

**DOCKETED**

<b>Docket Number:</b>	17-SPPE-01
<b>Project Title:</b>	McLaren Backup Generating Facility
<b>TN #:</b>	224895
<b>Document Title:</b>	VDC's Supplemental Air Quality Testimony
<b>Description:</b>	VDC's Supplemental Testimony of Dr. Shari Beth Libicki in Response to Committee Order Air Quality Question 1
<b>Filer:</b>	Scott Galati
<b>Organization:</b>	DayZenLLC
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STATE OF CALIFORNIA

Energy Resources  
Conservation and Development Commission

In the Matter of:

Application For Small Power Plant  
Exemption for the  
**McLAREN BACKUP GENERATING  
FACILITY**

**DOCKET NO. 17-SPPE-01**

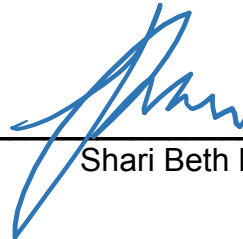
**DECLARATION OF SHARI BETH  
LIBICKI**

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I, Shari Beth Libicki, declare as follows:

1. I am presently employed as Ramboll's Global Air Quality Service Line.
2. A copy of my professional qualifications and experience was included with the previously filed Opening Testimony and is incorporated by reference in this Declaration.
3. I prepared the attached Supplemental Testimony relating to Air Quality and in Response to the Committee Order for the Application for Small Power Plant Exemption for the McLaren Backup Generating Facility (California Energy Commission Docket Number 17-SPPE-01).
4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.
5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed at San Francisco on October 5, 2018.



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Shari Beth Libicki

**VANTAGE DATA CENTERS  
McLAREN BACKUP GENERATING FACILITY  
AIR QUALITY  
SUPPLEMENTAL TESTIMONY TO RESPOND TO COMMITTEE ORDER**

I. Name: Shari Beth Lbicki

II. Purpose:

My Supplemental Testimony addresses the specific question related to Air Quality contained in the Notice of Status Conference and Further Orders (Committee Order) docketed on September 28, 2018 in the McLaren Backup Generating Facility (MBGF) (CEC Docket 17-SPPE-1) proceeding.

III. Qualifications:

My qualifications are outlined in previously filed Exhibit 27.

To the best of my knowledge all referenced documents and all of the facts contained in this testimony are true and correct. To the extent this testimony contains opinions, such opinions are my own. I make these statements and provide these opinions freely and under oath for the purpose of constituting sworn testimony in this proceeding.

IV. Opinion and Conclusions

The Committee requested a response related to air quality. The background and question are reproduced directly from the Committee Order below.

*Air Quality*

The parties' comments filed in the record and made at the August 30 Hearing focused on whether the potential impacts to air quality when the generators are used for emergency operation had been modeled.

The evidence to date indicates that the potential impacts of the generators based on 50 hours per year per generator have been modeled.<sup>14</sup> This same evidence establishes the actual testing time per year per generator. Given that the single instance of outage in the vicinity of the Data Center was 19 hours, it seems reasonable that the 50 hours of

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<sup>14</sup> TN 223911, p. 5.3-14-5.3-17.

modeling would adequately address the potential air quality impacts for both the number of actual testing hours and the hours of emergency operation.

Thus, while separate modeling for emergency operations distinct from that already done for the maximum hours per year of testing authorized under the applicable permit from the air pollution control district does not appear necessary, the modeling discloses that, when operated for 50 hours per year per generator, the Project would exceed the air district's threshold of significance for nitrous oxide (NOx).<sup>15</sup>

The Committee therefore **ORDERS** that Staff and Applicant shall, and other parties may, file an Issues Statement no later than Friday, October 5, 2018, to address the following:

1. What measures, if any, are available to mitigate the Project's potential to exceed the threshold of significance for daily and annual NOx emissions to a less than significant level?

**Response:** In asking this question, the Commission cited to the Initial Study/Mitigated Negative Declaration prepared by Staff and entered into evidence as Exhibit 200 (TN 223911), p. 5.3-14 through 5.3-17. That portion of the document discusses the annual and daily average NOx emissions from testing and maintenance, and notes that, at 40 tons per year, the emissions are in excess of the BAAQMD CEQA mass emissions threshold. It also states at page 5.3-16 that per BAAQMD's Rule 2-2, new sources that emit more than 10 tons per year (tpy) of NOx must fully offset emissions". By fully offsetting MDC's annual emissions from maintenance and testing, there are no incremental emissions on a regional basis. Therefore, the annual and daily average emissions are offset to zero, and there are no increases in mass emissions from maintenance and testing as a result of this Project. Exhibit 200 also states that "[i]n order for the project to qualify for offsets provided by the BAAQMD's small facility bank, the project's total PTE would need to be below 35 tpy. The MDC would need to take a limit on the total annual hours per engine per year in order to remain below BAAQMD Rule 2-2-302 of 35 tpy." I agree with these statements. The Draft Authority to Construct provided by the BAAQMD does, indeed contain a limit on emissions from testing and maintenance from MDC of 35 tpy NOx. Therefore, MDC qualifies for the BAAQMD small facility offset bank which will provide offsets to reduce the annual and average daily emissions to zero.

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<sup>15</sup> TN 223911, p. 5.3-14-5.3-17.

In addition to the typical testing and maintenance of engines, if the MDC did experience a 19-hour emergency like the only instance identified by Silicon Valley Power in the last 8 years, and if all of the engines were operated, the NOx emissions from such an event would remain below the 35 tpy threshold for annual emissions of NOx.

The significance thresholds in the BAAQMD CEQA guidelines for mass emissions of NOx are 10 tons per year, and 54 pounds on an average daily basis. As noted above, due to the offsets required by BAAQMD Rule 2-2, the emissions will be offset to zero on both an annual basis and an average daily basis.

Therefore, emissions of NOx are not significant with respect to the BAAQMD CEQA guidelines and will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.