

## DOCKETED

<b>Docket Number:</b>	00-AFC-14C
<b>Project Title:</b>	El Segundo Power Redevelopment Project Compliance
<b>TN #:</b>	200346
<b>Document Title:</b>	Sierra Research response to SCAQMD Request for Additional Information
<b>Description:</b>	N/A
<b>Filer:</b>	Tiffani Winter
<b>Organization:</b>	Locke Lord, LLP
<b>Submitter Role:</b>	Applicant's Representative
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August 26, 2013

Via E-Mail and Hand Delivery

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Re: El Segundo Power Plant Project (00-AFC-14C)  
Applicant's Letter dated August 23, 2013  
to South Coast Air Quality Management District

Dear Sir/Madam:

On behalf of El Segundo Power Plant Project, enclosed please find for docketing Applicant's letter dated August 23, 2013, to South Coast Air Quality Management District.

Please don't hesitate to contact me if you have any questions regarding this filing.

Very truly yours,

A handwritten signature in blue ink that reads "John A. McKinsey".

John A. McKinsey

JAM:dh  
Enclosure

August 23, 2013



**sierra  
research**

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Kenneth L. Coats  
AQ Engineer II  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765

Subject: El Segundo Power Facility Modification Project – SCAQMD Permit Application

Dear Mr. Coats:

The following are NRG-El Segundo Power, LLC's responses to requests for additional information contained in the several emails sent between June 10, 2013 and June 18, 2013 from Ken Coats to George Piantka of NRG and Tom Andrews of Sierra Research.

These items were also listed in Mohsen Nazemi's email to George Piantka on August 14, 2013 regarding the March 2013 permit application for the proposed El Segundo Power Facility Modification Project. Sierra Research has provided written responses, addressing items on the list, to the District between May 17 and July 31, 2013. George provided partial responses via email to Mr. Nazemi on August 15 to the most recent list of District data requests. Please consider El Segundo Power's responses to date and our responses to the last of the District's open data requests.

*Request: Please provide the make, model, and number of duct burners.*

Response: The duct burners will be Coen-Todd LDRW-18 Gas Fired Duct Burners. There will be four burners.

*Request: Please have GE use the following table below as an example to providing the new commissioning schedule the 7FA.*

*Request: Please provide the information in the table below for the commissioning of the Trent 60 Simple Cycle Gas Turbines.*

Response: The requested tables are provided below. Please note that the days shown are operating days, not calendar days.



Day	Commissioning Activity	Hours	Fuel Rate (MMSCF/hr)	CT Load kW	Fuel Consumption (MMSCF)	NOx (lbs)	CO (lbs)	VOC (lbs)	PM10 (lbs)	SOx (lbs)	SCR(Y/N)
21	Steam Blow restoration, install SCR/CO Catalyst	0		0	0	0	0	0	0	0	N
22	Steam Blow restoration, install SCR/CO Catalyst	0		0	0	0	0	0	0	0	N
23	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
24	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
25	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
26	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
27	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
28	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
29	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
30	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
31	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
32	Establish Steam Purity	16	2.05	210,000	32.83	1692.90	513.88	120.58	154.25	70.35	N
33	Establish vacuum/HSRG Tuning/BOP Tuning	16	1.31	105,000	21.03	1081.27	234.60	68.33	152.87	45.06	N
34	Establish vacuum/BOP Tuning	16	1.31	105,000	21.03	1081.27	234.60	68.33	152.87	45.06	N
35	GT Load Test & Bypass Valve Tuning	16	1.31	105,000	21.03	1081.27	234.60	68.33	152.87	45.06	N
36	GT Load Test & Bypass Valve Tuning	16	1.31	105,000	21.03	1081.27	234.60	68.33	152.87	45.06	N
37	GT Load Test & Bypass Valve Tuning	16	1.31	105,000	21.03	1081.27	234.60	68.33	152.87	45.06	N
38	GT Load Test & Bypass Valve Tuning	16	1.31	105,000	21.03	1081.27	234.60	68.33	152.87	45.06	N
39	GT Load Test & Bypass Valve Tuning / Safety Valve Testing	16	1.68	157,500	26.91	1385.67	360.72	93.15	153.48	57.66	N
40	GT Load Test & Bypass Valve Tuning / Safety Valve Testing	16	1.68	157,500	26.91	1385.67	360.72	93.15	153.48	57.66	N
41	GT Base Load / Commissioning of Ammonia system	16	2.17	210,000	34.80	764.58	1435.82	207.58	161.22	74.60	Y
42	GT Load Test & Bypass Valve Tuning	12	2.23	210,000	26.72	611.41	1398.53	186.27	123.22	57.30	Y



Day	Commissioning Activity	Hours	Fuel Rate (MMSCF/ hr)	CT Load kW	Fuel Consumption (MMSCF)	NOx (lbs)	CO (lbs)	VOC (lbs)	PM10 (lbs)	SOx (lbs)	SCR(Y/N)
64	Performance/Reliability Testing	24	2.22	210,000	53.38	598.36	509.07	177.15	272.90	114.37	Y
65	Performance/Reliability Testing	24	2.23	210,000	53.42	671.24	1433.41	269.75	275.52	114.46	Y
66	No Operation	0		0	0	0	0	0	0	0	Y
67	No Operation	0		0	0	0	0	0	0	0	Y
68	No Operation	0		0	0	0	0	0	0	0	Y
69	SCE 72 Hour Test - Day 1	24	2.12	210,000	50.78	464.60	375.31	150.40	246.15	108.81	Y
70	SCE 72 Hour Test - Day 2	24	2.08	210,000	50.00	448	304	144	244	107	Y
71	SCE 72 Hour Test - Day 3	24	2.12	210,000	50.82	537.48	1299.65	242.99	248.77	108.89	Y
<b>TOTALS</b>		<b>800</b>				<b>46,126</b>	<b>33,636</b>	<b>6,433</b>	<b>8,011</b>	<b>3,188</b>	

Table 2. Commissioning Schedule for Units 11 and 12 (each)

Day	Commissioning Activity	Hours	Heat Rate (MMBtu <sub>LHV</sub> /hr)	Fuel Rate (MMSCF/hr)	CT Load kW	Heat Input (MMBtu)	Fuel Consumption (MMSCF)	NOx (lbs)	CO (lbs)	VOC (lbs)	PM10 (lbs)	SOx (lbs)	SCR(Y/N)
1	First Fire and Idle Running	18	675	0.73	0	12,158	13.1	1,141	6,234	870	199	27	N
2	Synchronization of the unit	16	590	0.63	0	9,442	10.2	705	3,174	237	121	10	N
3-7	Tuning – Baseload Running	64	535	0.58	45,800	34,211	36.8	4,941	13,270	848	684	38	N
8	Commissioning of Inlet Fogging and ISI	24	509	0.55	22,900	12,223	13.1	806	3,855	253	131	13	N
9	SCR Tuning	24	415	0.45	45,800	9,959	10.7	2,405	658	73	266	11	Y
10	RATA Test	12	402	0.43	45,800	4,818	5.2	92	172	21	67	5	Y
11	Performance Test	24	402	0.43	45,800	9,636	10.4	184	343	42	134	11	Y
12	24-hr Reliability Test	24	395	0.42	45,800	9,474	10.2	148	181	25	127	10	Y
<b>TOTALS</b>		206						10,421	27,886	2,370	1,729	126	



El Segundo Power appreciates the efforts that the District has made in its review of the ESPFM application. If you have any questions please contact George Piantka at 760-710-2156, or me at 916-444-6666.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Rubenstein". The signature is fluid and cursive, with a long horizontal stroke at the end.

Gary Rubenstein

cc: Craig Hoffman, CEC Project Manager  
George Piantka, NRG  
Ken Riesz, NRG  
Steve Odabashian, NRG