



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

June 22, 2009

DOCKET

08-AFC-7

DATE 6/22/2009

RECD. 8/19/2009

Dave Warner
Director of Permit Services
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

Re: EPA Comments on Project Number N-I083212
Facility Name: GWF Energy, LLC - Tracy (N-4597)

Dear Mr. Warner:

Thank you for the opportunity to comment on San Joaquin Valley Air Pollution Control District's (District) Preliminary Determination of Compliance (PDOC) for Project Number N1083212 at GWF Energy, LLC - Tracy (GWF Tracy) (N-4597). Over the past several weeks, our staff members have discussed ways to resolve the issues we raised in our comment letter dated May 21, 2009, for the proposed project. On June 22, 2009, we have received a copy of the District's draft Response to Comments and believe that the proposed changes and additional explanations provided will address all of the issues raised in our comment letter.

In particular, the District will explain in the FDOC that the District will debit their tracking system by the amounts necessary to provide federal VOC and PM10 offsets for this project rather than using a portion of the facility's NOx PTE to generate new PM10 and VOC credits.

Again, I thank you and your staff for the efforts in preparing this permit and for the time spent discussing it with us. If you have any questions or if you would like to discuss this matter further, please call me or have your staff call Andrew Chew at (415) 947-4197 or Laura Yannayon at (415) 972-3534.

Sincerely,

Gerardo C. Rios
Chief, Air Permits Office