

**ADDENDUM TO SEPA DS/ADOPTION
FOR THE SATSOP COMBUSTION TURBINE PROJECT**

Pursuant to Chapter 463-47 WAC,
WAC 197-11-600 (3)(b), and (4)(c) and WAC 197-11-625

Addendum to the **SEPA DS/Adoption for the Satsop Combustion Turbine Project** (later known as Phase I) issued by the Energy Facility Site Evaluation Council (EFSEC); in response to a request to amend the Site Certification Agreement(SCA) for the Grays Harbor Energy Center (GHE) to accommodate the installation of General Electric’s (GE) Advanced Gas Path package in Combustion Turbine Units 1 and 2, which have been in operation since July 2008. The Advanced Gas Path is a GE equipment and software improvement to the combustion turbines, which would increase the facility efficiency and output. GHE currently consists of two combustion turbine generators, each nominally rated at 175 megawatts (MW) and a steam turbine generator rated at 300 MW, for a total plant rated capacity of 650 MW. The Advanced Gas Path package will increase the maximum output of each combustion turbine generator. Output varies based on ambient conditions, but according to GE engineering data, after the Advanced Gas Path package is installed, the output of each turbine will increase to 181.2 MW at 59 degrees F and 100% load.

Date of Addendum: November 17,2020

Date of Original DS/Adoption: January 1996

Description of New Information:

- The EFSEC Staff Memorandum (November 17, 2020), which evaluates the Certificate Holder’s request, to install the Advanced Gas Path package on Units 1 and 2, is incorporated by reference to this Addendum. The following is a summary of the new information discussed in the staff memo.
 - B.2 Air.
 - Air quality - A PSD minor modification application has been received and will be processed to address any potential air quality impacts from the addition of the Advanced Gas Path package.
 - Greenhouse gas emissions – The facility has an approved Greenhouse Gas Mitigation Plan which generally requires the certificate holder to mitigate potential carbon dioxide emissions from the facility that exceed a rate of 0.675 lb/kWh. The mitigation formula required by the existing greenhouse gas mitigation plan will apply to the additional potential greenhouse gas emissions resulting from the equipment upgrade. Revised GHG emissions mitigation payment calculations per the current approved GHG mitigation plan will be implemented at facility startup post construction.
 - B.3 Water use. The review identified that some additional water would be withdrawn from the Chehalis River for operation but the increase would be less than 3% of the total current withdrawal; and the total after installation would be within the existing permitted water withdrawal amounts.
 - B.7 Environmental Health. Equipment replacement will involve the use of more de minimis amounts of toxic or hazardous chemicals which are already covered in the existing site Spill Prevention, Control, and Countermeasure Plan and Dangerous Waste Management Procedure.

- B.6. Noise, B.8. Energy, and B.15. Transportation. Installation of the gas path package would occur during the annual maintenance outage and would not change the length of the 45 day outage.
- All background documents listed in part A of the EFSEC staff memorandum supporting this review are also incorporated by reference in this Addendum.

Proponent: Grays Harbor Energy LLC

Location of proposal: 401 Keys Road, Elma, WA 98541. The site is located in Grays Harbor County, Washington, on a 22-acre site within the 1,600-acre Satsop Development Park.

Mitigation: No mitigation has been identified.

Purpose of Addendum: The natural-gas fired combined cycle generating facility was authorized to be constructed in 1996 in the Site Certification Agreement (SCA) Amendment No. 2 (between the State of Washington and Grays Harbor Energy LLC) and was put into operation in July 2008. EFSEC currently regulates the facility. In August 2020, GHE submitted a request for an amendment to the SCA for GHE to accommodate the installation of GE's Advanced Gas Path package in Units 1 and 2¹. This amendment is subject to review under the State Environmental Policy Act (SEPA). EFSEC considered other environmental information generated since the original SEPA review in 1996: August 2020 SEPA checklist, data requests 1 and 2, and consultation with state agency subject matter experts. EFSEC reviewed the new information and analyzed whether there was new information indicating likely significant adverse environmental impacts not covered by the impacts and mitigation analyzed in the existing SEPA document.

Consistent with WAC 197-11-600 (3)(b)(i) and (ii) concerning when a proposal has been changed or there is new information following completion of SEPA review, EFSEC has determined that the current action (SCA amendment to install a Gas Path package to Units 1 and 2) triggering SEPA review involves minor changes to the operating facility and that the new information collected and reviewed as part of this SEPA review does not substantially change the analysis of significant impacts and alternatives in the existing environmental documents. Consistent with WAC 197-11-600 (4)(c), an addendum is appropriate for documenting this environmental review under SEPA.

Comment period: No comment period is required for an addendum.

The GHE Units 1 and 2 Gas Path package installation SEPA Addendum and supporting documentation can be found on EFSEC's website: <https://www.efsec.wa.gov/energy-facilities/grays-harbor-energy-center/grays-harbor-energy-center-sca>

¹ The Certificate Holder submitted one request for amendment to the SCA to: 1) upgrade Units 1 and 2 with the gas path package and 2) extend the deadline for commencing construction of Units 3 and 4 to 2028. EFSEC is separating the SEPA review for upgrading Units 1 and 2 from the request to extend the deadline for Units 3 and 4. This SEPA review applies to upgrading Units 1 and 2. SEPA review for extending the construction timeline for Units 3 and 4 will occur separately. Please see further discussion in the *Staff Memorandum, Part C. Applicable SEPA Rules*.

Name of agency: Energy Facility Site Evaluation Council
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Responsible Official: Sonia E. Bumpus, EFSEC Manager

Signature:  _____

Contact person: Amí Kidder
360-664-1305

Attachment: 11/17/2020 EFSEC Staff Memorandum to Sonia Bumpus from Amí Kidder