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Glen E. Stephens, P.E. Air Pollution Control Officer

March 21, 2022

Maria Sheen Golder Associates Incorporated Senior Consultant, Environmental Engineer 1000 Enterprise Way, Suite 190 Roseville, CA 95678

SUBJECT: Hydrostor Gem Energy Storage Center (GESC) – CEC Application for Certification

(21-AFC-02)

Dear Ms. Sheen:

The Eastern Kern Air Pollution Control District (District) is in receipt of environmental assessment on an application for certification (AFC) submitted to the California Energy Commission (CEC) in December 2021. According to the AFC, the proposed project consist of a 500-MW, advanced compressed air energy storage facility capable of charging and discharging daily.

The air quality analysis section identified the following sources of air pollution during construction: combustion of fuel in reciprocating internal combustion engines (off-road and mobile sources), traffic on unpaved roads, bulldozing, wind erosion, grading, and material movement. Similarly, during normal operation, emission of air pollutants will occur from the two 5-MW emergency generators driven by diesel piston engines.

As presented in the air quality analysis, the District will have jurisdiction for preparing Determination of Compliance (DOC) and issuing Authority to Construct (ATC) permit for stationary emergency-use piston engines. A preliminary review of the air quality analysis in the AFC, revealed all applicable District Rules and requirements are properly identified and address in air quality analysis. Furthermore, the diesel fueled emergency engines are proposed in accordance with applicable District emission standards. Therefore, based on information provided the proposed project is expected to comply with applicable District Rules and Requirements. However, after CEC's acceptance of the AFC and prior to construction, Hydrostor shall provide the District with Authority to Construct forms required to develop a determination of compliance in accordance with California Code of Regulations, title 20, section 1744.5, and District Rule 210.1. Additionally, it is possible after actual processing commences, additional information may be required to clarify, amplify, correct or otherwise supplement parts of your application of Determination of Compliance. Lastly, please note in accordance with Rule 402, large construction activities involving 10 or more contiguous acres of disturbed surface area are required to submit a Fugitive Dust Emission Control Plan prior to construction.

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Should you have any questions, please contact Miguel Sandoval at (661) 862-5250 or via email at <a href="mailto:sandovalm@kerncounty.com">sandovalm@kerncounty.com</a>.

Sincerely,

Glen E. Stephens, P.E.

Air Pollution Control Officer

GES:MS:tf Enclosures