

Grays Harbor Energy LLC

Grays Harbor Energy Center

October 30, 2009

Mr. James Luce, Chair
Energy Facility Site Evaluation Council
925 Plum Street SE, Building 4
Olympia, Washington 98504-3172

RE: Satsop Combustion Turbine Project
Submittal of Request for Amendment to Site Certification Agreement

Dear Chair Luce:

With this letter, Grays Harbor Energy LLC, the holder of the Site Certification Agreement (SCA) for the Satsop Combustion Turbine (CT) Project, is requesting an amendment to the SCA. The amendment request includes the following:

1. Changing the name of the project from the Satsop CT Project to the Grays Harbor Energy Center
2. Allowing for the addition of two combustion turbine generators and one steam generator (referred to as Units 3 and 4) to increase the facility capacity by approximately 650 MW to a total of approximately 1,300 MW
3. Enlarging the project site by 10 acres to allow space for construction laydown and access
4. Approval of a PSD permit for Units 3 and 4 (existing PSD permit would remain in place for Units 1 and 2)
5. Increasing the total maximum water usage from existing 9.2 cfs to 16 cfs – no new water authorizations are requested; the additional water would be either purchased or leased from the holder of an existing water right or authorization, such as the Grays Harbor Public Development Authority or the City of Aberdeen.

As proposed, the additional facilities will be located entirely within the boundaries of the existing 22-acre site. The additional 10-acres would be used for construction laydown and access, and would become a permanent part of the project site boundary.

With this amendment request, we have also included a red-line of the existing SCA showing the proposed text revisions.

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Submittal

As requested by Allen Fiksdal, we are submitting 30 copies of the amendment request in hard copy and 20 copies in electronic format on CDs.

We would appreciate the opportunity to meet with you and Council staff to provide additional information and to discuss the amendment consideration schedule. We would also like to make a brief presentation to the Council on the project at your November 10 meeting.

Designation of Agent

All official communications concerning this application during the application review process should be directed to Mr. Brett Oakleaf, for Grays Harbor Energy LLC. He is the designated agent for the project and may be contacted as cited below:

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Local contact is Mr. Todd Gatewood, Plant Manager for Grays Harbor Energy. Mr. Gatewood's contact information is as follows:

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Thank you for your consideration of our request.

Sincerely,

Grays Harbor Energy LLC



Mr. Brett Oakleaf
Director, Business Development
Invenergy LLC

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APPENDIX A AIR QUALITY

- A-1 BACT Analysis
- A-2 Combustion Turbine Rate Calculations
- A-3 Modeling Protocol
- A-4 Ozone Impact Analysis

APPENDIX B ACOUSTICAL TERMINOLOGY AND CONCEPTS USED IN NOISE MODELING

ABBREVIATIONS AND ACRONYMS

ACC	air-cooled direct condenser
ADTV	average daily traffic volumes
AQIA	air quality impact assessment
AQRV	air-quality-related value
ASCE	American Society of Civil Engineers
ASIL	acceptable source impact level
BACT	best available control technology
BMP	best management practices
BPA	Bonneville Power Administration
CARB	California Air Resources Board
CEC	California Energy Commission
CEM	continuous emission monitoring
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
CO	carbon monoxide
CRGNSA	Columbia River Gorge National Scenic Area
CSZ	Cascadia Subduction Zone
CT	combustion turbine
CTG	combustion turbine generator
D/FD	Duke/Fluor-Daniel
DLN	dry low-NO _x
dB(A)	A-weighted decibel
DNR	Washington State Department of Natural Resources
DWI	driving while impaired
Ecology	Washington State Department of Ecology
EDNA	environmental designation for noise abatement
EFSEC	Energy Facility Site Evaluation Council
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
EPC	engineering, procurement, and construction
ESA	Endangered Species Act
F	Fahrenheit
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FGR	flue gas recirculation
FIRE	Factor Information Retrieval
FITR	fuel injection timing retard
FLM	federal land manager
FPD	Fire Prevention District
FSAR	Final Safety Analysis Report
g	gravity
GE	General Electric

ABBREVIATIONS AND ACRONYMS (Continued)

GEP	good engineering practice
gpm	gallons per minute
HAL	high-accident location
HCM	Highway Capacity Manual
HCS	highway capacity software
HRSG	heat recovery steam generator
IES	Illuminating Engineering Society
IWQAM	Interagency Workgroup on Air Quality Modeling
K	erodibility factor
kJ	kilojoule
kW-hr	kilowatt-hour
km	kilometer
kV	kilovolt
LAER	lowest achievable emission rate
LCCD	Lewis County Conservation District
L _{eq}	equivalent sound measure
LOS	level of service
M	magnitude
MCE	maximum credible earthquake
MHHW	mean higher high water
MM5	Mesoscale Model
MMBtu	million British thermal units
MSDS	Material Safety Data Sheet
MSL	mean sea level
MV	megavolt
MVA	megavolt (average)
MW	megawatt
NAAQS	National Ambient Air Quality Standards
NDE	non-destructive examination
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NMFS	National Marine Fisheries Service
NOC	Notice of Construction
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NPSH	net positive suction head
NSPS	New Source Performance Standard
NSR	New Source Review
NWPC	Northwest Pipeline Company
NWS	Northwest Weather Service
OAPCA	Olympic Air Pollution Control Agency
OSHA	Occupational Safety and Health Administration

ABBREVIATIONS AND ACRONYMS (Continued)

PAC	parallel condensing (wet/dry) cooling
PDA	Public Development Authority
PGA	peak ground acceleration
PGU	power generation unit
PHS	Priority Habitat and Species
PM	particulate matter
PMF	probable maximum flood
ppb	parts per billion
ppm	parts per million
ppmvd	parts per million by volume, dry
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PUD	Public Utility District
PWHT	post-weld heat treatment
QA/QC	quality assurance/quality control
RACT	reasonably achievable control technology
RBLC	RACT/BACT/LAER Clearinghouse
RCP	resource contingency program
RCRA	Resource Conservation and Recovery Act
RCW	Revised Code of Washington
RH	relative humidity
ROW	right-of-way
SCA	Site Certification Agreement
SCR	selective catalytic reduction
SIC	Standard Industrial Classification
SIL	significant impact level
SNCR	selective non-catalytic reduction
SOC	Species of Concern
SPCC	Spill Prevention Control and Countermeasures
SQER	small quantity emission rate
SR 12	State Route 12
SSC	steam surface condenser
STG	steam turbine generator
SWPPP	Stormwater Pollution Prevention Plan
TAP	toxic air pollutant
T-BACT	best available control technology for toxics
TDML	total maximum daily load
TEFC	totally enclosed fan-cooled
UBC	Uniform Building Code
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UW	University of Washington

ABBREVIATIONS AND ACRONYMS (Continued)

V	volt
VFITR	variable fuel injection timing retard
WAAQS	Washington Ambient Air Quality Standards
WAC	Washington Administrative Code
WARIS	Washington Rivers Information System
WNP-3	Washington Nuclear Project Unit 3
WNP-5	Washington Nuclear Project Unit 5
WPPSS	Washington Public Power Supply System
WRIA	Water Resources Inventory Area
WSDOT	Washington State Department of Transportation