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.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Without Controls</th>
<th>With Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx (as NO2)</td>
<td>1464 lb/day 102 lb/hr</td>
<td>1464 lb/day 61 lb/hr</td>
</tr>
<tr>
<td>CO</td>
<td>1056 lb/day 88 lb/hr</td>
<td>984 lb/day 41 lb/hr</td>
</tr>
<tr>
<td>POC (as CH4)</td>
<td>288 lb/day</td>
<td>288 lb/day</td>
</tr>
<tr>
<td>PM10</td>
<td>96 60 lb/day</td>
<td>96 60 lb/day</td>
</tr>
<tr>
<td>SO2</td>
<td>41.6 lb/day</td>
<td>41.6 lb/day</td>
</tr>
</tbody>
</table>

(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:

29. 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:

- The sulfur content shall be measured twice per month for the first six months of operation.

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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.

e. 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
Mr. Bob Eller  
August 29, 2005  
Page 3

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:

COUNSEL FOR APPLICANT

Ellison, Schneider & Harris LLP
Greg L. Wheatland
2015 H Street
Sacramento, CA 95814
glw@eslawfirm.com

INTERESTED AGENCIES

San Jose Dept. of City Planning and Building Code Enforcement
Richard Buikema, Sr. Planner II
801 N. First Street, Room 400
San Jose, CA 95110
rich.buikema@ci.sj.ca.us

County of Santa Clara Planning Office
Bob Eastwood
County Government Center
70 West Hedding Street
East Wing, 7th Floor
San Jose, CA 95110-1705

Santa Clara Valley Water District
Luis Jaimes
5750 Almaden Expressway
San Jose, CA 95118-3686

APPLICANT

Calpine
Rick Tetzloff, Project Manager
700 NE Multnomah, Suite 870
Portland, OR 97232

Steve De Young
Environmental Manager
4155 Arbolado Drive
Walnut Creek, CA 94598
steve4155@astound.net
California Air Resources Board (CARB)
Michael Tollstrup
Project Assessment Branch
P.O. Box 2815
Sacramento, CA 95812
mtoilstr@arb.ca.gov

Electricity Oversight Board
770 L St., Suite 1250
Sacramento, CA 95814

Doug Davy
Sr. Project Manager
CH2M Hill
2485 Natomas Park Dr., # 600
Sacramento, CA 95833
ddavy@ch2m.com

William DeBoisblanc, Director Permit
Services
Bay Area Air Quality Mgmt. District
939 Ellis Street
San Francisco, CA 94109

REGIONS

Regional Water Quality Control Board
(RWQCB)
Judy Huang
1515 Clay Street, Suite 1400
Oakland, CA 94612
jch@rb2.swrcb.ca.gov

CURE
Marc D. Joseph, Esq.
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd., Suite 1000
South San Francisco, CA 94080
mdjoseph@adamsbroadwell.com

City of San Jose
Environmental Services Department
Municipal Water System Division
3025 Tuers Road
San Jose, CA 95121

Intervenors

CARE
Michael E. Boyd, President
5439 Soquel Drive
Soquel, CA 95073
michaelboyd@sbcglobal.net

Interested Participants

California for Renewable Energy, Inc.
(CARE)
Robert Sarvey
501 W. Grantline Road
Tracy, CA. 95376
sarveybob@aol.com

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 address 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.

[Signature]
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