

## DOCKETED

<b>Docket Number:</b>	12-AFC-03
<b>Project Title:</b>	Redondo Beach Energy Project
<b>TN #:</b>	202837
<b>Document Title:</b>	Luc Imberechts Public Comments - Regarding Air Quality Concerns
<b>Description:</b>	Email to Pat Kelly and Andrew Lee of SCAQMD, from Luc Imberechts, RE: Air Quality Concerns related to the Redondo Beach Energy Project
<b>Filer:</b>	April Dearbaugh
<b>Organization:</b>	CEC / Luc Imbechts
<b>Submitter Role:</b>	Commission Staff
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*Comments Received From: Luc Imberechts  
Email Sent To: Pat Kelly, July 29, 2014  
Submitted On: 07/29/14  
Docket Number: 12-AFC-03*

Dear Patricia Kelly,

I have been following the regular updates the CEC has been sending about the RBEP.

Here are the comments I sent to Mr. Andrew Lee of the SCAQMD:

*Dear Mr. Andrew Lee,*

*Following the recent notice of your agency regarding the Redondo Beach Energy Project (RBEP), I would like to submit the following comments.*

*1. I believe the project description should clearly mention that the present AES Redondo Beach facility has been operating at very low capacity and only intermittently in the last decade. The present project is not a mere replacement of older equipment by new, more efficient equipment. It is possibly the relaunch of a substantial production of electricity on a site that is now surrounded by a high density population in unusual close proximity. The reality of the site is very different than in the fifties when the existing plant was built or even before when the site was selected as a power plant.*

*2. Could you explain what you mean by "during normal operation" on page 2 of your document? During the review process organized by the California Energy Commission, AES has been, in my opinion, unclear about their intention referring to a set of numbers calculated at a theoretical 25% usage of total capacity at first, then later mentioning a possible 82% utilization rate, and finally stating that they do not decide the level of utilization but in this case Southern California Edison would decide based on their needs.*

*3. Could you explain the risk of the presence of an ammonia storage tank for the people living and working or going to school in the area of the plant?*

*4. Why is your agency using a modeling approach to estimate potential level of pollutants in this case? The technology used is not new or unique to this project. Therefore, it should be relatively easy but also more accurate to use measured values at similar sites? And then, it would be possible to compare them with present values observed at the RBEP location.*

*5. What are the consequences for a power plant in California in case of violation of the respect of the maximum emission levels of the various pollutants?*

*6. Could you show the expected emissions in the future compared to the present observed levels at the site?*

*7. Are you sure that the following statement in your notice is correct? "The proposed RBEP will not result in an increase in the electrical generating capacity since the total electrical generating capacity of the new RBEP is offset by the generating capacity it replaces." Are you taking into consideration the actual generating capacity that has been utilized in the recent years?*

*8. Does your agency look into the risk of so-called micro-pollutants? I read in the public comments that several neighbors have been suffering of asthma. Do you have data on this concerning possibility?*

*Thank you for your consideration.*

*Luc Imberechts*

*cc. California Energy Commission*

Thank you.

Luc Imberechts