DOCKETED					
Docket Number:	06-AFC-09C				
<b>Project Title:</b>	Colusa Generating Station - Compliance				
TN #:	203610				
<b>Document Title:</b>	Application for Staff Approved Project Change to Amend Docket				
<b>Description:</b>	Fin Fan Cooler				
Filer:	Charles Robert Price				
Organization:	Pacific Gas & Electric Co.				
Submitter Role:	Applicant				
Submission Date:	2/6/2015 9:17:02 AM				
Docketed Date:	2/6/2015				



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CGS15-L-009 February 6, 2015

Eric Veerkamp California Energy Commission 1516 Ninth Street, MS-2000 Sacramento, CA 95814

#### Subject: Petition To Amend The Commission Decision For The Colusa Generating Station.

#### Docket NO. 06-AFC-09

Dear Eric:

Pursuant to Section 1769 of the California Energy Commission (CEC) Siting Regulations, Colusa Generating Station (CGS) hereby submits the attached Petition for a Staff Approved Project Change to Amend Docket No. 06-AFC-09. The requested changes do not affect the project description or any Conditions of Certification in the Commission Decision or subsequent amendments.

The CGS plans to add a fin fan cooling apparatus to dry cool the Heat Recovery Steam Generator (HRSG) Blowdown effluent water in order for the temperature to meet the necessary specifications to be reprocessed through the facilities Ultra Filtration system for immediate reuse as process water. Through the operation of the facility it has been determined that the attemporation of the blowdown is inadequate.

The proposed changes will not impact the environment, will not conflict with any applicable laws, ordinances, regulations or standards, and the improvements do not result in a significant change in operation. This petition along with the proposed modified general arrangement drawing is being submitted per the request of CEC staff. CGS staff will work with Bureau Veritas for design, installation and construction compliance confirmation.

If you have any questions regarding this submittal, please feel free to call me at (530) 934-9007.

Sincerely,

Charles Price Senior Environmental Consultant

cc: File No. 3.6.3.16

Ed Warner, PGE Jim Moen Sarah Gassner, PGE

#### COLUSA GENERATING STATION APPLICATION FOR STAFF APPROVED PROJECT CHANGE

As required by Section 1769 of the CEC Siting Regulations, Colusa Generating Station (CGS) hereby submits the following information in support of a staff approved project change.

# Pursuant to Section 1769(a)(1)(A) and (B), this section provides a complete description of the proposed modifications, including new language for affected conditions, and the necessity for modifications.

The CGS plans to install dry cooling equipment, specifically fin fan units, to reduce the temperature of effluent water from the Heat Recovery Steam Generating (HRSG) unit blowdown tanks.

Currently, the HRSG blowdown system is unable to sufficiently attemporate the effluent to less than 110° F at the Ultrafiltration (UF) feed tank. Water temperatures greater than 110° F will damage the fibers in the UF modules. Once the upper limit is reached the UF is tripped off-line, preventing the generation of demineralized water until the temperature is lowered below the upper limit. Under the original plant configuration, the hot water is bypassed to the Raw Water tank. The raw water is the source of HRSG blowdown quench water, thus exacerbating the issue with attemporation.

To solve the issue, a permanent system modification consisting of the addition of a two fan, single cell, fin fan air cooler, will be installed to remove sufficient heat from the HRSG effluent. The modification will include redirecting the effluent prior to the UF Feed Tank to the fin fan cooler. The effluent of the fin fan will pass directly into the UF Feed Tank at a temperature <110 F.

## Pursuant to Section 1769(a)(1)(C), a discussion is required if the modification is based on information that was known by the petitioner during the certification proceeding, and an explanation of why the issue was not raised at that time.

The need for the improvement was discovered through operation of the facility.

# Pursuant to Section 1769(a)(1)(D), a discussion is required on 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 addition of a fin fan cooler for HRSG Blowdown water does not change or undermine the assumptions, rationale, findings, or other bases of the final decision.

The change should be permitted as there are no significant impacts as a result of the fin fan addition. The change will increase the efficiency of the water treatment system and no Conditions of Certification will be affected.

## Pursuant to Section 17699(a)(1)(E), an analysis of the impacts the modifications may have on the environment and proposed measures to mitigate any significant adverse impacts is required.

The facility will continue to meet all existing environmental regulations. The system uses dry cooling so no additional water usage or potential increase in air emissions from particulate will occur. There will be no addition or increases in chemical use at the facility as a result of the fin fan addition.

## Pursuant to Section 17699(a)(1)(F), a discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards is required.

The facility improvement will not have an impact on the facility's ability to comply with applicable laws, ordinances, regulations and standards.

#### Pursuant to Section 1769(a)(1)(G), a discussion of how the modifications affect the public is required.

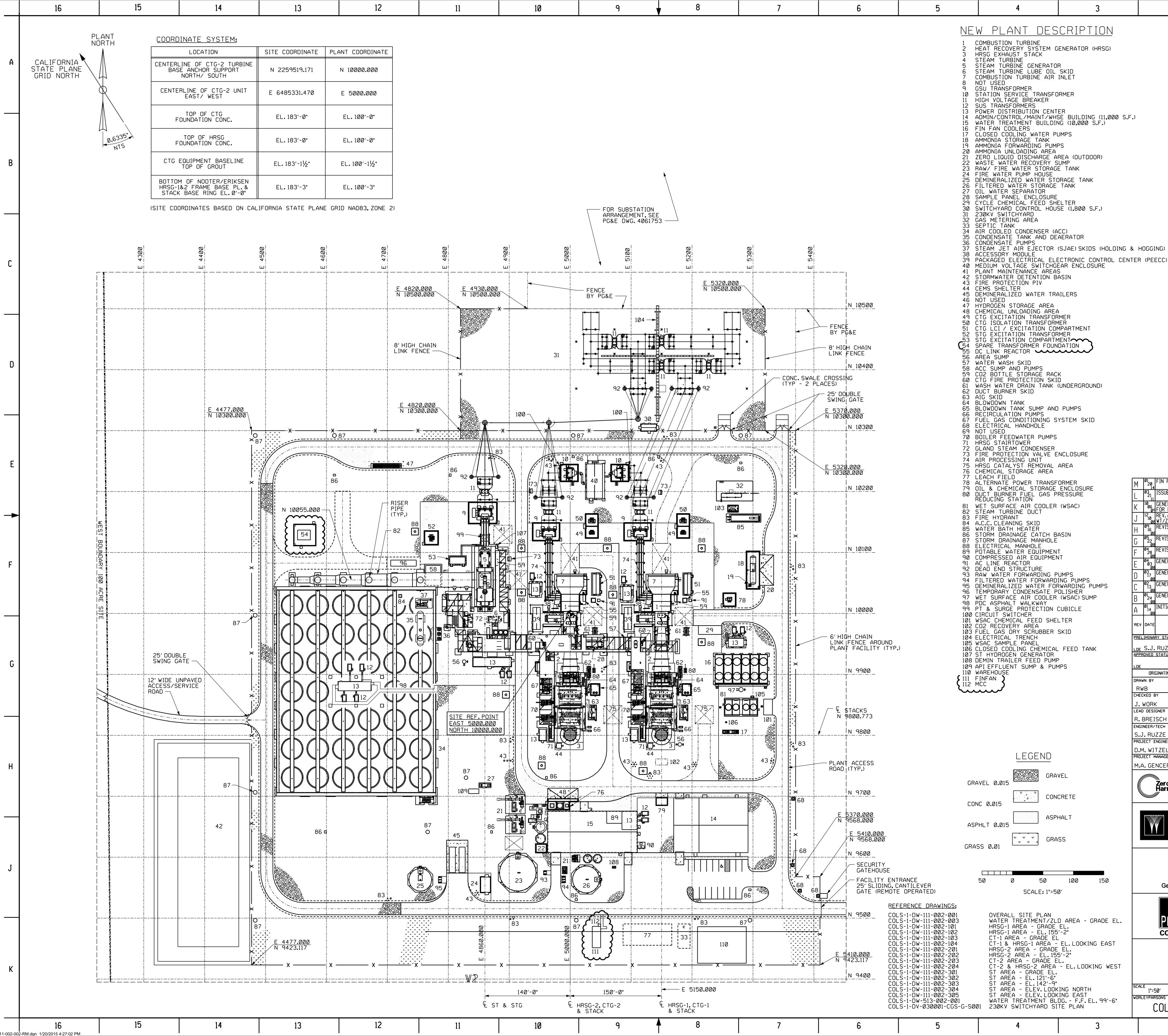
The proposed upgrade will have no significant environmental effects and will be in compliance with applicable LORS, therefore there will be no effects to the public.

#### Pursuant to Section 1769(a)(1)(H), a list of property owners potentially affected by the modification is required.

The proposed upgrade will have no significant environmental effects and will be in compliance with applicable LORS, therefore there will be no effects to the property owners.

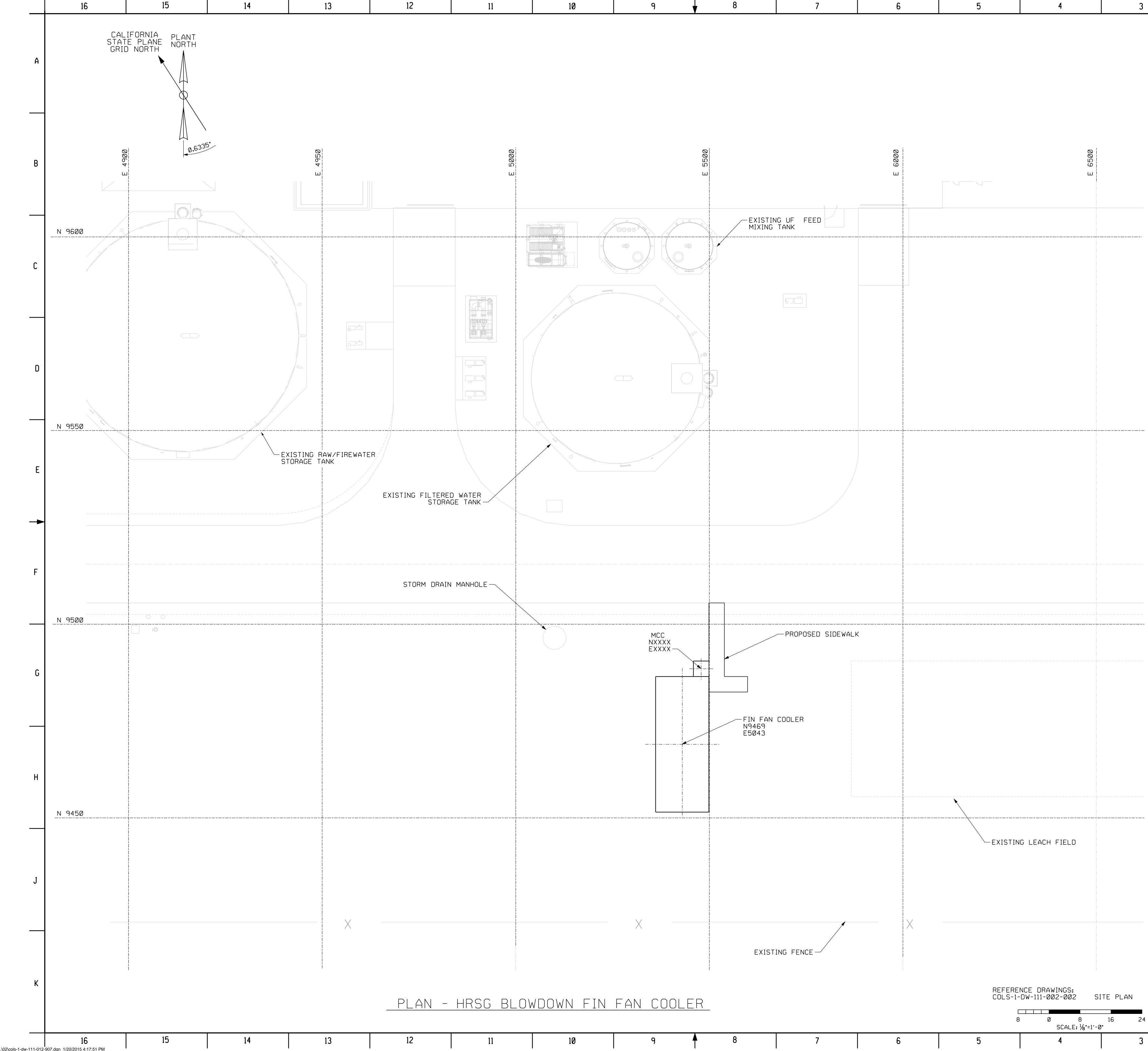
## Pursuant to Section 1769(a)(1)(I), a discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings is required.

The proposed upgrade will have no significant environmental effects and will be in compliance with applicable LORS, therefore there will be no effects to the property owners, the public or other properties.



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