DOCKETED							
Docket Number:	07-AFC-06C						
Project Title:	Carlsbad Energy Center - Compliance						
TN #:	202984						
<b>Document Title:</b>	Revised Table 5.1-7R, Application for an Authority to Construct						
Description:	Petition to Amend						
Filer:	Dee Hutchinson						
Organization:	Locke Lord LLP / John A McKinsey						
Submitter Role:	Applicant Representative						
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August 26, 2014

## VIA E-FILING

Carlsbad Energy Center Project (07-AFC-06C) Mike Monasmith, Project Manager Paul Kramer, Hearing Officer California Energy Commission 1516 Ninth Street, MS-15 Sacramento, CA 95814-5512

Re: Carlsbad Energy Center Project Petition to Amend (07-AFC-06C) Revised Table 5.1-7R, Application for an Authority to Construct

Dear Mr. Monasmith:

On May 13, 2014, Carlsbad Energy Center LLC ("**Project Owner**") filed at the California Energy Commission a copy of Project Owner's application to the San Diego Air Pollution Control District (the "**Air District**") for authority to construct (TN 202326) (the "**Application**") the modified facility proposed in the Petition to Amend the Carlsbad Energy Center Project (07-AFC-06C) (the "**PTA**"). While responding to a question from the Air District about ambient air quality, Project Owner's representative discovered that recent changes had been made to the background ambient PM2.5 values at the California Air Resources Board and Environmental Protection Agency websites. Project Owner's representative updated Table 5.1-7R of the Application accordingly to reflect these revised values, and provided this table to the Air District yesterday.

Please contact me or Tom Andrews at Sierra Research (916-444-6666) if you have questions.

Locke Lord LLP

John A. McKinsey

Attorneys for Carlsbad Energy Center LLC

JAM:awph

**Enclosure** 

SAC 800955v.1

TABLE 5.1-7R (Revised 8/25/14) PM $_{2.5}$  LEVELS IN SAN DIEGO COUNTY, ESCONDIDO MONITORING STATION, 2003 – 2012 ( $\mu g/m^3$ )

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Note	
Highest 24-Hour Average	69.2	67.3	43.1	40.6	126.2	44	64.9	48.4	<del>69.8</del>	70.7	[1]	
(Federal)		07.3				31.3		33.3	<u>27.4</u>			
Number of Days Exceeding:											<u> </u>	
Federal Standard	3	2	0	*	1	11	*	2	2	3	1	[1]
(35 μg/m³, 24-hour)		9		1	11		1	0	0	1	[1]	
98 <sup>th</sup> Percentile 24-hour	33.9	37.4	*	28.3	37.7	*	<del>25.2</del>	<del>26.6</del>	<del>27.4</del>	21.4	[4]	
Average		57.4					<u>24.5</u>	<u>21.7</u>	22.0	<u>19.9</u>	[1]	
98 <sup>th</sup> Percentile 24-hour, 3	38	20	27	*	*	*	*	*	*	<del>26</del>	<del>25</del>	[4 2]
year average		37	*	*	*	*	•	•	23	21	[1,2]	
Annual Arithmetic Mean	14.2	14.1	*	11.5	13.3	12.4	13.5	<del>12.7</del>	<del>13.2</del>	<del>10.8</del>	[4]	
							*	*	10.4	*	[1]	

<sup>\*</sup> There were insufficient data available to determine the value.

EPA lowered the 24-hour standard to 35  $\mu$ g/m3 on December 17, 2006. Compliance with this standard is based on the 3-year average of the 98th percentile daily concentrations.

<sup>1.</sup> Source: CARB ADAM Website (http://www.arb.ca.gov/adam/index.html)
Generate summary table under "Top 4 Measurements and Days Above the Standard" option, and all values are obtained form the table.

<sup>2.</sup> Values of "98th Percentile 24-hour, 3 year average" are the "PM2.5 National 2006 24-Hour Standard Design Value" in the summary table generated on CARB ADAM. The "PM2.5 National 2006 24-Hour Standard Design Value" is the average of consecutive National 2006 98th Percentiles over three years, according to the definition given at: http://www.arb.ca.gov/adam/explains/pm251yr98thdesc06.html.