

## DOCKETED

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**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Alana Mathews

DATE: September 16, 2016

FROM: Elaine Searcy, APCD

SUBJECT: Comments on Preliminary Staff Assessment for Proposed Puente Power Project (15-AFC-01), RMA Reference No. 16-018California Energy Commission

Ventura County Air Pollution Control District staff submits the following general comments on the proposed project, which is a proposal to construct, own and operate the Puente Power Project (P3). The 262-megawatt (MW) electric power project would be located on a 3-acre portion of the 36-acre Mandalay Generating Station (MGS) at 393 North Harbor Boulevard, Oxnard, Ventura County. The proposed project would be comprised of one gas-fired combustion turbine generator (CTG), a 188-foot exhaust stack, and miscellaneous improvements necessary to either extend or reuse existing site structures and utilities. The existing Mandalay Generating Station Units 1 and 2 will be decommissioned and, if P3 is built and becomes operational, the power blocks and exhaust structure will be demolished and removed. The existing MGS Unit 3 would continue to operate.

General Comments

- | <u>#</u> | <u>Page</u> | <u>Comment</u>   |
|----------|-------------|--|
| 1.       | 4.1-6       | <b>Existing Air Quality, second paragraph</b><br>The South Central Coast Air Basin includes the Ventura County, Santa Barbara County, and San Luis Obispo County, and each county has a separate air pollution control district. Attainment status may be different for each county within the air basin, so Air Quality Table 3 should show the attainment status for the county in which the project is proposed – Ventura County. |
| 2.       | 4.1.8       | <b>Air Quality Table 3</b><br>See comment above; table should be attainment status for Ventura County. Additionally, this table lists federal ozone attainment status as marginal, however, it does not say what standard the attainment status is for. Designations have not been made for the 2015 0.070 ppm national 8-hour ozone standard, and Ventura County is not Marginal for the 2008 national 8-hour ozone standard.       |
| 3.       | 4.1.8       | <b>Existing air quality, first paragraph</b><br>The first sentence (and subsequent references to the monitoring site) should be revised to read: The operation monitoring station closest to the proposed project site with long-term records for ozone, PM10, PM2.5 and NOx is the El Rio – Rio   |

Mesa School #2 (El Rio) monitoring site, which is located at Rio Mesa High School, seven miles northeast of the project site.

4. 4.1.8 **Existing air quality, first paragraph**  
Sox should be corrected to read SO<sub>x</sub>.
5. 4.1.8 **Ozone, first paragraph**  
References to SCCAB should be corrected to show the attainment status for Ventura County.
6. 4.1-8 **Air Quality Table 3**  
This table lists PDOC 2016 as a source, yet PDOC 2016 is not listed in the References on page 4.1-98.
7. 4.1-9 **Air Quality Table 4**  
This table lists ARB 2008 and ARB 2014c as sources, yet they are not listed in the References on page 4.1-98.

When I checked [www.arb.ca.gov/adam.select8/sc8start](http://www.arb.ca.gov/adam.select8/sc8start) to verify the values in the table, I found discrepancies between table data and the ARB ADAM data source.

Additionally, the table is missing year 2010.

For 1990, Days Above CAAQS 8-Hr, the value should be 16 (not 9).

The column Max 8-Hr Avg (ppm) appears to have federal maximum 8-hr averages instead of California maximum 8-hr averages (and per text on page 4.1-8, this table only includes data related compared to CAAQS).

8. 4.1-9 **Text paragraph**  
Instead of “AAQS exceedances,” since Table 4 only refers to CAAQS (per text on page 4.1-8), this sentence should refer to “CAAQS exceedances.”

Instead of referring to the “air basin” in this paragraph, it should refer to “Ventura County.”

9. 4.1-10 **Air Quality Figure 1**  
Although text on page 4.1-8 indicates that this figure is El Rio data compared to the California standards, this same information should be clear when looking at the figure as a stand-alone item.

In the title of the table, it should be reflected that the data is maximum daily average concentrations, not maximum concentrations.

Additionally, data should be actual data values (with units shown) by year, not

normalized concentrations, to be more understandable to the public.

It appears that the legend labels are reversed for the two data series – the red data series is the 8-hr ozone data, and the blue data series is the 1-hr ozone data.

This figure lists ARB 2015a as the source, but that is the ARB standards table, and that is not the source of the data.

10. 4.1-10 **Air Quality Figure 2**

Although text on page 4.1-8 indicates that this figure is El Rio data compared to the California standards, this same information should be clear when looking at the figure as a stand-alone item.

Data values that are corrected in Table 4 (see comment #7) should be reflected in Figure 2.

This figure lists ARB 2015a as one of the sources, but that is the ARB standards table, and that is not a source of the data.

11. 4.1-11 **Respirable Particulate Matter (PM10)**

References to SCCAB should be changed to Ventura County.

12. 4.1-12 **Air Quality Table 5**

Although text on page 4.1-11 indicates that this table is El Rio data compared to the California standards, this same information should be clear when looking at the table as a stand-alone item.

This table lists ARB 2008, VCAPCD 2016, and ARB 2014c as data sources, yet they are not listed in the References on page 4.1-98.

Additionally, the table is missing year 1997.

The column Days \* Above Daily CAAQS has values that are off by approximately a factor of 6, and should be corrected with estimated days above the standard from the California Air Resources Board.

The column entitled Max. Daily Avg. should have units listed.

When I checked [www.arb.ca.gov/adam.select8//sc8start](http://www.arb.ca.gov/adam.select8//sc8start) to verify the values in the table, I found discrepancies between table data and the ARB ADAM data source.

13. 4.1-13 **Air Quality Figure 4**

Although text on page 4.1-8 indicates that this figure is El Rio data compared to the California standards, this same information should be clear when looking at the

figure as a stand-alone item.

Additionally, data should be actual data values (with units shown) by year, not normalized concentrations, to be more understandable to the public.

This figure lists ARB 2015a as the source, but that is the ARB standards table, and that is not the source of the data.

14. 4.1-14 **Air Quality Figure 5**

Although text on page 4.1-8 indicates that this figure is El Rio data compared to the California standards, this same information should be clear when looking at the figure as a stand-alone item.

The data in this figure contains values that are off by approximately a factor of 6, and should be corrected with estimated days above the standard from the California Air Resources Board.

Data values that are corrected in Table 5 (see comment #12) should be reflected in Figure 5.

This figure lists ARB 2015a as the source, but that is the ARB standards table, and that is not the source of the data.

15. 4.1-14 **Fine Particulate Matter (PM<sub>2.5</sub>)**

SCCAB in this discussion should be changed to Ventura County.

Wood smoke particle discussion is not particularly relevant to the coastal region of the Oxnard Plain in Ventura County, and should be deleted.

The second sentence of the second paragraph should read "...of the federal and state standards" instead of "...that federal and state standards."

16. 4.1-14 **Air Quality Table 6**

The column entitled National Maximum Daily ( $\mu\text{g}/\text{m}^3$ ) should be changed to National Maximum Daily Average ( $\mu\text{g}/\text{m}^3$ )

The column entitled 98<sup>th</sup> Percentile Maximum Daily ( $\mu\text{g}/\text{m}^3$ ) should be changed to National 98<sup>th</sup> Percentile Maximum Daily Average ( $\mu\text{g}/\text{m}^3$ )

When I checked [www.arb.ca.gov/adam.select8//sc8start](http://www.arb.ca.gov/adam.select8//sc8start) to verify the values in the table, I found discrepancies between the State Annual Average ( $\mu\text{g}/\text{m}^3$ ) column and the ARB ADAM data source.

17. 4.1-16 **Air Quality Table 7**

It appears that at one point, this table broke onto two pages, as the column headings are repeated partway down the table.

18. 4.1-17 **Nitrogen Dioxide (NO<sub>2</sub>)**

Other pollutants have a section heading and discussion about the pollutant, however there is not a section for NO<sub>2</sub>.

19. 4.1.17 **Air Quality Table 8**

From year 2002 through year 2014, data is incorrect. It appears that 2002 data was omitted and year 2003 data inserted incorrectly for the year 2002 row, and all data is in the wrong row by one year.

20. 4.1-18 **Air Quality Table 9**

This table is missing year 2008.

21. 4.1-23 The second sentence in Phase 1 – Initial Commissioning should be revised to say Phase I instead of Phase II.

22. N/A **General comment about the data tables and figures**

It would be helpful if, in the tables, you listed the source of each column of data, if the data came from multiple sources, as was done for Table 9 of this document. This would make reviewing the data for accuracy much easier.

This air quality section relies heavily on comparison to the CAAQS in the tables and figures rather than the NAAQS. For pollutants such as PM<sub>10</sub>, where Ventura County is nonattainment only for the state standard, this seems reasonable. Comparison to the NAAQS should also be discussed, particularly with regard to ozone.

Furthermore, the tables and figures contain data from one monitoring site, which gives a very focused view of emissions in one specific location in Ventura County. Somewhere in this section there should be a discussion of the bigger Ventura County emissions picture (e.g., design values of the county relevant to each of the pollutants, numbers of exceedances countywide of the standards, etc.)

If you have questions regarding any of these comments, please contact me at 805-645-1426.