallon tank for storage of sodium hydroxide, which will be used in the Project's zero liquid discharge (ZLD) facility and cooling tower for pH control. This on-site tank will be installed adjacent to the Project's ZLD facility, and will replace the temporary tanks and temporary secondary containment structures that are currently used by the Project in that location. The tank is double-walled for secondary containment purposes and will be approximately 15 feet $\frac{3}{4}$ inches high, and 10 feet 2 inches in diameter. It will be placed on a permanent concrete foundation that measures 16 feet by 16 feet with a 6-inch curb.

No conditions of certification are affected by the proposed modification.

II. Section 1769 (a)(1)(B): Discussion of the necessity for the modifications.

The proposed modification is necessary to support ongoing cooling tower and ZLD operations. The proposed modification will benefit the Project Owner by replacing the temporary tanks and temporary secondary containment structures currently in use at the Project with a permanent structure.

III. Section 1769(a)(1)(C): Discussion of whether the modification is based on information that was known by the petitioner during the certification proceeding.

The proposed modification is not based upon information that was known during the certification proceeding for the Project.

¹ Project Owner files this Petition for Modification out of an abundance of caution and at the request of Staff. As noted above, this installation does not have any impact on any of the Conditions of Certification or any of the Section 1769(a) considerations.

IV. Section 1769(a)(1)(D): Discussion of whether the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, and explanation of why the change should be permitted.

The need to replace the temporary tank with a permanent tank is not based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the Commission's decision certifying the Project.

V. Section 1769(a)(1)(E): Analysis of the impacts the modifications may have on the environment and proposed measures to mitigate any significant adverse impacts.

The proposed modification is categorically exempt from the California Environmental Quality Act ("CEQA") pursuant to Title 14, Sections 15301 and 15303 of the California Code of Regulations. The proposed conversion of temporary tank to a permanently installed tank is categorically exempt under Section 15301 as a minor alteration of the existing Project that involves no expansion of an existing use. Additionally, the proposed modification is categorically exempt under Section 1503 as a conversion of an existing small structure from one use to another. In short, the applicable categorical CEQA exemptions confirm that there is no possibility that the proposed modification will result in any significant adverse environmental impacts; thus, no further mitigation measures are required.

A brief analysis for each major subject area identified in the Final Decision is provided below.

Air Quality: The proposed modification will not affect emissions from the Project and will support continued safe, reliable and effective operation of the cooling tower and ZLD. The Project will continue to meet all existing emissions limits established in the existing permits. The proposed modification will not have a significant impact to air quality.

Biological Resources: The proposed modification will occur entirely on site, and will not result in any significant physical modification to the site. No sensitive biological resources or habitat occur on site. Because the entire site is currently developed and used for existing Project operations, the proposed modification will not have a significant impact to biological resources.

Visual Resources: The proposed modification will permanently install a tank for use for the storage of water treatment chemicals. The proposed modification will not substantially degrade the existing visual character or quality of the site or its surroundings. The proposed modification will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, the proposed modification will not have a significant impact to visual resources.

VI. Section 1769(a)(1)(F): Discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards.

The proposed modification will not impact the Project's ability to comply with applicable LORS.

VII. Section 1769(a)(1)(G): Discussion of how the modifications affect the public.

The proposed modification will not adversely affect the public. The modification will occur entirely on site, will not negatively impact air quality or public health, and will not result in a visual resources impact. Therefore, there are no significant adverse effects on property owners that will result from the proposed modification.

VIII. Section 1769(a)(1)(H): List of property owners potentially affected by the modification.

The proposed modification will have no significant environmental effects and will be in compliance with applicable LORS. Therefore, no property owners will be affected by the modification, and a list is not provided as part of this petition.

IX. Section 1769(a)(1)(I): Discussion of the potential effect on nearby property owners, the public and the parties in the application proceeding.

The proposed modification will have no significant environmental effects and will be in compliance with all applicable LORS. Therefore, the proposed changes will have no adverse impacts on property owners, the public, or any parties in the application proceeding.