STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of:	)	Docket No. 03-AFC-1
Application For Certification For the Roseville Energy Park By the City of Roseville	)	STAFF'S POST-HEARING BRIEF

On January 25, 2005, the Committee for the Application for Certification of the Roseville Energy Park ("Committee") held an evidentiary hearing on all technical topics. The Committee requested that all parties file post-hearing briefs by February 14, 2005.

During the evidentiary hearing, applicant and staff testified that both parties are in agreement on all Conditions of Certification, except Trans-7 and Soil and Water-9, as reflected in the Final Staff Assessment and Errata (Exhibits 47 and 48; 1/25/05 RT, pp. 26-28) and Staff's Report of Resolution of Issues (Exhibit 49). Applicant and staff further agreed that Soil and Water-9 should read as follows: "Verification: At least ~~60~~ 30 days prior to site mobilization…" as reflected in applicant's Revised Prehearing Conference Statement (1/25/05 RT, pp. 26-28; Exhibit 50).

Therefore, the only remaining issue following the evidentiary hearing was over Condition of Certification, Trans-7, which would require the cooling towers to be designed and constructed to be able to accommodate plume abatement technology. After working on specific language, applicant and staff have agreed to the following condition:

Traffic and Transportation
Condition of Certification Trans-7

TRANS-7 The project owner shall design and construct the cooling towers to be able to accommodate plume abatement technology.

The project owner shall develop a plan for the installation and operation of video cameras, video recorders, visible range measurement equipment or methods, and meteorological data collection equipment to monitor for cooling tower generated ground-hugging plumes on local roadways.

Prior to commencement of power plant operation, the project owner shall install video cameras, video recording equipment, visible range measurement equipment or methods, and meteorological data collection equipment to collect windspeed, relative humidity and temperature, and shall operate the equipment during the months October through March in accordance with the approved monitoring plan.

If the cooling towers generate ground-hugging plumes that reduce driver sight distance visibility (using sight distance measurement standards in the CalTrans Highway Design Manual, 2001) to less than 150 feet on local roadways with posted speed limits up to 30 mph, or to less than 300 feet on local roadways with posted speed limits of up to 50 mph, or a vehicle accident is reported that identifies a ground-hugging plume as a contributing factor, the project owner shall be required to install either of the following:

1. Plume abatement technology with a dry-cooling section that has a stipulated plume abatement design point equal to the temperature and relative humidity recorded at the time that a ground-hugging plume that reduced the sight distance visibility below the levels described above were observed, or other abatement design point that the cooling tower manufacturer will guarantee to mitigate the ground-hugging plumes to visibility distances that are greater than the levels described above; or

2. An automatic control system that reduces plant operations to ensure that ground-hugging plumes do not form at the temperature, relative humidity and wind speed recorded at the time that a ground-hugging plume was observed that reduced the sight distance visibility below the levels described.

The project owner shall continue the ground-hugging plume monitoring program until either plume abatement technology or an automatic control system as described above are installed or for three consecutive winters without observations of ground-hugging plumes that meet the sight distance visibility requirements above. Ground hugging plume monitoring may be extended beyond three years by the CPM if either the power plant operating profile during the winter monitoring periods is less than 50 percent of its capacity factor or the meteorological conditions were not conducive to plume formation. If there have been no observed plumes within the three year period, the CPM and project owner shall meet to discuss the need for continued monitoring.

If during the monitoring program a ground-hugging plume has caused sight visibility to fall below the distances stated above on a local roadway, or a vehicle accident has occurred which reports a cooling tower generated ground-hugging plume as a contributing factor, the project owner shall immediately modify plant operations as necessary to prevent ground-hugging plumes until operation of the selected ground-hugging plume prevention option and shall notify the CPM. If the project owner elects to install the automatic control system, the project owner shall continue plume monitoring during months in which the automatic control system is operating for a period of three years after operation of the automatic control system. Should the automatic control system fail to prevent ground-hugging plumes then the project owner shall either install the plume abatement technology or readjust the automatic control system to prevent

ground-hugging plumes. In the event the automatic control system is readjusted, the project owner shall continue plume monitoring during months in which the automatic control system is operating for a period of three years after readjustment.

If the project owner receives a complaint related to ground-hugging plumes, the project owner shall notify the CPM so that a CPM investigation of the complaint can be initiated, and, if warranted, remedial actions can be identified. Remedial actions may include additions or modifications to plume monitoring equipment and/or methods.

Verification: At least 60 days prior to ordering of the cooling towers, the project owner shall provide to the City of Roseville City Engineer for review and comment and to the CPM for review and approval, the engineering specifications for the cooling towers that demonstrate that plume abatement technology can be installed at a later date if required. The material submitted to the CPM shall include a copy of the letter accompanying the transmittal to the City.

Prior to July 1 of the first year of plant operation, the project owner shall provide to the City of Roseville City Engineer for review and comment and to the CPM for review and approval a plan to monitor for cooling tower generated ground-hugging plumes on local roadways. The CPM shall consider the meteorological conditions in determining when monitoring equipment will operate. The material submitted to the CPM shall include a copy of the letter accompanying the transmittal to the City.

The project owner shall provide to the CPM, within 30 days of the end of each ground-hugging plume monitoring month (October through March) a report that provides

evidence of the existence or non-existence of cooling tower generated ground-hugging plumes on local roadways, the visibility distance data recorded during such ground-hugging plume events, if any, the power plant's capacity factor for each hour of the month when the power plant was operating, and the meteorological data for that month. This report shall be provided on electronic media (CD, diskette, or memory stick).

If the project owner receives a complaint related to ground-hugging plumes, the project owner shall notify the CPM within 24 hours to initiate CPM investigation of the complaint. If at any time during each year's ground-hugging plume monitoring period the project owner or the CPM determines that the project is causing ground-hugging plumes on local roadways that lower visibility below the standards listed in this condition, or a vehicle accident has occurred which reports a cooling tower generated ground-hugging plume as a contributing factor, the project owner shall within 30 days provide to the CPM an installation schedule for the ground-hugging plume prevention option chosen, and within 150 days provide to the City of Roseville City Engineer for review and comment and to the CPM for review and approval, the engineering specifications for the ground-hugging plume prevention option chosen (abatement technology and/or automatic control system). If the project owner learns that the project is causing ground-hugging plumes on area roadways that lower visibility below the standards listed in this condition, the project owner shall notify the CPM within 24 hours.

As stated above, staff believes that all issues have been resolved and, therefore, no further briefing is necessary.

DATED: February 11, 2005

Respectfully submitted,

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KERRY A. WILLIS
Staff Counsel