

DOCKETED

Docket Number:	15-AFC-01
Project Title:	Puente Power Project
TN #:	206067
Document Title:	Report of Conversation - Ventura County APCD Engineering Division
Description:	Report of Conversation on 9-3-15 between CEC Air Quality Staff and Ventura County Air Pollution Control District
Filer:	Jon Hilliard
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	9/11/2015 11:58:28 AM
Docketed Date:	9/11/2015



***Siting, Transmission
 and Environmental
 Protection Division***

FILE: Puente ROC Air District and
 AQ Staff

PROJECT TITLE: Puente Power Project (P3) **Docket:** 15-AFC-01

TECHNICAL AREA(S): Air Quality			
<input checked="" type="checkbox"/> Telephone		<input type="checkbox"/> Meeting Location:	
NAME: Jacquelyn Record	DATE: 9-3-15	TIME: 4:00pm	
WITH: Ventura County APCD Engineering Division Manager Kerby E. Zozula			
SUBJECT: Puente Power Project			

COMMENTS:

I spoke with the Ventura County APCD Engineering Division Manager Kerby E. Zozula on September 3, 2015. Mr. Zozula mentioned in our phone call that he believes the applicability of federal Prevention of Significant Deterioration (PSD) requirements to the Puente Power Project will be an issue. His concerns include that the PM2.5 netted value for the project is around 9.8 tons per year (project emissions minus a credit for shutting down Mandalay 1 and 2), while the PM2.5 threshold for PSD applicability is 10 tons per year. The PM2.5 emissions from Mandalay 1 and 2 are based on emission factors and not source tests. In addition, there is an unanswered PSD applicability question related to the fact that when Mandalay 1 and 2 are retired, the total facility permitted emissions for all pollutants will fall below the PSD major source threshold of 100 tons per year.

Mr. Zozula stated that he previously requested, and continues to recommend that the applicant to submit a PSD applicability determination to the U.S. Environmental Protection Agency (U.S. EPA), which has jurisdiction for PSD. Since PSD has not been delegated to Ventura County, this review is conducted by the U.S. EPA and is not a part of the Determination of Compliance (DOC) prepared by the local district and included in the Energy Commission staff analysis. Both the DOC and the Energy Commission staff analyses of the project will discuss the PSD issue; a clear determination from the U.S. EPA would be helpful. However, the federal PSD permit is outside the scope of both documents and both agencies; the question of a federal PSD permit would be a timing issue for the applicant.

Energy Commission staff agree with Mr. Zozula's recommendation to the applicant to have them to submit a PSD applicability determination to the U.S. EPA. We believe this approach is in the best interest of all parties.

cc:	Date: 9/11/15	Signed:
		Name: Jacquelyn Record