In the Matter of: ) Docket No. 01-AFC-18C
HENRIETTA PEAKER PROJECT ) Order No. 03-0723-08

Petition for Proposed Modifications: ) COMMISSION ORDER APPROVING
Reduce emission reduction credit ) PROJECT MODIFICATION
requirements and modify method of calculating emissions during startup and shutdowns

On February 5, 2003, GWF Energy, LLC submitted a request to amend the Commission Decision on its Henrietta Peaker Project. The request amends six air quality conditions of certification Air Quality (AQ): AQ-2, 17, 18, 19, 20, and 21.

At a regularly scheduled Business Meeting on July 23, 2003, the Commission considered staff’s analysis and approved the Petition and the proposed revised conditions in accordance with Title 20, section 1769(a)(3) of the California Code of Regulations.

COMMISSION FINDINGS

Based on staff’s analysis, the Energy Commission concludes that the proposed changes will not result in any significant impact to public health and safety, or the environment. The Energy Commission finds that:

There will be no new or additional unmitigated significant environmental impacts associated with the proposed changes.

The facility will remain in compliance with all applicable laws, ordinances, regulations, and standards, subject to the provisions of Public Resources code section 25525.

The change will decrease the total allowable particulate matter (PM10) emission rates based on compliance source testing and will decrease the total PM10 emission reduction credits required to offset the emission rates.

The change will also revise the startup/shutdown emission limits from a lb/hour basis to a lb/event reporting basis; and eliminate the limitation on the number of annual
startup/shutdown events. This will result in no change for any hourly, daily, or annual permitted emission limits for the power plant.

ORDER

The California Energy Commission hereby approves the Henrietta Peaker Project petition to Amend air quality Conditions of Certification AQ-2, AQ-17, AQ-18, AQ-19, AQ-20, and AQ-21, to allow for modification to the conditions as shown below:

REVISIONS TO EXISTING CONDITIONS OF CERTIFICATION

(Added text is underlined, deleted text is shown in strikethrough.)

The conditions of certification to be revised are shown below. Staff edits to condition AQ-18 include correcting the condition number referenced and defining the maximum number of hourly startup/shutdown events. (It should be noted that the District’s offset condition (AQ-2) shows the NO\textsubscript{x} offset requirement as the quantity of ERCs required at an offset ratio of 1.5:1 and shows the PM\textsubscript{10} offset requirement as the baseline offset quantity prior to the application of appropriate offset ratios.)

**AQ-2** Upon implementation of C-3929-1-0 and C-3929-2-0, emission offsets shall be provided to offset emissions increases in the following amounts: PM\textsubscript{10} - Q1: 8,500 700 lb, Q2: 8,500 700 lb, Q3: 8,500 700 lb, and Q4: 8,500 700 lb and NO\textsubscript{x} (as NO\textsubscript{2}) - Q1: 29,055 lb, Q2: 30,210 lb, Q3: 30,210 lb, and Q4: 29,055 lb. Offsets shall be provided at the appropriate offset ratio specified in Rule 2201. SO\textsubscript{x} offsets provided to offset PM\textsubscript{10} increases shall be at a ratio of 1.4:1 at the appropriate distance ratio. [District Rule 2201]

**Verification:** The project owner/operator shall submit copies of ERCs surrendered to the SJVAPCD in the amounts shown above to the CPM prior to initiation of project construction.

**AQ-17** During startup or shutdown of any gas turbine engine, combined emissions from the two gas turbine engines (C-3929-1 and C-3929-2) shall not exceed the following: NO\textsubscript{x} (as NO\textsubscript{2}) - 15.4 lb, CO - 15.4 lb, and VOC - 1.4 lb in any one hour per event. [California Environmental Quality Act]

**Verification:** The project owner/operator shall provide records of compliance as part of the quarterly reports of Condition AQ-31.

**AQ-18** A startup event is defined as the period beginning with turbine initial firing until the unit meets the lb/hr and ppmvd emission limits in Condition AQ-21. A shutdown event is defined as the period beginning with initiation of turbine shutdown sequence and ending with cessation of firing of the gas turbine engine. Startup and shutdown of gas turbine engine shall not exceed a time period of one hour per
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The number of startups and shutdowns shall not exceed 4 events per hour (i.e., two startup/shutdown cycles). [District Rule 2201]

Verification: The project owner/operator shall provide records of compliance as part of the quarterly reports of Condition AQ-31.

AQ-19 Emission rates from this unit, except during startup and shutdown events, shall not exceed any of the following: NO\textsubscript{x} (as NO\textsubscript{2}) – 6.21 lb/hr and 3.6 ppmvd @ 15% O\textsubscript{2}; VOC (as methane) – 1.17 lb/hr and 2.0 ppmvd @ 15% O\textsubscript{2}; CO – 6.25 lb/hr and 6.0 ppmvd @ 15% O\textsubscript{2}; PM\textsubscript{10} – 3.3 2 10 lb/hr; or SO\textsubscript{x} (as SO\textsubscript{2}) - 0.33 lb/hr. All emission concentration limits are three-hour rolling averages. [District Rules 2201, 4001, and 4703]

Verification: The project owner/operator shall provide records of compliance as part of the quarterly reports of Condition AQ-31.

AQ-20 Maximum daily emissions from this unit shall not exceed any of the following: NO\textsubscript{x} (as NO\textsubscript{2}) – 150.5 lb/day; VOC – 28.1 lb/day; CO – 151.5 lb/day; PM\textsubscript{10} – 79.2 48.0 lb/day; and SO\textsubscript{x} (as SO\textsubscript{2}) - 7.9 lb/day. [District Rule 2201]

Verification: The project owner/operator shall provide records of compliance as part of the quarterly reports of Condition AQ-31.

AQ-21 Maximum annual emissions from this unit, including startup and shutdown emissions, shall not exceed any of the following: NO\textsubscript{x} (as NO\textsubscript{2}) – 49,510 lb/year; VOC – 2,844 lb/year; CO – 21,830 lb/year; PM\textsubscript{10} – 26,400 16,000 lb/year; and SO\textsubscript{x} (as SO\textsubscript{2}) – 2,640 lb/year. [District Rule 2201]

Verification: The project owner/operator shall provide records of compliance as part of the quarterly reports of Condition AQ-31.

IT IS SO ORDERED.

STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND
DEVELOPMENT COMMISSION

23 July 2003
DATE

WILLIAM J. KEESE
Chairman