

**South Coast Air Quality Management District's Comments  
Air Quality Supplemental Staff Assessment (October 26, 2010)  
Palen Solar Power Project**

<b>DOCKET</b>
<b>09-AFC-7</b>
DATE _____
RECD. <u>DEC 01 2010</u>

Page C.1-1, 2<sup>nd</sup> Paragraph, 2<sup>nd</sup> Bullet

The two ullage, expansion tank, ~~overflow tank~~, and HTF piping systems are now included as separate permit units and have 12 new permit conditions.

Page C.1-1, 4<sup>th</sup> Paragraph; Page C.1-2, 1<sup>st</sup> Paragraph; C.1-6 1<sup>st</sup> & 2<sup>nd</sup> Paragraphs

These paragraphs include statements regarding the requirements for Palen to provide VOC ERCs or ERC source before AQMD issues the FDOC. Please note that Palen is required to provide sufficient VOC ERCs to satisfy offset requirement before AQMD will issue the Permits to Construct for their proposed project. These paragraphs should be revised to reflect this requirement.

Page C.1-8 1<sup>st</sup> & 2<sup>nd</sup> Paragraphs under C.1.12.3 Local

1<sup>st</sup> Paragraph - "Best Available Control Technology would be implemented, and emission reduction credits (ERCs) are ~~not~~ required to offset the proposed project' emission . . ."

2<sup>nd</sup> Paragraph - ". . . and a Revised Determination of Compliance (RDOC) on October 21~~2~~, 2010 (SCAQMD 2010c). The ~~R~~RDOC states that the proposed project is expected to comply with all applicable . . ."

Page C.1-11; Page C.1-28

These pages include statements indicating that the proposed project complies with the new federal NO<sub>2</sub> standard of 188 ug/m<sup>3</sup>. Please note that EPA issued a new standard for short-term NO<sub>2</sub> impacts that became effective in April 2010. However, EPA has subsequently issued guidance indicating that the standard is applicable to federal Prevention of Significance (PSD) projects. PSPP does not trigger PSD thresholds and does not require a PSD permit. As a result, this new federal NO<sub>2</sub> standard is not applicable. CEC has recently made such a determination in the PMPD for CPV Sentinel Energy Project (Docket No. 07-AFC-3).

Page C.1-12 through C.1-28 under C.1.15.2 District Conditions

All conditions under this section should be revised to reflect the changes identified in the engineering evaluation for the FDOC dated 11/30/10.

PROOF OF SERVICE (REVISED 8/27/10) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 12/1/10  
MS



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
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1516 NINTH STREET, SACRAMENTO, CA 95814  
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**APPLICATION FOR CERTIFICATION  
FOR THE PALEN SOLAR POWER  
PLANT PROJECT**

**Docket No. 09-AFC-7**

**PROOF OF SERVICE  
(Revised 8/27/10)**

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DECLARATION OF SERVICE

I, Teraja` Golston, declare that on December 1, 2010, I served and filed copies of the attached South Coast AOMD Comments on the PMPD, dated September 27, 2010. 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: [\[http://www.energy.ca.gov/sitingcases/solar\\_millennium\\_palen\]](http://www.energy.ca.gov/sitingcases/solar_millennium_palen)

The documents have been sent to both 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)*

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- sent electronically to all email addresses on the Proof of Service list;
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- depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

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1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
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I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Original Signature in Dockets  
Teraja` Golston