



**sierra
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March 29, 2002

Seycd Sadredin
San Joaquin Valley Unified Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, CA 93726

DOCKET
01-AFC-20

DATE MAR 29 2002

RECD APR 24 2002

Subject: Interpollutant Ratio for VOC for NOx Offsets
Project Number 1011324: Avenal Energy (01-AFC-20)

Dear Mr. Sadredin:

In January 2002, we submitted to the District an analysis supporting a proposed VOC:NOx interpollutant offset ratio of 1.0:1 for the Avenal Energy project. We understand that analyses such as the one we prepared are inherently uncertain, particularly in a region with an ozone problem as complicated as the one facing the San Joaquin Valley district.

As a result, Avenal Energy is modifying its proposed VOC:NOx ratio from 1.0:1 to 2.0:1 to account for this uncertainty. With this revision, we believe that the District will be able to comfortably conclude that the proposed VOC:NOx trades for Avenal Energy will, in fact, result in a project that does not cause or contribute to a violation of an ambient air quality standard.

We understand that this ratio is in addition to the distance-based ratios that the District applies under its regulations.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Gary Rubenstein

cc: Dave Warner, SJVUAPCD
Errol Villegas, SJVUAPCD
Bob Cochran, Duke Energy
Mark Seedall, Duke Energy
Jane Luckhardt, Downey Brand
Matt Layton, California Energy Commission
Jim McKinney, California Energy Commission
Brewster Birdsall, Aspen Environmental Group

PROOF OF SERVICE (REVISED _____) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 04/24/02
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STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

In the Matter of:

Application for Certification
for the AVENAL ENERGY Project

Docket No. 01-AFC-20

PROOF OF SERVICE
[*ESTABLISHED 01/10/02]

I, **Mary Dyas** declare that on **April 24, 2002**, I deposited copies of the attached **Interpollutant Ratio for VIC for NOX Offsets – to Seyed Sadredin of SJVAPCD from Gary Rubenstein at Sierra Research**, in the United States mail at *Sacramento, CA* with first class postage thereon fully prepaid and addressed to the following:

DOCKET UNIT

Send the original signed document plus the required 12 copies to the address below:

CALIFORNIA ENERGY COMMISSION
DOCKET UNIT, MS-4
Attn: Docket No. 01-AFC-20
1516 Ninth Street
Sacramento, CA 95814-5512

* * * *

In addition to the documents sent to the Commission Docket Unit, also send individual copies of any documents to:

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I declare under penalty of perjury that the foregoing is true and correct

[signature]

* * * *

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FACSIMILE TRANSMITTAL FORM

DATE: March 29, 2002

TO: Seyed Sadredin
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FROM: Gary Rubenstein

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