



TETRA TECH EC, INC.

DOCKET

11-AFC-3

DATE MAY 01 2012

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May 1, 2012

Mr. Eric Solorio
California Energy Commission
Docket No. 11-AFC-3
1516 9th St.
Sacramento, CA 95814

Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-3, Minor Change to the Method for Calculating the Permit Limits for the Wartsila Power Cycle Engines

Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulation, and on behalf of Quail Brush Genco, LLC, a wholly owned subsidiary of Cogentrix Energy, LLC, Tetra Tech hereby submits the Minor Change to the Method for Calculating the Permit Limits for the Wartsila Power Cycle Engines. The Quail Brush generation Project is a 100 megawatt natural gas fired electric generation peaking facility to be located in the City of San Diego, California.

If you have any questions regarding this submittal, please contact Rick Neff at (704) 525-3800 or me at (303) 980.3653.

Sincerely,

Constance E. Farmer
Project Manager/Tetra Tech

cc: Lori Ziebart, Cogentrix
John Collins, Cogentrix
Rick Neff, Cogentrix
Proof of Service List

TETRA TECH EC, INC.



Quail Brush Genco, LLC

A Project Company of Cogentrix Energy, LLC

**9405 Arrowpoint Boulevard
Charlotte, North Carolina 28273-8110
(704) 525-3800
(704) 525-9934 – Fax**

May 1, 2012

Mr. Arthur Carbonnel, APC Engineer
San Diego APCD
10124 Old Grove Road
San Diego, CA. 92131

Mr. Joseph Hughes, Air Resources Engineer
California Energy Commission
1516 Ninth Street, MS-40
Sacramento, CA. 95814

Mr. Geoffrey Glass, Environmental Engineer
Environmental Protection Agency, Region 9
Air Division, Permits Office
75 Hawthorne Street (AIR-3)
San Francisco, CA. 94105

Re: Quail Brush Power Project

Gentlemen,

Cogentrix Energy, LLC, as the owner/developer for the proposed Quail Brush Power Project (QBPP), based upon our Power Purchase Agreement (PPA) discussions and negotiations with San Diego Gas and Electric Co. is proposing the following minor change to the method for calculating the permit limits for the Wartsila power cycle engines.

We understand that the draft permit is currently being developed and would like to request the facility limits be based on total mass emissions rather than annual hours of operation. In other words, we are requesting that no limits on annual operating hours be placed in the draft or final agency permits for each engine or for the facility in total, and that engine run hours be based on the proposed hourly, daily, and annual emissions limits. Additionally, we also propose the deletion of the annual fuel use limit on each engine and replace it with a facility wide annual fuel use limit (based on all 11 engines) Thus, we are not proposing a change to the total facility emission limits, but rather a change to the method for tracking compliance that does not use annual engine run hours or individual engine annual fuel use limits. Additionally, we may run some engines more, on an annual basis than others. We will incorporate this into the modeling assessment to insure that no violations to ambient air quality standards or increments would occur. To track compliance, the emissions from each engine will be tracked via the CEMs for NO_x and CO, and with fuel use and emission factors for PM_{10/2.5}, SO_x, and VOCs.

This request is consistent with similar requests on power projects in California, where operational flexibility was granted with respect to run hours, based upon maintaining compliance with proposed hourly, daily, and annual emissions and fuel use limits. Previous projects which have utilized this approach are the Pio Pico Power Project, Roseville Energy Center Project, Oakley Generating Station Project, Russell City Energy Center Project, etc. As stated, the proposed change does not affect the current estimated or proposed facility hourly, daily, or annual emissions values, nor does it affect the proposed annual facility fuel use value as currently evaluated in the permit application.

The QBPP will track emissions and compliance with the applicable emissions limits from each engine, and the engines in total, as follows:

- NOx and CO CEMS, as currently proposed, will be installed on each engine stack, and will be used to track compliance for these pollutants.
- Source testing, coupled with dedicated fuel use meters on each engine, and periodic fuel sampling and analysis, will be used to track compliance for pollutants such as PM (PM10/2.5), SO2, and VOC.
- Individual engine runtimes will be monitored and tracked via the DAHS.

These proposed changes will result in allowing the plant to run more flexibly under the PPA, while at the same time maintaining compliance with the currently proposed emissions values and annual facility fuel use limits.

Please feel free to contact me if you have any questions concerning this proposed change to the QBPP project.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Richard Neff', written in a cursive style.

C. Richard Neff
Vice President – Environment, Health & Safety



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 *QUAIL BRUSH GENERATION PROJECT***

DOCKET NO. 11-AFC-03
PROOF OF SERVICE
(Revised 4/12/2012)

APPLICANT

Cogentrix Energy, LLC
C. Richard "Rick" Neff, Vice President
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APPLICANT'S CONSULTANTS

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DECLARATION OF SERVICE

I, Constance Farmer, declare that on May 1, 2012, I served and filed a copy of the Minor Change to the Method for Calculating the Permit Limits for the Wartsila Power Cycle Engines. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: [<http://www.energy.ca.gov/sitingcases/quailbrush/index.html>].

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- Served electronically to all e-mail addresses on the Proof of Service list;
- Served by delivering on this date, either personally, or for mailing with the U.S. 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 "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- by sending an electronic copy to the e-mail address below (preferred method); **OR**
- by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT
Attn: Docket No. 11-AFC-3
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512 docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California 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.



CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



TO: *All Parties*

Date: April 13, 2012

RE: **QUAIL BRUSH GENERATION PROJECT**

Proof of Service List

Docket No. 11-AFC-03

Attached is the **newly revised** Proof of Service List for the above-mentioned project, current as of April 12, 2012.

Energy Commission regulations (Cal. Code Regs., tit. 20, § 1210) require, in addition to any electronic service, that a paper copy be served in person or by first class mail except where a party requests to receive an electronic copy when one is available. Individuals and groups on the Proof of Service list who prefer to receive filings by e-mail and do not require a paper copy shall inform the Hearing Adviser assigned to the proceeding.

The Proof of Service list for this matter will delineate those individuals and groups and it is sufficient to serve those individuals with an e-mailed copy only. Those not so delineated must be served with a paper copy in addition to any e-mailed copy that the filing party chooses to provide. Signatures may be indicated on the electronic copy by "**Original Signed By**" or similar words.

Unless otherwise specified in a regulation, all materials filed with the Commission must also be filed with the Docket Unit. (Cal. Code Regs., tit. 20, § 1209(d).) Some regulations require filing with the Commission's Chief Counsel instead of the Docket Unit. For example, Section 1720 requires a petition for reconsideration to be filed with the Chief Counsel and served on the parties. Service on the attorney representing Commission staff does not satisfy this requirement. This Proof of Service form is not appropriate for use when filing a document with the Chief Counsel under Title 20, sections 1231 (Complaint and Request for Investigation) or 2506 (Petition for Inspection or Copying of Confidential Records). The Public Advisor can answer any questions related to filing under these sections.

New addition(s) to the Proof of Service are indicated in **bold font** and marked with an asterisk (*). Additionally, if two or more persons are listed on a Proof of Service List

with a single address, only one physical copy of a document need be mailed to the address.

Use this newly revised list for all future filings and submittals. This Proof of Service List will also be available on the Commission's Project Web Site at:

<http://www.energy.ca.gov/sitingcases/quailbrush/index.html>

Please review the information and contact me at rmavalos@energy.ca.gov or (916) 654-3893, if you would like to be removed from the Proof of Service or if there are any changes to your contact information.

RoseMary Avalos
Hearing Adviser's Office