

DOCKETED

Docket Number:	12-AFC-02
Project Title:	Huntington Beach Energy Project
TN #:	200375
Document Title:	Correspondence re Air Quality relating to the AFC of the Huntington Beach Energy Project
Description:	N/A
Filer:	Tiffani Winter
Organization:	Stoel Rives, LLP
Submitter Role:	Applicant's Representative
Submission Date:	8/29/2013 3:59:05 PM
Docketed Date:	8/29/2013



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August 29, 2013

KIMBERLY J. HELLWIG
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VIA EMAIL

Ms. Felicia Miller, Siting Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Re: Huntington Beach Energy Project (12-AFC-02)
Correspondence Related to Air Quality (National Park Service & Forest Service)**

Dear Ms. Miller:

On behalf of Applicant AES Southland Development, LLC, please find enclosed herein for docketing correspondence regarding air quality as such relates to the Application for Certification for the Huntington Beach Energy Project.

Very truly yours,

A handwritten signature in blue ink that reads "Kim Hellwig".

Kimberly J. Hellwig
Energy & Environmental Policies Specialist

MAF:jmw
Enclosures
cc: Service List



File Code: 2580

Date: August 23, 2013

Chris Perri
Air Quality Engineer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

Dear Mr. Perri:

In evaluating PSD applications, Federal Land Managers (FLMs) responsible for Class I wilderness areas cooperate in providing common air quality modeling guidance and procedures for estimating impacts from stationary sources like this power plant. Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report - Revised (2010) is found to be applicable to this permit. FLAG Phase I provides for a simplified far field impact screening procedure for stationary sources greater than 50 km from Class I areas.

AES Huntington Beach, LLC plans to install 939 megawatts of natural gas electrical generating capacity within the foot print of an existing operating plant. The Huntington Beach Energy Project (HBEP) will consist of six air cooled Mitsubishi 501DA combustion turbine generators, with dry low-oxide Nitrogen Oxide combustors, evaporative inlet air coolers, fired heat recovery steam generators, selective catalytic reduction systems, oxidation catalyst systems, and two steam turbine generators.

Annual emissions from the facility (see table below tons/year) assumes each combustion turbine operates 5,900 hours at 100% load without duct burners and 470 hours with 100% duct burner firing, with 24 cold starts, 150 warm starts, 450 hot starts, and 624 shut downs.

Annualized 24-Hours Emissions		
Pollutant	Expected (tons/year) ^a	Maximum Potential (tons/year)
NOx	242	373
CO	277	460
VOC	131	221
SO2	13	58
PM 10/2.5	99	156
Sulfuric Acid	0.5	3
Sum NOx, SO2, PM10/2.5, and S-acid	355	590
Greenhouse Gases	3,141,167	N/A

^a Expected emissions are based on a modified operating profile controlling PM emissions to less than 100 tons/year



Three Forest Service Class I wildernesses lie within the standard 100km modeling range of HBEP, San Cucamonga (69km), Gabriel (70km) and Agua Tibia (91km). Based on past experience the FLM has determined that pollution loading of this magnitude at these distances can be considered negligible; and no further Air Quality Related Values (AQRV) analysis is required by the FLM.

Class I Area	Distance (kilometers)	Federal Land Manager
Cucamonga	69	USFS
San Gabriel	69.9	USFS
Agua Tibia	90.6	USFS
San Gorgonio	107.6	USFS
San Jacinto	114.2	USFS
Joshua Tree	145.4	NPS
San Rafael	192.3	USFS
Domeland	229.2	USFS

A minimum of Best Available Control Technology (BACT) is required by the FLM to protect the Class I area affected by this PSD application. During normal operations we feel that the proposed control measures required by the South Coast Air Quality Control District meet this BACT requirement.

All modeling of potential impacts follow Forest Service guidelines, which are conservative, favoring protection of the Class I wilderness.

In summary we do not anticipate any adverse AQRV impacts, including impacts on visibility, from this project in the San Gabriel, Cucamonga or Agua Tibia wildernesses.

Thank you for the opportunity to review this permit application and if you have any questions please contact Mike McCorison at (626) 574-5286.

Sincerely,



For THOMAS A. CONTRERAS
Forest Supervisor

cc: Trent Procter
Mike McCorison
Jerry.Salamy

From: Notar, John
To: Salamy, Jerry/SAC
Cc: tonnie_cummings@nps.gov; Don_Shepherd@nps.gov; John Notar
Subject: Re: AES Huntington Beach Energy Projects
Date: Wednesday, June 05, 2013 4:39:46 PM

Jerry: thanks for the information. The National Park Service will screen the AES Southland Development LLC (AES) on the Huntington Beach Energy Project (HBEP) located in Huntington Beach, California. for review for AORV impacts at Joshua Tree NP based on the Q/D value of 3.3. You may forward this to South Coast AQMD. Can you tell me the CO2 emissions, as I said we are just tracking greenhouse gas emissions. Please CC Don Shepherd with this information.

Thanks
John Notar

On Wed, Jun 5, 2013 at 5:26 PM, <Jerry.Salamy@ch2m.com> wrote:

John,

The 7.0 Q/D value is for the Cucamonga Wilderness Area (FS) which is 69 km from HBEP. The nearest NPS Class I area is Joshua Tree National Park at 145 km from HBEP. This would equate to a Q/D of 3.3 (483 TPY/145) for Joshua Tree.

Regarding BACT levels, we proposed the following:

2 ppm at 15% oxygen for NOx and CO

1 ppm at 15% oxygen for VOC

Low sulfur natural gas fuel for SO2 and PM/PM10/PM2.5

*Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919*

From: Notar, John [mailto:john_notar@nps.gov]
Sent: Wednesday, June 05, 2013 4:11 PM
To: Salamy, Jerry/SAC
Cc: tonnie_cummings@nps.gov; Don Shepherd; John Notar
Subject: Re: AES Huntington Beach Energy Projects

Jerry: thanks for getting back to me. Is 7.0 for the the closest NPS unit (not US Forest Service) you measured for? I assume the NOx emissions will be permitted at 2.0 ppm? Is that true? We are collecting information on controls on NG fired power plants.

thanks

John

John Notar
National Park Service
Air Resources Division
12795 W. Alameda Pkwy.
Lakewood, CO 80228
Phone: 303-969-2079
Fax: 303-969-2822
E-Mail: john_notar@nps.gov

On Wed, Jun 5, 2013 at 4:58 PM, <Jerry.Salamy@ch2m.com> wrote:

John,

From the application, we calculated the Q/D value using the FLAG 2010 guidance as 7.0.

*Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919*

From: Notar, John [mailto:john_notar@nps.gov]
Sent: Wednesday, June 05, 2013 3:53 PM
To: Salamy, Jerry/SAC
Cc: Tonnie Cummings; John Notar
Subject: Re: AES Huntington Beach Energy Projects

Jerry: as far as I can determine NPS has not seen the PSD application for this project.

Do you know what the Q/D value is greater than 10.0?

In the FLM's FLAG 2010 guidance it describes the Q/D calculation. If the Q/D is less than 10.0 NPS usually screens the project out for AQRV analyses. Q is the sum of emissions based on the maximum permitted 24-hour emission rates of

SO₂, SO₄, NO_x, all species of PM-coarse, fine, condensables and elemental carbon. Convert the 24 hour summed emissions into a total tons per year and then divide (D) distance in kilometers.

Before you email or hard mail the application can you get back to me with the Q/D value .

Our email can accept 10 mb size files. If this is too small you can mail it to me at the address below.

thanks

John Notar

On Wed, Jun 5, 2013 at 4:27 PM, <Jerry.Salamy@ch2m.com> wrote:

Mr. Notar,

I am working with the AES Southland Development LLC (AES) on the Huntington Beach Energy Project (HBEP) located in Huntington Beach, California. AES submitted PSD permit application for HBEP to the South Coast Air Quality Management District (District) in June 2012 and EPA Region 9 in September 2012 (the EPA has subsequently delegated PSD review to the District in January 2013). The District deemed AES's PSD permit application conditionally complete in July 2012, pending receipt of additional data. Per District Rule 1703, the South Coast Air Quality Management District is required to provide a copy of the complete application (within 10 days after being deemed complete by the District) to the EPA, the Federal Land Manager for any Class I area located within 100 km of the source, and to the federal official charged with direct responsibility for management of any lands within the Class I area. The project site has several Class I areas within the 100 km. Therefore, the purpose of this email is determine if the National Park Service has received a copy of HBEP's PSD application for review and to provide any materials the Service needs to assess project impacts on federal lands.

As a note, I will also be contacting Mr. McCorison at the Forest Service with a similar request.

Please email or call with any questions you may have.

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919



**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
PROOF OF SERVICE
(Revised 07/18/2013)**

SERVICE LIST:

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**OTHER ENERGY COMMISSION
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*After docketing, the Docket Unit
will provide a copy to the persons
listed below. Do not send copies of
documents to these persons unless
specifically directed to do so.*

ANDREW McALLISTER
Commissioner and Presiding Member

KAREN DOUGLAS
Commissioner and Associate Member

Susan Cochran
Hearing Adviser

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Adviser to Commissioner McAllister

Patrick Saxton
Adviser to Commissioner McAllister

Galen Lemei
Adviser to Commissioner Douglas

Jennifer Nelson
Adviser to Commissioner Douglas

Eileen Allen
Commissioners' Technical
Adviser for Facility Siting

DECLARATION OF SERVICE

I, Kimberly J. Hellwig, declare that on August 29, 2013, I served and filed copies of the attached Applicant's Air Quality Correspondence (National Park Service & Forest Service). This document is accompanied by the most recent Proof of Service, which I copied from 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 on the Service List above in the following manner:

(Check one)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

- I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; **OR**
- Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: August 29, 2013



Kimberly J. Hellwig