

Attachment A

Comments on proposed initial Title V permit for NRG Energy Center San Francisco LLC

Submitted by NRG on March 8, 2012

Plant B6151, Application 12220

July 31, 2012

Comment #1: The boilers should be grouped in the Title V permit based on how they fit Regulation 9, Rule 7. They are presently grouped by size and we suggest that they be grouped based on the section of rule they best fit.

Response to comment #1: We changed the grouping of the boilers so that they are grouped by their operating profiles because this determines the applicable requirements of Regulation 9, Rule 7. Accordingly, we have grouped S-3 and S-4 together since they are no longer load-following and will be abated by a single SCR system. S-5 and S-6 are grouped together since they both are "low-usage" units. S-7 has its own tables since it will be designated as load-following and S-8 has its own tables since it is relatively new and is subject to a NOx emission limit specified in a permit condition.

Comment #2: There are multiple references to 9-7-305 and 9-7-313 which are parts of the rule that have been deleted. We do not believe that 9-7-403, "Initial Demonstration of Compliance" applies since all sources at this facility have previously shown compliance.

Response to Comment #2: We have removed all citations of the 9-7-313 in the current version of the rule. This was included in error. However, the citations of these sections in the SIP version of the rule still apply and remain in the permit. 9-7-403 remains in the permit because it applies to any boiler that is subject to the final emission limits of 9-7-307, even those that have been source tested before.

Comment #3: We are interested in preserving the ability to use portable source testing equipment to conduct our required compliance testing. The proposed permit only allows the use of methods listed in the MOP. 9-7-606 allows the use of portable testing equipment as specified in EPA method CTM-030. Permit condition 22210, part 10 requires that all source test methods shall comply with the methods in the District MOP.

Response to Comment#3: We have modified permit condition 22210, part 10 so that it allows the usage of source test methods specified in Regulation 9, Rule 7, section 600 that lists EPA Method CTM-030.