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Air Pollution Control Officer

SACRAMENTO METROPOLITAN



AIR QUALITY
MANAGEMENT DISTRICT

RICHARD G. JOHNSON
Assistant Air Pollution Control Officer

DOCKET 93-AFC-2
DATE: NOV 09 1993
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November 9, 1993

Mr. Darrel Woo
Siting Project Manager
California Energy Commission
1516 9th Street, MS-15
Sacramento, CA 95814-5512

RE: Project: Sacramento Cogeneration Authority - Procter and
Gamble Cogeneration Authority

Dear Mr. Woo:

We received a copy of the Application for Certification for a natural gas fired cogeneration plant. Though the application package has been screened and was found to be complete. The District has found a few subject areas listed below, that may necessitate a request for additional data to clarify, correct, or supplement the information the applicant submitted with the application.

- 1) The District has a question regarding the applicability of the standby emergency generator exemption to the proposed internal combustion engine generator. The exemption should only apply if the engine generator is used when there is an actual interruption of power. It is stated that the engine will be used if there is a plant trip. It is unclear if a plant trip, in all cases, will cause a loss of power to the facility. Therefore, the applicant will have to elaborate on what constitutes a plant trip and the status of electrical power to the facility during such an occurrence.
- 2) The BACT determination for the internal combustion engine stated that natural gas would not be appropriate due to its reliability as compared to diesel fuel. The reliability issue appears to be during a natural gas curtailment. However, this would mean that the natural gas fired cogen plant should not be operating either. Therefore, the reliability issue must be further explained. In addition other technologies such as methanol fuel have not been discussed.
- 3) The BACT determination for the auxiliary boiler discounts the use of SCR due to the less than expected service factor of 50 percent. However, the entire analysis is based on a 50 percent service factor. This raises questions as to the classification of this boiler as standby.

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If you have any questions regarding these issues, please call me at 386-6628.

Sincerely,



BRIAN F. KREBS
Air Pollution Control Engineer

cc: Colin Taylor
Sacramento Cogeneration Authority
PO Box 15830
Sacramento, CA 95852-1830