

**CALIFORNIA ENERGY COMMISSION**

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512



December 22, 2008

Doug Wheeler  
Vice President  
GWF Energy LLC  
4300 Railroad Avenue  
Pittsburg, CA 94565

Dear Mr. Wheeler,

**HENRIETTA PEAKER PROJECT AMENDMENT FOR CONVERSION TO GWF  
HENRIETTA COMBINED-CYCLE POWER PLANT (01-AFC-18C) DATA REQUESTS,  
ROUND 2**

Pursuant to Title 20, California Code of Regulations, section 1769, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to more fully understand the modifications proposed in the amendment petition filed on October 14, 2008 by GWF Energy, LLC, project owner, for the proposed Henrietta Combined-Cycle Power Plant Project. These requests are in addition to the first round of data requests, No.s 1-11, sent to GWF on December 9, 2008.

Specifically, the requested information will assist Energy Commission staff to determine whether implementation of the proposed modifications will: 1) allow the Henrietta Combined-Cycle Power Plant to operate in a safe, efficient and reliable manner, 2) comply with applicable laws, ordinances, and regulations, or 2) result in significant environmental impacts.

This set of data requests is being made in the area of Air Quality. Written responses to the enclosed data requests are due to the Energy Commission staff on or before January 22, 2009 or at such later date as may be mutually agreed.

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 Jeffrey Byron, Presiding Siting Committee Member for the Henrietta Peaker Plant Amendment Petition, and to me, within 20 days of receipt of this letter.

**GWF Henrietta Combined Cycle Power Plant (01-AFC-18C)  
Data Requests, Round 2**

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).

If you have any questions, please call me at (916) 654-4748 or E-mail me at [mtrask@energy.state.ca.us](mailto:mtrask@energy.state.ca.us).

Sincerely,

Mathew Trask  
Amendment Project Manager  
Energy Facility Siting Division

Enclosures

**GWF Henrietta Combined Cycle Power Plant (01-AFC-18C)  
Data Requests, Round 2**

**Technical Area: Air Quality**  
**Author:** William Walters

**BACKGROUND: EMISSION REDUCTION CREDITS**

In order to evaluate the air quality impacts from this project staff need to confirm the emission reduction credits (ERCs) that were surrendered for the Henrietta peaker project.

**DATA REQUEST**

12. Please confirm that the ERCs as listed in the December 2001 Henrietta Staff Assessment Air Quality Tables 16 through 19 were surrendered in 2002. If not please provide a modified ERC list that shows the ERCs that were surrendered along with information on:
  - a. the location(s) of reduction;
  - b. the method of reduction; and,
  - c. the date of reduction for each of the ERCs not evaluated in the 2001 staff assessment.

**BACKGROUND: OFFSET PROPOSAL – INTERPOLLUTANT OFFSET RATIOS**

The applicant has proposed the use of interpollutant offsets to show that the emission reduction credits already surrendered for the peaker project are sufficient to offset the amended combined cycle project's annual emissions. Staff needs more information on the proposed interpollutant offset ratios (NOx for VOC and NOx for PM10/PM2.5) to complete the project's mitigation proposal assessment.

**DATA REQUEST**

13. Please provide documentation from the San Joaquin Valley Air Pollution Control District (SJVAPCD) regarding interpollutant offset ratios they would currently recommend for the project area, as follows:
  - a. NOx for VOC
  - b. NOx for PM10/PM2.5

**BACKGROUND – CONSTRUCTION EMISSIONS CALCULATION – VEHICLE CLASS**

The onsite and offsite emissions calculations for on-road vehicles appear to have used incorrect vehicle classes and the offsite emissions do not include paved road dust calculations. Staff needs the applicant to correct any emission calculation errors.

**DATA REQUEST**

14.
  - a. Please verify the classification of offsite delivery trucks, onsite water truck and concrete pump truck as a Heavy Heavy Duty Truck (HHDT) vehicle class, and
  - b. Update the emission calculations using the correct vehicle emission factors where applicable.

**GWF Henrietta Combined Cycle Power Plant (01-AFC-18C)  
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15. Please include an estimate of the paved road dust PM10 and PM2.5 emissions in the offsite emission totals.

**BACKGROUND – CONSTRUCTION GREENHOUSE GAS EMISSIONS**

The Amendment Petition does not include an estimate for construction related greenhouse gas emissions. Staff needs this estimate to complete the greenhouse gas analysis for the project.

**DATA REQUEST**

16. Please provide calculations for the project construction greenhouse gas emissions in CO2-equivalent tons for the entire construction period, and include estimates of total fuel use by type of fuel.

**BACKGROUND: OPERATING EMISSIONS – MODELING ASSUMPTIONS**

The derivation of the modeled emission values presented in Table C3-5 is not clear and there appear to be errors in the values. Staff needs additional information to assess the applicant's operations modeling analysis.

**DATA REQUEST**

17.
  - a. Please provide the specific operating assumptions, in particular the number of startups and shutdowns assumed.
  - b. Provide the explicit calculations used to derive the hourly and annual emissions values provided in Table C3-5.
18. Please identify why the short-term NOx emissions values for simple-cycle and combined-cycle operation shown in Table C3-5 are identical even though the normal operating and startup/shutdown emissions are lower for combined cycle operation, and please identify if similar issues occur for other pollutants and averaging times.

**BACKGROUND: CUMULATIVE IMPACTS**

The Amendment Petition mentions that the Kings County Planning Department was contacted about proposed or foreseeable developments in the site area. However, the San Joaquin Air Pollution Control District should also have been contacted to determine whether any new stationary sources were recently built or are proposed to be built. Staff requests that the applicant make this request to confirm that either no cumulative modeling analysis is necessary or that additional cumulative impact assessment may be necessary for this project.

**DATA REQUEST**

19. Please provide a list of recently built or proposed stationary source projects, within a six mile radius of the project site, from the San Joaquin Air Pollution Control District for the project area.

**GWF Henrietta Combined Cycle Power Plant (01-AFC-18C)  
Data Requests, Round 2**

**BACKGROUND: AIR QUALITY PERMIT/DETERMINATION OF COMPLIANCE**

A Determination of Compliance (DOC) analysis from the SJVAPCD will be needed for staff to complete its analysis. Staff will need to coordinate with the applicant and District to keep apprised of any air quality issues determined by the District during their permit review.

**DATA REQUEST**

20. Please provide copies of any official submittals and correspondence to or from the District within 5 days of their submittal to or their receipt from the District.

**BACKGROUND: AMMONIA SLIP CONCENTRATION**

Staff is unclear on what the applicant is proposing for an ammonia slip concentration limit during simple cycle operation versus what they are proposing during combined cycle operation. A review of this project's amendment request versus the similar Hanford project amendment request shows different assumptions.

**DATA REQUEST**

21. Please provide the proposed ammonia slip concentration limit for simple cycle operation, and the corresponding ammonia mass emission rate in lbs/hour.
22. Please provide the proposed ammonia slip concentration limit for combined cycle operation, and the corresponding ammonia mass emission rate in lbs/hour.