DOCKETED

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STATEMENT OF STAFF APPROVAL OF PROPOSED CHANGE
DONALD VON RAESFELD POWER PLANT
(02-AFC-03C)

On August 15, 2017, Silicon Valley Power (SVP) filed a post certification petition with the California Energy Commission (CEC). The 122-megawatt facility was certified by the CEC on September 9, 2003 and began commercial operation on March 3, 2005. The DVR is located at 850 Duane Avenue in the city of Santa Clara, in Santa Clara County.

DESCRIPTION OF PROPOSED CHANGE

The petition requests approval to use an identical spare natural gas-fired combustion turbine while maintenance activities are performed on either of the existing natural gas combustion turbines at the facility. Staff recommends the addition of new Air Quality Conditions of Certification **AQ-46** through **AQ-52**.

The requested changes would conform to applicable laws, ordinances, regulations, and (LORS) related to air quality and would not result in significant air quality impacts or any increases to the facility's emissions profile. The petition is available on the CEC's DVR webpage at https://ww2.energy.ca.gov/sitingcases/vonraesfeld/index.html.

ENERGY COMMISSION STAFF REVIEW AND CONCLUSIONS

Title 20, California Code of Regulations, section 1769 states that a project owner shall petition the commission for approval of any change it proposes to the project design, operation or performance requirements.

CEC technical staff reviewed the petition for potential environmental effects and consistency with applicable LORS. Staff has determined that the technical or environmental areas of Biological Resources, Cultural Resources, Geological Resources, Hazardous Materials, Land Use, Paleontological Resources, Public Health, Soil and Water Resources, Transmission Line Safety and Nuisance, Transmission System Engineering, Visual Resources and Worker Safety and Fire Protection, are not affected by the proposed changes.

For the technical areas or environmental areas of Facility Design, Reliability, Noise and Vibration, Socioeconomics, Soil and Water Resources, Traffic and Transportation, and Waste Management staff has determined the project would continue to comply with applicable LORS, would not result in any significant adverse environmental impacts and would not require a change to any conditions of certification.

Staff notes the following for these technical areas:

- **FACILITY DESIGN**: Installation of the foundation and connections associated with this turbine must comply with the 2016 California Building Code and related engineering LORS. Implementation of the existing Facility Design conditions of certification adopted in the CEC Decision would ensure this.

- **NOISE & VIBRATION**: Construction work associated with installation of this turbine would occur during the daytime hours and would be temporary. Any noise generated during this activity would result in a less-than-significant impact with implementation of the existing **NOISE** conditions of certification adopted in the CEC Decision. Operational noise impacts would not be affected by this petition since the spare turbine has noise characteristics identical to the existing turbines.
- **POWER PLANT RELIABILITY:** Use of the spare turbine would allow the power plant to maintain its current level of reliability and equipment availability while maintenance work occurs on the existing turbines. No further analysis related to this topic is needed.
- **SOCIOECONOMICS**: Approximately three additional workers would be necessary to exchange a like-kind turbine at the DVR. The large workforce in the San Jose-Sunnyvale-Santa Clara Metropolitan Statistical Area (Santa Clara County) is more than sufficient for this amendment. From a socioeconomics standpoint, the proposed amendment would have insignificant workforce-related impacts on housing and community services.
- **SOIL AND WATER RESOURCES**: This petition only requests permission to use a combustion turbine identical to the two in operation in case either of the two turbines needs to be taken out for maintenance. Any activity would result in a less- than-significant impact with implementation of the existing conditions.
- **TRAFFIC & TRANSPORTATION**: The two heavy truck trips needed for the like-kind turbine exchange would follow the approved heavy haul route as required by Conditions of Certification **TRANS-6** and **TRANS-7**. The route would eliminate potential traffic impacts by avoiding a left-hand turn from Lafayette Street onto Duane Avenue, where oncoming traffic is often fast and difficult to see in time to navigate the left turn. In addition, the use of the crane would not cause any air traffic hazards because the crane would not meet or exceed 95 feet in height, which is the height at which the Federal Aviation Administration requires approval of a Determination of No Hazard.
- **WASTE MANAGEMENT**: Based on the information provided by the project owner, staff concludes the proposed modifications would not result in additional significant environmental impacts in terms of waste management in comparison with the original analysis for the approved project, provided the owner complies with Conditions of Conditions of Certification **WASTE-3** through **WASTE-5**. The proposed construction would not require any change to the conditions of certification related to waste management adopted in the CEC Decision. Staff also concludes that compliance with current waste management LORS and conditions specified by the Decision would ensure mitigation of the effects of waste management at the site.

For the Air Quality technical area, it has been determined the project would continue to comply with applicable LORS, although changes in conditions of certification are required. Please see Air Quality Attachment A.

ENERGY COMMISSION STAFF DETERMINATION

Pursuant to Title 20, California Code of Regulations, section 1769(a)(3), CEC staff has determined for this petition that approval by the Commission at a noticed business meeting or hearing is not required and the proposed changes meet the criteria for approval by staff because:

(A)

i. there is no possibility that the change may have a significant impact on the environment, or the project is exempt from the California Environmental Quality Act;

ii. the change would not cause the project to fail to comply with any applicable LORS; and

(B)

ii. that no daily, quarterly, annual, or other emission limit will be increased as a result of the change.

Staff also concludes that the proposed changes do not meet the criteria requiring production of subsequent or supplemental review as specified in Title 14, California Code of Regulations, section 15162(a).

WRITTEN COMMENTS

This Statement of Staff Approval of the proposed project changes has been filed in the docket for this project. Pursuant to section 1769(a)(3)(C), any person may file an objection to staff's determination within 14 days of the filing of this statement on the grounds that the project change does not meet the criteria set forth in sections 1769(a)(3)(A) and (B). Absent any objections as specified in 1769(a)(3)(C), this petition will be approved 14 days after this statement is filed.

Written comments or objections to staff's determination may be submitted using the CEC's e-Commenting feature, as follows: Go to the CEC's Donald Von Raesfeld (DVR) Power Plant webpage and click on either the "Comment on this Proceeding," or "Submit e-Comment" link. When your comments are filed, you will receive an email with a link to them.

Written comments or objections may also be mailed or hand-delivered to:

California Energy Commission
Dockets Unit, MS-4
Docket No. 02-AFC-03C
1516 Ninth Street
Sacramento, CA 95814-5512

All comments and materials filed with the Dockets Unit will be added to the facility Docket Log and be publically accessible on the Energy Commission's webpage for the facility.

If you have questions about this notice, please contact Christine Root, Compliance Office Manager, at (916) 654-4745, or by fax to (916) 654-3882, or via e-mail at Christine.Root@energy.ca.gov.

For information on public participation, please contact the Public Adviser, at (916) 654-4489 or (800) 822-6228 (toll-free in California) or send your e-mail to publicadviser@energy.ca.gov.

News media inquiries should be directed to the Energy Commission Media Office at (916) 654-4989, or by e-mail at mediaoffice@energy.ca.gov.

List Serve: DONALD VON RAESFELD POWER PLANT

AIR QUALITY
Jacquelyn Record

INTRODUCTION

The stored combustion turbine would not have any emissions, but when installed and operated, would fully comply with all emission limits. There would not be any additional modifications to any other components of the project and air emissions would be unchanged by the modifications. The proposed changes do not result in any significant adverse air quality impacts.

This Petition does not propose any changes to the currently existing Air Quality Conditions of Certification (conditions), but would require new conditions to describe the combustion turbine exchange. Staff proposes to add new conditions of certification, for the spare turbine (identified as **S6**), to the CEC's Final Decision for DVR based on what will be issued by the Bay Area Air Quality Management District (BAAQMD or District) Permit to Operate (PTO) and its associated engineering evaluation. The conditions ensure the spare turbine would be used on a temporary basis, including requiring operating limitations for the spare turbine that are the same as the other, already-permitted and operating combustion turbines (identified as **S1** and **S3**). Testing, monitoring, record keeping and reporting requirements on the spare turbine would also ensure compliance with air quality LORS. Since the emission limits are not changing, staff can recommend the final condition language even though BAAQMD has not issued the final PTO. This will help ensure a reliable supply of electricity from SVP.

Staff evaluated all proposed changes and found them consistent with all applicable LORS.

SCOPE OF ANALYSIS

The scope of this analysis is to determine whether the requested changes meet the criteria below pursuant to Title 20, California Code of Regulations, section 1769(a)(3)**.** The regulation reads as follows:

Staff, in consultation with the air pollution control district where the project is located, may approve any change to a condition of certification regarding air quality, provided:

I. *That there is no possibility that the change may have a significant effect on the environment, or the change is exempt from the California Environmental Quality Act;*

II. *That the change would not cause the project to fail to comply with any applicable LORS; and*

III. *That no daily, quarterly, annual or other emission limit will be increased as a result of the change.*

ANALYSIS OF IMPACTS

The facility currently operates the following sources pursuant to the CEC Final Decision:

- General Electric (GE) LM6000PC Natural Gas Combustion Turbine (473.7 one million British thermal unit per hour) (MMBtu/hr) (**S1**, and serial number (no.) DVR-191-498)
- Heat recovery steam generator (HRSG) with 137 MMBtu/hr of duct firing (**S2**)
- GE LM6000PC Natural Gas Combustion Turbine (473.7 MMBtu/hr) (**S3**, and serial no. DVR-191-502)
- HRSG with 137 MMBtu/hr of duct firing (**S4**)
- Wet 3-cell cooling tower at 34,980 gallons per minute (gpm) recirculating rate (**S5** exempt per BAAQMD regulations)

This PTA has requested to add:

General Electric (GE) LM6000PC Natural Gas Combustion Turbine (473.7 MMBtu/hr) (**S6**, and serial no. DVR-191-555). The combustion turbine exchange swaps out the turbine. The air intake and filters, noise abatement, HRSG, selective catalytic reduction (SCR), stack, emission monitoring and control systems are already installed on the existing operating trains.

In consultation with the BAAQMD, staff agrees with the proposed addition of conditions of certification in the draft PTO and the associated BAAQMD Engineering Evaluation received by staff on September 10, 2019. This draft PTO contains the permit conditions that ensure continued compliance with applicable federal, state, and local air quality requirements.

This analysis will evaluate each of the requested changes and determine whether each requested change meets all three criteria subparts established in CCR Title 20 Section 1769(a)(3)(B). The three criteria are shown above in the Scope of Analysis section, and will be herein addressed as Item (I) through Item (III).

Item (I)—Environment/CEQA Impact

The BAAQMD considers **S6** to be a new source per the District Regulation 2-1-232, even though it is not operating when stored onsite. The proposed turbine **S6** is identical to existing turbines **S1** and **S3**, and **S6** would be required to comply with the same existing permit condition and throughput limits that apply to **S1** and **S3**. Emissions from each combustion turbine/HRSG combination (**S1/S2** and **S3/S4**) are controlled with selective catalytic reduction (SCR) for nitrogen oxides (NOx as NO_2) to 2.0 parts per million (ppm) averaged over 1-hour and a carbon monoxide (CO) catalyst for control of CO at 4.0 ppm (1-hour) and precursor organic compounds (POCs) at 2.0 ppm.

Turbine **S6**, when installed as a replacement, would have the potential to emit more than 10 lb/day of NOx, CO, POC, and particulate matter 10 micrometers or less in diameter (PM10), particulate matter 2.5 micrometers or less in diameter (PM2.5), and therefore is subject to the Best Available Control Technology (BACT) requirements for these pollutants.

The current facility BACT requirements for the existing combustion turbines/duct burners are:

- NOx 2.0 ppm @ 15% O_2
- CO 4.0 ppm @ 15% O_2
- POC 2.0 ppm @ 15% O_2
- PM10 Public Utilities Code (PUC) Grade Natural Gas
- SO_2[1] PUC Grade Natural Gas (<=4 ppm Sulfur, 0.25 grains of sulfur (grs. S)/100 standard cubic feet (scf))
- NH_3[2] 10 ppm @ 15% O_2

BACT control systems currently installed at the facility are:

- Water injection on the turbines for primary control of NOx.
- SCR on the turbines/duct burners for secondary (final) control of NOx.
- Oxidation catalyst on the turbines/duct burners for control of CO and POC.
- Use of PUC Grade natural gas with sulfur content of 0.25 grs. S/100 scf is the BACT control for PM10, PM2.5 and SO_2.

NOx

NOx emissions from **S6** would be controlled by the same technologies as currently used on **S1** and **S3**: water injection and SCR. **S6** is a GE LM6000 unit, and it is expected to comply with the current permit NOx limit of 2.0 ppm @ 15% O_2. A review of BACT determinations at the EPA[3] RACT[4]/BACT/LAER[5] Clearinghouse, Air Resources Board (ARB) BACT Clearinghouse and recent projects reviewed by CEC staff did not identify any more stringent NOx emission limits. Therefore, 2.0 ppm NOx @ 15% O_2 satisfies the NOx BACT requirement for **S6**.

CO

In the BAAQMD's BACT analysis of **S6**, the District identified more stringent CO BACT emission limits as low as 1.5 ppm @ 15% O_2. However, those turbines are primary units, permitted to operate on a long-term basis year-round. **S6** is permitted to operate only when **S1** or **S3** is undergoing maintenance, which means **S6** would usually be used for a period of about three to four months every few years.

The District is in attainment for both the state and national ambient air quality standards for CO and no exceedances of those standards have been recorded at any of the District's monitoring stations since 1991.

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[1] sulfur dioxide
[2] ammonia
[3] Environmental Protection Agency
[4] Reasonably Available Control Technology
[5] Lowest Achievable Emission Rate

The District has therefore determined that BACT for CO for **S6** is the use of an oxidation catalyst, and a permit limit of 4.0 ppm CO @ 15% O_2, which is the same limit as the existing turbines (**S1** and **S3**). The existing CO catalysts on **S1**/**S2** or **S3**/**S4** trains would control CO emissions from **S6**. **S6** would comply with the current permitted CO limit of 4.0 ppm @ 15% O_2.

POC

Emissions control techniques used for CO also reduce POC emissions from combustion sources. The appropriate BACT control device or technique for CO is therefore also the BACT control device or technique for POC. POC emissions from **S6** would be controlled by the existing CO catalyst. **S6** would comply with the current permitted POC limit of 2.0 ppm @ 15% O_2.

PM10/PM2.5

BACT for PM10/PM2.5 from combustion turbines is the exclusive use of clean-burning natural gas. The facility has a permit condition to use only natural gas at **S1** and **S3**, and **S6** would be required to comply with the same requirement for BACT for PM10/PM2.5.

Offsets

Contemporaneous emission reductions that would occur from taking either **S1** or **S3** out of service for maintenance would provide full offsets for **S6**. Alternatively, the spare turbine would operate under the facility “emissions cap” that was offset when the facility was originally permitted. Therefore, any emission increases resulting from the operation of **S6** would be offset by the emission reductions from the shutdown of **S1** or **S3** during the maintenance period. There would be no expected change in operating hours as a result of this Petition and there would be no change in emission rates or emissions.

Item (II)—LORS

The requested proposed change in this Petition would not change any applicable requirements for this facility. The facility is expected to continue to comply with the same applicable requirements for each turbine, including the District Regulations (Regulation 6, Rule 1, Regulation 9, Rule 1, and Regulation 9, Rule 9) and Federal Regulations (New Source Performance Standards 40 CFR Part 60, Subpart GG (now KKKK), and Acid Rain Program 40 CFR Part 72). The project modification would not affect the project‘s ability to continue to comply with all LORS.

Item III—Emissions Limits

The Petitioner is requesting approval for the use of an identical spare natural gas-fired combustion turbine while maintenance activities are performed on either of the existing natural gas combustion turbines for DVR. The GE LM6000 turbines would be identical, with only minor unit-by-unit variations (SVE 2017). Operating with a like-kind turbine would not increase the actual or potential emissions at DVR because the exchange turbine would be abated with the existing control systems to the emissions levels summarized in Item (I). No changes to operating hours or facility heat rates would be expected to occur. Combustion turbine exchanges are often used to shorten maintenance outages without adverse effects on existing hardware, performance, safety or the environment. Therefore, there would not be any additional modifications to any other components of the DVR and air emissions would be unchanged by the modifications.

CONCLUSIONS

- With adoption of the new conditions of certification in this staff analysis, the project is expected to continue to comply with all applicable BAAQMD rules and regulations and would not have a significant effect on the environment.
- In consultation with the BAAQMD staff, CEC staff have reviewed an engineering evaluation along with the project's draft PTO, and the project would continue to comply with all applicable BAAQMD rules and regulations. The final BAAQMD permit for the project is not yet available, and is expected to be finalized by BAAQMD after the CEC renders a decision.
- The amended project would not result in any increase in emissions.

CONDITIONS OF CERTIFICATION CHANGES

Staff proposes the addition of new Air Quality Conditions of Certification **AQ-46** through **AQ-52**. The requested changes have been reviewed by BAAQMD staff and incorporated into a PTO; the final PTO is expected be issued by the end of September or October 2019. No changes are expected between the draft and final PTO. Staff proposes the addition of conditions of certification in order to bring CEC conditions of certification and the BAAQMD PTO into alignment. The following additions to the project's permit would not cause any additional air quality impacts or adversely affect the ability of the project to comply with LORS.

- With new conditions of certification **AQ-46** and **AQ-47**, any emission increases resulting from the operation of **S6** are expected to be fully offset by the emission reductions from the shutdown of **S1** or **S3** during the maintenance period. There would be no net increase in emissions as results of this facility modification.
- New condition of certification **AQ-48** would ensure that all regulatory requirements that apply to the other gas turbines (**S1** and **S3**) also apply to this spare turbine (**S6**).
- New condition of certification **AQ-49** would require the project owner to conduct District approved source tests on the spare combustion turbine **S6**, after initial start-up.
- New condition of certification **AQ-50** would require the project owner to demonstrate compliance with all regulatory requirements and permit conditions for the spare combustion turbine **S6** that apply to **S1** and **S3**.
- New condition of certification **AQ-51** would require the project owner to notify the District and Compliance Project Manager whenever the spare combustion turbine **S6** is placed in or taken out of service**.**
- The GE LM6000 combustion turbines at DVR are rated at 473.7 MMBtu/hr and are functionally identical units. When a turbine needs maintenance, SVP would use the spare turbine in its place until the serviced turbine is returned to be reinstalled. The CEC is requiring that each turbine should be documented by serial number and has included this in the proposed conditions. The two currently permitted turbines are under permit

#B4991 and have serial numbers of DVR 191-498 and DVR 191-502. The identical spare turbine has a serial number of DVR 191-555. New Air Quality condition of certification **AQ-52** would ensure the turbines would be appropriately identified during operations and for source tests.

AMENDED CONDITIONS OF CERTIFICATION

The following are a definition and new conditions to implement changes in this Staff Approved Proposed Change.

NEW TEMPORARY SOURCE

S-6 Temporary Combustion Gas Turbine (DVR 191-555), General Electric LM 6000 PC, natural gas fired, 49.4 MW (nominal), 473.7 MMBtu/hr maximum rated capacity; abated by **A1** Selective Catalytic Reduction System and **A2** Oxidation Catalyst or **A3** Selective Catalytic Reduction System and **A4** Oxidation Catalyst

CONDITIONS FOR S-6, TEMPORARY GAS TURBINE

AQ-46 The project owner shall only operate **S6** on a temporary basis when **S1** or **S3** is being repaired or maintained. (Basis: Cumulative Increase; offsets)

Verification: The project owner shall include in each quarterly report required by Condition of Certification **AQ-34** a log including each day when **S6** is used, documenting which turbine **S6** replaced along with the appropriate serial numbers, and a statement certifying that the turbine being replaced is not in operation at the same time **S6** is in operation.

AQ-47 The project owner shall not operate **S6** when both **S1** and **S3** are in operation. (Basis: Cumulative Increase; offsets)

Verification: The project owner shall submit documentation of compliance with this Condition of Certification or a statement certifying **S6** was not used for the quarter as part of the Quarterly Air Quality Report required by the verification of Condition **AQ-34**.

AQ-48 The project owner shall operate **S6** in compliance with all regulatory requirements and permit conditions that apply to **S-1** or **S-3**, except the source testing frequency specified in **AQ-31**. (Basis: Cumulative Increase; Offsets; BACT)

Verification: The project owner shall submit documentation of compliance with this Condition of Certification or a statement certifying **S6** was not used for the quarter as part of the Quarterly Air Quality Report required by the verification of Condition **AQ-34**.

AQ-49 Within 60 days of **S6** initial start-up and at least once every 8,760 hours of **S6** operation thereafter, the project owner shall conduct a District-approved source test on exhaust points **P-1** or **P-2** while **S-6** and associated Heat Recovery Steam Generator are operating at maximum load (including SPRINT power augmentation mode) to determine compliance with **AQ-20 (a)**, **(b)**, **(c)**, **(d)**, **(f)**, **(g)**, (h), and (i) while **S6** and associated Heat Recovery Steam Generator are operating at minimum load to determine compliance with **AQ-20 (c)** and **(d)**, and to verify the accuracy of the continuous emission monitors required in **AQ-27**.

The project owner shall test for (at a minimum): water content, stack gas flow rate, oxygen concentration, precursor organic compound concentration and mass emissions, nitrogen oxide concentration and mass emissions (as NO_2), carbon monoxide concentration and mass emissions, sulfur dioxide concentration and mass emissions, methane, ethane, and PM10 emissions including condensable particulate matter. Source test results shall be submitted to the District and the Energy Commission's CPM within 60 days of conducting the tests. [Basis: BACT]

<u>**Verification**</u>: Initial source testing shall be completed within 60 days of start-up. No later than 20 working days before the execution of the source tests, the project owner shall submit to the District and the CPM a detailed source test plan designed to satisfy the requirements of this Condition. The District and the CPM will notify the project owner of any necessary modifications to the plan within 20 working days of receipt of the plan; otherwise, the plan shall be deemed approved. The project owner shall incorporate the District and CPM comments into the test plan.

The project owner shall notify the District and the CPM within 7 working days prior to the planned source testing date.

Source test results shall be submitted to the District and the CPM within 60 days of the source testing date.

AQ-50 The project owner shall include all emissions from **S6** as part of **S1** or **S3** total emissions to demonstrate compliance with all regulatory requirements and permit conditions that apply to **S1** or **S3**. (Basis: Cumulative Increase; Offset)

<u>**Verification**</u>: The project owner shall submit documentation of compliance with this Condition of Certification as part of the Quarterly Air Quality Report required by the verification of Condition **AQ-34**.

AQ-51 The project owner shall notify the District's Director of Compliance and Enforcement Division, and the CPM in writing, no later than 24 hours of putting **S6** in service and taking **S6** out of service. The notification shall include

(a) Plant number;
(b) The date when **S6** is put in service or taken out of service;
(c) A brief description of the reason(s) to put **S6** in service. (Basis: Cumulative Increase; Offset)

<u>**Verification**</u>: The project owner shall submit documentation of compliance with this Condition of Certification or a statement certifying **S6** and the associated serial number was not used for the quarter as part of the Quarterly Air Quality Report required by the verification of Condition **AQ-34**.

AQ-52 The project owner shall maintain the following records on site for a minimum of 5 years and make them available to the District and the CEC CPM upon request:

a) Identify the turbine(s) in operation and in source tests by their serial number(s) for **S1** (DVR 191-498), **S3** (DVR 191-502), and **S6** (DVR 191-555). (Basis: Cumulative Increase)

b) The starting and ending dates and times when **S1** or **S3** is being taken out of service for repair, inspection, maintenance, or other activity deemed necessary by the project owner.

c) A description of each activity required under **AQ-52(b)**.

d) A copy of any notification required under **AQ-51**.

(Basis: Cumulative Increase; Regulation 2-6-501)

<u>Verification</u>: The project owner shall maintain documentation of compliance with this Condition of Certification for a minimum of 5 years, and submit statement certifying **S6** and the associated serial number was not used for the quarter as part of the Quarterly Air Quality Report required by the verification of Condition **AQ-34**.

REFERENCES

BAAQMD 2019, Bay Area Air Quality Management Engineering Evaluation and draft Permit to Operate for Donald Von Raesfeld Power Plant, received September, 2019.

CEC 2003a, California Energy Commission Final Staff Assessment Pico Power Project, (02-AFC-03C), 26 March 2003 (TN #: 28413)

CEC 2003b, California Energy Commission Final Commission Decision on the Application for Certification of Pico Power Project (02-AFC-3), September 2003 (TN #: 29899)

SVE 2017, Silicon Valley Power, Petition to Amend for Approval to Use Spare Turbine During Maintenance of Existing Turbines, August 2017, Docket No. 02-AFC-3C (TN #: 220761)