

DOCKETED

Docket Number:	12-AFC-02
Project Title:	Huntington Beach Energy Project
TN #:	202605
Document Title:	Applicant's Correspondence to SCAQMD re Verification of PDOC Public Notice Distribution
Description:	Correspondence
Filer:	Kimberly Hellwig
Organization:	Stoel Rives LLP
Submitter Role:	Applicant
Submission Date:	6/25/2014 4:29:29 PM
Docketed Date:	6/25/2014



AES Huntington Beach, LLC
21730 Newland Street
Huntington Beach, CA 92646

tel 562 493 7891
fax 562 493 7320

June 18, 2014

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

Subject: Verification of the Public Notice Distribution for the Huntington Beach Energy Project Permit Application (Facility ID# 115389)

Dear Mr. Perri:

Pursuant to the letter dated April 1, 2014 from Mr. Andrew Lee of the South Coast Air Quality Management District (SCAQMD) to Mr. Stephen O'Kane of AES Huntington Beach, LLC (AES) regarding the issuance of the Permit to Construction and a revised Title V permit for Facility ID 115389, attached is the verification that the public notice was distributed to all addresses within one-quarter mile of the facility. Given the urban nature of the project area, the methodology used to identify the addresses for this public notice distribution was based on the most recent Huntington Beach Generating Station Title V permit renewal public notice distribution. A map of the area where the public notices were distributed and the methodology used to identify the addresses are attached.

If you require further information, please don't hesitate contacting me at 562-493-7840.

Sincerely,

A handwritten signature in blue ink that reads "S. O'Kane".

Stephen O'Kane
Manager
AES Huntington Beach, LLC

Attachment

cc: Robert Mason/CH2M HILL
Melissa Foster/Stoel Rives
Jerry Salamy/CH2M HILL

**Attachment
Huntington Beach Energy Project Public Notice
Verification**



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

NOTICE OF INTENT TO ISSUE PERMITS PURSUANT TO SCAQMD RULES 212, 1710, 1714, AND 3006

This notice is to inform you that the South Coast Air Quality Management District (SCAQMD) has received permit applications from AES Huntington Beach, LLC for the Huntington Beach Energy Project (HBEP) which will consist of the replacement of two existing older and less efficient large electric generating utility boilers with six new, state of the art and more efficient electric generating gas turbines at Huntington Beach Generating Station in Huntington Beach. After a careful review and a detailed evaluation of the HBEP, SCAQMD has determined that the proposed project complies with all applicable federal, state and local air quality rules and regulations. Therefore, SCAQMD intends to issue Permits to Construct for the HBEP and to revise the Title V permit for this facility. However, prior to issuance of the final Title V permit, SCAQMD is providing an opportunity for public comments on the SCAQMD's proposed decision.

The SCAQMD is the air pollution control agency for the four-county region including all of Orange County and non-desert parts of Los Angeles, Riverside and San Bernardino Counties. Anyone wishing to install or modify equipment that could control or be a source of air pollution within this region must first obtain a permit from the SCAQMD. Under certain circumstances, before a permit is granted, a public notice, such as this, is prepared by the SCAQMD. For this project, public notification is required in accordance with SCAQMD Rule 212(c)(2), Rule 212(g) and Rule 1710(b) because the emissions from the new gas turbines exceed the public notice thresholds for these rules. Public notification is also required by SCAQMD Rule 3006(a) and Rule 1714(e) because there will be a significant revision to the facility's existing Title V air permit and the HBEP is subject to a Prevention of Significant Deterioration (PSD) Permit due to its greenhouse gas emissions.

The SCAQMD has evaluated the permit applications listed below for the following facility and determined that the HBEP meets or will meet all applicable federal, state and SCAQMD air quality rules and regulations as described below:

FACILITY: AES Huntington Beach, LLC
Facility ID No. 115389
21730 Newland St
Huntington Beach, CA 92646

CONTACT: Stephen O'Kane
AES Southland
690 N. Studebaker Rd.
Long Beach, CA 90803

SCAQMD APPLICATION NUMBERS

Application Number	Equipment Description
539746	Mitsubishi 500DA Combined Cycle Gas Turbine Generator, Unit 1A
539747	Mitsubishi 500DA Combined Cycle Gas Turbine Generator, Unit 1B
539748	Mitsubishi 500DA Combined Cycle Gas Turbine Generator, Unit 1C
539768	Mitsubishi 500DA Combined Cycle Gas Turbine Generator, Unit 2A
539769	Mitsubishi 500DA Combined Cycle Gas Turbine Generator, Unit 2B
539770	Mitsubishi 500DA Combined Cycle Gas Turbine Generator, Unit 2C
540256	Air Pollution Control Equipment, SCR and CO Catalyst for Unit 1A
540257	Air Pollution Control Equipment, SCR and CO Catalyst for Unit 1B

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540258	Air Pollution Control Equipment, SCR and CO Catalyst for Unit 1C
540260	Air Pollution Control Equipment, SCR and CO Catalyst for Unit 2A
540261	Air Pollution Control Equipment, SCR and CO Catalyst for Unit 2B
540262	Air Pollution Control Equipment, SCR and CO Catalyst for Unit 2C
540255	Aqueous Ammonia Storage Tank
540259	Title V/RECLAIM Significant Permit Revision
549121	Oil Water Separator

PROJECT DESCRIPTION

The proposed HBEP will replace the two existing electric utility boiler generator Units 1 and 2 that are older, less efficient units and which have been in operation since the 1950's with a new, state of the art and more efficient gas turbine generating system. The new generating system will consist of six natural gas-fired Mitsubishi 501DA combined cycle gas turbine generators configured as two 3-on-1 power blocks each with a steam turbine generator. The combined generating capacity of the HBEP will be 939 MW, as limited by the existing transmission line interconnect. This capacity replaces the generating capacity of the existing Unit 1 (215 MW) and Unit 2 (215 MW) at the Huntington Beach site as well as existing Unit 6 (175 MW) and Unit 8 (460 MW) at AES' Redondo Beach facility. The new HBEP will be equipped with air pollution control equipment, which consists of catalysts (selective catalytic reduction and oxidation catalysts). Additional new proposed equipment will include a 24,000 gallon aqueous ammonia storage tank and an oil water separator.

EMISSIONS

During normal operation, the total potential maximum daily, monthly, and annual emissions of criteria pollutants from the operation of the new HBEP are estimated not to exceed the emission levels listed in the table below. In addition, the new HBEP will generate emissions of greenhouse gases (GHGs). The total quantity of GHGs is calculated using the global warming potential for each compound and expressed in an amount equivalent to Carbon Dioxide (CO₂) emissions (CO₂ equivalent). The emissions listed below are strictly from the new equipment and do not include any emission reductions associated with the removal from service of the existing electric utility boiler generator Units 1 and 2.

Pollutant	Max Potential Emissions (Tons)		
	Daily	Monthly	Annual
Nitrogen Oxides (NO _x)	1.02	31.51	264.4
Carbon Monoxide (CO)	1.60	38.33	290.5
Volatile Organic Compounds (VOC)	0.87	22.46	17.5
Particulate Matter (diameter less than 10 microns, PM ₁₀ or diameter less than 2.5 microns, PM _{2.5})	0.40	12.83	99.3
Sulfur Oxides (SO _x)	0.16	5.03	43.6
Ammonia (NH ₃)	0.79	24.94	201.8
Carbon Dioxide equivalent (CO ₂ equivalent)	10,731	326,414	3,916,962

The proposed HBEP will not result in an increase in the electrical generating capacity since the total electrical generating capacity of the new HBEP is offset by the generating capacity it replaces, including Units 1 and 2 at Huntington Beach, and Units 6 and 8 at Redondo Beach. SCAQMD Rule 1304(a)(2) provides an offset exemption for an electric utility boiler replacement project such as this project. Therefore, the applicant is not required to provide emission offsets for VOC and PM10. Also, the South

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Coast Air Basin meets and is in attainment with ambient air quality standards for CO, so no CO offsets are required. All of the NO_x and SO_x emissions from this facility have to be offset with emission credits that AES Huntington Beach, LLC either holds or purchases through the Regional Clean Air Incentive's Market (RECLAIM) in the form of RECLAIM Trading Credits (RTCs). Finally, the total facility's potential emissions (the proposed new HBEP and all other equipment) of PM_{2.5} will be limited to less than 100 tons per year, therefore the new HBEP will not trigger the threshold for PM_{2.5} offset requirements as per SCAQMD Rule 1325. The NO_x and SO_x RTCs are required to be provided by AES Huntington Beach, LLC prior to the HBEP commencing its operation in accordance with SCAQMD RECLAIM Rule 2005.

As a result of burning natural gas in the gas turbines, emissions from the proposed project also contain small quantities of pollutants that are considered air toxics under SCAQMD Rule 1401-New Source Review of Toxic Air Contaminants. Therefore, a health risk assessment (HRA) has been performed for the HBEP. The health risk assessment uses health protective assumptions in estimating maximum risk to an individual person. Even assuming this health protective condition, the evaluation shows that the maximum individual cancer risk (MICR) increase from the gas turbines and the total project, as a whole, even without considering the emission reductions from old equipment being replaced, is less than one-in-one million and in compliance with SCAQMD's risk thresholds listed in Rule 1401. Also, acute and chronic indices, which measure non-cancer health impacts, are less than one. According to the state health experts, a hazard index of one or less means that the surrounding community including the most sensitive individuals such as very young children and the elderly will not experience any adverse health impacts due to exposure to these emissions. These levels of estimated risk are below the threshold limits of SCAQMD Rule 1401 (d) established for new or modified sources. The HRA results are shown in the table below:

Equipment	MICR (in a million)		Non-Cancer Hazard Index	
	Resident	Worker	Acute	Chronic
Facility HRA	2.35	0.49	0.069	0.008

PREVENTION OF SIGNIFICANT DETERIORATION (PSD) FOR CRITERIA POLLUTANTS

The South Coast Air Basin is in attainment with the national ambient air quality standards for Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂), Carbon Monoxide (CO) and Particulate Matter with aerodynamic diameter less than 10 microns (PM10); therefore, the NO₂, SO₂, CO, and PM10 emissions from the project are subject to the SCAQMD's Prevention of Significant Deterioration (PSD) regulation (Regulation XVII).

The Huntington Beach Generating Station is classified as a major stationary source, and the estimated maximum project emissions of NO₂ of 52.2 micro grams per cubic meter (µg/m³) exceed the PSD significance impact level (SIL) of 7.5 µg/m³. Therefore, an incremental modeling analysis is required to demonstrate that the proposed HBEP does not cause, or make significantly worse an existing, 1-hour NO₂ violation of the national ambient air quality standard (NAAQS). The results of the incremental modeling analysis show that the peak contribution from the proposed HBEP is 168.2 µg/m³ and therefore does not result in a violation of the existing 1-hour NO₂ NAAQS of 188 µg/m³.

Also based on the result of a screening analysis of the potential impacts to Class I wilderness areas, the HBEP will not impact visibility on the nearest Class I areas (i.e., San Gabriel Wilderness area and Cucamonga Wilderness area). The U.S. Department of Agriculture – National Park/Forest Services are currently reviewing the PSD modeling analysis. Based on all of these analysis and evaluations, the

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SCAQMD has determined that the proposed HBEP is expected to comply with all PSD requirements for criteria pollutants.

PREVENTION OF SIGNIFICANT DETERIORATION (PSD) FOR GREENHOUSE GASES

Based on the proposed HBEP maximum potential greenhouse gas (GHG) emissions, the proposed project is subject to preconstruction review for GHGs. SCAQMD staff has evaluated the GHG emissions from the HBEP for compliance determination with applicable federal, state, and local air quality requirements. The HBEP is found to comply with Rule 1714 BACT requirements for GHG emissions through the use of energy efficient gas turbines.

Based on the result of our detailed analysis and evaluation, the SCAQMD has determined that the HBEP complies with all applicable federal, state and SCAQMD air quality Rules and Regulations and, therefore, SCAQMD intends to issue the Permits to Construct for the equipment described above. However, prior to issuance of a final permit, SCAQMD is providing an opportunity for a 30-day public comment period and an EPA review period. SCAQMD will consider issuance of the final permit only after all pertinent public and EPA comments, if any, have been received and considered, and after CEC's final approval of the AFC for this project.

This facility is classified as a federal Title IV (Acid Rain) and Title V facility. Pursuant to SCAQMD Rule 3006 – Public Participation, any person may request a proposed permit hearing on an application for an initial, renewal, or significant revision to a Title V permit by filing with the Executive Officer a complete Hearing Request Form (Form 500G) for a proposed hearing within 15 days of the date of distribution of this notice. This form is available on the SCAQMD website at <http://www.aqmd.gov/permit/Formspdf/TitleV/AQMDForm500-G.pdf>, or alternatively, the form can be made available by contacting Mr. Chris Perri at the e-mail and telephone number listed below. In order for a request for a public hearing to be valid, the request must comply with the requirements of SCAQMD Rule 3006 (a)(1)(F). On or before the date the request is filed, the person requesting a proposed permit hearing must also send by first class mail a copy of the request to the facility address and contact person listed above.

The proposed permits and other information are available for public review at the SCAQMD's headquarters in Diamond Bar, and at the Huntington Beach Public Library, 7111 Talbert Avenue, Huntington Beach, CA 92648. Additional information including the facility owner's compliance history submitted to the SCAQMD pursuant to California Health and Safety Code Section 42336, or otherwise known to the SCAQMD, based on credible information, is available at the SCAQMD for public review by contacting Mr. Chris Perri (cperri@aqmd.gov), Engineering and Compliance, South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, CA 91865-4182, (909) 396-2696. A copy of the draft Permits to Construct can also be viewed at <http://www3.aqmd.gov/webappl/PublicNotices2/>. Anyone wishing to comment on the air quality elements of the permits must submit comments in writing to the SCAQMD at the above address, attention Mr. Andrew Lee. **Comments must be received within 30 days of the distribution date of this notice, as shown below.** If you are concerned primarily about zoning decisions and the process by which the facility has been sited in this location, contact the local city or county planning department for the city or unincorporated county in which the facility is located. For your general information, anyone experiencing air quality problems such as dust or odor can telephone in a complaint to the SCAQMD 24 hours a day by calling toll free 1-800-CUT-SMOG (1-800-288-7664).

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21402 YARMOUTH LN
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OCCUPANTS
21401 BRETON LN
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OCCUPANTS
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OCCUPANTS
21900 PACIFIC COAST HWY
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HUNTINGTON BEACH CA 92646



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HUNTINGTON BEACH CA 92646

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21932 KIOWA LN
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OCCUPANTS
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HUNTINGTON BEACH CA 92646

OCCUPANTS
21851 NEWLAND ST #190
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OCCUPANTS
21851 NEWLAND ST #191
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OCCUPANTS
9092 MAHALO DR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9102 MAHALO DR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9112 MAHALO DR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9122 MAHALO DR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9121 KAPAA DR
HUNTINGTON BEACH CA 92646

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9111 KAPAA DR
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OCCUPANTS
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9091 KAPAA DR
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JUN 17 2014
AMOUNT
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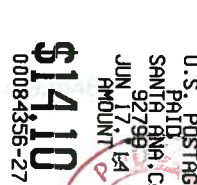
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HUNTINGTON BEACH C



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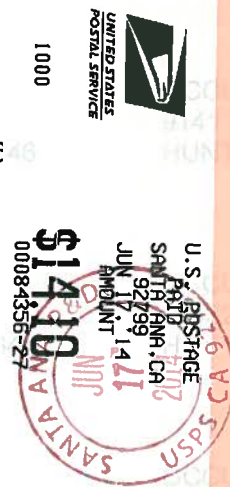
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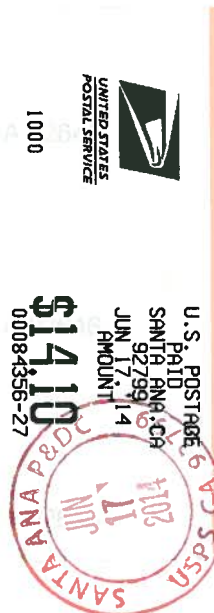
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OCCUPANTS
9021 ADELIA CIR
HUNTINGTON BEACH CA 92646



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OCCUPANTS
21752 COAST HWY #19
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8524 HAMILTON AVE
HUNTINGTON BEACH CA 92646

UNITED STATES
POSTAL SERVICE
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U.S. POSTAGE
PAID
SANTA ANA, CA
92799
JUN 17 2014
AMOUNT
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OCCUPANTS
9062 REGATTA DR
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OCCUPANTS
9042 BOBBIE CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9062 BOBBIE CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9072 BOBBIE CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9082 BOBBIE CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9092 BOBBIE CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9091 NIGUEL CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9081 NIGUEL CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9071 NIGUEL CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9051 NIGUEL CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9041 NIGUEL CIR
HUNTINGTON BEACH CA 92646

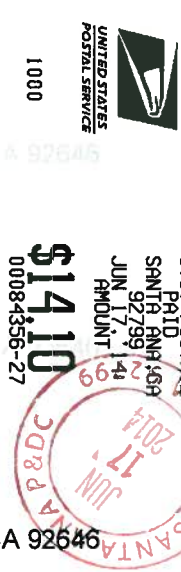
OCCUPANTS
9031 NIGUEL CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9021 NIGUEL CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9001 NIGUEL CIR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9111 REGATTA DR
HUNTINGTON BEACH CA 92646

OCCUPANTS
9021 REGATTA DR
HUNTINGTON BEACH CA 92646



30

Public Notice Mailing for AQMD Permit

TO: Stephen O'Kane, AES-Southland LLC, Huntington Beach
Generating Station

FROM: Robert Mason, CH2M HILL Engineering, Inc

DATE: March 29, 2011

Reference: Title V Permit Renewal – AES-Southland, LLC – Huntington Beach Generating Station Public Notice [Application Numbers: 426085; 427061; 427064; 409468; 409470; 377759; and 372930]

Verification of Public Notice Distribution and Description of Method Use to Determine Addresses Within a 1/4-Mile Radius

The South Coast Air Quality Management District (AQMD) Public Notice for the Renewal of the Title V Permit for the AES-Southland LLC - Huntington Beach Generating Station was mailed First Class through the U.S. Postal Service to each address within 1/4-mile from the site pursuant to AQMD Rules 3006(a) and 212(g) on March 29, 2011. Attached is a copy of the U.S. Postal Service mailing certification for mailing of the Public Notice. A total of 743 Public Notices were mailed.

As required by SCAQMD Rule 212, the public notices were distributed to each address within a 1/4-mile radius of the project site (see attached Figure 1). The addresses for the public notices mailing list were acquired using the Metroscan data system, which provided all addresses within a minimum of 1/4-mile radial distance from the site. Because of the physical shape of the AES-SL Huntington Beach Generating Station, it was necessary to add some distance to the search radius so that all addresses within 1/4-mile of the boundaries of the site would be included. For this reason, the distance from the farthest corner of the site to its center was added to the search radius from the adjoining parcel to the East (114-150-96), which resulted in a 1,000 feet being added to the quarter mile (1,320 feet), resulting in the final radius being 2,320 feet on the eastside of the site.

All addresses within this combined distance were then collected for the mailing. In order to determine which addresses provided by the Metroscan data system are single street addresses for multiple-occupancy buildings (either commercial or residential), project staff visited the search area for all areas not indicated by Metroscan as single-family residential. Therefore, there was field verification of whether or not multiple-occupancy addresses are present in the search area. Where multiple-occupancy was found, addresses were added for the individual residential or commercial units.

Ground-truthing was conducted to assess whether new construction or demolition within the defined search radius of the site had occurred since the records of addresses in the area were entered into the Metroscan data system. No new construction or demolition was observed and addresses found via the Metroscan data system were used for the distribution of the public notices.



LEGEND

-  Site Boundary
-  1/4 Mile Radius

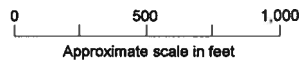


FIGURE 1
 1/4 Mile Radius from Property Boundary
 Huntington Beach Generating Station
 AES Southland, LLC