

DOCKETED

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February 28, 2020

California Energy Commission
Attn: Mary Dyas
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814-5512

Re: Campbell Cogeneration Project (93-AFC-03C) Comments on Staff Analysis of Petition to Amend the Final Commission Decision

Dear Ms. Dyas:

The Sacramento Municipal Utility District Financing Authority (SFA) appreciates Staff's review of SFA's Petition to Amend. We offer the following minor comments on the Staff Analysis issued on February 4, 2022.

In general, SFA requests that references to the Campbell Power Plant previous owner Sacramento Power Authority (SPA) be updated to SFA.

Page 21, Air Quality Table 5. Maximum Emission Increases from the Modified Cooling Tower, heading of the last column – This column is titled "Annual (lb)" and should be labeled "Annual (tons)".

Page 27, Condition of Certification AQ-8, table labeled "Maximum Allowable Emissions Combined Emissions from: Gas Turbine, Duct Burner and Cooling Tower carbon monoxide emissions. The carbon monoxide emissions shown in this table should be the same as the previous table shown in COC AQ-8 as the cooling tower does not emit carbon monoxide.

Page 29, Condition of Certification AQ-CT4 – The language of the 1st paragraph of Condition AQ-CT4 was previously revised. SFA suggests the following revisions to Condition AQ-CT4 to conform with the air permit Condition 13.

AQ-CT4 Testing for VOC/~~ROC~~ and Hexavalent Chrome (measured as compounds of chrome) of the ~~reclaimed/~~recycled water inlet to the cooling tower (not the cooling tower basin) must be performed within 60 days of the initial startup of the modified recycled water (~~or if revising the VOC emission limits testing must occur before startup with reclaimed/recycled water~~) and once every second calendar year thereafter to verify compliance with Condition AQ-CT2 and AQ-SC1.

Page 30, Condition of Certification AQ-CT6, Verification – SFA suggests the following revisions to the Verification.

Verification: The facility owner must maintain records of all “Hot Spots” and Criterial Pollutant and Toxic Emissions Reporting documents and provide copies to the CPM upon request ~~notify the SMAQMD and the CPM within fifteen working days of before the execution of this condition.~~

Page 31, Condition of Certification AQ-CT7 – SFA requests Staff include the provisions in the Draft Authority to Construct Condition 17 into Condition of Certification AQ-CT7, as shown below.

If further source testing of the cooling tower recycled water shows a lower VOC concentration in the recycled water, then the amount of VOC credits submitted may be adjusted downward provided the VOC emission limitations in Conditions AQ-7, AQ-8, and AQ-CT2 are correspondingly adjusted to reflect the revised lower recycled water VOC concentration. Any adjustment of the VOC emission limits and corresponding reduction of VOC credits must occur prior to startup of the cooling tower with recycled water under this Authority to Construct. Source testing must include sampling of the recycled water prior to entering the cooling tower basin.

If you have any questions on any of these compliance demonstrations, please do not hesitate to call.

Sincerely,

Ryder Couch
Manager, Thermal Generation Assets