

KERN COUNTY AIR POLLUTION CONTROL DISTRICT
DAVID L. JONES, APCO



February 17, 2009

DOCKET

08-AFC-2

DATE FEB 17 2009

RECD. MAR 30 2009

Ms. Sara Head, QEP
Vice President Environmental Programs, West Region
AECOM Environment
1220 Avenida Acaso
Camarillo, California 93012

SUBJECT: Beacon Solar, Application No.: 0369001 – ‘007 - Project No.: 080414

Dear Ms. Head:

The Kern County Air Pollution Control District is in receipt of your comments regarding the Preliminary Documents of Compliance (PDOC) for the Beacon Solar Energy Project. In response to your comments the District offers the following statements:

Application 0369005-Vapor Control System

District Staff concurs with your assessment and will correct the typographical error to read:

“b. Carbon adsorption system shall have provisions for monitoring between carbon beds and exhaust of carbon adsorption system.”

Application 0369007-Bio-Remediation of Hydrocarbon Contaminated Soil

District Staff has reviewed your request to change conditions 5.c and 6. The proposed changes can be made without relaxing the requirements or increasing proposed emission; however, these changes will require change to condition 3 (as condition 3 makes no reference to soil moisture content, acidity, temperature, or nutrient ratio). Therefore, conditions 3, 5.c, and 6 shall read as follows:

3. Permittee shall maintain weekly VOC readings of bio-remediation area during any period it is operated. Permittee shall provide protocol for VOC readings, soil acidity (pH), soil moisture content (% weight), soil temperature (°F), and Nutrient Ratio (C:N:P) to be approved by District staff. (Rule 210.1)
- 5.c. The following parameters in treatment area shall be monitored according to approved protocol: VOC readings over treatment area in use, soil acidity (pH), soil moisture content (% weight), soil temperature (°F), and Nutrient Ratio (C:N:P);
6. Soil moisture content shall be maintained according to District approved protocol. (Rule 210.1)

Regarding District established emission limits, as stated previously, the District is required to establish daily annual emissions limits (by Rule – See District Rule 210.1). If it is determined calculated emissions are not representative of actual emissions, the District has procedures to re-calculate emissions to correct calculated emissions to actual emission levels. Please be aware, all calculated emissions are estimates based on established emission factors and other information obtained from this District, other Air Districts, the California Air Resources Board (ARB), and the United States Environmental Protection Agency (EPA) and other scientific sources.

PDOC Engineering Evaluation

Section V.A.

District Staff concurs with your assessment there is a typographical error and the correction will be made to read as follows: "...Boilers will be equipped with low NOx burners...."

Section VIII.C, Item 4 ATC No. 0369005 (Vapor Control System)

District Staff concurs with your assessment there is a calculation error in conversion of 36000-gallons to cubic feet. District staff agrees the correct number is 4812.5-ft³ and not 481.25-ft³. However, the corrected value of 6.26-lb/hr is calculated from the product of 4812.5-ft³/hr and vapor density of 0.26-lb/ft³, resulting in a difference by a factor of 10, not 100. Also, you are correct, District staff calculated tank volume is evacuated in one hour, instead of 2-hours as stated by WorleyParsons. However, methodology utilized to calculate emissions is sound; the resultant calculated emissions will be utilized. Additionally, WorleyParsons emission estimates only state assumptions and resultant emissions without calculations. This methodology is not sufficient for District calculations. Therefore, corrections will be made and emissions recalculated.

WorleyParsons assumptions stated a control efficiency of 99.5% for the dual carbon canisters. Therefore, the District's Engineering Analysis will be corrected to show and utilize 99.5% control efficiency for the carbon canister control efficiency. Overall, District staff will redo calculations for the Vapor Control System. The corrected volatile organic compound (VOC) emissions for the Vapor Control System are the following (and will be reflected in the Engineering Analysis and Document of Compliance (DOC) for the Vapor Control System):

lb/hr	lb/day	tons/year
3.13	6.26	1.14

Section VIII.C, Item 6 ATC No. 0369007 (Bio-Remediation Operation)

District Staff concurs with your assessment there is a typographical error and the correction will be made to read as follows: 1.069 lb/day x 365 days/yr x 0.0005 tons/lb = 0.195 tons/year

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Section VIII.C, Item 7 (Emissions Summary)

District Staff concurs with your assessment the firewater pump engine (an emergency unit) emissions were added to Beacon Energy New Source Review Emissions Balance (NSRB) and Stationary Source Potential to Emit (SSPE). Therefore, Emissions summary has been recalculated to reflect removal of emergency equipment. The new emissions summary is the following:

Emissions Summary

Totals:	PM-10	SOx	NOx	VOC	CO
lb/hr:	1.03	0.03	0.66	5.08	2.22
lb/day:	15.63	0.48	9.24	32.14	31.08
tons/yr:	1.96	0.02	0.33	5.22	1.11

The above changes shall be included in the Engineering Analysis and FDOC, a copy of which will be sent to you upon completion. Thank you, for your comments. Should you have any questions, please telephone Glen Stephens of our office at (661) 862-5250.

Sincerely,



Glen E. Stephens, P.E.
Air Quality Engineer III

GES:tf

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA**

**APPLICATION FOR CERTIFICATION FOR
THE BEACON SOLAR ENERGY PROJECT**

DOCKET NO. 08-AFC-2

PROOF OF SERVICE
(Revised 2/9/09)

<u>APPLICANT</u>	<u>COUNSEL FOR APPLICANT</u>	<u>ENERGY COMMISSION</u>
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Declaration of Service

I, Lois Navarrot, declare that on March 30, 2009, I served and filed copies of the attached **Letter dated February 17, 2009 from Kern County Air Pollution Control District to AECOM Environment regarding Beacon Solar**. 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/beacon. 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

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

by personal delivery or by depositing in the United States mail at Sacramento, California 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

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

OR

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

California Energy Commission
Attn: Docket No. 08-AFC-2
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

docket@energy.state.ca.us

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

/s/
Lois Navarrot