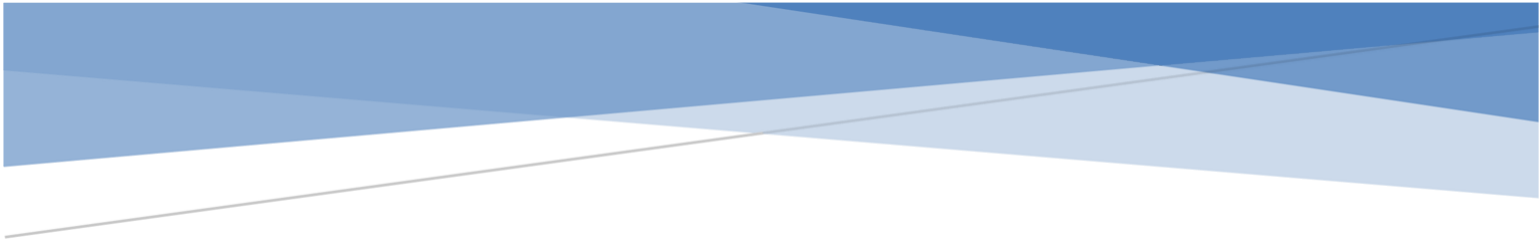


<b>DOCKETED</b>	
<b>Docket Number:</b>	19-SPPE-02
<b>Project Title:</b>	Walsh Data Center
<b>TN #:</b>	230764
<b>Document Title:</b>	WP LLC Supplemental Response to DR-8
<b>Description:</b>	N/A
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# SUPPLEMENTAL RESPONSES TO CEC STAFF DATA REQUEST SET 1 (DR - 8)

Walsh Backup Generating Facility (19-SPPE-02)

SUBMITTED TO: CALIFORNIA ENERGY COMMISSION

SUBMITTED BY: **651 Walsh Partners, LLC**

November 2019



**WP, LLC'S SUPPLEMENTAL RESPONSE TO CEC DATA REQUEST SET 1 (DR-8)  
WALSH BACKUP GENERATING FACILITY (19-SPPE-02)**

**INTRODUCTION**

Attached is 651 Walsh Partner, LLC's (WP, LLC) supplemental response to California Energy Commission (CEC) Staff Data Request Set No. 1, Data Request 8. For context the text of the Background and Data Request precede each Data Response.

**AIR QUALITY**

***BACKGROUND CUMULATIVE AIR QUALITY IMPACTS***

***The application does not include a complete cumulative air quality modeling analysis. The cumulative analysis should include all reasonably foreseeable new projects with a potential to emit 5 tons per year or more and located within a 6-mile radius of WDC. This includes all projects that have received construction permits but are not yet operational and those that are either in the permitting process or can be expected to be in permitting in the near future.***

***A complete cumulative impacts analysis should identify all existing and planned stationary sources that affect the baseline conditions and consider them in the modeling effort. Staff needs a cumulative modeling analysis, or additional justification why an air quality cumulative modeling analysis is not needed for this project, to complete the staff analysis for cumulative air quality impacts.***

**DATA REQUESTS**

8. Please provide the cumulative impact modeling analysis, including WDC and other identified new and planned projects within 6 miles of the WDC site.

**RESPONSE TO DATA REQUEST 8**

WP, LLC requested information from the Bay Area Air Quality Management District (District) that would be necessary to conduct the cumulative air quality impact modelling analysis outlined by Staff. The BAAQMD will not provide information on new facilities not yet permitted or operational until after the final permit is obtained for those projects. As noted, new applications with the requested emissions limits can be quite different than the final permit allows and the BAAQMD does not want to provide incomplete/unfinished data. Therefore, WP, LLC cannot perform the analysis outlined by Staff. However, WP, LLC does not believe the analysis outlined by Staff is the only method by which the Commission can analyse whether project operations would result in a cumulatively considerable net increase of any criteria pollutant and whether this impact would be significant.

In order to be responsive to this request, WP, LLC submits the following analysis, which uses the exact methodology employed in the Staff Proposed Initial Study/Mitigated Negative Declaration (August 2019) for the Laurelwood Data Center Project, (TN 229584). This methodology is also consistent with the Final Decision in the McLaren Data Center Project (TN 225970).

Table DR 8-1 provides the annual criteria pollutant emission estimates for project operation using the emissions source assumptions noted above. Table DR 8-1 shows that with NOx emissions from the testing of the standby generators fully offset through the permitting process with the BAAQMD, the project would not exceed any of the BAAQMD operation emissions significance thresholds. The BAAQMD significance thresholds for daily emissions are daily average values that multiply to equal the annual thresholds, so a separate comparison of the project's average daily emissions versus the BAAQMD average daily significance thresholds is unnecessary.

**TABLE DR 8-1 ANNUAL CRITERIA POLLUTANT EMISSIONS FROM PROJECT OPERATION**

Source Type	Annual Emissions (tpy)					
	ROG	CO	NOx	SO2	PM10	PM2.5
Miscellaneous Operational Emissions associated with the Facility (mobile, energy, area, waste, and water)	2.1	1.9	1.05	.0084	0.51	0.17
Emissions from Diesel Storage Tanks	< .1	--	--	--	--	--
Standby Generators (Testing Only)	2.33	20.2	34.9	.039	.078	.078
Proposed Offsets (Reg 2 Rule 2, 302) 1:1 Ratio	--	--	-34.9	--	--	--
Total Mitigated Emissions	4.53	22.1	1.05	.047	.59	.25
BAAQMD Annual Significance Thresholds	10	--	10	--	15	10
Mitigated Emissions Exceed BAAQMD Threshold? (Y/N)	No	N/A	No	N/A	No	No

Offset ratio is 1:15 with NOx >35tpy

Source: ADI 2019

Table DR 8-1 shows that the project would not be expected to result in a cumulatively considerable net increase of nonattainment criteria pollutants during the operational lifetime of the project, including routine testing and maintenance of the standby engine generators. Therefore, project operations would not result in a cumulatively considerable net increase of any criteria pollutant, and this impact would be less than significant.