



August 29, 2011

Mike Monasmith  
Compliance Project Manager  
Systems Assessment & Facility Siting Division  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Subject: Air Quality Letters to Docket  
Hidden Hills SEGS Project (11-AFC-02)

Dear Mr. Monasmith:

Please find attached the following correspondence re Air Quality that needs to be submitted to Dockets:

- Transmittal Letter for Application for Determination of Compliance and Authority to Construct, submitted to Great Basin Unified APCD on August 3, 2011
- Email correspondence between Richard Beckstead, Permitting Manager, Department of Air Quality and Environmental Management, Clary County, Nevada and Nancy Matthews, Sierra Research regarding air quality cumulative impact analysis.

Thank you for adding these documents to the record.

Sincerely,  
CH2M HILL

A handwritten signature in blue ink, appearing to read "John L. Carrier".

John L. Carrier, J.D.  
Program Manager

Encl.



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August 3, 2011

Mr. Duane Ono  
Deputy Air Pollution Control Officer  
Great Basin Unified Air Pollution Control District  
157 Short Street  
Bishop, CA 93514-3537

Subject: BrightSource Energy Hidden Hills Solar Electric Generating Station  
Application for Determination of Compliance and Authority to Construct

Dear Mr. Ono:

On behalf of BrightSource Energy, we are pleased to provide this Application for Determination of Compliance and Authority to Construct for the proposed Hidden Hills Solar Electric Generating Station (HHSEGS) to be located in southern Inyo County. Please find attached a copy of the Air Quality section and Appendix 5.1 from the Application for Certification (AFC) to the California Energy Commission (CEC) for the HHSEGS project. These AFC sections, together with the enclosed Great Basin Unified APCD (District) permit application forms and air quality modeling data on compact disc, are provided for your review. The AFC will be filed with the CEC within the next few days. We are filing this permit application with the District in advance of the AFC filing to provide additional time for the District to make a data adequacy determination in accordance with the CEC AFC process. A copy of the complete AFC will be provided to the District as soon as it is available.

HHSEGS is a solar thermal project consisting of two solar plants. Each solar plant will use heliostats—elevated mirrors guided by a tracking system mounted on a pylon—to focus the sun's rays on a solar receiver steam generator (SRSG) atop a tower near the center of each solar field. In each plant, a steam turbine will receive steam from the SRSG (or solar boiler) to generate electricity. The solar field and power generation equipment will start each morning after sunrise and will shut down in the evening (unless augmented by the auxiliary boilers) when insolation drops below the level required to keep the turbine online. To save water in the site's desert environment, each plant will use dry cooling to cool and condense process water.

Each of the two solar plants includes three natural gas-fired auxiliary boilers that will be used for augmenting the solar operation when solar energy diminishes or during transient cloudy conditions. Each solar plant also includes a natural gas-fired start-up boiler that will be used during the morning start-up cycle to assist the plant in coming up to operating temperature more quickly, for a total of eight boilers subject to District permit requirements. Finally, one emergency diesel generator and one diesel fire pump engine

will be installed at each solar plant and in the project common area, for a total of three emergency generators and three fire pump engines. Daily and annual fuel use limitations are being proposed for the fuel-burning equipment to ensure that emissions remain below certain regulatory thresholds.

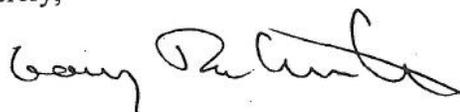
The following equipment will also be part of the project but is exempt from the requirement to obtain a permit:

Equipment Description	Exemption
two 12.2 MMBtu/hr natural gas-fired boilers	District Rule 201.F, exempting "Steam generators ... that have a maximum heat input rate of less than 15 million British Thermal Units (BTU) per hour (gross), and are fired exclusively with natural gas..."
two wet surface air coolers	District Rule 201.D.4, exempting "[w]ater cooling towers ... not used for evaporative cooling of process water..."
two oil-water separators	District Rule 201.H.4, exempting "containers, reservoirs or tanks used exclusively for: ... unheated storage of organic materials with an initial boiling point of 300 F or greater."
two 8,000-gallon diesel fuel storage tanks	District Rule 201.H.4, exempting "containers, reservoirs or tanks used exclusively for: ... unheated storage of organic materials with an initial boiling point of 300 F or greater."

We have included a check for \$100 to cover the filing fee for application. We understand that the District will be billing BSE for the Authority to Construct Initial Permit Fee around the time the Authority to Construct is issued.

Thank you for your time and consideration in this matter. If you have any questions regarding this application, please contact Nancy Matthews or me at (916) 444-6666.

Sincerely,

  
Gary Rubenstein

Enclosures

cc: John Carrier, CH2M Hill  
Clay Jensen, BSE  
Jeff Harris, Ellison Schneider & Harris  
Susan Strachan