

Docket Number 06-SPPE-2  
First Round Data Requests  
El Centro Unit 3 Repower Project  
July 2006

**DATA REQUEST #1**  
**AIR QUALITY**

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**BACKGROUND**

Section 6.1.2.4 of the Application for Small Power Plant Exemption (SPPE), and its Appendix 6.1E indicate that the El Centro Unit 3 Repower Project will employ an existing cooling tower, which would be retrofitted with modern drift eliminators to restrict the drift to 0.001 percent of the water recirculation rate. Even with this retrofitting, the application calculates that the cooling tower will emit approximately 2.34 tons per year of particulate matter (PM10). Because the area is non-attainment with respect to the state and federal PM10 standards, best available control technology (BACT) and offsets are required for PM10 emission sources.

The current state of the art drift eliminators can achieve a drift rate of less than 0.0005 percent, which is half of the proposed drift rate. This type of drift eliminator is currently deemed as BACT by other air pollution control or air quality management districts in California.

**DATA REQUEST**

1. Please discuss why the proposed drift eliminator was chosen.

**DATA RESPONSE**

In response to IID's inquiry regarding what could be done to improve drift performance, the manufacturer of the cooling tower (Marley) proposed this particular drift eliminator for installation at Unit 3 cooling tower as it will reduce the drift from 0.002% to 0.001%.