

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <i>ENGINEERING DIVISION</i>  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGES 2	PAGE 1
	APPL. NO. See Below	DATE 8/4/2011
	PROCESSED BY Andrew Lee	CHECKED BY

**Minor Permit Revision**

**COMPANY NAME AND ADDRESS**

Los Angeles Department of Water and Power  
111 North Hope Street, Room 1050  
Los Angeles, CA 90012

Contact: Bruce Moore (213) 367-0443

**EQUIPMENT LOCATION**

LA City, DWP Haynes Generation Station  
6801 2<sup>nd</sup> Street  
Long Beach, CA 90803  
SCAQMD ID #800074

**EQUIPMENT DESCRIPTION**

Section H of the Facility Permit, ID# 800074, Permit to Construct and Temporary Permit to Operate:

Please see attachment for Equipment Description on Draft permit dated, August 3, 2011.

**BACKGROUND**

Los Angeles Department of Water and Power – Haynes Generating was issued a Title V permit on December 29, 2010 to allow the installation of six identical General Electric, gas turbines that are each rated at 906.6 mmBtu/hr, natural gas fired, Model LMS100PA, intercooled with water injection systems. Those turbines were designated Unit 11 through 16. The installation of the turbines was part of the overall repowering project for the Los Angeles Department of Water and Power. As part of the environmental review, in particular the Prevention of Significant Deterioration, in AQMD Regulation XVII, Rule 1703 covers analysis on visibility, soil and vegetation (1703(a)(3)(E)). During the review process, the U.S. Forest Service (USFS) provided comments after reviewing the PSD analysis performed by LADWP. They expressed a concern about the short term impacts due to rapid startups and shutdowns, and proposed the following condition that was added as Condition E193.8:

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“Within 4 months of the issuance of Permit to Construct, the Permittee will sign an existing Collection Agreement with the U.S. Forest Service to participate in a post PSD visibility monitoring project, the results of which will be used to establish a visibility baseline in nearby Class I Areas.”

On May 6, 2011, an administrative revision was submitted to EPA allowing a request by LADWP to extend the 4 month time line to sign an existing Collection Agreement by 90 days. This time extension was to allow sufficient time for both of the agencies, LADWP and USFS, to obtain the necessary management approvals for the Agreement. The condition was modified to:

E193.8 The equipment is subject to the applicable requirements of the following rules:

Within 4 7 months of the issuance of Permit to Construct, the Permittee will sign an existing Collection Agreement with the U.S. Forest Service to participate in a post PSD visibility monitoring project, the results of which will be used to establish a visibility baseline in nearby Class I Areas.

This current request is asking for another extension of the time line by an additional 4 months which will end on November 29, 2011. This time extension is requested due to the agencies legal departments finding unforeseen legal complications that need to be remedied before signing of the Agreement.

**RECOMMENDATION**

Based upon the above circumstances and the concurrence from both USFS and LADWP, and that there will be no emissions impact it is recommended that we modify condition E193.8 as follows:

E193.8 The equipment is subject to the applicable requirements of the following rules:

Within 7-11 months of the issuance of Permit to Construct, the Permittee will sign an existing Collection Agreement with the U.S. Forest Service to participate in a post PSD visibility monitoring project, the results of which will be used to establish a visibility baseline in nearby Class I Areas.