

June 24, 2009

<b>DOCKET</b>	
<b>07-AFC-5</b>	
DATE	<u>JUN 24 2009</u>
RECD.	<u>JUN 24 2009</u>



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Mr. Sam Oktay  
Mojave Desert Air Quality Management District  
14306 Park Avenue  
Victorville, CA 92392-2310

Subject: Revisions to the FDOC for Ivanpah SEGS Project

Dear Mr. Oktay:

On December 3, 2008, the District issued the Final Determination of Compliance (FDOC) for the Ivanpah SEGS project. On behalf of the applicant, BrightSource Energy, Inc., we are requesting revisions to permit conditions contained in the FDOC.

The boilers at Ivanpah SEGS are not designed to sustain power generation. Instead, they are intended for the limited purposes of maintaining system temperatures during periods of transient cloud cover, and bringing the system up to operating temperature at the beginning of the day. The limited operation of the boiler is reflected in MDAQMD permit condition 11, which limits the boilers to 4 hours of operation per day.

Before a unit can be operated commercially, however, the associated boilers must be commissioned. Steam blows will be required to clean out contaminants from the boiler tubes. The gas boiler's combustion system must be tuned and tested. Steam from the gas-fired boilers will also be needed to provide steam for steam blows to clean out contaminants from the tubes in the solar boiler. During the commissioning process, the boilers may need to be fired for as much as 24 hours per day. Once commissioning is over, the unit will be able to operate in accordance with the 4-hour daily limit.

We request that the following changes be made to the FDOC in order to correct the emissions.

CONDITIONS APPLICABLE TO IVANPAH 1 & 2 (Two - 2) BOILERS, MDAQMD APPLICATION NUMBERS; 00009311 & 00009314, each consisting of:

...

5. Not later than ~~90~~ 180 days after initial startup, the operator shall perform an initial compliance test on this boiler in accordance with the District Compliance Test Procedural Manual. This test shall demonstrate that this equipment does not exceed the following emission maximums:

...

11. This boiler shall not operate more than 4 hours in any single day, and no more than 1460 hours in any calendar year.
  - a. These limits shall not apply during the facility commissioning period. The commissioning period shall begin the first time fuel is fired in the boiler. The commissioning period shall end when the facility achieves commercial operation, but no later than 180 days after first fire.

CONDITIONS APPLICABLE TO IVANPAH 3 BOILER, MDAQMD APPLICATION NUMBER; 00009320, consisting of:

...

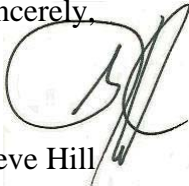
5. Not later than ~~90~~ 180 days after initial startup, the operator shall perform an initial compliance test on this boiler in accordance with the District Compliance Test Procedural Manual. This test shall demonstrate that this equipment does not exceed the following emission maximums:

...

11. This boiler shall not operate more than 4 hours in any single day, and no more than 1460 hours in any calendar year.
  - a. These limits shall not apply during the facility commissioning period. The commissioning period shall begin the first time fuel is fired in the boiler. The commissioning period shall end when the facility achieves commercial operation, but no later than 180 days after first fire.

Please feel free to contact me if you have any questions.

Sincerely,



Steve Hill

cc: Steve De Young  
Director, Environmental, Safety and Health  
BrightSource Energy  
1999 Harrison Street, Ste. 2150  
Oakland, CA 94612

CEC Docket 07-AFC-5



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – WWW.ENERGY.CA.GOV**

APPLICATION FOR CERTIFICATION  
FOR THE *IVANPAH SOLAR ELECTRIC  
GENERATING SYSTEM*

DOCKET No. 07-AFC-5

PROOF OF SERVICE  
(Revised 6/24/09)

**APPLICANT**

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DECLARATION OF SERVICE

I, John L. Carrier, declare that on June 24, 2009, I served and filed copies of the attached Letter to MDAQMD requesting revisions to the FDOC, dated June 24, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [[www.energy.ca.gov/sitingcases/ivanpah](http://www.energy.ca.gov/sitingcases/ivanpah)]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

*(Check all that Apply)*

FOR SERVICE TO ALL OTHER PARTIES:

  x   sent electronically to all email addresses on the Proof of Service list;

  x   by personal delivery or by depositing in the United States mail\* at Sacramento, CA with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

FOR FILING WITH THE ENERGY COMMISSION:

  x   sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (*preferred method*);

**OR**

       depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. \_\_\_\_\_  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.



\_\_\_\_\_  
John L. Carrier, J.D.

\*or by other delivery service: e.g., Fed Ex, UPS, courier, etc.