

DOCKETED

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CALIFORNIA ENERGY COMMISSION

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CEC-57 (Revised 1/19)



STATEMENT OF STAFF APPROVAL OF PROPOSED CHANGE CAMPBELL COGENERATION PROJECT (93-AFC-03C)

On April 30, 2020, the Sacramento Power Authority (SPA) filed a post-certification petition with the California Energy Commission (CEC) for the Campbell Cogeneration Project (SPAC). The nominal 158-megawatt (MW) cogeneration project was certified by the CEC in November 1994, and began commercial operation in October 1997. The facility is located in Sacramento County at 3215 47th Avenue, east of the corner of 47th Avenue and Franklin Boulevard, approximately 1 mile west of Highway 99.

DESCRIPTION OF PROPOSED CHANGE

SPA's request includes the following changes to the project:

- Repurposing an existing water storage tank to be used for fire suppression; and
- Installing a new fire water pump, housing, and piping to connect them to each other and to the water supply system to eliminate the potential for backflow into the potable water system.

The petition is available on the CEC's project webpage at [Campbell Cogeneration Project](#).

ENERGY COMMISSION STAFF REVIEW AND CONCLUSIONS

Title 20, California Code of Regulations, section 1769 states that a project owner shall petition the commission for approval of any change it proposes to the project design, operation, or performance requirements.

CEC technical staff reviewed the petition for potential environmental effects and consistency with applicable laws, ordinances, regulations, and standards (LORS). Staff has determined that the technical or environmental areas of Efficiency, Geological and Paleontological Resources, Land Use, Public Health, Reliability, Soil and Water Resources, Transmission Line Safety and Nuisance, Transmission System Engineering, Visual Resources, and Waste Management, are not affected by the proposed changes.

For the technical or environmental areas of Air Quality, Biological Resources, Cultural Resources, Facility Design, Hazardous Materials Management, Noise, Socioeconomics, Traffic and Transportation, Visual Resources, and Worker Safety and Fire Protection,

staff has determined the project would continue to comply with applicable LORS, and the project changes would not result in any significant adverse environmental impacts or require a change to any conditions of certification.

Staff notes the following for these technical areas affected by the proposed change:

- **Air Quality.** The proposed change would have a less than significant impact on air quality and greenhouse gases. No ground disturbance would be required for either material storage or worker parking. The project would remain in compliance with all applicable LORS and impacts that may result from the project change would be less than significant with the implementation of Condition of Certification AQ-SC6 in the Campbell Cogeneration Project Commission Decision (Commission Decision, 1994). This condition requires the project owner to comply with several fugitive dust mitigation measures as part of subparts (a) through (g) which would ensure impacts on air quality would be less than significant. Existing conditions of certification are sufficient to cover the proposed change without the need for new or modified conditions of certification.
- **Biological Resources.** The suction and discharge lines would require minor excavations for the footings within paved areas of the project site. The proposed work would occur within the developed site and would not disturb any habitat or vegetation. In addition, the repurposing of the water storage tank would not affect Biological Resources or require any changes to the existing Biological Resources conditions of certification.
- **Cultural Resources.** There are no known cultural resources on the project site that could be impacted by the proposed project changes. Several archaeological discoveries occurred during the construction of the original project; none of these cultural resources were considered eligible for any historical registers. In the event that cultural resources might be encountered during the construction of the fire water supply line and related facilities, implementation of Conditions of Certification CUL-1, CUL-2, and CUL-3 in the Commission Decision would mitigate any potentially significant impacts during construction and the treatment of any discovered resources would be in conformance with the County of Sacramento's General Plan Conservation Element. While state and local LORS have been updated since the Commission Decision in 1994, the project would remain in compliance with LORS as they pertain to Cultural Resources. No changes to conditions of certification are required for this project change.

Conditions of Certification CUL-1, CUL-2, and CUL-3, applicable to this proposed project change, were developed to ensure that, if cultural resources are

encountered during construction, adequate measures are in place to mitigate any project-level impacts to less than significant.

- **Facility Design.** The water storage tank enhancements which include the repurpose of the existing water tank, installation of water connections, and installations of new fire water pumps within the existing SPAC site, must be in accordance with the 2019 edition of the California Building Code. Implementation of the existing Facility Design conditions of certification adopted in the Commission Decision and construction compliance oversight by the CEC's delegate chief building official would ensure this compliance.
- **Hazardous Materials Management.** The conversion of the existing 100,000-gallon condensate tank to a fire water storage tank holding potable water, and installation of a new electric fire water pump, would not have a significant impact on the facility's hazardous materials management.
- **Noise and Vibration.** Construction associated with this petition would be temporary and would occur during the daytime hours, which would be consistent with the local ordinance. Any noise generated during these activities would result in a less-than-significant impact with implementation of the existing Noise conditions of certification in the Commission Decision.

The water tank and water connections do not generate noise when in use. The fire water pumps would be used in the event of an emergency; moreover, the rate of such an occurrence would be very low, and thus the changes in this petition would create a less-than-significant noise impact. Furthermore, the project would continue to meet operational noise requirements established in the Commission Decision.

- **Socioeconomics.** The proposed change would repurpose an existing condensate tank as a water/fire water storage tank and replace the electric fire water pump. The installation of the new electric fire water pump would require up to approximately 14 workers and take approximately 12 workdays to complete. From a socioeconomics standpoint, the proposed change would have insignificant workforce-related impacts on housing and community services.
- **Traffic and Transportation.** Impacts to the transportation system from the installation of the fire water pump system would be less than significant. Installation of the new fire water pump system would generate up to approximately 17 daily roundtrip vehicle trips (14 workers and 3 construction equipment vehicles) over the approximately 12-day construction period. Construction traffic would be minimal and temporary, and there would be no

added traffic from the operation of the system. All construction activities would occur on-site and would not obstruct any part of the transportation network. Impacts would remain less than significant with implementation of Condition of Certification TRANS-1, which requires that the necessary transportation permits from cities, counties, and Caltrans be obtained.

- **Worker Safety.** During the proposed modifications to the existing 100,000-gallon condensate tank and installation of new electric fire water pump, several hazardous materials would be used onsite. Like materials used for equipment maintenance activities, these materials would include gasoline, solvents, lubricants, paint, and welding gases. Existing Condition of Certification SAFETY-1, which covers worker health and safety requirements, would ensure the safe and appropriate usage of the hazardous materials used for the proposed project changes. In addition, because of the low volumes to be used, they would not present a significant impact to workers or the offsite public. No extremely hazardous or regulated hazardous materials would be used on site specifically for the modification of the existing 100,000-gallon condensate tank and installation of the new electric fire water pump.

Therefore, with the project owner's continued compliance with existing condition of certification SAFETY-1, the proposed change would not have a significant impact on the offsite public or the environment and the project would continue to comply with all applicable LORS.

Staff's conclusions for each technical or environmental area are summarized in the table below.

SUMMARY OF STAFF RESPONSES TO PETITION

TECHNICAL and ENVIRONMENTAL AREAS REVIEWED	Technical Area Not Affected	CEQA			Conforms with Applicable LORS	Revised Conditions of Certification Recommended
		Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact		
Air Quality				X	X	
Biological Resources				X	X	
Cultural Resources				X	X	
Efficiency	X					
Facility Design				X	X	
Geological and Paleontological Resources	X					
Hazardous Materials Management				X	X	
Land Use	X					
Noise and Vibration				X	X	
Public Health	X					
Reliability	X					
Socioeconomics				X	X	
Soil and Water Resources	X					
Traffic and Transportation				X	X	
Transmission Line Safety and Nuisance	X					
Transmission System Engineering	X					
Visual Resources	X					
Waste Management	X					
Worker Safety and Fire Protection				X	X	

ENVIRONMENTAL JUSTICE

Environmental Justice – Figure 1 shows 2010 census blocks in the six-mile radius of the Campbell Cogeneration Project with a minority population greater than or equal to 50 percent. The population in these census blocks represents an environmental justice (EJ) population based on race and ethnicity as defined in the United States

Environmental Protection Agency's *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. Staff conservatively obtains demographic data within a six-mile radius around a project site based on the parameters for dispersion modeling used in staff's air quality analysis. Air quality impacts are generally the type of project impacts that extend the furthest from a project site. Beyond a six-mile radius, air emissions have either settled out of the air column or mixed with surrounding air to the extent the potential impacts are less than significant. The area of potential impacts would not extend this far from the project site for most other technical areas included in staff's EJ analysis.

Based on California Department of Education data in the **Environmental Justice – Table 1**, staff concluded that the percentage of those living in the Sacramento City Unified and Washington Unified school districts (in a six-mile radius of the project site) and enrolled in the free or reduced price meal program, is larger than those in the reference geography, and thus are considered an EJ population based on low income as defined in *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. **Environmental Justice – Figure 2** shows where the boundaries of the school districts are in relation to the six-mile radius around the Campbell Cogeneration Project site.

TABLE 1 - LOW INCOME DATA WITHIN THE PROJECT AREA

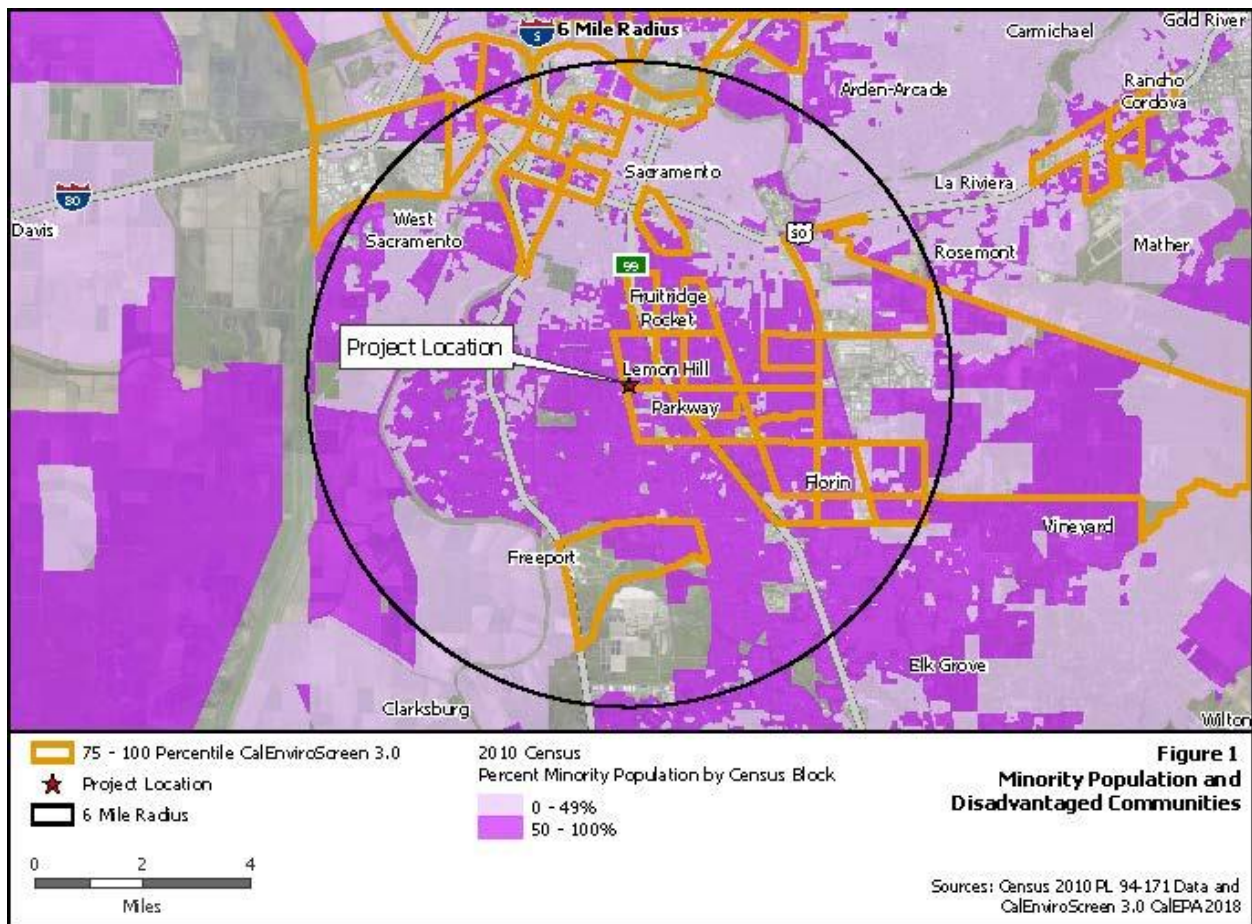
SACRAMENTO COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Elk Grove Unified	63,297	34,104	53.9%
Sacramento City Unified	46,595	32,513	69.8%
REFERENCE GEOGRAPHY			
Sacramento County	245,910	148,221	60.3%
YOLO COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Washington Unified	8,281	5,422	65.5%
REFERENCE GEOGRAPHY			
Yolo County	30,067	15,754	52.4%

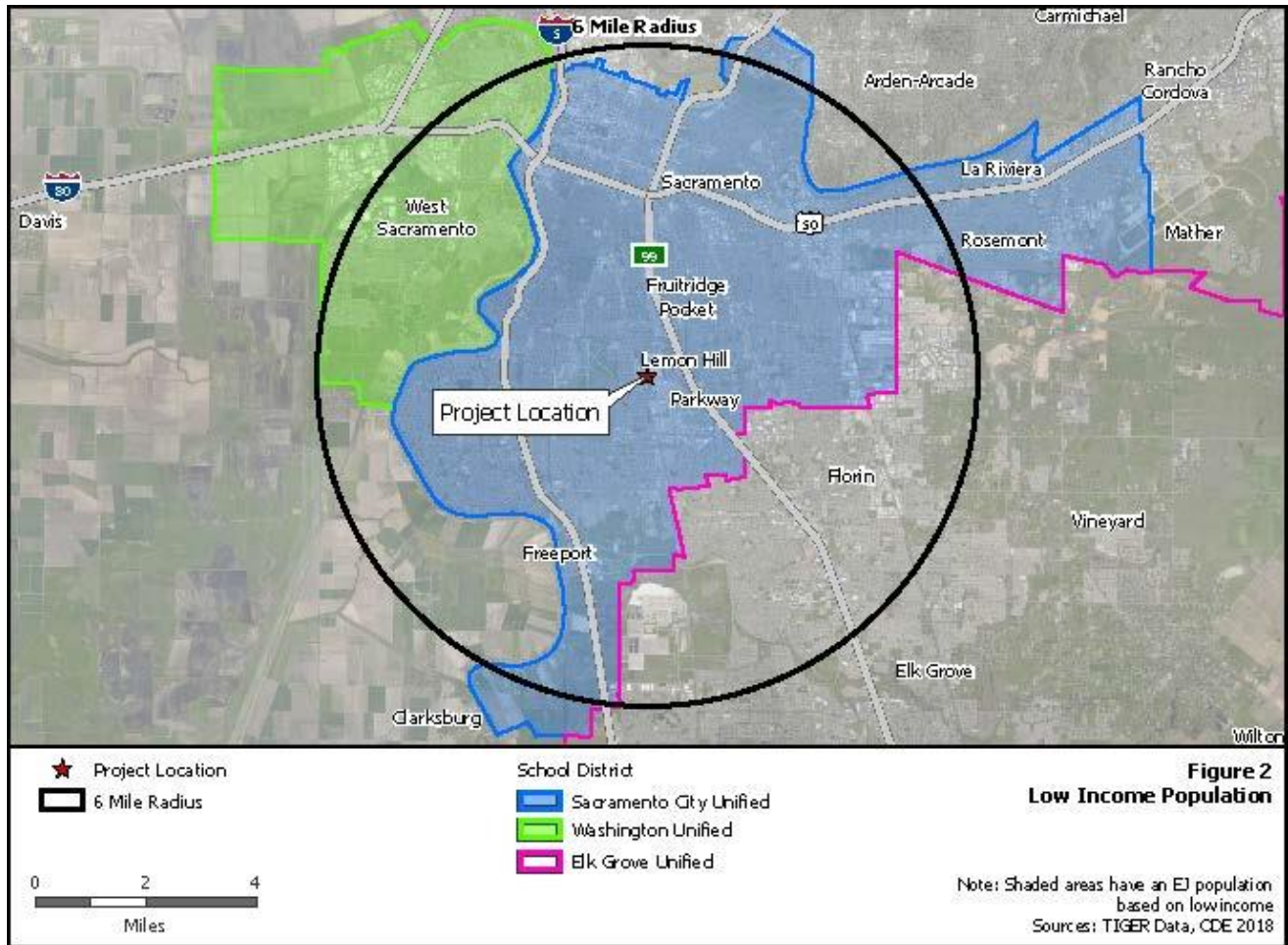
Source: CDE 2018. California Department of Education, DataQuest, Free or Reduced Price Meals, District level data for the year 2017-2018, <<http://dq.cde.ca.gov/dataquest/>>.

The following technical areas (if affected) consider impacts to EJ populations: Air Quality, Cultural Resources (indigenous people), Hazardous Materials Management, Land Use, Noise and Vibration, Public Health, Socioeconomics, Soil and Water Resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Visual Resources, Waste Management, and Worker Safety and Fire Protection.

Environmental Justice Conclusions

For the technical areas that address EJ and which are affected by the proposed project changes – Air Quality, Cultural Resources, Hazardous Materials Management, Noise and Vibration, Socioeconomics, Traffic and Transportation, and Worker Safety and Fire Protection – staff concludes that impacts would be less than significant, and thus would be less than significant on the EJ population represented in **Environmental Justice – Figure 1, Figure 2, and Table 1.**





ENERGY COMMISSION STAFF DETERMINATION

Pursuant to Title 20, California Code of Regulations, section 1769(a)(3)(A), CEC staff has determined for this petition that approval by the Commission at a noticed business meeting or hearing is not required and the proposed changes meet the criteria for approval by staff because:

- i. there is no possibility that the change may have a significant impact on the environment;
- ii. the change would not cause the project to fail to comply with any applicable laws, ordinances, regulations, or standards; and
- iii. the change will not require a change to, or deletion of, a condition of certification adopted by the Commission in the final decision or subsequent amendments.

Staff also concludes that the proposed changes do not meet the criteria requiring production of subsequent or supplemental review as specified in the California Environmental Quality Act (CEQA) Guidelines, Title 14, California Code of Regulations, sections 15162(a).

WRITTEN COMMENTS

This Statement of Staff Approval of the proposed project changes has been filed in the docket for this project. Pursuant to section 1769(a)(3)(C), any person may file an objection to staff's determination within 14 days of the filing of this statement on the grounds that the project change does not meet the criteria set forth in sections 1769(a)(3)(A). Absent any objections as specified in 1769(a)(3)(C), this petition will be approved 14 days after this statement is filed.

Written comments or objections to staff's determination may be submitted using the CEC's e-Commenting feature, as follows: Go to the CEC's project webpage and click on either the "[Comment on this Proceeding](#)," or "Submit e-Comment" link. When your comments are filed, you will receive an email with a link to them.

Written comments or objections may also be mailed to:

California Energy Commission
Docket Unit, MS-4
Docket No. 93-AFC-03C
1516 Ninth Street
Sacramento, CA 95814-5512

All comments and materials filed with the Docket Unit will be added to the facility Docket Log and will be publicly accessible on the CEC's webpage for the facility.

If you have questions about this notice, please contact Chris Davis, Compliance Office Manager, at (916) 654-4842, or via e-mail at: chris.davis@energy.ca.gov.

For information on public participation, please contact the Public Advisor, at (916) 654-4489 or (800) 822-6228 (toll-free in California) or send your e-mail to publicadvisor@energy.ca.gov.

News media inquiries should be directed to the CEC Media Office at (916) 654-4989, or by e-mail at mediaoffice@energy.ca.gov.

List Serve: Campbell