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

June 18, 2002

Bruce E. Blowey
Licensing Project Manager
Southern California Public Power Authority
225 So. Lake Avenue, Suite 1410
Pasadena, CA 91101

Dear Mr. Blowey

MAGNOLIA POWER PROJECT
ZLD SUPPLEMENT DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests 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 set of data requests (#198-206) is being made in the areas of air quality and soils and water resources. These are data requests that are a result of discussions during the recently held workshop. Written responses to the enclosed data requests are due to the Energy Commission staff on or before June 28, 2002, 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 Robert Laurie, Presiding Committee Member for the Magnolia Power Plant Project proceeding, and to me, within 5 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) 653-1245, or E-mail me at jreede@energy.state.ca.us.

Sincerely,

James W. Reede, Jr.
Energy Facility Siting Project Manager

Enclosure
cc: POS

Technical Area: Air Quality
Author: William Walters

BACKGROUND

The cooling tower emission calculations provided by the Applicant make an assumption, using a reference from EPRI, that 38.02% of the particulate emissions from the cooling tower will be airborne PM_{10} emissions that will escape the site, and the other 61.98% of the particulate emissions will be deposited on the site. The Applicant has not identified the final disposition (i.e. mass balance) for the remaining 61.98% of the particulate emissions from the cooling tower.

DATA REQUEST

198. Please identify how the particulate emissions from the cooling tower, that fraction not assumed to leave the site as airborne PM_{10} emissions, are collected onsite and disposed. Also, please identify any associated PM_{10} emissions that would be reasonably expected to occur by wind entrainment or through the physical collection and disposal of this particulate matter.

BACKGROUND

Staff has proposed to the Applicant a potential method for the creation of PM_{10} emission reduction credits (ERCs) that would be acceptable for use to mitigate the project's cooling tower PM_{10} emissions. These ERCs would be created through the reduction of emissions from the existing cooling towers at the Magnolia site. These PM_{10} emission reductions, since the cooling towers are not permitted by SCAQMD, would generally not be allowed to create ERCs in the District's bank. However, for CEQA emission mitigation purposes the full value of the emission mitigation, as long as it was verifiable, would be available to be used to mitigate the project's cooling tower emissions. Staff believes that the most effective and desirable emission reductions are contemporaneous onsite emission reductions, and therefore staff has the following desired ranking of potential CEQA PM_{10} ERC generation methods:

- Control of emissions from existing onsite cooling tower(s) that will remain in operation,
- Shutdown of existing onsite cooling tower(s), due to or contemporaneous with the construction or operation of the project, and
- Shutdown of onsite cooling tower(s) prior to construction of the project.

Additionally, staff would only allow these CEQA PM_{10} ERCs to be used to mitigate the project's cooling tower emissions, and staff will likely only consider undiscounted emission reductions that have occurred no earlier than 3 years prior to the anticipated project construction startup date.

DATA REQUEST

199. Please identify the potential for PM_{10} emission reductions through the retrofit of mist eliminators on existing cooling towers and through the shutdown of cooling towers in the order of preference as listed above. The data response should include the identification of potential PM_{10} emission reductions on all currently active and all recently retired cooling towers. In addition, this response can also include a specific CEQA ERC proposal. The data required for CEQA ERC proposal would include historic operating data (i.e. recirculation rates, and TDS levels), existing cooling tower drift fraction information and as appropriate the retrofit drift control information or cooling tower shutdown date.

Soil and Water Resources
Authors: Jim Schoonmaker and Rich Sapudar

BACKGROUND

During the workshop of June 11, 2002, there was some limited discussion concerning the need for flexibility in providing water to the project in order to balance the many competing demands on the COB Water Department. There was limited discussion concerning the "adjudicated basin" and the City's need to withdraw from the basin in compliance with competing demands, including those necessitated by cleanup of the "superfund" contamination, and the requirements for pumping and remediation of groundwater contamination contained in the "consent decree".

DATA REQUEST

200. Please provide a more detailed discussion of the factors involved in the management of the various water resources. Include the limitations that are imposed by the consent decree. Please discuss how the City Water Department manages the various limitations and why that resource management is said to necessitate that no restriction be placed on the use of potable water for cooling purposes at the Magnolia Project. What is the average annual contribution of treated groundwater in the COB water supply?

201. Describe the operation of the COB's pump and treat program(s) under the consent decree. What are the limiting factors for the COB not reaching and maintaining the amounts of treated groundwater required by the consent decree?

202. How much water is pumped and what is the disposition of this water? Is this treated water used by COB for M&I purposes, aquifer recharge, sold as a commodity, etc? Does the ability of COB to use, transfer, or discharge the treated groundwater have any relationship to the amount of groundwater that is pumped and treated, and if so, what is it?

BACKGROUND

During the workshop of June 11, 2002, the Manager of the Water Department stated that water consumption in the City has been decreasing with time, the peak having been that experienced in 1970. It was further stated that the City of Burbank is a "built-out" City – no further undeveloped area available – and therefore it appeared not likely that increases in water use would occur in the future.

DATA REQUEST:

203. Please discuss the probable impact of the stable or decreasing consumption of water by the COB as regards the competing regulatory constraints and/or decrees and the adjudication of the groundwater basin imposed upon the City's water management requirements.

BACKGROUND:

During the workshop of June 11, 2002, statements were made that the City was internally motivated to increase the usage of reclaimed water, and that the "85% of the price of fresh water" fee being placed on the new Magnolia Power Project water supply would provide an income that would make expansion of the use of reclaimed water more practical.

DATA REQUEST:

204. Is this price to be placed on all cooling water to the project, whether sourced from on-site wells, SWP or other potable sources, or is this price to be only for reclaimed water supply?

205. Is it correct to conclude that expansion of the reclaimed water as a product for sale to other entities require that some form of "subsidy" or "support" be available, such as the high usage customer that is inherent in the MPP?

206. In the event that some future City Administration concluded that the supply of reclaimed water is not cost-effective and reduced the production of reclaimed water to extent the amount no longer met the cooling needs of MPP, what water source would be used to cool MPP?