



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

October 3, 2011

**ALAMEDA COUNTY**  
Tom Bates  
(Chairperson)  
Scott Haggerty  
Jennifer Hosterman  
Nate Miley

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

Dear Ms. Jordan:

**CONTRA COSTA COUNTY**  
John Gioia  
(Vice-Chair)  
David Hudson  
Mark Ross  
Gayle B. Uilkema

This is to advise you that the Bay Area Air Quality Management District is issuing the renewal Major Facility Review Permit for the following facility.

Facility	Facility Name	Application	Permit Engineer	City	County
B1866	Los Medanos Energy Center, LLC	14296	B. Lusher	Pittsburg	Contra Costa

**MARIN COUNTY**  
Harold C. Brown, Jr.

The 30-day public comment period on the proposed renewal permit ended on June 30, 2011 and the 45-day EPA review period ended on July 9, 2011. No comments were received from the EPA, or ARB. Calpine and a member of the public submitted comments on the draft permit. The comments submitted and the District response to comment documents are attached.

**NAPA COUNTY**  
Brad Wagenknecht

The final permit contains the following changes:

**SAN FRANCISCO COUNTY**  
John Avalos  
Edwin M. Lee  
Eric Mar

Section 1B submittal dates were revised based on the issuance date of the final Title V permit.

**SAN MATEO COUNTY**  
Carole Groom  
Carol Klatt

**SANTA CLARA COUNTY**  
Susan Garner  
Ash Kalra  
(Secretary)  
Liz Kniss  
Ken Yeager

In Table II-A, the MW load for each gas turbine and heat recovery steam generator were moved from the capacity column to the description column and listed as nominal. Table II-A was changed for auxiliary boiler S-5 noting that the heat input is based on a 3-hour average.

**SOLANO COUNTY**  
James Sperring

An error in the citations of the opacity limit and monitoring requirements for 40 CFR Part 60, Subpart Da, has been corrected in the final permit. The draft permit cited 40 CFR 60.44Da(b) as the opacity standard and 40 CFR 60.44Da(a)(3) as the monitoring requirements throughout the permit. The correct citations for the opacity standard are 40 CFR 60.42Da(b) and 60.49Da(a)(3) for the opacity monitoring requirements. This change is considered an administrative amendment to the permit (See Tables IV-A and VII-A for changes). The District has exempted the facility from opacity monitoring requirements contained in 40 CFR 60.49 Da(a)(3) as explained in the draft permit (See Table IV-A footnote 1, and Table VII-A footnote 2). The opacity standard in 40 CFR 60.42 Da(b) would still apply to the facility.

**SONOMA COUNTY**  
Susan Gorin  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

The draft permit listed 40 CFR Part 64, Compliance Assurance Monitoring, as an applicable requirement for the gas turbines and HRSGs. The gas turbines/HRSGs meet the exemption contained in 40 CFR 64.2(b)(vi). This exemption applies to sources with a Part 70 operating permit that specifies a continuous compliance determination method as specified in Part 64.1. The CO CEMs meet this definition. Accordingly, 40 CFR Part 64 has been removed from Table IV-A as an applicable requirement.

The draft permit did not include 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reciprocating Internal Combustion Engines. The final permit has been corrected to include Subpart ZZZZ as an applicable requirement. The NESHAP applies to S-6 diesel fire pump engine and S-7 natural gas fired emergency standby generator. The NESHAP has been added to Table IV-C and Table IV-D as an applicable requirement along with the applicable portions of 40 CFR Part 63 Subpart A, General Provisions.

An amended Statement of Basis has been prepared for the Los Medanos Title V permit that includes the 40 CFR, Part 60, Subpart Da, changes, removes 40 CFR Part 64 as an applicable requirement, and includes the 40 CFR Part 63, Subpart ZZZZ, and Subpart A changes. This document will be posted on the website with the final permit.

The District has decided to issue the renewal permit. The final permit and statement of basis 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 by Jeff McKay for Jack P. Broadbent  
Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

JPB:JC:DTJ