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July 22, 2008

Mr. Christopher Meyer
Lead Compliance Manager/Archeologist
Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91391

Subject: Air Quality Data Adequacy Items for the Solar Two Project
URS Project/Reference No. 24657106

Dear Mr. Meyer:

URS Corporation (URS) has been alerted by Mr. Joe Loyer of CEC that two aspects of the Solar Two AFC Air Quality section do not conform to CEC Data Adequacy Requirements. This letter describes the actions URS is taking to address each of these issues in order to correct the current deficiencies:

Submittal of Authority to Construct Application to Imperial County Air Pollution Control District

URS has contacted ICAPCD to regarding the permitting requirements for the project. Since Solar Two is a solar power generating facility, the only stationary sources of emissions for the operational project will be the diesel firewater pump engine and diesel emergency generator engine, each of which will normally be operated on a very limited basis for testing and maintenance purposes. Thus, the permit application will consist only of technical specifications for this equipment and completed permit application forms. URS expects to submit the application package to ICAPCD no later than July 25, 2008 and to respond promptly to any subsequent ICAPCD requests for additional information needed to support a finding of completeness.

Protocol for Cumulative Air Quality Analysis

The Air Quality section of the Solar Two AFC did not supply this protocol on the premise (now understood to be erroneous), that no other new or imminent stationary sources of air pollutants are being planned within six miles of the project site. We are now aware that at least one new industrial project within this radius will be applying for permits and should properly be included in the cumulative analysis. The protocol for this analysis consists of the following steps:

(1) Contact ICAPCD and the Imperial County Planning Department to ensure that all new projects within six miles that are currently under construction, currently in the permitting process or expected to enter the permitting process are accounted for.

(2) Prepare a list of all identified projects and recommendations as to which sources should be included in the cumulative modeling analysis.

(3) Submit the list to CEC for review and modify it based on CEC comments.

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(4) With the help of ICAPCD and other County agencies, develop emissions and stack parameter data for characterizing the selected sources in terms of dispersion model input requirements.

(5) Conduct the cumulative modeling analysis using the AERMOD model with all of the identified cumulative sources in addition to the stationary sources of the Solar Two project.

(6) Compare modeled results (plus monitored background pollutant concentrations) with applicable ambient air quality standards to determine the potential significance of cumulative impacts to air quality.

(7) Provide documentation of study methods, input data, assumptions and results to CEC.

URS believes that the Protocol discussion provided above is sufficient for Data Adequacy Purposes and that submittal of the permit application package will enable ICAPCD to determine its completeness within a short time. Please advise me if you have any remaining concerns or questions regarding the adequacy of the air quality analysis of the Solar Two AFC.

Sincerely

URS CORPORATION

John Lague
Senior Air Quality Consultant

JSL:kl

cc Joe Loyer (CEC), Angela Leiba (URS), Corinne Lytle (URS)