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CARB-BAAQMD Joint Recommendation

Additional submitted attachment is included below.

Joint Recommendation for the Sequoia Backup Generating Facility Small Power Plant Exemption Proceeding from the Bay Area Air Quality Management District (BAAQMD) and the California Air Resources Board (CARB)

On November 16, 2020, at a regularly scheduled business meeting, the California Energy Commission (CEC) remanded this proceeding back to the Committee overseeing the proceeding to conduct limited additional proceedings to consider comments made by BAAQMD and CARB concerning input assumptions regarding NO₂ impacts from routine testing and maintenance, and direct and cumulative impacts of emergency operations of the project's backup generators. On December 4, 2020, the Committee issued a Notice of Committee Conference in which it directed the parties to meet and confer and invite CARB and BAAQMD. The Notice also invited CARB and BAAQMD to submit any further relevant information with respect to these issues.

As supported by information provided by CARB with its comments on October 15, 2020, it appears that Tier 4 engines have been used for similar projects and are feasible for the proposed project. When all components are operating, Tier 4 engines are cleaner than the Tier 2 engines proposed, and Tier 4 engines would further reduce this project's potential emissions, most critically during those rare occasions the project may have to run more than one engine at a time. CARB and BAAQMD agree the use of Tier 4 engines is adequate in this case and, given the circumstances, further modeling of emissions may not be necessary if the project applicant agreed to this project change. Therefore, to enable expeditious consideration and resolution of the remaining issues for the Sequoia project, we strongly encourage the project applicant to modify the project to include this technology and the Committee to revise its decision to reflect that change.