

From: Keith.McGregor@CH2M.com
Sent: Friday, April 16, 2010 9:12 PM
To: Brenda Cabral
Cc: Madhav Patil; Jerry.Salamy@CH2M.com; Doug.Urry@CH2M.com;
b.buchynsky@dgc-us.com
Subject: RE: MEP CAM and CO limits

Good Evening Brenda,

Here is our interpretation of the CAM applicability requirements for MEP:

Using an average uncontrolled CO emission rate of 17.05 lb/hr (i.e., the uncontrolled CO emission rate for the annual average temperature of 59F - see attached Table 5.1B.2 from Volume II of the AFC), the maximum annual uncontrolled CO emission rate per turbine would be less than 100 tons per year assuming a conservative assumption that the turbine would be operated every hour of the year (i.e., 17.05 lb/hr * 8,760 hours = 149,358 lbs per year or 74.7 tons per year per turbine).

Therefore, because the turbine will not be operated for more than 4,000 hours per year and 300 startup and shutdown events, it is our interpretation that the CO potential to emit emissions per turbine before abatement would be less than the 100 tpy limit and the project would not be subject to the CAM provisions.

Please let me know if you have any additional questions regarding our conclusion.

Thank you,

Keith McGregor
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-----Original Message-----

From: Brenda Cabral [mailto:BCabral@baaqmd.gov]
Sent: Thursday, April 15, 2010 3:35 PM
To: McGregor, Keith/SAC
Cc: Madhav Patil
Subject: CAM and CO limits

Keith: I am working on applicability for CAM (40 CFR 64) for CO. It depends on whether emissions of CO before abatement will be more or less than 100 tpy for each

turbine separately. The worst-case concentration would say yes, the worst-case, no. NOx is exempt due to the Part 75 monitoring.

Since you probably would hate to have a condition that said that you couldn't emit more than 100 tpy CO per turbine before abatement, and the stacks will have CEMs that will comply easily with CAM, shall we just say that you will be subject when you get your Title V permit?

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