H. MANDALAY GENERATING STATION

RELIANT ENERGY, INC-OXNARD, CA

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1.0 GENERAL SUMMARY

Retrofitting the existing once-through cooling system at Mandalay Generating Station (MGS) with closed-cycle wet cooling towers is technically and logistically feasible based on this study's design criteria, and will reduce cooling water withdrawals from Channel Islands Harbor by approximately 95 percent. Impingement and entrainment impacts would be reduced by a similar proportion.

The preferred option selected for MGS includes 2 conventional wet cooling towers (without plume abatement), with individual cells arranged in an inline configuration to accommodate limited space at the site. Space limitations do not appear substantial enough to preclude plume-abated towers in the design if they were required to mitigate visual impacts. Initial capital costs for the towers would also increase by a factor of 2 or 3 and require a larger siting area.

Construction-related shutdowns are estimated to take approximately 4 weeks per unit (concurrent), although MGS is not expected to incur any financial loss as a result based on 2006 capacity utilization rates for all units.

The cooling tower configuration designed under the preferred option complies with all identified local use restrictions and includes necessary mitigation measures, where applicable.

1.1 Cost

Initial capital and net present costs associated with installing and operating wet cooling towers at MGS are summarized in Table H–1. Annualized costs based on 20-year average values for the various cost elements are summarized in Table H–2.

Cost category	Cost (\$)	Cost per MWh (rated capacity) (\$/MWh)	Cost per MWh (2006 output) (\$/MWh)
Total capital and start-up ^[a]	55,400,000	14.71	177
NPC ₂₀ ^[b]	61,200,000	16.24	196

Table H-1. Cumulative Cost Summary

[a] Includes all costs associated with the cooling tower construction and installation and shutdown loss, if any. [b] NPC_{20} includes all capital costs, operation and maintenance costs, and energy penalty costs over 20 years discounted at 7 percent.

Cost category	Cost (\$)	Cost per MWh (capacity) (\$/MWh)	Cost per MWh (2006 output) (\$/MWh)
Capital and start-up	5,200,000	1.38	16.65
Operations and maintenance	300,000	0.08	0.96
Energy penalty	300,000	0.08	0.96
Total MGS annual cost	5,800,000	1.54	18.57

Table H-2. Annual Cost Summary

1.2 ENVIRONMENTAL

Environmental changes associated with a cooling tower retrofit for MGS are summarized in Table H–3 and discussed further in Section 3.4.

		Unit 1	Unit 2		
	Design intake volume (gpm)	83,700	83,700		
Water use	Cooling tower makeup water (gpm)	4,600	4,600		
	Reduction from capacity (%)	95	95		
	Summer heat rate increase (%)	0.43	0.43		
Energy	Summer energy penalty (%)	1.34	1.34		
efficiency ^[a]	Annual heat rate increase (%)	0.73	0.73		
	Annual energy penalty (%)	1.64	1.64		
Direct air	PM ₁₀ emissions (tons/yr) (maximum capacity)	48	48		
emissions ^[b]	PM ₁₀ emissions (tons/yr) (2006 capacity utilization)	3.79	4.19		

Table H–3. Environmental Summary

[a] Reflects the comparative increase between once-through and wet cooling systems, but does not account for any operational changes to address the change in efficiency, such as increased fuel consumption (see Section 4.6).

[b] Reflects emissions from the cooling tower only; does not include any increase in stack emissions.

1.3 OTHER POTENTIAL FACTORS

Considerations outside this study's scope may limit the practicality or overall feasibility of a wet cooling tower retrofit at Mandalay.

MGS may face wastewater discharge permit conflicts upon converting to wet cooling towers. Recent permit compliance history indicates effluent exceedances have occurred for some metals, principally copper, as a result of elevated levels in the intake water. If cooling tower makeup water is obtained from the current source (Channel Islands Harbor), compliance may become more difficult as a result of a wet cooling tower's concentrating effects on certain pollutants, particularly metals. These conflicts may be mitigated or eliminated through the use of reclaimed water as the makeup source.

2.0 BACKGROUND

MGS is a natural gas-fired steam electric generating facility located in the city of Oxnard, Ventura County, owned and operated by Reliant Energy, Inc. MGS currently operates two conventional steam turbine units (Units 1 and 2) and one gas combustion turbine unit (Unit 3) with a combined generating capacity of 560 MW. Unit 3 does not require cooling water and is used infrequently. For the purposes of this study, only Units 1 and 2 are considered, with a combined generating capacity of 230 MW. The facility occupies approximately 128 acres of a 205-acre industrial site south of McGrath State Beach on the Pacific Ocean, approximately 3.5 miles northwest of Channel Islands Harbor. (See Table H–4 and Figure H–1.)

Unit	In-service year	Rated capacity (MW)	2006 capacity utilization ^[a]	Condenser cooling water flow (gpm)
Unit 1	1959	215	7.80%	83,700
Unit 2	1959	215	8.60%	83,700
MGS total		430	8.2%	167,400

[a] Quarterly Fuel and Energy Report-2006 (CEC 2006).



Figure H-1. General Vicinity of Mandalay Generating Station



2.1 COOLING WATER SYSTEM

MGS operates one cooling water intake structure (CWIS) to provide condenser cooling water to Units 1 and 2 (Figure H–2). Once-through cooling water is combined with low volume wastes generated by MGS and discharged through a single shoreline outfall to the Pacific Ocean. Surface water withdrawals and discharges are regulated by National Pollutant Discharge Eliminations System (NPDES) Permit CA0001180 as implemented by Los Angeles Regional Water Quality Control Board (LARWQCB) Order 01-057.¹



Figure H-2. Site View

Cooling water is obtained from Channel Islands Harbor via the Edison Canal, a 2.5 mile manmade canal specifically constructed to provide cooling water to the station.

The Edison Canal was originally connected to Port Hueneme, located approximately 4.5 miles southeast of MGS, but was disrupted by the construction of the harbor in 1965, which largely consisted of expanding the existing Edison Canal for a marina and a new outlet to the Pacific Ocean. As a result, it is difficult to determine what constitutes the boundary between the Edison Canal and Channel Islands Harbor. Based on the Phase II rule, it is not entirely clear whether the source water for MGS is the harbor or the Pacific Ocean. For the purposes of this study, the harbor is referenced as the source water and the CWIS defined as the portion of Edison Canal extending northward from the West Channel Islands Boulevard overpass up to and including the intake screens at the facility.



¹ LARWQCB Order #01-057 expired on May 10, 2006 but has been administratively extended pending adoption of a renewed order.

In addition to the Edison Canal, the CWIS comprises two angled intake bays, each approximately 12 feet wide. Each bay is fitted with a pair of vertical slide screens 11.5 feet wide by 21 feet high with ¹/₂-inch mesh panels and arranged parallel to each other (one in front of the other). Screens are alternately removed from the water and cleaned with a high pressure spray to remove any debris or fish that have become impinged on the screen face. Captured debris is collected in a dumpster for disposal in a landfill. MGS reports the approach velocity to the screens as 1.4 feet per second (fps), which translates to an approximate through-screen velocity of 2.8 fps.

Downstream of each screen is a circulating water pump rated at 44,000 gallons per minute (gpm), for a total facility capacity of 176,000 gpm, or 254 million gallons per day (mgd) (Reliant 2005). The majority of the cooling water is directed to the condensers, with a small portion used for bearing cooling water.

At maximum capacity, MGS maintains a total pumping capacity rated at 254 mgd, with a combined condenser flow rating of 241 mgd. On an annual basis, MGS withdraws substantially less than its design capacity due to its low generating capacity utilization (8.3 percent for 2006). When in operation and generating the maximum load, MGS can be expected to withdraw water from the Channel Islands Harbor at a rate approaching its maximum capacity.

2.2 SECTION 316(B) PERMIT COMPLIANCE

The CWIS currently in operation at MGS does not use technologies generally considered to be effective at reducing impingement mortality and/or entrainment. LARWQCB Order 01-057, adopted in 2001, states that "the design, construction and operation of the intake structures [at MGS] represents Best Available Technology (BAT) [*sic*] as required by Section 316(b) of the Clean Water Act" (LARWQCB, 2001. Finding 15). The order does not contain any numeric or narrative limitations regarding impingement or entrainment resulting from CWIS operation, but does require semi-annual monitoring of impingement at each intake structure (coinciding with scheduled heat treatments). Based on the record available for review, MGS has been compliant with this permit requirement.

The LARWQCB has notified MGS of its intent to revisit requirements under CWA Section 316(b), including a determination of BTA for minimization of adverse environmental impact, during the current permit re-issuance process. A final decision regarding any Section 316(b)-related requirements has not been made as of the publication of this study.

3.0 WET COOLING SYSTEM RETROFIT

3.1 OVERVIEW

This study evaluates saltwater cooling towers as a retrofit option at MGS, with the current source water (Channel Islands Harbor) continuing to provide makeup water to the facility. Converting the existing once-through cooling system to wet cooling towers will reduce the facility's current intake capacity by approximately 95 percent; rates of impingement and entrainment will decline by a similar proportion. Use of reclaimed water was considered for MGS but not analyzed in detail because the available volume cannot serve as a replacement for once-through cooling



water. The proximity of available sources, however, may make reclaimed water an attractive alternative as makeup water for a wet cooling tower system when considering additional benefits its use may provide, such as avoidance of conflicts with effluent limitations or air emission standards.

The wet cooling towers' configuration—their size, arrangement, and location—was based on best professional judgment (BPJ) using the criteria outlined in Chapter 5 and designed to meet the performance benchmarks in the most cost-effective manner. Information not available to this study that offers a more complete facility characterization may lead to different conclusions regarding the cooling towers' physical configuration.

This study developed a conceptual design of wet cooling towers sufficient to meet each active generating unit's cooling demand at its rated output during peak climate conditions. Cost estimates are based on vendor quotes developed using the available information and the various design constraints identified at MGS.

The overall practicality of retrofitting both units at MGS will require an evaluation of factors outside the scope of this study, such as each unit's age and efficiency and its role in the overall reliability of electricity production and transmission in California, particularly the Los Angeles Region.

3.2 DESIGN BASIS

3.2.1 CONDENSER SPECIFICATIONS

For this study, the wet cooling tower conceptual design selected for MGS is based on the assumption that the condenser flow rate and thermal load to each will remain unchanged from the current system. Although no provision is included to re-optimize the condenser performance for service with a cooling tower, some modifications to the condenser (tube sheet and water box reinforcement) may be necessary to handle the increased water pressures that will result from the increased total pump head required to raise water to the cooling tower riser elevation.² The practicality and difficulty of these modifications are dependent each unit's age and configuration but are assumed to be feasible at MGS. Condenser water boxes for both units are located at grade level and appear to be readily accessible. Additional costs for condenser modifications are included in the discussion of capital expenditures (Section 4.0).

Information provided by MGS was largely used as the basis for the cooling tower design. In some cases, the data were incomplete or conflicted with values obtained from other sources. Where possible, questionable values were verified or corrected using other known information about the condenser.

Parameters used in the development of the cooling tower design are summarized in Table H–5.



² In this context, re-optimization refers to a comprehensive condenser overhaul that reduces thermal efficiency losses associated with a wet cooling tower's higher circulating water temperatures. Modifications discussed in this study are generally limited to reinforcement measures that enable the condenser to withstand increased water pressures.

	Unit 1	Unit 2
Thermal load (MMBTU/hr)	920.7	920.7
Surface area (ft ²)	110,000	110,000
Condenser flow rate (gpm)	83,700	83,700
Tube material	Aluminum brass	Aluminum brass
Heat transfer coefficient (BTU/hr•ft ² •°F)	560	560
Cleanliness factor	0.85	0.85
Inlet temperature (°F)	63	63
Temperature rise (°F)	22.01	22.01
Steam condensate temperature (°F)	91.7	91.7
Turbine exhaust pressure (in. HgA)	1.5	1.5

3.2.2 AMBIENT ENVIRONMENTAL CONDITIONS

MGS is located in Ventura County adjacent to Mandalay and the Pacific Ocean approximately 3.5 miles northwest of Channel Islands Harbor. Cooling water is withdrawn at the surface via the Edison Canal from the harbor, which opens to the Pacific Ocean. Inlet water temperatures are expected to be comparable to temperatures within the harbor. Data provided by MGS detailing monthly inlet temperatures contained gaps for some months when units were not operational. Surface water temperatures used in this analysis were supplemented with monthly average coastal water temperatures as reported in the NOAA *Coastal Water Temperature Guide for Ventura and Port Hueneme, CA* (NOAA 2007). A comparison between MGS and NOAA data indicates the inlet temperatures at MGS are typically a few degrees higher. Data obtained from NOAA sources have been adjusted accordingly.

The wet bulb temperature used in the development of the overall cooling tower design was obtained from American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) publications. Data for coastal Ventura County indicate a 1 percent ambient wet bulb temperature of 66° F (ASHRAE 2006). An approach temperature of 12° F was selected based on the site configuration and vendor input. At the design wet bulb and approach temperatures, the cooling towers will yield "cold" water at a temperature of 78° F.

Monthly maximum wet bulb temperatures used in the development of energy penalty estimates in Section 4.6 were calculated using data obtained from California Irrigation Management Information System (CIMIS) Monitoring Station 156 in Oxnard (CIMIS 2006). Climate data used in this analysis are summarized in Table H–6.



	Surface (°F)	Ambient wet bulb (°F)
January	57.0	57.9
February	59.3	58.3
March	62.6	59.7
April	65.1	60.7
Мау	68.4	62.5
June	71.2	65.3
July	74.4	66.1
August	74.0	66.3
September	71.4	64.7
October	66.2	62.4
November	62.5	61.3
December	56.9	58.9

Table H-6. Surface Water and Ambient Wet Bulb Temperatures

3.2.3 LOCAL USE RESTRICTIONS

3.2.3.1 Noise

Industrial development in the vicinity of MGS is covered by the City of Oxnard General Plan and the City of Oxnard Land Use Plan (LUP). General Plan Section 10 (Noise Element) outlines the broad policy related to noise impacts within the city's different development zones. The plan outlines narrative criteria to be used as a guide for future development, but does not identify numeric noise limits for new construction (Oxnard 2006).

Land use within the general vicinity of MGS is primarily agricultural, although recent residential developments have encroached upon the area. Noise associated with the cooling towers is not expected to have any discernible impact upon these areas. The proximity to state beaches, however, may conflict with recreational standards set forth in the Ventura County Local Coastal Plan, but again, no numeric limits are specified.

In lieu of specific noise criteria, this study used an ambient noise limit of 65 dBA at a distance of 700 feet in selecting the design elements of the wet tower installation. Accordingly, the final design selected for MGS does not require any measures that specifically address noise, such as low-noise fans or barrier walls.

3.2.3.2 BUILDING HEIGHT

MGS is located within the coastal energy facilities subzone (EC) of the City of Oxnard LUP, which encourages the expansion of energy-related activities within the existing site consistent with other plan provisions. The LUP does not establish specific criteria for building height and instead relies on conditional use permitting that evaluates each project independently. Given the



height of existing structures at MGS, this study selected a height restriction of 50 feet above grade level. The height of the wet cooling towers designed for MGS, from grade level to the top of the fan deck, is 44 feet.

3.2.3.3 PLUME ABATEMENT

Local zoning ordinances do not contain any specific criteria for addressing any impact associated with a wet cooling tower plume. Using the selection criteria for this study, plume abatement measures were not considered for MGS; all towers are a conventional design. The plume from wet cooling towers at MGS is not expected to adversely impact nearby infrastructure.

Community standards for assessing the visual impact associated with a cooling tower plume cannot be determined within the scope of this study. Agricultural uses predominate in the general vicinity of MGS, but residential development continues to encroach upon the facility. The proximity of MGS to coastal recreational areas (McGrath State Beach) and the potential visual impact on those resources may require plume abatement measures. CEC siting guidelines and Coastal Act provisions evaluate the total size and persistence of a visual plume with respect to aesthetic standards for coastal resources; significant visual changes resulting from a persistent plume would likely be subject to additional controls.

Plume abatement towers for MGS, if necessary, would be a feasible alternative given the relatively small size of the generating units and available land on which to locate them. The principal difference would be an escalation of the total cost (approximately 2 to 3 times the capital cost of conventional towers). The additional height required for plume-abated towers (approximately 15-20 feet) may conflict with height restrictions under local zoning ordinances, but this cannot be precisely determined.

3.2.3.4 DRIFT AND PARTICULATE EMISSIONS

Drift elimination measures that are considered best available control technology (BACT) are required for all cooling towers evaluated in this study, regardless of their location. State-of-the-art drift eliminators are included for each cooling tower cell at MGS, with an accepted efficiency of 0.0005 percent. Because cooling tower PM10 emissions are a function of the drift rate, drift eliminators are also considered BACT for PM10 emissions from wet cooling towers. This efficiency can be verified by a proper in situ test, which accounts for site-specific climate, water, and operating conditions. Testing based on the Cooling Tower Institute's Isokinetic Drift Test Code is required at initial start-up on only one representative cell of each tower for an approximate cost of \$60,000 per test, or approximately \$120,000 for both cooling towers at MGS (CTI 1994). This cost is not itemized in the final analysis and is instead included as part of the indirect cost estimate (Section 4.3).

3.2.3.5 FACILITY CONFIGURATION AND AREA CONSTRAINTS

The existing site's configuration and relative locations of the two generating units does not present any obvious challenges to identifying a location for wet cooling towers at the facility. As shown in Figure H–3, sufficient space exists in the facility's northern section. This area (Area 1) is currently unoccupied and lies approximately 700 feet south of McGrath Lake. The total size of this parcel, approximately 150,000 square feet, is sufficient to accommodate the two required cooling towers.



Figure H–3. Cooling Tower Siting Locations

3.3 CONCEPTUAL DESIGN

Based on the design constraints discussed above, two wet cooling towers were selected to replace the current once-through cooling system that serves Units 1 and 2 at MGS. Each unit will be served by an independently-functioning tower with separate pump houses and pumps. Both towers at MGS consist of conventional cells arranged in a multi-cell, inline configuration.

3.3.1 SIZE

Each tower is constructed over a concrete collection basin 4 feet deep. The basin is larger than the tower structure's footprint, extending an additional 2 feet in each direction. The concrete used for construction is suitable for saltwater applications. The principal tower material is fiberglass reinforced plastic (FRP), with stainless steel fittings. These materials are more resistant to the higher corrosive effects of saltwater.

The size of each tower is primarily based on the thermal load rejected to the tower by the surface condenser and a 12° F approach to the ambient wet bulb temperature. The flow rate through each condenser remains unchanged.

General characteristics of the wet cooling towers selected for MGS are summarized in Table H–7.



	Tower 1 (Unit 1)	Tower 2 (Unit 2)
Thermal load (MMBTU/hr)	920.7	920.7
Circulating flow (gpm)	83,700	83,700
Number of cells	7	7
Tower type	Mechanical draft	Mechanical draft
Flow orientation	Counterflow	Counterflow
Fill type	Modular splash	Modular splash
Arrangement	Inline	Inline
Primary tower material	FRP	FRP
Tower dimensions (I x w x h) (ft)	336 x 54 x 44	336 x 54 x 44
Tower footprint with basin (I x w) (ft)	348 x 66	348 x 66

Table H-7. Wet Cooling Tower Design

3.3.2 LOCATION

The initial site selection for each tower was based on the desire to locate each tower as close as possible to its respective generating unit to minimize the supply and return pipe distances and any increases in pump head and brake horsepower. Tower 1, serving Unit 1, is located at an approximate distance of 550 feet. Tower 2, serving Unit 2, is located at approximate distance of 800 feet. (Figure H–4).



Figure H-4. Cooling Tower Locations

3.3.3 PIPING

The main supply and return pipelines to and from both towers will be located underground and made of prestressed concrete cylinder pipe (PCCP) suitable for saltwater applications. These pipes are sized at 72 inches in diameter. Pipes connecting the condensers to the supply and return lines are made of FRP and placed above ground on pipe racks. Above-ground placement avoids the potential disruption that may be caused by excavation in and around the power block. The condensers at MGS are located at grade level, enabling a relatively straightforward connection.

All riser piping (extending from the foot of the tower to the level of water distribution) is constructed of FRP.

Potential interference with underground obstacles and infrastructure is a concern, particularly at existing sites that are several decades old and have been substantially modified or rebuilt in the interim. Avoidance of these obstacles is considered to the degree practical in this study. Associated costs are included in the contingency estimate and are generally higher than similar estimates for new facilities (Section 4.3).

Appendix B details the total quantity of each pipe size and type for MGS.

3.3.4 FANS AND PUMPS

Each tower cell uses an independent single-speed fan. The fan size and motor power are the same for each cell in each tower.

This analysis includes new pumps to circulate water between the condensers and cooling towers. Pumps are sized according to the flow rate for each tower, the relative distance between the towers and condensers, and the total head required to deliver water to the top of each cooling tower riser. A separate, multilevel pump house is constructed for each tower and sized to accommodate the motor control centers (MCCs) and appropriate electrical switchgear. The electrical installation includes all necessary transformers, cabling, cable trays, lighting, and lightning protection. A 50-ton overhead crane is also included to allow for pump servicing.

Fan and pump characteristics associated with wet cooling towers at MGS are summarized in Table H–8. The net electrical demand of fans and new pumps is discussed further as part of the energy penalty analysis in Section Table H–8.



_		Tower 1 (Unit 1)	Tower 2 (Unit 2)
	Number	7	7
Fans	Туре	Single speed	Single speed
T uno	Efficiency	0.95	0.95
	Motor power (hp)	211	211
	Number	2	2
Pumps	Туре	50% recirculating Mixed flow Suspended bowl Vertical	50% recirculating Mixed flow Suspended bowl Vertical
	Efficiency	0.88	0.88
	Motor power (hp)	1,023	1,023

Table H-8. Cooling Tower Fans and Pumps

3.4 ENVIRONMENTAL EFFECTS

Converting the existing once-through cooling system at MGS to wet cooling towers will significantly reduce the intake of seawater from Channel Islands Harbor and will presumably reduce impingement and entrainment by a similar proportion. Because closed-cycle systems will almost always result in condenser cooling water temperatures higher than those found in a comparable once-through system, wet towers will increase the operating heat rates at both of MGS's steam units, thereby decreasing the facility's overall efficiency. Additional power will also be consumed by the tower fans and circulating pumps.

Depending on how MGS chooses to address this change in efficiency, total stack emissions may increase for pollutants such as PM_{10} , SO_x , and NO_x , and may require additional control measures (e.g., electrostatic precipitation, flue gas desulfurization, and selective catalytic reduction) or the purchase of emission credits to meet air quality regulations. The availability of emission reduction credits (ERCs) and their associated cost was not evaluated as part of this study. Both factors, however, may limit the air emission compliance options available to MGS.

No control measures are currently available for CO_2 emissions, which will increase, on a perkWh basis, by the same proportion as any change in the heat rate. The towers themselves will constitute an additional source of PM_{10} emissions, the annual mass of which will largely depend on the capacity utilization rate for the generating units served by each tower.

If MGS retains its NPDES permit to discharge wastewater to the Pacific Ocean with a wet cooling tower system, it may have to address revised effluent limitations resulting from the substantial change in the discharge quantity and characteristics. Thermal impacts from the current once-through system, if any, will be minimized with a wet cooling system.



3.4.1 AIR EMISSIONS

MGS is located in the South Central Coast air basin. Air emissions are permitted by the Ventura County Air Pollution Control District (VCAPCD) (Facility ID 13).

Drift volumes are expected to be within the range of 0.5 gallons for every 100,000 gallons of circulating water in the towers. At MGS, this corresponds to a rate of approximately 0.84 gpm based on the maximum combined flow both two towers. Agricultural operations lie within 0.25 mile to the north and 0.75 mile to the east. Given the direction of prevailing winds (from the west) some drift may carry to these areas, but the impact is not likely to be significant.

Total PM₁₀ emissions from the MGS cooling towers are a function of the number of hours in operation, the overall water quality in the tower, and the evaporation rate of drift droplets prior to deposition on the ground. Makeup water at MGS will be obtained from the same source currently used for once-through cooling water (Channel Islands Harbor). This water is drawn through the harbor from the Pacific Ocean and is the same as marine water with respect to the total dissolved solids (TDS) concentration. At 1.5 cycles of concentration and assuming an initial TDS value of 35 parts per thousand (ppt), the water within the cooling towers will reach a maximum TDS level of roughly 53 ppt. Any drift droplets exiting the tower will have the same TDS concentration.

The cumulative mass emission of PM_{10} from MGS will increase as a result of the direct emissions from the cooling towers themselves. Stack emissions of PM_{10} , as well as SO_x , NO_x , and other pollutants, will increase due to the drop in fuel efficiency, although the cumulative increase will depend on actual operations and emission control technologies currently in use. Maximum drift and PM_{10} emissions from the cooling towers are summarized in Table H–9.³

Data summarizing the total facility emissions for these pollutants in 2005 are presented in Table H–10 (CARB 2005). In 2005, MGS operated at an annual capacity utilization rate of 7.1 percent. Using this rate, the additional PM_{10} emissions from the cooling towers would increase the facility total by approximately 7 tons/year, or 150 percent.⁴



³ This is a conservative estimate that assumes all dissolved solids present in drift droplets will be converted to PM₁₀. Studies suggest this may overestimate actual emission profiles for saltwater cooling towers (Chapter 4).
⁴ 2006 emission data are not currently available from the Air Resources Board website. For consistency, the

⁴ 2006 emission data are not currently available from the Air Resources Board website. For consistency, the comparative increase in PM10 emissions estimated here is based on the 2005 MGS capacity utilization rate instead of the 2006 rate presented in Table H-4. All other calculations in this chapter use the 2006 value.

	PM ₁₀ (lbs/hr)	PM₁₀ (tons/year)	Drift (gpm)	Drift (Ibs/hr)
Tower 1	11	48	0.42	209
Tower 2	11	48	0.42	209
Total MGS PM ₁₀ and drift emissions	22	96	0.84	418

Table H–9. Full Load Drift and Particulate Estimates

Table H–10. 2005 Emissions of SO_x, NO_x, PM_{10}

Pollutant	Tons/year
NO _x	9.1
SO _x	1.0
PM ₁₀	4.6

3.4.2 MAKEUP WATER

The volume of makeup water required by both cooling towers at MGS is the sum of evaporative loss and the blowdown volume required to maintain the circulating water in each tower at the design TDS concentration. Drift expelled from the towers represents an insignificant volume by comparison and is accounted for by rounding up evaporative loss estimates. Makeup water volumes are based on design conditions, and may fluctuate seasonally depending on climate conditions and facility operations. Wet cooling towers will reduce once-through cooling water withdrawals from Channel Islands Harbor by approximately 95 over the current design intake capacity.

	Tower circulating flow (gpm)	Evaporation (gpm)	Blowdown (gpm)	Total makeup water (gpm)
Tower 1	83,700	1,600	3,000	4,600
Tower 2	83,700	1,600	3,000	4,600
Total MGS makeup water demand	167,400	3,200	6,000	9,200

One circulating water pump, rated at 44,000 gpm, which is currently used to provide oncethrough cooling water to the facility, will be retained in a wet cooling system to provide makeup water to each cooling tower. The retained pump's capacity exceeds the makeup demand by approximately 34,000 gpm. Any excess capacity will be routed through a bypass conduit and returned to the wet well at a point located behind the intake screens. Recirculating the excess capacity in this manner reduces additional cost that would be incurred if new pumps were required while maintaining the desired flow reduction. The intake of new water, measured at the intake screens, will be equal to the cooling towers' makeup water demand. Figure H–5 presents a schematic of this configuration.

The existing once-through cooling system at MGS does not treat water withdrawn from Channels Islands Harbor, with the exception of screening for debris and larger organisms and periodic chlorination to control biofouling in the condenser tubes. Heat treatments are also periodically



used to control mussel growth on pipes and condenser tubes by raising the circulating water temperature to 125° F. Conversion to a wet cooling tower system will not interfere with chlorination or heat treatment operations.



Figure H–5. Schematic of Intake Pump Configuration

Makeup water will continue to be withdrawn from the Channels Islands Harbor.

The wet cooling tower system proposed for MGS includes water treatment for standard operational measures, i.e., corrosion inhibitors, biocides, and anti-scaling agents. An allowance for these additional chemical treatments is included in annual O&M costs. It is assumed that the current once-through cooling water quality will be acceptable for use in a seawater cooling tower (with continued screening and chlorination) and will not require any pretreatment to enable its use.

3.4.3 NPDES PERMIT COMPLIANCE

At maximum operation, wet cooling towers at MGS will result in an effluent discharge of 8.6 mgd of blowdown in addition to other in-plant waste streams—such as boiler blowdown, regeneration wastes, and cleaning wastes. These low volume wastes may add an additional 0.25 mgd to the total discharge flow from the facility. Unless an alternative discharge is considered, MGS will be required to modify its existing individual wastewater discharge (NPDES) permit.

Current effluent limitations for conventional and priority pollutants, as well as thermal discharge limitations, are contained in NPDES Permit CA0001180 as implemented by LAWRQCB Order 01-057. All wastewaters are discharged to the Pacific Ocean via a rock-lined canal at the



shoreline. The existing Order contains effluent limitations based on the 1997 Ocean Plan and the 1972 Thermal Plan.

MGS will be required to meet technology-based effluent limitations for cooling tower blowdown established under the Effluent Limitation Guidelines (ELGs) for Steam Electric Facilities (40 CFR 423.13(d)(1)). These ELGs set numeric limitations for chromium and zinc (0.2 mg/L and 1.0 mg/L, respectively) while establishing narrative criteria for priority pollutants (no detectable quantity). Because ELGs are technology-based limitations, mixing zones or dilution factors are not applicable when determining compliance; limits must be met at the point of discharge from the cooling tower prior to commingling with any other waste stream. ELGs for cooling tower blowdown target priority pollutants that are contributed by maintenance chemicals and do not apply when limits may be exceeded as a result of background concentrations or other sources. Further discussion can be found in Chapter 4, Section 3.6.

Conversion to wet cooling towers will alter the volume and composition of a facility's wastewater discharge because wet towers concentrate certain pollutants in the effluent waste stream. The cooling towers designed for MGS operate at 1.5 cycles of concentration, i.e., the blowdown discharge will contain a dissolved solids concentration 50 percent higher than the makeup water.

Changes to discharge composition may affect compliance with water quality objectives included in the Ocean Plan. If compliance with these objectives becomes problematic, alternative treatment or discharge methods may be necessary. Compliance may be achieved by altering the discharge configuration in such a way as to increase dilution (e.g., diffuser ports), or by seeking a mixing zone and dilution credits as permissible under the Ocean Plan. Alternately, some low volume waste streams (e.g., boiler blowdown, laboratory drains) may be diverted, with necessary permits, for treatment at a POTW.

MGS has had an ongoing issue due to elevated levels of copper present in the intake water withdrawn from the Edison Canal. Reliant Energy, Inc has argued that high levels of copper within Channel Islands Harbor and the Edison Canal are a result of other activities in the area and that MGS does not contribute copper, at any significant level, to the final discharge. The SWRCB agreed with the latter point, but rejected the appeal for permit relief, citing the Ocean Plan's definition of wastes as the "total discharge, of whatever origin" from the facility (SWRCB 2005). The SWRCB did note that MGS could modify its existing discharge structure to increase the level of dilution and thereby increase the monthly effluent limitations.

In addition to copper, data submitted by MGS in support of its NPDES renewal application demonstrates a reasonable potential to exceed effluent limitations for cadmium, chromium, and zinc (Reliant 2004). These assessments reflect the existing once-through cooling system and are primarily driven by the elevated concentrations of these pollutants detected in the intake water at MGS.

If more pollutant-specific treatment methods, such as filtration or precipitation technologies, become necessary to meet WQBELs, the initial capital cost may range from \$2 to \$5.50 per 1,000 gallons of treatment capacity, with annual costs of approximately \$0.5 per gallon of capacity, depending on the method of treatment (FRTR 2002). Hazardous material disposal fees and permits would further increase costs.



This evaluation did not include alternative discharge or effluent treatment measures in the conceptual design because the variables used to determine final WQBELs, which would be used to determine the type and scope of the desired compliance method, cannot be quantified here. Likewise, the final cost evaluation (Section 4.0) does not include any allowance for these possibilities.

Use of reclaimed water as the cooling tower makeup source has the potential to reduce or eliminate conflicts with effluent limitations.

Thermal discharge standards are based on narrative criteria established for coastal discharges under the Thermal Plan, which requires that existing discharges of elevated-temperature wastes comply with effluent limitations necessary to assure the protection of designated beneficial uses. The LARWQCB has implemented this provision by establishing a maximum discharge temperature of 106° F during normal operations in Order 01-057 (LARWQCB 2001). Information available for review indicates MGS has consistently been able to comply with this requirement. Because cooling tower blowdown will be taken from the "cold" side of the tower, conversion to a wet cooling system will significantly reduce the discharge temperature (to less than 80° F) and the size of any related thermal plume in the receiving water.

3.4.4 RECLAIMED WATER

Reclaimed or alternative water sources used in conjunction with wet cooling towers could eliminate all surface water withdrawals at MGS. Doing so would completely eliminate impingement and entrainment concerns, and might enable the facility to avoid possible effluent quality and permit compliance issues, depending on the quality of reclaimed water available for use. In addition, wet cooling towers using reclaimed water would be expected to have lower PM₁₀ emissions due to the lower TDS levels. The California State Water Resources Control Board (SWRCB), in 1975, issued a policy statement requiring the consideration of alternative cooling methods in new power plants, including reclaimed water, over the use of freshwater (SWRCB 1975). There is no similar policy regarding marine waters, but the clear preference of state agencies is to encourage alternative cooling methods, including reclaimed water, wherever possible.

The present volume of available reclaimed water within a 15-mile radius of MGS (50 mgd) does not meet the current once-through cooling demand; thus, reclaimed water is only applicable as a source of makeup water for a wet cooling tower system. This study did not pursue a detailed investigation of reclaimed water's use because the conversion of MGS's once-through cooling system to saltwater cooling towers meets the performance benchmarks for impingement and entrainment impact reductions discussed in the 2006 California Ocean Protection Council (OPC) Resolution on Once-Through Cooling Water (see Chapter 1).

To be acceptable for use as makeup water in cooling towers, reclaimed water must meet tertiary treatment and disinfection standards under California Code of Regulations (CCR) Title 22. If the reclaimed water is not treated to the required levels, MGS would be required to arrange for sufficient treatment, either onsite or at the source facility, prior to its use in the cooling towers.

An additional consideration for reclaimed water is the presence of any ammonia or ammoniaforming compounds in the reclaimed water. All the condenser tubes at MGS contain copper



alloys (aluminum brass) and can experience stress-corrosion cracking as a result of the interaction between copper and ammonia. Treatment for ammonia may include adding ferrous sulfate as a corrosion inhibitor or require ammonia-stripping towers to pretreat reclaimed water prior to use in the cooling towers (EPA 2001).

Four publicly owned treatment works (POTWs) were identified within a 15-mile radius of MGS, with a combined discharge capacity of 50 mgd. Figure H–6 shows the relative locations of these facilities to MGS.



Figure H–6. Reclaimed Water Sources

 City of Ventura Water Reclamation Facility (VWRF)—Ventura Discharge volume: 14 mgd Distance: 2.5 miles NW Treatment level: Tertiary

All wastewater at VWRF is treated to tertiary standards. Approximately 1.0 mgd is currently used for irrigation purposes in the vicinity. Facility staff indicated that demand is increasing as the area is developed and future uses may limit any capacity available to MGS as a makeup water source. Based on the current available capacity, however,

VWRF could provide most of the makeup water (5–8 mgd) for freshwater cooling towers at MGS.

 City of Oxnard Wastewater Treatment Plant—Oxnard Discharge volume: 31 mgd Distance: 4 miles SE Treatment level: Secondary

No information available. The existing capacity is sufficient to supply enough makeup water (5–8 mgd) for freshwater cooling towers at MGS, although arrangements for tertiary treatment would have to be made prior to its use.

Two other wastewater treatment plants—Ojai Valley and Santa Paula—lie within 10-15 miles of MGS. The combined capacity of these facilities (approximately 8 mgd) is equivalent to the total makeup demand required in freshwater towers at MGS, but would require transmission pipelines to all four facilities. If reclaimed water sources are pursued, the most practical options are the Ventura and Oxnard facilities.

The costs associated with installing transmission pipelines (excavation/drilling, material, labor), in addition to design and permitting costs, are difficult to quantify in the absence of a detailed analysis of various site-specific parameters that will influence the final configuration. The nearest facility with sufficient capacity to satisfy MGS's freshwater tower makeup demand (5–8 mgd) is located approximately 2.5 miles from the site (Ventura WRF). The area between the two facilities is not heavily developed. Installing a transmission pipeline would not face any significant obstacles in terms of infrastructure or right of way.

Based on data compiled for this study and others, the estimated installed cost of a 24-inch prestressed concrete cylinder pipe, sufficient to provide 8 mgd to MGS, is \$250 per linear foot, or approximately \$1.3 million per mile. Additional considerations, such as pump capacity and any required treatment, would increase the total cost.

Regulatory concerns beyond the scope of this investigation, however, may make reclaimed water (as a makeup water source) comparable or preferable to saltwater from the Pacific Ocean. Reclaimed water may enable MGS to eliminate potential conflicts with water discharge limitations or reduce PM10 emissions from the cooling tower, which is a concern given the South Coast air basin's current nonattainment status.

Use of freshwater (reclaimed water) as the makeup water source might enable MGS to avoid conflicts with effluent limitations that will likely result from installing wet cooling towers. The proximity of the Ventura WRF would appear to make this an attractive alternative combined with wet cooling towers, although MGS may choose to address effluent limitations in a different manner, such as pretreatment or discharge alteration (dilution).

At any facility where wet cooling towers are a feasible alternative, reclaimed water may be used as a makeup water source. The practicality of its use, however, depends on the overall cost, availability, and additional environmental benefit that may occur.



3.4.5 THERMAL EFFICIENCY

Wet cooling towers at MGS will increase the condenser inlet water temperature by a range of 3 to 16° F above the surface water temperature, depending on the ambient wet bulb temperature at the time. The generating units at MGS are designed to operate at the conditions described in Table H–12. The resulting monthly difference between once-through and wet cooling tower condenser inlet temperatures is described in Figure H–7.

	Unit 1	Unit 2
Design backpressure (in. HgA)	1.5	1.5
Design water temperature (°F)	63	63
Turbine inlet temp (°F)	1,050	1,050
Turbine inlet pressure (psia)	2,150	2,150
Full load heat rate (BTU/kWh) ^[a]	9,375	9,450

Table H-12. Design Thermal Conditions

[a] CEC 2002.



Figure H–7. Condenser Inlet Temperatures

Backpressures for the once-through and wet cooling tower configurations were calculated for each month using the design criteria described in the sections above and ambient climate data. In general, backpressures associated with the wet cooling tower were elevated by 0.3 to 0.8 inches HgA compared with the current once-through system (Figure H–8 and Figure H–10).

Heat rate adjustments were calculated by comparing the theoretical change in available energy that occurs at different turbine exhaust backpressures, assuming the thermal load and turbine inlet pressure remain constant, i.e., at the full load rating.⁵ The relative change at different backpressures was compared with the value calculated for the design conditions (i.e., at design turbine inlet and exhaust backpressures) and plotted as a percentage of the full load operating heat rate to develop estimated correction curves (Figure H–9 and Figure H–11).

The difference between the estimated once-through and closed-cycle heat rates for each month represents the approximate heat rate increase that would be expected when converting to wet cooling towers.

Table H–13 summarizes the annual average heat rate increase for each unit as well as the increase associated with the peak demand period of July-August-September. Monthly values were used to calculate the monetized value of these heat rate changes (Section 4.6). Month-by-month calculations are presented in Appendix A.

	Unit 1	Unit 2
Peak (July-August-September)	0.43%	0.43%
Annual average	0.73%	0.73%

Table H-13. Summary of Estimated Heat Rate Increases





Figure H-8. Estimated Backpressures (Unit 1)



Figure H-9. Estimated Heat Rate Correction (Unit 1)

⁵ Changes in thermal efficiency estimated for MGS are based on the design specifications provided by the facility. This may not reflect system modifications that might influence actual performance. In addition, the age of the units and the operating protocols used by MGS might result in different calculations.



Figure H-11. Estimated Heat Rate Correction (Unit 2)



Figure H-10. Estimated Backpressures (Unit 2)

4.0 RETROFIT COST ANALYSIS

The wet cooling system retrofit estimate for MGS is based on incorporating conventional wet cooling towers as a replacement for the existing once-through system for each unit. Standard cost elements for this project include the following:

- Direct (cooling tower installation, civil/structural, mechanical, piping, electrical, and demolition)
- Indirect (smaller project costs not itemized)
- Contingency (allowance for unknown project variables)
- Revenue loss from shutdown (net loss in revenue during construction phase)
- Operations and maintenance (non–energy related cooling tower operations)
- Energy penalty (includes increased parasitic use from fans and pumps as well as decreased thermal efficiency)

The cost analysis does not include allowances for elements that are not quantified in this study, such as land acquisition, effluent treatment, or air emission reduction credits. The methodology used to develop cost estimates is discussed in Chapter 5.

4.1 COOLING TOWER INSTALLATION

In general, the cooling tower configuration selected for MGS conforms to a typical design; no significant variations from a conventional arrangement were needed. Table H–14 summarizes the design-and-build cost estimate for each tower developed by vendors, inclusive of all labor and management required for their installation.

	Unit 1	Unit 2	MGS total
Number of cells	7	7	14
Cost/cell (\$)	571,429	571,429	571,429
Total MGS D&B cost (\$)	4,000,000	4,000,000	8,000,000

Table H-14. Wet Cooling Tower Design-and-Build Cost Estimate

4.2 OTHER DIRECT COSTS

A significant portion of wet cooling tower installation costs result from the various support structures, materials, equipment and labor necessary to prepare the cooling tower site and connect the towers to the condenser. At MGS, these costs comprise approximately 50 percent of the initial capital cost. Line item costs are detailed in Appendix B.

Deviations from or additions to the general cost elements discussed in Chapter 5 are discussed below. Other direct costs (non-cooling tower) are summarized in Table H–15.



- *Civil, Structural, and Piping* The MGS site configuration allows each tower to be located within relative proximity to the generating unit it services.
- Mechanical and Electrical

Initial capital costs in this category reflect the new pumps (four total) to circulate cooling water between the towers and condensers. No new pumps are required to provide makeup water from Channel Islands Harbor. Electrical costs are based on the battery limit after the main feeder breakers.

• *Demolition* No demolition costs are required.

	Equipment (\$)	Bulk material (\$)	Labor (\$)	MGS total (\$)
Civil/structural/piping	2,900,000	8,200,000	6,700,000	17,800,000
Mechanical	4,300,000	0	400,000	4,700,000
Electrical	1,100,000	1,500,000	1,100,000	3,700,000
Demolition	0	0	0	0
Total MGS other direct costs	8,300,000	9,700,000	8,200,000	26,200,000

Table H-15. Summary of Other Direct Costs

4.3 INDIRECT AND CONTINGENCY

Indirect costs are calculated as 25 percent of all direct costs (civil/structural, mechanical, electrical, demolition, and cooling towers).

An additional allowance is included for condenser water box and tube sheet reinforcement to withstand the increased pressures associated with a recirculating system. Each condenser may require reinforcement of the tube sheet bracing with 6-inch x 1-inch steel, and water box reinforcement/replacement with 5/8-inch carbon steel. Based on the estimates outlined in Chapter 5, a conservative estimate of 5 percent of all direct costs is included to account for possible condenser modifications.

The contingency cost is calculated as 25 percent of the sum of all direct and indirect costs, including condenser reinforcement. At MGS, potential costs in this category include relocating or demolishing small buildings and structures and potential interferences from underground structures.

Soils were not characterized for this analysis. MGS is situated at sea level adjacent to the Pacific Ocean. Seawater intrusion or the instability of sandy soils may require additional pilings to support any large structures built at the site. Initial capital costs are summarized in Table H–16.



	Cost (\$)
Cooling towers	8,000,000
Civil/structural/piping	17,800,000
Mechanical	4,700,000
Electrical	3,700,000
Demolition	0
Indirect cost	8,500,000
Condenser modification	1,700,000
Contingency	11,100,000
Total MGS capital cost	55,500,000

Table H-16. Summary of Initial Ca	pital Costs
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4.4 SHUTDOWN

A portion of the work relating to installing wet cooling towers can be completed without significant disruption to the operations of MGS. Units will be offline depending on the length of time it takes to integrate the new cooling system and conduct acceptance testing. For MGS, a conservative estimate of 4 weeks per unit was developed. Based on 2006 generating output, however, no shutdown is forecast for either unit. Therefore, the cost analysis for MGS does not include any loss of revenue associated with shutdown at MGS.

This analysis did not consider shutdown with respect to the required availability of a particular generating unit, nor can it automatically be assumed that the generating profile for 2006 will be the same in each subsequent year. Net output data from 2006 may not reflect any contractual obligations that mandate a particular unit's availability during a given time period.

4.5 OPERATIONS AND MAINTENANCE

Operations and maintenance (O&M) costs for a wet cooling tower system at MGS include routine maintenance activities; chemicals and treatment systems to control fouling and corrosion in the towers; management and labor; and an allowance for spare parts and replacement. Annual costs are calculated based on the combined tower flow rate using a base cost of \$4.00/gpm in Year 1 and \$5.80/gpm in Year 12, with an annual escalator of 2 percent (USEPA 2001). Year 12 costs increase based on the assumption that maintenance needs, particularly for spare parts and replacements, will be greater for years 12–20. Annual O&M costs, based on the design circulating water flow for the two cooling towers at MGS (167,400 gpm), are presented in Table H–17. These costs reflect maximum operation.

	Year 1 cost (\$)	Year 12 cost (\$)
Management/labor	167,400	242,730
Service/parts	267,840	388,368
Fouling	234,360	339,822
Total MGS O&M cost	669,600	970,920

Table H-17. Annual O&M Costs (Full Load)

4.6 ENERGY PENALTY

The energy penalty is divided into two components: increased parasitic use from the added electrical demand from tower fans and pumps; and the decrease in thermal efficiency from elevated turbine backpressures. Monetizing the energy penalty at MGS requires some assumption as to how the facility will choose to alter its operations to compensate for these changes, if at all. One option would be to accept the reduced amount of revenue-generating electricity available for sale and absorb the economic loss ("production loss option"). A second option would be to increase the firing rate to the turbine (i.e., consume more fuel) and produce the same amount of revenue-generating electricity as had been obtained with the once-through cooling system ("increased fuel option"). The degree to which a facility is able, or prefers, to operate at a higher firing rate, however, produces the more likely scenario—some combination of the two.

Ultimately, the manner in which MGS would alter operations to address efficiency changes is driven by considerations unknown to this study (e.g., corporate strategy, contractual obligations, operating protocols and turbine pressure tolerances). In all summary cost estimates, this study calculates the energy penalty's monetized value by assuming the facility will use the increased fuel option to compensate for reduced efficiency and generate the amount of electricity equivalent to the estimated shortfall. With this option, the energy penalty is equivalent to the financial cost of additional fuel and is nominally less costly than the production loss option. This option, however, may not reflect long-term costs such as increased maintenance or system degradation that may result from continued operation at a higher-than-designed turbine firing rate. ⁶

The energy penalty for MGS is calculated by first estimating the increased parasitic demand from the cooling tower pumps and fans, expressed as a percentage of each unit's rated capacity. Likewise, the change in the unit's heat rate is also expressed as a capacity percentage.

⁶ Increasing the firing rate will raise the water temperature exiting the condenser. The cooling towers are designed with a maximum water return temperature, typically 120° F. Depending on the system's operating conditions, a facility may be limited in the degree to which it can alter the thermal input without compromising the cooling tower's performance.



4.6.1 INCREASED PARASITIC USE (FANS AND PUMPS)

Depending on ambient conditions or the operating load at a given time, MGS may be able to take one or more cooling tower cells offline and still obtain the required level of cooling. This would also reduce the cumulative electrical demand from the fans. For the purposes of this study, however, operations are evaluated at the design conditions, i.e., full load; no allowance is made for seasonal changes. The increased electrical demand from cooling tower fan operation is summarized in Table H–18.

	Tower 1	Tower 2	MGS total
Units served	Unit 1	Unit 2	
Generating capacity (MW)	215	215	430
Number of fans (one per cell)	7	7	14
Motor power per fan (hp)	211	211	
Total motor power (hp)	1,474	1,474	2,947
MW total	1.10	1.10	2.20
Fan parasitic use (% of capacity)	0.51%	0.51%	0.51%

 Table H-18. Cooling Tower Fan Parasitic Use

Additional circulating water pump capacity for the wet cooling towers will also increase the parasitic electricity usage at MGS. Makeup water will continue to be withdrawn from the Pacific Ocean with one of the existing circulating water pumps; the remaining pumps will be retired.

The net increase in pump-related parasitic usage is the difference between the new wet cooling tower configuration (new plus retained pumps) and the existing once-through configuration. For calculation purposes, this study assumes full-load operation to estimate the cost of increased parasitic use. Final estimates, therefore, allocate the retained pump's electrical demand to each tower based on the proportion of the facility's generating capacity it services. Operating fewer towers or tower cells will alter the allocation of the retained pump's electrical demand, but not the total demand.

Because one of the main design assumptions maintains the existing flow rate through each condenser, the new circulating pumps are single speed and are assumed to operate at their full rated capacity when in use. The increased electrical demand associated with cooling tower pump operation is summarized in Table H–19.



	Tower 1	Tower 2	MGS total
Units served	Unit 1	Unit 2	
Generating capacity (MW)	215	215	430
Existing pump configuration (hp)	1,200	1,200	2,400
New pump configuration (hp)	2,345	2,345	4,691
Difference (hp)	1,145	1,145	2,291
Difference (MW)	0.9	0.9	1.7
Net pump parasitic use (% of capacity)	0.40%	0.40%	0.40%

	Table H-19.	Cooling Tower	Pump	Parasitic Use
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4.6.2 HEAT RATE CHANGE

Heat rate adjustments were calculated based on each month's ambient climate conditions and reflect the estimated difference between operations with once-through and wet cooling tower systems. As noted above, the energy penalty analysis assumes MGS will increase its fuel consumption to compensate for lost efficiency and the increased parasitic load from fans and pumps. The higher turbine firing rate will increase the thermal load rejected to the condenser, which, in turn, results in a higher backpressure value and corresponding increase in the heat rate. No data are available describing the changes in turbine backpressures above the design thermal loads. For the purposes of monetizing the energy penalty only, this study conservatively assumed an additional increase in the heat rate of 0.5 percent at the higher firing rate; the actual effect at MGS may be greater or less. Changes in the heat rate for each unit at MGS are presented in Figure H–12 and Figure H–13.







Figure H-13. Estimated Heat Rate Change (Unit 2)

4.6.3 CUMULATIVE ESTIMATE

Using the increased fuel option, the energy penalty's cumulative value is obtained by first calculating the relative costs of generation (\$/MWh) for the once-through system and the wet cooling system adjusted for a higher turbine firing rate. The cost of generation for MGS is based on the relative heat rates developed in Section 3.4.2 and the average monthly wholesale natural gas cost (\$/MMBTU) (ICE 2006a). The difference between these two values represents the monthly increased cost, per MWh, that results from converting to wet cooling towers. This value is then applied to the net MWh generated for the each month and summed to calculate the annual cost.

Based on 2006 output data, the Year 1 energy penalty for MGS will be approximately \$162,000 million. In contrast, the energy penalty's value calculated with the production loss option would be approximately \$303,000 million. Together, these values represent the range of potential energy penalty costs for MGS. Table H–20 and Table H–21 summarize the energy penalty estimates for each unit using the increased fuel option.

	Fuel cost	Once-through system		Wet towers w/ in	creased firing	Difference	2006	Net cost
Month	(\$/MMBTU)	Heat rate (BTU/kWh)	Cost (\$/MWh)	Heat rate (BTU/kWh)	Cost (\$/MWh)	(\$/MWh)	output (MWh)	(\$)
January	6.00	9,352	56.11	9,489	56.93	0.82	0	0
February	5.50	9,359	51.47	9,491	52.20	0.73	1,178	854
March	4.75	9,372	44.52	9,498	45.12	0.60	4,873	2,927
April	4.75	9,385	44.58	9,504	45.14	0.57	2,938	1,664
Мау	4.75	9,406	44.68	9,514	45.19	0.51	19,809	10,165
June	5.00	9,428	47.14	9,531	47.66	0.52	18,842	9,747
July	6.50	9,456	61.46	9,536	61.99	0.52	67,427	35,310
August	6.50	9,452	61.44	9,538	62.00	0.56	14,628	8,156
September	4.75	9,429	44.79	9,527	45.25	0.46	18,623	8,659
October	5.00	9,391	46.96	9,513	47.57	0.61	0	0
November	6.00	9,371	56.23	9,507	57.04	0.81	0	0
December	6.50	9,352	60.79	9,494	61.71	0.92	0	0
	•					•	Unit 1 total	77,482

Table H–20. Unit 1 Energy Pe	enalty-Year 1
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	Fuel cost	Once-through	n system	Wet towers w/ in	creased firing	Difference	2006	
Month	(\$/MMBTU)	Heat rate (BTU/kWh)	Cost (\$/MWh)	Heat rate (BTU/kWh)	Cost (\$/MWh)	(\$/MWh)	output (MWh)	Net cost (\$)
January	6.00	9,427	56.56	9,564	57.39	0.82	0	0
February	5.50	9,434	51.89	9,567	52.62	0.73	0	0
March	4.75	9,447	44.87	9,574	45.48	0.61	0	0
April	4.75	9,460	44.93	9,580	45.50	0.57	0	0
Мау	4.75	9,481	45.04	9,590	45.55	0.52	17,699	9,153
June	5.00	9,503	47.52	9,607	48.04	0.52	17,322	9,030
July	6.50	9,531	61.95	9,613	62.48	0.53	69,334	36,592
August	6.50	9,528	61.93	9,614	62.49	0.56	22,641	12,722
September	4.75	9,505	45.15	9,603	45.62	0.47	37,003	17,339
October	5.00	9,466	47.33	9,590	47.95	0.62	0	0
November	6.00	9,446	56.68	9,583	57.50	0.82	0	0
December	6.50	9,427	61.28	9,570	62.20	0.93	0	0
Unit 2 total								84,836

Table H-21. Unit 2 Energy Penalty–Year 2

4.7 NET PRESENT COST

The Net Present Cost (NPC) of a wet cooling system retrofit at MGS is the sum of all annual expenditures over the project's 20-year life span discounted according to the year in which the expense is incurred and the selected discount rate. The NPC represents the total change in revenue streams, in 2007 dollars, that MGS can expect over 20 years as a direct result of converting to wet cooling towers. The following values were used to calculate the NPC at a 7 percent discount rate:

- *Capital and Start-up*. Includes all capital, indirect, contingency, and shutdown costs. All costs in this category are incurred in Year 0. (See Table H–16.)
- Annual O&M. Base cost values for Year 1 and Year 12 are adjusted for subsequent years using a 2 percent year-over-year escalator. Because MGS has a relatively low capacity utilization factor, O&M costs for the NPC calculation were estimated at 35 percent of their maximum value. (See Table H–17.)
- Annual Energy Penalty. Insufficient information is available to this study to forecast future generating output at MGS. In lieu of annual estimates, this study uses the net MWh output from 2006 as the calculation basis for Years 1 through 20. Wholesale prices include a year-over-year price escalator of 5.8 percent (based on the Producer Price Index). The energy penalty values are based on the increased fuel option discussed in Section 4.6. (See Table H–20 and Table H–21.)

Using these values, the NPC_{20} for MGS is \$61 million. Appendix C contains detailed annual calculations used to develop this cost.

4.8 ANNUAL COST

The annual cost incurred by MGS for a wet cooling tower retrofit is the sum of annual amortized capital costs plus the annual average of O&M and energy penalty expenditures. Capital costs are amortized at a 7 percent discount rate over 20 years. O&M and energy penalty costs are calculated in the same manner as for the NPC₂₀ (Section 4.7). Revenue losses from a construction-related shutdown, if any, are incurred in Year 0 only and not included in the annual cost summarized in Table H–22.

Discount	Capital Cost	Annual O&M	Annual energy penalty	Annual cost
rate	(\$)	(\$)	(\$)	(\$)
7.00%	5,200,000	300,000	300,000	5,800,000

Table	H-22.	Annual	Cost
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4.9 COST-TO-GROSS REVENUE COMPARISON

Limited financial data are available to conduct a detailed analysis of the economic impact that a wet cooling system retrofit will have on MGS's annual revenues. The facility's gross annual revenue can be approximated using 2006 net generating data (CEC 2006) and average wholesale prices for electricity as recorded at the SP 15 trading hub (ICE 2006b). This estimate, therefore, does not reflect any changes that may result from different wholesale prices or contract agreements that may increase or decrease the gross revenue summarized below, nor does it account for annual fixed revenue requirements or other variable costs.

The estimate of gross annual revenue from electricity sales at MGS is a straightforward calculation that multiplies the monthly wholesale cost of electricity by the amount generated for the particular month. The estimated gross revenue for MGS is summarized in Table H–23. A comparison of annual costs to annual gross revenue is summarized in Table H–24.



	Wholesale price	(84)4/6		Estin	Estimated gross revenue (\$)			
_	(\$/MWh)	Unit 1	Unit 2	Unit 1	Unit 2	MGS total		
January	66	0	0	0	0	0		
February	61	1,178	0	71,858	0	71,858		
March	51	4,873	0	248,523	0	248,523		
April	51	2,938	0	149,838	0	149,838		
Мау	51	19,809	17,699	1,010,259	902,649	1,912,908		
June	55	18,842	17,322	1,036,310	952,710	1,989,020		
July	91	67,427	69,334	6,135,857	6,309,394	12,445,251		
August	73	14,628	22,641	1,067,844	1,652,793	2,720,637		
September	53	18,623	37,003	987,019	1,961,159	2,948,178		
October	57	0	0	0	0	0		
November	66	0	0	0	0	0		
December	67	0	0	0	0	0		
MGS	total	148,318	163,999	10,707,508	508 11,778,705 22,486,2			

Table H-23. Estimated Gross Revenue

Table H-24. Cost-Revenue Comparison

Estimated gross annual	Initial ca	Initial capital		O&M		Energy penalty		Total annual cost	
revenue (\$)	Cost (\$)	% of gross	Cost (\$)	% of gross	Cost (\$)	% of gross	Cost (\$)	% of gross	
22,500,000	5,200,000	23	300,000	1.3	300,000	1.3	5,800,000	26	

5.0 OTHER TECHNOLOGIES

Within the scope of this study, and using the OPC resolution's stated goal of reducing impingement and entrainment by 90–95 percent as a benchmark, the effectiveness of other technologies commonly used to address such impacts could not be conclusively determined for use at MGS. As with many existing facilities, the site's location and configuration complicate the use of some technologies that might be used successfully elsewhere. A more detailed analysis that also comprises a biological evaluation may determine the applicability of one or more of these technologies to MGS. A brief summary of these technologies' applicability follows.

5.1 MODIFIED RISTROPH SCREENS—FINE MESH

The principal concern with this technology is the successful return of viable organisms captured on the screens to the source water body. MGS currently withdraws its cooling water from Channel Islands Harbor. Returning any collected organisms to the harbor would be problematic because there is a high likelihood of reimpingement due to the flow patterns within the harbor and canal. There is also a question as to the long-term viability of fragile organisms (eggs and larvae) transported over the long distance from the facility to the harbor. Discharging organisms to the Pacific Ocean is not an option because many harbor species would be expected among the impinged organisms and may not survive in the open ocean. Successful deployment of this technology might be feasible with a better understanding of the biological conditions in Channel Islands Harbor and a detailed evaluation of a proposed return system.

5.2 BARRIER NETS

Placement of a barrier net at the entrance to the Edison Canal (West Channel Islands Boulevard) is not possible due to the likely conflicts with other uses of the marina. A barrier net could conceivably be placed at some distance closer to MGS without interfering with recreational boating and address impingement concerns. Barrier nets are ineffective as an entrainment reduction technology, however, and are not evaluated further in this study.

5.3 AQUATIC FILTRATION BARRIERS

Aquatic filtration barriers (AFBs) require large areas of relatively clean, low turbulence water in which to function properly. To protect the Edison Canal, MGS would require an AFB approximately 14,000 square feet in total area. The lack of sufficient cross currents at any potential location within the harbor would exacerbate any difficulties in keeping the material clean. The lack of available space within Channel Islands Harbor precludes the use of AFBs at MGS.

5.4 VARIABLE SPEED DRIVES

Variable speed drives (VSDs) were not considered for analysis at MGS because the technology alone cannot be expected to achieve the desired level of reductions in impingement and entrainment, nor could it be combined with another technology to yield the desired reductions.



Pumps that have been retrofitted with VSDs can reduce overall flow intake volumes by 10 to 50 percent over the current once-through configuration (USEPA 2001). The actual reduction, however, will vary based on the cooling water demand at different times of the year. At peak demand, the pumps will essentially function as standard circulating water pumps and withdraw water at the maximum rated capacity, thus negating any potential benefit. Use of VSDs may be an economically desirable option when pumps are retrofitted or replaced for other reasons, but they were not considered further for this study.

5.5 CYLINDRICAL FINE MESH WEDGEWIRE

Fine-mesh cylindrical wedgewire screens have not been deployed or evaluated at open coastal facilities for applications as large as would be required at MGS (approximately 250 mgd). To function as intended, cylindrical wedgewire screens must be submerged in a water body with a consistent ambient current of 0.5 feet per second (fps). Ideally, this current would be unidirectional so that screens may be oriented properly, and any debris impinged on the screens will be carried downstream when the airburst cleaning system is activated.

Fine-mesh wedgewire screens for MGS would be located offshore in the Pacific Ocean, west of the facility. Limited information regarding the subsurface currents in the near-shore environment near MGS is available. Data suggest that these currents are multidirectional, depending on the tide and season, and fluctuate in terms of velocity, with prolonged periods below 0.5 fps (SCCOOS 2006). To attain sufficient depth (approximately 20 feet) and an ambient current that might allow deployment, screens would need to be located 2,000 feet or more offshore. Discussions with vendors who design these systems indicated that distances over 1,000 to 1,500 feet become problematic due to the airburst system's inability to maintain adequate pressure for sufficient cleaning (Someah 2007). Together, these considerations preclude further evaluation of fine-mesh cylindrical wedgewire screens at MGS.



6.0 REFERENCES

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		Unit 1 Unit 2					
		Once through	Closed cycle	Net increase	Once through	Closed cycle	Net increase
JAN	Backpressure (in. HgA)	1.26	1.98	0.72	1.26	1.98	0.72
5AN	Heat rate ∆ (%)	-0.24	0.71	0.95	-0.24	0.71	0.95
FEB	Backpressure (in. HgA)	1.35	1.99	0.64	1.35	1.99	0.64
TEB	Heat rate ∆ (%)	-0.17	0.73	0.90	-0.17	0.73	0.90
MAR	Backpressure (in. HgA)	1.48	2.04	0.56	1.48	2.04	0.56
in/u (Heat rate ∆ (%)	-0.03	0.81	0.84	-0.03	0.81	0.84
APR -	Backpressure (in. HgA)	1.59	2.07	0.49	1.59	2.07	0.49
	Heat rate ∆ (%)	0.10	0.87	0.77	0.10	0.87	0.77
MAY	Backpressure (in. HgA)	1.74	2.14	0.40	1.74	2.14	0.40
	Heat rate ∆ (%)	0.33	0.98	0.65	0.33	0.98	0.65
JUN	Backpressure (in. HgA)	1.89	2.25	0.36	1.89	2.25	0.36
3014	Heat rate ∆ (%)	0.56	1.16	0.60	0.56	1.16	0.60
JUL	Backpressure (in. HgA)	2.07	2.28	0.21	2.07	2.28	0.21
002	Heat rate ∆ (%)	0.86	1.22	0.35	0.86	1.21	0.35
AUG	Backpressure (in. HgA)	2.04	2.29	0.24	2.04	2.29	0.24
AUG	Heat rate ∆ (%)	0.82	1.23	0.41	0.82	1.23	0.41
SEP	Backpressure (in. HgA)	1.90	2.22	0.32	1.90	2.22	0.32
JEI	Heat rate ∆ (%)	0.58	1.12	0.54	0.58	1.12	0.54
ост	Backpressure (in. HgA)	1.64	2.13	0.50	1.64	2.13	0.50
	Heat rate ∆ (%)	0.17	0.97	0.80	0.17	0.97	0.80
NOV	Backpressure (in. HgA)	1.47	2.10	0.62	1.47	2.10	0.62
	Heat rate ∆ (%)	-0.04	0.91	0.94	-0.04	0.90	0.94
DEC -	Backpressure (in. HgA)	1.26	2.01	0.75	1.26	2.01	0.75
	Heat rate ∆ (%)	-0.24	0.76	1.01	-0.24	0.76	1.01

Appendix A. Once-Through and Closed-Cycle Thermal Performance

Note: Heat rate delta represents change from design value calculated according to estimated ambient conditions for each month.



			Equipment		Bulk material		Labor			Total
Description	Unit	Qty	Unit price (\$)	Total price (\$)	Unit price (\$)	Total price (\$)	Unit (Mhr)	Rate (\$)	Total price (\$)	cost (\$)
CIVIL / STRUCTURAL / PIPING				-		-				-
Allocation for other accessories (bends, water hammers)	lot	1			500,000	500,000	4,000.00	85	340,000	840,000
Allocation for pipe racks (approx 800 ft) and cable racks	t	80			2,500	200,000	17.00	105	142,800	342,800
Allocation for sheet piling and dewatering	lot	1			500,000	500,000	5,000.00	100	500,000	1,000,000
Allocation for testing pipes	lot	1					2,000.00	95	190,000	190,000
Allocation for Tie-Ins to existing condenser's piping	lot	1			250,000	250,000	2,000.00	85	170,000	420,000
Allocation for trust blocks	lot	1			50,000	50,000	500.00	95	47,500	97,500
Backfill for PCCP pipe (reusing excavated material)	m3	14,174		-			0.04	200	113,392	113,392
Bedding for PCCP pipe	m3	2,340		-	25	58,500	0.04	200	18,720	77,220
Bend for PCCP pipe 24" diam (allocation)	ea	24		-	3,000	72,000	20.00	95	45,600	117,600
Bend for PCCP pipe 72" diam (allocation)	ea	30			18,000	540,000	40.00	95	114,000	654,000
Building architectural (siding, roofing, doors, paintingetc)	ea	2			57,500	115,000	690.00	75	103,500	218,500
Butterfly valves 24" c/w allocation for actuator & air lines	ea	8	28,000	224,000			50.00	85	34,000	258,000
Butterfly valves 30" c/w allocation for actuator & air lines	ea	14	30,800	431,200			50.00	85	59,500	490,700
Butterfly valves 48" c/w allocation for actuator & air lines	ea	4	46,200	184,800			50.00	85	17,000	201,800
Butterfly valves 54" c/w allocation for actuator & air lines	ea	8	60,900	487,200	-		55.00	85	37,400	524,600
Butterfly valves 72" c/w allocation for actuator & air lines	ea	12	96,600	1,159,200			75.00	85	76,500	1,235,700
Check valves 24"	ea	4	40,000	160,000	-		12.00	85	4,080	164,080
Check valves 48"	ea	4	66,000	264,000			24.00	85	8,160	272,160
Concrete basin walls (all in)	m3	298			225	67,050	8.00	75	178,800	245,850
Concrete elevated slabs (all in)	m3	322			250	80,500	10.00	75	241,500	322,000
Concrete for transformers and oil catch basin (allocation)	m3	200			250	50,000	10.00	75	150,000	200,000
Concrete slabs on grade (all in)	m3	1,662			200	332,400	4.00	75	498,600	831,000
Ductile iron cement pipe 12" diam. for fire water line	ft	1,600			100	160,000	0.60	95	91,200	251,200

Appendix B. Itemized Capital Costs



	Unit	Qty	Equipment		Bulk	material	Labor			Total
Description			Unit price (\$)	Total price (\$)	Unit price (\$)	Total price (\$)	Unit (Mhr)	Rate (\$)	Total price (\$)	cost (\$)
Excavation and backfill for fire line & make-up (using excavated material for backfill except for bedding)	m3	6,418	-				0.08	200	102,688	102,688
Excavation for PCCP pipe	m3	21,788					0.04	200	174,304	174,304
Fencing around transformers	m	50			30	1,500	1.00	75	3,750	5,250
Flange for PCCP joints 30"	ea	14			2,260	31,640	16.00	95	21,280	52,920
Flange for PCCP joints 72"	ea	16			9,860	157,760	25.00	95	38,000	195,760
Foundations for pipe racks and cable racks	m3	190			250	47,500	8.00	75	114,000	161,500
FRP flange 24"	ea	24			1,419	34,056	40.00	85	81,600	115,656
FRP flange 30"	ea	42			1,679	70,524	50.00	85	178,500	249,024
FRP flange 54"	ea	24			5,835	140,038	80.00	85	163,200	303,238
FRP flange 72"	ea	8			20,888	167,101	200.00	85	136,000	303,101
FRP pipe 24" diam.	ft	600			95	56,760	0.30	85	15,300	72,060
FRP pipe 48" diam.	ft	160			331	52,976	0.70	85	9,520	62,496
FRP pipe 72" diam.	ft	1,400			851	1,191,960	1.20	85	142,800	1,334,760
Harness clamp 24" c/w external testable joint	ea	80			1,715	137,200	14.00	95	106,400	243,600
Harness clamp 72" c/w internal testable joint	ea	190			2,440	463,600	18.00	95	324,900	788,500
Joint for FRP pipe 24" diam.	ea	20			901	18,012	35.00	85	59,500	77,512
Joint for FRP PIPE 48" diam.	ea	12			1,300	15,600	75.00	85	76,500	92,100
Joint for FRP pipe 72" diam.	ea	45			3,122	140,481	200.00	85	765,000	905,481
PCCP pipe 24" dia. For make-up	ft	1,500			98	147,000	0.50	95	71,250	218,250
PCCP pipe 72" diam.	ft	3,500			507	1,774,500	1.30	95	432,250	2,206,750
Riser (FRP pipe 30" diam X40 ft)	ea	14			14,603	204,442	100.00	85	119,000	323,442
Structural steel for building	t	160			2,500	400,000	20.00	105	336,000	736,000
CIVIL / STRUCTURAL / PIPING TOTAL				2,910,400		8,228,101			6,653,994	17,792,495
ELECTRICAL										
4.16 kv cabling feeding MCC's	m	1,000			75	75,000	0.40	85	34,000	109,000
4.16kV switchgear - 4 breakers	ea	1	250,000	250,000			150.00	85	12,750	262,750
480 volt cabling feeding MCC's	m	500			70	35,000	0.40	85	17,000	52,000
480V Switchgear - 1 breaker 3000A	ea	2	30,000	60,000			80.00	85	13,600	73,600
Allocation for automation and control	lot	1			500,000	500,000	5,000.00	85	425,000	925,000
Allocation for cable trays and duct banks	m	1,000			75	75,000	1.00	85	85,000	160,000
Allocation for lighting and lightning protection	lot	1			75,000	75,000	750.00	85	63,750	138,750



	Unit		Equipment		Bulk material		Labor			Total
Description		Qty	Unit price (\$)	Total price (\$)	Unit price (\$)	Total price (\$)	Unit (Mhr)	Rate (\$)	Total price (\$)	cost (\$)
Dry Transformer 2MVA xxkV-480V	ea	2	100,000	200,000		-	100.00	85	17,000	217,000
Lighting & electrical services for pump house building	ea	2			50,000	100,000	500.00	85	85,000	185,000
Local feeder for 1200 HP motor 4160 V (up to MCC)	ea	4			40,000	160,000	150.00	85	51,000	211,000
Local feeder for 200 HP motor 460 V (up to MCC)	ea	14			18,000	252,000	150.00	85	178,500	430,500
Oil Transformer 10/13.33MVA xx-4.16kV	ea	2	190,000	380,000		-	150.00	85	25,500	405,500
Primary breaker(xxkV)	ea	4	45,000	180,000			60.00	85	20,400	200,400
Primary feed cabling (assumed 13.8 kv)	m	1,500			175	262,500	0.50	85	63,750	326,250
ELECTRICAL TOTAL				1,070,000		1,534,500			1,092,250	3,696,750
MECHANICAL										
Allocation for ventilation of buildings	ea	2	25,000	50,000			250.00	85	42,500	92,500
Cooling tower for unit 1	lot	1	4,000,000	4,000,000						4,000,000
Cooling tower for unit 2	lot	1	4,000,000	4,000,000						4,000,000
Overhead crane 50 ton in (in pump house) Including additional structure to reduce the span	ea	2	500,000	1,000,000			1,000.00	85	170,000	1,170,000
Pump 4160 V 1200 HP	ea	4	800,000	3,200,000			420.00	85	142,800	3,342,800
MECHANICAL TOTAL				12,250,000		0			355,300	12,605,300

Project	Capital/start-up	0 & M	Energy (\$		Total (\$)	Annual discount	Present value
year	(\$)	(\$)	Unit 1	Unit 1 Unit 2		factor	(\$)
0	55,400,000				55,400,000	1	55,400,000
1		234,360	77,482	84,836	396,678	0.9346	370,735
2		239,047	81,999	89,782	410,828	0.8734	358,817
3		243,828	86,780	95,016	425,624	0.8163	347,437
4		248,705	91,839	100,555	441,099	0.7629	336,514
5		253,679	97,193	106,418	457,290	0.713	326,047
6		258,752	102,859	112,622	474,234	0.6663	315,982
7		263,927	108,856	119,188	491,971	0.6227	306,351
8		269,206	115,202	126,137	510,545	0.582	297,137
9		274,590	121,919	133,490	529,999	0.5439	288,266
10		280,082	129,026	141,273	550,381	0.5083	279,759
11		285,684	136,549	149,509	571,741	0.4751	271,634
12		346,618	144,509	158,225	649,353	0.444	288,313
13		353,551	152,934	167,450	673,935	0.415	279,683
14		360,622	161,850	177,212	699,684	0.3878	271,338
15		367,834	171,286	187,544	726,664	0.3624	263,343
16		375,191	181,272	198,477	754,941	0.3387	255,698
17		382,695	191,841	210,049	784,584	0.3166	248,399
18		390,349	203,025	222,295	815,668	0.2959	241,356
19		398,156	214,861	235,254	848,271	0.2765	234,547
20		406,119	227,388	248,970	882,476	0.2584	228,032
Total							61,209,388

Appendix C. Net Present Cost Calculation