

## DOCKETED

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# **Air Quality/GHG Data Request Response Follow-up**



# EPS Demolition

- Data Request 3
  - Can stated methods of demolition be stipulated to in a Condition of Certification, or at least a condition that does not allow implosion of stack and boiler building?
  - Additional Description of the Mast Climbing Platform System (MCPS). [Please make sure response to DR set 2 #40 is adequate]
  - Where will impacts hammers be used?
  - Will plasma torches be used to remove steel liner?
  - Have various smaller engines needed for equipment on the MCPS been accounted in the emissions estimate? Or will there be electrical connection up to the MCPS?



# EPS Demolition

- Data Request 4
  - Will boiler metal framing structure controlled implosion be completed before or after boiler building walls are removed?
  - Will the high reach excavators used for concrete wall removal use impact hammers?
  - Will the grade eventually made even and safety railings removed? It is unclear if the response, and the EPS demolition emissions estimate, includes all demolition required under agreement with the City.



# EPS Demolition

- Data Request 6a
  - Use of CalEEMod default assumptions likely underestimate equipment horsepower requirements for this demolition job.
- Data Request 6c
  - What is the basis for the trip distance values provided in the response?
- Data Request 6d
  - Can haul trucks stay on paved areas throughout the demolition?
  - Consideration of unpaved travel at other end of disposal trips at landfill or other disposal sites should have been included in the estimates.



# EPS Demolition

- Data Request 7a
  - Thickness of stack steel liner vs. waste steel tonnage estimate seems problematic. (Make sure response to DR set two #40 is adequate to understand the waste quantity estimates provided in first set DR #7 responses).
- Data Request 7c
  - What additional equipment is needed for the onsite recycling (crushing/screening plants)?
- Data Request 7d
  - Can Moody's recycling and EDCO CDI recycling handle the quantities from this demolition?
  - Where will the non-recyclable debris go and what is the travel distance?
- Data Request 7f
  - Please explain how the EPS intake and outfall will be filled. Will there be no concrete used or other materials that would need to be imported?



# Construction/Demolition Assumptions

- Data Request 9
  - Are the engine tier assumptions lower than requested in the change to COC AQ-SC5?
  - Using default trip distance assumptions may underestimate emissions.

# Operating Emissions

- Data Response 11
  - Note: staff believes the default compressor seal emissions value used may be problematic, so we'll be working with the District on determining if that value requires revision.
- Data Response 12
  - Note: staff believes that the comparison between the proposed Carlsbad and Pio Pico emissions/water use/etc. estimates is relevant considering both projects are new LMS100 projects without any known meaningful reason why emissions levels at the same ppm level of control would be different.





# Air Dispersion Modeling

- Data Requests 14/15
  - A value of 2 to 3 meters is a more reasonable assumption for fugitive dust release heights.
  - Wind erosion emissions should have been estimated and modeled...CalEEMod has holes in its emissions estimates like this one that should be filled.



# GHG Emissions Estimate

- Data Request 18
  - The GHG emissions rate estimate (in metric tons/MWh) should be a net MW emissions value with the reduced GHG emissions and reduced MW generation from the startups and shutdown included. The current estimate is simply giving the performance specification for the gas turbines operating at full load and not a facility-wide operating scenario estimate. Please provide a revised recalculated value of the GHG emissions that includes the reduced fuel use and generation during a reasonable estimate of the expected ratio of starts and stops operation and full load operation.



# Thermal Plume Data

- Data Request 20
  - How many fans are in a single fin-fan cooler? We are currently assuming 12 due to the 3:1 length to width ratio and the overall size to obtain a reasonable fan size in comparison to the approved projects fin-fan cooler fan size.



# New Issues for Discussion

- Issue 1 – Engine Horsepower
  - There are inconsistencies in the horsepower size given for the two emergency engines within the PTA. Please identify the correct horsepower and kW values for these two engines.
- Issue 2 – Hours of Day Limitation
  - Please identify if the 0600 to 2400 operating hours limitation can be stipulated to in a Condition of Certification.



# PDOC Schedule

- District's current estimate for the PDOC publications date is:
  - Sometime in the first two weeks of October
  - Air dispersion modeling is creating delay