

DOCKETED

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South Coast Air Quality Management District

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June 2, 2015

Mr. Keith Winstead, Project Manager
California Energy Commission
1516 Ninth Street, MS-12
Sacramento, CA 95814

SUBJECT: Comments on Preliminary Staff Assessment for the Redondo Beach Energy Project (RBEP)(12-AFC-03), located at 1100 N. Harbor Dr., Redondo Beach, CA 90277

Dear Mr. Winstead:

The South Coast Air Quality Management District (SCAQMD) has reviewed the Preliminary Staff Assessment (PSA) for the RBEP (12-AFC-03), published July 28, 2014. Following are our comments. We hope that these comments assist the CEC's preparation of the Final Staff Assessment (FSA).

Offset Requirements

1. On page 4.1-35, the Air Quality Table 28 Offset Requirements (tpy) includes a row entitled "1304 Exemption Credits." The "credits" are listed as 254.2 tpy VOC, 77 tpy PM₁₀/PM_{2.5}, and 28.5 tpy SO_x. The PSA does not explain the meaning or derivation of these values.

As discussed on pages 35-36 of the SCAQMD Preliminary Determination of Compliance (PDOC), the Rule 1304(a)(2) exemption requires a comparison of the maximum electrical power rating (in megawatts) of the replacement equipment with that of the replaced equipment, not a comparison of emissions. Accordingly, the PDOC does not present a comparison of emissions. If appropriate at a later date, the complex task of calculating credits will be performed by SCAQMD.

BACT Limits

2. Page 4.8-3 of the PSA indicates volatile organic compounds (VOCs) would be limited to 1 ppmv. As discussed on pg. 80 of the PDOC, the proposed/guaranteed levels provided by the applicant is 1 ppm (1-hr averaging) without duct burners and 1 ppm (3-hr averaging) with duct burners based on a top-down BACT analysis including non-SCAQMD and SCAQMD combined-cycle turbine projects. The 1 ppmvd at 15% O₂ BACT levels is based on non-SCAQMD projects for which the VOC test method is **not** recognized by the SCAQMD. The proposed turbines will be unable to meet a 1 ppmvd limit using the SCAQMD-approved test method. The BACT/LAER limit for VOC

remains 2 ppm at 15% O2 (1-hr averaging), without or with duct burner. AES has accepted the SCAQMD's determination.

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) 396-2662.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mohsen Nazemi', written over a horizontal line.

Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering and Compliance

MN:AYL:CDT:JTY:VL

cc: Jillian Wong, SCAQMD