

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

Application for Certification for the
Watson Cogeneration Steam and Electric
Reliability Project

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Docket No. 09-AFC-1

Applicant's Comments

On

The Presiding Member's Proposed Decision

DOCKET	
09-AFC-1	
DATE	<u>MAR 19 2012</u>
RECD.	<u>MAR 19 2012</u>

March 19, 2012

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Watson Cogeneration Company ("Applicant") appreciates the work of the Staff and the Committee leading to the publication of the Presiding Member's Proposed Decision ("PMPD"). Applicant supports the PMPD in all aspects subject to the following clarifications of the timeframes in Conditions of Certification AQ-SC9 and AQ-SC10.

AQ-SC9 The project owner shall perform quarterly cooling tower recirculating water quality testing, or shall provide for continuous monitoring of conductivity as an indicator, for total dissolved solids content.

Verification: The project owner shall submit to the CPM cooling tower recirculating water quality tests or a summary of continuous monitoring results and daily recirculating water flow in the Quarterly Operation Report (**AQ-SC8**). If the project owner uses continuous monitoring of conductivity as an indicator for total dissolved solids content, the project owner shall submit data supporting the calibration of the conductivity meter and the correlation with total dissolved solids content at least once each year in a Quarterly Operation Report (**AQ-SC8**).

Clarification: *If the project owner uses continuous monitoring of conductivity as an indicator for total dissolved solids content, the project owner shall submit data supporting the calibration of the conductivity meter and the correlation with total dissolved solids content at least once each year in a Quarterly Operation Report (AQ-SC8).*

AQ-SC10 The new cooling tower cells daily PM10 emissions shall be limited to 7.92 lb/day in total for both cooling tower cells. The cooling towers shall be equipped with a drift eliminator to control the drift fraction to 0.001 percent of the circulating water flow. Total dissolved solids (TDS) shall be limited to 3,575 ppmw. The project owner shall estimate daily PM10 emissions from the cooling towers using the water quality testing data or continuous monitoring data and daily circulating water flow data collected on a quarterly basis. Compliance with the cooling tower PM10 emission limit shall be demonstrated as follows:

PM10 = cooling water recirculation rate * total dissolved solids concentration in the blowdown water * design drift rate.

Clarification: *The project owner shall estimate daily PM10 emissions from the cooling towers using the water quality testing data or continuous monitoring data and daily circulating water flow data collected on a quarterly basis.*

Dated: March 19, 2012

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By 
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STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

Application for Certification for the WATSON)
COGENERATION STEAM AND ELECTRICITY) Docket No. 09-AFC-01
RELIABILITY PROJECT)
_____)

PROOF OF SERVICE

I, Karen A. Mitchell, declare that on March 19, 2012, I served the attached *Applicant's Comments on the Presiding Member's Proposed Decision* via electronic mail and U.S. 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

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09-AFC-01**

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