

DOCKET
09-AFC-9

DATE MAR 19 2010

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March 19, 2010

Eric Solorio
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Ridgecrest Solar Power Project (RSPP), Docket No. 09-AFC-9, Comments on Preliminary Determination of Compliance dated March 18, 2010 and Construction and Operations Modeling Files.

Dear Mr. Solorio:

As requested, attached please find Ridgecrest Solar I, LLC's Comments on Preliminary Determination of Compliance dated March 18, 2010 and Construction and Operations modeling files.

If you have any questions on this information, please feel free to contact me at 510-809-4662 (office) or 949-433-4049 (cell).

Sincerely,



Billy Owens
Director, Project Development



**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 *RIDGECREST SOLAR
POWER PROJECT***

Docket No. 09-AFC-9

**PROOF OF SERVICE
(Revised 3/2/2010)**

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DECLARATION OF SERVICE

I, Elizabeth Copley, declare that on March 19, 2010, I served and filed copies of the attached Ridgecrest Solar Power Project (Docket No. 09-AFC-9) Comments on Preliminary Determination of Compliance dated March 18, 2010 and Construction and Operations Modeling Files. The original documents, filed with the Docket Unit, are accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[\[http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest\]](http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest).

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery;
- by delivering on this date one paper copy and one electronic copy on CD, for mailing with the United States Postal Service with first-class postage thereon fully prepaid to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

- sending an original paper copy and one electronic copy on CD, mailed respectively, to the address below (preferred method);

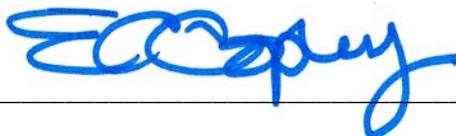
OR

- depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 09-AFC-9
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.



March 18, 2010

Mr. Glen Stephens
Kern County Air Pollution Control District
2700 "M" Street, Suite 302
Bakersfield, CA 93301-2370

Re: Preliminary Determination of Compliance, Ridgecrest Solar Power Project

Dear Mr. Stephens,

On behalf of Ridgecrest Solar I, LLC, Solar Millennium, LLC has reviewed the Preliminary Determinations of Compliance (PDOC) that the Kern County Air Pollution Control District (KCAPCD or District) proposes to issue to the Ridgecrest Solar Power Project (RSPP).

Overall we are pleased with the PDOC and have very few comments. However, we believe that revisions and clarifications are appropriate in several instances. Our comments are organized by application number.

Where appropriate, the requested revisions are illustrated using underline format for additional language and ~~strikethrough~~ format for text that should be deleted.

Application No. 0368001 for 35 MMBtu/hr Propane Fueled Boiler

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Under the section titled "Compliance Testing Requirements", paragraphs two and three are both related to initial performance testing for NO_x, and the requirements are not consistent. As the underlying rule allows for an exemption from testing for units with heat input less than 90,000 therms, we believe that paragraph two should be deleted. We request that the section be modified as shown below:

Boiler stack shall be equipped with sampling ports (in accordance with California Air Resources Board Standards), sampling platform, access to sampling platforms, and utilities for sampling equipment to perform source-sampling operations. (Rule 108.1)

~~Initial compliance with NO_x emission limits shall be verified by compliance test utilizing test methods listed in Subsection VI.B of Rule 425.2 within 60-days of District initial start-up inspection. (Rule 210.1)~~

Initial testing for Rule 425.2 shall commence within 60-days after boiler's annual heat input attains or exceeds 90,000 therms (9,000-MMBtu). Boiler shall be tested in accordance with test methods listed in Subsection VI.B and in accordance to schedule in Subsection VI.C of Rule 425.2. (Rule 425.2)

Should inspection reveal conditions indicative of non-compliance, compliance with any emission limitations shall be verified, within 60 days of District request. Test results shall be submitted to KCAPCD within 30 days after test completion. (Rule 108.1 and 210.1)

The emission limits listed in the PDOC don't match the emissions presented in the AFC for the boiler. We have verified the emission calculations and assumptions used to determine emissions and we are confident that the emissions presented in the AFC are correct. Also, as the ambient air quality modeling that was conducted for the AFC is based on the emissions from this permit unit, we would like to have the emissions consistent between the two documents. We request that the emission limits be modified as shown below:

Particulate Matter (PM ₁₀):	0.27 <u>0.35</u>	lb/hr
	4.02 <u>2.01</u>	lb/day
	0.67 <u>0.28</u>	tpy
Sulfur Oxides (SO _x as SO ₂):	0.04 <u>0.4</u>	lb/hr
	0.14 <u>2.27</u>	lb/day
	0.02 <u>0.32</u>	tpy
Oxides of Nitrogen (NO _x as NO ₂):	9	ppmv @ 3% O ₂
	0.39	lb/hr
	5.78 <u>2.24</u>	lb/day
	0.96 <u>0.32</u>	tpy
Volatile Organic Compounds (VOC): (as defined in Rule 210.1)	0.34 <u>0.18</u>	lb/hr
	4.59 <u>1.01</u>	lb/day
	0.77 <u>0.14</u>	tpy
Carbon Monoxide:	50	ppmv @ 3% O ₂
	1.3	lb/hr
	49.43 <u>7.56</u>	lb/day
	3.24 <u>1.07</u>	tpy

Application No. 0368002 for 35 MMBtu/hr Propane Fueled Heater

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Under the section titled "Compliance Testing Requirements", paragraphs two and three are both related to initial performance testing for NO_x, and the requirements are not consistent. As the underlying rule allows for an exemption from testing for units with heat input less than 90,000 therms, we believe that paragraph two should be deleted. We request that the section be modified as shown below:

Boiler stack shall be equipped with sampling ports (in accordance with California Air Resources Board Standards), sampling platform, access to sampling platforms, and utilities for sampling equipment to perform source-sampling operations. (Rule 108.1)

~~Initial compliance with NO_x emission limits shall be verified by compliance test utilizing test methods listed in Subsection VI.B of Rule 425.2 within 60 days of District initial start-up inspection. (Rule 210.1)~~

Initial testing for Rule 425.2 shall commence within 60-days after boiler's annual heat input attains or exceeds 90,000 therms (9,000-MMBtu). Boiler shall be tested in accordance with test methods listed in Subsection VI.B and in accordance to schedule in Subsection VI.C of Rule 425.2. (Rule 425.2)

Should inspection reveal conditions indicative of non-compliance, compliance with any emission limitations shall be verified, within 60 days of District request. Test results shall be submitted to KCAPCD within 30 days after test completion. (Rule 108.1 and 210.1)

The emission limits listed in the PDOC don't match the emissions presented in the AFC for the heater. We have verified the emission calculations and assumptions used to determine emissions and we are confident that the emissions presented in the AFC are correct. Also, as the ambient air quality modeling that was conducted for the AFC is based on the emissions from this permit unit, we would like to have the emissions consistent between the two documents. We request that the emission limits be modified as shown below:

Particulate Matter (PM ₁₀):	0.27 <u>0.35</u>	lb/hr
	2.68 <u>3.5</u>	lb/day
	0.07 <u>0.09</u>	tpy
Sulfur Oxides (SO _x as SO ₂):	0.04 <u>0.4</u>	lb/hr
	0.08 <u>3.96</u>	lb/day
	0.002 <u>0.1</u>	tpy
Oxides of Nitrogen (NO _x as NO ₂):	9	ppmv @ 3% O ₂
	0.39	lb/hr
	3.89	lb/day
	0.1	tpy
Volatile Organic Compounds (VOC): (as defined in Rule 210.1)	0.34 <u>0.18</u>	lb/hr
	3.06 <u>1.75</u>	lb/day
	0.08 <u>0.04</u>	tpy
Carbon Monoxide:	50	ppmv @ 3% O ₂
	1.31	lb/hr
	13.15	lb/day
	0.32	tpy

Application No. 0368003 for Two 18,000-Gallon Heat Transfer Fluid (HTF) Expansion Tanks Vented to Vapor Control System, Including Piping Network

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Solar Millennium requests that the District consider deleting Condition 2, the requirement for a Leak Detection and Repair (LDAR) program, from the PDOC. The District has cited Rule 210.1 BACT requirement as the basis for the condition. Although we have not yet obtained quotations for an LDAR program from qualified contractors, we expect that LDAR would be very expensive to implement at this facility due to the geographic size of the facility and the elevated piping, which would necessitate a manlift to perform the instrument monitoring. Due to the expense, we believe that LDAR would not be cost-

effective, and thus should not be required as BACT. In addition, the only operating solar thermal facility in California (the SEGS facility in Kramer Junction) does not conduct an LDAR program, and LDAR has not been required by the Antelope Valley Air Quality Management District for the Palmdale Hybrid Power Project, by the South Coast Air Quality Management District for the proposed Palen Solar Power Project or by the Mojave Desert Air Quality Management District for the proposed Victorville 2 Hybrid Power Project or the proposed Blythe Solar Power Project.

HTF is a stable liquid at ambient temperatures and has negligible vapor pressure. If a leak were to occur, HTF would condense to a liquid almost immediately. As a liquid with negligible vapor pressure, the leak would not result in VOC emissions. The operator plans to conduct a visual inspection of the piping network daily. The purpose of the inspection is to identify piping system leaks. This daily inspection is sufficient to ensure that the piping network remains in leak-free and in good operating condition.

Based on these factors, we request that the permit condition be deleted as shown below:

- ~~2. Permittee shall establish an inspection and maintenance program to determine, repair, and log leaks in HTF piping network and expansion tanks. Inspection and maintenance program and related logs shall be available to District staff upon request. (Rule 210.1 BACT Requirement)~~
 - ~~a. All pumps, compressors and pressure relief devices (pressure relief valves or rupture disks) shall be electronically, audio, or visually inspected once every operating day.~~
 - ~~b. All accessible valves, fittings, pressure relief devices (PRDs), hatches, pumps, compressors, etc. shall be inspected quarterly using a leak detection device such as a Foxboro OVA 108 calibrated for methane.~~
 - ~~c. VOC leaks greater than 100 ppmv shall be repaired within seven calendar days of detection.~~
 - ~~d. VOC leaks greater than 10,000 ppmv shall be repaired within 24 hours of detection.~~
 - ~~e. Permittee shall maintain a log of all VOC leaks exceeding 10,000 ppmv, including location, component type, and repair made.~~
 - ~~f. Permittee shall maintain record of the amount of HTF replaced on a monthly basis for a period of 5 years.~~
 - ~~g. Any leak detected by District inspection(s) exceeding 100 ppmv and not repaired in 7 days and 10,000 ppmv not repaired within 24 hours shall constitute a violation of this Authority to Construct (ATC)/Permit to Operate (PTO).~~
 - ~~h. Pressure sensing equipment shall be installed that will be capable of sensing a major rupture or spill within the HTF network.~~

If the District does not accept our recommendation to delete Condition 2, we request changes to Condition 2(f). Condition 2(f) specifies a retention period for HTF replacement records of five years. This is inconsistent with the retention period for the rest of the records required for this permit of three years. We would prefer a consistent period of three years for all permit records. We request that the condition be modified as shown below:

- ~~f. Permittee shall maintain record of the amount of HTF replaced on a monthly basis for a period of 5 three years.~~

The "Compliance Testing Requirements" section contains references to hourly and concentration emission limits that are not applicable to this source, as there are no hourly or concentration limits. In addition, the section references Rule 108.1 for test procedures; the procedures listed in that rule are not appropriate for fugitive sources and, therefore, we request that the Compliance Testing Requirements be deleted from the PDOC.

We recognize that the emission limits listed in the PDOC for this emissions unit are different than the emissions listed in the AFC. It appears that the District has used light liquid emission factors during operating periods and heavy liquid emission factors for non-operating periods, which is different than the method used for the AFC, in which heavy liquid emission factors were applied for both operating and non-operating periods. We agree that the District's method is more appropriate and accept the District's recommendation for emission limits.

Application No. 0368004 for Vapor Control System

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Condition 1 of the Operational Conditions requires that the vapor control system be operated when the HTF expansion system is in operation and when the Ullage System is in operation. We would suggest that the condition be re-worded to require that the vapor control system be operated whenever either of those systems is vented to atmosphere. The reason for this request is that the expansion tanks operate continuously during solar field operation – the expansion tank allows for routine expansion and contraction of the HTF; however, the expansion tanks are not routinely vented to atmosphere, and thus would not require operation of the vapor control system. The requirement to vent through the vapor control system cannot be applied to emergency releases. The expansion tanks are equipped with pressure relief devices (PRD) which vent directly to atmosphere during over-pressure conditions. The PRDs are not and cannot be vented through controls for safety reasons. We request that the condition be modified as shown below:

1. Carbon adsorption system shall be operated during whenever the heat transfer fluid (HTF) expansion system ~~operation is vented to atmosphere~~ and during operation of HTF Ullage system. Releases associated with emergency pressure relief are not subject to this requirement. (Rule 210.1)

The "Compliance Testing Requirements" section requires testing within 45 days of a District request. In our experience, 45 days is insufficient to identify a contractor, issue a purchase order, schedule and conduct the test. In addition, we believe that the deadline for submittal of the test results to the District should be clearly identified in the permit. Therefore, the following changes are recommended to the condition:

Should inspection reveal conditions indicative of non-compliance, compliance with hourly and concentration emission limits for VOC shall be verified pursuant to Rule 108.1 and KCAPCD Guidelines for Compliance Testing, within 45-60 days of District request. Test results shall be submitted to KCAPCD within 30 days after test completion.

We recognize that the emission limits listed in the PDOC for this permit unit are different than the emissions listed in the AFC. As the difference in emissions has no adverse regulatory consequences to the Project, we accept the District's recommendation for emission limits for this equipment.

Application No. 0368005 for Forced Draft Auxiliary Cooling Tower with 2 Cells and High Efficiency Drift Eliminator

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Item C of the Equipment Description is slightly misleading, as the cooling tower requires two pumps per cooling tower cell, for a total of four pumps. We request that the item be modified as shown below:

C. ~~Two~~ Four 30-hp (1765-gpm) Cooling Water Pumps

The section titled "Compliance Testing Requirements" references requirements for testing VOC and references Rule 108.1 for test requirements. The cooling tower is not expected to emit VOC. In addition, the test procedures listed in Rule 108.1 are not appropriate for a cooling tower that does not have a stack. Given that Operating Condition 9 requires continuous monitoring of conductivity (or weekly TDS monitoring) and Condition 5 requires daily emission calculations, we believe that additional compliance testing requirements are unnecessary and, therefore, we request that the Compliance Testing Requirements be deleted from the PDOC.

The annual emission limit listed in the PDOC is not consistent with the emissions presented in the AFC. As the ambient air quality modeling that was conducted for the AFC relies in part on the annual PM10 emissions from this permit unit, we would like to have the emissions consistent between the two documents. We request that the emission limits be modified as shown below:

Particulate Matter (PM ₁₀):	0.03	lb/hr
	0.49 <u>0.48</u>	lb/day
	0.09 <u>0.06</u>	tpy

Application No. 0368006 for ~~Bio-Remediation~~ Land Treatment of Hydrocarbon Contaminated Soil

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Solar Millennium also requests that this emission unit be renamed as a "Land Treatment Unit". The term bio-remediation implies an active process in which bacteria are added to enhance treatment. The planned process is passive – degradation of hydrocarbons will occur using naturally occurring microorganisms.

The dimensions of the land treatment unit have been refined during the development of the Project, and consequently, we are requesting a minor change to the Equipment Description. We do not expect that the change in dimensions would have an adverse impact on emissions. Please revise the equipment description as follows:

A. ~~800~~ 500-ft. by ~~200~~ 350-ft. ~~bio-remediation~~ land treatment unit/land-farm facility,

In addition, the lining planned for the land treatment unit has been more fully developed. The planned liner design consists of two feet of native clay with an R-value of at least 40 to 50, lime treated and

compacted to 95 percent. To ensure that the equipment design information in the PDOC matches the other permit documents for the Project, we request that the Design Conditions be modified as follows:

- a. ~~Bio-remediation~~ Land treatment unit area shall be lined with ~~minimum 60-mil high density polyethylene (HDPE)~~ 2 ft of native clay with R-value of 40 to 50, lime treated and compacted to 95 percent, or alternate lining approved by Lahontan Regional Water Quality Board (LRWQB). (Rule 210.1)

Operational Condition 1, as written, does not specify where the opacity measurement should be taken. Consistent with the requirements of Rule 403, we suggest that the opacity should be evaluated at the facility fenceline. Based on this recommendation, we request that Condition 1 be revised as follows:

1. Visible emissions from ~~bio-remediation~~ land treatment unit /land-farm facility emission unit shall not equal or exceed 0% opacity beyond the property line of the facility for more than 5 minutes in any two hour period. (Rule 210.1 BACT Requirement)

Operational Condition 5.d. requires record retention of 5 years; the recordkeeping requirement in the "Emission Limits" section specifies three years. In the interest of consistency, we request that the Condition 5.d., be revised as follows:

- [5.]d. Records of soil treatment and monitoring results shall be maintained at the site for a period of at least ~~5~~ three-years, and

The "Compliance Testing Requirements" section contains references to hourly and concentration emission limits that are not applicable to this source, as there are no hourly or concentration limits. In addition, the section references Rule 108.1 for test procedures; the procedures listed in that rule are not appropriate for an area source such as the land treatment unit, as it has no stack. Given that Conditions 3, 4, and 5 require the establishment of an inspection and maintenance program that includes weekly instrument monitoring of the land treatment unit, we believe that additional compliance testing requirements are unnecessary and, therefore, we request that the Compliance Testing Requirements be deleted from the PDOC.

We recognize that the emission limits listed in the PDOC for this emissions unit are different than the emissions listed in the AFC. As the difference in emissions has no adverse regulatory consequences to the Project, we accept the District's recommendation for emission limits for this equipment.

Application No. 0368007 for 2000-kW Emergency Generator Set Driven with 2922-Bhp Diesel Fueled Piston Engine

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Operational Condition 6 requires records retention for two years, while the retention period specified in the "Emissions Limits" section is three years. In the interest of consistency, we request that the Condition 6, be revised as follows:

6. Operating record of this equipment shall be maintained in format approved in writing by District, kept for minimum of ~~two~~ three years, and made available upon request of District personnel. Record shall include, at minimum, days and hours of operation, location of

operation, amount of fuel oil supplied to this engine, and date(s), check(s) and certification(s) of injection timing. (Rules 209 and 210.1)

The section titled "Compliance Testing Requirements" requires compliance with the VOC limits. This appears to be incomplete, as the engine would emit NOx, SOx, CO and PM10, in addition to VOC. In addition, in our experience, 45 days is insufficient to identify a contractor, issue a purchase order, schedule and conduct the test. We also believe that the deadline for submittal of the test results to the District should be clearly identified in the permit. Therefore, the following changes are recommended to the condition:

Should inspection reveal conditions indicative of non-compliance, compliance with hourly and concentration emission limits for NOx, SOx, CO, PM10 and VOC shall be verified pursuant to Rule 108.1 and KCAPCD Guidelines for Compliance Testing, within 45-60 days of District request. Test results shall be submitted to KCAPCD within 30 days after test completion.

The daily and annual emission limits listed in the PDOC do not match the information provided in the application for the engine submitted in February 2010. It appears that the District has assumed 24 hours per day for calculating the daily emissions and 200 hours per year for the annual emissions. The California ATCM for compression ignition engines limits routine maintenance operation of the engine to one hour per day and 50 hours per year. We don't want to have emission limits that imply non-compliance with an applicable requirement. Also, as the ambient air quality modeling that was conducted for the AFC relies on the emissions from this permit unit, we would like to have the emissions consistent between the two documents. We request that the emission limits be modified as shown below:

Particulate Matter (PM ₁₀):	0.15	gm/bhp-hr
	0.97	lb/hr
	23.19 <u>0.97</u>	lb/day
	0.1 <u>0.024</u>	tpy
Sulfur Oxides (SOx as SO ₂):	0.032	lb/hr
	0.75 <u>0.032</u>	lb/day
	0 <u>0.001</u>	tpy
Oxides of Nitrogen (NOx as NO ₂):	4.5 <u>4.56</u>	gm/bhp-hr
	28.99 <u>29.35</u>	lb/hr
	695.85 <u>29.35</u>	lb/day
	2.9 <u>0.73</u>	tpy
Volatile Organic Compounds (VOC): (as defined in Rule 210.1)	1.93 <u>1.54</u>	lb/hr
	46.39 <u>1.54</u>	lb/day
	0.19 <u>0.039</u>	tpy
Carbon Monoxide:	16.75 <u>16.73</u>	lb/hr
	402.04 <u>16.73</u>	lb/day
	1.68 <u>0.42</u>	tpy

Application No. 0368008 for Emergency Firewater Pump Driven with 300-Bhp Diesel Fueled Piston Engine

We request a name change for the applicant to Ridgecrest Solar I, LLC which is the Project subsidiary company wholly owned by Solar Millennium. The AFC application with the California Energy Commission has been amended to record the same name change.

Operational Condition 6 requires records retention for two years while the retention period specified in the Emissions Limits section is three years. In the interest of consistency, we request that the Condition 6, be revised as follows:

6. Operating record of this equipment shall be maintained in format approved in writing by District, kept for minimum of ~~two~~ three years, and made available upon request of District personnel. Record shall include, at minimum, days and hours of operation, location of operation, amount of fuel oil supplied to this engine, and date(s), check(s) and certification(s) of injection timing. (Rules 209 and 210.1)

The section titled "Compliance Testing Requirements" requires compliance with the VOC limits. This appears to be incomplete, as the engine would emit NOx, SOx, CO and PM10, in addition to VOC. In addition, in our experience, 45 days is insufficient to identify a contractor, issue a purchase order, schedule and conduct the test. We also believe that the deadline for submittal of the test results to the District should be clearly identified in the permit. Therefore, the following changes are recommended to the condition:

Should inspection reveal conditions indicative of non-compliance, compliance with hourly and concentration emission limits for NOx, SOx, CO, PM10 and VOC shall be verified pursuant to Rule 108.1 and KCAPCD Guidelines for Compliance Testing, within ~~45-60~~ days of District request. Test results shall be submitted to KCAPCD within 30 days after test completion.

The daily and annual emission limits listed in the PDOC do not match the information provided in the AFC for the engine. It appears that the District has assumed 24 hours per day for calculating the daily emissions and 200 hours per year for the annual emissions. The California ATCM for compression ignition engines limits routine maintenance operation of the engine to one hour per day and 50 hours per year. We don't want to have emission limits that imply non-compliance with an applicable requirement. Also, as the ambient air quality modeling that was conducted for the AFC relies on the emissions from this permit unit, we would like to have the emissions consistent between the two documents. We request that the emission limits be modified as shown below:

Particulate Matter (PM ₁₀):	0.15	gm/bhp-hr
	0.1	lb/hr
	2.38 <u>0.1</u>	lb/day
	0.04 <u>0.002</u>	tpy
Sulfur Oxides (SOx as SO ₂):	0.003	lb/hr
	0.08 <u>0.003</u>	lb/day
	0.0003 <u>0.001</u>	tpy
Oxides of Nitrogen (NOx as NO ₂):	2.8	gm/bhp-hr
	1.85 <u>1.88</u>	lb/hr
	44.45 <u>1.88</u>	lb/day
	0.19 <u>0.05</u>	tpy

