

Rivera, Shirley

From: Rivera, Shirley
Sent: Monday, January 13, 2014 10:16 AM
To: 'Timothy Mitro'
Cc: Buchanan, Tiffini; Rios, Gerardo; Sims, Mark
Subject: (FRAQMD) EPA Comments on PDOC for Sutter Energy Center

Tim,

Thanks for your patience in receipt of these comments, which represent a subset of comments from our Wednesday, 01/07 discussion. As discussed last week after we talked, you mentioned receiving our comments post 01/09/2014, close of the public comment period, would be acceptable. Below presents our comments on the following:

FACILITY: Sutter Energy Center

ACTION: Preliminary Determination of Compliance, Modification

PERMIT: Application 13005H

1. **Facility emissions, Particulates:** Please include emission estimates of PM and PM2.5. FRAQMD indicated it has assumed that PM = PM10 = PM2.5; please cite this in Section IV of the analysis. Therefore, where applicable, these pollutants should be referenced in the proposed permit requirements.
2. **Source test method specificity:** While we understand this was an unintended oversight, FRAQMD has indicated the specific NOx and CO source test methods will be included in the proposed permit "Emission Testing Requirements" subsection.
3. **NSPS, Subpart A and Db:** We note that NSPS-related submittals (e.g., notifications, plans, reports, etc.) are required to be submitted to the FRAQMD Air Pollution Control District; however, U.S. EPA also should be referenced. Therefore, please include a reference to *the Administrator*, which represents U.S. EPA. We are available to discuss this request in more detail.
4. **Natural gas:** We suggest specifying that the natural gas supply is pipeline quality natural gas (e.g., PUC-quality).

As a side note, we/EPA Region 9 are evaluating the PSD minor modification for this facility. It may be that we will have different or additional proposed permit conditions. FRAQMD is included in our public notice distribution list for this project. Meanwhile, if you would like to discuss our on-going evaluation, as well as our comments on your proposed permit, please feel free to contact us.

Thank you for the opportunity to provide comments on this proposed permit.

Best regards,

- Shirley

Week of Jan 13: *Planned* ****IN**** Mon-Fri; *Tentative Out* Tues (all day)

Week of Jan 20: *Planned* ****IN**** Tues-Fri; *Holiday Out* Mon

Shirley F. Rivera

T: (415) 972-3966 | F: (415) 947-3579 | Rivera.Shirley@epa.gov | Workspace #17112

U.S. EPA, Region 9, Air Permits Office (AIR-3) | 75 Hawthorne St., San Francisco, CA 94105



From: Timothy Mitro [<mailto:tmitro@fragmd.org>]
Sent: Thursday, December 05, 2013 9:56 AM
To: Rivera, Shirley; 'Bastian, Beverly@Energy'
Cc: R9AirPermits
Subject: PDOC - Sutter Energy Center - Feather River AQMD

Please note that the PDOC for the Sutter Energy Center's proposed boiler has been signed. The public notice will be placed in this Saturday's Appeal Democrat newspaper, which will allow a 30 day commenting period. A specific hardcopy public notice will also be sent to your corresponding agencies.

Timothy Mitro
Feather River AQMD - Air Quality Engineer II
(530) 634-7659 ext. 208
1007 Live Oak Blvd, Suite B-3
Yuba City, CA 95991
www.fraqmd.org