

DOCKETED

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Project Title:	Alamitos Energy Center
TN #:	216411
Document Title:	AES's Suggested Edits to AEC PMPD Greenhouse Gas Table 3
Description:	N/A
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Organization:	CH2M HILL
Submitter Role:	Applicant Consultant
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March 7, 2017

Mr. Kenneth Celli,
Hearing Officer
California Energy Commission
1516 9th Street
Sacramento, CA 95833

**Re: Alamos Energy Center Presiding Member's Proposed Decision Greenhouse Gas Table 3
(13-AFC-01)**

Dear Hearing Officer Celli:

During the March 1, 2017 Alamos Energy Center Presiding Member's Proposed Decision (PMPD) Committee Conference discussion on the Applicant's comments to PMPD Greenhouse Gas Table 3, the California Energy Commission (CEC) Staff suggested that they work cooperatively with the Applicant to draft language to replace the portion of Greenhouse Gas Table 3 in question. CEC Staff and the Applicant have agreed to the attached language resolving the Applicant's comments on PMPD Greenhouse Gas Table 3 and suggest this language be used to replace the information in the 2nd row of Greenhouse Gas Table 3.

Please let me know if you have any additional questions.

Sincerely,

A handwritten signature in blue ink that reads 'S. O'Kane'.

Stephen O'Kane
Vice-President
AES Alamos Energy, LLC

Attachment

cc: Jennifer Didlo/AES
Jeff Harris/ESH
Jerry Salamy/CH2M
Keith Winstead/CEC

APPLICABLE LORS	DESCRIPTION OF LORS	DISCUSSION/CONCLUSIONS
<p>[2] 40 Code of Federal Regulations (CFR) Parts 51 and 52</p>	<p>A new stationary source that emits more than 100,000 TPY of GHGs <u>(and other criteria pollutants for which the project area attains federal air quality standards)</u> is considered to be a major stationary source subject to PSD requirements. As of June 23, 2014 the U.S. Supreme Court has invalidated this requirement as a sole PSD permitting trigger. However, for permits issued on or after July 1, 2011, PSD applies to GHGs if the source is otherwise subject to PSD (for another regulated NSR pollutant) and the source has a GHG potential to emit (PTE) equal to or greater than 75,000 TPY CO₂e. The proposed AEC is subject to GHG PSD analysis.</p>	<p><u>Compliant. Compliant. 40 CFR Parts 51 and 52 establish procedures for allowing new sources of air pollution to be constructed or existing sources to be modified in areas classified as attainment. Prevention of Significant Deterioration (PSD) requirements apply on a pollutant specific basis for major stationary sources. The AEC would be considered one of 28 source categories that are subject to PSD requirements for attainment pollutants if facility annual emissions exceed 100 tons per year. The AEC would exceed the 100 tons per year threshold for NO_x and CO and is subject to the PSD analysis requirements. AEC would also be a major stationary source of GHG (exceeding 100,000 tons per year) which requires a PSD analysis for GHGs. The facility owner submitted the PSD application to the SCAQMD and the SCAQMD issuance of the Final Determination of Compliance outline AEC's compliance with the requirements of 40 CFR Parts 51 and 52.</u>³³</p> <p>The GE 7FA.05 combined-cycle turbines are also expected to comply with the federal Standards of Performance for Greenhouse Gas Emissions (or Clean Air Act section 111[b]) of 1,000 pounds of carbon dioxide per gross megawatt hour (lb. CO₂/MWh, gross) or (1,030 lb.CO₂/MWh, net) for base load natural gas fueled turbines. The GE LMS-100PB simple-cycle turbines are expected to comply with the limit of 120 lb CO₂ per million Btus (MMBtu) of natural gas heat input for non-base load natural gas-fueled turbines. Should the combined-cycle turbines operate as non-base load units, compliance with the 120 lb. CO₂ per MMBtu limit would be expected by the use of natural gas. Conditions of Certification AQ-E7 and AQ-E8 ensure compliance with the new standards.³³</p>