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DOCKET
03-AFC-2
DATE AUG 29 2005
RECD. SEP 1 2005

August 29, 2005

Bob Eller
Project Manager, Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

RE: 03-AFC-2, Los Esteros Critical Energy Facility Phase 2

Dear Mr. Eller:

The District is submitting the following errata for the Final Determination of Compliance (FDOC) issued by the District on June 28, 2005 for the combined-cycle conversion of the Los Esteros Critical Energy Facility.

Page 33, Permit Condition limiting daily emissions during the commissioning period

Permit Condition #10 should read as follows:

10. The owner/operator shall not operate the facility such that the pollutant mass emissions from each turbine (S-1, S-2, S-3 and S-4 Gas Turbines) and corresponding HRSG (S-7, S-8, S-9, and S-10 Heat Recovery Steam Generators) exceed the following limits during the commissioning period. These emission limits shall include emissions resulting from the start-up and shutdown of the S-1, S-2, S-3 and S-4 Gas Turbines.

	Without Controls		With Controls	
NO_x (as NO_2)	1464 lb/day	102 lb/hr	1464 lb/day	61 lb/hr
CO	1056 lb/day	88 lb/hr	984 lb/day	41 lb/hr
POC (as CH_4)	288 lb/day		288 lb/day	
PM_{10}	~~96~~ 60 lb/day		~~96~~ 60 lb/day	
SO_2	~~18.9~~ 41.6 lb/day		~~18.9~~ 41.6 lb/day	

(basis: cumulative increase)

Page 38, Sulfur Monitoring Permit Condition

Because the federal new source performance standard (NSPS) for gas turbines that is the basis of this permit condition has been modified to allow for vendor certification of fuel sulfur content, this condition should have been deleted from the FDOC. Therefore, condition #29 should read as follows:

~~24.~~ Deleted ~~The owner/operator shall comply with the applicable requirements of 40 CFR Part 60 Subpart GG, excluding sections 60.334(a) and 60.334(c)(1). The sulfur content of the natural gas fuel shall be monitored in accordance with the following custom schedule approved by the USEPA on August 14, 1987:~~
~~a. The sulfur content shall be measured twice per month for the first six months of operation.~~

~~b. If the results of the testing required by Part 29a are below 0.2% sulfur by weight, the sulfur content shall be measured quarterly for the next year of operation.~~
~~c. If the results of the testing required by Part 29b are below 0.2% sulfur by weight, the sulfur shall be measured semi-annually for the remainder of the permit term.~~
~~d. The nitrogen content of the fuel gas shall not be monitored in accordance with the custom schedule. (Basis: NSPS)~~

Page 39, Recordkeeping and Reporting Requirements

Because fuel sulfur content monitoring has been eliminated, permit condition #34 has been corrected as follows:

25. Reporting: The owner/operator shall submit to the District a written report for each calendar quarter, within 30 days of the end of the quarter, which shall include all of the following items:

    a. Daily and quarterly fuel use and corresponding heat input rates
    b. Daily and quarterly mass emission rates for all criteria pollutants during normal operations and during other periods (startup/shutdown, breakdowns)
    c. Time intervals, date, and magnitude of excess emissions
    d. Nature and cause of the excess emission, and corrective actions taken
    e. Time and date of each period during which the CEM was inoperative, including zero and span checks, and the nature of system repairs and adjustments
    f. A negative declaration when no excess emissions occurred
    g. Results of quarterly fuel analyses for HHV ~~and total sulfur content~~.

(Basis: recordkeeping & reporting)

Page 40, Hazardous air pollutant Source testing requirement

Permit condition #45 contains an incorrect reference and should read as follows:

45. Within 60 days of start-up of the Los Esteros Critical Energy Facility and on a biennial (once every two years) thereafter, the owner/operator shall conduct a District-approved source test at exhaust point P-1, P-2, P-3, or P-4 while the Gas Turbines are at maximum allowable operating rates to demonstrate compliance with Part ~~43~~ 44. If three consecutive biennial source tests demonstrate that the annual emission rates for any of the compounds listed above calculated pursuant to part ~~43~~ 44 are less than the BAAQMD Toxic Risk Management Policy trigger levels shown below, then the owner/operator may discontinue future testing for that pollutant.

Formaldehyde	<	132 lb/yr
Acetaldehyde	<	288 lb/yr
Specified PAHs	<	0.18 lb/yr
Acrolein	<	15.6 lb/yr

If you have any questions regarding this matter, please contact me at (415) 749-4707.

Very truly yours,

Dennis Jang
Senior Air Quality Engineer
Engineering Division

cc: Dana Petrin, Calpine
Nancy Matthews, Sierra Research

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE LOS ESTEROS CRITICAL ENERGY FACILITY, PHASE 2 (LOS ESTEROS 2)	**DOCKET NO. 03-AFC-2** **(Revised 7/21/05)** ***PROOF OF SERVICE***

DOCKET UNIT

Send an original signed document plus 12 copies and/or an electronic copy plus one printed copy to the address below:

CALIFORNIA ENERGY COMMISSION
DOCKET UNIT, MS-4
Attn: Docket No. 03-AFC-2
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

In addition to the documents sent to the Commission Docket Unit, also send individual copies of any documents to:

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DECLARATION OF SERVICE

I **Evelyn M Johnson** declare that on **September 1, 2005**, I deposited copies of the attached **Bay Area AQMD re: errata for the FDOC issued by the District on June 28, 2005** in the United States mail at Sacramento, CA with first class postage thereon fully prepaid and addressed those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of the California Code of Regulations, title 20, sections 1209, 1209.5, and 1210.

I declare under penalty of perjury that the foregoing is true and correct.

Evelyn M Johnson
[signature]

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FOR YOUR INFORMATION ONLY! Parties DO NOT mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

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