

Mr. David Howekamp  
Director, Air Management Division  
United States Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Re: Minor revisions to Calpine Gilroy Cogen, L.P. Title V Permit  
Application # 445, Plant #B1180

Dear Mr. Howekamp:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor modification to the Major Facility Review Permit for Calpine Gilroy Cogen, L.P. – Facility #B1180.

The facility is replacing the turbine nozzles, buckets, and associated hardware at S100, Turbine, due to wear. The replacement parts will also increase the fuel capacity of the turbine by 4.3%. The facility is using these parts, since GE no longer makes identical replacement parts. The facility is not applying for an increase in the NO<sub>x</sub> or CO limit since the replacement parts will not cause an increase in these pollutants. There will be small increases in SO<sub>2</sub>, POC, and particulate. The daily increases will be less than 10 lbs/day and will not trigger NSR per BAAQMD Regulation 2-2.

To ensure that the increase in POC and particulate is below 10 lbs/day, the facility will be required to perform a source test before and after the modification. Continuous emission monitors will be used to ensure that there is no increase of NO<sub>x</sub> or CO. The SO<sub>2</sub> increase is proportional to the increase in natural gas usage and is below the Regulation 2-2-301 trigger.

In addition to the specified changes to the permit conditions, the following minor changes and corrections have been made:

- The permit has been updated to include dates of new SIP approvals.
- Regulation 9-7-603, Compliance Determinations, omitted in error, has been added for Sources S101 and S102.
- The expiration date has been corrected.
- Reporting periods and due dates for reports have been added.
- Other minor corrections have been made.

All changes are clearly shown in strikeout/underline format.

Copies of the proposed modified Major Facility Review Permit and the evaluation report are enclosed for your review. If you have any questions on this matter, please call Brenda Cabral, Air Quality Engineer II, at (415) 749-4686.

Very truly yours,

Ellen Garvey  
Executive Officer/  
Air Pollution Control Officer

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Enclosures

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