

DOCKET

08-AFC-8

DATE AUG 30 2010

RECD. AUG 30 2010

August 2010

**RESPONSE TO ENVIRONMENTAL PROTECTION
AGENCY QUESTION ON

PREVENTION OF SIGNIFICANT DETERIORATION
PERMIT APPLICATION**

REVISED APPLICATION FOR CERTIFICATION

(08-AFC-8)

FOR HYDROGEN ENERGY CALIFORNIA

KERN COUNTY, CALIFORNIA

Prepared by



**URS CORPORATION
1615 Murray Canyon Road, Suite 1000
San Diego, CA, 92108
URS Project Number 28067571**

Acronyms

COS	carbonyl sulfide
H ₂ S	hydrogen sulfide
PDOC	Preliminary Determination of Compliance
SJVAPCD	San Joaquin Valley Air Pollution Control District
TPY	tons per year
TRS	total reduced sulfur
U.S. EPA	U.S. Environmental Protection Agency

COMMENT

- 1. In the total annual summary that was updated in Table 1 of the Applicant’s “Response to the April 12, 2010 CEC Data Response and Issues Resolution Workshop Request No. 40”, the emission rate of hydrogen sulfide (H₂S) is listed as 3.7 tons per year (tpy). In the San Joaquin Valley Air Pollution Control District’s (SJVAPCD’s) Preliminary Determination of Compliance (PDOC), the emission rate for carbonyl sulfide (COS) is listed at 9.9 tpy. Please provide a demonstration that the total emission rate of total reduced sulfur (TRS) compounds (e.g., COS, H₂S) is below the 10 tpy non-criteria pollutant threshold.***

RESPONSE

The 10 tpy non-criteria pollutant threshold for major sources has not been exceeded. Table 1-1 demonstrates that the emissions of TRS from the HECA Project are below the major-source threshold.

**Table 1-1
 Comparison of HECA Project Emissions of Total Reduced Sulfur (TRS) to Threshold**

Hazardous Air Pollutant	HECA Project Emission Rate (tpy)	Weight Ratio of Reduced Sulfur (H₂S) to Weight of Pollutant	HECA Project Emission Rate as TRS (tpy)	Major Source Regulatory Threshold for TRS (tpy)	Is Threshold Exceeded?
Hydrogen Sulfide (H ₂ S)	3.7	1	3.7	Not Applicable	No
Carbonyl Sulfide (COS)	9.9	0.57	5.6	Not Applicable	No
TRS			9.3	10.0	No



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 *HYDROGEN ENERGY*
CALIFORNIA PROJECT

Docket No. 08-AFC-8

PROOF OF SERVICE LIST
(Rev. 6/22/10)

APPLICANT

Gregory D. Skannal
Tiffany Rau
Rick Harrison
Hydrogen Energy International LLC
One World Trade Center, Suite 1600
Long Beach, CA 90831
gregory.skannal@hydrogenenergy.com
tiffany.rau@hydrogenenergy.com
rick.harrison@hydrogenenergy.com

Asteghik Khajetoorians,
Senior BP Legal Attorney
BP America, Inc.
6 Centerpointe Drive, LPR 6-550
La Palma, CA 90623
Asteghik.Khajetoorians@bp.com

APPLICANT'S CONSULTANT

Dale Shileikis, Vice President
Energy Services Manager
Major Environmental Programs
URS Corporation
One Montgomery Street, Suite 900
San Francisco, CA 94104-4538
dale_shileikis@urscorp.com

COUNSEL FOR APPLICANT

Michael J. Carroll
Latham & Watkins, LLP
650 Town Center Drive, 20th Fl.
Costa Mesa, CA 92626-1925
michael.carroll@lw.com

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

INTERVENORS

*California Unions for Reliable
Energy
Thomas A. Marc D. Joseph
Adams Broadwell Joseph &
Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814
tenslow@adamsbroadwell.com

Tom Frantz
Association of Irrigated Residents
30100 Orange Street
Shafter, CA 93263
tfrantz@bak.rr.com

Kern-Kaweah Chapter
of the Sierra Club
Babak Naficy
Law Offices of Babak Naficy
1504 Marsh Street
San Luis Obispo, California 93401
babaknaficy@sbcglobal.net

Environmental Defense Fund
(EDF)
Timothy O'Connor, Esq.
1107 Ninth St., Suite 540
Sacramento, CA 95814
toconnor@edf.org

Natural Resources Defense
Council (NRDC)
George Peridas
111 Sutter Street, 20th Fl.
San Francisco, CA 94104
gperidas@nrdc.org

ENERGY COMMISSION

JAMES D. BOYD
Vice Chair and Presiding Member
jboyd@energy.state.ca.us

JEFFREY D. BYRON
Commissioner and Associate
Member
jbyron@energy.state.ca.us

Raoul Renaud
Hearing Officer
rrenaud@energy.state.ca.us

Kristy Chew
Adviser to Commissioner Boyd
e-mail service preferred
kchew@energy.state.ca.us

Rod Jones
Project Manager
rjones@energy.state.ca.us

Lisa De Carlo
Staff Counsel
ldecarlo@energy.state.ca.us

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

DECLARATION OF SERVICE

I, Dale Shileikis, declare that on August 30, 2010, I served and filed copies of the attached Response to EPA question on PSD Permit Application, dated August, 2010. 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/hydrogen_energy].

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:

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

X by personal delivery or by depositing in the United States mail at San Francisco, 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:

X 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-8
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.


