

February 15, 2011



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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

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

Re: Revision of Synthetic Minor Permit for Facility A3981,
GWF Power Systems Site 4

Dear Ms. Jordan:

The purpose of this letter is to issue an amended revision of the synthetic minor operating permit for the above facility.

The only amendment made is that a statement has been added in the Evaluation Report addressing EPA's comment on the recently revised SMOP regarding the applicability of Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) of the New Source Performance Standards to the Circulating Fluidized Bed Combustor. In response to EPA's comment, the following statement has been added in the Evaluation Report (page 5 under NSPS Section):

"NSPS Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) is applicable to the operations of the CFBC per Section 60.40b(a), because the CFBC was constructed after June 19, 1984, and is greater than 100 MMBTU/hr. The applicable emission standards, monitoring requirements and recording requirements of SO₂, PM, and NO_x are less stringent than the permit condition limits and requirements."

The synthetic minor operating permit is herein modified to include this applicable requirement and is attached.

The District will also notify the California Air Resources Board and the facility in writing of the amendment.

If you have any questions regarding this matter, please call Jim Karas, Air Quality Engineering Manager, at (415) 749-4742.

Very truly yours,

Jack P. Broadbent
Executive Officer/APCO

Signed by Brian F. Bateman
by Engineering Division

Enclosure