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Project Title:	Palen Solar Power Project - Compliance
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Document Title:	SCAQMD's Comments to the Final Staff Assessment for Palen Solar Generation
Description:	FSA comments from SCAQMD
Filer:	John Yee
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South Coast Air Quality Management District

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November 22, 2013

Ms. Christine Stora, Project Manager
California Energy Commission
1516 9th Street
Sacramento, CA 95814-5512

Subject: Final Staff Assessment for the Palen Solar Electric Generation System, Part C, Facility ID# 174021 (09-AFC-07)

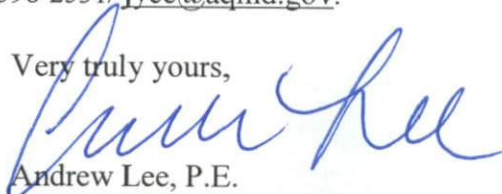
Dear Ms. Stora:

The South Coast Air Quality Management District (SCAQMD) has received and reviewed the Final Staff Assessment for the Palen Solar Electric Generation System Part C. The SCAQMD has the following comments on the Document.

1. On page 4.1-22 Table 9, PM10 for the auxiliary boilers should be 1.68 not 1.73 tons/yr. Table of annual emissions, page 35 of the PDOC lists 1683.93 lb/yr per boiler or 1.68 tons per year for the two boilers.
2. On page 4.1-29 for the small ice the NO_x+VOC should be 2.76 not 2.31 g/bhp-hr. Appendix H of the PDOC lists the NO_x + VOC as 2.49+0.27 or 2.76 g/bhp-hr.
3. On page 4.1-29 for the fire pump the CO should be 0.5 not 2.6 g/bhp-hr. Appendix H of the PDOC lists the CO as 0.5 g/bhp-hr.
4. On page 4.1-58 table 12, condition no. K67.4 should be 5 not 3 years. The PDOC did list the 3 years in error on pages 95 and 97. The facility permit condition K67.4 does list the correct years.
5. On page 4.1-84 condition no. AQ55 on IC engine record keeping should be 5 not 3 years. The PDOC did list the 3 years in error on page 95 and 97. The facility permit condition K67.4 does list the correct years.
6. On page 4.1-101 table 3 the auxiliary boilers CO_{2e} should be 37694 not 37959 tons per year. On page 54, the table listing the GHG Emissions Rates for Mass and CO_{2e}, the far right column on the PDOC lists net tons/yr per boiler.
7. On page 4.1-101 table 3 the night preservation boilers CO_{2e} should be 5,928 not 5,922 tons per year. On page 54, the table listing the GHG Emissions Rates for Mass and CO_{2e}, the far right column on the PDOC lists net tons/yr per boiler.

If you questions or comments regarding this project, please contact Mr. Roy Olivares at (909) 396-2208/rolivares@aqmd.gov or Mr. John Yee at (909) 396-2531/jyee@aqmd.gov.

Very truly yours,



Andrew Lee, P.E.
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AYL:CT:JTY:rdo