

DOCKETED

Docket Number:	12-AFC-03
Project Title:	Redondo Beach Energy Project
TN #:	202813
Document Title:	AES PDOC Comments
Description:	AES's Comments on the SCAQMD's PDOC
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Organization:	CH2M HILL
Submitter Role:	Applicant Consultant
Submission Date:	7/25/2014 12:32:58 PM
Docketed Date:	7/25/2014



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July 25, 2014

Vicky Lee
Air Quality Engineer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 90803

Re: Redondo Beach Energy Project Comments on the Preliminary Determination of Compliance (Facility ID 115536)

Dear Ms. Lee:

AES Redondo Beach, LLC (AES) appreciates the South Coast Air Quality Management District's (SCAQMD) efforts in preparing the Redondo Beach Energy Project (RBEP) Preliminary Determination of Compliance (PDOC) and respectfully submits the following comments. The comments are presented by page number, section number, Table number, and/or paragraph, as applicable. When revisions to Conditions are proposed, a copy of the applicable portion of the condition is provided with underline and strike-out used to identify insertions and deletions, respectively.

Permit to Operate, Page 19, Condition F52.1 – The description of which existing Redondo Beach Generating Station Units are being shutdown to enable RBEP is inconsistent with the correct presentation in Permit to Construct Table 1A (page 37). As presented in Table 1A, Redondo Beach Generating Station Units 5 and 7 (total of 655 megawatts) are being shutdown to enable RBEP (546.3 megawatts) to comply with SCAQMD Rule 1304(a)(2). AES has the same comment on the following pages of the Permit to Construct: page 14, Condition F52.1; Permit to Construct, Page 36, Background and Facility Description, 2nd full paragraph; page 84, Rule 1303(b)(1) – Modeling; page 93, Analysis; and page 96, Rule 1313 – Permits to Operate. Please revise these conditions to reflect the shutdown of Redondo Beach Generating Station Units 5 and 7.

Permit to Operate, Page 35, Condition E193.4 – This condition appears to limit the commissioning period to a maximum of 491 hours. AES suggests incorporating the following clarification into the condition as the 491 commissioning hours represent only the hours during which the turbines emit air emissions. AES has the same comment on page 24 of the Permit to

Construct, Condition 193.4.

The commissioning period shall not exceed 491 hours of fired operation for each turbine...

Permit to Construct, Page 70, Toxic Pollutants, Annual Operating Hours – The equation for annual operating hours should be revised as follows.

Annual operating hours = 5900 hr (normal operating) + 470 hr (~~start-ups~~sduct burner) + 465 hr (start-ups/shutdowns) = 6835 hr

Permit to Construct, Page 72, Greenhouse Gases (GHG), Annual SF₆ Emission Rate – The calculation for the annual SF₆ emission rate should be revised as follows.

$(1.56 \text{ lb/yr SF}_6)(22,800 \text{ lb CO}_{2e}/\text{lb SF}_6) = 37,28435,568 \text{ lb/yr} = 17.8 \text{ tpy CO}_{2e}$

Permit to Construct, Page 75, Rule 212 – Standards for Approving Permits, Table 26 – Rule 212(c)(2) Applicability – Please change the “Yes” to a “No” under the heading “Lead.”

Permit to Construct, Page 83, Commissioning, Startups and Shutdowns, 2nd paragraph, last sentence – Please revise this sentence as follows.

To limit commissioning emissions, condition no. E193.4 limits the commissioning period to 491 fired hours per turbine.

Permit to Construct, Page 86, Table 29 – Modeled Stack Parameters – Start Up/Shutdowns and Normal Operation – Please verify the exhaust velocity rates presented are consistent with the exhaust velocities presented in the Application for Certification Appendix 5.1C, Table 5.1C.4.

Permit to Construct, Page 98, Table 34 – Rule 1325 Applicability – The RBEP annual SO₂ emissions presented in Table 34 are inconsistent with the RBEP annual SO₂ emissions presented in Permit to Construct Table 23 (page 67). Please revise the RBEP annual SO₂ emissions presented in Table 34 to 6.45 tons per year.

Permit to Construct, Page 110, Step 3: Rank Remaining Control Technologies, 2nd paragraph – This paragraph indicates that the IDC Bellingham project is included in Permit to Construct Table 37 (page 111). However, Table 37 does not include a listing for the IDC Bellingham project.

Permit to Construct, Page 175, GHG Efficiency, net (with degradation), Compliance Demonstration – The compliance demonstration indicates that the applicable Emission Performance Standard is 1000 lb CO₂/MWhnet. However, as noted on page 172 of the Permit to Construct, the Emission Performance Standard is 1100 lb CO₂/MWhnet. Please revise accordingly.

Ms. Vicky Lee
July 25, 2014
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If you have any additional questions, please contact either me or Jerry Salamy (916-286-0207).

Sincerely,

A handwritten signature in blue ink, appearing to read "S. O'Kane". The signature is fluid and cursive, with the first name "Stephen" and last name "O'Kane" clearly legible.

Stephen O'Kane
Vice-President
AES Southland Development, LLC

cc: J. Didlo/AES
G. Wheatland/ESH
J. Salamy/CH2M HILL
S. Madams/CH2M HILL