

CALIFORNIA ENERGY COMMISSION1516 Ninth Street
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December 4, 2008

Chuck Hicklin, Project Manager
Mirant Corporation
P.O. Box 192
Pittsburg, CA 94565**DOCKET**
08-AFC-6DATE DEC 04 2008RECD. DEC 04 2008

Dear Mr. Hicklin,

RE: WILLOW PASS (08-AFC-6)- DATA REQUEST ADDENDUM SET 1A (#49-58)

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe manner, and 5) assess potential mitigation measures.

These data requests are being made in the technical area of Air Quality only. Written responses to the enclosed data requests are due to the Energy Commission staff on or before January 5, 2009, or at such later date as may be mutually agreed upon.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to the Committee and me within 20 days of receipt of this notice. The notification must contain the reasons for the inability to provide the information or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions regarding the enclosed data requests, please call me at (916) 654-3911.

Sincerely,

Ivor Benci-Woodward
Energy Facility Siting Project Manager

Enclosures

cc: Docket (08-AFC-6)

Technical Area: Air Quality
Author: Brewster Birdsall

BACKGROUND

Greenhouse Gas Emissions

Energy Commission staff plans to use AFC Appendix J3, p.J3-2, to quantify the emissions of greenhouse gases (GHG) caused during construction of the project. These include carbon dioxide, nitrous oxide, and methane (unburned natural gas). However, it is not clear whether activity for construction of linear facilities, worker commutes, and material deliveries using diesel trucks during demolition of retired Pittsburg Power Plant Units 1 through 4 and construction (including those shown in AFC Figure 2.7-5 and in Section 7.10.2.2) are included in the GHG totals. AFC Section 2.7.5 shows the proposed general construction emission control measures that may also reduce GHG emissions from construction. Staff also seeks to quantify emissions from worker commutes and material deliveries, which are expected to be approximately 40 daily worker trips and 20 daily delivery truck trips (AFC Section 7.10.2.3) during operation of the proposed project.

DATA REQUEST

49. Please show the total and annual GHG emissions for the demolition and construction phases of the proposed project including all activities at the construction site and any construction activities for linear facilities (gas and water pipelines and transmission lines), worker commutes, construction equipment and material deliveries, and demolition waste removal.
50. Please quantify emissions of criteria pollutants and GHG from worker commutes and material deliveries (for example, for ammonia delivery or for waste removal) during operation of the proposed project.

BACKGROUND

Fire Pump or Emergency Generator

The AFC does not mention whether a fire pump or an emergency generator is proposed for the project.

DATA REQUEST

51. Please confirm whether a fire pump or an emergency generator would be needed for the project.
52. If either a fire pump or the emergency generator is needed, please provide their manufacturer's specifications and their respective operating schedule and emissions estimated.

BACKGROUND

Estimated Facility Emissions

In AFC Section 7.1.2.2, operational emissions are described with assumptions and explanations of calculations. Emissions for worst-case scenarios are summarized in AFC Table 7.1-16 without total emissions per period for all pollutants. However, without calculations and assumptions that lead to facility-wide emission rates, staff does not have complete information supporting the facility's emissions in AFC Table 7.1-16. Similarly, there is no vendor information supporting the proposed startup and shutdown emission rates shown in AFC Table 7.1-14 and Table 7.1-23. The AFC is not clear on whether multiple startup and shutdown events could occur during the worst-case hour.

DATA REQUEST

53. Please provide calculations, assumptions, and methods used to estimate the total facility hourly and daily emissions provided in AFC Table 7.1-16, showing all sources and pollutants.
54. Please provide vendor guarantees to support the proposed startup and shutdown emissions values listed in AFC Table 7.1-14 and Table 7.1-23 and cited in Appendix J4.
55. Please describe whether the worst-case hour of operation could involve multiple startup and shutdown events and whether a condition limiting operation to one startup per hour would be acceptable.

BACKGROUND

Dispersion Modeling

The applicant submitted updated dispersion modeling files to the Energy Commission in October 2008 in response to the BAAQMD comments. Staff has not yet reviewed these files. Of particular concern would be adherence to BAAQMD recommendations for meteorological data. Staff may develop additional data requests upon review of the new modeling files.

DATA REQUEST

56. Please provide documentation (such as a copy of the BAAQMD comments, a Report of Conversation, or email correspondence with BAAQMD staff) that confirms that the October 2008 dispersion modeling was completed to the satisfaction of the BAAQMD.

BACKGROUND

Cumulative Modeling Analysis

AFC Section 7.1.3 describes a cumulative modeling impact assessment that has not yet been filed with the Energy Commission.

DATA REQUEST

57. Please provide the analysis of cumulative air quality impacts and ensure that the existing Pittsburg Power Plant Units 5, 6, and 7 and the proposed Marsh Landing Generating Station are included.