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December 29, 2009

David Warner  
Director of Permit Services  
San Joaquin Valley Air Pollution Control District  
4800 Enterprise Way  
Modesto, CA 95356-8718

**DOCKET**

**09-AFC-2**

DATE DEC 29 2009

RECD. DEC 30 2009

Re: Comments on Preliminary Determination of Compliance  
Turlock Irrigation District, Almond 2 Power Plant (09-AFC-02)  
Project No. N-1091384

Dear Mr. Warner:

On behalf of Turlock Irrigation District (TID), we appreciate the opportunity to provide comments on the preliminary determination of compliance (PDOC) issued to TID's Almond 2 Power Plant (A2PP) project in Ceres, Stanislaus County. Our comments are discussed in detail below.

Page 1, Proposal: The fourth paragraph of this discussion states that "TID is expected to file applications to obtain...PSD permits from EPA Region 9 for this project." This is not correct. TID evaluated PSD applicability in the application for a determination of compliance/authority to construct and determined that the proposed project is not subject to PSD review (Section 5.1.7.1.1 of the AFC, pp. 5.1-52 through 54). A letter informing EPA of this determination was submitted to Region 9 on June 2, 2009; we made a formal request via email for concurrence with this determination on September 22, 2009. Please either remove this statement or revise it to indicate that TID has determined that the project is not required to obtain a PSD permit.

Page 3, Equipment Listing and Draft Permit Conditions (Appendix A): The heat input rating for each CTG is shown in the equipment description as 523.2 MMBtu/hr. As discussed later in the analysis, the maximum rated heat input under cold temperature conditions is 554.9 MMBtu/hr while 523.2 MMBtu/hr is the nominal rating at average ambient temperature (60EF). To ensure that the description does not inadvertently limit the allowable heat input to the CTGs, we suggest showing the heat input rating as the permitted maximum heat input of 554.9 MMBtu/hr. This correction should also be made to the equipment description that appears at the beginning of each set of draft PDOC conditions.

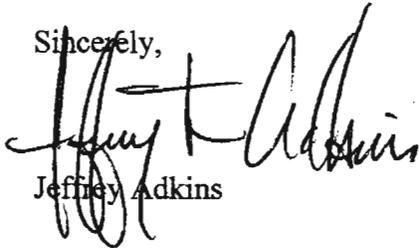
PROOF OF SERVICE (REVISED 12/10/09) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 12/30/09

TKG

Page 23 and Draft Condition 19 (Appendix A), Emissions During the Commissioning Period: The draft condition correctly reflects the commissioning period emissions proposed in the application. However, the application neglected to mention that because turbine startups will occur during the commissioning period, the maximum hourly emissions during the commissioning period should not be lower than the startup emission limits. This affects only the hourly CO limit: we request that this hourly limit be changed from 29.36 lb/hr to 40.00 lb/hr. This will not create any new worst case hourly impacts as the new maximum hourly CO commissioning emissions limit will be the same as the maximum hourly CO startup emissions limit that has already been evaluated in the PDOC.

Thank you for the opportunity to review and comment on the PDOC. If you have any questions regarding these comments, or wish to discuss them further, please do not hesitate to call Nancy Matthews or me.

Sincerely,



Jeffrey Adkins

cc: Rupi Gill, SJVAPCD  
Jagmeet Kahlon, SJVAPCD  
Gerardo Rios, EPA Region 9  
George Davies, TID  
Felicia Miller, CEC  
Sarah Madams, CH2M Hill  
Jeff Harris, Ellison Schneider and Harris  
Susan Strachan



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – [WWW.ENERGY.CA.GOV](http://WWW.ENERGY.CA.GOV)

**APPLICATION FOR CERTIFICATION  
FOR THE TID ALMOND 2  
POWER PLANT PROJECT**

**Docket No. 09-AFC-2**

**PROOF OF SERVICE  
(Revised 12/10/09)**

**APPLICANT**

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**INTERESTED AGENCIES**

California ISO  
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**INTERVENORS**

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DECLARATION OF SERVICE

I, Teraja Golston, declare that on December 30, 2009, I served and filed copies of the attached, Applicant's Comments on Preliminary Determination of Compliance, dated, December 29, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[\[http://www.energy.ca.gov/sitingcases/almond\]](http://www.energy.ca.gov/sitingcases/almond).

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

*(Check all that Apply)*

FOR SERVICE TO ALL OTHER PARTIES:

  X   sent electronically to all email addresses on the Proof of Service list;

  X   by personal delivery or by depositing in the United States mail at Sacramento with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

FOR FILING WITH THE ENERGY COMMISSION:

       sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (*preferred method*);

**OR**

       depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 09-AFC-2  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.

\_\_\_\_\_  
Teraja Golston