

South Coast Air Quality Management District's Comments
Presiding Member's Proposed Decision (November 2010)
Palen Solar Power Project, Section V.B. Air Quality

DOCKET

09-AFC-7

DATE _____

RECD. DEC 01 2010

Page 1, 1st Paragraph under B. Air Quality

Operation of the Palen Solar Power Project (PSPP or proposed project) will create combustion products and use certain materials containing hazardous compounds ~~materials~~ that could expose the general public and workers at the facility to potential health effects.

Page 10, Air Quality Table 6; Page 23, AQ-SC11

These pages include statements indicating that the proposed project complies with the new federal NO₂ standard of 188 µg/m³. Please note that EPA issued a new standard for short-term NO₂ impacts that became effective in April 2010. However, EPA has subsequently issued guidance indicating that the standard is applicable to federal Prevention of Significance (PSD) projects. PSPP does not trigger PSD thresholds and does not require a PSD permit. As a result, this new federal NO₂ standard is not applicable. CEC has recently made such a determination in the PMPD for CPV Sentinel Energy Project (Docket No. 07-AFC-3).

Page 10, Air Quality Table 6 and Last Paragraph

The units in Air Quality Table 6 should be µg/m³, not lb/m³. In addition, the amount of VOC ERC required for this proposed project stated in the last paragraph should be 68 pounds per day instead of 68 pounds.

Page 11, 2nd and 3rd Paragraphs; Page 14, Item 3 under Findings of Fact

These paragraphs include statements regarding the requirements for Palen to provide VOC ERCs or ERC source before AQMD issues the FDOC. Please note that Palen is required to provide sufficient VOC ERCs to satisfy offset requirement before AQMD will issue the Permits to Construct for their proposed project. These paragraphs should be revised to reflect this requirement.

Page 14, Item 11 under Findings of Fact

The ~~South Coast Mojave Desert~~ Air Quality Management District issued a Revised Preliminary Determination of Compliance on October 21, March 5, 2010, imposing conditions of compliance on the project construction and operation to ensure compliance with District Rules and Regulations.

Page 24, 1st Paragraph

b) procure emergency engines that have a NOx emissions guarantee of no more than 2.6 grams per brake ~~break~~ horsepower, or

Page 24 through 39 under C.1.15.2 District Conditions

All conditions under this section should be revised to reflect the changes identified in the engineering evaluation for the FDOC dated 11/30/10.

PROOF OF SERVICE (REVISED 8/27/10) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 12/1/10

MS



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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**APPLICATION FOR CERTIFICATION
FOR THE PALEN SOLAR POWER
PLANT PROJECT**

Docket No. 09-AFC-7

**PROOF OF SERVICE
(Revised 8/27/10)**

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DECLARATION OF SERVICE

I, Teraja` Golston, declare that on December 1, 2010, I served and filed copies of the attached South Coast AOMD Comments on Air Quality Supplemental Staff Assessment, dated September 27, 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:

[\[http://www.energy.ca.gov/sitingcases/solar_millennium_palen\]](http://www.energy.ca.gov/sitingcases/solar_millennium_palen)

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 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-7
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
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I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Original Signature in Dockets
Teraja` Golston