

DOCKETED

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Ms. Mary Dyas
California Energy Commission
Siting and Licensing
1516 Ninth Street
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July 5, 2016

Subject: Comments on Staff's Analysis of the Petition to Amend
Sacramento Power Authority's Campbell Cogeneration Project (93-AFC-3C)

Dear Mary,

On behalf of the Sacramento Power Authority, please find attached our comments on Staff's Analysis of the Petition to Amend, dated June 10, 2016.

Please let me know if you have any questions.

Regards,
CH2M HILL Engineers, Inc.

A handwritten signature in blue ink that reads "John L. Carrier". The signature is written in a cursive, flowing style.

John L. Carrier, J.D.
Program Manager

Encl.

Sacramento Power Authority's Campbell Cogeneration Project
(93-AFC-3C)
Comments on Staff's Analysis on the Petition to Amend

Provided below are the Sacramento Power Authority's Comments on the Staff Analysis on Petition to Amend. For ease of reference, the comments have been placed in the same order as the Staff Analysis and sequentially numbered within each discipline.

General Comment

1. In a few areas of the Staff Analysis, the project description was not updated based on the PTA Addendum (TN# 211559). As stated in the Addendum, the recycled water line will connect to the Regional San main supply line on the west side of the driveway and west of the existing potable water supply lines. The pipeline will be underground except for valves and meters where it connects to the Regional San line. In addition, due to the number of existing pipelines in this part of the plant, two possible pipeline routes were identified. These routes are only approximate and may need to be modified further during construction to avoid existing pipelines. Because of the congestion, the new recycled water line may need to be installed as much as 10 feet deep.

Specific Comments by Discipline

Visual Resources

1. Page 7, Para. 1: See General Comment regarding overhead water line.

Air Quality

1. Page 12, bottom of page. See General Comment above about location of recycled water line.
2. Page 16, Para. 1 (after calculation assumptions). Please correct the typo in sentence 3, from "40 ppmw" to "45 ppmw" to be consistent with SPA's analysis and Staff assumptions just prior to the text.
3. Page 18, Para. 4, Sent. 4: Change "rice straw brining" to "rice straw burning."
4. Page 23, **AQ-1**, proposed text: Change "manufacture's" to "manufacturer's"
5. Page 24, **AQ-3B**, proposed text: Change "air contaminates" to "air contaminants"
6. Page 28, **AQ-CT6**, Verification: SPA cannot comply with a 15-day notification requirement *prior* to SMAQMD's notification of its applicability to the facility. We suggest that the verification language be revised to read, "The facility owner shall notify the CPM within fifteen (15) working days after receipt of notification from SMAQMD of the applicability of this condition."

Geology and Paleontology

1. Page 36, **GEO-3**: Based upon our conversations with CEC Staff, it is our understanding that this condition would apply only when appropriate, as determined during the engineering analysis and design and/or applicable codes and regulations.

Public Health

1. Page 39, Construction Section, first bullet: See General Comment above. Overhead water line has been dropped.

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Soil & Water Resources

1. Page 49, Soil Erosion and Water Quality, para. 1, **SOILS-1**: When initially written for the initial plant construction, SOILS-1 was appropriate. For this smaller construction project, SPA agrees that it will conform to Sacramento County's requirements to minimize soil erosion. The engineers have estimated that excavated soil will be about 260 cubic yards. Based upon our conversations with CEC Staff, it is our understanding that SOIL-1 would apply only when appropriate, as determined during the engineering analysis and design and/or applicable codes and regulations.
2. Pages 49, 50, and 53, **SOILS-4**: Condition SOILS-4 is referenced on these pages and is recommended by staff that the project amendment comply with its requirements. Again, this condition was appropriate for the initial plant construction. However, based upon our conversations with CEC Staff, the Applicant will comply with the requirements of SOILS-4, as appropriate for this size of a project.
3. Page 54, **WATER-7**, Sent. 1: Because the power plant also operates a set of inlet evaporative coolers that will continue to use potable water, please revise the first sentence to provide clarification as follows, "... source for evaporative cooling of the steam cycle in the cooling towers and landscape irrigation."
4. Page 54, **WATER-7**, last 2 sentences: Use of the phrase "in the event of an emergency" is of concern because "emergency" is a charged word that could be overly restrictive and subject to interpretation, even considering that it is defined in the final sentence of the proposed condition. For example, should the recycled water facility be down for scheduled maintenance, potable water would need to be used exclusively. Because is it scheduled and not unexpected, it is not an emergency in the common sense of the word. Also, most upset situations are likely addressed in the condition's preceding sentence. It appears that staff's intention here is to have the facility minimize exclusive use of potable water. SPA proposes the following changes to the language:

"The project may use potable water for backup and blending purposes in cases of interruptions in delivery of the recycled water, and when recycled water quantities or water quality are not sufficient for project use. When possible, rather than the exclusive use of potable water, blended water will be used for backup. Potable water shall not be used exclusively for evaporative cooling unless the source of recycled water is unavailable in the event of an emergency. For purposes of this condition, the term emergency shall mean the inability for SPAC to take or for Regional San to deliver recycled water to the SPAC in a quantity and quality sufficient to meet SPAC's demand due to natural disaster or other circumstances beyond the control of the project owner and it is necessary for SPAC to continue to operate."