

**DOCKETED**

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<b>Project Title:</b>	SMUD Cosumnes Power Plant - Compliance
<b>TN #:</b>	225996
<b>Document Title:</b>	SFA's Comments on the the Staff Assessment
<b>Description:</b>	N/A
<b>Filer:</b>	Jerry Salamy
<b>Organization:</b>	Jacobs/SFA
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SFA 18-012

December 3, 2018

Mary Dyas  
Compliance Project Manager  
California Energy Commission  
Siting, Transmission, & Environmental Protection Division  
1516 9<sup>th</sup> Street, MS-2000  
Sacramento, CA 95814

**Subject:** Sacramento Municipal Utility District Finance Authority's Comments on the Cosumnes Power Plant (01-AFC-19C) Staff Assessment

Dear Ms. Dyas:

The Sacramento Municipal Utility District Finance Authority (SFA) appreciates the opportunity to provide the following comments on the Cosumnes Power Plant (CPP) Staff Assessment issued on November 8, 2018 (Transaction Number TN-225863). The comments are provided in a chronologic order with section heading and page numbers to assist your review.

Executive Summary, Page 2, Introduction, 1<sup>st</sup> Full Paragraph - Please replace the "o" with the word "to".

Executive Summary, Page 3, Staff's Assessment of the Proposed Amendment, 2<sup>nd</sup> paragraph -Socioeconomics should be added to the list of technical or environmental areas not affected by the proposed operation of the previously installed CPP components consistent with Executive Summary Table 1.

Executive Summary, Page 4, Staff's Assessment of the Proposed Amendment, Executive Summary Table 1 - Paleontological Resources appears twice in this table.

Air Quality, Page 1, Introduction and Summary, 1<sup>st</sup> Paragraph - The SFA CPP Petition to Amend (PTA) was filed on August 29, 2018 not September 29, 2018.

Air Quality, Page 3, Air Quality Table 1, 40 CFR 60, Subpart KKKK - Compliance with this Subpart will be demonstrated using an annual source test consistent with the compliance requirements of Title 40, CFR, Part 60, Section 60.4340(a).

Air Quality, Page 9, Operation Summary and Emissions Analysis, 1<sup>st</sup> Paragraph - The existing CPP electrical production megawatts (MW) do not match those presented on Page 3 of the Executive Summary. Please make the following deletions in strikethrough and insertions as underline/bold.

The upgrade would raise CPP's overall rating from ~~534~~ MW to 603.2 MW. The individual combustion turbine nameplate-capacity would increase from 170 MW to 198.1 MW, and the 2-on-1 steam generator would increase from ~~194~~ MW to 207 MW.

Air Quality, Page 9, Operation Summary and Emissions Analysis, 2<sup>nd</sup> Paragraph, 5<sup>th</sup> Sentence - As a clarification, the Heat Recovery Steam Generators' design included space to install the oxidation catalyst; therefore, no space had to be created for the oxidation catalyst.

Air Quality, Page 11, Operation Summary and Emissions Analysis, 3<sup>rd</sup> Full Paragraph, 3<sup>rd</sup> Sentence and Air Quality Table 4 - A's noted in Air Quality Table 1 reference for Title 40, CFR Part 64, the oxidation catalyst is not needed to comply with the existing volatile organic compounds (VOC) concentration-based emission limit. Please revise the text and table to note that SFA is not assuming any VOC control for the oxidation catalyst system.

Air Quality, Page 17, New Source Review Analysis, Air Quality Table 12 - The Best Available Control Technology (BACT) Thresholds for carbon monoxide and VOC are reversed (the CO BACT threshold is 550 pounds per day and the VOC BACT threshold is 0 pounds per day).

Air Quality, Page 31, Additional Conditions Changes, 1<sup>st</sup> Sentence - The first Authority to Construct permit number should be 25800, not 2500.

Air Quality, Page 37, Conditions of Certification, AQ-7, Footnote e - Footnote e should reference Title 40, CFR Section 60.4340 and include the statement "compliance will be based on annual performance tests" consistent with the Air District draft permit.

Air Quality, Page 38, Conditions of Certification, AQ-9 - The PM10/PM2.5 Facility Total should be 446.1 pounds per day and not 523.9 pounds per day.

Air Quality, Page 38, Conditions of Certification, AQ-10 - The Condition referenced for short term excursions is AQ-14.

Air Quality, Page 39, Conditions of Certification, AQ-10 - The SO<sub>2</sub> quarterly emission rates should be corrected to the following: 1<sup>st</sup> Quarter - 4,126, 2<sup>nd</sup> Quarter - 4,171, 3<sup>rd</sup> Quarter - 4,217, and 4<sup>th</sup> Quarter - 4,217.

Air Quality, Page 40, Conditions of Certification, AQ-11 - The digester gas volumetric limit should be 2,500 standard cubic feet per minute (SCFM), not 2.500 SCFM.

Air Quality, Page 41, Conditions of Certification, AQ-14 - Please revise the AQ-14(A) as follows, consistent with the Air District draft permit.

- A. Startup is defined as the time period commencing with the introduction of fuel to the gas turbine and ending **immediately prior to** the time that the 15-minute average NOx and CO concentrations do not exceed 2.0 ppmvd at 15% O2 and 4.0 ppmvd at 15% O2 respectively.

Air Quality, Pages 41/42, Conditions of Certification, AQ-15 - Please revise the AQ-15(A) as follows, consistent with the Air District draft permit.

- A. Startup is defined as the time period commencing with the introduction of fuel to the gas turbine and ending **immediately prior to** the time that the 15-minute average NOx concentrations do not exceed 9.0 ppmvd at 15% O2.

The startup period must not exceed 1 hour following a shutdown of the associated steam turbine or associated HRSG and steam piping of less than 8 hours.

Air Quality, Page 43, Conditions of Certification, AQ-16 - Please revise Condition AQ-16(C) as follows, consistent with the Air District draft permit.

- C. For CO, the CEMS must comply with U.S. EPA Performance Specification in 40 CFR 60 Appendix B Performance Specification 4 **or 4A**.  
[Basis: SMAQMD Rules 201 and 202)

Air Quality, Page 44, Conditions of Certification, AQ-18 - Please delete the phrase "or year respectively" to be consistent with the Air District draft permit.

Air Quality, Page 47, Conditions of Certification, AQ-19 - Please revise Condition AQ-19(C)(i) as follows consistent with the Air District draft permit.

- C. If there were no excess emissions for a calendar quarter:

- i. A report must be submitted indicating that there were no excess **emissions**.

Air Quality, Page 50, Conditions of Certification, AQ-21 - Please revise the title of Condition AQ-21 table as follows consistent with the Air District draft permit.

Amount of Emission Offsets **Provided by** ERCs **That Have Been** Surrendered - Lb/Quarter

Please revise the quarterly PM10 offsets to the following

PM10- See Attachment C 39,724.6, **40,168.3, 40,608.4, 40,607.7**

Ms. Mary Dyas  
Page4  
December 3, 2018

Air Quality, Page 51, Conditions of Certification, AQ-22 - The emission reduction credits numbers should be 00767-00769, 00772-00775.

If you require any clarifications or additional information, please let me know.

Sincerely,



Eric Poff  
Manager, Thermal Generation, Power Generation

cc: D. Blevins/EthosEnergy  
Rene Toledo/SMUD  
Jeff Adkins/Trinity