CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

December 4, 2006

DOCKET
01-AFC-17C
DATE DEC 4 2006
RECD. JAN 2 2007

Mr. Dana Petrin
Compliance Manager
Inland Empire Energy Center, LLC
PO Box 1240
26226 Antelope Road
Romoland, CA 92585

SUBJECT: Inland Empire Energy Center Project (01-AFC-17C)
Air Quality Data Requests for
Amendment Petition Dated September 22, 2006

Dear Mr. Petrin:

California Energy Commission staff requests that Inland Empire Energy Center, LLC, supply the information specified in the enclosed air quality data requests. The information requested is necessary to understand if the proposed changes would result in significant environmental effects. If you are unable to provide the information requested in the data requests or object to providing it, please notify me at your earliest convenience stating your objection.

If you have any questions, do not hesitate to call me at (916) 654-4545.

Sincerely,

Connie Bruins
Compliance Project Manager
Energy Facilities Siting Division

Enclosure: Air Quality Data Requests

Technical Area: Air Quality
Author: Brewster Birdsall

BACKGROUND

Proposed Revisions to AQ-18

The proposed revisions to COC AQ-18 would allow elevated emissions during "combustor-tuning," an activity defined by the project owner in the proposed revisions. Staff views combustor-tuning as an activity that must be conducted expeditiously and with minimum effects to emissions. Because elevated emissions would be allowed during combustor-tuning, the time spent by the project owner in combustor-tuning mode must be limited, and written records of combustor-tuning activities should be maintained. The proposed revisions to COC AQ-18 are inadequate because they do not include any time limit or recordkeeping on combustor-tuning activities. This is especially important because the turbine manufacturer, who would dictate when tuning should occur, and the IEEC project owner are one in the same.

DATA REQUEST

1. Please confirm that the monthly total limit of 31 hours in startup/shutdown mode from COC AQ-18 will not be exceeded by the <u>combined</u> number of hours in combustor-tuning activities and in startup/shutdown mode. If the combined duration for startup/shutdown and combustor-tuning activities cannot be limited to less than 31 hours per month, please propose permit condition language that would establish a time limit for these combined activities.

2. Please identify approximately how many hours per month could be devoted to combustor-tuning activities and how the time of beginning and ending these activities would be determined.

3. Please propose permit condition language to implement recordkeeping of combustor-tuning activities.

BACKGROUND

Proposed Revisions to AQ-32

The proposed revisions to COC AQ-32 would remove the requirement to conduct source tests for SOx, VOC, and PM10 from the auxiliary boiler. The petition describes the auxiliary boiler as a "relatively minor source of emissions at this facility," but staff believes that relaxing testing and monitoring requirements generally results a significant change in permit conditions. The auxiliary boiler would be subject to the emission limits in COC AQ-44 and Attachment Air Quality 1 – AQ-SC16. With the proposed revisions, there would be no way of determining whether the source complies with these limits. Staff considers the proposed revisions to be inadequate because without source testing or some other method of monitoring, there would be no way to verify compliance of the auxiliary boiler emission limits established by the South Coast Air Quality Management District (SCAQMD).

DATA REQUEST

4. Please propose permit condition language to verify and assure compliance of auxiliary boiler emissions with the VOC emission limit in AQ-44 and in the Best Available Control Technology requirements, as shown in Attachment Air Quality 1 – AQ-SC16.

5. Please propose permit condition language to verify and assure compliance of auxiliary boiler emissions with the PM10 emission limits of the Best Available Control Technology requirements and SCAQMD Rule 409, as shown in Attachment Air Quality 1 – AQ-SC16.