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| Project Title: | Compliance - Application for Certification for PG&E Geysers Unit 16 (78-NOI-6) |
| TN #: | 224739 |
| Document Title: | Geysers Power Company LLC Comments on the Staff Analysis of the Petition to Amend |
| Description: | N/A |
| Filer: | Eric Janssen |
| Organization: | Ellison Schneider Harris & Donlan LLP |
| Submitter Role: | Applicant Representative |
| Submission Date: | 9/17/2018 4:37:21 PM |
| Docketed Date: | 9/17/2018 |



September 17, 2018

Keith Winstead
Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Quicksilver (79-AFC-05C)
Socrates (79-AFC-03C)
Grant (82-AFC-01C): Comments on the Staff Analysis of the Petition to Amend-
Permanent Diesel Pump for Cooling Tower Wetting System

Dear Mr. Winstead:

On behalf of the GPC Quicksilver Power Plant (79-AFC-05C; “Quicksilver”), GPC Socrates Power Plant (79-AFC-03C; “Socrates”), and GPC Grant Power Plant (82-AFC-01C; “Grant”) (collectively, the “Geysers Units”), Geysers Power Company, LLC (“Project Owner”) hereby submits these comments on the Staff analysis¹ for the Geysers Units’ *Consolidated Petition for Staff Approved Modifications*.² As explained below, the Project Owner has two primary comments on the Staff analysis: (1) to make the Commission and local district permits consistent, the Commission should adopt a condition that incorporates by reference the approvals issued by the local air district into the facility’s certification and (2) the Commission should adopt the Project Owner’s proposed WORKER SAFETY-1 condition.

I. BACKGROUND

The Project Owner submitted the *Consolidated Petition* on January 23, 2018 seeking Staff approval for the addition of a permanent emergency standby wet down pump diesel drive engine. The wet down pump would provide continued wet down of each facilities’ cooling tower in the event that an approaching wildfire necessitated evacuation of plant personnel from the facility site. The permanent wet down pumps would replace the temporary portable emergency diesel engines currently in use at the Geysers Units. As part of the *Consolidated Petition*, the Project Owner requested that the provisions of the Authority to Construct (“ATC”) for each facility be incorporated into the Commission’s Final Decisions for the various Geysers Units. The Northern Sonoma County Air Pollution Control District (“NSCAPCD”) issued the ATCs for Socrates and Grant. The Lake County Air Quality Management District (“LCAQMD”) issued the ATC for Quicksilver.

¹ The Staff analysis was filed separately in each of the three instant dockets as follows: Quicksilver (79-AFC-05C) – TN# 224576; Socrates (79-AFC-03C) – TN# 224577; Grant (82-AFC-01C) – TN#: 224578.

² TN# 222333 (79-AFC-05C), TN# 222334 (79-AFC-03C), TN#: 222335 (82-AFC-01C).

II. COMMENTS ON STAFF'S AIR QUALITY ANALYSIS

The Project Owner does not have specific comments on Staff's Air Quality analysis, but notes that a global correction is needed in the "Analysis" section for each Geysers Unit. Staff's analysis states that the emergency standby wet-down pumps are "proposed to provide emergency suppression water pumping" for the respective Geysers Units.³ This is incorrect. As otherwise noted throughout Staff's analysis and as described in the *Consolidated Petition*, the wet-down pump will support the cooling wet down systems, which are intended to be preventative fire measures, rather than act as a fire suppression system.

With respect to Staff's proposed Air Quality conditions of certification, the Project Owner has the following concerns. First, the Project Owner is concerned that Staff proposes new Air Quality Conditions of Certification that are not the subject of or related to the modification proposed in the *Consolidated Petition*, and are not required by any law, ordinance, regulation, or standard, or to mitigate any potential environmental impacts. Notwithstanding this concern, because the modifications proposed in the *Consolidated Petition* are vital to the Geysers Units, the Project Owner does not object to Staff's proposed conditions AQ-SC1 through AQ-SC3 for the Geysers Units. However, the Project Owner recommends revisions to clarify the reporting requirements. These recommended revisions are set forth in Attachment A to these comments. Second, the Project Owner is concerned that in some cases, Staff's proposed Conditions of Certification change language contained in the local air district's permit. The Project Owner is also concerned that the proposed language changes are confusing, and would make compliance more difficult. The Project Owner objects to all of Staff's recommended conditions of certification that are intended to incorporate the provisions of the local air district permit. The Project Owner recommends that instead of making changes to the local air district's condition language for the purposes of inclusion into the Commission's Final Decision, the Commission should instead adopt a condition that incorporates by reference all provisions of the local air district's permit. This would be far more efficient, and less of an administrative burden to manage current and future compliance. Therefore, the Project Owner objects to Staff's proposed conditions of certification, as drafted, and recommends that the Commission instead adopt the Project Owner's proposed revisions to AQ-SC1, which is set forth in Attachment A to these comments.

With respect to Staff's proposal to delete obsolete Air Quality conditions of certification and provisions from the certifications for each Geysers Unit, the Project Owner agrees with this proposal and recommends that the Commission approve the removal of all existing Air Quality conditions. Adoption of the Project Owner's proposed Air Quality conditions of certification, as set forth in Attachment A, and removal of obsolete conditions will benefit all parties by streamlining compliance.

³ See, Staff's Analysis, pp. 9, 46, 124.

III. COMMENTS ON STAFF'S WORKER SAFETY ANALYSIS

The Project Owner has the following comments with respect to Staff's Worker Safety Analysis. Each of the Geysers Units were designed and constructed in accordance with the laws, ordinances, regulations, and standards ("LORS") in effect at the time the Application for Certifications were approved. For Quicksilver and Socrates, the Commission's Final Decisions provided for application of the 1976 Uniform Building Code, with certain exceptions. For Grant, the Commission's Final Decision provided for application of the 1982 Uniform Building Code. The Final Decisions for the Geysers Units also contained specific provisions relating to the design of the cooling tower wet-down system, which required the project owners to propose a specific design for the cooling towers, within specific parameters, for approval by the Commission. The existing cooling tower wet-down system for each facility was approved by the Commission, including, for example, approval of like-kind replacement of the existing systems at Grant, Quicksilver, and Socrates in 2015.⁴

The Project Owner is in the process of assessing the fire protection systems for the Geysers Units. The proposed WORKER SAFETY-1 pre-determines the outcome of the analysis that is in the process of being performed. The Project Owner is not opposed to modification of the existing Commission-approved system as proposed in WORKER SAFETY-1, if in fact the analysis determines that to be the best course of action. However, any potential changes to the fire protection system should not be constrained in advance by a required physical change before the assessment is completed. The Project Owner recommends that Staff's proposed condition of certification WORKER SAFETY-1 be revised to provide for completion of the fire protection system assessment before any changes are made to the design of the cooling tower wet-down system. The Project Owner does not object to Staff's proposed WORKER SAFETY-2.

IV. CONCLUSION

The Project Owner recommends that the Commission adopt the conditions of certification proposed in Attachment A.

Dated: September 17, 2018

Respectfully submitted,

/s/

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⁴ TN#: 207191, 210233, 206736.

Quicksilver (79-AFC-05C), Socrates (79-AFC-03C), Grant (82-AFC-01C)
Comments on the *Staff Analysis of the Petition to Amend- Permanent Diesel Pump for
Cooling Tower Wetting System*

ATTACHMENT A

Quicksilver Geothermal (PG&E Geysers 16)
(79-AFC-05)

[Note: Staff's proposed Conditions of Certification are set forth below. The Project Owner's proposed additions are shown in double underlined font and highlighted. Proposed deletions are shown in ~~strikethrough~~ font and highlighted.]

AQ-SC1 The project owner shall comply with the terms and conditions set forth in the project air permit(s) issued by the Lake County Air Quality Management District- (LCAQMD or District) to the facility. The project owner shall provide the compliance project manager (CPM) copies of any Lake County Air Quality Management District- (LCAQMD or District) issued project air permit for the facility. The project owner shall submit any request or application for a new project air permit or project air permit modification to the CPM.

Verification: The project owner shall submit any request or application for a new project air permit or project air permit modification to the CPM at the time of its submittal to the permitting agency. The project owner shall provide the CPM a copy of all newly issued air permits, including all modified air permits, to the CPM within 30 days of finalization. Copies of permit renewals where permit provisions have not changed do not need to be resubmitted to the CPM.

AQ-SC2 The project owner shall provide the CPM with copies or summaries of the quarterly ~~and annual~~ compliance reports submitted to the District ~~or ARB~~. The project owner shall submit to the CPM in the required quarterly reports a summary of any notices of violation and reports, and complaints relating to the project.

Verification: The project owner shall provide the reports to the CPM ~~within the timeframes required in the conditions of certification.~~ at the time of its submittal to the District or a later date as approved by the CPM.

AQ-SC3 The project owner shall provide the CPM with an Annual Compliance Report demonstrating compliance with all the conditions of certification as required in the General Provisions of the Compliance Plan for the facility.

Verification: The project owner shall provide the Annual Compliance Report to the CPM within 45 calendar days after the end of the reporting period or a later date as approved by the CPM.

WORKER SAFETY-1 The project owner shall evaluate the interconnection of the cooling tower wet-down system and the facility's fire protection system. If needed to safeguard the effectiveness of the facility's fire protection system,

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The project owner shall physically disconnect the piping connection between the cooling tower wet-down system and the plant's fire protection system.

Verification: Upon completion of the project owner's evaluation of the fire protection system and cooling tower wet-down system, the project owner will notify the CPM if physical disconnection is required. If required, the project owner shall complete the physical disconnection of the cooling tower wet-down system from the plant's fire protection system no later than January 1, 2019 or a later date if agreed upon by the CPM. The CPM shall be notified at least 30 days prior to the current disconnection date, if the project owner wishes to seek an extension to the current disconnection date. The project owner shall submit a letter stating that the physical disconnection has occurred and provide the final DCBO approved design drawings along with photographs showing the implementation no later than 30 days after the disconnection.

Quicksilver (79-AFC-05C), Socrates (79-AFC-03C), Grant (82-AFC-01C)
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Socrates Geothermal (PG&E Geysers 18)
(79-AFC-03C)

[Note: Staff's proposed Conditions of Certification are set forth below. The Project Owner's proposed additions are shown in double underlined font and **highlighted**. Proposed deletions are shown in ~~strike through~~ font and **highlighted**.]

AQ-SC1 The project owner shall comply with the terms and conditions set forth in the project air permit(s) issued by the Northern Sonoma County Air Pollution Control District (NSCAPCD or District) to the facility. The project owner shall provide the compliance project manager (CPM) copies of any **Northern Sonoma County Air Pollution Control District (NSCAPCD or District)** issued project air permit for the facility. The project owner shall submit any request or application for a new project air permit or project air permit modification to the CPM.

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Grant Geothermal (PG&E Geysers 20)
(82-AFC-01C)

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