CALPINE CORPORATION

PASTORIA ENERGY FACILITY, LLC
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September 27, 2013

Mary Dyas
Compliance Project Manager
Siting, Transmission and Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Re: Pastoria Energy Facility (99-AFC-7C)
Petition to Amend Air Quality Conditions of Certification

Dear Ms. Dyas:

Enclosed please find a copy of a Petition to Amend air quality conditions of certification for the Pastoria Energy Facility. An application for permit amendment was filed with the San Joaquin Valley Air Pollution Control District on April 15, 2013. A final Authority to Construct was issued August 20, 2013.

If you have any questions regarding the proposed amendment, please feel free to call me at (925) 570-0849.

Sincerely,

Barbara McBride

Enclosures

Petition to Amend Air Quality Conditions of Certification for the Pastoria Energy Facility

Submitted to:

California Energy Commission

Prepared by

Pastoria Energy Facility, LLC

September 2013

Petition to Amend Air Quality Conditions of Certification for the Pastoria Energy Facility

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ACRONYMS

AFC	Application for Certification
CEC	California Energy Commission
CTG	combustion turbine generator
HRSG	heat recovery steam generator
LORS	Laws, Ordinances, Regulations, and Standards
MW	megawatt
PEF	Pastoria Energy Facility, LLC
ppmc	parts per million, corrected to 15% O_2
SJVAPCD	San Joaquin Valley Air Pollution Control District

Executive Summary

Pastoria Energy Facility LLC, as project owner, petitions the California Energy Commission (CEC or Commission) to amend the certification for the Pastoria Energy Facility (99-AFC-7), issued December 20, 2000. This Amendment includes the following:

- Modification of Condition of Certification AQ-16 to eliminate the one-hour carbon monoxide (CO) concentration limit of 25 ppmc for the natural gas-fired combustion turbine generators that becomes effective two hours after a turbine startup.

Section 1 provides an overview of the Amendment and a review of the ownership of the project. Section 2 provides a complete description of the proposed modifications and the necessity for the proposed changes. Section 3 assesses the potential environmental effects of the proposed changes; the project's continued compliance with all laws, ordinances, regulations and standards (LORS); and the consistency of the changes with the Commission Decision (Decision) certifying the facility. This assessment indicates that adoption of the Amendment will not result in any significant, unmitigated adverse environmental impacts, and that the project will continue to comply with all applicable LORS. Section 4 addresses potential effects on the public, and Section 5 assesses potential effects on property owners. Section 6 provides the requested changes to Condition of Certification AQ-16.

1. Introduction

1.1 Overview

The Pastoria Energy Facility (PEF) is a 750 MW (nominal) power plant consisting of three combined cycle natural gas fired F-class combustion turbine generators (CTG), three heat recovery steam generators (HRSG), two steam turbine generators (STG), two cooling towers, a high voltage switchyard, other power generation equipment, and auxiliary facilities. The project is owned and operated by Pastoria Energy Facility LLC to provide electrical energy to the Southern California market. The California Energy Commission (CEC) issued a license for PEF on December 20, 2000.[1]

By this Amendment, PEF LLC petitions the Commission to amend the certification for the project as follows:

- Modify Condition of Certification AQ-16 in the PEF license to eliminate the one-hour CO concentration limit of 25 ppmc for the natural gas-fired combustion turbine generators that becomes effective two hours after a turbine startup.

During startups, CO emissions are elevated above normal, controlled levels while the gas turbine is being brought up to full load and the emissions control system becomes fully effective. PEF LLC has found that under cold start conditions, low-load CO emissions are higher than expected and the emission controls (dry low-NOx combustors in each CTG) take longer than expected to reach full control efficiency. Therefore, CO emissions during some cold startups are higher and are elevated longer than the two hours anticipated when the Final Decision for the PEF was received in December 2000. As a result, the gas turbine cannot consistently comply with the current hourly CO concentration limit that becomes effective two hours after a turbine startup.

On April 15, 2013, PEF LLC submitted these changes to the San Joaquin Valley Air Pollution Control District (SJVAPCD) in an Application for Minor Modification to the air permits for the PEF (Permit Nos. S-3636-1-4, '-2-4 and '-3-4). On August 20, 2013, PEF LLC received a final Authority to Construct/Certificate of Conformity from SJVAPCD approving the modification. A copy of the permit is provided as Attachment A.

In order to comply with the requirements of the PEF certificate regarding post-certification changes and Section 1769 of the Commission's siting regulations, 20 CCR § 1001 et seq. (Siting Regulations), PEF LLC is submitting this detailed description of the proposed amendments to the Commission. This Amendment contains all of the information required pursuant to Section 1769 of the Siting Regulations.

[1] PEF was originally owned by Enron North America Corporation. The Commission approved the transfer of ownership to PEF LLC in June 2001.

1.2 Summary of Environmental Impacts

Section 1769(a)(1)(E) of the Commission's Siting Regulations requires an analysis of the impacts, if any, that a proposed modification in project design, operation, or performance requirements may have on the environment, and proposed measures to mitigate any significant adverse impacts. Section 1769(a)(1)(F) of the Siting Regulations also requires a discussion of the impact of the modification on the facility's ability to comply with LORS.

As discussed below in Section 3.0, the proposed change is a minor modification of the air quality Conditions of Certification. PEF concludes that the proposed change will have no significant environmental impacts. With respect to the impact of the proposed modifications on applicable laws, ordinances, regulations and standards, the modification of AQ-16 will have no impact on compliance with all applicable LORS.

2. Description of Project Changes

Consistent with Sections 1769(a)(1)(A) and (B) of the Siting Regulations, this section includes a complete description of the proposed modification as well as a discussion of the necessity for the proposed amendment. Consistent with Section 1769(a)(1)(C) and (D) of the Siting Regulations, this section explains that PEF LLC was unaware of the need for this minor modification prior to certification of PEF, and that the modification is not based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision.

2.1 Condition of Certification AQ-16

The CEC Final Decision (99-AFC-7) included a CO emission limit of 25 ppmv at 15% O_2 two hours after the turbine's initial firing (Condition AQ-16); this limit was intended to ensure compliance with District Rule 4703. District Rule 4703 provides flexibility to a turbine operator under specified conditions, and with the prior approval of the District. Condition AQ-16 does not afford that same flexibility. Experience with gas turbine cold startups[2] indicates that the 25 ppm CO limit cannot reliably be achieved within two hours during cold starts. The limit can, however, be achieved within three hours of the initiation of the cold start. Consequently, PEF LLC is proposing to modify condition AQ-16 to eliminate the 25 ppm concentration limit on CO emissions, as the Commission already imposes a limit of 6 ppmc beginning three hours after a startup (Condition AQ-17). The proposed amendment will not change any other hourly limits or any daily or annual emission limits for the gas turbines; these include the maximum allowable CO emissions during a startup (AQ-15), and the maximum allowable CO emissions following a startup (AQ-17).

[2] Cold startup means a startup when the combustion turbine has not been in operation during the preceding 72 hours.

The need for the higher CO emission limit during cold startups after two hours of initial firing was not known during the CEC licensing process for the PEF Project.

3. Environmental Analysis of the Project Changes

Consistent with Sections 1769(a)(1)(E) and (F), the environmental impact and the impact on LORS of the proposed modification of Condition of Certification AQ-16 are addressed below. For the reasons detailed in this section, the proposed change to the PEF Air Quality Conditions of Certification will not have a significant impact on air quality or any other significant environmental impact or effect on LORS. The revised hourly CO concentration limit during startup periods will not result in increases in maximum daily, quarterly, or annual CO emissions, due to the remaining CO emission limits imposed by the Commission. No changes in those permitted limits are being requested.

The following disciplines will not be affected by the proposed changes in this amendment and are not addressed below: Biology, Soils, Geologic Resources and Hazards, Hazardous Materials Management, Land Use, Noise and Vibration, Paleontologic Resources, Public Health, Socioeconomics, Traffic and Transportation, Visual Resources, Waste Management, Water Resources, and Worker Safety and Fire Protection.

3.1 Air Quality

PEF LLC is only requesting that the 25 ppm CO concentration limit that applies two hours following a startup be removed; no changes to other hourly or per-startup limits, or to any daily or annual emission limits for the gas turbines, are requested. This change in Condition of Certification AQ-16 is not expected to have any significant impact on air quality, and no LORS will change as a result of the proposed permit change.

3.1.1 Compliance with SJVAPCD Rule 4703

Since the proposed duration of the cold startups (for purposes of the 25 ppm concentration limit) will exceed the two-hour startup time specified in Section 5.3.1.1 of SJVAPCD Rule 4703, the facility must provide justification and supporting information regarding the reason the exemption is needed to meet the requirements of Section 5.3.3. The required justification is provided in this section.

Section 5.3.3 states that at a minimum, a justification for the increased duration of startups shall include the items outlined below.

A clear identification of the control technologies or strategies to be utilized

The control technologies and strategies utilized to minimize emissions during the startup period are listed below.

- GE 7FA gas turbine technology;
- Dry low-NOx combustors in each CTG;
- SCR in each HRSG;
- Good combustion practices;
- Upon startup, the ammonia injection upstream of each SCR catalyst is started as soon as the catalyst and ammonia injection system warm to their minimum operating temperatures, as specified by the SCR vendor; and
- As soon as system and equipment temperatures and pressures allow, the gas turbine load is increased to approximately 100 MW to reduce CO and NOx emissions production.

A description of what physical conditions prevail during the period that prevent the controls from being effective

The combined-cycle equipment startup duration depends on how fast the high pressure steam drum and steel walls of each steam turbine can be warmed to operating temperature without generating stress cracks or otherwise damaging the equipment. During a cold startup, in which a CTG/HRSG have been shut down for more than 72 hours, the HRSG and steam turbine parts are at ambient temperature and there is a great deal of thermal mass that must be heated. Once the high-pressure steam drum is heated, steam developed in the HRSG from the heated turbine exhaust is admitted into the steam turbine at a controlled temperature to heat it as rapidly as possible without causing stress cracking or differential thermal growth between the steam turbine rotor and casings. The steam temperature is controlled by limiting the load on the gas turbine. At lower load points, the gas turbines are tuned for combustion stability and not for emissions performance, so emissions at low loads are much higher than emissions at typical operating loads (above about 50%). The allowable rate of temperature increase at the steam turbine is the limiting factor in determining how quickly each gas turbine can achieve higher loads. This, in turn, limits how quickly each gas turbine can be brought up to its minimum load point, and this latter step is necessary for the unit to be able to comply with the 25 ppm limit of Rule 4703.

A reasonably precise estimate as to when the physical conditions will have reached a state that allows for the effective control of emissions

PEF has determined that the 25 ppm CO limit of Section 5.3.1.3 cannot be achieved within two hours during cold starts. The limit can be achieved by the end of the cold start period, within three hours.

A detailed list of activities to be performed during the period and a reasonable explanation for the length of time needed to complete each activity

The list of activities to be performed during the startup period is provided under item 1 above. In PEF's experience, these activities cannot consistently be completed in under three hours following a cold start.

A description of the material process flow rates and system operating parameters the operator plans to evaluate during the process optimization, and an explanation of how the activities and process flow affect the operation of the emissions control equipment

The startup duration depends on the allowable ramp rate of the steam temperature to the steam turbine, which depends on the acceptable rate of increase of the metal temperature of the hot reheat and HP steam bowls at the steam turbine inlets. The maximum steam temperature is set by applying an allowable differential above the metal temperature. The differential is determined by the steam turbine supplier, and is imposed by the supplier's control system to avoid damage to the steam turbine from thermal stress and to avoid turbine rotor to casing rotational contact due to differences in thermal growth between rotor and casings. The control system limits gas turbine load to control the steam temperature. Any manual override of the gas turbine load limit by the operator reduces the life expectancy of the steam turbine.

As discussed above, at the lower load points, each gas turbine is tuned for combustion stability and not for emissions performance, so emissions at low loads are much higher than emissions at typical operating loads (above about 50%). The allowable rate of temperature increase at the steam turbine is the limiting factor in determining how quickly the gas turbine can achieve higher loads. This, in turn, limits how quickly the gas turbine can be brought up to its minimum load point and how soon CO emissions can be reduced below 25 ppm.

The basis for the requested additional duration

The description of activities above, steam turbine manufacturer starting and loading procedures, and PEF's operating experience demonstrates that the time required for each gas turbine/HRSG consistently to meet the 25 ppm limit of District Rule 4703, Section 5.3.1.1, under cold start conditions is three hours.

3.1.2 Ambient Air Quality Impact Assessment

In December 2004, PEF prepared an ambient air quality impact assessment for CO during cold startups. At the request of EPA Region 9, the 2004 assessment used conservative screening modeling techniques (CTSCREEN model, screening meteorology). These modeling results can be used as a basis for assessing the potential impacts of the proposed increase in allowable CO emissions during cold startup.

The 2004 analysis assumed that one turbine would be in startup and two turbines would be operating at full load.[3] Maximum emission rates for the turbine undergoing startup were as follows:

CO (1-hour average): 1,235 lb/hr[4] (maximum allowable startup emission rate)
CO (8-hour average): 337.3 lb/hr (2 hours at 1,235 lb/hr; 1 hour at 25 ppm [per condition 16]; 5 hours at the maximum hourly CO emission rate of 24.92 lb/hr)

Stack parameters for the turbine in startup reflected 60 percent load operation (the minimum load for which turbine performance data was available).

Because the maximum hourly emission rate for a gas turbine in cold startup will not change under the proposed amendment, there will be no change in the maximum one-hour average impact of 2,104 $\mu g/m^3$, as determined in the 2004 modeling analysis. However, the 8-hour average impact of 301 $\mu g/m^3$ will change, as the 8-hour average emission rate for the turbine undergoing startup will increase as follows:

CO (8-hour average): 3 hours at 1,234 lb/hr; 5 hours at the maximum hourly CO emission rate of 24.92 lb/hr = 478.3 lb/hr

Since only one gas turbine at a time will be in startup, the simple scaling analysis shown below using χ/Q will conservatively overestimate the 8-hour average CO impacts after the proposed modification:[5]

$$478.3 \text{ lb}/337.3 \text{ lb} * 301 \ \mu g/m^3 = 427 \ \mu g/m^3$$

The CO modeling results, shown below in Table 1, indicate no exceedances of the state or federal Ambient Air Quality Standards at the higher emission rate.

Because the maximum hourly emission rate for a gas turbine in cold startup will not change under the proposed amendment, there will be no increases in daily, quarterly, or annual CO emission limits.

3.1.1 Mitigation

PEF will continue to minimize the amount of time that the gas turbine operates with elevated CO emissions by completing startups as quickly as possible.

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[3] This is consistent with the SJVAPCD's Condition 11, which requires that only one of the three gas turbines be in startup at any one time.

[4] SJVAPCD's Condition 13 limits CO emissions during startup to 1,235 lb/hr, while EPA's PSD permit condition G.1 limits CO emissions during startup to 1,234 lb/hr. The ambient air quality modeling analysis performed for the District permit used the slightly higher emission rate; however, the slightly lower PSD limit governs as it is more stringent.

[5] This scaling approach is conservative because it assumes a proportional increase in CO emissions from the two gas turbines at 100% load as well as from the gas turbine in startup, when only the startup emissions will increase.

Table 1 Revised Modeled Maximum Impacts During Startup of One CTG/HRSG						
Pollutant	Averaging Time	Maximum Facility Impact (µg/m3)	Background (µg/m3)	Total Impact (µg/m3)	State Standard (µg/m3)	Federal Standard (µg/m3)
CO	1-hour	2,104	4,375	6,479	23,000	40,000
	8-hour	427	2,755	3,182	10,000	10,000

Note: Background concentrations are highest of 2008-2010 readings at the Bakersfield Golden State Hwy monitoring station.

4. Potential Effects on the Public

Consistent with Section 1769(a)(1)(G) of the Siting Regulations, this section discusses the proposed project modification effects on the public. The proposed minor modifications to Condition of Certification AQ-16 proposed in this Amendment will have no significant impacts on the environment, and will be in compliance with all applicable LORS and Conditions of Certification. Accordingly, there will be no adverse impacts on the public associated with this Amendment.

5. Potential Effects on Nearby Property Owners

As required by the CEC Siting Regulations §1769(a)(1)(H), a list of property owners potentially affected by the proposed modification is provided.

- Tejon Ranch

Insofar as the proposed minor modifications to Condition of Certification AQ-16 will have no significant impacts on the environment, and will be in compliance with all applicable LORS and Conditions of Certification, the Amendment will have no impact on any property owners. Tejon Ranch is the sole landowner identified for the facility. No additional landowners are located within 500 feet of the facility.

6. Proposed Modifications to the Conditions of Certification

Consistent with the requirements of the CEC Siting Regulations Section 1769 (a)(1)(A), this section addresses the proposed modifications to the Project's Conditions of Certification.

The proposed revisions to Condition of Certification AQ-16 are presented below.

AQ-16 By two hours after turbine initial firing, CTG exhaust emissions shall not exceed ~~any of the following~~: NOx (as NO_2) - 12.2 ppmv @ 15% O_2 ~~and CO - 25 ppmv @ 15% O_2~~. [District Rule 4703]

Verification: The project owner shall provide records of compliance as part of the quarterly reports of **Condition AQ-39.**

Attachment A

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUG 20 2013

Mike Rinehart
Pastoria Energy Facility, LLC
PO Box 866
Lebec, CA 93243

RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)
Facility Number: S-3636
Project Number: S-1131632

Dear Mr. Rinehart:

The Air Pollution Control Officer has issued the Authority to Construct permits to Pastoria Energy Facility, LLC for to modify three gas turbine permits by removal of a redundant startup duration limitation., at Tejon Ranch 30 miles south of Bakersfield and 6.5 miles east of Grapevine Rancho El Tejon.

Enclosed are the Authority to Construct permits, invoice, and engineering evaluation with attachments. The District's analysis of the proposal was sent to US EPA Region IX on 7/8/13. All comments received have been addressed by the District. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

DW:dbt

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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4800 Enterprise Way
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AIR POLLUTION CONTROL DISTRICT

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AUTHORITY TO CONSTRUCT

PERMIT NO: S-3636-1-5 **ISSUANCE DATE:** 08/15/2013

LEGAL OWNER OR OPERATOR: PASTORIA ENERGY FACILITY, LLC
MAILING ADDRESS: 39789 EDMONSTON PUMPING PLANT RD
PO BOX 866
LEBEC, CA 93243-0866

LOCATION: TEJON RANCH 30 MILES S OF BAKERSFIELD
AND 6.5 MILES E OF GRAPEVINE
RANCHO EL TEJON, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF 168 MW NOMINALLY RATED GENERAL ELECTRIC 7FA NATURAL GAS FIRED GAS TURBINE ENGINE/ELECTRICAL GENERATOR #1 WITH DRY LOW NOX COMBUSTORS AND SELECTIVE CATALYTIC REDUCTION, WITH HRSG #1 AND 185 MW STEAM TURBINE #1 IN A TWO ON ONE COMBINED CYCLE WITH GAS TURBINE ENGINE S-3636-2: REMOVE REDUNDANT LIMITATION ON STARTUP DURATION

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Combustion turbine and electrical generator lube oil vents shall be equipped with mist eliminators to maintain visible emissions from lube oil vents no greater than 5% opacity, except for three minutes in any hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Combustion turbine engine(GTE) shall be equipped with continuously recording fuel gas flowmeter. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-3636-1-5 : Aug 15 2013 10:16AM -- TORID : Joint Inspection NOT Required

5. Heat recovery steam generator (HRSG) exhaust duct downstream of the SCR unit shall be equipped with continuously recording emissions monitors (CEM) for NOx, CO, and O2. All CEMs shall be dedicated to this unit and shall meet the requirements of 40 CFR Part 60 Appendices B & F (for CO), and 40 CFR Part 75 (for NOx and O2), and shall be capable of monitoring emissions during normal operating conditions and during startups and shutdowns, provided the CEM(s) pass the relative accuracy requirements for startups and shutdown specified herein. If relative accuracy of CEM(s) cannot be certified during startup conditions, CEM results during startup and shutdown events shall be replaced with startup emission rates obtained during source testing to determine compliance with emission limits in conditions 13, 17 and 18. [District Rule 2201 and PSD Permit (SJ 99-03) X.H.1] Federally Enforceable Through Title V Permit

6. HRSG exhaust duct shall be equipped with a continuously recording emission monitor upstream of the SCR unit for measuring the NOx concentration for the purposes of calculating ammonia slip. Permittee shall check, record, and quantify the calibration drift (CD) at two concentration values at least once daily (approximately 24 hours). The calibration shall be adjusted whenever the daily zero or high-level CD exceeds 5%. If either the zero or high-level CD exceeds 5% for five consecutive daily periods, the analyzer shall be deemed out-of-control. If either the zero or high-level CD exceeds 10% during any CD check, analyzer shall be deemed out-of-control. If the analyzer is out-of-control, the permittee shall take appropriate corrective action and then repeat the CD check. [District Rule 2201] Federally Enforceable Through Title V Permit

7. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit

8. Exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.3] Federally Enforceable Through Title V Permit

9. Heat recovery steam generator design shall provide space for additional selective catalytic reduction catalyst and oxidation catalyst if required to meet NOx and CO emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

10. Permittee shall monitor and record exhaust gas temperature at selective catalytic reduction and oxidation catalyst inlets. [District Rule 2201] Federally Enforceable Through Title V Permit

11. GTE shall be fired exclusively on natural gas, consisting primarily of methane and ethane, with a sulfur content no greater than 0.75 grains of sulfur compounds (as S) per 100 dry scf of natural gas. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

12. Cold startup is defined as the period beginning with turbine initial firing until the unit meets the lb/hr and ppmv emission limits in condition 15. Cold startup means a startup when the combustion turbine has not been in operation during the preceding 72 hours. Duration of the cold startups shall not exceed 3 hours. [District Rules 2201 and 4703 and PSD Permit (SJ 99-03) X.G.5] Federally Enforceable Through Title V Permit

13. Only one of GTEs S-3636-1, '2 or '3 shall be in startup at any one time. [District Rule 2201 and PSD Permit (SJ 99-03) X.G.2] Federally Enforceable Through Title V Permit

14. Ammonia shall be injected when the selective catalytic reduction system catalyst temperature exceeds 500 degrees F. Permittee shall monitor and record catalyst temperature during periods of startup. [District Rule 2201] Federally Enforceable Through Title V Permit

15. During the cold startup GTE exhaust emissions shall not exceed any of the following: NOx (as NO2) - 130 lb, VOC - 273 lb or CO - 1235 lb, in any one hour. [District Rule 2201 and PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

16. Emission rates from GTE, except during startup and/or shutdown, shall not exceed any of the following: NOx (as NO2) - 17.03 lb/hr and 2.5 ppmvd @ 15% O2, VOC - 2.0 ppmvd @ 15% O2, CO - 24.92 lb/hr and 6 ppmvd @ 15% O2 or ammonia - 10 ppmvd @15% O2. NOx (as NO2) emission limit is a one-hour average. Ammonia emission limit is a twenty-four hour rolling average. All other emission limits are three-hour rolling averages. [District Rules 2201, 4703 and PSD Permit (SJ 99-03) X.D & .E] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. Emission rates from the GTE shall not exceed either of the following: PM10 - 9.0 lb/hr and SOx (as SO2) - 3.495 lb/hr. Emission limits are three-hour rolling averages. [District Rules 2201, 4001, and PSD Permit (SJ 99-03) X.F] Federally Enforceable Through Title V Permit

18. On any day when a startup or shutdown occurs, emission rates from GTE shall not exceed any of the following: PM10 - 216 lb/day, SOx (as SO2) - 84 lb/day, NOx (as NO2) - 450 lb/day, VOC - 355 lb/day or CO - 2,113 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

19. Combined annual emissions from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following: PM10 - 224,343 lb/year , SOx (as SO2) - 84,780 lb/year, NOx (as NO2) - 344,484 lb/year, VOC - 227,619 lb/year or CO - 1,220,166 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

20. Combined annual emissions of all hazardous air pollutants (HAPS) from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed 25 tons/year. Combined annual emissions of any single HAP from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed 10 tons/year. [District Rule 4002] Federally Enforceable Through Title V Permit

21. Each one-hour period shall commence on the hour. Each one-hour period in a three-hour rolling average will commence on the hour. The three-hour average will be compiled from the three most recent one-hour periods. Each one-hour period in a twenty-four-hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve-consecutive-month rolling average emissions shall commence at the beginning of the first day of the month. The twelve-consecutive-month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 = ((a-(bxc/1,000,000)) x 1,000,000 / b) x d, where a = ammonia injection rate(lb/hr)/17(lb/lb. mol), b = dry exhaust gas flow rate (lb/hr)/(29(lb/lb. mol), c = change in measured NOx concentration ppmv at 15% O2 across catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip. Alternatively, permittee may utilize a continuous in-stack ammonia monitor, acceptable to the District, to monitor compliance. At least 60 days prior to using a NH3 CEM, the permittee must submit a monitoring plan for District review and approval. [District Rule 4102]

24. Compliance with the short term emission limits (ppmv @ 15% O2 and lb/hr) shall be demonstrated annually by District witnessed in situ sampling of exhaust gases by a qualified independent source test firm at full load conditions as follows - NOx: ppmvd @ 15% O2 and lb/hr, CO: ppmvd @ 15% O2 and lb/hr, VOC: ppmvd @ 15% O2 and lb/hr, PM10: lb/hr, and ammonia: ppmvd @ 15% O2. Sample collection to demonstrate compliance with ammonia emission limit shall be based on three consecutive test runs of thirty minutes each. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.1] Federally Enforceable Through Title V Permit

25. Compliance with the startup NOx, CO, and VOC mass emission limits shall be demonstrated for one of the GTEs (S-3636-1, '2, or '3) at least once every seven years by District witnessed in situ sampling of exhaust gases by a qualified independent source test firm. CEM relative accuracy shall be determined during startup source testing in accordance with methodology approved by the District. If CEM data is not certifiable to determine compliance with NOx and CO startup emissions limits, then source testing to measure startup NOx and CO mass emissions rates shall be conducted at least once every 12 months. [District Rule 1081] Federally Enforceable Through Title V Permit

26. Based on the initial speciated HAPS and total VOC source test conducted for one of the GTEs (S-3636-1, '2 or '3), Pastoria shall correlate the total HAPS emissions rate and the single highest HAP emission rate to the VOC mass emission determined during the speciated HAPs source test. Annual compliance with the HAPS emissions limit (25 tpy all HAPS or 10 tpy any single HAP) shall be by the combined VOC emissions rates for the GTEs (S-3636-1, '2 and '3) determined during annual compliance source testing and the correlation between VOC emissions and HAP(S). [District Rule 4002] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

27. Compliance with natural gas sulfur content limit shall be demonstrated periodically as required by 40 CFR 60 Subpart GG and 40 CFR 75. [District Rules 2540 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

28. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. Official test results and field data collected by source tests required by conditions on this permit shall be submitted to the District within 60 days of testing. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.2] Federally Enforceable Through Title V Permit

29. Source test plans for seven-year source tests shall include a method for measuring the VOC/CO surrogate relationship that will be used to demonstrate compliance with VOC lb/hr, lb/day, and lb/twelve month rolling emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

30. The following test methods shall be used PM10: EPA method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 4001, 4703, and PSD Permit (SJ 99-03) X.C.2] Federally Enforceable Through Title V Permit

31. The permittee shall maintain hourly records of NOx, CO, and ammonia emission concentrations (ppmv @ 15% O2), and hourly, daily, and twelve month rolling average records of NOx and CO emissions. Compliance with the hourly, daily, and twelve month rolling average VOC emission limits shall be demonstrated by the CO CEM data and the VOC/CO relationship determined by annual CO and VOC source tests. [District Rule 2201] Federally Enforceable Through Title V Permit

32. The permittee shall maintain records of SOx lb/hr, lb/day, and lb/twelve month rolling average emission. SOx emissions shall be based on fuel use records, natural gas sulfur content, and mass balance calculations. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

33. Permittee shall maintain the following records for the GTE: occurrence, duration, and type of any startup, shutdown, or malfunction; performance testing; emission measurements; total daily and rolling twelve month average hours of operation; hourly quantity of fuel used and gross three hour average operating load. [District Rules 2201 & 4703] Federally Enforceable Through Title V Permit

34. Permittee shall maintain the following records for the continuous emissions monitoring system (CEMS): performance testing, evaluations, calibrations, checks, maintenance, adjustments, and any period during which a CEMS was inoperative. [District Rules 2201 & 4703, and PSD Permit (SJ 99-03) X.I.1] Federally Enforceable Through Title V Permit

35. Permittee shall provide notification and record keeping as required under 40 CFR, Part 60, Subpart A, 60.7. [District Rule 4001] Federally Enforceable Through Title V Permit

36. All records required to be maintained by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

37. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3. 3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit

38. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit

39. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. The permittee shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080 and PSD Permit (SJ 99-03) X.I.3] Federally Enforceable Through Title V Permit

41. The combined annual emissions rate from all three CTGs and emergency engines S-3636-7-4 & -12-1, based on 12-month rolling average, must not exceed 344,485 lbs NOx and 1,140,000 lbs CO. [PSD Permit (SJ 99-03) X.D & .E] Federally Enforceable Through Title V Permit

42. The annual SOx emissions from each CTG, based on 12-month rolling average, must not exceed 28,170 lbs. [PSD Permit (SJ 99-03) X.F] Federally Enforceable Through Title V Permit

43. During the hot startup of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 107 lbs of NOx or 903 lbs of CO in any one hour. Hot startup means a startup when the combustion turbine has been in operation during the preceding 8 hours and duration of hot start-ups shall not exceed 1 hour. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

44. During the warm startup of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 119 lbs of NOx or 1021 lbs of CO in any one hour. Warm startup means a startup that is not a hot or cold startup and duration of warm startups shall not exceed 2.5 hours. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

45. During the Shutdown of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 58.5 lbs of NOx or 222.5 lbs of CO in any one hour. Shutdown shall be defined as the period beginning with the lowering of equipment from base load and lasting until fuel flow is completely off and combustion has ceased and duration of shutdowns shall not exceed one half hour. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

46. Total number of start-ups and shut-downs for the facility shall not exceed 674 events per year. [PSD Permit (SJ 99-03) X.G.6] Federally Enforceable Through Title V Permit

47. Any excess emission indicated by the CEM system must be considered a violation of the applicable emission limit in the PSD permit. [PSD Permit (SJ 99-03) X.I.4] Federally Enforceable Through Title V Permit

48. The quality assurance project plan used by the Permittee for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 CFR Part 60, Appendix F, must be available upon request to EPA. [PSD Permit (SJ 99-03) X.I.5] Federally Enforceable Through Title V Permit

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-3636-2-5 **ISSUANCE DATE:** 08/15/2013

LEGAL OWNER OR OPERATOR: PASTORIA ENERGY FACILITY, LLC
MAILING ADDRESS: 39789 EDMONSTON PUMPING PLANT RD
PO BOX 866
LEBEC, CA 93243-0866

LOCATION: TEJON RANCH 30 MILES S OF BAKERSFIELD
AND 6.5 MILES E OF GRAPEVINE
RANCHO EL TEJON, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF 168 MW NOMINALLY RATED GENERAL ELECTRIC 7FA NATURAL GAS FIRED GAS TURBINE ENGINE/ELECTRICAL GENERATOR #2 WITH DRY LOW NOX COMBUSTORS, SELECTIVE CATALYTIC REDUCTION, HRSG #2, AND A SINGLE 185 MW STEAM TURBINE #1 SHARED WITH GAS TURBINE ENGINE S-3636-1: REMOVE REDUNDANT LIMITATION ON STARTUP DURATION

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Combustion turbine and electrical generator lube oil vents shall be equipped with mist eliminators to maintain visible emissions from lube oil vents no greater than 5% opacity, except for three minutes in any hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Combustion turbine engine(GTE) shall be equipped with continuously recording fuel gas flowmeter. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

for DAVID WARNER, Director of Permit Services

S-3636-2-5 : Aug 15 2013 10:56AM - HUBBIT : Joint inspection NOT Required

5. Heat recovery steam generator (HRSG) exhaust duct downstream of the SCR unit shall be equipped with continuously recording emissions monitors (CEM) for NOx, CO, and O2. All CEMs shall be dedicated to this unit and shall meet the requirements of 40 CFR Part 60 Appendices B & F (for CO), and 40 CFR Part 75 (for NOx and O2), and shall be capable of monitoring emissions during normal operating conditions and during startups and shutdowns, provided the CEM(s) pass the relative accuracy requirements for startups and shutdown specified herein. If relative accuracy of CEM(s) cannot be certified during startup conditions, CEM results during startup and shutdown events shall be replaced with startup emission rates obtained during source testing to determine compliance with emission limits in conditions 13, 17 and 18. [District Rule 2201 and PSD Permit (SJ 99-03) X.H.1] Federally Enforceable Through Title V Permit

6. HRSG exhaust duct shall be equipped with a continuously recording emission monitor upstream of the SCR unit for measuring the NOx concentration for the purposes of calculating ammonia slip. Permittee shall check, record, and quantify the calibration drift (CD) at two concentration values at least once daily (approximately 24 hours). The calibration shall be adjusted whenever the daily zero or high-level CD exceeds 5%. If either the zero or high-level CD exceeds 5% for five consecutive daily periods, the analyzer shall be deemed out-of-control. If either the zero or high-level CD exceeds 10% during any CD check, analyzer shall be deemed out-of-control. If the analyzer is out-of-control, the permittee shall take appropriate corrective action and then repeat the CD check. [District Rule 2201] Federally Enforceable Through Title V Permit

7. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit

8. Exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.3] Federally Enforceable Through Title V Permit

9. Heat recovery steam generator design shall provide space for additional selective catalytic reduction catalyst and oxidation catalyst if required to meet NOx and CO emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

10. Permittee shall monitor and record exhaust gas temperature at selective catalytic reduction and oxidation catalyst inlets. [District Rule 2201] Federally Enforceable Through Title V Permit

11. GTE shall be fired exclusively on natural gas, consisting primarily of methane and ethane, with a sulfur content no greater than 0.75 grains of sulfur compounds (as S) per 100 dry scf of natural gas. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

12. Cold startup is defined as the period beginning with turbine initial firing until the unit meets the lb/hr and ppmv emission limits in condition 15. Cold startup means a startup when the combustion turbine has not been in operation during the preceding 72 hours. Duration of the cold startups shall not exceed 3 hours. [District Rules 2201 and 4703 and PSD Permit (SJ 99-03) X.G.5] Federally Enforceable Through Title V Permit

13. Only one of GTEs S-3636-1, '2 or '3 shall be in startup at any one time. [District Rule 2201 and PSD Permit (SJ 99-03) X.G.2] Federally Enforceable Through Title V Permit

14. Ammonia shall be injected when the selective catalytic reduction system catalyst temperature exceeds 500 degrees F. Permittee shall monitor and record catalyst temperature during periods of startup. [District Rule 2201] Federally Enforceable Through Title V Permit

15. During the cold startup GTE exhaust emissions shall not exceed any of the following: NOx (as NO2) - 130 lb, VOC - 273 lb or CO - 1235 lb, in any one hour. [District Rule 2201 and PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

16. Emission rates from GTE, except during startup and/or shutdown, shall not exceed any of the following: NOx (as NO2) - 17.03 lb/hr and 2.5 ppmvd @ 15% O2, VOC - 2.0 ppmvd @ 15% O2, CO - 24.92 lb/hr and 6 ppmvd @ 15% O2 or ammonia - 10 ppmvd @15% O2. NOx (as NO2) emission limit is a one-hour average. Ammonia emission limit is a twenty-four hour rolling average. All other emission limits are three-hour rolling averages. [District Rules 2201, 4703 and PSD Permit (SJ 99-03) X.D & .E] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. Emission rates from the GTE shall not exceed either of the following: PM10 - 9.0 lb/hr and SOx (as SO2) - 3.495 lb/hr. Emission limits are three-hour rolling averages. [District Rules 2201, 4001, and PSD Permit (SJ 99-03) X.F] Federally Enforceable Through Title V Permit

18. On any day when a startup or shutdown occurs, emission rates from GTE shall not exceed any of the following: PM10 - 216 lb/day, SOx (as SO2) - 84 lb/day, NOx (as NO2) - 450 lb/day, VOC - 355 lb/day or CO - 2,113 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

19. Combined annual emissions from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following: PM10 - 224,343 lb/year , SOx (as SO2) - 84,780 lb/year, NOx (as NO2) - 344,484 lb/year, VOC - 227,619 lb/year or CO - 1,220,166 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

20. Combined annual emissions of all hazardous air pollutants (HAPS) from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed 25 tons/year. Combined annual emissions of any single HAP from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed 10 tons/year. [District Rule 4002] Federally Enforceable Through Title V Permit

21. Each one-hour period shall commence on the hour. Each one-hour period in a three-hour rolling average will commence on the hour. The three-hour average will be compiled from the three most recent one-hour periods. Each one-hour period in a twenty-four-hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve-consecutive-month rolling average emissions shall commence at the beginning of the first day of the month. The twelve-consecutive-month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 = ((a-(bxc/1,000,000)) x 1,000,000 / b) x d, where a = ammonia injection rate(lb/hr)/17(lb/lb. mol), b = dry exhaust gas flow rate (lb/hr)/(29(lb/lb. mol), c = change in measured NOx concentration ppmv at 15% O2 across catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip. Alternatively, permittee may utilize a continuous in-stack ammonia monitor, acceptable to the District, to monitor compliance. At least 60 days prior to using a NH3 CEM, the permittee must submit a monitoring plan for District review and approval. [District Rule 4102]

24. Compliance with the short term emission limits (ppmv @ 15% O2 and lb/hr) shall be demonstrated annually by District witnessed in situ sampling of exhaust gases by a qualified independent source test firm at full load conditions as follows - NOx: ppmvd @ 15% O2 and lb/hr, CO: ppmvd @ 15% O2 and lb/hr, VOC: ppmvd @ 15% O2 and lb/hr, PM10: lb/hr, and ammonia: ppmvd @ 15% O2. Sample collection to demonstrate compliance with ammonia emission limit shall be based on three consecutive test runs of thirty minutes each. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.1] Federally Enforceable Through Title V Permit

25. Compliance with the startup NOx, CO, and VOC mass emission limits shall be demonstrated for one of the GTEs (S-3636-1, '2, or '3) at least once every seven years by District witnessed in situ sampling of exhaust gases by a qualified independent source test firm. CEM relative accuracy shall be determined during startup source testing in accordance with methodology approved by the District. If CEM data is not certifiable to determine compliance with NOx and CO startup emissions limits, then source testing to measure startup NOx and CO mass emissions rates shall be conducted at least once every 12 months. [District Rule 1081] Federally Enforceable Through Title V Permit

26. Based on the initial speciated HAPS and total VOC source test conducted for one of the GTEs (S-3636-1, '2 or '3), Pastoria shall correlate the total HAPS emissions rate and the single highest HAP emission rate to the VOC mass emission determined during the speciated HAPs source test. Annual compliance with the HAPS emissions limit (25 tpy all HAPS or 10 tpy any single HAP) shall be by the combined VOC emissions rates for the GTEs (S-3636-1, '2 and '3) determined during annual compliance source testing and the correlation between VOC emissions and HAP(S). [District Rule 4002] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

27. Compliance with natural gas sulfur content limit shall be demonstrated periodically as required by 40 CFR 60 Subpart GG and 40 CFR 75. [District Rules 2540 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

28. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. Official test results and field data collected by source tests required by conditions on this permit shall be submitted to the District within 60 days of testing. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.2] Federally Enforceable Through Title V Permit

29. Source test plans for seven-year source tests shall include a method for measuring the VOC/CO surrogate relationship that will be used to demonstrate compliance with VOC lb/hr, lb/day, and lb/twelve month rolling emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

30. The following test methods shall be used PM10: EPA method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 4001, 4703, and PSD Permit (SJ 99-03) X.C.2] Federally Enforceable Through Title V Permit

31. The permittee shall maintain hourly records of NOx, CO, and ammonia emission concentrations (ppmv @ 15% O2), and hourly, daily, and twelve month rolling average records of NOx and CO emissions. Compliance with the hourly, daily, and twelve month rolling average VOC emission limits shall be demonstrated by the CO CEM data and the VOC/CO relationship determined by annual CO and VOC source tests. [District Rule 2201] Federally Enforceable Through Title V Permit

32. The permittee shall maintain records of SOx lb/hr, lb/day, and lb/twelve month rolling average emission. SOx emissions shall be based on fuel use records, natural gas sulfur content, and mass balance calculations. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

33. Permittee shall maintain the following records for the GTE: occurrence, duration, and type of any startup, shutdown, or malfunction; performance testing; emission measurements; total daily and rolling twelve month average hours of operation; hourly quantity of fuel used and gross three hour average operating load. [District Rules 2201 & 4703] Federally Enforceable Through Title V Permit

34. Permittee shall maintain the following records for the continuous emissions monitoring system (CEMS): performance testing, evaluations, calibrations, checks, maintenance, adjustments, and any period during which a CEMS was inoperative. [District Rules 2201 & 4703, and PSD Permit (SJ 99-03) X.I.1] Federally Enforceable Through Title V Permit

35. Permittee shall provide notification and record keeping as required under 40 CFR, Part 60, Subpart A, 60.7. [District Rule 4001] Federally Enforceable Through Title V Permit

36. All records required to be maintained by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

37. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3. 3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit

38. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit

39. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. The permittee shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080 and PSD Permit (SJ 99-03) X.I.3] Federally Enforceable Through Title V Permit

41. The combined annual emissions rate from all three CTGs and emergency engines S-3636-7-4 & -12-41 based on 12-month rolling average, must not exceed 344,485 lbs NOx and 1,140,000 lbs CO. [PSD Permit (SJ 99-03) X.D & .E] Federally Enforceable Through Title V Permit

42. The annual SOx emissions from each CTG, based on 12-month rolling average, must not exceed 28,170 lbs. [PSD Permit (SJ 99-03) X.F] Federally Enforceable Through Title V Permit

43. During the hot startup of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 107 lbs of NOx or 903 lbs of CO in any one hour. Hot startup means a startup when the combustion turbine has been in operation during the preceding 8 hours and duration of hot start-ups shall not exceed 1 hour. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

44. During the warm startup of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 119 lbs of NOx or 1021 lbs of CO in any one hour. Warm startup means a startup that is not a hot or cold startup and duration of warm startups shall not exceed 2.5 hours. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

45. During the Shutdown of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 58.5 lbs of NOx or 222.5 lbs of CO in any one hour. Shutdown shall be defined as the period beginning with the lowering of equipment from base load and lasting until fuel flow is completely off and combustion has ceased and duration of shutdowns shall not exceed one half hour. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

46. Total number of start-ups and shut-downs for the facility shall not exceed 674 events per year. [PSD Permit (SJ 99-03) X.G.6] Federally Enforceable Through Title V Permit

47. Any excess emission indicated by the CEM system must be considered a violation of the applicable emission limit in the PSD permit. [PSD Permit (SJ 99-03) X.I.4] Federally Enforceable Through Title V Permit

48. The quality assurance project plan used by the Permittee for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 CFR Part 60, Appendix F, must be available upon request to EPA. [PSD Permit (SJ 99-03) X.I.5] Federally Enforceable Through Title V Permit

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-3636-3-5 **ISSUANCE DATE:** 08/15/2013

LEGAL OWNER OR OPERATOR: PASTORIA ENERGY FACILITY, LLC
MAILING ADDRESS: 39789 EDMONSTON PUMPING PLANT RD
PO BOX 866
LEBEC, CA 93243-0866

LOCATION: TEJON RANCH 30 MILES S OF BAKERSFIELD
AND 6.5 MILES E OF GRAPEVINE
RANCHO EL TEJON, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF 168 MW NOMINALLY RATED GENERAL ELECTRIC 7FA NATURAL GAS FIRED GAS TURBINE ENGINE/ELECTRICAL GENERATOR #3 WITH DRY LOW NOX COMBUSTORS, SELECTIVE CATALYTIC REDUCTION, HRSG #1 AND 90 MW STEAM TURBINE #2: REMOVE REDUNDANT LIMITATION ON STARTUP DURATION

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Combustion turbine and electrical generator lube oil vents shall be equipped with mist eliminators to maintain visible emissions from lube oil vents no greater than 5% opacity, except for three minutes in any hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Combustion turbine engine(GTE) shall be equipped with continuously recording fuel gas flowmeter. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

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YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-3636-3-5 Aug 15 2013 10:56AM – [illegible] Joint Inspection NOT Required

5. Heat recovery steam generator (HRSG) exhaust duct downstream of the SCR unit shall be equipped with continuously recording emissions monitors (CEM) for NOx, CO, and O2. All CEMs shall be dedicated to this unit and shall meet the requirements of 40 CFR Part 60 Appendices B & F (for CO), and 40 CFR Part 75 (for NOx and O2), and shall be capable of monitoring emissions during normal operating conditions and during startups and shutdowns, provided the CEM(s) pass the relative accuracy requirements for startups and shutdown specified herein. If relative accuracy of CEM(s) cannot be certified during startup conditions, CEM results during startup and shutdown events shall be replaced with startup emission rates obtained during source testing to determine compliance with emission limits in conditions 13, 17 and 18. [District Rule 2201 and PSD Permit (SJ 99-03) X.H.1] Federally Enforceable Through Title V Permit

6. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3. 3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit

7. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit

8. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit

9. The permittee shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080 and PSD Permit (SJ 99-03) X.I.3] Federally Enforceable Through Title V Permit

10. The combined annual emissions rate from all three CTGs and emergency engines S-3636-7-4 & -12-1, based on 12-month rolling average, must not exceed 344,485 lbs NOx and 1,140,000 lbs CO. [PSD Permit (SJ 99-03) X.D & .E] Federally Enforceable Through Title V Permit

11. The annual SOx emissions from each CTG, based on 12-month rolling average, must not exceed 28,170 lbs. [PSD Permit (SJ 99-03) X.F] Federally Enforceable Through Title V Permit

12. During the hot startup of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 107 lbs of NOx or 903 lbs of CO in any one hour. Hot startup means a startup when the combustion turbine has been in operation during the preceding 8 hours and duration of hot start-ups shall not exceed 1 hour. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

13. HRSG exhaust duct shall be equipped with a continuously recording emission monitor upstream of the SCR unit for measuring the NOx concentration for the purposes of calculating ammonia slip. Permittee shall check, record, and quantify the calibration drift (CD) at two concentration values at least once daily (approximately 24 hours). The calibration shall be adjusted whenever the daily zero or high-level CD exceeds 5%. If either the zero or high-level CD exceeds 5% for five consecutive daily periods, the analyzer shall be deemed out-of-control. If either the zero or high-level CD exceeds 10% during any CD check, analyzer shall be deemed out-of-control. If the analyzer is out-of-control, the permittee shall take appropriate corrective action and then repeat the CD check. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit

15. Exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.3] Federally Enforceable Through Title V Permit

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16. Heat recovery steam generator design shall provide space for additional selective catalytic reduction catalyst and oxidation catalyst if required to meet NOx and CO emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

17. Permittee shall monitor and record exhaust gas temperature at selective catalytic reduction and oxidation catalyst inlets. [District Rule 2201] Federally Enforceable Through Title V Permit

18. GTE shall be fired exclusively on natural gas, consisting primarily of methane and ethane, with a sulfur content no greater than 0.75 grains of sulfur compounds (as S) per 100 dry scf of natural gas. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

19. Cold startup is defined as the period beginning with turbine initial firing until the unit meets the lb/hr and ppmv emission limits in condition 15. Cold startup means a startup when the combustion turbine has not been in operation during the preceding 72 hours. Duration of the cold startups shall not exceed 3 hours. [District Rules 2201 and 4703 and PSD Permit (SJ 99-03) X.G.5] Federally Enforceable Through Title V Permit

20. Only one of GTEs S-3636-1, '2 or '3 shall be in startup at any one time. [District Rule 2201 and PSD Permit (SJ 99-03) X.G.2] Federally Enforceable Through Title V Permit

21. Ammonia shall be injected when the selective catalytic reduction system catalyst temperature exceeds 500 degrees F. Permittee shall monitor and record catalyst temperature during periods of startup. [District Rule 2201] Federally Enforceable Through Title V Permit

22. During the cold startup GTE exhaust emissions shall not exceed any of the following: NOx (as NO2) - 130 lb, VOC - 273 lb or CO - 1235 lb, in any one hour. [District Rule 2201 and PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

23. Emission rates from GTE, except during startup and/or shutdown, shall not exceed any of the following: NOx (as NO2) - 17.03 lb/hr and 2.5 ppmvd @ 15% O2, VOC - 2.0 ppmvd @ 15% O2, CO - 24.92 lb/hr and 6 ppmvd @ 15% O2 or ammonia - 10 ppmvd @15% O2. NOx (as NO2) emission limit is a one-hour average. Ammonia emission limit is a twenty-four hour rolling average. All other emission limits are three-hour rolling averages. [District Rules 2201, 4703 and PSD Permit (SJ 99-03) X.D & .E] Federally Enforceable Through Title V Permit

24. Emission rates from the GTE shall not exceed either of the following: PM10 - 9.0 lb/hr and SOx (as SO2) - 3.495 lb/hr. Emission limits are three-hour rolling averages. [District Rules 2201, 4001, and PSD Permit (SJ 99-03) X.F] Federally Enforceable Through Title V Permit

25. On any day when a startup or shutdown occurs, emission rates from GTE shall not exceed any of the following: PM10 - 216 lb/day, SOx (as SO2) - 84 lb/day, NOx (as NO2) - 450 lb/day, VOC - 355 lb/day or CO - 2,113 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Combined annual emissions from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following: PM10 - 224,343 lb/year , SOx (as SO2) - 84,780 lb/year, NOx (as NO2) - 344,484 lb/year, VOC - 227,619 lb/year or CO - 1,220,166 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

27. Combined annual emissions of all hazardous air pollutants (HAPS) from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed 25 tons/year. Combined annual emissions of any single HAP from GTEs S-3636-1, '2 and '3, calculated on a twelve consecutive month rolling basis, shall not exceed 10 tons/year. [District Rule 4002] Federally Enforceable Through Title V Permit

28. Each one-hour period shall commence on the hour. Each one-hour period in a three-hour rolling average will commence on the hour. The three-hour average will be compiled from the three most recent one-hour periods. Each one-hour period in a twenty-four-hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit

29. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve-consecutive-month rolling average emissions shall commence at the beginning of the first day of the month. The twelve-consecutive-month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit

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30. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 = ((a-(bxc/1,000,000)) x 1,000,000 / b) x d, where a = ammonia injection rate(lb/hr)/17(lb/lb. mol), b = dry exhaust gas flow rate (lb/hr)/(29(lb/lb. mol), c = change in measured NOx concentration ppmv at 15% O2 across catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip. Alternatively, permittee may utilize a continuous in-stack ammonia monitor, acceptable to the District, to monitor compliance. At least 60 days prior to using a NH3 CEM, the permittee must submit a monitoring plan for District review and approval. [District Rule 4102]

31. Compliance with the short term emission limits (ppmv @ 15% O2 and lb/hr) shall be demonstrated annually by District witnessed in situ sampling of exhaust gases by a qualified independent source test firm at full load conditions as follows - NOx: ppmvd @ 15% O2 and lb/hr, CO: ppmvd @ 15% O2 and lb/hr, VOC: ppmvd @ 15% O2 and lb/hr, PM10: lb/hr, and ammonia: ppmvd @ 15% O2. Sample collection to demonstrate compliance with ammonia emission limit shall be based on three consecutive test runs of thirty minutes each. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.1] Federally Enforceable Through Title V Permit

32. Compliance with the startup NOx, CO, and VOC mass emission limits shall be demonstrated for one of the GTEs (S-3636-1, '2, or '3) at least once every seven years by District witnessed in situ sampling of exhaust gases by a qualified independent source test firm. CEM relative accuracy shall be determined during startup source testing in accordance with methodology approved by the District. If CEM data is not certifiable to determine compliance with NOx and CO startup emissions limits, then source testing to measure startup NOx and CO mass emissions rates shall be conducted at least once every 12 months. [District Rule 1081] Federally Enforceable Through Title V Permit

33. Based on the initial speciated HAPS and total VOC source test conducted for one of the GTEs (S-3636-1, '2 or '3), Pastoria shall correlate the total HAPS emissions rate and the single highest HAP emission rate to the VOC mass emission determined during the speciated HAPs source test. Annual compliance with the HAPS emissions limit (25 tpy all HAPS or 10 tpy any single HAP) shall be by the combined VOC emissions rates for the GTEs (S-3636-1, '2 and '3) determined during annual compliance source testing and the correlation between VOC emissions and HAP(S). [District Rule 4002] Federally Enforceable Through Title V Permit

34. Compliance with natural gas sulfur content limit shall be demonstrated periodically as required by 40 CFR 60 Subpart GG and 40 CFR 75. [District Rules 2540 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

35. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. Official test results and field data collected by source tests required by conditions on this permit shall be submitted to the District within 60 days of testing. [District Rule 1081 and PSD Permit (SJ 99-03) X.C.2] Federally Enforceable Through Title V Permit

36. Source test plans for seven-year source tests shall include a method for measuring the VOC/CO surrogate relationship that will be used to demonstrate compliance with VOC lb/hr, lb/day, and lb/twelve month rolling emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

37. The following test methods shall be used PM10: EPA method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 4001, 4703, and PSD Permit (SJ 99-03) X.C.2] Federally Enforceable Through Title V Permit

38. The permittee shall maintain hourly records of NOx, CO, and ammonia emission concentrations (ppmv @ 15% O2), and hourly, daily, and twelve month rolling average records of NOx and CO emissions. Compliance with the hourly, daily, and twelve month rolling average VOC emission limits shall be demonstrated by the CO CEM data and the VOC/CO relationship determined by annual CO and VOC source tests. [District Rule 2201] Federally Enforceable Through Title V Permit

39. The permittee shall maintain records of SOx lb/hr, lb/day, and lb/twelve month rolling average emission. SOx emissions shall be based on fuel use records, natural gas sulfur content, and mass balance calculations. [District Rule 2201 and PSD Permit (SJ 99-03) X.K] Federally Enforceable Through Title V Permit

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40. Permittee shall maintain the following records for the GTE: occurrence, duration, and type of any startup, shutdown, or malfunction; performance testing; emission measurements; total daily and rolling twelve month average hours of operation; hourly quantity of fuel used and gross three hour average operating load. [District Rules 2201 & 4703] Federally Enforceable Through Title V Permit

41. Permittee shall maintain the following records for the continuous emissions monitoring system (CEMS): performance testing, evaluations, calibrations, checks, maintenance, adjustments, and any period during which a CEMS was inoperative. [District Rules 2201 & 4703, and PSD Permit (SJ 99-03) X.I.1] Federally Enforceable Through Title V Permit

42. Permittee shall provide notification and record keeping as required under 40 CFR, Part 60, Subpart A, 60.7. [District Rule 4001] Federally Enforceable Through Title V Permit

43. All records required to be maintained by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

44. During the warm startup of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 119 lbs of NOx or 1021 lbs of CO in any one hour. Warm startup means a startup that is not a hot or cold startup and duration of warm startups shall not exceed 2.5 hours. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

45. During the Shutdown of any CTG, the combined emissions from any one CTG and HRSG exhausts must not exceed 58.5 lbs of NOx or 222.5 lbs of CO in any one hour. Shutdown shall be defined as the period beginning with the lowering of equipment from base load and lasting until fuel flow is completely off and combustion has ceased and duration of shutdowns shall not exceed one half hour. [PSD Permit (SJ 99-03) X.G.1] Federally Enforceable Through Title V Permit

46. Total number of start-ups and shut-downs for the facility shall not exceed 674 events per year. [PSD Permit (SJ 99-03) X.G.6] Federally Enforceable Through Title V Permit

47. Any excess emission indicated by the CEM system must be considered a violation of the applicable emission limit in the PSD permit. [PSD Permit (SJ 99-03) X.I.4] Federally Enforceable Through Title V Permit

48. The quality assurance project plan used by the Permittee for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 CFR Part 60, Appendix F, must be available upon request to EPA. [PSD Permit (SJ 99-03) X.I.5] Federally Enforceable Through Title V Permit