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Supplemental Responses to CEC Staff Data Request 2 and 23

McLaren Backup Generating Facility (17-SPPE-01)

SUBMITTED TO: CALIFORNIA ENERGY COMMISSION

SUBMITTED BY: **Vantage Data Centers**

February 2018

DAYZEN LLC

AIR QUALITY

BACKGROUND: CONSTRUCTION RELATED EMISSIONS AND IMPACTS

Staff has reviewed the construction related emissions that were analyzed by the city of Santa Clara in its IS/MND. However, the project has now changed to a larger facility with a different configuration and layout, requiring updated construction-related emission information for the new configuration of the McLaren Backup Generating Facility (MBGF).

DATA REQUEST

2. Please provide emission estimates and impacts analysis for both criteria pollutants and toxic air contaminants for the construction phase of the modified configuration of MBGF.

RESPONSE TO DATA REQUEST 2

The only construction activities associated with the MBGF are placement of the generators and the construction of the structure that hold the second stack of generators. The following characteristics were used to estimate emissions from construction activities: For placement of one generator, a crane would be operating for 2 hours and a heavy-heavy duty truck would be idling for 2 hours. For the construction of the structure, it was assumed to take one loader and one welder operating for 8 hours/day for 5 days to build the structure for 1 building. This means that the three structures needed for the 3 buildings would take 15 days total to construct. Table DR2 (provided to Commission Staff via upload) summarizes calculated total emissions estimates. CalEEMod was used to estimate emissions from construction equipment and EMFAC2014 was used to estimate idling emissions from the heavy-heavy duty truck. Calculated emissions from placement of all 48 generators and construction of the 3 structures was compared to the total construction emissions from the 2016 CEQA MND analysis submitted to the City of Santa Clara for the impacts analysis. For comparison, the calculated emissions from placement of the generators and structures ranged from 0.23-0.49% of total emissions from the 2016 analysis, depending on the pollutant. The cancer risk from the 2016 CEQA MND construction HRA was 3.54 in one million. Since all pollutants, including DPM (which is the surrogate for health risk) were well below the totals from the less-than-significant 2016 CEQA MND construction HRA emission totals, the estimated construction emissions from placement of the generators and structures are deemed de minimis.

BACKGROUND: RECEPTORS

Staff has reviewed the document titled “Air Quality Technical Report Replacement for MBGF Application for SPPE - Appendix E-1”. The applicant reported the health risk impacts of the maximally exposed individual sensitive receptor (MEISR) in Table ES-2 and Table 13. However, MEISR is equivalent to the receptor of the maximally exposed individual (MEI) at a residence, or a MEIR. Staff would like to get information of health risk impacts of other receptors, including the hypothetical point of maximum impact (PMI) and the maximally exposed individual worker (or MEIW), off-site.

DATA REQUEST

23. Please provide the health risk impacts (including cancer risk, chronic non-cancer health index, acute non-cancer hazard index, and UTM coordinates) of both construction and operation for the following receptors:
    a. Point of maximum impact (PMI);
    b. Maximally exposed individual worker (MEIW), off-site; and,
    c. The soccer facility south of the project site.

RESPONE TO DATA REQUEST 23

Construction emissions associated with placement of the generators at the MBGF were found to be de minimis in Response to Data Request 2 so health impacts did not need to be evaluated. Staff has requested that fenceline and sidewalk receptors located adjacent to the facility be assigned worker exposure parameters for assessment of the point of maximum impact (PMI), which includes a 25-year exposure of being present in that fenceline location 8 hours/day and 250 days/year. Ramboll is not in agreement with this methodology and believes every receptor should be assigned exposure parameters based on existing conditions and land uses or what could feasibly occur at each receptor over the duration of the project. It is not reasonable that a resident or worker will be present for 25-30 years on the fenceline of the Site or the adjacent sidewalk. However, consistent with the Staff’s request, Ramboll has provided results of an analysis that assumes every receptor that is not classified as a resident or soccer child is assumed to have worker exposure parameters. This includes all receptors on the fenceline and all other public spaces adjacent to the project site. We have also determined where the actual Maximally Exposed Individual Worker (MEIW) is and included that in Table DR23 (provided to the Commission via upload). Table DR23 includes the worker exposure parameters used in this assessment, and the resulting health risk impacts for each type of receptor. Locations of the receptors are also tabulated. All receptors remain below the BAAQMD CEQA Thresholds of Significance. Database DR23 (attached) includes all HRA tables and data.