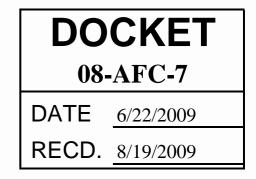


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street

San Francisco, CA 94105-3901

June 22, 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-1083212 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