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August 28, 2008

DOCKET
05-AFC-3
DATE AUG 28 2008
RECD. SEP 10 2008

Mr. Ken Coats
Air Quality Engineer
Engineering and Compliance
South Coast Air Quality Management Agency
21865 Copley Drive
Diamond Bar, Ca 91765-4178

Subject: NSR PM 2.5 Requirements
Valle Del Sol, LLC (146534)

Dear Mr. Coats:

Through a July 29, 2008 letter, Mr. Mohsen Nazemi, requested information documenting that this facility's potential to emit would not exceed 100 tons of PM2.5 per year after installation of the proposed equipment. Mr. Nazemi's letter indicates that Appendix S of the Final NSR Rule for PM2.5 would not apply if a facility's projected emissions are less than 100 tons per year.

As you know, SCAQMD's Final Determination of Compliance and Draft Permit was issued for this facility on April 29, 2008. Within this FDOC and its Engineering Analysis / Evaluation, the maximum projected emission rates are presented (Pg 20) as 105,593 lbs/year of PM10. This converts to 52.8 tons / year of PM10. Since PM2.5 is a subset of the PM10 emissions, the facility's projected emissions are well below 100 tons per year.

Please contact me on any further questions.

Sincerely,

Victor Yamada
Director, Environmental, Health & Safety.

Attachment: Page 20, SCAQMD SVEP Engineering Analysis / Evaluation

Copy: Mike Mills, SCAQMD
Robert Worl, CEC
Greg Darvin, Atmospheric Dynamics
Tom McCabe, Edison Mission Energy

Edison Mission Energy
18101 Von Karman Avenue
Suite 1700
Irvine, CA 92612 1046

Mass Emission Rates, lb/year (Commissioning Year)

	Emissions, lb/year					
LMS100PA CTG	NOx	CO	VOC	SO_2	PM_{10}	NH_3
Normal Operations	108,125.00	158,040.00	30,030.00	7,980.00	79,020.00	79,939.42
Start up	18,235.00	35,700.00	4,920.00	1,060.00	10,500.00	N/A
Shutdown	19,250.00	49,000.00	5,250.00	1,060.00	10,500.00	N/A
Commissioning	47,710.00	48,640.00	1,880.00	228.00	2,690.00	N/A
Emergency Fire Pump	2,097.46	67.06	22.35	0.82	13.41	N/A
5-Cell Cooling Tower	N/A	N/A	N/A	N/A	1,539.60	N/A
TOTALS	**195,417.46**	**291,447.06**	**42,104.63**	**10,327.82**	**104,263.01**	**79,939.42**

Emissions During A Non-Commissioning Year

The tables below show the cumulative emissions during a non-commissioning year from all 5 gas turbines which includes, start-up, shutdown and normal operation, as well as the emissions from the emergency fire pump which is assumed to operate for the designated maximum of 199 hours per year, and the PM_{10} emissions from the 5-cell cooling tower.

Mass Emission Rates, lb/hr (Non-Commissioning Year)

	Emissions, lb/hr					
LMS100PA CTG	NOx	CO	VOC	SO_2	PM_{10}	NH_3
Normal Operations	41.05	60.00	11.40	3.03	30.00	30.35
Start up	52.10	102.00	14.05	3.03	30.00	N/A
Shutdown	55.00	140.00	15.00	3.03	30.00	N/A
Emergency Fire Pump	10.54	0.337	0.112	0.0041	0.067	N/A
5-Cell Cooling Tower	N/A	N/A	N/A	N/A	0.443	N/A
TOTALS	**158.69**	**302.34**	**40.56**	**9.09**	**90.51**	**30.35**

Mass Emission Rates, lb/month (Non-Commissioning Year)

	Emissions, lb/month					
LMS100PA CTG	NOx	CO	VOC	SO_2	PM_{10}	NH_3
Normal Operations	15,720.00	22,980.00	4,365.00	1,161.49	11,490.00	11,625.29
Start up	2,084.00	4,080.00	562.00	121.20	1,200.00	N/A
Shutdown	2,200.00	5,600.00	600.00	121.20	1,200.00	N/A
Emergency Fire Pump	174.79	5.59	1.86	0.07	1.12	N/A
5-Cell Cooling Tower	N/A	N/A	N/A	N/A	128.30	N/A
TOTALS	**20,178.79**	**32,665.59**	**5,528.00**	**1,403.96**	**14,019.42**	**11,625.29**

Mass Emission Rates, lb/year (Non-Commissioning Year)

	Emissions, lb/year					
LMS100PA CTG	NOx	CO	VOC	SO_2	PM_{10}	NH_3
Normal Operations	113,626.40	166,080.00	31,555.00	8,387.00	83,040.00	83,945.03
Start up	18,235.00	35,700.00	4,920.00	1,060.00	10,500.00	N/A
Shutdown	19,250.00	49,000.00	5,250.00	1,060.00	10,500.00	N/A
Emergency Fire Pump	2,097.46	67.06	22.35	0.82	13.41	N/A
5-Cell Cooling Tower	N/A	N/A	N/A	N/A	1,539.60	N/A
TOTALS	**153,208.86**	**250,847.06**	**41,747.35**	**10,507.82**	**105,593.01**	**83,945.03**

~~Strikethroughs~~ and underlines indicate changes from the PDOC dated January 1, 2008