BEFORE THE ENVIRONMENTAL APPEALS BOARD UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C.

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In re:

Palmdale Energy, LLC Palmdale Energy Project

Appeal No. PSD 18-01

PSD Permit No. SE 17-01

CERTIFIED INDEX TO THE ADMINISTRATIVE RECORD

I, Elizabeth Adams, am the Acting Director of the Air Division for EPA Region 9 ("Region 9"). I certify that the attached index lists the documents constituting the administrative record required by 40 C.F.R. 124.18 for Region 9's final Prevention of Significant Deterioration permit issued to Palmdale Energy, LLL for the Palmdale Energy Project, which is the subject of the above-captioned petition for review.

In witness whereof, I have signed my name this $\frac{13}{13}$ day of June, 2018 at San Francisco, California.

Elizabeth Adams Air Division U.S. Environmental Protection Agency, Region 9

Notes: (1) Copyrighted materials that are not already publicly available are not posted in the online docket. Such materials are labeled "*Copyrighted*" in this index. A copy of all such materials has been retained as part of the EPA's record for this action. (2) Certain electronic documents are not compatible with the online docket system and have been posted to the EPA's webpage for this project here: <u>https://www.epa.gov/caa-permitting/palmdale-energy-project-prevention-significant-deterioration-psd-permit</u>. Such documents are labeled "*Available on EPA's website*" and includes the above hyperlink to the material. (3) Other documents that are not or may not be appropriate for public release, such as documents including (a) information claimed as confidential business information, (b) personal identifying information when the particular person was not or may not have been redacted or not posted on the online docket for this action. All such documents are listed in this index and labeled accordingly. The original version of these documents is retained as part of the EPA's record for this action, and only the redacted version, where applicable, is posted to the online docket.

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7.14	Fluor Corporation: Dominion Virginia Greensville County Power Station	Accessed 8/16/2017
7.15	CPV: Towantic Energy Center	Accessed 8/16/2017
7.16	Final Determination of Compliance for the Huntington Beach Energy Project, South Coast Air Quality Management District - Pages 252-253	Nov 2016
7.17	Clean Air Technology Center Fact Sheets for Cyclones, Wet Scrubbers, ESPs, and Baghouses	2003
7.18	Comment and Response 40 in the Responses to Public Comments on the Proposed Prevention of Significant Deterioration Permit for the Palmdale Hybrid Power Plant, pages 39-40	10/18/2011
7.19	75-MW CSP Plant to be Built in Florida, <i>Renewable Energy World</i>	3/27/2009
7.20	Integrated solar combined cycle (ISCC), Wikipedia	Accessed 8/16/2017
7.21	Final Determination of Compliance for the Huntington Beach Energy Project, South Coast Air Quality Management District - Pages 10, 265, footnote 1	Nov 2016

7.22	Final Determination of Compliance, AES Alamitos, South Coast Air Quality Management District, page 268	Nov 2016
7.23	The End of the Era of Baseload Power Plants, Green Tech Media	6/29/2016
7.24	As Solar Pushes Electricity Prices Negative, 3 Solutions for California's Power Grid, Inside Climate News	6/14/2017
7.25	BACT Determinations, FPL Martin Power Plant, Unit 8 Combined Cycle Project, Florida Department of Environmental Protection, page 4	4/10/2003
7.26	EPA Technical Support Document for Docket EPA-HQ-OAR-2013-0495, Literature Survey of Carbon Capture Technology	7/10/2015
7.27	EPA's NSR Workshop Manual, DRAFT at B.7	Oct 1990
7.28	GE Unveils World's First Battery Storage & Gas Turbine Hybrid with Southern California Edison, <i>Current</i>	10/4/2016
7.29	Taking Charge: GE Bundles Batteries with Largest Steam and Gas Turbines, <i>GE Reports</i>	6/12/2017
7.30	Enhancing gas turbine power generation with battery storage, Siemens	undated
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7.32	EPA's NSR Workshop Manual, DRAFT at B.37	Oct 1990
7.33	EPA's SCR Cost Control Manual, Spreadsheet, Data Inputs Tab	2016
7.34	How Does an Oxidation Catalyst Work?, NETT Technologies	2017
7.35	Low-Temperature Oxidation/ Reduction Catalysts, Technology Transfer Program, NASA	Accessed 8/16/2017
7.36	EPA's Alternative Control Techniques Document: Stationary Diesel Engines, Tables 5-2, 5-3, 5-4	Mar 2010
7.37	SF6 Emission Reduction Partnership for Electric Power Systems	6/6/2017
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7.53	Federal Land Manager's Air Quality Related Values Workbook (FLAG), Phase 1 Report-Revised 2010	Oct 2010
7.54	A Screening Procedure for the Impacts of Air Pollution Sources on Plants, Soils, and Animals, EPA 450/2-81-078	1/12/1980
7.55	Workbook for Plume Visual Impact Screening and Analysis (Revised), EPA, EPA-454/R-92-023	1992
7.56	A Look at the New Battery Storage Facility in California Built with Tesla Powerpacks, <i>ARS Technica</i>	1/31/2017
7.57	5 Battery Energy Storage Projects to Watch in 2016, Utility Dive	11/30/2015
7.58	The Texas Energy Storage Market: A Four-Part Examination, <i>Emerging</i> Energy Insights Blog, lexology.com	10/18/2016
7.59	NEC Energy Solutions Provides First Utility-Scale Battery Energy Storage Project in Massachusetts, <i>Energy Storage News</i>	10/17/2016
7.60	CAISO Battery Storage Trial, The Grid Optimization Blog, T&D World	11/21/2016
7.61	Battery Storage Technologies, Applications and Trend in Renewable Energy, 2016 IEEE International Conference on Sustainable Energy Technologies	2016

7.62	List of energy storage projects, Wikipedia	Accessed 8/16/2017
7.63	A Look at the Biggest Energy Storage Projects Built Around the World in the Last Year, <i>Energy Storage</i> , Greentechmedia.com	2/3/2016
7.64	World's Largest Storage Battery Will Power Los Angeles, <i>E&E News - Energy</i> , ScientificAmerica.com	7/7/2016
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11.2	Additional Comments from Jackie Ayer, including Attachments	8/5/2017
11.3	Comment Letter from Linda Sheppard	8/30/2017
11.4	Written Comments from Jack Ehernberger Submitted at the Public Hearing	9/21/2017
11.5	Comments from G. Darvin, Atmospheric Dynamics, on behalf of the Applicant	10/6/2017
11.5.1	Email from G. Darvin to L. Beckham Transmitting Comments	10/6/2017
	Comments from L. Belenky and R. Ukeiley, Center for Biological Diversity,	
11.6	on behalf of several conservation groups, including exhibits and transmittal	10/6/2017
	email	
11.7	Comments from Jack Ehernberger submitted via email	10/7/2017
11.8	Public Hearing Transcript for Proposed Permit	9/21/2017
11.9	Comments from Lee Clauss, Director Cultural Resources Management, San	8/30/2017
	Manual Band of Mission Indians	0/00/2017
	Section 12 - Material Cited in Response to Comments	
12.1	Annual Network Plan Covering Monitoring Operations in 25 California Air	Jul 2017
12.2	Districts, California Air Resources Board (Appendices omitted) NAAQS Table, U.S EPA Website Publication	12/20/2016
12.2	Excerpt from Final Commission Decision, California Energy Commission,	12/20/2010
12.3	Palmdale Energy Project Amendment, including Section VI.D Noise and	Aug 2017
12.5	Vibration	1 ay 2017
12.4	Etherington, Darrell, Tesla will build world's largest battery storage facility for Australian wind farm, TechCrunch	7/7/2017
12.5	Memorandum from L. Beckham to PEP PSD Permit File, Summary of Air Permits Office Trip to Southern California Agencies and Industrial Facilities	3/6/2018

12.6	Application of Life-Cycle Assessment to Nanoscale Technology: Lithium-ion Batteries for Electric Vehicles, Design for the Environment Program, EPA's Office of Pollution Prevention and Toxics, National Risk Management Research Laboratory, EPA's Office of Research and Development, EPA 744- R-12-001	4/24/2013
12.7	Price, Emily, Elon Musk's New Battery Just Won Him a \$50 Million Bet, Fortune	11/23/2017
12.8	Electric Power Monthly, Table 5.6.A. Average Price of Electricity to Ultimate Customers by End-Use Section, U.S. Energy Information Administration	2/27/2018
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12.10	EIA Publishes Construction Cost Information for Electric Power Generators, U.S. Energy Information Administration	6/6/2016
12.11	Hawaii Energy Facts & Figures, State of Hawaii Department of Business, Economic Development and Tourism and Hawaii State Energy Office	Nov 2014
12.12	Siemens Website Publication for SGT6-6000G: High Power Density, High Efficiency	Accessed 3/8/2018
12.13	Siemens Website Publication for SGT6-8000H Heavy Duty Gas Turbine	Accessed 3/8/2018
12.14	PSD Permit for La Paloma Energy Center, PSD Permit Number PSD-TX- 1288-GHG, U.S. EPA Region 6	11/6/2013
12.15	Website Publication for The Isle magazine, Freeport LNG Marks Three Years of Liquefaction Project Construction	Dec 2017
12.16	How to License NASA Technology, NASA Technology Transfer Program Website	Accessed 3/8/2018
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12.18	Burton, C.S., T.E. Stoeckenius and J.P. Nordin, 1983. Final Report: The Temporal Representativeness of Short-Term Meteorological Data Sets: Implications for Air Quality Impact Assessments. Systems Applications, Inc., San Rafael, CA	5/9/1983
12.19	Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program, Peter Tsirigotis, Director, OAQPS, EPA	4/17/2018
12.20	Technical Basis for the EPA's Development of the Significant Impact Thresholds for $PM_{2.5}$ and Ozone	April 2018

12.21	Appendix: Technical Basis for the EPA's Development of the Significant Impact Thresholds for $\rm PM_{2.5}$ and Ozone	April 2018
12.22	Legal Memorandum, Application of Significant Impact Levels in the Air Quality Demonstration for Prevention of Significant Deterioration Permitting under the Clean Air Act	4/17/2018
12.23	Air Trends, Carbon Monoxide Trends, U.S. EPA Website	Accessed 3/8/2018
12.24	Carbon Monoxide (1971) Designated Area/State Information, Green Book, U.S. EPA Website	Accessed 3/12/2018
12.25	The Influence of Engine Start and Stop on Total Emission from Natural Gas Fired CHP Engines, Torben Kvist Jensen, Danish Gas Technology Centre, Denmark	2008
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12.30	Letter from Douglas M. Costle, EPA Administrator to Senator Jennings Randolph, Chairman, Committee on Environment and Public Works, United States Senate, Re: Ambient Air Definition	12/19/1980
12.31	Email exchange between G. Darvin, Atmospheric Dynamics, C. Anderson, Mojave Desert Air Quality Management District, and L. Beckham, EPA, Re: Confirmation of Plant 42 Fenceline/Receptors for PEP Modeling	3/8/2018
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12.39	National Ambient Air Quality Standards for Particulate Matter, 78 FR 3086, Final Rule, EPA	1/15/2013
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12.42	Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements, 81 FR 58010, Final Rule, EPA	8/24/2016
12.43	Standards of Performance for Greenhouse Gas Emissions from New, Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units, 80 FR 64510, Final Rule, EPA	10/23/2015
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12.45	Credible Evidence Revisions, 62 FR 8314, Final Rule, EPA	2/24/1997
	Section 13 - Final Permit Documents and Notifications	
13.1	Final PSD Permit, PSD Permit: SE 17-01, Permittee: Palmdale Energy, LLC, Source Name: Palmdale Energy Project	4/25/2018
13.2	Response to Public Comments on Proposed Prevention of Significant Deterioration Permit, Palmdale Energy Project	April 2018
13.2.1	Unofficial Redline-Strikeout Version of the Palmdale Energy Project Final PSD Permit Decision Showing Changes from the Proposal	April 2018
13.3	Letter to Applicant, Re: Final Permit Decision for Palmdale Energy Project, PSD Permit SE 17-01	4/25/2018
13.3.1	Email transmittal from L. Beckham to T. Johns of the Final PSD Permit	4/26/2018
13.4	Announcement of Final Permit Decision for the Palmdale Energy Project PSD Permit - English and Spanish	4/26/2018

13.5	Redacted General Email to Electronic Public Notice Distribution List Providing Notice of the Final Permit Decision - English	4/26/2018
13.5.1	General Email to Electronic Public Notice Distribution List Providing Notice of the Final Permit Decision (Original – not publicly available)	4/26/2018
13.6	Redacted General Email to Electronic Public Notice Distribution List Providing Notice of the Final Permit Decision - Spanish	4/26/2018
13.6.1	General Email to Electronic Public Notice Distribution List Providing Notice of the Final Permit Decision – Spanish (Original – not publicly available)	4/26/2018
13.7	Names on EPA's Electronic Public Notice Distribution List Announcing the Final Permit Decision (does not include contact information, or individuals that do not provide their name when requesting notification)	4/26/2018
13.8	Redacted USPS Mailing List Providing Notice of Final Permit Decision	4/26/2018
13.8.1	USPS Mailing List Providing Notice of Final Permit Decision and a Public Hearing (Original - not publicly available)	4/26/2018