

NORMAN D. COVELL
Air Pollution Control Officer

SACRAMENTO METROPOLITAN



AIR QUALITY
MANAGEMENT DISTRICT

RICHARD G. JOHNSON
Assistant Air Pollution Control Officer

DOCKET 93-AFC-2
DATE: FEB 1 1994
RECD: FEB 4 1994

February 1, 1994

Mr. John Larson
Project Manager
Sacramento Power Authority
PO Box 15830
Sacramento, CA 95852-1830

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

Dear Mr. Larson:

This letter is a follow up to the comments that the District made at the Data Request Workshop on December 15, 1993. The District has reviewed the BACT cost effective analysis for the auxiliary boiler in your December 3, 1993 submittal and has two notable concerns. Firstly, the applicant has done an incremental emission reduction analysis. District policy is to calculate the difference between maximum uncontrolled and maximum controlled emissions. Secondly, the cost figures for the control equipment is considerably higher than the costs submitted for a similar size boiler in the SEPCO project. Therefore, please substantiate the cost figures for the control equipment and then resubmit the analysis without calculating the emission reductions incrementally.

The District has reviewed your BACT analysis for the internal combustion emergency generator. The District was not completely satisfied with the response. We would like the applicant to further research the use of a methanol engine which could achieve 2 gr/bhp-hr as well as the use of an on-road diesel engine certified at 4 gr/hp-hr.

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

Sincerely,

BRIAN F. KREBS
Air Pollution Control Engineer

cc: Proof of Service List (93-AFC-02)

In the Matter of:)	
)	
Application for Certification)	Docket No. 93-AFC-2
of the Sacramento Cogeneration)	
Authority's Procter & Gamble)	PROOF OF SERVICE
Cogeneration Project)	(rev. 12/3/93)
_____)	

PROOF OF SERVICE

I, Joann Barroga, declare that on February 2, 1994, I deposited copies of the attached letter regarding follow comments to the December 15, 1993 Data Request Workshop in the United States mail at Sacramento, CA, with first class postage thereon fully prepaid and addressed to the Participating Agencies listed below.

APPLICANT

Ms. Susan Strachan, Manager
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INTERESTED AGENCIES

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Ed Schnabel
 Sacramento Metropolitan Water District
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CALIFORNIA ENERGY COMMISSION

Docket Office (12 Copies)
 1516 Ninth Street, MS-4
 Sacramento, CA 95814

I am and was at the time of the service of the attached paper over the age of 18 years and not a party to the proceeding involved.

I declare under penalty of perjury that the foregoing is true and correct.

 Joann Barroga