

**CALIFORNIA ENERGY COMMISSION**1516 NINTH STREET  
SACRAMENTO, CA 95814-5512

September 5, 2007

Mr. Andy Welch, Vice President  
Competitive Power Ventures  
8403 Colesville Road, Suite 915  
Silver Spring, MD 20910

Dear Mr. Welch:

**PRELIMINARY STAFF ASSESSMENT WORKSHOP SUMMARY AND DATA REQUESTS  
126 THROUGH 129 FOR THE COLUSA GENERATING STATION (06-AFC-9)**

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff is asking for the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This third set of data requests (#126-129) is being made in the area of Air Quality. The attached data requests are in response to E&L Westcoast's request for formal data requests as discussed at the August 22, 2007, Colusa Generating Station (CGS) Preliminary Staff Assessment (PSA) Workshop.

Energy Commission staff intends to delay the publication of the Final Staff Assessment as agreed to by E&L Westcoast at the Colusa PSA workshop. Staff needs supplemental information as discussed at the August 22<sup>nd</sup> workshop that would allow a complete review of the proposed project in the following technical areas; 1) Air Quality, 2) Soils and Water Resources, 3) Worker Safety and Fire Protection, 4) Hazardous Materials and 5) staff review of the new filing for the proposed Glenn-Colusa Canal Bridge Design.

As a result of the PSA workshop, E&L Westcoast has agreed to provide the following supplemental information; a) response to air quality data requests, b) documentation of the three (3) party water transfer agreement between E&L Westcoast, County of Colusa and Glenn-Colusa Irrigation District, and c) suggested mitigation measures as a result of further consultation between the Maxwell Fire Protection District and E&L Westcoast on issues related to the Colusa Generating Station project impacts to that fire protection district. The above information along with staff's review of the new bridge design will complete staff's review of the proposed project and will be included in the Final Staff Assessment. Written responses to the enclosed data requests and supplemental information are due to the Energy Commission staff on or before September 19, 2007, or a date that is mutually agreeable. Staff intends to publish the Final Staff Assessment in October, 2007.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner John L. Geesman, Presiding Committee Member for the Colusa Generating Station project, and to me, within 20 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 653-0062, or email at [jcaswell@energy.state.ca.us](mailto:jcaswell@energy.state.ca.us).

Sincerely,

Jack Caswell, Project Manager  
California Energy Commission

Enclosure

cc: Dockets 06-AFC-9

COLUSA GENERATING STATION  
(06-AFC-9)  
DATA REQUESTS

**Technical Area: Air Quality**

**Author:** William Walters

## **AIR QUALITY EMISSION OFFSETS**

### **BACKGROUND**

Staff is uncertain regarding the disposition of the Emission Reduction Credits (ERCs) that the applicant owns beyond those required to meet District and Energy Commission requirements as specified in the Preliminary Staff Assessment. The list of applicant ERCs in Appendix A of the Air Quality Section provides both VOC and PM<sub>10</sub> ERCs in excess of those required by the District or currently recommended by staff. Additionally, staff is inquiring to the applicant's desire or intent to use its large amount of excess VOC ERCs to increase its proposed 1.4 to 1 VOC for NO<sub>x</sub> interpollutant offset ratio, which was commented on by the Air Resources Board on June 8, 2007. Staff requests the following additional information to more thoroughly understand the disposition of all of the applicant's ERCs.

### **DATA REQUEST**

126. Please identify how the applicant will use, sell, or otherwise dispose of the PM<sub>10</sub> ERCs that are shown to be excess in PSA AIR QUALITY Table 30.
127. Please identify if the applicant would be willing to use all or part of the VOC ERCs, as shown in Appendix A of the PSA Air Quality Section, that are shown to be excess in PSA AIR QUALITY Tables 28 and 29 to increase its proposed interpollutant offset ratio from the currently proposed 1.4 to 1.

## **AIR DISPERSION MODELING IMPACTS**

### **BACKGROUND**

The air quality dispersion modeling indicates potentially significant construction PM<sub>10</sub>/PM<sub>2.5</sub> impacts and potentially significant cumulative NO<sub>2</sub> impacts. These modeling analyses use overly conservative assumptions that can be refined. Staff needs the applicant to perform more refined construction and cumulative modeling runs to determine if there would in fact be a reasonable potential for potentially significant construction PM<sub>10</sub>/PM<sub>2.5</sub> impacts and potentially significant cumulative NO<sub>2</sub> impacts.

### **DATA REQUEST**

128. Please provide a refined construction PM<sub>10</sub>/PM<sub>2.5</sub> modeling analysis using volume sources to model the fugitive dust emissions. This can be done either using the same parameters and locations as used for the equipment exhaust PM emissions or another number of volume sources can be distributed around the

main construction working area of the project site. Please provide an electronic copy of the modeling input and output files with the response.

129. Please provide a refined cumulative NO<sub>2</sub> modeling analysis that matches the hourly monitored NO<sub>2</sub> background, from a representative local ambient monitoring station, with the NO<sub>x</sub>\_OLM dispersion modeling results for the same period modeled. With the response, please provide an electronic copy of any new modeling input and output files and an electronic copy of the hourly NO<sub>2</sub> background data that was obtained.