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Auxiliary Boiler Commissioning Changes

Petition for Post-Certification Amendment

for the

Huntington Beach Energy Project

Huntington Beach, California
(12-AFC-02C)

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Submitted to the:

California Energy Commission

Submitted by:

AES Huntington Beach Energy, LLC

With Technical Assistance by:

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and

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Executive Summary

AES Huntington Beach Energy, LLC (the Project Owner) is submitting this petition to the California Energy Commission (CEC) for post-Certification license modification for the Huntington Beach Energy Project (HBEP) (12-AFC-02C). The HBEP consists of a combined cycle gas turbine (CCGT) power block and a simple cycle gas turbine (SCGT) power block. The CCGT power block includes unfired heat recovery steam generators (HRSG), a condensing steam turbine (STG), an air-cooled condenser, and ancillary facilities. To facilitate startup of the CCGT, the project includes an auxiliary boiler to maintain steam turbine seals and other critical components analyzed in the Certification process. The South Coast Air Quality Management District (SCAQMD) Final Determination of Compliance (FDOC) for the HBEP omitted conditions relating to the commissioning of the auxiliary boiler.

The Project Owner has submitted an application to the SCAQMD to amend the Title V permit to incorporate conditions relating to commissioning of the auxiliary boiler. The purpose of this petition for post-Certification license amendment (Petition to Amend or PTA) is to conform the CEC license with the Title V permit conditions for the auxiliary boiler. Specifically, this PTA proposes the following changes to conform the CEC license with the facility's Title V permit:

- Clarify that Conditions of Certification AQ-19 and AQ-20 exempt commissioning activities from the condition limits for oxides of nitrogen (NO_x) and carbon monoxide (CO), similar to the treatment of start-up emissions. Maximum allowable emission limits for the facility will not change.
- Modify Condition of Certification AQ-9 to: (1) include an omitted CO emission factor for the auxiliary boiler for the time period between initial startup and when the Continuous Emissions Monitoring System has been certified by the SCAQMD and (2) correct the maximum allowable monthly volatile organic compound (VOC) emissions.
- Clarify that the number of auxiliary boiler fired commissioning hours is limited to no more than 100 (new condition from the SCAQMD).

The specific COC language proposed is set forth in Subsection 3.1.5. As described in Section 3, there will be no significant environmental impacts associated with the proposed modifications, the project will continue to comply with all applicable laws, ordinances, regulations, and standards (LORS).

The Project Owner requests that CEC Staff approve this PTA in accordance with Section 1769(a)(3)(B), because (i) the criteria of Section 1769(a)(3)(A)(i) and (ii) are met and no daily, quarterly, annual, or other emission limit will be increased as a result of the proposed modifications. As described above, commissioning of the HBEP's CCGT power block is dependent upon the commissioning of the auxiliary boiler. Given the urgency and need for the HBEP to complete commissioning and achieve commercial operations on time to ensure grid reliability, the Project Owner requests that CEC Staff approve this PTA expeditiously so as not to delay commissioning of the HBEP.

1. Introduction

1.1 Background

The CEC approved the HBEP AFC on October 29, 2014 (“Final Decision”) and the amendment request to the original license on April 12, 2017 (“Final Amendment Decision”). The HBEP site is on the existing Huntington Beach Generating Station property, in the City of Huntington Beach, CA. The CEC analyzed the project’s impacts for two General Electric Model 7FA.05 combustion turbines in a combined cycle configuration, four General Electric Model LMS100-PB combustion turbines simple cycle configuration, and an auxiliary boiler. The project is currently under construction, with CCGT commissioning expected to commence in October of 2019. Auxiliary boiler commissioning is scheduled to begin July 15, 2019.

1.2 Overview of Proposed Amendments

The proposed modifications are necessary to achieve consistency between the Title V permit and CEC license for the HBEP. This PTA contains all of the information that is required pursuant to the CEC’s Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes). The information necessary to fulfill the requirements of Section 1769 is contained in Sections 1 through 6.

1.3 Necessity of Proposed Changes, an Explanation of Why it Should Be Permitted, and a Description of New Information or Change in Circumstances

As described on page 4.2-4 of the Final Amendment Decision for the HBEP, the Project Owner anticipated that the duration of commissioning for the auxiliary boiler would be approximately 30 hours. In the course of preparations for the commissioning of the auxiliary boiler, the Project Owner has determined that additional commissioning hours are required. In addition, the FDOC for the HBEP omitted certain condition language relating to commissioning of the auxiliary boiler. The Project Owner has applied to the SCAQMD for revisions to the Title V permit to address commissioning of the auxiliary boiler. Therefore, the Project Owner is proposing modifications to the CEC license to ensure conformity with the changes proposed to the facility’s Title V permit to accommodate commissioning of the auxiliary boiler.

1.4 Summary of Potential Environmental Effects and Proposed Mitigation Measures

Section 3 of this PTA includes a discussion of the potential environmental impacts associated with the modifications as well as a discussion of the consistency of the modification with LORS. Section 3 concludes that there will be no significant environmental impacts associated with implementing the actions specified in this PTA, there will be no changes to permitted emissions levels for the facility, and that the project, as modified, will comply with all applicable LORS.

1.5 Consistency of Changes with Applicable LORS

The proposed project modifications are consistent with all applicable LORS, and will not affect the project’s ability to comply with all applicable LORS.

2. Description of Proposed Modifications

The HBEP is currently in construction and is scheduled to begin CCGT commissioning in October 2019. Auxiliary boiler commissioning is scheduled to begin July 15, 2019. During the planning for the auxiliary boiler commissioning activities, the Project Owner determined that the current Title V permit omitted conditions relating to auxiliary boiler commissioning. As a result, the Project Owner commenced preparation of an air permit modification request, and is submitting this PTA to ensure that the CEC license conforms to the provisions of the Title V permit.

Specifically, this PTA proposes the following changes to the project’s Air Quality COCs:

- Clarify that Conditions of Certification AQ-19 and AQ-20 exempt commissioning activities from the condition limits for oxides of nitrogen (NOx) and carbon monoxide (CO), similar to the treatment of start-up emissions. Maximum allowable emission limits for the facility will not change.
- Modify Condition of Certification AQ-9 to: (1) include an omitted CO emission factor for the auxiliary boiler for the time period between initial startup and when the Continuous Emissions Monitoring System has been certified by the SCAQMD and (2) correct the maximum allowable monthly volatile organic compound (VOC) emissions.
- Clarify that the number of auxiliary boiler fired commissioning hours is limited to no more than 100 (new condition from the SCAQMD).

No physical changes to the project design are proposed, no earth-moving activities are required, and no change to the construction, commissioning and operations as described in the original Application for Certification, as subsequently amended, are necessary to implement the proposed changes. The following subsection describes the proposed changes.

2.1 Auxiliary Boiler NOx and CO Emission Limits

During licensing, the Project Owner estimated that commissioning of the auxiliary boiler would take approximately five days and require up to six fired hours per day. The Project Owner provided an estimate of the proposed auxiliary boiler commissioning emissions for the preparation of the project’s air permit, which demonstrated that there would be no significant impacts from commissioning of the auxiliary boiler. These emission limits were based on the cold start emissions for the auxiliary boiler, when the emission controls systems (selective catalytic reduction, ultra-low NOx burners, and flue gas recirculation) were either not operational or operating at less than design specifications. However, language clarifying that the SCAQMD’s best available control technology emission limits for NOx and CO would not be applicable during commissioning of the auxiliary boiler was omitted from Conditions AQ-19 and AQ-20 (by way of comparison, see Alamitos Energy Center Final Decision, Conditions AQ-A11 and AQ-A14). Therefore, the Project Owner is proposing modification of Condition AQ-19 and AQ-20 to exempt the auxiliary boiler from meeting the NOx and CO emission limits during start up and commissioning.

2.2 Correct the Auxiliary Boiler VOC Monthly Emissions and Allow CO Monitoring

The Project Owner is requesting a correction to the maximum monthly VOC emission and the use of the Continuous Emissions Monitoring System installed on the auxiliary boiler to measure and report CO emissions for the project. As written, Condition AQ-9 includes an error in the maximum monthly VOC emissions which requires correction. Furthermore, Condition AQ-9 requires the Project Owner to submit emission reports based on the emission factors contained in Condition AQ-9, which includes a CO emission factor. As such, the Project Owner is requesting the condition be modified by the CEC and SCAQMD to allow the direct measurement and reporting of CO emissions.

2.3 Auxiliary Boiler Commissioning Hours Limit

The Project Owner is requesting change to auxiliary boiler commissioning duration from “5 days” to 100 hours of fired commissioning. This provides a sufficient flexibility to allow for the orderly commissioning of the auxiliary boiler without exceeding the monthly emissions contained in Condition AQ-9.

3. Environmental Analysis of Proposed Amendments

The Project Owner has requested amendment of the Title V permit for the facility to include omitted conditions for commissioning of the auxiliary boiler, and is submitting this PTA to conform the CEC’s license with the requested changes. The only technical section that is affected by the proposed modification is Air Quality, which is discussed in further detail below. The proposed modification will not

result in potential environmental impacts in any other technical discipline as the proposed modifications will not result in new ground disturbance; physical changes to the site or setting; create new sources of noise; change applicable daily, quarterly, annual, or other emission limits; result in any changes to the traffic and transportation analysis; affect water use by the facility; create new or different sources of hazardous materials or waste; or affect the visual setting or character of either the site or project analyzed in the Final Amendment Decision. Further, the proposed modification will not affect the project's ability to comply with applicable LORS.

The proposed changes to the HBEP Conditions of Certification project will not result in an increase in air emissions above those analyzed in the Commission Decision. Both the Commission and SCAQMD considered the commissioning of the auxiliary boiler in their respective analyses. For instance, the Commission Decision discusses HBEP commissioning at the bottom of page 4.2-4, including the 5 days required for the auxiliary boiler commissioning. Furthermore, the SCAQMD's Final Determination of Compliance addressed auxiliary boiler commissioning by stating the following.

"It will be assumed that the CCTGs and auxiliary boiler will operate their full allotment of allowable annual operating hours after commissioning."¹

Therefore, including provisions to allow the auxiliary boiler to exceed the NOx and CO emission limits of Conditions AQ-19 and 20 during commissioning is consistent with both the SCAQMD's FDOC and the Commission Decision.

The proposed change to the VOC emissions in Condition AQ-9 reflects the correction of an oversight in the Final Determination of Compliance. Information provided in the revised AES Huntington Beach permit application dated March 14, 2016 and the Final Determination of Compliance (FDOC) issued November 18, 2016. Table D.3 of the FDOC provides the hourly emission rates of the auxiliary boiler and emissions per start up event. Cold start, warm start and hot start VOC emission rates are listed as 1.05 lbs/event, 0.52 lbs/event and 0.15 lbs/event respectively and were calculated assuming a normal operation "uncontrolled" emission rate. These startup VOC emission rates are incorrect. Table 11 of Appendix A in the AES Huntington Beach permit application dated March 14, 2016 provided hot start, warm start and cold start VOC emission rates of 4.69 lbs/event, 2.34 lbs/event and 0.69 lbs/event respectively. Total maximum monthly emissions for the auxiliary boiler assume two cold starts per month, four warm starts per month and four hot starts per month. Therefore, the maximum monthly VOC emissions listed in condition A63.10 are incorrect. Revised maximum monthly emissions are provided below.

30 Day Emission Scenario 1/Start Ups and Shutdowns

Event	# per Month	Duration Hours/Event	VOC Emission	
			Rate lb/Event or lb/hr	Emissions Lb/Month
Cold Start	2	NA	4.69	9.38
Warm Start	4	NA	2.34	9.36
Hot Start	4	NA	0.69	2.76
Normal (1)	NA	222.4	0.37	82.29
Total		222.4		103.79

(1) Assumes operation at 71 MMBtu/hr with more hours for lower load rate operation.

The proposed change to the method of demonstrating compliance with the auxiliary boiler's CO emissions reflects the Project Owner's decision to install a more accurate and precise method of estimating CO emissions, the use of a CEMS. This change will not result in any increase in emissions and will provide the SCAQMD with a more precise estimate of auxiliary boiler CO emissions.

The last proposed change better defines the auxiliary boiler's commissioning period from 5 days to a specific number of fired operating hours.

¹ Huntington Beach Energy Project (HBEP) Final Determination of Compliance (FDOC) Package (TN 214533), page 141.

These proposed changes do not result in an unmitigated emission increase in air emissions as the monthly VOC emissions limit change requested in Condition AQ-9 is covered by the VOC ERCs provided for the auxiliary boiler during permitting due to the SCAQMD’s requirement to round ERC amounts to whole numbers (i.e., an ERC liability of 1.1 pounds per day requires 2 pounds per day of ERCs).

3.1.1 Environmental Impacts

3.1.2 Regulatory Requirements

3.1.2.1 Federal Regulations

The federal pre-construction Prevention of Significant Deterioration (PSD) program for sources subject to PSD pre-construction review permitting applies to sources located in attainment areas, which are classified as major sources. The HBEP is subject to the PSD program. Therefore, PSD review applies to the proposed modification, which will be addressed below in the Local Regulations discussion.

The federal operating permit program (Title V) and prohibitory rules applicable will be addressed in the Section 3.1.3.2, Local Regulations.

3.1.2.2 Local Regulations

The SCAQMD has promulgated rules governing the need for sources to apply for pre-construction/operating permits, and prohibitory rules. An analysis of the SCAQMD rules applicable to the proposed AEC modifications is set forth in Attachment 3.1.

3.1.3 Mitigation Measures

The proposed HBEP modifications will not create a significant air quality or GHG impact, will not increase any daily, quarterly, annual, or other emission limit, and will not require additional mitigation measures.

3.1.4 Consistency with LORS

HBEP will comply with applicable federal, state, and local air quality LORS.

3.1.5 Conditions of Certification

The Project Owner is proposing the following changes to the Air Quality COCs for the facility: These proposed conditions are presented below.

AQ-9 The project owner shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
PM10	Less than or equal to 120 LBS IN ANY ONE MONTH
CO	Less than or equal to 650 LBS IN ANY ONE MONTH
VOC	Less than or equal to 87 104 LBS IN ANY ONE MONTH

The project owner shall calculate compliance with the emission limit(s) by using fuel use data and the following emission factors: VOC: 5.47 lbs/mmcf, PM10: 7.54 lbs/mmcf, CO: 41.9 lbs/mmcf.

The 41.9 lbs/mmcf CO emission factor shall only apply during the interim period after commissioning but prior to the CEMS certification to report CO emissions, not to exceed one year after start of the unit operations.

The auxiliary boiler is subject to this condition.

Verification: The project owner shall provide emissions summary data in compliance with this condition as part of the Quarterly Operation Reports (**AQ-SC8**). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

AQ-19 The 5.0 PPMV NO_x emission limit(s) is averaged over 60 minutes at 3 percent O₂, dry. This limit shall not apply during boiler start ups **and during commissioning**.

The auxiliary boiler is subject to this condition.

Verification: The project owner shall submit CEMS records demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).

AQ-20 The 50.0 PPMV CO emission limit(s) is averaged over 60 minutes at 3 percent O₂, dry. This limit shall not apply during boiler start ups **and during commissioning**.

The auxiliary boiler is subject to this condition.

Verification: The project owner shall submit CEMS records demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).

New condition, AQ-XX The operator shall operate and maintain this equipment according to the following requirements:

The commissioning period shall not exceed 100 hours of fired operation for the auxiliary boiler from the date of initial boiler start-up.

The operator shall vent this equipment to the SCR control system whenever the auxiliary boiler is in operation after commissioning is completed. The operator shall provide the SCAQMD with written notification of the initial startup date. The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition and the records shall be made available to District personnel upon request. The records shall include, but not be limited to, the number of commissioning hours and natural gas fuel usage.

The auxiliary boiler is subject to this condition.

Verification: The project owner shall submit documentation demonstrating compliance with this condition as part of the first annual compliance report following commissioning.

3.1.6 Reference

Yorke Engineering, LLC AES Application for Modification: Change of Condition Request of Permits to Construct, AES Huntington Beach, LLC. June 2019.

3.2 Public Health

3.2.1 Environmental Setting

This PTA does not require changes to the Public Health environmental setting as described in the AFC and the CEC Decision.

3.2.2 Environmental Consequences

The proposed changes will not result in an increase in fuel consumption. Therefore, no increase Toxic Air Contaminant (TAC) and Hazardous Air Pollutant (HAP) emissions is expected. Therefore, no change to the public health impacts used by the Commission to license the project are expected.

3.2.3 Mitigation Measures

No public health impacts are expected, therefore no additional mitigation measures are required.

3.2.4 Consistency with LORS

The project conforms to applicable LORS related to public health.

3.2.5 Conditions of Certification

The proposed modifications do not require changes to The COCs for public health.

4. Potential Effects on the Public

The proposed modifications would have no adverse effect on the public. As previously mentioned, no increase in potential air emissions will occur and there are no changes to activities that were originally considered in the analysis of the HBEP. Therefore, there are no significant adverse effects on public that will result from the proposed modification.

5. List of Property Owners

A list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of any affected project linears and 1000 feet of the project site in accordance with the CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(G)) is provided under separate cover.

6. Potential Effects on Property Owners, the Public, and Parties in the Proceeding

As set forth in Section 3, the proposed modifications will not result in any potentially significant impacts and the project will remain in compliance with all applicable LORS. The project as modified will not differ significantly in potential effects on adjacent land owners, compared with the project as certified. The proposed changes to the auxiliary boiler's commissioning process will have no adverse effect on nearby property owners, the public, or other parties in the application proceeding. The project, therefore, would have no adverse effects on nearby property owners, the public, or other parties in the application proceeding.

7. Potentially Applicable CEQA Exemptions

The proposed modifications would change the commissioning duration for the auxiliary boiler to allow flexibility and to otherwise conform the CEC license to the Title V permit for the facility. These modifications would constitute a negligible expansion of an existing use for an existing facility, and are therefore exempt from CEQA as a permitting activity relating to an existing facility involving a negligible expansion of an existing use pursuant to Section 15301 of the CEQA Guidelines: "Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use." Also the activities are exempt from CEQA under the "Common Sense Exemption" that "CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." (14 CCR § 15061(b)(3).)

Attachment 3.1

Applicable SCAQMD Rules

Rule 212 – Standards for Approving Permits and Issuing Public Notice

Public notice is required for any new or modified equipment under Regulation XXX that may emit air contaminants located within 1,000 feet from the outer boundary of a school, unless the modification will result in a reduction of emissions of air contaminants from the facility and no increase in health risk at any receptor location. The nearest K-12 school, Edison High School, is located over 3,000 feet from the site, therefore public notification requirements of Rule 212 do not apply.

Rule 218 – Continuous Emissions Monitoring

The auxiliary boiler is equipped with CO continuous emissions monitoring system that comply with the requirements of Rule 218 (c), (e), and (f). The changes in operating limits will not affect compliance with this rule.

Regulation III – Fees; Rule 301

The processing fees were determined using Rule 301. Attachment 3.2 documents that the Project Owner has paid the applicable processing fees and has requested expedited permit processing.

Rule 401 – Visible Emissions

The subject equipment is not expected to result in visible emissions. Compliance with this rule is expected.

Rule 402 – Nuisance

This project is not expected to cause injury, detriment, nuisance, or annoyance to the public, based on the control systems and mitigation measures being employed as part of the project.

Rule 403 – Fugitive Dust

The fugitive dust emissions requirements set forth in Rule 403 will be adhered to by the Project Owner during operation. No significant fugitive dust emissions are expected from the facility during normal operations or due to the proposed changes in the operating limits. Therefore, compliance with this rule is expected.

Rule 407 – Liquid and Gaseous Air Contaminants

This rule prohibits an operator from discharging SO₂ and CO into the atmosphere from any equipment in excess of 500 parts per million by volume dry (ppmvd) and 2000 ppmvd, respectively. The CCGT and SCGT SO₂ and CO concentrations are expected to be less than these limits. Therefore, compliance with this rule is expected.

Rule 409 – Combustion Contaminants

This rule prohibits an owner/operator from discharging into the atmosphere from any equipment combustion contaminants exceeding 0.1 grain per cubic foot of gas calculated to 12 percent of CO₂ at standard conditions averaged over a minimum of 15 consecutive minutes. The auxiliary boiler combusts only pipeline quality natural gas. The requested project changes will not adversely impact continued compliance with this rule.

Rule 431.1 – Sulfur Content of Gaseous Fuels

The natural gas fuel supplied to HBEP is the same source as during licensing. Therefore, HBEP is expected to comply with the Rule 431.1 fuel sulfur limit.

Rule 474 – Fuel Burning Equipment-Oxides of Nitrogen

This rule is superseded by NO_x RECLAIM, Rule 2001 (see below).

Rule 475 – Electric Power Generating Equipment

The facility-wide PM emissions from the modification of operating limits is expected to remain approximately the same. Therefore, compliance with this rule is expected.

Regulation IX – New Source Performance Standards

The New Source Performance Standards (NSPS) establishes emission standards for specific emission sources, as published in the Code of Federal Regulations (CFR) and in the Federal Register (FR) by the Environmental Protection Agency (EPA). The following NSPS are applicable to the project.

Regulation X – National Emission Standards for Hazardous Air Pollutants

The National Emission Standards for Hazardous Air Pollutants (NESHAP) regulate the emissions of hazardous air pollutants from specific emission sources. These regulations are periodically updated to reflect actions by the EPA.

NESHAPS for Stationary Gas Turbines – 40 CFR Part 63 Subpart YYYY

Subpart YYYY applies to gas turbines located at major sources of HAP emissions. A major source is defined as a facility with emissions of 10 tons per year or more of a single HAP or 25 tons per year or more of a combination of HAPs. HBEP is not considered a major source of HAP. Therefore, the requirements of Subpart YYYY do not apply.

Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines

The rule is superseded by NO_x RECLAIM, Rule 2001 (See below).

Rule 1135 – Emissions of Oxides of Nitrogen from Electric Power Generating Stations

The rule is superseded by NO_x RECLAIM, Rule 2001 (See below).

Regulation XIII – New Source Review

The proposed changes results in an emission increase of non-attainment pollutants, therefore new source review is required. However, as HBEP is subject to RECLAIM for NO_x, Regulation XIII is not applicable for NO_x.

Rule 1303 – Requirements

Rule 1303 requires use of best available control technology (BACT), emissions modeling and emission offsets.

Best Available Control Technology (BACT)

The proposed changes will not result in a net emissions increase exceeding 1 lb/day. Therefore, BACT is not triggered.

Protection of Visibility

The proposed changes will not increase annual PM₁₀ emissions. Therefore, HBEP is expected to comply with this rule.

Modeling

The proposed changes will not result in an increase in air emissions or alter the assumptions/parameters used in the air dispersion modeling used to demonstrate the project’s conformance with the state and federal ambient air quality standards. Therefore, the proposed changes will not cause or contribute to the violation of an ambient air quality standard.

Offsets

Regulation XIII requires facilities with an air emission increase of greater than four tons per year for VOC, SO₂, and PM₁₀ provide emission offsets, exempt by Rule 1304. As there are no increase in air emissions, HBEP is exempt from the requirement to purchase emission offsets based on Rule 1304(a)(2), which requires the Project Owner to pay an offset fee for SCAQMD-provided offsets.

Rule 1304.1– Electrical Generating Facility Fee for Use of Offset Exemption

Rule 1304(a)(2) required repower projects to pay a fee for the emissions of VOC, PM, and SO_x. Offset fees for NO_x emissions are excluded if the facility is subject to RECLAIM. The Project Owner is currently subject to RECLAIM for NO_x emissions and pays the annual Rule 1304.1 fee to the SCAQMD for HBEP’s

VOC, PM, and SO_x emissions. The Project Owner will continue to comply with Rule 1304.1 when the proposed operational changes are approved by the SCAQMD and the CEC.

Rule 1401 – New Source Review for Air Toxics

No increase in hourly or annual fuel consumption is expected based on the proposed changes. Therefore, the human health risk assessment previously performed for HBEP is still applicable and each permit unit would remain below the applicable Rule 1401 thresholds.

Regulation XVII – Prevention of Significant Deterioration

As noted above, the proposed changes will not result in a physical change to the auxiliary boiler, nor is a change in operation of the auxiliary boiler proposed. Furthermore, the proposed changes will not result in an increase in air emissions. Therefore, PSD review is not applicable.

Rule 1714 – Prevention of Significant Deterioration for Greenhouse Gases

No changes to the electrical generating units are proposed. Therefore, HBEP will comply with the requirements of Rule 1714.

Rule 2005 – New Source Review for RECLAIM

Rule 2005(b)(B) requires that new or modified source(s) will not exceed NO₂ ambient air quality standards. Rule 2005(c)(2) also requires facilities to hold sufficient RTCs to offset the initial year of an emissions increase, including commissioning emissions. The proposed changes to the auxiliary boiler commissioning will not result in a change to the NO_x or SO₂ emission rate or requiring additional NO_x or SO₂ RTCs. Therefore, HBEP complies with the Rule 2005 BACT and modeling requirements.

Regulation XXX – Title V

HBEP has a Title V permit that covers emissions of VOC, NO_x, CO, and PM₁₀. The proposed changes will not result in an increase in air emissions. As a result, the SCAQMD will not require the posting of a public notice for modification to HBEP's Title V permit consistent with Rule 3006.

Regulation XXXI – Acid Rain Permit Program

HBEP is subject to the Acid Rain Permitting Program requirements, NO_x and SO_x emissions will be reported directly to the USEPA. Increases in NO_x and SO_x emissions are expected with this modification and continued compliance is anticipated.