

**DOCKET**79-AFC-4C

DATE DEC 14 2006

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December 14, 2006

JOHN A. MCKINSEY Direct (916) 319-4746 jamckinsey@stoel.com

### BY E-MAIL AND HAND DELIVERY

Mr. Christopher Meyer Compliance Project Manger California Energy Commission 1516 Ninth Street, MS-Sacramento, CA 95814

Re: Bottle Rock Power Plant (79-AFC-4C)

Compliance Submittal - Condition of Certification 10-5

Dear Mr. Meyer:

Dear Mr. Meyer:

On December 13, 2006, at the regularly scheduled Business Meeting for the California Energy Commission ("CEC"), the Commission unanimously approved Bottle Rock Power, LLC's ("BRP") Petition to Re-Start the Bottle Rock Power Plant ("BRPP"). To that end, compliance activities related to BRPP's re-start have begun. BRP addresses these activities herein.

Condition of Certification ("COC") 10-5, related to *Structural Engineering*, requires the project owner to file with the CEC Compliance Project Manager ("CPM") substantial design changes to the final plans as required by CBSC 2001. "Substantial changes" are defined to include "all changes requiring an alteration in design concept and preparation of new design plans consistent with the [Application for Certification] conditions of certification..." Therefore, the following changes are considered "substantial" pursuant to COC 10-5. As such, BRP submits the enclosed detailed information in compliance with COC 10-5 regarding the following:

- Installation of vacuum pumps to maintain vacuum in the condenser versus reliance upon steam injectors;
- Installation of a distributive control system for the plant;
- Addition of mercury vapor filter system upstream of the Stretford H<sub>2</sub>S abatement system;
- Addition of air spargers in the oxidizer tanks of the Stretford H<sub>2</sub>S abatement system; and,
- Changes to the design and operation of the secondary H<sub>2</sub>S abatement system.

Oregon Washington California Utah



Mr. Christopher Meyer December 14, 2006 Page 2

Should you have any questions or require additional information regarding these documents, please do not hesitate to contact me at the above number.

Very truly yours,

John A. McKinsey J

Enclosures.

cc: Ronald E. Suess, JD, President, Bottle Rock Power, LLC

### BOTTLE ROCK POWER CORPORATION (BRPC) VACUUM PUMP INSTALLATION

BRPC is recommending that two 50% capacity vacuum pumps be installed at the facility to assist in the removal of non-condensable gas (NCG). The current NCG removal system is two stages of ejectors. The existing ejector system will be rebuilt and will remain fully functional and serve as a backup system to the proposed vacuum pumps. The seal water from the vacuum pumps will be returned to either the hot-well or to the rich condensate system (both options are currently piped and available). Vacuums pumps are slightly more energy efficient than the ejectors but the main advantages to the plant are as follows:

- > The use of vacuum pumps will significantly reduce (almost eliminate) the need to vent unabated steam or NCG's during a plant start. Vacuum can be pulled with the pumps and then the steam line warmed up through the turbine bypass directly to the condenser.
- > The vacuum pumps will forward the NCG stream to the Stretford Process at a higher pressure. This will reduce back pressure shut downs and problems caused by minor restrictions (plugging) in the Stretford.

> Vacuum pumps produce less ambient noise than ejectors.

Please see attached drawing showing pumps installed with existing ejectors.

# **BOTTLE ROCK POWER CORPORATION**

COBB, CALIFORNIA

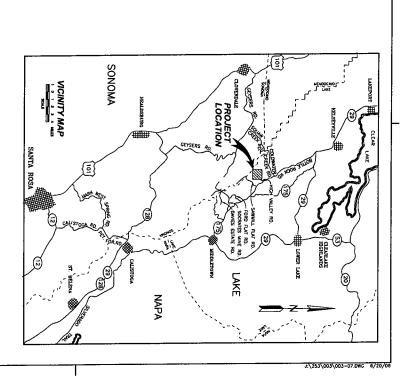
## **CONTRACT DRAWINGS**

FOR CONSTRUCTION OF

# VACUUM PUMP INSTALLATION

LAKE COUNTY, CALIFORNIA

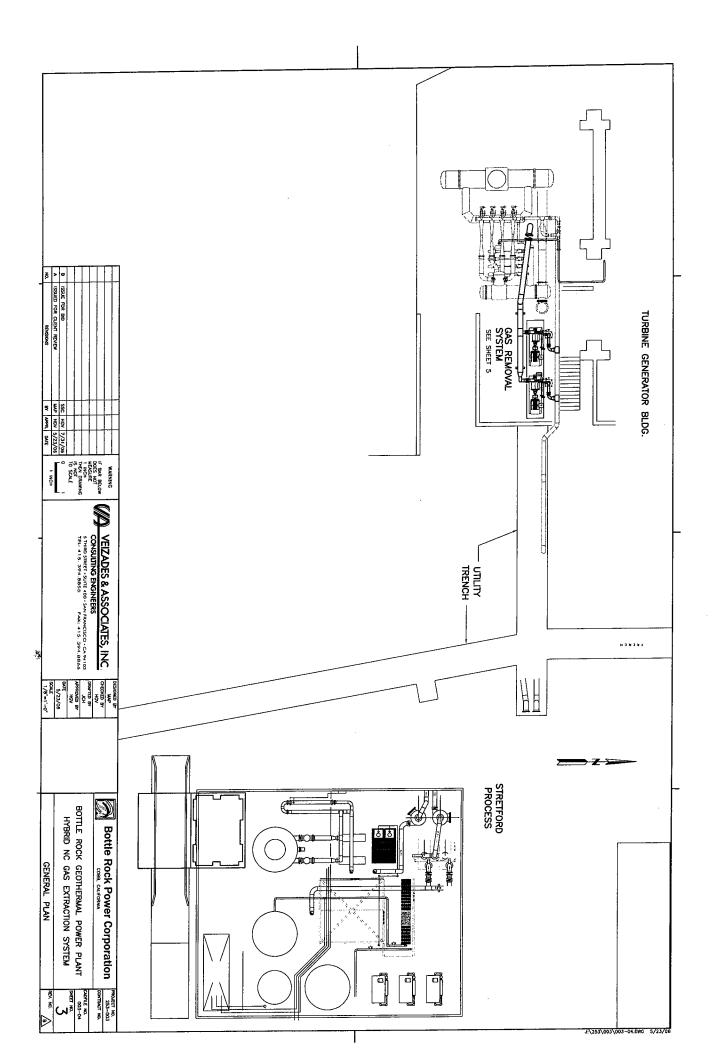
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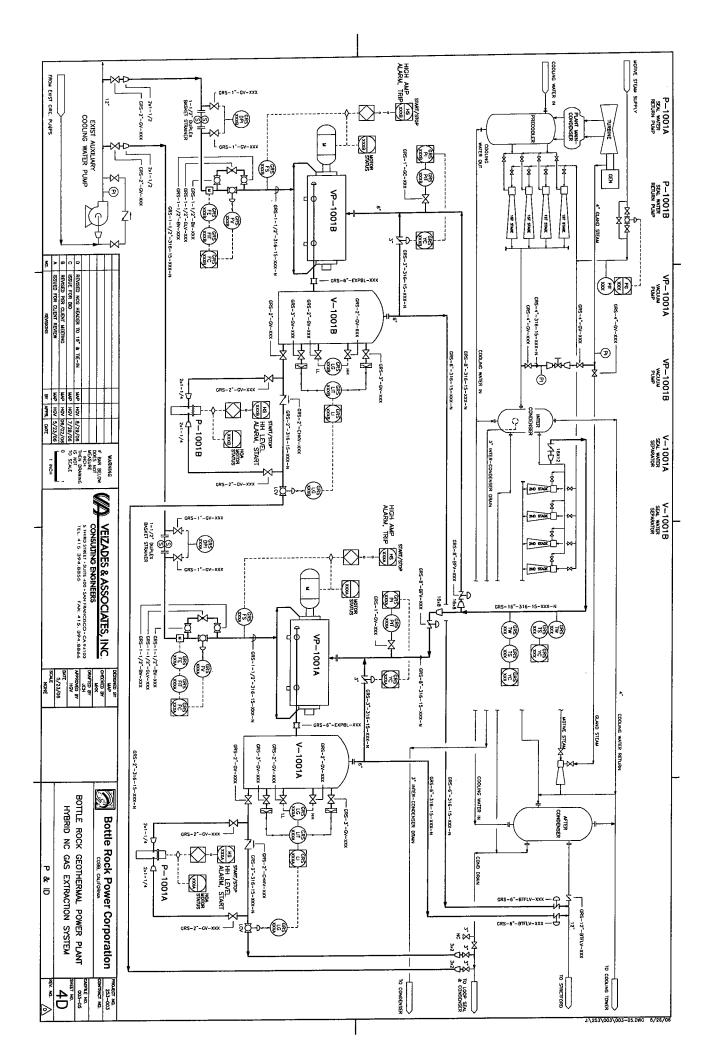


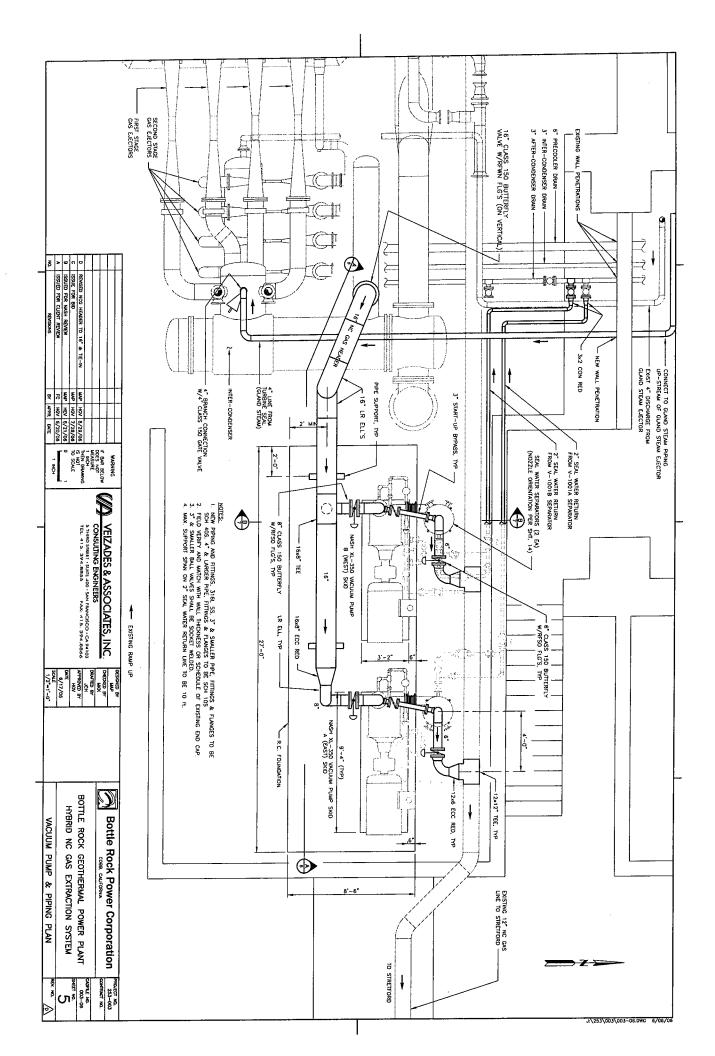
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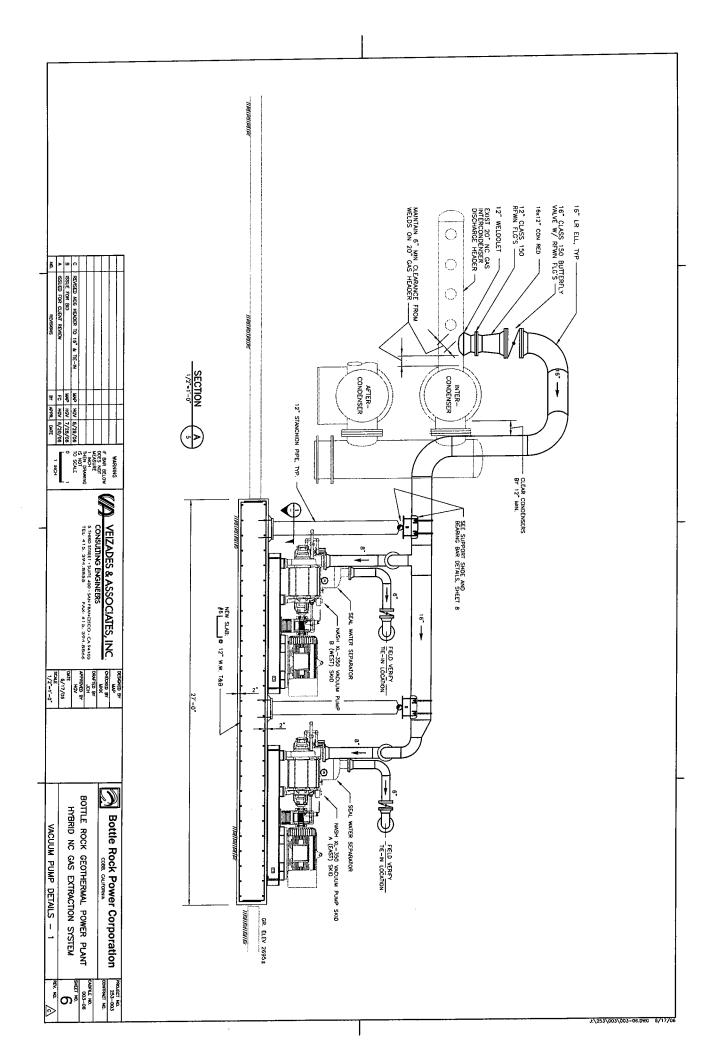
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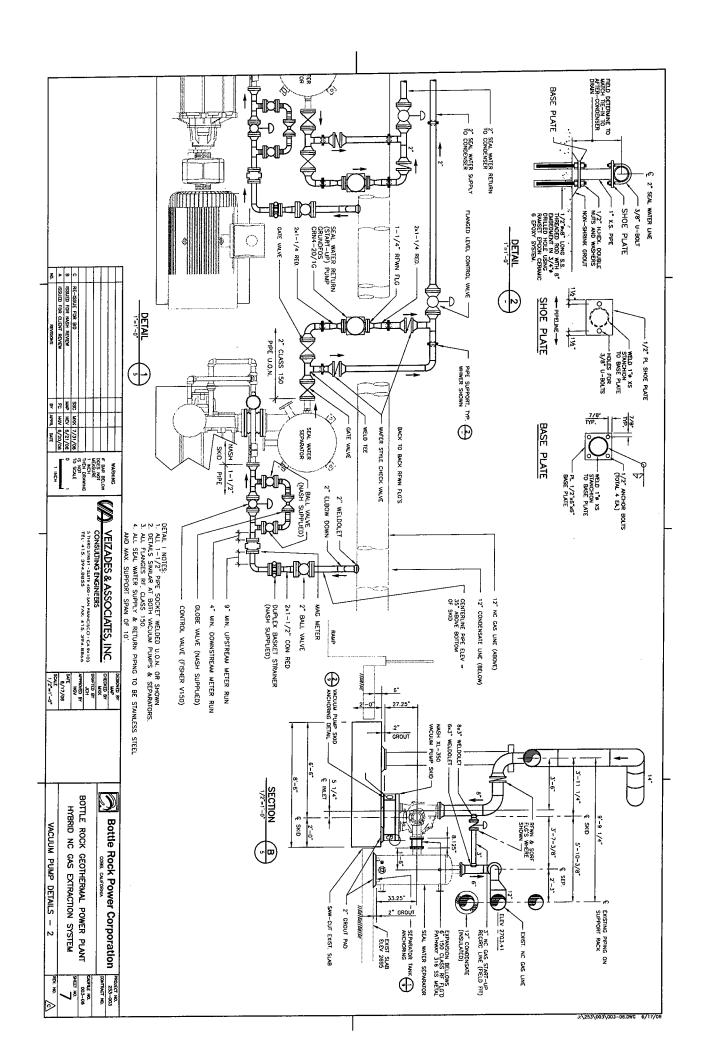
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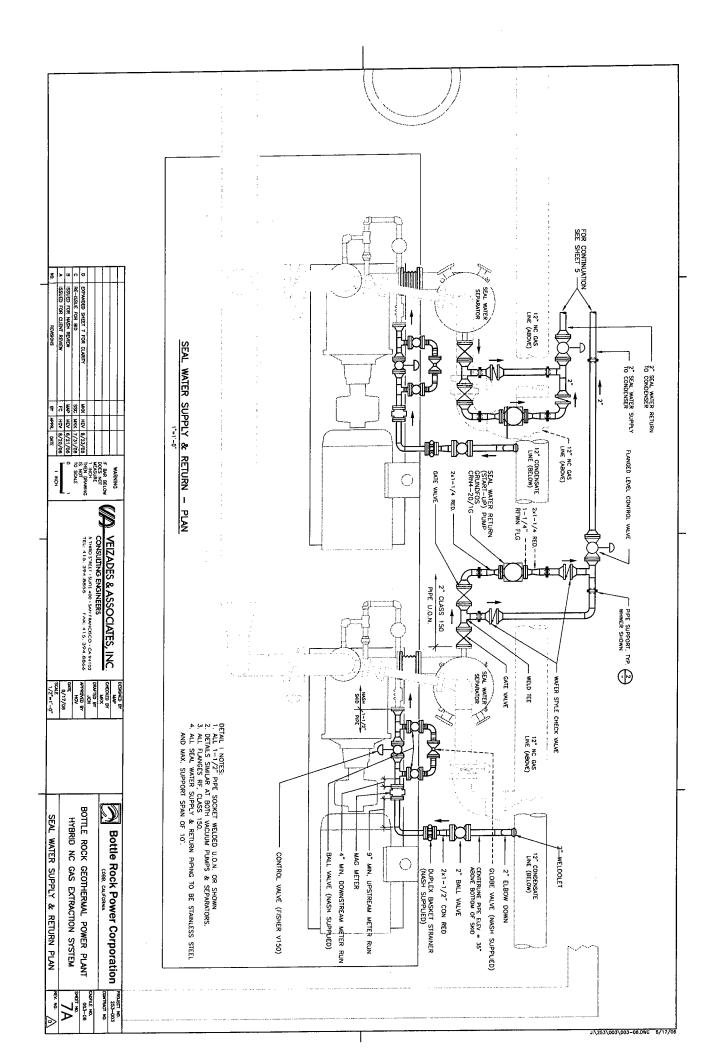


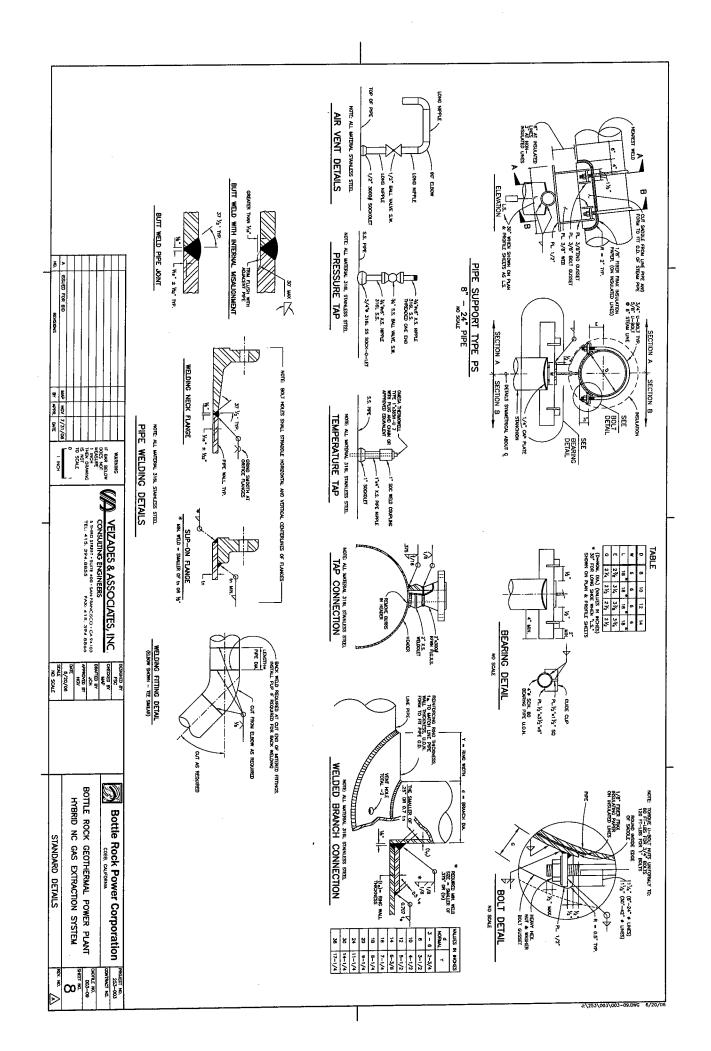


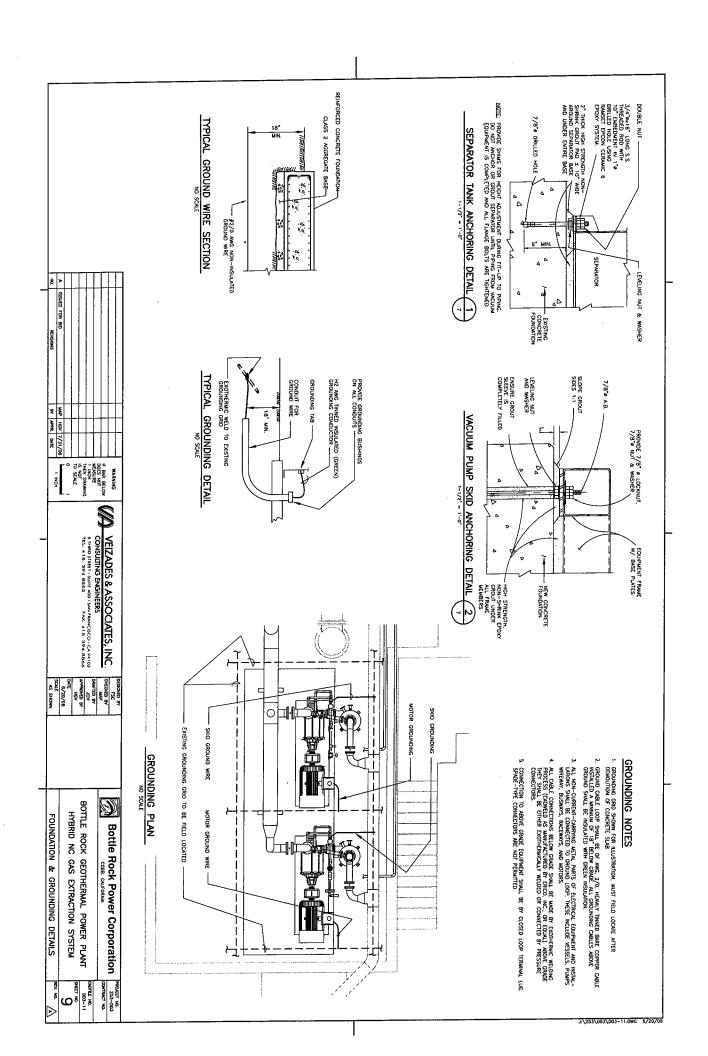


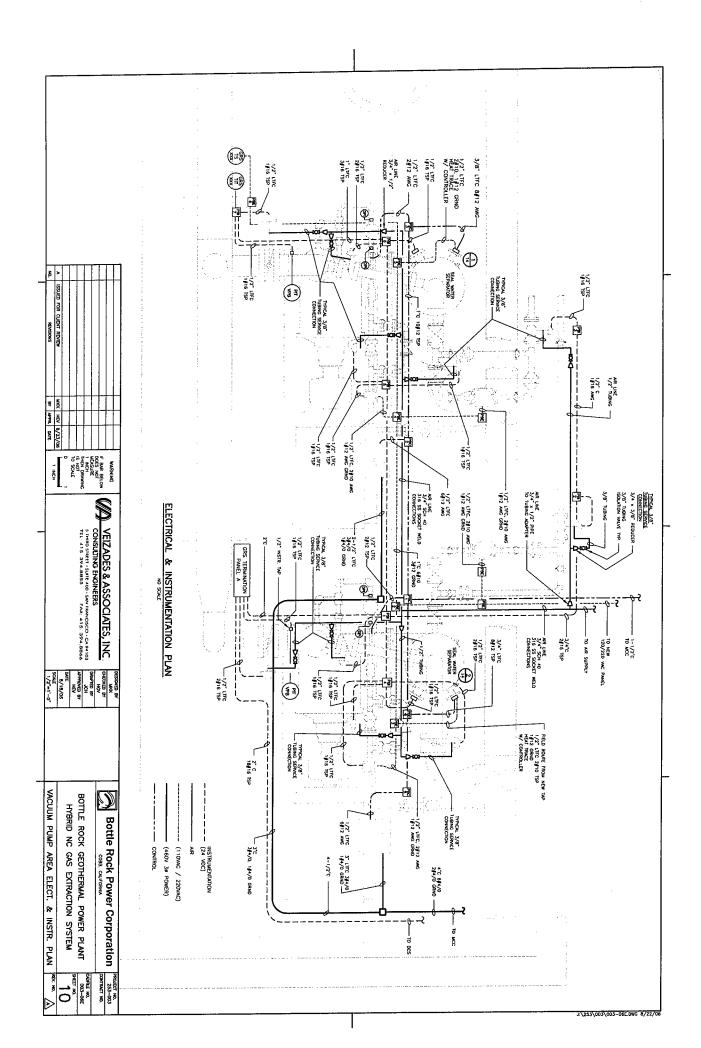


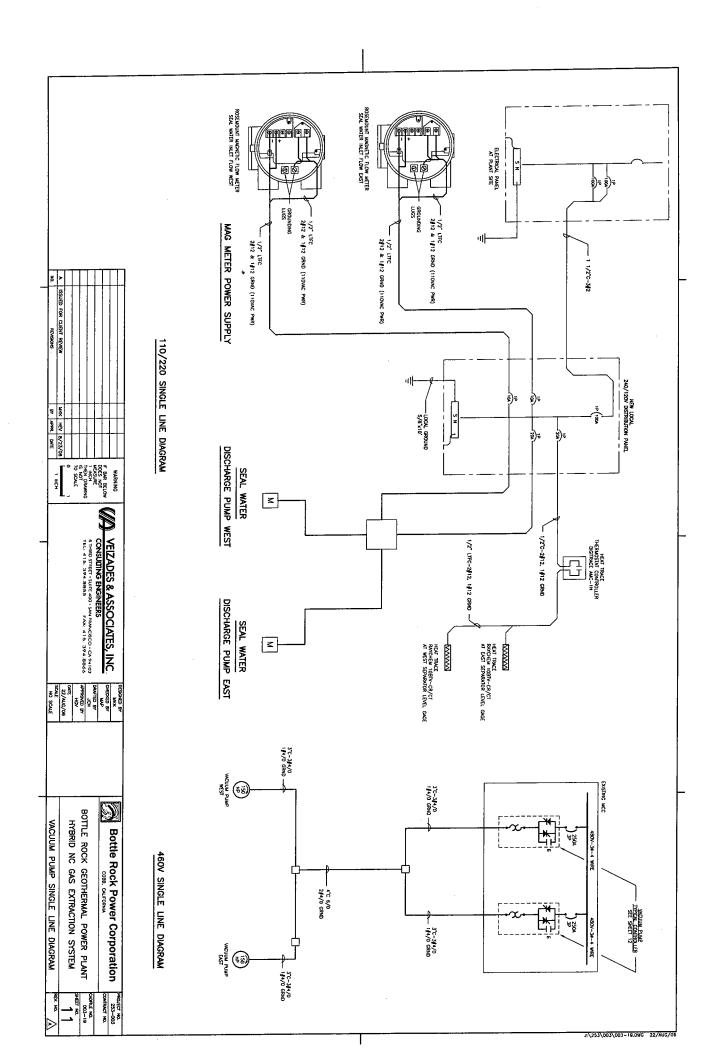


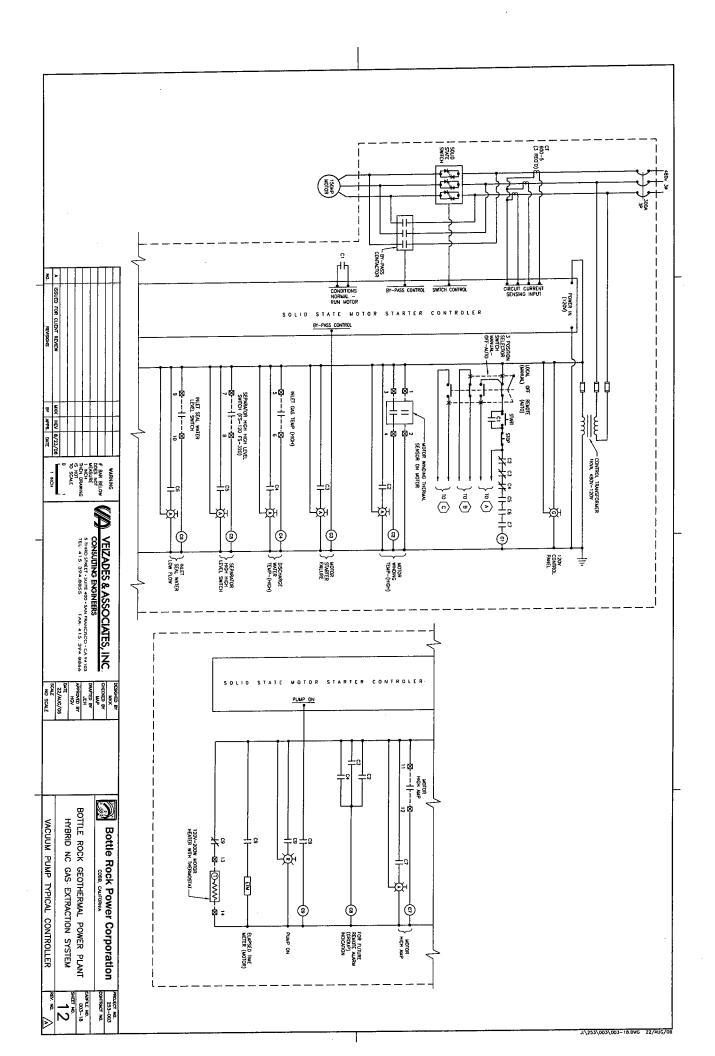


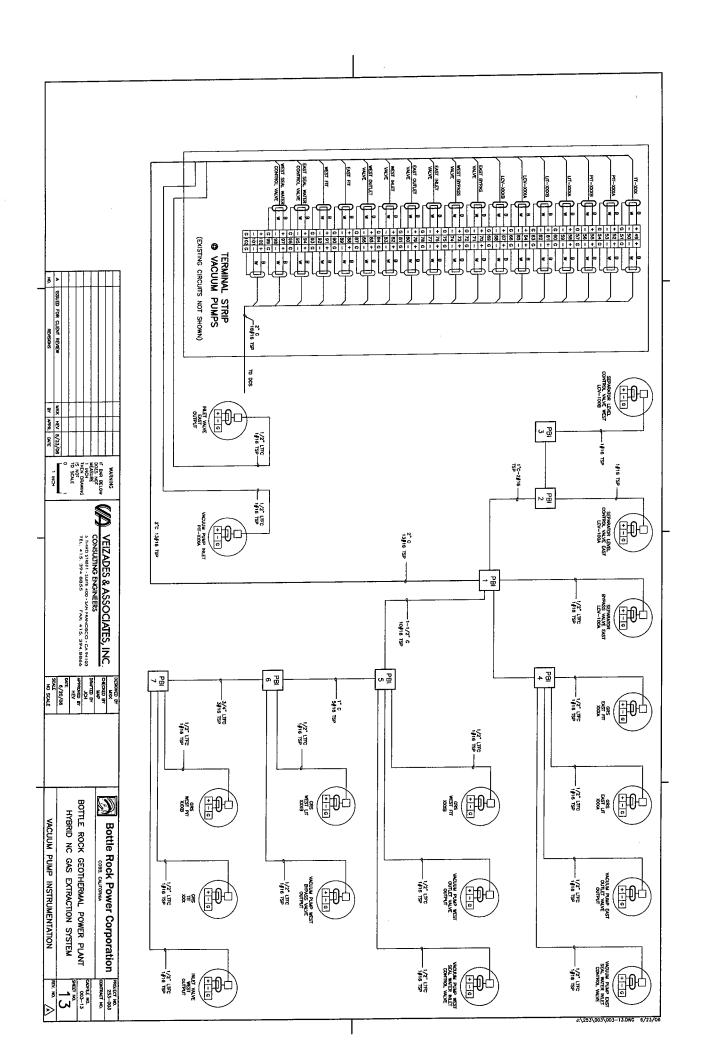


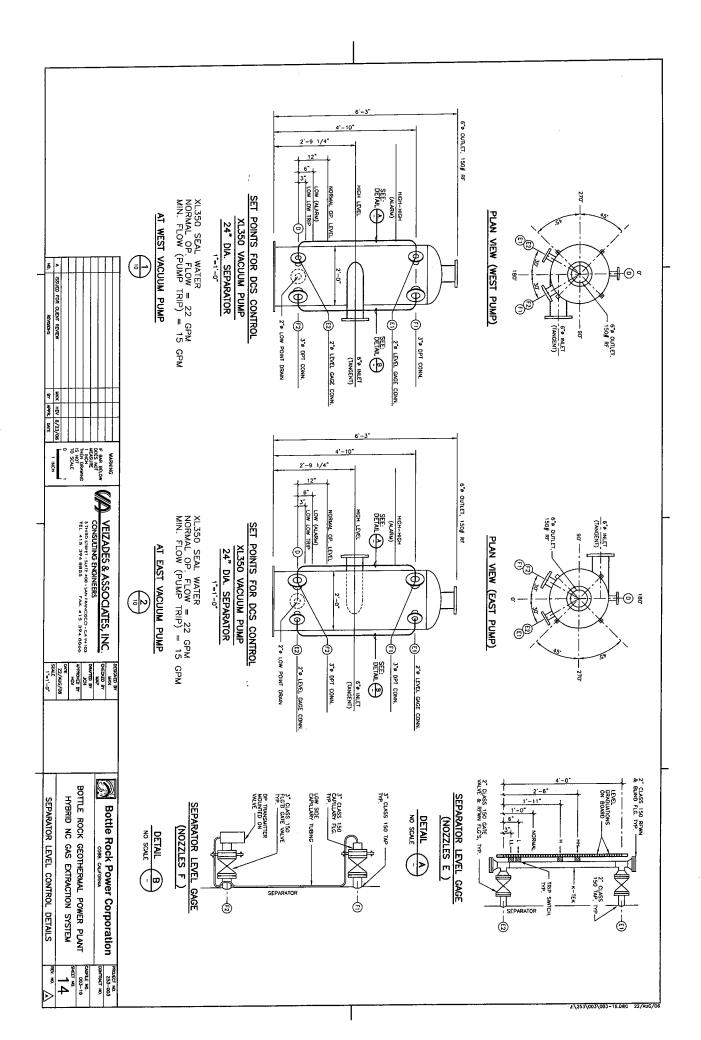


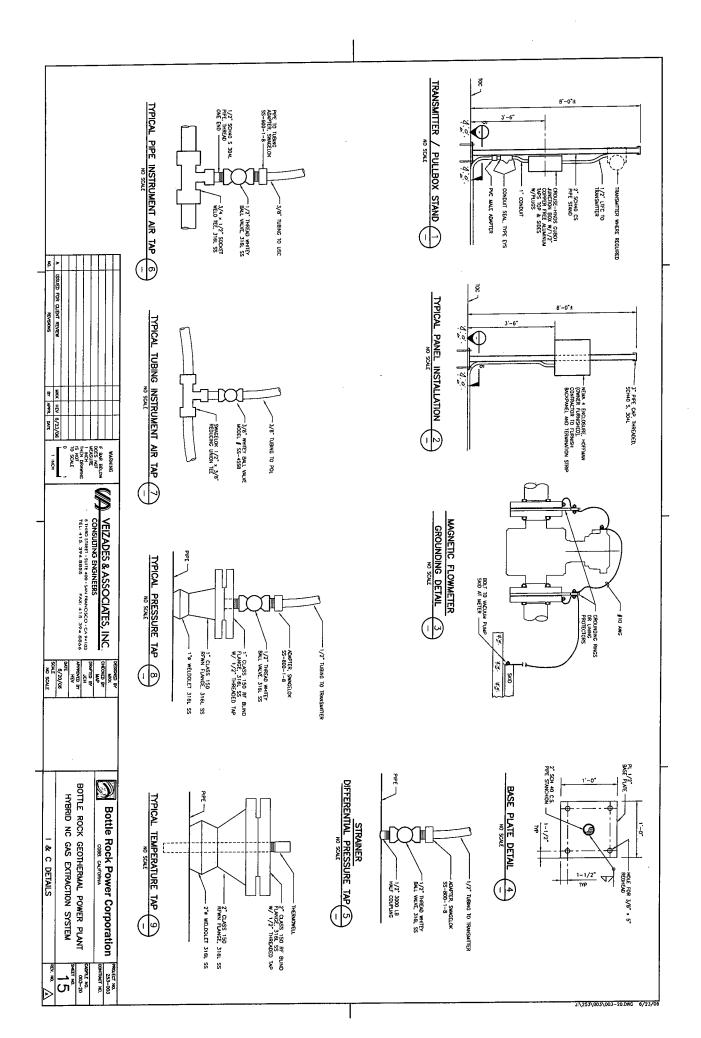


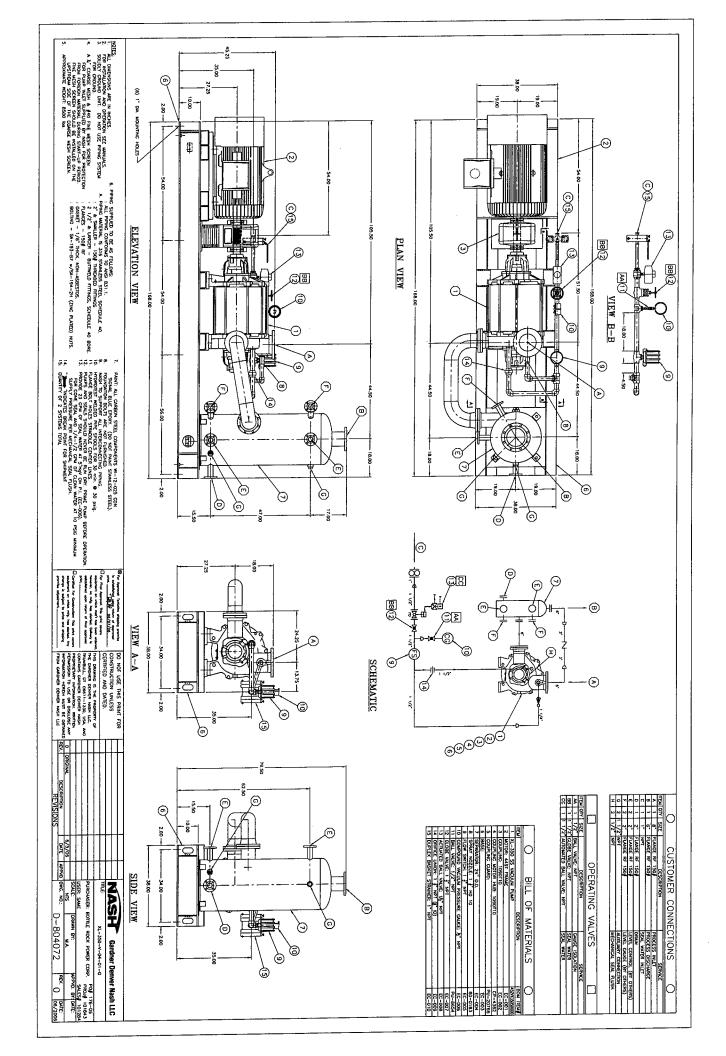












### BOTTLE ROCK POWER CORPORATION (BRPC) POWER PLANT AND STEAMFIELD CONTROL SYSTEM

### Introduction

The supervisory control system originally installed at the Bottle Rock facility is at present in a non-operational state due to failed and missing equipment. The technologies utilized in the existing system are non-standard, are in general obsolete, and are severely handicapped by a lack of suitable repair parts and maintenance equipment necessary for startup and long term operations and maintenance. Other concerns include a lack of integration between the power block, gas treatment, and steam field control sub-systems, high operational manpower requirements, and in general a lack of redundancy in any of the subsystems. BRPC is recommending that a new Digital Control System (DCS) be installed that will use all of the existing measurement and control points, but will now allow these points to be viewed and controlled from either the power plant control room or from the Stretford control area.

### Replacement System Criteria

Due to the aforementioned issues, a replacement control system has been designed to provide superior total project performance through tight system integration and enhanced control system algorithms, reduced operational and maintenance manpower loading by the utilization of advanced system and human machine interface (HMI) programming packages, advanced data collection, monitoring, and manipulation capabilities, continued long term hardware and software support, reduced spare parts inventory, and high overall reliability. Allen Bradley, the market share leader in PLC based automation systems, has been selected to provide the system hardware and programming software for the project. An Allen Bradley approved system integrator, Wood Group, has been contracted to engineer, construct, program, and commission the system.

### System Description

The Bottle Rock control system architecture is based on Allen Bradley's ControlLogix family of automation processors. These processors are among the most advanced automation controllers available in the market today, offering a high performance control platform for multidiscipline control as well as the widest range of communication, analog, and digital I/O modules available in the industry.

The proposed system implementation for the Bottle Rock project is outlined in Figure 1. Redundant ControlLogix processors and power supplies on the turbine/generator, balance of plant, and H2S abatement control subsystems provide bumpless switchover to the backup process assembly in the highly unlikely event of a processor or power supply failure. Communications between the processors and their associated I/O modules is accomplished using Allen Bradley ControlNet protocol, allowing high speed, deterministic bi-directional transfer of time critical data. The ControlNet protocol also

supports media redundancy to ensure continued system operation in the event of failure of one of the redundant data highways.

Communications between the Operator Interface Consoles, I/O Servers, and the processor controller systems will utilize Industrial Ethernet protocol. Industrial Ethernet provides ease of networking, seamless integration with standard IT systems, as well as a nearly endless selection of hardware and software options. Redundant I/O servers located in the Main and Stretford control rooms will allow operations personnel to perform all plant operations from either location as well as allow continued plant operation in the event of a single I/O server failure. Citech HMI software will enable all plant and wellfield process variables to be monitored, logged, and adjusted as required from any of the OIC or server workstations.

Communications between the remote wellfield control systems and the main plant control will be accomplished via encrypted wireless Ethernet. Non-redundant CompactLogix processors will be utilized as hot standby is not required, however a full complement of spares will be located on site to enable expedient system repairs if required.

Required electrical protection protective relaying will utilize modern microprocessor based equipment designed to provide adequate system protection as well as meet CAISO and PG&E system protection requirements. Redundant relays will be installed as required ensure high system availability.

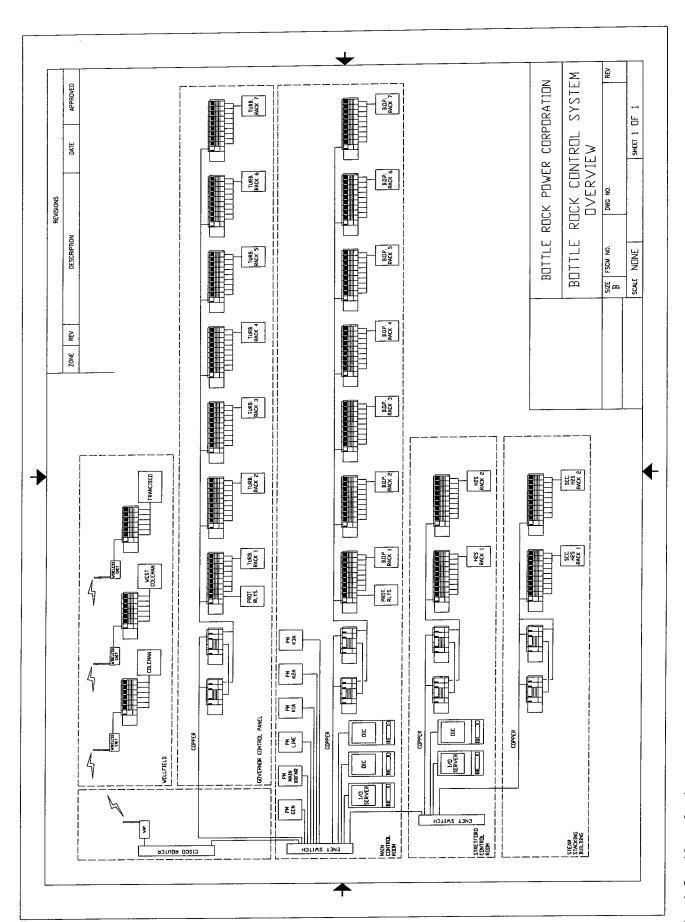
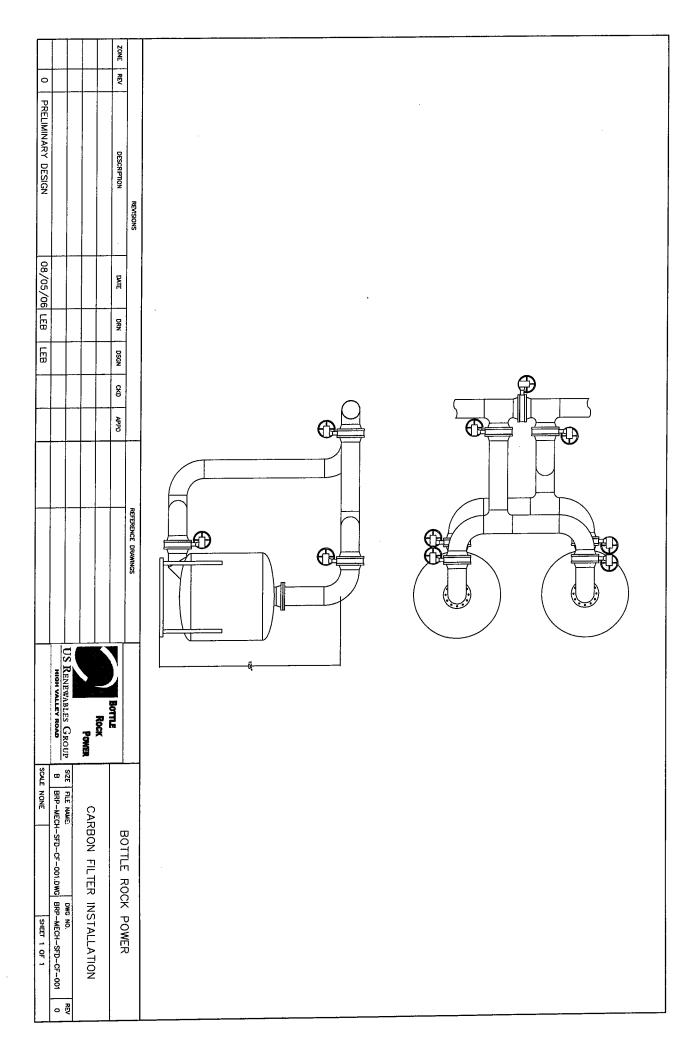


Figure 1. Control System Overview

### BOTTLE ROCK POWER CORPORATION (BRPC) STRETFORD SYSTEM MODIFICATION

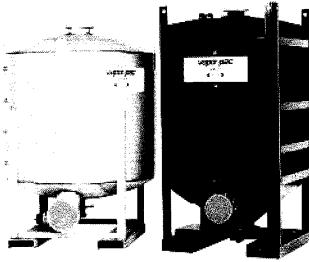
### Installation of carbon filters.

The plant proposes adding one (and in the future possibly a second) 100% flow, carbon bed filters to aid in the removal of mercury from the non-condensable gas stream. The size is yet to be determined but will be approximately 120 cubic feet of carbon.



### **VAPOR-PAC**\* Service Based Equipment





VAPOR-PAC® Stainless Steel

VAPOR-PAC® Plastic

Calgon Carbon's VAPOR-PAC® Service meets industrial needs for cost-effective removal of volatile organic compounds (VOCs) at air emission sources.

The VAPOR-PAC® Service features a small, easily transportable adsorber which contains 1,800 pounds of activated carbon. The adsorber can handle air flows up to 1,000 cfm.

Designed to remove both toxic and non-toxic VOCs, the adsorption system is especially useful for short term projects and for treatment of low volume flows that contain low to moderate VOC concentrations. Common applications include VOC removal from process vents, soil remediation vents, and air stripper off-gases.

To accommodate a wide variety of process conditions, VAPOR-PAC® adsorbers are available in two basic designs: a polyethylene model that offers excellent corrosion-resistance, and a stainless steel model that can withstand higher temperatures and slight pressure or vacuum conditions.

Calgon Carbon provides the adsorber, carbon, spent carbon handling, and carbon reactivation (after the carbon meets the company's acceptance criteria) as part of the VAPOR-PAC\* Service. Ductwork and fans are the only equipment that require a capital expenditure by the user.

When carbon becomes saturated with VOCs, the system is replaced with another adsorber containing fresh carbon.

By using this unique service, users can generally achieve VOC removal and regulatory compliance objectives, minimize operating costs, and eliminate maintenance cost because the equipment is owned and maintained by Calgon Carbon.\* Additionally, because organic compounds are safely destroyed through the carbon reactivation process, costs and regulations typically associated with waste disposal can be eliminated.

Please contact a Calgon Carbon Technical Sales Representative to learn more about the advantages of VAPOR-PAC® Service for your specific VOC control needs.

 Damage to VAPOR-PAC\* Unit caused by negligence or misapplication is the responsibility of the user.

### Features and Benefits of VAPOR-PAC® Service

- Adsorbers are specifically designed for ease of installation and operation.
- Adsorbers are available in plastic (polyethylene) and metal (stainless steel) construction to accommodate a wide variety of applications.
- Can operate in series or parallel mode or a combination of both to handle various flows and concentrations.
- · System exchange eliminates on-site carbon handling.
- Recycling of spent carbon (as approved by carbon acceptance testing) eliminates disposal problems.
- Capital expenditure is eliminated since Calgon Carbon Corporation owns and maintains the equipment.

### **Installation Instructions**

See bulletin #ES-IB1026-0305 for details on how to install a VAPOR-PAC\*.

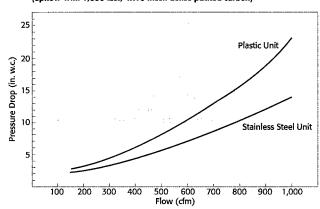
### **Safety Considerations**

See safety bulletin #TI-006-08/94 for important safety considerations.

### **Optional Equipment**

Inlet and outlet flange adaptors for ANSI flange or stub hose connections.

### Vapor Pac Unit Pressure Drop (upflow with 1,800 lbs., 4x10 mesh dense packed carbon)





### **VAPOR-PAC**<sup>®</sup> Service Based Equipment

### **VAPOR-PAC®** (Plastic) Specifications

Vessel Dimensions	44 <sup>1</sup> / <sub>4</sub> " x 44 <sup>1</sup> / <sub>4</sub> " x 89 <sup>3</sup> / <sub>8</sub> "				
Inlet & Discharge Connections	6" PS 15-69 duct flanges				
Carbon Volume	60 cu. ft. (1,800 lbs.)				
System Shipping Weight	Empty - 2,400 lbs., Spent - 4,200 lbs.				
Temperature Rating	150° F (max)				
Static Pressure Rating above Carbon Level	20" w.c. (max)				
Vacuum Pressure Rating above Carbon Level	2" w.c. (max)				

### **Materials of Construction**

Vessel	Polyethylene	
Frame	Expoxy coated carbon steel	
Inlet Flanges, Elbow, Septum	PVC	
Discharge Flange	Polyethylene	
Fasteners & Bottom Valve Support Plate	Steel, plated	
Sample Fittings & Sample Canister	PVC	

### **VAPOR-PAC®** (Stainless Steel) Specifications

Vessel Diameter	5'
Vessel Height	7′ 1″
Inlet & Discharge Connections	8' PS 15-69 duct flanges
Carbon Volume	60 cu. ft. approx. (1,800 lbs.)
System Shipping Weight	Empty - 2,800 lbs., Spent - 4,600 lbs.
Static Pressure Rating above Carbon Level	15 psig
Vacuum Pressure Rating above Carbon Level	Full .

### **Materials of Construction**

Vessel	316L stainless steel				
Skid and Support Frame	304 stainless steel				
Inlet Flanges, Elbow, Septum	316L stainless steel				
Discharge Flange	316L stainless steel				
Fasteners & Bottom Valve	300 series stainless steel				
Sample Fittings & Sample Canister	PVC				

### Caution

Wet activated carbon preferentially removes oxygen from air. In closed or partially closed containers and vessels, oxygen depletion may reach hazardous levels. If workers are to enter a vessel containing activated carbon, appropriate sampling

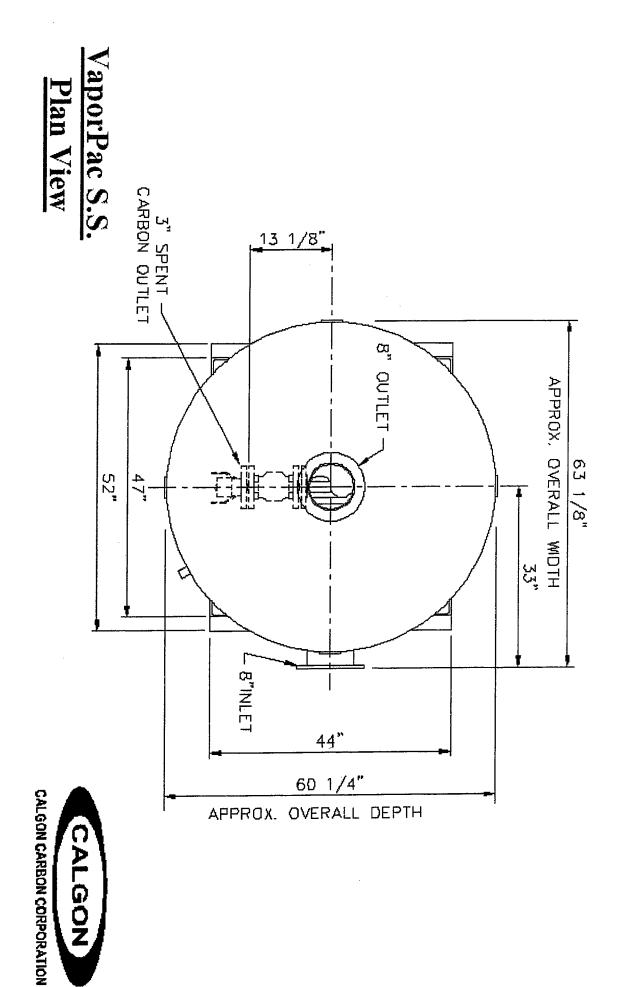
and work procedures for potentially low oxygen spaces should be followed, including all applicable Federal and State requirements.



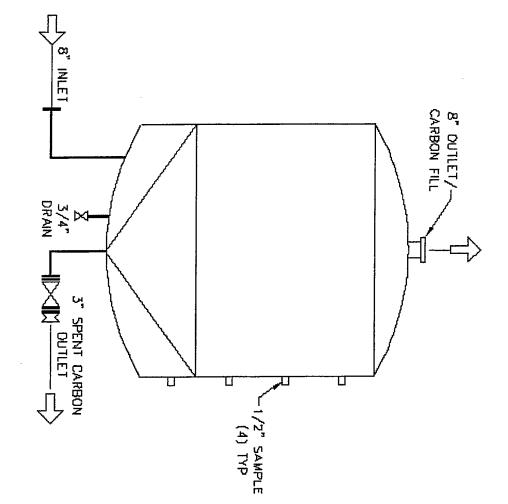
Calgon Carbon Corporation P.O. Box 717 Pittsburgh, PA USA 15230-0717 1-800-422-7266 Tel: 412-787-6700 Fx: 412-787-6713 Calgon Carbon Asia 65 Chulia Street #37-03 OCBC Centre Singapore 049513 Tel: +65 6 221 3500 Fx: +65 6 221 3554 Chemviron Carbon European Operations of Calgon Carbon Corporation Zoning Industriel C de Feluy B-7181 Feluy, Belgium Tel: + 32 (0) 64 51 18 11 Fx: + 32 (0) 64 54 15 91

You	Your local office								
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### VaporPac S.S. Flow Diagram



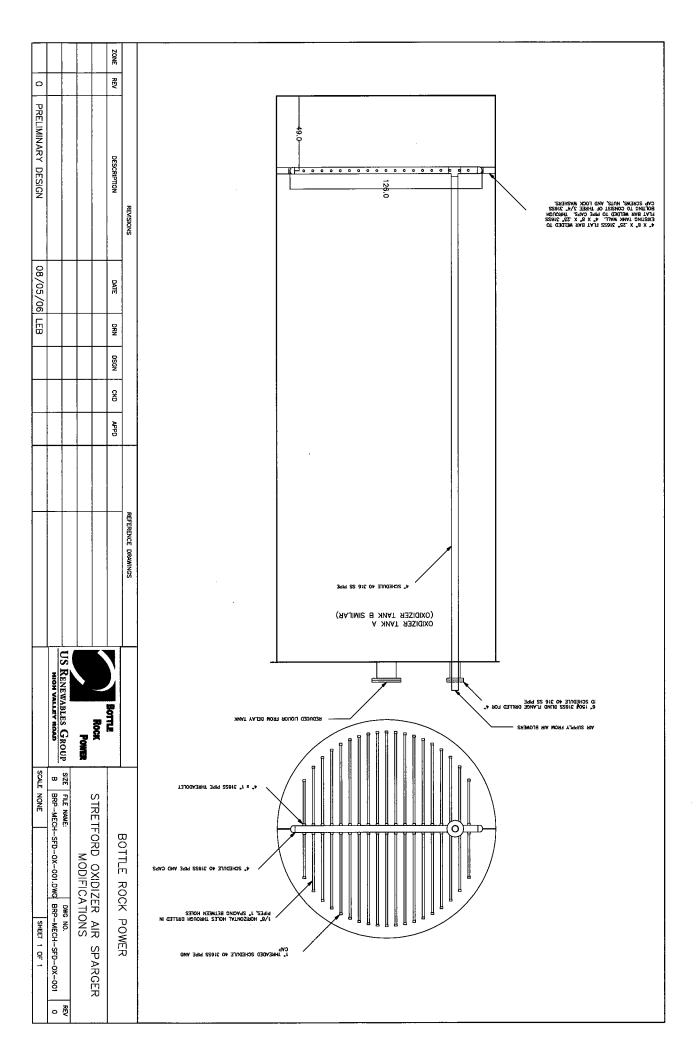


### BOTTLE ROCK POWER CORPORATION (BRPC) STRETFORD SYSTEM MODIFICATION

### Delivery of atmospheric air to the oxidizer tanks.

Air is currently introduced into the oxidizer tanks at four mixing venturis per tank. Atmospheric air commingles with Stretford solution that is discharging into the delay tank. The air and Stretford solution enters the delay tank about 4' off the bottom of the tank. The venturis have a tendency to plug due to small amount of elemental sulphur precipitating out at this point.

The plant proposes adding a sparging header inside each tank about 5' off the bottom. This header will deliver air more evenly and will potentially eliminate the plugging that occurs in the venturis. The original delivery system described above will remain in place and fully functional.



### BOTTLE ROCK POWER CORPORATION (BRPC) Cooling Tower Sparger

Per the request of LCAQMD the plant is submitting a design for returning hotwell condensate directly to the cooling tower basin and dispensing the condensate through a distribution header. Also, BRPC currently has multiple options for routing the condensate: (A) Commingle the condensate with the circulating water just prior to the cooling tower risers. (B) Commingle the condensate with the circulating water at the discharge of the condenser. (C) Commingle the condensate with the circulating water at the inlet to the condenser. (D) In combination with any of the above listed condensate flow paths, up to 50% of the hotwell condensate can be reinjected through a spray header into the vacuum side of the main condenser. Thus offering an additional opportunity to volatilize entrained hydrogen sulfide.

