

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512

January 20, 2009

Mr. Glen Stephens
Air Quality Engineer III
Kern County Air Pollution Control District
2700 "M" Street, Suite 302
Bakersfield, California 93301

DOCKET 08-AFC-2	
DATE	JAN 20 2009
RECD.	JAN 20 2009

**Re: Comments on Preliminary Determination of Compliance
Beacon Solar Energy Project (08-AFC-2)**

Dear Mr. Stephens,

California Energy Commission staff has reviewed the Kern County Air Pollution Control District's Preliminary Determination of Compliance (PDOC) and has the following minor questions and comments for your consideration for inclusion in the Final Determination of Compliance (FDOC).

Staff recommends that the FDOC document be numbered for ease of reference.

Comments on PDOC Conditions

Cooling Tower Operational Condition 3 (page 10 of 24)

Staff believes that the total dissolved solids (TDS) value, shown as 0.0601 lb/gal, in this condition is incorrect. The emission calculations appear to show the correct value of 0.01335 lb/gal, which corresponds to the TDS concentration limit of 1,600 mg/liter, shown in the condition. Please also note that Condition 3 in the PDOC engineering analysis (page 45 of bea-PDOC0369001.pdf) shows different values than Condition 3 in the separate PDOC Conditions document (page 10 of PDOC-03369001-007 (2).pdf) provided to the Energy Commission. The condition in the PDOC engineering analysis document provides values of 720 mg/liter and 0.01335 lb/gal, which are also inconsistent. As noted above, staff believes these two values should be consistently provided as 1,600 mg/liter and 0.01335 lb/gal.

Cooling Tower Operational Condition 5 (page 10 of 24)

Staff would like to know how the correction factor noted in this condition will be determined. Staff has generally found that Particulate Matter (PM) emission rates from cooling towers are calculated without a correction factor.

Comments on Engineering Evaluation

Page 41 – Conclusions Item C. Rule 402

Staff believes that the source category for the three control measures on the top of Page 41 should be provided and would appear to be "Operations".

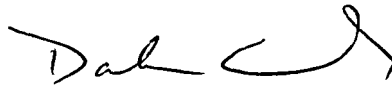
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Page 42 – Conclusions Item E. Rule 407

Staff believes that the natural gas sulfur content should be corrected from 0.025 grains per standard cubic foot to 0.25 grains per 100 standard cubic feet. Staff would note that the use of California diesel fuel in the emergency generator would also ensure compliance of the 0.2% Sulfur Dioxide (SO₂) emission rate limit of this rule for the emergency generator.

If you have any questions, please contact Keith Golden of my staff at (916) 653-1643. Thank you for the opportunity to comment on the Beacon Solar Energy Project Preliminary Determination of Compliance.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale Edwards". The signature is fluid and cursive, with a large initial "D" and a stylized "E".

DALE EDWARDS, Manager
Environmental Protection Office
Siting, Transmission and Environmental
Protection Division

cc: Docket 08-AFC-2
Proof of Service List