

California Energy Commission

DOCKETED 12-AFC-02

TN # 69920

MAR. 14 2013

MELISSA A. FOSTER Direct (916) 319-4673 mafoster@stoel.com 500 Capitol Mall, Suite 1600 Sacramento, CA 95814 main 916.447.0700 fax 916.447.4781 www.stoel.com

March 14, 2013

VIA EMAIL

Ms. Felicia Miller, Siting Project Manager California Energy Commission 1516 Ninth Street Sacramento, CA 95814

Re: Huntington Beach Energy Project (12-AFC-02)
Applicant's Correspondence Related to Air Quality

Dear Ms. Miller:

On behalf of Applicant AES Southland Development, LLC, please find enclosed herewith for docketing Applicant's correspondence between Applicant's consultants, Commission Staff, and the South Coast Air Quality Management District regarding the topic of air quality as such relates to the Huntington Beach Energy Project. Due to file size, attachments to the correspondence (air quality data) will be docketed under separate cover. Applicant is more than happy to provide any party a copy of the disk upon request.

Respectfully submitted,

Melissa A. Foster

MAF:jmw Enclosure

cc: Proof of Service List

ibaker@agmd.gov From:

Sent: Thursday, February 28, 2013 3:46 PM

To: John.Frohning@CH2M.com

Elyse.Engel@ch2m.com; Jerry.Salamy@CH2M.com; slee@aqmd.gov; Cc:

Benjamin.Beattie@CH2M.com; tchico@aqmd.gov; CPerri@aqmd.gov

RE: Costa Mesa Meteorological Data Questions Subject:

Attachments: CostaMesa for Consultant Revised.zip

Hi John,

We looked into your question regarding the wind speeds and found that the wind speeds we have in our input files are in meters per second, not miles per hour.

Attached are the files you requested. Please let me know if you have further questions.

Jillian Baker, Ph.D. South Coast AOMD 21865 Copley Drive, Diamond Bar, CA 91765 Direct: 909.396.3176

From: John.Frohning@CH2M.com [mailto:John.Frohning@CH2M.com]

Sent: Tuesday, February 26, 2013 5:54 PM

To: Jillian Baker

Cc: Elyse.Engel@ch2m.com; Jerry.Salamy@CH2M.com; Sang-Mi Lee; Benjamin.Beattie@CH2M.com

Subject: RE: Costa Mesa Meteorological Data Questions

Hi Jillian.

I am just following up on our conversation on Tuesday (2/19) of last week and checking on the status of the revised Costa Mesa AERMET files (including the Costa Mesa raw input data for Stage 1 of AERMET).

Let me know if you have any questions.

Thanks, John Frohning Air Quality Specialist CH2M Hill

425-292-3087 1100 112th Ave. NE Suite 400 Bellevue, WA 98004

From: Jillian Baker [mailto:jbaker@agmd.gov] Sent: Tuesday, February 19, 2013 8:57 AM

To: Engel, Elyse/SJC

Cc: Frohning, John/SEA; Beattie, Benjamin/SAC; Salamy, Jerry/SAC; McGregor, Keith/SAC; Tom Chico; Chris Perri; Sang-

Mi Lee

Subject: RE: Costa Mesa Meteorological Data Questions

** WARNING ** This email contains a compressed file (e.g., ZIP), which is a file type often used to package & deliver viruses. Be VERY suspicious of ALL file attachments--ESPECIALLY if you do not know the sender. If you're in doubt about the legitimacy of this email, then DO NOT open the file attachment(s) before verifying with the sender.

Report suspicious emails to TAC, or your Regional IT Helpdesk if not supported by TAC.

File Name(s): CostaMesa_for_Consultant.zip

File Type(s): compressed/zip

The original message text is below.

Hi Elyse,

Attached are the files you requested.

Jillian Baker, Ph.D. South Coast AQMD 21865 Copley Drive, Diamond Bar, CA 91765 Direct: 909.396.3176

From: Elyse.Engel@ch2m.com [mailto:Elyse.Engel@ch2m.com]

Sent: Wednesday, February 13, 2013 9:22 PM

To: Jillian Baker

Cc: John.Frohning@CH2M.com; Benjamin.Beattie@CH2M.com; Jerry.Salamy@CH2M.com; Keith.McGregor@CH2M.com;

Tom Chico; Chris Perri

Subject: RE: Costa Mesa Meteorological Data Questions

Hi Jillian,

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- Raw data used for AERMET Stage 1 processing

Please let me know if you have any questions about this additional request.

Thanks, Elyse

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To: Engel, Elyse/SJC

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This file is the same file as the one which was previously provided to you, with a change in the station location, which does not affect the modeled results. You should already have the csta5.pfl file to use.

Response to #10.

As you are aware, the 3 years of met data and ozone data posted on our website was sufficient for use in non-PSD permitting projects. As indicated on our website, we request that applicants contact us for the most recent and updated met data plus ozone or NO2 data for all PSD projects. The method used for filling-in missing ozone data for purposes of Tier 3 NO2 modeling was updated in response to the new federal 1-hour NO2 standard and has been used on previous PSD projects within the District. The procedure is as follows:

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Instead, we extracted the maximum value for each hour of the day and month of the year. Thus, there were 12 sets (representing each month of the year) of 24 hourly (representing the 24 hours in the day) ozone values. In this manner, the diurnal and seasonal ambient ozone patterns are preserved. So missing ozone at 1 a.m. in December would be filled in with the maximum 1 a.m. ozone concentration for all the Decembers in the modeling period. Similarly missing ozone at 2 p.m. in July would be filled in with the maximum 2 p.m. ozone concentration for all the Julys in the modeling period.

Please let me know if you have further questions.

Jillian Baker, Ph.D. South Coast AQMD 21865 Copley Drive, Diamond Bar, CA 91765 Direct: 909.396.3176

From: Elyse.Engel@ch2m.com [mailto:Elyse.Engel@ch2m.com]

Sent: Wednesday, February 06, 2013 7:49 AM

To: Jillian Baker

Cc: John.Frohning@CH2M.com; Benjamin.Beattie@CH2M.com; Jerry.Salamy@CH2M.com; Keith.McGregor@CH2M.com

Subject: Costa Mesa Meteorological Data Questions

Hi Jillian,

Thank you for your time yesterday to discuss the revised 5-year Costa Mesa meteorological dataset processed with the updated version of AERMET (version 12345). We just wanted to follow-up on our observations from comparing the revised dataset to the original 3-year dataset. As discussed, we also reviewed the revised Ozone data and had a question about the inconsistencies between the previous 3-year dataset and the new 5-year dataset. We understand that many of the questions about the differences could be accounted for by using the new version of AERSURFACE; however, they are repeated below for verification.

Please review the following questions / comments and let us know if you would like to discuss in more detail:

- 1. SFC Files: The revised 5-year dataset processed with version 12345 has a coordinate inconsistent with the Costa Mesa station location. The coordinate included appears to be for the Crestline station. Please verify that Stages 1 and 3 of AERMET were preprocessed with the correct station location for Costa Mesa.
- 2. SFC Files: The surface roughness length is not consistent between the old and new datasets. We understand this may be an artifact of using the updated version of AERSURFACE, but please confirm. Please also confirm that the correct coordinate for the Costa Mesa station was used in AERSURFACE.
- 3. SFC Files, Albedo: The albedo between the old and new datasets do not match for many hours. Again, this may be an artifact of using the updated version of AERSURFACE, but please confirm.
- 4. SFC/PFL Files, Wind Direction: It appears that the updated dataset rounded wind direction to the nearest degree. Why was AERMET version 12345 run with different raw surface data? Please note, however, that not all wind directions appear to be rounded to the nearest degree as there are some cases when there is a value after the decimal point (example: January 5, 2005, hour 4).
- 5. SFC/PFL Files, Wind Speed: Again, it appears that there has been some rounding to the nearest tenth of a m/sec; however, there are some cases where the wind speed differences between the old and new datasets differ by more than a tenth of a m/sec. Why was the valid raw data input into AERMET different for the new dataset?
- 6. Wind Speed/Wind Direction: What are the starting thresholds for both the wind speed and wind direction sensor? Based on our conversation, many of the previously identified 'calms' were now modified to a wind speed of 0.28 m/sec. Please confirm this value is the greater of the wind direction or wind speed sensor starting thresholds.
- 7. SFC File, Missing Data Inconsistencies: In contrast to comment 6, there are now some instances when data previously identified as valid are now considered missing/invalid (example: January 11, 2005, hours 12, 13, 14, and 15). Please confirm.
- 8. SFC File, Pressure: The pressure values between the old and new datasets vary greatly. Please verify the difference
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We look forward to hearing from you.

Thanks, Elyse and John

Elyse Engel Staff Engineer Environmental Services Business Group

CH2M HILL 1737 North First Street, Suite 300 San Jose, California 95112 Direct 408.436.4936 x37432 Fax 408.436.4829 elyse.engel@ch2m.com From: John.Frohning@CH2M.com

Sent: Thursday, February 28, 2013 4:29 PM

To: jbaker@aqmd.gov

Cc: Elyse.Engel@ch2m.com; Jerry.Salamy@CH2M.com; slee@aqmd.gov;

Benjamin.Beattie@CH2M.com; tchico@aqmd.gov; CPerri@aqmd.gov

Subject: RE: Costa Mesa Meteorological Data Questions

Thanks Jillian,

We have reviewed this revised 5-year AERMET dataset for Costa Mesa. Updating the coordinate in AERMET has corrected the parameters in the SFC file to be consistent with the Costa Mesa station. We will move forward with this revised 5-year meteorological dataset for the AERMOD analysis.

Thanks for taking the time to address our comments on the initial dataset. Have a great afternoon!

Regards, John Frohning Air Quality Specialist CH2M Hill

425-292-3087 1100 112th Ave. NE Suite 400 Bellevue, WA 98004

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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 HUNTINGTON BEACH ENERGY PROJECT

Docket No. 12-AFC-02

PROOF OF SERVICE (Revised 03/07/2013)

SERVICE LIST:

APPLICANT

AES Southland, LLC Stephen O'Kane Jennifer Didlo 690 Studebaker Road Long Beach, CA 90803 stephen.okane@aes.com jennifer.didlo@aes.com

APPLICANT'S CONSULTANTS

CH2MHill
Robert Mason
Project Manager
6 Hutton Centre Drive, Suite 700
Santa Ana, CA 92707
robert.mason@CH2M.com

APPLICANT'S COUNSEL

Melissa A. Foster Stoel Rives, LLP 500 Capitol Mall, Suite 1600 Sacramento, CA 95814 mafoster@stoel.com

INTERVENOR

Jason Pyle 9071 Kapaa Drive Huntington Beach, CA 92646 jasonpyle@me.com

INTERESTED AGENCIES

California ISO e-recipient@caiso.com

INTERESTED AGENCIES (Cont'd.)

California Coastal Commission Tom Luster 45 Fremont Street, Suite 2000 San Francisco, CA 94105-2219 tluster@coastal.ca.gov

California State Parks
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Brian Ketterer
21601 Pacific Coast Highway
Huntington Beach, CA 92646
bketterer@parks.ca.gov

City of Huntington Beach
Planning & Building Department
Jane James
Scott Hess
Aaron Klemm
2000 Main Street, 3rd floor
Huntington Beach, CA 92648
jjames@surfcity-hb.org
shess@surfcity-hb.org
aaron.klemm@surfcity-hb.org

City of Huntington Beach
City Council
Cathy Fikes
Johanna Stephenson
2000 Main Street, 4th floor
Huntington Beach, CA 92648
cfikes@surfcity-hb.org
johanna.stephenson@surfcity-hb.org.

INTERESTED AGENCIES (Cont'd.)

Santa Ana Regional Water Quality Board Gary Stewart 3737 Main Street, Suite 500 Riverside, CA 92501-3339 gstewart@waterboards.ca.gov

Huntington Beach Wetlands Conservancy Jack Kirkorn, Director 21900 Pacific Coast Highway Huntington Beach, CA 92646 ifk0480@aol.com

ENERGY COMMISSION STAFF

Felicia Miller Project Manager felicia.miller@energy.ca.gov

Kevin W. Bell Staff Counsel kevin.w.bell@energy.ca.gov

<u>ENERGY COMMISSION –</u> <u>PUBLIC ADVISER</u>

Blake Roberts Assistant Public Adviser publicadviser@energy.ca.gov

COMMISSION DOCKET UNIT

California Energy Commission –
Docket Unit
Attn: Docket No. 12-AFC-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

OTHER ENERGY COMMISSION PARTICIPANTS (LISTED FOR CONVENIENCE ONLY):

After docketing, the Docket Unit will provide a copy to the persons listed below. <u>Do not</u> send copies of documents to these persons unless specifically directed to do so.

ANDREW McALLISTER
Commissioner and Presiding Member

KAREN DOUGLAS
Commissioner and Associate Member

Susan Cochran Hearing Adviser

*Hazel Miranda Adviser to Commissioner McAllister

David Hungerford Adviser to Commissioner McAllister

Patrick Saxton Adviser to Commissioner McAllister

Galen Lemei Adviser to Commissioner Douglas

Jennifer Nelson Adviser to Commissioner Douglas

Eileen Allen Commissioners' Technical Adviser for Facility Siting

DECLARATION OF SERVICE

I, Judith M. Warmuth, declare that on March 14, 2013, I served and filed copies of the attached Applicant's Correspondence Related to Air Quality dated March 14, 2013. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: http://www.energy.ca.gov/sitingcases/huntington_beach_energy/index.html.

The document has been sent to the other parties on the Service List above in the following manner:

(Check one)

For service to all other	parties and filing	g with the Docket Unit	at the Energy	Commission:
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×	I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; OR
	Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: March 14, 2013

Judith M. Warmuth

Juin M. Warmen