

Energy - Docket Optical System

From: Trudy Douglass [trudydouglass@att.net]
Sent: Thursday, March 14, 2013 7:08 PM
To: Worl, Robert@Energy; Energy - Public Adviser's Office
Subject: Prevention of Significant Deterioration 2011 post

California Energy Commission

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To: CEC

From: Trudy Douglass

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Please let me know if the CEC will be commenting on the SJAPCD's Preliminary Determination of Compliance. Is the following information germane to the accuracy of that document?

In reading the newly adopted rule 2410 for Prevention of Significant Deterioration, 2011, I found only one statement that pertains to choosing a monitor for a project. It reads: Background from certain air monitoring sites can be considered more conservative since they are in areas with higher concentration levels. It does not say the monitor closest to the site. In preparing the Preliminary Determination of Compliance for HECA the District choose Shafter with its incomplete data of air quality in the Valley rather than the truer picture in Arvin-Edison. This lowered HECA's mitigation total and the number of Clean-air Credits they have to buy. It also makes a lie of the District's claim that there are no health risks to Valley residents.

The rule also says that with baseline concentrations and the estimated emissions, a model for projecting the impact on the area can be attained. The District said that after HECA has been in operation a year they will do an acid rain assessment.