

DOCKETED

Docket Number:	01-AFC-25C
Project Title:	Malburg City of Vernon-Compliance
TN #:	201550
Document Title:	Daniel Dunlap Comments: Comments Re: Staff Analysis
Description:	N/A
Filer:	System
Organization:	Daniel Dunlap
Submitter Role:	Applicant Representative
Submission Date:	1/13/2014 2:27:58 PM
Docketed Date:	1/13/2014

Comment Received From: Daniel Dunlap

Submitted On: 1/13/2014

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Comments Re: Staff Analysis

1. Under "Project Location and Description" on Page 1 of the Staff Analysis, the address of the project is listed as 2715 E. 50th St. The correct address for the Malburg Generating Station is 4963 Soto Street.
2. On Page 8 of the Staff Analysis, the sentence "In addition, Bicent is requesting to extend the startup time and to define emissions limits for NOx and CO during the startup periods." is partially in error. Bicent did not request that CEC Staff define emissions limits for NOx and CO during the startup periods. This was Staff initiated.
3. On Page 10 of the Staff Analysis, the sentences "The owner requested the SCAQMD to consider changing the definition for cold starts to be reduced from 72 hours offline to 48 hours offline because the owner says that the equipment is just as cold at 48 hours as it is at 72 hours. This change was proposed so the plant could be run in a peaking mode, if needed. (The plant generally operates as a base-load facility)" are only partially accurate. The first sentence is accurate, as is the sentence in parenthesis. However, the second sentence "This change was proposed so the plant could be run in a peaking mode, if needed." is not accurate. The change was simply Bicent's effort to accurately define the term "Cold Startup" and was unrelated to modes of operation.
4. On Page 11 of the Staff Analysis, the sentence "Transfer of ownership of MGS from the City of Vernon to Colorado Energy Management, an affiliate of Bicent, was approved by the Energy Commission on May 21, 2008." is in error. Transfer of ownership was from the City of Vernon to Bicent (California) Malburg LLC, not Colorado Energy Management. Colorado Energy Management is the operator of the facility and is representing the owner in these proceedings.
5. On Page 22 of the Staff Analysis, in the Verification for Condition of Certification AQ-6, the sentence "The City of Vernon shall report to the CPM for approval all emissions, fuel use and emission calculations during the commissioning period on a monthly basis as part of the monthly compliance report." should also be struck out, as the commissioning period has expired.
6. As Staff is using this modification proceeding as an opportunity to change the phrase "City of Vernon" to "plant owner" in all Air Quality related Conditions of Certification and Verifications, Bicent recommends staff be directed to make similar changes to all other Conditions of Certification and Verifications for consistency.