

DOCKETED

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Project Title:	SMUD Cosumnes Power Plant - Compliance
TN #:	233083
Document Title:	Cosumnes Power Plant - AQ-10 Correction
Description:	Memo to Commission to correct Condition of Certification AQ-10.
Filer:	Mary Dyas
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Memorandum

To: Commissioner David Hochschild, Chairman
Commissioner Janea A. Scott
Commissioner Karen Douglas
Commissioner J. Andrew McAllister
Commissioner Patty Monahan

Date: May 22, 2020
Telephone: (916) 651-8891

From: Mary Dyas, Compliance Project Manager
Siting Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street
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Subject: **Cosumnes Power Plant, Correction to AQ Condition of Certification AQ-10**

Through this memo, staff seeks to inform the Commission of an error recently discovered in a condition of certification and for the Commission approval to change the condition of certification to correct the error.

In December 2018, the California Energy Commission approved a petition to amend (PTA) for the Cosumnes Power Plant, owned by the Sacramento Municipal Utility District. Commission Order 18-1210-04 (TN 226231) included the modified Air Quality conditions of certification from the Staff Analysis (TN 225863). The section of the Staff Analysis addressing air quality included analysis and related tables which evidenced that the proposed facility upgrades would increase hourly, daily and quarterly SOx emissions. These increases were found not to be significant and were consistent with changes in the emissions limits set forth in the Air District permit. The Commission order approving the petition acknowledges that increased air emission limits are commensurate with the permitted increased fuel consumption.

While the Maximum Allowable Emissions table correctly displayed the increased SOx emissions in the analysis section of the Staff Analysis, the table was incorrectly transcribed in condition of certification AQ-10 by displaying the old SOx value. Thus, the emission limits proposed by the project owner and analyzed by staff were not correctly reflected in the conditions of certification section of the Staff Analysis.

To correct this error, staff requests approval to update AQ-10 by correcting the table in the most recent version of the facility's conditions of certification maintained by the Compliance and Enforcement Office and by filing into the project docket this memo and the Commission order so there will be a clear record of the correction.

Below is the modified Condition of Certification AQ-10. Bold underline is used to indicate new language. Strikethrough is used to indicate deleted language. There is no change to the verification.

AQ-10 Emissions from the following equipment must not exceed the following emission limits, including periods containing start-ups, shut-downs or short term excursions as defined in **AQ-14**. [Basis: SMAQMD Rule 202]

**Maximum Allowable Emissions
 (Lbs/Quarter)**

Pollutant	Q1	Q1	Q2	Q2	Q3	Q3	Q4	Q4
	CT No. 2	CT No. 3						
NOx	31,010	31,010	31,321	31,321	31,632	31,632	31,632	31,632
CO	73,965	73,965	74,343	74,343	74,722	74,722	74,722	74,722
VOC	7,403	7,403	7,479	7,479	7,555	7,555	7,555	7,555
SOx	<u>4,126</u> 3,095	<u>4,126</u> 3,095	<u>4,171</u> 3,130	<u>4,171</u> 3,130	<u>4,217</u> 3,164	<u>4,217</u> 3,164	<u>4,217</u> 3,164	<u>4,217</u> 3,164
PM10/2.5	19,440	19,440	19,656	19,656	19,872	19,872	19,872	19,872

**Maximum allowable emissions
 Gas Turbine No. 2, Gas Turbine No. 3, Perlite Storage Silo Dust Collector and
 Cooling Tower Combined**

Pollutant	Qtr 1 lbs/quarter	Qtr 2 lbs/quarter	Qtr 3 lbs/quarter	Qtr 4 lbs/quarter	Total tons/year
NOx	62,021	62,643	63,265	63,265	96.0
CO	147,929	148,687	149,444	149,444	123.1
VOC	14,807	14,958	15,110	15,110	30.0
SOx	8,252	8,342	8,434	8,434	16.7
PM10/2.5 ^a	40,138	40,584	41,030	41,030	81.4

(a) Values reflect changes to cooling tower TDS change and perlite storage silo addition.

Verification: As part of the quarterly and annual compliance reports, the project owner shall include information on the date, time, and duration of any violation of this permit condition.