

DOCKETED

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Document Title:	Sacramento Cogeneration Authority - Procter & Gamble - Staff Response to Comments
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CALIFORNIA ENERGY COMMISSION

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June 26, 2015

Ross Gould
Manager, Thermal Generation and Pipeline Assets
Power Generation
Sacramento Municipal Utility District
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P.O. Box 15830, Sacramento, CA 95852-1830

**SUBJECT: SACRAMENTO COGENERATION AUTHORITY
PROCTER & GAMBLE, 93-AFC-2C**

**Staff Response to June 25, 2015 Comments on the Staff Analysis and
Amendment Proposal for the Sacramento Cogeneration Authority's
Procter and Gamble Cogeneration Project Auxiliary Boiler 1B Project**

Dear Mr. Gould:

Staff has reviewed the June 25, 2015 comments provided by Sacramento Cogeneration Authority on the Staff Analysis and Amendment Proposal for the Sacramento Cogeneration Authority's Procter and Gamble Cogeneration Project Auxiliary Boiler 1B Project.

Staff is in agreement with the suggested typographical and regulatory consistency corrections to be made to the Air Quality Analysis section of the Staff Analysis. Specifically, staff agrees with the proposed corrections to the air quality conditions of certification in this petition to amend.

- **AQ-AB18** the Verification section that reads, "At least sixty (30) days before . . ." It will be changed to "At least thirty (30) days before . . ."
- **AQ-AB23** requires that "[p]rior to *construction*, the permittee shall surrender sufficient ERCS to the SMAQMD . . ." (emphasis added); whereas, SMAQMD Rule 202, Section 408 requires that ERCS be surrendered prior to operation; therefore, AQ-AB23 will be revised to be consistent with the Rule 202 requirement. We understand that Sacramento Cogeneration Authority also requested that the SMAQMD change this provision in their draft permit.
- The **AQ-AB23** "Verification" section requires "recertification" of ERCS by the Feather River Air Quality Management District (FRAQMD) at least 30 days prior to the start of construction, but recertification as defined in FRAQMD Rule 10.9 will not occur for at least 6 months; therefore, the verification language will be revised as follows:

Verification: At least thirty (30) days prior to the start of ~~construction~~ operation, the facility owner shall provide to the CPM a copy of the signed recertification documentation from the Feather River Air Quality Management District demonstrating

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approval of the ERC transfer and documentation from the Sacramento Metropolitan Air Quality Management District demonstrating approval of the use of banking certificate (Certificate FRAQMD #99001-T2) has been validated and surrendered for the Auxiliary Boiler 1B Project.

Energy Commission staff will make these changes to the conditions of certification in the Order that will be considered for approval at the July 8, 2015 business meeting at the Energy Commission.

If you have any questions, please call me at (916) 651-8891, or send an e-mail to me at mary.dyas@energy.ca.gov.

Sincerely,



Mary Dyas
Compliance Project Manager
Siting, Transmission & Environmental Protection Division

cc: Energy Commission Docket Unit