

June 14, 2000

Dr. Deborah Jordan
Acting Director, Air Division
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco CA 94105

RE: PE Berkeley
BAAQMD Application 579

Dear Dr. Jordan:

This is to advise you that PE Berkeley is proposing a major modification at its facility in Berkeley, and that therefore, the BAAQMD is proposing to issue a significant revision to the Title V permit. The permit revision is subject to the public notice and 30-day public comment requirements of District Regulations 2-2-405 and 2-6-414. This is the same modification for which notice was provided on March 7, 2000. Today's notice includes additional information about the project.

The purpose of the modification/revision is to allow an increase in the carbon monoxide (CO) emissions from a maximum of 919 lb/day to 2195 lb/day or 178.64 tons/yr when burning natural gas. This increase was requested to enable the facility to use steam injection for control on nitrogen oxides. The nitrogen oxide limit was lowered on January 1, 2000, from 30.2 ppmv to 20.2 ppmv, pursuant to the District's Regulation 9, Rule 9. Also, the nitrogen oxide and sulfur dioxide monitoring requirement in the Federal New Source Performance Standards, Subpart GG will be subsumed by monitoring for District requirements.

This modification/revision is also a major modification of the facility due to the increase in CO, and therefore subject to the Prevention of Significant Deterioration (PSD) provisions of BAAQMD Regulation 2-2-305. A CO modeling analysis submitted by PE Berkeley in accordance with BAAQMD Regulation 2-2-414 indicates that the proposed modification would not interfere with the attainment or maintenance of the applicable National Ambient Air Quality Standard for CO. No PSD increment was consumed, because there will be no increase in nitrogen oxides, sulfur dioxide, or particulate emissions.

Enclosed is a copy of the proposed Title V permit, the permit evaluation for this application and one copy of the Notice Inviting Written Public Comment. Please submit any comments you may have on the intended action by July 14, 2000.

Very truly yours,

Ellen Garvey
Executive Officer/Air Pollution Control Officer

Enclosure
EG:dns