



DOCKET 11-AFC-1
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May 29, 2012

MELISSA A. FOSTER
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VIA HAND DELIVERY

Mr. Eric Solorio, Siting Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Re: Pio Pico Energy Center Project (11-AFC-01)
Applicant's Additional Information to EPA re PSD Permit Application**

Dear Mr. Solorio:

On behalf of Applicant Pio Pico Energy Center, LLC, please find enclosed herein for docketing additional information submitted to the U.S. Environmental Protection Agency Region 9 ("EPA") related to Applicant's PSD Permit Application for the Pio Pico Energy Center Project. Please note that due to the voluminous nature of the information submitted, such data is provided on a single external hard drive.

Should you have any questions regarding this submittal, please contact me directly.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Melissa A. Foster".

Melissa A. Foster

MAF:jmw

Enclosure

cc: Proof of Service List (without enclosure)



**sierra
research**

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May 23, 2012

Mr. Gerardo Rios
Chief, Permits Office
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Pío Pico Energy Center PSD Permit Application
Alternative Modeling Analysis (Donovan NO₂/NO_x ratio)

Dear Mr. Rios:

As requested by EPA in an email message from Shirley Rivera to Steve Hill, dated May 11, 2012, we are providing the results of an alternative modeling evaluation that uses an in-stack NO₂/NO_x ratio of 0.56 for Donovan Detention Center. The modeling previously submitted was based on the in-stack NO₂/NO_x ratio of 0.1 that was recommended by the San Diego APCD for use in their evaluation of the project.

Applicant understands that this alternative analysis is a merely a sensitivity analysis to demonstrate that the value selected for this stack parameter does not affect the relevant conclusion of the air quality impact analysis: the project will not cause or contribute to a violation of the 1-hour NO₂ National Ambient Air Quality Standard (NAAQS).

All other stack parameters for all other sources were unchanged from the values in the modeling previously submitted. As before, meteorological data and regional ambient background values from 2004 through 2008 were used in this analysis.

The applicant has conducted the requested modeling and evaluated the potential cumulative impact of the project, nearby sources, and regional background concentrations on hourly NO₂ concentrations. The synthetic background data used to demonstrate compliance with the federal 1-hour NO₂ NAAQS are the same used in the previously submitted demonstration.

The highest 5-year average of 98th percentile maximum daily 1-hour NO₂ concentrations was 179.4 µg/m³, which complies with the standard of 188 µg/m³. This is the same value as previously determined using an in-stack NO₂/NO_x ratio of 0.1 for Donovan Detention Center. The change in the Donovan NO₂/NO_x does not affect the concentration at the point of maximum impact; nor does it result in impacts elsewhere that are high enough to supplant the point of maximum impact.


The calculations at the critical receptor are summarized in Table 1.

Modeling files are included in the attached electronic files.

Table 1 One-hour NO₂ NAAQS Compliance Calculation (Receptor 8164^a)						
Year	2004	2005	2006	2007	2008	5-year Average
Date	March 7	Oct. 19	Dec. 14	March 23	Oct. 14	
Hour	21	3	18	23	19	
Cumulative Impact (µg/m ³)	175.5	170.5	193.9	172.9	184.4	179.4
Regional Background (µg/m ³)	125.9	79.0	107.1	101.5	110.9	
Project Impact (µg/m ³)	37.4	62.1	67.0	20.0	36.6	

a . Receptor with the highest 5-year average 98th percentile of the daily maximum 1-hour cumulative impact (monitor data plus modeled impact from project and non-project nearby sources).

Sincerely,



Steve Hill

Attachments

cc: John McKinsey, Stoel Rives LLP
 David Jenkins, Apex Power Group
 Steve Moore, SDAPCD

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
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APPLICATION FOR CERTIFICATION
FOR THE *PIO PICO ENERGY CENTER, LLC*

Docket No. 11-AFC-1
PROOF OF SERVICE
(Revised 3/20/12)

Pio Pico Energy Center, LLC

**Letter to E. Solorio dated May 29, 2012 re Applicant's Additional Information
to United States Environmental Protection Agency Region 9
Regarding PSD Permit Application**

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DECLARATION OF SERVICE

I, Judith M. Warmuth, declare that on May 29, 2012:

I deposited copies of the aforementioned document and, if applicable, a disc containing the aforementioned document in the United States mail at 500 Capitol Mall, Suite 1600, Sacramento, California 95814, with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list herein and consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210.

OR

I transmitted the document(s) herein via electronic mail only pursuant to California Energy Commission Standing Order re Proceedings and Confidentiality Applications dated November 30, 2011. All electronic copies were sent to all those identified on the Proof of Service list herein and consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210.

OR

On the date written above, I placed a copy of the attached document(s) in a sealed envelope, with delivery fees paid or provided for, and arranged for it/them to be delivered by messenger that same day to the office of the addressee, as identified on the Proof of Service list herein and consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.



Judith M. Warmuth