

## DOCKETED

<b>Docket Number:</b>	03-AFC-01C
<b>Project Title:</b>	Roseville Energy Park Compliance
<b>TN #:</b>	219887
<b>Document Title:</b>	Petition to Amend the Roseville Energy Park
<b>Description:</b>	N/A
<b>Filer:</b>	Mike Monasmith
<b>Organization:</b>	City of Roseville
<b>Submitter Role:</b>	Public Agency
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<b>Docketed Date:</b>	6/23/2017



**Roseville Electric**  
2090 Hilltop Circle  
Roseville, California 95747

May 11, 2017

Anwar Ali  
Compliance Project Manager  
Siting, Transmission and  
Environmental Protection (STEP Division)  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814

RE: Docket No. 03-AFC-01C: Petition for Staff Approved Modification

Dear Mr. Ali:

On behalf of the Roseville Energy Park ("Project"), the City of Roseville Electric Department ("Roseville Electric" or the "Project Owner") submits this Petition for Staff Approved Modification. The Project Owner requests that California Energy Commission Staff approve the proposed modifications as the modifications: (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 Jamie Johnson at 916-746-1687 or [JJohnson@roseville.ca.us](mailto:JJohnson@roseville.ca.us).

Sincerely,

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Jamie Johnson  
Electric Compliance Analyst  
Roseville Electric

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA**

Application for Certification for the  
ROSEVILLE ENERGY PARK

Docket No. 03-AFC-01C

**PETITION FOR STAFF APPROVED MODIFICATIONS  
ROSEVILLE ENERGY PARK**

Pursuant to Section 1769 of the California Energy Commission’s Siting Regulations, the City of Roseville Electric Department (“Roseville Electric” or the “Project Owner”) hereby submits this petition for a Staff approved modification of the Roseville Energy Park (“Project”).

As set forth below, Staff approval pursuant to Section 1769(a)(2) is appropriate for the following reasons: (a) there is no possibility that the modifications may have a significant effect on the environment; (b) the modifications will not result in a change or deletion of a condition adopted by the commission in the final decision; and (c) the modifications will not cause the project to not comply with any applicable laws, ordinances, regulations, or standards (“LORS”).<sup>1</sup>

**Summary of the Proposed Modifications**

First, Roseville Electric plans to replace an existing ladder and cage access on the belt press structure with a staircase. The staircase would include hand rails and a small concrete landing pad to permit safer and more ergonomic access to the Project’s belt press platform. (See, Attachment 1.) The staircase will improve safe access to difficult-to-reach areas, especially in low light and inclement weather conditions. REP personnel must regularly transport tools, materials and equipment to the areas shown. Improving stairway access will allow for transporting these items in a safer and more ergonomic manner. The stairways will be similar in design, appearance and construction to the adjacent, existing structures, subject to conformance with any and all applicable code and design standards.

Second, to improve access between the two Combustion Turbines (“CTs”), the Project Owner plans to build an extension of the existing catwalk to CT 2, similar to the existing extension on CT2. (See, Attachment 2.) The catwalk extension will allow for safer access to ventilation and air intake packages, and enable authorized personnel to move from one CT to the other without having to descend and ascend two sets of stairs.

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<sup>1</sup> The Project Owner acknowledges that Section 1769(a)(2) requires the Staff to make these three findings independently and provide public notice and opportunity to comment on the Staff’s independent findings.

Third, the Project Owner proposes to convert unpaved and gravel areas within the Project's operating foot print to concrete pads. These five new concrete pads areas shown in Attachment 3. The concrete pads will improve access to difficult-to-reach areas and generally facilitate more efficient project operations. Pad 5 on Attachment 3 will serve as a landing for the proposed stair additions in item 1 above. All pads will be reinforced for strength in order to be utilized in an industrial environment such as supporting forklifts and scaffolding.

No Conditions of Certification are affected by these three sets of modifications. In fact, these small additions to the physical plant and its safe and efficient operations could have very easily been included in the post-Certification, detailed design phase for the Project without need for any modifications to the Certification. Moreover, the additions will all be constructed and utilized in accordance with applicable LORS. All modifications would either require ministerial "over-the-counter" permits from a local government or, more likely, no permits at all, though the Project Owner understands that the Commission wishes to process these as a Staff Approved Modification.

### **The Proposed Modifications Are Categorically Exempt Under CEQA**

The proposed modifications are categorically exempt from the California Environmental Quality Act ("CEQA") pursuant to the following exemptions.

First, the proposed modifications are categorically exempt under Section 15301 of the CEQA Guidelines as Class 1 exemptions:

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. (14 C.C.R. § 15301.)

The stairway, catwalk extension, and concrete pads are minor alterations of the existing Project that involves no expansion of an existing use, and are therefore categorically exempt under Section 15301.

Second, the proposed modifications are categorically exempt under Section 1503 of the CEQA Guidelines as Class 3 exemptions:

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor

modifications are made in the exterior of the structure. (14 C.C.R. § 15303.)

The stairway, catwalk extension and concrete pads meet these requirements, and are therefore categorically exempt under Section 15303.

Third, the conversion of unpaved and gravel areas within the Project's operating foot print to concrete pads are categorically exempt under Section 15304 of the CEQA Guidelines as Class 4 exemptions:

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. (14 C.C.R. § 15304.)

The conversion of unpaved and gravel areas consist of minor alterations in the condition of the Project site which do not involve the removal of healthy, mature scenic trees. Therefore, this proposed modification is categorically exempt under Section 15304.

In short, the applicable categorical CEQA exemptions confirm that there is no possibility that the proposed modifications will result in any significant adverse environmental impacts.

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

The proposed modifications are fully described above and illustrated in Attachments 1 through 3.

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 modifications are necessary and desirable to support ongoing operations by providing for more safe and efficient operations.

**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 modifications are not based upon information that was known during the certification proceeding for the Project.

**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 proposed modifications do not change or undermine 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 modifications are categorically exempt from CEQA as described above. 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 modifications will not affect emissions from the Project, and will support continued safe, reliable and effective operations. No emitting sources are affected and construction impacts will be minor and temporary. The proposed modifications will not have a significant impact to air quality.

**Biological Resources:** The proposed modifications 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 stairway is screened by existing equipment, is low-profile, and cannot be seen from any off-site locations, as shown in Attachment 1. Similarly, the catwalk extension is a minor extension and will blend in with existing infrastructure, as shown in Attachment 2. The concrete pads are at ground level and will not be seen from any offsite locations. The stairway, catwalk extension and concrete pads are all consistent with the general industrial setting of the REP and will not have any potentially significant visual effects.

**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 modifications will not impact the Project's ability to comply with applicable laws, ordinances, regulations, and standards ("LORS").

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

The proposed modifications will not adversely affect the public. The modifications will occur entirely onsite, and will not negatively impact air quality or public health. 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 is required.**

The proposed modifications will have no significant environmental effects and will be in compliance with applicable LORS. Therefore, no property owners will be affected by the modifications.

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

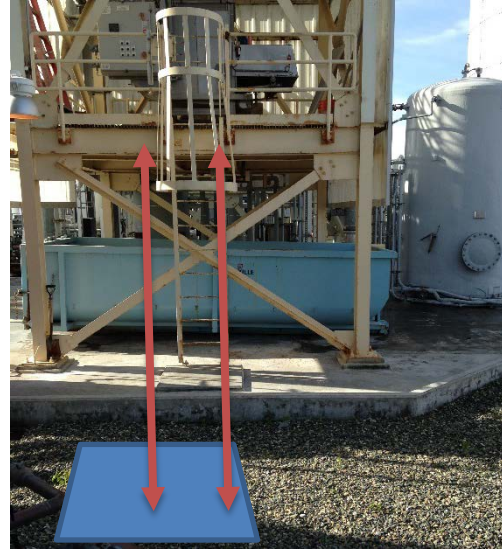
The proposed modifications will benefit the Project Owner by enhancing safe and efficient operation of the Project. The proposed modifications will have no significant environmental effects and will be in compliance with applicable LORS. Therefore, the proposed changes will have no impact on property owners, the public, or any other parties.

**Conclusions**

The stairway, catwalk extension and concrete pads are minor additions that could have been added during post-Certification detailed design, consistent with the Commission's Final Decision. If the Staff determines that it must process these modifications as an amendment, they should be processed as a Staff Approved Modification pursuant to Section 1769(a)(2) of the Commission's regulations.

## Attachment 1

### Stair for Platform Access



- The purpose of this proposed work is to add a staircase to permit safer and more ergonomic access to the belt press platform.
- The new stair will connect to the existing belt press structure at the indicated location; the existing ladder and cage would be removed and handrail at the belt press elevation would be modified to accommodate the width of the proposed stair.



## Attachment 2

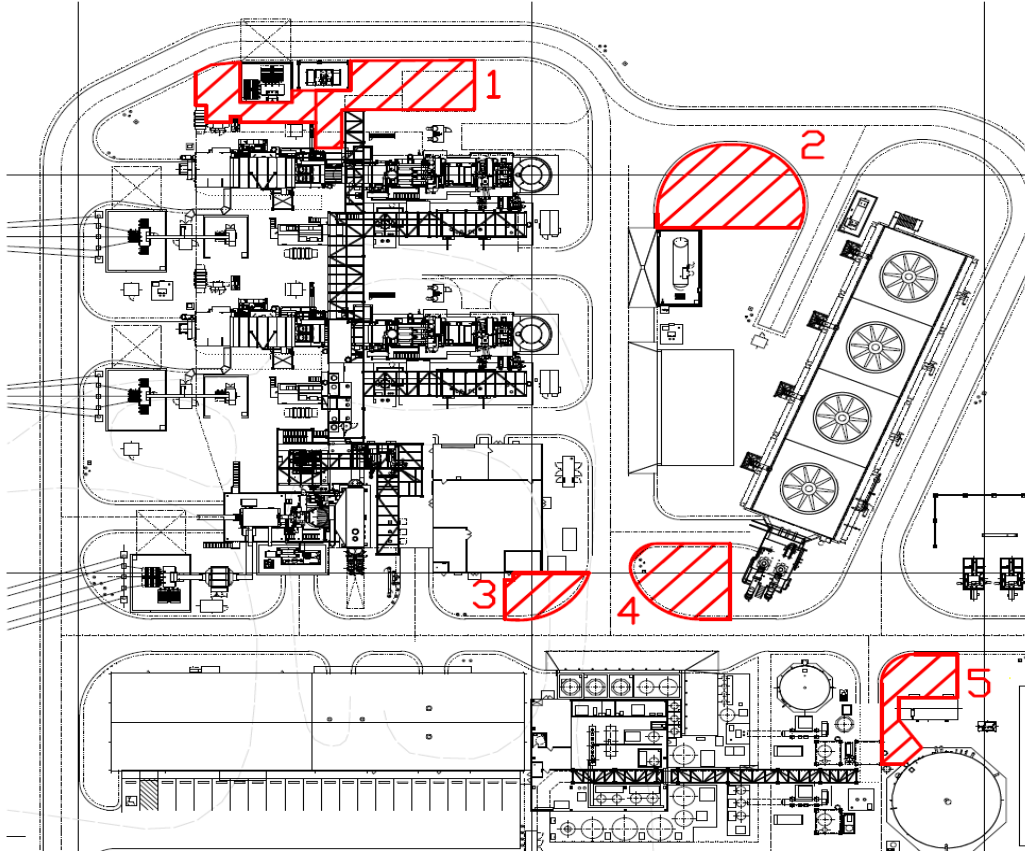
### CT1 Catwalk Extension



- The picture on the left shows an existing connection between the roof of CT2 and the main pipe rack catwalk. This is an example of what's proposed.
- The picture on the right shows the proposed extension of the catwalk to allow access to the roof of CT1. This would allow access similar to CT2.

## Attachment 3

### Attachment 3 – Concrete Additions



1. Concrete pad #1 is approximately 45' X 145'. It is for general access to the CT package, oil drums and air filters using a forklift or hand truck.
2. Concrete pad #2 is approximately 32' X 85'. It will be used for forklift access to scaffold storage and equipment laydown.
3. Concrete pad #3 is approximately 38' X 29'. It will be used as a pad for garbage and cardboard dumpsters.
4. Concrete pad #4 is approximately 47' X 63'. This additional concrete will allow us to reposition the oil shed allowing forklift access to oil drums.
5. Concrete pad #5 is approximately 70' x 17'. This will allow access to fire pump house and belt press structure including stairway pads.
6. General:
  - a. Depth of ground disturbing activities is expected to be no more than 12" below existing grade.
  - b. Assuming all work is done sequentially, modifications will be completed within 45 days of starting, including non-working concrete cure time.
  - c. Total work crew size no more than 10

d. Total crew and delivery truck trips to site 35