Kathleen Truesdell

From: Bukunt, Pete J (GE Energy) <pete.bukunt@ge.com>
Sent: Monday, December 20, 2010 9:37 AM
To: Kathleen Truesdell
Cc: jim.mclucas@radback.com; Matis, Craig (GE Power & Water); Greg Darvin
Subject: RE: Oakley: GE Confirmation letters re SU/SD and Auto Tuning

Kathleen,

In response to your email, I hope this helps clarify the issue. GE's definitions for warm and cold starts are specific durations following a shutdown (48 hours and 72 hours, respectively). The District has properly interpreted GE's definitions in the development of the hot, warm, and cold start definitions included in the PDOC. Since GE's predicted emissions and durations for hot and warm starts are identical, it makes sense to cover hot/warm starts by a single definition (i.e. "a gas turbine startup that occurs within 48 hours of a gas turbine shutdown"). For starts occurring between 48 and 72 hours after a gas turbine shutdown, GE would expect the emissions to be more than those of a hot/warm startup, but less than those of a cold startup. Since the PDOC includes emissions limits for each type of startup, it is appropriate to define a cold startup as "a gas turbine startup that occurs more than 48 hours after a gas turbine shutdown".

The Standby Period is when the gas turbine is offline, but the gas turbine and HRSG is kept in a stand-by configuration as described in Note 2 of Table 2 so as to maintain the thermal energy within the combined cycle system. This would be the normal offline configuration except during outages or other periods where the plant is to remain offline for several days or more.

If you need further info, let me know. Also, if you need this note in a letter format, let me know as well, and I will prepare one and send it over.

Thanks again and hope you have a Happy Holiday,

Pete

-----Original Message-----
From: Kathleen Truesdell [mailto:ktruesdell@baaqmd.gov]
Sent: Friday, December 10, 2010 4:16 PM
To: Bukunt, Pete J (GE Energy)
Cc: jim.mclucas@radback.com; Matis, Craig (GE Power & Water)
Subject: RE: Oakley: GE Confirmation letters re SU/SD and Auto Tuning

Pete,

Thank you for your letters. In the letter regarding emissions, the notes for Table 2 define hot, warm, and cold starts. In the District's permit conditions, we also define hot, warm and cold starts; however we typically define a cold start as 48 hours after shutdown since we are establishing not-to-exceed limits.

Can you explain which estimated emissions the units proposed for Oakley Generating Station will be able to meet in a startup 48 or more hours after shutdown? (i.e. which estimates are valid for between 8 and 48 hours of shutdown? which estimates are valid for >48 to 72 hours of shutdown?)

Also, when is the Standby Period?

Thanks,
Kathleen

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From: Bukunt, Pete J (GE Energy) [mailto:pete.bukunt@ge.com]
Sent: Sat 12/4/2010 7:19 AM
To: Kathleen Truesdell
Cc: jim.mclucas@radback.com; Matis, Craig (GE Power & Water); Brian Bateman
Subject: Oakley: GE Confirmation letters re SU/SD and Auto Tuning

Kathleen,

Attached, as requested, are two letters representing:

(1) GE's confirmation of the guarantee emissions and estimated start up and shut down emissions for the Oakley Generating Station and

(2) GE's comments relative to conditions related to autotuning of the 7FA.05.

I had these ready to send a few days ago, but got sidetracked. I apologize for not getting these into your hands more promptly. I will send over the originals by mail.

I think this responds to what the District was looking for. Naturally, if there are any questions, or further concerns on these items or actually anything else, please feel free to contact me.

Regards,

Pete

Note New Address eff 11/1/2010:

Pete Bukunt

Sr. Account Executive

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