



Air Pollution Control Board

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October 3, 2007

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DOCKET 07-SPPE-2	
DATE	OCT 03 2007
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APPLICATION STATUS

The San Diego Air Pollution Control District (District) has reviewed Application No. 985708, 985709, 985710 and 985711 for an Authority to Construct /Permit to Operate a peaking electric power generation plant consisting of two natural gas fired simple cycled combustion turbines, one natural gas fueled emergency black start engine, and one diesel fueled emergency fire pump engine, to be located at 10300 Pala Road, Pala, CA 92059. The application has been determined incomplete at this time. The following are additional information to be submitted to the District for the application to be determined complete, and comments on the submitted applications:

1. Analysis on why combined cycle combustion turbines are not proposed for the project.
2. Combustion turbine emission factors for cold ambient temperature.
3. Combustion turbine fuel flow rates, exhaust flow rates, stack outlet temperatures and oxygen concentrations at stack temperature for startup and steady state operations at cold and average ambient temperature.
4. Detailed turbines commissioning operations and emissions, including all the commissioning modes and their corresponding operating hours and emission factors in lbs/hour and lbs/day.
5. Manufacturer specification data sheets and exhaust emission data sheets for the emergency black start engine and the emergency fire pump engines.
6. Based on the general information on Estimated Commissioning Emissions submitted with the application, Air Quality Impact Analysis (AQIA) requirements are triggered by the estimated NOx and CO hourly and daily emissions. AQIA submittal is required accordingly.
7. Comments on the health risk assessment due to emissions of non-criteria pollutants are as follows:
 - a. The applicant has submitted limited computer reports for District review. In order for the District to verify the HRA calculations, it is necessary for the applicant to submit all of the HARP input and intermediate files, especially the HARP database containing the facility data or a HARP Transaction file containing the facility data, neither of which were submitted. Among the

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intermediate files should be the *.src files, the *.x0q files (which were submitted), and the *.ems file(s). The *.ems file containing emissions data was not submitted.

- b. Further specific guidance can be found in the District Supplemental Guidelines for AB25488 HRAs, which should be followed for Rule 1200 as well, and which is available on the District web site. HRAs should also follow the OEHHA HRA guidelines available on the OEHHA web site.
- c. The District did not find a facility diagram showing the exact location of all sources and significant structures on the facility site, at least in the documentation available.
- d. Although the District is persuaded by the argument for using ISC modeling with the HARP risk calculations, if a comparison with AERMOD results is important there is an OEHHA-approved method for using HARP to generate source strengths to use as emission rates in AERMOD. The applicant should consult the OEHHA guidelines (Vol. 5) or contact the District for further details.
- e. The Meteorology section may prefer using 2 years of Gregory Canyon meteorology data to 3 years of Escondido data since it may be more representative of local conditions.
- f. The facility should justify the use of CATEF 1996 emission factors instead of more recent or District/EPA emission factors. The values cited do not appear to be the same as those available on the internet for the year 2000. There appear to be errors in the tables for emissions provided in the HRA report. Turbine and diesel engine emissions seem to be calculated incorrectly.
- g. The HRA appears to ignore hourly emissions from the fire pump diesel engine. District procedure is to use emission factors from Ventura County for non-particulate TACs that have health values. These emission factors are cited on the District web site (<http://www.aqmd.gov/prdas/pdf/COMBEM2001.pdf>).

Please submit the requested information within 30 days. If there is any question regarding these comments, please contact the undersigned at (858) 586-2747.

Sincerely,


CAMQUI NGUYEN
Associate Air Pollution Control Engineer

I.D.#: 16 11328A

Cc: Docket Unit, California Energy Commission
Charles Diep, TRC Solutions
San Diego APCD Compliance Division