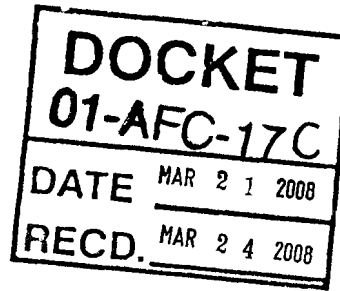


March 21, 2008



**sierra  
research**

1801 J Street  
Sacramento, CA 95814  
Tel: (916) 444-6666  
Fax: (916) 444-8373

Ann Arbor, MI  
Tel: (734) 761-6666  
Fax: (734) 761-6755

Mr. John Yee  
Supervisor  
South Coast AQMD  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182

Subject: RECLAIM/Title V Facility Permit for the Inland Empire Energy Center  
(Facility ID 129816)

Dear Mr. Yee:

On behalf of Inland Empire Energy Center LLC, we are pleased to submit the enclosed District application forms requesting a minor RECLAIM/Title V permit change for the Inland Empire Energy Center (IEEC). We are requesting a change to the permit to allow a total of up to 200 hours of auxiliary boiler (Device D3) operation prior to SCR catalyst installation and operation. Boiler operation without the SCR catalyst is necessary to avoid contamination and poisoning of the catalyst during the initial hours of boiler operation. The expected NO<sub>x</sub> emission level during this 200 hour period is 83 ppmv @ 3% O<sub>2</sub> which is equivalent to approximately 100.67 lbs/MMSCF. Other than an exemption from the 1-hr average NO<sub>x</sub> permit limit of 7 ppmv @ 3% O<sub>2</sub> (Condition A195.4) and a change to the interim reporting NO<sub>x</sub> emission factor, there is no need to change any other permit limit for the boiler including the annual NO<sub>x</sub> RECLAIM RTC limit (Condition I296.3). We request the following changes to the permit conditions for this unit:

- Condition A99.2: The 100.67 lbs/MMSCF NO<sub>x</sub> emission factor shall apply prior to installation and operation of the SCR catalyst during the interim reporting period to report RECLAIM emissions. The 8.49 lbs/MMSCF NO<sub>x</sub> emissions factor shall apply after the installation and operation of the SCR catalyst during the interim reporting period to report RECLAIM emissions.
- Condition A195.4: The 7.0 PPMV NO<sub>x</sub> emission limit(s) is averaged over 1 hour at 3 percent oxygen, dry basis. This limit shall not apply during the first 200 hours of auxiliary boiler operation.

Since no change is proposed to annual emissions limits, or to emission levels for any pollutant other than NO<sub>x</sub>, the only impact to the project's modeling analysis relates to


1-hour average NO<sub>2</sub> impacts. To address this issue, we have scaled the modeling results shown in the February 2, 2005 permit application. In that application, NO<sub>x</sub> emissions from the auxiliary boiler were modeled based on an emission rate of 0.166 grams per second (Table D-4, p. 78 of the draft revised engineering analysis). During commissioning of the auxiliary boiler without the SCR system, NO<sub>x</sub> emissions are expected to be  $(83 / 7) * 0.166 = 1.968$  grams per second. One-hour average NO<sub>2</sub> impacts from the auxiliary boiler alone were not required to be evaluated in the prior application; however, these impacts can be calculated from the acute health risk impacts for the auxiliary boiler shown in Table K-9-A7 of the application document. As shown in that table, the acute HHI for the auxiliary boiler was calculated to be 0.0088 based on a model input of 1.41E-4. Thus, the chi/Q value for 1-hour impacts can be calculated as  $(0.0088 / 1.41E-4) = 62.41$  µg/m<sup>3</sup> per gm/sec. Based on the elevated NO<sub>x</sub> emission rate prior to operation of the SCR system of 1.968 gm/sec, the worst case 1-hour average NO<sub>2</sub> impacts during this period would be  $(1.968 \times 62.41) = 122.8$  µg/m<sup>3</sup>. Since the auxiliary boiler will be the only device in operation during this period, this also represents the worst-case facility total impacts. By comparison, the facility total impacts previously evaluated were 293.4 µg/m<sup>3</sup>. (See 5/13/05 SCAQMD engineering analysis, Table 34, p. 42.) Consequently, the impacts are no greater than those previously evaluated.

Enclosed is a check in the amount of \$7,557.04 payable to the District to cover the filing fee for the requested permit change, including the 50% additional fee for an expedited review by the District. The amount of this filing fee was determined based on the SCAQMD's online permit application filing fee calculator and is summarized below:

- Change of condition for auxiliary boiler: \$4,015.22
- Expedited permit fee (50% of above amounts): \$2,007.61
- Title V/RECLAIM permit minor modification fee: \$1,534.21
- Total fee required: \$7,557.04

If you have any questions or need further information, please don't hesitate to contact me.

Sincerely,

  
Gary Rubenstein  
Senior Partner

Enclosure

cc: Dale Runquist, CEC  
CEC Dockets Office, Docket #01-AFC-17C  
Craig Matis, GE  
John Gates, GE  
Ken Kohl, GE  
Barry Bedaw, GE



**SIERRA RESEARCH**  
 916-444-6666  
 1801 J Street  
 Sacramento, CA 95811

UNION BANK OF CALIFORNIA, N.A.  
 SACRAMENTO, CA 95814  
 11-49/1210

20144

3/21/2008

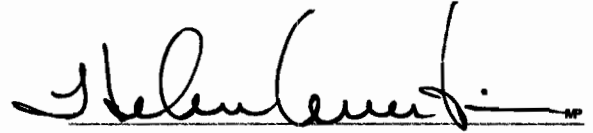
PAY TO THE ORDER OF South Coast AQMD

\$ \*\*7,557.04

Seven Thousand Five Hundred Fifty-Seven and 04/100\*\*\*\*\*

DOLLARS  

South Coast AQMD



MEMO

⑈020144⑈ ⑆121000497⑆ 21911290⑈

South Coast AQMD  
 Date 3/21/2008 Type Bill Reference ID 129816

Original Amt.	Balance Due	3/21/2008 Discount
7,557.04	7,557.04	
	Check Amount	

20144  
 Payment 7,557.04  
 7,557.04

Union Bank of Californ

7,557.04



Section A: Operator Information

1. Business Name of Operator To Appear On The Permit: Inland Empire Energy Center, LLC
2. Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD): 129816
3. Owner's Business Name (only if different from Business Name of Operator): N/A

Section B: Equipment Location

4. Equipment Location Address: For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site
26226 Antelope Road
Street Address
Romoland CA 92585
City State Zip Code
County: [ ] Los Angeles [ ] Orange [ ] San Bernardino [X] Riverside
Contact Name: John Gates
Contact Title: H Systems Asset Mang. Phone: (951) 928-6905
Fax: (866) 210-6953 E-Mail: John.Gates@ge.com

Section C: Permit Mailing Address

5. Permit and Correspondence Information:
[ ] Check here if same as equipment location address
PO Box 1240, 26226 Antelope Road
Street Address
Romoland CA 92585
City State Zip Code
Contact Name: John Gates
Contact Title: H Systems Asset Mang. Phone: (951) 928-6905
Fax: (866) 210-6953 E-Mail: John.Gates@ge.com

Section D: Application Type The facility is in [ ] RECLAIM [ ] Title V [X] RECLAIM & Title V Program (please check if applicable)

6. Reason for Submitting Application (Select only ONE):
[ ] New Construction (Permit to Construct)
[ ] Equipment Operating Without A Permit or Expired Permit\*
[ ] Administrative Change
[ ] Equipment On-Site But Not Constructed or Operational
[ ] Title V Application (Initial, Revisions, Modifications, etc.)
[ ] Compliance Plan
[ ] Facility Permit Amendment
[ ] Registration/Certification
[ ] Streamlined Standard Permit
[ ] Permitted Equipment Altered/ Modified Without Permit Approval\*
[ ] Proposed Alteration/Modification to Permitted Equipment
[ ] Change of Condition For Permit To Operate
[X] Change of Condition For Permit To Construct
[ ] Change of Location—Moving to New Site
Existing Or Previous Permit/Application Number: A/N 439492
(If you checked any of the items in this column, you MUST provide a existing Permit/ Application Number)

7. Estimated Start Date of Operation/Construction (MM/DD/YYYY):
8. Description of Equipment: Allow 200 hrs of auxiliary boiler operation without SCR cat. installed (Device D3)
9. Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction? [X] No [ ] Yes
10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each)
11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are \$500,000 or less, or a not-for-profit training center?) [X] No [ ] Yes
12. Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment? [X] No [ ] Yes If yes, provide NOV/NC #

Section E: Facility Business Information

13. What type of business is being conducted at this equipment location? Power Plant
14. What is your business primary NAICS Code (North American Industrial Classification System)? 4911
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? [X] No [ ] Yes
16. Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location? [X] No [ ] Yes

Section F: Authorization/Signature I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official: [Signature]
18. Title: H Systems Asset Mang.
19. Print Name: John Gates
20. Date: 2/18 March 08
Check List:
[X] Form(s) signed and dated by authorized official
[ ] Supplemental Equipment Form (400-E-XX or 400-E-GEN)
[X] CEQA Form (400-CEQA) attached
[X] Payment for permit processing fee attached
Your application will be rejected if any of the above items are missing.

Table with columns: AQMD USE ONLY, APPLICATION/TRACKING #, TYPE B C D, EQUIPMENT CATEGORY CODE: CLASS I III IV, ASSIGNMENT Unit Engineer, CHECK/MONEY ORDER #, FEE SCHEDULE: \$, AMOUNT \$, VALIDATION Tracking #



Form 400-A

Application For Permit To Construct and Permit To Operate

Mail Application To: P.O. Box 4944 Diamond Bar, CA 91765

Tel: (909) 396-3385 www.aqmd.gov

Section A: Operator Information

1. Business Name of Operator To Appear On The Permit: Inland Empire Energy Center, LLC
2. Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD): 129816
3. Owner's Business Name (only if different from Business Name of Operator): N/A

Section B: Equipment Location

4. Equipment Location Address: For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site
26226 Antelope Road
Street Address
Romoland CA 92585
City State Zip Code
County: Los Angeles Orange San Bernardino Riverside
Contact Name: John Gates
Contact Title: H Systems Asset Mang. Phone: (951) 928-6905
Fax: (866) 210-6953 E-Mail: John.Gates@ge.com

Section C: Permit Mailing Address

5. Permit and Correspondence Information:
[ ] Check here if same as equipment location address
PO Box 1240, 26226 Antelope Road
Street Address
Romoland CA 92585
City State Zip Code
Contact Name: John Gates
Contact Title: H Systems Asset Mang. Phone: (951) 928-6905
Fax: (866) 210-6953 E-Mail: John.Gates@ge.com

Section D: Application Type The facility is in RECLAIM Title V RECLAIM & Title V Program (please check if applicable)

6. Reason for Submitting Application (Select only ONE):
New Construction (Permit to Construct)
Equipment Operating Without A Permit or Expired Permit\*
Administrative Change
Equipment On-Site But Not Constructed or Operational
Title V Application (Initial, Revisions, Modifications, etc.)
Compliance Plan
Facility Permit Amendment
Registration/Certification
Streamlined Standard Permit
Permitted Equipment Altered/ Modified Without Permit Approval\*
Proposed Alteration/Modification to Permitted Equipment
Change of Condition For Permit To Operate
Change of Condition For Permit To Construct
Change of Location—Moving to New Site
Existing Or Previous Permit/Application Number:
7. Estimated Start Date of Operation/Construction (MM/DD/YYYY):
8. Description of Equipment: Minor change to Title V permit.
9. Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction?
10. For identical equipment, how many additional applications are being submitted with this application?
11. Are you a Small Business as per AQMD's Rule 102 definition?
12. Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment?

Section E: Facility Business Information

13. What type of business is being conducted at this equipment location? Power Plant
14. What is your business primary NAICS Code (North American Industrial Classification System)? 4911
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?
16. Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location?

Section F: Authorization/Signature I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official: [Signature]
18. Title: H Systems Asset Mang.
19. Print Name: John Gates
20. Date: 2/28 March 08
Check List:
[X] Form(s) signed and dated by authorized official
[X] CEQA Form (400-CEQA) attached
[X] Payment for permit processing fee attached
Your application will be rejected if any of the above items are missing.

Table with columns: AQMD USE ONLY, APPLICATION/TRACKING #, TYPE B C D, EQUIPMENT CATEGORY CODE, FEE SCHEDULE, VALIDATION, ENG. A R, DATE, CLASS I III IV, ASSIGNMENT Unit Engineer, CHECK/MONEY ORDER #, AMOUNT \$, Tracking #



# EXPRESS PERMIT PROCESSING REQUEST FORM FORM 400 - XPP

Form 400-A, Form 400-CEQA and one or more 400-E-xx form(s) must accompany all submittals.

**Print Form**

## Section I - Facility/Application Information

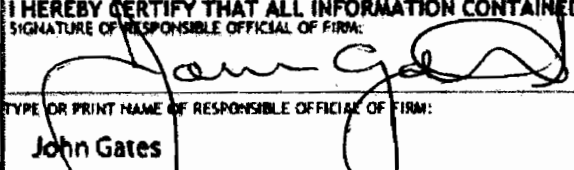
1. Business Name: Inland Empire Energy Center, LLC Facility ID: 129,816

2. The requested application is for a(n): Date of Occurrence: \_\_\_\_\_
- a.  New Construction
  - b.  Change of Location
  - c.  Modification of Equipment/Process
  - d.  Existing Equipment with Expired Permit
  - e.  Existing Equipment Operating without a Permit; Initial Operation Date: \_\_\_\_\_
  - f.  Change of Condition(s); specify the change of condition(s) requested: \_\_\_\_\_
  - g.  Change of Operator; List previous name of operator and Facility ID #: \_\_\_\_\_


- 3. I hereby request Express Permit Processing for this application.
- 4. I understand that this request will incur additional fees.
- 5. This request is not cancelable once engineering review has been initiated.
- 6. Express Permit Processing neither guarantees action by any specific date nor does I guarantee permit approval.

## Section II - Equipment Information

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT.

SIGNATURE OF RESPONSIBLE OFFICIAL OF FIRM:  TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL OF FIRM: <u>John Gates</u>	TITLE OF RESPONSIBLE OFFICIAL OF FIRM: <u>H Systems Asset Mang.</u> RESPONSIBLE OFFICIAL'S TELEPHONE NUMBER: <u>(951) 928-6905</u> DATE SIGNED: <u>21st March 08</u>
---	--

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT.

SIGNATURE OF PREPARER:  TYPE OR PRINT NAME OF PREPARER: <u>Tom Andrews</u>	TITLE OF PREPARER: <u>Senior Engineer</u> PREPARER'S TELEPHONE NUMBER: <u>(916) 444-6666</u> DATE SIGNED: _____
---	---

APPLY ONLY		APPLICATION/TRACKING #	PROJECT #	TYPE B C D	EQUIPMENT CATEGORY CODE: /	FEE SCHEDULE: \$	VALIDATION
ENG. A R DATE	ENG. A R DATE	CLASS I III IV	ASSIGNMENT UNIT	ENGINEER	ENF. SECT.	CHECK/MONEY ORDER #	AMOUNT \$



The SCAQMD is required by state law, the California Environmental Quality Act (CEQA), to review discretionary permit project applications for potential air quality and other environmental impacts. This form is a screening tool to assist the SCAQMD in clarifying whether or not the project has the potential to generate significant adverse environmental impacts that might require preparation of a CEQA document [CEQA Guidelines §15060(a)].<sup>2</sup> Refer to the attached instructions for guidance in completing this form.<sup>3</sup> For each Form 400-A application, also complete and submit one Form 400-CEQA. If submitting multiple Form 400-A applications for the same project at the same time, only one 400-CEQA form is necessary for the entire project. If you need assistance completing this form, contact Lori Inga at (909) 396-3109.

**FACILITY INFORMATION**

Business Name of Operator to Appear on the Permit:

Facility ID (6 Digit):

Inland Empire Energy Center, LLC

129816

Project Description:

Power Plant

**REVIEW FOR EXEMPTION FROM FURTHER CEQA ACTION**

Check "Yes" or "No" as applicable

	Yes	No	Is this application for:
A.	<input checked="" type="radio"/>	<input type="radio"/>	A CEQA and/or NEPA document previously or currently prepared that specifically evaluates this project? If yes, a permit cannot be issued until a Final CEQA document and Notice of Determination is submitted.
B.	<input type="radio"/>	<input type="radio"/>	A request for a change of permittee only (without equipment modifications)?
C.	<input type="radio"/>	<input type="radio"/>	Equipment certification or equipment registration (qualifies for Rule 222)?
D.	<input type="radio"/>	<input type="radio"/>	A functionally identical permit unit replacement with no increase in rating or emissions?
E.	<input type="radio"/>	<input type="radio"/>	A change of daily VOC permit limit to a monthly VOC permit limit?
F.	<input type="radio"/>	<input type="radio"/>	Equipment damaged as a result of a disaster during state of emergency?
G.	<input type="radio"/>	<input type="radio"/>	A Title V (i.e., Regulation XXX) permit renewal (without equipment modifications)?
H.	<input type="radio"/>	<input type="radio"/>	A Title V administrative permit revision?
I.	<input type="radio"/>	<input type="radio"/>	The conversion of an existing permit into an initial Title V permit?

If "Yes" is checked for any question above, your application does not require additional evaluation for CEQA applicability. Skip to page 2, "SIGNATURES" and sign and date this form.

**REVIEW OF IMPACTS WHICH MAY TRIGGER CEQA**

Complete Sections I-VI by checking "Yes" or "No" as applicable. To avoid delays in processing your application(s), explain all "Yes" responses on a separate sheet and attach it to this form.

	Yes	No	Section I - General
1.	<input type="radio"/>	<input type="radio"/>	Has this project generated any known public controversy regarding potential adverse impacts that may be generated by the project? <small>Controversy may be construed as concerns raised by local groups at public meetings; adverse media attention such as negative articles in newspapers or other periodical publications, local news programs, environmental justice issues, etc.</small>
2.	<input type="radio"/>	<input type="radio"/>	Is this project part of a larger project?
<b>Section II - Air Quality</b>			
3.	<input type="radio"/>	<input type="radio"/>	Will there be any demolition, excavating, and/or grading construction activities that encompass an area exceeding 20,000 square feet?
4.	<input type="radio"/>	<input type="radio"/>	Does this project include the open outdoor storage of dry bulk solid materials that could generate dust? If Yes, include a plot plan with the application package.

<sup>1</sup> A "project" means the whole of an action which has a potential for resulting in physical change to the environment, including construction activities, clearing or grading of land, improvements to existing structures, and activities or equipment involving the issuance of a permit. For example, a project might include installation of a new, or modification of an existing internal combustion engine, dry-cleaning facility, boiler, gas turbine, spray coating booth, solvent cleaning tank, etc.

<sup>2</sup> To download the CEQA guidelines, visit [http://ceres.ca.gov/env\\_law/state.html](http://ceres.ca.gov/env_law/state.html).

<sup>3</sup> To download this form and the instructions, visit <http://www.scaqmd.gov/ceqa> or <http://www.scaqmd.gov/permit>

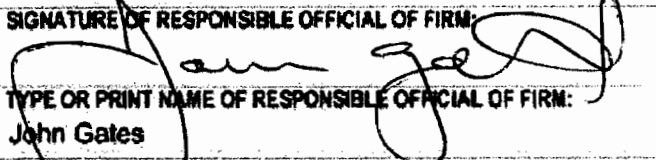

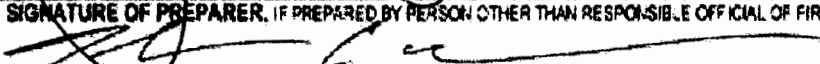


	Yes	No	
5.	<input type="radio"/>	<input type="radio"/>	<p>Would this project result in noticeable off-site odors from activities that may not be subject to SCAQMD permit requirements?</p> <p>For example, compost materials or other types of greenwaste (i.e., lawn clippings, tree trimmings, etc.) have the potential to generate odor complaints subject to Rule 402 - Nuisance.</p>
6.	<input type="radio"/>	<input type="radio"/>	Does this project cause an increase of emissions from marine vessels, trains and/or airplanes?
7.	<input type="radio"/>	<input type="radio"/>	Will the proposed project increase the QUANTITY of hazardous materials stored aboveground onsite or transported by mobile vehicle to or from the site by greater than or equal to the amounts associated with each compound on the attached Table 1? <sup>4</sup>
<b>Section III - Water Resources</b>			
8.	<input type="radio"/>	<input type="radio"/>	<p>Will the project increase demand for water at the facility by more than 5,000,000 gallons per day?</p> <p>The following examples identify some, but not all, types of projects that may result in a "yes" answer to this question: 1) projects that generate steam; 2) projects that use water as part of the air pollution control equipment; 3) projects that require water as part of the production process; 4) projects that require new or expansion of existing sewage treatment facilities; 5) projects where water demand exceeds the capacity of the local water purveyor to supply sufficient water for the project; and 6) projects that require new or expansion of existing water supply facilities.</p>
9.	<input type="radio"/>	<input type="radio"/>	<p>Will the project require construction of new water conveyance infrastructure?</p> <p>Examples of such projects are when water demands exceed the capacity of the local water purveyor to supply sufficient water for the project, or require new or modified sewage treatment facilities such that the project requires new water lines, sewage lines, sewage hook-ups, etc.</p>
<b>Section IV - Transportation/Circulation</b>			
10.			Will the project result in (Check all that apply):
	<input type="radio"/>	<input type="radio"/>	a. the need for more than 350 new employees?
	<input type="radio"/>	<input type="radio"/>	b. an increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round-trips per day?
	<input type="radio"/>	<input type="radio"/>	c. increase customer traffic by more than 700 visits per day?
<b>Section V - Noise</b>			
11.	<input type="radio"/>	<input type="radio"/>	Will the project include equipment that will generate noise GREATER THAN 90 decibels (dB) at the property line?
<b>Section VI - Public Services</b>			
12.			Will the project create a permanent need for new or additional public services in any of the following areas (Check all that apply):
	<input type="radio"/>	<input type="radio"/>	a. Solid waste disposal? Check "No" if the projected potential amount of wastes generated by the project is less than five tons per day.
	<input type="radio"/>	<input type="radio"/>	b. Hazardous waste disposal? Check "No" if the projected potential amount of hazardous wastes generated by the project is less than 42 cubic yards per day (or equivalent in pounds).

**"REMINDER: For each "Yes" checked in the sections above, attach all pertinent information including but not limited to estimated quantities, volumes, weights, etc."**

**SIGNATURES**

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT THIS FORM IS A SCREENING TOOL AND THAT THE SCAQMD RESERVES THE RIGHT TO CONSIDER OTHER PERTINENT INFORMATION IN DETERMINING CEQA APPLICABILITY.

SIGNATURE OF RESPONSIBLE OFFICIAL OF FIRM: 		TITLE OF RESPONSIBLE OFFICIAL OF FIRM: H Systems Asset Mang.	
TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL OF FIRM: John Gates		RESPONSIBLE OFFICIAL'S TELEPHONE NUMBER: (951) 9286-905	DATE Signed: 2/18/12 
SIGNATURE OF PREPARER, IF PREPARED BY PERSON OTHER THAN RESPONSIBLE OFFICIAL OF FIRM: 		TITLE OF PREPARER: Senior Engineer	
TYPE OR PRINT NAME OF PREPARER: Tom Andrews		PREPARER'S TELEPHONE NUMBER: (916) 4446-666	DATE Signed:

**THIS CONCLUDES FORM 400-CEQA. INCLUDE THIS FORM AND THE ATTACHMENTS WITH FORM 400-A.**

<sup>4</sup> Table 1 - Regulated Substances List and Threshold Quantities for Accidental Release Prevention can be found in the Instructions for Form 400-CEQA.