

DOCKET

09-AFC-6

DATE AUG 16 2010

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August 16, 2010

Alan Solomon
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: **Blythe Solar Power Project, Docket No. 09-AFC-6**
Section: Air Quality

Dear Mr. Solomon:

Please find attached Final Determination of Compliance for the Blythe Solar Power Project.

If you have any questions on this submittal, please feel free to contact me directly.

Sincerely,



Alice Harron
Senior Director, Development

August 14, 2010

Roseana Navarro-Brasington
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, California 92392-2310

Re: Final Determination of Compliance for the Blythe Solar Power Project

Dear Ms. Navarro-Brasington,

On behalf of Palo Verde Solar I, LLC, Solar Millennium LLC has reviewed the Final Determination of Compliance (FDOC) published on July 8, 2010. We understand that the FDOC was released for public comment due to substantive changes relative to the PDOC. Overall, we are very pleased with the progress made on the FDOC and have only a few minor comments.

We submit these comments with the understanding that minor changes such as these will not trigger re-noticing, reissuance, or otherwise delay the issuance of the FDOC. If these comments and recommendations would delay the issuance of the FDOC in any way, please disregard them.

Ullage System Condition 5

Condition 5 requires an inspection and maintenance program. Subsection (e) of that condition states: “[I]f any evidence of a potential leak is found the indication of the potential leak shall be eliminated within 7 calendar days of detection.” Because the instruments used to monitor leaks are very sensitive and can detect background concentrations of VOC in the ambient air, Solar Millennium requests that this subsection be modified to define the concentration that would constitute a leak requiring repair. We propose that the definition of leaks provided in SCAQMD Rule 1173 (see Table 2 of that rule) be used, where a leak is defined to be 100 ppm for heavy liquids. Accordingly, we recommend that 5(e) be modified as shown below, with additional text shown using underline font and deleted text shown using ~~strikethrough~~ font:

- e. ~~If any evidence of a potential leak~~ of greater than 100 ppm above background is found, the ~~indication of the potential leak~~ leaking component shall be eliminated repaired, replaced or removed within 7 calendar days of detection.

Ullage System Condition 9

We understand that CEC intends to request an addition to Condition 9 to add an emission limit of 0.75 pounds per day for benzene. During a recent CEC-sponsored public workshop for the Project, Solar Millennium suggested to the CEC that our information suggests that the benzene concentration in the ullage vent emissions could be in excess of 99 percent. Because the HRA for the Project demonstrates no significant risks from project emissions to any receptor when a benzene emission rate from each ullage system of 1.5 pounds per day is assumed, we ask that if a benzene limit is added to condition 9, the limit be 1.5 pounds per day, verified by annual compliance test.

Ullage System Condition 10

Solar Millennium requests a minor change to this condition to ensure that the intention of the condition is clear, and that a new source review requirement or new source performance standard won't be inappropriately applied to the facility retroactively. The recommended change is shown below:

10. If current non-criteria substances become regulated as toxic or hazardous substances and are used in this equipment, the owner/operator (o/o) shall submit to the District a plan demonstrating how compliance will be achieved and maintained with such applicable regulations.

Closing

We appreciate your consideration of these comments. If you wish to discuss any of these comments, please contact Russ Kingsley at AECOM at (805)388-3775.

Sincerely,



Alice Harron
Sr. Director, Development and Permitting
harron@solarmillennium.com

**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:
APPLICATION FOR CERTIFICATION
for the *BLYTHE SOLAR POWER PROJECT*

Docket No. 09-AFC-6
PROOF OF SERVICE
(Revised 8/5/10)

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*indicates change

DECLARATION OF SERVICE

I, Carl Lindner, declare that on August 16, 2010, I served and filed copies of the attached Final Determination of Compliance for the Blythe Solar Power Project.

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:
[\[http://www.energy.ca.gov/sitingcases/solar_millennium_blythe\]](http://www.energy.ca.gov/sitingcases/solar_millennium_blythe).

The document has been sent to 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:

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery;
- by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person serviced, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing in that date to those addressed **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

- 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, along with 13 CDs, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 09-AFC-6
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

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


