

**DOCKETED**

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<b>Project Title:</b>	Sequoia Data Center
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State of California  
State Energy Resources Conservation and Development Commission

In the matter of:

Sequoia Data Center

Docket 19-SPPE-03

Intervenor Sarvey's Evidentiary Hearing Questions

Pursuant to the Committee's April 12, 2021 "Notice of Prehearing Conference, Evidentiary Hearing, Scheduling Order, and Further Orders" Intervenor Sarvey hereby submits question for the evidentiary hearing as directed by the committee.

- 1) A lead agency is required to re-circulate a MND when the document must be substantially revised after public notice of its availability has previously been given, but prior to its adoption. A "substantial revision" of the MND means a new, avoidable significant effect is identified and mitigation measure[s] or project revision[s] must be added in order to reduce the effect to insignificance. CARB and BAAQMD have identified NOx emissions from emergency operation as a probable significant effect and BAAQMD has prescribed SCR to mitigate that impact on all engines of that size in the district. The original 321 page IS/MND was filed on January 1, 2020 by staff at the State Clearinghouse so other agencies could comment. Now on March 23, 2021, 14 months later CEC Staff has filed a 401 page revised compiled IS/MND that contains substantial revisions to the original project to mitigate potential NO2 violations. When will staff refile the latest IS/MND with the State Clearinghouse and if not why not?
- 2) On Page 5.3-31 of the latest version of the Initial Study it states, "**The staff's cumulative HRA includes four major types of sources: (1) San Jose International Airport emissions sources located within 2,000 feet of the boundaries proposed for the Walsh (19-SPPE- 02) and Sequoia (19-SPPE-03) projects combined; (2) existing stationary sources; (3) surrounding highways, major streets, and railways; and (4) the proposed Sequoia project, the proposed Walsh project, and the approved McLaren project**

**(17-SPPE-01)**. There is currently 25 existing data centers in Census Tract 6085505202 which of these data centers was included in staff's updated analysis.

- 3) Did staff include the Lafayette Data Center and the Santa Clara Data Center in its cumulative impact analysis.
- 4) In the cumulative impact analysis did staff consider impacts to the employees at any of the businesses within 1,000 feet of the project fenceline?
- 5) Staff normally uses a 6-mile radius when considering cumulative impacts for a project application. The maximum cumulative impacts are reported to be at the Off the Wall soccer facility which is located approximately 2,300 feet away from the SDC. How is a 1,000-foot radius representative of the cumulative impacts from this project?

According to the Revised Initial Study and Proposed Mitigated Negative Declaration on Page 4-10, "The SCR system would use urea which will be stored in one 1,500-gallon tank for each pair of generators." That would lead to a potential of  $1,500 \times 27 = 40,500$  gallons of urea stored on site. The IS/MND further states that, "The projects ammonia emission would be 0.21 lb/hr and 0.278 tons/yr (557 lbs/yr) as estimated by the applicant (Sequoia 2021b).<sup>1</sup>

- 6) What are the GHG emissions from the urea transportation, production, storage, and usage?
- 7) Urea has a storage expectancy of 2 years. If the project only uses 557 lbs a year and stores 40,500 gallons of urea. How much excess urea will be disposed of?
- 8) In the Great Oaks South proceeding the applicant has filed a new noise assessment for the application of SCR to the backup diesel generators. (Exhibit 317) The noise assessment states on page 1, "Noise data provided for generators equipped with the Tier 4 treatment indicates an increase in sound power level of about 5 dBA and a substantial shift in sound energy from higher to lower frequencies. Additionally, Tier 4 treatment would increase the height of the exhaust stack, the location where most noise originates. No other aspects of the project are anticipated to be affected." What is the expected increase in sound from application of the SCR? If there is no expected sound increase why would this project not have an increase in sound with application of SCR like the GOSBGS?

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<sup>1</sup> TN 236919 Revised Initial Study and Proposed Mitigated Negative Declaration Page 5.3-28

- 9) According to the updated sound analysis performed for application of SCR at the Great Oaks South Data Center, “This change in the frequency spectrum of generator noise would affect how the noise propagates throughout the site vicinity as lower frequency sound propagates further by diffracting around structures and through receiving less attenuation provided by absorption in the air.” Where is staff’s revised noise analysis to reflect the change in frequency spectrum of the generator noise from the application of SCR.
- 10) What is the increase in stack height with the application of SCR for the project? If there is no increase in stack height why is this project different than the Great Oaks South project?
- 11) How will the stack exit velocity change with the application of SCR?
- 12) What is the expected energy penalty from the application of SCR?
- 13) What is the expected energy penalty from the conversion of urea for use in the SCR?
- 14) The California Public Utilities Commission just approved the use of backup diesel generators in demand response programs for the upcoming several years in Decision D.21-03-056. The decision provides payment of \$1,000 per MWh for energy from backup diesel generators. Does the applicant intend to participate in this program? Applicant has proposed condition PD-3 as follows:

*Condition of Exemption PD 3*

*The granting of the Small Power Plant Exemption for the Sequoia Backup Generating Facility is specifically conditioned on the provision that at no time shall the Project owner of the Sequoia Data Center participate in a load shedding and/or demand response program that would allow it to voluntarily use electricity generated by the Sequoia Backup Generating Facility in order to participate in any load shedding and/or demand response request from the CEC, any utility, or any State agency.*

- 15) Does the applicant still propose PD-3?
- 16) Considering the CPUC’s latest decision does Staff support PD-3 to prevent the SDC from participating in any demand response program?

17) What increase in nitrogen deposition did staff determine will be experienced from the use of urea in the SCR. Did staff model that increase?

18) What is the expected ammonia slip from the project?

19) The revised compiled IS/MND states on page 5.3-30 that Ammonia would be emitted from the urea used in the SCR system (Sequoia 2021a), increasing the health risk. Has staff included the ammonia emissions in its health risk assessments?