

## DOCKETED

<b>Docket Number:</b>	16-AFC-01
<b>Project Title:</b>	Stanton Energy Reliability Center
<b>TN #:</b>	216223
<b>Document Title:</b>	Permit Applications for the Stanton Electric Reliability Center
<b>Description:</b>	N/A
<b>Filer:</b>	Patty Paul
<b>Organization:</b>	South Coast Air Quality Management District
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	2/24/2017 11:38:11 AM
<b>Docketed Date:</b>	2/24/2017



# South Coast Air Quality Management District



21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

February 24, 2017

Kara Miles  
President  
Stanton Energy Reliability Center, LLC  
650 Bercut Drive, Suite A  
Sacramento, CA 95811

Subject: Permit Applications for the Stanton Electric Reliability Center (16-AFC-01),  
located at 10711 Dale Avenue, Stanton, CA 90680 (Facility ID# 183501)

Dear Ms. Miles:

The South Coast Air Quality Management District (SCAQMD) received permit applications for the proposed Stanton Energy Reliability Center (SERC) on November 2, 2016. Based on our review of the initial application package it was determined that additional information was required in order to deem the applications complete. The SCAQMD issued letters dated December 2, 2016 and February 2, 2017 requesting additional information. With the last submittal of additional information received on February 15, 2017, the SCAQMD has determined that the application package is now substantially complete. The reference application numbers for this project and our review determination are provided in the table below:

Application	Equipment Description	Completeness Determination
589974	Initial Title V	Deemed Complete
589935	Simple Cycle Turbine	Deemed Complete
589936	Simple Cycle Turbine	Deemed Complete
589937/589939*	SCR/CO Catalyst	Deemed Complete
589938/589940*	SCR/CO Catalyst	Deemed Complete
589941	Ammonia Tank, Aqueous	Deemed Complete

\*SCR/CO Catalyst should be one application.

Notwithstanding the “deemed complete” determination, additional information is still needed for the District to evaluate the project’s compliance with all air quality Rules & Regulations. District’s comments are provided below in the same sequence as the comments presented in our letters dated December 2, 2016 and February 2, 2017.

10. Commissioning

- c. As discussed in our meeting on February 8, 2017, the “Stanton 2x0 Commissioning Emissions” table provided as an attachment to your response letter dated December 29, 2016, is based not on General Electric data but on CEMS data from your San Diego plant. As part of the February 15, 2017 submittal, this table has been revised to provide proposed emission factors for the commissioning period prior to installation of catalysts and emissions factors for the commissioning period after installation of catalysts. The revised table is entitled “Table 2 Commissioning Emissions (per turbine).” Following are our comments on the revised “Table 2”:

- i. Please add SO<sub>x</sub> emissions to “Table 2 Commissioning Emissions (per turbine).”
  - ii. As explained in our question 10.b., the SCAQMD does not allow the use of NO<sub>x</sub> and CO CEMS data for mass emissions reporting until all certification testing has been successfully completed for Acid Rain certification and Rule 218 certification, respectively. Therefore, unlike the San Diego APCD, the SCAQMD will not be able to rely on CEMS data to measure the NO<sub>x</sub> and CO emissions during commissioning. The applicant will be required to provide documentation to validate the duration for each activity, the fuel usage for each activity, and the emission rate for each pollutant for each activity provided in “Table 2 Commissioning Emissions (per turbine),” including but not limited to the following documentation.
    - aa. Please provide a description of the San Diego facility and explain whether it is exactly the same as the proposed SERC.
    - bb. As discussed in our meeting on February 8, 2017, please provide NO<sub>x</sub> and CO CEMS data and other documentation from your San Diego facility to validate the duration for each activity, the fuel usage for each activity, and the emission rate for NO<sub>x</sub> and CO for each activity.
    - cc. The Notes on “Table 2” state that the “Total Estimated Fuel Use Prior to Catalyst Installation, MMBtu ((HHV) (per Turbine)” is based on “Assumes minimum load for Steps 1-3, 50% load for Step 4, and 100% load for Step 5.” The “Total Estimated Fuel Use After Catalyst Installation, MMBtu (HHV) (per Turbine)” is based on “Assumes 100% load for Step 6.” Please discuss how the CEMS data and other documentation from the San Diego plant support these assumptions.
    - dd. Please provide emissions calculation to support the VOC, PM<sub>10</sub>, and SO<sub>x</sub> emission rates for each activity provided in “Table 2.”
    - ee. Please provide documentation of subsequent certification testing and approval by the San Diego APCD to allow the retroactive use of the CEMS data and other documentation acquired during commissioning.
13. SCR and CO Oxidation Catalyst Specifications and Guarantees
  - a. SCR
    - i. This question requested overall dimensions. The response is: “The eight modules are installed in a 2 wide by 4 high grid within a duct having a cross section that is approximately 23.4 feet wide by 25.0 feet high.” If the overall cross section is 23.4 ft W. x 25.0 ft H, what is the depth of the catalyst modules?
14. Fees
  - b. The response to question 14.a. indicates the on-line fee printout is provided in Attachment 3, but the submittal does not include Attachment 3 or the print-out.
15. Rule 212--Standards for Approving Permits
  - b. Question 15.a. states that the Form 400-A indicates there are no schools (K-12) within 1000 feet of the facility property line and requests confirmation there are no such

schools. The response to 15.a. indicates two schools, R.M. Pyle Elementary and Stepping Stones Learning Center, have been identified to be near the SERC project site.

i. Stepping Stones Learning Center

aa. Please provide the address.

bb. Rule 212 does not define “school.” Health and Safety Code § 42301.9, however, defines “school” to mean “any public or private school used for purposes of the education of more than 12 children in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in private homes.”

Please confirm Stepping Stones Learning Center is a “school” within the meaning of H & S Code § 42301.9.

ii. The response indicates these two schools are added to the risk summary Table 5.9-8 and Attachment 3. Table 5.9-8 is on pages 3-4 of the response letter, but no Attachment 3 was included – please provide Attachment 3. (The response to question 14.a. also indicates the on-line fee printout is provided in Attachment 3, but the printout is not included in your submittal.)

c. The response to 15.a. indicates School 1 - R.M. Pyle Elementary is 1050 ft from the site, as measured from the northern site boundary to the school southern boundary. Since the distance is very close to the threshold of 1000 ft, please provide the following additional information:

i. Please provide a map showing the nearest equipment for the SERC, the outer boundary of R.M. Pyle Elementary and the distance between the two.

16. Startup and Shutdown Permit Conditions

a. In your response letters dated December 29, 2016 and February 15, 2017, revised values for startup and shutdown emissions, as requested, were provided for the criteria pollutants. The duration of the startup and shutdown periods remain the same as in the original application. For the February 15, 2017 submittal, the “Stanton 2x0 Startup & Shutdown Emissions Summary,” footnote 1 states: “Proposed limits are based on the W Power short-term emissions values plus the difference in duration between the W Power duration and the proposed duration times the baseload emission rates.”

Other facilities typically propose startup and shutdown emissions, and startup and shutdown durations provided by General Electric. Please explain why the proposed limits for startup and shutdown emissions, and startup and shutdown durations are calculated pursuant to footnote 1.

b. Permit conditions will limit the duration of the startup and shutdown periods, and the NOx and CO emissions emitted per startup and per shutdown.

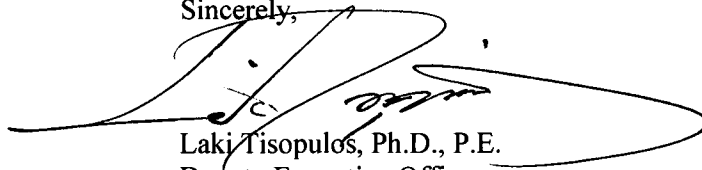
i. Do you have CEMS data that confirm the proposed startup emissions for NOx and CO and the associated startup duration period will be sufficient for each and every startup? Please elaborate.

- ii. Do you have CEMS data that confirm the proposed shutdown emissions for NOx and CO and the associated shutdown duration period will be sufficient for each and every shutdown? Please elaborate.

Please be aware that clarification of and more detailed information may be needed during the course of our full engineering review and evaluation. Your continued cooperation will be essential in the timely review of the applications.

If you have any questions regarding your permit applications please call the undersigned at (909) 396-3123 or contact Mr. Andrew Lee, Senior AQ Engineering Manager, at (909) 396-2643 or [aalee@aqmd.gov](mailto:aalee@aqmd.gov).

Sincerely,



Laki Tisopoulos, Ph.D., P.E.  
Deputy Executive Officer  
Engineering and Permitting

LT:AYL:BC:VL

cc: Andrew Lee, SCAQMD  
John Heiser, CEC ([John.Heiser@energy.ca.gov](mailto:John.Heiser@energy.ca.gov))  
Gregory Darwin, Atmospheric Dynamics, Inc. ([darwin@atmosphericdynamics.com](mailto:darwin@atmosphericdynamics.com))  
Paul Cummins, Wellhead Electric Co. ([pcummins@wellhead.com](mailto:pcummins@wellhead.com))