



April 1, 2010

Jack Caswell  
Manager, Compliance Office  
Siting, Transmission and Environmental Protection Division  
California Energy Commission  
1516 Ninth Street, MS-2000  
Sacramento, CA 95814

**Re: NextEra Energy Resources  
Blythe Energy, LLC  
Blythe Energy Center (99-AFC-8C)  
Installation of CO Catalyst**

Dear Mr. Caswell:

The purpose of this letter is to inform the Energy Commission about the status of our proposed CO catalyst installation at NextEra Energy Resources' Blythe Energy Center, located in Blythe, California, in Riverside County.

Information regarding this proposed installation was previously communicated to Steve Munro in a letter dated November 30, 2009. Our communication with Steve Munro is consistent with the Mojave Desert Air Quality Management District's (MDAQMD) perspective that the addition of the CO catalysts is simply an administrative change and does not trigger New Source Review (NSR) requirements. The Environmental Protection Agency (EPA) has also concurred with this assessment. A letter from Gerardo Rios dated January 12, 2010 to this effect is attached.

We submitted the Authority to Construct and Title V Administrative Modification application to the MDAQMD on March 22, 2010. We are requesting concurrence that no further action is needed with the Energy Commission for this administrative action.

Mr. Jack Caswell, April 1, 2010  
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I would be pleased to discuss this project with you further should you have any questions. My contact information is provided below.

Sincerely,



Richard Piper  
Environmental Manager  
NextEra Energy Resources  
[rich.piper@nexteraenergy.com](mailto:rich.piper@nexteraenergy.com)  
Office: (561) 691-7058  
Cell: (561) 301-5621

Attachment: EPA Letter

cc:

Brian Mellon	Blythe Energy, LLC Plant General Manager
John Goodwin	Blythe Energy, LLC Business Manager
Charlyn Mosley	Blythe Energy, LLC, Environmental Specialist
Sara Head	Vice President, AECOM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

January 12, 2010

Richard Piper, Environmental Manager  
NextEra Energy Resources  
700 Universe Blvd.,  
Juno Beach, FL 33408

**Re: Installation of Carbon Monoxide (CO) Catalyst at Blythe Energy Center (BEC)**

Dear Mr. Piper,

Thank you for the opportunity to comment on NextEra Energy Resources' (NER) proposed installation of a CO catalyst at BEC in Blythe, CA. Blythe Energy Center was issued Prevention of Significant Deterioration (PSD) Permit SE 00-01 in March 2001 and modification SE 03-01 in November 2004 by USEPA Region 9.

As stated in NER's letter, the Ambient Air Quality Impacts Report (AAQIR) for SE 03-01 noted that if BEC could not comply with a CO emission limit of 4 ppmvd, the installation of oxidation catalysts would be required. With the addition of this control technology, NER has stated that BEC will be able to maintain compliance with all conditions and emission limits in SE 03-01. After reviewing SE 03-01 and the supporting AAQIR, along with the proposed installation of the oxidation catalyst at BEC, we have determined that installation of this control technology will not require a modification of the existing permit. As a result, NER may begin installation of this equipment in order to comply with existing permit conditions under BEC's new power purchase agreement.

We request that NER submit two separate documents to the Air Permits office at USEPA Region 9 regarding this action: a letter verifying installation of the oxidation catalyst has been completed, and continuous emissions monitoring data during normal operations that demonstrates compliance with the CO emission limit of 4 ppmvd within 180 days of installation. Please contact me (415) 972-3974 or Omer Shalev of my office at (415) 972-3538 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerardo C. Rios".

Gerardo C. Rios  
Chief, Permits Office