

October 27, 2006

Ms. Deborah Jordan, Director
Air Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is proposing a Significant Revision of the Major Facility Review (MFR) Permit for Facility #B4414

ALAMEDA COUNTY
Tom Bates
Scott Haggerty
Janet Lockhart
Nate Miley

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
(Vice-Chair)
Michael Shimansky
Gayle B. Uilkema
(Chair)

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Chris Daly
Jake McGoldrick
Gavin Newsom

SAN MATEO COUNTY
Jerry Hill
(Secretary)
Carol Klatt

SANTA CLARA COUNTY
Erin Garner
Yoriko Kishimoto
Liz Kniss
Patrick Kwok

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Application Numbers	Facility Number	Facility Name	Address, City	Type of Operation
11000	B4414	Creed Energy Center, LLC	6150 Creed Road Suisun City, CA 94585	Generation of Electricity

The main purpose of the proposed significant revision (Application # 11000) is to change permit conditions that have been revised under NSR application 11001. The proposed permit condition changes include the following:

1. Amend the definition of "hour" to "clock hour" since the facility's continuous emission monitors operate on a clock hour basis.
2. Condition #20136, part 18.2: Revise the ammonia slip monitoring language to agree with standard language in other Calpine power plant permits. The revised language will allow the use of a District-approved calculation method to monitor ammonia slip. This is not a relaxation of monitoring, but replaces the original calculation method that was inaccurate.
3. Condition #18102, part 24. Change the required source test frequency for the gas turbine from annual to every 8000 hours of gas turbine operation or once every 3 years, whichever comes first. This is a relaxation of monitoring and therefore is considered a significant revision pursuant to Regulation 2-6-226.3.

All proposed permit revisions are clearly shown in ~~strikeout~~ and underline formatting in the proposed permit.

The District has made a preliminary decision to issue the Significant Revision to the Major Facility Review Permit, but the final decision on the permit issuance will consider public and EPA comments on this preliminary decision. The notice inviting written public comments will be published in The Daily Republic. The final date for comments is December 4, 2006.

Enclosed for your information is a copy of the proposed permit and the statement of basis. If you have any questions regarding this project, please call Barry Young, Air Quality Engineering Manager, at: (415) 749-4721, fax (415) 749-5030.

Very truly yours,

Signed by Peter Hess for _____
Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

Enclosures

JB:BFB:vch

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