

## DOCKETED

<b>Docket Number:</b>	00-AFC-14C
<b>Project Title:</b>	El Segundo Power Redevelopment Project Compliance
<b>TN #:</b>	202014
<b>Document Title:</b>	South Coast Air Quality Management District April 2, 2014 Correspondence
<b>Description:</b>	Petition
<b>Filer:</b>	Dee Hutchinson
<b>Organization:</b>	Locke Lord LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	4/11/2014 3:32:58 PM
<b>Docketed Date:</b>	4/11/2014



Attorneys & Counselors

500 Capitol Mall, Suite 1800  
Sacramento, CA 95814  
Telephone: 916-930-2500  
Fax: 916-930-2501  
www.lockelord.com

John A. McKinsey  
Direct Telephone: 916-930-2527  
Direct Fax: 916-720-0443  
jmckinsey@lockelord.com

April 11, 2014

VIA E-FILING


El Segundo Energy Center Petition to Amend (00-AFC-14C) Siting Committee  
Commissioner Karen Douglas – Presiding Member  
Commissioner Janae A. Scott – Associate Member  
Paul Kramer – Hearing Officer  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: El Segundo Energy Center Petition to Amend (00-AFC-14C)  
South Coast Air Quality Management District Correspondence

Dear Committee Members:

On behalf of the El Segundo Energy Center LLC ("**ESEC LLC**"), enclosed please find for docketing the South Coast Air Quality Management District's letter to ESEC LLC dated April 2, 2014. Please contact me or my colleague Allison Harris if there are questions about the enclosure.

Locke Lord LLP

  
By: \_\_\_\_\_  
John A. McKinsey  
Attorneys for El Segundo Energy Center LLC

JAM:awph

Enclosure



# South Coast Air Quality Management District

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

April 2, 2014

Mr. George L. Piantka, P.E.  
Director, Environmental Business  
NRG West  
5790 Fleet Street Suite 200  
Carlsbad, CA 92008

Subject: El Segundo Power Facility Modification (ESPFM) Project located at 301 Vista Del Mar, El Segundo, CA 90245 (Facility ID No.115663) Auxiliary Boiler BACT Requirements

Dear Mr. Piantka:

The South Coast Air Quality Management District (SCAQMD) staff is currently evaluating the permit applications for the proposed modifications to the El Segundo Power Facility Modification Project (ESPFM). As you are aware, the project will require a source of steam to utilize the rapid start capability of the GE 7FA combined cycle gas turbine. As such the proposed project will include a 36 MMBTU/hr auxiliary boiler which will be fired with pipeline quality natural gas.

Before completion of our evaluation and the Final Determination of Compliance (FDOC), the SCAQMD must determine that the new, proposed auxiliary boiler will comply with the Major Source BACT requirements. The Major Source BACT requirements for natural gas fired watertube boilers is 5 ppmv NO<sub>x</sub> and 50 ppmv CO, each measured at 3% O<sub>2</sub>, dry basis. The 5 ppmv NO<sub>x</sub> determination was based on Rule 1146 BARCT requirements for Group I and II Units which are greater than 20 MMBTU/hr. Furthermore, two similar watertube boilers permitted at LAC/USC Medical Center in August 2012, both of which are in in current operation, are using a low NO<sub>x</sub> burner and an SCR unit to achieve the Major Source BACT limits of 5 ppmv NO<sub>x</sub> and 50 ppmv CO.

This information was previously communicated to you in an email and phone call dated January 8, 2014. Therefore, please submit evidence by May 1, 2014 that the proposed auxiliary boiler will comply with the above Major Source BACT limits such that we can finalize the FDOC and permits for the proposed project. If your determination requires installation of additional equipment which requires an Permit to Construct from SCAQMD, please submit the necessary applications by May 1, 2014. Furthermore, any changes to the scope should be conveyed to your CEC contact for their review and evaluation.

If you have any questions or need additional information, please contact Mr. John Yee ([jyee@aqmd.gov](mailto:jyee@aqmd.gov)) at (909) 396-2531 or Mr. Kenneth L. Coats ([kcoats@aqmd.gov](mailto:kcoats@aqmd.gov)) at (909) 396-2527.

Sincerely,

Andrew Lee, P.E.

Senior AQ Engineering Manager

Energy/Public Services/Waste Management/Terminals

MN:AYL:CDT:JTY:klc  
cc: Mary Dyas, CEC