

DOCKET
09-AFC-6

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March 3, 2010

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

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

Comments on Preliminary Decision/Determination of Compliance for the Blythe Solar Power Project
Technical Area: Air Quality

Dear Mr. Solomon:

Attached please find the comments to the Preliminary Decision/Determinations of Compliance (PDOC) that the Mojave Desert Air Quality Management District (MDAQMD or District) proposes to issue to the Blythe Solar Power Project (BSPP).

This correspondence provides specific comments related to the individual sections of the PDOC, arranged using the same section numbering shown in the PDOC., as submitted.

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

Sincerely,



Alice Harron
Senior Director, Development

February 26, 2010

Mr. Elson Heaston
Executive Director
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392

Subject: Comments on Preliminary Decision/Determination of Compliance for the Blythe Solar Power Project

Dear Mr. Heaston,

On behalf of Palo Verde Solar I, LLC, Solar Millennium, LLC has reviewed the Preliminary Decision/Determinations of Compliance (PDOC) that the Mojave Desert Air Quality Management District (MDAQMD or District) proposes to issue to the Blythe Solar Power Project (BSPP). Overall we are pleased with the first draft of the PDOC and have very few comments. However, we believe that revisions and clarifications are appropriate in several instances.

This correspondence provides specific comments related to the individual sections of the PDOC, arranged using the same section numbering shown in the PDOC. The requested revisions are illustrated using underline format for additional language and ~~strikethrough~~ format for text that should be deleted.

List of Abbreviations

The following acronyms are not used in the PDOC and are not applicable to the BSPP. These acronyms need to be deleted from the acronym list:

- ~~AVAQMD,~~
- ~~CEMS,~~
- ~~CERMS,~~
- ~~CTG,~~
- ~~HDPP,~~
- ~~HRSG,~~
- ~~RSP,~~
- ~~SCAQMD,~~
- ~~SJVAPCD,~~
- ~~SCLA,~~
- ~~SCR,~~ and
- ~~TOG.~~

1.0 Introduction

On January 26, 2010 the Applicant sent a letter responding to request for information to the District. That letter contained an error describing the Applicant and ownership structure. To clarify, Solar Millennium, LLC and Chevron Energy Solutions, originally proposed to construct, own and operate the BSPP as two separate facilities; however, the Applicant is now requesting that CEC issue one license to a project-

specific company known as Palo Verde Solar I, LLC (PVSI). PVSI is a wholly owned subsidiary of Solar Millennium and is the single applicant for the BSPP. PVSI will own and operate all four power block units of BSPP; the PDOC should be revised to reflect this change of ownership and operation. CES and Solar Millennium LLC have a development agreement relating to the development of the BSPP. The footer of the PDOC should be modified to reflect this requested change, i.e., the footer should read:

BSPP – PVSI Chevron Energy Solutions.

2.0 Project Location

No comments.

3.0 Description of Project

In paragraph 1 of this section (page 1, paragraph 4), the last sentence should be stricken. As noted above, PVSI will own and operate all four solar units of the BSPP. The modified text is shown below:

The proposed facility will consist of four 250 MW (gross) solar units. The Project uses parabolic trough solar thermal technology to generate electricity. In each power generating unit or power block, the proposed technology uses a steam turbine generator (STG) fed from a solar steam generator (SSG). SSGs receive heat transfer fluid (HTF) from solar thermal equipment comprised of arrays of parabolic mirrors that collect energy from the sun. ~~Chevron will own and operate two power block units and Solar Millennium will own and operate two power block units.~~

In paragraph 4 of this section (page 2, paragraph 5, (the bullet point list of equipment), PVSI will be installing four (4) of each listed devices. In addition, the description for the HTF expansion tanks and ullage system does not accurately convey the equipment that will be installed. For each power block, there will be one ullage system comprised of a number of tanks, pressure vessels, heat exchangers and flash distillation columns; the carbon adsorption system is associated with the ullage system vent. While the ullage system and HTF expansion / overflow tanks are hard-piped together, they are two separate subsystems of the HTF loop. For each power block there will be one HTF expansion tank and multiple HTF overflow tanks. However, under normal operating conditions the expansion tanks and overflow tanks are closed, pressurized vessels, with no emissions to atmosphere, and consequently, do not need to be listed as emissions units on this PDOC. Suggested changes are shown below:

~~Chevron Energy Solutions~~ PVSI is proposing to install:

- ~~two (2)~~ four (4) Tier III diesel fueled emergency fire pump engines rated at 300 hp
- ~~two (2)~~ four (4) Tier II diesel fueled emergency generator set rated at 2,922 hp
- ~~two (2)~~ four (4) auxiliary natural gas fired boilers each rated at - 35 MMBtu/hr
- ~~two (2)~~ four (4) HTF natural gas fired heaters for freeze protection each rated at - 35 MMBtu/hr
- ~~two (2)~~ four (4) HTF ullage ~~systems~~ expansion tanks with carbon adsorption systems
- ~~two (2)~~ four (4) cooling towers each with drift eliminator

In the list of equipment specifications that follows paragraph 5 of this section, the number of devices should be changed from 2 to 4 in each case.

4.0 Overall Project Emissions

(Note: The Section header for “Overall Project Emissions” is not shown as Section 4; however, it appears as though it should have been. It is shown as Section 4 herein to maintain the numbering convention for the remainder of the sections.)

On page 4 of the PDOC, MDAQMD states that the Heat Transfer Fluid (HTF) freeze protection heaters have permitted emission limits based on fuel usage; however the permit conditions for the HTF heater do not have limits on fuel usage and instead limit the hours of operation. The sentence starting on line 11 of the Overall Project Emissions paragraph should be changed to reflect the limitations on the hours of operation:

Project emissions limited by permit condition based on fuel usage for the auxiliary boilers and ~~HTF freeze protection heaters~~ and by hours of operation for the HTF freeze protection heaters and emergency generator and fire pump internal combustion engines.

Maximum Annual Emissions – Table 1

The emissions presented in Table 1 do not match the emissions presented in Appendix A. These emission values should match the numbers presented in Table A-1 of the Appendix and also need to be changed to reflect the operation of all four power block units. Based on the calculations in the Application for Certification (AFC) and the in the letter entitled: “Modifications to the Air Permit Applications for the BSPP,” dated January 26, 2010, Table 1 should read:

Table 1 – BSPP Solar Millennium Maximum Annual Operational Emissions				
(All emissions presented in tons per year – two <u>four</u> power block units, VOC fugitive emissions included)				
NOx	SOx	CO	PM10	VOC
2.155 <u>4.78</u>	0.719 <u>0.04</u>	3.016 <u>7.48</u>	1.745 <u>1.82</u>	2.352 <u>4.70</u>

Maximum Daily Emissions – Table 2

The emissions presented in Table 2 do not match the emissions presented in Appendix A. These emission values should also match the number presented in Table A-1 of the Appendix and need to be changed to reflect PVSI’s operation of all four power block units. Based on our calculations Table 2 should read:

Table 2 – BSPP Solar Millennium Maximum Daily Operational Emissions				
(All emissions presented in pounds per day– two <u>four</u> power block units, VOC fugitive emissions included)				
NOx	SOx	CO	PM10	VOC
65.388 <u>149.42</u>	48.264 <u>0.74</u>	44.763 <u>156.99</u>	25.343 <u>28.24</u>	20.545 <u>41.11</u>

5.0 Control Technology Evaluation/BACT Determination

BACT Thresholds and Project Trigger

The first paragraph of Section 5, Control Technology Evaluation/BACT Determination states that the internal engines have the potential to emit more than 25 pounds per day of NOx. Based on emissions calculations, only the emergency generator engines have the potential to emit more than 25 pounds per day of NOx. The last sentence should read:

Based on the proposed project's maximum emissions as calculated in §4 above, the project triggers only BACT for the proposed emergency generator ~~internal combustion~~ engines, which have the potential to emit more than 25 pounds per day of NOx.

Proposed Limit for each Carbon Adsorption System (Expansion Tank/Ullage Vent System)

The control efficiency for carbon adsorption presented in the table is unclear. BSPP plans to use a two-stage carbon adsorption system, and each stage provides at least 85 percent control. This yields an overall control efficiency of 98 percent. BSPP did not propose to use a condenser.

Pollutant	Control
VOC	Control adsorption with at least 85% control efficiency <u>for one stage</u> .
NOx, SOx, CO, PM	Not applicable

The proposed 2 stage ~~condenser~~/carbon adsorption system meets presumptive MACT and provides for 98% control of VOC emissions. VOC emissions from the system will not exceed 1.5 lb/day from each of the four proposed vents.

Proposed Limit for Each Cooling Tower

The PDOC states: "[T]he facility will be required to have a functional hydrocarbon detection device and to repair leaks in a timely manner". A hydrocarbon detector was not proposed by the applicant and use of such a device is not warranted in this situation. Hydrocarbon leaks into a cooling water system may occur in a high pressure heat exchanger, but are not expected to occur in the low pressure exchangers proposed for the Project. Further, should a leak occur, the oil that would enter the cooling water loop has a negligible vapor pressure and is would not volatilize from the cooling tower. Thus a hydrocarbon detector should not be required for the Project, and we request that this statement be removed from the BACT section, as follows:

The proposed cooling towers will have drift eliminators with vendor-guaranteed PM control efficiency of 0.0005%). ~~The facility will be required to have a functional hydrocarbon detection device and to repair leaks in a timely manner.~~ The proposed cooling towers meet the above requirements.

BACT for each Internal Combustion Engine – Emergency Generator and Fire Pump (Total of eight engines)

Compliance with the NSPS and ATCM is determined to be BACT for the fire pump and emergency generator engines and is found to be an engine meeting the current tier requirements. The proposed engines meet this requirement, but the emissions limits presented in the Table in the PDOC are incorrect

for the emergency generator. The emission factors and corresponding emissions calculations need to be revised to reflect the appropriate Tier II standards for the emergency generator engine as shown in the Table below.

Proposed Engine – Fire Pump	NOx + NMHC (g/bhp-hr)	PM (g/bhp-hr)	CO (g/bhp-hr)	SOx
300 hp Tier III	3.0	0.15	2.6	15 ppm S fuel
Proposed Engine – Emergency Generator	NOx + NMHC (g/bhp-hr)	PM (g/bhp-hr)	CO (g/bhp-hr)	SOx
2,922 hp Tier II	4.0 <u>4.8</u>	0.07 <u>0.15</u>	0.37 <u>2.6</u>	15 ppm S fuel

6.0 PSD Class I Area Protection

No comments.

7.0 Air Quality Impacts Analysis

No comments.

8.0 Health Risk Assessment and Toxics New Source Review

No comments.

9.0 Offset Requirement

The emissions presented in Table 5 do not match the emissions presented in the PDOC Appendix. These emission values should also match the number presented in Table 1 of the PDOC and need to be changed to reflect the ownership of all four power block units. Based on our calculations Table 5 should read:

All emission in tons per year				
	NOx	VOC	SOx	PM10
Maximum Annual Potential to Emit	2 <u>4.78</u>	4 <u>4.70</u>	0 <u>0.04</u>	4 <u>42.77</u>
Offset Threshold	25	25	25	15

10.0 Applicable Regulations and Compliance Analysis

The rule compliance for rule 1302 needs to be changed to reference the MDAQMD; BSPP is not under the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD). Please revise the compliance method of Rule 1302 to read:

“Rule 1302 - Procedure requires certification of compliance with the Federal Clean Air Act, applicable implementation plans, and all applicable ~~AVAQMD~~ MDAQMD rules and regulations.”

11.0 Conclusion

No comments.

12.0 Permit Conditions

Each of the subsections within this section has listed the number of devices and application numbers for those devices in italics. In each case, because the PDOC refers to only one-half of the Project, two devices are listed and only two application numbers are listed. When the District combines the Chevron PDOC with the Solar Millennium PDOC into a single PDOC for PVSI, we ask that the number of units changed to four and all four application numbers be listed.

Auxiliary Boilers Authority to Construct Conditions

Condition 4(a)(2) contains a typographical error related to boiler load. Conditions 4(d) and 4(e) present higher emission factors for SOx and PM10 than the emission factors presented in the AFC. The SOx emission estimates should be based on 0.2 grains (gr) of sulfur per 100 standard cubic feet (scf) of natural gas, and the PM10 emissions should be calculated based on a vendor guaranteed emission factor of 0.01 lb/MMBtu. Based on these recommended changes, Condition 4 should be revised as follows:

4. Emissions from this equipment shall not exceed the following hourly emission limits at any firing rate, verified by fuel use and compliance tests:
 - a. NOx as NO₂:
 1. 0.389 lb/hr operating at 100% load (based on 9.0 ppmvd corrected to 3% O₂ and averaged over one hour)
 2. 0.097 lb/hr operating at ~~400%~~ 25% load (based on 9.0 ppmvd corrected to 3% O₂ averaged over one hour)
 - b. CO:
 1. 1.322 lb/hr operating at 100% load (based on 50 ppmvd corrected to 3% O₂ and averaged over one hour)
 2. 0.331 operating at 25% load (based on 50 ppmvd corrected to 3% O₂ and averaged over one hour)
 - c. VOC as CH₄:
 1. 0.175 lb/hr operating at 100% load
 2. 0.044 lb/hr operating at 25% load
 - d. SOx as SO₂:
 1. ~~0.483~~ 0.010 lb/hr operating at 100% load
 2. ~~0.046~~ 0.0024 lb/hr operating at 25% load
 - e. PM10:
 1. ~~0.700~~ 0.0350 lb/hr operating at 100% load
 2. ~~0.175~~ 0.0875 lb/hr operating at 25% load

Condition 7 requires annual compliance tests for NOx, VOC and CO. An annual test for NOx and CO is understandable, as those pollutants have BACT limits; however, there is no regulatory reason to require annual testing for VOC. VOC has no BACT, rule or offset-driven emission limit. VOC emission estimates are based on commonly accepted emission factors; an annual compliance test would only serve to validate the factor, which should not be the responsibility of the Applicant. High VOC emissions would be an indication of incomplete combustion; however, excess CO is also an indicator of incomplete combustion and, as noted, the applicant has no objection to the CO test. That being said, we do understand and agree that an initial compliance test as required by Condition 8 is appropriate, and recommend that instead of annual VOC emission testing that a VOC compliance test should be required during the initial compliance test only. We request that the requirement for the annual compliance test for VOC be deleted from the Condition 7, and added to the initial compliance test in Condition 8, as shown below:

7. The o/o shall perform annual compliance tests on this equipment in accordance with the MDAQMD Compliance Test Procedural Manual. The test report shall be submitted to the District no later than six weeks prior to the expiration date of this permit. The following compliance tests are required:

- a. NOx as NO₂ in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Methods 19 and 20).
- ~~b. VOC as CH₄ in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Methods 25A and 18).~~
- eb. CO in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Method 10).
- ec. Flue gas flow rate in dscf per minute.

8. The o/o shall perform an initial compliance test on this equipment in accordance with the MDAQMD Compliance Test Procedural Manual within 180 days of initial start up. The test report shall be submitted to the District within 6 weeks of performance of the test. The initial compliance test shall be for all items listed in condition 7 above, in addition to:

- a. SOx as SO₂ in ppmvd at 3% oxygen and lb/hr.
- b. PM10 in mg/m at 3% oxygen and lb/hr (measured per USEPA Reference Methods 5 and 202 or CARB Method 5).
- c. VOC as CH₄ in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Methods 25A and 18).
- ed. Opacity (measured per USEPA reference Method 9).

HTF Heater Authority to Construct Conditions

Condition 4 lists hourly emission limits. There appears to be a minor (rounding?) error in the emission rate specified for NOx. The SOx emission estimates should be based on 0.2 grains (gr) of sulfur per 100 standard cubic feet (scf) of natural gas, and the PM10 emissions should be calculated based on a vendor guaranteed emission factor of 0.01 lb/MMBtu. Based on these recommended changes, Condition 4 should be revised as follows:

- 4. Emissions from this equipment shall not exceed the following hourly emission limits at any firing rate, verified by fuel use and annual compliance tests:
 - a. NOx as NO₂ ~~0.394~~ 0.389 lb/hr (based on 9.0 ppmvd corrected to 3% O₂ and averaged over one hour)
 - b. CO 1.322 lb/hr (based on 50 ppmvd corrected to 3% O₂ and averaged over one hour)

- c. VOC as CH₄ 0.175 lb/hr
- d. SOx as SO₂ ~~0.183~~ 0.010 lb/hr
- e. PM10 ~~0.700~~ 0.0350 lb/hr

Similar to the source test conditions for the boilers, Condition 7 for the heaters requires annual compliance tests for NOx, VOC and CO. An annual test for NOx and CO is understandable, as those pollutants have BACT limits; however, there is no regulatory reason to require annual testing for VOC. As discussed in relation to the boilers, VOC has no BACT, rule or offset-driven emission limit. VOC emission estimates are based on commonly accepted emission factors; an annual compliance test would only serve to validate the factor. High VOC emissions would be an indication of incomplete combustion; however, excess CO is also an indicator of incomplete combustion and, as noted, the applicant has no objection to the CO test. That being said, we do understand and agree that an initial compliance test as required by Condition 8 is appropriate, and recommend that instead of annual VOC emission testing that a VOC compliance test should be required during the initial compliance test only. We request that the requirement for the annual compliance test for VOC be deleted from the Condition 7, and added to the initial compliance test in Condition 8, as shown below:

7. The o/o shall perform annual compliance tests on this equipment in accordance with the MDAQMD Compliance Test Procedural Manual. The test report shall be submitted to the District no later than six weeks prior to the expiration date of this permit. The following compliance tests are required:

- a. NOx as NO₂ in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Methods 19 and 20).
- ~~b. VOC as CH₄ in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Methods 25A and 18).~~
- eb. CO in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Method 10).
- ec. Flue gas flow rate in dscf per minute.

8. The O/O shall perform an initial compliance test on this equipment in accordance with the MDAQMD Compliance Test Procedural Manual within 180 days of initial start up. The test report shall be submitted to the District within 6 weeks of performance of the test. The initial compliance test shall be for all items listed in condition 7 above, in addition to:

- a. SOx as SO₂ in ppmvd at 3% oxygen and lb/hr.
- b. PM10 in mg/m at 3% oxygen and lb/hr (measured per USEPA Reference Methods 5 and 202 or CARB Method 5).
- c. VOC as CH₄ in ppmvd at 3% oxygen and lb/hr (measured per USEPA Reference Methods 25A and 18).
- ed. Opacity (measured per USEPA reference Method 9).

Ullage Vent System Authority to Construct Conditions

As noted elsewhere, the Ullage system and the HTF expansion and overflow tanks are separate and distinct subsystems of the overall HTF loop, and not part of the same subsystem. The HTF expansion tanks and overflow vessels operate daily, separately and independently of the ullage system. Under normal operating conditions the expansion tanks and overflow tanks are closed, pressurized vessels, with no emissions to atmosphere, and consequently, do not need to be listed as emissions units on this PDOC. The ullage system operates periodically, usually only once or twice per week for a short period of

time, e.g., two hours. We request that this section of the PDOC be revised as follows to reflect the system design:

(Ullage ~~Vent~~ System) Authority to Construct Conditions

~~[Two~~Four - HTF ullage systems ~~expansion tank~~, Application Number: 0010750 and 0010757]

1. This ~~tank stores~~ system purifies HTF, specifically the condensable fraction of the vapors vented from the HTF expansion tank ~~ullage system~~.
2. This ~~tank~~ system must be properly maintained at all times.
3. This ~~tank~~ system shall be operated at all times with the carbon adsorption system under District permit [To be Determined].

Carbon Adsorption System Authority to Construct Conditions

As noted elsewhere, the Ullage system and the HTF expansion and overflow tanks are separate and distinct subsystems of the overall HTF loop, and not part of the same subsystem. We are requesting that the wording of several conditions assigned to the carbon adsorption system be modified to be consistent with the system design. Note that the conditions that do not require modification are not listed herein. In addition, although the Applicant anticipates that benzene may be emitted from the ullage system vent, a FID or PID monitoring device will not directly determine benzene concentration in the exhaust, and consequently, we ask that Condition 10 be modified to eliminate the requirement to monitor benzene.

2. This carbon adsorption system shall provide 98% control efficiency of VOC emissions vented from the HTF ullage ~~expansion tank~~ system under District Permit [to be determined].
5. This equipment must be in use and operating properly at all times the HTF ullage ~~expansion tank~~ system is venting.
10. Prior to January 31 of each new year, the o/o of this unit shall submit to the District a summary report of ~~all benzene and~~ VOC emissions (as hexane).

Cooling Tower Authority to Construct Conditions

Condition 4 for these emissions units places a limit of 2000 ppmv on the cooling tower blowdown on a "calendar monthly basis". We ask that the condition be reworded to clarify the basis for that requirement as an arithmetic average of all TDS tests conducted during the month, and ask that the basis of measurement be ppmw, not ppmv. The suggested modifications are listed below:

4. The operator shall perform weekly tests of the blow-down water total dissolved solids (TDS). The TDS shall not exceed 2000 ~~ppmv~~ ppmw based on an arithmetic average of all TDS measurements conducted each ~~a-calendar monthly basis~~. The operator shall maintain a log which contains the date and result of each blow-down water test in TDS ppm, and the resulting mass emission rate. This log shall be maintained on site for a minimum of five (5) years and shall be provided to District personnel on request.

13.0 Appendix – BSPP Emissions Calculations

The Applicant has made several comments that affect the emissions calculations in the Appendix. This section will not show the requested revisions using the ~~strike through~~/underline format; the recommended changes to the tables in the Appendix will be summarized and discussed in each section.

Table A-1

Table A-1 needs to be revised to reflect the new ownership of all four units of the BSPP by PVSI.

Table A-2

Several revisions need to be made to the calculations in Table A-2. As discussed in **Section 12** of this letter, the emissions calculations for SO_x and PM₁₀ appear to be based on incorrect emission factors. These emission factors should be revised in the calculations.

The Applicant has also identified a spreadsheet error in the daily and annual CO emissions. The CO emissions should be 7.648 lb/day, 2,161.25 lb/yr and 1.081 ton/yr. Please revise Table A-2 accordingly.

Table A-3

As discussed in **Section 12** of this letter, the emissions of SO_x and PM₁₀ appear to be based on incorrect emission factors. These emission factors should be revised in the calculations.

Table A-4

As discussed in **Section 5**, the emergency generator engines meet the BACT requirement by using Tier II engines, but the emission factors used the calculations are incorrect. The emission factors and corresponding emergency generator engine emissions need to be revised to reflect the appropriate Tier II standards.

Additionally, the SO_x emissions should be changed to reflect the use of ultra-low sulfur diesel. The AP-42 SO_x emission factor over-estimates emissions. CARB diesel fuel with 15 ppmw sulfur is required for Project operations; emission estimates should be consistent with that requirement.

Table A-5

The maximum daily PTE of the fire pump engine is incorrectly calculated for 24 hours of operation. The fire pump engine is an emergency engine that will only be used for one hour per week, not to exceed 50 hours per year, for maintenance and testing purposes. The emissions associated with emergency operation are not regulated by the ATCM or the MDAQMD rules and should not be included in calculations to determine facility rule compliance. Table A-5 should be revised to reflect maximum daily emissions from one hour of operation of the fire pump engine. The SO_x emissions should also be changed to reflect the use of ultra-low sulfur diesel.

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 1/26/2010)

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DECLARATION OF SERVICE

I, Carl Lindner, declare that on, March 3, 2010, I served and filed copies of the attached Blythe Solar Power Project Materials:

Comments on Preliminary Decision/Determination of Compliance for the Blythe Solar Power Project
Technical Area: Air Quality

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 or by overnight delivery service or depositing in the United States mail at Camarillo, California with postage or fees thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **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.


