

From: Bertolini, Tom [<mailto:tom.bertolini@genon.com>]

Sent: Tuesday, May 15, 2012 11:46 PM

To: Madhav Patil

Subject: Comments to the Title V Renewal Permit for Pittsburg Generating Station

Madhav,

We have the following comments to the Title V Renewal Permit and Permit Evaluation/Statement of Basis documents for Pittsburg Generating Station (Facility No. A0012):

Comments to Permit Evaluation/Statement of Basis:

1. In Section B "Facility Description", the 2005 plant inventory emissions listed are inaccurate. The correct emissions should be:

	NOx (tpy) (tpy)	CO (tpy)	SO2 (tpy)	VOC (tpy)	PM
S-5	17.6	158.8	1.2	10.4	14.4
S-6	11.3	91.9	0.7	6.0	8.3
S-7	11.3	58.1	0.4	3.8	5.3
Total	40.2	308.8	2.3	20.2	28.0

2. In Section B "Facility Description", the 2010 plant inventory emissions listed are inaccurate. The correct emissions should be:

	NOx (tpy) (tpy)	CO (tpy)	SO2 (tpy)	VOC (tpy)	PM
S-5	2.9	12.9	0.1	0.84	1.2
S-6	3.4	14.5	0.11	0.95	1.3
S-7	0.0	0.0	0.0	0.0	0.0
Total	6.3	27.4	0.21	1.79	2.5

3. In Section B "Facility Description", the total emission reductions between 2005 and 2010 should be based on the revised values listed above.
4. In Section B "Facility Description", last paragraph, aqueous ammonia is stored in only two horizontal steel storage tanks. There are 3 tanks installed at the facility, but only two are in service.

5. In Section C, Permit Content, I. Standard Conditions, (p. 6, 2nd paragraph): since only two aqueous ammonia storage tanks are in service, there is 40,000 gallons capacity.
6. In Section C, Permit Content, I. Standard Conditions, Changes to Permit (p. 6): the addition of BAAQMD Regulation 2, Rule 9 is not identified in the Changes to Permit.
7. Under Section IV, Source Specific Applicable Requirements, Changes to Permit delete "diesel" from 3rd paragraph below S5 through S7, Electrical Generation Boilers (p. 9). Boilers 5 through 7 previously fired Fuel Oil No. 6.

Comments to the Title V Renewal Permit:

1. In Section I. Standard Conditions, A. Administrative Requirements,(p. 3) of the permit, SIP regulation 2, Rule 6 has not been added to the permit as stated in the Permit Evaluation/Statement of Basis document.
2. In Section XI ,Title IV Acid Rain Permit (p. 66), the last name of the Alternate Designated Representative is misspelled. The correct spelling should be "Boudreaux".

We appreciate the opportunity to provide comments to the Title V Renewal Permit for Pittsburg Generating Station (Facility A0012). If you have any questions regarding these comments, please contact me at (925) 427-3503.

Thank-you,

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