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October 1, 2009

File No. 030137-0024

### VIA FEDEX

CALIFORNIA ENERGY COMMISSION  
Attn: Docket No. 08-AFC-11  
1516 Ninth Street, MS-4  
Sacramento, California 95814-5512

**DOCKET**

**08-AFC-11**

DATE OCT 01 2009

RECD OCT 01 2009

Re: CPV Vaca Station Power Plant Project: Docket No. 08-AFC-11

Dear Sir/Madam:

Pursuant to California Code of Regulations, title 20, sections 1209, 1209.5, and 1210, enclosed herewith for filing please find a copy of a letter to the Yolo-Solano Air Quality Management District regarding Applicant's Revised Emissions Offset Plan.

Please note that the enclosed submittal was filed today via electronic mail to your attention and served on all parties to the above-referenced project.

Very truly yours,



Paul E. Kilfm  
Senior Paralegal

Enclosure

cc: 08-AFC-11 Proof of Service List (w/encl., via e-mail and U.S. Mail)  
Michael J. Carroll, Esq. (w/encl.)  
Marc T. Campopiano, Esq. (w/encl.)

October 1, 2009



**sierra  
research**

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Susan McLaughlin  
Yolo-Solano Air Pollution Control District  
1947 Galileo Ct., Suite 103  
Davis, CA 95618

Dear Ms McLaughlin:

A revised offset plan for the CPV Vaca Station project is attached.

Because NOx offsets are in short supply in the District, the previous plan relied on the use of VOC offsets in lieu of NOx offsets in order to meet the District's offset requirements. EPA and the District have both requested additional information in support of our proposed interpollutant offset ratio.

The applicant has reviewed the operating and emission scenarios that form the basis for its requested quarterly emission limits, and has decided to reduce the requested allowances for Q2 and Q3, as well as the annual total. As a result, interpollutant offsets are no longer required for the offset plan. The attached plan presents the revised emissions and proposed offsets. We hereby amend the applications to the District, the CEC, and EPA to limit project emissions to the levels contained in the revised plan.

We believe that this is the last piece of information that has been requested by the District in order to complete its preparation of the PDOC.

Please contact me if you have additional questions.

Very truly yours,

Steve Hill

Attachment

cc: Rod Jones, CEC  
Gerardo Rios, USEPA Region 9  
Katherine Hoag, EPA Region 9  
Andrew Welch, CPV  
Mike Carroll, Latham & Watkins

Table 1. Project Emissions (Rev. 10/01/09)

Emission Units	Pollutant	Emissions				
		Q1	Q2	Q3	Q4	Total
Turbines & HRSGS	NOx	78,596	66,576	80,201	77,297	302,670
	SOx	7,132	6,900	7,277	7,000	28,309
	CO	100,320	85,855	102,420	99,769	388,365
	ROC	26,119	25,270	26,650	25,636	103,675
	PM10	35,700	34,410	36,420	34,920	141,450
Aux boiler	NOx	360	364	368	368	1,459
	SOx	13	13	14	14	54
	CO	1,219	1,232	1,246	1,246	4,943
	ROC	140	141	143	143	567
	PM10	250	253	255	255	1,013
Cooling Tower	NOx					0
	SOx					0
	CO					0
	ROC					0
	PM10	6,898	6,975	7,052	7,052	27,977
Emergency Engine	NOx	199	199	199	199	797
	SOx	0	0	0	0	1
	CO	2	2	2	2	10
	ROC	0	0	0	0	2
	PM10	1	1	1	1	4
Fire Pump	NOx	34	34	34	34	135
	SOx	0	0	0	0	0
	CO	4	4	4	4	16
	ROC	1	1	1	1	2
	PM10	1	1	1	1	2
TOTAL	NOx	79,189	67,173	80,801	77,897	305,060
	SOx	7,145	6,914	7,291	7,014	28,364
	CO	101,546	87,094	103,672	101,021	393,333
	ROC	26,260	25,412	26,794	25,780	104,245
	PM10	42,850	41,639	43,729	42,229	170,446

TPY	NOx	39.59	33.59	40.40	38.95	152.53
	SOx	3.57	3.46	3.65	3.51	14.18
	CO	50.77	43.55	51.84	50.51	196.67
	ROC	13.13	12.71	13.40	12.89	52.12
	PM10	21.42	20.82	21.86	21.11	85.22

Table 2. (Rev. 10/01/09)

CPVVS Offset Plan (NOx)

Credit Holder	Source of credits	Cert. No	Reduction Site	Distance (miles)	Dist. Ratio	Adjusted for Distance										
						Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	
Adams Group	Rice burn	EC-0189	Cty Rd 7 & Cty Road 95B	37	1.5	5,225.0	4,852.0	1,493.0	7,092.0	18,662.0	3,483.3	3,234.7	995.3	4,728.0	12,441.3	
Adams Group	Rice burn	EC-0191	Dunnigan	37	1.5	11,248.0	10,160.0	2,540.0	12,337.0	36,285.0	7,498.7	6,773.3	1,693.3	8,224.7	24,190.0	
Beltrami Trust	Rice burn	EC-108	County Rd 36 & Cty Rd 106	16	1.5	2,842.0		1,277.0		4,119.0	1,894.7	0.0	851.3	0.0	2,746.0	
Conaway	Rice burn	Pending (note)	Woodland	25	1.5	16,380.0	15,210.0	4,680.0	22,230.0	58,500.0	10,920.0	10,140.0	3,120.0	14,820.0	39,000.0	
Coppell & Ireland	Rice burn	EC-0114	Cty Rd 35 & Cty Rd 104	16	1.5	1,179.0		530.0		1,709.0	786.0	0.0	353.3	0.0	1,139.3	
Jack Wallace	Rice burn	EC-0110	Woodland	24	1.5	9,007.0	8,364.0	2,574.0	12,224.0	32,169.0	6,004.7	5,576.0	1,716.0	8,149.3	21,446.0	
Reclamation District	Rice burn	EC-0235 (note)	Reclamation District 108	37	1.5	21,874.0	20,312.0	6,250.0	29,687.0	78,123.0	14,582.7	13,541.3	4,166.7	19,791.3	52,082.0	
River Garden Farms	Rice burn	EC-0273 (note)	River Garden Farms	35	1.5	22,776.0	21,149.0	6,507.0	30,910.0	81,342.0	15,184.0	14,099.3	4,338.0	20,606.7	54,228.0	
Wallace Construction	Rice burn	EC-0112	CR 16 & CR 116	31	1.5	2,862.0	1,695.0	1,207.0	2,058.0	7,822.0	1,908.0	1,130.0	804.7	1,372.0	5,214.7	
<b>Rice Burn Adjustment</b>					1.5	(5,161.0)	0.0	(1,848.9)	0.0		(3,440.7)	0.0	(1,232.6)	0.0	(4,673.2)	
Jopson Ranch		98001-00R	S. Sutter County		1.5	2,789.0	2,360.0	12,106.0	1,502.0	18,757.0	1,859.3	1,573.3	8,070.7	1,001.3	12,504.7	
Proctor & Gamble		00837	Sacramento County		1.5			9,380.0		9,380.0	0.0	0.0	6,253.3	0.0	6,253.3	
State of California GS		00635	Sacramento County		1.5			1,336.0		1,336.0	0.0	0.0	890.7	0.0	890.7	
Blue Diamond Growers		00996	Sacramento County		1.5	10,147.0	1,500.0	1,500.0	975.0	14,122.0	6,764.7	1,000.0	1,000.0	650.0	9,414.7	
Element Markets		01050	Sacramento County		1.5			1,023.9		1,023.9	0.0	0.0	682.6	0.0	682.6	
Element Markets		01046	Sacramento County		1.5	4,550.0	4,550.0	4,550.0	4,550.0	18,200.0	3,033.3	3,033.3	3,033.3	3,033.3	12,133.3	
Granite Construction		00995	Sacramento County		1.5		6,771.0	6,931.0	4,000.0	17,702.0	0.0	4,514.0	4,620.7	2,666.7	11,801.3	
Lauppe, Daryl	Agricultural Burning	20002-PB-01R	S. Sutter County		1.5	2,317.5	1,499.5	409.0	2,590.0	6,816.0	1,545.0	999.7	272.7	1,726.7	4,544.0	
Lauppe, Daryl	Agricultural Burning	20009-01R	S. Sutter County		1.5	0.0	1,141.5	1,188.0	0.0	2,329.5	0.0	761.0	792.0	0.0	1,553.0	
Lauppe, Daryl	Agricultural Burning	20002-01R	S. Sutter County		1.5	1,835.5	1,187.5	324.0	2,051.5	5,398.5	1,223.7	791.7	216.0	1,367.7	3,599.0	
Adams Schwab and Adams		EC-0042	Woodland	24	1.5	237.0	232.0	233.0	321.0	1,023.0	158.0	154.7	155.3	214.0	682.0	
City of Roseville		EC-0251	Clarksburg	22	1.5		10,620.0		4,414.0	15,034.0	0.0	7,080.0	0.0	2,942.7	10,022.7	
City of Roseville		EC-0252	Clarksburg	22	1.5		5,137.0		2,746.0	7,883.0	0.0	3,424.7	0.0	1,830.7	5,253.3	
Hunt Wesson Foods		EC-0028	Davis	17	1.5			1,789.0		1,789.0	0.0	0.0	1,192.7	0.0	1,192.7	
Pacific Coast Producers		EC 0206	Davis	17	1.5			251.0		251.0	0.0	0.0	167.3	0.0	167.3	
Pacific International Rice Mills		EC-0223	Woodland	24	1.5			609.0	1,088.0	1,697.0	0.0	0.0	406.0	725.3	1,131.3	
Teichert Aggregates		EC-0240	Esparto	25	1.5	512.0	594.0	356.0	488.0	1,950.0	341.3	396.0	237.3	325.3	1,300.0	
UC Davis		EC-0198	Vacaville	6	1.3			1,587.0		1,587.0	0.0	0.0	1,220.8	0.0	1,220.8	
UC Davis		EC-0199	Vacaville	6	1.3			1,388.0		1,388.0	0.0	0.0	1,067.7	0.0	1,067.7	
UC Davis		EC-0200	Vacaville	6	1.3			1,289.0		1,289.0	0.0	0.0	991.5	0.0	991.5	
UC Davis		EC-0263	Clarksburg	22	1.5		6,000.0			6,000.0	0.0	4,000.0	0.0	4,000.0		
UC Davis		EC-0297	Woodland	24	1.5		1,008.0	388.0	851.0	2,247.0	0.0	672.0	258.7	567.3	1,498.0	
UC Davis		EC-0298	Vacaville	6	1.3		664.0	737.0	751.0	2,152.0	0.0	510.8	566.9	577.7	1,655.4	
UC Davis		EC-0299	Vacaville	6	1.3		684.0	737.0	751.0	2,172.0	0.0	526.2	566.9	577.7	1,670.8	
UC Davis		EC-0320	Davis	17	1.5	10,672.0	8,890.0	10,852.0	11,265.0	41,679.0	7,114.7	5,926.7	7,234.7	7,510.0	27,786.0	
Woodland Nut Oils		EC00312	Woodland	24	1.5	1,216.0	1,442.0	1,511.0	1,070.0	5,239.0	810.7	961.3	1,007.3	713.3	3,492.7	
						Q1	Q2	Q3	Q4	Annual	Q1	Q2	Q3	Q4	Annual	
(Note)			Total Available Offsets	lb		122,508.0	136,022.5	85,684.0	155,951.5	507,175.9	81,672.0	90,819.9	57,711.2	104,121.7	334,324.8	
Rice burn credit applications under review by District.			Total Retained Offsets	lb		3,724.7			39,336.7		2,483.1	556.8	0.0	26,224.5		
Offset quantities are estimated based on formulae in Rule			Total Surrendered Offsets	lb		118,783.3	136,022.5	85,684.0	116,614.8	457,104.6	79,188.9	90,263.2	57,711.2	77,897.2	305,060.5	
<b>Rice burn adjustment</b>				Ton		59.39	68.01	42.84	58.31	228.55	39.59	45.13	28.86	38.95	152.53	
The amount of available ag burn credits in the District is limited to the amounts shown below.			Shifting between quarters	Ton								(11.55)	11.55			
The certificate shown will be reduced downward to be less than the maximum.			VOC for NOx (2.6:1 ratio)	Ton							0.00	0.00	0.00	0.00	0.00	
			Mitigation requirements	Ton		39.59	33.59	40.40	38.95	152.53	39.59	33.59	40.40	38.95	152.53	
			Excess (shortfall), ton	ton		19.80	34.42	2.44	19.36	76.02	0.00	(0.00)	(0.00)	0.00	(0.00)	
max rice burn credits						88,232.0	81,929.7	25,209.1	119,743.4							

98001-00R added on 8/28/09  
 00837 added on 8/28/09  
 00635 added on 8/28/09  
 00996 added on 8/28/09  
 01050 added on 8/28/09  
 01046 added on 8/28/09  
 00995 added on 8/28/09  
 Calpine EC 0341 removed on 8/31/09: unavailable per S. McLaughlin email 8/31/09

Table 3. (Rev. 10/01/09)

CPVVS Offset Plan (ROC)

Credit Holder	Source of credits	Cert. No	Reduction Site	Distance (miles)	Dist. Ratio	Adjusted for Distance										
						Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	
Adams Group	Rice burn	EC-0189	Cty Rd 7 & Cty Road 95B	37	1.5	8,087.0	7,509.0	2,311.0	10,975.0	28,882.0	5,391.3	5,006.0	1,540.7	7,316.7	19,254.7	
Adams Group	Rice burn	EC-0191	Dunnigan	37	1.5	17,408.0	15,723.0	3,931.0	19,093.0	56,155.0	11,605.3	10,482.0	2,620.7	12,728.7	37,436.7	
Beltrami Trust	Rice burn	EC-108	County Rd 36 & Cty Rd 106	16	1.5	4,551.0		2,044.0		6,595.0	3,034.0	0.0	1,362.7	0.0	4,396.7	
Conaway	Rice burn	Pending (note)	Woodland	25	1.5	14,805.0	13,747.5	4,230.0	20,092.5	52,875.0	9,870.0	9,165.0	2,820.0	13,395.0	35,250.0	
Coppell & Ireland	Rice burn	EC-0114	Cty Rd 35 & Cty Rd 104	16	1.5	1,888.0		848.0		2,736.0	1,258.7	0.0	565.3	0.0	1,824.0	
Jack Wallace	Rice burn	EC-0110	Woodland	24	1.5	13,307.0	7,081.0	4,227.0	8,599.0	33,214.0	8,871.3	4,720.7	2,818.0	5,732.7	22,142.7	
Reclamation District	Rice burn	EC-0235(note)	Reclamation District 108	37	1.5	19,771.0	18,359.0	5,649.0	26,832.0	70,611.0	13,180.7	12,239.3	3,766.0	17,888.0	47,074.0	
River Garden Farms	Rice burn	EC-0273 (note)	River Garden Farms	35	1.5	20,586.0	19,116.0	5,882.0	27,938.0	73,522.0	13,724.0	12,744.0	3,921.3	18,625.3	49,014.7	
Wallace Construction	Rice burn	EC-0112	CR 16 & CR 116	31	1.5	4,482.0	2,623.0	1,910.0	3,186.0	12,201.0	2,988.0	1,748.7	1,273.3	2,124.0	8,134.0	
<b>Rice Burn Adjustment</b>					1.5	<b>(25,137.0)</b>	<b>(10,106.8)</b>	<b>(8,246.9)</b>	<b>(8,486.1)</b>		<b>(16,758.0)</b>	<b>(6,737.9)</b>	<b>(5,497.9)</b>	<b>(5,657.4)</b>	<b>(34,651.1)</b>	
Lauppe, Daryl	Agricultural Burning	20002-PB-01R	S. Sutter County		1.5	2,084.5	1,355.0	369.5	2,341.0	6,160.0	1,396.3	903.3	246.3	1,560.7	4,106.7	
Lauppe, Daryl	Agricultural Burning	20009-01R	S. Sutter County		1.5	0.0	2,930.0	2,386.5	0.0	5,316.5	0.0	1,953.3	1,591.0	0.0	3,544.3	
Lauppe, Daryl	Agricultural Burning	20002-01R	S. Sutter County		1.5	2,185.0	1,414.0	385.5	2,442.0	6,426.5	1,456.7	942.7	257.0	1,628.0	4,284.3	
Adams Schwab and Adams		EC-0042	Woodland	24	1.5	35.0	34.0	34.0	47.0	150.0	23.3	22.7	22.7	31.3	100.0	
Alza Corporation		EC-0272	Vacaville	6	1.3	17.0	26.0	14.0	18.0	75.0	13.1	20.0	10.8	13.8	57.7	
Alza Corporation		EC-0321	Vacaville	6	1.3	382.0	2,800.0	1,913.0	295.0	5,390.0	293.8	2,153.8	1,471.5	226.9	4,146.2	
Calpine		EC-0269	Clarksburg	22	1.5			460.0	806.0	1,266.0	0.0	0.0	306.7	537.3	844.0	
Leer-West		EC-0292	Woodland	24	1.5	11,356.0	11,802.0	12,885.0	9,882.0	45,925.0	7,570.7	7,868.0	8,590.0	6,588.0	30,616.7	
Mariani Packing Comp		EC-0287	Vacaville	6	1.3			139.0		139.0	0.0	0.0	106.9	0.0	106.9	
Mariani Packing Comp		EC-0288	Vacaville	6	1.3			139.0		139.0	0.0	0.0	106.9	0.0	106.9	
Mariani Packing Comp		EC-0289	Vacaville	6	1.3			139.0		139.0	0.0	0.0	106.9	0.0	106.9	
Mariani Packing Comp		EC-0290	Vacaville	6	1.3	120.0	100.0	111.0	114.0	445.0	92.3	76.9	85.4	87.7	342.3	
Mariani Packing Comp		EC-0291	Vacaville	6	1.3	120.0	100.0	111.0	114.0	445.0	92.3	76.9	85.4	87.7	342.3	
Pacific International Rice Mills		EC-0223	Woodland	24	1.5			23.0	58.0	81.0	0.0	0.0	15.3	38.7	54.0	
Teichert Aggregates		EC-0240	Esparto	25	1.5	54.0	63.0	38.0	51.0	206.0	36.0	42.0	25.3	34.0	137.3	
UC Davis		EC-0198	Vacaville	6	1.3			139.0		139.0	0.0	0.0	106.9	0.0	106.9	
UC Davis		EC-0199	Vacaville	6	1.3			139.0		139.0	0.0	0.0	106.9	0.0	106.9	
UC Davis		EC-0200	Vacaville	6	1.3			139.0		139.0	0.0	0.0	106.9	0.0	106.9	
UC Davis		EC-0201	Davis	17	1.5		1.0	188.0	21.0	210.0	0.0	0.7	125.3	14.0	140.0	
UC Davis		EC-0203	Davis	17	1.5			200.0	25.0	225.0	0.0	0.0	133.3	16.7	150.0	
UC Davis		EC-0260	Clarksburg	22	1.5	8.0	674.0	215.0	280.0	1,177.0	5.3	449.3	143.3	186.7	784.7	
UC Davis		EC-0261	Clarksburg	22	1.5	3.0	221.0	70.0	92.0	386.0	2.0	147.3	46.7	61.3	257.3	
UC Davis		EC-0262	Clarksburg	22	1.5	17.0	1,381.0	441.0	574.0	2,413.0	11.3	920.7	294.0	382.7	1,608.7	
UC Davis		EC-0263	Clarksburg	22	1.5	141.0	5,694.0	3,274.0	4,054.0	13,163.0	94.0	3,796.0	2,182.7	2,702.7	8,775.3	
UC Davis		EC-0320	Davis	17	1.5	177.0	148.0	181.0	188.0	694.0	118.0	98.7	120.7	125.3	462.7	
Woodland Nut Oils		EC00312	Woodland	24	1.5	174.0	207.0	217.0	154.0	752.0	116.0	138.0	144.7	102.7	501.3	
						Q1	Q2	Q3	Q4	Annual	Q1	Q2	Q3	Q4	Annual	
Total Available Offsets						lb	96,631.5	103,001.7	47,135.6	129,795.4	428,531.0	64,486.5	68,978.2	31,729.7	86,579.1	251,773.5
Rice burn credit applications under review by District.						lb	57,340.5			91,198.3		38,227.0	43,566.2	4,936.2	60,798.8	
Offset quantities are estimated based on formulae in Rule						lb	39,291.0	103,001.7	47,135.6	38,587.2	228,015.6	26,259.6	25,411.9	26,793.5	25,780.3	104,245.3
						Ton	19.65	51.50	23.57	19.29	114.01	13.13	12.71	13.40	12.89	52.12
Shifting between quarters						Ton										
VOC for NOx (2.6:1 ratio)						Ton					0.00	0.00	0.00	0.00	0.00	
Mitigation requirements						Ton	13.13	12.71	13.40	12.89	52.12	13.13	12.71	13.40	12.89	52.12
CEC Mitigation (1:1 on an annual basis)						YSAQMD Offsets (1:1, adjusted for distance)										
Excess (shortfall), ton						ton	6.52	38.79	10.17	6.40	61.89	0.00	(0.00)	(0.00)	0.00	(0.00)
max rice burn credits							79,748.0	74,051.7	22,785.1	108,229.4						

Table 4. (Rev. 10/01/09)

CPVVS Offset Plan (PM10)

Credit Holder	Source of credits	Cert. No	Reduction Site	Distance (miles)	Dist. Ratio	Original Offsets					Adjusted for Distance				
						Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb
Grey K Holdings	Rice burn	EC-0303	Cty Rd 36 & Cty Rd 106	16	1.5	12,977.0		5,830.0		18,807.0	8,651.3	0.0	3,886.7	0.0	12,538.0
Grey K Holdings	Rice burn	EC-0304	Cty Rd 35 & Cty Rd 104	16	1.5	5,385.0		2,419.0		7,804.0	3,590.0	0.0	1,612.7	0.0	5,202.7
Grey K Holdings	Rice burn	EC-0305	Cty Rd 14 & Cty R 102	37	1.5	11,093.0	4,290.0	3,923.0	5,209.0	24,515.0	7,395.3	2,860.0	2,615.3	3,472.7	16,343.3
Grey K Holdings	Rice burn	EC-0306	Cty Rd 16 & Cty Rd 116	37	1.5	9,717.0	1,589.0	3,972.0	1,930.0	17,208.0	6,478.0	1,059.3	2,648.0	1,286.7	11,472.0
Grey K Holdings	Rice burn	EC-0307	Dunnigan	37	1.5	10,545.0	9,525.0	2,381.0	11,566.0	34,017.0	7,030.0	6,350.0	1,587.3	7,710.7	22,678.0
Grey K Holdings	Rice burn	EC-0308	Cty Rd 7 & Cty Road 95B	37	1.5	5,424.0	4,899.0	1,225.0	5,948.0	17,496.0	3,616.0	3,266.0	816.7	3,965.3	11,664.0
Reclamation District	Rice burn	EC-0235 (note)	Reclamation District 108	37	1.5	26,502.0	24,609.0	7,572.0	35,966.0	94,649.0	17,668.0	16,406.0	5,048.0	23,977.3	63,099.3
River Garden Farms	Rice burn	EC-0273 (note)	River Garden Farms	35	1.5	32,412.0	30,366.0	10,293.0	37,362.0	110,433.0	21,608.0	20,244.0	6,862.0	24,908.0	73,622.0
<b>Rice Burn Adjustment</b>						<b>(7,159.0)</b>	<b>0.0</b>	<b>(7,073.3)</b>	<b>0.0</b>	<b>(4,772.7)</b>	<b>0.0</b>	<b>(4,715.5)</b>	<b>0.0</b>	<b>(9,488.2)</b>	
Lauppe, Daryl	Agricultural Burning	20002-PB-01R	S. Sutter County		1.5	2,807.5	1,816.5	495.5	3,137.5	8,257.0	1,871.7	1,211.0	330.3	2,091.7	5,504.7
Lauppe, Daryl	Agricultural Burning	20009-01R	S. Sutter County		1.5	0.0	3,312.0	3,447.0	0.0	6,759.0	0.0	2,208.0	2,298.0	0.0	4,506.0
Lauppe, Daryl	Agricultural Burning	20002-01R	S. Sutter County		1.5	2,458.0	1,509.5	434.0	2,747.5	7,149.0	1,638.7	1,006.3	289.3	1,831.7	4,766.0
Calpine		EC-0083	Clarksburg	22	1.5		1,339.0	28,275.0	11,270.0	40,884.0	0.0	892.7	18,850.0	7,513.3	27,256.0
Calpine		EC-0269	Clarksburg	22	1.5		5,316.0	4,472.0		9,788.0	0.0	3,544.0	2,981.3	0.0	6,525.3
Mariani Packing Comp		EC-0287	Vacaville	6	1.2			307.0		307.0	0.0	0.0	255.8	0.0	255.8
Mariani Packing Comp		EC-0288	Vacaville	6	1.2			307.0		307.0	0.0	0.0	255.8	0.0	255.8
Mariani Packing Comp		EC-0289	Vacaville	6	1.2			307.0		307.0	0.0	0.0	255.8	0.0	255.8
Mariani Packing Comp		EC-0290	Vacaville	6	1.2	166.0	139.0	154.0	157.0	616.0	138.3	115.8	128.3	130.8	513.3
Mariani Packing Comp		EC-0291	Vacaville	6	1.2	166.0	139.0	154.0	157.0	616.0	138.3	115.8	128.3	130.8	513.3
Pacific International Rice Mills		EC-0223	Woodland	24	1.5			662.0	1,283.0	1,945.0	0.0	0.0	441.3	855.3	1,296.7
Teichert Aggregates		EC-0240	Esparto	25	1.5	68.0	79.0	48.0	65.0	260.0	45.3	52.7	32.0	43.3	173.3
UC Davis		EC-0198	Vacaville	6	1.2			307.0		307.0	0.0	0.0	255.8	0.0	255.8
UC Davis		EC-0199	Vacaville	6	1.2			307.0		307.0	0.0	0.0	255.8	0.0	255.8
UC Davis		EC-0200	Vacaville	6	1.2			307.0		307.0	0.0	0.0	255.8	0.0	255.8
UC Davis		EC-0201	Davis	17	1.5		2.0	403.0	46.0	451.0	0.0	1.3	268.7	30.7	300.7
UC Davis		EC-0203	Davis	17	1.5		1.0	429.0	54.0	484.0	0.0	0.7	286.0	36.0	322.7
UC Davis		EC-0320	Davis	17	1.5	558.0	465.0	568.0	590.0	2,181.0	372.0	310.0	378.7	393.3	1,454.0
Woodland Nut Oils		EC00312	Woodland	24	1.5	2.0	2.0	2.0	1.0	7.0	1.3	1.3	1.3	0.7	4.7
						Q1	Q2	Q3	Q4	Annual	Q1	Q2	Q3	Q4	Annual
Rice burn credit applications under review by District. Offset quantities are estimated based on formulae in Rule						lb	lb	lb	lb	lb	lb	lb	lb	lb	lb
Total Available Offsets						113,121.5	89,398.0	71,927.2	117,489.0	406,168.0	75,469.7	59,645.0	48,309.8	78,378.3	261,802.8
Total Retained Offsets						48,930.0	27,008.8	6,871.9	54,224.7	137,035.4	32,620.0	18,005.9	4,581.3	36,149.8	91,356.9
Total Surrendered Offsets						64,191.5	62,389.2	65,055.3	63,264.3	254,900.3	42,849.7	41,639.1	43,728.5	42,228.5	170,445.9
Shifting between quarters						Ton	Ton	Ton	Ton	Ton	Ton	Ton	Ton	Ton	Ton
VOC for NOx (2.6:1 ratio)															
Mitigation requirements						Ton	Ton	Ton	Ton	Ton	Ton	Ton	Ton	Ton	Ton
Excess (shortfall), ton						ton	ton	ton	ton	ton	ton	ton	ton	ton	ton
max rice burn credits						106,896.0	99,260.6	30,541.7	145,073.1						

Table 5. (Rev. 10/01/09)

CPVVS Offset Plan (SOx)

Credit Holder	Source of credits	Cert. No	Reduction Site	Distance (miles)	Dist. Ratio	Adjusted for Distance										
						Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	
Conaway	Rice burn	Pending (note)	Woodland	25	1.5	3,465.0	3,217.5	990.0	4,702.5	12,375.0	2,310.0	2,145.0	660.0	3,135.0	8,250.0	
Grey K Holdings	Rice burn	EC-0303	Cty Rd 36 & Cty Rd 106	16	1.5	440.0		198.0		638.0	293.3	0.0	132.0	0.0	425.3	
Grey K Holdings	Rice burn	EC-0304	Cty Rd 35 & Cty Rd 104	16	1.5	183.0		82.0		265.0	122.0	0.0	54.7	0.0	176.7	
Grey K Holdings	Rice burn	EC-0305	Cty Rd 14 & Cty R 102	37	1.5	1,044.0	749.0	284.0	910.0	2,987.0	696.0	499.3	189.3	606.7	1,991.3	
Grey K Holdings	Rice burn	EC-0306	Cty Rd 16 & Cty Rd 116	37	1.5	577.0	277.0	191.0	337.0	1,382.0	384.7	184.7	127.3	224.7	921.3	
Grey K Holdings	Rice burn	EC-0307	Dunnigan	37	1.5	1,841.0	1,663.0	416.0	2,019.0	5,939.0	1,227.3	1,108.7	277.3	1,346.0	3,959.3	
Grey K Holdings	Rice burn	EC-0308	Cty Rd 7 & Cty Road 95B	37	1.5	947.0	855.0	214.0	1,039.0	3,055.0	631.3	570.0	142.7	692.7	2,036.7	
Reclamation District	Rice burn	EC-0235 (note)	Reclamation District 108	37	1.5	4,627.0	4,297.0	1,322.0	6,280.0	16,526.0	3,084.7	2,864.7	881.3	4,186.7	11,017.3	
River Garden Farms	Rice burn	EC-0273 (note)	River Garden Farms	35	1.5	4,818.0	4,474.0	1,377.0	6,539.0	17,208.0	3,212.0	2,982.7	918.0	4,359.3	11,472.0	
Lauppe, Daryl	Agricultural Burning	20002-PB-01R	S. Sutter County	1.5	1.5	490.0	317.0	86.5	548.0	1,441.5	326.7	211.3	57.7	365.3	961.0	
Lauppe, Daryl	Agricultural Burning	20009-01R	S. Sutter County	1.5	1.5	0.0	1,809.0	1,882.5	0.0	3,691.5	0.0	1,208.0	1,255.0	0.0	2,461.0	
Lauppe, Daryl	Agricultural Burning	20002-01R	S. Sutter County	1.5	1.5	505.5	327.0	89.0	564.5	1,486.0	337.0	218.0	59.3	376.3	990.7	
Adams Schwab and Adams		EC-0042	Woodland	24	1.5	4.0	4.0	4.0	5.0	17.0	2.7	2.7	2.7	3.3	11.3	
Mariani Packing Comp		EC-0287	Vacaville	6	1.2			30.0		30.0	0.0	0.0	25.0	0.0	25.0	
Mariani Packing Comp		EC-0288	Vacaville	6	1.2			30.0		30.0	0.0	0.0	25.0	0.0	25.0	
Mariani Packing Comp		EC-0289	Vacaville	6	1.2			30.0		30.0	0.0	0.0	25.0	0.0	25.0	
Mariani Packing Comp		EC-0290	Vacaville	6	1.2	13.0	11.0	12.0	12.0	48.0	10.8	9.2	10.0	10.0	40.0	
Mariani Packing Comp		EC-0291	Vacaville	6	1.2	13.0	11.0	12.0	12.0	48.0	10.8	9.2	10.0	10.0	40.0	
Pacific International Rice Mills		EC-0223	Woodland	24	1.5	0.0	0.0	4.0	7.0	11.0	0.0	0.0	2.7	4.7	7.3	
Teichert Aggregates		EC-0240	Esparto	25	1.5	12.0	14.0	9.0	11.0	46.0	8.0	9.3	6.0	7.3	30.7	
UC Davis		EC-0198	Vacaville	6	1.2			30.0		30.0	0.0	0.0	25.0	0.0	25.0	
UC Davis		EC-0199	Vacaville	6	1.2			30.0		30.0	0.0	0.0	25.0	0.0	25.0	
UC Davis		EC-0200	Vacaville	6	1.2			30.0		30.0	0.0	0.0	25.0	0.0	25.0	
UC Davis		EC-0201	Davis	17	1.5			81.0	9.0	90.0	0.0	0.0	54.0	6.0	60.0	
UC Davis		EC-0203	Davis	17	1.5			86.0	11.0	97.0	0.0	0.0	57.3	7.3	64.7	
UC Davis		EC-0258	Clarksburg	22	1.5	35.0	309.0	440.0	420.0	1,204.0	23.3	206.0	293.3	280.0	802.7	
Woodland Nut Oils		EC00312	Woodland	24	1.5	1.0	1.0	1.0	1.0	4.0	0.7	0.7	0.7	0.7	2.7	
Total Available Offsets						lb	19,015.5	18,335.5	7,961.0	23,427.0	68,739.0	12,681.3	12,227.3	5,341.3	15,622.0	45,872.0
Total Retained Offsets						lb	10,804.7	10,804.7	7,961.0	10,804.7	40,375.1	7,203.1	7,203.1	5,307.3	7,203.1	45,872.0
Total Surrendered Offsets						lb	8,210.8	7,530.8	0.0	12,622.3	28,363.9	5,478.2	5,024.2	34.0	8,418.9	18,955.3
Offset quantities are estimated based on formulae in Rule						Ton	4.11	3.77	0.00	6.31	14.18	2.74	2.51	0.02	4.21	9.48
Shifting between quarters						Ton										
VOC for NOx (2.6:1 ratio)						Ton										
Mitigation requirements						Ton	3.57	3.46	3.65	3.51	14.18					0.00
YSAQMD Offsets (1:1, adjusted for distance)						Ton										
Excess (shortfall), ton						ton	0.53	0.31	(3.65)	2.80	0.00	2.74	2.51	0.02	4.21	9.48
max rice burn credits							18,664.0	17,330.9	5,332.6	25,329.7						

Table 6. (Rev. 10/01/09)

CPVVS Offset Plan (CO)

Credit Holder	Source of credits	Cert. No	Reduction Site	Distance (miles)	Dist. Ratio						Adjusted for Distance					
						Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	Q1 lb	Q2 lb	Q3 lb	Q4 lb	Annual lb	
Conaway	Rice burn	Pending (note)	Woodland	25	1.5	180,810.0	167,895.0	51,660.0	245,385.0	645,750.0	120,540.0	111,930.0	34,440.0	163,590.0	430,500.0	
Jack Wallace	Rice burn	EC-0110	Woodland	24	1.5	109,346.0	56,515.0	35,144.0	68,626.0	269,631.0	72,897.3	37,676.7	23,429.3	45,750.7	179,754.0	
Reclamation District	Rice burn	EC-0235 (note)	Reclamation District 108	37	1.5	241,459.0	224,212.0	68,988.0	327,694.0	862,353.0	160,972.7	149,474.7	45,992.0	218,462.7	574,902.0	
River Garden Farms	Rice burn	EC-0273 (note)	River Garden Farms	35	1.5	251,412.0	233,454.0	71,832.0	341,202.0	897,900.0	167,608.0	155,636.0	47,888.0	227,468.0	598,600.0	
Lauppe, Daryl	Agricultural Burning	20002-PB-01R	S. Sutter County		1.5	25,579.0	16,551.0	4,514.0	28,588.8	75,232.8	17,052.7	11,034.0	3,009.3	19,059.2	50,155.2	
Lauppe, Daryl	Agricultural Burning	20009-01R	S. Sutter County		1.5	0.0	27,514.5	28,638.0	0.0	56,152.5	0.0	18,343.0	19,092.0	0.0	37,435.0	
Lauppe, Daryl	Agricultural Burning	20002-01R	S. Sutter County		1.5	45,339.0	29,337.0	8,001.0	50,673.0	133,350.0	30,226.0	19,658.0	5,334.0	33,782.0	88,900.0	
Adams Schwab and Adams		EC-0042	Woodland	24	1.5	138.0	135.0	136.0	187.0	596.0	92.0	90.0	90.7	124.7	397.3	
Mariani Packing Comp		EC-0287	Vacaville	6	1.2			50.0		50.0	0.0	0.0	41.7	0.0	41.7	
Mariani Packing Comp		EC-0288	Vacaville	6	1.2			446.0		446.0	0.0	0.0	371.7	0.0	371.7	
Mariani Packing Comp		EC-0289	Vacaville	6	1.2			843.0		843.0	0.0	0.0	702.5	0.0	702.5	
Mariani Packing Comp		EC-0290	Vacaville	6	1.2	1,837.0	1,533.0	1,701.0	1,734.0	6,805.0	1,530.8	1,277.5	1,417.5	1,445.0	5,670.8	
Mariani Packing Comp		EC-0291	Vacaville	6	1.2	1,837.0	1,533.0	1,701.0	1,734.0	6,805.0	1,530.8	1,277.5	1,417.5	1,445.0	5,670.8	
Pacific Coast Producers		EC-0206	Davis	17	1.5	0.0	0.0	5,990.0	0.0	5,990.0	0.0	0.0	3,993.3	0.0	3,993.3	
Pacific International Rice Mills		EC-0223	Woodland	24	1.5	0.0	0.0	122.0	218.0	340.0	0.0	0.0	81.3	145.3	226.7	
Teichert Aggregates		EC-0240	Esparto	25	1.5	359.0	416.0	250.0	342.0	1,367.0	239.3	277.3	166.7	228.0	911.3	
UC Davis		EC-0198	Vacaville	6	1.2			50.0		50.0	0.0	0.0	41.7	0.0	41.7	
UC Davis		EC-0199	Vacaville	6	1.2			446.0		446.0	0.0	0.0	371.7	0.0	371.7	
UC Davis		EC-0200	Vacaville	6	1.2			843.0		843.0	0.0	0.0	702.5	0.0	702.5	
UC Davis		EC-0320	Davis	17	1.5	4,630.0	3,858.0	4,710.0	4,888.0	18,086.0	3,086.7	2,572.0	3,140.0	3,258.7	12,057.3	
Woodland Nut Oils		EC00312	Woodland	24	1.5	460.0	546.0	572.0	405.0	1,983.0	306.7	364.0	381.3	270.0	1,322.0	
Total Available Offsets						lb	863,206.0	763,499.5	286,637.0	1,071,676.8	2,985,019.3	576,083.0	509,510.7	192,104.7	715,029.2	1,992,727.5
Total Retained Offsets						lb	711,806.2	633,624.9	132,648.5	921,012.4	2,399,092.1	474,537.5	422,416.6	88,432.4	614,008.3	1,599,394.8
Total Surrendered Offsets						lb	151,399.8	129,874.6	153,988.5	150,664.4	585,927.2	101,545.5	87,094.0	103,672.3	101,020.9	393,332.8
Shifting between quarters						Ton	75.70	64.94	76.99	75.33	292.96	50.77	43.55	51.84	50.51	196.67
VOC for NOx (2.6:1 ratio)						Ton										
Mitigation requirements						Ton					0.00	50.77	43.55	51.84	50.51	196.67
Excess (shortfall), ton						ton	75.70	64.94	76.99	75.33	292.96	0.00	0.00	0.00	0.00	0.00
max rice burn credits							973,928.0	904,361.7	278,265.1	1,321,759.4						

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**STATE OF CALIFORNIA  
ENERGY RESOURCES  
CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:	)	Docket No. 08-AFC-11
	)	
Application for Certification,	)	<b>PROOF OF SERVICE</b>
for the CPV VACA STATION POWER PLANT	)	
PROJECT	)	(February 18, 2009)
by CPV Vacaville, LLC	)	
_____	)	

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CPV VACA STATION POWER PLANT PROJECT  
CEC Docket No. 08-AFC-11

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**DECLARATION OF SERVICE**

I, Paul Kihm, declare that on October 1, 2009, I served and filed copies of the attached:

**LETTER TO THE YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT  
REGARDING APPLICANT'S REVISED EMISSIONS OFFSET PLAN**

to all parties identified on the Proof of Service List above in the following manner:

**California Energy Commission Docket Unit**

- Transmission via electronic mail and by depositing one copy with FedEx overnight mail delivery service at Costa Mesa, California, with delivery fees thereon fully prepaid and addressed to the following:

**CALIFORNIA ENERGY COMMISSION**

Attn: DOCKET NO. 08-AFC-11

1516 Ninth Street, MS-4

Sacramento, California 95814-5512

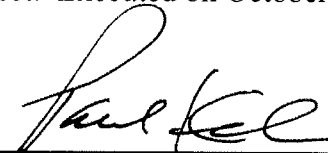
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

**For Service to All Other Parties**

- Transmission via electronic mail to all email addresses on the Proof of Service list; and
- by depositing one paper copy with the United States Postal Service via first-class mail at Costa Mesa, California, with postage fees thereon fully prepaid and addressed as provided on the Proof of Service list to those addresses **NOT** marked "email preferred."

I further declare that transmission via electronic mail and U.S. Mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 1, 2009, at Costa Mesa, California.

  
\_\_\_\_\_  
Paul Kihm