

August 31, 2005

Mr. Allen Fiksdal
EFSEC Manager
Energy Facility Site Evaluation Council
PO Box 43172
Olympia WA 98504-3172

RE: Updated Best Available Control Analysis and Permit Extension Request

Dear Mr. Fiksdal:

The Satsop Combustion Turbine (CT) Project was granted a Final Approval on a Notice of Construction (NOC) and Prevention of Significant Deterioration (PSD) Application on November 2, 2001 (No. EFSEC/2001-01). On December 24, 2001 a request was submitted to EFSEC to modify some of the operating conditions and emission limits in the permit. Amendment 1 to the Site Certification Agreement was approved on January 2, 2003. Amendment 2 was approved on October 19, 2004 providing an eighteen month extension of the permit to restart construction as well as modifying some monitoring provisions of the permit. As construction of the project may not resume within the current eighteen month extension period, Grays Harbor Energy LLC is submitting this request for another eighteen month extension of the permit.

Pursuant to conversations with EFSEC and the Department of Ecology, the renewal process requires that the Best Available Control Technology (BACT) analysis for the project be re-evaluated. This submittal includes an updated BACT analysis that confirms no significant state-of-the-art advancement in BACT has occurred since the last BACT submittal and that the emission limits and control technologies in the current permit are consistent with recent BACT determinations.

Additionally, on July 13, 2005 a submittal was made to EFSEC requesting various administrative corrections to Amendment 2. While the corrections have no real bearing on the BACT analysis and permit extension request, Grays Harbor Energy LLC recognizes the economy of effort gained by combining these requests for the sake of public hearings and review.

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If we can provide any further information or support for our request, please don't hesitate to call me at (360) 279-9005 or Tom Donovan at (360) 482-4345.

Sincerely,

Cascade Environmental Management

Marie E. Piper

Attachment

cc: Irina Makarow, Energy Facility Site Evaluation Council
Mike Mills, Energy Facility Site Evaluation Council
Bernard Brady, Washington State Department of Ecology
Thomas Donovan, Grays Harbor Energy LLC
Frank Sarduy, Invenenergy Services LLC
Laura Schinnell, Energy Northwest
Karen McGaffey, Perkins Coie