

RICE SOLAR ENERGY, LLC

An Affiliate of SOLARRESERVE

DOCKET

09-AFC-10

DATE APR 21 2010

RECD. APR 21 2010

April 21, 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

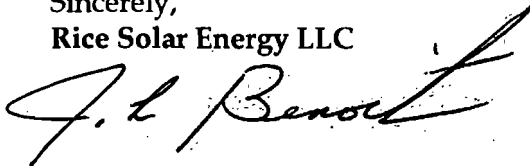
Dear Mr. Oktay:

Per your email request dated April 20, 2010, Rice Solar Energy LLC has prepared the attached "Application for Authority to Construct General Form" for the salt commissioning fabric filter baghouse associated with the salt milling and handling process.

A check for \$226 has also been included to cover the application fee. This form is being submitted to supplement the application forms originally submitted for the Rice Solar Energy Project (RSEP).

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

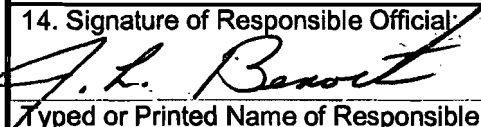
Eldon Heaston

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): Rice Solar Energy, LLC.		1a. Federal Tax ID No.: 27-0967061																	
2. Mailing/Billing Address (for above company name): 2425 Olympic Blvd., Suite 500 East, Santa Monica, CA 90404																			
3. Facility or Business License Name (for equipment location): Rice Solar Energy, LLC.																			
4. Facility Address - Location of Equipment (if same as for company, enter "Same"): Rural Address: Rice, CA		Location UTM or Lat/Long: Reference AFC																	
5. Contact Name/Title: Jeff Benoit / SR. Project Manager		Email Address: Jeff.Benoit@SolarReserve.com	Phone/Fax Nos.:																
6. Application is hereby made for Authority To Construct (ATC) and Permit To Operate (PTO) the following equipment: Fabric Filter Baghouse (Salt Commissioning Only)																			
Air Pollution Control Equipment, if any (note that most APCE require a separate application):																			
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: Solar Powered Electrical Generating Facility		Principal Product: Electricity	SIC Code (if known):																
10. Distances (feet and direction to closest): N A Fenceline 7 9 2 0 0 N E Residence 8 9 7 6 0 W Business 1 2 1 4 4 0 E School																			
11. Facility Annual Throughput by Quarters (percent): <table border="0"><tr><td>2 5 %</td><td>2 5 %</td><td>2 5 %</td><td>2 5 %</td></tr><tr><td>Jan-Mar</td><td>Apr-Jun</td><td>Jul-Sep</td><td>Oct-Dec</td></tr></table>		2 5 %	2 5 %	2 5 %	2 5 %	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	12. Expected Facility Operating Hours: <table border="0"><tr><td>2 4</td><td>7</td><td>1 0</td><td>1 6 8 0</td></tr><tr><td>Hrs/Day</td><td>Days/Wk</td><td>Wks/Yr</td><td>Total Hrs/Yr</td></tr></table>		2 4	7	1 0	1 6 8 0	Hrs/Day	Days/Wk	Wks/Yr	Total Hrs/Yr
2 5 %	2 5 %	2 5 %	2 5 %																
Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec																
2 4	7	1 0	1 6 8 0																
Hrs/Day	Days/Wk	Wks/Yr	Total Hrs/Yr																
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: Sr. Project Manager																	
Typed or Printed Name of Responsible Official: Jeff Benoit		Phone Number: (310) 315 - 2212	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.

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.

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.

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.



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
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Santa Monica, CA 90404
Jeffrey.Benoit@solarreserve.com

APPLICANT'S CONSULTANTS

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COUNSEL FOR APPLICANT

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INTERVENORS

ENERGY COMMISSION

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***Jennifer Jennings**
Public Adviser's Office
publicadviser@energy.state.ca.us

DECLARATION OF SERVICE

I, Mary Finn, declare that on April 21, 2010, I served and filed copies of the attached, 09-AFC-10-RSEP MDAQMD Additional Application. 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: [http://www.energy.ca.gov/sitingcases/ricesolar].

The documents have 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

☐ by delivering on this date for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for the mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date 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

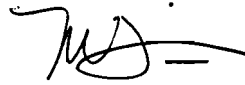
Attn: Docket No. 09-AFC-10

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

docket@energy.state.ca.us

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



Mary Finn