Docket Number:	06-AFC-07C
Project Title:	Humboldt Bay Generating Station - Compliance
TN #:	206000
<b>Document Title:</b>	Petition for Project Modification- Temporary Tent
<b>Description:</b>	N/A
Filer:	Jonathan Fong
Organization:	PG&E/ Humbolt Bay Generating Station PM/ Chuck Holm
<b>Submitter Role:</b>	Public
Submission Date:	9/3/2015 10:06:07 AM
<b>Docketed Date:</b>	9/3/2015



HBGS-CEC-104

August 19, 2015

Mr. Jonathan Fong Compliance Project Manager California Energy Commission Energy Facilities Siting and Compliance Division 1516 Ninth Street, MS 2000 Sacramento, California 95814-5512

Subject: Humboldt Bay Generating Station - Petition for Project Modification (06-AFC-07C), Installation of Temporary Tent

Dear Mr. Fong:

Enclosed please find a petition for project modification for the Humboldt Bay Generating Station (HBGS), in compliance with Section 1769 of the California Energy Commission Siting Regulations. The purpose of this petition is to allow for the installation of a temporary tent for the storage of large equipment components and spare parts.

A check for \$5,000 in compliance with the recently enacted provisions of SB 83, requiring that a \$5,000 petition fee be submitted with a project modification, is being mailed to you under separate cover.

Should you have any questions, please contact Scott Washington at 707-269-1810.

Sincerely,

Chuck Holm

**Humboldt Bay Generating Station Manager** 

that he

attachment

# Pacific Gas and Electric Company Humboldt Bay Generating Station (06-AFC-7C)

#### **Petition to Modify – Temporary Storage Tent Installation**

Pursuant to the California Energy Commission Siting Regulations (California Code of Regulations Title 20, Section 1769, Post Certification Amendments and Changes), Pacific Gas and Electric Company (PG&E) hereby submits this petition for project modification for the Humboldt Bay Generating Station (HBGS) (06-AFC-7C) to add a temporary tent to be used to store large equipment components and spare parts. PG&E believes the proposed modification constitutes an insignificant project change because it will not result in the modification to any conditions of certification or cause the project to be out of compliance with applicable laws, ordinances, regulations, and standards (LORS). Below is the information required by Section 1769.

## 1. Section 1769 (a)(1)(A) Provide a complete description of the proposed modification, including new language for any conditions that will be affected

When HBGS was being developed, a 5.4 acre area was allocated to it, as this was the space within the existing Humboldt Bay Power Plant (HBPP) site that was available at that time, given the multiple demands of Independent Spent Fuel Storage Installation (ISFSI) construction, operations of the HBPP and, later, it's decommissioning. A workshop and warehouse for the HBGS were part of the original design but would not fit within the available space. A larger site would have required filling the adjacent tidal slough.

HBGS is currently using an off-site warehouse in Arcata. In a petition for project modification filed with the CEC on May 7, 2015, HBGS has proposed conversion of the HBPP Waste Management Building for use as a warehouse, after HBPP decommissioning is complete. In the interim, however, PG&E is proposing to install a temporary tent to store large equipment components and spare parts within the current HBGS boundary. PG&E will continue to use the off-site warehouse until the permanent on-site warehouse is approved and available.

The tent dimensions will be  $25' \times 35' \times 24'$ . Drawings of the tent are included in Attachment 1. The tent will be located adjacent to the Bravo Road access gate to HBGS (see Figure 1). Since HBGS does not currently use Bravo Road for access due to HBPP decommissioning activities, there is space available adjacent to the gate for the temporary tent.

The tent will be placed on existing pavement. There will be no excavations associated with its installation. It will be held in place by 40" spiral anchor stakes, which will be installed along the perimeter of the tent (See Attachment 1, Drawings 5 and 6).

PG&E intends to install the tent as soon as it is approved. The installation will take approximately two days and require approximately four to six workers. The tent will be removed once a permanent onsite warehouse is available and approved.

The tent will be either beige or white in color. It would not be visible to offsite areas since views would be blocked by the engine hall to the east, medium voltage and administration buildings to the west, and transformers and switchyard to the south.

The addition of the temporary tent will not require changes to any Conditions of Certification.

#### 2. Section 1769 (a)(1)(B) Provide a discussion of the necessity for the proposed modification

HBGS does not have an on-site warehouse and currently stores its equipment and spare parts in an offsite warehouse in Arcata, approximately 15 miles (25 minute one-way drive) from the site. The temporary tent will enable HBGS to store essential engine components onsite so they can be accessed more easily and quickly.

Section 1769 (a)(1)(C) - If the modification is based on information that was known by the
petitioner during the certification proceeding, provide an explanation why the issue was not raised
at that time

The decision to add a temporary tent was made after the HBGS was licensed and constructed and it became apparent that space for the tent would be available at the temporarily unusable Bravo Road access way. This modification is therefore not based on information known by the petitioner during the certification proceeding because the needs of the decommissioning program were not known in detail at that time.

4. Section 1769 (a)(1)(D) - If the project modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, provide an explanation of why the change should be permitted

The proposed modification does not undermine the assumptions, rationale, findings, or other basis of the Final Decision for the HBGS. In addition, the proposed modification should be permitted since it will enhance the reliability of the HBGS.

5. Section 1769 (a)(1)(E) – Provide an analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts

No environmental impacts are anticipated with the addition of the temporary tent. The temporary tent will be located within a previously disturbed area of the site, surrounded by other industrial project features. In addition, there will be no excavations associated with installation of the tent. Stakes will be driven into the ground to secure the tent.

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

The addition of the temporary tent will not affect the ability of the HBGS to comply with applicable LORS. There are no environmental impacts associated with the proposed addition.

7. Section 1769 (a)(1)(G) and (H) – Provide a discussion of how the modification affects the public and a discussion of the potential effect on nearby property owners, the public and parties in the application proceedings.

The proposed modification to install a temporary tent will have no impact on the public, nearby property owners, and parties to the proceeding. Installation of the temporary tent will be within the HBGS site boundaries.

8. Section 1769 (a)(1)(H) - Provide a list of property owners potentially affected by the modification Attachment 2 includes the list of property owners within 1,000 feet of the HBGS site.

2



\BALDURIPROJIHUMBOLDTBAY\MAPFILESIHBGS\_LICENSE\_AMEND\TENT\_SITE\_BOUNDARY.MXD\_KNINO 8/19/2015 8:24:11 AN

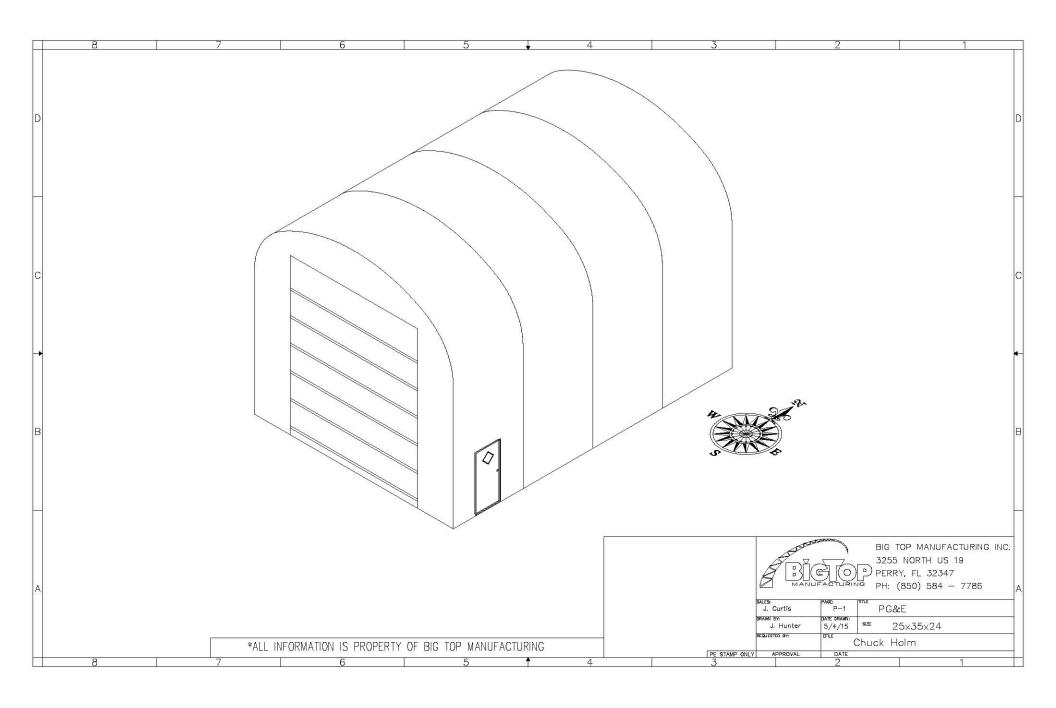
- CH2MHILL

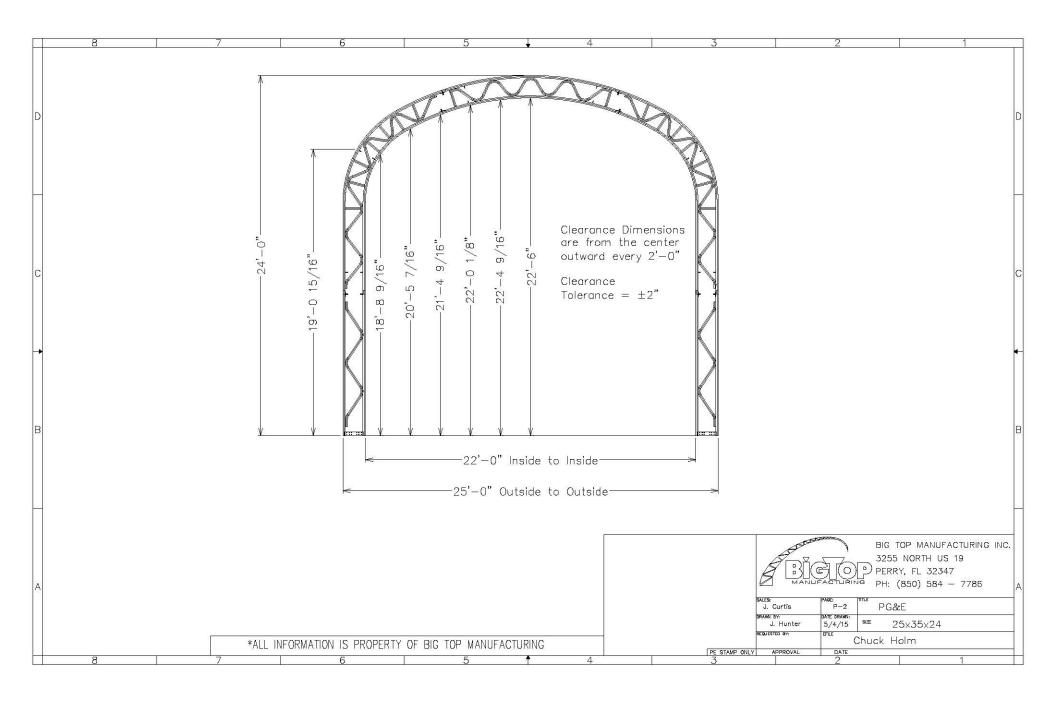
### ATTACHMENT 1

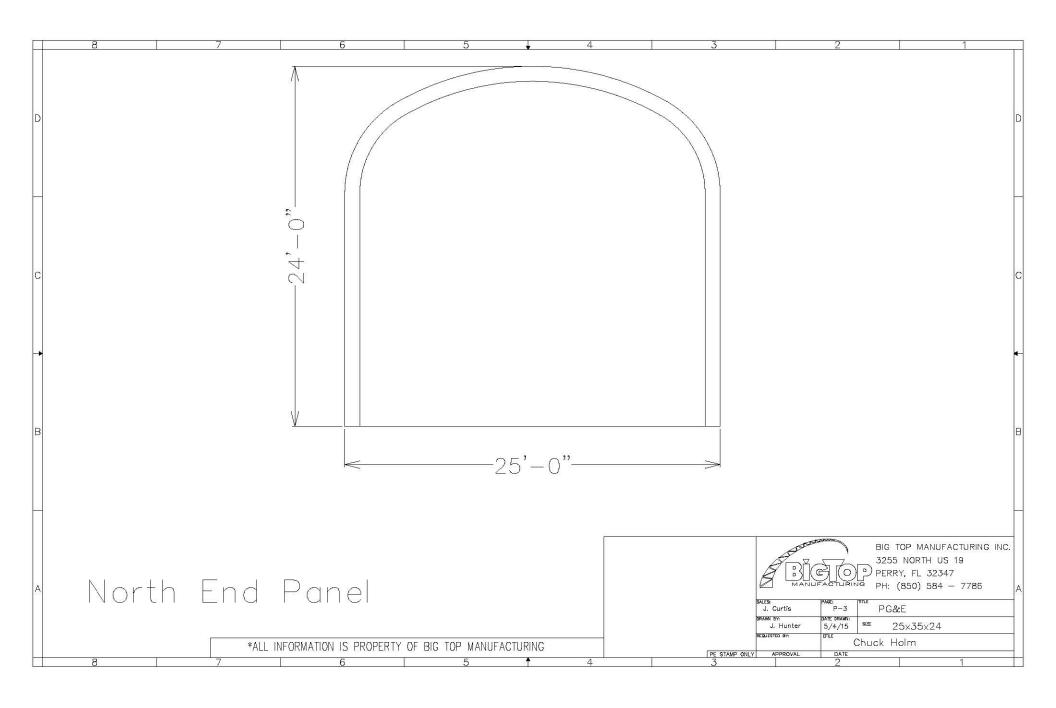


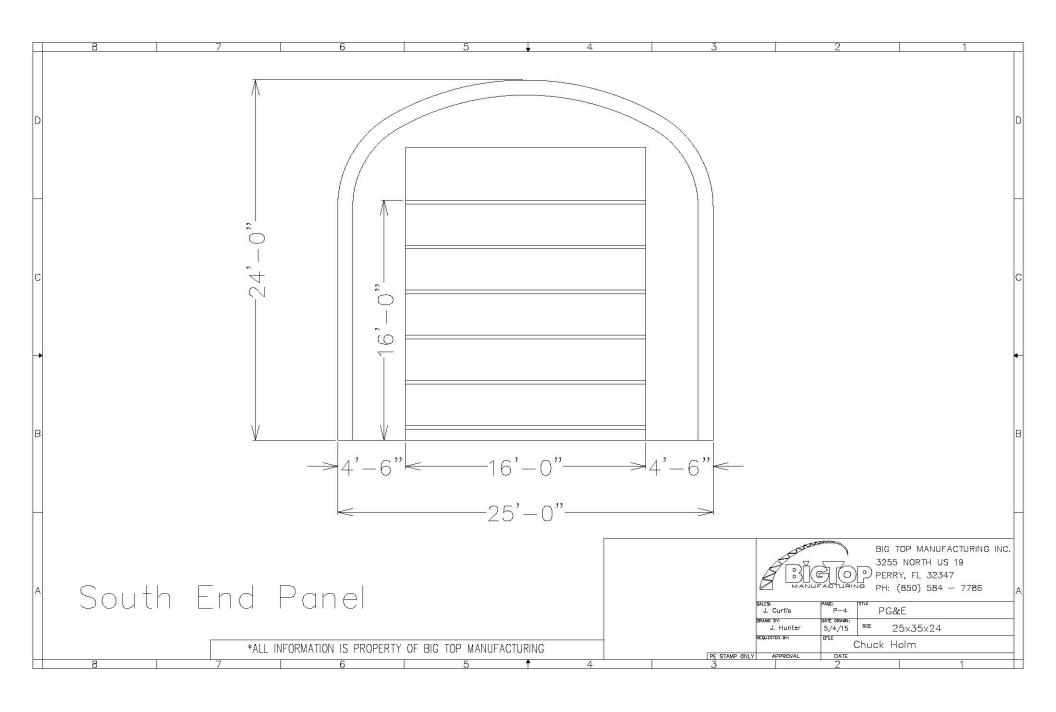
## PG&E Chuck Holm 25x35x24

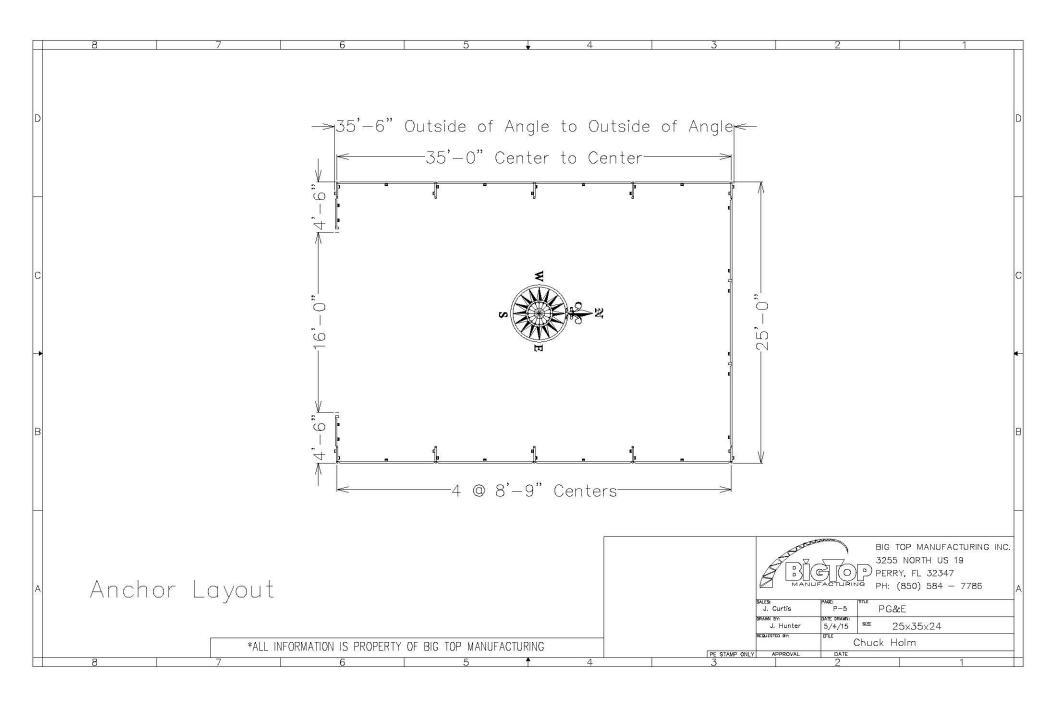
Proposal Drawings 5/4/2015

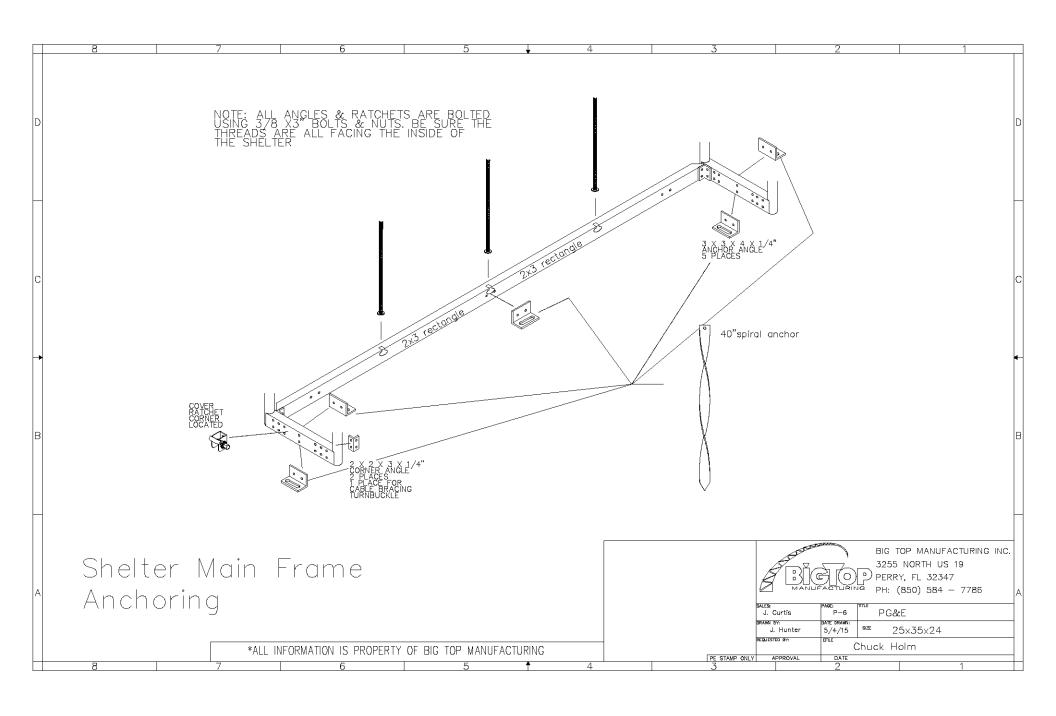












#### **ATTACHMENT 2**

#### Property Owners Within 1,000 Feet of the HBGS Site

APN 305-141-005 Humboldt Bay Harbor Recreational & Conservation District PO Box 1030 Eureka, CA 95502

APN 305-131-013, 016 & 038 Jim & Claire Hoff 3831 Turtle Creek Blvd – 20C Dallas, Tx 75219

APN 305-131-003 North Coast Railroad Authority 419 Talmage Road, Ste M Ukiah, CA 95482

APN 305-131-026 Humboldt Community Services District P.O. Box 158 Cutten, CA 95534