

DOCKETED

Docket Number:	12-AFC-02C
Project Title:	Huntington Beach Energy Project - Compliance
TN #:	206352
Document Title:	Letter from South Coast Air Quality Management District re: Amended Huntington Beach Energy Project
Description:	Letter from SCAQMD to AES re incomplete application
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Organization:	Stoel Rives LLP
Submitter Role:	Applicant
Submission Date:	10/14/2015 11:55:55 AM
Docketed Date:	10/14/2015



South Coast Air Quality Management District

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September 30, 2015

Mr. Stephen O’Kane
Manager
AES Huntington Beach, LLC
21730 Newland St
Huntington Beach, CA 92646

Subject: Amended Huntington Beach Energy Project (ID# 115389)

Dear Mr. O’Kane,

On September 8, 2015 we received your application submittal for the proposed Amended Huntington Beach Energy Project to be located at the Huntington Beach Generating Station.

After initial review of the information submitted, the applications are deemed incomplete at this time. The information submittal is insufficient for us to make an evaluation of the proposed project.

Application	Equipment Description	Completeness Determination
578073	Combined Cycle Turbine #1A	Deemed Incomplete
578074	Combined Cycle Turbine #1B	Deemed Incomplete
578075	SCR/CO Catalyst #1A	Deemed Incomplete
578076	SCR/CO Catalyst #1B	Deemed Incomplete
578077	Simple Cycle Turbine #2A	Deemed Incomplete
578078	Simple Cycle Turbine #2B	Deemed Incomplete
578079	SCR/CO Catalyst #2A	Deemed Incomplete
578080	SCR/CO Catalyst #2B	Deemed Incomplete
578081	Auxiliary Boiler	Deemed Incomplete
578082	Auxiliary Boiler SCR	Deemed Incomplete
578083	Ammonia Storage	Deemed Incomplete
578084	Ammonia Storage	Deemed Incomplete
578085	Oil/Water Separation	Deemed Incomplete
578086	Oil/Water Separation	Deemed Incomplete
578087	Title V Revision	Deemed Incomplete

The following information is required:

- The Criteria Pollutant/GHG BACT analysis section of the document is based on the turbines that were previously proposed under the old HBEP. This section needs to be rewritten to address only the current proposal for HBEP. Please include as part of the analysis, justification for the CCGS proposed BACT levels of 2.0 ppm VOC and CO considering the lower limits on these pollutants for other facilities around the country.
- The organization of the document makes it difficult to decipher what emission rates were used in the modeling. Please provide data in tabular format which specifies what stack

parameters were used and what equipment was modeled for each of the modeling scenarios.

- Please provide a thorough detailed analysis specifying how the turbines will comply with the applicable rules and regulations, including state and federal regulations for GHGs.
- Please provide more detail regarding the assumptions used to calculate the start up emissions for the CCGS.
- Please provide manufacturer name, type, and size information for the SCR serving the Auxiliary Boiler.
- Please provide information for the proposed maximum number of daily start ups for each turbine unit. Please indicate whether simultaneous start ups are proposed for any of the units.
- Please provide a statement certifying that all major sources owned or operated by AES Corporation, in the State of California, are in compliance with all applicable air quality regulations.
- As part of your project, AES HB Boilers 1 and 2 and AES Redondo Beach Boiler 7 will be shutdown. In order to verify that the shutdowns are permanent, SCAQMD will need a detailed decommissioning plan outlining the schedule and steps that will be taken to render these units non-operational.

Please be aware that additional clarifying information may be needed during the course of our full engineering evaluation. Your cooperation is key to the timely review of the applications. Please provide the requested information no later than 30 days from the date of this letter.

Feel free to contact John Yee of my staff at (909) 396-2531, or jyee@aqmd.gov, for further information or clarification.

Sincerely,



Andrew Lee, P.E.
Senior Engineering Manager
Engineering and Compliance

Cc: Jerry Salamy/CH2M Hill (jerry.salamy@ch2m.com)
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