



# DOCKET

08-AFC-5

DATE OCT 20 2009

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October 20, 2009

Mr. Christopher Meyer  
Project Manager  
Attn: Docket No. 08-AFC-5  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Subject: SES Solar Two (08-AFC-5)  
Determination of Compliance  
URS Project No. 27657105.00100

Dear Mr. Meyer:

On behalf of SES Solar Two, LLC, URS Corporation Americas (URS) hereby submits the Imperial County Air Pollution Control District's Determination of Compliance for the SES Solar Two Project.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to submit this material on behalf of SES Solar Two, LLC.

Sincerely,

Angela Leiba  
Project Manager

AL:ml



October 14, 2009

Mr. Bob Linden  
Executive Vice President  
SES Solar Two LLC.  
4800 North Scottsdale Rd, Suite 5500  
Scottsdale, AZ 85251

Dear Mr. Linden:

Pursuant to Imperial County Air Pollution Control District (ICAPCD) Rules and Regulations, the Air Pollution Control Officer (APCO) has made a decision to grant SES Solar Two LLC a Determination of Compliance (DOC) to install and operate a 750 megawatts (MW) Solar Generating Power Plant. The facility will install solar panel dishes to generate solar electricity and will require approximately 6,500 acres of land located near Plaster City. The Determination of Compliance has gone through a public review period of 30 days, starting on August 25<sup>th</sup>, 2009 and a comment letter dated September 21<sup>st</sup>, 2009 was received from the California Energy Commission. Copies of the comment letter and the Determination of Compliance are enclosed for your records.

If you have any questions regarding this final action or require any further information, please contact Jaime Hernandez, APC Senior Engineer or Israel Hernandez, APC Engineer at (760) 482-4606.

Sincerely,

Israel Hernandez  
APC Engineer  
Imperial County, APCD

AIR POLLUTION CONTROL DISTRICT



10/14/09

Eric Knight, Manager  
Environmental Protection Office  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Dear Mr. Knight

The Imperial County Air Pollution Control District has received your letter dated September 21<sup>th</sup>, 2009 and addressing Preliminary Declaration of Compliance for the SES Solar Two Project.

Thank you for submitting comments and participating in this review. The ICAPCD has had an opportunity to analyze your comments and the following response has been prepared:

1. Fugitive Dust Mitigation Conditions

*Generally, the Energy Commission's license contains the detailed fugitive dust mitigation conditions. While we are not adverse to these conditions also being included in the District's DOC, we would like the District's conditions to reflect the project site specific conditions that staff will be developing to address the specific issue and applicant stipulations for this case. The conditions provided in the PDOC are somewhat dates Energy Commissions conditions that are not project site specific. Therefore, we suggest that the District work with Energy Commission and Bureau of Land Management (BLM) in the FDOC, or delete the specific Construction Phase fugitive dust conditions and Facility Roads conditions from the DOC in consideration of the fugitive dust mitigation conditions that will be included in the Energy Commission license/BLM approval .*

Response: Upon request of the Energy Commission and Bureau of Land Management (BLM) conditions pertaining to construction fugitive dust mitigation will be removed from the Imperial County Air Pollution Control District's Declaration of Compliance. The removal of construction phase fugitive dust mitigation conditions is done in anticipation of CEC's own construction phase fugitive conditions and to avoid any duplication or redundancy.

2. Emergency Generator

*The emergency generator is subject to New Source Performance Standards (NSPS) Subpart IIII. Staff's interpretation of that federal rule is that after 2007 emergency engines the size of that proposed for SES Solar Two Project will need to meet Tier # emission standards (40 CFR 60.4205 (b)). So, Staff has two general concerns; first that it be clear in the conditions that the engine will need to meet Tier 3 emission standards,*

and second if the District has been delegated authority of NSPS Subpart III that there is a condition requiring compliance with the requirements of that regulation (including operating hour meter). Staff can provide examples of similar emergency engine conditions approved for other recent cases.

Response: Condition D.6 and D.7 have been added and contain hour meter and Tier requirements.

3. Gasoline Tank

Staff is concerned that the gasoline tank should have at least two District permit conditions. The first condition would require that the tank be equipped with and use Phase I vapor balance controls. The Second condition would limit monthly gasoline transfer to vehicles to less than 10,000 gallons per month, as required that for Phase II vapor balance exemption requirements, and require that records of gasoline throughput be kept and maintained as required by District Rule 415 Section D.

Response: After confirming with applicant that tank was going to be equipped with Phase I and Phase II vapor recovery systems, Phase I and Phase II conditions have been added.

4. Emergency Engine Emissions

As noted above the emergency engine emissions should conform to Tier 3 emission standard requirements. Additionally, considering that the annual testing operation is limited to 50 hours by the permit conditions, we would suggest using one hour per day and 50 hours per year to calculate maximum daily and annual emissions rather than the 15 minute per day and 13 hours per year basis that is used in the PDOC.

Response: Comment noted.

5. Gasoline Tank Emissions

The Column headings in the emissions calculation table are reversed in terms of the lb/gallon and lbs/1000 gallon emission factors.

Response: Comment noted.

6. Road Dust Emission Calculations

Staff has no specific comments on the PDOC calculations, but we may want to confer with District staff regarding the assumptions used in these PDOC calculations as we complete on-site and off-site air basin-wide emission calculations that will be used to determine General Conformity applicability.

Response: Comment noted.

If you have further inquiries about this Project, please contact the undersigned at (760) 482 4606.

Sincerely,

A handwritten signature in black ink, appearing to read 'IH 76', written in a cursive style.

Israel Hernandez

APC Engineer

Imperial County, APCD

10/14/09

**Imperial County Air Pollution Control District  
Determination of Compliance and Conditions**

Permit Number	3838
Source Name	SES Solar Two LLC
Application For	Power Generator
Location	6,500 acres near Plaster City
Mailing Address	2920 E. Camelback Road, Suite 150, Phoenix, AZ 85016
Responsible Agent	Richard Knox (602) 957 1818
Permit Reviewers	Jaime Hernandez and Israel Hernandez

**I. Engineering Review**

**A. Introduction**

An application has been received on behalf of SES Solar Two LLC for the installation and operation of 30,000 Stirling Systems solar dishes. The nominal design electrical generating capacity of the Project is approximately 750 megawatts (MW). The only stationary source of emission associated with the Project is an emergency standby generator and an above ground fuel storage tank. In addition fugitive service road emissions will also be assessed for this Project.

**B. Source Description**

SES Solar Two LLC proposes to install and operate a power generating facility near Plaster City. This facility will be made up of about 30,000 solar panel systems and its associated equipment. The solar panel systems are manufactured by Stirling Energy Systems Inc. The Project will require 6,500 acres of land.

Operational stationary sources of emissions for the Project will be limited to an emergency standby electric generator driven by a diesel fueled compression ignition (CI) engine. The backup generator engine will be rated at approximately 335 horsepower and will be tested 15 minutes per week (13 hours per year) to ensure their operability in the event of an emergency. Emissions are also expected from an above ground 5,000 gallon gasoline storage tank.

The projected construction schedule has a total duration of 40 months for full build-out of 750 megawatts. Different areas within the Project Site and the construction lay-down areas would be disturbed at different times over this period. Estimated construction area is 6,500 acres for the Project Site and 25 acres for the staging area within the 100-acre lay-down area located east of Dunaway Road.

Fugitive dust emissions from the construction of the Solar Two Project will result from:

- site grading/excavation activities at the construction site,
- installation of new transmission lines and waterlines,
- installation of SunCatcher foundations,
- construction of power plant facilities, roads, and substation,
- on-site travel on unpaved surfaces, and
- off-site travel of worker vehicles and trucks on paved roads.

Fuel combustion emissions during construction will result from:

- exhaust from the off-road construction equipments, including diesel construction equipment used for site grading, excavation, and construction of on-site structures, and water trucks used to control construction dust emissions,
- exhaust from on-road construction vehicles, including pickup trucks and diesel trucks used to transport workers and materials around the construction site, and from diesel trucks used to deliver concrete, equipment, and construction supplies to the construction site, and
- exhaust from vehicles used by workers to commute to the construction site.

Construction equipment and vehicle exhaust emissions were estimated using equipment lists and construction scheduling information provided by the Project design-engineering firm.

### **C. Emissions**

Emissions are expected from SES daily operations. These are produced by a standby emergency generator, an above gasoline storage tank, and vehicular traffic. Emissions are calculated using operational information provided by the applicant.

#### *Combustion Emissions*

SES will be operating an emergency stand by generator, driven by a Cummins model QSL9-G3NR3 and 335 bhp. This unit shall conform to EPA Tier 3 emission standard requirements. This unit will be providing back up energy to the facility control room, substation control and protection equipment. It is scheduled to operate for testing 1 hour per week and a total of 50 hours per year.

<b>Emergency Standby Generator</b>		
Rated Horsepower	335	BHP

Testing Duration	1	hr/week		
Yearly Testing	52	weeks		
Expected non-emergency usage	50	hr/yr		
				Yearly Emissions (ton/year) (50 hr Potential)
Pollutant	Emission Factor (g/hp-hr)	Emission Rate (lb/hr)	1 hr Testing (lbs/day)	
NO <sub>x</sub>	2.80	2.07	2.07	0.05
CO	2.60	1.92	1.92	0.05
ROC	0.20	0.15	0.15	0.00
SO <sub>x</sub>	0.12	0.09	0.09	0.00
PM <sub>10</sub>	0.15	0.11	0.11	0.00

*Above Ground Fuel Storage*

Emissions are expected from an above ground storage tank. SES will be dispensing gasoline from this 5,000 gal tank. Yearly throughput is expected to be 85,000.

Emissions On Above Ground Storage Tank

Above Ground Storage Tank Capacity 5000 gal  
 Fuel Type Gasoline  
 Throughput (gal/year) 85,000  
 Days of Operation 365

	E.F./ 1000	E.F. / (lb/gal)	Throughput (gallons)	Emissions (lbs/year)
Filling Underground tank (Phase 1)	0.3	0.0003	85000	25.5
Underground Tank Breathing and Emptying	1.0	0.001	85000	85
Displacement Losses (Uncontrolled)	11.0	0.011	85000	935
Spillage	0.7	0.0007	85000	59.5
				1105

*Fugitive Dust Emissions*

Fugitive dust emissions are expected from vehicular traffic. The Project will take place in approximately 6,500 acres of land. Maintenance and washing traffic will result in most of these emissions. Operational parameters have been provided by applicant.



## Sealed Roads

SES Solar One is proposing to utilize a chemical sealant for soil stabilization and fugitive emissions control. US EPA AP 42 EPA AP-42 Section 13.2.2 Unpaved Roads Equations 1a and 2 emission factor formulas are used to calculate fugitive emissions. A 90% control emission factor will be applied to the total fugitive emissions from the sealed roads. Traffic variables have been provided by applicant.

### Solar Two

#### Fugitive Dust Emissions (On-Site)

$$E = k * (s/12)^{0.9} * (W/3)^{0.45} * (365-P/365)$$

$$k(10) = 1.5$$

$$s = 8.5 \text{ silt content}$$

$$W = \text{See Table Below}$$

$$k(2.5) = 0.15$$

$$P = 12$$

Vehicle Type	No. Of Units	Max Daily Distance per Vehicle (Mile/day)	Assumed Distance percentage to drive on sealed roads	Max. Daily Distance per Vehicle to drive on sealed roads	Max. Daily VMT (all units) Sealed Road	Mean Vehicle Weight (tons)	Max Operating Days / Month
Washing Vehicle	35	7	100%	7	245	12	30
LRU Maintenance Truck with Boom	20	7	100%	7	140	10	30
Staff & Security Truck	5	33	100%	33	165	2.25	30
Rubber-Wheel forklift with telescoping boom	2	10	100%	10	20	4	30
Forklift	2	10	100%	10	20	3	30
Telescoping Man Lift	7	10	100%	10	70	3	30
Staff Cars	100	3	0%	0	0	2	30
Van Pooling	4	3	0%	0	0	4	30
Visitor Cars	8	3	0%	0	0	2	22
Operations and Management Supplies truck	1	3	0%	0	0	5	5
Waste Management truck	1	3	0%	0	0	20	5
Hazardous Water truck	1	3	0%	0	0	20	5
Transport Tractor Trailers truck	1	10	70%	7	7	20	5

PM <sub>10</sub> EF (lbs/VMT) Sealed Road	PM <sub>2.5</sub> EF (lbs/VMT) Sealed Road	Sealed Road PM <sub>10</sub> Fugitive Emissions (lb/day)	Sealed Road PM <sub>2.5</sub> Fugitive Emissions (lb/day)	Sealed Road PM <sub>10</sub> Fugitive Emissions (ton/yr)	Sealed Road PM <sub>2.5</sub> Fugitive Emissions (ton/yr)
1.985	0.198	486.27	48.63	87.53	8.75
1.828	0.183	255.98	25.60	46.08	4.61
0.934	0.093	154.19	15.42	27.75	2.78
1.211	0.121	24.21	2.42	4.36	0.44
1.064	0.106	21.27	2.13	3.83	0.38
1.064	0.106	74.45	7.45	13.40	1.34
0.886	0.089	0.00	0.00	0.00	0.00
1.211	0.121	0.00	0.00	0.00	0.00
0.886	0.089	0.00	0.00	0.00	0.00
1.339	0.134	0.00	0.00	0.00	0.00
2.498	0.250	0.00	0.00	0.00	0.00
2.498	0.250	0.00	0.00	0.00	0.00
2.498	0.250	17.48	1.75	0.52	0.05
<b>TOTAL</b>		<b>1033.87</b>	<b>103.39</b>	<b>183.47</b>	<b>18.35</b>
	90% Control	103.39	10.34	18.35	1.83

*Paved Roads Fugitives*

Fugitive emissions are also expected from paved roads traffic. EPA AP-42 Section 13.2.1 Paved Roads Equation 1 Paved Roads emission factor formulas and silt loading values for paved roads are used to calculate fugitive emissions. Traffic variables have been provided by applicant. Silt loading will be controlled on these roads by street sweeping as necessary.

**Fugitive Dust Emissions (On-Site)**

$$E = k * (sL/2)^{0.65} * (W/3)^{1.5}$$

k(10) = 0.016

sL = 1.6

W = See Table Below

k(2.5)= 0.0024

0.00047

0.00036

Vehicle Type	No. Of Units	Max Daily Distance per Vehicle (Mile/day)	Assumed Distance percentage to drive on Paved roads	Max. Daily Distance per Vehicle to drive on Paved roads	Max. Daily VMT (all units) Paved Road	Mean Vehicle Weight (tons)	Max Operating Days / Month
Washing Vehicle	35	7	0%	0	0	12	30
LRU Maintenance Truck with Boom	20	7	0%	0	0	10	30
Staff & Security Truck	5	33	0%	0	0	2.25	30
Rubber-Wheel forklift with telescoping boom	2	10	0%	0	0	4	30
Forklift	2	10	0%	0	0	3	30
Telescoping Man Lift	7	10	0%	0	0	3	30
Staff Cars	100	3	100%	3	300	2	30
Van Pooling	4	3	100%	3	12	4	30
Visitor Cars	8	3	100%	3	24	2	22
Operations and Management Supplies truck	1	3	100%	3	3	5	5
Waste Management truck	1	3	100%	3	3	20	5
Hazardous Water truck	1	3	100%	3	3	20	5
Transport Tractor Trailers truck	1	10	30%	3	3	20	5

PM <sub>10</sub> EF (lbs/VMT) Paved Road	PM <sub>2.5</sub> EF (lbs/VMT) Paved Road	Paved Road PM <sub>10</sub> Fugitive Emissions (lb/day)	Paved Road PM <sub>2.5</sub> Fugitive Emissions (lb/day)	Paved Road PM <sub>10</sub> Fugitive Emissions (ton/yr)	Paved Road PM <sub>2.5</sub> Fugitive Emissions (ton/yr)
0.109	0.016	0.00	0.00	0	0
0.083	0.012	0.00	0.00	0	0
0.008	0.001	0.00	0.00	0	0
0.021	0.003	0.00	0.00	0	0
0.013	0.002	0.00	0.00	0	0
0.013	0.002	0.00	0.00	0	0
0.007	0.001	2.10	0.23	0.38	0.04
0.021	0.003	0.25	0.03	0.04	0.01
0.007	0.001	0.17	0.02	0.02	0.00
0.029	0.004	0.09	0.01	0.00	0.00
0.236	0.035	0.71	0.11	0.02	0.00
0.236	0.035	0.71	0.11	0.02	0.00
0.236	0.035	0.71	0.11	0.02	0.00
<b>TOTAL</b>		<b>4.73</b>	<b>0.61</b>	<b>0.51</b>	<b>0.06</b>

## Facility Wide Emissions

Daily and yearly facility wide emissions are presented below.

Facility-wide Emissions (lb/day)							
		PM10	PM2.5	Nox	CO	Sox	ROC
Sealed Roads		103.39	10.34				
Paved Roads		4.73	0.61				
Emergency Standby		0.11		2.07	1.92	0.14	0.15
Gasoline Storage							3.03
		108.22	10.95	2.07	1.92	0.14	3.18

Facility-wide Emissions (tons/yr)							
		PM10	PM2.5	Nox	CO	Sox	ROC
Sealed Roads		18.35	1.83				
Paved Roads		0.51	0.06				
Emergency Standby		0.00		0.05	0.05	0.00	0.00
Gasoline Storage							0.55
		18.86	1.89	0.05	0.05	0.00	0.55

### D. Applicable Rules

### Compliance Status

201a Authority to Construct In Process

201b Permit to Operate In Process

207 New & Modified Stationary Source Review  
 The Imperial County is in non-attainment for ozone and PM10. The New Source Review Rule has the intention of reducing ozone precursors and anthropogenic PM10 in order to bring the County back into attainment status. The offsetting threshold for these pollutants is 137lbs per day, where exceeding PTE will have to offset the difference. Current Project does not exceed offsetting thresholds.

**BACT:** The diesel engine stand-by equipment is required to meet ATCM standards, which correspond to US EPA Tier 3 emission standards and 0.15 g/bhp-hr for PM10. The emergency stand by generator driven by the diesel engine meets these requirements. The ICAPCD has determined that complying with the diesel ATCM

the equipment meets BACT requirements.

Best Available Control Technology is also achieved through operational practices. Water and Soil sealants will be sprayed on unpaved roads to prevent excess emissions.

302	Fee Schedule	
	More than one fee schedules are applicable to this permit. Based on this Rule, fees will be assessed considering Schedule 9 – Miscellaneous Equipment, which is the standard fee for emergency stand by equipment.	
401	Opacity of Emissions	In Compliance
407	Nuisance Rule	In Compliance
Reg VIII	General Requirements for Control of Fine Particulate Matter Regulation VIII intends to reduce the amount of PM10 entrained in the ambient air as a result of emissions generated from anthropogenic activities. PM 10 sources from within Imperial County by requiring actions to prevent, reduce, or mitigate PM10 emissions. The Permittee will fulfill this regulation's general requirements and will keep records as stated in Regulation VIII.	
H&SC Section 42301.6		In Compliance

## **II. Permit to Operate Conditions**

### **A. Authority to Construct and Permit to Operate Conditions**

1. Operation of this equipment shall be in compliance with all data and specifications submitted with the application on August 11<sup>th</sup>, 2008 (FR#574708) under which this permit is issued unless otherwise noted.
2. Operation of the described equipment shall be in compliance with all applicable Imperial County Air Pollution Control District Rules and Regulations.
3. This Permit does not authorize the emissions of air contaminants in excess of those allowed by U.S. EPA (Title 40 of the Code of Federal Regulations), the State of California Division 26, Part 24, Chapter 3 of the Health and Safety Code, or the APCD (Rules and Regulations).
4. This permit cannot be considered permission to violate applicable existing laws, regulations, rules, or statutes of other governmental agencies.

5. No air contaminant shall be released into the atmosphere which causes a public nuisance, caused by permitted operation.

#### **B. Facility Roads**

1. Materials used for Chemical Stabilization of soils, including petroleum resins, asphaltic emulsions, acrylics, and adhesives shall not violate State Water Quality Control Board standards for use as a soil stabilizer. Materials accepted by the California Air Resources Board (ARB) and the United States Environmental Protection Agency (EPA), and which meet State water quality standards, shall be considered acceptable to the ICAPCD.
2. Any use of dust suppressants or gravel pads, and paving materials such as asphalt or concrete for paving, shall comply with other applicable District rules.
3. The Permittee shall apply Soiltac soil conditioner or a similar product on all unpaved roads once per year or as necessary to comply with application information.
4. The owner/operator of the site must clean up any bulk material tracked out or carried out onto a paved road at the end of the work day.
5. All paved and unpaved roads shall limit Visible Dust Emissions (VDE) to 20% opacity, as determined by the test methods for "visual Determination of Opacity" in Rule 800 Appendix A. .
6. The Permittee shall compile and retain records that provide evidence of control measure application. The Permittee shall describe, in the records, the type of treatment or control measure, extent of coverage, and date applied. For control measures which require multiple daily applications, recordings the frequency of application will fulfill the recordkeeping requirements of this rule. (i.e., water being applied three times a day and the date). Records shall be provided to the ICAPCD upon request.

#### **C. Emergency Generator Engine**

1. A log shall be maintained on the premises showing hours of operation and routine repairs of emergency generator engine. This log shall be made available for inspection by the ICAPCD.
2. The emergency generator engine shall be restricted to operate a total of 50 hours per year for non-emergency testing and maintenance purposes.

3. Permittee shall submit to the ICAPCD an annual report by the end of February of each operating year containing the monthly fuel consumption and hours operated per month for the unit.
4. The emergency generator shall not be used to provide power to sources other than the SES Solar Two Power Plant.
1. The diesel engine shall not discharge into the atmosphere any visible air contaminant other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour, which is 20% opacity or greater.
2. Hour Meter, with a minimum display capability of 9,999 hours, shall be installed and maintained to proper working condition for the unit.
3. Emergency generator set's diesel is subject to New Source Performance Standards (NSPS) Subpart IIII and shall meet Tier 3 emissions standards (40 CFR 60.4205 (b)).

**D. Above Ground Storage Tank**

1. The Phase I Vapor Recovery System shall be installed and operated in accordance with the requirements of the California Air Resources Board (CARB) Executive Order G-70-102-A – Certification of a Phase I Vapor Recovery System for Aboveground Storage Tanks with less than 40,000 Gallons Capacity for Gasoline or Gasoline/Methanol Blended Fuels.  
**CARB E.O. G-70-102-A**
2. The Phase II Vapor Recovery System, including all associated underground and aboveground plumbing, shall be installed, operated, and maintained in accordance with CARB's Executive Orders G-70-52-AM – Certification of Components for Red Jacket, Hirt, and Balance Phase II Vapor Recovery System and Executive Order G-70-162-A – Steel Tank Institute Fireguard Aboveground Tank Vapor Recovery System. Section 41954(f) of the California Health and Safety Code prohibits the sale, offering for sale, or installation of any vapor control system unless the system has been certified by CARB.  
**CARB E.O. G-70-52-AM; CARB E.O. G-70-162-A**
3. All applicable components shall be maintained to a state that is leak free and vapor tight.  
**ICAPCD Rule 415**
4. The District shall be notified when installation of all piping and control fittings required by aforementioned Rules has been completed. Vapor

control piping and fittings shall remain exposed until the District has inspected the installation or given approval to complete back fill.

**ICAPCD Rule 415 & 108**

5. Each vent pipe shall be equipped with a CARB certified pressure/vacuum relief valve. Plumbing may be manifolded to reduce the number of relief valves needed. The settings of the pressure/vacuum relief valve(s) shall be as follows:
  - a) Positive Pressure Setting: 2.5 to 6.0 inches H<sub>2</sub>O
  - b) Negative Pressure Setting: 6.0 to 10.0 inches H<sub>2</sub>O

**CARB E.O. G-70-102-A**

6. The permittee shall successfully conduct the following performance tests of the Phase I Vapor Recovery System within thirty (30) days of start-up:
  - a) CARB TP-201.3B – Determination of Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities with Aboveground Storage Tanks.

**CARB E.O. G-70-102-A; ICAPCD Rule 415**

7. For the purpose of compliance determination, all tests shall be conducted after all back-filling, paving, and installation of all Phase I and Phase II components, including P/V valves, have been completed.

**ICAPCD Rule 415**
8. The permittee shall submit all test results for the initial performance tests required pursuant to condition No. 6 within twenty (20) days of start-up.

**ICAPCD Rule 415**
9. The performance tests required pursuant to condition No. 6 shall be successfully conducted at least once in each twelve (12) month period after the date of successful completion of the startup performance testing. Test results shall be submitted to the Air District within twenty (20) days of conducting these annual tests.

**ICAPCD Rule 415**
10. Permittee shall annually submit to the Air District a report containing the gasoline throughput from the preceding calendar year. This annual report shall be submitted to this office no later than February 28<sup>th</sup>.
11. Permittee shall maintain an operational and maintenance manual for the Phase I and Phase II vapor recovery system of the facility. The manual



must be kept at the facility and made available to the APCD upon request.  
**ICAPCD Rule 415**

12. Permittee shall perform monthly liquid and vapor leak inspections during product transfer operations. Information record shall include date of inspection, findings, leak determination method, corrective action, and name and signature of person performing the inspection.

**ICAPCD Rule 415**

13. Uncertified, missing, or improperly installed equipment and emission related defects shall be tagged out of service immediately. Such defects include, but are not limited to, suffered damage or wear which prevents proper operation of equipment.

**ICAPCD Rule 415**

#### **E. Equipment List**

1. Emergency Generator Engine, driven by a Cummins, QSL9-GNR3, 335hp, T2 diesel Engine.

2. 5000 gallon above ground fuel storage tank.



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 SES SOLAR TWO PROJECT**

**Docket No. 08-AFC-5**

**PROOF OF SERVICE**

(Revised 8/17/09)

**APPLICANT**

Richard Knox  
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**INTERESTED AGENCIES**

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Jim Stobaugh,  
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\*indicates change

**DECLARATION OF SERVICE**

I, Angela Leiba, declare that on October 20, 2009, I served and filed copies of the attached, Imperial County APCD Determination of Compliance. 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: [\[http://www.energy.ca.gov/sitingcases/solartwo/index.html\]](http://www.energy.ca.gov/sitingcases/solartwo/index.html).

The documents have 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:**

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

  X   by personal delivery or by depositing in the United States mail at \_\_\_\_\_ 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:**

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

**OR**

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

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 08-AFC-5  
1516 Ninth Street, MS-4  
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[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

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

Original Signed By

\_\_\_\_\_  
Angela Leiba