

KERN COUNTY AIR POLLUTION CONTROL DISTRICT  
DAVID L. JONES, APCO



February 17, 2009

DOCKET	
08-AFC-2	
DATE	FEB 17 2009
RECD.	FEB 25 2009

Mr. Dale Edwards, Manager  
Environmental Protection Office  
Siting, Transmissions and Environmental  
Protection Division  
California Energy Commissions  
1516 Ninth Street  
Sacramento, California 95814-5512

SUBJECT: Beacon Solar, Application No.: 0369001-007 - Project No.: 080414

Dear Mr. Edwards:

The Kern County Air Pollution Control District is in receipt of your comments regarding the Preliminary Documents of Compliance (PDOC) for the Beacon Solar Energy Project. In response to your comments the District offers the following statements:

District Staff will ensure page numbers will be included on the Final Document of Compliance (FDOC).

Cooling Tower

District Staff confirms CEC Staff's statement the total dissolved solids (TDS) value of 0.0601-lb/gal, the TDS value of 720-mg/liter and use of a correction factor in the calculation of particulate matter (PM) emissions are incorrect. District staff will correct errors by eliminating use of 720-mg/liter for 1600-mg/liter and 0.0601-lb/gal for 0.01335-lb/gal. Additionally, the correction factor utilized for condition 5 for Cooling Tower PDOC will be eliminated. Calculations utilized to determine potential to emit were based on 0.01335-lb/gal; therefore, calculated emissions need not be corrected.

Conclusion Item C (Rule 402)

CEC staff recognized an error regarding the Source Category and corresponding Control Measure. The Source Category was omitted. The Source Category is Unpaved Roads. The wording will be added to the FDOC.

PROOF OF SERVICE (REVISED 2/19/09) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 2/25/09  
MS

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Conclusion Item E (Rule 407)

CEC staff recognized an error regarding the sulfur content of natural gas. District staff utilized an emission factor of 0.025 grains per standard cubic foot (gr/scf). CEC staff recommended a sulfur content of 0.25-gr/100-scf. District staff confirmed this concentration with PG&E sulfur reports. Therefore, the maximum sulfur content of natural gas shall be changed to 0.25-gr/100-scf.

Additionally, District staff omitted sulfur emissions from diesel fuel used for the emergency generator. District BACT policy required use of CARB diesel with a sulfur content of 0.0015%. Therefore, the maximum sulfur content of diesel fuel shall be changed to 0.0015%. The above emission factors were utilized in calculating emissions; therefore, these changes are only to the Engineering Analysis and FDOC, and will not result in a change in emissions.

The above changes shall be included in the Engineering Analysis and FDOC, a copy of which will be sent to you upon completion. Thank you, for your comments. Should you have any questions, please telephone Glen Stephens of our office at (661) 862-5250.

Sincerely,



Glen E. Stephens, P.E.  
Air Quality Engineer III

GES:tf



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION  
For the **BEACON SOLAR ENERGY**  
**PROJECT**

Docket No. 08-AFC-2

PROOF OF SERVICE

(Revised 2/9/09)

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**INTERESTED AGENCIES**

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**INTERVENORS**

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**ENERGY COMMISSION**

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**DECLARATION OF SERVICE**

I, Maria Santourdjian, declare that on February 25, 2009, I served and filed copies of the attached Beacon Solar Energy Project (08-AFC-2) KCAPCD Comment Letter, dated February 17, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

**[[www.energy.ca.gov/sitingcases/beacon](http://www.energy.ca.gov/sitingcases/beacon)]**. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

**(Check all that Apply)**

**FOR SERVICE TO ALL OTHER PARTIES:**

sent electronically to all email addresses on the Proof of Service list;

by personal delivery or by depositing in the United States mail at Sacramento, CA with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

**FOR FILING WITH THE ENERGY COMMISSION:**

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (***preferred method***);

**OR**

depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 08-AFC-4

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Maria Santourdjian