

## DOCKETED

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CALIFORNIA ENERGY COMMISSION

# Carlsbad Energy Center Project Petition to Amend PSA Air Quality/GHG

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## Energy Commission/SDAPCD Air Quality/GHG Panel

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Steve Moore, San Diego Air Pollution Control District

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- ❖ Project Engineer/Co-Author of PDOC



## Air Quality – PSA

Evaluate changes relative to approved project:

- ❖ Describe environmental and regulatory setting
- ❖ Detail air pollutant emissions
- ❖ Analyze project's air pollutant impacts and compliance with LORS
- ❖ Identify air pollutant mitigation / recommend conditions of certification

Preliminary Impact Analysis Findings:

- ❖ Project would comply with LORS
- ❖ Mitigated construction impacts would be less than significant.
- ❖ Staff is recommending adequate operating emissions offsets (AQ-SC10).
- ❖ Mitigated operation impacts would be less than significant.
- ❖ Staff/Air District recommended Conditions of Certification ensure LORS compliance and less than significant impacts.



## Air Quality – PSA

Outstanding information required from Petitioner

- ❖ None

Remaining issues for FSA Completion

- ❖ Completion of FDOC
- ❖ Complete and document cumulative modeling analysis for concurrent CECP operation and EPS demolition.
- ❖ Finalize staff conditions
- ❖ Compile and address petitioner, intervenor and public comments



## Air Quality – PSA

### Additional Cumulative Air Pollutant Modeling Analysis:

- ❖ Augmented SDAPCD CECP start-up modeling input files to include EPS demolition emissions sources.
- ❖ Modeling conducted for PM<sub>10</sub>/PM<sub>2.5</sub> and NO<sub>2</sub> emissions impacts.
- ❖ Initial cumulative modeling analysis preliminary findings include:
  - ❖ PM<sub>10</sub>/PM<sub>2.5</sub>/annual NO<sub>2</sub> cumulative impacts are less than significant.
  - ❖ Maximum 1-hour NO<sub>2</sub> cumulative impacts beyond fence line have potential to exceed federal 1-hour standard when emergency engines are tested. Impacts are below standard without emergency engines.
- ❖ Likely result of analysis is to add staff condition of certification to limit emergency engine testing to hours outside of demolition work hours.



## Greenhouse Gases – PSA

Evaluate changes relative to approved project:

- ❖ Describe environmental and regulatory setting
- ❖ Detail GHG emissions
- ❖ Analyze project's GHG emissions impacts and compliance with LORS
- ❖ Identify any recommended GHG emissions conditions of certification

Preliminary Impact Analysis Findings:

- ❖ Project would comply with GHG LORS
- ❖ Project would be required to comply with California Cap and Trade Rule
- ❖ Project would conform with the Avenal Precedent Decision
- ❖ Project would have less than significant GHG impacts per California CEQA Guidelines.
- ❖ Project would be mitigated by various air quality conditions, and condition WASTE-5 that would require construction/demolition waste recycling.



## Greenhouse Gases – PSA

### Outstanding information required from Petitioner

- ❖ None

### Remaining issues for FSA Completion

- ❖ Completion of FDOC (for continuity of operating emissions estimates)
- ❖ Finalize recommended staff conditions, including any revisions that may be needed to augment WASTE-5 to ensure demolition/construction waste recycling in conformance with GHG emissions reduction goals.
- ❖ Compile and address petitioner, intervenor and public comments