

Comments of the MDAQMD PDOC for the Mojave Solar One Project

March 4, 2010

Comment #1

Section 12 (Permit Conditions)
HTF Ullage/Expansion System

The Applicant notes that virtually none of these types of conditions were proposed or placed on the recently issued PDOC for the Genesis Solar project, i.e., a solar project of similar design, size, and technology. We believe that the District should be consistent to the greatest extent possible in writing permit conditions for the various solar facilities. We are requesting that the conditions delineated in item 9, be revised to reflect the same level of stringency as those imposed on the Genesis Solar project (PDOC issued 2-18-2010).

Because of the extreme expansive nature of HTF, the use of automatic pressure sensing equipment to monitor ruptures or spills would produce false signals during a day when clouds are present. The applicant is proposing an alternative method for spill/rupture detection.

Comment #2

Section 12 (Permit Conditions)
Cooling Tower Conditions

The applicant is requesting that condition 4 be revised to read as follows:
“The operator shall perform weekly specific conductivity tests of the blow-down water to indirectly measure total dissolved solids (TDS). Quarterly tests of the blow-down water will be done to confirm the relationship between conductance and TDS. The TDS shall not exceed 9,968 ppm on a calendar monthly basis.”

The applicant would request that the 16 hour per day restriction be removed to reflect 24-hours per day during which maintenance activities may occur.

Comment #3

Section 12 (Permit Conditions)
Emergency Generator Conditions

The Applicant is requesting that Conditions 4, 6, and 7 be amended to read as follows. The proposed language describes the use of the emergency generator sets in the context of the solar facility operations.

Condition 4. This unit shall be limited to use for emergency power, defined as in response to a fire or when utility back-feed power is not available. In addition, this unit shall be operated no more than 50 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward the 50 hour per year limit.

Condition 6. This unit shall not be used to provide power to the interconnecting utility and shall be isolated from the interconnecting utility when operating.

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Condition 7. This engine may operate in response to notification of impending loss of utility back-feed power if the interconnected utility has ordered an outage to the plant or expects to order such outages at a particular time, the engine is operated no more than 30 minutes prior to the forecasted outage, and the engine is shut down immediately after the utility advises that the outage is no longer imminent or in effect.

Comment #4

Section 4.0 Control Technology Evaluation/BACT Determination

The applicant questions the basis for the AQMD assertion that the proposed IC engines trigger BACT. The AQMD has made the assumption that the four (4) engines are all operated on the same day which is not the case. The AFC document as well as the responses to comments indicates that multiple engines will not be operated on the same calendar day. The short term modeling and health impacts for the engines are based on this premise, and as such, the AQMD should evaluate the daily emissions based upon this assumption, and place an appropriate condition in the ATC to achieve this outcome. The applicant suggests that a condition be added to the PDOC analysis for the engines to limit daily operations as follows:

“This condition applies to the four (4) proposed IC engines, i.e., the two (2) emergency generator engines, and the two (2) fire pump system engines. Multiple engines will not be readiness tested on the same calendar day. No more than one (1) of the four (4) engines will be allowed to be readiness tested on any discrete calendar day.