August 20, 2003
LEG 2003-0552

The Honorable Robert Pernell
The Honorable Arthur Rosenfeld
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Re: SMUD Comments on the Presiding Member's Proposed Decision (PMPD) for the SMUD Cosumnes Power Plant Project (Docket No. 01-AFC-19)

Dear Commissioners Pernell and Rosenfeld:

The Sacramento Municipal Utility District ("SMUD") strongly supports the Presiding Member's Proposed Decision ("PMPD") for the Cosumnes Power Plant ("CPP") Project, which was issued on August 6, 2003, and urges its adoption at the Commission hearing on Tuesday, September 9, 2003.

Enclosed are SMUD's suggested Errata to the PMPD, including proposed revisions to the Adoption Order, all in a format that can be included in the final decision. In addition, Attachments A and B provide SMUD's responses to the Committee's request for additional information regarding hazardous materials and firewater pumps (PMPD, pp. 108, 270, respectively.)

Thank you for the Committee's consideration of these comments.

Sincerely,

ORIGINAL SIGNED

Steven M. Cohn
Assistant General Counsel

cc: Service List for CEC Docket No. 01-AFC-19
SMUD's Corporate Files

Attachments

SMUD'S PROPOSED COMMENTS IN RESPONSE TO SMUD CPP PMPD
CEC DOCKET NO. 01-AFC-19

PROPOSED ERRATA

AIR QUALITY

p. 34[1], **Condition AQ-36**:
The following sentence should be inserted immediately after the first sentence: **"The Air Pollution Control Officer may waive the annual PM10 and/or ROC source test requirement if, in the Air Pollution Control Officer's sole judgment, prior test results indicate an adequate compliance margin has been maintained."** AQ-36, which was uncontested during the evidentiary hearings, is one of the 43 conditions incorporated verbatim into the PMPD from the Sacramento Air Quality Management District's (SMAQMD's) Final Determination of Compliance. The above sentence was inadvertently left out and should be reinstated.

BIOLOGY

p. 68, **Condition BIO-12**, Item No. 8:
The setback requirement for the construction laydown area should be changed from 100 feet to **25 feet** from the seasonal stream and swale. The 25-foot setback is consistent with the conditions set forth in the Streambed Alteration Agreement and the Army Corps of Engineers' draft 404 permit, as well as the Committee's discussion in the Water Quality & Soils section, page 192, paragraph 2, sentence 3.

p. 70, **Condition BIO-14**, line 3:
The number of required Swainson's hawk replacement habitat compensation should be **53.9** acres, rather than 51.9 acres.

GEOLOGY

p. 91, para. 1, line 4:
The sentence should be revised to read: "The site is underlain by **un**consolidated silt …"

p. 92, para. 3, line 1:
The sentence should be revised to read: "SMUD refers to the **Caltrans** ~~**CDMG**~~ report of Mualchin …"

HAZARDOUS MATERIALS

p. 106, **Storage & Use**:
The second paragraph under this heading should be revised to read: "The only hazardous material~~s~~ proposed for use at the project in quantities exceeding the threshold amount ~~**are**~~ **is** aqueous ammonia~~ **and sodium hypochlorite**~~." As stated on page 108 of the PMPD, the amount of sodium hypochlorite stored on site does not exceed the threshold amount (below reportable quantity).

[1] **All page references are to the PMPD, issued August 6, 2003. SMUD's specific proposed errata are in bold.**

p. 106, Aqueous Ammonia:
The second sentence in para. 1 should be revised to read: "The ammonia will be stored in one 18,000 gallon capacity double walled ~~**underground**~~ storage tank **with an underground spill vault,** which is equipped with leak detectors, . . ." The aqueous ammonia tank will not be stored underground. It will be above ground, but with an underground spill vault.

Revise the last sentence in para. 1 to read: "The ammonia will be trucked in ~~**should the pipeline be down for any reason**~~." There is no proposal for an ammonia pipeline.

p. 108, Sodium Hydroxide:
Delete the reference in para. 1, line 3, to Condition of Certification HAZ-3. Condition HAZ-3 does not apply to sodium hydroxide.

The response to the Committee's request for information in para. 2, regarding the "appropriate procedures for the transportation, handling and storage of sodium hydroxide and sulfuric acid" is provided in Attachment A to these comments.

LAND USE

p. 121, **STATE LORS**:
Delete inapplicable references to California Coastal Act and State Tideland Leasing.

NOISE

pp. 125-126:
The references to "Leq" noise levels (p. 125, last para., p. 126, 3rd and 4th paras.) should be changed to "**L50**" instead to be consistent with Condition **Noise-6.**

WASTE MANAGEMENT

p. 188, Condition **WASTE-3,** line 2:
The reference in line 2 to "LA County Department of Hazardous Materials" should be changed to **"Sacramento County Environmental Management Department**."

The reference in the Verification, first sentence, to "insert local agencies" should be changed to "**Sacramento County Environmental Management Department**."

p. 189, **WASTE-5**:
The contact references in the last sentence to "the LA County Department of Hazardous Materials, the Los Angeles Regional Water Quality Control Board, and the Glendale Regional office of the California Department of Toxic Substances Control" should be changed to "**the Sacramento County Environmental Management Department, the Central Valley Regional Water Quality Control Board, and the Sacramento Regional Office of the California Department of Toxic Substances Control.**"

p. 190:
The references in the Description under State LORS, H&SC 25100, to the San Bernardino and Redlands Fire Departments should be changed to reference "**the Sacramento County Environmental Management Department and the Sacramento Regional Office of the California Department of Toxic Substances Control**."

WORKER SAFETY/ FIRE PROTECTION

p. 270, last paragraph:
The information requested by the Committee concerning the backup capabilities of the firewater pumping system is provided in Attachment B to these comments.

ADOPTION ORDER

p. 293:
A new finding should be added to read: "**The evidence of record establishes that no feasible alternatives to the project, as described during these proceedings, exist which would reduce or eliminate any significant environmental impacts of the mitigated project."**

p. 294:
The following three ordering paragraphs should be added to the Adoption Order to be consistent with the Commission Decision on the Palomar Energy Project (Docket No. 01-AFC-24), which was adopted on August 6, 2003:

> **"The decision is adopted on September 9, 2003, consistent with Public Resources Code section 25530 and California Code of Regulations, title 20, section 1720.4.**
>
> **Any petition requesting Commission reconsideration of this Decision (or any determination by the Commission on its own motion to reconsider) shall be filed and served on October 8, 2003, which is no later than 30 days after the date of adoption. (Pub. Resources Code section 25530.)**
>
> **Judicial review of certification decisions is governed by Section 25531 of the Public Resources Code."**

p. 294:
The following ordering paragraph should be added related to CPP Phase 2, which incorporates the uncontested paragraph jointly proposed by CEC staff and SMUD in the Final Staff Assessment (FSA), p. 1.1-7:

> **"Provided that the project owner submits an application within 3 years of the effective date of a Commission decision to approve Phase 1 of the project, the Commission's review of the application shall be limited to Air Quality, Water Resources, and Transmission System Engineering, unless any of the circumstances identified in Title 14, California Code of Regulations, section 15162(a)(1) - (3) have occurred (changes to the environment, laws and regulations, and the project). The Commission shall issue its findings and render a final decision on Phase 2 within 12 months after the supplemental application is deemed complete or, if the provisions of Title 20, California Code of Regulations, section 2021 et seq. are met, within 6 months after the application is deemed complete. If an application is not filed within 3 years, a new AFC will be required for Phase 2."**

ATTACHMENT A

SMUD RESPONSE TO COMMITTEE REQUEST FOR
ADDITIONAL INFORMATION RE: HAZARDOUS MATERIALS
(PMPD, P. 108)

The CEC requested additional information regarding appropriate procedures for transportation, handling and storage of sodium hydroxide and sulfuric acid at the CPP site (PMPD, p. 108). The following information is provided for supplemental information.

Sodium hydroxide and sulfuric acid would be used on the project site primarily for pH control in the cooling tower. As noted in Section 8.12.4.2.1 of the AFC, each of these chemicals would be delivered and stored in 300-gallon tote containers, with a maximum of 600 gallons expected on site at any time. Totes would be stored in separately curbed areas, designed to contain 150% of the container volume to minimize hazards in the event of a spill.

Due to the very low vapor pressure, sulfuric acid is not volatile upon release and potential harm to humans off-site is minimal. Both sodium hydroxide and sulfuric acid are non-flammable, but are reactive with water. Totes would be transported to the site by the vendors according to applicable DOT shipping and hazard regulations. Once onsite, the materials would be handled only by workers trained in hazardous materials recognition and spill control and countermeasures.

The following table summarizes the applicable standards for sodium hydroxide and sulfuric acid.

Table 1. Safe, Transportation, Handling and Storage of Hazardous Materials		
Chemical Name	Sodium Hydroxide (50%)	Sulfuric Acid (93%)
Characteristic	Caustic	Acid
Form	Liquid	Liquid
Container	300-gallon totes	300-gallon totes
Use	pH Adjustment of Cooling Tower	pH Adjustment of Cooling Tower
Maximum Quantity On site	600 gallons	600 gallons
DOT Shipping Name	Sodium Hydroxide, Solution	Sulfuric Acid, Solution
DOT Hazard Class/ ID No.	8, UN 1824, II	8, UN 1830, II

Proper Transportation Procedures

All transportation of sulfuric acid and sodium hydroxide will be implemented by approved vendors in accordance with applicable DOT standards for the hazard class indicated above. The transportation route will be the same as that used for aqueous ammonia.

Proper Handling and Storage Procedures

Before working with sulfuric acid or sodium hydroxide individuals will be trained in its proper handling and storage and will know how to use proper personal protective equipment. The plant operators will undergo 40-hour hazardous materials emergency operations training, which will be supplemented by specific training for each material encountered at the plant.

Sulfuric acid and sodium hydroxide will be stored in a cool, dry, well-ventilated area in tightly sealed containers protected from exposure to weather, extreme temperature changes, and physical damage. Currently, the storage area is separated from combustible and incompatible materials storage.

If a fire occurs in the immediate vicinity of sulfuric acid containers, they should be removed promptly if it can be done safely. If removal is not possible, use dry chemical or carbon dioxide to extinguish the fire for small fires. For large fires, flood the fire area with water from a safe distance.

Spill Management

If a sulfuric acid or sodium hydroxide spill or leak occurs, the following actions will be taken:

Onsite trained personnel will be notified to assess the spill/ leak immediately. If the leak is not small, the Fire Department will be notified by the County Emergency Communications Joint Powers Authority. Untrained persons or those without proper personal protective equipment must not enter areas with high concentrations of sulfuric acid or sodium hydroxide.

Evacuate and restrict people from the hazardous area of a release. Stop or control the source of exposure, if safe to do so.

If the exposure is from the spill of a solution, collect or confine the spilled material. Dilute and neutralize the spill and dispose absorbent materials in approved manner. Sulfuric acid or sodium hydroxide may be absorbed in vermiculite, dry sand, or similar material.

The manufacturer's Material Safety Data Sheet (MSDS) provides more information about hazards.

The CPP Hazardous Materials Business Plan (which is reviewed by Sacramento County EMD and various Fire Departments) will contain additional detailed procedures required by CCR Title 19 and the Health and Safety Code (Section 25504).

ATTACHMENT B

SMUD RESPONSE TO COMMITTEE'S REQUEST FOR ADDITIONAL INFORMATION REGARDING THE FIREWATER PUMPING SYSTEM (PMPD, P. 270)

The Presiding Members Proposed Decision (PMPD) requested additional information from SMUD regarding the backup capabilities of the firewater pumping system. (PMPD, p. 270.) This Attachment B provides the requested information.

Two firewater pumps serve the Cosumnes Power Plant (CPP). Each is electrically driven. The primary pump is powered by either of two completely separate on-site sources, which eventually lead back to the Rancho Seco switchyard in separate bays where these are interconnected to six 230 kV transmission lines that connect to SMUD's and the PG&E transmission grids. The motor control center serving the primary pump has multiple sources when the numerous switching configurations of the 480V and 4160V switchgear are considered. The backup fire pump is powered by an independent, off-site 12 kV source connected to SMUD's distribution system back to a separate transmission substation (Elk Grove). The transmission substation is part of the grid, which is interconnected by multiple power generation sources, including a mix of hydroelectric power supplied by SMUD's Upper American River Project, natural gas-fired cogeneration plants, and connected to the PG&E and WAPA transmission grids.

Since SMUD began operations as its own control area in 2002, SMUD operates independently from the California Independent System Operator (ISO). One of the significant benefits of the SMUD control area is that SMUD has isolated itself from the various operating scenarios, which were created by the ISO and resulted in rotating blackouts in California. SMUD also has the direct authority to determine and protect the critical loads in its system. In addition, SMUD will/and can direct its own system restoration and give priority to restoring service to critical systems at the Consumnes Power Plant. As a last resort, SMUD can disconnect from the statewide grid, creating an island electrical system, which is served by its own generation.

The fire system has been designed and sealed by a registered professional engineer, attesting that the firewater pump system meets the requirements of NFPA 20, *Installation of Stationary Pumps for Fire Protection, Chapter 6, Electric Drive for Pumps.* The on-site source with its redundancies, and off-site source with its redundancies, constitute two or more independent sources required by NFPA 20.