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May 19, 2010

DOCKET 02-AFC-4CDATE MAY 19 2010

RECD. MAY 19 2010

Angelique Juarez-Garcia Compliance Project Manager Siting, Transmission and Environmental Protection Division California Energy Commission 1516 Ninth Street, MS-2000 Sacramento, CA 95814

RE: SUPPLEMENTAL REQUEST FOR STAFF APPROVED PROJECT MODIFICATION: WALNUT ENERGY CENTER AUTHORITY WALNUT ENERGY CENTER (02-AFC-4C): INSTALLATION OF MICRO FILTER FEED TANK AND SHADE STRUCTURE

Dear Ms. Juarez-Garcia:

I am writing on behalf of Walnut Energy Center Authority ("WECA"), the license holder for the Walnut Energy Center ("WEC"). On March 9, 2010, WECA filed a "Request For Staff Approved Modification: Walnut Energy Center Authority Walnut Energy Center (02-AFC-4C): Installation Of Micro Filter Feed Tank And Shade Structure" (the "March 9, 2010 Request").

While the March 9, 2010 Request was complete and accurate, we have agreed to withdraw the March 9, 2010 Request and re-submit this Supplemental Request, adding additional detail, clarifying the location and function of certain facilities to be added to the WEC project site.

With this background, the purpose of this Supplemental Request is to obtain Energy Commission Staff approval for the following modifications to the WEC: (1) the addition of a new Micro Filter Feed Tank, and (2) the addition of a new Shade Structure to cover other portions of the Zero Liquid Discharge ("ZLD") system. As described below, the Micro Filter Feed Tank is needed for WEC to continue to effectively operate its ZLD water treatment process. The Shade Structure is necessary to prevent sun damage to certain other components of the ZLD system.

Micro Filter Feed Tank

In January 2009, Turlock Irrigation District ("TID") determined it was necessary to upgrade and optimize some of the internal components of the existing WEC ZLD system. The system was using multi-media filters to filter contaminants found in the reclaimed water. However, the multi-media filters were allowing excessive amounts of submicron material to pass through.

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This submicron material then fouled downstream equipment, resulting in poor performance, reduced run times, increased cleaning frequency, increased energy consumption, and additional waste.

As an alternative, TID sought to replace the multi-media filters with micro filtration equipment that provides more effective and efficient filtration. Since TID was replacing existing equipment with similar equipment within the same ZLD system area, the change contemplated at that time was not a modification requiring an amendment to the WEC license. The replacement of the filtration equipment's internal systems did not change the design, operation or performance of the WEC. In essence, the internal workings of the existing system was considered to be a "black box."

TID initiated a Request for Proposal process for the micro filtration equipment in the Spring of 2009. The responsive bids included, among other things, the addition of a Micro Filter Feed Tank to contain the cooling tower blowdown stream as a feed point for the new micro filtration equipment. Given the prior advice that the ZLD system was essentially a black box, no linkage was seen between the inclusion of a new tank in the responsive bids and the possibility of a need to notify the CEC, given the CEC's continuing oversight of new facilities that may affect project description. As a result of not seeing this linkage, the Micro Filter Feed Tank was installed with the micro filtration equipment.

The Micro Filter Feed Tank is a 24,000 gallon fiberglass tank (12' diameter x 30' in height). It is gray in color, matching the other structures at the WEC, and is located in the ZLD water treatment process area. This new tank is not clearly visible from outside of the plant property. The Micro Filter Feed Tank was sized to meet the design requirements of the new micro filtration equipment and stores the cooling tower blowdown for use in the micro filters. The tank provides enough storage to handle brief upsets in the micro filters without affecting the cooling tower chemistry.

Included in Attachment 1 are four figures that depict the tank location and dimensions. Figure 1 shows the new Micro Filter Feed Tank, the tank in the middle of the three tanks shown. The Micro Filter Feed Tank is approximately 2 feet shorter than the HERO Reject Storage Tank (on the right side in the picture). Figure 2 is a "Certified for Construction" drawing of the Micro Filter Feed Tank that shows its dimensions. The Certified for Construction designation is set forth in the "Revisions" table, dated July 13, 2009. Figure 3 is As Built drawing for the Micro

¹ The Micro Filter Feed Tank is a pre-fabricated tank. Drawings for prefabricated tanks are typically not Engineer stamped drawings. For example, there are seven prefabricated tanks on the WEC site, none of which required Engineer stamped drawings. The California Building Standards Code does not require that prefabricated tanks be Engineer stamped. Instead, prefabricated tanks are designed to applicable codes. In this case, the Micro Filter Feed Tank was designed to ASTM D3299, ASTM D4097, and PS 15-69, as applicable, and the 2006 IBC.

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Filter Tank Foundation Plan and Details. Figure 4 is an aerial of the WEC plant showing the locations of the Micro Filter Feed Tank and the "Shade Structure" described below. Finally, Appendix A is a memorandum from a Professional Engineer of the District's Civil Engineering and Water Resources Administration Department documenting the reports and inspections associated with the "Microfiltration Feed Tank and Concrete Foundation." This memorandum confirms, among other things, "During the construction and installation, Civil Engineering staff was present to observe soil compaction underneath the concrete foundation, formwork, rebar installation, concrete finishing, and installation of the feed tank and steel anchors."

Shade Structure

TID proposes to install the Shade Structure to protect specific components of the micro filtration equipment from sun damage. As shown in Attachment 1, Figure 4, the Micro Filter Feed Tank will not be covered by the Shade Structure. Instead, the Shade Structure will be built above certain Micro Filtration equipment, specifically, the Micro Filter membranes, pumping equipment and electrical controls. The primary purpose of the Shade Structure is to protect the Micro Filtration membranes from the damaging effects of sunlight and UV rays.

The Shade Structure would be 44' long by 18'6" wide and approximately 13' in height. The equipment and smaller ZLD system tanks that would be protected by the Shade Structure are approximately 7 feet in height. The Shade Structure would be supported by galvanized steel beams and the metal roof would be painted gray to match the rest of the WEC. Attachment 2 is a two-page, Engineer-stamped drawing of the Shade Structure.

Conclusion

Based on these facts, the WECA believes that the inclusion of the Micro Filter Feed Tank and Shade Structure constitute an insignificant project change that can be approved by Staff. Pursuant to section 1769(a)(2), Title 20, California Code of Regulations, a formal amendment is not required if Energy Commission Staff determines that:

- There is no possibility that the modification may have a significant effect on the environment, and
- The modification will not result in a change to or deletion of a condition of certification, or make changes that would cause the project not to comply with applicable laws, ordinances, regulations, or standards (LORS).

Nevertheless, the information presented herein is consistent with the requirements of Section 1769 of the California Energy Commission regulations. The information presented herein provides a complete description of the proposed modifications, as required by Section

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1769(a)(1)(A). The information also includes a discussion of the necessity of the proposed changes, per Section 1769(a)(1)(B). The project modification is based on information that was not known during the time of the certification, and it does not undermine the assumptions, rationale, findings, or other bases for the final decision, per Sections 1769(a)(1)(C) and 1769(a)(1)(D). As discussed above, the modification does not have the potential to create any significant impacts on the environment and makes the project consistent with all applicable LORS, per Sections 1769(a)(1)(E) and 1769(a)(1)(F). The modification will not adversely affect the public, per Section 1769(a)(1)(G). In addition, the modification will have no adverse effects on nearby property owners, per Sections 1769(a)(1)(H) and 1769(a)(1)(I).

Should you have any questions, please do not hesitate to contact George Davies, Turlock Irrigation District Combustion Turbine Department Manager at (209) 883-3451or me at 916-447-2166.

Sincerely,

ELLISON, SCHNEIDER & HARRIS L.L.P.

Jeffery D. Harris

Attorneys for Walnut Energy Center Authority

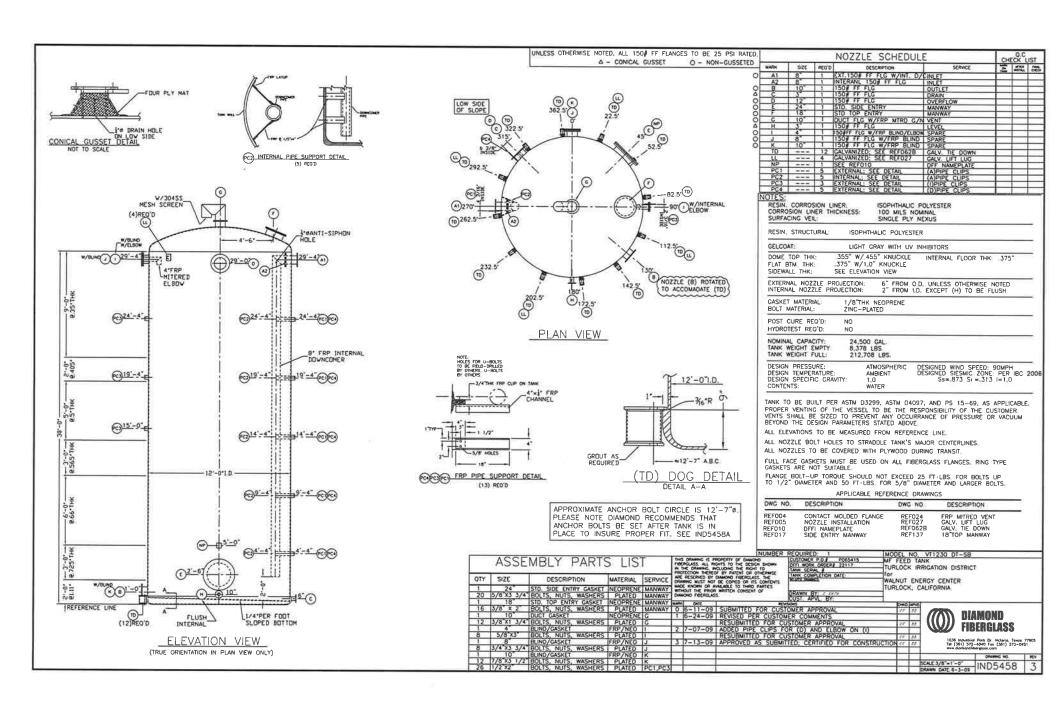
Attachments

cc: Chris Marxen, CEC, with Attachments

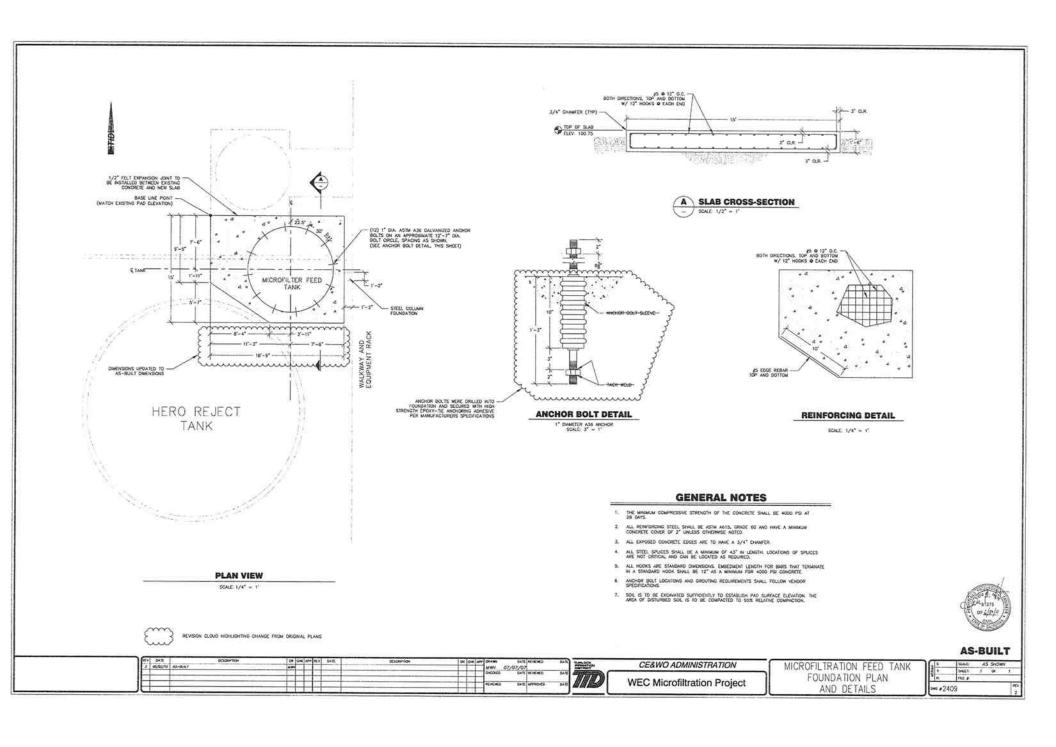
ATTACHMENT 1 FIGURE 1 MICRO FILTER FEED TANK



ATTACHMENT 1 FIGURE 2 CERTIFIED FOR CONSTRUCTION DRAWING OF THE MICRO FILTER FEED TANK

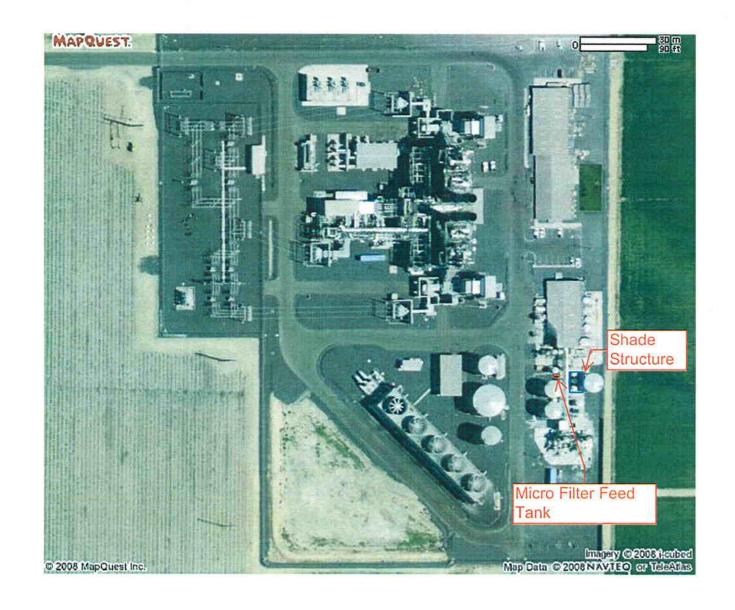


ATTACHMENT 1 FIGURE 3 AS BUILT DRAWING FOR THE MICRO FILTER TANK FOUNDATION PLAN AND DETAILS



ATTACHMENT 1 FIGURE 4 AERIAL OF THE WEC PLANT SHOWING THE LOCATIONS OF THE MICRO FILTER FEED TANK AND THE "SHADE STRUCTURE"

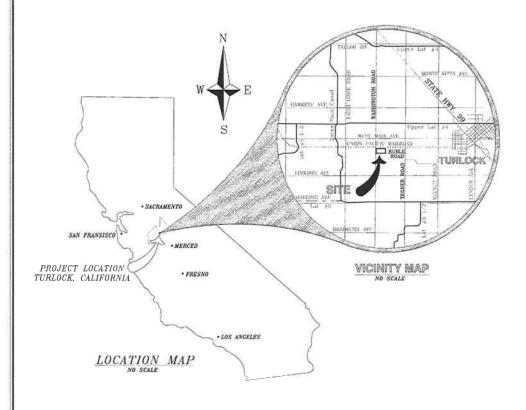
ATTACHMENT 1: FIGURE 4: Aerial of the WEC plant showing the locations of the Micro Filter Feed Tank and the "Shade Structure"



ATTACHMENT 2 ENGINEER-STAMPED DRAWING OF THE SHADE STRUCTURE – PAGES 1 & 2

PROJECT PLANS FOR

EMERGY CE Z.L.D. - PALL M.F.S. SHADE STRUCTURE



PROJECT DATA

PROJECT: PROJECT LOCATION: ZLD PALL MES SHADE STRUCTURE

TECHNICAL CONTACT:

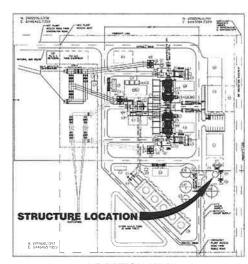
TURLOCK IRRIGATION DISTRICT TOU HER SENIOR CIVIL ENGINEER (209) 883-8365

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TITLE SHEET

SHEET NO.

PLAN AND DETAILS



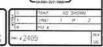
LOCATION MAP

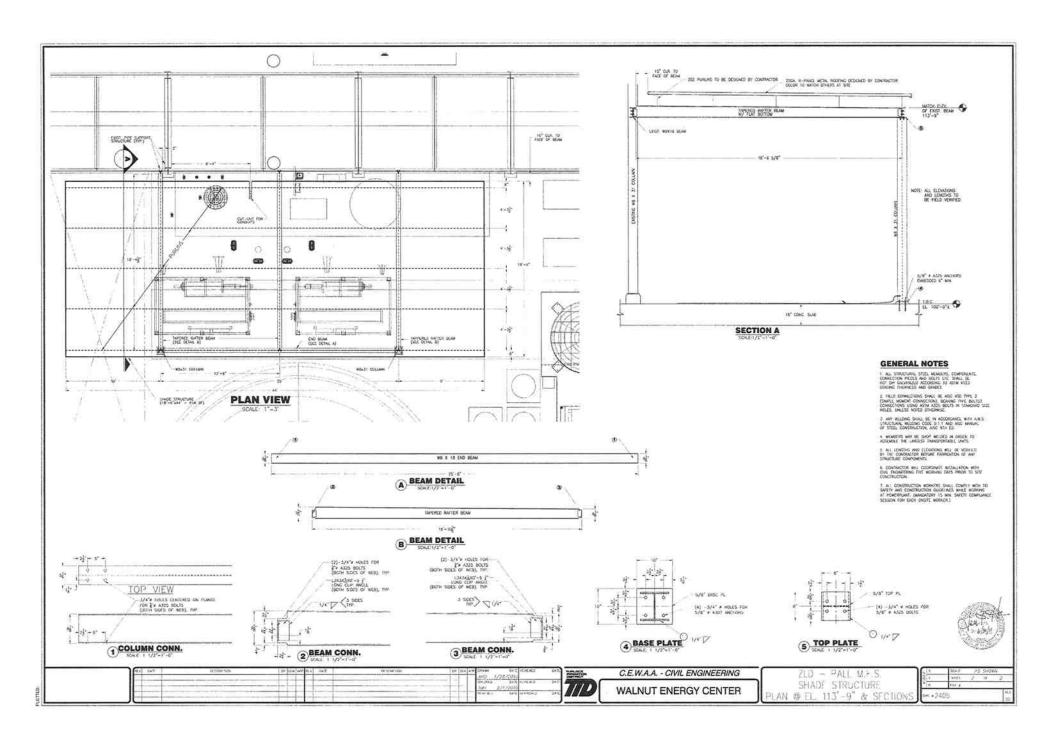
UNAUTHORIZED CHANGES & USES CAUTION: THE EXCINEER PREPARING THESE PLANS WILL NOT BE RESPONSIBLE FOR, OR LABLE FOR, UNAUTHORIZED CHANGES TO OR USES OF THESE PLANS. ALL CHANGES TO THE PLANS MUST BE IN WRITING AND MUST BE APPROVED BY THE PREPARER OF THESE PLANS.

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C.E.W.A.A. - CIVIL ENGINEERING WALNUT ENERGY CENTER

ZLD - PALL M.F.S SHADE STRUCTURE PLAN @ EL 113'-9" & SECTIONS





APPENDIX A

Memorandum from a Professional Engineer of the District's Civil Engineering and Water Resources Administration Department



CIVIL ENGINEERING AND WATER RESOURCES ADMINISTRATION

MEMORANDUM

To: George Davies

cc: Les Barrigar

From: Tou Her

Date: May 19, 2010

Re: Microfiltration Feed Tank and Concrete Foundation



The microfiltration feed tank concrete foundation was prepared and constructed by September 08, 2009. The feed tank was subsequently installed and anchored in place by October 19, 2009. During the construction and installation, Civil Engineering staff was present to observe soil compaction underneath the concrete foundation, formwork, rebar installation, concrete finishing, and installation of the feed tank and steel anchors. The following observations and conclusions were made:

- 1. Soil underneath the concrete foundation was well compacted and meets the relative compaction requirements of 95 percent.
- 2. All forms and rebars were inspected prior to concrete pour. Rebar size, spacing, clearances, splice lengths, and hooks meet specifications. All rebar intersections were tied.
- 3. Concrete foundation area was free of all debris. Concrete delivery times were verified to be acceptable. Concrete mix descriptions were consistent and meet design specifications.
- 4. The steel anchors were drilled and set in place with high strength epoxy at locations specified. Anchor bolt sleeves were not used.
- 5. Overall preparation, construction, and installation of the microfiltration feed tank and concrete foundation was completed per plans and specifications.