

**INLAND EMPIRE ENERGY CENTER
LICENSE AMENDMENT
01-AFC-17C**

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Attachment 1 – Proposed Changes to Conditions of Certification

Attachment 2 – List of Property Owners and Tenants

1.0 INTRODUCTION

1.1 Overview of Amendment

In December 2003, the California Energy Commission (CEC) approved the Inland Empire Energy Center Project (IEEC). The project is located in Menifee, in southern Riverside County. Construction of IEEC began on August 5, 2005, and first fire for Units 1 and 2 occurred on May 18, 2008, and July 22, 2008, respectively.

In August 2005, the Commission approved the petition to change the configuration of the IEEC project (01-AFC-17C). As part of this approval, the Commission imposed a number of air quality conditions on the project based on the South Coast Air Quality Management District's (SCAQMD's) Preliminary Determination of Compliance (DOC) in effect at that time. Following several changes made to the SCAQMD RECLAIM/Title V permit in 2006, IEEC filed an amendment petition with the CEC to make the Commission air quality conditions of certification consistent with the SCAQMD conditions in effect at that time. On April 11, 2007, the Commission approved this petition. Over the past two years additional changes have been made to the SCAQMD permit for the IEEC project as the project completed its commissioning activities and commenced commercial operation. Consequently, the purpose of this petition is to amend the Commission air quality conditions of certification to make them consistent with the current SCAQMD RECLAIM/Title V permit for the IEEC project.

1.2 Summary of Environmental Impacts

Section 1769(a)(1)(E) of the CEC Siting Regulations requires that an analysis be conducted to address any potential impacts that the proposed revisions may have on the environment and to propose measures to mitigate significant adverse impacts. Section 1769(a)(1)(F) requires a discussion of the impact of proposed revisions on the facility's ability to comply with applicable laws, ordinances, regulations, and standards (LORS). Section 3.0 of this document discusses the potential impacts of the Amendment on the environment, as well as the consistency of the requested change with LORS. Section 3.0 concludes that there will be no significant adverse environmental impacts associated with this Amendment and that the project, as amended, will comply with applicable LORS.

1.3 Consistency of Amendment with License

Section 1769(a)(1)(D) of the CEC Siting Regulations requires a discussion of the Amendment's consistency with the LORS and whether the modification being sought is based on new information that changes or undermines the assumptions, rationale, findings, or other basis of the final decision. If the project is no longer consistent with the license, an

explanation of why the modification should be permitted must be provided. The changes proposed herein are consistent with the project's CEC license and relevant LORS. These proposed changes do not undermine any basis for the CEC's licensing decision.

2.0 DESCRIPTION OF PROJECT AMENDMENT

Consistent with the California Energy Commission Siting Regulations Section 1769(a)(1)(A) and (B), this section includes a complete description of the proposed project modification as well as the necessity for the Amendment.

When the Commission approved the petition to change the configuration of the IEEC project in August 2005 (01-AFC-17C), the Commission imposed a number of air quality conditions on the project based on the SCAQMD's Preliminary DOC. The public notice for the SCAQMD's Preliminary DOC was published on June 1, 2005. Following the close of the public comment period on the Preliminary DOC, the SCAQMD issued the RECLAIM/Title V Facility Permit for the IEEC project on August 5, 2005. Several revisions to the SCAQMD permit occurred following August 5, 2005 with the changes reflected in a June 6, 2006 modified SCAQMD RECLAIM/Title V Facility Permit. Based on a conforming amendment petition filed on October 5, 2006, on April 11, 2007 the Commission approved the requested changes to the air quality conditions of certification to make them consistent with the June 6, 2006 SCAQMD permit. Since this time, several additional changes have been made to the SCAQMD permit as a result of the following requests:

- In response to a May 4, 2007 letter from IEEC LLC, on September 21, 2007 the SCAQMD issued a minor revision to the RECLAIM/Title V Facility Permit for the IEEC project related to a change in the specifications for the auxiliary boiler.
- In response to a March 21, 2008 letter from Sierra Research on behalf of IEEC LLC, on April 4, 2008 the SCAQMD issued a minor revision to the RECLAIM/Title V Facility Permit for the IEEC project related to permit condition changes needed to allow commissioning of the auxiliary boiler.
- In response to March 18, 2008 and June 4, 2008 letters from IEEC LLC, on October 17, 2008 the SCAQMD issued a minor revision to the RECLAIM/Title V Facility Permit for the IEEC project related to the auxiliary boiler burner model designation, storage capacity for the on-site aqueous ammonia storage tanks, and emission limits applicable to the auxiliary boiler during boiler startups/shutdowns.
- In response to a March 3, 2009 letter from Sierra Research on behalf of IEEC LLC, on June 3, 2009 the SCAQMD issued a minor revision to the RECLAIM/Title V Facility Permit for the IEEC project related to allowable operations for the emergency generators at the site.

- In response to February 19, 2009 and May 12, 2009 letters from IEEC LLC, on August 25, 2009 the SCAQMD issued a minor revision to the RECLAIM/Title V Facility Permit for the IEEC project related to allowable CO emissions from the combined cycle units during startups and shutdowns.

The purpose of the proposed Amendment is to make the Commission air quality conditions of certification consistent with the current SCAQMD RECLAIM/Title V permit for the IEEC project.

2.1 Necessity of Proposed Amendment

Sections 1769(a)(1)(B) and (C) of the CEC Siting Regulations require a discussion of the necessity for the proposed revisions to the Inland Empire Energy Center Project and whether the revisions are based on information known by the petitioner during the certification proceeding.

As discussed above, the purpose of the proposed Amendment is to make the Commission air quality conditions of certification consistent with the current SCAQMD RECLAIM/Title V permit for the IEEC project. The proposed changes to the air quality conditions of certification are the result of changes to the SCAQMD's RECLAIM/Title V permit that occurred after the completion of IEEC's certification process.

3.0 Environmental Analysis of the Amendment

This section examines whether the project enhancement set forth in this Amendment may result in additional environmental impacts. An environmental analysis for the modification identified in this Amendment is included below. The analysis concludes that there will be no significant adverse environmental impacts associated with this Amendment and that the project, as amended, will comply with all applicable LORS.

3.1 Air Quality

The following paragraphs discuss the effect on the Commission air quality conditions of certification associated with the various changes to the SCAQMD permit that occurred after the CEC approval of the 2007 amendment to the IEEC air quality conditions of certification.

September 21, 2007 SCAQMD Permit

Conditions Affected:

- AQ-SC16 Attachment Air Quality 1: Equipment Description for Unit D3

Date of SCAQMD Permit Change: September 21, 2007 Minor Change to RECLAIM/Title V Facility Permit

Reason for Change

In a May 4, 2007 letter to the SCAQMD, IEEC LLC requested an administrative revision to the RECLAIM/Title V permit for the IEEC project. The request was a change to the make and model number of the auxiliary boiler (Device D3) from a Nebraska Model NS-F-76 to a Rentech Model 2005-84. The make/model number and the maximum heat input rating of the auxiliary boiler burner remained unchanged. There was also no change to the selective catalytic reduction (SCR) system or the auxiliary boiler stack height. Due to the fact that there was no change to the burner/SCR system, the emission levels/rates for the boiler remain unchanged from those previously analyzed during the permitting process. Therefore, this permit change did not affect previously modeled air quality impacts or the amount of emission offsets previously provided for the equipment.

April 4, 2008 SCAQMD Permit

Conditions Affected:

- Conditions AQ-39, AQ-42
- AQ-SC16 Attachment Air Quality 1: Equipment Description for Unit D3 (additional NOx emission factor)

Date of SCAQMD Permit Change: April 4, 2008 Minor Change to RECLAIM/Title V Facility Permit

Reason for Change

In a March 21, 2008 letter to the SCAQMD, IEEC LLC requested a permit change to allow up to 200 hours of auxiliary boiler operation prior to the installation/operation of the SCR system. This boiler operation without the SCR installed was needed to avoid contamination/poisoning of the SCR during the initial operation of the boiler. Due to the elevated NOx emissions during the auxiliary boiler operation without the SCR installed/operating, a 200-hour exemption from the 1-hour average NOx permit limit of 7 ppm @ 3% O₂ needed to be added to the permit. In addition, in order to calculate and report RECLAIM NOx emissions during this 200-hour period, a NOx emission factor of 100.67 lbs/mmscf needed to be added to the permit. Finally, to confirm that there would be no significant impact on the 1-hr NO₂ ambient air quality standards, as part of the permit application package, IEEC included an analysis of the effect this 200-hour exemption would have on the NO₂ standards.

While this permit change includes a short-term exemption from the 1-hr NO_x ppm limit for commissioning activities, due to the limited number of commissioning hours and relatively low boiler operating levels during the commissioning activities, there was no need to increase the amount of annual NO_x RECLAIM trading credits required by the permit that must be purchased prior to each compliance year.

October 17, 2008 SCAQMD Permit

Conditions Affected:

- Conditions AQ-42, AQ-45

Date of SCAQMD Permit Change: October 17, 2008 Minor Change to RECLAIM/ Title V Facility Permit

Reason for Change

In a March 18, 2008 letter from IEEC LLC to the SCAQMD, IEEC LLC requested a couple of minor equipment description changes on the SCAQMD permit. For the auxiliary boiler (Device D3), IEEC LLC requested that the burner model be changed from a Todd Variflare Model VII690VGXXX to a John Zink Model VII690VGXXX. This change was needed because John Zinc had acquired Todd Combustion. Therefore, John Zinc appeared on the burner nameplate rather than Todd Combustion. The burner remained a 152.11 MMBtu/hr Model VII690VGXXX low-NO_x burner. Since the requested change only impacted the manufacturer's name on the equipment identification plate and did not represent a physical difference between the permitted and actual burner, the request was an administrative change to the permit. In addition to this minor permit change, IEEC LLC also requested that the storage capacity listed on the SCAQMD permit for the aqueous storage tanks (Devices D7 and D8) be changed from 16,000 gallons per tank to 16,900 gallons per tank. Since this change did not impact emissions (tanks will continue to be vented back to the tanker during filling) or SCAQMD regulatory requirements, this request qualified as a minor permit change.

In a June 4, 2008 letter from IEEC LLC to the SCAQMD, IEEC LLC requested an exemption from the 1-hour average NO_x emission limit of 7.0 ppm @ 3% O₂ and the 1-hour average NH₃ emission limit of 5 ppm @ 3% O₂ during auxiliary boiler (Device D3) startups and shutdowns. These exemptions were needed because the required SCR system operating temperatures and corresponding NO_x and NH₃

control levels were not achieved during boiler startups/shutdowns. To confirm that there would be no significant impact on the 1-hr NO₂ ambient air quality standards, as part of the permit application package IEEC LLC included an analysis of the effect these exemptions would have on the NO₂ standards. While this permit change includes a short-term exemption from the 1-hr NO_x ppm limit during auxiliary boiler startups/shutdowns, due to the limited number of these startups/shutdowns that are expected to occur during a year, there was no need to increase the amount of annual NO_x RECLAIM trading credits required by the permit that must be purchased prior to each compliance year.

June 3, 2009 SCAQMD Permit

Conditions Affected:

- Permit Conditions AQ-48, AQ-51

Date of SCAQMD Permit Change: June 3, 2009 Minor Change to RECLAIM/Title V Facility Permit

Reason for Change

In a March 3, 2009 letter to the SCAQMD, IEEC LLC requested a permit change to clarify the number of hours allowed for emergency and non-emergency operation of the two emergency generator engines (Devices D9 and D10). As allowed under both CARB's I/C Engine Air Toxic Control Measure (ATCM) and SCAQMD emergency engine policy, for each of these engines a combined total of 200 hours/year is allowed for emergency and non-emergency operation. Under the ATCM, non-emergency operation (operation for testing/maintenance purposes) for each engine is limited to 50 hours/year. Due to the increase in the allowed number of annual operation hours, the amount of NO_x RECLAIM trading credits (RTCs) that IEEC must hold prior to each compliance year was increased from 1,946 lbs/year to 7,784 lbs/year per engine.

August 25, 2009 SCAQMD Permit

Conditions Affected:

- Condition AQ-18

Date of SCAQMD Permit Change: August 25, 2009 Minor Change to RECLAIM/
Title V Facility Permit

Reason for Change

In February 19, 2009 and May 12, 2009 letters to the SCAQMD, IEEC LLC requested a change to the permit to allow an increase in the CO emission limit during startups/shutdowns of the two gas turbines (Devices D1 and D2). The requested change increased the allowed CO emissions during gas turbine startups/shutdowns from 95 lbs/hr to 800 lbs/hr and from 300 lbs/event to 2000 lbs/event. While the gas turbine startup/shutdown CO emission limits in the existing SCAQMD permit were based on the best information available at the time that the permit was issued, operating data collected following the gas turbine commissioning period indicated that actual CO emissions during startups/shutdowns were higher than the allowable limits. To confirm that there would be no significant impact on the 1-hr or 8-hr CO ambient air quality standards, as part of the permit application package IEEC LLC included an analysis of the effect this increase in the startup/shutdown CO emission levels would have on the CO standards. Due to the limited number of these gas turbine startups/shutdowns that are expected to occur during a month, there was no need to increase the monthly CO emission limits in the permit. With no increase in the allowable monthly CO emission limits, the corresponding maximum allowable annual CO emissions also did not increase as a result of this permit change.

SCAQMD Variance

Conditions Affected:

- Condition AQ-18

Date of Change: October 7, 2008 SCAQMD Short Variance Hearing followed by a
January 14, 2009 Regular Variance Hearing

Reason for Change

On August 17, 2008, Unit 2 unexpectedly tripped offline and shut down during routine commissioning testing. Unit 1 had successfully completed its commissioning activities, and was shut down at the time of the Unit 2 trip as a precautionary measure. Following the shutdown of the units, the turbine vendor, General Electric, performed an assessment and determined that Unit 2 had experienced damage to some of its internal components. Prior to the shutdown of the units, a total of 466

commissioning hours had been consumed. As a result of the unexpected trip of Unit 2 and associated shutdown of Unit 1, a portion of Unit 1's commissioning activities, and much of Unit 2's commissioning activities, will need to be re-performed. The turbine vendor estimates that 72 hours will be required, after restart, to ensure that Unit 1 is in compliance with all of its emission limits, and up to 200 hours will be required after Unit 2 is restarted. The sum of the 466 commissioning hours already consumed, plus 72 additional hours for Unit 1, plus 200 hours for Unit 2, is 738 hours.

In a variance petition filed with the SCAQMD Hearing Board on September 23, 2008, IEEC LLC requested variance relief from the SCAQMD permit condition limiting the total number of commissioning hours. During an October 7, 2008 hearing, the SCAQMD Hearing Board granted a short-term variance for Units 1 and 2 increasing the total allowable commissioning period from 509 to 738 operating hours. This increase in the total number of allowable commissioning hours (738 hours) was once again approved by the SCAQMD Hearing Board during a January 14, 2009 regular variance hearing.

Unit 1 was restarted on January 5, 2009, and the unit successfully completed its compliance/CEM certification testing on April 17, 2009. Unit 2 remains shut down and is expected to restart sometime during the first quarter of 2010. The delay in the restart of Unit 2 is due to the additional time needed for the evaluation of the August 17, 2008 incident and engineering of new parts. Included in the time needed for this period was gathering operating data from Unit 1 following its restart on January 5, 2009, to use in the evaluation of the incident. Furthermore, these are new units, and the replacement parts are custom made, requiring more time for manufacturing and the subsequent installation.

As discussed above, many of the proposed changes to the air quality conditions of certification are minor equipment description changes that will not result in less stringent emissions limits, testing/monitoring requirements, and/or recordkeeping/reporting requirements. However, there are some proposed changes that will increase the allowable emissions for the two gas turbines and auxiliary boiler. There is also a proposed change clarifying the allowable annual operating hours for the emergency generator engines. Table 3.1-1 summarizes these proposed changes and shows that they will not create significant air quality impacts.

Table 3.1-1			
Proposed Change	New Air Quality Impacts	Previously Analyzed Air Quality Impacts	Conclusion
AQ-18: Increase in the total number of commissioning hours for the gas turbines	N/A	N/A	While there is an increase in the total number of allowed commissioning hours, due to the associated extended shutdown period for the gas turbines there is no expected increase in the maximum monthly or annual emission levels previously analyzed for the project. In addition, there is no need to increase the existing monthly and/or annual emission limits for the gas turbines. Therefore, no new significant impacts are expected for this proposed change.
AQ-18: Increase in the startup/shutdown CO lbs/hr and lbs/event emission limits for the gas turbines	1,646 µg/m ³ (ambient 1-hr CO impact ¹) 957 µg/m ³ (ambient 8-hr CO impact ¹)	780 µg/m ³ (ambient 1-hr CO impact ²) 686 µg/m ³ (ambient 8-hr CO impact ²)	While the new impacts are higher than the levels previously analyzed, because the new impacts are well below the 1-hr and 8-hr CO standards of 23,000 µg/m ³ and 10,000 µg/m ³ , respectively, no new significant impacts are expected for this proposed change.
AQ-42: Commissioning exemption from 1-hr NOx limit for auxiliary boiler	123 µg/m ³ (1-hr NO ₂ impact ³)	268 µg/m ³ (1-hr NO ₂ impact ⁴)	Since the new impacts are below the maximum impacts previously analyzed for the project, no new significant impacts are expected for this proposed change.
AQ-42: Startup/shutdown exemption from 1-hr NOx limit	44 µg/m ³ (1-hr NO ₂ impact ⁵)	268 µg/m ³ (1-hr NO ₂ impact ⁶)	Since the new impacts are below the maximum impacts previously analyzed for the project, no new

¹ May 12, 2009 letter from IEEC LLC to the SCAQMD.

² June 8, 2005 CEC Staff Analysis of Proposed Modification to IEEC Project, Table 5. This is the maximum project impact during the commissioning of the gas turbines.

³ March 21, 2008 letter from Sierra Research to the SCAQMD.

⁴ June 8, 2005 CEC Staff Analysis of Proposed Modification to IEEC Project, Table 8. This is the maximum project impact during gas turbine startups. Since the gas turbines will not operate during the commissioning activities of the auxiliary boiler, this remains the maximum expected impact for the project.

⁵ June 4, 2008 letter from IEEC LLC to the SCAQMD.

Table 3.1-1			
Proposed Change	New Air Quality Impacts	Previously Analyzed Air Quality Impacts	Conclusion
for auxiliary boiler			significant impacts are expected for this proposed change.
AQ-51 Clarification regarding the allowable emergency and non-emergency operation for the emergency generator engines	7,784 lbs/year NOx RTC held prior to each compliance year	1,946 lbs/year NOx RTC held prior to each compliance year	While this permit change clarifies the difference between the allowable emergency and non-emergency annual operating hours for the emergency generator engines, it is important to remember that the gas turbines will not be operating during the emergency operation of the engines. Consequently, there is no expected increase in the maximum annual modeled project impacts associated with this permit change. Therefore, no new significant impacts are expected for this proposed change.

⁶ June 8, 2005 CEC Staff Analysis of Proposed Modification to IEEC Project, Table 8. This is the maximum project impact during gas turbine startups. Since the gas turbines will not operate during the startup of the auxiliary boiler, this remains the maximum expected impact for the project.

3.2 Biological Resources

The proposed Amendment will not result in biological resource impacts any different than those analyzed by the CEC during licensing of the project.

3.3 Cultural Resources

The proposed Amendment will not result in cultural resource impacts any different than those analyzed by the CEC during licensing of the project.

3.4 Land Use

The proposed Amendment will not result in land use impacts any different than those analyzed by the CEC during licensing of the project.

3.5 Noise

The proposed Amendment will not result in noise impacts any different than those analyzed by the CEC during licensing of the project.

3.6 Public Health

The proposed Amendment will not result in public health impacts any different than those analyzed by the CEC during licensing of the project.

3.7 Worker Safety & Health

The proposed Amendment will not result in worker safety and health impacts any different than those analyzed by the CEC during licensing of the project.

3.8 Socioeconomics

The proposed Amendment will not result in socioeconomic impacts any different than those analyzed by the CEC during licensing of the project.

3.9 Agriculture & Soils

The proposed Amendment will not result in agricultural and soil impacts any different than those analyzed by the CEC during licensing of the project.

3.10 Traffic & Transportation

As discussed in Section 3.1, the storage capacity of the aqueous ammonia storage tanks listed in the air quality conditions of certification is increasing from 16,000 to 16,900 gallons per tank to match the actual size of the installed tanks. While the maximum storage capacity of the aqueous ammonia storage tanks increased, there is no corresponding change to the maximum allowable onsite aqueous ammonia storage amount (see Section 3.12) or maximum daily number of aqueous ammonia tanker truck deliveries previously analyzed for the Proposed Project. Consequently, the proposed Amendment will not result in traffic and transport impacts any different than those analyzed by the CEC during licensing of the project.

3.11 Visual Resources

The proposed Amendment will not result in visual resource impacts any different than those analyzed by the CEC during licensing of the project.

3.12 Hazardous Materials Management

As discussed in Section 3.1, October 17, 2008, the storage capacity of the aqueous ammonia storage tanks listed in the air quality conditions of certification is increasing from 16,000 to 16,900 gallons per tank to match the actual size of the installed tanks. While the maximum storage capacity of the aqueous ammonia storage tanks increased, the Project continues to limit the actual amount of aqueous ammonia stored to below 16,000 gallons per tank, thus it is not necessary to increase the onsite aqueous ammonia storage limit of 32,000 gallons (combined total for two tanks) listed in the CEC Approval of the Project.⁷ Since there is no change in the maximum allowable aqueous ammonia storage amount, which is the basis for the worst-case impacts previously analyzed for the Project,⁸ the proposed Amendment for this condition, will not result in hazardous materials management impacts any different than those analyzed by the CEC during licensing of the project.

3.13 Waste Management

The proposed Amendment will not result in waste management impacts any different than those analyzed by the CEC during licensing of the project.

⁷ December 2003 Commissioning Decision approving the Inland Empire Energy Center, Hazardous Materials Management (Section D), Appendix C (limits on hazardous materials storage).

⁸ For example, in the June 8, 2005 Staff Analysis of the Proposed Project Modification (page 65), the worst-case spill analysis was based on an aqueous ammonia storage tank failure with a 16,000 gallon aqueous ammonia spill.

3.14 Water Resources

The proposed Amendment will not result in water resource impacts any different than those analyzed by the CEC during licensing of the project.

3.15 Geologic Hazards and Resources

The proposed Amendment will not result in geologic hazard and resource impacts any different than those analyzed by the CEC during licensing of the project.

3.16 Paleontological Resources

The proposed Amendment will not result in paleontological resource impacts any different than those analyzed by the CEC during licensing of the project.

3.17 Cumulative Impacts

The proposed Amendment will not result in cumulative impacts any different than those analyzed by the CEC during licensing of the project.

3.18 Laws, Ordinances, Regulations, Standards

The Final Decision certifying the Inland Empire Energy Center found the project to be in compliance with applicable LORS. As described in this Amendment, the proposed changes to the air quality conditions of certification are also consistent with all applicable LORS, and the Amendment will not alter the assumptions or conclusions made in the CEC's Final Decision for the Inland Empire Energy Center.

4.0 Proposed Modifications to the Conditions of Certification

Consistent with the requirements of CEC Siting Regulations Section 1769(a)(1)(A), potential modifications to the project's Conditions of Certification were evaluated. IEEC LLC is requesting approval of the proposed changes to the conditions of certification shown in Attachment 1. Requested changes are shown in underline/strikeout format.

5.0 Potential Effects on the Public

Consistent with the CEC Siting Regulations Section 1769(a)(1)(G), this section discusses the proposed project modification effects on the public. The proposed project modifications contained in this Amendment will have no significant impacts on the environment, and will be in compliance with all applicable LORS. Accordingly, there will be no adverse impacts on the public associated with this Amendment.

6.0 List of Property Owners

CEC Siting Regulations Section 1769(a)(1)(H) requires a list of the property owners and/or tenants potentially affected by the proposed Amendment. All property owners and tenants potentially affected by this Amendment that are located within 1,000 feet of the project site are listed in Attachment 2.

7.0 POTENTIAL EFFECTS ON PROPERTY OWNERS

Consistent with the CEC Siting Regulation Section 1769(a)(1)(I), this section addresses potential effects of the proposed Amendment on nearby property owners, the public, and parties in the application proceeding. Because the proposed Amendment will have no significant impacts on the environment, there will not be any significant impacts to nearby property owners, the public, or nearby businesses.

ATTACHMENT 1

PROPOSED CHANGES TO CONDITIONS OF CERTIFICATION

DISTRICT CONDITIONS OF CERTIFICATION – DETERMINATION OF COMPLIANCE

Gas Turbines and SCR

AQ-18 The operator shall operate and maintain this equipment according to the following requirements:

The commissioning period shall not exceed ~~509~~ 738 hours of operation for both turbines ~~during the first 180 calendar days from the date of initial start-up.~~

Startup/shutdown time shall not exceed 4 hours per day per gas turbine, except for a cold startup and combustor-tuning activities, which shall not exceed 6 hours per day per gas turbine. A cold startup shall be defined as a startup of the gas turbine after 72 hours of non-operation. Combustor-tuning activities shall be defined as all testing, adjusting, tuning, and calibration activities recommended by the turbine manufacturer to ensure safe, reliable, and in-specification operation of the turbine.

Startup/shutdown and combustor-tuning activity emissions shall not exceed 408 lbs/hr NOx and ~~95~~ 800 lbs/hr CO averaged for the duration of the startup. The startup/shutdown and combustor-tuning activity emissions shall not exceed 803 lbs/event NOx and ~~300~~ 2000 lbs/event CO.

Monthly startup/shutdown time shall not exceed 31 hours. Shutdown time does not include non-operation time.

The operator shall provide the AQMD with written notification of the initial startup date. Written records of commissioning, startups, shutdowns, and combustor-tuning activities shall be maintained and made available upon request from AQMD. (SCAQMD E193-2)

Verification: The CPM may increase the total number of commissioning hours provided that such an increase was approved by the SCAQMD Hearing Board as part of a variance proceeding for the project. The project owner shall submit to the CPM the final commissioning status report as in Condition AQ-17. The project owner shall provide startup/shutdown and combustor-tuning activity occurrence, duration, and emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC8). The project owner shall make the site available for inspection of the commissioning, start-up/shutdown, and combustor-tuning activity records by representatives of the District, CARB and the Commission.

Auxiliary Boiler and SCR

AQ-39 The 8.49 lbs/mmscf NO_x emission limit(s) shall only apply after the installation and operation of the SCR catalyst during the interim reporting period to report RECLAIM emissions. (SCAQMD A99-2) The 100.67 lbs/mmscf NO_x emission limit(s) shall only apply prior to the installation of the SCR catalyst during the interim reporting period to report RECLAIM emissions. (SCAQMD A99-4)

Verification: The project owner shall submit to the CPM and APCO auxiliary boiler emissions data demonstrating compliance with this condition through the use of the required RECLAIM emission factor, as appropriate, as part of the Quarterly Operation Report (**AQ-SC8**).

AQ-42 The 7 ppmv NO_x emission limit(s) is averaged over one hour at 3 percent oxygen, dry basis. This limit shall not apply during the initial auxiliary boiler commissioning period not to exceed 200 hours or until the SCR catalyst is installed and operational, whichever occurs first. This limit shall not apply during startup and shutdown periods. Startup shall not exceed 75 minutes per occurrence and shutdown shall not exceed 30 minutes per occurrence. There shall be no more than one startup and one shutdown per day. (SCAQMD A195-4)

Verification: The project owner shall submit to the CPM and APCO auxiliary boiler CEMS emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (**AQ-SC8**).

AQ-45 The 5 ppmv NH₃ emission limit(s) is averaged over 1 hour at 3 percent oxygen, dry basis. The limit shall not apply during the auxiliary boiler D3 startup process when the SCR catalyst temperature is below 480 degree F. The limit shall not apply during the auxiliary boiler D3 boiler shutdowns. (SCAQMD A195-8)

Verification: See verification for Conditions **AQ-32**, **AQ-33**, and **AQ-46**.

Two Emergency Generator Engines and One Fire Pump Engine

AQ-48 Emergency Generator Engines: The operator shall limit the operating time of each engine to no more than ~~50~~200 hours per year. The 200 hours annual limit includes no more than 50 hours in any one year for maintenance and testing purposes. (SCAQMD C1-1) Emergency Fire Pump Engine: The operator shall limit the operating time to no more than 50 hours in any one year. (SCAQMD C1-3)

Verification: The project owner shall submit to the CPM and APCO the emergency generator and fire pump IC engines operations data demonstrating compliance with this condition as part of the Quarterly Operation Report (**AQ-SC8**).

AQ-51 The emergency generator engines shall not be operated unless the operator demonstrates to the Executive Officer that the facility holds sufficient RTCs to offset the prorated annual emissions increase for the first compliance year of operation. In addition, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the first compliance year of operation, the facility holds sufficient RTCs in an amount equal to the annual emissions increase. To comply with this condition, the operator shall prior to the first compliance year hold a minimum NOx RTCs of 1,946 lbs for each engine. This condition shall apply during the first twelve months of operation. To comply with this condition, the operator shall, prior to the beginning of all years subsequent to the first compliance year, hold a minimum NOx RTCs of ~~1,946~~ 7,784 lbs for each engine. In accordance with Rule 2005(f), unused RTCs may be sold only during the reconciliation period for the fourth quarter of the applicable compliance year inclusive of the first compliance year. (SCAQMD I296-4)**Verification:** The project owner shall submit to the CPM copies of all RECLAIM reports filed with the District demonstrating compliance with this condition as part of the Quarterly Operation Report (**AQ-SC8**).

Attachment Air Quality 1 – AQ-SC16, Equipment Description

EQUIPMENT DESCRIPTION

Section H of the facility permit: Permit to Construct and temporary Permit to Operate

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
PROCESS 1: COMBUSTION AND POWER GENERATION					
SYSTEM 2: AUXILIARY EQUIPMENT					
BOILER, AUXILIARY BOILER, NATURAL GAS, NEBRASKA, MODEL NS-F-76-RENTECH, MODEL 2005-84 , WITH LOW NOX BURNER, 152.12 MMBtu/HR, WITH: A/N: 456170 <u>483511</u> Permit to Construct Issued: 6/02/06 <u>10/16/08</u> BURNER, NATURAL GAS, TODD-VARIFLAME JOHN ZINK , MODEL VII690VGXXX X , WITH LOW NOX BURNER, 152.12 MMBTU/HR	D3	C6	NOx MAJOR SOURCE**	NOx: 7.0 PPMV NATURAL GAS (4) [RULE 2005 BACT, RULE1703-PSD Analysis]; NOx: 8.49 LBS/MMSCF NATURAL GAS (1) [RULE 2012]; <u>100.67 LBS/MMSCF NATURAL GAS (1A) [RULE 2012]</u> CO: 50 PPMV NATURAL GAS (4) [RULE 1303 BACT]; CO: 400 PPMV NATURAL GAS (5A) [RULE 1146]; CO: 2,000 PPMV NATURAL GAS (5) [RULE 407]; VOC: 10 PPMV NATURAL GAS (4) [RULE 1303 BACT] PM10: 7.26 LB/MMSCF NATURAL GAS (4) [RULE 1303-BACT]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409]; H2S: 0.25 GRAINS PER 100 SCF NATURAL GAS (4) [RULE 1303-BACT]	A63.2, A99.2, <u>A99.4</u> , A195.4, A195.5, A195.6, B61.1, C1.2, D29.4, D82.3, D82.4, E193.1, E193.3, E193.6, I296.3, K40.2

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Process 2: INORGANIC CHEMICAL STORAGE					
System 1: AMMONIA STORAGE TANKS					
STORAGE TANK, FIXED ROOF, #1, 28% AQUEOUS AMMONIA, 16,000 <u>16,900</u> GALS, DIAMETER: 10 FT; LENGTH: 26 FT A/N: 439497 <u>480152</u> Permit to Construct Issued: 08/05/05 <u>10/16/08</u>	D7				E144.1, C157.1, E193-1, E193.3,
STORAGE TANK, FIXED ROOF, #2, 28% AQUEOUS AMMONIA, 16,000 <u>16,900</u> GALS, DIAMETER: 10 FT; LENGTH: 26 FT A/N: 439498 <u>480153</u> Permit to Construct Issued: 08/05/05 <u>10/16/08</u>	D8				E144.1, C157.1, E193-1, E193.3,

ATTACHMENT 2

LIST OF PROPERTY OWNERS AND TENANTS

Datatronics Inc.
APN: 331-180-002 & 012
28151 Highway 74
Romoland, CA 92585

Riverside County Transportation
Commission
APN: 331-180-004; 329-141-006
P.O. Box 12008
Riverside, CA 92502

Property Owner
APN: 331-180-006, 14 & 15
P.O. Box 1239
Vista, CA 92085

Walter A. and Irene S. Reggio
APN: 331-180-007
1049 Obispo Ave.
Long Beach, CA 90804

Southern California Edison Co.
APN: 331-180-016; 331-150-31
P.O. Box 800
Rosemead, CA 91770

Jan French
APN: 331-170-017
P.O. Box 1205
Romoland, CA 92585

William A. Allen
APN: 331-170-018
11281 Del Diablo Way
San Diego, CA 92129

Property Owner or Residence
APN: 331-170-025
23411 Western Ridge
Moreno Valley, CA 92557

Ashby Financial Co. Inc.
APN: 331-170-026, 027
470 E. Harrison St.
Corona, CA 92879

Property Owner or Residence
APN: 331-200-012, 13
29482 Vista Valley Dr.
Vista, CA 92084

James and B. Marlene Nadir
APN: 331-200-018, 019 & 020
3011 S. Hacienda Blvd.
Hacienda Heights, CA 91745

Property Owner
APN: 331-200-022, 23, 24
7951 Arlington Ave.
Riverside, CA 92503

Property Owner
APN: 331-200-022, 23, 24
7951 Arlington Ave.
Riverside, CA 92503

Romoland 64
APN: 331-210-008
41391 Kalmia St., Suite 200
Murrieta, CA 92562

Property Owner
APN: 331-210-009, 331-190-
046
512 Chaney St.
Lake Elsinore, CA 92530

Property Owner
APN: 331-210-012
132 Glynbrook St. No. 350
Keitzer, OR 97303

Property Owner
APN: 331-210-019,020,021
1525 Grand Ave.
San Marcos, CA 92078

Property Owner or Residence
APN: 331-210-023
26555 Palomar Rd.
Romoland, CA 92585

John and Terry V. Torres
APN: 331-210-025
20590 Magnolia Ave.
Nuevo, CA 92567

Eastern Municipal Water District
APN: 329-141-005
P.O. Box 8300
Perris, CA 92572

Sharon K. Fields
APN: 329-142-007
27888 Van Buren Ave.
Romoland, CA 92585

Martin Aguirre
APN: 329-142-008
27894 Van Buren Ave.
Romoland, CA 92585

Property Owner or Residence
APN: 329-142-009
27912 Ethanac Rd.
Romoland, CA 92585

Hoyt J. and Oma L. Bibby
APN: 329-143-004
27865 Van Buren Ave.
Romoland, CA 92585

Property Owner APN: 329-120-016, 17, 18 P.O. Box 1180 Riverside, CA 92502	Property Owner APN: 329-132-029 27924 Highway 74 Romoland, CA 92585	Riverside County Transportation Commission APN: 331-190-006 P.O. Box 12008 Riverside, CA 92502
Property Owner APN: 331-190-010, 011, 014, 17, 41, 47 1351 S Campus Ave. Ontario, CA 91761	Property Owner APN: 331-190-031 26035 Palomar Rd. Sun City, CA 92585	Property Owner APN: 331-190-033, 34 4241 S Arville St. Las Vegas, NV 89103
Property Owner APN: 331-190-039 P.O. Box 1207 Richmond, TX 77406	Acz, LLC APN: 331-190-043 2520 Cactus Rd. San Diego, CA 92154	Icenogle Machine Inc. APN: 331-190-044 P.O. Box 249 Winchester, CA 92596
Property Owner APN: 331-190-039 P.O. Box 1207 Richmond, TX 77406	Acz, LLC APN: 331-190-043 2520 Cactus Rd. San Diego, CA 92154	Icenogle Machine Inc. APN: 331-190-044 P.O. Box 249 Winchester, CA 92596
Property Owner APN: 331-190-045 P.O. Box 1179 Romoland, CA 92585	Thomas and Susan M. Maulhardt APN: 329-110-006 3820 Goldenrod St. Seal Beach, CA 90740	Property Owner APN: 329-110-022 2625 Dean Ct. Pinole, CA 94564
Property Owner APN: 329-110-023 445 S D ST Perris, CA 92570	Property Owner APN: 331-150-003 27789 Ethanac Rd. Romoland, CA 92585	Eddie and Pearl Roussell APN: 331-150-004 50694 Highway 31 La Pine, OR 97739
Property Owner APN: 331-150-005, 013 1757 Tapo Canyon Rd. SVW88 Simi Valley, CA 93063	Duane L. and Sandra D. Walston APN: 331-150-016 P.O. Box 264 Hemet, CA 92546	Paul E. and Delores C. Phillips APN: 331-150-017 28797 Belmont Ct. Sun City, CA 92586
Property Owner APN: 331-150-018, 027 5501 Saint Andrews Ct. Plano, TX 75093	Julian and Clementina Rubalcava APN: 331-150-024 4004 Lago Di Grata San Diego, CA 92130	Property Owner APN: 331-150-025 26450 Dawson Rd. Romoland, CA 92585
Property Owner APN: 331-150-029 23498 Underwood Circle Murietta, CA 92562	Property Owner APN: 331-150-031 14799 Chestnut St. Westminster, CA 92683	Property Owner APN: 331-150-033 P O BOX 890700 Temecula, CA 92589

Kiewit Construction Company APN: 331-150-036 1000 Kiewit Plaza Omaha, CA 68131	John and Evelyn Motte APN: 331-150-037 445 S. D St. Perris, CA 92570	Property Owner APN: 331-150-039 14141 William Rd. Blythe, CA 92225
Michael J. and Anne M. Grabowski APN: 331-150-040 12018 Central Ave. Chino, CA 91710	Donald D. and Jacquelyn E. Brinley APN: 329-263-012 25932 Westwinds Dr. Romoland, CA 92585	Maria Andrade APN: 329-263-013 25946 Westwinds Dr. Romoland, CA 92585
Property Owner or Residence APN: 329-263-014 25962 Westwinds Dr. Romoland, CA 92585	Property Owner or Residence APN: 329-263-015 25961 Tradewinds Dr. Romoland, CA 92585	Property Owner or Residence APN: 329-263-016 25943 TRADE WINDS DR Romoland, CA 92585
Property Owner or Residence APN: 329-263-017 25927 Tradewinds Dr. Romoland, CA 92585	Clark E. and Norma J. Demuth APN: 329-262-012 25934 Northwinds Dr. Romoland, CA 92585	Property Owner or Residence APN: 329-262-013 25942 Northwinds Dr. Romoland, CA 92585
Property Owner or Residence APN: 329-262-014 25964 Northwinds Dr. Sun City, CA 92585	Kenneth Eugene Flint APN: 329-262-015 25963 Westwinds Dr. Romoland, CA 92585	Robert L. and Anna L. Smith APN: 329-262-016 25945 Westwinds Dr. Romoland, CA 92585
Property Owner or Residence APN: 329-262-017 25929 Westwinds Dr. Romoland, CA 92585	Raul and Virginia Riestra APN: 329-261-001 28235 Springwinds Dr. Romoland, CA 92585	Bradley John Allanach APN: 329-261-002 28205 Springwinds Dr. Romoland, CA 92585
Property Owner or Residence APN: 329-261-003 28205 Springwinds Dr. Romoland, CA 92585	Isreal Grijalva Menendez & Josefina Grijalva APN: 329-261-004 28191 Springwinds Dr. Romoland, CA 92585	Property Owner or Residence APN: 329-261-005 28175 Springwinds Dr. Romoland, CA 92585
Property Owner or Residence APN: 329-261-006 14863 Artisan St. Moreno Valley, CA 92555	Manuela M. Nila APN: 329-261-007 28135 Springwinds Dr. Romoland, CA 92585	Property Owner or Residence APN: 329-261-008 13716 Bighorn Trail Willis, TX 77378
Jose and Dolores Ochoa APN: 329-261-009 25965 Northwinds Dr. Romoland, CA 92585	Mayra C. Velzaco Hasan APN: 329-261-010 25941 Northwinds Dr. Romoland, CA 92585	Property Owner or Residence APN: 329-261-011 25933 Northwinds Dr. Romoland, CA 92585

Property Owner
APN: 329-141-003, 008
5501 Saint Andrews Ct.
Plano, TX 75093

Property Owner or Residence
APN: 331-150-002; 331-150-022
27775 Ethanac Rd.
Sun City, CA 92858