



455 Capitol Mall Suite 350
Sacramento CA 95814
Tel • 916.441.6575
Fax • 916.441.6553

California Energy Commission

DOCKETED
09-AFC-6C

TN # 70465

APR. 25 2013

April 25, 2013

California Energy Commission
Dockets Unit
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: NEXTERA BLYTHE SOLAR ENERGY CENTER LLC'S ERRATA TO AIR QUALITY FOR THE REVISED PETITION TO AMEND BLYTHE SOLAR POWER PROJECT DOCKET NO. (09-AFC-6C)

Enclosed for filing with the California Energy Commission is the electronic version of **NEXTERA BLYTHE SOLAR ENERGY CENTER LLC'S ERRATA TO AIR QUALITY FOR THE REVISED PETITION TO AMEND**, for the Blythe Solar Power Project (09-AFC-6C).

Sincerely,

Marie Fleming

4.2.3 Summary of Operations and Maintenance Emissions

The methodology for calculating criteria pollutant emissions during operations is described below in Section 4.2.3.1. The estimated emissions from O&M of the Modified Project are presented in Section 4.2.2.3 and the detailed emissions calculations are provided in Appendix E.

4.2.3.1 O&M Emissions Calculation Methodology

As with vehicle emissions during the construction phase, emissions from motor vehicles during the operation phase were calculated by multiplying VMT by emission factors calculated with EMFAC2011 for 2014 in Riverside County. Fugitive dust emissions for vehicles traveling on unpaved roads and paved roads were calculated by multiplying VMT on unpaved and paved roads by emission factors calculated using equations in EPA's AP-42.

4.2.3.2 O&M Emissions

The maximum daily and annual O&M emissions for the Modified Project are shown in Tables 4.2-4 and 4.2-5, respectively. A comparison between the maximum daily and annual on-site emissions generated during O&M of the Modified Project and the Approved Project is shown in Table 4.2-6.

**TABLE 4.2-4
MAXIMUM DAILY O&M EMISSIONS SUMMARY**

Source	Emissions (lb/day)					
	CO	ROG	NO _x	SO _x	PM ₁₀	PM _{2.5}
On-Site Emissions						
On-site Equipment ^(a)	0.7	0.1	1.03	0.0	0.0	0.0
On-site Motor Vehicle Exhaust	0.1	0.0	0.07	0.0	0.0	0.0
On-site Vehicle Fugitive Dust	--	--	--	--	48.6	4.9
Total On-site Emissions	0.8	0.1	1.1	0.0	48.6	4.9
Offsite Emissions						
Total Offsite Emissions ^(b)	7.0	0.9	2.2	0.0	0.6	0.2

NOTES:

^(a) On-site equipment for the Modified Project consists of a 30 hp portable light plant generator.

^(b) Offsite emissions reflect employee and delivery truck on-road emissions within the Mojave Desert Air Basin.

**TABLE 4.2-5
MAXIMUM ANNUAL O&M EMISSIONS SUMMARY**

<u>Source</u>	Emissions (tons/year)					
	CO	ROG	NO _x	SO _x	PM ₁₀	PM _{2.5}
On-site Emissions						
On-site Equipment ^(a)	0.0	0.0	0.1	0.0	0.0	0.0
On-site Motor Vehicle Exhaust	0.0	0.0	0.0	0.0	0.0	0.0
On-site Vehicle Fugitive Dust	--	--	--	--	6.7	0.7
Total On-site Emissions	0.1	0.0	0.1	0.0	6.7	0.7
Offsite Emissions						
Total Offsite Emissions^(b)	0.9	0.1	0.1	0.0	0.1	0.0

NOTES:

^(a) On-site equipment for the Modified Project consists of a 30 hp portable light plant generator.

^(b) Offsite emissions reflect employee and delivery truck on-road emissions within the Mojave Desert Air Basin.

As shown in Table 4.2-6, the O&M emissions for the Modified Project are only a fraction of those from the Approved Project. A breakdown of the on-site equipment and maintenance vehicle emissions (primary associated with the mirror washing) is provided for the Approved Project, and a further breakdown can be found in the CEC's Revised Staff Assessment (CEC 2010). The lower on-site emissions of the Modified Project are primarily due to the elimination of the equipment in each of the power blocks at the facility and the fact that the intensive mirror washing to support solar thermal technology is no longer needed.

Similar to the construction phase, modeling during O&M was not redone for the Modified Project. As shown in Table 4.2-6, the daily and annual emissions from both the stationary equipment and the maintenance vehicles for the Modified Project are less than 9 percent (in most cases less than 1 percent) of the emissions for the Approved Project. The modeling analysis for the Approved Project from O&M emissions resulted in similar impacts to those discussed above for the construction phase, and like construction, with the substantially reduced emissions from the Modified Project, impacts would remain less than significant with the implementation of the mitigation measures as required by Commission Conditions of Certification **AQ-SC6** and **AQ-SC7**.

**TABLE 4.2-6
COMPARISON OF ON-SITE O&M EMISSIONS FOR MODIFIED VERSUS APPROVED PROJECT**

	Emissions					
	CO	ROG	NO _x	SO _x	PM ₁₀	PM _{2.5}
Maximum Daily O&M Emissions (lb/day)						
Total Modified Project (Table 4.2-4)	0.8	0.1	1.1	0.0	48.6	4.9
<i>Total Approved Project On-site Equipment^{(a)/(b)}</i>	<i>143.5</i>	<i>219.6</i>	<i>145.5</i>	<i>0.64</i>	<i>25.8</i>	<i>25.6</i>
<i>Total Approved Project Maintenance Vehicles (Exhaust and Fugitive Dust)^(b)</i>	<i>1.34</i>	<i>0.23</i>	<i>2.25</i>	<i>0.02</i>	<i>809.8</i>	<i>81.1</i>
<i>Total Approved Project^(b)</i>	<i>144.8</i>	<i>219.9</i>	<i>147.8</i>	<i>0.7</i>	<i>835.6</i>	<i>106.7</i>



**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**

**AMENDMENT
FOR THE BLYTHE SOLAR POWER PROJECT**

Docket No. 09-AFC-6C

**PROOF OF SERVICE
(EST. 4/11/2013)**

SERVICE LIST:

APPLICANT

NextEra Energy Resources
Dan Neville
Project Director, Development
505 14th Street, Suite 310
Oakland, CA 94616
daniel.neville@nee.com

APPLICANT'S COUNSEL

Scott Galati, Esq.
Marie Fleming
Galati/Blek, LLP
455 Capitol Mall, Suite 350
Sacramento, CA 95814
sgalati@gb-llp.com
mfleming@gb-llp.com

APPLICANT'S CONSULTANT

Tetra Tech, Inc.
Tricia Bernhardt
143 Union Boulevard, Suite 1010
Lakewood, CO 80228
tricia.bernhardt@tetrattech.com

**INTERVENOR FROM PREVIOUS
PROCEEDING (09-AFC-06)**

California Unions for Reliable Energy
(CURE)
c/o: Tanya A. Gulesserian
Elizabeth Klebaner
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gate Way Boulevard, Suite 1000
South San Francisco, CA 94080
tgulesserian@adamsbroadwell.com
eklebaner@adamsbroadwell.com

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

Bureau of Land Management
Desert District Office
Jeff Childers
22835 Calle San Juan de Los Lagos
Moreno Valley, CA 92553
jchilders@blm.gov

United States Fish and Wildlife Service
Tera Baird
777 East Tahquitz Canyon Way
Suite 208
Palm Springs, CA 92262
Tera_baird@fws.gov

California Department of Fish and
Game, Inland Desert Region
Magdalena Rodriguez
3602 Inland Empire Boulevard
Suite C-220
Ontario, CA 91764
mrodriguez@dfg.ca.gov

Riverside County Airport
Land Use Commission
John Guerin
Riverside County Administrative Center
4080 Lemon Street, 14th Floor
Riverside, CA 92501
jguerin@rctlma.org

ENERGY COMMISSION STAFF

Mary Dyas
Project Manager
mary.dyas@energy.ca.gov

Jared Babula
Staff Counsel
jared.babula@energy.ca.gov

**ENERGY COMMISSION –
PUBLIC ADVISER**

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

COMMISSION DOCKET UNIT

California Energy Commission
- Docket Unit
Attn: Docket No. 09-AFC-6C
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. Do not send copies of documents to these persons unless specifically directed to do so.

KAREN DOUGLAS
Commissioner and Presiding Member

ROBERT B. WEISENMILLER
Chair and Associate Member

Raoul Renaud
Hearing Adviser

Galen Lemei
Adviser to Presiding Member

Jennifer Nelson
Adviser to Presiding Member

Sekita Grant
Adviser to Associate Member

Eileen Allen
Commissioners' Technical
Adviser for Facility Siting

DECLARATION OF SERVICE

I, Marie Fleming, declare that on, April 25, 2013, I served and filed copies of the attached **NextEra Blythe Solar Energy Center LLC's Errata to Air Quality for the Revised Petition to Amend**, dated April 25, 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/blythe_solar/.

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

(Check one)


For service to all other parties and filing with the Docket Unit at the Energy Commission:

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 persons 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: April 25, 2013



Marie Fleming