

DOCKETED

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Project Title:	Puente Power Project
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Document Title:	Air Quality FSA Workshop Presentation
Description:	FSA staff workshop presentations. The Biological Resources, Cultural Resources, Environmental Justice, Land Use, and Traffic and Transportation presentations were made, the others were not.
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California Energy Commission

Puente Power Project Air Quality and GHG - Final Staff Assessment

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January 10, 2017 Puente FSA Workshop

Oxnard, CA



Preparation of Puente AQ FSA

- ❖ Staff used the PSA and comments received on the PSA to prepare the FSA
- ❖ Staff worked with Ventura APCD to analyze:
 - ❖ Air impacts
 - ❖ Laws, Ordinances, Regulations and Standards (LORS) compliance
- ❖ Staff performed additional AQ impact analyses to respond to public comments, including analyzing SCE's McGrath facility
- ❖ Staff expanded the Environmental Justice analysis



AQ FSA Conclusions

- ❖ Conclusions did not change from PSA
- ❖ Proposed project would comply with all Laws, Ordinances, Regulations and Standards (LORS)
- ❖ Proposed project would not result in significant AQ impacts
- ❖ Proposed project would not result in EJ AQ impacts
- ❖ Staff recommends conditions of certification that would ensure mitigation and compliance



AQ FSA – Additional Modeling

Staff performed additional modeling analyses:

- ❖ To evaluate impacts of the proposed Puente project with the existing cumulative sources during construction, commissioning, normal operations, and startups/shutdowns
- ❖ To use the non-adjusted u^* option in AERMOD (the regulatory default option until December 2016 - see more details in appendices **AIR-2** and **AIR-3**)
- ❖ All modeling scenarios above include SCE's McGrath facility
- ❖ Additional modeling did not change conclusions between the PSA and FSA



AQ FSA - Mitigation

- ❖ Staff recommends first using selected census tracts where mitigation funding should be applied
 - ❖ Based on CalEnviroScreen 2.0, census tracts with a score of 75 percent or higher as determined by the **Environmental Justice** section of the FSA
 - ❖ Applicant must use a “good faith effort” to obtain mitigation from within these census tracts
- ❖ SO_x mitigation was adjusted based on a long-term grain loading of sulfur content in natural gas, changed from 0.75 grains/ standard cubic feet (scf) in PSA to 0.25 grains/scf in FSA



AQ FSA – Puente Operations

- ❖ The “reasonably expected worst case” annual capacity factor:
 - ❖ Increased from 10% to 11% for the CEQA analysis
 - ❖ But staff fully analyzed air emissions and impacts at the approx. 24% annual capacity factor, or permitted levels
- ❖ Puente operating at an 11% annual capacity factor would produce the same amount of energy as MGS Units 1 & 2 produced in 2015 (AQ Table 29)
- ❖ Puente would only have to operate at an annual capacity factor of about 8% to produce the same amount of energy as MGS Units 1 & 2 averaged over the past 6 years (AQ Table 29)



AQ FSA – EJ and CalEnviroScreen

- ❖ **Environment Justice** subsection was added to Air Quality section and includes CES 2.0 results
- ❖ Disadvantaged census tracts were determined based on a CES 2.0 overall score of 75 percent or higher

Air Quality Table 32
CES 2.0 Indicator Percentile Scores

Census Tract ¹	Overall Score Range ²	Ozone Concentration ³ ($\mu\text{g}/\text{m}^3$)	Ozone Percentile ⁴ (%)	PM2.5 Concentration ⁵ ($\mu\text{g}/\text{m}^3$)	PM2.5 Percentile ⁴ (%)
6111004902	96-100%	0.00002	0.1	8.9	36.5
6111009100	91-95%	0.00000	0.0	8.9	36.3
6111004715	91-95%	0.00000	0.0	9.1	39.5
6111003900	81-85%	0.00000	0.0	8.9	36.9
6111004503	76-80%	0.00000	0.0	9.0	37.9

(Source: CalEnviroScreen 2.0 Data, www1.oehha.ca.gov/calenviroscreen/maps-data/download-data)



Greenhouse Gases FSA

- ❖ New language was added in the FSA to address modifications made to California's AB 32 legislation, including extending requirements beyond 2020
- ❖ Conclusions did not change between the PSA and the FSA



Air Quality/Greenhouse Gas FSA

- ❖ Staff provided responses to comments
- ❖ Staff recommends conditions of certification that would ensure Puente, if built, would be mitigated and operate in compliance
- ❖ Staff does not have any outstanding data or analysis needs