

ENSR

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October 1, 2007

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| DOCKET | |
| 07-AFC-1 | |
| DATE | OCT 0 1 2007 |
| RECD. | OCT 0 2 2007 |

Mr. Alan J. De Salvio
 Supervising Air Quality Engineer
 Mojave Desert Air Quality Management District
 14306 Park Avenue
 Victorville, CA 92392-2310

Subject: Preliminary Determination of Compliance for Victorville 2 Hybrid Power Project (VV2)

Dear Alan:

On behalf of the City of Victorville and Inland Energy, ENSR is providing comments on the Preliminary Determination of Compliance (PDOC) for the VV2 Project issued on August 29, 2007.

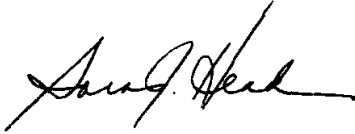
In general, the PDOC looks to be very comprehensive and we'd like to thank the MDAQMD for your timely review and issuance of this draft permit. Our comments reflect only minor clarifications or confirmations on the PDOC, and we are in general agreement on the requirements.

- Page 2 of the PDOC indicates that "A duct burner in each HRSG will provide supplementary firing **during high ambient temperatures....**" Actually, the duct burner could provide supplementary firing during any time of the day, and while high ambient temperatures are the period when the power demand is expected to be highest, it is also the period when the solar array will be most productive and hence the duct burners may not be needed as much. Therefore, the phrase **during high ambient temperatures** should be deleted.
- The VV2 Application indicated that total facility PM10 potential to emit (PTE) is 120.9 tons per year (tpy) while the PDOC (Table 1, page 3) indicates the PTE is 124 tpy. This difference is due to the assumption in the PDOC that 100% of the dissolved solids emitted from the cooling tower will form particles less than 10 microns, while the VV2 Application assumed only 50% of the emissions would be PM10. It's my understanding that the PDOC uses the more conservative assumption to be consistent with the CEC, and not necessarily that MDAQMD disagrees with the 50% assumption.
- Footnote 4 on page 11 of the PDOC references the SCAQMD Board Resolution on September 8, 2006. We note that the SCAQMD Board re-affirmed this transfer of Priority Reserve credits on August 3, 2007.
- Permit condition 12 (page 19) requires that ammonia slip shall be monitored using a Continuous Emissions Monitoring System (CEMS). The nearby High Desert Power Project monitors ammonia slip using NOx analyzers. Please confirm that a system similar to the one in use at HDPP would be acceptable to meet this requirement at the VV2 Project.

Mr. Alan De Salvio
October 1, 2007
Page 2

Please contact me at 805-388-3775 if you have any questions regarding these comments. Again, we thank the MDAQMD for your careful review and consideration of our permit application for the VV2 Project.

Sincerely,



Sara J. Head
Vice President

cc: Mr. John Kessler, California Energy Commission
Mr. Jon B. Roberts, City Manager, Victorville
Mr. Tom Barnett, Inland Energy, Inc.
Mr. Tony Penna, Inland Energy, Inc.
Mr. Mike Carroll, Latham & Watkins