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File No. 039610-0001

October 9, 2007

VIA FEDEX

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-1
1516 Ninth Street, MS-4
Sacramento, California 95814-5512

Re: Victorville 2 Hybrid Power Project: Docket No. 07-AFC-1

Dear Sir/Madam:

Pursuant to California Code of Regulations, title 20, sections 1209, 1209.5, and 1210, enclosed herewith for filing please find Applicant's Response to Questions Concerning HTF VV2 Leak Detection.

Please note that the enclosed submittal was filed today via electronic mail to your attention and to all parties on the CEC's current electronic proof of service list.

Very truly yours,

Paul E. Kihm
Senior Paralegal

Enclosure

cc: CEC 07-AFC-1 Proof of Service List (w/encl. via e-mail)
Michael J. Carroll, Esq. (w/encl.)

Response to Questions Concerning HTF VV2 Leak detection

The Applicant has not yet selected an EPC (Engineering, Procurement and Construction) contractor for the VV2 Project and therefore, final specifications for the Heat Transfer Fluid (HTF) leak detection system have not yet been developed. However, the Project's HTF leak detection approach for VV2 will be based on a combination of practices utilized by the CEC-permitted SEGS facilities (e.g., Kramer Junction). The SEGS facilities have been operating for nearly 20 years and the VV2 Project will incorporate lessons learned from the SEGS plants.

The heat transfer system will be comprised of multiple Variable Frequency Drive (VFD) pumps, an HTF holding tank (expansion vessel), a steam generator, condenser, boiler, auxiliary heater, isolation valves, differential pressure and temperature sensors, actuators, flow meters, approximately 24 miles of piping (along the multiple rows of solar arrays), 260,000 gallons of HTF (the amount contained in the entire piping system) and state-of-the art Distributed Control System (DCS) technology.

The basic modes of operation of the heat transfer system differ between daytime and nighttime hours.

1) Daytime (sunlight) operations include a VFD pump that will move HTF (~730° F-high psi) through a Heat Collection Element (HCE). The HCE is positioned directly through or over a horizontal focal point of the parabolic trough mirror. The parabolic mirror focuses the sun's energy on the HCE tube where the resident HTF absorbs the intense heat of the sun. The HTF system transports the heated HTF to a heat exchanger where the absorbed heat is transferred to water, which is then super heated and turned into steam which is then used to generate electricity.
2) During nighttime hours, the HTF continues to circulate through the system, but at a much lower temperature and pressure than during the day. The temperature of the HTF must be kept above its crystallization point of 54°F at all times and an auxiliary heater is provided for this purpose.

The Solar Collector Assembly (SCA) which houses the parabolic trough mirrors includes a local controller that will track the location of the sun +/- 0.1 degrees, monitor the temperature of the HTF and will report operational status, alarms, and diagnostics to the main solar field control computer.

Rapid Loss Monitoring (Detection of Large Volume Leaks) - The 250-acre solar field's approximately 24 miles of HTF system piping will include multiple piping loops (each serving a different portion of the solar field) with individual isolation valves. The system will incorporate the use of sensors capable of detecting flow and pressure, located at the input and output collectors of each section of HTF piping loop. If the recorded flow or pressure of a specific HTF piping loop exceeds the normal operating range, computerized plant monitoring software will trigger an alarm, trip the applicable VFD pump, and isolate the affected portion of the solar field, thereby immediately stopping the flow of HTF to the leak area.

Control room operators will be able to monitor VFD pump discharge pressure and flow. The monitoring system will utilize pressure transmitters and a software algorithm that is continuously checking the system's operational status. The advantage of this method is that it can respond to a rupture anywhere in the system instantaneously and automatically.

Detection of Small Volume Leaks– The leak detection system will also include automatic recordation of temperature, pressure and volume in the HTF holding tank. These measurements allow the operator to identify *common operating points* under typical configurations for the system so that tank levels can be checked as the system is at or passes through those operating points. The approach is analogous to measuring the coolant fluid in an automobile cooling system by observing an outside reservoir that has a fixed measuring point – when the car's engine is heated up it is possible to simply observe the reservoir's markings to see if the system has lost fluid.

In the HTF system's case, the monitoring system would be based on recorded tank levels at peak daily operating temperatures and overnight shut-down tank levels (the common operating points). If there is a small leak it will manifest itself as a drop in the level of HTF in the holding tank compared to the benchmarks that have been established during the initial days or weeks of the system's operation. By comparing these printouts on a daily basis, the operators will be able to detect small variations that would be associated with slight leaks in the HTF system.

Upon determining that such small volume leak is occurring, operators can be dispatched with Photo Ionization Detectors (PIDs) to detect the leak's location and immediately initiate repair/mitigation measures.

The system will also utilize fixed pole mounted PID's located on the downwind sides of the 250-acre solar field. These detectors will be integrated into the monitoring software logic and will be capable of detecting fugitive HTF molecules during daytime or nighttime conditions. The latest generation of PIDs can detect concentrations of VOC's as low as one part per billion.

Visual Inspection: VV2 Project operations will involve regular (at least once a day) walk-downs and visual inspections of the entire solar field including the HTF system (pumps, valves, flanges, joints, etc.). Regular visual inspection is an effective means of detecting small leaks. Evidence of leaks from the daily inspection will be immediately reported, investigated, and any necessary repairs promptly scheduled.

In summary, day-to-day plant operations will use state-of-the art computerized methods/systems to monitor and control the various elements of the solar field, including the HTF system. These high tech methods will be supplemented by careful daily visual monitoring of the HTF system. The combination of automated systems, eyeballs, and procedures to ensure prompt response to identified leaks will effectively manage potential concerns related to releases from the HTF system.

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Natural Gas	Predominantly Methane, CAS-8006-14-2	Health-0 Fire-4, Extreme Fire Hazard Reactivity-0	None Established	Pressurized carbon steel pipeline	Pressure relief valves	1.004 x 10^9 lbs/year	N/A, Continuously delivered to the site via pipeline.
Hydrogen Gas	99+% Hydrogen CAS 1333-74-0	Health-0 Fire-4, Extreme Fire Hazard Reactivity-0	None Established	In generator cooling loop 320 lb, with maintenance inventory of 650 lb in a "tube trailer"	Pressure safety tank, crash posts, pressure relief valves	960 lb/year	1 to 3 trailers per year

Revised Table 6.7-3
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Aqueous Ammonia (ammonium hydroxide), < 20% solution	Ammonia < 20% CAS 1336-21-6	Health-3, Causes irritation/burns Fire-1 Reactivity-0	25 ppm (NIOSH)	Carbon steel tank (30,000 gal)	Spill containment, ammonia detectors and alarms and RMP	152,000 gallons per year	Weekly
Sodium Hydroxide, 50% solution (Caustic Soda) – Mixed Bed Anion Regenerant.	Sodium Hydroxide, 50% CAS 1310-73-2	Health-2, Causes irritation, Burns Fire-0 Reactivity-0	2 mg/m^3 OSHA	Carbon steel tank (7,500 gal)	Isolated from incompatible chemicals and secondary containment area	130,000 lb/year (10,230 gal/year)	Monthly or quarterly
Sodium Hypochlorite, 12.5% solution (Bleach)	Sodium Hypochlorite, 12.5% CAS 7681-52-9	Health-3, Causes irritation/burns Fire-1 Reactivity-1	0.5 ppm (TWA), 1 ppm (STEL) as Chlorine	Plastic tank (2,500 gallons)	Secondary containment	161,000 lb/year (16,200 gal/year)	Monthly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Sulfuric Acid, 93% solution – Mixed Bed Cation Regenerator	Sulfuric Acid, 93% CAS# 7664-93-9	Health-3, Causes irritation/burns Fire-0 Reactivity-0	OSHA TWA 1 mg/m*f*, ACGIH STEL 3 ppm	Lined, carbon steel tank (10,000 gal)	Isolated from incompatible chemicals, lined tank, and secondary containment	3,485,000 lb/year (228,195gal/year)	Weekly/Bi-Weekly
HCL 30%-Demin Solution (Hydrochloric Acid) – Used in Weak Acid Cations 7647-01-0	HCL 30% 7647-01-0	Health-3, Causes Irritation, Burns Fire-0 Reactivity-0	5 ppm ACGIH TLV, 5 PPM OSHA PEL	Lined, carbon steel tank (10,000 gal)	Isolated from incompatible chemicals, lined tank, and secondary containment	217,900 lb/year (22,000 gal/year)	Monthly
Nalco PC 191, RO Antiscalant-Used in H.E.R.O and Make-Up R.O	No Hazardous Components	Health-0 Fire-1 Reactivity-0	None Established	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	14,000 lb/year (1,610 gal/year)	Monthly
Nalco Eliminox – Boiler Oxygen Scavenger Feed	5% to 10% Carbohydrazide CAS 497-18-7	Health-0 Fire-0 Reactivity-0	None Established	200 gallon port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	15,000 lb/year (1,652 gal/year)	Monthly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Nalco BT 4000 – Boiler Phosphate Feed (Primary Ingredient: Sodium Tripolyphos-phate CAS 7758-29-4)	1% to 5% w/w Sodium Hydroxide CAS 1310-73-2	Health-3, corrosive Fire-0 Reactivity-0	ACGIH TLV 2 mg/ m^3	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	36,000 lb/year (3,900 gal/year)	Monthly
Nalco 8338 – Closed Loop Cooling	10% to 30% w/w Potassium Nitrate CAS 7758-09-0	Health-1 Fire-0 Reactivity-0	None Established	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	3,100 lb/year (338 gal/year)	Monthly
Nalclear 7766- Used in Lime Softening	20% to 40% w/w Hydrotreated Light Distillate CAS 64742-47-8	Health-0 Fire-1 Reactivity-0	ACGIH/TLV: TWA-5mg/m^3 STEL-10mg/m^3 OSHA/PEL TWA-5mg/ m^3 STEL-10mg/ m^3	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	3,000 lb/year (360 gal/year)	Monthly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Nalco 73550 – Clean Tower Biodetergent	30% to 60% w/w Nonionic_Alkyl_Polyglycoside CAS (Proprietary)	Health-2, Severe Eye Irritant Fire-1 Reactivity-0	None Established	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	24,000 lb/year (2,600 gal/year)	Monthly
Nalco 7330 Slug Feed – Closed Loop Cooling	1% to 5% w/w 5-chloro-2-Methyl-4-Isothiazolin-3-one CAS 26172-55-4 0.1% to 1% w/w 2-Methyl-4-Isothiazolin-3-one CAS 2682-20-4 1% to 5% w/w Magnesium Nitrate CAS 10377-60-3	Health-3, Corrosive Fire-0 Reactivity-0	Manufacturer's Recommendation: 5-chloro-2-Methyl-4-Isothiazolin-3-one TWA:0.076 mg/m^3 STEL:0.23 mg/m^3 2-Methyl-4-Isothiazolin-3-one TWA:1.5 mg/m^3 STEL: 4.5mg/m^3	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	92,000 lb/year (10,200 gal/year)	

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Nalco 3DT195 – Aliphatic Aldehyde,	1% to 5% w/w Substituted Aliphatic aldehyde CAS (Proprietary)	Health-0 Fire-1 Reactivity-0	None Established	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	244,000 lb/year (25,400 gal/year)	Monthly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Nalco TRI-ACT 1800, Boiler Water Treatment Chemical – Amine Feed	5% to 10% w/w Cyclohexylamine CAS 108-91-8 10% to 30% w/w Monoethanolamine CAS 141-43-5 10% to 30% w/w Methoxypropylamine CAS 5332-73-0	Health-3, Corrosive Fire-2, Combustible Reactivity-0	ACGIH/TLV:Substance(s) Cyclohexylamine TWA: 10 ppm , 41 mg/m^3 Monoethanolamine TWA: 3 ppm , 7.5 mg/m^3 STEL: 6 ppm , 15 mg/m^3 OSHA/PEL: Substance(s) Cyclohexylamine TWA: 10 ppm , 40 mg/m^3 Monoethanolamine TWA: 3 ppm , 8 mg/m^3 STEL: 6 ppm , 15 mg/m^3 AIHA/WEEL: Substance(s) Methoxypropylamine TWA: 5 ppm STEL: 15 ppm	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	4,700 lb/year (566 gal/year)	Monthly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Nalco Actibrom 1338 – Sodium Bromide	30% to 60% w/w Sodium Bromide CAS 7647-15-6	Health-1 Fire-0 Reactivity-0	None Established	400 gallon or smaller port-a-feed plastic tote	Isolated from incompatible chemicals, and secondary containment	59,000 lb/year (5,704 gal/year)	Monthly
Carbon Dioxide	100 % Carbon Dioxide CAS 124-38-9	Health-1 Fire-0 Reactivity-0	ACGIH_TLV-TWA 5,000 ppm, 30,000 ppm 15 min STEL OSHA PEL 5,000 ppm	Carbon steel cylinders, 24 tons maximum onsite, 6 tons in the largest container	Carbon steel tank with crash posts	6 tons/year	Monthly or Quarterly
Calcium Oxide, 90% (Quick Lime)-Used in Lime Softening	Calcium Oxide CAS 1305-78-8	Health-1 Fire-0 Reactivity-1	ACGIH TLV 2 mg/m^3 OSHA PEL 0.05 mg/m^3	4,000 pounds maximum, 50-pound bags on pallets, mixed with water as needed in 2,000-gallon fiberglass tank	Secondary containment for tank; dry, indoor storage for dry material	571,000 lb/year	Weekly or Bi-Weekly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Sodium Carbonate, Na2CO3, 93% (Soda Ash)- Used in Lime Softening	Sodium Carbonate CAS 497-19-8	Health-2, Eye Burns, Skin Irritant Fire-0 Reactivity-0	Not Established	8,000 pounds maximum, 50-pound bags on pallets, mixed with water as needed in 2,000-gallon fiberglass tank	Secondary containment for tank; dry, indoor storage for dry material	2,643,000 lb/year	Weekly or Bi-Weekly
Ferric Sulfate, 35% solution	Ferric Sulfate CAS 10028-22-5	Health-1 Fire-0 Reactivity-0	1 mg/m^3	Carbon steel or fiberglass tank, 8,000 gal	Secondary containment	96,000 gal/year	Monthly
Magnesium Chloride, 31% solution	Magnesium Chloride CAS 7791-18-6	Health-1 Fire-0 Reactivity-0	Not established	Carbon steel or fiberglass tank, 10,000 gal	Secondary containment	120,000 gal/year	Monthly
Sulfur hexafluoride gas	Sulfur hexafluoride CAS 2551-62-4	Health-2, Can produce toxic component in fire conditions Fire-0 Reactivity-0	Not established	1,920 lb used in switchgear	None	Leakage less than 9.6 lb/year	Event Driven, 96 lb or less net delivery every 10 years

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Turbine Lube Oil, ISO VG 32	Solvent Refined Heavy Paraffinic Distillate CAS 64742-88-4	Health-0 Fire-1 Reactivity-0	OSHA & ACGIH TWA/PEL 5 mg/m^3	Carbon steel tanks, largest container 1,200 gal, 4,000 gal total in tank storage, maintenance inventory in 55-gallon steel drums	Secondary containment area for each tank and for maintenance inventory	1000 gal/year	Bi-annualy
Transformer Electric Insulating Oil, Envirotemp FR3 dielectric oil	98.5%+ Vegetable Oil, primarily Soybean oil <1% Antioxidant Additive, <1%Cold Flow Additive <1%Colorant CAS Not Identified	Health-0 Fire-1 Reactivity-0	OSHA PEL 5 mg/m^3 ACGIH TLV 10 mg/m^3	Carbon steel transformers, largest vessel 16,000 gal, total inventory 65,000 gal, no maintenance inventory onsite	Used only in transformers, secondary containment for each transformer	No normal usage. Only replaced in the event of contamination	One delivery per contamination event. Frequency unpredictable.

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Diesel Fuel	Diesel Fuel CAS 68476-34-6	Health-0 Fire-2, Flammable liquid Reactivity-0	PEL not established, TLV 100 mg/m^3 (ACGIH)	Carbon steel tank (1,200 gallons [generator]), Carbon steel tank (300 gallons [fire-water pump engine])	Stored only in fuel tanks of emergency engines, secondary containment.	8,000 gal/year	Monthly
Therminol VP-1™	73.5% Diphenyl ether CAS 101-84-8 26.5% Biphenyl CAS 92-52-4	Health-2, Eye and Skin Irritant Fire-1 Reactivity-0	Biphenyl: 0.2 ml/m^3; Diphenyl ether: 1 ml/m^3, OSHA	260,000 gallons in system, no additional storage	Continuous monitoring of fluid levels in system; prompt clean up and repair.	32,500 gal year replaced, remainder sent back for recycling	Annually
Detergent, ZOK	Less than 1% oleyl sarcosinate CAS 110-25.8	Health-1 Fire-1 Reactivity-0	None	55-gallon plastic drums or 330-gallon plastic totes	Brought onsite only when required for maintenance cleaning of the turbines.	1,320 gal/year	Bi-Weekly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Acetylene	100% Acetylene CAS 74-86-2	Health-1 Fire-4, explosive gas Reactivity-3, may decompose violently with heat and contact with incompatible materials.	ACGIH (simple asphyxiant) 2,500 ppm 2,662 mg/m^3 NIOSH recommended ceiling	125 cuft bottles	None, kept in a bottle storage rack.	1,000 cuft/year	Monthly
Oxygen	100% Oxygen CAS 07782-44-7	Health-2 (liquid, 0 for gas) Fire-0 Reactivity-0	None Established	250 cuft bottles	None, kept in a bottle storage rack.	5000 cu ft	Monthly

Revised Table 6.7-3
Summary of Special Handling Precautions for Large Quantity Hazardous Materials

Hazardous Material	Hazardous Component(s) and CAS #	NFPA Hazard Ratings[1]	Permissible Exposure Limit	Storage Description (Capacity)	Storage Practices and Special Handling Precautions	Annual Quantities Used	Deliveries
Kerosene	90% to 100% kerosene CAS 8008-20-6	Health-2, Eye and Skin Irritant Fire-3, Flammable Liquid Reactivity-1	ACGIH TLV 200 mg/m^3	55 gallon drums	stored in flammable liquids shed with secondary containment	250 gallons	Monthly
Misc Paint, Oil, and Lubricants	Varies	Varies	Varies, Consult Manufacturer Provided MSDS	55 gal drum, 5 gallon and 1 gallon containers, quart containers, ect.	stored in flammable liquids shed, flammable liquids cabinets with secondary containment.	2,750 gallons	Varies

STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of:	)	Docket No. 07-AFC-1
	)	
Application for Certification,	)	**ELECTRONIC PROOF OF SERVICE**
for the VICTORVILLE 2	)	**LIST**
HYBRID POWER PROJECT	)	
by the City of Victorville	)	**(revised August 22, 2007)**
	)	
	)	

☒ Transmission via electronic mail and by depositing one original signed document with FedEx overnight mail delivery service at Costa Mesa, California with delivery fees thereon fully prepaid and addressed to the following:

DOCKET UNIT

CALIFORNIA ENERGY COMMISSION
Attn: DOCKET NO. 07-AFC-1
1516 Ninth Street, MS-4
Sacramento, California 95814-5512
docket@energy.state.ca.us

☒ Transmission via electronic mail addressed to the following:

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DECLARATION OF SERVICE

I, Paul Kihm, declare that on October 9, 2007, I deposited a copy of the attached:

APPLICANT'S RESPONSE TO QUESTIONS CONCERNING HTF VV2 LEAK DETECTION

with FedEx overnight mail delivery service at Costa Mesa, California with delivery fees thereon fully prepaid and addressed to the California Energy Commission. I further declare that transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service List above.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 9, 2007, at Costa Mesa, California.

Paul Kihm