

Calpine Gilroy Cogen, LP & Gilroy Energy Center, LLC

1400 Pacheco Pass Highway
P.O. Box 1764
Gilroy, CA 95021

March 1, 2012

Brian Lusher
Senior Air Quality Engineer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

**Re: Calpine Gilroy Cogen, LP and Gilroy Energy Center LLC
(Facility #B1180)
Proposed Major Facility Review Permit**

Dear Mr. Lusher,

Calpine Gilroy Cogen, LP and Gilroy Energy Center, LLC is submitting comments to the Proposed Major Facility Review Permit that was issued by BAAQMD.

- Cover page:
 - Change facility contact from Michael Fees to Maria Barroso, EHS Specialist II, (831) 385-7943.
 - Change Alternate Responsible Official from Michael Fees to Lance Null, Plant Engineer, (408) 337-3430.
- Table IV and Table VII: remove all instances of "after dry low NOx combusters become operational (by 1/1/2012)" from the Effective Future Date column since the date has already passed.
- Table IV-B: Remove 60.334(b) from applicable requirements – S-100 no longer employs steam injection for NOx control.
- Permit 2780:
 - delete conditions 1a(i), 1b(i), 1e – these conditions no longer applicable since dry low NOx burners already in operation
 - Condition 4 should be clarified to clearly indicate that S-101 and S-102 are subject to 30 ppm limit imposed by Reg 9-7-301.1 instead of the 40 ppm limit referenced in the Condition.
 - Delete last sentence of Condition 9b – dry low NOx burners are already in service
- Table VII-B: remove references to Condition 2780 parts 1a(i) and 1e – conditions are no longer applicable since dry low NOx burners already in operation
- Acid Rain Permit: Change Facility Contact Person from Michael Fees to Lance Null, Plant Engineer, (408) 337-3430.

Thank you again for the opportunity to further comment on this draft permit. Should you have any questions or wish to discuss these comments further, please do not hesitate to call me at (831) 385-7943 or David Williams at (925) 557-2237.

I certify based on information and belief formed after reasonable inquiry, the statement and information in this document and supplements are true, accurate, and complete.

Respectfully,

Maria Barroso
Authorized Signatory and EHS Specialist II

Brian Lusher

From: Maria Barroso <Maria.Barroso@calpine.com>
Sent: Thursday, March 01, 2012 1:14 PM
To: Brian Lusher
Subject: Title V Permit Renewal Gilroy Cogen comments 2012
Attachments: Title V Permit Renewal Gilroy Cogen comments March 2012.doc

Hi Brian,

Calpine Gilroy is submitting the following comments for the proposed Title V permit renewal.

Thanks, Maria

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