



California Energy Commission

DOCKETED
12-AFC-02

TN 71513

JUL 03 2013

500 Capitol Mall, Suite 1600
Sacramento, CA 95814
main 916.447.0700
fax 916.447.4781
www.stoel.com

July 3, 2013

MELISSA A. FOSTER
Direct (916) 319-4673
mafoster@stoel.com

VIA EMAIL

Ms. Felicia Miller, Siting Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Huntington Beach Energy Project (12-AFC-02)
Applicant's Correspondence Related to Air Quality

Dear Ms. Miller:

Enclosed herein for docketing please find recent air quality correspondence for the Huntington Beach Energy Project. The enclosed documents will be served to all parties pursuant to the enclosed proof of service.

Respectfully submitted,

A handwritten signature in blue ink that reads "Melissa A. Foster".

Melissa A. Foster

MAF:jmw

Enclosure

cc: POS List



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**APPLICATION FOR CERTIFICATION FOR THE
HUNTINGTON BEACH ENERGY PROJECT**

**Docket No. 12-AFC-02
PROOF OF SERVICE
(Revised 03/26/2013)**

SERVICE LIST:

APPLICANT

AES Southland Development, LLC
Stephen O'Kane
Jennifer Didlo
690 Studebaker Road
Long Beach, CA 90803
stephen.okane@aes.com
jennifer.didlo@aes.com

APPLICANT'S CONSULTANTS

CH2MHill
Robert Mason
Project Manager
6 Hutton Centre Drive, Suite 700
Santa Ana, CA 92707
robert.mason@CH2M.com

APPLICANT'S COUNSEL

Melissa A. Foster
Stoel Rives, LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
mafoster@stoel.com

INTERVENOR

Jason Pyle
9071 Kapaa Drive
Huntington Beach, CA 92646
jasonpyle@me.com

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

INTERESTED AGENCIES (Cont'd.)

California Coastal Commission
Tom Luster
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219
tluster@coastal.ca.gov

California State Parks
Huntington State Beach
Brian Ketterer
21601 Pacific Coast Highway
Huntington Beach, CA 92646
bketterer@parks.ca.gov

City of Huntington Beach
Planning & Building Department
Jane James
Scott Hess
Aaron Klemm
2000 Main Street, 3rd floor
Huntington Beach, CA 92648
jjames@surfcity-hb.org
shess@surfcity-hb.org
aaron.klemm@surfcity-hb.org

City of Huntington Beach
City Council
Cathy Fikes
Johanna Stephenson
2000 Main Street, 4th floor
Huntington Beach, CA 92648
cfikes@surfcity-hb.org
johanna.stephenson@surfcity-hb.org.

INTERESTED AGENCIES (Cont'd.)

Santa Ana Regional
Water Quality Board
Gary Stewart
3737 Main Street, Suite 500
Riverside, CA 92501-3339
gstewart@waterboards.ca.gov

Huntington Beach
Wetlands Conservancy
Jack Kirkorn, Director
21900 Pacific Coast Highway
Huntington Beach, CA 92646
jfk0480@aol.com

ENERGY COMMISSION STAFF

Felicia Miller
Project Manager
felicia.miller@energy.ca.gov

Kevin W. Bell
Staff Counsel
kevin.w.bell@energy.ca.gov

**ENERGY COMMISSION –
PUBLIC ADVISER**

Blake Roberts
Assistant Public Adviser
publicadviser@energy.ca.gov

COMMISSION DOCKET UNIT

California Energy Commission –
Docket Unit
Attn: Docket No. 12-AFC-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

*indicates change

73705109.1 0043653-00005

**OTHER ENERGY COMMISSION
PARTICIPANTS (LISTED FOR
CONVENIENCE ONLY):**

After docketing, the Docket Unit will provide a copy to the persons listed below. Do not send copies of documents to these persons unless specifically directed to do so.

ANDREW McALLISTER
Commissioner and Presiding Member

KAREN DOUGLAS
Commissioner and Associate Member

Susan Cochran
Hearing Adviser

Hazel Miranda
Adviser to Commissioner McAllister

Patrick Saxton
Adviser to Commissioner McAllister

Galen Lemei
Adviser to Commissioner Douglas

Jennifer Nelson
Adviser to Commissioner Douglas

Eileen Allen
Commissioners' Technical
Adviser for Facility Siting

DECLARATION OF SERVICE

I, Kimberly J. Hellwig, declare that on July 3, 2013, I served and filed the attached Applicant's Correspondence Related to Air Quality. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: http://www.energy.ca.gov/sitingcases/huntington_beach_energy/index.html.

The document has been sent to the other parties on the Service List above in the following manner:

(Check one)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

- I e-mailed the above referenced document to all e-mail addresses on the Service List above; **OR**
- Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: July 3, 2013

//Original Signed\\
Kimberly J. Hellwig

[REDACTED]

[REDACTED]

[REDACTED]

From: Jillian Baker [mailto:jbaker@aqmd.gov]
Sent: Friday, May 31, 2013 5:23 PM
To: Stephen O'Kane; Frohning, John/SEA
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee; Salamy, Jerry/SAC
Subject: RE: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

Hi Stephen,

I will be able to provide the shipping information within the next 2 weeks. However, for the facility information, it is my understanding that you will need to submit a public records request for that. We discussed the procedure on the conference call on 4/5/13 and I believe that John Frohning has requested the information and is in the process of collecting it. Once you have put together the information, you can send it to me in an email and I will review and let you know if the information is correct.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

From: Stephen O'Kane [mailto:stephen.okane@AES.com]
Sent: Friday, May 31, 2013 3:09 PM
To: Jillian Baker; John.Frohning@CH2M.com
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee; Jerry.Salamy@CH2M.com
Subject: RE: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

Thank you Jillian. Please let us know your ETA for providing the appropriate modeling emissions data and source parameters for the following:

[REDACTED]

AES Huntington Beach
Orange County Sanitation District (ID#29110) and Beta offshore (ID#166073) and Shipping lane activity off the coast (AQMD to provide you with the UTM coordinates, modeling parameters, and emission rates to be used)

Your attention to this matter is appreciated.

Stephen O'Kane

From: Jillian Baker [<mailto:jbaker@aqmd.gov>]
Sent: Friday, May 31, 2013 2:55 PM
To: John.Frohning@CH2M.com; Stephen O'Kane
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee
Subject: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

Hi John and Stephen,

Here are our written comments on the Modeling Protocol Addendums you provided for the two AES projects. These modeling protocol addendums are for modeling related to the 1-hour NO₂ cumulative impact assessment, which is triggered because the project's NO₂ emissions exceed the SIL of 7.52 µg/m³.

AES Huntington Beach – Modeling Protocol Addendum (dated March 22, 2013)

- These comments (except for the last item) were discussed on our conference call on 4/5/13.
- When using PVMRM to calculate the conversion of NO_x to NO₂, an ambient ratio of 0.9 will have to be used. If you would like to use any other ratio, then justification needs to be provided as to the validity of that ratio.
- We will provide you with the background NO₂ concentrations to use. (This was provided to you on 4/16/13)
- For the cumulative impact assessment, facilities within a 10-km radius will have to be considered.
- An analysis of the visibility impacts to Class II areas using VISCREEN needs to be provided. We suggested looking at the LADWP Scattergood comment letter and the response provided as a guide to what EPA is looking for. For example, looking at a state or regional park and using the IMPROVE network suggested visual range in the analysis.
- We will continue to work with you to narrow down the facilities which need to be included. We have proposed an approach to EPA and are waiting for their approval. This preliminary approach includes:
 - Two facilities to be included in the cumulative analysis - Orange County Sanitation District (ID#29110) and Beta offshore (ID#166073)
 - Shipping lane activity off the coast (I will provide you with the UTM coordinates, modeling parameters, and emission rates to be used)
 - The existing operations occurring at AES HB will be included unless that equipment will be removed and not operational when the new equipment becomes operational.
 - As soon as EPA approves this approach, we will let you know.

[REDACTED]

Please let me know if you have any questions.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,

Diamond Bar, CA 91765

Direct: 909.396.3176

This communication is for use by the intended recipient and contains information that may be privileged, confidential or copyrighted under law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-Mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-Mail and delete this e-Mail from your system. Unless explicitly and conspicuously stated in the subject matter of the above e-Mail, this e-Mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-Mail does not constitute consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

N2O	53.1
CO2 Equivalent (Total)	3,141,167

Your quick responses have been greatly appreciated.

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Notar, John [mailto:john_notar@nps.gov]
Sent: Wednesday, June 05, 2013 4:40 PM
To: Salamy, Jerry/SAC
Cc: tonnie_cummings@nps.gov; Don_Shepherd@nps.gov; John Notar
Subject: Re: AES Huntington Beach Energy Projects

Jerry: thanks for the information. The National Park Service will screen the AES Southland Development LLC (AES) on the Huntington Beach Energy Project (HBEP) located in Huntington Beach, California. for review for AQRV impacts at Joshua Tree NP based on the Q/D value of 3.3. You may forward this to South Coast AQMD.

Can you tell me the CO2 emissions, as I said we are just tracking greenhouse gas emissions. Please CC Don Shepherd with this information.

Thanks

John Notar

On Wed, Jun 5, 2013 at 5:26 PM, <Jerry.Salamy@ch2m.com> wrote:

John,

The 7.0 Q/D value is for the Cucamonga Wilderness Area (FS) which is 69 km from HBEP. The nearest NPS Class I area is Joshua Tree National Park at 145 km from HBEP. This would equate to a Q/D of 3.3 (483 TPY/145) for Joshua Tree.

Regarding BACT levels, we proposed the following:

2 ppm at 15% oxygen for NOx and CO

1 ppm at 15% oxygen for VOC

Low sulfur natural gas fuel for SO2 and PM/PM10/PM2.5

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Notar, John [mailto:john_notar@nps.gov]
Sent: Wednesday, June 05, 2013 4:11 PM
To: Salamy, Jerry/SAC
Cc: tonnie_cummings@nps.gov; Don Shepherd; John Notar
Subject: Re: AES Huntington Beach Energy Projects

Jerry: thanks for getting back to me. Is 7.0 for the the closest NPS unit (not US Forest Service) you measured for? I assume the NOx emissions will be permitted at 2.0 ppm? Is that true? We are collecting information on controls on NG fired power plants.

thanks

John

John Notar
National Park Service
Air Resources Division
12795 W. Alameda Pkwy.
Lakewood, CO 80228
Phone: 303-969-2079
Fax: 303-969-2822
E-Mail: john_notar@nps.gov

On Wed, Jun 5, 2013 at 4:58 PM, <Jerry.Salamy@ch2m.com> wrote:

John,

From the application, we calculated the Q/D value using the FLAG 2010 guidance as 7.0.

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Notar, John [mailto:john_notar@nps.gov]
Sent: Wednesday, June 05, 2013 3:53 PM
To: Salamy, Jerry/SAC
Cc: Tonnie Cummings; John Notar
Subject: Re: AES Huntington Beach Energy Projects

Jerry: as far as I can determine NPS has not seen the PSD application for this project.

Do you know what the Q/D value is greater than 10.0?

In the FLM's FLAG 2010 guidance it describes the Q/D calculation. If the Q/D is less than 10.0 NPS usually screens the project out for AQRV analyses. Q is the sum of emissions based on the maximum permitted 24-hour emission rates of

SO₂, SO₄, NO_x, all species of PM-coarse, fine, condensables and elemental carbon. Convert the 24 hour summed emissions into a total tons per year and then divide (D) distance in kilometers.

Before you email or hard mail the application can you get back to me with the Q/D value .

Our email can accept 10 mb size files. If this is too small you can mail it to me at the address below.

thanks

John Notar

On Wed, Jun 5, 2013 at 4:27 PM, <Jerry.Salamy@ch2m.com> wrote:

Mr. Notar,

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responsibility for management of any lands within the Class I area. The project site has several Class I areas within the 100 km. Therefore, the purpose of this email is determine if the National Park Service has received a copy of HBEP's PSD application for review and to provide any materials the Service needs to assess project impacts on federal lands.

As a note, I will also be contacting Mr. McCorison at the Forest Service with a similar request.

Please email or call with any questions you may have.

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

Your quick responses have been greatly appreciated.

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*Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
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Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
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Fax 916-614-3407
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thanks

John

John Notar
National Park Service
Air Resources Division
12795 W. Alameda Pkwy.
Lakewood, CO 80228
Phone: 303-969-2079
Fax: 303-969-2822
E-Mail: john_notar@nps.gov

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Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207

Fax 916-614-3407
Cell Phone 916-769-8919

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Sent: Wednesday, June 05, 2013 3:53 PM
To: Salamy, Jerry/SAC
Cc: Tonnie Cummings; John Notar
Subject: Re: AES Huntington Beach Energy Projects

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SO₂, SO₄, NO_x, all species of PM-coarse, fine, condensables and elemental carbon. Convert the 24 hour summed emissions into a total tons per year and then divide (D) distance in kilometers.

Before you email or hard mail the application can you get back to me with the Q/D value .

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John Notar

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copy of HBEP's PSD application for review and to provide any materials the Service needs to assess project impacts on federal lands.

As a note, I will also be contacting Mr. McCorison at the Forest Service with a similar request.

Please email or call with any questions you may have.

Thanks,

*Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919*

--

Don Shepherd
National Park Service
Air Resources Division
12795 W. Alameda Pkwy.
Lakewood, CO 80228
Phone: 303-969-2075
Fax: 303-969-2822

E-Mail: don_shepherd@nps.gov

"the man who really counts in the world is the doer, not the mere critic" TR 1891

From: anick@fs.fed.us
Sent: Thursday, June 13, 2013 2:00 PM
To: Jerry.Salamy@CH2M.com
Cc: mmccorison@fs.fed.us
Subject: RE: AES Huntington Beach Energy Project

Jerry,

Thank you, we will look forward to receiving the materials. Have a great week.

Andrea Nick
Air Resource Specialist
701 N. Santa Anita Ave.
Arcadia, Ca. 91006
(626)574-5209
anick@fs.fed.us

From: Jerry.Salamy@CH2M.com [mailto:Jerry.Salamy@CH2M.com]
Sent: Thursday, June 13, 2013 1:57 PM
To: Nick, Andrea -FS
Subject: RE: AES Huntington Beach Energy Project

Andrea,

One hard and electronic copy will be delivered early next week.

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Nick, Andrea -FS [mailto:anick@fs.fed.us]
Sent: Thursday, June 13, 2013 1:49 PM
To: Salamy, Jerry/SAC
Subject: RE: AES Huntington Beach Energy Project

Hello,

Is it possible to get both? I prefer electronic but I think he prefers hard copy. The address in my signature block is the valid mailing address for both us (we sit next to each other).

Andrea Nick
Air Resource Specialist
701 N. Santa Anita Ave.
Arcadia, Ca. 91006
(626)574-5209

anick@fs.fed.us

From: Jerry.Salamy@CH2M.com [<mailto:Jerry.Salamy@CH2M.com>]
Sent: Thursday, June 13, 2013 1:46 PM
To: Nick, Andrea -FS
Subject: RE: AES Huntington Beach Energy Project

Hi Andrea,

Do you know if Mike would want a hard copy or an electronic copy of the PSD application?

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Nick, Andrea -FS [<mailto:anick@fs.fed.us>]
Sent: Thursday, June 13, 2013 1:44 PM
To: Salamy, Jerry/SAC
Cc: Anderson, Bret A -FS; Sirski, Jerry -FS; McCorison, Mike -FS
Subject: RE: AES Huntington Beach Energy Project

Hello,

That is a mistake, he will be returning on June 19th.

Andrea Nick
Air Resource Specialist
701 N. Santa Anita Ave.
Arcadia, Ca. 91006
(626)574-5209
anick@fs.fed.us

From: Jerry.Salamy@CH2M.com [<mailto:Jerry.Salamy@CH2M.com>]
Sent: Thursday, June 13, 2013 1:36 PM
To: Jerry.Salamy@CH2M.com
Cc: Anderson, Bret A -FS; Nick, Andrea -FS; Sirski, Jerry -FS; McCorison, Mike -FS
Subject: RE: AES Huntington Beach Energy Project

Bret, Andrea, and Jerry,

In response to my email below, I received Mike's out-of-office message that he would be returning January 14th. If Mike is unavailable until January, can one of you please let me know to whom I should be corresponding with regarding the Huntington Beach Energy Project (located in Huntington Beach, CA).

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207

Fax 916-614-3407
Cell Phone 916-769-8919

From: Salamy, Jerry/SAC
Sent: Thursday, June 13, 2013 1:04 PM
To: 'McCorison, Mike -FS'
Cc: Anderson, Bret A -FS; Nick, Andrea -FS; Sirski, Jerry -FS
Subject: RE: AES Huntington Beach Energy Project

Mike,

I will forward you a copy of the application and all correspondence transmitted to the air district. Do you prefer an electronic or a hard copy.

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: McCorison, Mike -FS [<mailto:mmccorison@fs.fed.us>]
Sent: Tuesday, June 11, 2013 11:48 AM
To: Salamy, Jerry/SAC
Cc: Anderson, Bret A -FS; Nick, Andrea -FS; Sirski, Jerry -FS
Subject: RE: AES Huntington Beach Energy Project

This office has not received a copy of the PSD application.

Please let me know how you wish to proceed.

Thank you

Mike Mc Corison
Air Resource Specialist
Angeles National Forest
office 626-574-5286
cell 626-437-0624

From: Jerry.Salamy@CH2M.com [<mailto:Jerry.Salamy@CH2M.com>]
Sent: Wednesday, June 05, 2013 3:29 PM
To: McCorison, Mike -FS
Subject: AES Huntington Beach Energy Project

Mr. McCorison,

I am working with the AES Southland Development LLC (AES) on the Huntington Beach Energy Project (HBEP) located in Huntington Beach, California. AES submitted PSD permit application for HBEP to the South Coast Air Quality Management District (District) in June 2012 and EPA Region 9 in September 2012 (the EPA has subsequently delegated PSD review to the District in January 2013). The District deemed AES's PSD permit application conditionally complete in July 2012, pending receipt of additional data. Per District Rule 1703, the South Coast Air Quality Management District is required to provide a copy of the complete application (within 10 days after being deemed complete by the District) to

the EPA, the Federal Land Manager for any Class I area located within 100 km of the source, and to the federal official charged with direct responsibility for management of any lands within the Class I area. The project site has several Class I areas within the 100 km. Therefore, the purpose of this email is determine if the Forest Service has received a copy of HBEP's PSD application for review and to provide any materials the Service needs to assess project impacts on federal lands.

As a note, I will also be contacting Mr. Notar at the National Park Service with a similar request.

Please email or call with any questions you may have.

Thanks,

Jerry Salamy
Principal Project Manager
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Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

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[REDACTED]

[REDACTED]

[REDACTED]

From: Stephen O'Kane [stephen.okane@AES.com]
Sent: Friday, June 14, 2013 3:53 PM
To: Jillian Baker; Frohning, John/SEA
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee; Salamy, Jerry/SAC
Subject: RE: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

I think we would like to get it now and continue to seek some sort of approval or acknowledgement from Region 9 in the meantime.

More important to us right now is the HARP modeling inputs for the Exxon-Mobil refinery. We've received the permit information from this facility but really need the AB2588 source parameters. Can you give us any ETA on that data?

Thanks

Stephen O'Kane

From: Jillian Baker [mailto:jbaker@aqmd.gov]
Sent: Friday, June 14, 2013 3:50 PM
To: Stephen O'Kane; John.Frohning@CH2M.com
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee; Jerry.Salamy@CH2M.com
Subject: RE: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

Hi Stephen,

As a follow-up to my email, I wanted to let you know that I have the shipping lane information available, however, my approach (the source characterization and how the sources are to be modeled in AERMOD) has not yet been approved by EPA Region 9. Without their approval, I cannot guarantee that the shipping lane information will not change in the future. Please let me know if you would like to have this information now or would like to wait till we get our approval from EPA.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

From: Jillian Baker
Sent: Friday, May 31, 2013 5:22 PM
To: 'Stephen O'Kane'; John.Frohning@CH2M.com
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee; Jerry.Salamy@CH2M.com
Subject: RE: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

Hi Stephen,

I will be able to provide the shipping information within the next 2 weeks. However, for the facility information, it is my understanding that you will need to submit a public records request for that. We discussed the procedure on the conference call on 4/5/13 and I believe that John Frohning has requested the information and is in the process of collecting it. Once you have put together the information, you can send it to me in an email and I will review and let you know if the information is correct.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

From: Stephen O'Kane [<mailto:stephen.okane@AES.com>]
Sent: Friday, May 31, 2013 3:09 PM
To: Jillian Baker; John.Frohning@CH2M.com
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee; Jerry.Salamy@CH2M.com
Subject: RE: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

Thank you Jillian. Please let us know your ETA for providing the appropriate modeling emissions data and source parameters for the following:

[REDACTED]

AES Huntington Beach

Orange County Sanitation District (ID#29110) and Beta offshore (ID#166073) and Shipping lane activity off the coast (AQMD to provide you with the UTM coordinates, modeling parameters, and emission rates to be used)

Your attention to this matter is appreciated.

Stephen O'Kane

From: Jillian Baker [<mailto:jbaker@aqmd.gov>]
Sent: Friday, May 31, 2013 2:55 PM
To: John.Frohning@CH2M.com; Stephen O'Kane
Cc: Tom Chico; Chris Perri; Vicky Lee; John Yee; Andrew Lee
Subject: Written Comments on AES Huntington Beach [REDACTED] Modeling Protocol Addendums

Hi John and Stephen,

Here are our written comments on the Modeling Protocol Addendums you provided for the two AES projects. These modeling protocol addendums are for modeling related to the 1-hour NO₂ cumulative impact assessment, which is triggered because the project's NO₂ emissions exceed the SIL of 7.52 µg/m³.

AES Huntington Beach – Modeling Protocol Addendum (dated March 22, 2013)

- These comments (except for the last item) were discussed on our conference call on 4/5/13.
- When using PVMRM to calculate the conversion of NOx to NO2, an ambient ratio of 0.9 will have to be used. If you would like to use any other ratio, then justification needs to be provided as to the validity of that ratio.
- We will provide you with the background NO2 concentrations to use. (This was provided to you on 4/16/13)
- For the cumulative impact assessment, facilities within a 10-km radius will have to be considered.
- An analysis of the visibility impacts to Class II areas using VISCREEN needs to be provided. We suggested looking at the LADWP Scattergood comment letter and the response provided as a guide to what EPA is looking for. For example, looking at a state or regional park and using the IMPROVE network suggested visual range in the analysis.
- We will continue to work with you to narrow down the facilities which need to be included. We have proposed an approach to EPA and are waiting for their approval. This preliminary approach includes:
 - Two facilities to be included in the cumulative analysis - Orange County Sanitation District (ID#29110) and Beta offshore (ID#166073)
 - Shipping lane activity off the coast (I will provide you with the UTM coordinates, modeling parameters, and emission rates to be used)
 - The existing operations occurring at AES HB will be included unless that equipment will be removed and not operational when the new equipment becomes operational.
 - As soon as EPA approves this approach, we will let you know.

[REDACTED]

Please let me know if you have any questions.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Frohning, John/SEA
Sent: Friday, June 14, 2013 5:15 PM
To: Jillian Baker
Cc: Salamy, Jerry/SAC; Stephen O'Kane; Engel, Elyse/SJC; Tom Chico
Subject: AES HBEP [REDACTED] P Class II Area Visibility Assessment

Hi Jillian,

As we discussed earlier today, attached are the figures showing the Class II areas for a visibility assessment using the EPA recommended VISCREEN screening model. The parks and wilderness areas shown in these figures are the same as we discussed during our phone conversation earlier this week. The general procedures to determine visibility impacts would follow the approach outlined in *The Workbook for Plume Visual Impact Screening and Analysis (Revised)* (EPA-454/R-92-023, October 1992), with clarification of particular inputs below.

The background visual range for the Class II areas will be determined using the maps supplied on the IMPROVE website (<http://www2.nature.nps.gov/air/monitoring/visionresults.cfm>). The middle of the range will be used. Example, for Crystal Cove State Park is between 95km and 110km background visual range. Therefore, 102.5-km will be used.

If a Tier I approach exceeds the Class I criteria for Delta E and Contrast, a Tier II assessment would be conducted. The Tier II assessment would utilize the AQMD pre-processed meteorological data for use in ISC. The ISC ready data is available for download on the AQMD website. The ISC data contain the wind speed, wind direction, and stability class for each hour of the year. These data are required to create the Joint Frequency distribution tables to calculate the Tier II wind speed and stability class for each area analyzed.

A Technical memorandum will be prepared to describe the analysis and modeled results for each facility. The VISCREEN input and output files, the meteorological data, and the joint frequency distribution table calculations will also be supplied electronically along with the technical memorandum.

Please let me know if you have any questions or comments on the proposed approach above.

Have a great weekend.

Regards,
John Frohning
Air Quality Specialist
CH2M Hill

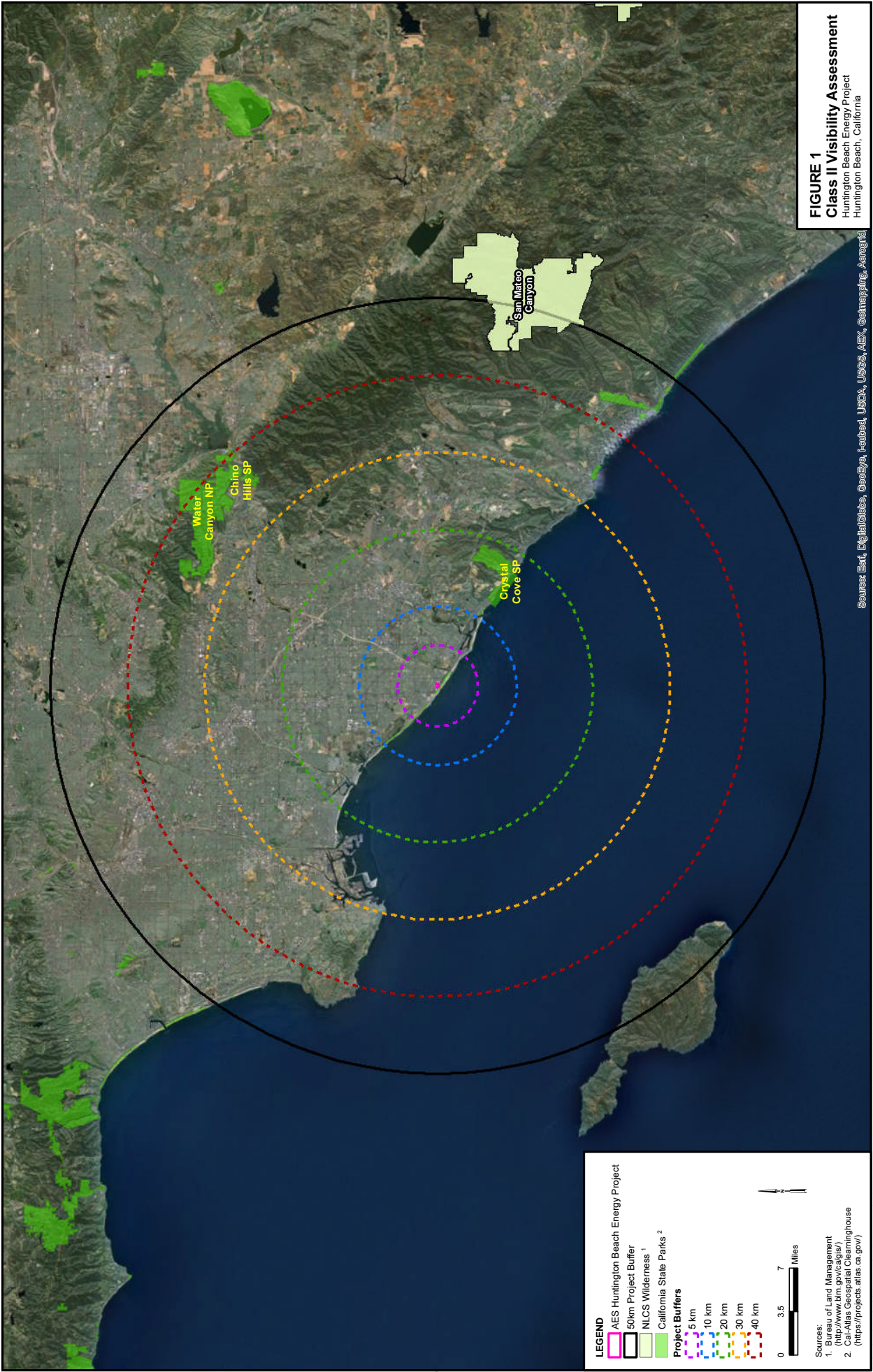


FIGURE 1
Class II Visibility Assessment
 Huntington Beach Energy Project
 Huntington Beach, California

Source: Esri, DigitalGlobe, GeoEye, Earthstar, USDA, USGS, AeroGRID, IGN, and the GIS User Community

LEGEND

- AES Huntington Beach Energy Project
- 50km Project Buffer
- NLCs Wilderness ¹
- California State Parks ²

Project Buffers

- 5 km
- 10 km
- 20 km
- 30 km
- 40 km

0 3.5 7 Miles

North Arrow

Sources:
 1. <http://www.nps.gov/ca/nlcs/>
 2. <https://projects.atlas.ca.gov/>

[REDACTED]

From: jbaker@aqmd.gov
Sent: Thursday, June 20, 2013 7:39 AM
To: John.Frohning@CH2M.com
Cc: Jerry.Salamy@CH2M.com; stephen.okane@AES.com; Elyse.Engel@ch2m.com; tchico@aqmd.gov; CPerri@aqmd.gov; VLee1@aqmd.gov; JYee@aqmd.gov; ALee@aqmd.gov
Subject: RE: AES HBEP [REDACTED] Class II Area Visibility Assessment

Good morning John,

We have reviewed your proposed approach and we find that the choice of Class II areas to be analyzed is reasonable and agree with the use of the Class I criteria to determine the significance of the visibility impacts. However, we do not agree with the use of ISC meteorological data to populate the joint frequency tables. The meteorological data used for AERMOD should be used, so that consistency is maintained with the meteorological data used for the other dispersion modeling aspects of this project.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

From: John.Frohning@CH2M.com [<mailto:John.Frohning@CH2M.com>]
Sent: Friday, June 14, 2013 5:15 PM
To: Jillian Baker
Cc: Jerry.Salamy@CH2M.com; stephen.okane@AES.com; Elyse.Engel@ch2m.com; Tom Chico
Subject: AES HBEP [REDACTED] Class II Area Visibility Assessment

Hi Jillian,

As we discussed earlier today, attached are the figures showing the Class II areas for a visibility assessment using the EPA recommended VISCREEN screening model. The parks and wilderness areas shown in these figures are the same as we discussed during our phone conversation earlier this week. The general procedures to determine visibility impacts would follow the approach outlined in *The Workbook for Plume Visual Impact Screening and Analysis (Revised)* (EPA-454/R-92-023, October 1992), with clarification of particular inputs below.

The background visual range for the Class II areas will be determined using the maps supplied on the IMPROVE website (<http://www2.nature.nps.gov/air/monitoring/vismonresults.cfm>). The middle of the range will be used. Example, for Crystal Cove State Park is between 95km and 110km background visual range. Therefore, 102.5-km will be used.

If a Tier I approach exceeds the Class I criteria for Delta E and Contrast, a Tier II assessment would be conducted. The Tier II assessment would utilize the AQMD pre-processed meteorological data for use in ISC. The ISC ready data is available for download on the AQMD website. The ISC data contain the wind speed, wind direction, and stability class for each hour of the year. These data are required to create the Joint Frequency distribution tables to calculate the Tier II wind speed and stability class for each area analyzed.

A Technical memorandum will be prepared to describe the analysis and modeled results for each facility. The VISCREEN input and output files, the meteorological data, and the joint frequency distribution table calculations will also be supplied electronically along with the technical memorandum.

Please let me know if you have any questions or comments on the proposed approach above.

Have a great weekend.

Regards,
John Frohning
Air Quality Specialist
CH2M Hill

425-292-3087
1100 112th Ave. NE
Suite 400
Bellevue, WA 98004

From: John.Frohning@CH2M.com
Sent: Friday, June 21, 2013 5:47 PM
To: Holladay.Cleveland@epamail.epa.gov
Cc: Jerry.Salamy@CH2M.com
Subject: PSD: Meteorological Data Representativeness

Hi Cleveland,

I have left a couple voice mails this week and was wondering what a good time would be to discuss meteorological data representativeness for a PSD project in southern California.

Specifically, we wanted to discuss the criteria in Appendix W and the AERMOD implementation guide for determining a representative offsite meteorological data station for PSD modeling applications.

Let me know what works for you the Week of June 24th. I have limited availability Monday, but I am generally available to discuss the rest of the week.

Thanks and have a great weekend.

Regards,
John Frohning
Air Quality Specialist
CH2M Hill

425-292-3087
1100 112th Ave. NE
Suite 400
Bellevue, WA 98004

From: mmccorison@fs.fed.us
Sent: Wednesday, June 26, 2013 11:18 AM
To: Jerry.Salamy@CH2M.com
Cc: baanderson02@fs.fed.us; jsirski@fs.fed.us; anick@fs.fed.us
Subject: RE: AES Huntington Beach Energy Project

Jerry received your materials today, thank you. I will not have time to initially review them until next week.

From: Jerry.Salamy@CH2M.com [<mailto:Jerry.Salamy@CH2M.com>]
Sent: Thursday, June 13, 2013 1:36 PM
To: Jerry.Salamy@CH2M.com
Cc: Anderson, Bret A -FS; Nick, Andrea -FS; Sirski, Jerry -FS; McCorison, Mike -FS
Subject: RE: AES Huntington Beach Energy Project

Bret, Andrea, and Jerry,

In response to my email below, I received Mike's out-of-office message that he would be returning January 14th. If Mike is unavailable until January, can one of you please let me know to whom I should be corresponding with regarding the Huntington Beach Energy Project (located in Huntington Beach, CA).

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Salamy, Jerry/SAC
Sent: Thursday, June 13, 2013 1:04 PM
To: 'McCorison, Mike -FS'
Cc: Anderson, Bret A -FS; Nick, Andrea -FS; Sirski, Jerry -FS
Subject: RE: AES Huntington Beach Energy Project

Mike,

I will forward you a copy of the application and all correspondence transmitted to the air district. Do you prefer an electronic or a hard copy.

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: McCorison, Mike -FS [<mailto:mmccorison@fs.fed.us>]
Sent: Tuesday, June 11, 2013 11:48 AM
To: Salamy, Jerry/SAC
Cc: Anderson, Bret A -FS; Nick, Andrea -FS; Sirski, Jerry -FS
Subject: RE: AES Huntington Beach Energy Project

This office has not received a copy of the PSD application.

Please let me know how you wish to proceed.

Thank you

Mike Mc Corison
Air Resource Specialist
Angeles National Forest
office 626-574-5286
cell 626-437-0624

From: Jerry.Salamy@CH2M.com [<mailto:Jerry.Salamy@CH2M.com>]
Sent: Wednesday, June 05, 2013 3:29 PM
To: McCorison, Mike -FS
Subject: AES Huntington Beach Energy Project

Mr. McCorison,

I am working with the AES Southland Development LLC (AES) on the Huntington Beach Energy Project (HBEP) located in Huntington Beach, California. AES submitted PSD permit application for HBEP to the South Coast Air Quality Management District (District) in June 2012 and EPA Region 9 in September 2012 (the EPA has subsequently delegated PSD review to the District in January 2013). The District deemed AES's PSD permit application conditionally complete in July 2012, pending receipt of additional data. Per District Rule 1703, the South Coast Air Quality Management District is required to provide a copy of the complete application (within 10 days after being deemed complete by the District) to the EPA, the Federal Land Manager for any Class I area located within 100 km of the source, and to the federal official charged with direct responsibility for management of any lands within the Class I area. The project site has several Class I areas within the 100 km. Therefore, the purpose of this email is determine if the Forest Service has received a copy of HBEP's PSD application for review and to provide any materials the Service needs to assess project impacts on federal lands.

As a note, I will also be contacting Mr. Notar at the National Park Service with a similar request.

Please email or call with any questions you may have.

Thanks,

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

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