

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512

March 8, 2010

Mr. Alan J. De Salvio
Supervising Air Quality Engineer
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, California 92392

DOCKET
09-AFC-8
DATE <u>MAR 08 2010</u>
RECD. <u>MAR 08 2010</u>

**Re: Comments on Preliminary Determination of Compliance (PDOC)
Abengoa Mojave Solar Project (09-AFC-5)**

Dear Mr. De Salvio,

Energy Commission staff has reviewed the Mojave Desert Air Quality Management District's PDOC for the Abengoa Mojave Solar Project and has the following comments for your consideration for inclusion in the Final Determination of Compliance (FDOC).

Comment on PDOC Engineering Evaluation

Criteria Pollutant Emission Estimates

Staff is concerned with the inconsistencies between the maximum daily operation emissions presented in Table 2 (page 5) and those emissions presented in the PDOC appendix. It is unclear what Table 2 represents, such as uncontrolled emissions or all equipment operating 24 hours per day. Staff's attempts at matching a scenario that could result in the emissions presented in this table have failed. Staff suggests either deletion of this table, or correction of this table with an explanation of the calculation basis. This table appears to be inconsistent with the other emissions values presented and would be potentially inconsistent with other PDOC findings such as the determination of whether BACT is triggered for the various emission sources.

Comment on PDOC Conditions

Consistency with Genesis Solar Energy Project and Blythe Solar Power Project PDOCs

Staff notes that we have found inconsistencies in the three solar trough PDOCs recently published by the District. Most importantly there are inconsistencies in the conditions for similar emission sources between these three projects. For example, a Continuous Emission Monitoring System (CEMS) is a condition requirement for the Genesis Solar Energy Project boiler but a similar condition does not exist for the similar boiler/heater emission sources in the PDOCs for the Abengoa Mojave or Blythe Solar projects. In addition, conditions for the inspection and maintenance requirements for the HTF tank and piping systems are not consistent for these three projects. Staff understands that there are differences between these projects, such as a different HTF tank vent control system for Abengoa Mojave that requires a set of different PDOC conditions, and is only commenting on consistency for conditions related to what are equivalent emission sources and controls systems. Staff requests that the District please review and

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compare the conditions for these three projects and revise as necessary to improve the consistency of conditions for similar emission sources.

If you have any questions, please contact Gerry Bemis of my staff at (916) 654-4960. Thank you for the opportunity to comment on the Abengoa Mojave Solar Project's Preliminary Determinations of Compliance.

Sincerely,

Original signed by M. Layton

MATT LAYTON, Manager
Engineering & Corridor Designation Office
Siting, Transmission and Environmental
Protection Division

cc: Docket Abengoa
Docket Genesis
Docket Blythe