

DOCKETED

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June 25, 2015

Ms. Mary Dyas
California Energy Commission
Siting, Transmission and Engineering Division
1516 9th Street MS-46
Sacramento, CA 95814-5512

RE: Comments on the Staff Analysis and Amendment Proposal for the Sacramento Cogeneration Authority's Procter and Gamble Cogeneration Project (93-AFC-2C) Auxiliary Boiler 1B Project Petition to Amend

Dear Ms. Dyas:

The Sacramento Cogeneration Authority (SCA) respectfully submits the following comments on the June 3, 2015 Staff Analysis and Amendment Proposal document prepared for SCA's October 2014 petition to the California Energy Commission (CEC) for post-certification license modification for the Procter and Gamble Cogeneration Project (PGCP) (93-AFC-2C) located at 5000 83rd Street, Sacramento, California. The following comments pertain to the Air Quality and Hazardous Materials Management analyses.

Air Quality

SCA has the following comments regarding typographical and regulatory consistency corrections to the Air Quality Analysis section of the Staff Analysis:

- a. The Sacramento Metropolitan Air Quality Management District (SMAQMD) BACT trigger level is incorrectly listed as "10 lb/day" in the next to last paragraph on page 12 of the Staff Analysis, but correctly listed as "0 lb/day" for all pollutants except CO in Table 6 on page 20.
- b. Ozone is listed as "unclassifiable/attainment" for the federal standard in Table 1 on page 15, but the Sacramento Valley Air Basin is "severe" nonattainment for the federal ozone standard per the following table on the SMAQMD website:
<http://www.airquality.org/aqdata/attainmentstat.shtml>.
- c. The statement at the beginning of the second paragraph on page 23 that greenhouse gas (GHG) emissions for the Boiler 1B project "would have been subject to PSD review under Step 2 applicability" but for the Supreme Court decision on June 23, 2014 is not accurate because maximum project GHG emissions are only 55,751 metric tons (MT) per year as listed in Table 3.1-2 of SCA's October 2014 petition; whereas, the "Step 2" modification trigger level is 75,000 MT per year.

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- d. AQ-AB18 on page 77 has a typo in the Verification section that reads, "At least sixty (30) days before . . ." It should be "At least thirty (30) days before . . ."
- e. AQ-AB23 on page 80 requires that "[p]rior to *construction*, the permittee shall surrender sufficient ERCS to the SMAQMD . . ." (emphasis added); whereas, SMAQMD Rule 202, Section 408 requires that ERCs be surrendered prior to operation; therefore, we request that AQ-AB23 be revised to be consistent with the Rule 202 requirement (we have also requested that the SMAQMD change this provision in their draft permit).
- f. The AQ-AB23 "Verification" section requires "recertification" of ERCs by the Feather River Air Quality Management District (FRAQMD) at least 30 days prior to the start of construction, but recertification as defined in FRAQMD Rule 10.9 will not occur for at least 6 months; therefore, we request that this verification language be revised as follows:

Verification: *At least thirty (30) days prior to the start of ~~construction~~ operation, the facility owner shall provide to the CPM a copy of the ~~signed recertification documentation from the Feather River Air Quality Management District demonstrating approval of the ERC transfer and documentation from the Sacramento Metropolitan Air Quality Management District demonstrating approval of the use of banking certificate (Certificate FRAQMD #99001-T2) has been validated and surrendered for the Auxiliary Boiler 1B Project.~~*

Hazardous Materials Management

On page 120 of the Staff Analysis, the Verification section of the proposed condition "HAZ-8" requires SMUD to submit a "Fuel Gas Pipe Cleaning Work Plan" to the CPM for review and approval, and to the CBO for information. We note that since SMUD acted as its own CBO during the plant construction, SMUD will also serve as the CBO for the purposes of this condition.

We believe these corrections and clarifications are non-substantive changes to the Staff Analysis and therefore require no further public review. Please contact SMUD Environmental Specialist Rene Toledo at (916) 732-7452, if you have any questions concerning this letter or project.

Once you have reviewed this comment letter, please e-file it for this project.

Please call me if you have any questions.

Sincerely,
CH2M HILL

John L. Carrier, J.D.
Program Manager

cc: SMUD Project File
Aleta Kennard, SMAQMD
Rene Toledo, SMUD
Jeff Adkins, Sierra Research