

NOTICE INVITING WRITTEN PUBLIC COMMENT

NOTICE is hereby given that the Bay Area Air Quality Management District (Air District) has received an application for an alteration to the **Russell City Energy Center** to allow the plant to temporarily operate in simple-cycle mode, without its steam turbine, while the steam turbine is being replaced. The Russell City Energy Center (Air District Facility# B8136) is a power plant located at **3862 Depot Road in Hayward, California 94545**. It is owned and operated by the Russell City Energy Company, a subsidiary of Calpine Corporation (Calpine).

Calpine is proposing to blind off the steam turbine by installing a temporary isolating plate, along with a rupture disk and pressure relief vent. This will allow the steam from the heat recovery steam generators to bypass the steam turbine and be routed directly to the steam condenser. Without the steam turbine, Calpine will generate electricity using the plant's natural-gas-fired combustion turbines only. Generating power using only the combustion turbines is called "simple-cycle" operation, as opposed to using both the combustion turbines and the steam turbine, which is called "combined-cycle" operation. In simple-cycle mode, the facility can provide approximately 300 to 350 MW of generation capacity to provide frequency and voltage support to the applicable resource area. The proposed temporary alteration would also ensure that the facility can continue to provide Black Start service to the California Independent System Operator (CAISO) especially during the summer of 2021.

The California Energy Commission, with exclusive jurisdiction over the Russell City Energy Center under the Warren-Alquist State Energy Resources Conservation and Development Act, Public Resources Code §§ 25000 *et seq.*, has approved Calpine's petition for this alteration to allow the plant to operate in simple-cycle mode on a temporary basis until a replacement steam turbine has been installed.

Operating the facility in simple-cycle mode will not result in any increase in emissions. The temporary operation in simple-cycle mode will be subject to the same emission limits as currently apply for the combined-cycle mode. The only permit change that will be required is to temporarily remove the greenhouse gas efficiency requirement in the current permit condition, because the plant will not be able to generate as much power while the steam turbine is not operating. Calpine submitted this permit application (Air District Application No. 31198) and is requesting to be temporarily exempt for up to 3 months from the greenhouse gas efficiency requirement when operating the facility in simple-cycle mode.

The submitted application package for Application No. 31198 is available online: <https://www.baaqmd.gov/permits/major-facility-review-title-v/title-v-permits/page-resources/table-data/alameda/b8136/russell-city-energy-center>

Written comments on this application should be directed to Xuna Cai, Bay Area Air Quality Management District, 375 Beale Street, Suite 600, San Francisco, CA 94105, or by email to xcai@baaqmd.gov, and must be received no later than **August 30, 2021**.

Dated at San Francisco, the 23rd day of July 2021.

Signed by Damian Breen for Jack P. Broadbent

Jack P. Broadbent

Executive Air Pollution Control Officer

Bay Area Air Quality Management District