



California Energy Commission

DOCKETED
12-AFC-2

TN # 67317

SEP 26 2012

September 20, 2012

AES Huntington Beach
21730 Newland Street
Huntington Beach, CA 92646
tel 562 493 7891
fax 562 493 7320

Mr. Brian Yeh
Senior Manager, Mechanical, Chemical, and Public Services Team
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

RE: Huntington Beach Energy Project Permit Application (Facility ID# 115389)

Dear Mr. Yeh:

AES Huntington Beach, LLC (AES-HB) is submitting this letter in response to the South Coast Air Quality Management District's (AQMD) July 24, 2012 request for additional information needed to complete the engineering evaluation of the Huntington Beach Energy Project (HBEP). The additional information requested includes:

- 1) Vendor guarantees for the selective catalyst reduction (SCR), oxidation catalyst (OxCat), and particulate matter with an aerodynamic diameter of 10 microns or less (PM10) emission rates;
- 2) Submittal of a greenhouse gas Prevention of Significant Deterioration (PSD) permit application to EPA;
- 3) Offsets for particulate matter with an aerodynamic diameter of 2.5 microns or less (PM2.5) consistent with Rule 1325 or a proposed enforceable operating condition to reduce the PM2.5 potential to emit of less than the 100 ton per year (TPY) major source threshold;
- 4) Submittal of a detailed decommissioning plan for AES's Huntington Beach Generating Station (HBGS) Boilers 1 and 2 and Redondo Beach Generating Station (RBGS) Boilers 6 and 8.

The remainder of this letter presents AES-HB responses to the requested information.

1) Vendor Guarantees

Attached as Exhibit 1 are HBEP vendor guarantees (in parts per million by volume dry at 15 percent oxygen for NOx, CO, and VOC) for the HBEP at three ambient conditions for gas turbine operation between 70 percent to 100 percent load rate. Exhibit 1 also includes guaranteed emission rates (in pounds per million British thermal units) for the duct burners and the expected catalyst life for both the SCR and the OxCat.

Exhibit 2 presents the turbine vendor's, (Mitsubishi Power Systems America, Inc.), emission guarantee for the PM10. The vendor guaranteed PM10 (and PM2.5) emission rate of 4 pounds per hour includes both filterable and condensable fractions of PM10 based on Environmental Protection Agency Reference Methods 201/201A and 202 (dry). However, the guaranteed PM10 emission rate does not include any contribution from fuel-bound sulfur (see Conditions 2 and 4 of the guarantee). AES-HB increased the MSPA

PM10 guarantee by 0.5 pounds per hour to account for fuel bound sulfur based on an expected fuel sulfur content of 0.18 grains of total sulfur per 100 cubic feet of natural gas and a 10 percent sulfur dioxide to sulfur trioxide conversion rate. The turbine PM10 (and PM2.5) emission rate used in the HBEP permit application is 4.5 pounds per hour irrespective of load rate or fuel consumption rate.

2) Greenhouse Gas PSD permit

Exhibit 3 presents the cover letter for the HBEP Greenhouse Gas Permit application which was submitted to EPA Region 9 on September 19, 2012.

3) Rule 1325 PM2.5 Compliance Demonstration

The AQMD has requested AES-HB to provide PM2.5 offsets or propose an enforceable operating condition to reduce the PM2.5 potential to emit below the major source threshold of 100 tons per year. AES-HB has determined an operating profile that reduces HBEP's PM2.5 emissions below the major source threshold. Tables 1 and 2 present a revised annual operating profile and annual emission estimates on a per turbine and facility basis. The reduction in PM2.5 emissions resulted from a revised operating profile of 5,900 unfired turbine hours, 470 fired turbine hours, and 624 start ups and shutdowns per year.

Table 1 HBEP Revised Annual Operating Profile

HBEP Operating Profile	Events	Hours
Annual Unfired Hours (i.e., no duct burner firing)	–	5900
Annual Fired Hours (i.e., with duct burner firing)	–	470
Annual Cold Starts	24	36.0
Annual Warm Starts	150	81.3
Annual Hot Starts	450	243.8
Annual Shutdowns	624	104
Total Annual Startup/Shutdown Hours (per turbine)	–	465
Total Annual Op Hours (per turbine)	–	6,835

Table 2 HBEP Revised Annual Air Emissions

Annual Emissions	1 Turbine (Tons)	Facility (Tons)
NOx	40.4	242.3
CO	46.2	277.0
VOC	21.8	130.7
SO2	2.16	12.9
PM10	16.6	99.3
PM2.5	16.6	99.3
GHG	523,528	3,141,167

AES-HB proposes the following enforceable operating condition to reduce the PM2.5 PTE to below the major source threshold.

The project owner/operator shall not produce emissions of PM2.5 from the proposed project that exceed 99.9 tons in any 12-month period, determined monthly based on total emissions over the previous 12-month period.

AES-HB modeled the proposed enforceable condition based on AQMD-issued permit conditions used to limit annual NOx potential to emit levels necessary to comply with PSD applicability requirements.

4) AES Huntington Beach Boilers 1 and 2 and AES Redondo Beach Boilers 6 and 8
Decommissioning Plan

AES-HB will submit a retirement plan to the AQMD for AES Huntington Beach Boilers 1 and 2 and AES Redondo Beach Boilers 6 and 8 to demonstrate compliance with Rule 1304(a)(2), subsequent to the approval of the HBEP license by the California Energy Commission (CEC) and prior to the issuance of a Permit to Construct from the SCAQMD. At this time AES-HB is unable to definitively state the date of commercial operation of the HBEP. The commercial operation date of the HBEP will affect the transmission interconnections at the Huntington Beach Generating Station and may also impact the schedule of boiler retirements at the Redondo Beach Generating Station. Furthermore, the CEC may require specific actions in relation to the decommissioning and demolition of AES Huntington Beach Boilers 1 and 2 and/or AES Redondo Beach Boilers 6 and 8. For these reasons, AES-HB is unable to prepare and submit a retirement plan at this time and will commit to providing a plan in compliance with Rule 1304(a)(2) subsequent to the approval of the Huntington Beach Energy Project (HBEP) license by the CEC and prior to the issuance of a Permit to Construct from the AQMD. AES-HB believes that the actual retirement plans for these units should not be required in order to complete the preliminary or final determination of compliance for HBEP.

If you require further information, please don't hesitate contacting me at 562-493-7840.

Sincerely,



Stephen O'Kane
Manager
AES Huntington Beach, LLC

Attachments

cc: Robert Mason/CH2M HILL
Jennifer Didlo/AES
John McKinsey/Stoel Rives
Missy Foster/Stoel Rives
Jerry Salamy/CH2M HILL
Felicia Miller/CEC

**Exhibit 1 – Huntington Beach Energy Project Vendor Air
Emission Guarantee**



August 10, 2012

Horacio Larios
Power Engineers Collaborative, LLC
600 West Jackson Blvd, Suite 600
Chicago, IL 60661

Subject: HRSB Proposal - Emissions Guarantees
Huntington Beach Energy Project
VPI Proposal P-1061

Dear Mr. Larios:

With regard to our proposal for the HRSGs and associated equipment for the above referenced project, this is to confirm that with the equipment proposed VPI will provide the following emissions guarantees

1. Given the attached M501DA Gas Turbine (GT) Expected Performance & Emissions provided by Mitsubishi Power Systems Americas, Inc. at the following conditions:

32°F, 87.5% Relative Humidity, 100% GT Load through 70% GT Load,
65.8°F, 57.7% Relative Humidity, 100% GT Load through 70% GT Load, and
110°F, 8% Relative Humidity, 100% GT Load through 70% GT Load;

and with 450 MMBtu/hr (LHV) Duct Burner heat input at the GT 100% load cases

Stack Emissions associated with each Gas Turbine – Heat Recovery Steam Generator for these conditions are as follows:

	ppmvd@15%O ₂
CO	2
VOC	1
NO _x	2

The CO and SCR catalysts are guaranteed to meet these emission limits for 24,000 hours of operation or three years after initial exhaust flow into the catalysts, whichever occurs first.



2. The Duct Burner's emissions contribution factored into the above stack guarantees are as follows:

	Lbs/MMBtu (HHV)
NO _x as NO ₂	0.08
CO	0.05
VOC as CH ₄	0.01
PM 10	0.01

Notes:

1. Emission levels given above in lbs/MMBtu (HHV) are guaranteed from 50% to 100% maximum designed heat release of the duct burner system, with all burner runners in operation. For reduced burner loads from 10% to 50% of maximum design heat release with all burner runners in operation, the emissions levels can be higher than those given on a lbs/MM Btu (HHV), but at no point will the burner emissions exceed the mass flow rates on a Lbs/hr bases.
2. For reduced burner loads from 10% to 50% of maximum design heat release, emissions levels given in lbs/MMBtu (HHV) are guaranteed levels when the burner runners are removed from operation (staged) to achieve turndown.
3. VOC's guarantee are non-methane / non-ethane described as methane.
4. PM-10 guarantee is front and rear half, excludes all inorganic contribution and sulfur/sulfide compounds.

Please do not hesitate to contact me if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Patrick K. Sims", with a horizontal line extending to the right.

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Attachments

1. GT Exhaust Outlet Conditions



Attachment 1: GT Exhaust Outlet Conditions

M501DA Gas Turbine Expected Performance & Emissions

The information contained herein is the proprietary and confidential information of Mitsubishi Power Systems America, Inc. (MPSA). Neither this document nor any information obtained there from may be reproduced, disclosed or transmitted to any unauthorized person without prior written consent of MPSA.

Engine Type		M501DA	M501DA	M501DA	M501DA	M501DA	M501DA	M501DA	M501DA
Fuel Type		Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas
GT Load Condition	%	100%	90%	80%	70%	100%	100%	90%	80%
Ambient Temp.	Deg F.	32	32	32	32	110	110	110	110
Ambient Press.	psia	14.68	14.68	14.68	14.68	14.68	14.68	14.68	14.68
Relative Humidity	%	87.5	87.5	87.5	87.5	8.0	8.0	8.0	8.0
Evaporative Cooler	On/Off	OFF	OFF	OFF	OFF	ON	OFF	OFF	OFF
Fuel LHV	Btu/lb	20,648	20,648	20,648	20,648	20,648	20,648	20,648	20,648
GT Gross Output	kW	131,800	118,600	105,400	92,200	118,000	100,100	90,100	80,100
GT Gross Heat Rate (LHV)	Btu/kWh	10,089	10,184	10,214	10,884	10,333	10,889	10,959	11,221
GT Exhaust Flow x 10 ³	lb/h	3,355.8	3,038.4	2,800.4	2,443.1	3,073.0	2,847.6	2,835.9	2,410.8
GT Exhaust Temp.	Deg F.	992	987	996	1,022	1,015	1,032	1,028	1,034
GT Exhaust Press Loss (total)	in. H ₂ O	18.4	15.1	11.9	10.1	15.7	13.7	11.6	9.7
GT Exhaust Composition:									
O ₂	% wt.	15.35	15.40	15.36	15.31	15.28	15.73	15.82	15.88
CO ₂	% wt.	5.12	5.09	5.10	5.14	5.04	4.85	4.79	4.77
H ₂ O	% wt.	4.42	4.40	4.41	4.44	5.27	4.31	4.27	4.25
N ₂	% wt.	73.79	73.79	73.81	73.79	73.12	73.79	73.80	73.80
Ar	% wt.	1.32	1.32	1.32	1.32	1.31	1.32	1.32	1.32

GT EMISSIONS

NO _x	ppmvd @ 15% O ₂	9	9	9	9	9	9	9	9
CO	ppmvd @ 15% O ₂	10	10	10	10	10	10	10	10
UHC	ppmvd @ 15% O ₂	1	1	1	1	1	1	1	1
VOC	ppmvd @ 15% O ₂	1	1	1	1	1	1	1	1
PM ₁₀ /PM _{2.5} (front half)	mg/m ³ N	1	1	1	1	1	1	1	1

NOTES:

- All above data is based on New & Clean conditions. All supplied values are estimations and not guaranteed.
- Fuel characteristics are based on customer supplied fuel analysis. Sulfur and fuel bound nitrogen (FBN) in the fuel are assumed to be zero.
- A tolerance of 0.75% on Power, 1.0% on Heat Rate, 2% on exhaust flow, and 10°F on exhaust temperature shall apply.
- Particulate front-half emissions (non-condensables) shall be determined using EPA Method 201 or 201A.
- The definition of VOC is on a non-methane, non-ethane basis assuming equivalent molecular weight of methane. Measurement of VOC is based on that THC (Total Hydro Carbon) measured by EPA Method 25A except methane and ethane measured by EPA Method 18.



Attachment 1: GT Exhaust Outlet Conditions (continued)

M501DA Gas Turbine Expected Performance & Emissions

The information contained herein is the proprietary and confidential information of Mitsubishi Power Systems Americas, Inc. (MPSA). Neither this document nor any information obtained there from may be reproduced, disclosed or transmitted to any unauthorized person without prior written consent of MPSA.

		M501DA	M501DA	M501DA	M501DA	M501DA
		Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas
Engine Type		100%	100%	90%	80%	70%
Fuel Type		100%	100%	90%	80%	70%
GT Load Condition	%	100%	100%	90%	80%	70%
Ambient Temp.	Deg F.	65.8	65.8	65.8	65.8	65.8
Ambient Press.	psia	14.68	14.68	14.68	14.68	14.68
Relative Humidity	%	57.7	57.7	57.7	57.7	57.7
Evaporative Cooler	On/Off	ON	OFF	OFF	OFF	OFF
Fuel LHV	Btu/lb	20,648	20,648	20,648	20,648	20,648
GT Gross Output	kW	122,100	119,000	107,100	95,200	83,300
GT Gross Heat Rate (LHV)	Btu/kWh	10,199	10,235	10,528	10,755	11,020
GT Exhaust Flow x 10 ³	lb/h	3,179.2	3,132.3	2,907.2	2,652.6	2,338.4
GT Exhaust Temp.	Deg F.	1,009	1,012	1,010	1,016	1,044
GT Exhaust Press Loss (total)	in. H2O	16.7	16.3	13.9	11.5	9.3
GT Exhaust Composition:						
O2	% wt.	15.29	15.39	15.49	15.52	15.39
CO2	% wt.	5.07	5.03	4.96	4.95	5.03
H2O	% wt.	4.99	4.79	4.74	4.72	4.79
N2	% wt.	73.34	73.47	73.49	73.49	73.47
Ar	% wt.	1.31	1.32	1.32	1.32	1.32

GT EMISSIONS

		0	0	0	0	0
NOx	ppmvd @ 15% O2	0	0	0	0	0
CO	ppmvd @ 15% O2	10	10	10	10	10
UHC	ppmvd @ 15% O2	1	1	1	1	1
VOC	ppmvd @ 15% O2	1	1	1	1	1
PM10/PM2.5 (front half)	mg/m3N	1	1	1	1	1

NOTES:

1. All above data is based on New & Clean conditions. All supplied values are estimations and not guaranteed.
2. Fuel characteristics are based on customer supplied fuel analysis. Sulfur and fuel bound nitrogen (FBN) in the fuel are assumed to be zero.
3. A tolerance of 0.75% on Power, 1.0% on Heat Rate, 2% on exhaust flow, and 10°F on exhaust temperature shall apply.
4. Particulate front-half emissions (non-condensables) shall be determined using EPA Method 201 or 201A.
5. The definition of VOC is on a non-methane, non-ethane basis assuming equivalent molecular weight of methane. Measurement of VOC is based on that THC(Total Hydro Carbon) measured by EPA Method 25A except methane and ethane measured by EPA Method 18.

**Exhibit 2 – Huntington Beach Energy Project Turbine
Particulate Matter Emission Guarantee**

Particulate Emissions Guarantee for AES Southland:

PM10: 4 lb/hr

PM2.5: 4 lb/hr

Conditions of Guarantee:

1. Particulate emissions shall be the sum of non-condensable emissions determined using EPA Method 201 or 201A and condensable emissions determined using EPA Method 202 dry.
2. Fuel gas composition is as specified in the AES Southland RFQ dated June 20, 2011. No sulfur or fuel bound nitrogen is contained in the fuel gas supplied.
3. Fuel gas supplied is in accordance with MPSA's fuel gas specification.
4. Particulate emission values specified above are stated as the difference between the GT outlet particulate emissions as measured at the GT exhaust flange and the GT inlet particulate emissions as measured at the GT inlet filter house.
5. Particulate emission values specified above are valid for GT normal operation between 100% GT load and 75% GT load.
6. Evaporative cooler is not in service.

**Exhibit 3 – Huntington Beach Energy Project Prevention of
Significant Deterioration Permit Application Cover Letter**



September 19, 2012

AES Huntington Beach
21730 Newland Street
Huntington Beach, CA 92646
tel 562 493 7891
fax 562 493 7320

Ms. Deborah Jordan
Director, Air Division
United States Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

**RE: AES Huntington Beach Energy Project Application for Greenhouse Gas
Prevention of Significant Deterioration Pre-Construction Permit**

Dear Ms. Jordan:

AES Huntington Beach, LLC (AES-HB), a wholly owned subsidiary of AES Southland, LLC (AES), is submitting copies of the application materials for a Greenhouse Gas Prevention of Significant Deterioration (PSD) permit for the Huntington Beach Energy Project (HBEP).

HBEP is a natural gas-fired, combined-cycle electrical generating facility with a net output rating of 939 megawatts. The HBEP will replace and be constructed on the site of AES's Huntington Beach Generating Station (HBGS) located in the City of Huntington Beach, California. HBEP will consist of two power blocks, each composed of three natural gas combustion turbine generators with supplemental fired heat recovery steam generators, a steam turbine generator, an air-cooled condenser, and ancillary facilities.

This application is being submitted in conjunction with applications submitted to the South Coast Air Quality Management District (AQMD) and the California Energy Commission (CEC). The attached application is materially the same as the application submitted to the AQMD. However, during the CEC's data adequacy review, they noted deficiencies in the biological and cultural resources, transmission system engineering, and public health materials submitted, requiring additional information to be developed. The attached application incorporates these additional information items for the Application for Certification (AFC) to the CEC.

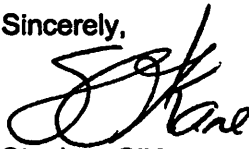
The HBEP is subject to preconstruction review under Title 40, Code of Federal Regulations, Part 52.21. As such, HBEP is subject to the Environmental Protection Agency (EPA) PSD "Tailoring Rule" for greenhouse gases. It is our understanding that EPA has proposed delegation of the Greenhouse Gas PSD authority to the AQMD on August 29, 2012, with delegation expected before the end of the year. However, the AQMD has requested that AES-HB also submit the Greenhouse Gas PSD permit application directly to EPA Region 9.

The contents of this application package include the following information from the CEC Application for Certification, which includes the Greenhouse Gas Best Available Control Technology discussion (Appendix 5.1D) and the completed AQMD authority to construct application forms (Appendix 5.1E):

- **Section 1.0: Executive summary**
- **Section 2.0: Project Description**
- **Section 5.1: Air Quality (includes Appendices 5.1A through 5.1F)**
- **Section 5.2: Biological Resources (section included to satisfy Endangered Species consultation requirements with the United State Fish and Wildlife Service)**
- **Section 5.3: Cultural Resources (section included to satisfy Historic Preservation Act consultation requirements with the State Historic Preservation Office)**
- **Section 5.9: Public Health (includes Appendix 5.9A)**
- **Section 6.0: Alternatives Analysis**

AES Huntington Beach, LLC looks forward to working with the EPA during the review of the HBEP application materials and the issuance of the GHG PSD permit.

Sincerely,



**Stephen O'Kane
Manager
AES Huntington Beach, LLC**

Attachments: One (1) hard and two (2) electronic copies of the application materials

**cc: Felicia Miller/CEC (cover letter only)
Brian Yeh/SCAQMD (cover letter only)
Stephen O'Kane/AES (cover letter only)
Jerry Salamy/CH2M HILL (cover letter only)
Robert Mason/CH2M HILL (cover letter only)
John McKinsey/Stoel Rives (cover letter only)**



**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
HUNTINGTON BEACH ENERGY PROJECT**

**Docket No. 12-AFC-02
(Revised 9/17/12)**

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Jennifer Jennings
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*indicates change

DECLARATION OF SERVICE

I, Diane L. Scott, declare that on September 26, 2012, I served and filed a copy of the attached **AES RESPONSE TO SCAQMD AIR APPLICATION FOR HUNTINGTON BEACH ENERGY PROJECT (12-AFC-02)**, dated September 20, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: http://www.energy.ca.gov/sitingcases/huntington_beach_energy/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- Served electronically to all e-mail addresses on the Proof of Service list;
- Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses marked ***"hard copy required"** or where no e-mail address is provided.

AND

For filing with the Docket Unit at the Energy Commission:

- by sending one electronic copy to the e-mail address below (preferred method); **OR**
- by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT
Attn: Docket No. 12-AFC-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
michael.levy@energy.ca.gov

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.

Originally Signed By:

Diane L. Scott
Siting, Transmission and Environmental Protection Division