

Memorandum

Date : October 1, 1999
Telephone: ATSS ()
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File: OtayMesa.daltr2.doc

To : William J. Keese, Chairman
David A Rohy, Vice Chair
Michal C. Moore
Robert A. Laurie
Robert Pernel

From : **California Energy Commission** - KENT SMITH
1516 Ninth Street Acting Executive Director
Sacramento, CA 95814-5512

Subject : **ADDENDUM TO DATA ADEQUACY RECOMMENDATION FOR THE OTAY MESA GENERATING PROJECT - (99-AFC-5)**

On October 1, 1999 the staff received a copy of a letter from the San Diego Air Pollution Control District to the Otay Mesa Generating Company, LLC, stating that the Otay Mesa application is complete. The staff has completed its data adequacy review of the AFC submitted on August 2, 1999, the AFC Supplements submitted on September 10, 1999 and September 28, 1999, and the District's October 1, 1999 letter. I have determined that the AFC now contains all the information required by Cal. Code of Regs., tit. 20, § 1704, Appendix B.

Attachment A contains a revised checklist for data adequacy in each technical discipline and Attachment B contains revised air quality data adequacy sheets. Please use these sheets marked "Adequate" to replace the air quality sheets sent to you in my September 30 data adequacy recommendation memo and related attachments. Attachment C contains the District's letter to the Otay Mesa Generating Company. At the Energy Commission's business meeting on October 6, 1999, I will be recommending that the Energy Commission accept the AFC as adequate.

If you have any questions, please call Eileen Allen, staff's Project Manager, at (916) 654-4082.

KS:EA:ea

Attachments

cc:Sharon Segner
Allan Thompson

ATTACHMENT A
OVERVIEW OF ENERGY COMMISSION STAFF'S
DATA ADEQUACY DETERMINATION
OTAY MESA GENERATING PROJECT 99-AFC-5

TECHNICAL AREA	ATTACHMENT B PAGE No.	ADEQUATE?
AIR QUALITY	3	YES
ALTERNATIVES	7	YES
BIOLOGICAL RESOURCES.....	8	YES
CULTURAL RESOURCES	12	YES
EFFICIENCY	17	YES
GEOLOGICAL HAZARDS	20	YES
HAZARDOUS MATERIALS HANDLING	22	YES
LAND USE	24	YES
NOISE	28	YES
PALEONTOLOGICAL RESOURCES.....	31	YES
PROJECT OVERVIEW.....	33	YES
DEMAND CONFORMANCE.....	35	YES
PUBLIC HEALTH	36	YES
RELIABILITY	38	YES
TRAFFIC AND TRANSPORTATION.....	39	YES
SOCIOECONOMICS	43	YES
SOILS.....	46	YES
T-LINE SAFETY AND NUISANCE	48	YES
TRANSMISSION SYSTEM ENGINEERING	51	YES
VISUAL RESOURCES.....	53	YES
WASTE MANAGEMENT.....	56	YES
WATER RESOURCES	59	YES
WORKER SAFETY	62	YES
SAN DIEGO AIR POLLUTION CONTROL DISTRICT ...	63	YES

ATTACHMENT B

**ENERGY COMMISSION STAFF'S
Revised Air Quality Data Adequacy Sheets**

**Otay Mesa Generating Project
99-AFC-5**

October 1, 1999

Adequacy Issue: Adequate Inadequate

DATA ADEQUACY WORKSHEET

Revision No. 2 Date September 17, 1999, ~~October 1, 1999~~

Technical Area: Air Quality
 Project Manager: Eileen Allen

Project: Otay Mesa Generating Project
 Docket: 99-AFC-5

Technical Staff: Matt Layton
 Technical Senior: Chris Tooker

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	3.2 5.2 Table 5.2-9, -10 Appendix I	Yes	
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	ATC application 3.2 5.2 Table 5.2-9, -10 Appendix I	No Yes	We need a letter from the District documenting their completeness review and findings. Per the 22-Sep-99 letter from the District, they are incomplete, pending resolution of 11 issues re: MERCs. Per the 1 October, 1999 letter from the District, they are complete.
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	3.4.10 3.5.2 5.2.3.2 5.2.3.2.2 Table 5.2-14 10.Sep.99 Supplemental filing	No Yes	Please identify the chemical characteristics of the natural gas fuel used at the facility.
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	5.2.2.1	Yes	
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	3.4.4	Yes	
Appendix B (g) (8) (E)	The emission rates of criteria pollutants from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all secondary emission sources.	3.4.3 Figures 3.4-1A,B,C 3.4.10 Table 5.2-15	Yes	

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Appendix B (g) (8) (F)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	5.2.3.2.2	Yes	
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	5.2.1.2 5.2.1.3 5.2.1.4 Table 5.2-6	Yes	
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	5.2.1.4 Modeling CD Appendix I-1	Yes	
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995), which is incorporated by reference in its entirety.)	5.2.1.4 Appendix I-1	Yes	
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Appendix I-1	Yes	
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of the following:	----	----	----

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Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct inert pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM ₁₀) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO _x), sulfur dioxide (SO ₂), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM ₁₀)] from construction-related equipment;	5.2.3.2 Modeling CD Appendix I	Yes	
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct inert criteria pollutant (NO _x , SO ₂ , CO and PM ₁₀) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions; and	5.2.3.2 Modeling CD Appendix I	Yes	
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a six mile radius which have received construction permits but are not yet operational, or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard.	5.2.3.3 5.18	Yes	
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under subsection (g)(1), provide the following information:	----	----	----

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Appendix B (g) (8) (J) (i)	The quantity of offsets needed;	5.2.1.3.2 5.2.4 Appendix I-7 Confidential filing 10.Sep.99 Supplemental filing	No <u>Yes</u>	Please clarify whether the NOx emissions will be limited to 100 tpy, the quantity of offsets necessary, and the appropriate offset ratios required.
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions; and	5.2.1.3.2 5.2.4 Appendix I-7 Confidential filing 10.Sep.99 Supplemental Filing 20.Sep99 Confidential Filing	Yes	
Appendix B (g) (8) (J) (iii)	Method of emission reduction.	5.2.1.3.2 5.2.4 Appendix I-7 Confidential filing	Yes	
Appendix B (g) (8) (K)	A topographic map containing contour and elevation data, at a scale of 1:24,000, showing the area within 6 miles of the power plant site.	Map3.2-1	Yes	
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	5.2.1.3 Table 7.0-1	Yes	
Appendix B (h) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	5.2.1.3 Table 7.0-1	Yes	

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Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	5.2.1.3 Table 7.0-1	Yes	
Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.	Table 7.0-1, 10.Sep.99 Supplemental filing	No <u>Yes</u>	Please include: Mr. Michael Tollstrup Stationary Source Division California Air Resources Board 2020 L Street Sacramento, CA 95812 916.323.8473 Mr. Chris Gallenstein California Air Resources Board 2020 L Street Sacramento, CA 95812 916.322.6403 Mr. David Wampler U.S.EPA, Region 9 Office 75 Hawthorne San Francisco, CA 94105 415.744.1256
Appendix B (h) (4)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	3.2 5.2 Table 5.2-9, -10 Appendix I ATC application	Yes	

ATTACHMENT C

SAN DIEGO AIR POLLUTION CONTROL DISTRICT'S
10/1/99 LETTER TO
OTAY MESA GENERATING COMPANY, LLC