

DOCKETED

Docket Number:	12-AFC-02
Project Title:	Huntington Beach Energy Project
TN #:	202292
Document Title:	Applicant's Comments Dated 5-5-2014 re SCAQMD PDOC Comments
Description:	Applicant's Comments dated 5-5-2014 re SCAQMD PDOC Comments
Filer:	Kimberly Hellwig
Organization:	Stoel Rives LLP
Submitter Role:	Applicant
Submission Date:	5/5/2014 2:24:18 PM
Docketed Date:	5/5/2014



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May 5, 2014

Mr. Mohsen Nazemi, P.E.
Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

**Subject: Huntington Beach Energy Project Permit Application (Facility ID# 115389)
Preliminary Determination of Compliance Comments**

Dear Mr. Nazemi:

AES Huntington Beach, LLC (AES) appreciates the South Coast Air Quality Management District's (SCAQMD) efforts in preparing the Huntington Beach Energy Project (HBEP) Preliminary Determination of Compliance (PDOC) and respectfully submits the following comments.

General Comment: Please consistently describe that HBEP is subject to PSD review for oxides of nitrogen (NO_x), carbon monoxide (CO), particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀), and greenhouse gases (GHG).

Draft Air Permit, Section H, Page 21 – Gas Turbine No. 2B

- **Comment:** Gas Turbine No. 2B does not include a stack identification number consistent with the other gas turbines.

Draft Air Permit, Condition F2.1, Page 28 – Facility Conditions

- **Comment:** AES requests the ability to demonstrate compliance with this facility emission limit using source test results and requests the following change to this condition.

For purposes of demonstrating compliance with the 100 tons per year limit the operator shall sum the PM_{2.5} emissions for each of the major sources at this facility by calculating a 12 month rolling average using the calendar monthly fuel use data and following emission factors for each turbine PM_{2.5} = 3.36 lbs/mmcf with no duct firing and PM_{2.5} = 5.52 lbs/mmcf with duct firing or SCAQMD-approved source test-based emission factors.

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PDOC, Appendix P, Page 133

Comment: The first year NOx RTCs value of 314,054 pounds does not reflect the emissions associated with the table above. The first year NOx RTCs required should be 320,052 pounds.

If you require further information, please do not hesitate to contact me at 562-493-7840.

Sincerely,

A handwritten signature in black 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
Manager
AES Huntington Beach, LLC

cc: Chris Perri/SCAQMD
Robert Mason/CH2M HILL
Jennifer Didlo/AES
Melissa Foster/Stoel Rives
Jerry Salamy/CH2M HILL
Felicia Miller/CEC