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Project Title:	Magnolia Power Project-Compliance
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California Energy Commission Siting, Transmission, and Environmental Protection Division Safety and Reliability Branch Compliance Monitoring and Enforcement Unit 715 P Street, MS-2000,

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Email: joseph.douglas@energy.ca.gov

Attn: Joseph Douglas, Compliance Project Manager

Subject: Data Requests for Magnolia Power Project (01-AFC-06C)

Dear Mr. Douglas:

This transmittal is in response to the Data Requests for the Magnolia Power Project (MPP) dated January 23, 2025. Your letter indicates that the Data Requests are necessary for the staff analysis of the MPP BWP Stormwater Improvement Project Petition to Amend (TN#259131) docketed on 9/12/24.

Data Request AQ-1: Please estimate the PM emissions associated with this proposed project modification.

Response: During operation of the MPP, the only potential change in PM emissions would be from the cooling tower due to the proposed change in the water source. As discussed in the Petition to Amend, the stormwater will be put through a filtration system prior to use in the cooling tower. Filtration is expected to remove a portion of the Total Solids Content (TSC, or total suspended solids plus the total dissolved solids), such that the TSC is expected to be similar to the current water source. In that case, PM emissions changes are not expected as a result of this project.

Data Request AQ-2: Confirm the project would remain in compliance with the 30.25 lbs/day of condition of certification AQ-36.

Response: At this time, BWP is not expecting there to be a change in operational PM emissions that would exceed the PM limit for the cooling tower in AQ-36. Although BWP cannot be absolutely certain that the PM emissions will be within the PM limit until the new system becomes operational. AQ-36 already includes a verification requirement that daily cooling tower PM10 emission estimates be included in the Quarterly Operation Reports. If there is a problem meeting the PM10 emissions limit in AQ-36 once stormwater is used, any issues will be addressed at that time.

Please let me know if the CEC staff require any additional information or have further questions. If so, please contact me at csreyes@burbankca.gov or at (818) 238-3510.

Sincerely,

Claudia Reyes, Senior Environmental Engineer

Burbank Water and Power

Claudia Reyes