

Washington State

ENERGY FACILITY SITE EVALUATION COUNCIL

Satsop Combustion Turbine Project
Prevention of Significant Deterioration/Notice of Construction
Permit No. EFSEC/2001-01 Amendment 3

RESPONSIVENESS SUMMARY

March 14, 2006

1 Background

In August 2005, Grays Harbor Energy, LLC, submitted a request to the Energy Facility Site Evaluation Council (EFSEC or Council) to amend the Prevention of Significant Deterioration/Notice of Construction (PSD/NOC) permit for the Satsop Combustion Turbine Project, sited near Elma, in Grays Harbor County, Washington. The request sought an extension of the time period allowed to suspend construction by 18 months, and to make several administrative corrections to EFSEC Permit No. EFSEC/2001-01, Amendment 2.

A preliminary approval of PSD/NOC permit No. EFSEC/2001-01, Amendment 3, was issued for public comment on January 9, 2006. Public notice of the comment period and of a public hearing on this matter was performed by publication of a legal notice in the Aberdeen Daily World (1/9/2006) and the Vidette (1/12/2006), and by mailing to EFSEC's interested persons and minutes and agendas lists for this project. Copies of the draft permit and associated fact sheet were made available for public reference in the W. H. Abel Memorial Library in Montesano, the EFSEC offices in Olympia, and Ecology's Offices in Lacey, Washington, on EFSEC's web site and to any interested person upon request.

A public hearing was also held on February 14, 2006 at the EFSEC offices, Conference Room 308, in Olympia, Washington. The public comment period closed at the end of business on February 14, 2006.

The Council received one written comment. No oral comments were received at the February 14, 2006, hearing. The comments received are summarized below, and responses to comments are given. Other changes to the permit are also indicated. Copies of the original comment letters are available upon request from the Energy Facility Site Evaluation Council

2 Response to Comment from Grays Harbor County

Comment: Grays Harbor County has reviewed the draft document and concurs with the Council's determination that the amendment does not represent a probable significant adverse impact to elements of the natural environment.

Response: Thank you for your comment. No changes are required to the final Approval as a result of this comment.

3 Changes to Permit from Draft to Final Approval

In addition to punctuation corrections throughout the permit, the following findings and approval conditions were corrected without making any changes to substantive permit requirements:

Findings:

3.3 Interim source growth did not affect conclusions from the original permit analysis regarding air quality impact of this project.

13.2 Any applicable PSD increment

The following Table indicates the maximum Class I and Class II increment consumed by this project.

POLLUTANT		Maximum ambient Class II area impact concentration ($\mu\text{g}/\text{m}^3$)	Class II area allowable increment ($\mu\text{g}/\text{m}^3$)	Maximum ambient Class I Area impact concentration ($\mu\text{g}/\text{m}^3$)	Class I area allowable increment ($\mu\text{g}/\text{m}^3$)
Particulate (PM_{10})*	24-Hour	4.86	17	0.23	8
	Annual	0.91	30	0.01	4
Nitrogen dioxide* Annual		0.898	25	0.008	2.5
Sulfur dioxide	3-Hour	13.54	20	0.26	25
	24-Hour	3.5	91	0.032	5
	Annual	0.29	512	0.001	2

*Evaluated at a higher emission rate than proposed to be permitted; see ~~fact sheet~~ technical support document and application materials for details.

18.2.2 For all other anticipated pollutants from the gas combustion turbines, heat recovery steam generators, auxiliary boiler, and cooling tower system BACT is the same as determined in Amendment 2.

18.2.3 For the emergency backup diesel generator and diesel engine-driven fire water pump ~~should~~ BACT constitutes the use of on-road diesel as defined in the Federal Code of Regulations at the time of purchase of the fuel oil.

Approval Conditions:

7.5.2 Determined by use of EPA Reference Method 9 or an equivalent method approved in advance by EFSEC.

5.3.5.1.4 Grays Harbor Energy LLC shall report to EFSEC on a monthly basis the quantity and average sulfur content of the natural gas burned by the CGT units at the facility. Total sulfur content ~~on~~ of the natural gas shall be substantiated by purchase records and vendor's reports or total sulfur content monitoring performed by Grays Harbor Energy LLC on the gas used at this facility.