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November 5, 2010

Mr. Pierre Martinez
Siting Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

DOCKET	
09-AFC-4	
DATE	NOV 05 2010
RECD.	NOV 05 2010

Subject: Oakley Generating Station Project (09-AFC-4)
Errata Sheet for BAAQMD Application 20798, Preliminary Determination of
Compliance

Dear Mr. Martinez:

Attached please find three (3) hardcopies of the Errata sheet for Bay Area Air Quality
Management District Application 20798, Preliminary Determination of Compliance for the
Oakley Generating Station (09-AFC-4).

If you have any questions about this matter, please contact me at (916) 286-0278.

Sincerely,

CH2M HILL

A handwritten signature in blue ink, appearing to read "Douglas M. Davy".

Douglas M. Davy, Ph.D.
AFC Project Manager

cc: POS List
Project File



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November 4, 2010

Mr. Pierre Martinez, AICP
Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512

Re: Oakley Generating Station, Contra Costa County, CA
BAAQMD Application 20798

Dear Mr. Martinez:

The District sent a Preliminary Determination of Compliance for the proposed Oakley Generating Station with a letter dated October 29, 2010.

Enclosed is an Errata Sheet for the Preliminary Determination of Compliance for the proposed Oakley Generating Station.

Please submit any written comments on the intended action to the District by December 7, 2010.

If you have any questions regarding this matter, please contact Kathleen Truesdell, Air Quality Engineer II, at (415) 749-4628 (ktruesdell@baaqmd.gov).

Sincerely,

Brian Bateman
Director of Engineering Division

Enclosure
BB:kht



Spare the Air

The Air District is a Certified Green Business

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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 ~~permitting~~-permitted annual rates.

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

Page 32: As explained above, these are the most effective combustion and ~~post~~-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 of 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 construction.

Page 47: Good combustion practice for the proposed gas turbines at Oakley Generating Station³⁹ would include the use of GE's ~~DN~~-DLN-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~~0.00081 gr/dscf (@ 15% O₂).

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 ~~63.88~~63.78 tons per year of PM_{2.5}...

Page 75: The auxiliary boiler shall comply with the Section 9-3-303 NO_x limit of 125 ppm by using a boiler with manufacturer guaranteed emission rate~~complying with a permit condition~~
~~NO_x emissions limit~~ of 7 ppmvd @ 3% O₂.

Page 98: Condition Part 35c POC emissions (as CH₄) 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)



**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**

**APPLICATION FOR CERTIFICATION
FOR THE *OAKLEY GENERATING STATION***

**Docket No. 09-AFC-4
PROOF OF SERVICE
(Revised 8/13/2010)**

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DECLARATION OF SERVICE

I, Mary Finn, declare that on November 5, 2010, I served and filed copies of the attached Oakley Generating Station Project (09-AFC-4 Errata for BAAQMD Application 20798, Preliminary Determination of Compliance. 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:

[\[http://www.energy.ca.gov/sitingcases/contracosta/index.html\]](http://www.energy.ca.gov/sitingcases/contracosta/index.html). The document has 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:

- ☒ sent electronically to all email addresses on the Proof of Service list;
☐ by personal delivery;
☐ by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date 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 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-4
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.



Mary Finn