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OF COUNSEL:
RONALD LIEBERT

February 22, 2013

Bruce Boyer
Compliance Project Manager
09-AFC-2C
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**RE: TURLOCK IRRIGATION DISTRICT ALMOND 2 POWER PLANT -
CONDITION OF CERTIFICATION AQ-SC6, AIR PERMIT
MODIFICATIONS SUBMITTED TO SJVAPCD FOR CONDITIONS AQ-
41 & AQ-47**

Dear Mr. Boyer:

On December 19, 2012 the Turlock Irrigation District (TID) submitted to the San Joaquin Valley Air Pollution Control District (SVAPCD) an Application for Minor Modifications to the air permits for the Almond 2 Power Plant (A2PP). Specifically, the proposed modifications seek minor revisions to Conditions AQ-41 and AQ-47. Condition of Certification AQ-SC6 requires that TID submit to the California Energy Commission for review and approval, any proposed air permit modifications submitted to the SVAPCD within five working days of submission. Please find attached hereto, TID's Application for Minor Modifications to the SVAPCD for proposed revisions to Conditions AQ-41 and AQ-47.

Condition AQ-41 requires startup and shutdown testing of the gas turbines every seven years. Based on discussions with SVAPCD staff and a review of other permits for facilities with multiple identical gas turbines, TID believes the intent of this condition was to require the testing of one representative gas turbine every seven years; however, a literal reading of the three permits would require testing of all three turbines. TID is requesting that Condition AQ-41 be revised to allow testing of a single representative turbine.

In addition, Condition AQ-47 requires the use of a "non-resettable, totalizing" fuel flow meter on each gas turbine to measure the amount of natural gas combusted. TID is concerned that the requirement for a "non-resettable, totalizing" flow meter is not consistent with the fuel flow meter technology that must be used to comply with the fuel metering requirements under 40 CFR Part 75 and the continuous emissions monitoring requirements under 40 CFR Part 60. TID

Bruce Boyer
February 22, 2013
Page 2

requests that Condition AQ-47 be revised to delete the requirement that the fuel flow meter be non-resettable and totalizing.

This filing is consistent with the requirements of Section 1769 of the California Energy Commission regulations. Specifically, the information presented herein provides a complete description of the proposed modifications, including the new language for the affected Conditions AQ-41 and AQ-47, as required by Section 1769(a)(1)(A). This filing also includes a discussion of the necessity of the proposed changes, per Section 1769(a)(1)(B). This filing is based on information that was not known during the time of the certification, and it does not undermine the assumptions, rationale, findings, or other bases for the final decision, per Sections 1769(a)(1)(C) and 1769(a)(1)(D). As discussed above, the minor modifications to the AQ-41 and AQ-47 condition language do not have the potential to create any significant impacts on the environment, and the project remains consistent with all applicable LORS, per Sections 1769(a)(1)(E) and 1769(a)(1)(F). The proposed revisions will not adversely affect the public, per Section 1769(a)(1)(G). In addition, the proposed revisions will have no adverse effects on nearby property owners, per Section 1769(a)(1)(H) and 1769(a)(1)(I).

Should you have questions, please do not hesitate to contact me at 916-447-2166.

Sincerely,



Jeffery D. Harris
Greggory L. Wheatland
Ellison, Schneider & Harris L.L.P.

Attorneys for TID

Attachment: Petition for Amendment No. 1

**Petition to Amend Air Quality Conditions of Certification
for the Almond 2 Power Project
(09-AFC-2)**

Amendment No. 1

Submitted to:

California Energy Commission

Submitted by

Turlock Irrigation District

February 2013

**Petition to Amend Air Quality Conditions of Certification
for the Almond 2 Power Project
(09-AFC-2)
Amendment No. 1**

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Executive Summary

Turlock Irrigation District (TID), as project owner, petitions the California Energy Commission (CEC or Commission) to amend the certification for the Almond 2 Power Plant (A2PP) (09-AFC-2, issued December 15, 2010). This Amendment includes the components described below.

- Modification of Condition of Certification AQ-41 to clarify that this condition may be satisfied by startup and shutdown testing of a single representative turbine every seven years, and that it does not require testing of all three turbines.
- Modification of Condition of Certification AQ-47 to delete the requirement that the fuel flow meter on each gas turbine be “non-resettable and totalizing” in order to avoid inconsistency with the continuous emissions monitoring requirements under 40 CFR Part 60 and the fuel metering requirements under 40 CFR Part 75.

Section 1.0 provides an overview of the Amendment and a review of the ownership of the project. Section 2.0 provides a complete description of the proposed modifications and the necessity for the proposed changes. Section 3.0 assesses the potential environmental effects of the proposed changes; the project’s continued compliance with all laws, ordinances, regulations and standards (LORS); and the consistency of the changes with the Commission Decision (Decision) certifying the facility. This assessment indicates that adoption of the Amendment will not result in any significant, unmitigated adverse environmental impacts, and that the project will continue to comply with all applicable LORS. Section 4.0 addresses potential effects on the public, and Section 5.0 assesses potential effects on property owners. Section 6.0 describes the proposed changes to Conditions of Certification AQ-41 and AQ-47.

1.0 Introduction

1.1 Overview

The Almond 2 Power Plant is an approximately 174 megawatt natural-gas fired, simple-cycle peaking generating facility located at 4500 Crows Landing Road, in Stanislaus County approximately 5 miles south of Modesto, California. Primary equipment consists of three identical 58 MW General Electric Energy LM6000PG turbines. The A2PP is owned by Turlock Irrigation District, and was certified by the Commission in December 2010.¹

By this Amendment, TID petitions the Commission to amend the certification for the project as follows:

- Modify Condition of Certification AQ-41 to clarify that this condition may be satisfied by startup and shutdown testing of a single representative turbine every seven years, and that it does not require testing of all three identical turbines.
- Modify Condition of Certification AQ-47 to delete the requirement that the fuel flow meter on each gas turbine be “non-resettable and totalizing” in order to avoid [inconsistency](#) with the continuous emissions monitoring requirements under 40 CFR Part 60 and the fuel metering requirements under 40 CFR Part 75 .

On December 19, 2012, TID submitted these changes to the San Joaquin Valley Air Pollution Control District (SJVAPCD) in an Application for Minor Modifications to the air permits for the A2PP (Permit Nos. N-3299-4-0, ‘-5-0, ‘-6-0). The application has been deemed complete by the SJVAPCD and is currently under review. A copy of the application is provided as Attachment A.

In order to comply with Condition of Certification AQ-SC6 of the A2PP certificate, and Section 1769 of the Commission’s siting regulations, 20 CCR § 1001 et seq. (Siting Regulations),² TID submitted a copy of the SJVAPCD Application and a detailed description of the proposed amendments to the Commission. On January 8, 2013, TID received an email communication from the Commission acknowledging receipt of the AQ-SC6 compliance filing and instructing TID to submit its request as a formal Amendment.

This Amendment contains all of the information that is required pursuant to Section 1769 of the Siting Regulations.

1.2 Summary of Environmental Impacts

Section 1769(a)(1)(E) of the Commission’s Siting Regulations requires an analysis of the impacts, if any, that a proposed modification in project design, operation, or performance requirements may have on the environment, and proposed measures to mitigate any significant adverse impacts. Section 1769(a)(1)(F) of the Siting Regulations also requires a discussion of the impact of the modification on the facility’s ability to comply with LORS.

¹ California Energy Commission, 2010, Commission Decision, Almond 2 Power Plant Project, (09-AFC-2)

² Title 20, California Code of Regulations, Section 1769 (Post Certification Amendments and Changes).

As discussed below in Section 3.0, the two proposed changes are minor modifications of air quality Conditions of Certification. TID concludes that these proposed changes will have no significant environmental impacts. With respect to the impact of the proposed modifications on applicable laws, ordinances, regulations and standards, the modification of AQ-41 will have no impact on compliance with all applicable LORS. The modification of AQ-47 will have the positive impact of ensuring consistency with the federal emissions monitoring and fuel metering requirements in 40 CFR Parts 60 and 75, while having no impact on compliance with any other applicable LORS.

2.0 Description of Project Changes

Consistent with Sections 1769(a)(1)(A) and (B) of the Siting Regulations, this section includes a complete description of the proposed modification as well as a discussion of the necessity for the proposed amendments. Consistent with Section 1769(a)(1)(C) and (D) of the Siting Regulations, this section explains that TID was unaware of the need for these two minor modifications prior to certification of A2PP, and that the modifications are not based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision.

2.1 Condition of Certification AQ-41 (Source Testing)

Condition AQ-41 requires startup and shutdown testing of the A2PP project gas turbines every seven years. Based on discussions with SJVAPCD staff and a review of other permits for facilities with multiple identical gas turbines, it appears that the intent of this condition is to require the testing of one representative gas turbine every seven years. However, a literal reading of the three air permits and AQ-41 would require testing of all three turbines. TID requests that the Commission revise AQ-41 to explicitly allow testing of a single representative turbine. Suggested revisions to AQ-41 are provided in underline below:

Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted before the end of the commissioning period and at least once every seven years thereafter on one of the three turbines (N-3299-4-0, '-5-0 or '-6-0). CEM relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing on one of the three gas turbines shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the once every seven years schedule. [District Rule 1081]

The A2PP turbines are simple-cycle units that start up—that is, come into compliance with their routine emission limits—in less than 30 minutes. This very short startup period makes it difficult, if not impossible, to obtain meaningful source test results with one-hour test runs. Consequently, multiple startups are necessary to complete testing, resulting in excessive turbine wear. In addition, because the gas turbines are identical, the startup and shutdown test results from one gas turbine can be used to verify compliance for all three units. The Environmental

Protection Agency (EPA) has used emission test results from a single gas turbine to demonstrate compliance with new source performance standards (NSPS) limits for identical turbines in several instances. See, for example, test waiver approval letters from EPA Region 4,^{3,4} Region 6,⁵ and Region 10.⁶ Therefore, testing all three turbines during startup and shutdown would cause unnecessary wear on the turbines and would not provide additional significant or meaningful data.

This proposed change does not relax monitoring, recordkeeping, or reporting requirements, as these conditions would be unaffected. TID would still be required to continuously monitor and record emissions from each gas turbine, including during startup, using the continuous emissions monitoring systems (CEMS), and to maintain records of measurements. The requested change also does not affect TID's obligation to operate the CEMS in compliance with the applicable requirements of 40 CFR Parts 60 and 75.

TID was not aware of the need for this modification at the time the certificate was approved in December 2012. As noted previously, TID has submitted a request to SJVAPCD for an identical change in the A2PP project air permits.

2.2 Condition of Certification AQ-47 (Fuel Flow Meter)

Condition of Certification AQ-47 requires the use of a “non-resettable, totalizing” fuel flow meter on each gas turbine to measure the amount of natural gas combusted. TID is concerned that the requirement for a “non-resettable, totalizing” flow meter is not consistent with the fuel flow meter technology that must be used to comply with the fuel metering requirements under 40 CFR Part 60. That is, Part 60 does not require a “non-resettable, totalizing” flow meter but rather only requires the meter be “installed, calibrated, maintained, and operated according to the manufacturer's instructions” (see 60.4345(c)). TID requests that the Commission revise Condition of Certification AQ-47 to delete the requirement that the fuel flow meter be non-resettable and totalizing, as follows:

A ~~non-resettable, totalizing~~ mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201 and 4703]

Non-resettable totalizing fuel meters are commonly used on emergency engines and propane tanks, but fuel use in gas turbines is measured and totalized through the computerized data acquisition and handling system that processes and performs calculations using fuel flow meter data and other data collected by the CEMS. In the event of a power or computer system outage, the flow meters reset to zero because the fuel flow signal is lost. However, the fuel use data records are maintained in long-term storage, so the records of the amount of fuel used are unaffected. The fuel meters and associated data acquisition and handling system provide a permanent, cumulative record of fuel use in each gas turbine, and so comply with the intent of

³ <http://cfpub.epa.gov/adi/pdf/adi-nsps-0600086.pdf>

⁴ <http://cfpub.epa.gov/adi/pdf/adi-nsps-0500103.pdf>

⁵ <http://cfpub.epa.gov/adi/pdf/adi-nsps-9600019.pdf>

⁶ <http://cfpub.epa.gov/adi/pdf/adi-nsps-0300088.pdf>

the condition. However, the type of fuel metering systems used with gas turbine CEMS is not “non-resettable” and “totalizing” in the traditional sense. To avoid potential confusion, TID requests that the Commission modify the language of AQ-47 as proposed.

The acid rain regulations in 40 CFR Part 75 (Section 2.1 of Appendix D) require the use of a certified fuel flow meter to continuously monitor the fuel flow rate. Section 2.1.5 requires initial certification that a fuel flow meter meets a flow meter accuracy of 2.0% of the upper range value across the range of fuel flow rate to be measured at the unit. Section 2.1.6 further requires quality assurance testing every four quality assurance operating quarters (i.e., annually for most units) to confirm that the fuel flow meter still meets the 2.0% accuracy threshold. The acid rain regulations do not require the use of non-resettable or totalizing fuel meters.

The proposed change does not relax any monitoring condition because it does not alter or eliminate the need to install, utilize, and maintain a fuel flow meter on each gas turbine, or to record and maintain records of fuel use in each gas turbine. The proposed change also does not affect the Part 75 requirements to continuously monitor the fuel flow rate to each turbine using a calibrated fuel flow meter.

TID was not aware of the need for this modification at the time the certificate was approved in December 2012. As noted previously, TID has submitted a request to SJVAPCD for an identical change in the A2PP project air permits.

3.0 Environmental Analysis of Proposed Amendments

Consistent with Sections 1769(a)(1)(E) and (F), the environmental impact and the impact on LORS of the proposed modification of Conditions of Certification AQ-41 and AQ-47 are addressed below. For the reasons detailed in section 2.0 above, neither of the proposed changes to the A2PP Air Quality Conditions of Certification will have a significant impact on air quality or any other significant environmental impact or effect on LORS.

3.1 Condition of Certification AQ-41

As discussed above, modifying Condition of Certification AQ-41 to expressly allow startup and shutdown emissions testing every seven years on one of the three turbines instead of all three will have no effect on emissions from the project. It will not affect TID’s obligation to operate the CEMS in compliance with the applicable requirements of 40 CFR Parts 60 and 75. It likewise will have no effect on the quality of data, or on monitoring, recordkeeping, and reporting requirements. TID will be required to continuously monitor and record emissions from each gas turbine, including during startup, using the continuous emissions monitoring systems (CEMS), and to maintain records of measurements.

The proposed change in Condition of Certification AQ-41 is solely related to clarifying the requirements for source testing to measure startup and shutdown emission NO_x, CO, and VOC mass emission rates, and thus will have no impact on biological resources, cultural resources, geology and paleontology, hazardous materials management, land use, noise and vibration,

public health, socioeconomics, soil and water resources, traffic and transportation, visual resources, waste management, or worker safety and fire protection.

The proposed modification of Condition of Certification AQ-41 is consistent with all applicable LORS. The change will only clarify that testing a single representative turbine will satisfy the requirement for periodic startup and shutdown emission testing, and will not otherwise alter any emissions limits or testing requirements. As noted above, TID has verified that the proposed modification is consistent with EPA precedent and practice. All findings and conclusions contained in the Commission Decision for the project will remain applicable to the project permit, as modified.

3.2 Condition of Certification AQ-47

As discussed above, TID has proposed removing the specification requiring that the fuel flow meters be “non-resettable” and “totalizing” in order to address potential inconsistencies with the metering requirements applicable under 40 CFR Part 60 and 75. This change will not alter applicable fuel measurement or monitoring requirements, and thus will not have a significant impact on air quality.

The proposed change in Condition of Certification AQ-47 will make a minor change in the specification for the type of fuel flow meter used to measure the amount of natural gas combusted in the unit, and thus will have no impact on biological resources, cultural resources, geology and paleontology, hazardous materials management, land use, noise and vibration, public health, socioeconomics, soil and water resources, traffic and transportation, visual resources, waste management, or worker safety and fire protection.

The proposed change in AQ-47 is consistent with all applicable LORS. Indeed, by approving this modification, the Commission will enable the project to avoid a potential inconsistency between the fuel flow metering technology required to comply with fuel metering requirements established under 40 CFR Part 60, and used by projects that are subject to the requirements in 40 CFR Part 75. All findings and conclusions contained in the Commission Decision for the project will remain applicable to the project permit, as modified.

4.0 Potential Effects on the Public

Consistent with Section 1769(a)(1)(G) of the Siting Regulations, this section discusses the proposed project modification effects on the public. The proposed minor modifications to Conditions of Certification AQ-41 and AQ-47 proposed in this Amendment will have no significant impacts on the environment, and will be in compliance with all applicable LORS and Conditions of Certification. Accordingly, there will be no adverse impacts on the public associated with this Amendment.

5.0 List of Property Owners and Potential Effects on Property Owners

Section 1769(a)(1)(H) of the Siting Regulations requires a list of the property owners potentially affected by the proposed modification. Insofar as the proposed minor modifications to

Conditions of Certification AQ-41 and 47 will have no significant impacts on the environment, and will be in compliance with all applicable LORS and Conditions of Certification, the Amendment will have no impact on any property owners. Nevertheless, a list of property owners is provided as Attachment B.

6.0 Proposed Changes to Conditions of Certification

AQ-41 Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted before the end of the commissioning period and at least once every seven years thereafter on one of the three turbines (N-3299-4-0, '-5-0 or '-6-0). CEM relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing on one of the three gas turbines shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the once every seven years schedule. [District Rule 1081]

Verification: The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a pre-approved protocol (**AQ-39**). Testing for startup and shutdown emissions shall be conducted upon initial operation and at least once every seven years.

AQ-47 A ~~non-resettable, totalizing~~ mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201 and 4703]

Verification: The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.

Attachment A

Copy of the SJVAPCD Application for Minor Modification



RECEIVED

DEC 20 2012

SJVAPCD
NORTHERN REGION

Board of Directors:
Joe Alamo
Charles Fernandes
Michael Frantz
Ron Macedo
Rob Santos

December 19, 2012

COPY

Rupi Gill
Permit Services Manager
San Joaquin Valley Air Pollution Control District
4800 Enterprise Way
Modesto, CA 95356-8718

Re: Application for Minor Modifications
Turlock Irrigation District, Almond 2 Power Plant
Permit Nos. N-3299-4-0, '5-0 and '6-0

Dear Mr. Gill:

Turlock Irrigation District is proposing two minor revisions to the conditions of the Authorities to Construct issued by the District in February 2010 for three identical simple-cycle LM6000 gas turbines at the Almond 2 Power Plant. The requested revisions would change the language of conditions #41 and #47 of each permit to better reflect what we believe to be the intent of these conditions regarding startup/shutdown relative accuracy testing and non-resettable fuel flow meters.

We believe the proposed revisions qualify as minor permit modifications under Rule 2520 for the following reasons:

- They do not violate requirements of any applicable federally enforceable local or federal regulation;
- They do not relax monitoring, reporting, or recordkeeping requirements and are not significant changes in existing monitoring permit terms or conditions;
- They do not seek to change any emissions limits or standards;
- They do not seek to establish or change a permit condition for which there is no corresponding underlying applicable requirement, and that we assumed to avoid an applicable requirement to which the facility would otherwise be subject;
- They are not modifications under Title I, under Section 111 or 112 of the CAA, or under PSD regulations; and
- They do not seek to consolidate any overlapping applicable requirements.

A more detailed discussion regarding each proposed revision is provided below.

Condition 41

Condition 41 in each permit requires startup and shutdown testing of the gas turbines every seven years. Based on discussions with District staff and a review of other permits for facilities with multiple identical gas turbines, we believe the intent of this condition was to require the testing of one representative gas turbine every seven years; however, a literal reading of the three permits would require testing of all three turbines. We are requesting that the District revise Condition 41 to allow testing of a single representative turbine. Suggested language is provided below.

Source testing to measure startup and shutdown NOx, CO, and VOC mass emission rates shall be conducted before the end of the commissioning period and at least once every seven years thereafter on one of the three turbines (N-3299-4-0, '-5-0 or '-6-0). CEM relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NOx and CO startup emission limits, then startup and shutdown NOx and CO testing on one of the three gas turbines shall be conducted every 12 months. If an annual startup and shutdown NOx and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NOx and CO testing frequency shall return to the once every seven years schedule.

Justification: The A2PP gas turbines are simple-cycle units that start up—that is, come into compliance with their routine emission limits—in less than 30 minutes. This very short startup period makes it difficult, if not impossible, to obtain meaningful source test results with one-hour test runs. In addition, because the gas turbines are identical, we believe that the startup and shutdown test results from one gas turbine can be used to verify compliance for all three units. Using emission test results from a single gas turbine to demonstrate compliance with NSPS limits for several identical turbines has been allowed by EPA in several instances (see, for example, test waiver approval letters from Region 4,^{1,2} Region 6,³ and Region 10⁴). We do not believe that additional meaningful data would be obtained by testing all three turbines during startup and shutdown.

This proposed change does not relax monitoring, recordkeeping, or reporting requirements as conditions requiring monitoring, recordkeeping, and reporting would be unaffected. TID would still be required to continuously monitor and record emissions from each gas turbine, including during startup, using the CEMS, and to maintain records of measurements. The requested change also does not affect TID's obligation to operate the CEMS in compliance with the applicable requirements of 40 CFR Parts 60 and 75.

¹ <http://cfpub.epa.gov/adi/pdf/adi-nsps-0600086.pdf>

² <http://cfpub.epa.gov/adi/pdf/adi-nsps-0500103.pdf>

³ <http://cfpub.epa.gov/adi/pdf/adi-nsps-9600019.pdf>

⁴ <http://cfpub.epa.gov/adi/pdf/adi-nsps-0300088.pdf>

Condition 47

Condition 47 requires the use of a “non-resettable, totalizing” fuel flow meter on each gas turbine to measure the amount of natural gas combusted. We are concerned that the requirement for a “non-resettable, totalizing” flow meter is not consistent with the fuel flow meter technology that must be used to comply with the fuel metering requirements under 40 CFR Part 75 and the continuous emissions monitoring requirements under 40 CFR Part 60. We request that the District revise Condition 47 in each permit to delete the requirement that the fuel flow meter be non-resettable and totalizing, as shown in the modified language below.

A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained.

Justification: Non-resettable totalizing fuel meters are commonly used on emergency engines and propane tanks, but fuel use in gas turbines is measured and totalized through the computerized data acquisition and handling system that processes and performs calculations using fuel flow meter data and other data collected by the CEMS. In the event of a power or computer system outage, the flow meters reset to zero because the fuel flow signal is lost; however, the fuel use data records are maintained in long-term storage so the records of the amount of fuel used are unaffected. The fuel meters and associated data acquisition and handling system provide a permanent, cumulative record of fuel use in each gas turbine, and so comply with the intent of the condition. However, the type of fuel metering systems used with gas turbine CEMS is not “non-resettable” and “totalizing” in the traditional sense. To avoid potential confusion, we request that the District modify the permit conditions as proposed.

The Acid Rain regulations in 40 CFR Part 75 (Section 2.1 of Appendix D) require the use of a certified fuel flow meter to continuously monitor the fuel flow rate. Section 2.1.5 requires initial certification that a fuel flow meter meets a flow meter accuracy of 2.0% of the upper range value across the range of fuel flow rate to be measured at the unit. Section 2.1.6 further requires quality assurance testing every four quality assurance operating quarters (i.e., annually for most units) to confirm that the fuel flow meter still meets the 2.0% accuracy threshold. The Acid rain regulations do not require the use of non-resettable or totalizing fuel meters.

This change does not relax any monitoring condition because it does not alter or eliminate the need to install, utilize, and maintain a fuel flow meter on each gas turbine, or to record and maintain records of fuel use in each gas turbine. The proposed change does not affect the Part 75 requirements to continuously monitor the fuel flow rate to each turbine using a calibrated fuel flow meter.

We appreciate your consideration of these requests. The required application forms are attached, along with a check for the Rule 3010 filing fees, as follows:

Authority to Construct fee, 3 units:	3 x \$71 =	\$213
Part 70 fee, 3 units:	3 x \$19 =	<u>\$ 57</u>
Total		\$270

If you have any questions regarding this request, please contact Charles Canales of my staff at (209) 883-3454 or Jeff Adkins of Sierra Research at (916) 273-5127.

Sincerely,



George Davies, IV
Combustion Turbine Department Manager

Attachments

cc: Jeff Adkins, Sierra Research
Susan Strachan

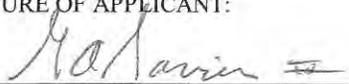
San Joaquin Valley Air Pollution Control District

www.valleyair.org

COPY

Permit Application For:

- AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit
- AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/Valid ATC
- AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct
- PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate

1. PERMIT TO BE ISSUED TO: Turlock Irrigation District	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>P. O. Box 949</u> CITY: <u>Turlock</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95381-0949</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>4500 Crows Landing Road</u> CITY: <u>Modesto</u> <u>NW</u> /4 SECTION <u>21</u> TOWNSHIP <u>4S</u> RANGE <u>9E</u>	
4. GENERAL NATURE OF BUSINESS: Electric power production	
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC (If yes, please complete and attach a Compliance Certification form (TVFORM-009)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Application for minor revisions to conditions #41 and #47 of the Authorities to Construct issued by the District in February 2010 for three identical simple-cycle LM6000 gas turbines at the Almond 2 Power Plant. Authorities to Construct: N-3299-4-0, N-3299-5-0, and N-3299-6-0.	
7. PERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? Please note that checking "YES" will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. <input type="checkbox"/> 3-day review <input type="checkbox"/> 10-day review <input checked="" type="checkbox"/> No review requested	
8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If yes, ATC/PTO #: <u>see #6 above</u>	Optional Section 11. DO YOU WANT TO RECEIVE INFORMATION ABOUT EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS? <input type="checkbox"/> "HEALTHY AIR LIVING (HAL) BUSINESS PARTNER"  <input type="checkbox"/> "INSPECT" 
9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? (If "Yes" is checked, please complete the CEQA Information form) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If yes, NOV/NTC #: _____	
12. TYPE OR PRINT NAME OF APPLICANT: <u>George Davies, IV</u>	TITLE OF APPLICANT: <u>Combustion Turbine Department Manager</u>
13. SIGNATURE OF APPLICANT: 	DATE: <u>12/19/12</u>
PHONE #: (209) 883-3451 FAX #: (209) 656-2188 E-MAIL: gadavies@tid.org	

FOR APCD USE ONLY:

DATE STAMP: RECEIVED <u>DEC 20 2012</u> OTC SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ _____ CHECK #: _____
DATE PAID: _____	PROJECT #: _____ FACILITY ID: _____

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

COPY

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>Turlock Irrigation District</u>		
2. MAILING ADDRESS:		
STREET/P.O. BOX: <u>PO Box 949</u>		
CITY: <u>Turlock</u>	STATE: <u>CA</u>	9-DIGIT ZIP CODE: <u>95381</u>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:		INSTALLATION DATE:
STREET: <u>4500 Crows Landing Road</u> CITY: <u>Modesto</u>		
<u>NW</u> ¼ SECTION <u>21</u> TOWNSHIP <u>4S</u> RANGE <u>9E</u>		
4. GENERAL NATURE OF BUSINESS: <u>Electric power production</u>		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)		
Application for minor revisions to conditions #41 and #47 of the Authorities to Construct issued by the District in February 2010 for three identical simple-cycle LM6000 gas turbines at the Almond 2 Power Plant. Authorities to Construct: N-3299-4-0, N-3299-5-0, and N-3299-6-0.		
6. TYPE OR PRINT NAME OF APPLICANT:		TITLE OF APPLICANT:
<u>George Davies, IV</u>		<u>Combustion Turbine Department Manager</u>
7. SIGNATURE OF APPLICANT:	DATE:	PHONE: (209) 883-3451
	<u>12/19/12</u>	FAX: (209) 656-2188
		EMAIL: <u>gadavies@tid.org</u>

For APCD Use Only:

<p>DATE STAMP</p> <p style="font-size: 2em; text-align: center;">RECEIVED</p> <p style="text-align: center; font-size: 1.5em;">DEC 20 2012 <i>OTC</i></p> <p style="text-align: center;">SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: \$ _____ CHECK#: _____</p> <p>DATE PAID: _____</p> <p>PROJECT NO: _____ FACILITY ID: _____</p>
---	--

San Joaquin Valley Air Pollution Control District Supplemental Application Form

Gas Turbines

Please complete one form for each gas turbine.

This form must be accompanied by a completed Application for Authority to Construct and Permit to Operate form

PERMIT TO BE ISSUED TO: Turlock Irrigation District

EQUIPMENT DESCRIPTION

Equipment Details	<input type="checkbox"/> Industrial Frame <input checked="" type="checkbox"/> Aero Derivative <input type="checkbox"/> Other: _____		
	Manufacturer: General Electric	Model: LM6000 PG	Serial Number:
	<input checked="" type="checkbox"/> Simple Cycle <input type="checkbox"/> Combined Cycle <input type="checkbox"/> Co-generation <input type="checkbox"/> Other: _____		
	Nominal (ISO) Rating: <u>54.2</u> MW (at 1 atm, 59°F, 60% Relative Humidity)		
Rule 4703 Type of Use and Emissions Monitoring Provisions	<input type="checkbox"/> Peaking Unit - limited to no more than 877 hrs/yr of operation <input type="checkbox"/> Emergency Standby - limited to less than 200 hrs/yr of operation <input checked="" type="checkbox"/> Full Time - must have either a Continuous Emission Monitoring System (CEMS) or an alternate emissions monitoring plan (must be approved by the APCO) <input checked="" type="checkbox"/> CEMS, please specify all pollutants monitored: <input checked="" type="checkbox"/> NO _x <input checked="" type="checkbox"/> CO <input checked="" type="checkbox"/> O ₂ <input type="checkbox"/> Other: _____ <input type="checkbox"/> Alternate Emissions Monitoring Plan (please provide details in additional documentation)		
	<input checked="" type="checkbox"/> Gaseous Fuel Meter <input type="checkbox"/> Liquid Fuel Meter <input type="checkbox"/> None		
Fuel Use Meter	<input checked="" type="checkbox"/> Gaseous Fuel Meter <input type="checkbox"/> Liquid Fuel Meter <input type="checkbox"/> None		
Process Data	Will this unit be used in an electric utility rate reduction program? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Combustor(s)	Manufacturer: GE	Model:	Number of Combustors: 1
	Maximum Heat Input Rating (for all combustors @ ISO standard conditions): <u>523</u> MM Btu/hr		
	Water Injection: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dry Low NO _x Technology: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
	Steam Injection: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Other NO _x Control Technology: <u>N/A</u>	

EMISSIONS DATA

Note: See District BACT and District Rule 4703 requirements for applicability to proposed unit at <http://www.valleyair.org/busind/pto/bact/chapter3.pdf> and <http://www.valleyair.org/rules/currentrules/r4703.pdf>

Primary Fuel	Fuel Type: <input checked="" type="checkbox"/> Natural Gas <input type="checkbox"/> LPG/Propane <input type="checkbox"/> Diesel <input type="checkbox"/> Other: _____						
	Higher Heating Value: _____ Btu/gal or 1021 Btu/scf			Sulfur Content: _____ % by weight or <u>1</u> gr/scf			
	Maximum Fuel Use @ HHV: <u>9095</u> scf/hr or _____ gal/hr			Rated Efficiency (EFF _{Mfg}): <u>tbd</u> %			
Primary Fuel Emissions Data	Operational Mode	Steady State		Start-up		Shutdown	
		(ppmv)	(lb/MMBtu)	(ppmv)	(lb/hr)	(ppmv)	(lb/hr)
	Nitrogen Oxides	2.5	0.0091		25		25
	Carbon Monoxide	4.0	0.0088		40		40
	Volatile Organic Compounds	2.0	0.0025		2		2
Duration				<u>2</u> hr/day	<u>730</u> hr/yr	<u>0.5</u> hr/day	<u>182.5</u> hr/yr
% O ₂ , dry basis, if corrected to other than 15%: <u>N/A</u> %							

EMISSIONS DATA (continued)

Secondary Fuel	When will the secondary fuel be used? <input type="checkbox"/> Primary fuel curtailment <input type="checkbox"/> Simultaneously with primary fuel <input type="checkbox"/> Other: _____							
	Fuel Type: <input type="checkbox"/> Natural Gas <input type="checkbox"/> LPG/Propane <input type="checkbox"/> Diesel <input type="checkbox"/> Other: _____							
	Higher Heating Value: _____ Btu/gal or _____ Btu/scf			Sulfur Content: _____ % by weight or _____ gr/scf				
	Maximum Fuel Use @ HHV: _____ scf/hr or _____ gal/hr			Rated Efficiency (EFF _{Mfg}): _____ %				
Secondary Fuel Emissions Data	Operational Mode	Steady State (ppmv) (lb/MMBtu)		Start-up (ppmv) (lb/hr)		Shutdown (ppmv) (lb/hr)		
	Nitrogen Oxides							
	Carbon Monoxide							
	Volatile Organic Compounds							
	Duration (please provide justification)				_____ hr/day	_____ hr/yr	_____ hr/day	_____ hr/yr
	% O ₂ , dry basis, if corrected to other than 15%: _____ %							
Source of Data	<input checked="" type="checkbox"/> Manufacturer's Specifications <input type="checkbox"/> Emission Source Test <input type="checkbox"/> Other _____ (please provide copies)							

EMISSIONS CONTROL

Emissions Control Equipment <small>(Check all that apply)</small>	<input checked="" type="checkbox"/> Inlet Air Filter/Cooler		<input checked="" type="checkbox"/> Lube Oil Vent Coalescer			
	<input checked="" type="checkbox"/> Selective Catalytic Reduction - Manufacturer: <u>Cormetech</u> Model: <u>CMHT-21</u> <input checked="" type="checkbox"/> Ammonia (NH ₃) <input type="checkbox"/> Urea <input type="checkbox"/> Other: _____					
	<input checked="" type="checkbox"/> Oxidation Catalyst - Manufacturer: <u>BASF</u> Model: <u>CAMET Oxidation Catalyst</u>					
	Control Efficiencies: NO _x <u>90</u> %, SO _x <u>n/a</u> %, PM ₁₀ <u>n/a</u> %, CO <u>>90</u> %, VOC <u>n/a</u> %					
	<input type="checkbox"/> Other (please specify): _____					
	For units equipped with exhaust gas NO _x control equipment and rated < 10 MW, or rated ≥ 10 MW but operated < 4,000 hr/yr, one may choose at least one of the following alternate emission monitoring schemes in lieu of a CEMS (each option below must be approved by APCO on a case-by-case basis. Please include a detailed proposal for each option chosen): <input type="checkbox"/> Periodic NO _x emission concentration <input type="checkbox"/> Turbine exhaust O ₂ concentration <input type="checkbox"/> Air-to-Fuel ratio <input type="checkbox"/> Flow rate of reducing agents added to turbine exhaust <input type="checkbox"/> Catalyst inlet and outlet temperature <input type="checkbox"/> Catalyst inlet and exhaust O ₂ conc. <input type="checkbox"/> Other operational characteristics as approved by the APCO (specify on attached sheet)					

HEALTH RISK ASSESSMENT DATA

Operating Hours	Maximum Operating Schedule: _____ hours per day, and _____ hours per year					
Receptor Data	Distance to nearest Residence	<u>1750</u> feet	Distance is measured from the proposed stack location to the nearest boundary of the nearest apartment, house, dormitory, etc.			
	Direction to nearest Residence	<u>NNE</u>	Direction from the stack to the receptor, i.e. Northeast or South.			
	Distance to nearest Business	<u>~600</u> feet	Distance is measured from the proposed stack location to the nearest boundary of the nearest office building, factory, store, etc.			
	Direction to nearest Business	<u>W</u>	Direction from the stack to the receptor, i.e. North or Southwest.			
Stack Parameters	Release Height	<u>80</u> feet above grade				
	Stack Diameter	<u>144</u> inches at point of release				
	Rain Cap	<input type="checkbox"/> Flapper-type <input type="checkbox"/> Fixed-type <input checked="" type="checkbox"/> None <input type="checkbox"/> Other: _____				
	Direction of Flow	<input checked="" type="checkbox"/> Vertically Upward <input type="checkbox"/> Horizontal <input type="checkbox"/> Other: _____ ° from vert. or _____ ° from horiz.				
Exhaust Data	Flowrate: <u>661,894</u> acfm			Temperature: <u>850</u> °F		
Facility Location	<input type="checkbox"/> Urban (area of dense population) <input checked="" type="checkbox"/> Rural (area of sparse population)					

FOR DISTRICT USE ONLY

Date:	FID:	Project:	Public Notice: [] Yes [] No
Comments:			

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

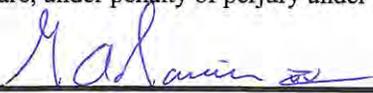
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Turlock Irrigation District	FACILITY ID: N 3299
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Utility	
2. Owner's Name: Turlock Irrigation District	
3. Agent to the Owner: George Davies, IV	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

George Davies, IV

Name of Responsible Official (please print)

Combustion Turbine Department Manager

Title of Responsible Official (please print)

12/19/12
Date



WATER & POWER

Serving Central California since 1887
333 EAST CANAL DRIVE
POST OFFICE BOX 949
TURLOCK, CALIFORNIA 95381-0949
(209) 883-8300

CHECK NUMBER

28174

11-35
1210

DATE
12/20/2012

CHECK AMOUNT
\$270.00

TURLOCK BRANCH

BANK OF AMERICA

National Trust & Savings Association

TURLOCK IRRIG. DIST. 27000LS00CTS

PAY EXACTLY

PAY TO
ORDER
OF

San Joaquin Valley Air Pollution
Control District

BY 
TURLOCK IRRIGATION DISTRICT

⑈028174⑈ ⑆121000358⑆ 08320⑈80152⑈

DETACH BEFORE CASHING • KEEP FOR YOUR RECORDS



WATER & POWER

Serving Central California since 1887
333 EAST CANAL DRIVE
POST OFFICE BOX 949
TURLOCK, CALIFORNIA 95381-0949
(209) 883-8300

CHECK NUMBER

28174

REVOLVING ACCOUNT

DATE
12/20/2012

INVOICE DATE	REFERENCE	P. O. NUMBER	GROSS AMOUNT	DISCOUNT AMOUNT	ADJUSTMENT	NET AMOUNT
	Application for minor modification of Almond 2 Power Plant permits N-3299-4-0, -5-0, and -6-0					\$270.00
	53310 751 064					

SAN JOAQUIN VALLEY
UNIFIED APCD
4800 Enterprise Way
Modesto, CA 95356-9322

**CASH
RECEIPT**

Date 12/20 2012

308355

Received From TIP
Address 333 East Canal Dr, Turlock

For ATC filing fee Dollars \$ 270.00
OK #28174

ACCOUNT		HOW PAID	
AMT. OF ACCOUNT		CASH	
AMT. PAID	<u>270.00</u>	CHECK	<input checked="" type="checkbox"/>
BALANCE DUE		MONEY ORDER	

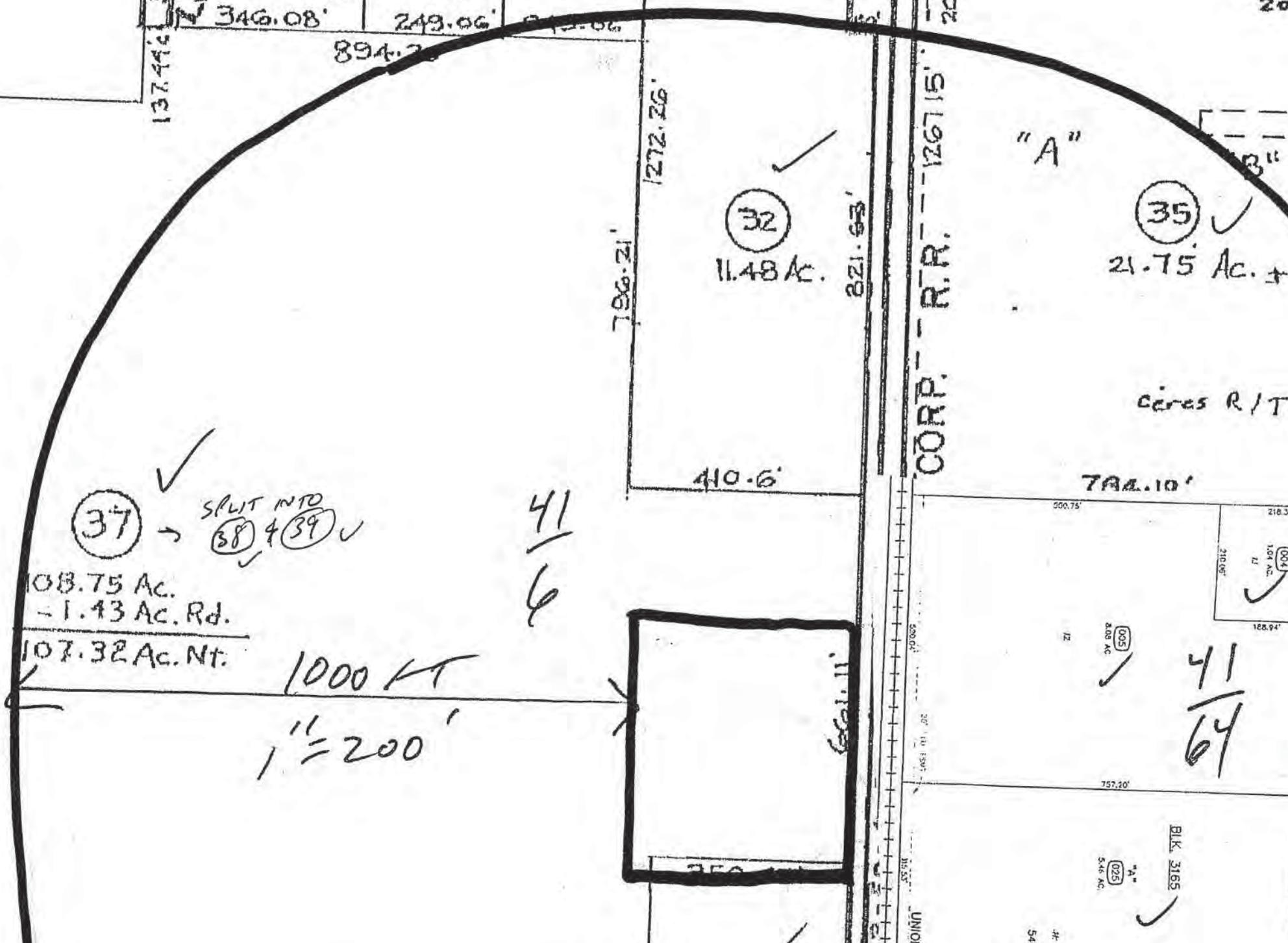
By Kim Crews

Attachment B

Property Owners Located within 1,000 feet of the Power Plant Site

PARCEL	OWNERFIRST	OWNERLAST	MAILNUMBER	MAILSTREET	MAILCITY	MAILSTATE	MAILZIP	SITENUMBER	SITESTREET	SITECITY	SITESTATE	SITEZIP
1	041 006 026 000	Turlock Irrigation District		Po Box 949	Turlock	CA	95381		Crows Landing Rd	Ceres	CA	95307
2	041 006 029 000	Clarkson California Properties	480	E Service Rd	Modesto	CA	95358	480	E Service Rd	Modesto	CA	95358
3	041 006 030 000	Manuel & Dora I	1043	San Pedro Ave	Ceres	CA	95307	520	Service Rd	Ceres	CA	95307
4	041 006 032 000	Stanislaus Farm Supply Co	624	E Service Rd	Modesto	CA	95358	624	E Service Rd	Modesto	CA	95358
5	041 006 035 000	Stanislaus Farm Supply Co Inc	624	E Service Rd	Modesto	CA	95358	712	E Service Rd	Modesto	CA	95351
6	041 006 038 000	Winco Foods Lic		PO Box 35547	Tulsa	OK	74153	4400	Crows Landing Rd	Ceres	CA	95307
7	041 006 039 000	Turlock Irrigation District		PO Box 949	Turlock	CA	95381		Crows Landing Rd	Ceres	CA	95307
8	041 007 005 000	Emma F	6125	Crows Landing Rd	Ceres	CA	95307		Grayson & Tsrr	Ceres	CA	00000
9	041 007 007 000	Dairy	943	E Grayson Rd	Ceres	CA	95307	943	E Grayson Rd	Ceres	CA	95307
10	041 063 027 000	Paul Dhoung	239	Money Ct	San Jose	CA	95111	991	Partee Ln	Ceres	CA	95307
11	041 063 035 000	Miller Investments LP	909	Foxcroft Ln	Modesto	CA	95355	4220	Farm Supply Dr	Ceres	CA	95307
12	041 064 002 000	Don	1015	Montclair Dr	Ceres	CA	95307	1015	Montclair Dr	Ceres	CA	95307
13	041 064 003 000	Benito	11459	W Belmont Ave	Fresno	CA	93723	991	Montclair Dr	Ceres	CA	95307
14	041 064 004 000	Morgan Road Industrial Park LP	502	Fleetwood Dr	Modesto	CA	95350	4325	Farm Supply Dr	Ceres	CA	95307
15	041 064 005 000	Hsm Pacific LLC	3228	Long Lake Dr SE	Olympia	WA	98503	4375	Farm Supply Dr	Ceres	CA	95307
16	041 064 008 000	Fred & Leanne	5172	Kiernan Ct #d	Salida	CA	95368	992	Marchy Ln	Ceres	CA	95307
17	041 064 012 000	Arthur R & Mavis E	1220	Cone Flower Ct	Modesto	CA	95355	1015	Marchy Ln	Ceres	CA	95307
18	041 064 013 000	Arthur R & Mavis E	1220	Cone Flower Ct	Modesto	CA	95355	4476	Farm Supply Dr	Ceres	CA	95307
19	041 064 014 000	Paul	4112	Fern Grove Ct	Modesto	CA	95356	4456	Farm Supply Dr	Ceres	CA	95307
20	041 064 015 000	B & D United Builders Inc	501	Bitritto Way	Modesto	CA	95356	1016	Premier Dr	Ceres	CA	95307
21	041 064 018 000	B & D United Builders Inc	501	Bitritto Way	Modesto	CA	95356	1015	Premier Dr	Ceres	CA	95307
22	041 064 019 000	B & D United Builders Inc	501	Bitritto Way	Modesto	CA	95356	991	Premier Dr	Ceres	CA	95307
23	041 064 020 000	William G	3740	N Golden State Blvd	Turlock	CA	95382	4396	Farm Supply Dr	Ceres	CA	95307
24	041 064 021 000	Daniel & Karen	16911	Schell Rd	Oakdale	CA	95361	4376	Farm Supply Dr	Ceres	CA	95307
25	041 064 022 000	Precision Investment Group LLC	5039	Pentecost Dr	Modesto	CA	95356	4475	Farm Supply Dr	Ceres	CA	95307
26	041 064 023 000	Precision Investment Group LLC	5039	Pentecost Dr	Modesto	CA	95356		Farm Supply Dr	Ceres	CA	95307
27	041 064 024 000	Mid Valley Development (Cal) LLC	7457	River Nine Dr	Modesto	CA	95356	4425	Farm Supply Dr	Ceres	CA	95307
28	041 064 025 000	Hsm Pacific LLC	3228	Long Lake Dr SE	Olympia	WA	98503		Farm Supply Dr	Ceres	CA	95307

340
 50' BOY
 110' PULZE
 28
 3.74 Ac
 346.08'
 471.0
 29
 2.69 Ac.
 249.06'
 471.0
 30
 2.69 Ac.
 471.0
 R.S. 12-56
 450
 20' TID ECG
 24-PM-75
 1-
 A
 20



37 ✓ → SPLIT INTO
 38 + 39 ✓

108.75 Ac.
 - 1.43 Ac. Rd.
 107.32 Ac. Nt.

1000 FT
 1" = 200'

41
 6

41
 64

CORP. R.R. 126715

"A"

35 ✓
 21.75 Ac. +

Ceres R/T

784.10'

005
200 AC

025
54 AC

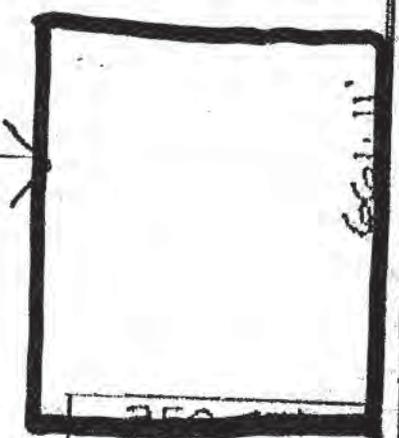
BLK. 3165

UNION

1.43 Ac. Rd.

107.32 Ac. Nt.

1000 FT
1" = 200'



661.11'

76
5.0 Ac. ±

621.11'

350.67'

1824.33'

T.I.D.

1 AT

T.I.D. ESMT.

1285'

41/7

5

76.15 AC

R. R.

7

133 AC

41/64

005
8.00 AC

025
5.46 AC

024
4.00 AC

022
5.22 AC

UNION PACIFIC R. R.

BLK. 3165

54-P-185

702

3165
JOHN'S PRIVATE
UNITY ESMT.

128.94'

757.20'

749.89'

744.65'

520.00'

315.33'

243.23'

220.80'

023
306.5'

5.11'

78.72'

78.74'

5.00'

5.00'

5.11'

5.11'

340.67'

15' P.U.L.

3165'

233.23'

233.23'

233.23'

233.23'

233.23'

233.23'

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233.23'

233.23'

233.23'

233.23'

233.23'

233.23'

233.23'

233.23'

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



DATE: February 3, 2014

TO: Interested Parties

FROM: Bruce Boyer, Compliance Project Manager

**SUBJECT: Almond 2 Power Plant (09-AFC-2C)
Staff Analysis of Proposed Modifications to Air Quality Conditions of Certification**

On February 22, 2013, Turlock Irrigation District (TID) filed a petition with the California Energy Commission (Energy Commission) to amend the December 15, 2010 Energy Commission Final Decision for the Almond 2 Power Plant (A2PP). On June 17, 2013, TID requested that additional modifications be added to the February 22, 2013, petition.

The A2PP is a 174-megawatt (MW) simple-cycle peaking power plant, located in the City of Ceres, in Stanislaus County. The project was certified by the Energy Commission on December 15, 2010, and began commercial operation on July 13, 2012.

The proposed modifications to Air Quality Conditions of Certification would allow A2PP: (1) to delete the requirement that the fuel flow meter be non-resettable and totalizing; (2) to allow the testing of compliance with startup and shutdown emission limits to a single representative turbine; (3) and to modify or delete conditions that regulate certain activities with reference to construction and commissioning periods.

Energy Commission staff reviewed the petition and assessed the impacts of the proposed changes on environmental quality and on public health and safety. Staff recommends modifications to existing Air Quality Conditions of Certification **AQ-1, 11, 12, 13, 14, 15, 16, 19, 20, 41, 42, 47, 65, 66, 67, 68, 69, 70, and 71**. It is staff's opinion that, with the implementation of the modified conditions, the A2PP would remain in compliance with applicable laws, ordinances, regulations, and standards and that the proposed modifications would not result in significant adverse direct or cumulative impacts to the environment (Cal. Code Regs., tit. 20, § 1769).

The amendment petition and staff's analysis have been posted on the Energy Commission's A2PP webpage at <http://www.energy.ca.gov/sitingcases/almond/>. The Energy Commission's Order regarding this petition will also be posted on the webpage. Energy Commission staff intends to recommend approval of the petition at the March 12, 2014, Business Meeting of the Energy Commission.

Agencies and members of the public who wish to provide comments on the Staff Analysis are asked to submit their comments prior to March 3, 2014, using the Energy Commission's e-commenting feature, by going to the Energy Commission's A2PP webpage <http://www.energy.ca.gov/sitingcases/almond/> and clicking on the "Submit e-

Comment” link. A full name, e-mail address, comment title, and either a comment or an attached document (in the .doc, .docx, or .pdf format), are mandatory. After entering CAPTCHA (a challenge-response test used to ensure that responses are generated by a human user and not a computer), click on the “Agree & Submit Your Comment” button to submit the comment to the Energy Commission Dockets Unit. Written comments may also be mailed or hand delivered to:

California Energy Commission
Dockets Unit, MS-4
Docket No. 09-AFC-2C
1516 Ninth Street
Sacramento, CA 95814-5512

All comments and materials filed with the Dockets Unit will become part of the public record of the proceeding.

If you have any questions, please contact Bruce Boyer, Compliance Project Manager, at (916) 653-7181, or by fax to (916) 654-3882, or via e-mail at: bboyer@energy.ca.gov

If you desire information on participating in the Energy Commission's review of the project, please contact the Energy Commission's Public Adviser at (916) 654-4489, or at (800) 822-6228 (toll free in California). The Public Adviser's Office can also be contacted via email at publicadviser@energy.ca.gov.

News media inquiries should be directed to the Energy Commission Media Office at (916) 654-4989, or by e-mail at mediaoffice@energy.ca.gov.

Mail List # **7352**

ALMOND 2 POWER PLANT (09-AFC-2C)
Petition to Amend Commission Decision
Executive Summary
Bruce Boyer

INTRODUCTION

On February 22, 2013, Turlock Irrigation District (TID) filed a petition with the California Energy Commission (Energy Commission) requesting to modify the Final Decision (Decision), for the Almond 2 Power Plant (A2PP). On June 17, 2013, TID requested that additional modifications be added to the February 22, 2013, petition. Staff has completed its review of all materials received.

The purpose of the Energy Commission's review process is to assess any impacts the proposed modifications would have on environmental quality and on public health and safety. The process includes an evaluation of the consistency of the proposed changes with the Energy Commission's Decision and an assessment of whether the project, as modified, would remain in compliance with applicable laws, ordinances, regulations, and standards (LORS) (Cal. Code Regs., tit. 20, § 1769).

This Staff Analysis contains the Energy Commission staff's evaluation for the technical area of Air Quality.

PROJECT LOCATION AND DESCRIPTION

The A2PP is a nominal 174-megawatt (MW) simple-cycle facility, certified by the Energy Commission on December 15, 2010. It began commercial operation on July 13, 2012.

The A2PP is located in the City of Ceres, in Stanislaus County.

DESCRIPTION OF, AND NECESSITY FOR, THE PROPOSED MODIFICATIONS

Proposed modifications to Air Quality Conditions of Certification **AQ-1, 11, 12, 13, 14, 15, 16, 19, 20, 41, 42, 47, 65, 66, 67, 68, 69, 70, and 71** would:

- Allow the testing of a single turbine to demonstrate compliance with startup and shutdown emission limits;
- Clarify the descriptive language regarding fuel flow meter requirements;
- Delete all irrelevant conditions pertaining to construction and commissioning; and
- Make certain clarifications and administrative amendments.

STAFF'S ASSESSMENT OF THE PROPOSED PROJECT CHANGES

Energy Commission technical staff reviewed the petition to amend for potential environmental effects and consistency with applicable LORS. Staff has determined that the technical or environmental areas of Biological Resources, Cultural Resources, Hazardous Materials Management, Facility Design, Land Use, Noise and Vibration, Paleontological Resources, Soil and Water Resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Transmission System Engineering, Visual Resources, Waste Management, and Worker Safety and Fire Protection would not be affected by the proposed changes, and no revisions or new conditions of certification are needed to ensure the project would remain in compliance with all applicable LORS. Staff's conclusions reached in each technical area are summarized in **Executive Summary Table 1**, below.

Staff determined that the technical area of Air Quality would be affected by the proposed changes and that revisions to some Air Quality Conditions of Certification would be needed to ensure the project would remain in compliance with all applicable LORS. The Air Quality analysis that follows this Executive Summary provides the details of the recommended staff revisions to the existing A2PP Decision and conditions of certification. Air Quality staff believes that by making the recommended changes to the existing Air Quality Conditions of Certification, the potential impacts of the project owner's proposed changes would be reduced to less than significant levels.

Staff has determined that Air Quality Conditions of Certification:

- **AQ-1** should be modified to reflect current San Joaquin Valley Air Pollution Control District (SJVAPCD) procedural requirements;
- **AQ-11** through **AQ-16**, and **AQ-65** through **AQ-71**, are no longer relevant and staff recommends deleting them;
- **AQ-19** and **AQ-20** should be modified to update the requirements to reflect the transition from construction to commissioning and operation;
- **AQ-41** should be modified to allow testing of a single turbine to demonstrate compliance with startup and shutdown emission limits and to remove references to the commissioning period;
- **AQ-42** should be modified to delete references to the commissioning period; and
- **AQ-47** descriptive language regarding the fuel flow meter should be changed.

**Executive Summary Table 1
Summary of Impacts to Each Technical Area**

TECHNICAL AREAS REVIEWED	STAFF RESPONSE			Revised Conditions of Certification Recommended
	Technical Area Not Affected	No Significant Environmental Impact*	Process As Amendment	
Air Quality			X	X
Biological Resources	X			
Cultural Resources	X			
Hazardous Materials Management	X			
Facility Design	X			
Land Use	X			
Noise and Vibration	X			
Paleontological Resources	X			
Soil and Water Resources	X			
Traffic and Transportation	X			
Transmission Line Safety & Nuisance	X			
Transmission System Engineering	X			
Visual Resources	X			
Waste Management	X			
Worker Safety and Fire Protection	X			

*There is no possibility that the proposed modifications would have a significant effect on the environment, and the modifications would not result in a change in or deletion of a condition adopted by the Commission in the Final Decision, or make changes that would cause project noncompliance with any applicable laws, ordinances, regulations, or standards (20 Cal. Code Regs., § 1769 (a)(2)).

STAFF RECOMMENDATIONS AND CONCLUSIONS

Staff concludes that the following required findings, mandated by Title 20, section 1769 (a)(3) of the California Code of Regulations, can be made, and staff recommends approval of the petition by the Energy Commission:

- A. The modifications would not change the findings in the Energy Commission’s Final Decision pursuant to Title 20, California Code of Regulations, section 1755;
- B. There would be no new or additional, unmitigated significant environmental impacts associated with the proposed changes;
- C. The facility would remain in compliance with all applicable laws, ordinances, regulations, and standards;
- D. The changes would be beneficial to the project owner because conditions that are no longer relevant would be deleted or modified and startup and shutdown testing and fuel flow meter requirements would be clear.

ALMOND II POWER PLANT (09-AFC-2C)
Petition to Amend Commission Decision
Air Quality Analysis
Nancy Fletcher

INTRODUCTION

On February 22, 2013, Turlock Irrigation District (TID) filed a petition (TID 2013a) with the California Energy Commission (Energy Commission) requesting minor amendments to the Air Quality Conditions of Certification for the Almond II Power Plant (A2PP). The facility is a 174-megawatt (MW) natural gas-fired, simple-cycle, peaking generating facility located on a 4.6-acre parcel zoned for industrial use, 2 miles from the center of the City of Ceres and 5 miles south of Modesto in Stanislaus County. The facility consists of three 58-MW General Electric Energy LM6000PG turbines equipped with water injection and selective catalytic reduction (SCR) for nitrogen oxide (NO_x) control. The facility operates as a peaking plant utilizing aeroderivative turbines designed for quick startups. The Energy Commission Decision approving the A2PP was issued on December 15, 2010.

TID is requesting revisions to the Air Quality Conditions of Certification to clarify and amend specific testing and monitoring requirements for the three turbines. Condition of Certification **AQ-41** requires source testing of each turbine to measure startup and shutdown mass emission rates and a Relative Accuracy Audit (RAA) for the continuous emission monitoring system (CEMS). The testing is required upon initial operation and at least once every seven years thereafter. TID is requesting to amend the language of **AQ-41** to allow the required startup testing of a single turbine to satisfy this requirement. In addition, Condition of Certification **AQ-47** requires the use of a non-resettable, totalizing fuel flow meter. TID is requesting to amend the language of **AQ-47** to remove the description, “non-resettable, totalizing,” and replace it with, “meets the requirements of 40 Part 75” which requires each turbine to operate with CEMS.

TID submitted a request to the San Joaquin Valley Air Pollution Control District (SJVAPCD) on December 19, 2012, to incorporate these changes into the SJVAPCD conditions for A2PP. The SJVAPCD evaluated the proposed changes, and the proposal underwent a 30-day public comment period and 45-day Environmental Protection Agency (EPA) comment period, beginning in early April, 2013. The SJVAPCD received no comments regarding the proposed changes and issued an Authority to Construct (ATC) for each turbine along with a Certificate of Conformity in accordance with 40 CFR Part 70. Subsequently, TID submitted an application to the SJVAPCD to modify the facility’s federal Title V operating permit to incorporate these changes. On June 25, 2013, the SJVAPCD sent notice to TID that the changes were incorporated into the A2PP’s Title V operating permit. In addition to TID’s requested amendments, SJVAPCD made additional changes to the conditions in the three turbine ATCs and Title V Operating Permit for the facility. Specifically, SJVAPCD deleted or modified conditions that pertained to construction and/or commissioning. On June 17, 2013, TID requested these additional condition modifications from SJVAPCD be incorporated into the Energy Commission’s Conditions of Certification and Decision.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS COMPLIANCE

The SJVAPCD reviewed the requested modifications and determined the changes would comply with their regulations. The facility owner submitted the engineering evaluation of the proposed changes to Energy Commission staff for review. The SJVAPCD analysis identified the air quality laws, ordinances, regulations and standards (LORS), included in **Air Quality Table 1** below, as applicable to the proposed amendment and all were addressed in the original Energy Commission Decision. There are no new applicable LORS.

Air Quality Table 1
San Joaquin Valley Air Pollution Control District
Laws, Ordinances, Regulations, and Standards (LORS)

Applicable Law	Description
Regulation I, General Provisions	Establishes the requirements and standards for stack monitoring (Rule 1080), source sampling (Rule 1081), and breakdown events (Rule 1100); identifies penalties for violations.
Regulation II, Permits	Establishes the regulatory framework for permitting new and modified sources. Included in these requirements are the federally delegated requirements for new source review (NSR), the Title V Operating Permit Program, and the Title IV Acid Rain Program.
Rule 2010, Permits Required	Requires any person constructing, altering, replacing, or operating any source operation which emits, may emit, or may reduce emissions to obtain an Authority to Construct and a Permit to Operate, unless exempted by Rule 2020.
Rule 2201, New and Modified Stationary Sources	Establishes the pre-construction review requirements for new, modified, or relocated emission sources, in conformance with NSR to ensure that these facilities do not interfere with progress in attainment of ambient air quality standards and that future economic growth in the San Joaquin Valley is not unnecessarily restricted. This regulation establishes Best Available Control Technology (BACT) and emission offset requirements. The proposed modification does not include any new emissions unit or relocation of equipment, would not result in an adjusted increase in the permitted emissions exceeding 2.0 pounds in any one day, and would not be considered a SB 288 Major Modification or Federal Major Modification (as defined in 40 CFR 51.165). Therefore BACT is not triggered. The proposed modifications would not result in any emission increase; therefore additional offsets would not be required.
Rule 2410, Prevention of Significant Deterioration	Incorporates federal Prevention of Significant Deterioration (PSD) program requirements for major sources in areas that are in attainment or unclassified for a federal criteria pollutant. The requested modifications would not result in any emission increase; therefore the A2PP would not result in an exceedance of any of the PSD thresholds and PSD does not apply.
Rule 2520, Federally Mandated Operating Permits	Establishes the permit application and compliance requirements for the federal Title V permit program. The proposed modifications triggered a 30-day public notice with EPA. The SJVAPCD submitted the Authorities to Construct (ATCs) to EPA for review. The ATCs were issued with Certificates of Conformity after EPA review in the Title V permit for the facility. TID received the amended Title V Operating Permit on June 27, 2013.

Applicable Law	Description
Rule 2540, Acid Rain Program	Implements the federal Title IV Acid Rain Program that requires subject facilities to obtain emission allowances for SO _x emissions and requires fuel sampling and/or continuous monitoring to determine SO _x and NO _x emissions.
Rule 2550, Federally Mandated Pre construction Review for Major Sources of Air Toxics	Establishes requirements for a new or reconstructed facility to be classified as a major air toxics source.
Rule 4001, New Source Performance Standards	Specifies that a project must meet the requirements of the Federal New Source Performance Standards (NSPS), according to Title 40, Code of Federal Regulations, Part 60. The specific NSPS subparts that are applicable include: <ul style="list-style-type: none"> • Subpart GG—Standards of Performance for Stationary Gas Turbines • Subpart KKKK—Standards of Performance for Stationary Combustion Turbines
Rule 4002, National Emission Standards for Hazardous Air Pollutants	Incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from, Chapter I, Subpart C, Title 40 CFR Parts 61 and 63 and applies them to sources of HAPs.
Rule 4101, Visible Emissions	Prohibits visible air emissions, other than water vapor, of more than No. 1 on the Ringelmann chart or 20 percent opacity for more than three minutes in any one hour.
Rule 4102, Nuisance	Prohibits any emissions which cause injury, detriment, or public nuisance.
Rule 4201-4202, Particulate Matter Concentration/Emission Rate	Limits particulate emissions from any source that emits or may emit dust, fumes, or total suspended particulate matter.
Rule 4301, Fuel Burning Equipment	Limits the concentrations of combustion contaminants and specified emission rates from any fuel burning equipment.
Rule 4703, Stationary Gas Turbines	Limits the proposed stationary gas turbine emissions of NO _x to 3 ppmv and carbon monoxide (CO) to 25 ppmv over a 3-hour averaging period. Provided certain demonstrations are made, the emission limits do not apply during startup, shutdown, or reduced load periods (defined as “transitional operation periods”).
Rule 4801, Sulfur Compounds	Limits oxides of sulfur (SO _x) emissions to no greater than 0.2 percent by volume calculated as sulfur dioxide (SO ₂) on a dry basis averaged over 15 consecutive minutes.
Regulation VIII, Fugitive PM10 Prohibition	Sets forth the requirements and performance standards for the control of fugitive PM10 emissions from various sources.

SETTING

The A2PP is located in the City of Ceres, in Stanislaus County, within the San Joaquin Valley Air Basin. The SJVAPCD has jurisdiction over seven full counties and one partial county that are within the San Joaquin Valley Air Basin in California’s Central Valley. The existing land uses surrounding the A2PP site are primarily industrial, agricultural, and rural residential. For convenience, staff includes **Air Quality Table 2**, which summarizes the area’s current attainment status for state and federal air quality standards for the SJVAPCD. The area is classified as non-attainment for ozone (state and federal), particulate matter less than 10 microns in diameter (PM10) (federal) and particulate matter less than 2.5 microns in diameter (PM2.5) (state and federal).

Air Quality Table 2
Current Federal and State Attainment Status, San Joaquin Valley Air Basin

Pollutant	State Classification	Federal Classification
Ozone (O ₃) (1-hour and 8-hour) ^a	Non-attainment	Non-attainment
Carbon Monoxide (CO)	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide (NO ₂)	Attainment	Attainment/Unclassified
Sulfur Dioxide (SO ₂)	Attainment	Attainment/Unclassified
Particulate Matter Less Than 10 Microns In Diameter (PM10)	Attainment	Non-attainment
Particulate Matter Less Than 2.5 Microns In Diameter (PM2.5)	Non-attainment	Non-attainment

Source: <http://www.valleyair.org/aginfo/attainment.htm>

^a Federal designation reflects the 8-hour standard. The national 1-hour standard was revoked on June 15, 2005.

ANALYSIS

TID filed a petition to amend the Energy Commission Decision to change Conditions of Certification **AQ-41** and **AQ-47**. Specifically, these requested changes would allow testing of only one turbine to verify compliance with startup and shutdown mass emission rates of NO_x, CO, and VOC and the deletion of language specifying that the fuel flow meter on each gas turbine must be non-resettable and totalizing. In addition, TID requested to remove requirements from the conditions of certification that are no longer applicable to the A2PP and to renumber the conditions of certification to match the numbering system used by the SJVAPCD.

Condition of Certification **AQ-41** requires source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates before the end of the commissioning period and at least once every seven years thereafter. Condition of Certification **AQ-41** also requires a RAA to be performed on the CEMS for NO_x and CO during startup and shutdown. The condition states that if the CEMS data are not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing shall be conducted every 12 months. Condition of Certification **AQ-41** references only startup and shutdown emissions. Condition of certification **AQ-42** requires initial testing of the emission rates of NO_x, CO, VOC and ammonia (NH₃) before the end of commissioning and annually thereafter for normal operations. In addition, Conditions of Certification **AQ-52, 53, and 54** require ongoing CEMS testing for normal operations.

Each combustion turbine generator (CTG) has a separate exhaust stack and is equipped with CEMS for NO_x, CO, and O₂. The conditions of certification require the CEMS to meet the installation, performance, relative accuracy, and quality assurance requirements specified in 40 CFR 60.13, Appendix B, and acid rain requirements specified in 40 CFR Part 75. Initial source testing of the units was performed in June, 2012. The testing included mass emissions testing and relative accuracy test audits (RATA) of all three units under normal operations. In addition, mass emission rates of NO_x, CO and VOC and RAA testing was

performed on only one of the units during startup and shutdown conditions. However, Condition of Certification **AQ-41**, as provided in the SJVAPCD Final Determination of Compliance (FDOC) and as adopted by the Energy Commission, applies to each of the three turbines as noted in the paragraph preceding Condition of Certification **AQ-1** in the Decision.

The initial source testing was performed by a private independent company certified by the California Air Resources Board (ARB). The company used approved source test methods to collect the emissions data and test the responses of the CEMS. The conditions of certification require the submittal of a testing protocol to the SJVAPCD and the CPM for approval prior to the actual testing. The SJVAPCD approves the protocol according to SJVAPCD policy guidelines. The SJVAPCD source test policy guidelines require sample collection to be at least 30 minutes in duration. At A2PP, based upon CEMS data, start-up duration can be as short as 6 to 12 minutes and shutdown takes approximately the same amount of time. However, in order to capture emissions during both startup and shutdown conditions and verify compliance with the time frame of the emission limitation in the conditions of certification, the RAA runs were conducted for approximately one hour to cover a complete startup and shutdown sequence. The minimum test duration for relative accuracy tests required by the Code of Federal Regulations is 21 minutes. A RATA test requires nine passing sets of measurement data whereas a RAA only requires three passing sets of data measurements to determine CEMS accuracy.

Source testing methods and CEMS are designed for accuracy under relatively steady state operations, which generally occur during normal operations. However, during startup and shut down periods the exhaust flow is dynamic. The rapid changes in temperature, pressure, and air flow volume affect the algorithms used to collect operating parameter data and calculate emissions. This can affect the accuracy of the CEMS readings under these transient conditions. In addition, the dynamic nature of the exhaust flow can cause exhaust stack constituents to become stratified, or not well mixed.

Under normal operations, the test methods account for stack constituent stratification by requiring the test probe used for sample collection in the stack to be moved, or traversed, to different points to determine if emission data collected from different points within the stack are consistent. The probe is kept in one location for several minutes of data collection before moving it to the next points for data collection. The locations and number of traverse points are determined according to approved testing methods and are dependent on stack diameter and shape. If there is significant variation in the emission readings between the different points along the traverse, then the traverse technique is used for the duration of the test. Data collected from the different points during a traverse are combined to form a representative stack emissions profile.

Source testing during startup and shutdown conditions is challenging. Each startup sequence is a unique event and parameters affecting emissions can vary during each startup sequence. Two back-to-back startup sequences on the same turbine will not necessarily be identical, nor will startup sequences done in parallel on two identical turbines. The exact duration of the startup and shutdown events for the turbines at the peaking facility is not predetermined. The turbines can complete a startup sequence within approximately 12

minutes and a shutdown event typically takes under 10 minutes. For startup sequences, emissions tend to spike very quickly, level off, and then decline to levels corresponding to normal operating conditions. The emission rate limit in the conditions of certification is on a pound-per-hour basis for startup and shutdown. Hence, the duration of the emission testing and RAA test during startup and shutdown is longer than the actual operating startup and shutdown period. Therefore, the data acquired for the RAA and emissions testing include data from normal, or steady state, operation of the turbine.

Although the conditions present during startup and shutdown are conducive to stack stratification, a traverse was not required during the startup and shutdown sampling performed at A2PP in June, 2012. The short duration of these dynamic conditions and the changing conditions in the stack profile from each change of operation continually affect the emission profile, and a conventional traverse may not accurately capture the emission profile under these changing conditions. Therefore, the data captured during a startup/shutdown sequence might be representative of a specific spot in the stack but may not represent the entire emissions profile across the stack. Due to the dynamic conditions during startup and shutdown there are inherent inaccuracies with the source testing.

The combined inaccuracies of the source test and the CEMS readings during startup and shutdown operations as described above are of an unknown magnitude. The results of the startup and shutdown testing are not designed to determine compliance with a specific emission concentration in parts per million. Rather, the results of the tests are used to establish compliance with emission rates averaged over an hour (in pounds per hour) for NO_x, CO, and VOC. The A2PP facility has CEMS for NO_x and CO, and the intent of the RAA is to determine how well the readings of the CEMS represent source test readings taken directly in the stack. If the readings are within a specified range, then the CEMS data can be used to determine ongoing compliance with the allowable emission rates. If the readings fall outside this range, only the startup and shutdown source test emission rates are used to verify compliance with the allowable emission rates.

While there are limitations with source testing and CEMS readings during startup and shutdown operations, source testing, in combination with the RAA testing requirements, is the mechanism in place used to verify compliance with the conditions of certification. The startup and shutdown testing is required to validate the values used for startup and shutdown emission calculations and to satisfy SJVAPCD best available control technology (BACT) requirements. The FDOC identifies the pound-per-hour emission rate limitation during startup and shutdown operations, in conjunction with limitations on the duration of startup and shutdown events, as BACT for the turbines. Emission rates during startup and shutdown periods are not normally guaranteed by gas turbine vendors. The purpose of the startup and shutdown testing is to validate the values used for the startup emission calculations and the BACT analysis by determining if the equipment is operating in the expected range during these periods. Given the limitations in obtaining accurate emissions data during startup and shutdown events, testing only one of the three turbines during startup and shutdown conditions, along with the additional required emissions monitoring performed on all the units during normal operations, is acceptable to staff to satisfy the compliance requirements.

The SJVAPCD reviewed the owner's request to allow RAA testing of only one turbine during startup and shutdown, rather than testing each gas turbine, and incorporated the requested changes into their permit conditions. However, the district did not consider any requirement to rotate the turbine tested, or how to retest if a CTG CEMS fails the RAA test. Energy Commission staff believes that the turbine testing should be rotated and calls for this in the Verification for Condition of Certification **AQ-41**. This would ensure that each turbine would undergo startup and shutdown testing at some point, although the RAA testing is required only once in 7 years and it would take at least 21 years to test all three turbines. The facility owner expressed reservations with a requirement which would specify a particular unit to be tested per seven-year testing event because, although the turbines are designed for quick startups, there are other external parameters which affect the ability to bring a turbine on-line.

TID requested that the Verification language be drafted in a manner which would allow for testing flexibility in case conditions change, which may delay a specific unit from coming on-line to perform the testing. While all the turbines are RATA tested annually under normal operating conditions, RATA testing is not simultaneously performed with the startup and shutdown RAA testing. Conditions could change between testing events, delaying the ability to bring a specific unit on-line. Additionally the order of testing of the individual units is not necessarily prescribed in the source test protocol. Therefore, staff concluded the Verification could be written in a manner to require rotation from turbine-to-turbine, but allow some flexibility for the operator to change which turbine to test if conditions exist that would delay the testing of a specific unit. This gives the operator the needed flexibility to respond to the system changes during testing events while providing more comprehensive testing of all three turbines. In addition, placing this language in the Verification would allow flexibility for both TID and staff to rework the Verification language specifics at a separate time if needed.

If the tested turbine fails the RAA test, Energy Commission staff recommends that the Energy Commission requires the same turbine continue to be tested within the next 12 months rather than switching to another turbine. The purpose of the CEMS RAA test is to certify that the CEMS is accurately reading stack emissions. Therefore, if the CEMS unit for any particular turbine fails the once-in-7-year "certification" for startup and shutdown periods, then in essence it means the CEMS is not accurately recording the emissions during startup and shutdown periods. In that case, per Condition of Certification **AQ-48**, compliance with the startup and shutdown emission limitations is based on the startup and shutdown emission rates obtained from the source test data for CO and NOx, and not on the CEMS data. Condition of Certification **AQ-41** requires that the startup and shutdown testing then occur every 12 months until the CEMS is determined to certifiably represent emissions during startup and shutdown. Therefore, the 12-month testing requirement must clearly be tied to each specific turbine and CEMS unit that fails the RAA startup and shutdown certification. The RAA test must demonstrate the CEMS is reading accurately again, prior to the project owner being allowed to use the CEMS data to satisfy compliance with the emission requirements. As stated above, staff recommends the language in the verification for **AQ-41** clearly state this requirement.

Condition of Certification **AQ-47** currently requires each turbine to be equipped with non-resettable and totalizing flow meters to measure the amount of natural gas combusted. The

turbines are not currently equipped with mechanical fuel meters; however each turbine is equipped with a data acquisition and handling system to read the fuel flow. The flow meter requirement is derived from District Rules 2201 and 4703. District Rule 2201 is a new source review rule designed to meet both state and federal requirements. Federal requirements outlined in 40 CFR 60.4345 specify requirements for CEMS equipment. Paragraph (c) in this section requires a fuel flow meter to be installed, calibrated, maintained, and operated according to the manufacturer's specifications when a facility is using a NOx CEMS to comply with the requirements of CFR Part 60 Standards of Performance for New Stationary Sources. Paragraph (c) further states that flow meters meeting the requirements of 40 CFR Part 75 are acceptable for use under that subpart with state approval. District Rule 4703 requires monitoring of the type and quantity of the fuel used in each gas turbine system. TID requested the language regarding the fuel meter in A2PP Condition of Certification **AQ-47** be modified by removing the term "non-resettable and totalizing" from the requirement. They believe that their computer-based approach can be used to meet the same objective.

The purpose of the flow metering requirement is to ensure the system accurately records fuel used. The fuel used in each turbine is measured and totalized by a data acquisition and handling system. The flow meters reset to zero if there is a power outage or a crash. However, the data acquisition and handling system has long-term computer storage for the fuel records. These fuel records are unaffected by a reset caused by a power outage or crash. Energy Commission staff confirmed with TID that the equipment would not receive any fuel that would not be recorded in the data acquisition system. TID explained if conditions occurred that could result in the meters resetting to zero, such as a power outage or system crash, the turbines would not be able to operate. Therefore, TID confirmed that unrecorded fuel would not be delivered to the equipment under any circumstances. While the existing electronically-based fuel metering system may not be considered as non-resettable or totalizing, such as a mechanical meter installed on a fuel line typical of boilers and engines, it does meet the intent of the requirements. The SJVAPCD makes a case-by-case determination of whether or not each data acquisition and handling system satisfies the intended requirements. The SJVAPCD determined that the monitoring technique in place is equivalent to the intent of the existing requirement and, therefore, the proposed change to the language is not considered a relaxation of the monitoring requirement. The SJVAPCD made the requested edits but also added language in the condition stating that the fuel meters must meet the requirements of 40 CFR Part 75 to ensure the system complies with the applicable LORS.

In addition, TID is requesting to make changes to other Air Quality Conditions of Certification, deleting conditions that are no longer applicable, and renumbering the remaining conditions to be consistent with the changes made to the SJVAPCD permits. Commission staff recommends deleting the conditions that have been completed but does not recommend renumbering the conditions. Generally, the conditions of certification need to retain the assigned numbering system in order to prevent confusion in tracking A2PP compliance history. While staff makes every effort to ensure the conditions of certification and district permit conditions are consistent, renumbering the conditions is not compatible with the compliance process. TID is proposing to delete Conditions of Certification **AQ-11, 12, 13, 14, 15, 16, 65, 66, 67, 68, 69, 70** and **71**. TID is proposing to reword Conditions of Certification

AQ-1, 41 and 42 by removing requirements that have already been completed. Finally, TID is requesting to combine and modify the language in Conditions of Certification **AQ-19** and **20**. The SJVAPCD has established a minimum catalyst face temperature of 540 degrees Fahrenheit and is requesting to insert the value into Condition of Certification **AQ-19**. Staff recommends deleting the current language in Conditions of Certification **AQ-11, 12, 13, 14, 15, 16, 65, 66, 67, 68, 69, 70, and 71** and replacing the existing text with the word “Deleted” in order to retain the numbering system. Staff also recommends modifying **AQ-1, 19, 20, 41, 42** and **47**, but keeping **AQ-19** and **20** as separately numbered conditions to facilitate tracking the history of these conditions.

CONCLUSIONS AND RECOMMENDATIONS

The California Energy Commission staff recommends approval of the request to modify the conditions to allow the testing of one turbine for startup and shutdown operations, to delete the requirement for the fuel meter to be non-resettable and totalizing, and to delete conditions of certification that are no longer applicable. However, staff recommends retaining the original numbering system for the Air Quality Conditions of Certification. The requested changes would conform with the applicable LORS related to Air Quality and would not result in significant Air Quality impacts. The requested changes to the condition language have already been adopted by SJVAPCD.

PROPOSED AND AMENDED CONDITIONS OF CERTIFICATION

Staff recommends the modification of the following existing air quality conditions of certification. **Bold underline** is used to indicate new language. ~~Strikethrough~~ is used to indicate deleted language.

AQ-1 ~~The permittee shall not begin actual on-site construction of the equipment authorized by this Authority to Construct until the lead agency satisfies the requirements of the California Environmental Quality Act (CEQA). [California Environmental Quality Act]~~
The Authority to Construct N-3299-4-0 (or N-3299-4, N-3288-6-0) shall be converted into Permit to Operate prior to or concurrently with the implementation of this permit. [District Rule 2201]

Verification: The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.

AQ-11 ~~Commissioning activities are defined as, but not limited to, all testing, adjustment, tuning, and calibration activities recommended by the equipment manufacturers and the construction contractor to ensure safe and reliable steady state operation of the gas turbine and associated electrical delivery systems. [District Rule 2201] Deleted.~~

Verification: ~~— No verification necessary.~~

AQ-12 ~~Commissioning period shall commence when all mechanical, electrical, and control systems are installed and individual system startup has been completed, or when a~~

gas turbine is first fired, whichever occurs first. The commissioning period shall terminate when the plant has completed initial source testing, completed final plant tuning, and is available for commercial operation. [District Rule 2201] **Deleted.**

Verification:—The project owner shall submit a commissioning plan to the CPM and APCO for approval at least 30 days prior to first firing of the gas turbine describing the procedures to be followed during the commissioning period and the anticipated duration of each commissioning activity.

AQ-13 Emission rates from the gas turbine system during the commissioning period shall not exceed any of the following limits: NO_x (as NO₂)— 40.40 lb/hr and 969.6 lb/day; VOC (as CH₄)— 8.41 lb/hr and 201.8 lb/day; CO— 40.00 lb/hr and 704.6 lb/day; PM₁₀— 2.50 lb/hr and 60.0 lb/day; or SO_x (as SO₂)— 1.56 lb/hr and 37.4 lb/day. [District Rule 2201] **Deleted.**

Verification:—A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (**AQ-SC8**).

AQ-14 During commissioning period, NO_x and CO emission rate shall be monitored using installed and calibrated Continuous Emission Monitoring Systems (CEMS). [District Rule 2201] **Deleted.**

Verification:—The project owner shall submit to the CPM and APCO for approval the commissioning plan as required in **AQ-12**.

AQ-15 The total mass emissions of NO_x, VOC, CO, PM₁₀ and SO_x that are emitted during the commissioning period shall accrue towards the quarterly emission limits. [District Rule 2201] **Deleted.**

Verification:—A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (**AQ-SC8**).

AQ-16 During commissioning period, the owner or operator shall keep records of the natural gas fuel combusted in the gas turbine system on an hourly and daily basis. [District Rule 2201] **Deleted.**

Verification:—A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (**AQ-SC8**).

AQ-19 During all types of operation (with an exception of ammonia injection tuning prior to the initial source test during the commissioning period), including startup and shutdown periods, ammonia injection into the SCR system shall occur once the minimum temperature of **540°F** at the catalyst face has been reached to ensure NO_x emission reductions can occur with a reasonable level of ammonia slip. The minimum catalyst face temperature shall be determined during the final design phase

~~of this project and shall be submitted to the District at least 30 days prior to commencement of construction. [District Rule 2201]~~

Verification: The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.

AQ-20 ~~The District shall administratively add the minimum temperature limitation established pursuant to the above Condition in the final Permit to Operate.~~ The District may administratively modify the temperature as necessary following any replacement of the SCR catalyst material. [District Rule 2201]

Verification: The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.

AQ-41 Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted ~~before the end of the commissioning period and at least once every seven years thereafter~~ **on one of the three gas turbines (N-3299-4, '-5 or '-6)**. CEMS relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEMS data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing **on one of the three gas turbines** shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEMS data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the ~~once-every-seven-years~~ schedule. [District Rule 1081]

Verification: **The project owner shall rotate the turbine tested for startup and shutdown operations until all of the units have been tested during startup and shutdown operations. If, however, the testing indicates the CEMS data is not certifiable, then the same turbine will be tested until the CEMS data is certifiable during startup and shutdown operations.** The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a preapproved protocol (**AQ-39**).

AQ-42 Source testing to determine compliance with the NO_x, CO, VOC₁ and NH₃ emission rates (lb/hr and ppmvd @ 15% O₂) and PM₁₀ emission rate (lb/hr) shall be conducted ~~before the end of commissioning period and at least once every 12 months thereafter.~~ [District Rules 2201 and 4703, 40 CFR 60.4400(a)]

Verification: The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a preapproved protocol (**AQ-39**). Testing for steady-state emissions shall be conducted upon initial operation and at least once every 12 months.

AQ-47 A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 4703]

Verification: The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.

AQ-65 ~~Prior to operating under ATCs N-3299-4-0, N-3299-5-0 and N-3299-6-0, the permittee shall mitigate the following quantities of NO_x: 1st quarter: 34,905 lb, 2nd quarter: 35,292 lb, 3rd quarter: 35,682 lb, and 4th quarter: 35,682 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Deleted.~~

Verification: ~~The project owner shall submit to both the District and CPM records showing that the project's offset requirements have been met prior to initiating operation.~~

AQ-66 ~~NO_x ERC S-3113-2 (or a certificate split from this certificate) shall be used to supply the required NO_x offsets, unless a revised offsetting proposal is received and approved by the District. Following the revisions, this Authority to Construct permit shall be re-issued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to re-issuance of this Authority to Construct permit. [District Rule 2201] Deleted.~~

Verification: ~~The project owner shall submit to both the District and CPM records showing that the project's offset requirements have been met prior to initiating operation.~~

AQ-67 ~~Prior to operating under ATCs N-3299-4-0, N-3299-5-0 and N-3299-6-0, the permittee shall mitigate the following quantities of VOC: 1st quarter: 6,113 lb, 2nd quarter: 6,113 lb, 3rd quarter: 6,114 lb, and 4th quarter: 6,114 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Deleted.~~

Verification: ~~The project owner shall submit to both the District and CPM records showing that the project's offset requirements have been met prior to initiating operation.~~

AQ-68 ~~VOC ERC C-1008-1 (or a certificate split from this certificate) shall be used to supply the required VOC offsets, unless a revised offsetting proposal is received and approved by the District. Following the revisions, this Authority to Construct permit shall be re-issued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to re-issuance of this Authority to Construct permit. [District Rule 2201] Deleted.~~

Verification: ~~The project owner shall submit to both the District and CPM records showing that the project's offset requirements have been met prior to initiating operation.~~

~~**AQ-69** Prior to operating under ATCs N 3299 4 0, N 3299 5 0 and N 3299 6 0, the permittee shall mitigate the following quantities of PM10: 1st quarter: 13,506 lb, 2nd quarter: 13,507 lb, 3rd quarter: 13,507 lb, and 4th quarter: 13,507 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4 2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] **Deleted.**~~

~~**Verification:**—The project owner shall submit to both the District and CPM records showing that the project's offset requirements have been met prior to initiating operation.~~

~~**AQ-70** SO_xERC S 3129 5 (or a certificate split from this certificate) shall be used to supply the required PM10 offsets, unless a revised offsetting proposal is received and approved by the District. Following the revisions, this Authority to Construct permit shall be re-issued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to re-issuance of this Authority to Construct permit. [District Rule 2201] **Deleted.**~~

~~**Verification:**—The project owner shall submit to both the District and CPM records showing that the project's offset requirements have been met prior to initiating operation.~~

~~**AQ-71** The District has authorized to use SO_x reductions to offset emissions increase in PM10 at SO_x/PM10 interpollutant offset ratio of 1.00. [District Rule 2201] **Deleted.**~~

~~**Verification:**—No verification necessary.~~

REFERENCES

The tn: 00000 in a reference below indicates the transaction number under which the item is catalogued in the Energy Commission's Dockets Unit. The transaction number allows for quicker location and retrieval of individual items docketed for a case or used for ease of reference and retrieval of exhibits cited in briefs and used at hearings.

CEC 2010—California Energy Commission (tn 59270) Almond 2 Power Plant Project Commission Decision, docketed December 17, 2010.

SJVAPCD 2010—San Joaquin Valley Air Pollution Control District (tn 55530) Notice of Final Determination of Compliance (FDOC): Turlock Irrigation District (09-AFC-02), docketed February 22, 2010.

SJVAPCD 2013—San Joaquin Valley Air Pollution Control District, Authority to Construct Application Review, submitted March 11, 2013.

TID 2013a—Turlock irrigation District, Petition to Amend Air Quality Conditions of Certification for the Almond 2 Power Project, Amendment No.1 (tn 69643), submitted February 22, 2013.

TID 2013b—Turlock Irrigation District, Almond 2 Power Plant Condition AQ-SC6: Submittal of SJVAPCD Amended ATCs, submitted June 17, 2013.

TID 2013c—Turlock Irrigation District. Almond 2 Power Plant Condition AQ-SC6: Submittal of SJVAPCD Amended Title V Operating Permit, submitted July 2, 2013.

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov

California Energy Commission

**DOCKETED
09-AFC-2C**

TN # 69932

MAR. 15 2013

**NOTICE OF RECEIPT****PETITION TO AMEND****THE CALIFORNIA ENERGY COMMISSION DECISION for the
ALMOND 2 POWER PLANT PROJECT (09-AFC-2C)**

On February 22, 2013, the Turlock Irrigation District, owner of the Almond 2 Power Plant, filed a petition with the California Energy Commission (Energy Commission) requesting to modify provisions in the Almond 2 Power Plant Final Decision (Decision). The approximately 174-megawatt project was certified by the Energy Commission in December of 2010 and began commercial operation in July of 2012. The facility is located in the City of Ceres, in Stanislaus County, California.

DESCRIPTION OF PROPOSED MODIFICATION

The modifications proposed in the petition would amend Air Quality Conditions of Certification **AQ-41** and **AQ-47**.

- The proposed modification to **AQ-41** would expressly allow startup and shutdown emissions testing every seven years on one of the gas turbines.
- The proposed modification to **AQ-47** would delete the requirement that the fuel flow meter on each gas turbine be “non-resettable and totalizing” to avoid possible inconsistencies with Title 40, Code of Federal Regulations, parts 60 and 75.

ENERGY COMMISSION AMENDMENT REVIEW PROCEDURES

The purpose of the Energy Commission’s review process is to assess the impacts of this proposal on environmental quality and on public health and safety. The review process includes an evaluation of the consistency of the proposed changes with the Energy Commission’s Decision and a determination on whether the project, as modified, will remain in compliance with applicable laws, ordinances, regulations, and standards (Title 20, California Code of Regulations, section 1769). Energy Commission staff is currently analyzing the request and will publish an analysis in the near future. A public hearing for the purpose of approving, denying, or modifying the amendment proposal will be held at a regularly scheduled Energy Commission business meeting.

This Notice of Receipt is being mailed to interested parties and property owners adjacent to the project site who may want to participate in the amendment process.

The petition is available on the Energy Commission’s website at:

http://www.energy.ca.gov/sitingcases/almond/amendment_one/index.html. The staff analysis, when published, will also be posted on the website. If you would like to

receive a hard copy of the petition and/or staff's analysis, please complete the enclosed Information Request Form and return it to the address shown.

If you have any comments or questions, please contact Bruce Boyer, Compliance Project Manager, at (916) 653-7181, or by fax to (916) 654-3882, or via e-mail at: Bruce.Boyer@energy.ca.gov

Any person may file written comments on the Petition to Amend. All comments must be in writing and must be sent to the Energy Commission Dockets Unit. Please include the docket number (09-AFC-2C) in the subject line or first paragraph of your comments. Those submitting comments electronically should provide them in either Microsoft Word format or as a Portable Document Format (PDF) to docket@energy.ca.gov. Please include your name or your organization's name in the file name. Those preparing non-electronic written comments should mail or hand-deliver them to:

California Energy Commission
Dockets Unit, MS-4
Docket No. 09-AFC-2C
1516 Ninth Street
Sacramento, CA 95814-5512

All written comments and all materials filed with the Dockets Unit will become part of the public record of the proceeding. Additionally, comments may be posted to the website.

For further information on how to participate in this proceeding, please contact the Energy Commission Public Adviser's Office, at (916) 654-4489, or at (800) 822-6228 (toll free in California), or by e-mail at publicadviser@energy.ca.gov. News media inquiries should be directed to the Energy Commission Media Office at (916) 654-4989, or by e-mail at mediaoffice@energy.ca.gov.

Date: _____

CHRISTOPHER J. MARXEN, Manager
Compliance Office
Siting, Transmission & Environmental Protection
Division

Enclosure: Information Request Form

Mail List # **7351,7352,7353,7354 & POS**

INFORMATION REQUEST FORM

COMPLETE & MAIL TO: CALIFORNIA ENERGY COMMISSION
COMPLIANCE UNIT
ATTN: Bruce Boyer
1516 NINTH STREET, MS-2000
SACRAMENTO, CA 95814

OR FAX TO: (916) 654-3882

NAME AND/OR TITLE (AS IT IS TO APPEAR ON MAIL LABEL)

ORGANIZATION (IF APPLICABLE)

STREET ADDRESS OR P.O. BOX

CITY

STATE

ZIP CODE

PROPOSED AMENDMENT TO THE COMMISSION DECISION TO: AMEND CERTAIN AIR QUALITY AND VISUAL CONDITIONS OF CERTIFICATION

PLEASE CHECK THE DOCUMENTS YOU WOULD LIKE TO RECEIVE:

- PETITION TO AMEND on CD (if available)
 STAFF ANALYSIS on CD (if available)

PROJECT: Almond 2 Power Plant

DOCKET NO: 09-AFC-2C

MAIL LIST NO: 7351,7352,7353,7354 & POS

PLEASE REMOVE MY NAME FROM THE ALMOND 2 POWER PLANT PROJECT MAILING LIST