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05-AFC-2C	
DATE	AUG 28 2008
RECD.	SEP 10 2008

August 28, 2008

Mr. Ken Coats
Air Quality Engineer
Engineering and Compliance
South Coast Air Quality Management Agency
21865 Copley Drive
Diamond Bar, Ca 91765-4178

Subject: NSR PM 2.5 Requirements
Walnut Creek, LLC (146536)

Dear Mr. Coats:

Through a July 29, 2008 letter, Mr. Mohsen Nazemi, requested information documenting that this facility's potential to emit would not exceed 100 tons of PM2.5 per year after installation of the proposed equipment. Mr. Nazemi's letter indicates that Appendix S of the Final NSR Rule for PM2.5 would not apply if a facility's projected emissions are less than 100 tons per year.

As you know, SCAQMD's Final Determination of Compliance and Draft Permit was issued for this facility on February 29, 2008. Within this FDOC and its Engineering Analysis / Evaluations, the maximum projected emission rates are presented (Pg 20) as 105,593 lbs/year of PM10. This converts to 52.8 tons / year of PM10. Since PM2.5 is a subset of the PM10 emissions, the facility's projected emissions are well below 100 tons per year.

Please contact me on any further questions.

Sincerely,


Victor Yamada
Director, Environmental, Health & Safety.

Attachment: Page 20, SCAQMD WCEP Engineering Analysis / Evaluation

Copy: Mike Mills, SCAQMD
Robert Worl, CEC
Greg Darvin, Atmospheric Dynamics
Tom McCabe, Edison Mission Energy

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION ENGINEERING ANALYSIS / EVALUATION	PAGES 66	PAGE 20
	APPLICATION NO. 450894 (Master File)	DATE 10-27-2006
	PROCESSED BY: Ken Coats	REVIEWED BY:

Emissions During A Non-Commissioning Year

The tables below show the cumulative emissions during a non-commissioning year from all 5 gas turbines which includes, start-up, shutdown and normal operation, as well as the emissions from the emergency fire pump which is assumed to operate for the designated maximum of 199 hours per year, and the PM₁₀ emissions from the 5-cell cooling tower.

Mass Emission Rates, lb/hr (Non-Commissioning Year)

	Emissions, lb/hr					
	NOx	CO	VOC	SO ₂	PM ₁₀	NH ₃
LMS100PA CTG						
Normal Operations	41.05	60.00	8.55	3.03	30.00	30.35
Start up	51.20	102.00	14.05	3.03	30.00	N/A
Shutdown	55.00	140.00	15.00	3.03	30.00	N/A
Emergency Fire Pump	10.54	0.202	0.112	0.0041	0.067	N/A
5-Cell Cooling Tower	N/A	N/A	N/A	N/A	0.443	N/A
TOTALS	158.69	302.20	37.71	9.09	90.51	30.05

Mass Emission Rates, lb/month (Non-Commissioning Year)

	Emissions, lb/month					
	NOx	CO	VOC	SO ₂	PM ₁₀	NH ₃
LMS100PA CTG						
Normal Operations	15,720.00	22,980.00	3,275.00	1,161.49	11,490.00	11,625.29
Start up	2,084.00	4,080.00	562.00	121.20	1,200.00	N/A
Shutdown	2,200.00	5,600.00	600.00	121.20	1,200.00	N/A
Emergency Fire Pump	174.79	3.35	1.86	0.07	1.12	N/A
5-Cell Cooling Tower	N/A	N/A	N/A	N/A	128.30	N/A
TOTALS	20,178.79	32,663.35	4,438.86	1,403.96	14,019.42	11,625.29

Mass Emission Rates, lb/year (Non-Commissioning Year)

	Emissions, lb/year					
	NOx	CO	VOC	SO ₂	PM ₁₀	NH ₃
LMS100PA CTG						
Normal Operations	113,626.40	166,080.00	23,666.40	8,387.00	83,040.00	83,945.03
Start up	18,235.00	35,700.00	4,920.00	1,060.00	10,500.00	N/A
Shutdown	19,250.00	49,000.00	5,250.00	1,060.00	10,500.00	N/A
Emergency Fire Pump	2,097.46	40.24	22.35	0.82	13.41	N/A
5-Cell Cooling Tower	N/A	N/A	N/A	N/A	1,539.60	N/A
TOTALS	153,208.86	250,820.24	33,858.75	10,507.82	105,593.01	83,945.03

30-Day Averages

The 30 Day Average emissions are calculated in Appendix B for both a commissioning and non-commissioning year for the worst case operating scenario. The worst case operating scenario was defined as OC100 in Table 10 above. The values in the tables below are the cumulative 30 day averages for the entire facility (5 CTGs, the emergency fire pump and the cooling tower).