

July 22, 2004

Ms. Deborah Jordan, Director
Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Ms. Jordan:

The District has completed the evaluation of the following application for renewal of a Major Facility Review and Acid Rain Permit:

	Plant #	Plant Name	Address, City	Type of Operation
CONTRA COSTA COUNTY Mark DeSaulnier Mark Ross Gayle Uilkema (Secretary)	A0026	Mirant Potrero LLC	1201-A Illinois Street. San Francisco, CA 94107	Generation of Electricity

MARIN COUNTY
Harold C. Brown, Jr.

The public comment procedures for this permit have been completed as follows: The public notice for this permit was published in the San Francisco Chronicle on March 30, 2004. The notice stated that the end of the public comment period was May 13, 2004. The notice announced a public hearing on May 6, 2004, at the Potrero Hill Neighborhood House (Theater) at 953 De Haro Street, San Francisco, CA from 6:30 p.m. to 9 p.m., which was held as planned. Written comments were also received from the public and various agencies.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Chris Daly
Jake McGoldrick
Vacant

In response to comments from Mirant, BAAQMD Regulation 9-11-302 and 9-11-302.1 were retained as applicable requirements, BAAQMD Regulation 9-11-309.3 and 9-11-309.4 were changed to be not federally enforceable, all references to diesel oil for S1, Boiler, were changed to fuel oil, the CEMS requirement in Permit Condition ID# 21294 to measure O2 was expanded to either O2 or CO2 and the S10 through S15, Turbine output and firing capacity were increased.

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY
Erin Garner
Liz Kniss
Patrick Kwok
Julia Miller

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

A Compliance Assurance Monitoring (CAM) plan was added for sources S10 through S15, Turbines, in response to a verbal comment from EPA. The plan has been implemented in BAAQMD Condition 15816. The main additions to the condition are the flowmeter accuracy requirement in part 3c and a flowmeter calibration requirement in part 3d. Although the flowmeter accuracy requirement is new, the existing flowmeters meet the requirement. The continuous measurement and daily recordkeeping of water-to-fuel ratio were part of the existing monitoring. The water-to-fuel ratio is the same one in use prior to imposition of the CAM plan. The only wholly new addition is the requirement to test for nitrogen in the fuel. Since the CAM plan in this case is a slight improvement over the existing monitoring, the District believes that a new public notice and comment period is not necessary. If EPA disagrees with this position, please inform us as soon as possible.

The District has not made any other changes due to comments. The District will respond formally to comments and will post those responses on our website.

The District is transmitting the permit to EPA for review. Enclosed for your information are copies of the proposed permit and the evaluation report/statement of basis. The comments are available on the District's website. If you have any questions regarding this project, please call Steve A. Hill, Permit Evaluation Section Manager, at (415) 749-4673.

Very truly yours,

Signed by Peter Hess for Jack P. Broadbent
Jack P. Broadbent
Executive Officer/
Air Pollution Control Officer

SAH:BFC:myl
Enclosures

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