

Monterey Bay Unified Air Pollution Control District  
24580 Silver Cloud Court  
Monterey, CA 93940

September 4, 1997

Bruce Kaneshiro, Project Manager  
c/o Environmental Science Associates  
225 Bush Street, Ste. 1700  
San Francisco, CA 94104

SUBJECT: NEGATIVE DECLARATION AND INITIAL STUDY FOR PG&E'S  
APPLICATION 96-11-020

Dear Mr. Kaneshiro:

Staff has reviewed the Initial Study and Negative Declaration for the proposed project and has the following comments:

[\[Begin MBUAPCD-1\]](#)

1. Mitigation Measures - Section 4.5.a.2 of the Negative Declaration states, "PG&E agrees that the transfer of title for Morro Bay Power Plant will not occur until either Rule 431 or the plant is permit to operate has been modified." This section should reference the Moss Landing Power Plant rather than Morro Bay Power Plant and correct the typo, i.e., "plant is permit".

[\[End MBUAPCD-1\]](#)

[\[Begin MBUAPCD-2\]](#)

2. Nonattainment Status - Table 4.5.2 should be revised to reflect the following attainment status of the NCCAB:

<b>Pollutant</b>	<b>Federal</b>	<b>State</b>
Ozone	Attainment	Nonattainment
Carbon Monoxide	Unclassified/ attainment	Monterey-Attainment San Benito-Unclassified Santa Cruz-Unclassified
Nitrogen Dioxide	Unclassified/ attainment	Attainment
Sulfur Dioxide	Unclassified	Attainment
PM10	Unclassified	Nonattainment

[\[End MBUAPCD-2\]](#)

[\[Begin MBUAPCD-3\]](#)

3. 1991 AQMP - Page 4.5.12 should be revised to indicate that the 1991 AQMP was updated in 1994, that the 1994 AQMP addresses attainment of the State ozone standard only, and includes a revised design value which reduced emission reductions needed to achieve the State ozone standard from 30% to 20%. With the revised design value, no additional control measures were needed beyond those adopted between 1991 and 1994.

[\[End MBUAPCD-3\]](#)

[\[Begin MBUAPCD-4\]](#)

4. Predominant Winds - Page 4.5.19 states that the predominant winds at Moss landing are from the NNW with speeds averaging 4-8 mph. Based on wind frequency data from the Moss West site, obtained during our Moss Landing Air Monitoring study, prevailing winds were from the W, as a result of the day time sea breeze. An important secondary component from the ESE was also evident, largely due to the reverse land breeze or drainage flow which occurs primarily at night. This pattern is consistent with a classical sea breeze/land breeze situation. There was very little occurrence of winds from the NNW. In addition, annual average winds averaged about 8 mph with substantially higher winds during the afternoon when the sea breeze is strongest.

[\[End MBUAPCD-4\]](#)

[\[Begin MBUAPCD-5\]](#)

5. Capacitance - Page 4.5.19 indicates that in 1993 Units 6 and 7 were utilized together approximately 54.4% of the time. It is not clear how to interpret this statement. In particular, it would be useful to clarify if this figure represents how often the two units operated simultaneously or if it represents simple operational service hours irrespective of load or if it is the combined capacitance factor of the two units, which is related to the plant's capacity to generate steam. The capacitance factor is more useful because it indicates how close to generating capacity the units were actually operating during a given period of time.

[\[End MBUAPCD-5\]](#)

[\[Begin MBUAPCD-6\]](#)

6. County Level Comparisons - In Table 4.5.5, emissions from the Moss Landing Power Plant (MLPP) are compared to those of Monterey County alone. For air basin planning purposes, emissions for important categories are generally compared to the totals for the entire air basin, which in the case of the North Central Coast Air Basin, also includes Santa Cruz and San Benito Counties.

[\[End MBUAPCD-6\]](#)

[\[Begin MBUAPCD-7\]](#)

7. Mobile Source Inventory - In Table 4.5.5, annual criteria emissions for mobile sources in

Monterey County are presented and are then compared with 1993 emissions from the MLPP. In comparing these figures with Monterey county mobile source emissions presented in the 1993 Emission Inventory, published by the Air Resources Board in June of 1995, it appears that the emission figures for on-road motor vehicles were based on an older version of the on-road vehicle emission estimation model. The model that was current in June of 1995 was known as EMFAC7F1.1. Emission estimates from the current model (MVEI7G) are significantly higher which could affect the comparisons, particularly for NOx.

[\[End MBUAPCD-7\]](#)

[\[Begin MBUAPCD-8\]](#)

8. Natural Emissions - Emissions estimates for natural sources presented in Table 4.5.5 appear to be significantly underestimated. Again in comparing these figures with ARB's published 1993 Emission Inventory, it appears that the natural source figures are based on an incomplete total which only includes wildfires. Had the other sub-categories been included, particularly biogenic wildfires. Had the other sub-categories been included, particularly biogenic ROG emissions from vegetation, the totals would be substantially higher. Since this category appears to be incomplete, it would probably be best to completely omit it from the table.

[\[End MBUAPCD-8\]](#)

Thank you for the opportunity to review the document. Please do not hesitate to call if you have any questions.

Sincerely,

/s/

Janet Brennan  
Supervising Air Quality Planner  
Planning and Air Monitoring Division

c: Nicolas Papadakis, AMBAG  
Fred Thoits, MBUAPCD  
Bob Nunes, MBUAPCD

# MBUAPCD - MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT

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## MBUAPCD-1.

On page 4 of the Mitigated Negative Declaration, the first sentence of the third paragraph of mitigation measure 4.5.a.2 is revised as follows:

PG&E agrees that the transfer of title for ~~Morro Bay~~ Moss Landing Power Plant will not occur until either Rule 431 or the plant's is-permit to operate has been so modified.

## MBUAPCD-2.

No changes are needed to the table for ozone, sulfur dioxide, and PM10. To reflect the information provided by the MBUAPCD, Table 4.5.2 for the North Central Coast is revised for carbon monoxide and nitrogen dioxide as follows:

### North Central Coast Air Basin

<u>Pollutant</u>	<u>National</u>	<u>State</u>
Ozone	Attainment	Nonattainment
Carbon Monoxide	<u>Unclassified/attainment</u>	<u>Monterey-Attainment</u> <u>San Benito-Unclassified</u> <u>Santa Cruz-Unclassified</u>
Nitrogen Dioxide	<u>Unclassified/attainment</u>	Attainment
Sulfur Dioxide	Unclassified	Attainment
Particulate Matter (PM10)	Unclassified	Nonattainment

## MBUAPCD-3.

On page 4.5.12 of the Initial Study, the first two paragraphs of the Regulations, Plans and Policies Section are revised as follows:

### **Regulations, Plans, and Policies**

The 1991 Air Quality Management Plan (AQMP) for the Monterey Bay Region addresses attainment of air quality standards for ozone and inhalable particulate matter (PM10) within Monterey, San Benito, and Santa Cruz counties. The AQMP addresses state planning requirements and establishes the basis for meeting federal requirements. CARB determined that a 30% reduction of those emissions leading to the formation of ozone is required to achieve the standard in the North Central Coast Air Basin. The 1991 AQMP was updated in 1994, and the 1994 AQMP addresses attainment of the State ozone standard only. The 1994 AQMP includes a revised design value which reduced emission reductions needed to achieve the State ozone standard from 30% to 20%. With

the revised design value, no additional control measures were needed beyond those adopted between 1991 and 1994 (Brennan, 1997).

#### MBUAPCD-4.

The wind speed and direction data cited on page 4.5.19 of the Initial Study were taken verbatim from PG&E's *Proponent's Environmental Assessment (PEA)*. Further review of the PEA data show the wind direction data referenced was taken from Monterey and Salinas. Regardless of which data set is more suitable, the result will not change the conclusions with respect to the Moss Landing Plant under divestiture. The Moss West site data mentioned appears more representative and will be used. Use of the Moss West site data does not change the conclusion that air quality impacts of the project would still be less than significant.

The last two sentences of the first full paragraph on page 4.5.19 is revised as follows:

The predominant wind direction at the site is from the west north-northwest, with and an average windspeeds range from 4 to 8 miles per hour. An important secondary wind flow component is also observed from the east-southeast which is typically observed at night as a nocturnal drainage flow. Daily and seasonal variations are small.

#### MBUAPCD-5.

To provide clarification the second sentence of the fifth paragraph on page 4.5.19 is revised as follows:

In 1993, units 6 and 7 together had a capacity factor of 54.4% were utilized approximately 54.4% of the time.

#### MBUAPCD-6.

As noted on page 4.5.20 of the Initial Study, the source of Table 4.5.5 was PG&E's *Proponent's Environmental Assessment: Pacific Gas and Electric Company's Proposed Sale of Four Generating Plants*, with minor modifications by Environmental Science Associates. The District suggests potential problems with the underlying data and analytical approach in this comment and in Comments MBUAPCD-7 and MBUAPCD-8. Each of the suggested changes in these three comments would decrease the percentage contribution of the Moss Landing Power Plant in comparison to county-wide emissions or, as this comment suggests, total air basin-wide emissions. A decrease in the relative contribution of the Moss Landing Power Plant emissions to other sources would not change the conclusion of the Initial Study that air quality impacts of the project would be less than significant.

#### MBUAPCD-7.

Please refer to response to MBUAPCD-6. The described changes would increase mobile source emissions shown in Table 4.5.5 of the Initial Study and reduce the percentage contribution of the Moss Landing Power Plant to total emission sources in the entire air basin. A decrease in the relative contribution of the Moss Landing Power Plant emissions to other sources would not change the conclusion of the Initial Study that air quality impacts of the project would be less than significant.

#### MBUAPCD-8.

Please refer to response to MBUAPCD-6 and MBUAPCD-7. The described changes would increase emissions from natural sources above the levels shown in Table 4.5.5 of the Initial Study and reduce the percentage contribution of the Moss Landing Power Plant to total emission sources in the entire air basin. A decrease in the relative contribution of the Moss Landing Power Plant emissions to other sources would not change the conclusion of the Initial Study that air quality impacts of the project would be less than significant.

#### REFERENCES:

Brennan, Janet, Supervising Air Quality Planner, Monterey Bay Unified Air Pollution Control District, Planning and Air Monitoring Division, letter to CPUC, September 4, 1997.