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May 18, 2005

Dr. James Reede
Energy Facility Siting Project Manager
California Energy Commission
1516 - 9th Street
Sacramento, CA 95814

Re: Pastoria Energy Facility Expansion Project
Docket # 05-AFC-01

Dear Dr. Reede:

In response to recent, informal CEC Staff requests, we are providing the following additional information related to air quality impacts of the Pastoria Energy Facility Expansion Project.

1. Copies of District and EPA PSD Permit Applications

Copies of these application materials were sent to the Dockets Office in early May. Additional copies of these application materials were emailed to the CEC Staff's air quality consultant on May 17.

2. Additional Information Regarding Potential for Cumulative Impacts

Cumulative air quality impacts from the proposed project are discussed briefly in Section 5.2.7 of the AFC. More specific information regarding potential cumulative impact sources has been requested.

The basis for the applicant's conclusion that no additional emission sources need to be considered for cumulative air quality impacts is the information provided by the Kern County Planning Department, referenced in Section 5.9.1 of the AFC.

> The existing conditions status was verified in a letter dated March 23, 2005, from Lorelei H. Oviatt, AICP, Supervising Planner, Kern County Planning Department. Specifically, this letter stated that...[t]here is no new development approved or proposed since 1999 that occurs within a 5- or 6-mile radius of the existing plant site.

Since no new development has been approved or proposed since 1999 within 5 to 6 miles of the project boundary, there are no potential new sources of emissions that would need to be included in a cumulative air quality impact analysis.

3. Schedule for Obtaining Other Required Air Quality Permits

The SJVAPCD schedule for issuing preliminary and final Determinations of Compliance for the proposed project will directly impact the CEC's AFC review schedule. The applicant has discussed project review with the SJVAPCD staff (telephone conversation with Richard Karrs, March 15, 2005) and at that time it was the opinion of the District staff that it would not be necessary to request expedited review of the application. However, we intend to continue monitoring the District's permit review process to ensure that any additional information needed to complete their review is provided in a timely manner. Once the CEC staff issues a proposed schedule for the licensing proceeding, we will again consult with the District staff regarding their review schedule and if it becomes necessary to request and pay for expedited review to meet the schedule, the applicant will do so.

Following is the applicant's proposed schedule for obtaining the preliminary and final DOCs:

Milestone	Date
Air permit application deemed complete	May 20, 2005
PDOC issued	August 19, 2005
FDOC issued	September 30, 2005

A PSD permit must be obtained from EPA Region 9 before construction of the proposed modification can commence. The applicant will be similarly diligent about monitoring EPA's permit review and providing additional information as required. As the PSD permit is not required as part of the AFC process, the issuance of the PSD permit does not affect the AFC review schedule.

4. Emissions Monitoring During CTG Commissioning Activities

Following completion of construction but before the CTG is available for commercial operation, the CTG must be tested, adjusted, tuned, and calibrated. Some of the operational and testing activities must take place before the dry low-NOx combustion system is tuned and before the SCR system is installed. The CTG experiences many startups and shutdowns and extensive low-load operation during this tuning and testing period. Emissions of NOx, CO, and VOC during the commissioning period are expected to be higher than during normal turbine operation; these higher emissions and air quality impacts are evaluated in Section 5.2.5.3.3 of the AFC.

During the commissioning period, a continuous emissions monitoring system will be installed and operated to ensure compliance with commissioning emission limits. While the monitors will not be certified during the commissioning period, they will be calibrated daily to ensure that the collected data are accurate. The monitors in use during the commissioning period are those that will be used to demonstrate compliance with permit conditions and acid rain requirements throughout the life of the project. The applicant expects that the District will require monitoring of the following parameters during the commissioning period:

- firing hours
- fuel flow rates
- stack gas NOx, CO, and O_2 or CO_2 concentrations

The applicant expects that monitored parameters will be recorded every 15 minutes. After first firing of the CTG, the detection range of the CEMs will be adjusted as necessary to accurately measure the CO and NOx emissions concentrations throughout their ranges.

We appreciate the opportunity to provide this additional information. If you or your staff have any additional questions regarding the potential air quality impacts of the proposed project, please do not hesitate to contact us.

Sincerely,

Nancy Matthews

Nancy Matthews

cc: Will Walters, Aspen Environmental
Mike Ringer, CEC
Jennifer Scholl, URS