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June 22, 2012

VIA EMAIL

Mr. Eric Solorio, Siting Project Manager California Energy Commission 1516 Ninth Street Sacramento, CA 95814 **California Energy Commission** 

DOCKETED 11-AFC-1

TN # 65909

JUN 22 2012

Re: Pio Pico Energy Center Project (11-AFC-01)

Applicant's Additional Information to EPA re PSD Permit Applicant (Nearby Sources) dated July 6, 2011

Dear Mr. Solorio:

On behalf of Applicant Pio Pico Energy Center, LLC, please find enclosed herein for docketing Applicant's Additional Information to EPA re PSD Permit Applicant (Nearby Sources) dated July 6, 2011 related to Applicant's PSD Permit Application for the Pio Pico Energy Center Project.

Should you have any questions regarding this submittal, please contact me directly.

Respectfully submitted,

Melissa A. Foster

MAF:jmw Enclosure

cc: See Proof of Service List

YEAR S	YEAR SOURCE IT SOURCE NAME ACTUITY	ACIUTY	II APCD DBA	ET NU	STREET NAME	7	CITY	diz	POLLUTANT	LBS/YR	TPY
2004	7263 OTAY LANDELLI	881764	OTAY : AND	1700		9	H	A1910 NOV	NOW	41 312	20.5
2004	7263 OTAY LANDELL		OTAX ANDELL INC	1700	MANAGER OF	8	CHILLAVISTA	91010 28510	28:10	374 918	1975
2004	8719 SYCAMORE		SYCAMORE LANDFILL INC	8514	MAST BL	5	SAN DIEGO	92145 NOX	NO.	18,992	) (1)
2004	87 19 SYCAMORE	6257C	SYCAMORE LANDFILL INC	8514	MAST BL	ð	SAN DIEGO	92145 PM10	PM10	836,961	4185
2005	AS HANSOM	255A	HANSON AGGREGATES PACIFIC		TTH & MAIN STS	d d	CHULA VISTA	91911 PM10	PM10	33,668	16.8
2005	282 HANSON	282A	HANSON AGGREGATES PACIFIC	550	Textess	Ö	ESCONDIDO	52026	PM10	18,152	(J)
2006	128 SUPERIOR	128A	SUPERIOR READY MIX CONCRETE	1508	WISSION RD W	<u>ქ</u>	ESCONDIDO	92029	PRAIG	LUDGE	10.0
2006	SIGI HAMILTON	5161A	HAMILTON SUNDSTRAND POWER	4400	RUFFIN RD	ধ	SAN DIEGO	92173	NON	25,156	12 6
2006	5867 HANSON	2558A	HANSON AGGREGATES PACIFIC	5330	OTAY VALLEY RD	5	CHULA VISTA	91911	PM10	94,221	47.1
2006	7050 MANSON	87161A	MANSON CONSTRUCTION &		PORTABLE	S	SAN PIEGO	92000 NOx	NOX	27,653	13.8
2007	NOSWY CO	180A	HANSON AGGREGATES PACIFIC	9229	HARRIS PLANT NO	ర	SANDIEGO	92145 PM10	PM10	20,723	10.4
2007	94 USN NORTH	4821A	USN AIR STATION NORIS		NAS NORTH ISLAND	5	SAN DIEGO	92135 NOX	MOK	18,200	£ 53
2007	SA USW NORTH	58395A	USN SUPSHIPS	3600	SURFACE NAVY BL	Ü	SANDYEGG	92136	XCX:	16,150	1 8
2007	138 HANSON	1384	HANSON AGGREGATES PACIFIC	9255	CAMINO SANTA FE	ర	SAN DIEGO	92121 PM10	PM10	31,078	15 5
2007	221 USMCBASE /	\$8193A	USMC BASE MILITARY SCHOOLS		CAMP PENDLETON	Š	CAMP	92055	NGX	12,361	6.2
200₹	221 USMCBASE /	98363A	USMC BASE UNPERMITTED		CAMP PENDLETON	S	CAMP	92055	NOX	33,233	116
2007	7270 HANSON	(2) (2) (3)	HANSON AGGREGATES PACIFIC	927	TWIN OAKS VALLEY RD	5	SANMARCOS	92069	PMIG	43,346	21 7
7007	5165 RANSON	9165A	HANSON AGGREGATES PACIFIC	8514	MAST BL	ð	SANIES	92071	PM10	58,810	26.4
2002	10705 CA	167054	CALIFORNIA COMMERCIAL	9228	HARRIS PLANT RD	ð	SANDREC	92145	PM10	24,809	12.4
2007	94343 AGRI SERVICE	943434	2015/2018 INDE	3210	OCEANSIDE BE	5	OCEANSIDE	92687	PN-10	10,933	0.0
2007	96429 / CLOUD INC	96429A	J CLOUD INC	7094	WILLOW GLENDA	CA	EL CAJON	92019 PM10	PM10	12,835	6.4
2008	5985 ENCINA WASTE	\$3255	ENCINA WASTEWATER AUTHORITY	0079	AVENIDA ENCINAS	S	CARLSBAD	92009	NOx	15,893	9
3008	19 NATIONAL	253A	NATI STEEL & SHIPBUILDING A	2798	HARBOR DRIVE	S	SAN DIEGO	92.H3 NO <sub>3</sub>	NOV	25,833	12 6
2003	19 NATIONAL	2534	NATL STEEL & SHIPBUILDING A	2758	HARBOR SHIVE	Š	SANDIEGO	92113 PM10	PM10	46,319	23.2
2008	68 HANSON	300%	HANSON AGGREGATES PACIFIC	12533	HY 67	ð	LAKE SIDE	SCOMO PACLO	PASTO	37,129	18 6
8008	251 PACIFIC GAS	1034A	PACIFIC GAS TURBINE CENTER INC	7007	CONSCIERTED WY	5	SAN DIEGO	92121	NOX	25,794	12.9
2003	556 HANSON	556A	HANSON AGGREGATES PACIFIC	2266	WILLOW GLENDR	ð	E CARON	S2015 PASTS	Page	10,036	5.0
2008	1969 SOUTHERN	1969A	SOUTHERN CALIFORNIA EDISON		HY 101 NUCLEAR GEN	5	SAN ONOFRE	92672 NOx	NOX	54,449	272
2008	2631 KYOCERA	26318	KYCKERA AMERICA INC	1138	BALBOA AV	S	SAN DIEGO	SOLVE NO.	MON	33,265	16 9
2008	4346 CW MCGRATH	4346A	CW MCGRATH INC	1720	JAMACHA RD	J	EL CASON	01999 61026	0.000	11,765	ф (0
2008	4845 USN 32ND ST	*8395A	USA SUPSHIPS	3600	SURFACE NAVY BL	S	SAN DIEGO	92136	NON	12,858	6.4
2008	5924 GAS RECOVERY - 5924B	- 5924B	GAS RECOVERY SYSTEM INC	1615	S&N 0.00 80	S	SAN MARCOS	92068	<b>IK</b> 3K	32,232	16.1
2002	6257 GAS RECOVERY - 6257A	-6257A	GAS RECOVERY SYSTEMS INC	8514	MAST BL	5	SANTEE	92071	NON	40,793	20.4
2008	7630 LARKSPUR	7530A	LARKSPUR ENERGY FACILITY	33.55	OTAY MESA RD	5	SAN DIEGO	92154	PRATO	34,089	7.0
2009	73 CABRILLO	333A	CABRILLO POWER I LLC ENCINA	4600	CARLSBAD BL	1.2	CARLSBAD	92008	MOx	109,233	54 G
2009	73 CABRILLO	383A	CABRILLO POWER ELEC BNOMA	4600	CARLSBAD BL	Y	CARLSTAD	83026	PERTO	95,127	476
2009	171 GROSSMONT	171A	GROSSARDNI DISTRICT HOSPITAL	5555	GROSSMONT CENTER	4	LA MESA	91942 NOx	NOX	778,277	-
2009	351 S. D. STATE	351A	SD STATE UNIVERSITY	5500	CAMPAMILE DR	5	SANDREGG	92182 NOx	NOX	50,891	25.4
2002	1795 SOLAR	1869A	SCLAR FURBINES INC.	4200	SCHIM NO	5	SAN DIEGO	92123 NOx	MOx	188,865	G4 4
2005	1795 SOLAR	1869A	SOLAR TURBINES INC	4200	RUTHIN RD	5	SAN DIEGO	92173	PNILO	15,025	7.5

SDECTY OF PT LOMA         1902         GATCHELL RD         CA         SAM DEGGO         STRICE PARIO           GRANCHELL RD         CA         SAM DEGGO         97210 PARIO           GRANCHELL RD         CA         SAM DEGGO         97210 PARIO           MINNESOTA METHANE SAN DEGGO         4949         EASTGATE MALL         CA         SAN DEGGO         97211 NOX           MINNESOTA METHANE SAN DEGGO         2344         CONVOY ST         CA         SAN DEGGO         97211 NOX           MINNESOTA METHANE SAN DEGGO         2344         CONVOY ST         CA         SAN DEGGO         97211 NOX           MINNESOTA METHANE SAN DEGGO         2344         CONVOY ST         CA         SAN DEGGO         97211 NOX           MINNESOTA METHANE SAN DEGGO         2344         CONVOY ST         CA         SAN DEGGO         97211 NOX           MINNESOTA METHANE SAN DEGGO         2344         CONVOY ST         CA         SAN DEGGO         97211 NOX           DYNEGGY SOUTH BAY LLC         390         BAYER         CA         CALDER GO         97211 NOX           DYNEGGY SOUTH BAY LLC         390         BAYER         CA         SAN DEGGO         97213 NOX           APPLEO BUS REGGO LLC NAVITA         372         BARGADARA         CA	YEAR !	YEAR SOURCE IT SOURCE NAME ACTUITY IS	FACILITY	APCD DBA	ET NU	STREET NAME	2	CITY	ZIP POLLUTANT LBS/YR	LBS/MR	74
SEGNE S. D. CITY PT.         SARIAN         COTTY OF PT. LOMA         1802         CATCHOELI BIND         CA. SANDEGGO         92214 NO.           9524 OLAL, COMIN, SARIAN         QUAL, SARIAN         Q	2005	3680 S. D. CTP PT.	SES11.	SD CITY OF PT LOMA			5	SANDLEGO	S2106 NOx	96,358	45.2
SSAD GOLDALCOMAN, SEGUE, BOLDALCOMAN, SEGUE, SEGU	2009	SESS S. D. CITY PT.	36804	SD CITY OF PT LOMA	1902		5	SAN DIFGO	92106 PM10	22,428	11.2
9922A MANNESOTA         9822A MANNESOTA         MANNESOTA METHANES NA DIEGO 6 499         ENGENERIEMALL         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 6 294         GENERALE MALL         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 234         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 234         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 234         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 234         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 234         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 234         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 244         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 244         COMONY ST.         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 244         CA. SAN DIEGO         9922A MANNESOTA METHANES NA DIEGO 5 244         CA. SAN DIEGO 5 2213 MANNESOTA METHANES NA DIEGO 5 244         CA. SAN DIEGO 5 2213 MANNESOTA METHANES NA DIEGO 5 244         CA. SAN DIEGO 5 2213 MANNESOTA METHANESOTA METHANESO	2002	5640 QUALCOMM,	5640,4	COLAL CORANT BUC	5555		5	SAN DIEGO		\$3,609	26 5
9622A MANNESOTA         9622A MANNESOTA METHANE SAN DEGO 949         BESTIGATE MANNESOTA         CA SAN DEGO         9211 NOA           96327 MANNESOTA         9622A MANNESOTA METHANE SAN DEGO 5244 COMVOY ST         CA SAN DEGO         23,211 NOA           96327 MANNESOTA         9622A MANNESOTA METHANE SAN DEGO 5244 COMVOY ST         CA SAN DEGO         23,211 NOA           27 CANYON ROCK         100 MISSON ASSANCE         CA SAN DEGO         23,211 NOA           27 CANYON ROCK         100 MISSON ASSANCE         CA CHARA METHANE         CA CHARA METHAN           28 CANDAR MATCHANDA COURT BANK         900 BAY BI         CA CHARA METHAN         20,211 NOA           27 CANDAR MATCHANDA COURT BANK         900 BAY BI         CA CHARA METHAN         20,211 NOA           28 CANDAR MATCHANDA COURT BANK         900 BAY BI         CA CHARA METHAN         20,211 NOA           28 CANDAR MATCHANDA COURT BANK         200 BAY BI         CA CHARA METHAN         20,211 NOA           28 CANDAR MATCHANDA COURT BANK         200 BAY BI         CA CHARA METHAN         20,211 NOA           28 CANDAR MATCHANDA COURT BANK         200 BAY BI         CA SAN DEGO         20,211 NOA           28 CANDAR MATCHANDA COURT BANK         200 BAY BI         CA SAN DEGO         20,211 NOA           28 CANDAR MATCHANDA COURT BANK         20,211 NOA         20,211 NOA	\$00%	95224 MINNESOTA	962244	MINNESOTA METHANE SAN DIEGO		20	ď.	SAN DIEGO		50,618	25.3
SHEAT MARKEGOTA         GORNAD STATEMANE SAN DEGO S244         CONNON STATEMANE SAN D	5002	96224 MINNESOTA	96224A				ð	SANDIEGO		17,071	9
368.9. (AMPRESO STATE AND THE ONLY SAM DIRECTO STATE AND STATE	2005	SESSY MINNESOLA	96387A	MINNESOTA METHANE SAN			5	SAN DIEGO	92111 NOx	84,497	42.2
27 CAMPON ROCK - 103A         CANYON ROCK - 103A         CANYON ROCK - 103A         CANYON ROCK - 103A         TOWN ROCK - 103A         CANYON ROCK - 103A         STATE DIMENSION CRAFTER ROCK - 103B         CANYON ROCK - 103B         CANYON ROCK - 103B         STATE DIMENSION CRAFTER ROCK - 103B         CANYON COVERAGE ROCK - 103B         CANYON COVERAGE ROCK - 103B         CANYON ROCK - 103B	2009	96387 MINNESOTA	96387A	MINNESOTA METHANE SAN DIEGO			8	SANDEGO		29,748	14 G
SEG PULCANA         68922A         VUICAN MATERIALS CO WESTERN         548 BILL         CA GHOLA VISTA         98121A         PARTIE         CA GHOLA VISTA         9811A MAIR         77 DAMEGY SOUTH BAY LEC         990 BAY BL         CA CHOLA VISTA         98111 PM NO.           118 CP KELCO         3343         O MERCO SOUTH BAY LEC         990 BAY BL         CA CHOLA VISTA         99111 PM NO.           118 CP KELCO         3343         O MERCO USINC         2025 HARBOR DR E         CA SAN DIEGO         22113 NO.           118 CP KELCO         135A         APPHED BERKEY LIC MARCH         2025 HARBOR DR E         CA SAN DIEGO         22113 NO.           118 CP KELCO         135A         APPHED BERKEY LIC MARCH         200 BACHER BL         CA SAN DIEGO         22113 NO.           118 CP KELCO         135A         APPHED BERKEY LIC MARCH         200 BACHER BL         CA SAN DIEGO         22113 NO.           415 APPHED         415A         APPHED BERKEY LIC MARCH         397 BACHER BL         CA SAN DIEGO         2311 NO.           415 APPHED         415A         APPHED BERKEY LIC MARCH         397 BACHER BLAN STAN         CA SAN DIEGO         23113 NO.           415 APPHED         415A         APPHED BERKEY LIC MARCH         397 BACHER BLAN STAN         CA SAN DIEGO         23111 NA.           415 AP	2009	27 CANYON ROCK	- 103A	CANYON ROCK	7500		3	OCHO NES	92120 PM10	71,732	35 6
TO DIVIDIGOS SOUTHS 334A         DIVIDIGOS SOUTH 334A         DIVID	2003	SE VULCAN	89175A	VULCAN MATERIALS CO WESTERN	5745		ð	SANDIFOR	92108 PM10	88,606	44.3
72 DYNEGY SOUTH 334A         DYNEGY SOUTH BAY LLC         990         RAVEE         CA GRIAN WIGH         910 RAVEE         RAVEE         CA SAN DIGGO         92113 PAND           118 GY REICO         2034         GY REICO USINC         2025         HARRON RES         CA SAN DIGGO         22113 PAND           118 GY REICO         3034         GY REICO USINC         2026         MCDB BLD SGE BND GF         CA SAN DIGGO         22113 PAND           118 GY REICO         318A         APPLIED BRERGY LIC RAGGY         200         PACER BND GF         CA SAN DIGGO         22113 PAND           118 GY REICO         318A         APPLIED BRERGY LIC RAGGY         200         PACER BND GF         CA SAN DIGGO         22113 PAND           218 GY REICO BREGY LIC RAGGY         218A         APPLIED BRERGY LIC RAGGY         220         PACER BND GF         CA SAN DIGGO         22113 PAND           418 APPLIED         415A         APPLIED BRERGY LIC RAGGY         321         APPLIED BRERGY LIC RAGGY         321         APPLIED BRERGY LIC RAGGY         321         APPLIED BREAGY LIC RAGGY         322         APPLIED BREAGY LIC RAGGY         322         APPLIED BREAGY	5002	72 DYNEGY SOUTH	1. TEN 1.	DYNEGY SOUTH BAY LLC			ర	CHULA VISTA		71,493	35 7
118 CYRECCO         293A         CYRECOUSINC         2025         HARBOR DR         CA         SAN DIEGO         22133 NOX           118 CYRECCO         128 A         APPLED         15A         APPLED         15A         APPLED         233         APPLED         231         APPLED         23133 NOX         32133 NOX         3213 N	2009	72 DYNEGY SOUTH	334A	DYNEGY SOUTH BAY LLC	066		5	CISULAVISTA		73,515	36 B
115 CF RELGO 1934 GF KELCO US INC. 102 HGREON FREE CM STARTORES CONTROLLES OF STATE	2009	118 CP KELCO	203A.	CP KELCO US INC	2025		5	SAN DIEGO		77,600	36.8
149 APPLIED 154 APPLIED CHERGY LLC MCND MCRD BLD 566 END OF CA. SAN DIEGO 92138 PKON 167 APPLIED 154 APPLIED 154 APPLIED CHERGY LLC MCND MCRD BLD 566 END OF CA. SAN DIEGO 92138 PKON 167 SOLAR 1861NES INC. 2000 ACCIDICATIVA 240 CA. SAN DIEGO 22100 NCD ACCIDICATIVA 240 CA. SAN DIEGO 22100 NCD ACCIDICATIVA 240 CA. SAN DIEGO 22100 NCD ACCIDICATIVA 240 CA. SAN DIEGO 22136 PKON CA. SAN DIEGO 22136	2009	118 CP K9,CO	203A	CP KELCO US INC	2025		Y	SAN DANGO		12,750	6.4
149 APULED         15A         APPRILED FINE NOT LIC FACUR         MCRD BLD S66 END OF         CASAN DIEGO         92131 PATIO           167 SOLAM         368A         SOLAR TURBINES INC         2200         PACIFICATION         CASAN DIEGO         92131 PATIO           159 SOLAM         368A         SOLAR TURBINES INC         2300         PACIFICATION         CASAN DIEGO         9213 PATIO           415 APPLIED         415A         APPLIED DENERGY LIC NAVAL         397         SURFACE NAVY BL         CASAN DIEGO         9213 PATIO           415 APPLIED         415A         APPLIED DENERGY LIC NAVAL         397         SURFACE NAVY BL         CASAN DIEGO         9213 PATIO           415 APPLIED         415A         APPLIED DENERGY LIC NAVAL         397         SURFACE NAVY BL         CASAN DIEGO         9213 PATIO           517 UCSO CAMPUS         405A         GACANINO DE LA REINA         50         CAMINO DE LA REINA         9211 MAY           517 UCSO CAMPUS         405A         LCAD         BADECO         9211 MAY         9211 MAY           4324 USMCARIA         482A         LCAD         LCAD         1000 PELA REINA         CASAN DIEGO         92118 MAX           4324 USMCARIA         482A         LCAD         LCAD         LCAD         1000 PELA REINA	2009	145 APPLIED	15A	APPLIED ENERGY LLC MCRD			3	SAN DIESO		60,755	404
167 SOLAM   3684   SOLAM TURBINES INC   2200 PACIFICHY   CA SANTÉR   92010 PADR   1590 PACIFIC PATA   15	2009	149 APPLIED	154	APPLIED ENERGY LLC MCSO			8	SAN DIEGO		25,650	12.8
139 NCP BLOCK &         290A         APPLIED ENR GYLLC MAVAL         370 SURFACE MAYP BL         CA         SAN DIEGO         920Th PRO110           415 APPLIED ENR GYLLC MAVAL         370 SURFACE MAYP BL         CA         SAN DIEGO         92136 MAX           418 APPLIED ENR GYLLC MAVAL         370 SURFACE MAYP BL         CA         SAN DIEGO         92136 MAX           418 APPLIED ENR GYLLC MAYAL         370 SURFACE MAYP BL         CA         SAN DIEGO         92136 MAX           517 UCSD CAMPUS         402A         UCSD         GILMAN DR DEPT 0089         CA         SAN DIEGO         92138 MAX           517 UCSD CAMPUS         402A         UCSD         GILMAN DR DEPT 0089         CA         SAN DIEGO         92138 MAX           4824 USMCARR         482AA         UCSD         SAR DIEGO         CA         SAN DIEGO         92145 MAX           4824 USMCARR         482AA         UCSD         SAR DIEGO         CA         SAN DIEGO         92145 MAX           4824 USMCARR         482AA         UCSD         GILMAN DR DEPT 0089         CA         SAN DIEGO         92145 MAX           4824 USMCARR         482AA         UCSD         GILMAN DR DEPT 0089         CA         SAN DIEGO         92145 MAX           482AA         GLACH CACS MIRAMAR 3AD MAW	2009	167 SOLVR	368A	SOLAR TURBINES INC			ð	SAN DIEGO		33,159	16 6
415 APPLIED	3009	290 RCP BLOCK &	290A	ace secon & brick inc			ð	SAMIEC	SACA PMIO	11,663	5.8
413 APPLIED         415A         APPLIED ENERGY LLC NAVAL         3970         SURFACE NAVY BL         CA         5AN DIEGO         92136         PRSI           478 BAE SYSTEMS         44A         BAE SYSTEMS SAN DIEGO SHIP         FOOT OF SAMPEGO         25AN DIEGO         92138         NOX           517 UGSD CAMPUS         403A         UCSD         9500         GILMAN DR DEPT 0089         CA         SAN DIEGO         92138         NOX           4824 USMCARR         4824 USMCARR         4824 USMCARR         4824 USMCARR         4824 USMCARR         CA         SAN DIEGO         92145 PAND         92145 PAND           4824 USMCARR         4824 USMCARR         4824 USMCARR         4824 USMCARR         4824 USMCARR         CA         SAN DIEGO         92145 PAND           4824 USMCARR         4824 USMCARR         4824 USMCARR         4824 USMCARR         CA         SAN DIEGO         92145 PAND           4825 USMCARR         4824 USMCARR         4824 USMCARR         4824 USMCARR         APPLIED ENERGY LLC NORTH         CA         SAN DIEGO         92145 PAND           5220 APPLIED         54A         APPLIED ENERGY LLC NORTH         CAYA RHORER         CA         CALULA VISTA         92145 PAND           6058 PACIFIC         6058 PACIFIC         6058 PACIFIC         6	2009	415 APPLIED	415A	APPLIED ENERGY LLC NAVAL	3370		ð	SANDIESO		112,419	562
478 BAE SYSTEMS         34A         BAE SYSTEMS SAN DIEGO SHIP         FOOT OF SAMPSON ST         CA SAN DIEGO         9213 NOX           517 UCSD CAMPUS         402A         UCSD         350         GILMAN OR DEPT 0089         CA SAN DIEGO         92093 NOX           517 UCSD CAMPUS         402A         UCSD         AND DIEGO         25093 NOX         92093 NOX           4824 USMCARR         482A         USMC MICAS BRIRAMAR RED MAN         452A         USMC MIRAMAR RED MAN         452A         SAN DIEGO         92145 PGX           4824 USMCARR         482A         USMC MCAS MIRAMAR RED MAN         452A         USMC MIRAMAR RED MAN         452A         SAN DIEGO         92145 PGX           4835 USM CARR         482A         USM CAS MIRAMAR RED MAN         452A         USM MIRAMAR RED MAN         452A         NAVY HOSPITAL         CA SAN DIEGO         92145 PGX           5270 APPLIED         5AA         APPLIED ENERGY LIC NORTH         QUAY & ROGERS RD         CA SAN DIEGO         92158 PGX           5270 APPLIED         5ABA         PACIEC RECOVERY CORP         TOTAY LANDFILL         CA CHULLA VISTA         92158 PGX           6688 PACIFIC         5608A         PACIEC RECOVERY CORP         102AY & ROGERS RD         CA CHULLA VISTA         92158 PGX           8013 SEGRE         803A<	2003	415 APPLIED	4158	APPLIED ENERGY LLC NAVAL	3870	34.	5	SAN DIEGO	92136 PM16	44,506	22 3
517 UCSD CAMPUS         402A         UCSD         GILMAN DR DEPT 0089         CA SAN DIEGO         92093 NOR           157 UCSD CAMPUS         402A         UCSD         CAMINO DE LA REINA         CA SAN DIEGO         92093 NOR           157 UCSD CAMPUS         482A         USAC MICAS BREAMER         ASAN DIEGO UNION TRIBUNE LIC         350         CAMINO DE LA REINA         CA SAN DIEGO         92108 NOX           4824 USMCARIR         482A         USAC MICAGA BREAMER         LEAC CARCAS BREAMER         CA SAN DIEGO         92108 NOX           4824 USMCARIR         482A         USAC MICAGA MIRAMAR 3PD MAY         USAC MIRAMAR 3PD MAY         CA SAN DIEGO         92148 NOX           4824 USMCARIR         482A         USAC MICAGA MIRAMAR 3PD MAY         USAC MIRAMAR 3PD MAY         CA SAN DIEGO         92148 NOX           5270 APPLIED         54A         APPLIED ENERGY LIC NORTH         CASAN DIEGO         92148 NOX           5270 APPLIED         55A         APCIFIC RECOVERY CORP         OTAY LANDFILL         CA CHULA VISTA         92148 NOX           6088 PACIFIC         6088 PACIFIC         6088 PACIFIC         6088 PACIFIC         APCHEC RECOVERY CORP         CA CHULA VISTA         92148 NOX           8013 SOGSE         8013 SOGSE         ALULA MATERIALS WESTERN         10021 FILL NUSTA         CA CHULA VIST	SIM	478 BAE SYSTEMS	344A	BAE SYSTEMS SAN DIEGO SHIP			5	SAM DEGO	92113 NOx	14,607	7.3
517 UCSD CAMPUS         402A         UCSD         SAN DIEGO UNION TRIBUNE LLC         350 GILMAN DR DEPT 0089         CA SAN DIEGO         \$202B PAND           4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         CA SAN DIEGO         92108 NOX           4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         CA SAN DIEGO         92108 NOX           4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         USMC MACAS MIRAMAR BRD MANY         4524 MIRAMAR         CA SAN DIEGO         92145 NOX           4835 USM HOSPITAL         4835A         USMC MACAS MIRAMAR BRD MANY         4524 MIRAMAR         CA SAN DIEGO         92145 NOX           5270 APPLIED         54A         APPLIED ENERGY LLC NORTH         QUANY ROGERS RD         CA SAN DIEGO         92145 NOX           6088 PACIFIC         6088 A         PACIFIC RECOVERY CRAR         OTAY LANDFILL         CA CHULA VISTA         9131 PM10           6088 PACIFIC         6088 A         PACIFIC RECOVERY CRAR         10051 SINCK ROOMPILL         CA CHULA VISTA         91211 PM10           608 PACIFIC         6088 A         VUICAN MATERIALIS WESTERN         10051 SINCK ROOMPILL         CA CHULA VISTA         91211 PM10           8013 SIGGRE         80134 SIGGRE         80134 SIGGRE         SOCO PUULA WISTA	2002	517 UCSD CAMPUS	402A	ncsp		_	5	SAN DIEGO	92093 NOx	18,738	64
4824 USMCAIR         1976A         SAN DIEGO UNIONTRIBUNE LLC         350         CAMINO DE LA REINA         CAM DIEGO         92108 NOX           4824 USMCAIR         52145 MOX         52145 MOX           4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         5214 USMCAIR         5215 USMCAIR<	5009	517 UCSD CAMPUS	4024	ncsp		GILMAN DR DEPT 0089	S	SAN DIEGO		19,504	8 6
4824 USMCAIR         4824A         USMCAMERARIA         USMC MIRAMAR         CAS AN DIEGO         92145 PGX           4824 USMCAIR         4824A         UGAC MCAS BRIBAMBR BD MAW         45249         MIRAMAR WY BLDG         CAS AN DIEGO         92145 PGX           4824 USMCAIR         4824D         USMC MCAS BRIBAMBR BD MAW         45249         MIRAMAR WY BLDG         CAS AN DIEGO         92145 PGX           4835 USM HOSPITAL         4835 USM HOSPITAL 2 PWC         NAVY HOSPITAL         CAS AN DIEGO         92145 PGX           5270 APPLIED         54A         APPLIED ENERGY LIC NORTH         22VAY & ROGERS PD         CAS AN DIEGO         92145 PGX           6088 PACIFIC         6068A         PACIFIC RECOVERY CORP         OTAY LANDFILL         CAS CAN DIEGO         92145 PGX           6088 PACIFIC         6068A         PACIFIC RECOVERY CORP         OTAY LANDFILL         CAS CAN DIEGO         92145 PGX           6088 PACIFIC         6068A         PACIFIC RECOVERY CORP         OTAY LANDFILL         CAS CAN DIEGO         92145 PGX           6088 PACIFIC         6068A         PACIFIC RECOVERY CORP         OTAY LANDFILL         CAS CAN DIEGO         92029 PM10           8013 SDG&F         8013 AS         SDG&E PALOMAR ENERGY CENTER 2300         HARVESON P         CAS CONDIDO         SCOS CORPUENC	2002	1976 UNION	1976A	SAN DIEGO UNION TRIBUNE LLC	350	_	ð	SAN DIEGO		15,977	80
4824 USMCAIR         4824 USMCAIR         USMC MIRAMAR 3RD MAW         45249 MIRAMAR WY BLDG         CA         SAN DIEGO         92145 PM310           4824 USMCAIR         4824 USMCAIR         4824 USMCAIR         4824D USMC MCAS MIRAMAR 3RD MAW         45249 MIRAMAR WY BLDG         CA         SAN DIEGO         92145 PM310           4835 USN HOSPITAL         54A         APPLIED ENERGY LLC NORTH         20AY & RYSERS RD         CA         SAN DIEGO         92145 PM31           6068 PACIFIC         6068 PACIFIC ECOVERY CORPY         QUAY & ROGERS RD         CA         SAN DIEGO         92145 PM31           6068 PACIFIC         6068 PACIFIC         6068 PACIFIC ECOVERY CORPY         OTAY LANDFILL         CA         CHULA VISTA         91911 PM10           6366 VULCAN         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         CA         CA         CALLA VISTA         91911 PM10           6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         CA         CA         CALLA VISTA         91911 PM10           6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         CA         CALLA VISTA         91911 PM10           8013 SPGRE         8033 SPGRE         8034 SPGRE <t< td=""><td>2003</td><td>4824 USMCAIR</td><td>4824A</td><td>USING MICAS MIRANIAR</td><td></td><td>USMC MIRAMAR</td><td>CA</td><td>SAN DIEGO</td><td></td><td>175,379</td><td>87.7</td></t<>	2003	4824 USMCAIR	4824A	USING MICAS MIRANIAR		USMC MIRAMAR	CA	SAN DIEGO		175,379	87.7
4824 USMCARR         4824D         USMC ARCAS MIRAMAR 3RD MAW         4524 USM CARE         CA         SAN DIEGO         92145 NDR           4835 USN HOSPITAL 2 PWC         SAA         APPLIED ENERGY LIC NORTH         QUAY & HOSPITAL         CA         SAN DIEGO         92136 NDR           5270 APPLIED         SAA         APPLIED ENERGY LIC NORTH         QUAY & HOGERS RD         CA         SAN DIEGO         92138 NDA           6058 PACIFIC         6058 A         APPLIED ENERGY LIC NORTH         QUAY & HOGERS RD         CA         SAN DIEGO         92138 NDA           6058 PACIFIC         6058 PACIFIC         6058 A         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA         CHULA VISTA         91911 PM10           6396 VULCAN         6058 PACIFIC         6058 A         VULCAN MATERIALS WESTERN         10051 SMCN SAN DIEGO         52 2625 PM10         92225 PM10           8013 SDG&E         8013 SDG&E         8013 SDG         604 LURE LP         530         14RVESON PL         CA         52 CONDIDO         92225 PM10           8013 SDG&E         8010 A         SDG         604 LURE LP         530         14RVESON PL         CA         52 CONDIDO         92025 PM10           8155 GGAL LURE LP         5022A         604 LURE LP         530         14RVESON PL <td< td=""><td>2009</td><td>4824 USMCAIR</td><td>4824A</td><td>USIAC MICAS MIRAMAR</td><td></td><td>USMC MIRAMAR</td><td>e C</td><td>SAN DIEGO</td><td>92145 PM10</td><td>10,561</td><td>5.3</td></td<>	2009	4824 USMCAIR	4824A	USIAC MICAS MIRAMAR		USMC MIRAMAR	e C	SAN DIEGO	92145 PM10	10,561	5.3
4835 USN HOSPITAL         4835 USN HOSPITAL         4835 USN HOSPITAL         USN HOSPITAL 2 PWC         NAVY HOSPITAL         CA         SAN DIEGO         50134 N.D.           5270 APPLIED         54A         APPLIED ENERGY LLC NORTH         QUAY & ROGERS RD         CA         SAN DIEGO         92135 NOW           6088 PACIFIC         6088         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA         CHULA VISTA         9131 PM10           6088 PACIFIC         6088         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA         CHULA VISTA         9121 PM10           6088 PACIFIC         6088         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA         CHULA VISTA         9121 PM10           6088 PACIFIC         6088         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA         CHULA VISTA         9121 PM10           6088 PACIFIC         6068         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA         CHULA VISTA         9121 PM10           8013 SDG&F         8013 SDG&F         PACIFIC RECOVERY CORP         3200 HARVESON P         CA         CA </td <td>5002</td> <td>4824 USMCAIR</td> <td>4824D</td> <td></td> <td></td> <td></td> <td>CA</td> <td>SAN DEGO</td> <td></td> <td>42,424</td> <td>212</td>	5002	4824 USMCAIR	4824D				CA	SAN DEGO		42,424	212
5270 APPLIED         54A         APPLIED ENERGY LIC NORTH         QUAY & ROGERS RD         CASEN DREGO         92135 NON           5270 APPLIED         54A         APPLIED ENERGY LIC NORTH         QUAY & ROGERS RD         CASEN DREGO         92135 NATO           6058 PACIFIC         6068A         PACIFIC RECOVERY CORP         OTAY LANDFILL         CASEN DREGO         92135 NATO           6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         CASEN DREGO         92135 NATO           6306 VULCAN         6306A         VUICAN MATERIALS WESTERN         10051 SLACK ROUNDING         CASEN DREGO         92135 PM10           8013 SDG&E         8013 SDG&E         ALIOMAR ENERGY CENTER         2300 HARVESON PL         CASEN DREGO         92126 PM10           8013 SDG&E         8013 SDG&E         ALIOMAR ENERGY CENTER         2300 HARVESON PL         CASEN DREGO         92126 PM10           8455 GGAL LINE LIP         92022A         GOAL LINE LIP         555         TULIP ST N         CASEN DREGO         92105 PM10           8455 GGAL LINE LIP         9202A         GOAL LINE LIP         555         TULIP ST N         CASEN DREGO         92105 PM2           86072 S. D. CITY -         6072A         SO COY PULBA LANDFILL         231         CANDOY ST         CASEN DREGO	5002	4835 USN HOSPITAL	48354	USN HOSPITAL 2 PWC			5	SAN DIEGO		21,328	10.7
5270 APPLIED         54A         APPLIED ENERGY LLC NORTH         QUAY & ROGERS RD         CA SAN DIEGO         32.35 PM to No.           6058 PACIFIC         6068 A         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA CHULA VISTA         919.11 PM 10           6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         CA CHULA VISTA         919.11 PM 10           6306 VULCAN         6306A         VULCAN MATERIALS WESTERN         1005.1 SLACK RECONDINGLIC         CA CHULA VISTA         919.11 PM 10           8013 SDG&E         8013 A         SDG&E PALOMAR ENERGY CENTER         2300         HARVESON PL         CA CSCONDING         S2025 PM 10           8013 SDG&E         8013 A         SDG&E PALOMAR ENERGY CENTER         2300         HARVESON PL         CA CSCONDING         S2025 PM 10           8013 SDG&E         8013 A         SDG&E PALOMAR ENERGY CENTER         2300         HARVESON PL         CA CSCONDING         S2025 PM 10           8455 GGAL LINE LP         9202A         GOAL LINE LP         555         TULIP ST N         CA ESCONDING         S2025 PM 10           8177 S. D. COUNTY -         5002A         SD CITY OF SO CHOLLAS LANDFILL         278         CANDING CO         CA SAN DIEGO         S2105 NOX           88196C S. D. CITY -         <	2009	5270 APPLIED	54A	APPLIED ENERGY LLC NORTH			CA	SAN DEGO	92135 NOs	44,090	22.0
6068 PACIFIC         6068 PACIFIC         PACIFIC RECOVERY CORP         OTAY LANDFILL         CA. CHULA VISTA         91931 PM10           6068 PACIFIC         6060 PACIFIC<	2009	5270 APPLIED	54A	APPLIED ENERGY LLC NORTH		QUAY & ROGERS RD	45	SAN DIEGO	52135 PM10	30,948	15.5
6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         6068 PACIFIC         CARLANDFILL         CARLAN STANDEGO         CALLAN STANDEGO         9131 PM10           6396 VULCAN         \$0.50.6A         VULCAN MATERIALS WESTERN         10051         \$1.40.0FRL         CARLANDFOLD         \$2.50.0 PM10           8013 SDG&E         \$0.50.6A         \$1.50.0MAR ENERGY CENTER         2300         MARVESON PL         CARLANDFOLD         \$2.50.0 PM10           \$450.0A.C. LINE LP         \$2.50.2A         GOAL LINE LP         \$55         TULIP ST N         CARCONDIDO         \$2.02.0 PM10           \$450.0A.C. LINE LP         \$2.50.2A         GOAL LINE LP         \$55         TULIP ST N         CARCONDIDO         \$2.02.0 PM10           \$450.0A.C. LINE LP         \$2.00.2A         GOAL LINE LP         \$55         TULIP ST N         CARCONDIDO         \$2.02.0 PM10           \$417.S. D. COUNTY -         \$2.02.2A         SOC OF PUB WKS SAN MARCOS         \$50.0 PM10         \$2.00.0 PM0         \$2.00.0 PM0           \$81.96.S. D. CITY -         \$81.96.C         \$5.0 CM10 OF PUB WKS SAN MARCOS         \$5.0 CM0 OF PUB WKS SAN MARCOS         \$2.00.0 PM0         \$2.00.0 PM0           \$82.96.S. D. CITY -         \$81.96.C         \$5.0 CM10 OF PUB WKS SAN MARCOS         \$2.00.0 PM0         \$2.00.0 PM0         \$2.00.0 PM0	2009	6058 PACIFIC	SOSSA	PACIFIC RECOVERY CORP			S	EHEUA VISTA		20,23	44 6
6306 VULCAN         GADGE         VULCAN MATERIALS WESTERN         10051         SIACH MOUNTAIN RD         CA         SAN DIEGO         92126 PM10           8013 SDG&E         8013 A         SDG&E PALOMAR ENERGY CENTER         2300         MARVESON PL         CA         ESCONDIDGO         92029 PM10           8459 GOAL LINE LP         92022 A         GOAL LINE LP         555         TULIP ST N         CA         ESCONDIDGO         92029 PM10           8459 GOAL LINE LP         92022 A         GOAL LINE LP         555         TULIP ST N         CA         ESCONDIDGO         92029 PM10           8717 S. D. COUNTY -         5924C         SD CO OF PUB WKS SAN MARCOS         SAN MARCOS LANDFILL         A ESCONDIDGO         92025 PM10           88196 S. D. CITY -         88196 C         SD CITY OF SO CHOLLAS LANDFILL         2781         CAMINITO CHOLLAS         CA         SAN DIEGO         92105 NOX           88296 S. D. METRO         89296 S. D. METRO PUMPING STATION #2         4077         HARBOS DIN         CA         SAN DIEGO         92105 NOX	2005	6068 PACIFIC	6068A	PACIFIC RECOVERY CORP			5	CHULA VISTA	91911 PM10	31,056	16.5
8013 SDG&E         8013 SDGAE         8013 SD	SEXE.	6306 VUICAN	6306A	VULCAN MATERIALS WESTERN			5	SANDIEGO	92126 PM10	54,235	27 1
8013 SDG&E         80134 SDG&E         SDG&E PALOMAR ENERGY CENTER 2300 HARVESON PL         CA         ESCONDIGG         92029 PM10           3459 GOAL EMETP         9202A         GOAL EMETP         555         TULP ST N         CA         ESCONDIGG         92025 PM10           8459 GOAL EMETP         9202A         GOAL LINE LP         555         TULP ST N         CA         ESCONDIGG         92025 PM10           8717 S. D. COUNTY - 5924C         SD CO OF PUB WKS SAN MARCOS         SAN MARCOS LANDFILL         CA         SAN MARCOS SO CA         92025 PM10           86072 S. D. CITY - 6077A         88196 S. D. CITY - 700 CF MIRASHAR LANDFILL         2781         CAMINITO CHOLLAS         CA         SAN DIEGO         9211 PM10           89296 S. D. METRO         89296 S. D. METRO PUMPING STATION #2         4077         HARBOS DIN         CA         SAN DIEGO         92105 NOX	2009	8013 SDG&E	80134		2300		15 15	COUNTRY		190,822	8
\$450 GENELLINE LIP         97022A         GOAL LINE LIP         555         TULIP ST N         CA         ESCONDIDO         SEQUENCIA           \$450 GENELLINE LIP         555         TULIP ST N         CA         ESCONDIDO         SEQUENTIA           \$717 S. D. COUNTY -         5924C         SD CO OF PUB WKS SAN MARCOS         SAN MARCOS LANDFILL         CA SAN MARCOS         \$2065 FM24           \$6072 S. D. CITY -         \$6072A         SD CITY OF SO CHOLLAS LANDFILL         2781 CAMINITO CHOLLAS         CA SAN CHEGO         9211 FM16           \$8196 S. D. CITY -         \$8196C         SD CITY OF PURITABLAR LANDFILL         \$180 CONVOY ST         CA SAN DIEGO         92105 NOX           \$8226 S. D. METRO         \$9296A         SD METRO PUMPING STATION #2         4077 HARBOR DR N         CA SAN DIEGO         92105 NOX	2009	8013 SPG&E	8013A		2300		₹	COORDIO	92029 PM10	75,246	376
8459 GGA! LINE IP         920224         GOAL LINE IP         555         TULP ST N         CA         ESCONDIDO         \$2025 FM10           8717 S. D. COUNTY - 5924C         SD CO OF PUB WKS SAN MARCOS         SAN MARCOS LANDFILL         CAN MARCOS LANDFILL         CAN MARCOS LANDFILL         SAN MARCOS SAN MARCOS         S2025 FM10           86072 S. D. CITY - 80372A         SD CITY OF SO CHOLLAS LANDFILL         S180 CONVOY ST         CA SAN DIEGO         92105 NOX           88196 S. D. CITY - 89296A         SD METRO PUMPING STATION #2         4077 HARBOS RD N         CA SAN DIEGO         92105 NOX	2003	MASS GOAL UNE FP	92022A	GOAL SIME LP	555		ð	ESCONDIDO		37,856	18 Ç
8717 S. D. COUNTY - 5924C         SD CO OF PUB WKS SAN MARCOS         SAN MARCOS LANDFILL         CAMINITO CHOLLAS         CA SAN DREGO         92105 NOX           86072 S. D. CITY - 88196C         SD CITY OF SO CHOLLAS LANDFILL         2781         CAMINITO CHOLLAS         CA SAN DREGO         92105 NOX           88196 S. D. CITY - 88296C         SD CITY OF PURANGAR LANDFILL         5180         CONVOY ST         CA SAN DREGO         92111 PM16         1           89296 S. D. METRO         89296A         SD METRO PUMPING STATION #2         4077         HARBURDER DR         CA SAN DREGO         92108 NOX	2005	8459 SCALUMELP	92023A	GOAL LINE LP	555		CA	ESCONDIDO	S2025 PM10	31.956	C 9Z
86072 S. D. CITY -         \$6072A         SD CITY OF SD CITY OF SO CHOLLAS LANDFILL         \$781         CAMINITO CHOLLAS         CA SAN DIEGO         92111 PM 16           88196 S. D. CITY -         88196C         SD CITY OF MIRAMAR LANDFILL         \$180         CONVOY ST         CA SAN DIEGO         92111 PM 16           89296 S. D. METRO         89296A         SD METRO PUMPING STATION #2         4077         HANBOR DR N         CA SAN DIEGO         92108 PDx	2009	8717 S. D. COUNTY -	5924C	SD CO OF PUB WKS SAN MARCOS	•		5	SAN MARCOS		19,143	90
88196 S. D. CITY - 88196C SD CPLY OF MIRAMAG LANDFILL SISO CONVOY ST CA SAN DIEGO 92111 PM 10 89296 S. D. METRO 89296A SD METRO PUMPING STATION #2 4077 HANSON DR N CA SAN DIEGO 92166 MOX	2009	86072 S. D. CITY -	\$6072A	SDCI			ĕ.	SAN DIEGO		12,552	6.3
89296 S. D. METRO 892964 SD METRO PUMPING STATION #2 4077 HANSORDRN CA SAN DIEGO 92108 NOX	2003	88196 S. D. CITY -	88196C	SO GITY OF MIRAMAR LANDFILL				SAN DIEGO	92111 PM10	164,444	82.2
	2003	89296 S. D. METRO	\$9296A	SD METRO PUMPING STATION #2				SAN DIEGO	92106 NOx	27,262	136

July 6, 2011



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Carol Bohnenkamp U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA 94105

### Dear Ms. Bohnenkamp:

In our conversations regarding modeling for the PSD permit application for the Pio Pico Energy Center (PPEC), you requested clarification of our proposal for characterizing the combined impact of the PPEC and existing sources. That clarification is provided below.

### Nearby Sources

### Non-Project Sources Included in Cumulative Impact Modeling

The basis for selecting non-project sources to include in the cumulative impact modeling was described in detail in PPEC's April 1, 2011 PSD permit application. We used the results of preliminary (project only) modeling of project emissions, based on San Diego meteorology, to develop an emission-to-distance ratio to estimate the farthest extent at which a source might be expected to have impacts above the PSD Significant Impact Levels (SILs). We did not use this level as a "bright line" to eliminate non-project sources from consideration. Rather, we used this ratio to separate non-project sources into three groups: those that clearly could be excluded, those that clearly should be included, and those where additional judgment was required. We discussed the basis for including or excluding sources from the third group in the April 1 PSD application.

After applying the procedure outlined above to the list of facilities provided by the District, PPEC proposed to include the following non-project sources in the cumulative impact modeling:

- NOx emissions from Larkspur Energy Facility (a small peaking plant located
   2.5 km west of the project site);
- NOx emissions from Pacific Recovery Corp (landfill gas waste-to-energy facility
   9.2 km west of the project site); and
- NOx and PM<sub>2.5</sub> emissions from Otay Mesa Generating Company (a power plant located adjacent to the project site).

### Non-Project Sources Not Included in Cumulative Impact Modeling

During our discussions, you requested additional information regarding the following facilities that we had not proposed to include in the cumulative impact modeling analysis: Hanson Aggregates (Otay Valley Road) and Otay Landfill; Dynegy South Bay; Solar Turbines; and Manson Construction and Engineering. The requested information is provided below.

<u>Hanson Aggregates (Otay Valley Road) and Otay Landfill</u> – You requested clarification of our estimation of PM<sub>25</sub> emissions from these sources (based on the PM<sub>10</sub> emissions provided by the District).

The District provided PM<sub>10</sub> emission inventory data for all sources in the District with PM<sub>10</sub> emissions greater than 5 TPY. The District did not provide PM<sub>2.5</sub> emissions. Where PM emissions are from combustion, we assumed that all of the emissions were PM<sub>2.5</sub>. For Hanson Aggregates and Otay Landfill, however, the PM<sub>10</sub> emissions are fugitive dust emissions—earth moving, material handling, and vehicle traffic on dirt roads.

We estimated the PM<sub>2.5</sub> emissions from the fugitive dust sources at these facilities using a PM<sub>2.5</sub>/PM<sub>10</sub> fraction of 20% and the PM<sub>10</sub> emissions provided by the District. This fraction was based on the CEC's treatment of PM<sub>10</sub> offsets from road paving projects (e.g., the CEC estimated that the PM<sub>2.5</sub> fraction of fugitive dust reductions at the Altamont Landfill would be 15% of the PM<sub>10</sub> reductions).<sup>2</sup>

For comparison, the following table shows AP-42 factors for various dust-generating activities similar to those found at landfills and aggregate plants; they range from 5:1 to 15:1.

	Vehi	AP-42 Factors cle traffic—dirt	roads	
AP-42 Section	Category	PM <sub>10</sub> factor	PM <sub>2.5</sub> factor	Ratio
11.19.2	Tertiary Crushing (controlled)	0.00027 kg/Mg	0.00005 kg/Mg	0.19
11.19.2	Screening (controlled)	0.00037 kg/Mg	0.000025 kg/Mg	0.07
11.19.2	Truck Loading (controlled)	5.0E-05 kg/Mg	ND	
13.2.2	Vehicle Traffic (Unpaved Roads)	k= 1.5 lb/VMT	K =0.15 lb/VMT	0.10

Please note that the ratio shown in the seventh column of Table 7-1 of the PSD application reflects the PM10 emission to distance ratio, and not the PM2.5 to distance ratio as indicated in the column header. The adjustment in this calculation for PM2.5 fraction was described on Page 23 of the PSD application.

<sup>2</sup> CEC Staff, Final Staff Assessment, Tesla Power Project, April 2003. Air Quality Table 19, p. 4.1-40

The 20% fraction that we used to estimate PM<sub>2.5</sub> emissions from reported fugitive PM<sub>10</sub> emissions is therefore at the conservative end of the range of published emission factors.

<u>Dynegy South Bay</u> – You requested documentation confirming that the facility has been permanently closed. The requested documentation is provided in Attachment 1.

Solar Turbines – You asked for a map showing the location of this facility. Please see Figure 7-2 of the PSD application. The Solar Turbines test facility (Site 45) is near the San Diego airport, near the vertical center on the far left of the figure.

Manson Construction and Engineering – You requested documentation confirming that the reported emissions are for non-stationary sources, located throughout the District. The table of stationary sources and their emissions that was provided by the District is presented in Attachment 2. Manson is the 10<sup>th</sup> facility on page 1, and the street name for the equipment is listed as "PORTABLE," indicating that the emissions are associated with portable equipment.

### Source of Ambient Background Data

You indicated that Region 9 was considering whether to recommend use of ambient monitoring data from the Otay Mesa Border Crossing to characterize regional background concentrations for this demonstration. There is no technical basis for considering the Otay Mesa monitoring data to be representative of regional pollution levels. The monitor is clearly impacted by the heavy traffic—comprised in significant part by Mexican vehicles not subject to California's emission standards—that idles at the border waiting for permission to cross. This traffic is located within a few hundred feet of the monitoring station. Because of these impacts, the monitoring data cannot be considered to be representative of regional concentrations.

The Chula Vista monitoring site is only 9 km away from PPEC, with no intervening geological features that would affect the regional dispersion of pollutants. Data from this station represent regional background plus direct impacts from sources close to it. Monitored values from this site must be at least as high as the regional background (by definition, it is impossible for valid monitoring data to be below the regional background), and may be higher than the background by virtue of local impacts. We propose to use this station's data to represent regional background data, and to explicitly superimpose the impacts of significant nearby non-project sources. We do not propose to adjust monitoring data to account for direct impacts from those, even though EPA guidance permits such an adjustment.

Our proposed methodology will therefore compare the national ambient air quality standard to the sum of regional background, direct impacts to the monitoring site, modeled impacts from our project, and modeled impacts from nearby non-project sources. Since the difference between the Chula Vista data and the Otay Mesa data is the degree to which they are impacted by local sources, and not the regional background, use

of the more heavily impacted Otay Mesa data would not be consistent with EPA guidance.

### Conclusion

Because the compliance demonstration is in the critical path for the PSD permit review, we request expeditious approval of our proposed modeling demonstration.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Steve Hill

cc: Steve Moore, SDAPCD

Eric Solorio, CEC

Dave Jenkins, Apex Power John McKinsey, Stoel Rives

# Attachment 1

Dynegy South Bay

# Attachment 2

# SDAQMD Emission Inventory Facilities with NOx or PM10 Emissins > 5 TPY





Greg Cox District 1
Dianne Jacob District 2
Pam Slater-Price District 3
Ron Roberts District 4
Bill Horn District 5

December 29, 2010

IMPORTANT NOTICE

LEONARD J CIGAINERO SOUTH BAY POWER PLANT - DYNEGY 990 BAY BLVD CHULA VISTA CA 91911

EQUIPMENT ADDRESS: SAME AS ABOVE

You have advised the District that your open permit applications (PTO's, Title IV and Title V) will not be used again. Therefore, your permits and open applications have been retired on December 29, 2010.

If you wish to reinstate your permit it must be done within 6 months of the retirement date. To reinstate the permit, contact Permit Processing at (858) 586-2600.

Please be advised that any operation of the equipment after the retirement date described in the aforementioned Permit to Operate is a misdemeanor, which may be subject to substantial fines or penalties. If the equipment is observed in use by the District appropriate legal action will be undertaken.

A new Permit to Operate may be applied for by submitting an application and the necessary fee to the Air Pollution Control District.

If you have any question regarding this matter please call Permit Processing at (858) 586-2600.

JAYNE HURLEY

Supervisor, Permit Processing

JH:cg

cc: Site File

Compliance Reading File

I.D.#00197/ Sector R





Greg Cox District 1
Dianne Jacob District 2
Pare Slater-Price District 3
Ron Roberts District 4
Bill Hore District 5

December 28, 2010

IMPORTANT NOTICE

LEONARD J CIGAINERO SOUTH BAY POWER PLANT - DYNEGY 990 BAY BLVD CHULA VISTA CA 91911

**EQUIPMENT ADDRESS: SAME AS ABOVE** 

You have advised the District that your South Bay Title V permit; Units 1 & 2 combustion turbine with Permit to Operate No(s), 1201, 1202, 1276, 921148, 940438, 940439, 974001 will not be used again. Therefore, your permit has been retired on December 28, 2010.

If you wish to reinstate your permit it must be done within 6 months of the retirement date. To reinstate the permit, contact Permit Processing at (858) 586-2600.

Please be advised that any operation of the equipment after the retirement date described in the aforementioned Permit to Operate is a misdemeanor, which may be subject to substantial fines or penalties. If the equipment is observed in use by the District appropriate legal action will be undertaken.

A new Permit to Operate may be applied for by submitting an application and the necessary fee to the Air Pollution Control District.

If you have any question regarding this matter please call Permit Processing at (858) 586-2600.

JAYNE HURLEY

Supervisor, Permit Processing

JH:cg

cc: Site File

Compliance

Reading File

LD.# 00197/ Sector R

### 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 PIO PICO ENERGY CENTER, LLC

Docket No. 11-AFC-1 PROOF OF SERVICE (Revised 3/20/12)

# Pio Pico Energy Center, LLC Applicant's Additional Information to EPA re PSD Permit Applicant (Nearby Sources) dated July 6, 2011

#### **APPLICANT**

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grchandler@apexpowergroup.com

David Jenkins, Project Manager Pio Pico Energy Center, LLC 1293 E. Jessup Way Mooresville, IN 46158 djenkins@apexpowergroup.com

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### **INTERESTED AGENCIES**

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e-mail service preferred
e-recipient@caiso.com

### **PETITIONERS**

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# ENERGY COMMISSION - PUBLIC ADVISER

Jennifer Jennings
Energy Commission Public Adviser
e-mail service preferred
publicadviser@energy.state.ca.us

### **DECLARATION OF SERVICE**

1, Judith M. Warmuth, declare that on June 22, 2012:
I deposited copies of the aforementioned document and, if applicable, a disc containing the aforementioned document in the United States mail at 500 Capitol Mall, Suite 1600, Sacramento, California 95814, with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list herein and consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210.
<u>OR</u>
I transmitted the document(s) herein via electronic mail only pursuant to California Energy Commission Standing Order re Proceedings and Confidentiality Applications dated November 30, 2011. All electronic copies were sent to all those identified on the Proof of Service list herein and consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210.
OR
On the date written above, I placed a copy of the attached document(s) in a sealed envelope, with delivery fees paid or provided for, and arranged for it/them to be delivered by messenger that same day to the office of the addressee, as identified on the Proof of Service list herein and consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210.
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.  Judith M. Warmuth