

From: Gerry Bemis
To: Felicia Miller
Date: 4/2/2012 12:29 PM
Subject: Re: Watson: Potential PMPD Discrepancy with FDOC

Yes, it appears that this inconsistency was missed during several levels of review. Staff agrees that the information should be recorded weekly, not monthly.

-- Gerry

Gerald R. Bemis
Air Resources Supervisor I
Air Quality/Public Health/T-line
Safety & Nuisance Unit
California Energy Commission
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(916) 654-4960

DOCKET	
09-AFC-1	
DATE	<u>APR 02 2012</u>
RECD.	<u>APR 02 2012</u>

>>> Felicia Miller 4/2/2012 12:14 PM >>>
Gerry,

Please review the applicant's comments and address your response back to me.

Thanks, Felicia

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CALIFORNIA ENERGY COMMISSION
Siting, Transmission & Environmental Protection (STEP) Division

1516 Ninth Street, Sacramento, CA 95814 www.energy.ca.gov  **Think before you print.**

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>>> "Fischer, Cindy" <cindy.fischer@urs.com> 4/2/2012 12:09 PM >>>
Felicia,

We have noticed a minor discrepancy in the March 21, 2012 *Supplemental Staff Filing Regarding Additional Staff-Proposed Errata* on the Presiding Members Proposed Decision (PMPD) for the Watson Cogeneration Steam and Electric Reliability Project (09-AFC-1).

in the Staff's Condition of Certification AQ-14, the referenced frequency is "monthly". However, the Air District's corresponding permit Conditions D12.X3 and D12.X5 show a required frequency of "weekly." I have attached the portion of the CEC Staff's supplemental filing on the PMPD comments and the portion of the Air District's Final Determination of Compliance (FDOC) to illustrate the minor conflict in terms.

Please let me know if you have any questions or if you need any additional information. I did not see any mention of this apparent discrepancy in the Air District's comments on the PMPD.

Thank you for your assistance,

Cindy Fischer, P.E.
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PROOF OF SERVICE (REVISED 3/27/12) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 4/2/12
DLS

Verification: The project owner shall submit to the CPM no less than 30 days after installation, a written statement by a California registered Professional Engineer stating that said engineer has reviewed the as-built-designs or inspected the identified equipment and certifies that the appropriate device has been installed and is functioning properly. The project owner shall submit annual calibration results within 30 days of their successful completion.

AQ-13 The operator shall install and maintain a temperature gauge and recorder to accurately indicate and record the temperature in the exhaust at the inlet of the SCR reactor. The gauge shall be accurate to within plus or minus five percent and shall be calibrated once every 12 months. The catalyst temperature range shall remain between 740 degree F and 840 degree F while the SCR reactor is being used to reduce NO_x emissions. Ammonia injection is not required if the inlet SCR temperature falls below 500 F, not to exceed 3 hours during startup.

Continuously recording is defined for this condition as at least once every hour and is based on the average of the continuous monitoring for that hour.

Verification: The project owner shall submit to the CPM no less than 30 days after installation, a written statement by a California registered Professional Engineer stating that said engineer has reviewed the as-built-designs or inspected the identified equipment and certifies that the appropriate device has been installed and is functioning properly. The project owner shall submit annual calibration results within 30 days of their successful completion.

AQ-14 The operator shall install and maintain a pressure gauge and recorder to accurately indicate and record the pressure differential across the SCR catalyst bed in inches of water column. The gauge shall be accurate to within plus or minus five percent and shall be calibrated once every 12 months. The operator shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the CO catalyst reactor in inches water column.

Continuously recording is defined for this condition as at least once every month and is based on the average of the continuous monitoring for that month.

Verification: The project owner shall submit to the CPM no less than 30 days after installation, a written statement by a California registered Professional Engineer stating that said engineer has reviewed the as-built-designs or inspected the identified equipment and certifies that the appropriate device has been installed and is functioning properly. The project owner shall submit annual calibration results within 30 days of their successful completion.

AQ-15 The project equipment shall not be operated unless the project owner demonstrates to the SCAQMD Executive Officer that the facility holds

<p align="center">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p align="center"><i>ENGINEERING DIVISION</i></p> <p align="center">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 90	PAGE 62
	APPL. NO. See Below	DATE 3/4/11
	PROCESSED BY Rafik Beshai	CHECKED BY Tran Vo

[Devices subject to this condition: CX1]

D12.X3 The operator shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the SCR catalyst bed in inches water column.

The operator shall also install and maintain a device to continuously record the parameter being measured.

For the purpose of this condition, continuously record shall be defined as recording at least once every week and shall be calculated based upon the average of the continuous monitoring for the week.

The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: CX1]

D12.X4 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the total hourly throughput of injected ammonia (NH₃).

The operator shall also install and maintain a device to continuously record the parameter being measured and to continuously record the ammonia to emitted NO_x mole ratio.

For the purpose of this condition, continuously record shall be defined as recording at least once every hour and shall be calculated based upon the average of the continuous monitoring for that hour.

The measuring device or gauge shall be accurate to within + or – 5.0 percent. It shall be calibrated once every 12 months.

[RULE 2012, 5-6-2005]

[Devices subject to this condition: CX1]

D12.X5 The operator shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the CO catalyst reactor in inches water column.

The operator shall also install and maintain a device to continuously record the parameter being measured.

<p align="center">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p align="center"><i>ENGINEERING DIVISION</i></p> <p align="center">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 90	PAGE 63
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For the purpose of this condition, continuously record shall be defined as recording at least once every week and shall be calculated based upon the average of the continuous monitoring for the week.

The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: CX2]

D28.1 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted at least annually.

The test shall be conducted to determine the NOX emissions at the outlet.

The test shall be conducted to determine the SOX emissions at the outlet.

The test shall be conducted to determine the flow rate at the outlet.

The test shall be conducted to determine the CO emissions at the outlet.

The test shall be conducted to determine the total hydrocarbon emissions at the outlet.

The test shall be conducted to determine the ~~total PM~~ PM10 emissions at the outlet.

The test shall be conducted to determine the NH3 emissions at the outlet.

The test shall be conducted to determine the formaldehyde emissions at the outlet.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**APPLICATION FOR CERTIFICATION
FOR THE *WATSON COGENERATION STEAM
AND ELECTRIC RELIABILITY PROJECT***

DOCKET NO. 09-AFC-01
PROOF OF SERVICE LIST
(Revised 3/27/12)

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DECLARATION OF SERVICE

I, Diane Scott declare that on April 2, 2012, I served and filed a copy of the attached **Watson: Potential PMPD Discrepancy with FDOC dated April 2, 2012**. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: www.energy.ca.gov/sitingcases/watson/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- X Served electronically to all e-mail addresses on the Proof of Service list;
- X Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- X by sending one electronic copy to the e-mail address below (preferred method); **OR**
- by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT

Attn: Docket No. 09-AFC-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Original Signed By:

Diane Scott
Siting, Transmission and Environmental Protection Division