DATA REQUEST #1
AIR QUALITY

BACKGROUND

Diesel Fuel for Fire Pump Engine: Appendix B, Attachment C lists the expected emissions of the fire pump engine using standard diesel fuel. Staff believes that the use of ultra-low sulfur diesel, which contains no more than 15 ppm sulfur, can further reduce the facility's oxides of sulfur (SO_x) and particulate matter (PM) emissions liability.

DATA REQUEST

1. Please provide a discussion regarding the feasibility of using ultra-low sulfur diesel as fuel for the fire pump engine.

DATA RESPONSE

The testing requirements of the fire pump engine will require approximately 31.5 MMBtu per year or 217 to 228 gallons per year of diesel fuel (depending on specified fuel and heat content). Applicant believes that this quantity of diesel fuel to test the fire pump has negligible and undetectable impacts on SO_x and PM emissions on an annual basis.

Suppliers and distributors in Imperial County do not currently carry ultra-low sulfur diesel fuel. The likely fuel terminal for supply of ultra-low sulfur diesel fuel would be the Kinder Morgan - Los Angeles terminal. Based on discussions with local suppliers and distributors, the cost of the ultra-low sulfur diesel fuel, transported from Los Angeles to Imperial County, is estimated to be 50% higher than the proposed diesel fuel, excluding incremental administrative costs.

However, local suppliers and distributors have indicated that ultra-low sulfur diesel fuel may be transported by pipeline to Imperial County as early as August 2006. Locally supplied fuel ensures a fresh and stable fuel supply, given inventory turnover of local suppliers. In addition, based on discussions with suppliers and distributors, once the ultra-low sulfur fuel is transported via pipeline to Imperial County, the price differential is estimated to be less than 5%.

Contact information for local fuel suppliers and distributors has been provided for staff's use to verify the anticipated local access to ultra-low sulfur fuel.

Imperial County Supplier	Contact Name	Phone Number
McNeece Brothers	Steve Cochran	(760) 455-7287
	Paul Woo	(760) 352-4721
SOCO	Robert Rivera	(760) 352-4683
Trinity	Carlos Corral	(760) 355-7900

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Given the information presented above, Applicant agrees to utilize ultra-low sulfur diesel fuel at such time as it becomes available from local suppliers and distributors in Imperial County.

Applicant has committed to require the use of ultra-low sulfur diesel fuel for all equipment operations during the construction period. As stated in SPPE Section 6.1 Air Quality, Section 6.1.2.1 Construction Emissions, "The Project engineering contractor provided a list of equipment needed during each month of the construction effort. This list provided the basis for estimating pollutant emissions throughout the term of construction, and helped to identify the periods of probable maximum short-term emissions. An ultra-low fuel sulfur content of 0.0015 percent by weight (15 ppm) was assumed for all diesel equipment operations."