

AIR QUALITY ADDENDUM/ERRATA
 Testimony of William Walters P.E

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CORRECTIONS/REVISIONS TO THE AIR QUALITY TESTIMONY

Southern California Public Power Authority (SCPPA), the Canyon Power Plant (CPP), project applicant, has requested a revision to a portion of Staff Condition of Certification **AQ-SC3** (subpart I.) and has noted that a correction is necessary to the verification for District Condition of Certification **AQ-16**. Staff agrees that considering the nature of the project site (small site footprint with limited onsite traffic mileage) that their request to revise the frequency for the onsite paved road sweeping is reasonable and would not adversely impact air quality emissions during construction. Staff also agrees with the requested correction to the staff's verification of District condition **AQ-16**. The recommended revision and correction are provided below in underline and strikethrough.

Staff Condition Revision

AQ-SC3 Construction Fugitive Dust Control: The AQCM shall submit documentation to the CPM in each Monthly Compliance Report (MCR) that demonstrates compliance with the following mitigation measures for the purposes of preventing all fugitive dust plumes from leaving the project site and linear facility routes. Any deviation from the following mitigation measures shall require prior CPM notification and approval.

- A. All unpaved roads and disturbed areas in the project and linear construction sites shall be watered as frequently as necessary to comply with the dust mitigation objectives of **AQ-SC4**. The frequency of watering may be reduced or eliminated during periods of precipitation.
- B. No vehicle shall exceed 10 miles per hour within the construction site.
- C. The construction site entrances shall be posted with visible speed limit signs.
- D. All construction equipment vehicle tires shall be inspected and washed as necessary to be cleaned free of dirt prior to entering paved roadways.
- E. Gravel ramps of at least 20 feet in length must be provided at the tire washing/cleaning station.
- F. All unpaved exits from the construction site shall be graveled or treated to prevent track-out to public roadways.
- G. All construction vehicles shall enter the construction site through the treated entrance roadways, unless an alternative route has been submitted to and approved by the CPM.

- H. Construction areas adjacent to any paved roadway shall be provided with sandbags or other measures as specified in the Storm Water Pollution Prevention Plan (SWPPP) to prevent run-off to roadways.
- I. All paved roads within the construction site shall be swept once at least twice daily (or less during periods of precipitation, or more often as determined necessary by the AQCMM as conditions warrant) on days when construction activity occurs to prevent the accumulation of dirt and debris.
- J. At least the first 500 feet of any public roadway exiting from the construction site shall be swept at least twice daily (or less during periods of precipitation) on days when construction activity occurs or on any other day when dirt or runoff from the construction site is visible on the public roadways.
- K. All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered, or shall be treated with appropriate dust suppressant compounds.
- L. All vehicles that are used to transport solid bulk material on public roadways and that have the potential to cause visible emissions from the material shall be provided with a cover, or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard.
- M. Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction areas that may be disturbed. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation.
- N. SCAQMD Rule 403 required mitigation measures shall apply when they are more stringent than measures a) through m).

Verification: The project owner shall include in the MCR (1) a summary of all actions taken to maintain compliance with this condition, (2) copies of any complaints filed with the air district in relation to project construction, and (3) any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.

District Condition Verification Correction

AQ-16 The 5 ppmv NH₃ emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry basis. The project owner shall calculate and continuously record the NH₃ slip concentration using the following equation.

District Requirement

NH_3 (ppmv) = $[a - b * c / 1E6] * 1E6 / b$; where

a = NH₃ injection rate (lbs/hr)/17 (lbs/lbs-mol)

b = dry exhaust gas flow rate (scf/hr)/385.3 (scf/lbs-mol)

c = change in measured NO_x across the SCR (ppmvd at 15 percent O₂)

The project owner shall install and maintain a NO_x analyzer to measure the SCR inlet NO_x ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months.

The NO_x analyzer shall be installed and operated within 90 days of initial start-up.

The project owner shall use the above described method or another alternative method approved by the District's Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

[RULE 1303(a)(1) – BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: C4, C10, C16, C22]

Verification: The project owner shall include ammonia slip concentrations averaged on an hourly basis as part of the Quarterly Operation Report (**AQ-SC10**). The project owner shall submit all SCR inlet NO_x analyzer calibration results to the CPM within 60 days of the calibration date. Exceedances of the ammonia limit shall be reported and chronic exceedances of the ammonia slip limit, defined as occurring more than 10 percent of the operation for any single ~~HRSG turbine~~ exhaust stack, shall be identified by the project owner and confirmed by the CPM within 60 days of the submitted Quarterly Operation Report (**AQ-SC10**) that indicates chronic exceedances. If a chronic exceedance is identified and confirmed, the project owner shall work in conjunction with the CPM to develop a reasonable compliance plan to investigate and redress the chronic exceedance of the ammonia slip limit within 60 days of the above confirmation.