

**DOCKETED**

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<b>Project Title:</b>	Fountain Wind Project
<b>TN #:</b>	250293
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<b>Description:</b>	N/A
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<b>Organization:</b>	Stantec Consulting Services, Inc.
<b>Submitter Role:</b>	Applicant Consultant
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Data Request Identifier	Request Source	Topic	Reviewer	Siting Regulations	Information	Opt-In Page Number And Section Number	Adequate	Information Required To Make OPT Conform With Regulations	Response Date	Applicant Response	Status
AIR-001	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Background: Construction and Operational Emissions and Assumptions - The construction and operational emission estimates and assumptions provided in the DEIR were based on the first revision to the original project proposal from 2019 (published by Shasta County in July 2020). The current proposal would, among other things, reduce the number of wind turbines being constructed from 72 to 48, decrease the permanent disturbance area from 180 acres to 120 acres, reduce the vehicle and equipment miles traveled on onsite unpaved roads and access roads, reduce the number of turbine deliveries from the port, and other proposed changes that could reduce or change the construction and operational related emissions. Request: Construction and Operational Emissions and Assumptions - Please update the construction and operational related emission estimates to reflect the emissions that would be generated from the currently proposed project. Please provide a detailed construction schedule that explains the activities that would occur during each phase of construction, including a description of how long construction would occur at each wind turbine tower pad, whether the turbines and pads would be installed one at a time or in groups, and whether construction activities would be occurring continuously throughout the entirety of the project site or if construction activities would move throughout the site as completion of the installation of the turbines and pads are completed. This will help staff identify when and where construction related impacts are occurring and for how long. Please provide the locations and	23-May	Construction emissions have been updated to account for the reduction in project size, accounting for the 33% reduction in wind turbines and disturbance area. Construction activities would be occurring continuously throughout the site and would not be constructed one-by-one. Updated modeling output files (including updated excel spreadsheets [TN#250274] and CalEEMod output files) and a discussion regarding updated inputs are provided (TN# 250273).	submitted

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								distances of sensitive receptors with respect to these activities. Please provide a detailed discussion on all assumptions used to generate the updated construction and operational emission estimates. Please update all aspects of DEIR Appendix B Air Quality and Greenhouse Gas Emissions as necessary based on the revised project description. Please provide the Excel spreadsheets with live, embedded calculations so staff can verify the emission estimates and assumptions.			
AIR-002	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Background: Emergency Generator - The project would utilize a 268 horsepower (hp) emergency generator that would operate for testing and maintenance purposes. The emergency generator would require a permit to operate (PTO) from the Shasta County AQMD. Energy Commission staff will need to incorporate portions of the Shasta County AQMD engineering evaluation and PTO into its EIR. Request: Emergency Generator - Please provide a completeness determination from the Shasta County AQMD confirming that the district has everything it needs to complete its review of this project and provide an engineering evaluation and permit to operate.	23-May	An application for an Authority to Construct will be submitted to Shasta County AQMD. The Applicant will provide a determination of completeness once it is available from SCAQMD.	submitted
AIR-004	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291- 4)	Yes	N/A	N/A	N/A	N/A
AIR-005	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	N/A	Yes	N/A	N/A	N/A	N/A

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AIR-006	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO2, CH4, N2O, and SF6) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	Yes	N/A	N/A	N/A	N/A
AIR-007	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode. A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	N/A	Yes	N/A	N/A	N/A	N/A
AIR-008	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (F)(ii)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	N/A	Yes	N/A	N/A	N/A	N/A
AIR-009	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (G)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	Yes	N/A	N/A	N/A	N/A
AIR-010	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (H)	Not included	Not included	No	If it's determined that an air quality modeling analysis is required under Appendix B (g)(8)(l)(i) or Appendix B (g)(8)(l)(ii) below, then please provide the meteorological data approved by the California Air Resources Board or the local air pollution control district.	23-May	An ambient air quality analysis is not required under Appendix B (g)(8)(l)(i) and Appendix B (g)(8)(l)(ii) and as such, meteorological data is not required to conduct analysis.	submitted

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AIR-011	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	N/A	Yes	N/A	N/A	N/A	N/A
AIR-012	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Not included	No	If it's determined that an air quality modeling analysis is required under Appendix B (g)(8)(I)(i) or Appendix B (g)(8)(I)(ii) below, then please provide the meteorological data with the information required under Appendix B (g)(8)(H)(ii).	23-May	An ambient air quality analysis is not required under Appendix B (g)(8)(I)(i) and Appendix B (g)(8)(I)(ii) and as such, meteorological data is not required to conduct analysis.	submitted
AIR-013	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (I) (i)	An evaluation of the project's direct and cumulative air quality impacts, consisting of: A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM10) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NOx), sulfur dioxide (SO2), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM10) and particulate matter less than 2.5 microns in diameter (PM2.5) from construction-related equipment;	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Provide the air quality modeling analysis to determine construction related impacts consistent with the revised construction emission estimates and assumptions as requested under Appendix B (g)(8)(A) requirements above. Otherwise, provide a detailed justification of why such modeling isn't required for this project based on the revised construction emission estimates and assumptions as requested under Appendix B (g)(8)(A) requirements above.	23-May	Please see updated air quality modeling analysis (TN# 250273).	submitted
AIR-014	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NOx, SO2, CO, PM10, and PM2.5) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Provide the air quality modeling analysis for the readiness testing and maintenance of the 268 hp emergency generator. Otherwise, provide a detailed justification of why such modeling isn't required for this project. Including a description of the engine location on the site, the distance to sensitive receptors, etc.	23-May	Emission calculations for the 268 hp emergency generator are included in the updated air quality modeling analysis (TN# 250273).	submitted

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AIR-015	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (I) (iii)	modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions; A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NOX, SO2, CO, PM10, and PM2.5.	N/A	Yes	N/A	N/A	N/A	N/A
AIR-016	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (I) (iv)		N/A	Yes	N/A	N/A	N/A	N/A
AIR-017	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (J) (i)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide: The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	N/A	N/A	N/A	N/A	N/A	N/A
AIR-018	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (J) (i)		N/A	Yes	N/A	N/A	N/A	N/A
AIR-019	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	N/A	Yes	N/A	N/A	N/A	N/A
AIR-020	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas	Yes	N/A	N/A	N/A	N/A

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						Emissions (TN 248291-4)					
AIR-021	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12)	No	Please provide the tables and information required by Appendix B (i)(1)(A) related to air quality.	12-Apr	Updated LORS Consistency Matrix (TN#249636) provided April 12, 2023.	submitted
AIR-022	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities. The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12)	No	Please provide the information required by Appendix B (i)(1)(B), including the contact information to the permit engineer from the Shasta County AQMD assigned to this project.	3-Apr	Table of applicable permits, agency contact information, and the schedule to obtain legally binding enforceable agreement(s) with community-based organizations and/or permitting entities was submitted on April 3, 2023 (TN# 249533).	closed out
AIR-023	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.		Yes	N/A	3-Apr	Table of applicable permits, agency contact information, and the schedule to obtain legally binding enforceable agreement(s) with community-based organizations and/or permitting entities was submitted on April 3, 2023 (TN# 249533).	closed out
AIR-024	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Not specified	No	Please provide a schedule indicating when the necessary permits from the Shasta County AQMD will be obtained.	3-Apr	Table of applicable permits, agency contact information, and the schedule to obtain legally binding enforceable agreement(s) with community-based organizations and/or permitting entities was submitted on April 3, 2023 (TN# 249533).	follow-up response ongoing