

## Stora, Christine@Energy

**From:** Stephen O'Kane [stephen.okane@AES.com]  
**Sent:** Thursday, October 11, 2012 12:25 PM  
**To:** Dyas, Mary@Energy; Weikko Wirta  
**Cc:** Stora, Christine@Energy; Jerry.Salamy@CH2M.com; Jenifer Lee  
**Subject:** RE: Huntington Beach Amendment  
**Attachments:** AES Huntington Beach\_CO\_TV Revision.pdf

California Energy Commission

**DOCKETED**  
**00-AFC-13C**

TN # 68072  
OCT. 18 2012

Mary,

In response to the request below I have prepared the following response. Please let me know if further information is required.

The solvents, cleaners, paints and other VOC containing compounds proposed for use in the installation of the synchronous condenser project will be used in compliance with SCAQMD Rules 1113 – Architectural Coatings and 1171 – Solvent Cleaning Operations. All solvents, cleaners, paints or other VOC containing compounds will be procured within the SCAQMD to ensure product compliance with Rules 1113 and 1171 VOC limitations. Solvents and cleaners will be used to clean equipment prior to maintenance activities and the expected method of use will be wipe cleaning where the solvent is applied to a rag or other material for cleaning of parts. Architectural coatings will be used as needed to provide a protective finish on equipment. Coatings will be applied using approved methods (hand or airless spray systems) consistent with Rule 1113. The Applicant will track compliance of the use of VOC-containment materials through recordkeeping measures specified within Rules 1113 and 1171.

VOC containing compounds associated with the operation of the synchronous condenser will continue to be regulated under the existing Title V operating permit for the AES Huntington Beach Generating Station, Facility ID 115389. AES Huntington Beach will be the operator of the proposed synchronous condenser project under a lease agreement from Edison Mission Huntington Beach. Maintenance personnel and shops, lube oil cooling systems, portable equipment and other site services currently under the ownership and control of AES Huntington Beach will continue to support the Edison Mission Huntington Beach Units 3 & 4 synchronous condenser project. The VOC containing compounds required for the operation of the synchronous condenser project will continue to be regulated as Rule 219 Exempt Equipment and the requirements under Rule 1113 and Rule 1171. The Title V operating permit for the AES Huntington Beach Generating Station is attached for your reference.

It should be noted that the Huntington Beach Generating Station site is currently operated under two separate Title V operating permits. Facility 167432, the Edison Mission Huntington Beach Units 3 and 4 include the boilers, selective catalytic reduction systems, CO oxidation catalysts, stacks and urea storage tanks for the operation of the steam generating units. This permit will be surrendered prior to the operation of the synchronous condensers. Shared systems with the AES Huntington Beach facility 115389 will remain in place and operating under their existing Title V permit.

Stephen O'Kane

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**From:** Dyas, Mary@Energy [mailto:Mary.Dyas@energy.ca.gov]  
**Sent:** Thursday, October 11, 2012 8:04 AM  
**To:** Stephen O'Kane; Weikko Wirta  
**Cc:** Stora, Christine@Energy  
**Subject:** RE: Huntington Beach Amendment

Steve and Weikko:

Air Quality staff has a question pertaining to the amendment that they need answered for their analysis of the amendment. The question is as follows:

Page 2 of Appendix A, mentions several solvents, cleaners, paints and other VOC-containing compounds that will continue to be used after converting the Huntington Beach Units 3 and 4 to synchronous condensers. Can you please provide additional information on the use of VOC-containing compounds as discussed in the amendment. Specifically, please include a brief description of the usage of these compounds with respect to any applicable SCAQMD rule or regulation such as Rule 1171. In the description, please identify each applicable SCAQMD rule or regulation, the basis of the applicability and how you will comply with the rule or regulation.

Thank you for your help with this.

Mary



**MARY DYAS | Compliance Project Manager**

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**CALIFORNIA ENERGY COMMISSION**

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**From:** Stora, Christine@Energy

**Sent:** Tuesday, September 11, 2012 11:48 AM

**To:** Stephen O'Kane; Weikko Wirta ([weikko.wirta@aes.com](mailto:weikko.wirta@aes.com))

**Cc:** Marxen, Chris@Energy; Dyas, Mary@Energy

**Subject:** Huntington Beach Amendment

Steve and Weikko.

While I'm out of the office between September 24 and October 24, please coordinate with Mary Dyas. She will handle the petition submittal for you and I will work with staff on the other items when I return to the office.

Mary can be contacted at 916-651-8891 and she is copied on this e-mail.

Thanks,

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