

BAAQMD response to comments on the proposed renewal Title V permit submitted by Calpine in a March 1, 2012 letter from Maria Barroso to Brian Lusher.

Plant #B1180, Application 22569

Comment 1: Calpine requested that the District change the facility contact and alternative responsible official. The District has revised the cover page of the final permit as requested.

Comment 2: Calpine requested that all references to “after dry low NOx combustors become operational” be removed from the final permit since the combustors are operational. The District has removed the future effective references regarding the dry low NOx combustors from Table IV and Table VII for S-100.

Comment 3: Calpine requested 60.334(b) be removed from the applicable requirements since S-100 no longer uses steam injection for NOx control. The District consulted with EPA Region 9 staff on this issue. The District is leaving this in as an applicable requirement, since it is the basis for why the facility chose to install continuous emission monitors instead of monitoring the steam injection rate as allowed by Subpart GG.

Comment 4: Calpine requested that the 40 ppm NOx limit that applies to S-101 and S-102 be revised to 30 ppm in accordance with Regulation 9, Rule 7, Section 301.1. The 40 ppm limit is a federally enforceable NOx limit and will remain. S-101 and S-102 must comply with the 40 ppm federally enforceable NOx limit and also meet the non-federally enforceable limit contained in Regulation 9, Rule 7.

Comment 5: Calpine requested that the last sentence in condition 2780 part 9b be removed since the dry low NOx combustors are in operation. The District has made this change as requested.

Comment 6: Calpine requested that condition 2780 part 1a(i) and 1e be revised to remove conditions that applied prior to the dry low NOx combustors becoming operational. The District has made these changes as requested.

Comment 7: Calpine requested that the Acid Rain Permit contact person be changed. The District has made this change as requested.