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BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

NRG Energy Center San Francisco  
14 Mint Plaza, Suite 200  
San Francisco, CA 94103

March 8, 2012

Dennis Jang  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

RE: Comments to the Draft Title V Permit  
Facility #14759  
460 Jessie St, San Francisco, CA. 94103

Dear Dennis,

We appreciated the opportunity to meet with you on February 8, 2012, to discuss our compliance strategy and our concerns with the present Title V draft. In that meeting, it was agreed that we would provide the District with a written description of our concerns with the Title V draft permit.

Our first comment is that 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 the rule they best fit. We request the following groupings and regulatory considerations:

Boilers 3 and 4 are load following as defined under 9-7-307.4, and must therefore meet a NO<sub>x</sub> limit of 15 ppmv and CO limit of 400 ppmv. Please replace the citation 9-7-307.5 with 9-7-307.4. Boiler 3 and 4 are oil capable and must remain available in the event of a natural gas curtailment therefore 9-7-113 should be included in the Title V permit as an applicable requirement for these two boilers.

Boilers 5 and 6 are low usage and fall under 9-7-112.2. As such, both boilers must meet a NO<sub>x</sub> limit of 30 ppmv and CO limit of 400 ppmv. Boiler 5 and 6 are not subject to any part of 9-7-307. Boiler 5 is oil capable and must remain available in the event of a natural gas curtailment. Rule 9-7-113 should be included in the Title V permit as an applicable requirement.

Boiler 7 is the boiler used most and falls under the regulatory structure presented in the current draft of our Title V permit. Boiler 7 is oil capable and must remain available in the event of a natural gas curtailment. Rule 9-7-113 should be included in the Title V permit as an applicable requirement.

Boiler 8 is relatively new and falls under 9-7-117. This section of the rule provides a NO<sub>x</sub> limit of 9 ppmv.

There are also multiple references to 9-7-305 and 9-7-313 which are parts of the rule that have been deleted by the District in the later version of the rule. We also do not believe that 9-7-403, Initial Demonstration of Compliance, applies since all sources at this facility have previously shown compliance. These citations should not remain in the BAAQMD section of the permit however these references may be appropriate for the SIP version of the rule.

We are interested in preserving the ability to use portable source testing equipment to conduct our required compliance testing. The present draft Title V has gone through several iterations with the last allowing the use of EPA approved method CTM-030. We interpret the language of the current draft version of the Title V Permit to only allow the use of methods listed in the MOP. Rule 9-7-606 allows the use of CTM-030 but the caveat in the table confuses the situation. We would like this clarified and specifically included in the Title V Permit language by including a sentence in section VI.10 to the effect "CTM-030 is considered an acceptable alternative test method in lieu of the methods described in the MOP".

Sincerely,

A handwritten signature in cursive script, appearing to read "Ted Vincent". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Ted Vincent  
Plant Manager