

Environmental Law and Justice Clinic

September 2, 2009

SUBMITTED BY E-MAIL

Mr. Kenneth Celli
 Mr. Richard Ratliff
 California Energy Commission
 1516 Ninth Street, MS4
 Sacramento, CA 95814

Mr. Scott Galati
 Galati-Blek LLP
 445 Capital Mall, Ste. 350
 Sacramento, CA 95814

Reference: Gateway Generating Station (00-AFC-1C)

Subject: Complainants' Joint Supplemental Exhibit List

Dear Mr. Celli, Mr. Ratliff and Mr. Galati:

On behalf of the Complainants, we submit this Joint Supplemental Exhibit List for the Gateway Generating Station compliance proceeding.

COMPLAINANTS' JOINT SUPPLEMENTAL EXHIBIT LIST

EXHIBIT #	DOCUMENT	RELEVANCE
32	Email Correspondence Between Brian K. Lusher and Nancy L. Matthews re: Acid Rain and Prevention of Significant Deterioration Permits (May 7, 2009 and May 9, 2009)	GGs Compliance with LORS.
33	BAAQMD Breakdown Investigation and CEM Excess Investigation (January 2009)	GGs Compliance with LORS.
34	Email Correspondence Between Edward Giacometti and Jeffrey Gove re: Diesel Fire Pump (February 19, 2009)	GGs Compliance with LORS.
35	Email and Attachment from Brian K. Lusher to Nancy L. Matthews re: Emission Reduction Credits	GGs Compliance with LORS.

Complainants have previously reserved the right to amend the exhibit list as further documents become available. ACORN sent a public records request to BAAQMD on May 18, 2009 for documents related to this facility. ACORN was only recently able to complete review of those documents due to BAAQMD's delay in providing them. In addition, BAAQMD has informed us that some of the documents related to the

DOCKET	
00-AFC-1C	
DATE	9/2/2009
RECD.	9/2/2009

Mailing Address:
 536 Mission Street
 San Francisco, CA
 94105-2968

Offices:
 62 First Street
 Suite 240
 San Francisco, CA
 tel: (415) 442-6647
 fax: (415) 896-2450
 www.ggu.edu/law/eljc

NOV and ongoing enforcement issues remain confidential until the issues are resolved. Therefore, additional information related to the facility's operation may become available at a later date and we reserve the right to supplement based on this. Further, we reserve the right to supplement our exhibit list based on the additional documents that PG&E adds to its exhibit list. Finally, we note that we have not had an opportunity to conduct any discovery on PG&E in this proceeding so we only have had access to a subset of the information related to this facility.

Sincerely,

Deborah Behles

/s/ Deborah Behles

cc: CEC Docket Unit (via email and first class mail)
John Adams (via email)
Rory Cox (via email)
Rob Simpson (via email)
Bob Sarvey (via email)
Mike Boyd (via email)
Docket No. 00-AFC-1C, Proof of Service List

EXHIBIT 32

Brian Lusher

From: Brian Lusher
Sent: Friday, May 09, 2008 2:22 PM
To: 'Nancy L. Matthews'
Subject: RE: Gateway Condition 41 and 42

Nancy,

I will speak with legal about the 24 months issue. His previous position was that 24 months was to allow the agency time to process. As long as the applicant is not delaying issuance by withholding info or submitting incomplete paper work, then he thought the applicant had done everything possible. I do not think 24 months issue removes the application shield in Part 75. I will check and see if he can word 42 in a way that will work better for the facility.

I will work with legal on Monday.

Brian Lusher

-----Original Message-----

From: Nancy L. Matthews [mailto:NMatthews@sierraresearch.com]
Sent: Friday, May 09, 2008 2:15 PM
To: Brian Lusher
Cc: Nancy L. Matthews
Subject: RE: Gateway Condition 41 and 42

Brian, I am fine with your change to condition 41, but 42 still doesn't help us because we submitted the application in December 2006 and we will first fire in August 2008, so that's not 24 months. (Also GGS has only one turbine/HRSG but you've probably fixed that already).

Nancy

-----Original Message-----

From: Brian Lusher [mailto:blusher@baaqmd.gov]
Sent: Friday, May 09, 2008 1:31 PM
To: Nancy L. Matthews
Subject: Gateway Condition 41 and 42

Nancy,

Here is the text from Russell City for Condition 41 and 42. The wording fixes the problem with the Gateway language.

41 should be reworded since the TV is an initial not a revision.

42 should be reworded since it is more restrictive than Part 72.

41. Pursuant to BAAQMD Regulation 2, Rule 6, section 404.1, the owner/operator of the GGS shall submit an application to the BAAQMD for a major facility review permit within 12 months of completing construction as demonstrated by the first firing of any gas turbine or HRSG duct burner. (Regulation 2-6-404.1)

42. Pursuant to 40 CFR Part 72.30(b) (2) (ii) of the Federal Acid Rain Program, the owner/operator of the Gateway Generating Station shall submit an application for a Title IV operating permit to the BAAQMD at least 24 months before operation of any of the gas turbines (S-1, S-3, S-5, or S-7) or HRSGs (S-2, S-4, S-6, or S-8). (Regulation 2, Rule 7)

Based on my discussions with legal the 24 months issue is not a problem as long as it is clear that the application processing has not been delayed by the applicant not submitting required information.

Regards,

Brian Lusher

Brian Lusher

From: Brian Lusher
Sent: Friday, May 09, 2008 1:31 PM
To: Nancy L. Matthews (E-mail)
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42. Pursuant to 40 CFR Part 72.30(b)(2)(ii) of the Federal Acid Rain Program, the owner/operator of the Gateway Generating Station shall submit an application for a Title IV operating permit to the BAAQMD at least 24 months before operation of any of the gas turbines (S-1, S-3, S-5, or S-7) or HRSGs (S-2, S-4, S-6, or S-8). (Regulation 2, Rule 7)

Based on my discussions with legal the 24 months issue is not a problem as long as it is clear that the application processing has not been delayed by the applicant not submitting required information.

Regards,

Brian Lusher

Brian Lusher

From: Brian Lusher
Sent: Wednesday, May 07, 2008 5:29 PM
To: 'Nancy L. Matthews'
Subject: RE: Gateway Revised Condition Text in Word

Nancy,

The acid rain permit requires a draft permit and a 30 day comment period. My initial review indicates there is no effective date requirement like PSD which is effective 30 days after issuance.

I will review with legal to ensure I am reading the requirements correctly... The requirements are slightly different for States with delegated programs.

Most facilities do not have a TV issued by the District at the time of first fire. An application for a TV seems to be enough.

Regards,

Brian Lusher

-----Original Message-----

From: Nancy L. Matthews [mailto:NMatthews@sierraresearch.com]
Sent: Wednesday, May 07, 2008 4:42 PM
To: Brian Lusher
Cc: Nancy L. Matthews
Subject: RE: Gateway Revised Condition Text in Word

Brian, since the acid rain permit is part of the Title V permit, it may require noticing, and if it does, it's a 45-day notice for EPA review. This would cause real problems if the draft Title V/acid rain permit isn't issued before the end of May. Will you check on this to be sure?

Thanks--

Nancy

-----Original Message-----

From: Brian Lusher [mailto:blusher@baaqmd.gov]
Sent: Wednesday, May 07, 2008 4:37 PM
To: Nancy L. Matthews
Subject: RE: Gateway Revised Condition Text in Word

Nancy,

Still working on the engineering evaluation for the proposed amended AC, and draft PSD permit. Modeling is running now...

Hopefully, I can still get it all out to comment by mid May.

Once I get the draft engineering eval in for management review, then I will get the Acid Rain permit going. I do not believe the Acid Rain permit requires any noticing.

Have had a few distractions with other plants and those Monday meetings at City Hall regarding SPERP, but Gateway is the top priority.

Regards,

Brian K. Lusher
Air Quality Engineer II

Bay Area Air Quality Management District
415 749-4623

-----Original Message-----

From: Nancy L. Matthews [mailto:NMatthews@sierraresearch.com]
Sent: Wednesday, May 07, 2008 4:32 PM
To: Brian Lusher
Cc: Nancy L. Matthews; Gary Rubenstein
Subject: RE: Gateway Revised Condition Text in Word

Brian, here you go.

How is the amendment coming? PG&E is getting nervous about their acid rain permit; what can I tell them?

Thanks--

Nancy

-----Original Message-----

From: Brian Lusher [mailto:blusher@baaqmd.gov]
Sent: Wednesday, May 07, 2008 3:19 PM
To: Nancy L. Matthews
Subject: Gateway Revised Condition Text in Word

Nancy,

Could you please provide the revised condition text in word.

Thanks,

Brian K. Lusher
Air Quality Engineer II
Bay Area Air Quality Management District
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Sent: Wednesday, May 07, 2008 3:19 PM
To: Nancy L. Matthews
Subject: Gateway Revised Condition Text in Word

Nancy,

Could you please provide the revised condition text in word.

Thanks,

Brian K. Lusher
Air Quality Engineer II
Bay Area Air Quality Management District
415 749-4623

EXHIBIT 33

BREAKDOWN ID# 05K75

EPISODE ID# 05K76

BREAKDOWN EPISODE INVESTIGATION FORM

	Initials	Date
SUPV		
ENF		
TECH		
SUPV		

COMPLETE THIS BOX FOR ALL EPISODES

COMPANY: **Gateway Generating Station**

SITE # **B8143**

REPORTED BY: **Steve Royall**

TITLE: **Plant Manager**

START date: **01/17/09** Time: **0900** hr

REPORTED date: **01/20/09** Time: **1224** hr

CLEAR date: **01/20/09** Time: **0900** hr

REPORTED date: **01/20/09** Time: **1224** hr

BREAKDOWN

ABATEMENT DEVICE:

SOURCE DESCRIPTION: **Gas Turbine**

s# **S #41**

PROBLEM: **Failure of facility's DAHS system resulting in loss of corrected values**

COMPANY WRITTEN REPORT due: **02/20/09**

RECEIVED WITHIN 30 DAYS: YES NO

INSPECTOR REVIEWED REPORT ON: **07/24/08**

- RELIEF
- VARIANCE IN EFFECT – DOCKET #
- NOT APPLICABLE – *No violation documented (non-monitor only)*
- DENIAL – Inspector will either
- ♦ ATTACH MONITOR EXCESS PENDING TECHNICAL EVALUATION
 - ♦ COMPLETE THE FOLLOWING NOV DATA

REGULATION: RULE: SECTION:

REGULATION: RULE: SECTION:

FOR PERMIT CONDITION VIOLATIONS:

CONDITION NO. Subsection No.

NUMBER OF DAYS:

Inspector: **Edward Giacometti**

I# **806**

Date of Report: **11/17/08**

SITE # **B8143**

EPIISODE BREAKDOWN ID# **05K75**

EPIISODE ID# **05K76**

Inspector: **Edward Giacometti** # **806**

Date of Report: **11/17/08**

SUPERVISOR RECOMMENDATION

RELIEF

Supervisor must verify the inspector has reviewed the company's written report .

If no report is received, relief must be denied where excess emissions are confirmed

NOT APPLICABLE - No violation documented

NOT APPLICABLE - After Source Test evaluation - No violation was documented

DENIAL

If recommended for a reason other than lack of company written report, it must be verified that the inspector has reviewed the company's written report (see above).

Also, the applicable DENIAL CODE(S) must be checked:

N **NUISANCE**

I **INTENT OR NEGLIGENCE**

R **RECURRENT**

M **MAINTENANCE**

D **DEFINITION:**

A **ADMINISTRATIVE:**

Not unexpected

Late reporting of event

Not Equipment Failure

None or Late written company report

COMMENTS: _____

SUPERVISING INSPECTOR: _____ DATE: _____

SITE # **B8143**

EPISODE BREAKDOWN ID# **05K75**

EPISODE ID# **05K76**

Inspector: **Edward Giacometti** # **806**

Date of Report: **11/17/08**

I. INTRODUCTION:

On 01/20/09, Reporting Inspector Edward Giacometti (I-806) received Breakdown (Episode ID #05K75) and CEM Excess (Episode ID# 05K76) for GGS Generating Station (GGS), Site# B8143, in Antioch. GGS reported a NO_x excess at the gas turbine (S# 41) which failed to meet permit condition #18138 Part 20b (P/C) in violation of Regulation 2, Rule 1, Section 307.

II. OBSERVATIONS:

On 01/26/09, I-806 and Air Quality Inspector Michael Bostick (I-450) investigated the incident at site B8143. At the facility, I-806 and I-450 met with Mr. Steve Royall, Facility Manager, Mr. Ben Stanley, Operations Supervisor, Mr. Richard Flander, Senior Environmental Engineer, and Mr. Angel Espiritu, Senior Environmental Consultant. Mr. Stanley provided I-806 with a 01/21/09 e-mail correspondence between Mr. Stanley and Spectrum Systems, the CEM manufacturer (See CEM Excess #05K76 report for copy of e-mail correspondence). The e-mail discussed a pseudo bit which caused the facility's data acquisition software (DAHS) to lock in calibration mode. As a result, the CEM was unable to collect current NO_x value calculations. I-806 reviewed the NO_x records for S# 41 (See CEM Excess #05K76 report for copy of facility NO_x records) which shows corrected NO_x values of 0.000 ppm between 1012 and 1100 hrs.

Using the recorded O₂ values at S #41 between 1012 and 1100 hrs, the facility was able to calculate the average NO_x value for the 1-hour period beginning at 1000 hrs (See CEM Excess #05K76 report for copy of O₂ records). Data indicates a NO_x reading of 2.56 ppm on 01/17/09 between 1000 and 1100 hrs. I-806 reviewed the facility's P/Cs and found that P/C# 18138 Part 20b requires the following:

20.

(b) The nitrogen oxide emission concentration at emission points P-11 and P-12 each shall not exceed 2.5 ppmv, on a dry basis, corrected to 15% O₂, averaged over any 1-hour period. (BACT for NO_x)

The recorded NO_x value on 01/17/09 exceeded the facility's 2.5 ppm NO_x limit as required in the P/Cs. From 01/17/09 to 01/20/09, the GGS's DAHS system remained locked in calibration mode. To continue operation until the DAHS programming was corrected, GGS calculated NO_x values using the recorded NO_x (uncorrected) and O₂ values (See CEM Excess #05K76 report for copy of NO_x (uncorrected) and O₂ values). The uncorrected NO_x values were then corrected to 15% O₂ as stated in P/C 18138 part 20b.

III. STATEMENTS:

On 01/26/09, I-806 spoke with Mr. Stanley. Mr. Stanley stated there was a programming error on the facility's CEM equipment. Mr. Stanley said that the monitoring equipment simply would lock into

SITE # **B8143**

EPISODE BREAKDOWN ID# **05K75**

EPISODE ID# **05K76**

Inspector: **Edward Giacometti** # **806**

Date of Report: **11/17/08**

calibration mode and was unable to collect current NO_x values. Mr. Stanley said that the programming technician from the CEM manufacturer informed him that there was a pseudo bit which the DAHS program was looking for during calibration which caused the system to lock in calibration mode. Mr. Stanley explained to I-806 that the system thought that it was still in calibration mode and never reverted back to real-time monitoring. Mr. Stanley told I-806 that the facility continued to operate following the discovery of the programming problem. To ensure the facility was not exceeding the 2.5 ppm NO_x limit stated in their P/C, Mr. Stanley said the NO_x values from 01/17/09 to 01/20/09 were calculated using the recorded O₂ and uncorrected NO_x values corrected to 15 percent O₂.

At the conclusion of the discussion, Mr. Stanley informed I-806 that the program technicians remedied the error on 01/20/09. In addition, Mr. Stanley told I-806 that the facility is attempting to modify its contract with monitoring system manufacturer to ensure a more rapid response to any future programming or equipment issues.

IV. CONCLUSION:

GGs encountered a programming error within the CEM at S# 41 which was reported to the District on 01/20/09 as a Breakdown #05K75. The programming error resulted in the system being locked in calibration mode and no real-time NO_x data was collected. Using NO_x data calculated from the recorded O₂ data, GGS observed an indicated CEM monitor excess for S# 41 when levels from gas turbine exceeded NO_x permit condition limitations pursuant to P/C #18138 part 20b in violation of Regulation 2, Rule 1, Section 307.

V. RECOMMENDATION:

The District's Technical Services Division determined no excess occurred during the episode reported by GGS on January 17, 2008. Therefore, no breakdown relief is necessary.

EPISODE - EXCESS ID# 05K76

ASSOCIATED EPISODE BREAKDOWN ID# 05K75

UNREPORTED EPISODE

CEM EXCESS EPISODE INVESTIGATION FORM

	Initials	Date
SUPV		
TECH		
ENF		
SUPV (Rec'd)		

COMPLETE THIS BOX FOR ALL EPISODES, THEN COMPLETE APPROPRIATE BOX(ES) FOR TYPE(S)

COMPANY: **Gateway Generating Station**

SITE # **B8143**

REPORTED BY: **Steve Royall**

TITLE: **Plant Manager**

START date: **01/17/09**

Time: **0900** hr

REPORTED date: **01/20/09**

Time: **1224** hr

CLEAR date: **01/20/09**

Time: **0900** hr

REPORTED date: **01/20/09**

Time: **1224** hr

MONITOR

CEM (MUST BE DISTRICT APPROVED MONITOR)

MONITOR NAME: **NOx CEM (Thermo Electron Model 421-LS)**

SOURCE DESCRIPTION: **Gas Turbine**

s# **41**

INDICATED VIOLATION

EXCESS: **2.56 ppm (2.5 ppm NOx limit)**

Meets Regulation 1-522.7?

(reported within 96 hrs after the occurrence)

Yes No

MONITORS/RECORDING DEVICES:

Meets Regulation 1-522.5? (Calibrated)

(monitors calibrated daily except for velocity sensing instruments which are calibrated monthly)

Yes No

Meets Regulation 1-522.9?

(records kept for 2 years and include dates of occurrence and duration of any startup, shutdown or malfunction, tests, calibrations, adjustments, maintenance, and emission measurements)

Yes No

DETAILS: NOx excess of 2.56 ppm due to failure of facility's DAHS system resulting in a loss of corrected NOx values. NOx limit is 2.5 ppm over averaged 1-hour period.

FOR REGULATION/RULE VIOLATION:

REGULATION: **2**

RULE: **1**

SECTION: **307**

FOR PERMIT CONDITION VIOLATION:

CONDITION NO. **18138**

Subsection No. **20b**

NUMBER OF DAYS: **1**

Inspector: **Edward Giacometti**

I# **806**

Date of Report: **01/29/09**

FINAL RECOMMENDATION: NFA NOV

Misread Interference (MIS)

Inspector: _____ I# _____ Date: _____

Supv: _____ D# _____ Date: _____

SITE # **B8143**
EPISODE - EXCESS ID# **05K76**
ASSOC. EPISODE BREAKDOWN ID# **05K75**
Inspector: **Edward Giacometti** # **806**
Date of Report: **01/29/09**

I. INTRODUCTION:

On 01/20/09, Reporting Inspector Edward Giacometti (I-806) received Breakdown (Episode ID #05K75) and CEM Excess (Episode ID# 05K76) for GGS Generating Station (GGS), Site# B8143, in Antioch. GGS reported a NO_x excess at the gas turbine (S# 41) which failed to meet permit condition #18138 Part 20b (P/C) in violation of Regulation 2, Rule 1, Section 307.

II. OBSERVATIONS:

On 01/26/09, I-806 and Air Quality Inspector Michael Bostick (I-450) investigated the incident at site B8143. At the facility, I-806 and I-450 met with Mr. Steve Royall, Facility Manager, Mr. Ben Stanley, Operations Supervisor, Mr. Richard Flander, Senior Environmental Engineer, and Mr. Angel Espiritu, Senior Environmental Consultant. Mr. Stanley provided I-806 with a 01/21/09 e-mail correspondence between Mr. Stanley and Spectrum Systems, the CEM manufacturer (Attachment 1). The e-mail discussed a pseudo bit which caused the facility's data acquisition software (DAHS) to lock in calibration mode. As a result, the CEM was unable to collect current NO_x value calculations. I-806 reviewed the NO_x records for S# 41 (Attachment 2) which shows corrected NO_x values of 0.000 ppm between 1012 and 1100 hrs.

Using the recorded O₂ values at S #41 between 1012 and 1100 hrs, the facility was able to calculate the average NO_x value for the 1-hour period beginning at 1000 hrs (Attachment 3). Data indicates a NO_x reading of 2.56 ppm on 01/17/09 between 1000 and 1100 hrs. I-806 reviewed the facility's P/Cs and found that P/C# 18138 Part 20b requires the following:

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III. STATEMENTS:

On 01/26/09, I-806 spoke with Mr. Stanley. Mr. Stanley stated there was a programming error on the facility's CEM equipment. Mr. Stanley said that the monitoring equipment simply would lock into calibration mode and was unable to collect current NO_x values. Mr. Stanley said that the programming technician from the CEM manufacturer informed him that there was a pseudo bit which the DAHS program was looking for during calibration which caused the system to lock in calibration mode. Mr. Stanley explained to I-806 that the system thought that it was still in calibration mode and

SITE # **B8143**
EPISODE - EXCESS ID# **05K76**
ASSOC. EPISODE BREAKDOWN ID# **05K75**

Inspector: **Edward Giacometti** I# **806**

Date of Report: **01/29/09**

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IV. CONCLUSION:

GGs encountered a programming error within the CEM at S# 41 which was reported to the District on 01/20/09 as a Breakdown #05K75. The programming error resulted in the system being locked in calibration mode and no real-time NO_x data was collected. Using NO_x data calculated from the recorded O₂ data, GGS observed an indicated CEM monitor excess for S# 41 when levels from gas turbine exceeded NO_x permit condition limitations pursuant to P/C #18138 part 20b in violation of Regulation 2, Rule 1, Section 307.

V. RECOMMENDATION:

I-806 recommends that this episode, 05K76, be reviewed by the District's Technical Services Division to determine if GGS exceeded the NO_x limitation stated in District P/C #18138 part 20b.

EXHIBIT 34

Jeffrey Gove

From: Edward Giacometti
Sent: Thursday, February 19, 2009 5:21 PM
To: Jeffrey Gove
Cc: Brian Lusher; Wayne Kino
Subject: Re: Gateway

10-4 Thanks Jeff.

From: Jeffrey Gove
To: Edward Giacometti
Cc: Brian Lusher; Wayne Kino
Sent: Thu Feb 19 16:51:17 2009
Subject: RE: Gateway

Ed,
I just spoke with Brian L. Here is the scoop as I understand. PG&E filed an application (#17182) on 1/7/08, which included the fire pump. On February 13th 2009 PG&E withdrew the application. The District never issued an A/C for this application but the fire pump was installed. PG&E at some point in time brought in a PERP to take the place of the permanent fire pump (has the PERP been on site longer than 12 months?). Brian said that the fire pump has never operated but is in place. Brian informed me that PG&E is going to submit a new application for the fire pump this coming March. Therefore it appears that the District will cite them for no A/C 2-1-301. If anyone has anything to add to this please let me know.
Jeff

From: Edward Giacometti
Sent: Thursday, February 19, 2009 4:30 PM
To: Jeffrey Gove
Subject: Re: Gateway

Ok! Thanks Jeff. I will touch base with you on Tuesday.

From: Jeffrey Gove
To: Edward Giacometti
Sent: Thu Feb 19 16:26:08 2009
Subject: Re: Gateway

Maybe I will go with you next week if its a Tuesday.

From: Edward Giacometti
To: Jeffrey Gove
Cc: Brian Lusher; Wayne Kino
Sent: Thu Feb 19 16:22:20 2009
Subject: Re: Gateway

Jeff,
Thanks for the update. I will let you know if I have any additional questions.

6/1/2009

-Ed

From: Jeffrey Gove
To: Edward Giacometti
Cc: Brian Lusher; Wayne Klno
Sent: Thu Feb 19 16:17:24 2009
Subject: Gateway

Ed,

I spoke with Wayne and it has been decided that an NOV will be issued from the date that the application was denied or when the fire pump was first installed to the date of the subsequent permit application. However, if the fire pump was removed before the second application then you could use the date in which it was removed from the site. You should also document any usage (hours of operation) of the fire pump for any reason per Reg 9-8. How many hours are on the hour meter? Let me know if you have any questions or need further assistance.

Jeff

EXHIBIT 35

Brian Lusher

From: Brian Lusher
Sent: Monday, August 10, 2009 4:43 PM
To: Nancy L. Matthews (E-mail)
Subject: FW: Attached Image

Nancy,

Here is the print out from our computer system regarding banking. Along with all of the information from Application No. 1000 regarding ERCs for the project.

Regards,

Brian K Lusher
Senior Air Quality Engineer
Bay Area Air Quality Management District
(415) 749-4623, Fax (415) 749-5030

-----Original Message-----

From: canan7095@baaqmd.internal [mailto:canan7095@baaqmd.internal]
Sent: Monday, August 10, 2009 4:25 PM
To: Brian Lusher
Subject: Attached Image



2113_001.pdf

Date: 10Aug09
 Application: 1000 << archived application record >>
 Plant #: 18143 << POC= .0 ,NOx= .0tons/yr>>
 Plant name: Gateway Generating Station
 Location: 3225 Wilbur Avenue, Antioch, CA 94509
 UTM coordinates: 609.01(Lon) 4207.9(Lat)
 Banking #: 795
 Project title: New Source/Gas Turbine
 Plant Contact: Steve Royall, Plant Manager
 Mailing address: 3225 Wilbur Avenue, Antioch, CA 94509
 Telephone: (925) 522-7805
 Engineer: Brian K Lusher [1015]
 Folder : Brian K Lusher
 Received: 03/08/00 . . . Completeness review due by: 03/27/00
 Incomplete: 03/13/00 Cancellation due by: 07/15/00
 Re-activated: 04/18/00 . . . Completeness review due by: 05/10/00
 Complete: 05/22/00 Evaluation due by: 11/18/00
 A/C: 07/24/01 Expiration due by: 07/23/09

Final disposition: A/C granted 07/24/01

 Emissions increase/decrease, (tons/year)

	PM>10	POC	NOx	SO2	CO	PM10
increase	.000	46.600	174.300	.000	.000	114.570
bank no. 693	.000	53.600	200.500	.000	.000	.000
offset ratio	.00	1.15	1.15	.00	.00	.00
bank no. 693	.000	.000	.000	.000	.000	321.900
offset ratio	.00	.00	.00	.00	.00	3.00
bank no. 694	.000	.000	.000	.000	.000	14.251
offset ratio	.00	.00	.00	.00	.00	3.00
bank no. 695	.000	.000	.000	.000	.000	.179
offset ratio	.00	.00	.00	.00	.00	3.00
bank no. 754	.000	.000	.000	.000	.000	2.370
offset ratio	.00	.00	.00	.00	.00	1.00

Source: S-41; Natural Gas-fired Combustion Turbine Generator <f>
 Codes: New/None
 Condition #: 18138 <<f>>
 Final Disposition: A/C granted, 07/24/01

Source: S-42; Heat Recovery Steam Generator (Duct Burner) <f>
 Codes: New/None
 Condition #: 18138 <<f>>
 Final Disposition: A/C granted, 07/24/01

Source: S-43; Natural Gas-fired Combustion Turbine Generator <f>
 Codes: New/None
 Condition #: 18138 <<f>>
 Final Disposition: A/C granted, 07/24/01

Source: S-44; Heat Recovery Steam Generator (Duct Burner) <f>
 Codes: New/None
 Condition #: 18138 <<f>>

Final Disposition: A/C granted, 07/24/01

Source: S-45; Natural Gas-Fired Fuel Preheater <f>

Codes: New/None

Condition #: 18138 <<f>>

Final Disposition: A/C granted, 07/24/01

Source: S-46; 10-Cell Cooling Tower <f>

Codes: New/None

Condition #: 18138 <<f>>

Final Disposition: A/C granted, 07/24/01

Abatement Device: A-14; CO Oxidizing Catalyst <f>

Codes: New/None

Final Disposition: A/C granted, 07/24/01

Abatement Device: A-13; Selective Catalytic Reduction with Ammonia Injectio

Codes: New/None

Condition #: 18138 <<f>>

Final Disposition: A/C granted, 07/24/01

Abatement Device: A-12; CO oxidizing catalyst <f>

Codes: New/None

Final Disposition: A/C granted, 07/24/01

Abatement Device: A-11; Selective Catalytic Reduction with ammonia injectio

Codes: New/None

Condition #: 18138 <<f>>

Final Disposition: A/C granted, 07/24/01

DECLARATION OF SERVICE

I, Lucas Williams, declare that on September 2, 2009, I served and filed copies of the attached COMPLAINANTS' JOINT SUPPLEMENTAL EXHIBIT LIST. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list. The document has been sent to 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:

For service on all other parties: sent electronically to all email addresses on the Proof of Service List;

AND

For filing with the Energy Commission: sent an original paper copy and one electronic copy, mailed and emailed respectively, to the addresses below:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 00-AFC-1C
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.

/s/ Lucas Williams



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

IN THE MATTER OF THE COMPLAINT AGAINST
GATEWAY GENERATING STATION

Docket No. 00-AFC-1C
PROOF OF SERVICE
(Revised 7/28/09)

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