

DOCKETED

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Document Title:	Letter to Ms. Miller re: Two Corrections Made to the FDOC, dated August 27, 2014
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South Coast Air Quality Management District

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

August 27, 2014

Ms. Felicia Miller, Project Manager
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

SUBJECT: Huntington Beach Energy Project (HBEP)
Facility Location: 21730 Newland St, Huntington Beach, CA 92646

Dear Ms. Miller:

This letter is to inform you of two corrections we are making to the HBEP FDOC at this time.

The first can be found on page 43 of the FDOC, and is a reference to the 'Costa Mesa monitoring station', which should read 'John Wayne monitoring station.' The decision to use John Wayne monitoring station data instead of the Costa Mesa data was made during the course of the evaluation process for HBEP, and all the modeling analysis presented in both the PDOC and FDOC are based on the John Wayne airport data. The reasons for this decision are documented in the FDOC (and the PDOC) on page 137, and are summarized as follows:

- Surface characteristics at John Wayne airport are more similar to the project site
- John Wayne airport data is more current
- John Wayne airport has less missing data
- Cost Mesa data is problematic in the percent of calm winds

The second can be found on page 64 of the FDOC in condition A195.10 which reads 'This limit only applies if the capacity factor of the unit exceeds 60% on an annual basis' and should read 'This limit only applies if the capacity factor of the unit *is equal to or* exceeds 60% on an annual basis.'

If you have any questions regarding these issues, please contact Mr. Andrew Lee, Senior Engineering Manager at (909) [396-2643](tel:396-2643)/alee@aqmd.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mohsen Nazemi'.

Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering and Compliance



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Engineering Division
Application Processing & Calculations

PAGE 43	PAGES 144
APPL NO. See Below	DATE 8/26/14
PROCESSED BY CP01	CHECKED BY

1. Determine whether preconstruction monitoring is required
2. Assessment of significance under PSD
3. Determine Ambient Air Quality Impacts
4. Determine Impacts in Class I Areas, including visibility, soil, and vegetation

The applicant performed modeling which indicated that the maximum 1-hour and 8-hour CO impacts from turbine operations including start ups and shutdowns are 332.6 ug/m³ and 78.3 ug/m³ respectively. These results are below the corresponding US EPA CO Class II SILs of 2,000 ug/m³ and 500 ug/m³. Therefore, 1-hour and 8-hour CO ~~increment~~ cumulative impact analyses are not required.

The peak annual NO₂ impact from the total project is 0.49 ug/m³. This impact is less than the US EPA NO₂ Class II ~~significance~~ significant impact of level of 1 ug/m³, therefore, no additional PSD analysis is necessary.

For 1-hour NO₂ impacts, it was first determined that the peak impact level from the proposed project of 52.2 ug/m³ exceeds the significance impact level of 7.52 ug/m³. Therefore, a cumulative impact assessment is necessary.

For the cumulative impact assessment, three facilities, Orange County Sanitation District's Huntington Beach and Fountain Valley facilities and Beta Offshore as well as emissions from shipping lane activities off the coast were selected to be included based on their facility emissions and distance to the project. Seasonal, by hour-of-day background concentrations from the Costa Mesa John Wayne monitoring station were used in the modeling. Following the form of the standard, the 1-hour NO₂ impact from the project plus cumulative sources plus background is 168.2 ug/m³, which is less than the Federal 1-hour standard of 188 ug/m³. Therefore, no additional PSD analysis is necessary.

Effective July 26, 2013, the South Coast Air Basin has been re-designated to attainment for the 24 hour PM₁₀ NAAQS. The total project's peak 24-hour impact is 4.74 ug/m³, which is less than the Class II SIL of 5 ug/m³, therefore no additional PSD analysis is necessary.

Visibility Analysis

The nearest Class I areas to the project site are the San Gabriel Wilderness and Cucamonga Wilderness areas located approximately 69 km away. A radial receptor ring was placed at a distance of 50 km from the project (50 km is the maximum receptor distance of the AERMOD model). The maximum project impact for annual NO₂ at 50 km is 0.02 ug/m³, which is less than the significance level of 0.1 ug/m³.



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PAGE 64	PAGES 144
APPL NO. See Below	DATE 8/26/14
PROCESSED BY CP01	CHECKED BY

A63.6

The operator shall limit emission from this equipment as follows:

CONTAMINANT	EMISSION LIMIT
PM10	2,930 LBS IN ANY ONE MONTH
CO	112,882 LBS IN ANY ONE MONTH
VOC	14,121 LBS IN ANY ONE MONTH

The above limits apply during commissioning. The above limits apply to each turbine.

The operator shall calculate compliance with the emission limit(s) by using fuel use data and the following emission factors: VOC: 21.74 lbs/mmcf, PM10: 4.51 lbs/mmcf, and CO: 173.80 lbs/mmcf.

A99.4

The 12.75 LBS/MMCF NOx emission limits shall only apply during turbine operation prior to CEMS certification for reporting NOx emissions.
[Rule 2012]

A195.6

The 2.0 PPMV NOX emission limit(s) is averaged over 60 minutes at 15 percent O2, dry. This limit shall not apply during commissioning, turbine start ups and turbine shutdowns.
[Rule 1703-PSD, Rule 2005]

A195.7

The 2.0 PPMV CO emission limit(s) is averaged over 60 minutes at 15 percent O2, dry. This limit shall not apply during commissioning, turbine start ups and turbine shutdowns.
[Rule 1703-PSD]

A195.8

The 2.0 PPMV VOC emission limit(s) is averaged over 60 minutes at 15 percent O2, dry. This limit shall not apply during commissioning, turbine start ups and turbine shutdowns.
[Rule 1303(a) – BACT, Rule 1303(b)(2) - Offsets]

A195.10

The 1100 lbs/netMWH CO2 limit is averaged over 12 rolling months. This limit only applies if the capacity factor of the unit is equal to or exceeds 60% on an annual basis.
[CCR Title 20]