

DOCKET

09-AFC-1

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OCT 01 2009

RESPONSES TO CEC DATA REQUESTS (#1-39) APPLICATION FOR CERTIFICATION (09-AFC-1)

for Watson Cogeneration Steam and Electric Reliability Project

AIR QUALITY RESPONSE #4 STATUS REPORT 1



Submitted to:
California Energy Commission
1516 9th Street , MS 15
Sacramento, CA 95814-5504



Submitted by:
Watson Cogeneration Company
22850 South Wilmington Avenue
Carson, CA 90745



With support from:
URS Corporation
8181 East Tufts Avenue
Denver, CO 80237



October 2009



Response to Data Request Set 1, Data Request 4

Air Quality Data Request 41

Attachments

Attachment A Listings of RTCs and ERCs

List of Acronyms and Abbreviations Used in Responses

AFC	Application for Certification
Applicant	Watson Cogeneration Company
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CTG	combustion gas turbine
District	South Coast Air Quality Management District
ERC	Emission Reduction Credit
lb	Pound
NO _x	nitrogen oxides
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of less than 10 microns
PM _{2.5}	particulate matter with an aerodynamic diameter of less than 2.5 microns
RECLAIM	Regional Clean Air Incentives Market
RTCs	RECLAIM Trading Credits
SCAQMD	South Coast Air Quality Management District
SO _x	sulfur oxides
VOC	volatile organic compound

AIR QUALITY DATA REQUEST 4

Technical Area: Air Quality

Author: Steve Radis

BACKGROUND: OPERATIONS MITIGATION – EMISSION REDUCTION CREDITS

Staff's position for determining the impact of operating emissions per the California Environmental Quality Act (CEQA), is that all nonattainment pollutants and their precursors need to be mitigated through emission reductions at a minimum ratio of 1:1, with larger ratios required for inter-pollutant, inter-basin and distant Emission Reduction Credit (ERC) sources. The South Coast Air Basin in the area of the project site is classified as nonattainment for the state and federal ozone and PM₁₀ standards. Without proper emission reduction mitigation, this project could contribute to existing violations of the state and federal ambient air quality standards.

The applicant has proposed to utilize VOC ERCs from existing refinery holdings or purchased on the open market. NO_x and SO_x RECLAIM Trading Credits (RTCs) are also proposed from the existing refinery allocation or additional RTCs will be acquired.

DATA REQUEST

- 4. If the applicant is unable to adequately respond to the Data Request above, please provide a status report starting October 1, 2009 and continuing monthly until the report identifies option contracts and/or evidence of acquisition of ERCs for the NO_x, SO_x, VOC and PM₁₀ liability of the project, or the start of project Air Quality Evidentiary Hearings. The report should be specific to each pollutant and provide new information and update information from previous monthly status reports as appropriate. The reports should include:***
 - a) contact names and telephone numbers;***
 - b) company or source names;***
 - c) pollutant credit types and amounts in lbs/day;***
 - d) ERC certificate numbers;***
 - e) the methods of emission reductions (e.g., shutdown, reduction of hours of operation, emission controls, etc.);***
 - f) the status of ERC or option negotiations;***
 - g) prices or potential prices; and,***
 - h) the location of the emission reduction credits.***

RESPONSE

Status update for Nitrogen Oxide (NO_x)

The BP refinery and Watson Cogeneration Company currently participate in the NO_x Regional Clean Air Incentives Market (RECLAIM) Trading Credits (RTCs) program. BP currently holds 1,485,062 pounds (lbs) of coastal NO_x through the year 2024. The proposed project will require 79,800 lbs during the first year of operation. BP will purchase additional RTC allocations corresponding to the facility's increased emissions in compliance with South Coast Air Quality Management District (SCAQMD) Rules 2005 and 2007. A listing of the current BP allocated RTCs are included as Attachment A.

Status update for Sulfur Oxides (SO_x)

The BP refinery and Watson Cogeneration Company currently participate in the SO_x RECLAIM Trading Credits (RTCs) program. BP currently holds 929,339 lbs of coastal SO_x through the year 2024. The proposed project will require 59,800 lbs during the first year of operation. BP will purchase additional RTC allocations corresponding to the facility's increased emissions in compliance with SCAQMD Rules 2005 and 2007. A listing of the current BP allocated RTCs are included as Attachment A.

Status update for Volatile Organic Compounds (VOCs)

The Applicant will require, based on the offset ratio of 1:1.2, 119.7 lbs per day of VOC ERCs. Currently, BP owns 7 lbs per day of coastal zone credits. BP has secured a broker for obtaining the needed VOC ERCs. Based on input from the broker, 150 pounds of VOC ERCs are currently available on the market. A listing of the credits held by BP is included as Attachment A.

Status update for sub 10-micron particulate matter (PM₁₀)

BP currently owns 148 lbs per day of PM₁₀ ERCs. The project will require, at a 1:1.2 ratio, 288 lbs per day of coastal zone PM₁₀ ERCs. The project will have a zero net increase in emissions and will maintain the existing limit of 1,244 lbs per day. A listing of the ERCs held by BP is included as Attachment A.

Pricing information has not been provided, as this information is considered to be a "confidential" aspect of any ERC transaction, and has no bearing on any aspect of project review or certification.

ATTACHMENT A
LISTINGS of RTCs and ERCs

SCAQMD
EMISSION REDUCTION CREDITS AND
SHORT TERM EMISSION REDUCTION CREDITS
JULY 2009

Downloaded on Sept. 3, 2009

FAC ID	ERC NBR	COMPANY NAME	ADDRESS	CITY	ZIP	POLLUTANT	AMOUNT (lb/day)	COASTAL/INLAND	ISSUED
131003	AQ004891	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	CO	1	Coastal	3/06/2003
131003	AQ006438	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	CO	1	Coastal	1/11/2007
131003	AQ004893	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	CO	11	Coastal	3/07/2003
131003	AQ004892	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	CO	77	Coastal	3/07/2003
131003	AQ006439	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	1	Coastal	1/11/2007
131003	AQ004911	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	3	Coastal	3/28/2003
131003	AQ004907	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	4	Coastal	3/21/2003
131003	AQ004908	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	4	Coastal	3/21/2003
131003	AQ004909	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	4	Coastal	3/21/2003
131003	AQ004910	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	4	Coastal	3/21/2003
131003	AQ005936	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	14	Coastal	11/02/2005
131003	AQ004894	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	PM10	114	Coastal	3/07/2003
131003	AQ007588	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	ROG	4	Inland	2/21/2008
131003	AQ008748	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	ROG	7	Coastal	1/08/2009
131003	AQ006437	BP WEST COAST	PRC 2350 E 223RD ST	CARSON	90749	SOX	2	Coastal	1/11/2007

**FACILITY PERMIT TO OPERATE
 BP WEST COAST PROD.LLC BP CARSON REF.**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year		Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 09/01/09 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
Begin (month/year)	End				
7/2006	6 /2007	Coastal	1485062	83278	0
1/2007	12/2007	Coastal	0	0	0
7/2006	6 /2007	Inland	0	83000	0
7/2007	6 /2008	Coastal	1485062	0	0
1/2008	12/2008	Coastal	0	268076	4342
7/2007	6 /2008	Inland	0	102263	0
7/2008	6 /2009	Coastal	1485062	1165717	40097
1/2009	12/2009	Coastal	0	256985	8576
7/2008	6 /2009	Inland	0	71048	0
7/2009	6 /2010	Coastal	1485062	1235727	80193
1/2010	12/2010	Coastal	0	252250	12864
7/2009	6 /2010	Inland	0	68807	0
7/2010	6 /2011	Coastal	1485062	1195481	120290
1/2011	12/2011	Coastal	0	458514	17151
7/2010	6 /2011	Inland	0	66566	0
7/2011	6 /2012	Coastal	1485062	1155234	160387
1/2012	12/2012	Coastal	0	458514	17151

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

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Year		Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 09/01/09 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
Begin (month/year)	End				
7/2011	6 /2012	Inland	0	64325	0
7/2012	6 /2013	Coastal	1485062	1155234	160387
1/2013	12/2013	Coastal	0	458514	17151
7/2012	6 /2013	Inland	0	64325	0
7/2013	6 /2014	Coastal	1485062	1155234	160387
1/2014	12/2014	Coastal	0	458514	17151
7/2013	6 /2014	Inland	0	64325	0
7/2014	6 /2015	Coastal	1485062	1155234	160387
1/2015	12/2015	Coastal	0	458514	17151
7/2014	6 /2015	Inland	0	64325	0
7/2015	6 /2016	Coastal	1485062	1155234	160387
1/2016	12/2016	Coastal	0	458514	17151
7/2015	6 /2016	Inland	0	64325	0
7/2016	6 /2017	Coastal	1485062	1155234	160387
1/2017	12/2017	Coastal	0	458514	17151
7/2016	6 /2017	Inland	0	64325	0
7/2017	6 /2018	Coastal	1485062	1155234	160387

Footnotes:

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Begin (month/year)	End				
1/2018	12/2018	Coastal	0	458514	17151
7/2017	6 /2018	Inland	0	64325	0
7/2018	6 /2019	Coastal	1485062	1155234	160387
1/2019	12/2019	Coastal	0	458514	17151
7/2018	6 /2019	Inland	0	64325	0
7/2019	6 /2020	Coastal	1485062	1155234	160387
1/2020	12/2020	Coastal	0	458514	17151
7/2019	6 /2020	Inland	0	64325	0
7/2020	6 /2021	Coastal	1485062	1155234	160387
1/2021	12/2021	Coastal	0	458514	17151
7/2020	6 /2021	Inland	0	64325	0
7/2021	6 /2022	Coastal	1485062	1155234	160387
1/2022	12/2022	Coastal	0	458514	17151
7/2021	6 /2022	Inland	0	64325	0
7/2022	6 /2023	Coastal	1485062	1155234	160387
1/2023	12/2023	Coastal	0	458514	17151
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Begin (month/year)	End				
7/2023	6 /2024	Coastal	1485062	1155234	160387
1/2024	12/2024	Coastal	0	458514	17151
7/2023	6 /2024	Inland	0	64325	0

Footnotes:

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The annual allocation of SOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total SOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - TradingZone Restrictions is listed on the last page of this Section.

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Year		Zone	SOx RTC Initially Allocated	SOx RTC ¹ Holding as of 09/01/09 (pounds)	Non-Tradable ² Credits (NTCs) (pounds)
Begin (month/year)	End				
7/2006	6 /2007	Coastal	626787	156359	
1/2007	12/2007	Coastal	0	0	
7/2007	6 /2008	Coastal	626787	0	
1/2008	12/2008	Coastal	0	624523	
7/2007	6 /2008	Inland	0	0	
7/2008	6 /2009	Coastal	626787	745927	
1/2009	12/2009	Coastal	0	241760	
7/2008	6 /2009	Inland	0	31400	
7/2009	6 /2010	Coastal	626787	854339	
1/2010	12/2010	Coastal	0	241760	
7/2010	6 /2011	Coastal	626787	854339	
1/2011	12/2011	Coastal	0	146705	
7/2011	6 /2012	Coastal	626787	929339	
1/2012	12/2012	Coastal	0	146705	
7/2012	6 /2013	Coastal	626787	929339	
1/2013	12/2013	Coastal	0	146705	
7/2013	6 /2014	Coastal	626787	929339	

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Begin (month/year)	End				
1/2014	12/2014	Coastal	0	146705	
7/2014	6 /2015	Coastal	626787	929339	
1/2015	12/2015	Coastal	0	146705	
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1/2016	12/2016	Coastal	0	146705	
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7/2018	6 /2019	Coastal	626787	929339	
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1/2020	12/2020	Coastal	0	146705	
7/2020	6 /2021	Coastal	626787	929339	
1/2021	12/2021	Coastal	0	146705	
7/2021	6 /2022	Coastal	626787	929339	
1/2022	12/2022	Coastal	0	146705	

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Begin (month/year)	End				
7/2022	6 /2023	Coastal	626787	929339	
1/2023	12/2023	Coastal	0	146705	
7/2023	6 /2024	Coastal	626787	929339	
1/2024	12/2024	Coastal	0	146705	

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SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase an annual allocation to a level greater than the facility's Starting Allocation plus Non-Tradable Credits as listed below, the application will be evaluated for compliance with Rule 2005(c)(4). Rule 2005(e)-Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	NO _x RTC Starting Allocation (pounds)	Non-Tradable Credits(NTCs) (pounds)
Begin	End			
7/1994	6 /1995	Coastal	3706790	0

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Year		Zone	SOx RTC Starting Allocation (pounds)	Non-Tradable Credits(NTCs) (pounds)
Begin	End			
7/1994	6 /1995	Coastal	3702692	0

STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

Application for Certification for the Watson)
Cogeneration Steam and Electric Reliability Project) Docket No. 09-AFC-1
_____))
_____)

PROOF OF SERVICE

I, Karen A. Mitchell, declare that on October 1, 2009, I served the attached *Responses to CEC Data Requests – Air Quality Response #4 Status Report 1* via electronic mail and United States Mail to all parties on the attached service list.

I declare under the penalty of perjury that the foregoing is true and correct.



Karen A. Mitchell



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

APPLICATION FOR CERTIFICATION
FOR THE **WATSON COGENERATION
STEAM AND ELECTRICITY RELIABILITY
PROJECT**

Docket No. 09-AFC-1

PROOF OF SERVICE LIST
(Revised 9/23/09)

APPLICANT

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ENERGY COMMISSION

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Chair and Presiding Member
kldougla@energy.state.ca.us

JULIA LEVIN
Commissioner and Associate
Member
jlevin@energy.state.ca.us

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*indicates change