## Errata for the

## **Oakley Generating Station Preliminary Determination of Compliance**

## November 4, 2010

Page 23: If it appears that the facility is nearing its annual limit, it will be required by law to reduce or curtail operations to ensure that emissions do not exceed the <u>permitting permitted</u> annual rates.

Page 31: Ammonia has the potential, under certain atmospheric conditions, to <u>reach-react</u> with nitric acid in the atmosphere to form ammonium nitrate...

Page 32: As explained above, these are the most effective combustion and <u>potpost</u>-combustion control technologies...

Page 35: Finally, assuming that an SCR system could be designed to achieve emissions below 2.0 by increasing the amount of catalyst or the size of the catalyst bed, the system would have to be able to operate to maintain compliance at all times, including during periods <u>of</u> transient load.

Page 36: Renewable sources of electrical power such as wind and solar are much more intermittent and uncertain that than traditional power plants.

Page 42: The District reviewed BACT determinations for POC at the EPA RACT/BACT/LAER Clearinghouse, ARB BACT Clearinghouse and recent projects listed by the CEC as approved or under<u>construction</u>.

Page 47: Good combustion practice for the proposed gas turbines at Oakley Generating Station<sup>39</sup> would include the use of GE's <u>DNLDLN</u>-2.6 combustion system...

Page 47: footnote 37. For example, if a baghouse were installed on the turbines, the turbine exhaust at the *inlet* to the baghouse would contain less PM than is normally seen in baghouse *output*, after abatement. PM emissions from a baghouse are normally in the range 0.0013 to 0.01 grains per standard cubic foot (*see BAAQMD BACT/TBACT Workbook*, Section 11: Miscellaneous Sources), whereas PM emissions from the proposed Oakley Generating Station turbines would be 0.000950.00081 gr/dscf (@ 15% O<sub>2</sub>).

Page 52: GE has worked with the National Fire Protection Agency to establish safe conditions (proposed in the 2010 Fall Revision Cycle to NFPA 85) without the delay in startup time that the purge cycle normally takes by moving the purge cycle to the end of the shutdown sequence.

Page 52: Based on discussions with GE, the District estimates that with this Rapid\_-Response system...

Page 68: footnote 63. See 40 C.F.R. § 52.21(b)(4)(6); *see also National Mining Ass'n v. EPA*, 50 F.3d 1351, 1365 (D.C. Cir. 1995).

Page 69: The proposed Oakley Generating Station would emit only 63.8863.78 tons per year of PM<sub>2.5</sub>...

Page 75: The auxiliary boiler shall comply with the Section 9-3-303 NO<sub>x</sub> limit of 125 ppm by using a boiler with manufacturer guaranteed emission rate complying with a permit condition NO<sub>x</sub> emissions limit of 7 ppmvd @ 3% O<sub>2</sub>.

Page 98: Condition Part 35c POC emissions (as CH<sub>4</sub>) at P-3 shall not exceed 2.8 pounds per day.

Page 102: Condition Part 49. Within 180 days of the issuance of the Authority to Construct for the OGS, the owner/operator shall contact the BAAQMD Technical Services Division regarding requirements for the continuous emission monitors, sampling ports, platforms, and source tests required by Parts 10, 25, 26, 28, 29, and 38, and 39. The owner/operator shall conduct all source testing and monitoring in accordance with the District approved procedures. (Basis: Regulation 1, Section 501)