# CALIFORNIA ENERGY COMMISSION

16 NINTH STREET ACRAMENTO, CA 95814-5512 DOCKET 93-AFC-2

DATE: APR 0 7 1994

BECD APR 0 7 1994

April 7, 1994

P&G AFC 93-AFC-2

Ms. Susan Strachan Licensing Project Manager Sacramento Municipal Utility District P.O. Box 15830 Sacramento, CA 95826

Dear Ms. Strachan:

# DELETION OF STANDBY GENERATOR AND REVISION OF AUXILIARY BOILER CAPACITY FACTOR

In your March 9, 1994 and March 18, 1994 letters to the California Energy Commission, the Sacramento Cogeneration Authority (Applicant) revised the proposed Procter and Gamble Cogeneration Project (project) by deleting the diesel standby generator and reducing the auxiliary boiler's capacity factor. These changes affect the air pollutant emissions and impacts modeling for the proposed project. Staff requests that the Applicant revise the project's air pollutant emissions and the project and cumulative air pollutant impacts modeling, and provide the revisions to staff for inclusion in the Final Staff Analysis. Matt Layton, of the Air Quality staff, has previously discussed this request with Stuart Husband of your staff.

Staff believes that the subject changes will have a minor effect on the project's air pollutant emissions. However, deletion of the standby generator will have a significant effect on the project and cumulative NO2 impacts modeling. Further, in discussions with the Sacramento Metropolitan Air Quality Management District (district), staff concluded that the UCD Med Center diesel standby generators should not be included in the source inventory for the project cumulative modeling, which should also help alleviate the large NO2 impacts identified in the cumulative impacts modeling in the Application for Certification (AFC). The reduction of the auxiliary boiler capacity factor will probably not have a marked affect on the project and cumulative modeling. However, it should still be modeled to accurately assess the impacts of the proposed project as modified.

Additionally, from discussions with the district, staff understands that the allowable cooling tower drift eliminator control efficiency will be reduced to 0.0006 percent compared to the 0.002 percent proposed in the AFC. The corrected  $PM_{10}$  emission rate should also be provided to staff and used in the revised modeling.

Ms. Susan Strachan April 7, 1994 Page 2

If you would like to hold a workshop to discuss these matters, let me know at your earliest convenience. If you have any questions, please call me at (916) 654-3930.

Sincerely,

Darrel "H" Woo

Regulatory Project Manager

cc: Service List

#### STATE OF CALIFORNIA

# State Energy Resources Conservation and Development Commission

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

#### PROOF OF SERVICE

I, Gina Morthole', declare that on April 7, 1994, I deposited copies of the attached LETTER TO SUSAN STRACHAN FROM DARREL "H" WOO RE: DELETION OF STANDBY GENERATOR AND REVISION OF AUXILIARY BOILER CAPACITY FACTOR in the United States mail at Sacramento, CA with first class postage thereon fully prepaid and addressed to the following:

# <u>APPLICANT</u>

Ms. Susan Strachan, Manager Projects Permitting & Licensing SMUD P.O. Box 15830 Sacramento, CA 95852-1830

Steve Cohn General Counsel's Office SMUD P. O. Box 15830 Sacramento, CA 95852-1830

# **INTERESTED AGENCIES**

Richard Johnson Division Chief Sacramento Metro AQMD 8411 Jackson Road Sacramento, CA 95826

Ray Menebroker, Chief Project Assessment Branch Stationary Source Division California Air Resources Board P.O. Box 2815 Sacramento, CA 95814

Ed Schnabel Sacramento Metropolitan Water District 5331 Walnut Avenue Sacramento, CA 95841

### **INTERESTED PARTY**

(none listed)

## **CALIFORNIA ENERGY COMMISSION**

(Docket Unit - 12 copies required)

Docket Unit, MS-4 1516 Ninth Street Sacramento, CA 95814

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

(Signature)

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