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January 10, 2006

WEC 2006-001

Lance Shaw
Compliance Project Manager
02-AFC-4C
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**RE: WALNUT ENERGY CENTER AUTHORITY WALNUT ENERGY
CENTER - CONDITIONS OF CERTIFICATION AQ-70 & 71**

Dear Mr. Shaw:

Conditions of Certification AQ-70 and AQ-71 for the Walnut Energy Center (WEC) provide emission limits for SOx and PM10 during project commissioning. We have identified transcription errors in the commissioning limits for these two pollutants in these Conditions. Specifically, in Condition AQ-71 it appears that the SOx and PM10 daily emission limits are reversed. Similarly, Condition AQ-70 also has a SOx hourly emission limit that is lower than the non-commissioning SOx hourly limit in Condition AQ-30, indicating an error. Please find attached hereto proposed conforming revisions to Conditions AQ-70 and 71 to correct these discrepancies.

Further, the attached letter from the Turlock Irrigation District to Jim Swaney of the San Joaquin Valley Air Pollution Control District (SJVAPCD) provides an explanation of the existing permit conditions and the proposed revisions. Please note that while the conditions are identical, the SJVAPCD Authority to Construct (ATC) condition numbers are different than the CEC air quality permit condition numbers. SJVAPCD ATC Condition 87 corresponds to CEC Condition 70 and SJVAPCD ATC Condition 88 corresponds to CEC Condition 71.


We believe that the Staff has the discretion to process these changes as an insignificant project change. There are no changes to the underlying air quality analyses or the conclusions reached in the Commission's Decision. If, however, Staff decides to process these changes as an amendment, this filing is consistent with the requirements of Section 1769 of the California Energy Commission regulations. Specifically, the information presented herein provides a complete description of the proposed modifications, including the new language for the affected Conditions AQ-70 and AQ-71 (SJVAPCD Conditions 87 and 88), as required by Section 1769(a)(1)(A). This filing also includes a discussion of the necessity of the proposed changes,

Lance Shaw
January 10, 2006
Page 2

per Section 1769(a)(1)(B). This filing is based on information that was not known during the time of the certification, and it does not undermine the assumptions, rationale, findings, or other bases for the final decision, per Sections 1769(a)(1)(C) and 1769(a)(1)(D). As discussed above, the revisions to the AQ-70 and AQ-71 condition language do not have the potential to create any significant impacts on the environment, and the project remains consistent with all applicable LORS, per Sections 1769(a)(1)(E) and 1769(a)(1)(F). The proposed revisions will not adversely affect the public, per Section 1769(a)(1)(G). In addition, the proposed revisions will have no adverse effects on nearby property owners, per Section 1769(a)(1)(H) and 1769(a)(1)(I).

Should you have questions, please do not hesitate to contact me at 916-447-2166.

Sincerely,

A handwritten signature in dark ink, reading "Jeffery D. Harris". The signature is fluid and cursive, with the first name "Jeffery" being more prominent and the last name "Harris" following in a similar style.

Jeffery D Harris
Attorneys for WECA

Attachments (2)
Revisions to Conditions
Letter to James Swaney

REVISIONS TO CONDITIONS AQ-70 & AQ-71

AQ-70 *The emission rates during the commission period shall not exceed any of the following:*
.... Sox – ~~0.94~~ 1.05 lb/hr,

AQ-71 *Combined emission rates from permit units N-7172-1 and N-7172-2, during the commissioning period, shall not exceed any of the following limits:*
.... Sox ~~336.0~~ 50.3 lb/day; PM10 – ~~47.8~~ 336.0 lb/day.

TURLOCK IRRIGATION DISTRICT
333 EAST CANAL DRIVE
POST OFFICE BOX 949
TURLOCK, CALIFORNIA 95381
(209) 883-8300

Don Pedro Dam and
Powerhouse

December 30, 2005

Mr. Jim Swaney
San Joaquin Valley APCD
4800 Enterprise Way
Modesto, CA 95356-8718

Subject: Correction of Erroneous ATC Commissioning Limits

Dear Mr. Swaney:

We have identified errors in the Authority to Construct ("ATC") commissioning emission limits for the Walnut Energy Center Authority's Walnut Energy Center ("WEC") located in Turlock, California. The SO_x and PM₁₀ daily emission limits in Condition 88 of ATCs N-7172-1-0 and N-7172-2-0 appear to be reversed, resulting in an unnecessarily restrictive limit on PM₁₀ emissions during commissioning activities. Also, Condition 87 has a SO_x hourly emission limit that is lower than the non-commissioning SO_x hourly limit in Condition 36.

Condition 88 limits SO_x emissions to 336.0 lb/day and PM₁₀ emissions to 47.8 lb/day during commissioning for both turbines combined. These limits are incorrect for several reasons. First, these daily limits are inconsistent with the hourly commissioning limits in Condition 87 of 0.94 lb/hr for SO_x and 7.0 lb/hr for PM₁₀. Based on these hourly limits and 24 hours of operation, the daily SO_x limit should be $0.94 \times 24 \times 2 \text{ turbines} = 45.1$ lb/day SO_x and $7.0 \times 24 \times 2 \text{ turbines} = 336.0$ lb/day PM₁₀. These are roughly the opposite of the Condition 88 limits (336.0 lb/day SO_x and 47.8 lb/day SO_x), indicating that there was probably a transcription error.

Second, the Condition 88 SO_x and PM₁₀ commissioning limits are lower than the daily non-commissioning (normal operation) limits in Condition 35 (168.0 lb/day PM₁₀ per turbine) and Condition 36 (25.2 lb/day SO_x per turbine). Condition 36 also limits non-commissioning SO_x emissions to 1.05 lb/hr, which is higher than the commissioning limit in Condition 87 of 0.94 lb/hr. Commissioning emission limits for SO_x and PM₁₀ should be the same as the normal turbine operating limits, because commissioning activities generally do not affect turbine SO_x and PM₁₀ emission rates.

Finally, we note that the maximum daily emission rates submitted in the permit application for the WEC project were 50.3 lb/day SO_x and 336.0 lb/day PM₁₀ for two turbines combined (see attached Table 8.1-18, page 8.1-38 of the November 21, 2002 permit application). The application also indicates that SO_x emissions will be 1.0 lb/hr (Table 8.1-18).



Therefore, we request that the SO_x and PM₁₀ emission limits in Conditions 87 and 88 be corrected to the accurate values reflected in other ATC conditions and the permit application as follows:

87. The emission rates during the commissioning period shall not exceed any of the following: . . . SO_x – ~~0.94~~ 1.05 lb/hr, . . .

88. . . . Combined emission rates from permit units N-7172-1 and N-7172-2, during the commissioning period, shall not exceed any of the following limits: . . . SO_x ~~336.0~~ 50.3 lb/day; PM₁₀ – ~~47.8~~ 336.0 lb/day.

We request that these permit corrections be processed in the most expeditious manner possible, because the WEC turbines are currently undergoing commissioning operations and could exceed the current incorrect SO_x and PM₁₀ limits on high firing days. We understand that we will be billed for any permit fees associated with this application.

Please contact myself, or Jeff Adkins of Sierra Research at (916) 444-6666 with any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. A. Davies IV", followed by a horizontal line.

George A. Davies IV



Cc: Susan Strachan
Jeff Adkins, Sierra Research
WEC Files

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

- ☐ AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit.
☒ AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/Valid ATC.
☐ AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct.
☐ PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate.

1. PERMIT TO BE ISSUED TO: Walnut Energy Center Authority	
2. MAILING ADDRESS: 600 South Washington Road STREET/P.O. BOX: _____ CITY: Turlock STATE: CA 9-DIGIT ZIP CODE: 95381	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 600 South Washington Road CITY: Turlock _____/4 SECTION _____ TOWNSHIP _____ RANGE _____	WITHIN 1,000 FT OF A SCHOOL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO S.I.C. CODE(S) OF FACILITY (If known): _____
4. GENERAL NATURE OF BUSINESS: Power Production and Water Supply	INSTALL DATE: 2005
5. TITLE V PERMIT HOLDERS Do you request a COC (EPA Review) prior to receiving your ATC? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO ONLY:	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary): Correction of commissioning permit limits for SOx and PM10 in Conditions 87 and 88 of ATCs N-7172-1-0 and N-7172-2-0 for consistency with Conditions 35, 36, and the values in the original November 21, 2002 permit application. Revised values should be as follows: SOx = 1.05 lb/hr, 50.3 lb/day PM10 = 336.0 lb/day	
7. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If yes, ATC/PTO #: N-7172-1,2	Optional Section 10 CHECK WHETHER YOU ARE A PARTICIPANT IN EITHER OF THESE VOLUNTARY PROGRAMS: "SPARE THE AIR" <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Send info "INSPECT" <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Send info  
8. IS THIS PROPERTY ZONED PROPERLY FOR THE PROPOSED USE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
9. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If yes, NOV/NTC #: _____	
11. TYPE OR PRINT NAME OF APPLICANT: George A. Davies IV	TITLE OF APPLICANT: Combustion Turbine Division Manager
12. SIGNATURE OF APPLICANT: _____ DATE: _____	PHONE #: (209) 883-3451 FAX #: (209) 656-2142 E-MAIL: gadavies@tid.org

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK #: _____
	DATE PAID: _____
	PROJECT #: _____ FACILITY ID: _____

Northern Regional Office * 4230 Kiernan Avenue, Suite 130 * Modesto, California 95356-9321 * (209) 557-6400 * FAX (209) 557-6475
Central Regional Office * 1990 East Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061
Southern Regional Office * 2700 M Street, Suite 275 * Bakersfield, California 93301-2370 * (661) 326-6900 * FAX (661) 326-6985

Rev: July 2000

- Each turbine operates at full load for 19 hours; and
- Fire pump is tested.

For SO₂ and PM₁₀:

- Each turbine operates at full load for 24 hours;
- Fire pump is tested; and
- Cooling tower operates at maximum output.

Maximum Annual Emissions:

For NO_x, CO, and VOC:

- Each turbine operates in startup or shutdown mode for 250 hours per year;
- Each turbine operates at full load for 8,510 hours; and
- Fire pump engine operates for 100 hours per year.

For SO₂ and PM₁₀:

- Each turbine operates at full load for 8,760 hours per year;
- Cooling tower operates at maximum output for 8,760 hours per year; and
- Fire pump engine operates for 100 hours per year.

Detailed emission calculations appear in Appendix 8.1A. Emissions from the cooling tower were calculated from the maximum cooling water TDS level.

TABLE 8.1-18
Emissions from New Equipment^a

	NO _x	SO ₂	CO	VOC	PM ₁₀
Maximum Hourly Emissions, lb/hr					
Turbines	126.6	2.1	138.3	17.8	14.0
Fire Pump Engine	3.4	0.1	0.2	0.1	0.1
Cooling Tower	-	-	-	-	1.3
Total Project, pounds per hour	130.0	2.2	138.4	17.9	15.4
Maximum Daily Emissions, lb/day					
Turbines	888.6	50.3	1,117.4	165.7	336.0
Fire Pump Engine	3.4	0.1	0.2	0.1	0.1
Cooling Tower	-	-	-	-	30.9
Total Project, pounds per day	892.0	50.4	1,117.6	165.8	366.9
Maximum Annual Emissions, tpy					
Turbines	90.8	8.7	106.5 ^c	18.8	61.3
Fire Pump Engine	0.2	<0.1	<0.1	<0.1	<0.1
Cooling Tower	-	-	-	-	5.6
Total Project, tons per year ^b	91.0	8.7	106.5 ^c	18.8	67.0

^a See Appendix 8.1A for detailed calculations.

^b Numbers may not add directly due to rounding.

^c Project CO emissions will be limited to less than 100 tons per year.