

## DOCKETED

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<b>Project Title:</b>	Alamitos Energy Center
<b>TN #:</b>	214637
<b>Document Title:</b>	AES's Comments on the SCAQMD Final Determination of Compliance
<b>Description:</b>	N/A
<b>Filer:</b>	Elyse Engel
<b>Organization:</b>	CH2M
<b>Submitter Role:</b>	Applicant Consultant
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AES Alamos Energy, LLC  
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Long Beach, CA 90803  
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December 5, 2016

Ms. Vicky Lee  
Air Quality Engineer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

**Subject: AES Alamos, LLC (Facility ID 115394)  
Draft Facility Permit to Operate and Final Determination of Compliance Comments**

Dear Ms. Lee:

AES Alamos Energy, LLC (AES) appreciates the efforts by the South Coast Air Quality Management District (SCAQMD) in preparing the Alamos Energy Center's (AEC) Final Determination of Compliance (FDOC). AES agrees with the conclusions derived by the SCAQMD and provides the following minor comments on the draft Facility Permit to Operate and FDOC for your consideration.

**Draft Facility Permit to Operate Comments:**

Pages 1 through 18, Section H, Table of Equipment – Please verify that the conditions referenced in Section H are consistent with the permit conditions presented in the FDOC. For example, Conditions E193.6 and E193.7 are still listed in the last column of this table for CCGT-1, CCGT-2, SCGT-1, SCGT-2, SCGT-3, and SCGT-4, despite having been deleted in the FDOC.

Page 60, Condition E73.2 – The wording for Condition E73.2 does not match that provided in the FDOC, and should be revised as follows for consistency:

E73.2 Notwithstanding the requirements of Section E conditions, the operator may ~~use~~ commence the construction of Phase II of this project if all of the following condition requirement(s) are met:

The BACT/LAER determination for the Phase II of this project shall be reviewed and modified (by SCAQMD) as appropriate at the latest reasonable time which occurs no later than 18 months prior to the commencement of construction of Phase II of the project.

**[40 CFR 52.21 – PSD, 6-19-1978]**

[Devices subject to this condition: D163, D164, D165, C170, D173, C178, D181, C183, D185, C188, D191, C194, D197, C200, D203, C206, D209, D210]

Page 61, Condition E193.6 – Condition E193.6 was deleted in the FDOC, and should similarly be deleted from the Facility Permit.

Page 62, Condition E193.7 – Condition E193.7 was deleted in the FDOC, and should similarly be deleted from the Facility Permit.

**Final Determination of Compliance Comments:**

Page 83, 2<sup>nd</sup> Paragraph – Attached to this letter is a performance guarantee for the combined-cycle gas turbines' ability to meet the Best Available Control Technology (BACT) limit of 1.5 parts per million by volume, dry basis (ppmvd) carbon monoxide (CO) at 15 percent oxygen (O<sub>2</sub>).

Page 164, 1<sup>st</sup> Full Paragraph – It is stated that a CO BACT analysis is required per SCAQMD Rule 1701(b)(1) and 1703(a)(2). SCAQMD Rule 1701(b)(1) requires a BACT analysis when there is “a net emission increase of a criteria air contaminant,” which does not seem applicable to the AEC's CO emissions as they result in a net decrease. Please resolve this discrepancy.

Page 325, Last Paragraph Before Question 4 – This paragraph should be revised as follows:

Upon SCAQMD's request, AES is in the process of securing a written performance guarantee from the equipment vendor to ensure the proposed ~~simple~~**combined**-cycle turbines with oxidation catalyst will comply with the new BACT standard of 1.5 ppmvd CO at 15% O<sub>2</sub> without duct burner.

Should you have any questions regarding the comments provided, please do not hesitate to call me at 562-493-7840. We appreciate your attention to these comments.

Sincerely,



Stephen O'Kane  
Manager  
AES Alamos Energy, LLC

Attachment

cc: Jeffrey Harris/ESH  
Jerry Salamy/CH2M  
Keith Winstead/CEC

# CCGT CO Performance Guarantee



11/11/2016

To: Michael Esham, Project Engineer, Vogt Power Intl.  
From: Joshua D. Gillespie, EmeraChem LLC

Subj: CO/VOC OXIDATION CATALYST AES ALAMITOS ENERGY CENTER

**Catalyst selection based on:**

CO Catalyst Performance Warranty- 26280 hr / 3 yr  
Scope: Catalyst modules and design for internal frame and gas seals  
By Others: Duct/catalyst housing (including any transitions)

**CO SYSTEM DESIGN BASIS:**

Gas Flow from:	GE 7FA.05
Dimensions:	Inside liner dimensions of 25'-9" W x 76' H
Gas Flow (design case):	4,389,000 lb/hr
Fuel	Natural Gas
Gas Flow Rate (at catalyst face)/ (design case):	Designed for gas velocities within +/- 15% of the mean velocity at the catalyst face
Temperature (at catalyst face):	Designed for gas temperatures within range +/- 25% F of given average temperature at all points at the catalyst face
CO Concentration (at catalyst face):	Given-See Table A-Performance Data
CO Reduction (design case):	To Max. 1.5 ppmvdc @15% O2
VOC Concentration (at catalyst face):	Given-See Table A-Performance Data
VOC composition	Assumed-50% Saturated

Joshua D. Gillespie  
Sales and Proposals Manager  
EmeraChem LLC



Vogt Power International Inc.  
13551 Triton Park Boulevard Suite 2000  
Louisville, KY 40223  
Attn: Michael Esham, Project Engineer

Subject: AES Alamos Energy Center CO Catalyst Data Sheet

Dear Mr. Esham,

Synergy Catalyst is providing this Carbon Monoxide (CO) design basis and emissions reduction and sensitivity analysis table for the CO Catalyst system for the removal of CO from the flue gas from a natural gas fired General Electric Frame 7FA.05 combustion turbine heat recovery steam generator for the AES Alamos Energy Center.

The CO Catalyst system consists of the following scope of supply to fit within the VPI provide HRSG duct:

- Catalyst Support Structure Engineering Design
- Catalyst Support Structure with Catalyst mounting system
- Discreet-cell diesel foil brazed metallic catalyst substrate with Platinum Baseload formulation oxidation coating.

The Catalyst support structure will be designed to the project specific structural requirements. It will utilize rectangular tube steel shapes for the vertical support columns and horizontal cross beams as the primary structural components with tube steel shapes for inter-module structural bulwark and catalyst mounting to yield a strong and lightweight catalyst support structure. Baffle Seal plates will seal the support structure to the internal HRSG liner to eliminate exhaust gas bypass. The catalyst elements will be individually mounted and sealed with flat face tetraglas gaskets.

The brazed metallic oxidation catalysts are manufactured with a contaminant-free (oil-less and waterless) manufacturing process with vacuum brazing which yields the strongest and longest lasting oxidation catalysts. As the entire catalyst substrate becomes an integral brazed substrate, oxidation coating loss is minimized for application for thermal cycling applications. Precision zone coating precisely applies pristine and pure platinum materials to achieve highly efficient CO reduction rates. The CO Catalyst performance warranty period is 26,280 hours or 3 years. The CO System design basis is summarized as follows:

CO SYSTEM DESIGN BASIS:

Gas Flow from:	Natural Gas Fired combustion turbine GE 7FA.05
Dimensions:	Inside liner dimensions of 25'-9" W x 76' H
Gas Flow:	Given - See Table A - Performance Data
Fuel:	Natural Gas
Gas Flow Rate (At catalyst face):	Designed for gas velocities within +15% of the mean velocity at the catalyst face
Temperature (At catalyst face):	Designed for gas temperatures within range +25°F of given average temperatures at all points at the catalyst face
CO Concentration (At catalyst face):	Given - See Table A - Performance Data
CO Reduction:	To Max. 1.5 ppmvd @ 15% O <sub>2</sub>
VOC Concentration (At catalyst face):	Given - See Table A - Performance Data
VOC Composition:	Assumed – 50% Saturated

Very Respectfully,

James Whitehorn  
Director, Power Generation Sales



November 11, 2016

Michael Esham  
 Vogt Power International

Re: CO Catalyst Information AES Alamos Energy Center

Dear Michael:

Our CO Catalyst Selection was based on:

- CO Catalyst Performance Warranty – 26280 hr / 3 yr
- Scope: Catalyst modules and design for internal frame and gas seals
- By Others: Duct/catalyst housing (including any transitions)

The following table summarizes the flue gas conditions, CO catalyst performance guarantees and the CO catalyst sizing.

Inlet Conditions	
Fuel	Natural Gas
Design Exhaust Flow Rate	2,702,000 – 4,389,000 lb/hr
Design Exhaust Temperature	636 - 737 °F
Inlet CO concentration	9 ppmvd (15% O <sub>2</sub> )
Inlet VOC concentration	1.4 ppmvd (15% O <sub>2</sub> )
Temperature Distribution Required	+/- 25°F deviation from mean
Velocity Distribution Required	+/- 15% deviation from mean
Catalyst Performance	
CO Emissions	≤ 1.5 ppmvd (15% O <sub>2</sub> )
CO Catalyst information	
Approximate Catalyst Frame Dimensions	25.75' w x 76' h

Sincerely,

David Repp  
 Sales Manager – Power Plant Catalyst  
 TEL : 678-341-7525 FAX : 678-341-7509  
 david.repp@jmus.com





































