

Attachment A

Response to Calpine's Letter of April 19, 2012

Comment 1: Correct the averaging period in Table II-B for the NO_x, CO, and POC concentration limits in Condition 23688, part 19, from three hours to one hour.

Response: The District has made this correction.

Comment 2: The turbines are subject to NSPS, Subparts GG and Db, not Subpart KKKK.

Response: The applicant has withdrawn this comment.

Comment 3: 40 CFR 63.6640(a) has specific requirements that are not listed elsewhere in a permit condition and should be included in Table IV-A. These are:

- Change oil and filter every 500 hours of operation or annually, whichever comes first. Oil analysis program may be used to extend period.
- Inspect air cleaner every 1000 hours of operation or annually, whichever comes first.
- Inspect all hoses and belts every 500 hours or annually, whichever comes first, and replace as necessary.

Response: These requirements are listed under the citation for Section 63.6603(a). However, Section 63.6640(a) does refer to requirements in Table 6. The work or management practices requirement has been added to Table IV-A after the citation for Section 63.6670. The requirement is to operate and maintain the engine according to the manufacturer's emission-related operation and maintenance instructions.

Comment 4: 40 CFR 63.6640(b) infers that there are applicable reporting requirements, however, none exist.

Response: Section 63.6640(b) refers to Section 63.6650, "What reports must I submit and when?". Section 63.6650(a) states that any report required by Table 7 must be submitted. Table 7 has no reporting requirements for emergency engines. Nonetheless, Section 63.6640(b) states that "You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you." Since you have general reporting requirements in Paragraph 1.F and 1.G of this Title V permit, these reporting requirements will serve to comply with the requirement in Section 63.6640(b). A note has been added to the citation.

Comment 5: Per 40 CFR 63.6640(e), an existing emergency stationary RICE located at a major source of HAP emissions, is not subject to Table 8 of the regulation.

Response: Section 63.6665, "What parts of the General Provisions apply to me?", lists the engines that are not subject to the general requirements in Table 8. These engines are mostly engines over 500 hp at major sources of HAP. Your engine is a 300-hp engine at an area source of HAP. It appears that you are subject to Table 8. It has been added to Table IV-A.

Attachment A

Response to Calpine's Letter of April 19, 2012

Page 2

Comment 6: 40 CFR 63.6655(d) has specific requirements that are not listed elsewhere in a permit condition and should be included in the table. Revise the description of the requirement to include: "The owner/operator must keep records to show continuous compliance with the RICE operating limits of 100 hrs/yr (testing and maintenance) and 50 hrs/yr (non-emergency operations).

Response: The District has added the following language to the citation of Section 63.6655(d): "The owner/operator shall keep records of use for testing and maintenance and any use in non-emergency situations."

Comment 7: Correct the averaging period in Table VII-A for the NO_x, CO, and POC concentration limits in Condition 23688, part 19, from three hours to one hour.

Response: The District has made this correction.

Comment 8: The part 19 source test methods are incorrect.

Response: The source test methods have been corrected.

Attachment B

Additional Changes to the Permit after Proposal

1. The District contact on Page 1 has been updated. This is an administrative amendment to the permit.
2. A correction has been made to the citations of the mass emission limits in Condition 23688, parts 10, 19, 22, and 43 in Table VII-A to clarify that the limits apply to the heat recovery steam generators (HRSG) as well as the turbines. These are administrative amendments to the permit because Section VII is merely a summary of substantive requirements elsewhere in the permit.
3. The limit for sulfuric acid mist, omitted in error, in Condition 23688, part 23, has been added to Table VII-A. This is an administrative amendment to the permit because Section VII is merely a summary of substantive requirements elsewhere in the permit.
4. The dates in the tables for Sources S7, S8, S9, and S10, Heat Recovery Steam Boilers, in Section IX, Title IV Acid Rain Permit, have been corrected. These are administrative amendments to the permit.
5. The application numbers for the initial Title V application submitted in 2003 and the significant revision submitted in 2011 have been added to Section XI, Revision History. These are administrative amendments to the permit.