

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512



July 1, 2010

DOCKET**09-AFC-10**

DATE JUL 01 2010

RECD. JUL 02 2010

Mr. Alan J. De Salvio
Supervising Air Quality Engineer
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392-2310

**Re: Comments on Preliminary Determination of Compliance (PDOC)
Rice Solar Energy Project (09-AFC-10)**

Dear Mr. De Salvio,

Energy Commission staff has reviewed the Mojave Desert Air Quality Management District (MDAQMD, or District) Preliminary Determination of Compliance (PDOC) issued for the Rice Solar Energy Project on June 10, 2010, and has the following comments for your consideration for inclusion in the Final Determination of Compliance (FDOC). Energy Commission staff has been working with MDAQMD staff and has reviewed draft copies of the Rice PDOC. The majority of our comments on the drafts have been addressed; the remaining comments are relatively minor.

NSPS Applicability

Page 19, MDAQMD Regulation IX: The federal New Source Performance Standards (NSPS) 40 Code of Federal Register (CFR) 60 Subpart IIII requirements do apply to the temporary diesel engines and the permanent emergency diesel engines. We recommend replacing "Not applicable" with appropriate text.

Ozone Attainment Status

On page 21, the first bullet under MDAQMD Federal Attainment Status has an apparent typographical error. We recommend that you remove "17" so the amended text would read "Severe Nonattainment for Ozone."

Equipment Descriptions

On page 27, under the equipment description for the group of 173 bhp diesel engines, we understand that this group of temporary diesel engines includes one engine (Application #00010819 in previous drafts of the PDOC) that would drive a water pump rather than an electrical generator. We recommend deleting the term "GENERATOR" from the equipment description or using the term "GENERATOR or WATER PUMP."

On page 30, under equipment description for permanent emergency generators, the fifth line has an apparent typographical error. We recommend that you delete duplicate text "turbo charged, after cooled, operating at TBD rpm, fueled on CARB diesel,"

PROOF OF SERVICE (REVISED 3/4/10) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 7/2/10

TKG

The equipment descriptions for the temporary and permanent diesel engines contain the phrase "with a maximum fuel consumption rate of XXX gph." MDAQMD staff has stated that this information on the maximum fuel consumption rate is included in the equipment description to be descriptive and not prescriptive. To that end, we suggest that the equipment description language for all diesel engines be revised to read "with a maximum rated fuel consumption of XXX gph."

Fuel Meters for Temporary and Permanent Diesel Engines

All of the diesel engines have permit conditions requiring the owner/operator to maintain an operations log for each engine that includes among other information "Calendar year operations in terms of fuel consumption (in gallons) and total hours." Each of the diesel engines also has a permit condition requiring the installation and maintenance of a non-resettable hour timer on each engine to indicate engine operating hours for that engine. However, since there is no corresponding permit condition requiring the installation and maintenance of a fuel meter for each engine, it is not clear what the District will require of the applicant to comply with the fuel consumption reporting condition for each unit.

Removal of Temporary Emissions Sources

The temporary emissions sources are to be removed from the project site at the earliest opportunity. The temporary sources associated with the salt system commissioning are the salt handling system, wet scrubber, baghouse, the 55 MMBtu/hr temporary heater to be used to melt the salt and the 20 MMBtu/hr temporary heater to be used to heat the salt.

The proposed permit conditions set the removal deadline for the salt handling system, wet scrubber and baghouse as "within 60 days of the completion of the salt system commissioning process." The proposed permit conditions for the 20 MMBtu/hr temporary heater and the 55 MMBtu/hr temporary heater (Page 33, Condition #7 and Page 34, Condition # 7, respectively) establish the deadline for their removal as "within 60 days subsequent to power plant start up."

However, the Conclusions section of the PDOC (pages 39 and 40) states that the temporary heaters "will be removed within 60 days of completing the salt system commissioning" which could be earlier than "60 days subsequent to power plant start up."

We recommend that the permit conditions for the removal of the two temporary heaters be revised to match the deadline for their removal given in the recommendations on Pages 39 and 40 (i.e., within 60 days of completing the salt system commissioning). This change would set the same removal deadline for all temporary emission sources associated with the salt system commissioning and would require the removal of the temporary heaters at the earliest opportunity. This change would also eliminate the inconsistency between the removal deadline for the temporary heaters given in the permit conditions and the removal deadline given in the Conclusions section of the PDOC.

Mr. Alan J. De Salvia
July 1, 2010
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Thank you for the opportunity to comment on the Rice Solar Energy Project Preliminary Determination of Compliance. If you have any questions, please contact Brenner Munger of my staff at (916) 654-5139.

Sincerely,

A handwritten signature in black ink that reads "Matthew Layton". The signature is written in a cursive style with a large, prominent initial "M".

MATTHEW LAYTON, Manager
Engineering & Corridor Designation Office
Siting, Transmission and Environmental
Protection Division

cc: Docket



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

**APPLICATION FOR CERTIFICATION
FOR THE RICE SOLAR ENERGY POWER
PLANT PROJECT**

Docket No. 09-AFC-10

**PROOF OF SERVICE
(Revised 3/4/2010)**

APPLICANT

Jeffrey Benoit
Project Manager
Solar Reserve
2425 Olympic Boulevard, Ste. 500 East
Santa Monica, CA 90404
Jeffrey.Benoit@solarreserve.com

APPLICANT'S CONSULTANTS

Andrea Grenier
Grenier and Associates
1420 East Roseville Parkway, Ste. 140-377
Roseville, CA 95661
andrea@agrenier.com

Douglas Davy
CH2MHILL
2485 Natomas Park Drive, Ste. 600
Sacramento, CA 95833
ddavy@ch2m.com

COUNSEL FOR APPLICANT

Scott Galati
Galati & Blek, LLP
455 Capitol Mall, Suite 350
Sacramento, CA 95814
sgalati@gb-llp.com

INTERESTED AGENCIES

California ISO
E-mail Preferred
e-recipient@caiso.com

Liana Reilly
Western Area Power Administration
PO Box 281213
Lakewood CO 80228-8213
reilly@wapa.gov

Allison Shaffer
Bureau of Land Management
Palm Springs/South Coast Field Office
1201 Bird Center Drive
Palm Springs, Ca 92262
allison_shaffer@blm.gov

INTERVENORS

ENERGY COMMISSION

ROBERT WEISENMILLER
Commissioner and Presiding Member
rweisenm@energy.state.ca.us

KAREN DOUGLAS
Chairman and Associate Member
kldougla@energy.state.ca.us

Kourtney Vaccaro
Hearing Officer
kvaccaro@energy.state.ca.us

John Kessler
Siting Project Manager
jkessler@energy.state.ca.us

Deborah Dyer
Staff Counsel
ddyer@energy.state.ca.us

Jennifer Jennings
Public Adviser's Office
publicadviser@energy.state.ca.us

DECLARATION OF SERVICE

I, Teraja` Golston , declare that on, July 2, 2010, I served and filed copies of the attached, Rice Solar Energy (09-AFC-10) - Staff's Comments on MDAQMD's PDOC . The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: **[<http://www.energy.ca.gov/sitingcases/ricesolar>].**

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery;
- by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

_____ sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (***preferred method***);

OR

_____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 09-AFC-10
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Original Signature in Dockets
Teraja` Golston