

## DOCKETED

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| <b>Docket Number:</b>   | 12-AFC-02C   |
| <b>Project Title:</b>   | Huntington Beach Energy Project - Compliance                 |
| <b>TN #:</b>            | 215408   |
| <b>Document Title:</b>  | SCAQMD Response Comments for Huntington Beach Energy Project |
| <b>Description:</b>     | Response to Comments -HBEP                                   |
| <b>Filer:</b>           | Catherine Rodriguez  |
| <b>Organization:</b>    | South Coast Air Quality Management District                  |
| <b>Submitter Role:</b>  | Public Agency  |
| <b>Submission Date:</b> | 1/17/2017 4:42:51 PM   |
| <b>Docketed Date:</b>   | 1/17/2017  |



# South Coast Air Quality Management District

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

January 13, 2017

Mr. Harvey Eder  
Public Solar Power Coalition  
1223 Wilshire Blvd. #667  
Santa Monica, CA 90403

**SUBJECT:** Title V Public Hearing Request for AES Huntington Beach, LLC,  
Huntington Beach Energy Project (Facility ID 115389), located at 21730  
Newland St., Huntington Beach, CA 92646

Dear Mr. Eder:

Thank you for your request to the South Coast Air Quality Management District (SCAQMD) for a Title V Public Hearing for the AES Huntington Beach, LLC (AES), Huntington Beach Energy Project (HBEP) and submittal of Form 500-G, Title V - Hearing Request Form, dated December 2, 2016.

The SCAQMD is notifying you about our decision regarding your request for a Title V Public Hearing. As specified in Section III of the Form 500-G, the public hearing request is subject to SCAQMD's approval, and SCAQMD will hold a public hearing only if: 1) there is evidence that the proposed permit is not correct or is not adequate to ensure compliance with regulatory requirements, and 2) a hearing will likely provide additional information that will affect the drafting and/or issuance of the permit.

Please be advised that SCAQMD staff has carefully reviewed your Title V public hearing request, and has determined that the request does not meet the above-mentioned criteria. We have tried our best to decipher the hand written comments in Section III of the Form 500-G submitted by you. The SCAQMD's decision is based on the following considerations:

1. In your request, you indicated that "The electricity that would have produced by this dirty gas plant will/is replaced by solar energy ( PVO [photovoltaic], CSP [concentrated solar power] and hybrids) on land, water or rooftops." Utility-scale solar technologies need to be located in an area with high solar radiation, such as the desert areas of Riverside County, and require very large amounts of land. Solar radiation is available only during the daytime and has reduced availability on cloudy days. At the Huntington Beach site, the solar resource availability is further reduced by the marine layer and fog, which are common to the area. The number of photovoltaic panels that could be installed at the site is limited. Consequently, the electrical power that could be generated with photovoltaic panels is significantly less than the electrical power capacity of the existing power plant. The California Energy Commission, which is the

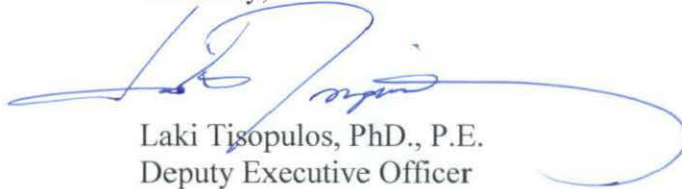
licensing authority for this project, has conducted a comprehensive review of all available alternative technologies for this project in its Preliminary Staff Assessment ([http://doCKETpublic.energy.ca.gov/PublicDocuments/12-AFC-02C/TN211973\\_20160624T152748\\_Preliminary\\_Staff\\_Assessment.pdf](http://doCKETpublic.energy.ca.gov/PublicDocuments/12-AFC-02C/TN211973_20160624T152748_Preliminary_Staff_Assessment.pdf)) and concluded that:

- “As California increasingly relies on wind and solar resources to meet its energy needs and environmental goals, other energy resources are increasingly called upon to ‘balance the system.’ ”
  - “In accordance with CEQA Guidelines section 15126.6(f)(2)(C), staff reviewed alternatives previously analyzed for the licensed HBEP design and related facilities, alternative technologies, and the “no project” alternative. Alternatives previously found to be infeasible would not now be feasible, and would not substantially reduce one or more significant effects of the licensed HBEP. Similarly, new information does not show alternatives which are considerably different from those analyzed in the previous staff assessment for the licensed HBEP that would substantially reduce one or more significant effects on the environment. Therefore, staff concludes that no supplementation to the 2014 Commission Decision is necessary for Alternatives.”
2. The notice was not mailed to the applicant before the hearing request was filed with the SCAQMD (date of mailing to the applicant was December 6, 2016). This rule 3006(a)(1)(F) requirement is clearly indicated on Form 500-G, in the public notice and was reiterated in Andrew Lee’s email (attached) to you on November 29, 2016 when he emailed you the Form 500-G.
  3. On Form 500-G, Section III – Basis for Requesting a Public Hearing, Item 2 – The following language in the proposed permit does not accurately reflect air quality regulatory requirements, was not completed.

Based on the above analysis, SCAQMD has determined that your request for a public hearing on this project does not meet the requirements in SCAQMD Rule 3006(a)(1)(F). Specifically, the request does not contain evidence that the proposed permit is not correct or is not adequate to ensure compliance with regulatory requirements, and SCAQMD has no evidence that a hearing will likely provide additional information that will affect the issuance of this permit. Therefore, the SCAQMD has decided not to hold a Title V public hearing for the AES Huntington Beach Energy Project.

Thank you again for your participation in the public review process and for your input in this case. If you have any questions regarding this letter, please call Mr. Andrew Lee, Senior Engineering Manager, at (909) 396-2643 or the undersigned at (909) 396-3123.

Sincerely,



Laki Tisopulos, PhD., P.E.  
Deputy Executive Officer  
Engineering and Permitting

LT:AYL:BC:VL

Attachments

cc: Stephen O'Kane, AES  
Gerardo Rios, EPA Region IX

**Bhaskar Chandan**

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**From:** Andrew Lee  
**Sent:** Tuesday, November 29, 2016 9:06 AM  
**To:** harveyederpspc@yahoo.com  
**Cc:** Bhaskar Chandan; Chris Perri  
**Subject:** Request for Title V - Hearing Request Form  
**Attachments:** 500-g-form.pdf

Good morning Harvey,

Please find the Title V – Hearing Request Form you had asked for over the telephone message you left on November 23, 2016. In the public notification, there is a website you could access that would give you the form you are requesting. Please carefully read and follow the directions on the form to submit your request and do not forget to submit this form to the applicant as well.

Best regards,  
Andrew

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Andrew Lee, P.E.  
Sr. Air Quality Engineering Manager  
So. Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765  
(909) 396-2643

RECEIVED

DEC 02 2016



South Coast Air Quality Management District

Form 500-G

Title V - Hearing Request Form



Mail To: SCAQMD Title V Administration, 21865 Copley Drive, Diamond Bar, CA 91765-4178, Tel. (909) 396-3385, www.aqmd.gov

This form is used to request a public hearing for a proposed Title V permit. To obtain copies of the public notices for Title V permits, or for assistance in completing the form, please call the Title V Hotline at (909) 396-3013. Hearing requests should be returned to: AQMD Title V Administration, 21865 Copley Drive, Diamond Bar, CA 91765-0830. In addition, a copy of this request MUST also be mailed by first class mail, on or before the date the hearing request is filed with the AQMD, to the facilities contact person identified in the Public Notice.

IMPORTANT - THE DEADLINE FOR RETURNING THE FORM IS 15 CALENDAR DAYS FROM THE DATE OF THE PUBLIC NOTICE. ALL INFORMATION MUST BE COMPLETE FOR THE HEARING REQUEST TO BE CONSIDERED BY THE AQMD. See AQMD Rule 3006(a)(1)(F).

Section I - Individual Requesting a Public Hearing

1. Name: HARVEY EDER 2. Date of Request: 12/02/16 (m/day/yr)

3. Company Name: P.S.P.C. PUBLIC SOLAR POWER COALITION (if applicable) 4. Title: SIF # Ex. Dir.

5. Mailing Address: 6223 WILSHIRE BLVD. # 667 (Street Address/PO Box) SANTA MONICA (City) CA 90403 (State) 90403 (Zip)

6. Daytime Telephone: (310) 393 2589 (Ext.) Fax:

7. Signature of Requester:

I hereby request that the AQMD hold a public hearing to address concerns with the Title V Permit referenced below. I have already mailed, by first class mail, a copy of this request to the contact person at the facility listed in the public notice.

Harvey Eder (Signature of Requester)

8. Use the information from the public notice to identify the facility for which a hearing is requested by completing the following:

Valid AQMD Facility ID: No. 115389 (Available on Permit or Invoice issued by AQMD) Notice Publication Date: 06/09/16 (m/day/yr) 07/09/16

Facility Name: AES HUNTINGTON BEACH, LLC / INCLUDED REDON BEACH PLANT (Business name of operator to appear on permit)

Facility Location: 21730 NEWLAND ST. (Street Address) HUNTINGTON BEACH (City) CA 92646 (State) 92646 (Zip)

Section II (Optional) - Alternate Person to Receive Further Notices

1. If applicable, provide the name and address of another person to whom all further notices should be sent, in lieu of the requester.

Name of Alternate Person:

Company Name: Title:

Mailing Address: (Street Address/PO Box) (City) CA (State) (Zip)

-Turn page over and complete Section III.-

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**Section II - Basis for Requesting a Public Hearing**

The reasons for requesting and holding a hearing must be specific to air quality regulations and based on the permitting action described in the public notice. The public hearing request is subject to AQMD approval. A public hearing will be held if: 1) there is evidence that the proposed permit is not correct or is not adequate to ensure compliance with regulatory requirements, and 2) a hearing will likely provide additional information that will affect the drafting and/or issuance of the permit.

Complete the following information: *CRESTEC SOLAR HEALTHIER CO. & SOLAR ENERGY'S LIFE CYCLE COST EFFECTIVE NOW - HAS BEEN SHOWN BY USING VARIOUS METHODS - DISCREPANCY FROM C/R/ THE 1-3% INTEREST RATES NOW ARE WE NEED A PUBLIC HEARING*

1.  I object to the issuance of this permit as proposed because:  
 THE ELECTRICITY THAT WOULD HAVE BEEN PROVIDED BY THIS DIE-UP GAS PLANT WILL BE REPLACED BY SOLAR ENERGY (PV) (BP + HYBRID) ON LAND, WATER OR ROOFTOPS. I HEREIN BY INCORPORATE BY REFERENCING THE WHOLE RECORD WRITTEN RECAL BY BOB CARROLL (BP); ALL MENTION AS WELL ON THE FORM 500 AVE IN BY THE STATE FOR OTHER PLANTS, EL SEGUNDO RANCHO BEACH & HUMMERTON BEACH. ALL LITIGATION WITH THE DIST + PLANS CARROLL 2008 - 2011 ALL SINKING DOWN ON SOLAR, PROS SUNLIGHT SCOPING MAY 18, 2010 WOULD REF + IN RECORD 2006 ASMP GO 2004 SOLAR ENERGY 80-85% 2004 JAN + JULY 2004. THAT 10-2 OF ASMP CIRC CH4 + 30% OVER LAST (24%) & 2000 PPM CO2 NOT WORKING & 400 PPM + N2O + DEFOLIANT 750 + 5000 PPM CO2. WE NEED SOLAR 80% EMISSION TOXIC IMMEDIATE TOTAL SOLAR CONVERSION

2.  The following language in the proposed permit does not accurately reflect air quality regulatory requirements:

| Permit Section | Page Number | Device or Condition Number | Objection<br>(Identify air quality regulatory requirements that are inconsistent with language in the permit) |
|----------------|-------------|----------------------------|---------------------------------------------------------------------------------------------------------------|
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