

**DOCKETED**

<b>Docket Number:</b>	81-AFC-01C
<b>Project Title:</b>	Compliance - Application for Certification of the Occidental Plant # 1
<b>TN #:</b>	234055
<b>Document Title:</b>	Email - Calistoga Diesel Public Health Risk
<b>Description:</b>	Conversation on Calistoga Diesel Public Health Risk
<b>Filer:</b>	Susan Fleming
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	7/29/2020 3:57:39 PM
<b>Docketed Date:</b>	7/29/2020

## One more docket for Calistoga

Chu, Ann@Energy <Ann.Chu@energy.ca.gov>

Tue 7/28/2020 2:12 PM

To: Veerkamp, Eric@Energy <Eric.Veerkamp@energy.ca.gov>

Hi, Eric,

Could you please docket my email conversation with Doug from LCAQMD? I am waiting for this reference to finish my write-up. Thanks.

Ann

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**From:** Doug Gearhart <[dougg@lcaqmd.net](mailto:dougg@lcaqmd.net)>

**Sent:** Tuesday, July 21, 2020 3:25 PM

**To:** Chu, Ann@Energy <[Ann.Chu@energy.ca.gov](mailto:Ann.Chu@energy.ca.gov)>

**Cc:** Fletcher, Nancy@Energy <[Nancy.Fletcher@energy.ca.gov](mailto:Nancy.Fletcher@energy.ca.gov)>

**Subject:** Re: Calistoga HRA

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Ann

1. Just to clarify, the risk prioritization was done based on the current adopted policy in Lake County. We have not adopted the 7700 normalization factor, as we need to update all facilities when we do this. At this time, we do not have staffing to do this work so we continue to utilize the 1700 normalization factor until we can update our whole system. The 7700 factor is not mandatory, but is a recommended update to the prioritization scoring that can be adopted and implemented. So we will get there eventually, but we are not there at this time. In this case, the difference in risk being 0.01 to 0.023, there are no concerns with either number. Our first trigger for risk would be 10 in a million, with denial of the permit at 20 in a million.

2. We utilize 200 hours per year total operations projected, with the assumption of 50 hours per year for testing and maintenance. We believe this is a more reasonable annual estimate for actual maximum projected usage. The unlimited hours for emergency use in the ATCM do not change that we have to limit the use based on potential risk. As such we typically analyze the source based on the projected maximum usage, even though they can use the engine more than 200 hours in an emergency, we generally don't anticipate this to occur.

3. Limiting testing and maintenance to 50 hours is consistent with our permit and the ATCM.

Thanks,

Doug

Douglas Gearhart, APCO  
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[dougg@lcaqmd.net](mailto:dougg@lcaqmd.net)

On Jul 21, 2020, at 1:56 PM, Chu, Ann@Energy <[Ann.Chu@energy.ca.gov](mailto:Ann.Chu@energy.ca.gov)> wrote:

Hi, Doug,

I am doing the Public Health for the Calistoga emergency wet-down pump engine amendment. I received two documents from the Project Owner (please see the attachment), and I have some questions and clarifications:

1. The screening HRA in Table 4 was based on estimated emissions for 200 hours per hour and the emission is 9.98 lbs/yr. However, the Normalization Factor should be 7700, not 1700. I recalculated by using 7700, and the result is 0.023.
2. The screening HRA in Attachment 3 Air Emission Calculations and Health Risk Review was based on 50 hours per hour and the emission is 2.5 lbs/yr.
3. I finally decided to use the results of Attachment 3, not Table 4. That's because engine testing and maintenance operations would be limited to 50 hours per year.

Please let me know if there is any misunderstanding, and I would like to confirm that It's ok to use 50 hours per year. Thanks.

Ann

<image001.png>

**Huei-An (Ann) Chu, Ph.D.**  
Air Resources Engineer  
**California Energy Commission**  
1516 Ninth Street, MS-46  
Sacramento, CA 95814  
(916) 651-0965  
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**From:** Fletcher, Nancy@Energy <[Nancy.Fletcher@energy.ca.gov](mailto:Nancy.Fletcher@energy.ca.gov)>

**Sent:** Tuesday, July 21, 2020 1:21 PM

**To:** Chu, Ann@Energy <[Ann.Chu@energy.ca.gov](mailto:Ann.Chu@energy.ca.gov)>

**Subject:** FW: Calistoga

Do you want to email Doug the question?

Nancy Fletcher  
STEP Division –Engineering Office  
(916) 651-9855

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**From:** Doug Gearhart <[dougg@lcaqmd.net](mailto:dougg@lcaqmd.net)>

**Date:** Tuesday, July 21, 2020 at 1:12 PM

**To:** "Fletcher, Nancy@Energy" <[Nancy.Fletcher@energy.ca.gov](mailto:Nancy.Fletcher@energy.ca.gov)>

**Subject:** Re: Calistoga

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I'm on meetings today, but if you can send me the question, then I can look into it and be able to answer the question.

I can probably fit a call in Thursday or Friday. I may be able to call later today, if things clear up.

I'll send you the current permit for the power plant as soon as I can.

Doug

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On Jul 21, 2020, at 1:04 PM, Fletcher, Nancy@Energy <[Nancy.Fletcher@energy.ca.gov](mailto:Nancy.Fletcher@energy.ca.gov)> wrote:

Hello Doug,

I am currently processing the Calistoga emergency wet-down pump engine amendment. In this process, I am updating the current CEC license to reflect the current LCAQMD requirements. Could you please send me all the current LCAQMD permits for the Calistoga geothermal plant?

In addition, our public health analyst has a quick question for you regarding the risk assessment performed for the wet-down pump engine evaluation. Is there a good time to have a quick phone call later this week or next week? I don't expect it would last long. Do you have access to Teams?

Hope you are doing well and staying healthy.

**Nancy Fletcher -Air Resources Engineer**  
**Siting, Transmission, and Environmental Protection Division**

**California Energy Commission**

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<Table 4.pdf><Attachment 3.pdf>

