



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

July 22, 2011

Mr. Fernando Parra
Plant Manager
Goose Haven Energy Center, LLC
2425 Cordelia Road
Fairfield, CA 94534

Dear Mr. Parra:

This letter responds to the comments you submitted to the Bay Area Air Quality Management District (District) by letter dated June 13, 2011, regarding the District's proposed draft Title V Permit Renewal for the Goose Haven Energy Center (B4416).

Comment 1: Add Nominal 49.9 MW to S1 description on page 6 and delete 49.9 MW from capacity column.

Response to Comment 1: The District has made this change.

Comment 2: Condition 20 on page 34 need to be revised to be consistent with the shutdown definition on page 28.

Response to Comment 2: The District will revise the definition of a shutdown and the condition part 20 as follows.

Gas Turbine Shutdown Mode: The lesser of the 30 minute period immediately prior to the termination of fuel flow to the Gas Turbine or the period of time from non-compliance with any requirement listed in Part 18 until termination of fuel flow to the Gas Turbine.

Condition part 20:

20. Turbine Shutdown: Shutdown of the gas turbine shall not exceed a time period of 30 minutes. (Basis: Cumulative increase)

Comment 3: Condition 23(b) on page 35 should read "The ammonia injection system shall be equipped with an operational ammonia flowmeter accurate to plus or minus five percent at full scale and calibrated once every twelve months, and injection pressure indicator."

Response to Comment 3: The District will incorporate this change into the Title V permit.

ALAMEDA COUNTY

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(Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

CONTRA COSTA COUNTY

John Gioia
(Vice-Chair)
David Hudson
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Liz Kniss
Ken Yeager

SOLANO COUNTY

James Sperring

SONOMA COUNTY

Susan Gorin
Shirlee Zane

Comment 4: Word annual should change to periodic in VI Permit Conditions on page 36.

Response to Comment 4: The District has made this change to condition No. 20057 part 24.

Comment 5: In table VII-A in page 43, we like change the unit Limit for SO2 from 300 ppm (dry) to 1 grains/100 scf.

Response to Comment 5: The 300 ppm limit is based on a District Regulation 9, Rule 1, Section 302 and cannot be changed.

Comment 6: In section IX Title IV Acid Rain Permit Page 56, the effective start date should read the same as Title V start date.

Response to Comment 6: The District will make this change upon permit issuance.

The District has considered your comments and has decided to place the draft permit on public notice. The draft permit 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>. If you have any questions regarding this permit, please call Brenda Cabral, Supervising Air Quality Engineer, at (415) 749-4686.

Sincerely yours,

Signed by Jeff McKay for Jack P. Broadbent
Jack P. Broadbent,
Executive Officer/Air Pollution Control Officer

MRP:BKL

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