

## DOCKETED

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<b>Project Title:</b>	Blythe Energy Project Compliance & Blythe Transmission Line Modification
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<b>Document Title:</b>	Staff Analysis of Amendment Proposal 04-08-2015
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<b>Organization:</b>	California Energy Commission
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**CALIFORNIA ENERGY COMMISSION**

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SACRAMENTO, CA 95814-5512  
www.energy.ca.gov



**DATE:** April 8, 2015

**TO:** Interested Parties

**FROM:** Mary Dyas, Compliance Project Manager

**SUBJECT: Blythe Energy Project (99-AFC-8C)  
Staff Analysis of Amendment Proposal**

On February 12, 2015, the Blythe Energy, Inc (Blythe Energy) filed a petition with the California Energy Commission (Energy Commission) requesting to modify the Final Decision for the Blythe Energy Project (BEP) to reduce allowable annual NOx, CO, and PM10 emissions. Staff prepared an analysis of this proposed change that can be reviewed on the Energy Commission website for this facility (see below).

The combined-cycle, natural gas-fired, 520-megawatt facility was certified by the Energy Commission in its Decision on March 21, 2001, and began commercial operation in July 2003. The facility is located in the City of Blythe, in Riverside County.

California Energy Commission staff (staff) reviewed the petition and assessed the impacts of this proposal on environmental quality and on public health and safety. In the Staff Analysis, staff proposes revised Air Quality Conditions of Certification **AQ-5** and **AQ-7**. Staff also proposes to delete Condition of Certification **AQ-17** because BEP has already satisfied the offset requirement stated within this condition. It is staff's opinion that, with the implementation of these revised conditions, the facility would remain in compliance with applicable laws, ordinances, regulations, and standards, and the proposed changes to conditions of certification would not result in any significant, adverse, direct, indirect, or cumulative impacts to the environment (20 Cal. Code of Regs., § 1769). Energy Commission staff intends to recommend approval of the petition at the May 13, 2015 Business Meeting of the Energy Commission.

The Energy Commission's webpage for this facility, <http://www.energy.ca.gov/sitingcases/blythe/>, has a link to the petition and the Staff Analysis on the right side of the webpage in the box labeled "Compliance Proceeding." Click on the "Documents for this Proceeding (Docket Log)" option. After the Business Meeting, the Energy Commission's Order regarding this petition will also be available from the same webpage.

This notice has been mailed to the Commission's list of interested parties and property owners adjacent to the facility site. It has also been e-mailed to the facility listserv. The listserv is an automated Energy Commission e-mail system by which information about this facility is e-mailed to parties who have subscribed. To subscribe, go to the Commission's webpage for this facility, cited above, scroll down the right side of the

project webpage to the box labeled "Subscribe," and provide the requested contact information.

Any person may comment on the Staff Analysis. Those who wish to comment on the analysis are asked to submit their comments by 5:00 p.m., May 8, 2015. To use the Energy Commission's electronic commenting feature, go to the Energy Commission's webpage for this facility, cited above, click on the "Submit e-Comment" link, and follow the instructions in the on-line form. Be sure to include the facility name in your comments. Once submitted, the Energy Commission Dockets Unit reviews and approves your comments, and you will receive an e-mail with a link to them.

Written comments may also be mailed or hand-delivered to:

California Energy Commission  
Dockets Unit, MS-4  
Docket No. 99-AFC-8C  
1516 Ninth Street  
Sacramento, CA 95814-5512

All comments and materials filed with and approved by the Dockets Unit will be added to the facility Docket Log and become publically accessible on the Energy Commission's webpage for the facility.

If you have questions about this notice, please contact Mary Dyas, Compliance Project Manager, at (916) 651-8891, or by fax to (916) 654-3882, or via e-mail to [mary.dyas@energy.ca.gov](mailto:mary.dyas@energy.ca.gov).

For information on participating in the Energy Commission's review of the petition, please call the Public Adviser at (800) 822-6228 (toll-free in California) or send your e-mail to [publicadviser@energy.ca.gov](mailto:publicadviser@energy.ca.gov). News media inquiries should be directed to the Energy Commission Media Office at (916) 654-4989, or by e-mail to [mediaoffice@energy.ca.gov](mailto:mediaoffice@energy.ca.gov).

Mail List 747  
BlythePower Listserv

**BLYTHE ENERGY PROJECT (99-AFC-8C)**  
**Petition to Amend the Final Decision**  
**Executive Summary**  
Mary Dyas

## **INTRODUCTION**

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On February 12, 2015, the Blythe Energy, Inc (Blythe Energy) filed a petition with the California Energy Commission (Energy Commission) requesting to modify the Final Decision for the Blythe Energy Project (BEP) to reduce allowable annual NO<sub>x</sub>, CO, and PM<sub>10</sub> emissions from BEP so that the potentials to emit for all criteria pollutants from the facility are below 100 tons per year, consistent with actual facility performance. Staff prepared an analysis of the proposed changes that can be reviewed on the Energy Commission website for this facility (see below).

The purpose of the Energy Commission's review process is to assess any impacts the proposed modifications would have on environmental quality and on public health and safety. The process includes an evaluation of the consistency of the proposed changes with the Energy Commission's Final Decision and an assessment of whether the project, as modified, would remain in compliance with applicable laws, ordinances, regulations, and standards (LORS) (20 Cal. Code Regs., § 1769).

Energy Commission staff (staff) has completed its review of all materials received. The Staff Analysis below is staff's assessment of the project owner's proposal to modify Conditions of Certification **AQ-5** and **AQ-7** to make them consistent with the proposed changes to the Mojave Desert Air Quality Management District permits. Staff also proposes the deletion of Condition of Certification **AQ-17** because BEP has already satisfied the offset requirement stated within this condition. Furthermore, the proposed amendment would not result in any environmental impacts or inconsistency with any LORS.

## **PROJECT LOCATION AND DESCRIPTION**

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The combined-cycle, natural gas-fired, 520-megawatt facility was certified by the Energy Commission in its Decision on March 21, 2001, and began commercial operation in July 2003. The facility is located in the City of Blythe, in Riverside County.

## **DESCRIPTION OF PROPOSED MODIFICATIONS**

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The purpose of this proposed amendment is to reduce allowable annual NO<sub>x</sub>, CO, and PM<sub>10</sub> emissions from BEP so that the potentials to emit for all criteria pollutants from the facility are below 100 tons per year, consistent with actual facility performance. In addition, a new annual average NO<sub>x</sub> emission concentration limit is being proposed for the gas turbines, making the short-term limit more consistent with the new annual limit as well as making the new annual limit more enforceable. With the reductions in annual emissions limits, the site will no longer be considered a major stationary source under

federal Prevention of Significant Deterioration (PSD) regulations. While no changes to the gas turbines will be required to comply with the proposed new long-term limits for CO and PM10, BEP may need to increase ammonia injection slightly under some ambient conditions (the plant would still remain in compliance with the ammonia slip limit specified in Condition of Certification **AQ-5**) and, if necessary, add additional catalyst material to the selective catalytic reduction systems to ensure compliance with the new, lower NOx limits.

The proposed amendment will have no additional impacts beyond those identified in the Commission Decision for the BEP. No increases in emissions or other environmental impacts will result from the proposed changes. Implementation of the amendment would ensure that NOx, CO, and PM10 emissions from the plant are maintained at levels lower than originally licensed and will require the plant to continuously comply with the new lower limits. No change in annual fuel consumption will result from this amendment, and therefore there would be no change in greenhouse gas emissions as a result of the proposed amendment.

## **NECESSITY FOR THE PROPOSED MODIFICATIONS**

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Blythe Energy is requesting this change because the emission limits in the BEP license were based on conservative emission limit guarantees provided by the turbine manufacturer, Siemens—Blythe Energy did not have actual emission test results information during the certification proceeding. It has since been determined that the turbine manufacturer's emissions guarantees were overly conservative. In addition, BEP installed oxidation catalysts on both gas turbines in 2010. Although the addition of the oxidation catalyst was expected to reduce CO emissions from the gas turbines, no emissions limits were changed at that time. Blythe Energy now has sufficient operating experience and source test data to propose the new, lower NOx, CO, and PM10 limits. These proposed new, lower limits are based on actual operating experience and source test results and will limit facility potential to emit below major source thresholds to more accurately reflect the actual emissions from the gas turbines.

## **STAFF'S ASSESSMENT OF THE PROPOSED PROJECT CHANGES**

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The technical area sections contained in this Staff Analysis include staff-recommended changes to existing Air Quality Conditions of Certification in the Blythe Energy Project Decision. Staff has proposed revised Air Quality Conditions of Certification **AQ-5** and **AQ-7** in order to assure compliance with LORS and/or to reduce potential environmental impacts to a less than significant level. Staff also proposes to delete Condition of Certification **AQ-17** because BEP has already satisfied the offset requirement stated within this condition. Staff's conclusions in each technical area are summarized in **Executive Summary Table 1**, below.

**Executive Summary Table 1  
Summary of Impacts for Each Technical Area**

TECHNICAL AREAS REVIEWED	STAFF RESPONSE			Revised Conditions of Certification Recommended
	Technical Area Not Affected	No Significant Environmental Impact*	Process As Amendment	
Air Quality	N/A	N/A	X	X
Biological Resources	X	N/A		
Cultural Resources	X	N/A		
Efficiency	X	N/A		
Facility Design	X	N/A		
Geological & Paleontological Resources	X	N/A		
Hazardous Materials Management	X	N/A		
Land Use	X	N/A		
Noise & Vibration	X	N/A		
Public Health	N/A	N/A	X	N/A
Reliability	X	N/A		
Socioeconomics	X	N/A		
Soil & Water Resources	X	N/A		
Traffic & Transportation	X	N/A		
Transmission Line Safety & Nuisance	X	N/A		
Transmission System Engineering	X	N/A		
Visual Resources	X	N/A		
Waste Management	X	N/A		
Worker Safety & Fire Protection	X	N/A		

\*There is no possibility that the proposed modifications may have a significant effect on the environment, and the modifications will not result in a change in or deletion of a condition adopted by the Commission in the Final Decision, or make changes that would cause project noncompliance with any applicable laws, ordinances, regulations, or standards (20 Cal. Code Regs., § 1769 (a)(2)).

Energy Commission technical staff reviewed the petition for potential environmental effects and consistency with applicable LORS. Staff has determined that the technical or environmental areas of Biological Resources, Cultural Resources, Efficiency, Facility Design, Geological and Paleontological Resources, Hazardous Materials Management, Land Use, Noise and Vibration, Reliability, Socioeconomics, Soil and Water Resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Transmission System Engineering, Visual Resources, Waste Management and Worker Safety and Fire Protection are not affected by the proposed changes, and no revisions or new conditions of certification are needed to ensure the project remains in compliance with all applicable LORS for these areas.

Public Health staff found that the proposed changes would not increase the impacts of the noted criteria pollutants and selected non-criteria pollutants of specific concern in terms of public health cancer or non-cancer risks.

Staff determined, however, that the technical areas of Air Quality would be affected by the proposed project changes and has proposed modifications to Conditions of Certification **AQ-05** and **AQ-07** and the deletion of Condition of Certification **AQ-17** in order to assure compliance with LORS and to reduce potential environmental impacts to a less than significant level. The proposed revised Conditions of Certification **AQ-05** and **AQ-07** are provided in the Air Quality Staff Analysis section of this document.

## **STAFF RECOMMENDATIONS AND CONCLUSIONS**

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Staff concludes that the following required findings, mandated by Title 20, California Code of Regulations, section 1769 (a)(3), can be made, and staff recommends approval of the petition by the Energy Commission:

- The proposed modification(s) would not change the findings in the Energy Commission's Decision pursuant to Title 20, California Code of Regulations, section 1755;
- There would be no new or additional unmitigated, significant environmental impacts associated with the proposed modification(s);
- The facility would remain in compliance with all applicable laws, ordinances, regulations, and standards;
- The modifications proposed in the petition would have no additional impacts beyond those identified in the Commission Decision for the BEP. The proposed changes will ensure that NO<sub>x</sub>, CO, and PM<sub>10</sub> emissions from the plant are maintained at levels lower than originally licensed and will require the plant to continuously comply with the new lower limits. No change in annual fuel consumption will result from this amendment, and therefore there would be no change in greenhouse gas emissions as a result of the proposed amendment;
- The proposed modifications would be beneficial to the project owner and the public because emissions from the BEP project will remain below those evaluated in the original licensing proceeding, and the project will no longer be considered a major stationary source under federal Prevention of Significant Deterioration (PSD) regulations; and
- The proposed modifications are justified because there has been a substantial change in circumstances since the Energy Commission certification. Since BEP commenced commercial operation in 2003, the facility has collected substantial continuous emissions monitoring data (for NO<sub>x</sub> and CO) and source test data (for PM<sub>10</sub>). In addition, oxidation catalysts have been installed on both gas turbines. Further, there have been major advances in PM<sub>10</sub> emissions testing procedures, significantly improving the accuracy of PM<sub>10</sub> testing in reflecting the extremely low PM<sub>10</sub> emission rates from natural gas fired gas turbines.

# **BLYTHE ENERGY PROJECT (99-AFC-08C)**

## **Petition to Amend the Final Decision**

### **Air Quality**

Tao Jiang, Ph.D., P.E.

## **INTRODUCTION**

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On February 12, 2015, Blythe Energy Inc. filed a petition with the California Energy Commission (Energy Commission) requesting to amend the conditions of certification for the Blythe Energy Project (BEP) (BEP 2015). This amendment involves several permit changes to the Energy Commission's Final Decision made on March 26, 2001 (CEC 2001), the Order Approving a Petition to Modify Air Quality Conditions in 2005 (CEC 2005), and the Letter Approving the Addition of a Turndown Upgrade Package to the Two Existing Gas Turbines at Blythe Energy Center (CEC 2015). All changes have been reviewed and approved by the Mojave Desert Air Quality Management District (MDAQMD or District) in a Preliminary Decision/Preliminary Determination for New Source Review Action & Title V Federal Operating Permit (Preliminary Decision) (MDAQMD 2015) issued on March 11, 2015.

## **BACKGROUND**

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BEP was certified by the Energy Commission on March 21, 2001 and began commercial operations in July 2003. The facility is a nominal 520 megawatt (MW) natural gas-fired combined-cycle power plant located in the City of Blythe. The current amendment requests to reduce facility-wide annual mass emissions limits for oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO) and particulate matter (PM<sub>10</sub>) to reflect the current actual lower emissions from the facility. The petition also proposes to add a new annual average NO<sub>x</sub> concentration limit in order to ensure compliance with the new NO<sub>x</sub> annual mass limit. In addition, the permit condition in the original Commission Decision which required surrender of emission reduction credits is also removed as BEP has satisfied the offset requirement. The amendment proposes to modify three Conditions of Certification. However, the amendment does not involve significant modifications to any plant equipment, facility design or operating parameters.

## **LAWS, ORDINANCES, REGULATIONS, AND STANDARDS - COMPLIANCE**

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Since the issuance of the original permit, there have been some new ambient air quality standards (AAQS), such as Federal 1-hour NO<sub>2</sub> standard which became effective in 2010. These new AAQS are more stringent than those in force during the original certification. However, the requested project amendment results in net emission reductions and additional offsets are not required. Furthermore, the facility owners are not requesting return of offsets they originally surrendered in excess of those actually needed based upon recent data. The requested project changes are exempt from the modeling analysis required by District Rule 1302(C)(2)(b) and evaluation for compliance with current AAQS. The proposed changes are consistent with all applicable laws,



ordinances, regulations and standards (LORS) and the proposed changes do not result in any significant adverse air quality impacts.

## **ANALYSIS OF AMENDMENT REQUESTS**

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### **New Annual Average NOx Concentration Limit**

The current best available control technology (BACT) for short-term NOx emissions from the gas turbines is 2.5 parts per million by volume, dry (ppmvd) corrected to 15% oxygen (O<sub>2</sub>) and averaged over one hour. The project owner proposes to add an annual NOx concentration limit of 2 ppmvd @ 15% O<sub>2</sub> averaged over a rolling 12 month period. This lower NOx concentration limit will reduce the overall annual NOx emissions expressed in tons per year. Therefore, the proposed lower annual average NOx concentration limit staff proposes to add to **AQ-5** will help ensure compliance with the new annual NOx mass limit as described below.

### **Facility Wide Annual Emission Limits**

The annual emissions limits in the BEP license were approved based in part on conservative emissions guarantees provided by the gas turbine manufacturer. Based on operating experience and recent source test reports, BEP determined that the annual mass emission rates used to establish emissions limits for NOx, CO and PM10 in the original license were overly conservative, and they now propose to lower these limits.

The annual mass emissions of NOx and CO are calculated from the concentrations in the exhaust, which is directly measured by the Continuous Emissions Monitoring System (CEMS). The minute-by-minute emission concentrations are then averaged every hour and converted to mass emissions by the Data Acquisition and Handling System (DAHS). The annual mass emissions of PM10 are calculated based on the annual fuel use and an emissions factor derived from annual source tests. Both the CEMS data and annual mass emissions are included in the quarterly and annual emission reports to Energy Commission and the District.

**Air Quality Table 1** summarizes the annual emissions from the gas turbines based on annual emission reports for years 2012 to 2014. As shown in **Air Quality Table 1**, the actual annual measured emissions are significantly below the current permit limits, which are shown in **Air Quality Table 2**.

**Air Quality Table 1**  
**2012-2014 Annual Emissions from BEP Gas Turbines (tons/year or tpy)**

Pollutant	2012	2013	2014	Maximum
<b>NOx</b>	60.6	61.8	57.5	61.8
<b>CO</b>	40.2	44.3	28.8	44.3
<b>PM10<sup>a</sup></b>	45.9	46.2	42.2	46.2

Source: BEP 2015 and independent staff assessment.  
 Note: <sup>a</sup> PM10 emissions also include those from the cooling towers.

BEP is proposing to reduce the annual mass emissions limits for NOx, CO and PM10 to 97 tons per year determined on a 12-month rolling average basis. The reductions from the current annual permitted emission limits are summarized in **Air Quality Table 2**.

**Air Quality Table 2**  
**Current and Proposed BEP Annual Emissions (tpy)**

	NOx	CO	PM10 <sup>a</sup>
Current Limit	202	621	103
Proposed Limit	97	97	97
Net Change	(105)	(524)	(6)

Source: BEP 2015 and independent staff assessment.  
 Note: <sup>a</sup> PM<sub>10</sub> emissions also include those from the cooling towers.

Based on the operating data from 2012 to 2014, BEP is expected to meet these proposed new annual limits. The proposed emission reductions will also reduce all criteria pollutant emissions below the federal Prevention of Significant Deterioration (PSD) major stationary source thresholds for this class of source - 100 tpy.

### **Remove the Offset Requirement**

Condition **AQ-17** in the original commission decision required the surrender of Emission Reduction Credits (ERCs) for NOx and PM10 before the start of project construction. Since BEP has satisfied the offset requirement, staff proposes to delete condition **AQ-17** in this amendment.

## **CONCLUSIONS AND RECOMMENDATIONS**

The requested project changes would conform with applicable federal, state, and MDAQMD air quality laws, ordinances, regulations and standards (LORS). In fact, the requested changes will reduce the project impacts below those identified in the original Energy Commission's Final Decision (CEC 2001). Therefore the amended project would

not cause any significant adverse air quality impacts, provided that the following conditions of certification are included. Staff recommends that the revised conditions of certification be approved as shown below.

## **AMENDED AND DELETED CONDITIONS OF CERTIFICATION**

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Below is a list of those conditions of certification that must be revised from those approved in the 2001 Energy Commission Final Decision (CEC 2001) and the 2005 Order Approving a Petition to Modify Air Quality Conditions (CEC 2005). These changes are also consistent with March 11, 2015 MDAQMD Preliminary Decision. ~~Strikethrough~~ is used to indicate deleted language and **underline and bold** is used for new language.

- AQ-5** Emissions from the turbines (including its associated duct burner) shall not exceed the following emission limits at any firing rate, except for CO, NO<sub>x</sub> and VOC during periods of startup, shutdown and malfunction:
- a. Hourly rates, computed every 15 minutes, verified by CEMS and annual compliance tests:
    - i. NO<sub>x</sub> as NO<sub>2</sub> — **the most stringent of** 19.80 lb/hr ~~(based on or~~ 2.5 ppmvd corrected to 15% O<sub>2</sub> and averaged over one hour).
    - ii. **NO<sub>x</sub> as NO<sub>2</sub> — 2.0 ppmvd corrected to 15% O<sub>2</sub> and averaged over a rolling 12 month period.**
    - iii. ~~iii.~~ **CO — the most stringent of** 17.5 lb/hr ~~(based on or~~ 4.0 ppmvd) corrected to 15% O<sub>2</sub> and averaged over 3 hours).
    - iii-iv. Ammonia Slip — 10 ppmvd (corrected to 15% O<sub>2</sub> and averaged over three hours).
  - b. Hourly rates, verified by annual compliance tests or other compliance methods in the case of SO<sub>x</sub>:
    - i. VOC as CH<sub>4</sub> — 2.9 lb/hr (based on 1 ppmvd corrected to 15% O<sub>2</sub>).
    - ii. SO<sub>x</sub> as SO<sub>2</sub> — 2.7 lb/hr (based on 0.5 grains/100 dscf fuel sulfur).
    - iii. PM<sub>10</sub> — 11.5 lb/hr.

**Verification:** The project owner shall submit the following in each Quarterly Operations Report: All continuous emissions data reduced and reported in accordance with the District approved CEMS protocol; a list of maximum hourly, maximum daily, total quarterly, ~~and total calendar year,~~ **and rolling 12-month** emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, VOC and SO<sub>x</sub> (including calculation protocol); a log of all excess emissions, including the information regarding malfunctions/breakdowns required by District Rule 430; operating parameters of emission control equipment, including but not limited to ammonia injection rate, NO<sub>x</sub> emission rate and ammonia slip; any maintenance to any air pollutant control system (recorded on an as-performed basis); and any permanent

changes made in the plant process or production that could affect air pollutant emissions, and when the changes were made.

**AQ-7** Emissions from ~~this facility~~ **all Blythe Energy Project I permits**, including the cooling towers, shall not exceed the following emission limits, based on a rolling 12 month summary:

- a. NO<sub>x</sub> — ~~202~~**97** tons/year, verified by CEMS.
- b. CO — ~~621~~**97** tons/year, verified by CEMS.
- c. VOC as CH<sub>4</sub> — 24 tons/year, verified by compliance tests and hours of operation in mode.
- d. SO<sub>x</sub> as SO<sub>2</sub> — 24 tons/year, verified by fuel sulfur content and fuel use data.
- e. PM<sub>10</sub> — ~~403~~**97** tons/year, verified by compliance tests and hours of operation.

**Verification:** The project owner shall submit the following in each Quarterly Operations Report: All continuous emissions data reduced and reported in accordance with the District approved CEMS protocol; a list of maximum hourly, maximum daily, total quarterly, and total calendar year, **and rolling 12-month** emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, VOC and SO<sub>x</sub> (including calculation protocol); a log of all excess emissions, including the information regarding malfunctions/breakdowns required by District Rule 430; operating parameters of emission control equipment, including but not limited to ammonia injection rate, NO<sub>x</sub> emission rate and ammonia slip; any maintenance to any air pollutant control system (recorded on an as-performed basis); and any permanent changes made in the plant process or production that could affect air pollutant emissions, and when the changes were made.

**AQ-17 Deleted.**

~~The project owner must surrender to the District sufficient valid Emission Reduction Credits for the turbines before the start of construction of any part of the project for which this equipment is intended to be used. In accordance with Regulation XIII the operator shall obtain 202 tons of NO<sub>x</sub> and 103 tons of PM<sub>10</sub> offsets (VOC ERCs from SCAQMD may be substituted for NO<sub>x</sub> ERCs at a rate of 1.6:1).~~

**Verification:** ~~The project owner must submit all ERC documentation to the District and the CPM prior to the start of construction.~~

## References

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BEP 2015 Blythe Energy Inc. *Petition of Amend Blythe Energy Project (99-AFC-08C)*, February 12, 2015.

CEC 2000 - California Energy Commission. *Final Staff Assessment/Environmental Assessment Filed Jointly (99-AFC-08)*. November 14, 2000.

CEC 2001 - California Energy Commission. *Commission Decision of Blythe Energy Project (99-AFC-08)*. March 26, 2001.

CEC 2005 - California Energy Commission, *Order Approving a Petition to Modify Air Quality Conditions (99-AFC-08C)*. June 24, 2005.

CEC 2015 – California Energy Commission. *Letter Approving Requested Modification to Add a Turndown Upgrade Package to the Two Existing Gas Turbines at Blythe Energy Center (99-AFC-8C)*. January 7, 2015.

MDAQMD 2015 - Mojave Desert Air Quality Management District. *Preliminary Decision/Preliminary Determination for New Source Review Action & Title V Federal Operating Permit*. March 11, 2015.