

DOCKET

11-AFC-3

DATE MAY 14 2012

RECD MAY 15 2012

May 14, 2012

Mr. Eric Solorio
California Energy Commission
Docket No. 11-AFC-3
1516 9th St.
Sacramento, CA 95814

RE: Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-3: Objection to Quail Brush Genco, LLC's letter (May 1, 2012) "requesting a minor change to the method for calculating the permit limits.

Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulation, Intervenors Roslind Varghese, Kevin Brewster, and Rudy Reyes hereby submit our letter of objection to Quail Brush Genco, LLC's letter regarding their request for a change to the method for calculating the permit limits for the Wartsila Power Cycle Engines.

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

Sincerely,



Roslind Varghese
roslindv@gmail.com

May 14, 2012

Mahmood Hossain, Chief
Air Pollution Control
San Diego Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131

Mr. John Annicchiarico
Supervisor, Engineering, San Diego APCD

Mr. Arthur Carbonnel
APCD Engineer, San Diego APCD

Mr. Joseph Hughes, Air Resources Engineer
California Energy Commission
1516 Ninth Street, MSM40
Sacramento, CA. 95814

Mr. Geoffrey Glass, Environmental Engineer
Environmental Protection Agency, Region 9
Air Division, Permits Office
75 Hawthorne Street (AIRM3)
San Francisco, CA 94105

RE: Objection to Quail Brush Genco, LLC's letter (May 1, 2012) "requesting a minor change to the method for calculating the permit limits."

Dear Gentlemen:

On behalf of the impacted communities of San Carlos, Del Cerro, Allied Gardens, Tierrasanta, Santee, Lakeside, El Cajon, and Alpine, citizen intervenors Kevin Brewster, Rudy Reyes, and I submit our strong objection to the letter from C. Richard Neff, Quail Brush Genco, LLC's VP of Environment, Health & Safety, who requested two important changes to tracking compliance in the applicant's permit limit for the Wartsila power cycle engines. The applicant has asked that the draft and final facility permit be modified to be based on total mass emissions rather than annual hours of operation. They are requesting that no limits on annual hours be placed in the draft or final permit for each engine or for the facility in total. They are also asking for a deletion of the annual fuel use limit on each engine and are asking for a total fuel limit based on the collective 11 engines.

If the permit is not based on hours of operation, it will be in total contradiction to the applicant's explanations to the public on various occasions in response to heightened concerns that they will increase their operation hours substantially over time. The applicant has repeatedly said that their permit will be based on a maximum of 3800 hours of operation and that there will be systems in place to prevent them from going beyond those stated limits. The grave concern of the public is that the plant will move from operating 43% of the time to that approaching 80-100 percent. This move to change the permit is one of many steps to slide the time limit to something other than 43%.

Their stated Executive Summary in the Application for Certification (AFC) to the CEC states under item 1.2 Project Overview, "The proposed Quail Brush Generation Project (Project) will be a nominal 100-megawatt (MW) intermediate/peaking load facility operating up to **3,800 hours per year** using natural gas-fired reciprocating engine technology."

Their detailed description in that APC under item 2.3.14 Generation Plant Operation says, "Because the high efficiency of the 20V34SG engines, the plant's flat, high efficiency profile across its load range, and because of the support this plant will provide both to SDG&E's local 230kV transmission systems, it is anticipated that the Project may be dispatched up to **3,800 hours/year** excluding start-ups."

The move from an hourly to emission limit creates greater flexibility for the applicant at the expense of the community's welfare. With the standard permit restricting annual hours and fuel use limits per engine, the result would be to effectively force the operator to stay below the overall emission cap and require each engine to meet the limits individually. With the applicant's requested revised general emissions cap, the operator can delay maintenance because they can compensate engines exceeding their limits with engines that are better, as the permit would only require that engines meet the limits on average.

The Wartsila gas engines selected have much higher emission levels as far as nitrogen oxides, ammonia carry over, formaldehydes, and volatile organic compounds than other fossil fuel based power generation technologies. This applies not only to normal operation, but in particular to the frequent starts and shutdowns of such a power plant. The concern regarding the applicant's request to change to a general emissions cap is that we understand that emission levels of the engine during start up, shut down, and transient operations are not regulated. While this would normally not be a concern for power plants, in this specific situation, due to the frequent starts and stops that are the nature of peaker plants and especially since the proposed location is in close proximity to Mission Trails Regional Park, residential areas, and schools, this information needs to be considered in the planning and permitting process.

Of serious concern to the community are emissions of poisonous ammonia and cancer causing formaldehyde during starts. The numbers in the project documents look reasonably credible for new equipment of this type. But what is the commitment of the operator for emission levels over the life of the project, especially when the engine is near its overhaul (about once a year)? We are told to expect that SOx from lube oil would go up, as well as ammonia carryover. The applicant states a steady state level of 10ppm of ammonia carryover (which is realistic for this type of system) with a new and clean catalyst. Since the engine introduces sulfur into the exhaust stream, the catalyst will get contaminated and lose its effectiveness over time. It is also difficult to keep NOx and ammonia levels in check during start and transient operations. Hence, we object to the change requested and urge the ACPD to keep the permit to the annual hourly and fuel use per engine rather than a general emissions cap for all the engines. This request is made in order for the ACPD and EPA to provide the protections necessary to the communities who comprise the developing bodies and minds of school children learning, playing, and exploring in the park less than half a mile away.

On behalf of the impacted communities, we thank you for your serious consideration of our request.

With gratitude,



Roslind Varghese
Citizen intervenor
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On behalf of the following citizen intervenors representing the impacted communities of San Carlos, Del Cerro, Allied Gardens, Tierrasanta, Santee, Lakeside, El Cajon, and Alpine:

Kevin Brewster
Rudy Reyes

