

III. Comments On the Presiding Member's Proposed Decision.

Air Quality – Comment 1

Page 102, paragraph 1, line 1:

The project site is located in the San Diego County Air Basin, within the jurisdiction of the SDAPCD. Air quality in the SDAPCD is in attainment with federal and state standards for SO₂, NO₂ and CO, and the federal PM₁₀ standard, ~~and is~~ nonattainment for the state ~~and federal~~ ozone standards and the state PM₁₀ standard, and at the close of Evidentiary Hearings, was nonattainment for the federal ozone standard. (Ex. 1, pp. 5.2-4 et seq.) A final rule was published in the Federal Register on June 26, 2003 that changed the designation for the federal 1-hour zone standard to attainment, effective July 28, 2003. (68 Federal Register 37976)

Page 122, paragraph 3:

“3. The Air District is a nonattainment area for the state ~~and federal~~ 1-hour ozone and PM₁₀ standards; the Air District is in attainment for federal 1-hour ozone and PM₁₀ standards and state and federal NO₂, CO, SO₂ and lead standards. The District has not yet been classified regarding PM_{2.5} standards.”

The Committee may also wish to revise Air Quality Table 2, page 10, to reflect the redesignation by changing the federal classification for ozone from “Serious Nonattainment” to “Attainment.”

The purpose of these revisions is to reflect the updated federal attainment status for ozone.

Air Quality – Comment 2

Page 110, paragraph 2, line 1:

According to Staff, direct impacts of PM₁₀ are significant since they would contribute to existing violations of the state 24-hour standard. (Ex. 50, p. 4.1-26, 4/28/03 RT, p. 245.). The Applicant disagrees with the presumption that the project's PM₁₀ impacts are significant (Ex. 17, Section 2.1; Ex. 35, Head, page 13; RT 4/28/03, page 217).

The purpose of this revision is to reflect the Applicant's position along with that of Staff.

Air Quality – Comment 3 (typographical errors)

Page 101, footnote “a”:

This footnote should be deleted because it is not referenced and is redundant with footnote 6 to Air Quality Table 1.

Page 104, paragraph 1, line 5:

The U.S. EPA ~~San Diego~~ recently found the San Diego Air Basin has attained the one-hour NAAQS for ozone¹⁴.

Page 109, paragraph 3, line 3:

Maximum hourly emissions for the CTG and cooling tower were modeled for each pollutant to determine the short-term (one-hour, three-hour, eight-hour, and 24-hour) and long-term (annual) impacts for ~~lead-following~~ startup (cold and warm), shutdown, and normal operations with duct firing and without duct firing.

Page 109, footnote 18:

¹⁸ The drift eliminator is designed to control drift fraction to 0.0005 percent of circulating water flow. According to Applicant, drift emissions should be quantified on an assumption that 50 percent of total dissolved solids (TDS) in the cooling water eventually become airborne PM₁₀ and a 50 percent fraction remain larger particles. (Ex. 1, Appendix E.3-2.) Staff was concerned about the accuracy of this assertion and therefore assumed that 100 percent of the TDS would be emitted to the ambient air as PM₁₀ to establish worst case ~~offset mitigation~~ requirements. (Ex. 50, pp. 4.1- 19 and 4.1-20) The SDAPCD analyzed the project using a 100 percent estimate and determined that it would not alter anticipated impacts. (Ex. 22; Ex. 50, p. 4.1-19.) Condition of Certification AQ-SC9 establishes limits for cooling tower PM₁₀ emissions.

Page 116, paragraph 1, line 8:

Conditions of Certification AQ-SC8 and AQ-SC9 require the project owner to install a circulating water flow meter in the cooling tower to record daily flow, ~~(showing to measure~~ the TDS, pH, and ammonia concentrations) ~~quarterly~~, and to limit annual cooling tower PM₁₀ emissions to 5.7 tpy.

Page 117, paragraph 1, line 5:

PM₁₀ Emissions: 14 lb/~~hr day~~ (with or without duct firing)
SO₂ Emissions: natural gas with 0.75 ~~g~~ grains of sulfur per 100 cubic feet

Page 118, Air Quality Table 16:

The entry under “Offset Liability” for “NOx, tpy with cap” should be revised from 105.0 to 104.3, and the entry under “SDAPCD required ERCs” in the same row should be revised from 126.0 to 125.2.

Page 120, paragraph 1, line 8:

Based on this result, there is no evidence that the project will result in a significant ~~to~~ cumulative impacts. (Ex. 50, p. 4.1-41; Ex. 1, p. 5.2-44 et seq.)