



## Quail Brush Genco, LLC

A Project Company of Cogentrix Energy, LLC

9405 Arrowpoint Boulevard  
Charlotte, North Carolina 28273-8110  
(704) 525-3800  
(704) 525-9934 – Fax

October 1, 2012

Siting Committee  
Raoul Renaud, Hearing Officer  
Eric Solorio, Project Manager  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814



**Re: Quail Brush Generation Project (11-AFC-03)  
Initial Response to Dorian Houser's Intervenor Data Requests, 28 through 35**

Dear Members of the Siting Committee and Mr. Solorio:

Pursuant to Section 1716(f) of the CEC's regulations, Quail Brush Generation Project (the Applicant) is providing the below initial response to Dorian Houser's (Intervenor) Data Requests, 28 through 35, dated September 11, 2012. The Applicant will respond to Data Requests 28, 29, and 30 on October 11, 2012. For the reasons explained below, the Applicant objects to Data Requests 31, 32, 33, 34, and 35. Each of these Data Requests is detailed below, along with the Applicant's objections thereto.

**Generic Objection to Data Requests 31-35:**

The Applicant objects to these requests as they are unwarranted and have been previously answered. Detailed supporting discussions and responses to these requests have been provided previously. See the following:

1. Quail Brush Genco AFC, 11-AFC-3, Section 4.7, Subsection 4.7.5, August 2011.
2. Revised AFC Section 4.7.5, as docketed with the CEC on 9-24-12.
3. Quail Brush Genco AFC, 11-AFC-3, Appendix F.2, and Appendix F.3, August 2011.
4. Revised AFC Appendix F.2, as docketed with the CEC on 9-24-12.

5. Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-3, Response to Dorian Houser's Intervenor Data Requests, 1 through 27, dated 6-5-12.
6. Memo to Eric Solario, et.al., CEC, from Aerowest, dated 4-2-12 (Revised background AQ data), docketed with the CEC on 4-3-12 as an attachment to the "Minor Changes to the Quail Brush Power Project Air Quality Emissions and Impact Analysis."
7. 40 CFR 60, Part 51, Appendix W, 11-9-05.
8. Ambient Air Quality Network Plan-2011, San Diego APCD-MTSD, June 2012, *available at* [http://www.sdapcd.org/air/reports/2011\\_network\\_plan.pdf](http://www.sdapcd.org/air/reports/2011_network_plan.pdf).

**Data Request 31:** *Please indicate where in the AFC or its supplements that the air quality information for the Santee local region is provided. If not yet given, please provide this information.*

**Response to Data Request 31:** Consistent with the General Objection above, the Applicant objects to this data request because it is unwarranted and has been previously addressed by the Applicant.

Background air quality data used in the project impact analysis was established in accordance with the presently acceptable methods utilizing the individual pollutant averaging times, data derived from approved sources (EPA, CARB, and SDAPCD), basis of the standard for each pollutant averaging time, etc. The most recent 3 years of data was used, i.e., 2009 through 2011 for multiple monitoring sites around the project region. Data from the Overland Ave monitoring site, which is the closest monitoring location to the site, was used as the basis for background values unless data for a specific pollutant was not available from this site. The data is presented and discussed in the AFC, 11-AFC-3, Appendix F.2, and Appendix F.3, August 2011, and in the Revised AFC Appendix F.2, as docketed with the CEC on 9-24-12.

Quail Brush believes the data is representative, and most likely overly-conservative, of the project site due to the following:

- a. The monitoring site is located in a highly commercial/industrial area.
- b. The monitoring site is located in an area which is closely bounded by at least five (5) major freeway interchanges, i.e., 163/52, 163/Clairemont Blvd, I-15/52, I-15/Balboa Ave, and 163/Balboa Ave.
- c. The monitoring site is bounded by and is in close proximity to three (3) major freeways, i.e., 163, I-15, and 52. In addition, Clairemont Blvd lies to the immediate south of the monitoring site, and the 805 freeway lies to the immediate west of the monitoring site as well.

- d. Due west-southwest (approximately 1/3 mile) of the monitoring site lies the Cabrillo Power II LLC turbine power plant site which is comprised of 8 simple cycle turbines and support systems.
- e. To the north of the monitoring site (approximately ½ mile) lies a large area of open space on the north side of Hwy 52, and,
- f. Bounding the commercial/industrial area to the west, south and east, are large tracts of residential homes, apartments, etc.

These surrounding land uses result in a representative mixture of monitored and background air quality values which can be clearly used to establish and/or characterize background for the project site. Collection of air quality data at the site, or in the immediate Santee area is not required. Accordingly, "air quality information for the Santee local region" is not required to be included in the AFC.

**Data Request 32:** *Please provide the quantitative or qualitative comparisons of meteorological and air quality data used to determine that the significant, local features at the project site and surrounding the City of Santee result in on-site wind speed and direction profiles and criteria pollutant concentrations that are represented by the Kearny Mesa monitoring location. If no such information exists, please collect meteorological data at the proposed project site to either justify claims of representativeness or that can be used to more accurately model pollutant dispersion.*

**Response to Data Request 32:** Consistent with the General Objection above, the Applicant objects to this data request because it is unwarranted and has been previously addressed by the Applicant. Meteorological data used in the impact analysis was derived from the Overland Ave monitoring station for the years 2003 through 2005. This data has subsequently been supplemented by two (2) additional years of met data from the Overland Station for 2006-2007. This data was provided and quality assured by the SDAPCD. Please refer to the Ambient Air Quality Network Plan-2011, San Diego APCD-MTSD, June 2012, *available at* [http://www.sdapcd.org/air/reports/2011\\_network\\_plan.pdf](http://www.sdapcd.org/air/reports/2011_network_plan.pdf), and the Memo to Eric Solario, et.al., CEC, from Aerowest, dated 4-2-12 (Revised background AQ data), docketed with the CEC on 4-3-12 as an attachment to the "Minor Changes to the Quail Brush Power Project Air Quality Emissions and Impact Analysis." Discussion of site representativeness criteria are presented in detail in the above noted documents.

**Data Request 33:** *Please obtain air quality data at the proposed site and provide it to the relevant regulatory agencies and public in order to meet the requirements of the Clean Air Act and to provide better local-scale information relevant to the calculation of potential NAAQS exceedances.*

**Response to Data Request 33:** Consistent with the General Objection above, the Applicant objects to this data request because it is unwarranted and has been previously addressed by the Applicant. Please refer to the Response to Data Request 31 for explanation of the Applicant's specific objections and explanations.

**Data Request 34:** *Please provide references that support the statement that CTSCREEN and CTDMPPLUS remain as the preferred models for use in complex terrain. References may be to the scientific literature or to Appendix W. As Appendix W is a rather large document, please provide the specific page number and wording that supports the EPA recommendation for use of CTSCREEN over AERMOD.*

**Response to Data Request 34:** Consistent with the General Objection above, the Applicant objects to this data request because it is unwarranted and has been previously addressed by the Applicant. The air quality dispersion models used in the impact analyses are all approved regulatory models. Please refer to 40 CFR 60, Part 51, Appendix W, 11-9-05. The models have been used in accordance with the pertinent regulatory guidance, and the models have been applied to analysis situations for which they were developed and approved for use. The Applicant is not aware of any model being used inappropriately, or outside of the established regulatory guidance for such models.

**Data Request 35:** *Please provide specific information on the factors in the CTSCREEN modeling that substantially lessened the predicted pollutant concentrations obtained with the EPA preferred air quality model (AERMOD).*

**Response to Data Request 35:** Consistent with the General Objection above, the Applicant objects to this data request because it is unwarranted and has been previously addressed by the Applicant. This data is presented in detail in the Revised AFC Section 4.7.5, dated 9-24-12.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

Regards,



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C. Richard Neff  
Vice President

cc: Docket (11-AFC-3)