



GE Energy

John Gates
Commercial Manager

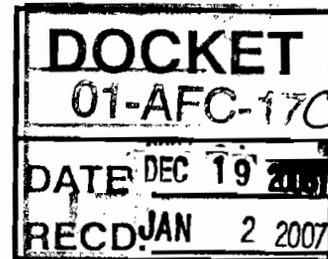
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December 19, 2006

01-AFC-17C

Ms. Connie Bruins
Compliance Project Manager
1516 Ninth Street, MS-2000
Sacramento, CA 95814



Re: Air Quality Amendment Data Response

Dear Ms. Bruins,

Please find enclosed IEEC responses to the Commission's December 4, 2006 data request related to the air quality amendment submitted on September 22, 2006.

Should you have any question please feel free to contact Dana Petrin, EHS Manager, at (951) 928-6952 or myself at (951) 928-6905.

Sincerely,

John Gates
Commercial Manager

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

General Response: There will generally be two types of tuning activities over the life of the plant. The first is tuning which occurs during commissioning. The second is tuning following major maintenance activities on the gas turbine combustion systems; none of these are currently scheduled for the 7H. IEEC would expect this maintenance tuning to be on an infrequent basis.

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 combined 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.

Response: The 31 hours in AQ-18 was intended to apply only to startup/shutdowns and not to tuning. Tuning during commissioning will entail a preliminary tuning of the turbines as soon as possible after first fire and then frequent adjustments and gas turbine tests and ultimately final tuning over the entire commissioning period of approximately four to six months for Gas Turbine Unit 1, and, two months for Gas Turbine Unit 2. Turbine operations during this time will be intermittent. IEEC has accounted for the tuning and other estimated commissioning emissions in its first year emission estimates and monthly and annual emission limits as well as a maximum of 6 hours per day for tuning. (see conditions AQ-13, AQ-27, and AQ-18, respectively). These existing limits will restrict the duration of elevated emissions while allowing needed flexibility in tuning the gas turbines.

After completion of the commissioning period, tuning following any major maintenance activities on the gas turbine combustion systems or other unscheduled event may last for several days of intermittent operation. The actual time during which emissions may be elevated, and the extent of the increase, will depend on many variables, and an hours limit is not appropriate. Emission estimates and monthly and annual emission limits for the second and subsequent years of operation will restrict the duration of elevated emissions. The maximum of 6 hours per day for tuning will also continue to be in effect. IEEC believes that these existing air emission limits are sufficient.

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.

Response: Gas turbine tuning is a distinct activity performed by qualified engineers and technicians. It would be scheduled and documented in the plant's logs. As noted above, it is not possible to predict in advance the number of hours per month that may be associated with combustor tuning activities; however, these activities will be contained within the applicable monthly and annual emission limits.

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

Response: As discussed above, IEEC has accounted for the tuning and other estimated commissioning emissions in its emission estimates and monthly and annual emission limits. These existing limits will restrict the duration of elevated emissions while allowing flexibility in plant operation. Establishing an additional recordkeeping requirement will have no substantive emissions benefit and add an unnecessary burden on IEEC. IEEC believes that the existing monthly and annual emissions recordkeeping requirements are sufficient.

BACKGROUND

Proposed Revisions to AQ-32

The proposed revisions to COC AQ-32 would remove the requirement to conduct source tests for SO_x, 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.

Response: The conclusion that VOC/PM₁₀ compliance testing is not needed because an auxiliary boiler is a relatively minor emission source is not unique to this project. The CEC approval for the East Altamont Energy Center (01-AFC-04) did not include VOC or PM₁₀ compliance testing requirements for the 129 MMBtu/hr auxiliary boiler associated with this project. Since the auxiliary boiler is not equipped with add-on VOC/PM₁₀ emission controls, good combustion practice is the method used to control VOC/PM₁₀ emissions. Because the auxiliary boiler will be equipped with a CO continuous emissions monitoring system and since CO emissions are a good indicator of proper combustion, monitoring CO will ensure that proper combustion practices are followed for the auxiliary boiler. Therefore, there is no need to include a VOC or PM₁₀ compliance testing requirement for the auxiliary boiler. We further believe that it would be inappropriate for the CEC to impose such a requirement when the SCAQMD has expressly determined that such testing is not required for this facility.

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.

Response: See AQ Response 4.