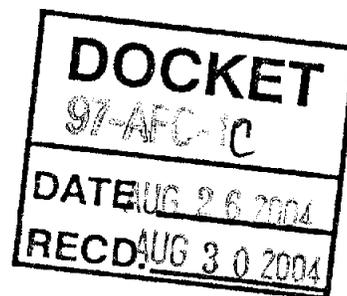




AUG 30 2004



August 26, 2004

Mr. Steve Munro  
Compliance Project Manager  
California Energy Commission  
1516 9th Street, MS 2000  
Sacramento, CA 95814-5512

**Subject: Petition for Revisions/Administrative Changes to Air Quality Conditions  
Commission Decision (97-AFC-1C)  
High Desert Power Project, LLC**

Dear Mr. Munro:

High Desert Power Project, LLC ("HDPP") is submitting this petition for revisions to the Commission Decision (97-AFC-1C) for the High Desert Project located in Victorville, California. As detailed in the attached pages, this petition consists of the following revisions:

- eliminating the duration of startup events and replacing the per combustion turbine startup and shutdown emission limits with emission limits for the total power block (three combustion turbines and one steam turbine) in Condition of Certification AQ-29;
- including SO<sub>2</sub> emission rates based on a higher heating value as well as a lower heating value in Conditions of Certification AQ-28, AQ-30, and AQ-31;
- minor administrative changes to Conditions of Certification AQ-14, AQ-16, AQ-19, AQ-25, AQ-26, and AQ-33 as detailed in the attached pages; and

This petition to amend the Commission Decision approving the project contains the information that is required pursuant to 20 CCR Section 1769, Post Certification Amendments and Changes, of the California Energy Commission's Siting Regulations.

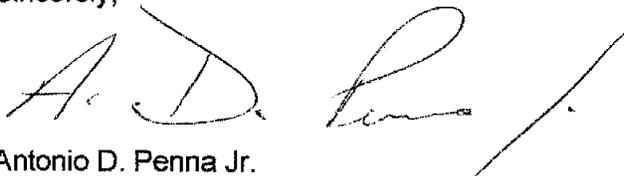
As demonstrated in this petition, the proposed revisions will not result in an increase to the current startup emission limits or have an adverse impact on ambient air quality. The proposed administrative changes do not affect compliance with applicable laws, ordinances, regulations, or standards (LORS). Accordingly, HDPP requests that the Energy Commission Staff expedite review of this petition, and request Commission approval of the proposed revisions in accordance with Title 20 CCR Section 1769 (a)(3).

Similar requests to implement the proposed changes to these conditions in the MDAQMD Authority to Construct permit and the EPA PSD permit will be submitted under separate cover to the MDAQMD and EPA, respectively.

In an effort to expedite the revisions, we will contact you next week to make arrangements for a phone conference to review and answer any questions you may have on our proposed revisions.

In the meantime, should you have any questions or need additional information regarding this submittal, please contact me at (760) 530-2312, Sara Head of ENSR at (805) 388-3775 or Ramiro Garcia at (949) 425-4755.

Sincerely,

A handwritten signature in black ink, appearing to read "Antonio D. Penna Jr.", with a long horizontal stroke extending to the right.

Antonio D. Penna Jr.  
Plant Engineer / Environmental Manager  
High Desert Power Project, LLC

cc: Mr. Gerardo Rios  
US EPA, Region IX  
75 Hawthorne Street (Air 5)  
San Francisco, CA 94105

Mr. Alan DeSalvio  
Mojave Desert AQMD  
14306 Park Avenue  
Victorville, CA 92392-2310

Ramiro Garcia, Constellation Energy

Sara Head, ENSR

Facility File: 13.1 (CEC Application)

## DESCRIPTION OF PROPOSED AIR QUALITY CONDITION REVISIONS

### 1. Change of Condition of Certification (AQ-29) Related to Startup

The main power production equipment at HDPP consists of three Siemens/Westinghouse combustion turbine generators (CTGs) and one Toshiba steam turbine generator (STG). HDPP has determined that additional time over what was assumed in the original Application for Certification (AFC) is needed to startup the CTGs. In a combined-cycle system, bringing a power block online is a complicated process. The startup sequence consists of multiple steps in which the equipment is "ramped up" to normal operating conditions. This ramp-up period consists of various gas turbine load conditions. During the ramp-up period, the heat recovery steam generators (HRSGs), steam drums, steam turbine, steam piping and emissions control equipment are heated and brought to stable operating conditions. During a typical startup, one CTG is started and ramped up to low load where it is held until the HRSG and steam system reach a manufacturer-specified temperature to prevent equipment damage and ensure safe operation according to manufacturer's procedures. Then, the second and third CTGs are started and go through a similar process. Additionally, the time needed to bring the units on-line can vary based on site conditions, time elapsed since last operated, and external factors such as Cal-ISO or DWR restrictions for putting power into the grid.

The AFC material submitted for the project addressed startup and shutdown emissions and durations. These parameters were best engineering estimates at that time and were derived from a 2 x 1 configuration assuming Westinghouse CTGs and STG. HDPP was actually built to include three Westinghouse CTGs combined with a Toshiba STG. Limited actual operations to date have shown that the as-built configuration results in significantly longer duration startup sequences from those estimated in the AFC.

The proposed condition changes should be processed as administrative certification revisions. The changes will not result in any increase in air emissions (or the emission of additional pollutants) from what was presented in HDPP's AFC or what is allowed in the existing certification. In addition, the changes will not affect the facility's ability to comply with ambient air quality standards, as discussed in later in this letter.

#### Current Emission and Duration Limits

Table 1 summarizes the startup and shutdown emission limits and durations from HDPP's existing Conditions of Certification. Table 2 contains the allowable daily and annual potential to emit (PTE) for the three CTGs. Note that the current certification provides the daily emission limits on a per turbine basis and the annual emission limits on a power block (combined for all three turbines) basis.

**Table 1**  
**HDPP Startup and Shutdown Limits Per CTG**

<b>Event</b>	<b>NO<sub>x</sub> Emissions (lb/event)</b>	<b>CO Emissions (lb/event)</b>	<b>Duration (hours)</b>
Cold Start	183	3,541	4.5
Warm Start	168	3,596	2.6
Hot Start	138	3,729	1.9
Shutdown	97	239	1.0

**Table 2**  
**Existing Emission Limits of Three CTGs**

<b>Period</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>
Daily (lb/day) <sup>1</sup>	848	8,072	1,448	27	435
Annual (tpy) <sup>2</sup>	205	750	129	14	233
1) Daily limits per CTG.					
2) Annual limits for total from three CTGs and cooling tower.					

Change from Per CTG Emission Limits to Power Block Emission Limits

Since the current certification does not limit the number of CTGs that could be started simultaneously, and the modeling analysis was performed based on all three CTGs with maximum hourly emission rates, a combined power block emission rate would not change the ambient air quality impact analysis performed as part of the AFC. Combining the per CTG limits into power block limits would provide HDPP with needed flexibility during the actual startup sequence. In that manner, the first CTG, which is ramped up the most slowly, might emit slightly more than its current lb/event limit, but then the other two CTGs would emit less as they could be started up and brought into compliance much quicker. The combined total would never be more than was assumed for the air quality modeling analyses (see impact analysis below). Furthermore, no changes are proposed to the current daily limits. The daily limits provide additional assurance that HDPP would not adversely impact air quality, as discussed in the air quality impact analysis later in this letter.

The proposed revised startup and shutdown event emission limits for the combined power block are shown in Table 3 (we have simply multiplied the per turbine emission limits by three). As indicated in the air quality impact analysis, no durations for these events are considered necessary.

**Table 3**  
**Proposed Modified HDPP Startup and Shutdown Limit per Power Block<sup>1</sup>**

Event	NO <sub>x</sub> Emissions (lb/event)	CO Emissions (lb/event)
Cold Start	549	10,623
Warm Start	504	10,788
Hot Start	414	11,187
Shutdown	291	717
1) Power block consists of three combustion turbines and one steam turbine		

Note that other combined-cycle power plant permits have been issued within EPA Region IX, which have combined startup emission limits for the power block. Examples include the Sunrise and Elk Hills Power Projects in the San Joaquin Valley Air Pollution Control District. Also, permits for Arlington Valley Energy and the Mesquite Generating Station in Arizona have recently been issued which includes a revision from startup emission limits per combustion turbine to limits per power block. These permits included review and comment by EPA Region IX staff prior to issuance.

**2. Proposed Administrative Changes to Conditions of Certification AQ-1, AQ-14, AQ-16, AQ-19, AQ-21, AQ-23, AQ-24, AQ-25, AQ-26, AQ-28, AQ-30, AQ-31, and AQ-33**

The proposed administrative changes to these conditions are described in detail in the next section. These changes are requested to maintain consistency with other requirements such as approved plans and protocols and preferred test methods. The proposed changes in AQ-28, AQ-30, and AQ-31 are requested to incorporate the addition of emission calculation methodology assuming the higher heating value of natural gas as required by the Acid Rain program. Deletion of Conditions that are no longer relevant is also requested to streamline the permit requirements.

The impact of the proposed changes is discussed in the air quality impact assessment, and compliance with the laws, ordinances, regulations, and standards (LORS) discussed later in this petition.

## CHANGES TO CONDITIONS

Proposed changes to the following Conditions of Certification are provided with new text shown underlined and deleted text is shown as ~~strikethrough~~. A discussion of the reason for the requested changes is provided following the proposed condition language, except the proposed change to startup conditions, which was discussed in the previous section.

### 1. Condition of Certification (AQ-29) Related to Startup

Condition of Certification AQ-29 is proposed for revision. We understand the term “base load” to mean any normal operating load, which will typically be between 70% and 100%. If there is room to interpret “base load” as meaning only 100% load, we suggest replacing the words “base load” with “normal operating load.”

AQ-29. Emissions of CO and NO<sub>x</sub> from this ~~equipment~~power block may exceed the limits contained in Condition AQ-28 during startup and shutdown periods as follows:

a. Startup is defined as the period beginning with ignition and lasting until the ~~equipment~~power block has reached operating permit limits. Cold startup is defined as a startup when the ~~CTG~~power block has not been in operation during the preceding seventy-two (72) hours. Hot startup means a startup when the ~~CTG~~ power block has been in operation during the preceding eight (8) hours. Warm startup means a startup that is not a hot or cold startup. Shutdown shall be defined as the period beginning with the lowering of ~~equipment~~the power block from ~~base load~~ normal operating load and lasting until fuel flow is completely off and combustion has ceased.

~~b. Transient conditions shall not exceed the following durations:~~

- ~~i. Cold startup – 4.5 hours~~
- ~~ii. Warm startup – 2.6 hours~~
- ~~iii. Hot startup – 1.9 hours~~
- ~~iv. Shutdown – 1.0 hour~~

~~be.~~ During a cold startup emissions shall not exceed the following, verified by CEMS:

- i. NO<sub>x</sub> – ~~483~~ 549 lb
- ii. CO – ~~3,541~~ 10,623 lb

~~cd.~~ During a warm startup emissions shall not exceed the following, verified by CEMS:

- i. NO<sub>x</sub> – ~~468~~ 504 lb
- ii. CO – ~~3,596~~ 10,788 lb

~~de.~~ During a hot startup emissions shall not exceed the following, verified by CEMS:

- i. NO<sub>x</sub> – ~~438~~ 414 lb
- ii. CO – ~~3,729~~ 11,187 lb

~~ef.~~ During a shutdown emissions shall not exceed the following, verified by CEMS:

- i. NO<sub>x</sub> – ~~97~~ 291 lb
- ii. CO – ~~239~~ 717 lb

2. *Administrative Change to Condition of Certification AQ-14*

AQ-14. Emissions of NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia slip shall be monitored using a Continuous Emissions Monitoring System (CEMS). Turbine fuel consumption shall be monitored using a continuous monitoring system. ~~Stack gas flow rate shall be monitored using a Continuous Emission Rate Monitoring System (CERMS).~~ The project owner shall install, calibrate, maintain, and operate these monitoring systems according to an MDAQMD-approved monitoring plan and MDAQMD Rule 218, and shall be installed prior to initial equipment startup. Six (6) months prior to installation the operator shall submit a monitoring plan for MDAQMD review and approval.

As per previous discussions with MDAQMD, and as approved by MDAQMD and EPA in HDPP's CEMS Monitoring Plan, stack gas flow rate will be calculated using the method specified in the CEMS Monitoring Plan rather than via a flow monitor.

3. *Administrative Change to Condition of Certification AQ-16(a)*

AQ-16(a) NO<sub>x</sub> as NO<sub>2</sub> in ppmvd at 15% O<sub>2</sub> and lb/hr (measured per USEPA Reference Methods 7E, 19, and 20).

EPA allows the use of any one of these three reference methods. Note that reference method 7E was specified as an allowable method in the initial Compliance Test Protocol approved by MDAQMD and EPA.

4. *Administrative Change to Condition of Certification AQ-19(a), (b), (c), and (d)*

AQ-19(a) For NO<sub>x</sub>, Performance Specification 2 or 40 CFR 75 requirements and procedures.

AQ-19(b) For O<sub>2</sub>, Performance Specification 3 or 40 CFR 75 requirements and procedures.

AQ-19(c) For CO, Performance Specification 4 or 4a.

~~AQ-19(d) For stack gas flow rate, Performance Specification 6.~~

As per previous discussions with MDAQMD, and as approved by MDAQMD and EPA in HDPP's CEMS Monitoring Plan, stack gas flow rate will be calculated using the method specified in the CEMS Monitoring Plan rather than via a flow monitor.

5. *Administrative Change to Condition of Certification AQ-25*

AQ-25. The project owner shall ~~conduct all required cooling tower water quality tests~~ calculate PM<sub>10</sub> emissions in accordance with an MDAQMD-approved test and emissions calculation protocol. Thirty (30) days prior to the first such test the operator shall provide a written test and emissions calculation protocol for MDAQMD review and approval.

Per the MDAQMD-approved protocol, PM<sub>10</sub> emissions will be calculated based on circulation flow rate and data from an online conductivity meter rather than from cooling tower water quality tests.

6. *Delete Condition of Certification AQ-26*

Delete this condition since the MDAQMD-approved protocol does not involve weekly testing of blow-down water quality in the cooling tower.

7. *Administrative Change to Condition of Certification AQ-28*

AQ-28. Emissions from this equipment (including its associated duct burner) shall not exceed the following emission limits at any firing rate, except for CO, NO<sub>x</sub>, ~~and VOC~~, and ammonia slip during periods of startup, shutdown, and malfunction:....

This request will maintain consistency with MDAQMD ATC C005274, Condition 4 which states that the 10 ppm ammonia slip limit does not apply during startups, shutdowns, and malfunctions.

8. *Administrative Change to Condition of Certification AQ-28(b)(ii) - Add lb/hr of SO<sub>2</sub> based on high heating value (HHV) as follows:*

AQ-28(b)(ii) SO<sub>x</sub> as SO<sub>2</sub> – 1.11 lb/hr (based on LHV), 1.2 lb/hr (based on HHV), ~~(based on 0.00064 lb/MMBtu (lower heating value))~~.

The Acid Rain Program requires that SO<sub>2</sub> be reported based on the higher heating value as opposed to the lower heating value. Adding lb/hr based on HHV would avoid HDPP having to

report two different SO<sub>2</sub> values. Note that this does not represent any increase in emissions, but rather a different way of calculating the same emissions.

9. *Administrative Change to Condition of Certification AQ-30(d) - Add lb/day of SO<sub>2</sub> based on high Heating Value (HHV)*

AQ-30(d) SO<sub>x</sub> as SO<sub>2</sub> – 26.7 lb/day (LHV), 28.8 lb/day (HHV), verified by fuel sulfur content and fuel use data.

See change to AQ-28(b)(ii) above – 1.2 lb/hr X 24 hr/day = 28.8 lb/day. As note above, this does not represent an increase in emissions but rather a different way of calculating the same emissions.

10. *Administrative Change to Condition of Certification AQ-31(d) – Add tons/year of SO<sub>2</sub> based on high heating value (HHV)*

AQ-31(d) SO<sub>x</sub> as SO<sub>2</sub> – 14 tons/year (LHV), 15.8 tons/year (HHV), verified by fuel sulfur content and fuel use data.

See change to AQ-28(b)(ii) above – 1.2 lb/hr X 8,760 hr/yr ÷ 1 ton/2000 lb X 3 CTGs = 15.8 ton/year. As noted above, this does not represent an increase in emissions but rather a different way of calculating the same emissions.

## **NECESSITY FOR AIR QUALITY CONDITION REVISIONS**

Revisions of the Commission Decision related to startup limits in Condition of Certification AQ-29 are requested in this petition. The proposed revisions to this condition will address the technical issues described in this petition, provide added flexibility during startup/shutdown events, and will allow the plant to remain in compliance with the startup duration limits. Previous exceedances of the duration limits have been due to equipment failures and were reported to the MDAQMD pursuant to MDAQMD Rule 430 (Breakdown Provisions). The equipment malfunctions have since been resolved and the requested elimination of duration limits is necessary to maintain operation in compliance with the Conditions of Certification. Revisions to the form of the emission limits from a per CTG to a per power block basis does not affect compliance with the current emission limits during startup and shutdown events.

The proposed administrative changes to the other Conditions of Certification in this petition are requested to maintain consistency with other requirements such as approved plans and protocols, preferred test methods, and the Acid Rain program.

## **TIMING OF REQUEST FOR AIR QUALITY CONDITION REVISIONS**

As discussed previously, only limited information regarding emissions during startup and shutdown of the CTGs was available during the HDPP certification proceeding. Although some additional information has subsequently become available, characterization of the durations of startup and shutdown is still somewhat uncertain since the facility has only been in operation for less than one year. This lack of data is especially true given the uncertainty of potential external factors such as Cal-ISO or DWR restrictions for putting power into the grid.

The proposed administrative changes to the remaining conditions discussed in this petition are requested to coincide with identical proposed changes to the MDAQMD ATC permits for this facility.

## **IMPACT ANALYSIS OF AIR QUALITY CONDITION REVISIONS**

The proposed revisions could potentially change some of the assumptions upon which the Commission Decision was based. Therefore, an assessment of air quality impacts is provided with this petition. These analyses include an air quality impact analysis and a brief discussion of the LORS that could be affected by these changes. These analyses demonstrate that none of the findings of the Commission Decision are adversely affected by the proposed changes. Since the environmental impacts of the project remain insignificant, the proposed revisions should be permitted.

### *1. Effect of Requested Change to Condition of Certification AQ-29*

The potential air quality impact implications of eliminating the duration of a startup and revising the emission limits to a power block basis was evaluated. The peak emission rates for NO<sub>x</sub> and CO identified in HDPP's supplemental submission titled "Revised Short Term Air Quality Impact Assessment" dated November 1998 were reviewed. Table 4 summarizes the emission rates that were modeled in that document to demonstrate compliance with the NO<sub>x</sub> 1-hour California Ambient Air Quality Standard (CAAQS), and the CO 1-hour and 8-hour CAAQS.

The 1-hour emission rates in Table 4 are more than the permitted lb/event emission limits in Table 1. Since the maximum event emission rates will not change, only the duration of the event, compliance with the 1-hour NO<sub>x</sub> and 1-hour CO standards will not be affected. With respect to the 8-hour CO standard, previous modeling assumed an 8-hour average emission rate of 979 lb/hr, or a total of 7,832 lb per 8-hour period, for each CTG. This emission rate is also much more than any worst-case 8-hour emission rate calculated using the current lb/event and duration limits in Table 1, and permitted "normal operations" emission rates of 17.53 lb/hr/CTG.

Table 5 summarizes the demonstration of compliance with the applicable air quality standards.

**Table 4**  
**Startup Emission Rates Modeled for HDPP Permitting**

<b>Pollutant (Averaging Time)</b>	<b>Emission Rate (lb/hr/CTG)</b>	<b>Modeled Rate for 3 CTGs (lb/hr)</b>	<b>Modeled Peak Impact of 3 CTGs (<math>\mu\text{g}/\text{m}^3</math>)</b>
NO <sub>x</sub> (1-hour)	205.8	617.4	235
CO (1-hour)	4,409	13,227	7,500
CO (8-hour)	979	2,937	900

**Table 5**  
**Predicted Impacts of Startup Emission Rates Modeled for HDPP Permitting**

<b>Pollutant (Averaging Time)</b>	<b>Modeled Peak Impact of 3 CTGs (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>Background (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>Total (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>CAAQS (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>NAAQS (<math>\mu\text{g}/\text{m}^3</math>)</b>
NO <sub>x</sub> (1-hour) <sup>1</sup>	235	24	259	470	NA
CO (1-hour) <sup>2</sup>	7,500	9,200	16,700	23,000	40,000
CO (8-hour) <sup>2</sup>	900	8,500	9,400	10,000	10,000

1) Background 1-hour NO<sub>2</sub> is the concentration from the ozone limiting analysis that corresponds with the overall maximum NO<sub>2</sub> impact.  
2) Background CO data based on 1994-1997 ambient data from Victorville-Amargosa Street monitor.

As shown in Table 5, as long as each CTG is in compliance with the existing lb/event and daily limits, plant emissions will remain lower than what was modeled for purposes of determining compliance with ambient air quality standards. The limits on startup *duration* do not add any level protectiveness and are not a factor in the ambient air quality impact analyses results modeled for HDPP.

**2. Effect of Requested Administrative Change to Conditions of Certification AQ-28, AQ-30, and AQ-31**

An air quality impact assessment due to SO<sub>2</sub> emissions from the facility was performed for the HDPP and approved in the MDAQMD Final Determination of Compliance (FDOC) dated June 29,

1999. The results of the SO<sub>2</sub> impact analysis approved in the FDOC, along with the National Ambient Air Quality Standards (NAAQS) and CAAQS, are provided in Table 6.

**Table 6  
Predicted Impacts Due to HDPP SO<sub>2</sub> Emissions <sup>1</sup>**

<b>Averaging Period</b>	<b>Project Impact (µg/m<sup>3</sup>)</b>	<b>Background Concentration (µg/m<sup>3</sup>)</b>	<b>Total Impact (µg/m<sup>3</sup>)</b>	<b>NAAQS (µg/m<sup>3</sup>)</b>	<b>CAAQS (µg/m<sup>3</sup>)</b>
3-hour	2	35	37	1,300	n/a
24-hour	1	26	27	365	n/a
Annual	<1	5	5	80	30

1) Table 4 of the FDOC dated June 29, 1999.

The total predicted impacts of SO<sub>2</sub> approved in the FDOC were well below the NAAQS and CAAQS. The emission rates used in the original impact analysis were calculated using the lower heating value of natural gas. The proposed administrative change to Conditions of Certification AQ-28 and AQ-30 will include the higher heating value emission rates, which reflect an increase in hourly emissions of 0.09 lb/hr and an increase in daily emissions of 2.1 lb/day compared to the emissions modeled in the original impact analysis. Scaling the original HDPP 3-hour and 24-hour modeled impacts by these higher heating value emission increases gives a total 3-hour impact of 37.7 µg/m<sup>3</sup> (vs. 37 µg/m<sup>3</sup>) and a total 24-hour impact of 27.1 µg/m<sup>3</sup> (vs. 27 µg/m<sup>3</sup>) which are both well below the short-term SO<sub>2</sub> NAAQS.

The proposed administrative change to Condition of Certification AQ-31 for the annual SO<sub>2</sub> emission limits also include the higher heating value emission calculation. Condition of Certification AQ-5 requires that the sulfur content of natural gas not exceed 0.2 grains per 100 dry standard cubic feet (dscf). Monthly fuel analyses have continuously shown the sulfur content of the natural gas to be well below 0.2 grains per dscf, therefore the lower heating value annual SO<sub>2</sub> emission limit is not expected to be exceeded, even when higher heating value emission rates are assumed. Therefore, the results of the original annual impact analysis do not change and the project annual SO<sub>2</sub> impacts are well below the annual NAAQS.

The proposed changes to Conditions of Certification AQ-28, AQ-30, and AQ-31 will not change the conclusions in the FDOC that the project will not cause or contribute to a violation of the NAAQS or CAAQS.

### 3. *Effect of Requested Administrative Changes and Deletions*

The other proposed changes to Conditions of Certification will not change the conclusions in the analysis that the project will comply with all LORS and will not cause or contribute to a violation of the NAAQS or CAAQS.

## **COMPLIANCE WITH LAWS, ORDINANCES, REGULATIONS AND STANDARDS**

The initial HDPP AFC provided a comprehensive review of the requirements applicable to the facility and a demonstration of compliance. This petition does not change the compliance status with any of the LORS in the Commission Decision. With respect to the proposed administrative change to Conditions of Certification AQ-28, AQ-30, and AQ-31, the impact analysis discussed above does not change the compliance determination with the NAAQS or CAAQS. Additional New Source Review requirements for SO<sub>2</sub>, such as BACT or offsets, are not triggered by the proposed changes to the SO<sub>2</sub> emission calculation methodology.

## **POTENTIAL EFFECTS ON PROPERTY OWNERS AND THE PUBLIC**

The proposed revisions to the CEC Conditions in the Air Quality category will not affect project equipment or the significance of environmental impacts. Therefore, the proposed revisions are not anticipated to affect nearby property owners, the public, or parties in the application proceedings. The list of property owners that surround the HDPP is provided in Table 7 below.

**Table 7**  
**List of Property Owners**

<b>NAME</b>	<b>ADDRESS</b>	<b>TYPE OF BUSINESS</b>
A-1 Recycling	18675 Perimeter Road Victorville, CA 92394	Aircraft Deconstruction
Apple Aero	18308 Readiness Street Victorville, CA 92394	General Aviation Aircraft Repair
Dynadrill, Inc.	13050 Aerospace Drive Victorville, CA 92394	Drilling
Flannery Company	13123 Aerospace Drive Victorville, CA 92394	Book Distributor
G.B. & L.	13117 Aerospace Drive Victorville, CA 92394	Trucking
General Electric	18000 Phantom Victorville, CA 92394	Aircraft Repair
K & S Metal Products & Repair	13600 Phantom Street Victorville, CA 92394	FAA Certified Repair/ Manufacturing Station
KLM Industries	13063 Mustang Road Victorville, CA 92394	Trucking Company

**Table 7  
List of Property Owners**

<b>NAME</b>	<b>ADDRESS</b>	<b>TYPE OF BUSINESS</b>
Kleinfelder, Inc.	18374 Phantom Road Victorville, CA 92394	Environmental Engineers
May Manufacturing	13198 Mustang Street Victorville, CA 92394	Spa Manufacturer
Mercy Air Services	18500 Readiness Street Victorville, CA 92394	Emergency Helicopter Service
Nestle Waters North American Inc.	13456 Fighting Falcon St. Victorville, CA 92394	Bottled Water Distributor
Pasha Group	13236 Mustang Victorville, CA 92394	Freight Forwarding
Southern California Aviation	18384 Readiness Street Victorville, CA 92394	Aircraft Maintenance, Storage & Sales
Stoody	18475 Finance Street Victorville, CA 92394	Welding Supply Wholesale House
Tess's Café (Westwinds Golf Course)	18003 Westwinds Road Victorville, CA 92394	Restaurant
Victorville Aerospace, LLC	13010 Aerospace Drive Victorville, CA 92394	Aircraft Maintenance
West Coast Aerospace	13059 Aerospace Drive Victorville, CA 92394	Thread Roll Die, Thread Manufacturer
Westwinds Golf Course	18003 Westwinds Road Victorville, CA 92394	Recreation / Golf
World of Leisure	13504 Phantom Street Victorville, CA 92394	Luxury Pool Table Manufacturer
World Service West	18590 Readiness Street Victorville, CA 92394	FBO & Security Services
Federal Prison Employment Federal Bureau of Prisons	13289 Air Expressway Victorville, CA 92394	Prison

**SUMMARY OF REQUEST**

As demonstrated in this petition, the requested revisions of the air quality Conditions of Certification are not anticipated to have an adverse effect on the public or the environment. The revisions will not affect compliance with applicable LORS. Accordingly, HDPP requests that the Energy Commission Staff expedite review of this petition, and request Commission approval of the proposed modified conditions in accordance with Title 20 CCR Section 1769 (a)(3).