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CALIFORNIA ENERGY COMMISSION

December 6, 2019

C1-Santa Clara, LLC
c/o Scott Galati
1720 Park Place Drive
Carmichael, CA 95608

Re: Data Requests for the Sequoia Data Center (19-SPPE-03)

Dear Mr. Galati:

Pursuant to Title 20, California Code of Regulations, sections 1941 and 1716, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 3 necessary for a complete staff analysis of the Sequoia Data Center project.

Responses to the data requests are due to staff within 30 days. To facilitate an expedited review, staff requests written responses to the enclosed data requests on or before December 16, 2019.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Committee within 20 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see Cal. Code Regs., tit. 20, § 1716 (f)).

If you have any questions, please call me at (916) 651-0966, or email me at leonidas.payne@energy.ca.gov.

Leonidas Payne
Project Manager

Enclosure

BACKGROUND: Follow-up to Supplemental Response to DR 89 (TN 230893)

On December 2, 2019, the applicant for Sequoia Data Center (SDC) docketed a Supplemental Response to DR 89, TN 230893, an engineering drawing of undergrounded 6,800-gallon fuel storage tanks associated with each proposed genset. The engineering drawing only shows one perspective of the project site, with only seven (7) out of the fifty-four (54) gensets shown in the drawing.

Staff needs to quantify construction emissions associated with undergrounding the genset fuel storage tanks. Staff also needs an updated project description for the underground fuel tanks, including the timeframe for this new construction phase.

Further, Staff needs to verify whether air quality and public health impact modeling would need to be updated to reflect the potentially lower stack heights for the generator engines.

DATA REQUESTS

106. Please provide updated construction emissions of CO, VOCs, NOx, SO_2, PM10 and PM2.5 (including fugitive emissions) associated with the new underground storage tank basin at SDC and compare these totals to the BAAQMD CEQA thresholds.
107. Please identify the construction equipment and number of trucks for hauling excavated material that would be used during construction of the underground fuel storage tank basins and during transportation of excavated material.
108. Please describe the dimensions of the concrete basin that would be necessary for the underground fuel storage tanks, including depth and volume of excavated material.
109. Please include an updated project description to include the underground fuel storage tank basins, and the operation and maintenance of the underground basins.
110. Please revise the health risk assessment (HRA) to incorporate the additional construction emissions associated with the underground fuel storage tank basin.
111. Please submit an updated air quality impacts analysis that includes the emissions during the construction of the underground fuel storage tank basins.
112. Please confirm neither the stack exit height nor elevation would change because of this facility redesign.
113. If the exit or release height of the engine exhaust stack would change, please provide a revised air quality and public health impacts analysis.

BACKGROUND: Follow-up questions to Data Responses Set 2 (TN 230348) DR 103, 104, and 105

Staff asked in Data Requests Set 2 for the City of Santa Clara's analysis of the project's compliance with the San Jose International Airport's Comprehensive Land Use Plan (CLUP), due to the project's proposed above-ground fuel storage in the Turning Safety Zone and Inner Safety Zone, which is prohibited per Policy S-4 of the CLUP. In Data Responses Set 2, the applicant stated that a planning application was provided to the City of Santa Clara, and that a copy of the City's analysis of project compliance with the CLUP would be provided once available.

Since then, the proposed project has been changed to show submerged fuel storage in an attempt to bring the project into compliance with Policy S-4 of the CLUP. However, staff does not have verification from the City of Santa Clara or the Airport Land Use Commission (ALUC) that the project modifications are fully in compliance with the CLUP. This information is needed in order to reach conclusions regarding potential for environmental impact in the Transportation, Land Use, and Hazardous Materials sections.

DATA REQUEST

114. Please provide documentation from the City of Santa Clara and the ALUC evaluating the modified project's compliance with the CLUP.

BACKGROUND: Evaluation of FAA Airspace Obstruction

Staff needs to confirm that the project's height does not obstruct any protected FAA surfaces in order to reach conclusions regarding potential for environmental impact in the Transportation, Land Use, and Hazardous Materials sections. Each of these sections has CEQA checklist items that require an evaluation of whether the project obstructs FAA surfaces. During a November 8, 2019, phone call between staff and project representative Scott Galati regarding informational items needed for evaluation of the project, Mr. Galati acknowledged that the project's proximity to the airport and its height require FAA notification. He stated that the applicant's aviation group found no project obstruction of airspace, and that the applicant would file an FAA notification (Form 7460) with the FAA along with a copy of the aviation group's report showing no obstructions.

DATA REQUEST

115. Please provide staff with a copy of the aviation group's airspace evaluation report and a copy of the FAA filing.

BACKGROUND: Follow-up questions to Data Responses Set 1 (TN 229737) DR 10

The emissions estimations shown in the CalEEMod output files (attached to the responses as part of Appendix B in Appendix AIR DR-29 of TN 229938-2) do not appear to include emissions from hauling trips. Staff needs to confirm that heavy-duty haul truck emissions have been properly quantified, as they relate to delivering building materials to the site, removing debris, and hauling-off excavated material.

DATA REQUEST

116. Please summarize the quantities of heavy-duty haul truck trips anticipated during construction and verify that haul truck emissions have been included in the construction emissions estimates. Please combine the response with DRs 106-107, above.

BACKGROUND: Follow-up questions to Data Responses Set 1 (TN 229737) DR 37

Staff is not able to locate the meteorological (met) data files on the Air Quality Data Response CD. Staff needs to confirm that these files were processed by BAAQMD using AERMET version 18081.

DATA REQUEST

117. Please provide the processed BAAQMD AERMET version 18081 met files.

BACKGROUND: Follow-up questions to Data Responses Set 1 (TN 229737) DR 42 and 27

In response to DR 42, the applicant states that the NO_2 California Ambient Air Quality Standards (CAAQS) analysis included the overall 1-hour maximum background concentration. However, in looking at the modeling input and output files provided, staff found the worst-case 1-hour NO_2 CAAQS impact of 310 $\mu g/m^3$ shown on page 20 (response to DR 27) of the Data Responses Set 1 (TN 229938) was from genset SWEG01 itself, not including background NO_2 concentration (i.e., AERMOD source: "C1SWEG01" at 75% load in filename: "c1.sc.no2.5y.c1sweg01.075.1hr.1st.plot").

DATA REQUEST

118. Please revise the modeling to include the background to assess compliance with the 1-hour NO_2 CAAQS.