AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

Air Pollution Control Board

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August 9, 2006

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KEVIN JOHNSON
LSP SOUTH BAY LLC
1735 TECHNOLOGY DRIVE STE 820
SAN JOSE CA 95050

APPLICATION STATUS

The San Diego Air Pollution Control District (District) has reviewed the South Bay Replacement Project (SBRP) Application No. 984569 for a Determination of Compliance /Authority to Construct /Permit to Operate a power generating plant consisting of two (2) natural gas fired combustion turbines and one steam turbine, to be located immediately adjacent to and south of the existing South Bay Power Plant (SBPP) in the City of Chula Vista adjacent to the San Diego Bay. The application has been determined incomplete at this time due to insufficient information. The following additional information must be submitted to the District for the application to be determined complete:

1. Analyses on how the SBRP will comply with the requirements of District New Source Review Rule 20.3, including Air Quality Impact Analysis, Prevention of Significant Deterioration, and Emission Offsets, during the SBRP commissioning period. The SBRP commissioning period commences in the second quarter of 2009 and ends in the second quarter of 2010, during which time the existing South Bay Power Plant (SBPP) is also in operation. This may result in emission increases which subject the SBRP from the above District New Source Review requirements.

2. Calculation of criteria pollutant emissions from the SBRP during the commissioning period.

3. Manufacturer documents on specifications and emission data for the combustion gas turbines, the steam turbine, the duct burner, the boiler, and the fire pump engine.

4. Design parameters and details for the dry low-NOx combustor, the selective catalytic reduction (SCR) and oxidation catalytic control systems to demonstrate that the proposed systems are adequate to achieve required controlled emission rates.

5. Specifications and operational procedures for the Continuous Emission Monitoring Systems (CEMS), to be used during initial start-up and commissioning prior to the permanent CEM's being certified.

6. CEMS data on Nitrogen Oxides (NOx) emissions from the SBPP for the years 2004 and 2005.

7. Fuel consumption records from the SBPP for the years 2004 and 2005.

8. For the health risk assessment on emissions of non-criteria pollutants:

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a. Calculation for toxic cancer risk of naphthalene;
b. Clarification on the use of the AERMOD modeling: whether the source strength calculated from HARP was used as emission rates for each source, or if the AERMOD calculations that used unit emission rates were post processed with the source strength data to produce tables of risks for all receptors;
c. Clarification on which AERMOD output files or post-processed risk files were used to reach the conclusions of the risks assessment, and copy of these files for review. The Readme.txt file provided with the modeling CDs is not sufficient.
d. Verification that the UTMs for the emission sources, buildings, property boundary and receptors use the correct datum for acceptance of calculation for review. The UTM Zone 11 NAD27 datum is preferred by the District to ensure accuracy and consistency with digital elevation data. Since San Diego county geographic data is provided for analysis and display in NAD 1983 California VI FIPS feet, location coordinates used for modeling should be transformed to the proper UTM datum before proceeding with the modeling.

The District will supply the applicant with the Chula Vista AERMOD-compatible meteorological data for the years 2000, 2001 and 2002 for the purposes of Air quality Impact Analysis and Toxic Health Risk Assessment. Following the release of these data, revised air quality modeling and health risks assessment results for normal operations, startups and commissioning should be provided to the District, along with maps that included concentration isopleths and maximum impact locations for all criteria pollutants.

Please submit this information as soon as possible so as to take action on your application. In addition, the applicant will be required to file an application for Title IV permit two (2) years before startup of the equipment. This issue is not a requirement for this application to be deemed complete.

If you have any questions regarding these comments, please contact the undersigned at (858) 586-2747.

Sincerely,

Camqui Nguyen

CAMQUI NGUYEN
Associate Air Pollution Control Engineer

I.D.#: 17 334A

Cc: Bill Pfanner, California Energy Commission
Tom Andrews, Sierra Research
San Diego APCD Compliance Division