



DOCKET

08-AFC-6

DATE JAN 16 2009

RECD. JAN 16 2009

January 16, 2009

Dockets Unit
California Energy Commission
1516 Ninth Street, MS 4
Sacramento, CA 95814

RE: Willow Pass Generating Station
Application for Certification 08-AFC-6

On behalf of Mirant Willow Pass, LLC, the applicant for the above-referenced Willow Pass Generating Station AFC, we are pleased to submit the following:

- Revised Response to CEC Data Request (#55) (one hard copy to Dockets Unit; electronic mail to Proof of Service)
- A CD containing Revised Air Quality Modeling Files (five copies to Dockets Unit)

URS Corporation

Kathy Rushmore
Project Manager

Enclosures

CC: Ivor Benci-Woodward



January 16, 2009

Ivor Benci-Woodward
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Subject: **Application for Certification (08-AFC-6)**
 Revised Air Modeling Results to Address BAAQMD Comments

Dear Mr. Benci-Woodward:

The purpose of this submittal is to present revised Willow Pass Generating Station (WPGS) air quality modeling results for the maximum hourly startup emission cases. These results reflect Bay Area Air Quality Management District (BAAQMD) recommendations regarding the meteorological input data used in the modeling in support of the response to CEC Data Request 55, which was submitted to the California Energy Commission (CEC) on January 5, 2009. Specifically, BAAQMD advised the applicant that meteorological data should be processed in the AERMET program differently from the methods reflected in the modeling that was submitted. Accordingly, the Stage 3 input file was reprocessed in AERMET to include a time adjustment factor for the Oakland upper air data, rather than the onsite surface data to ensure that AERMET correctly calculates the convective boundary layer.

As stated in the response to Data Request 53, maximum hourly emissions reflect two startups and one shutdown, with the remaining part of the hour at full load emissions. Emissions from the proposed gas turbines for this startup/shutdown scenario are unchanged from the levels presented in the response to Data Request 53. Table 55-1, however, has been revised to present the revised modeling results and is presented below. This revised table replaces the corresponding table previously provided in the January 5, 2009 submittal, *Responses to CEC Data Requests (#49-57)*. All revised startup/shutdown modeling and meteorological processing files are included in a CD accompanying this letter.

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**Table 55-1 (Revised)
AERMOD Modeling Results for Pollutants
with Revised Maximum Hourly Emission Rates¹
(All Project Sources Combined)**

Pollutant	Averaging Period	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	Background Concentration ($\mu\text{g}/\text{m}^3$)²	Total Concentration ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	CAAQS ($\mu\text{g}/\text{m}^3$)	Maximum UTMX NAD27 (m)	Maximum UTMY NAD27 (m)
NO ₂	1 hour ³	168.6	109.04	277.6	NA	339	594,750	4,205,950
CO	1 hour	1,788	3,762	5,550	40,000	23,000	594,800	4,205,925

AERMOD = American Meteorological Society and Environmental Protection Agency preferred atmospheric dispersion model

CAAQS = California ambient air quality standard

CO = carbon monoxide

m = meters

$\mu\text{g}/\text{m}^3$ = micrograms per cubic meter

NAAQS = national ambient air quality standard

NO₂ = nitrogen dioxide

UTMX = Universal Transverse Mercator east-west

UTMY = Universal Transverse Mercator north-south

NAD27 = North American Datum of 1927

Notes:

¹ Pollutants having AAQs of 1 hour whose maximum hourly emissions rate increased.

² Background represents the maximum values measured at the monitoring stations

³ Results for NO₂ during operations used ozone limiting method with ambient ozone data collected at the Pittsburg monitoring station for the years 2002 through 2005

Please contact me at (415) 243-3833 if you have any questions or require additional information.

Sincerely,



Kathy Rushmore
Project Manager
URS Corporation

Enclosure

cc (w/o accompanying CD): Weyman Lee, BAAQMD
Ted Hull, BAAQMD
Docket 08-AFC-6 Proof of Service List



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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APPLICATION FOR CERTIFICATION
FOR THE *WILLOW PASS*
GENERATING STATION

Docket No. 08-AFC-6
PROOF OF SERVICE
(Submitted January 16, 2009)

Transmission via electronic mail and by depositing one original signed document with FedEx overnight mail delivery service at San Francisco, California with delivery fees thereon fully prepaid and addressed to the following:

DOCKET UNIT

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-6
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512
docket@energy.state.ca.us

Transmission via electronic mail addressed to the following:

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DECLARATION OF SERVICE

I, Kathy Rushmore, declare that on January 16, 2009, I deposited copies of the attached *Revised Response to Data Request 55* in the United States mail at San Francisco, California with first-class postage thereon fully prepaid and addressed to the California Energy Commission.

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 16, 2009 at San Francisco, California.



Kathy Rushmore