

**CALIFORNIA ENERGY COMMISSION**  
**REPORT OF CONVERSATION Page 1 of 1**

**DOCKET**  
 06-AFC-9  
**DATE** JAN 30 2008  
 JAN 30 2008  
**FILED** COLUSA 06-AFC-9



**Systems Assessment and  
 Facilities Siting Division**

**PROJECT TITLE: Colusa Generating Station**

<input checked="" type="checkbox"/> Telephone	CEC	<input type="checkbox"/> Meeting Location:	
<b>NAME:</b>	Jack Caswell	<b>DATE:</b>	1/30/08
<b>WITH:</b>	Raoul Renaud, Energy Commission Hearing Officer		
<b>SUBJECT:</b>	Need for Air Quality Staff Testimony Clarification		

**COMMENTS:**

In a conversation with the Energy Commission's Hearing Officer, the attached request was made for clarification on the Air Quality staff's testimony in the Final Staff Assessment document for the Colusa Generating Station. This request and response for information has been docketed as part of the evidentiary record.

**Hearing Office Request:**

Jack--I have come across an issue in the AQ section that I need to clarify with staff (through you). Please explain the status of the boiler technology and what levels will be required of that technology. Will it be an "Ultra Low NOx Burner" Did Staff have any information from the applicant regarding their final boiler control technology selection to meet the 15 ppm BACT level identified in the Districts condition to meet 15 ppm?

**Response to Hearing Office:**

Jack,

The BACT finding is memorialized in the District condition as an emission limit (15 ppm), no specific type of control technology is required to meet that limit. However, the FDOC does assume that the technology will be an "Ultra Low NOx Burner" on page 8 and later notes a "Low NOx Burner" on page 28. Staff did not have any information from the applicant regarding their final boiler control technology selection to meet the 15 ppm BACT level, as the applicant's original low NOx burner BACT proposal was quite a bit higher than the final required emission concentration, and the final BACT determination from the District occurred well after the data requests/response phase of the project. Staff has researched low NOx burner technology and has found that low NOx burners are quite capable of meeting this emission limit, but the exact type and manner of burner is not known and there is also a very small potential for flue gas recirculation (FGR) to be added to the boiler design. This is why staff did not commit to the exact control technology design in the FSA.

The boiler will be source tested for verification demonstration of the BACT limit (AQ-8) and Condition AQ-24 requires the following in the verification of that condition..."The project owner shall submit to the CPM and APCO for approval the auxiliary boiler selected manufacturer emissions data and specifications demonstrating compliance with this condition and condition **AQ-17** at least 30 days prior to installation"...so staff did not require vendor specifications or guarantees be provided as part of the verification of Condition AQ-17.

I am in the process of contacting Les Fife to see if he received any final boiler control design commitments from the applicant during the DOC process, and I'll forward his response when received.

I hope this clears things up. If a more specific technology description is desired for the PMPD, the FDOC might be used as a reference for "ultra low NOx burner", but as inferred above at this time I don't know if this is an assumption in the DOC or a true commitment from the applicant. Will

<b>cc:</b> Dick Ratliff Raoul Renaud Dockets	<b>Signed:</b>
	<b>Name:</b> Jack W. Caswell

**From:** <WWalters@aspeneg.com>  
**To:** "Jack Caswell" <Jcaswell@energy.state.ca.us>  
**CC:** "Keith Golden" <Kgolden@energy.state.ca.us>  
**Date:** 1/30/2008 12:55 PM  
**Subject:** Colusa Auxiliary Boiler Control Technology

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