



**AIR POLLUTION  
CONTROL DISTRICT**  
COUNTY OF SAN LUIS OBISPO

September 4, 2008

Perry Fontana  
Ausra CA II, LLC, dba Carrizo Energy LLC  
2585 East Bayshore Road  
Palo Alto CA 94303

<b>DOCKET</b> 07-AFC-8
DATE <u>SEP 04 2008</u>
RECD. <u>SEP 08 2008</u>

**SUBJECT:** Notice of an Incomplete Application for the Standby Diesel Powered Generator Proposed for the Carrizo Energy Solar Farm

Dear Mr. Fontana:

Your application, received on August 8, 2008, to modify San Luis Obispo Air Pollution Control District (District) Authority to Construct number 4510 issued January 9, 2008 to include an additional 1341 horsepower diesel powered generator has been reviewed and determined to be incomplete. Evaluation of your application can continue upon receipt of a revised facility-wide Screening Health Risk Assessment (SHRA) which determines the point of maximum impact (PMI) and quantifies and assesses the potential for adverse health effects to the maximum exposed individual at a residence (MEI<sub>R</sub>) and offsite workplace (MEI<sub>W</sub>). This should include both the firewater pump and the emergency generator engines and any other source of toxic emissions proposed at this facility.

Note that there were several errors identified in the screening risk assessment discussion submitted with the Supplement to the Carrizo Energy Solar Farm Application for Certification:

- Calculations included in Appendix H for Emission Rate per Testing [event] were listed as lb/hr, but the testing duration was only half an hour resulting in the yearly, hourly and annual emission rates being only half of the actual emission rates.
- The exposure frequency (EF) was listed at 52 days/year, but the annual emission rate and EPA annual adjustment factor (0.08) had already annualized the emissions so the exposure frequency should be 365 days/year.
- The PM emission rate for the emergency diesel generator was listed as 0.02 g/bhp-hr, the nominal emissions listed on the Caterpillar technical data sheet for the C32 engine. Footnote 3 of the technical data sheet clearly states that this is the "nominal" emissions data based on steady state operating conditions at "100% load and thus cannot be used to compare to EPA regulations which use values based on a weighted cycle." The PM emission rate to be used for this analysis is 0.15 g/bhp-hr, the family emission limit (FEL) as listed in CARB Executive Order U-R-001-0331-1 for the 2008 Caterpillar Model C32 generator engine.

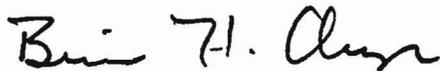
*Ausra – Incomplete Appl. No. 4924*

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Processing the application cannot proceed without receipt of the above information. The District will allow the incomplete status of the application for 90 days to enable you to provide the required material. For your reference the application for this modification has been assigned the number 4924. Please refer to this number in future correspondence with the District concerning this application. Every effort will be made to evaluate your application upon receipt of the requested information and to notify you of a decision as quickly as possible. If you have specific questions regarding the required screening risk assessment, contact Paul Reitz at (805) 781-5767, or you may contact me at (805) 781-4666.

Sincerely,



BRIAN H. AUNGER  
Air Pollution Control Engineer

cc John Ligue, URS  
Tuan Ego. California Energy Commission