



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

November 16, 2011

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

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review permit for the following facility.

| Facility | Facility Name | Application | Permit Engineer | City | County |
|----------|----------------------|-------------|-----------------|----------|--------------|
| A1820 | Martinez Cogen, L.P. | 23486 | T. Hull | Martinez | Contra Costa |

This proposed revision was requested by the facility and includes the following changes to the permit:

- Allows daily averaging for maximum fuel usage requirement for the Gas Turbines S-10 and S-11. For the purposes of all applicable emissions limits for the turbines, a daily fuel use limit is equivalent to an hourly limit.
- Updates BAAQMD Regulation 9, Rule 9 NOx requirements in permit conditions and tables to reflect regulation changes.
- Removes H₂S monitoring requirements when firing only natural gas. The Gas Turbines S-10 and S-11 are permitted to be fueled by either natural gas or refinery gas. Due to the variability of sulfur compounds that may exist in refinery process gas, H₂S monitoring has been a permit requirement for the turbines in order to demonstrate on-going compliance with SO₂ emissions limits. However, the facility has not actually used refinery gas as a fuel for several years, but continues to monitor H₂S when exclusively firing natural gas. Since the allowable amount of sulfur in commercial natural gas is limited by the Public Utilities Commission (PUC), continuous monitoring for H₂S is not necessary.

The proposed Major Facility Review Permit and Evaluation can be viewed and/or downloaded on the BAAQMD website at: <http://www.baaqmd.gov/Divisions/Engineering/Title-V-Permit-Programs/Title-V-Permits.aspx>. We will also send the final permit to you via the Electronic Permit Submittal System. If you have any questions regarding this permit, please call Barry Young, Air Quality Engineering Manager, at (415) 749-4721.

Sincerely yours,

Signed Jack Colbourn for Jack P. Broadbent
Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

JPB:JC:dtj

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Spare the Air

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Jack P. Broadbent
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