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Subject: CEC, Geothermal AFCs, follow up from workshop discussion regarding additional information needs, 5th Request
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Attachments: [image001.png](#)

Hi Jerry and Jon,

In the response to Workshop Follow Up Informal Data Request Set 2 (TN 260016 through 260018), the applicant states that due to discussions during the recent public workshops, the applicant will be proposing changes in the BHER geothermal projects' cooling tower orientation/locations and the size of the freshwater ponds. Therefore, the applicant is remodeling the projects' air quality and public health impacts.

Background:

While the applicant is remodeling the air quality and public health impacts, staff believes it would be more efficient for the applicant to simultaneously address additional comments related to modeling. Specifically, two key areas require further analysis:

1. Compliance with the New Annual PM_{2.5} NAAQS of 9.0 µg/m³:
Despite the PSAs indicating that the projects may not need to demonstrate compliance with the new annual PM_{2.5} NAAQS of 9.0 µg/m³, staff has received comments regarding this issue in multiple comment letters. In response, staff plans to include an additional analysis to demonstrate compliance with the new PM_{2.5} NAAQS in the FSAs.
Furthermore, staff intends to use the PM_{2.5} background data at the Sonny Bono station to represent the baseline conditions at the project sites, as this area is less impacted by the vehicle-related emission sources than the urban areas, such as those where the Brawley station and El Centro station are located. Although there are some completeness issues with the data at the Sonny Bono station, staff believes that the available data would still provide valuable inputs to the air quality impacts analysis.
2. Supplemental Modeling with Meteorological Data from the Sonny Bono Station:
Multiple comments on the PSAs and PDOCs raised concerns about the representativeness of the meteorological data from the Imperial County Airport station, suggesting that data from the Sonny Bono station should be used instead. In the applicant's previous response to CURE comments on the ICAPCD PDOCs (TN 256155, TN 256577, and TN 256747), it was noted that only two years of recent data (2020 and 2022) from the Sonny Bono station meet the U.S. EPA requirement of 90 percent minimum completeness before substitution on a quarterly basis. However, staff recognizes that, the U.S. EPA has historically approved modeling using meteorological data from multiple stations to address completeness issues at individual stations. In response to comments regarding the meteorological data, staff plans to include modeling results using the meteorological data from both the Imperial County Airport station (2015 through 2018, 2021) and the Sonny Bono station (2020, 2022).

Information Requests:

1. Please provide a modeling analysis to demonstrate compliance with the new annual PM2.5 NAAQS of 9.0 $\mu\text{g}/\text{m}^3$, using representative PM2.5 background data.
2. Please provide modeling results using the meteorological data from both the Imperial County Airport station (2015 through 2018, 2021) and the Sonny Bono station (2020, 2022).

Please provide responses to these requests within 30 days so the information can be incorporated into the FSA. If you have any questions about these items, let us know. If we need to, we can meet with appropriate technical staff for clarification.

Thank you.

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