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Document Title:	Errata to Staff Analysis
Description:	Errata to Staff Analysis (TN 259209)
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California Energy Commission Memorandum

To: Docket 07-AFC-06C

From: Anwar Ali
Compliance Project Manager
Compliance Monitoring and Enforcement

Date: November 24, 2024

**Subject: Carlsbad Energy Center Project (07-AFC-06C)
ERRATA: CEC Staff Analysis of Petition to Amend the Final Commission Decision**

*****Please note the highlighted change in Condition of Certification AQ-37, AQ-49, AQ-50, AQ-95, and AQ-99 below.*****

Background:

In its staff assessment docketed on September 18, 2024, (TN 259209) staff included amendments to Conditions of Certification (COCs) AQ-37 and AQ-99. Also, in the complete text of the revised COCs AQ-49, AQ-50, and AQ-95, there are a line breaks that if addressed, will help with the presentation of these COCs (e.g., "(AQ-SC8)" should be on the same line not below it. Additionally, on page 2 of the cover memo "SDAQMD" should be "SDAPCD". These amendments should have been included in the staff analysis. Staff hereby incorporates these edits into its staff assessment as set forth below.

AQ-37 The discharge of particulate matter from the exhaust stack of each combustion turbine shall not exceed 0.10 grains per dry standard cubic foot (0.23 grams/dscm) corrected to **12% percent** carbon dioxide **by volume**. The District may require periodic testing to verify compliance with this standard. [Rule 53]

Verification: Source tests demonstrating compliance with this condition shall be provided to the CPM and are due within the timeframes specified in Conditions **AQ-57** and **AQ-58**.

AQ-99 This engine shall not operate for non-emergency use during the following periods, as applicable:

- (a) Whenever there is any school sponsored activity, if engine is located on school grounds or
- (b) Between 7:30~~am~~ and 3:30~~pm~~ on days when school is in session, if the engine is located within 500 feet of, but not on, school grounds.

This condition shall not apply to an engine located at or near any school grounds that also serve as the **student's students'** place of residence. [17 CCR ~~§~~93115]

Verification: The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

AQ-49 For each combustion turbine, the number of ~~annual~~ operating hours in each calendar year shall not exceed 2,700. For the purposes of this condition, the number of operating hours shall be calculated as the total number of unit operating minutes divided by 60 rounded to the nearest hundredth of an hour. [Rules 1200, 20.3(d)(2) and 21]

Verification: The project owner shall submit facility annual operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports **(AQ-SC8)**.
~~(AQ-SC8).~~

AQ-50 For each combustion turbine, the number of startup periods occurring in each calendar year shall not exceed 400. ~~When determining compliance with this limit, any startup that occurs during the commissioning period shall not be included.~~ [Rules 1200, 20.3(d)(2) and 21]

Verification: The project owner shall submit facility annual operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports **(AQ-SC8)**.

AQ-95 Engine operation for maintenance and testing purposes shall not exceed 35 hours per calendar year unless otherwise required by the National Fire Protection Association (NFPA) Section 25. [~~Rules 69.4.1, 40 CFR Part 60-Subpart III~~, 17 CCR §93115, Rule 1200, NSR]

Verification: The project owner shall submit to the CPM the fire pump engine operating data demonstrating compliance with this condition as part of the Quarterly Operation Report **(AQ-SC8)**.
~~(AQ-SC8).~~

Page 2 of the Cover memo of Staff Analysis:

Staff recommends new and revised COCs for consistency with the new Title V permit issued by ~~SDAQMD~~ SDAPCD. With the addition of the new and revised COCs, the facility would continue to comply with applicable LORS. The proposed project changes would not result in significant impacts to the ambient air quality.