



December 12, 2008

Brian K. Lusher  
Air Quality Engineer II  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

**Subject: Application Number 18404, Plant Number 19169  
Submittal of Responses to Questions – Marsh Landing Generating Station**

Dear Mr. Lusher:

Mirant Marsh Landing LLC, is providing responses to questions received on December 3, 2008 from Jane Lundquist of your staff. The applicant was requested to provide the following:

1. The shoreline fumigation analysis did not include the impacts for TIBL factors 3 and 5. In your revised fumigation analysis, include the impacts for TIBL factors 2, 3, 4, 5, and 6 in the shoreline fumigation analysis.
2. The maximum predicted impact for one-hour NO<sub>2</sub> and CO occurred during shoreline fumigation. These values should be added to the background and compared to the ambient air quality standards.
3. Include a visibility impact analysis. EPA's VISCREEN model should be used for a screening level analysis.
4. Include an evaluation of the project's impacts on soils and vegetation.
5. Include an evaluation of the potential impacts due to associated growth.

Our responses to these requests are provided below.

### **Response to Items 1 and 2, Fumigation Modeling**

Items 1 and 2 have been addressed in the applicant's Responses to Data Request Set 1 submitted to the CEC on December 12, 2008. In particular, please see responses to Data Requests 7 and 8. A copy of this document and the CD containing the revised modeling files are enclosed with this submittal.

### **Response to Items 3 and 4, Visibility Impacts and Soils Impacts**

The applicant believes that these items can not be provided for the reasons discussed below. For sources that are less than 50 km away from a Class I area, "EPA has recommended a methodology to assess impacts due to coherent plumes. A guideline, for when these steady state conditions apply, is

residential housing, schools, retail suppliers, and additional local business or industry to provide materials and support services for the facility.

The Marsh Landing Generating Station (MLGS) would occupy approximately 27 acres within the western portion of the Contra Costa Power Plant (CCPP) property. The project will occupy an already developed industrial site dedicated to electricity generation. Therefore, there will be little or no associated industrial, commercial, or residential growth as a result of this project. In addition, the electrical generating capacity from the project will be connected into a regional electrical supply grid and therefore the proposed project does not stimulate local growth.

The applicant estimates that operation and maintenance of the project would require 20 skilled full-time employees (Marsh Landing Generating Station AFC (08-AFC-3), May 2008, Table 2.8-1). To the extent practicable, the applicant has committed to give local preference in hiring and procurements. Therefore, there will be no significant impact on local employment associated with the operation and maintenance of the project.

Based on the location, electricity distribution, and estimated workforce of the proposed project, no significant growth is expected to result from the proposed project.

Please contact me at 510.874.3055 if you have any questions or require additional information.

Sincerely,

**URS CORPORATION**



Mark A. Strehlow, P.E.  
Leader, Air Quality  
URS Corporation

Enclosures (2 sets):

Marsh Landing Generating Station, Responses to Data Request Set 1 (#1-54)  
Air Quality Modeling Files in Response to Data Requests 7, 8 and 9 (on CD)

cc (without enclosures): Mike Monasmith, California Energy Commission  
Jon Sacks, Mirant Corporation  
Ron Kino, Mirant  
Lisa Cottle, Winston and Strawn  
Anne Connell, URS

## ATTACHMENT 1

-----Forwarded by Julie Mitchell/SanDiego/URSCorp on 02/05/2008 02:58PM -----

To: Julie\_Mitchell@URSCorp.com  
From: John\_Notar@nps.gov  
Date: 02/01/2008 04:45PM  
cc: John\_Bunyak@nps.gov, Dee\_Morse@nps.gov, Don\_Shepherd@nps.gov, John\_D\_Ray@nps.gov, John\_Notar@nps.gov  
Subject: Re: Contra Costa New Generation Project

Julie Mitchell: The National Park Service Air Resources Division has reviewed the information you provided below regarding the proposed Contra Costa Generation Project which is proposing to locate some 82 kilometers east of the Point Reyes National Seashore, a Class I area administered by the National Park Service. Due to the low amount of proposed emissions and the distance to Point Reyes National Seashore, the National Park Service does not request that a Class I increment analysis and an Air Quality Related Values analysis be performed for the Contra Costa Generation Project's PSD permit. Please forward this e-mail to the permitting agency for their notification. The permitting agency may contact the National Park Service Air Resources Division if it has any questions on this issue.

Thank You  
John Notar

John Notar  
National Park Service  
Air Resources Division  
12795 W. Alameda Pkwy.  
Lakewood, CO 80228  
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E-Mail: john\_notar@nps.gov

Julie\_Mitchell@UR  
SCorp.com

01/28/2008 10:44  
AM PST

john\_notar@nps.gov

To

cc

Subject

Contra Costa New Generation Project

John,

Here is some more information about the Project that I discussed in the phone message I left you.

The proposed Contra Costa New Generation Project will consist of 4 new natural gas-fired turbines to be constructed wholly within the existing Contra Costa Power Plant site in the town of Antioch, CA. The Project consists of four power blocks: 1) two Siemens Flex