

# RICE SOLAR ENERGY, LLC

An Affiliate of SOLARRESERVE

## DOCKET

09-AFC-10

DATE MAR 16 2010

RECD. MAR 26 2010

March 16, 2010

Sam Oktay  
Lead Air Quality Engineer  
Mojave Desert Air Quality Management District  
14306 Park Avenue  
Victorville, CA 92392-2310

Subject: Additional Authority to Construct Applications for the Rice Solar Energy Project

Dear Mr. Oktay:

Per your request, Rice Solar Energy LLC has prepared the attached "Application for Authority to Construct General Form" for the salt commissioning sources:

- Multi-stage wet chemical scrubber proposed for use during the salt system commissioning; and
- Material handling equipment associated with the salt system commissioning with the fabric filter baghouse proposed for the control of the emissions from the salt milling and handling processes.

A check for \$452 has also been included to cover the application fee. These forms are being submitted to supplement the application forms originally submitted for the Rice Solar Energy Project (RSEP).

As discussed in Section 5.1.4 of the RSEP Application for Certification (AFC), a multi-stage wet chemical scrubber will be installed to remove the NO<sub>x</sub> emissions emitted from the salt melting/heating systems and the hot salt storage tank during the salt system commissioning period. The scrubber will be used 24 hours per day, 7 days per week throughout the salt system commissioning period. Because the final make and model of the scrubber have not been determined at this time, Rice Solar Energy LLP would be willing to accept a permit condition that requires the reporting of the make, model, and serial number to the MDAQMD 60 days prior to the installation of the equipment. At the completion of the salt system commissioning, the scrubber and all salt melting/heating systems will be removed from the site.

The hourly, daily, and annual emission estimates associated with the scrubber are provided in Table 1. The conditioning emission estimate is a conservative estimate based on the maximum guarantee level of impurity (chiefly magnesium nitrate) concentrations in the salt and not the typical or expected impurity concentration. Furthermore, the scrubber NO<sub>x</sub> control level was assumed to be 85 percent effective in reducing NO<sub>x</sub> emissions, and the RSEP project expects the control efficiency to be above 90 percent. The information is excerpted from Table 5.1-12 of the RSEP AFC. The detailed emission calculations are also available in RSEP AFC Volume II, Table 5.1B-3 (attached for your reference).

**TABLE 1 (REFERENCE TABLE 5.1-12 OF THE AFC)**  
RSEP Salt System Commissioning Scrubber Emission Rates

	NO <sub>x</sub>	CO	VOC	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Maximum hourly, lb/hr</b>						
Conditioning*	10.9	—	—	—	—	—
<b>Maximum daily, lb/day</b>						
Conditioning*	261	—	—	—	—	—
<b>Salt system commissioning period, lb/period</b>						
Conditioning*	17,901	—	—	—	—	—

\*Conditioning emissions represent post-control emissions.

lb/hr = pound(s) per hour

lb/period = pound(s) per duration of the commissioning activities

The salt milling, blending, and handling activities will take place within a temporary enclosure and the emissions will be collected and exhausted through a fabric filter baghouse unit. The salt will be conveyed from the blended storage hopper to the salt-melting operation via an enclosed mechanical screw conveyor (or other similar conveyor). There are no plans at this time to convey the salt pneumatically. The salt will drop into the melting system, where the drop height will be minimized to reduce salt loss. Additionally, the drop point will include a snorkel to reduce the salt drop height and fugitive dust emissions will be controlled by implementing a housekeeping program to minimize the collection of salt on the floor of the enclosure. The salt handling activities will take place up to 24 hours per day, 7 days per week throughout the 70 day salt melting period. Because the final make and model of the milling and handling equipment have not been determined at this time, Rice Solar Energy LLP would be willing to accept a determination of compliance condition that will require the reporting of the final design details to the MDAQMD 90 days prior to the installation of the equipment. All salt milling and handling equipment will be removed from the site at the completion of the salt system commissioning.

The specific emission factors for estimating the fugitive dust emissions from the milling, handling, and conveying of sodium nitrate and potassium nitrate salts are unavailable in general reference materials such as AP-42. However, in order to provide an order of magnitude estimate of emissions, the AP-42 approach (EPA, 1995) for estimating phosphate rock emissions was used as a surrogate. Phosphate rock was selected as a surrogate because all three compounds are common materials used in fertilizers and the phosphate grinding would represent a conservative estimate because the rock-grinding emissions are expected to be higher than the milling activities used to break up salt clumps. It is expected that the fabric filter baghouse unit will achieve control efficiency greater than 99 percent.

The hourly, daily, and annual total particulate emission estimates associated with the salt milling and material handling emissions are provided in Table 2, and show less than 151 pounds of total particulate, conservatively assumed to be both 100 percent PM<sub>10</sub> and PM<sub>2.5</sub>, would be released inside the enclosure during the 70 day salt handling period. The hourly and daily emission rates assume the total particulate emissions would be emitted over 70, 8-hour work days.

Sam Oktay  
Page 3  
March 15, 2010

**TABLE 2 (REFERENCE ATTACHMENT DR8-1 OF THE CEC DATA REQUEST RESPONSES)**  
**RSEP Salt Milling and Material Handling Emission Rates**

	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub><sup>a</sup></b>	<b>PM<sub>2.5</sub><sup>a</sup></b>
Maximum hourly, lb/hr <sup>b</sup>	-	-	-	-	0.27	0.27
Maximum daily, lb/day <sup>c</sup>	-	-	-	-	2.2	2.2
Salt system commissioning period, lb/period <sup>d</sup>	-	-	-	-	151	151

<sup>a</sup>Conservatively assumes the PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be equivalent to the total post-control particulate emissions.

<sup>b</sup>The maximum hourly emission rate is based on the total particulate period emissions divided by 70, 8-hour work days.

<sup>c</sup>The maximum daily emission rate is based on the total particulate period emission divided by 70 work days.

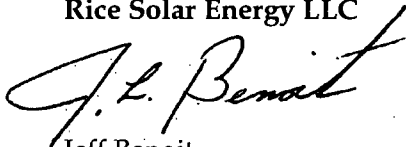
<sup>d</sup>The maximum period emission rate is based on the phosphate rock grinding estimates for 35,000 tons of salt material (see Attachment DR8-1).

lb/hr = pound(s) per hour

lb/period = pound(s) per duration of the commissioning activities

If you have any questions regarding this information, please contact me at (310) 315-2212, Jerry Salamy (CH2M HILL) at (916) 286-0207, or Keith McGregor (CH2M HILL) at (916) 286-0221.

Sincerely,  
Rice Solar Energy LLC



Jeff Benoit  
Rice Solar Energy Project Director

Attachment

c: CEC Docket List  
CH2MHILL Project File

**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**

14306 Park Avenue, Victorville, CA 92392-2310  
(760) 245-1661 Facsimile: (760) 245-2022

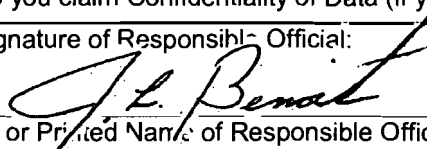
www.mdaqmd.ca.gov

**Eldon Heaston**  
Executive Director

**APPLICATION FOR AUTHORITY TO CONSTRUCT AND PERMIT TO OPERATE**

Page 1 of 2: please type or print

REMIT \$226.00 WITH THIS DOCUMENT (\$129.00 FOR CHANGE OF OWNER)

1. Permit To Be Issued To (company name to receive permit): <b>Rice Solar Energy, LLC.</b>		1a. Federal Tax ID No.: <b>27-0967061</b>																	
2. Mailing/Billing Address (for above company name): <b>2425 Olympic Blvd., Suite 500 East, Santa Monica, CA 90404</b>																			
3. Facility or Business License Name (for equipment location): <b>Rice Solar Energy, LLC.</b>																			
4. Facility Address - Location of Equipment (if same as for company, enter "Same"): <b>Rural Address: Rice, CA</b>		Location UTM or Lat/Long: <b>Reference AFC</b>																	
5. Contact Name/Title: <b>Jeff Benoit / SR. Project Manager</b>		Email Address: <b>Jeff.Benoit@SolarReserve.com</b>	Phone/Fax Nos.:																
6. Application is hereby made for Authority To Construct (ATC) and Permit To Operate (PTO) the following equipment: <b>Dry Salt Milling / Blending / Handling (Temporary - Salt Commissioning Only)</b>																			
Air Pollution Control Equipment, if any (note that most APCE require a separate application): <b>Fabric Filter Baghouse</b>																			
7. Application is for: <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> Modification* <input type="checkbox"/> Change of Owner*		For modification or change of owner: *Current Permit Number: _____																	
8. Type of Organization (check one): <input type="checkbox"/> Individual Owner <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Utility <input type="checkbox"/> Local Agency <input type="checkbox"/> State Agency <input type="checkbox"/> Federal Agency																			
9. General Nature of Business: <b>Solar Powered Electrical Generating Facility</b>		Principal Product: <b>Electricity</b>	SIC Code (if known):																
10. Distances (feet and direction to closest): <b>N A</b> Fenceline <b>7 9 2 0 0 N E</b> Residence <b>8 9 7 6 0 W</b> Business <b>1 2 1 4 4 0 E</b> School																			
11. Facility Annual Throughput by Quarters (percent): <table border="0"><tr><td><b>2 5</b> %</td><td><b>2 5</b> %</td><td><b>2 5</b> %</td><td><b>2 5</b> %</td></tr><tr><td>Jan-Mar</td><td>Apr-Jun</td><td>Jul-Sep</td><td>Oct-Dec</td></tr></table>		<b>2 5</b> %	<b>2 5</b> %	<b>2 5</b> %	<b>2 5</b> %	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	12. Expected Facility Operating Hours: <table border="0"><tr><td><b>2 4</b></td><td><b>7</b></td><td><b>5 2</b></td><td><b>8 7 6 0</b></td></tr><tr><td>Hrs/Day</td><td>Days/Wk</td><td>Wks/Yr</td><td>Total Hrs/Yr</td></tr></table>		<b>2 4</b>	<b>7</b>	<b>5 2</b>	<b>8 7 6 0</b>	Hrs/Day	Days/Wk	Wks/Yr	Total Hrs/Yr
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13. Do you claim Confidentiality of Data (if yes, state nature of data on reverse in Remarks)?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																
14. Signature of Responsible Official: 		Official Title: <b>Sr. Project Manager</b>																	
Typed or Printed Name of Responsible Official: <b>Jeff Benoit</b>		Phone Number: <b>( 3 1 0 ) 3 1 5 - 2 2 1 2</b>	Date Signed:																
- For District Use Only -																			
Application Number:	Invoice Number:	Permit Number:	Company/Facility Number:																

# MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

## GENERAL APPLICATION, continued

Page 2 of 2: please type or print

### 15. Stack Emissions Information:

<u>Stack No.</u>	<u>Stack Height</u>	<u>Stack Diameter</u>	<u>Exhaust Temp</u>	<u>Exhaust Flow Rate</u>	<u>Exhaust Velocity</u>
1*	TBD	TBD	TBD	TBD	TBD
2					
3					

\*Fabric Filter Baghouse details will be provided prior to start of construction (see discussion below).

(list additional stacks on a separate sheet)

Stack Height is the distance above ground level to discharge point (feet)

Stack Diameter is the diameter (or equivalent circular diameter) of discharge point (nearest tenth foot)

If using cross-sectional area (A in square feet), equivalent diameter is  $D = (1.273A)^{0.5}$

Exhaust Temp in degrees F, actual or estimated to nearest 50 deg F

Exhaust Flow Rate at discharge point in actual cubic feet per minute (ACFM)

Exhaust Velocity in feet per second, design or measured

### 16. Remarks (basis for confidentiality of data, process description, modification description, etc.):

The salt milling, blending, and handling activities will take place within a temporary enclosure and the emissions will be collected and exhausted through a fabric filter baghouse unit. The salt will be conveyed from the blended storage hopper to the salt-melting operation via an enclosed mechanical screw conveyor (or other similar conveyor). There are no plans at this time to convey the salt pneumatically. The salt will drop into the melting system, where the drop height will be minimized to reduce salt loss. Additionally, the drop point will include a snorkel to reduce the salt drop height and fugitive dust emissions will be controlled by implementing a housekeeping program to minimize the collection of salt on the floor of the enclosure. The salt handling activities will take place up to 24 hours per day, 7 days per week throughout the 70 day salt melting period. It is expected that the fabric filter baghouse unit will achieve control efficiency greater than 99 percent.

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Based on the phosphate rock grinding estimates, less than 151 pounds of total particulate would be released inside the enclosure during the 70 day salt handling period. Assuming the milling and handling emissions would be emitted over 70, 8-hour work days, the hourly and daily emission rates would be 0.27 lb/hr and 2.2 lb/day.

If you wish to specify process information as proprietary or confidential, space is provided for this purpose.  
The kinds and rates of emissions may not be held confidential; emissions are subject to public disclosure.

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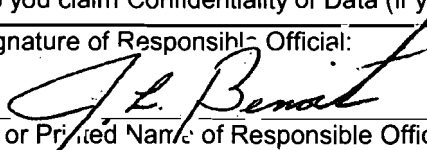
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Air Pollution Control Equipment, if any (note that most APCE require a separate application): <b>See Sections 5.1.4.1.1 of the AFC</b>																			
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**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT  
GENERAL APPLICATION, continued**

Page 2 of 2: please type or print

**15. Stack Emissions Information:**

<u>Stack No.</u>	<u>Stack Height</u>	<u>Stack Diameter</u>	<u>Exhaust Temp</u>	<u>Exhaust Flow Rate</u>	<u>Exhaust Velocity</u>
STACK3*	50 feet	1.13 feet	120 degrees F	3,000 acfm	50 feet/second
2					
3					

\*STACK3 corresponds to the stack numbering convention used for the AFC dispersion modeling files.

(list additional stacks on a separate sheet)

Stack Height is the distance above ground level to discharge point (feet)

Stack Diameter is the diameter (or equivalent circular diameter) of discharge point (nearest tenth foot)

If using cross-sectional area (A in square feet), equivalent diameter is  $D = (1.273A)^{0.5}$

Exhaust Temp in degrees F, actual or estimated to nearest 50 deg F

Exhaust Flow Rate at discharge point in actual cubic feet per minute (ACFM)

Exhaust Velocity in feet per second, design or measured

**16. Remarks (basis for confidentiality of data, process description, modification description, etc.):**

If you wish to specify process information as proprietary or confidential, space is provided for this purpose.  
The kinds and rates of emissions may not be held confidential; emissions are subject to public disclosure.

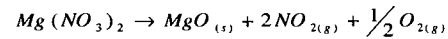
Table 5.1B-3

**Rice Solar Energy Project - Solar Salt Commissioning**  
**Solar Salt Conditioning - Off-Gas Emission Characterization**  
**October 2009**

**Solar Salt Purification - Decomposition of Impurities (Short-Term - Non-Recurring)**

**Descriptions:**

Because the salts contain a fractional amount of magnesium nitrate as an impurity, conditioning the salt to 1,100 F will oxidize the magnesium nitrate (Mg(NO<sub>3</sub>)<sub>2</sub>) to magnesium oxide (MgO) and release oxides of nitrogen (NO & NO<sub>2</sub>).



Total salt amount:	35,000 Short Tons (Maximum)
Max % (wt) Mg:	0.045 % (based on vendor guarantee)
Max % (wt) Mg(NO <sub>3</sub> ) <sub>2</sub> :	0.275
Total mass of Mg(NO <sub>3</sub> ) <sub>2</sub> :	192,162 lb (maximum guarantee)
MWt of Mg:	24.31 lb/lb-mole
MWt of Mg(NO <sub>3</sub> ) <sub>2</sub> :	148.30 lb/lb-mole
MWt of NO <sub>2</sub> :	46.05 lb/lb-mole
Max NO <sub>2</sub> Emissions:	119,340 lbs - Lifetime estimate (Emission higher initially then tail off)
Salt curing duration:	69 24-hour days
NO <sub>2</sub> release rate:	72.5 lb/hr (pre-control)
NO <sub>2</sub> control efficiency:	85% (4-stage packed bed chemical scrubber will exceed this requirement)

**NO<sub>2</sub> Release Rate (Calculated based on maximum salt melting rate & Ideal gas law)**

Molecular Wt of NO <sub>2</sub> :	46.02 lb/lb-mole
NO <sub>2</sub> gas pressure:	14.7 psi
NO <sub>2</sub> gas temperature:	1210 R (750 F)
Universal gas constant:	10.73159 ft <sup>3</sup> -psi/R/lb-mole
Max. NO <sub>2</sub> release rate:	1,391.66 ft <sup>3</sup> /hr

**Emission Source Data (Based on wet chemical scrubbing technology)**

Stack Id:	Stack 3	Units (Descriptions)
Stack height:	50	ft above ground
Stack location:	STK 3	
Stack diameter:	14	in.
Est. Exhaust temperature:	120	*F
Exhaust flowrate:	3,000	ACFM

**Emissions (Based on control equipment performing at above stated efficiency)**

Criteria Pollutants	Max. NO <sub>x</sub> Emissions	Units (Comments)
Max Hourly Pre-Control:	72.55	lb/hr
Max Hourly Post-Control:	10.88	lb/hr
Lifetime Pre-Control:	119,340	lb
Lifetime Post-Control:	17,901	lb

**Energy Requirement for Salt Purification (Assumed electrical heating in Hot Tank)**

Eutectic salt specific heat:	0.363 BTU/lb
Energy to raise salt temp:	199.7 BTU/lb (0.363 BTU/lb-F) Additional
Total energy requirement:	13,976 mmBTU
Total electrical load:	4,836 MWh (Assume 85% heat transfer efficiency)
Hot tank heating element:	3.0 MWe
Length of curing:	1,612 hours or 67 days

	Emission Factors (lb/MWh)	Total Process Emissions (metric tons)
Indirect Greenhouse Gases		
CO <sub>2</sub> :	724.12	1,588
CH <sub>4</sub> :	0.0302	0.07
N <sub>2</sub> O:	0.0081	0.02

Greenhouse gas emission factors from the California Climate Action Registry, General Reporting Protocol v. 3.1, January 2005

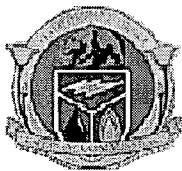


**Attachment DR8-1****Rice Solar Energy Project****Emission Estimates Associated with Salt Milling Activities During the Salt Commissioning Process****March 2010**

Note: Emission factors for milling magnesium and sodium nitrate were not readily available. Therefore, phosphate rock processing was used to develop a conservative estimate of emissions from the salt milling activities.

	Quantity of Salt Material Milled		Emission Factor *	Total PM Emissions	
	(pounds)	(tons)	lb/ton	(pounds)	(tons)
<b>Uncontrolled</b>	70,000,000	35,000	1.50	52500	26.3
<b>Controlled</b>	70,000,000	35,000	0.0043	150.5	0.075

\*Reference: Emission rate is based on the emission factors for phosphate rock grinding (AP-42, Table 11.21-4).



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 *RICE SOLAR ENERGY POWER  
PLANT PROJECT***

**Docket No. 09-AFC-10**

***PROOF OF SERVICE***  
**(Revised 3/4/2010)**

**APPLICANT**

Jeffrey Benoit  
Project Manager  
Solar Reserve  
2425 Olympic Boulevard, Ste. 500 East  
Santa Monica, CA 90404  
Jeffrey.Benoit@solarreserve.com

**APPLICANT'S CONSULTANTS**

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Grenier and Associates  
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CH2MHILL  
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Sacramento, CA 95833  
ddavy@ch2m.com

**COUNSEL FOR APPLICANT**

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Sacramento, CA 95814  
sgalati@gb-llp.com

**INTERESTED AGENCIES**

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Allison Shaffer  
Bureau of Land Management  
Palm Springs/South Coast Field Office  
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Palm Springs, Ca 92262  
allison\_shaffer@blm.gov

**INTERVENORS**

**ENERGY COMMISSION**

**\*ROBERT WEISENMILLER**  
Commissioner and Presiding Member  
rweisenm@energy.state.ca.us

**\*KAREN DOUGLAS**

Chairman and Associate Member  
kldougla@energy.state.ca.us

Kourtney Vaccaro  
Hearing Officer  
kvaccaro@energy.state.ca.us

John Kessler  
Siting Project Manager  
jkessler@energy.state.ca.us

Deborah Dyer  
Staff Counsel  
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**\*Jennifer Jennings**  
Public Adviser's Office  
publicadviser@energy.state.ca.us