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State of California
State Energy Resources Conservation and Development Commission

In the matter of:	
Sequoia Data Center	Docket 19-SPPE-03

Intervenor Sarvey Position on Disputed Issues

In the notice of committee conference issued on December 8, 2020 the commission directed the parties to meet and confer, and invite participation by CARB and BAAQMD, to determine whether any of the outstanding issues identified in the Order can be resolved among the parties and what issues remain in dispute. The following is the position of Intervenor Robert Sarvey on issues that remain in dispute.

A. Is the Applicant's modeling, relied upon by Staff in the IS/PMND, adequate for the analysis of NO_2 impacts from routine testing and maintenance operations? If not, describe why the analysis is not adequate and what would cure the described inadequacies?

N0. The existing record contains ambient air quality data from 2018. In the applicant's and staff's analysis the 2018 air quality data was not utilized in determining NO_2 and PM 2.5 air quality impacts.

In the IS/MND the modeling for the CAAQS 1-hour NO2 impacts analysis used a seasonal hour of day background. When modeling compliance with the state 1-hour NO2 standard, the maximum modeled 1-hour NO2 impact for the proposed project should be added to the maximum 1-hour NO2 background level for the project area. A seasonal hour of the day background value should not be used for background for the California NO2 standard.

According to the IS/MND the results provided in **Table 5.3-8 (Sequoia Maximum Impacts During Readiness and testing below)** are the maximum impacts determined at any point at the project fence line or beyond. Impacts inside the fence line should be reported as well to protect employees engaged in landscaping, gardening and facility repair. It is also important to evaluate impacts at nearby facilites as their workers could be exposed to unsafe air quality levels. An isopleth would provide the necessary information. BAAQMD required Microsoft's Santa Clara Data Center to reduce hours of operation due to unhealthy air quality levels inside their fence line and at adjacent facilities as demonstrated in Exhibit 1 of this submission.

TABLE 5.3-8 SEQUOIA MAXIMUM IMPACTS DURING READINESS TESTING AND MAINTENANCE-TESTING ONLY (µg/m³)

Pollutant	Averaging Time	Project Impact	Background	Total Impact	Limiting Standard	Percent of Standard
PM10	24-hour	0.76	**69.8**	**70.6**	**50**	**141%**
	Annual	0.05	**21.9**	**22.0**	**20**	**110%**
PM2.5	24-hour	0.58	31.0	31.6	35	90%
	Annual	0.05	10.6	10.7	12	89%
CO	1-hour	3,053	2,748	5,801	23,000	25%
	8-hour	1,967	2,061	4,028	10,000	40%
NO_2	State 1-hour [a]	---	---	333	339	98%
	Federal 1-hour [b]	---	---	187	188	99%
	Annual	13.2	24.1	37.3	57	65%
SO_2	State 1-hour	0.21	9.4	9.6	655	1%
	Federal 1-hour	0.19	6.1	6.3	196	3%
	24-hour	0.08	2.9	3.0	105	3%

Notes:
Concentrations in **bold** type are those that exceed the limiting ambient air quality standard.
Results are the worst-case impact of a single generator in use because only a single generator would operate at a given time for testing and maintenance.
The federal 24-hour PM2.5 background of 31.0 µg/m³ is based on 98th percentile averaged over 3 years of recent data (2015-2017) excluding 2018.
[a] For CAAQS 1-hour NO_2 impacts, this is the project impact and seasonal hour of day background for source "C1SWEG01" at a 75% load; staff reports the highest 1-hour NO_2 modeled result (on 5/12/2017).

b. Can scenario modeling be used to bound a range of potential impacts from emergency operations? Are there other options to assess impacts of emergency operations? If so, how long will it take to perform those options?

From discussions at the meet and confer the applicant's attorney explained that under emergency operation all generators are operating equally to support the data center load. Previously staff had identified a problem with modeling assumptions because they would not know what engines were operating.

Another problem that had been previously discussed is what background should be used for the modeling. BAAQMD declared a record 30 straight days of spare the air days this year. In total so far BAAQMD has declared 44 spare the air days.[1]

At the meet and confer CEC Staff requested that the applicant model the PM 2.5 impacts from emergency operations. I support CEC Staff's request for the modeling of PM 2.5 impacts during emergency operations. So far in 2020 BAQMD has set a record of 25 exceedances of the national 24 hour PM 2.5 standard.

Cumulative impacts

The notice of committee conference does not ask the parties to address the approval by the energy commission of over 450 megawatts of diesel backup engines at McLaren, Laurelwood, Mission College and the Walsh data centers. All of these engines have been sited without any consideration of the other data center generators which number in the 100's of megawatts.

Greenhouse Gas Impacts

Additional analysis of the significance of the projects GHG emissions and the cumulative impact of the energy commission's four other data centers is required to comply with CEQA. Requiring the applicant to enroll in the SVP's green power program would eliminate any significant GHG impacts.

[1] https://www.sparetheair.org/understanding-air-quality/data-and-records/pm-data