



Maricopa County

Air Quality Department

Office of the Director
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September 2, 2011

Roger Ferland
Quarles & Brady
One Renaissance Square.
Two North Central Ave.
Phoenix, Arizona 85004-2391

Re: Mesquite Solar Facility

Dear Mr. Ferland:

A recent inspection of the Mesquite Generating Station owned and operated by Sempra Energy has raised the issue of whether the solar facility being constructed by Mesquite Solar, LLC, approximately 3 miles away, should be included in the Title V permit held by the generating station. Based on a review of the two operations, the Maricopa County Air Quality Department has determined that the two operations are not contiguous or adjacent for the purposes of Title V or New Source Review and are separate sources.

The Mesquite Solar plant is approximately 2.9 miles from the Mesquite Generating Station. The solar plant will consist of fixed flat panel photo voltaic solar collectors. There will be no emitting facilities at the solar plant. The only anticipated emissions from the facility are fugitive dust from vehicle movement when the solar panels are being cleaned or serviced. There will be a 230 kV power line that runs from the solar plant to the switch yard at the Mesquite Generating Station; however, the connection to the Mesquite switch yard is simply THE most convenient point of access to the power grid. The connection is not to support an additional step in a manufacturing process. Most significantly, the power generated by the solar plant will be sold to PG&E under a contract separate from any of the power generated at the Mesquite Generating Station. Thus, the output from each facility is separate and does not depend in any way on output from the other.

This decision is further supported by US EPA's treatment of fugitive emissions from collocated sources for both Title V and NSR. In a memorandum from Lydia Wegman of the Office of Air Quality Planning and Standards dated June 2, 1995, the agency decided to not consider fugitive emissions from collocated sources towards the major source threshold for Title V. Thus, given the nature of the emissions from

the Mesquite Solar facility, even if the two facilities were considered to be collocated there would be no additional regulation or reduction of emissions.

The Maricopa County Air Quality Department has previously determined that the service road for the electric water pumps on the Mesquite property did not need to be included in the Title V permit for the Mesquite Generating Station due to the lack of emitting facilities. Mesquite has committed to reduce emissions from the road by installation of an engineered surface. Sempra is encouraged to take all reasonable steps to minimize fugitive dust emissions from the solar plant.

Sincerely,



William Wiley, Director
Maricopa County Air Quality Department

Cc: Kevin Costello