DATE: November 9, 2018

TO: Interested Parties

FROM: Eric Veerkamp, Compliance Project Manager

SUBJECT: Walnut Creek Energy Park (05-AFC-2C)
Staff Analysis of Proposed Revisions to Conditions of Certification,
Including Air Quality and Worker Safety

On October 4, 2017, Walnut Creek Energy, LLC (WCE) submitted a Petition to Amend (PTA) to modify the Final Decision for the Walnut Creek Energy Park (WCEP) facility. WCE has requested California Energy Commission (Energy Commission) approval to change the air quality conditions of certification for consistency with the South Coast Air Quality Management District’s (SCAQMD) Title V Permit, issued on September 28, 2017. WCE is requesting revisions to AQ-4 for the ammonia emission limit, and revisions to AQ-7 to add clarifying language pertaining to particulates. WCE is also requesting a change to Worker Safety-5 (WS-5) to remove outdated language related to training security guards in the use of emergency equipment.

WCEP was certified on February 27, 2008, and is a 500-megawatt, simple-cycle, gas-fired peaking power plant. The project commenced operation on May 1, 2013. WCEP is located at 911 Bixby Drive in the City of Industry in Los Angeles County, California.

Energy Commission staff reviewed the present PTA and assessed the impacts of this proposal on environmental quality and on public health and safety. Based on staff’s analysis, staff proposes to reject the revisions to AQ-4, to change the ammonia emission limit from 5.0 parts per million volume (PPMV) to 5 PPMV; and to accept the proposed revisions to AQ-7 to clarify that the operating load of 100 percent of PM10 emission tests also applies to PM2.5 emission tests. Staff is also proposing minor modifications to a number of other conditions of certification to incorporate South Coast Air Quality Management District condition language that changed as a result of new Title V requirements.

Staff also proposes to modify the language of WS-5, as requested in the petition, to remove specific language pertaining to training security guards how to use an automatic external defibrillator, because WCEP no longer employs security guards. It is staff’s opinion that, with this action, the project would remain in compliance with applicable laws, ordinances, regulations, and standards (LORS), and the proposed changes to the project would not result in any significant adverse direct, indirect, or cumulative impacts to the environment (Cal. Code of Regs., tit.20, § 1769).
The amendment petition and Staff Analysis have been posted on the Energy Commission’s WCEP webpage at: https://www.energy.ca.gov/sitingcases/walnutcreek/index.html. Energy Commission staff intends to recommend approval of the petition at the December 10, 2018, Business Meeting of the Energy Commission. After the Final Decision, the Energy Commission Order regarding this petition will also be posted on the Commission’s WCEP webpage.

This notice is being provided to interested parties and property owners adjacent to the WCEP site. The notice is being mailed to the WCEP mail list and sent electronically to the WCEP list serve.

Any person may comment on the Staff Analysis. Those who wish to comment on the analysis are asked to submit their comments by 5:00 PM on Monday, December 5, 2018. To use the Energy Commission’s electronic commenting feature, go to the Energy Commission’s webpage for this facility, cited above, click on either the “Comment on this Proceeding” or “Submit e-Comment” link, and follow the instructions in the on-line form. Be sure to include the facility name in your comments.

Written comments may also be mailed or hand-delivered to:

California Energy Commission
Dockets Unit, MS-4
Docket No. 05-AFC-02C
1516 Ninth Street
Sacramento, CA 95814-5512

All comments and materials filed with and approved by the Dockets Unit will be added to the WCEP Docket Log and become publically accessible on the Energy Commission’s webpage for the facility.

If you have questions about this notice, please contact Eric Veerkamp, Compliance Project Manager, at (916) 654-4295 or via e-mail at: eric.veerkamp@energy.ca.gov

For information on participating in the Energy Commission’s review of the proposed modification to the WCEP, please contact the Energy Commission Public Adviser’s Office at (800) 822-6228 (toll-free in California). The Public Adviser’s Office can also be contacted via e-mail at: publicadviser@energy.ca.gov. News media inquiries should be directed to the Energy Commission Media Office at (916) 654-4989, or by e-mail at: mediaoffice@energy.ca.gov

Mail List 7096
Walnut Creek Energy Park List Serve
INTRODUCTION

On October 4, 2017, Walnut Creek Energy, LLC (WCE) (Petitioner), filed a Petition to Amend (PTA) the Final Decision for the Walnut Creek Energy Park (WCEP) project. The 500-megawatt project was certified by the California Energy Commission on February 27, 2008 and was on line and producing power on May 1, 2013. The facility is located at 911 Bixby Drive in the City of Industry, Los Angeles County.

The purpose of the California Energy Commission’s review process is to assess the impacts of this proposal on environmental quality and on public health and safety. The review process includes an evaluation of the consistency of the proposed changes with the Energy Commission’s Decision and a determination on whether the facility, as modified, would remain in compliance with applicable laws, ordinances, regulations, and standards (LORS) (Cal. Code of Regs., tit. 20, § 1769).

Energy Commission staff has completed its review of all materials received. The Staff Analysis below is staff’s independent assessment of the project owner’s proposal to modify the project description.

PROJECT LOCATION AND DESCRIPTION

The simple-cycle natural, gas-fired, 500-megawatt electricity generating facility was certified by the Energy Commission on February 27, 2008, and the Final Decision has been amended in past years. WCEP began commercial operation on May 1, 2013. WCEP is located at 911 Bixby Drive in the City of Industry in Los Angeles County, California.

DESCRIPTION OF PROPOSED MODIFICATIONS

The proposed modifications include revising the language of several conditions of certification for air quality and worker safety, including AQ-4, AQ-7, and WS-5. For air quality, WCE is requesting to change AQ-4, revising the ammonia emission limit from 5.0 ppm to 5 PPMV. This change would reduce the precision of the emission limit and potentially increase the limit by 0.5 PPMV. Staff does not support this revision, which has also been rejected by the SCAQMD.

WCE is also requesting to change AQ-7, adding a PM2.5 testing requirement. The proposed testing would be done using the EPA Method 201A and 202, at a turbine load point of 100 percent. Staff supports this change, which was also accepted by the SCAQMD and is in the updated Title V permit. In order to be consistent with the air permit, AQ-7 would be split into two new Conditions, AQ-7, and AQ-7a.
Staff is also proposing minor modifications to a number of other conditions of certification in response to the petition. A summary of the additional proposed changes is below. The minor modifications are administrative in nature and incorporate South Coast Air Quality Management District condition language that changed as a result of new Title V requirements.

<table>
<thead>
<tr>
<th>AQ-1, Revised</th>
<th>AQ-10, Modified</th>
<th>AQ-18, Revised</th>
</tr>
</thead>
<tbody>
<tr>
<td>AQ-2, Deleted</td>
<td>AQ-11, Modified</td>
<td>AQ-19, Revised</td>
</tr>
<tr>
<td>AQ-3, Modified</td>
<td>AQ-12, Modified</td>
<td>AQ-20, New</td>
</tr>
<tr>
<td>AQ-4, Modified</td>
<td>AQ-13, Modified</td>
<td>AQ-21, New</td>
</tr>
<tr>
<td>AQ-6, Modified</td>
<td>AQ-14, Modified</td>
<td>AQ-22, New</td>
</tr>
<tr>
<td>AQ-8, Modified</td>
<td>AQ-15, Modified</td>
<td>AQ-23, New</td>
</tr>
<tr>
<td>AQ-9, Modified</td>
<td>AQ-16, Modified</td>
<td></td>
</tr>
<tr>
<td>AQ-9a, New</td>
<td>AQ-17, Modified</td>
<td></td>
</tr>
</tbody>
</table>
WCEP no longer employs a security guard, and therefore, cannot comply with the health and safety training specified in WS-5. The amended condition would still require that appropriate staff have the specified training. HAZ-9 contains sufficient alternative security measures such that a security guard is not required. Approval of the proposed change would not have a significant impact on power plant worker safety, and it would ensure consistency with the approved security plan.

NECESSITY FOR THE PROPOSED MODIFICATIONS
The project owner, WCE, indicated they were seeking a change to AQ-4 in order to be consistent with other like permit conditions for similar plants, and also because they believed the change to be in keeping with best technology practices. The changes related to AQ-7 are being requested in order to address specific testing conditions and methods, and to maintain consistency with the requested conditions in the updated SCAQMD air permit. Finally, WCE requested changes to WS-5 because the plant no longer employs a security guard, and therefore, cannot meet the requirements of the condition. The approved operational site security plan does not require a security guard, and other protections in HAZ-9 sufficiently protect worker safety.

STAFF’S ASSESSMENT OF THE PROPOSED PROJECT CHANGES
Staff reviewed the PTA for potential environmental effects and consistency with applicable LORS, and determined that the proposed changes would not cause significant impacts on the environment or cause the project to not comply with applicable LORS. For the technical area of Air Quality and Worker Safety, staff proposes to accept the revisions to AQ-7, reject the proposed revisions to AQ-4, and to accept the proposed changes to WS-5. LORS have been updated since the WCEP was approved; the changes to conditions of certification would ensure the WCEP is in conformance.

The resulting modifications would be beneficial because they would allow the project to perform testing using the most current methods, while also maintaining conformance with the SCAQMD permit. The modifications would also allow the WCEP to be able to meet the requirements of WS-5. Staff has concluded that the environmental impacts associated with changes to the conditions of certification would not result in any impacts that would be different than those that occurred during project construction and that the activity would not result in significant environmental impacts or risks to public health.

Staff’s conclusions in each technical area are summarized in Executive Summary Table 1, below.
## Executive Summary Table 1
### Summary of Conclusions for Each Technical Area

<table>
<thead>
<tr>
<th>Technical Areas Reviewed</th>
<th>Technical Area Not Affected</th>
<th>CEQA</th>
<th>Conforms with applicable LORS</th>
<th>Revised or New Conditions of Certification requested or recommended</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Potentially significant impact</td>
<td>Less than significant impact with mitigation</td>
<td>Less than significant impact</td>
</tr>
<tr>
<td>Air Quality</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Biology</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Cultural Resources</td>
<td>X</td>
<td></td>
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<tr>
<td>Geology and Paleontology</td>
<td>X</td>
<td></td>
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<tr>
<td>Hazardous Materials</td>
<td>X</td>
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<tr>
<td>Land Use</td>
<td>X</td>
<td></td>
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<tr>
<td>Noise</td>
<td>X</td>
<td></td>
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<tr>
<td>Public Health</td>
<td>X</td>
<td></td>
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<tr>
<td>Socioeconomics</td>
<td>X</td>
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<tr>
<td>Traffic and Transportation</td>
<td>X</td>
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<tr>
<td>Visual Resources</td>
<td>X</td>
<td></td>
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<tr>
<td>Waste Management</td>
<td>X</td>
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<tr>
<td>Water Quality and Soils</td>
<td>X</td>
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<tr>
<td>Efficiency</td>
<td>X</td>
<td></td>
<td></td>
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<tr>
<td>Facility Design</td>
<td>X</td>
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<tr>
<td>Reliability</td>
<td>X</td>
<td></td>
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<td></td>
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<tr>
<td>Transmission Line Safety and Nuisance</td>
<td>X</td>
<td></td>
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<tr>
<td>Transmission System Engineering</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Worker Safety</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>
Staff has determined that the technical or environmental areas of Biology, Cultural Resources, Geology and Paleontology, Hazardous Materials, Land Use, Noise, Public Health, Socioeconomics, Traffic and Transportation, Visual Resources, Waste Management, Water Quality and Soils, Efficiency, Facility Design, Reliability, Transmission Line Safety and Nuisance, and Transmission System Engineering, are not affected by the proposed changes.

For the technical areas of **Air Quality** and **Worker Safety**, staff has proposed new conditions of certification (and the elimination of one condition) to assure compliance with current design standards that protect the public health and safety from environmental concerns. The details of the proposed condition changes are found in the attached **Air Quality** and **Worker Safety** Staff Analysis.

**STAFF RECOMMENDATIONS AND CONCLUSIONS**

Staff concludes that with the adoption of the attached conditions of certification, the modified WCEP would continue to comply with applicable LORS. The proposed revisions would not result in significant impacts.
INTRODUCTION

On October 4th, 2017, Walnut Creek Energy, LLC (WCE) filed a petition with the California Energy Commission requesting to amend the conditions of certification (COC) for the Walnut Creek Energy Park (WCE 2017). This amendment involves several minor permit changes to the Energy Commission’s Final Decision made on February 27th, 2008 (CEC2008), Order Approving a Petition to Amend Air Quality Conditions of Certification issued on May 4th, 2011 (CEC 2011a) and Order Approving a Petition to Modify Eight and Delete Two Air Quality Conditions of Certification on December 18, 2012 (CEC2012a). Staff proposes changes to several conditions of certification based on the petition. Staff found these changes consistent with all applicable laws, ordinances, regulations and standards (LORS). Therefore, the proposed changes do not result in any significant air quality impacts.

BACKGROUND

This power plant was certified by the Energy Commission on February 27th, 2008 (CEC 2008) and began commercial operation on May 1st, 2013. The facility as approved is a nominal 500-megawatt (MW) natural gas-fired peaking power plant located in the City of Industry in Los Angeles County. The current amendment requests minor modifications to two Air Quality conditions of certification. The requested changes to the conditions are:

- **AQ-4**: Change of the ammonia emission limit from 5.0 parts per million volume (PPMV) to 5 PPMV.
- **AQ-7**: Clarification that the operating load of 100 percent of PM10 emission tests also applies to PM2.5 emission tests.

Staff proposes to accept changes to **AQ-7** with some revisions and reject those in **AQ-4**.

In addition, staff also proposes administrative changes to several Air Quality Conditions of Certification.

The staff proposed changes do not involve significant modifications to any plant equipment or facility design. These changes are consistent with all applicable laws, ordinances, regulations and standards (LORS), and do not result in any significant adverse air quality impacts. If approved by the Energy Commission, the proposed changes include compliance provisions that would ensure that the project complies with LORS (i.e., is consistent with the revised July 2018 South Coast Air Quality Management District (SCAQMD) Title V permit) and is fully mitigated.
LAWS, ORDINANCES, REGULATIONS, AND STANDARDS (LORS) - COMPLIANCE

The applicable LORS have been identified in the Final Staff Assessment (FSA) (CEC2007) and previous Staff Analyses of Proposed Modification (CEC 2011b and CEC2012b). The analysis of this amendment would not change project compliance with any LORS.

ANALYSIS OF PROJECT OWNER AMENDMENT REQUESTS

Change of the Ammonia Emission Limit

The applicant proposed to change the ammonia emission limit from 5.0 PPMV to 5 PPMV. The change in significant digits would reduce the precision of the emission limit and potentially increase the limit by approximately 0.5 PPMV. Although 5 PPMV is still used in permits for some older SCAQMD projects, SCAQMD is continuously updating the limit to 5.0 PPMV as appropriate. Therefore, staff does not think this is a proper change and proposes to reject this request. The same request has also been rejected by SCAQMD in the Title V Administrative Permit Revisions dated July 27, 2018.

Clarification of PM2.5 Testing Load

The applicant proposes to add PM2.5 source testing requirement to AQ-7. PM2.5 testing was added to periodic source tests which are conducted every three years. The PM 2.5 testing would be conducted using EPA Method 201A and 202. The test would be conducted at a turbine load point of 100 percent. Staff agrees to this change. The same change has also been accepted by SCAQMD and included in the updated Title V permit.

PROPOSED AMENDED CONDITIONS OF CERTIFICATION

Below is the revised AQ-7 based on the requests from the project owner. In order to incorporate these changes and be consistent with the revised SCAQMD Title V permit, the original AQ-7 has been broken into two separate conditions AQ-7 and AQ-7a. Strikethrough is used to indicate deleted language and underline and bold is used for new language.

AQ-7 The project owner shall conduct an initial source test for NOx, CO, SOx, VOC, NH3, and PM10 and a periodic source test every three years thereafter for NOx, CO, SOx, VOC and PM10 of each gas turbine exhaust stack in accordance with the following requirements:

- The project owner shall submit a source test protocol to the District and the CPM 45 days prior to the proposed source test date for approval. The protocol shall include the proposed operating conditions of the gas turbine, the identity of the testing lab, a statement from the lab certifying that it meets the criteria of District Rule 304, and a description of all sampling and analytical procedures.
• The initial source test shall be conducted no later than 180 days following the date of first fire.

• The District and CPM shall be notified at least 10 days prior to the date and time of the source test.

• The source test shall be conducted with the gas turbine operating under maximum, average and minimum loads.

• The source test shall be conducted to determine the oxygen levels in the exhaust.

• The source test shall measure the mass flow rate in lb/hr, fuel flow rate, the flue gas flow rate and the turbine generating output in MW.

• The source test shall be conducted for the pollutants listed using the methods, averaging times, and test locations indicated and as approved by the CPM:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Method</th>
<th>Averaging Time</th>
<th>Test Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>District Method 100.1</td>
<td>1-hour</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>CO</td>
<td>District Method 100.1</td>
<td>1-hour</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>SOx</td>
<td>District Method 307-91</td>
<td>District approved averaging time</td>
<td>Fuel Sample</td>
</tr>
<tr>
<td>VOC</td>
<td>District Method 25.3</td>
<td>1-hour</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>PM10 (and as a surrogate for PM2.5)</td>
<td>District Method 5</td>
<td>4-hours</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>Ammonia</td>
<td>District Methods 5.3 and 207.1 or EPA Method 17</td>
<td>1-hour</td>
<td>Outlet of SCR</td>
</tr>
</tbody>
</table>

• The source test results shall be submitted to the District and the CPM no later than 60 days after the source test was conducted.

• All emission data is to be expressed in the following units:
  • ppmv corrected to 15% oxygen dry basis,
  • pounds per hour,
  • pounds per million cubic feet of fuel burned and
  • additionally, for PM10 only, grains per dry standard cubic feet of fuel burned.

• Exhaust flow rate shall be expresses in terms of dry standard cubic feet per minute and dry actual cubic feet per minute.

• All moisture concentrations shall be expressed in terms of percent corrected to 15 percent oxygen.

Verification: The project owner shall submit the proposed protocol for the initial source tests 45 days prior to the proposed source test date to both the District and CPM for approval. The project owner shall submit source test results no later than 60 days.
following the source test date to both the District and CPM. The project owner shall notify the District and CPM no later than 10 days prior to the proposed initial source test date and time.

**AQ-7** The project owner shall conduct source tests for the pollutants identified below.

<table>
<thead>
<tr>
<th>Pollutant(s) to be tested</th>
<th>Required Test Method(s)</th>
<th>Averaging Time</th>
<th>Test Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOx emissions</td>
<td>AQMD Laboratory Method 307-91</td>
<td>Not Applicable</td>
<td>Fuel Sample</td>
</tr>
<tr>
<td>VOC emissions</td>
<td>District Method 25.3</td>
<td>1 hour</td>
<td>Outlet of the SCR serving this equipment</td>
</tr>
<tr>
<td>PM10 emissions</td>
<td>District Method 5</td>
<td>4 hours</td>
<td>Outlet of the SCR serving this equipment</td>
</tr>
<tr>
<td>PM2.5</td>
<td>EPA Method 201A and 202</td>
<td>4 hours</td>
<td>Outlet of the SCR serving this equipment</td>
</tr>
</tbody>
</table>

The tests shall be conducted at least once every three years. The SCAQMD shall be notified of the date and time of the tests at least 10 days prior to the test.

The tests shall be conducted to determine the oxygen levels in the exhaust. In addition, the tests shall measure the fuel flow rate (CFH), the flue gas flow rate, and the turbine generating output in MW.

The tests shall be conducted in accordance with SCAQMD approved test protocol. The protocol shall be submitted to the SCAQMD engineer no later than 45 days before the proposed test date and shall be approved by the SCAQMD before the test commences. The test protocol shall include the proposed operating conditions of the turbine during the tests, the identity of the testing lab, a statement from the testing lab certifying that it meets the criteria of Rule 304, and a description of all sampling and analytical procedures.

The tests shall be conducted when this equipment is operating at loads of 100, 75, and 50 percent, with the exception of PM10 and PM2.5 testing. For PM10 and PM2.5, the test shall be conducted when this equipment is operating at a load of 100 percent.

For natural gas fired-turbines only, for the purpose of demonstrating compliance with VOC BACT limits as determined by SCAQMD, the project owner shall use Method 25.3 modified as follows:
a) Triplicate stack gas samples extracted directly into Summa canisters, maintaining a final canister pressure between 400-500 mmHg absolute,

b) Pressurization of the Summa canisters with zero gas analyzed/certified to contain less than 0.05 PPMV total hydrocarbons as carbon, and

c) Analysis of Summa canisters per the canister analysis portion of SCAQMD Method 25.3 with a minimum detection limit of 0.3 PPMV or less and reported to two significant figures. The temperature of the Summa canisters when extracting samples for analysis shall not be below 70 degrees Fahrenheit.

The use of this alternative method for VOC compliance determination does not mean that it is more accurate than unmodified AQMD Method 25.3, nor does it mean that it may be used in lieu of SCAQMD Method 25.3 without prior approval, except for the determination of compliance with the BACT level of 2.0 PPMV VOC calculated as carbon for natural gas fired turbines.

The test results shall be reported with two significant digits.

For the purposes of this condition, an alternative test method may be allowed for each of the above pollutants upon concurrence of the CPM, SCAQMD, EPA, and CARB.

Verification: The project owner shall submit the proposed protocol for the source tests 45 days prior to the proposed source test date to both the District and CPM. The project owner shall notify the District and CPM no later than 10 days prior to the proposed source test date and time. The project owner shall submit source test results no later than 45 days following the source test date to both the District and CPM.

AQ-7aThe project owner shall conduct source test(s) for the pollutant(s) identified below.

<table>
<thead>
<tr>
<th>Pollutant(s) to be tested</th>
<th>Required Test Method(s)</th>
<th>Averaging Time</th>
<th>Test Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>NH₃ emissions</td>
<td>District method 207.1 and 5.3 or EPA Method 17</td>
<td>1 hour</td>
<td>Outlet of the SCR serving this equipment</td>
</tr>
</tbody>
</table>

The test shall be conducted and the results submitted to the District within 45 days after the test date. The CPM and AQMD shall be notified the data and time of the test at least 7 days prior to the test.

The test shall be conducted at least once per year. The NOx concentration, as determined by the CEMS, shall be simultaneously recorded during the ammonia slip test. If the CEMS is inoperable, a test shall be conducted to determine the NOx emissions using District Method 100.1 measured over a 60-minute averaging time period.
The test shall be conducted to determine compliance with the Rule 1303 BACT concentration limit.

Verification: The project owner shall submit the proposed protocol for the source tests 45 days prior to the proposed source test date to both the District and CPM. The project owner shall notify the District and CPM no later than 7 days prior to the proposed source test date and time. The project owner shall submit source test results no later than 45 days following the source test date to both the District and CPM.

ADDITIONAL PROPOSED AMENDED CONDITIONS OF CERTIFICATION

Staff proposes several additional administrative changes to other Air Quality COCs to incorporate SCAQMD condition language that has changed as a result of Title V requirements. Below are the COCs that should be updated from those approved in the 2008 Energy Commission Final Decision (CEC2008), Order Approving a Petition to Amend Air Quality Conditions of Certification issued on May 5th, 2011 (CEC 2011a) and Order Approving a Petition to Modify Eight and Delete Two Air Quality Conditions of Certification (CEC2012a). **Bold underline** is used to indicate new language. **Strikethrough** is used to indicate deleted language.

**AQ-1** The project owner shall limit the emissions from each gas fired combustion turbine exhaust stacks as follows:

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Emissions Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM10</td>
<td>Less than or equal to 2,592 lbs. in any one month</td>
</tr>
<tr>
<td>VOC</td>
<td>Less than or equal to 1,035 lbs. in any one month</td>
</tr>
</tbody>
</table>

For the purpose of this condition, the limit(s) shall be based on the emissions from a single exhaust stack. During commissioning, the VOC emissions shall not exceed 1,043 lbs in any one month.

The project owner shall calculate the emission limit(s) by using the monthly fuel use data and the following emission factors: PM10: 7.04 lb/mmscf and VOC: 2.73 lb/mmscf.

The project owner shall calculate the monthly emissions for PM10 and VOC using the equation below and the following emission factors: VOC: 2.73 lb/mmscf; and PM10: 7.04 lb/mmscf

\[
\text{Monthly emissions, lb/month} = (Q) \times (EF),
\]

Where \(Q\) = monthly fuel usage, mmscf/month and \(EF\) = emission factor indicated above.

For the purpose of this condition, the limit(s) shall be based on the emissions from a single turbine.

The project owner shall limit emissions from the facility as follows:
### Contaminant Emissions Limit

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Emissions Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM2.5</td>
<td>Less than 60.89 TONS in ANY ONE YEAR</td>
</tr>
<tr>
<td>CO</td>
<td>Less than or equal to 112.96 TONS in ANY ONE YEAR</td>
</tr>
</tbody>
</table>

For the purpose of this condition, the PM emission limit shall be defined as particulate matter with aerodynamic diameter of 2.5 microns or less.

The CO emission limit of 112.96 tons per year in this condition shall only apply during non-commissioning years. The total annual CO emissions during the commissioning year shall not exceed 134.6 tons per year.

The project owner shall calculate the monthly emissions for PM2.5 and CO using the equation below and the following emission factors: PM2.5: 7.04 lbs./mmscf; CO 13.76 lb/mmcf, or an AQMD approved factor based on compliance test data. If any valid source test performed after January 1, 2013 shows a higher PM2.5 emission rate than the factor in this condition, then those test results shall be used to calculate emissions from the date of the test forward.

Monthly emissions, lb/month = (Q) x (EF); where Q = monthly fuel usage in mmcf/month and EF = emission factor indicated above.

Compliance with the CO emission limit shall be verified through valid CEMS data.

The project owner shall calculate the emission limits for the purpose of determining compliance with the CO limit in the absence of valid CEMS data by using the above equation, and the following emission factors:

A) During the commissioning period and prior to CO catalyst installation — 125.87 lb CO/mmcf.

B) After installation of the CO catalyst but prior to CO CEMS certification testing — 13.76 lb CO/mmcf. The emission rate shall be recalculated in accordance with condition AQ-10 if the approved CEMS certification test results in emission concentration higher than 4 ppmv.

C) After CO CEMS certification testing — 13.76 lb CO/mmcf. After CO CEMS certification test is approved by the AQMD, the emissions monitored by the CEMS and calculated in accordance with condition AQ-10 shall be used to calculate emissions.

For the purpose of this condition, the yearly emission limit shall be defined as a period of 12 consecutive months determined on a rolling basis with a new 12-month period beginning on the first day of each calendar month.
Verification: The project owner shall submit all emission calculations, fuel use, CEM records and a summary demonstrating compliance with all emission limits stated in this Condition for approval to the CPM on a quarterly basis in the quarterly emissions report (AQ-SC10).

AQ-2 (DELETED) The project owner/operator shall not produce emissions of oxides of nitrogen from the facility, including the firewater pump and all five gas turbines combined, that exceed the RECLAIM Trading Credits holdings required in Condition of Certification AQ-16 within a calendar year.

Verification: The project owner/operator shall submit to the CPM no later than 60 days following the end of each calendar year, the SCAQMD required (via Rule 2004) Quarterly Certification of Emissions (or equivalent) for each quarter and the Annual Permit Emissions Program report (or equivalent) as prescribed by the SCAQMD Executive Officer.

AQ-3 The 2.5 ppm PPMV NOx emission limit, 2.0 ppm PPMV VOC emission limit and the 4.0 ppm PPMV CO emission limit shall not apply during turbine commissioning, start-up and shutdown periods. The commissioning period shall not exceed 134 operating hours per turbine from the initial start-up. Following commissioning, start-ups shall not exceed 60 minutes for each startup and the number of start-ups shall not exceed 480 per year. Following commissioning, shutdowns shall not exceed 10 minutes for each shutdown. Following commissioning, the number of startups shall not exceed two per day per turbine. Start-up time shall not exceed 60 minutes. Shutdown time shall not exceed 10 minutes for each shutdown. The turbine shall be limited to a maximum of 480 start-ups per year. Written records of commissioning, start-ups and shutdowns shall be kept maintained and made available to District and submitted to the CPM for approval upon request from the District Executive Officer and the CPM. The 123.46 lb/mmscf NOx emission limit(s) shall only apply during interim reporting period during initial turbine commissioning and the 10.73 lbs/mmscf shall apply only during the interim reporting period after the initial turbine commissioning period, to report RECLAIM emissions. The interim period shall not exceed 12 months from the initial start-up date.

Verification: The project owner shall provide the District and the CPM with the written notification of the initial start-up date no later than 60 days prior to the startup date. The project owner shall submit, commencing one month from the time of gas turbine first fire, a monthly commissioning status report throughout the duration of the commissioning phase that demonstrates compliance with this condition and the emission limits of Condition AQ-13. The monthly commissioning status report shall include criteria pollutant emission estimates for each commissioning activity and total commissioning emission estimates. The monthly commissioning status report shall be submitted to the CPM until the report includes the completion of the initial commissioning activities. The project owner shall provide start-up and shutdown occurrence and duration data as part of the Quarterly Operation Report (AQ-SC10). The project owner shall make the site available for inspection of the commissioning and startup/shutdown records by representatives of the District, CARB and the Commission.
AQ-4  The 2.5 ppm PPMV NOx emissions limit(s) are is averaged over 60 minutes at 15 percent oxygen, dry basis 15% O₂, dry.

The 4.0 ppm PPMV CO emission limit(s) are is averaged over 60 minutes at 15 percent oxygen, dry basis 15% O₂, dry.

The 2.0 ppm PPMV VOC emission limit(s) are is averaged over 60 minutes at 15 percent oxygen, dry basis 15% O₂, dry.

The 5.0 ppm PPMV NH₃ emission limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis 15% O₂, dry.

Verification: The project owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report of Condition of Certification AQ-SC10.

AQ-5 The project owner may at no time purposefully exceed either the mass or concentration emission limits set forth in Conditions of Certification AQ-1, -2, -3 or -4. For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

Verification: The project owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report of Condition of Certification AQ-SC10.

AQ-6 The project owner shall limit the fuel usage from each turbine to no more than 367 mmcf of pipeline quality natural gas MM cubic feet in any one calendar month. For the purpose of this condition, fuel usage shall be defined as the total natural gas usage of a single turbine. The operator shall install and maintain a fuel flow meter and recorder to accurately indicate and record the fuel usage being supplied to each turbine. The project owner shall maintain records in a manner approved by the District and the CPM, to demonstrate compliance with this condition. The project owner shall install and maintain a flow meter to accurately indicate the fuel usage being supplied to the turbine. The project owner shall also install and maintain a device to continuously record the parameter being measured.

Verification: The project owner shall submit to the CPM for approval all fuel usage records on a quarterly basis as part of the quarterly emissions report of Condition of Certification AQ-SC10.

AQ-8 The project owner shall conduct source testing of each gas turbine exhaust stack in accordance with the following requirements:

- The project owner shall submit a source test protocol to the District and the CPM no later than 45 days prior to the proposed source test date for approval. The protocol shall include the proposed operating conditions of the gas turbine, the identity of the testing lab, a statement from the lab certifying that it meets the criteria of District Rule 304, and a description of all sampling and analytical procedures.
Ammonia source testing shall be conducted quarterly for the first 12 months of operation and annually thereafter.

NOx concentrations as determined by CEMS shall be simultaneously recorded during the ammonia test. If the NOx CEMS is inoperable, a test shall be conducted to determine the NOx emission by using District Method 100.1 measured over a 60 minute time period.

Source testing shall be conducted to determine the ammonia emissions from each gas turbine exhaust stack using District Method 5.3 and 207.1 or EPA Method 17 measured over a 1 hour averaging period at the outlet of the SCR.

The District and CPM shall be notified of the date and time of the source testing at least 7 days prior to the test.

The source test shall be conducted and the results submitted to the District and CPM within 45 days after the test date.

Source testing shall measure the fuel flow rate, the flue gas flow rate and the gas turbine generating output.

The test shall be conducted when the equipment is operating at 80 percent load or greater.

All emission data is to be expressed in the following units:

- ppmv corrected to 15% oxygen;
- pounds per hour;
- pounds per million cubic feet of fuel burned and

Verification: The project owner shall submit the proposed protocol for the source tests 45 days prior to the proposed source test date to both the District and CPM for approval. The project owner shall notify the District and CPM no later than 7 days prior to the proposed source test date and time. The project owner shall submit source test results no later than 45 days following the source test date to both the District and CPM.

AQ-9 The project owner shall install and maintain a CEMS in each exhaust stack of the combustion turbine trains to measure the following parameters:

- NOx concentration in ppmv and CO concentration in ppmv.
- Concentrations shall be corrected to 15 percent oxygen on a dry basis.
- The CEMS will convert the actual CO concentrations to mass emission rates (lb/hr) and record the hourly emission rates on a continuous basis.
- The CEMS shall be installed and operated to measure CO concentration over a 15 minute averaging time period.
- The CEMS shall be installed and operated in accordance with an approved District Rule 218 CEMS plan application and the requirements of Rule 2012.
- The CO CEMS shall be installed and operating no later than 90 days after initial start-up of the turbine.
- The NOx CEMS shall be installed and operating no later than 12 months after initial start-up of the turbine.

- During the interim period between the initial start-up and the provisional certification date of the CEMS, the project owner shall comply with the monitoring requirements of Rule 2012 (h)(2) and Rule 2012 (h)(3). Within two weeks of the turbine start-up date, the project owner shall provide written notification to the District of the exact date of start-up.

**Verification:** Within 30 days of certification, the project owner shall notify the CPM of the completion of the certification process for the CEMS.

**AQ-8** The project owner shall provide to the District a source test report in accordance with the following specifications:

Source test results shall be submitted to the District and the CPM no later than 60 days after the source test was conducted.

Emission data shall be expressed in terms of concentration (PPMV) corrected to 15 percent oxygen (dry basis), mass rate (lbs/hr), and lbs/MM Cubic Feet. In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM).

All moisture concentrations shall be expressed in terms of percent corrected to 15 percent oxygen.

Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (CFH), the flue gas temperature, and the generator power output (MW) under which the test was conducted.

**Verification:** The project owner shall submit source test results no later than 45 days following the source test date to both the District and CPM.

**AQ-9** The project owner shall install and maintain a CEMS to measure the following parameters:

CO concentration in PPMV.

Concentrations shall be corrected to 15 percent oxygen on a dry basis.

The CEMS shall be operated in accordance with approved AQMD Rule 218 CEMS plan application.

The CEMS shall be operated to measure CO concentrations over a 15-minute averaging time period.

The CEMS will convert the actual CO concentrations to mass emission rates (lb/hr) using the equation below and record the hourly emission rates on a continuous basis.
CO Emission Rate, lb/hr = K Cco Fd [20.9/(20.9%-%O2d)][(Qg*HHV)/106],
where

K = 7.267EE-8(lb/scf)/PPMV

Cco = Average of four consecutive 15 min ave CO concentration, PPMV

Fd = 8710 dscf/MMBTU natural gas

%O2d = Hourly average % by volume O2, dry corresponding to Cco

Qg = Fuel gas usage during the hour, scf/hr

HHV = Gross high heating value of fuel gas, BTU/scf

Verification: Within 30 days of certification, the project owner shall notify the
CPM of the completion of the certification process for the CEMS.

AQ-9a The project owner shall install and maintain a CEMS to measure the
following parameters:

NOx concentration in PPMV.

Concentrations shall be corrected to 15 percent oxygen on a dry basis.

The CEMS shall comply with the requirements of Rule 2012. During
provisional certification date of the CEMS, the project owner shall comply
with the monitoring requirements of Rule 2012(h)(2) and 2012(h)(3).

Verification: Within 30 days of certification, the project owner shall notify the
CPM of the completion of the certification process for the CEMS.

AQ-10 The project owner shall keep records in a manner approved by the District for
the following items parameter(s) or item(s):

• Natural Gas fuel use after CEMS certification
• Natural Gas use during the commissioning period
• Natural Gas use after the commissioning period and prior to the CEMS
certification.

Verification: The project owner shall submit to the CPM for approval all fuel usage
records on a quarterly basis as part of the quarterly emissions report of Condition of
Certification AQ-SC10.

AQ-11 The owner/operator shall determine the hourly ammonia slip emissions from
each exhaust stack for each gas turbine train individually via the following
formula:

\[ \text{NH}_3 \text{ (ppmv)} = \left[ a - \frac{b}{10^6} \right] \times 10^6 / b \]

Where:
The above described ammonia slip calculation procedure shall not be used for compliance determination or emission information determination without corroborative data using an approved reference method for the determination of ammonia for the District.

The owner/operator shall install a NOx analyzer to measure the SCR inlet NOx ppm accurate to within +/- 5 percent calibrated at least once every 12 months.

The project owner shall calculate and continuously record NH3 slip emission using the following:

\[
NH_3 \text{ (PPMV) = } \left[ a - b \cdot c / 1EE+06 \right] \cdot 1EE+06 / b; \text{ where}
\]

\[
a = NH_3 \text{ injection rate (lb/hr)} / 17 \text{ lb-lb-mol}
\]

\[
b = \text{ dry exhaust gas flow rate (scf/hr)} / 385.3 \text{ scf/lb-mol},
\]

\[
c = \text{ change in measured NOx across the SCR (ppmvd at 15\% O2)}
\]

The project owner shall maintain a NOx analyzer to measure the SCR inlet NOx PPMV accurate to plus or minus 5 percent calibrated at least once every twelve months.

The project owner shall use the above described method or other alternative method approved by the Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

**Verification:** The project owner shall include ammonia slip concentrations averaged on an hourly basis calculated via the District Requirement protocol provided as part of the Quarterly Operational Report required in Condition of Certification AQ-SC10. The project owner shall submit all calibration results performed to the CPM within 60 days of the calibration date.

**AQ-12** The operator shall install and maintain an ammonia injection flow meter and recorder to accurately indicate and record the ammonia injection flow rate being supplied to each turbine. The device or gauge shall be accurate to within plus or minus 5 percent and shall be calibrated once every twelve months.

Continuously recording is defined for this condition as at least once every hour and is based on the average of the continuous monitoring for that hour.
The project owner shall install and maintain a flow meter to accurately indicate the flow rate of the total hourly throughput of injected ammonia. The project owner shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months. The ammonia injection rate shall not exceed 215 lb/hr.

For the purpose of this condition, continuously record shall be defined as recording at least once every hour and shall be calculated based upon the average of the continuous monitoring for that hour.

Verification: The project owner shall submit to the CPM no less than 30 days after installation, a written statement by a California registered Professional Engineer stating that said engineer has reviewed the as-built-designs or inspected the identified equipment and certifies that the appropriate device has been installed and is functioning properly. The project owner shall submit annual calibration results within 30 days of their successful completion.

AQ-13 The operator shall install and maintain a temperature gauge and recorder to accurately indicate and record the temperature in the exhaust as the inlet of the SCR reactor. The gauge shall be accurate to within plus or minus 5 percent and shall be calibrated once every twelve months.

Continuously recording is defined for this condition as at least once every hour and is based on the average of the continuous monitoring for that hour.

Under any operating condition, including start-up, the maximum operating temperature shall not exceed 840°F.

The project owner shall install and maintain a temperature gauge to accurately indicate the temperature of the exhaust at the inlet to the SCR reactor. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months. The project owner shall also install and maintain a device to continuously record the parameter being measured. The catalyst temperature range shall remain between 715 degrees F and 840 degrees F, except during start-up and shutdown periods defined under Condition of Certification AQ-3.

For the purpose of this condition, continuously record shall be defined as recording at least once every hour and shall be calculated based upon the average of the continuous monitoring for that hour.

Verification: The project owner shall submit to the CPM no less than 30 days after installation, a written statement by a California registered Professional Engineer stating that said engineer has reviewed the as-built-designs or inspected the identified equipment and certifies that the appropriate device has been installed and is functioning properly. The project owner shall submit annual calibration results within 30 days of their successful completion.
AQ-14 The operator shall install and maintain a pressure gauge and recorder to accurately indicate and record the pressure differential across the SCR catalyst bed in inches of water column. The gauge shall be accurate to within plus or minus 5 percent and shall be calibrated once every twelve months.

Continuously recording is defined for this condition as at least once every month and is based on the average of the continuous monitoring for that month.

Under any operating condition, including start-up, the maximum operating pressure shall not exceed 12 inches of water.

The project owner shall install and maintain a pressure gauge to accurately indicate the differential pressure across the SCR catalyst bed in inches of water column. The project owner shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months. The pressure drop across the catalyst shall not exceed 12 inches of water column.

For the purpose of this condition, continuously record shall be defined as measuring at least once every month and shall be calculated based upon the average of the continuous monitoring for that month.

Verification: The project owner shall submit to the CPM no less than 30 days after installation, a written statement by a California registered Professional Engineer stating that said engineer has reviewed the as-built-designs or inspected the identified equipment and certifies that the appropriate device has been installed and is functioning properly. The project owner shall submit annual calibration results within 30 days of their successful completion.

AQ-15 The project owner shall limit the operating time of the firewater pump to no more than 199.99 hours per year. The firewater pump shall be equipped with a non-resettable elapsed meter to accurately indicate the elapsed operating time of the engine. The firewater pump shall be equipped with a non-resettable totalizing fuel meter to accurately indicate the fuel usage of the engine. The firewater pump shall burn only diesel fuel that contains sulfur compounds less than or equal to 15 ppm by weight.

The project owner shall operate and maintain the firewater pump according to the following requirements:

- This equipment shall only operate if utility electricity is not available.
- This equipment shall only be operated for the primary purpose of providing a backup source of power to drive an emergency fire pump.
- This equipment shall only be operated for maintenance and testing, not to exceed 50 hours in any one year.
- This equipment shall only be operated under limited circumstances under a Demand Response Program (DRP).
An engine operating log shall be kept in writing, listing the date of operation, the elapsed time, in hours, and the reason for operation. The log shall be maintained for a minimum of 5 years and made available to AQMD personnel and CPM upon request.

The project owner shall keep records in a manner approved by the Executive Officer; consisting of the date of operation, the elapsed time in hours, and the reason for operation.

The project owner shall limit the operating time of the firewater pump to no more than 200 hour(s) in any one year. For the purpose of this condition, the operating time is inclusive of time allotted for maintenance and testing.

The project owner shall limit the operating time to no more than 50 hour(s) in any one year. For the purpose of this condition, the operating time is inclusive of time allotted for maintenance and testing. Notwithstanding the requirement in this condition operating this engine beyond the 50 hours per year allotted for engine maintenance and testing purposes shall be allowed only if necessary to comply with the testing requirements of the national fire protection association (NFPA) 25 - "standard for the inspection, testing, and maintenance of water-based fire protection systems," 2002 edition or the most current edition.

The project owner shall install and maintain a non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine. The project owner shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The project owner shall install and maintain a non-resettable totalizing fuel meter to accurately indicate the fuel usage of the engine. The project owner shall also install and maintain a device to continuously record the parameter being measured.

The project owner shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

On or before January 15th of each year, the project owner shall record in the engine operating log:

A. The total hours of engine operation for the previous calendar year, and

B. The total hours of engine operation for maintenance and testing for the previous calendar year.

The project owner shall also keep records, in a manner approved by the District, for the following parameter(s) or item(s):
A. Emergency use

B. Maintenance and testing

C. Other (be specific)

In addition, for each time the engine is manually started, the log shall include the date of engine operation, the specific reason for operation, and the totalizing hour meter reading (in hours and tenths of hours) at the beginning and the end of the operation.

Engine operation log(s) shall be retained on site for a minimum of five calendar years and shall be made available to the Executive officer or representative and the CPM upon request.

Verification: The project owner shall submit to the CPM no less than 30 days after installation, a written statement by a California registered professional engineer stating that said engineer has reviewed the as-built-designs or inspected the identified equipment and certifies that the appropriate devices have been installed and are functioning properly. The project owner shall submit all dates of operation, elapsed time in hours, and the reason for each operation in the Quarterly Operations Report (AQ-SC10).

AQ-16 The project equipment shall not be operated unless the project owner demonstrates to the SCAQMD Executive Officer that the facility holds sufficient RTCs to offset the prorated annual emissions increase for the first compliance year of operation. In addition, this equipment shall not be operated unless the project owner demonstrates to the Executive Officer that, at the commencement of each compliance year after the first compliance year of operation, the facility hold sufficient RTCs in an amount equal to the annual emission increase. The project owner shall submit all such information to the CPM for approval. To comply with this condition, for each individual gas turbine, the project owner shall hold a minimum of 43,682 lbs/year of NOx RTCs and 2,280 lbs/year of SOx RTCs for the first year of operation (commissioning year) and 35,240 lbs/year of NOx RTCs and 2,280 lbs/year of SOx RTCs thereafter (operating year). In addition, for the emergency fire pump the project owner shall hold a minimum of 218 lbs/year of NOx RTCs for both commissioning year and operating years.

Each of the turbines shall not be operated unless the facility holds 43,682 pounds of NOx RTCs and 2,280 pounds of SOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. The emergency fire pump shall not be operated unless the facility holds 218 pounds of NOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. The RTCs held to satisfy the first year of operation portion of this condition may be transferred only after one year from the initial start of operation. In addition, each of the turbines shall not be operated unless the project owner demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 35,240
pounds of NOx RTCs and 2,280 pounds of SOx RTCs valid during that compliance year. The emergency fire pump shall not be operated unless the project owner demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 218 pounds of NOx RTCs valid during that compliance year. RTCs held to satisfy the compliance year portion of this condition may be transferred only after the compliance year for which the RTCs are held. If the initial or annual hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

**Verification:** The project owner shall submit all identified evidence demonstrating compliance to the CPM on an annual basis as part of the annual compliance report.

**AQ-17 (Deleted)** The project owner shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

**Verification:** The project owner shall make the site available for inspection representatives of the District, ARB and the Commission.

**AQ-18** The project owner shall limit the operating time for each combustion turbine to no more than 4,000 hours in any one year. For the purposes of this condition, one year shall be defined as any time that fuel is being combusted for any purpose in the combustion turbine train. One year is defined as a period of twelve (12) consecutive months determined on a rolling basis with a new twelve month period beginning on the first day of each calendar month. The operator shall install and maintain a non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine. The measuring device or gauge shall be accurate to plus or minus 5 percent. The measuring device or gauge shall be calibrated once every 12 months.

**Verification:** The project owner shall submit to the CPM for review a record of the time of use for all fuel use on a quarterly basis as part of the quarterly emissions report of Condition of Certification **AQ-SC10**.
AQ-19 The project owner shall not start operation of any equipment except emergency Internal combustion engine (ICE) device until both boiler units 3 and 4 currently located at AES Huntington Beach Generating Station have been retired and permits for boilers 3 and 4 have been surrendered to the SCAQMD.

**Verification:** The project owner shall provide by email and post to the U.S. mail evidence demonstrating that they have surrendered the permits to operate for Huntington Beach boilers 3 and 4 prior to the first turbine fire. The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission. In addition, the project owner shall make Huntington Beach boiler units 3 and 4 available for inspection to confirm shutdown of these boilers by representatives of the District, CARB, EPA and the Commission.

**AQ-18** The turbines are subject to the applicable requirements of the following rules or regulations:

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Rule/Subpart</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>40CFR60, SUBPART</td>
</tr>
<tr>
<td>SOx</td>
<td>40CFR60, SUBPART</td>
</tr>
</tbody>
</table>

**Verification:** The project owner shall make the site available for inspection representatives of the District, CARB and the Commission.

**AQ-19** The emergency fire pump is subject to the applicable requirements of the following rules or regulations:

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Rule/Subpart</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>District Rule</td>
</tr>
<tr>
<td>Sulfur compounds</td>
<td>District Rule</td>
</tr>
<tr>
<td>Sulfur compounds</td>
<td>40CFR60, SUBPART</td>
</tr>
<tr>
<td>Sulfur compounds</td>
<td>District Rule</td>
</tr>
</tbody>
</table>

**Verification:** The project owner shall make the site available for inspection representatives of the District, CARB and the Commission.

**AQ-20** The project owner shall vent the ammonia storage tank, during filling, only to the vessel from which it is being filled.

**Verification:** The project owner shall make the site available for inspection representatives of the District, CARB and the Commission.

**AQ-21** The project owner shall operate and maintain all equipment according to the following specifications:
In accordance with all mitigation measures stipulated in the final California Energy Commission decision for the 05-AFC-02 project.

**Verification:** The project owner shall make the site available for inspection representatives of the District, CARB and the Commission.

**AQ-22** The project owner shall comply with the following requirements:
The project owner shall comply with the emission standards specified in 40 CFR 60.4205(B) by purchasing an engine certified to the emission standards in 40 CFR 60.4205(B), as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission related specifications.

Verification: The project owner shall make the site available for inspection representatives of the District, CARB and the Commission.

AQ-23 The project owner shall comply with the following requirements:
The project owner shall operate and maintain the stationary engine and control device according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.

Verification: The project owner shall make the site available for inspection representatives of the District, CARB and the Commission.

CONCLUSIONS AND RECOMMENDATIONS

The staff proposed project changes would conform with applicable federal, state, and SCAQMD air quality LORS, and the amended project would not cause significant adverse air quality impacts, provided that the above conditions are included. Staff recommends that the revised conditions be approved as shown above.
REFERENCES


WCE 2017 - Walnut Creek Energy, LLC. Petition for Minor Modification #10. October
INTRODUCTION

On October 4th, 2017, the Walnut Creek Energy, LLC (WCE) filed a petition with the California Energy Commission requesting to amend the conditions of certification for the Walnut Creek Energy Park (WCEP 2017). The requested changes include a minor change to Worker Safety-5 (WS-5). Staff found this change consistent with all applicable laws, ordinances, regulations and standards (LORS) and would not result in any significant environmental impacts or impacts to worker safety.

BACKGROUND

WCEP was certified on February 27, 2008, and is a 500-megawatt simple-cycle gas-fired peaking power plant. The project commenced operation on May 1, 2013. WCEP is located at 911 Bixby Drive in the City of Industry in Los Angeles County, California. The requested change is as follows:

WORKER SAFETY-5 The project owner shall ensure that a portable automatic cardiac defibrillator is located on site during construction and operations and shall implement a program to ensure that the equipment is properly maintained and functioning at all times and that for each shift on-site personnel shall be trained in the American Heart Association's Heartsaver Automatic External Defibrillator (AED) Course, or equivalent, as follows:

Construction: minimum 4 personnel per shift, including one security guard,
Operation: minimum 2 personnel per shift, including one security guard.

Verification: Verification: At least 30 days prior to the start of site mobilization the project owner shall submit to the CPM proof that a portable automatic cardiac defibrillator exists on site and a copy of the training and maintenance program for review and approval.

WCE no longer employs a security guard, and therefore, cannot satisfy Condition of Certification WS-5. Approval of the proposed change would not have an impact on power plant worker safety, and it would provide consistency with the approved security plan. The amended condition would still require that at least 2 personnel per shift would have training in operation of the AED. Hazardous Materials Condition of Certification HAZ-9 is not affected by the proposed change.
September 28, 2017

Dale Rundquist
Compliance Project Manager
Siting, Transmission and Environmental Protection
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Subject: Walnut Creek Energy Park (Docket No. 05-AFC-2C)
Petition for Minor Modification #10 – AQ-4, AQ-7 and WS-5

Dear Mr. Rundquist,

Walnut Creek Energy, LLC (WCE) petitions the California Energy Commission (CEC) to modify the Final Decision for the Walnut Creek Energy Park (WCEP) (05-AFC-02C) issued on February 27, 2008. WCE has prepared this Petition to Amend (Petition) in order to obtain the CEC’s authorization for minor revisions to Air Quality Conditions of Certification (COC) AQ-4 and AQ-7 and Worker Safety COC WS-5. The Air Quality COC revisions are requested in order to ensure consistency with proposed changes to the Title V Permit submitted to South Coast Air Quality Management District (SCAQMD) originally on January 21, 2016 and June 28, 2016, and again on September 28, 2017. WCE is requesting a correction to the ammonia emission limit (i.e., change 5.0 to 5 ppm) in COC AQ-4 and believes that the proposed change is consistent with other like permit conditions for gas turbines permitted in the Los Angeles Basin. Additionally, WCE is requesting clarifying language be added to COC AQ-7 regarding the PM10 and PM2.5 source tests that the operating load of 100 percent for PM10 emission tests also applies to PM2.5 emission tests. Furthermore, WCE is requesting a minor modification to COC WS-5 which currently requires training of a security guard to use an AED device. WCEP does not have on-site security guards nor are they required per the CEC approved Operations Security Plan. Thus, WCE is requesting a modification to the language of COC WS-5 which will ensure consistency with the requirements of the Operations Security Plan. This Petition has been prepared in accordance with California Code of Regulations, Title 20, Public Utilities and Energy, Section 1769.

With adherence to the Conditions of Certification, the WCEP, as modified, will not cause significant adverse impacts to the environment and will not cause environmental impacts substantially different than those addressed in the Commission Decision.

Should you have any questions or require additional information related to this submittal, please contact me at (626) 986-0370.
Sincerely,

Rick McPherson  
Plant Manager

Attachments

WCEP O&M File: 3.3.2.2

cc: George Plantka, NRG Energy, Inc.  
    Heather MacLeod, NRG Energy, Inc.
In the Matter of:

WALNUT CREEK ENERGY PARK
WALNUT CREEK ENERGY, LLC

Docket No. 05-AFC-02C

PETITION TO AMEND FINAL DECISION

WALNUT CREEK ENERGY, LLC’S
PETITION TO AMEND THE FINAL DECISION
FOR THE WALNUT CREEK ENERGY PARK

September 28, 2017

Prepared by
Trinity Consultants/Sierra Research
1801 J Street
Sacramento, CA 95811
Phone: (916) 444-6666

Consultant for WALNUT CREEK ENERGY, LLC
STATE OF CALIFORNIA ENERGY
RESOURCES CONSERVATION
AND DEVELOPMENT
COMMISSION

In the Matter of: Docket No. 05-AFC-02C

WALNUT CREEK ENERGY PARK
WALNUT CREEK ENERGY, LLC

PETITION TO AMEND FINAL DECISION

WALNUT CREEK ENERGY, LLC'S PETITION TO AMEND
THE FINAL DECISION FOR THE
WALNUT CREEK ENERGY PARK
(Amendment #10)

I. INTRODUCTION

Petitioner, and Project Owner, Walnut Creek Energy, LLC (Petitioner), submits this
Petition to Amend the Final Decision for the Walnut Creek Energy Park (WCEP or Project).
The California Energy Commission (CEC or Commission) issued its Final Decision on
February 27, 2008. WCEP, a nominal 500 megawatt (MW) simple-cycle power plant, began
commercial operations in May 2013 and is located in the City of Industry, within Los Angeles
County, California.

The purpose of this Petition is to request that Commission Staff approve corrections to
references to the ammonia emission (i.e., “slip”) limit in Air Quality Condition of Certification
(COC) AQ-4 (hereinafter referred to as Condition AQ-4). The modification to COC AQ-4 will
ensure consistency with proposed changes to the Title V Permit submitted to South Coast Air
Quality Management District (SCAQMD) originally on June 28, 2016 and again on September
Furthermore, Petitioner requests that Commission Staff approve changes to COC AQ-7 pertaining to PM$_{10}$ and PM$_{2.5}$ source testing requirements. The proposed modification to COC AQ-7 would ensure consistency with proposed changes to the Title V Permit submitted to the South Coast Air Quality Management District (SCAQMD) originally on January 21, 2016 and again on September 28, 2017.

In addition, Petitioner proposes a minor change to COC WorkerSafety-5. The proposed change would modify the list of on-site operations personnel who are required to be trained to use the facility’s portable automatic external defibrillator (AED) device. The current language in COC WorkerSafety-5 requires that “one security guard” be trained to use the AED device. However, the CEC approved Operations Security Plan, as required per COC HAZ-9, allows for security measures that do not include full-time on-site security guards. As such, Petitioner does not employ security guards for WCEP. To ensure consistency with the Project’s Operations Security Plan and HAZ-9, and to clarify WorkerSafety-5, Petitioner proposes to strike certain language from WorkerSafety-5, as described in more detail below.

II. **Summary of Proposed Changes**

A. **Proposed Modifications to Conditions AQ-4 and AQ-7**

On January 21, 2016, Petitioner submitted a Permit application to the SCAQMD requesting several changes to the Title V Permit for the WCEP as part of the Title V renewal (See Attachment 1: January 21, 2016 Application to Amend Title V Permit). On June 28, 2016 an additional change to the Title V Permit for the WCEP was requested of the SCAQMD (See Attachment 2: June 28, 2016 Request to SCAQMD). On July 6, 2017 the SCAQMD processed the Title V Permit renewal; however, the requested changes were deferred. The SCAQMD

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1 To ensure the safety and security of WCEP, the specifics of the Operations Security Plan are not set forth in detail herein.

2 Proposed changes to Conditions of Certification are shown in **bold, underlined** text (for additions) or **strike-through** text (for deletions).
intends to reopen the Title V Permit to remove construction and commissioning related permit conditions presently in Section H (Permit to Construct/Temporary Permit to Operate) and move operations associated permit conditions from Section H to Section D (Permit to Operate). SCAQMD has therefore asked that we resubmit the change requests (See Attachment 3: September 28, 2017 Request to SCAQMD). The following is a brief summary of these requested changes filed with SCAQMD, most of which do not require changes to the CEC license for WCEP:

- Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Section H, Permit Condition D12.6 for Device Number D34) (*no change to Conditions of Certification in WCEP license*);

- Clarification that the inlet temperature requirements for the Selective Catalytic Reduction (SCR) do not apply during startup and shutdown periods (Section H, Permit Condition D12.3 for Device Numbers C4, C10, C16, C22 and C28) (*no change to Conditions of Certification in WCEP license*);

- Addition of applicable conditions from 40 CFR 60, Subpart III for the emergency fire pump engine (*no change to Conditions of Certification in WCEP license*);

- Correction to the ammonia emission (i.e., "slip") limit from 5.0 parts per million (ppm) to 5 ppm, which is consistent with like permit conditions for gas turbines permitted in the Los Angeles Basin and in California, in general (Section H, Permit Condition A195.4 for Device Numbers C4, C10, C16, C22 and C28) (*proposed change to COC AQ-4 addressed in this Petition*); and

- Clarification that the operating load of 100 percent for PM$_{10}$ emission tests also applies to PM$_{2.5}$ emission tests (Section H, Permit Condition D29.3 for Device Numbers D1, D7, D13, D19 and D25) (*proposed change to COC AQ-7 addressed in this Petition*).
The Petitioner requests a correction to the ammonia emission limit (i.e., change 5.0 to 5 ppm) in COC AQ-4 to make the Condition consistent with the Title V Permit change request submitted to the SCAQMD, and the Petitioner requests clarifying language be added to COC AQ-7 regarding the PM$_{10}$ and PM$_{2.5}$ source tests. Specific changes to the respective COCs are presented in Section III below. The proposed changes to COCs AQ-4 and AQ-7 will not affect operating conditions or emission limits for the respective gas turbines, nor affect any other emission and/or operating limits or testing conditions for the gas turbines. To that end, the Petitioner respectfully requests approval of the requested changes to COCs AQ-4 and AQ-7, as set forth in Section III below.

**B. Proposed Modification to WorkerSafety-5**

Petitioner requests a minor modification to COC Worker Safety-5, which currently requires training of a security guard to use an AED device. Specifically, WorkerSafety-5 focuses on assurance that an AED is on site at all times and that operations personnel are properly trained to use the AED. The Condition identifies those operations personnel to be trained as being “minimum 2 personnel per shift, including one security guard.” Security measures for WCEP, as set forth in the CEC approved Operations Security Plan, do not require on-site security guards. As such, Petitioner does not employ security guards for WCEP.$^3$

The requested modification to COC WorkerSafety-5 will ensure consistency between the requirements of the approved Operations Security Plan and WorkerSafety-5. This proposed minor change to WorkerSafety-5 will not affect the safety and security of WCEP, its employees, or the public. To that end, Petitioner respectfully requests approval of the minor modification to Condition WorkerSafety-5, as set forth in further detail below.

**III. INFORMATION REQUIRED PURSUANT TO CALIFORNIA CODE OF REGULATIONS SECTION 1769**

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$^3$ The Operations Security Plan, dated August 16, 2012, was approved by the CEC on December 20, 2012.
A. Complete description of the proposed modifications, including new language for any conditions that will be affected. (Section 1769(a)(1)(A).)

1. Proposed Modifications to Condition of Certification AQ-4.

The proposed modification to COC AQ-4 would change the ammonia emission (i.e., "slip") limit from 5.0 ppm to 5 ppm. Specific changes to the Condition are shown below in **bold underlined** text:

**AQ-4:** The 2.5 ppm NOx emissions limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

The 4.0 ppm CO emission limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

The 2.0 ppm VOC emission limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

The 5.0 **5** ppm NH3 emission limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

**Verification:** The project owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report of Condition of Certification AQ-SC10.


The proposed modifications will clarify PM$_{10}$ and PM$_{2.5}$ emission source test requirements in COC AQ-7. Specifically, the proposed language addresses testing conditions and methods for the PM$_{10}$ and PM$_{2.5}$ emission source test. Proposed modifications to COC AQ-7 are included below in **bold underlined** text.

**AQ-7:** The project owner shall conduct an initial source test for NOx, CO, SOx, VOC, NH$_3$ and PM10 and a periodic source test every three years thereafter for NOx, CO, SOx, VOC, PM$_{2.5}$, and PM10 of each gas turbine exhaust stack in accordance with the following requirements:

- The project owner shall submit a source test protocol to the District and the CPM 45 days prior to the proposed source test date for approval. The protocol shall include the proposed operating conditions of the gas turbine, the identity of the testing lab, a statement from the lab certifying that it meets the criteria...
of District Rule 304, and a description of all sampling and analytical procedures.

- The initial source test shall be conducted no later than 180 days following the date of first fire.

- The District and CPM shall be notified at least 10 days prior to the date and time of the source test.

- **With the exception of PM10 and PM2.5 testing**, the source test shall be conducted with the gas turbine operating under maximum, average and minimum loads. **For PM10 and PM2.5, the test shall be conducted with the gas turbine operating at maximum load.**

- The source test shall be conducted to determine the oxygen levels in the exhaust.

- The source test shall measure the mass flow rate in lb/hr, fuel flow rate, the flue gas flow rate and the turbine generating output in MW.

- The source test shall be conducted for the pollutants listed using the methods, averaging times, and test locations indicated and as approved by the CPM:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Method</th>
<th>Averaging Time</th>
<th>Test Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>District Method 100.1</td>
<td>1 hour</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>CO</td>
<td>District Method 100.1</td>
<td>1 hour</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>SOx</td>
<td>District Method 307-91</td>
<td>District approved averaging time</td>
<td>Fuel Sample</td>
</tr>
<tr>
<td>VOC</td>
<td>District Method 25.3</td>
<td>1 hour</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>PM10 (and as a surrogate for PM2.5)</td>
<td>District Method 5</td>
<td>4 hours</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>PM2.5</td>
<td>EPA Method 201A and 202</td>
<td>4 hours</td>
<td>Outlet of SCR</td>
</tr>
<tr>
<td>Ammonia</td>
<td>District Methods 5.3 and 207.1 or EPA Method 17</td>
<td>1 hour</td>
<td>Outlet of SCR</td>
</tr>
</tbody>
</table>

- The source test results shall be submitted to the District and the CPM no later than 60 days after the source test was conducted.

- All emission data is to be expressed in the following units:
– ppmv corrected to 15% oxygen dry basis,

– pounds per hour,

– pounds per million cubic feet of fuel burned and

– additionally, for PM10 only, grains per dry standard cubic feet of exhaust gas fuel burned.

- Exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute and dry actual cubic feet per minute.

- All moisture concentrations shall be expressed in terms of percent corrected to 15 percent oxygen.

**Verification:** The project owner shall submit the proposed protocol for the initial source tests 45 days prior to the proposed source test date to both the District and CPM for approval. The project owner shall submit source test results no later than 60 days following the source test date to both the District and CPM. The project owner shall notify the District and CPM no later than 10 days prior to the proposed initial source test date and time.

3. **Proposed Modification to Condition of Certification Worker Safety-5**

As summarized above, Petitioner requests a minor modification to COC Worker Safety-5, which currently requires that operations personnel, “including one security guard,” be trained to use a portable AED device. The COC identifies on-site personnel during operations as being “minimum 2 personnel per shift, including one security guard.” (See 2008 Final Decision at p. 292.) As noted in the Petitioner’s approved Operations Security Plan (submitted in compliance with COC HAZ-9 and approved by the CEC Compliance Project Manager on December 20, 2012), the Petitioner provides for security measures including, but not limited to, perimeter fencing, a main entrance security gate, power plant personnel on-site 24 hours per day, 7 days per week, in addition to a closed-circuit TV monitoring system, perimeter cameras, and perimeter breach detectors. The Petitioner does not employ full-time, on-site security guards as
noted in the approved Operations Security Plan, and per the Final Decision, on-site security personnel are not required. (See 2008 Final Decision, Condition HAZ-9 at pp. 103-104.)

The requested modification to COC WorkerSafety-5 will ensure consistency between the requirements of the approved Operations Security Plan (HAZ-9) and WorkerSafety-5 and will not affect the safety and security of WCEP, its employees, or the public.

**WORKER SAFETY-5** The project owner shall ensure that a portable automatic cardiac defibrillator is located on site during construction and operations and shall implement a program to ensure that the equipment is properly maintained and functioning at all times and that for each shift on-site personnel shall be trained in the American Heart Association’s Heartsaver Automatic External Defibrillator (AED) Course, or equivalent, as follows:

Construction: minimum 4 personnel per shift, including one security guard,  
Operation: minimum 2 personnel per shift, including one security guard.

**Verification:** At least 30 days prior to the start of site mobilization the project owner shall submit to the CPM proof that a portable automatic cardiac defibrillator exists on site and a copy of the training and maintenance program for review and approval.

**B. The Necessity for the Proposed Modification. (Section 1769(a)(1)(B).)**

Section 1769(a)(1)(B) requires a discussion of the necessity of the proposed modifications. As further described in Attachment 2, the proposed change to COC AQ-4 is consistent with other like permit conditions for gas turbines permitted in the Los Angeles Basin such as AES Huntington Beach, El Segundo Energy Center and CPV Sentinel. The Petitioner believes that these Permits represent that the Best Available Control Technology (BACT) limit for ammonia slip has been demonstrated to be 5 ppm. Furthermore, the proposed change will ensure consistency with other references to the ammonia emissions limit throughout the CEC Final Decision for the WCEP which state 5 ppm. The proposed changes to COC AQ-7 are necessary to address the specific testing conditions and testing methods for PM$_{10}$ and PM$_{2.5}$ emissions and to ensure consistency with the requested revisions to the SCAQMD Title V
Permit. The proposed modifications to COCs AQ-4 and AQ-7 will not affect the WCEP emissions or operating limits specified in the Project's COCs.

In addition, as described above, WCEP does not have on-site security guards nor are they required per the approved Operations Security Plan. Therefore, the Petitioner seeks the proposed minor modification to COC WorkerSafety-5, which will ensure consistency with the requirements of HAZ-9 and the approved Operations Security Plan. The proposed changes to WorkerSafety-5 will not affect the safety and security of WCEP or its employees.

C. The Proposed Modifications Are Based Upon Information Previously Unknown to Petitioner. (Section 1769(a)(1)(C).)

Section 1769(a)(1)(C) requires a discussion of whether the proposed changes are based on information previously known by Petitioner. In this case, the proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 were previously unknown to Petitioner. Specifically with regard to the proposed modification to COC AQ-4, the Petition is in response to a request for minor changes to the Title V Permit that was recently submitted to SCAQMD. The proposed corrections will ensure consistency with like conditions for other gas turbines permitted in the Los Angeles Basin, in addition to, the other references made to the ammonia emission limit in the CEC Final Decision and the Title V Permit.

With regard to the proposed modification to COC AQ-7, the Petition is based on an application recently submitted to the SCAQMD requesting minor changes to the Title V Permit, which clarifies language pertaining to PM\textsubscript{10} and PM\textsubscript{2.5} emission source test requirements. The proposed changes are necessary to ensure consistency with the recently submitted Permit application requesting changes to the SCAQMD Title V Permit.

As to the proposed modification to COC WorkerSafety-5, the Condition includes the term "security guard" within the Condition as one of the on-site personnel required to be trained to use an AED device. Pursuant to the approved Operations Security Plan, on-site
security guards during plant operations are not required, as other security measures are in place and WCEP is in compliance with those approved security measures. (See 2008 Final Decision, Condition HAZ-9 at pp. 103-104.) The proposed minor modification to COC WorkerSafety-5 will ensure consistency with the requirements of HAZ-9 and the approved Operations Security Plan and will not affect the safety and security of WCEP or its employees.

D. **The Proposed Modifications Do Not Change or Undermine the Assumptions, Rationale, or Other Bases of the Final Decision. (Section 1769(a)(1)(D).)**

The proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 do not change or undermine the assumptions, rationale, or other bases of the Final Decision approving WCEP, or the Commission’s subsequent amendments of the Final Decision. The proposed modifications are necessary to ensure consistency with the respective Title V permit and operations plans submitted to satisfy the respective COCs.

E. **An Analysis of the Impacts the Proposed Modifications May Have on the Environment and Proposed Measures to Mitigate Any Significant Adverse Impacts (Section 1769(a)(1)(E).)**

The proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 will not have a significant adverse impact on the environment because none of the proposed modifications change any of the emission or operating limits specified in the WCEP Final Decision, or subsequent amendments; nor will the proposed modifications affect security measures already in place at WCEP.

F. **The Impacts of the Modification of the Facility’s Ability to Comply with Applicable LORS (Section 1769(a)(1)(F).)**

The proposed modifications will not impact WCEP’s ability to comply with all applicable laws, ordinances, regulations, or standards (“LORS”). The proposed modifications do not change any of the emission and/or operating limits specified in the Conditions of Certification—they simply provide a correction to the ammonia emissions limit in COC AQ-4
and clarification language to COC AQ-7 pertaining to PM$_{10}$ and PM$_{2.5}$ emission source test requirements. Moreover, the proposed modifications to COC WorkerSafety-5 simply provide clarification as to personnel required to be trained to use the facility’s on-site AED device. The clarification to COC WorkerSafety-5 will not impact WCEP’s ability to comply with all LORS.

G. **How the Proposed Modifications May Affect the Public (Section 1769(a)(1)(G).)**

The proposed modification to COC AQ-4 simply provides a correction to the ammonia emission limit from 5.0 ppm to 5 ppm. The proposed modifications to COC AQ-7 simply provide clarification language pertaining to PM$_{10}$ and PM$_{2.5}$ emission source test requirements. The proposed modification to COC WorkerSafety-5 clarifies the operations personnel required to be trained to use the facility’s on-site AED device. As such, none of the proposed modifications will affect the public as the revisions will not change any of the emissions and/or operating limits specified in the Conditions of Certification, nor will the minor modifications impact the safety and security of WCEP.

H. **Potential Effect on Property Owners, the Public, and the Parties to the Application Proceeding (Section 1769(a)(1)(H) and (Section 1769(a)(1)(I)..)**

Nearby property owners, the Public, and Parties to the Application Proceeding will not be affected by the proposed modifications since these changes will not change the emissions and/or operating limits specified in the Conditions of Certification. The proposed modifications provide a correction to the ammonia emissions limit in COC AQ-4, clarification language to COC AQ-7 pertaining to PM$_{10}$ and PM$_{2.5}$ emission source test requirements, as well as a minor modification to COC WorkerSafety-5 to clarify the personnel required to receive training to use the on-site AED device. Given there are no potentially affected property owners, a list is not included.
IV. CONCLUSION

For all the reasons above, Petitioner respectfully requests that the Commission approve the proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 for the Walnut Creek Energy Park.
Attachment 1
Application to Amend Title V Permit
(January 21, 2016)
January 19, 2016

Brian L. Yeh  
Sr. Air Quality Engineering Manager  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182

Subject: Walnut Creek Energy Park - Facility ID 146536  
RECLAIM/Title V Facility Permit

Dear Mr. Yeh:

Walnut Creek Energy, LLC (WCE) is pleased to submit the enclosed District application forms requesting changes to conditions in the RECLAIM/Title V permit for the Walnut Creek Energy Park (WCEP) issued on May 4, 2012. We are requesting the following changes to the RECLAIM/Title V permit:

- Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Section H, Permit Conditions D12.6 for Device Number D34);

- Clarification that the inlet temperature requirements for the Selective Catalytic Reduction (SCR) do not apply during startup and shutdown periods (Section H, Permit Conditions D12.3 for Device Numbers C4, C10, C16, C22 and C28);

- Clarification that the operating load of 100 percent for PM10 emission tests also applies to PM2.5 emission tests (Section H, Permit Conditions D29.1 for Device Numbers D1, D7, D13, D19 and D25); and

- The addition of some applicable conditions from 40 CFR 60, Subpart IIII for the emergency fire pump engine.

The requested changes of conditions are discussed in more detail below.


The RECLAIM/Title V Facility Permit (Section H, Permit Condition D12.6) includes a calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Device number D34). To comply with the requirement, the totalizing fuel meter on the emergency fire pump Diesel engine must be removed and taken offsite to a laboratory for calibration. When the fuel meter is removed, the fire pump engine cannot be operated, which poses a certain risk to the facility if an emergency should occur.
Therefore, WCE requests that the calibration be removed from the permit condition. Because the change has no impact on emissions associated with any other permit requirements (i.e., emission limits, operating limits, monitoring/testing requirements, reporting requirements, etc.), WCE believes this change qualifies as a change of condition with no engineering evaluation needed under Rule 301\textsuperscript{1} for fee purposes and qualifies as a minor Title V change under Regulation XXX\textsuperscript{2}. The requested change to Permit Condition D12.6 is as follows:

\textit{D12.6 The operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage of the engine.}

\begin{quote}
The operator shall also install and maintain a device to continuously record the parameter being measured.
\end{quote}

\begin{quote}
The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.
\end{quote}

**Clarification Regarding SCR Operating Temperature**

The RECLAIM/Title V Facility Permit (Section H, Permit Condition D12.3, Device Numbers C4, C10, C16, C22, and C28) currently limits the inlet temperature for the gas turbine SCRs to between 715°F and 840°F. This SCR operating temperature range is appropriate during normal gas turbine operation. However, during gas turbine startups or shutdowns, there will be brief periods of time when the inlet SCR temperature will not be within the required temperature range. Therefore, WCE requests that a clarification be added to permit condition D12.3 to exclude gas turbine startups/shutdowns from this SCR operating temperature requirement. Because this change will have no impact on other permit requirements (i.e., emission limits, operating limits, monitoring/testing requirements, reporting requirements, etc.), WCE believes this change qualifies as a change of condition with no engineering evaluation needed under Rule 301\textsuperscript{1} for fee purposes and qualifies as a minor Title V change under Regulation XXX\textsuperscript{2}. The requested change to Permit Condition D12.3 is as follows:

\textit{D12.3 The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the exhaust at the inlet to the SCR reactor.}

\begin{quote}
\textit{Excluding gas turbine startups and shutdowns,} the catalyst temperature range shall remain between 715 degrees F and 840 degrees F...
\end{quote}

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\textsuperscript{1} SCAQMD Rule 301(c)(3)(C)

\textsuperscript{2} SCAQMD Rule 3000(b)(15)
Clarification Regarding PM$_{2.5}$ Emission Tests

The RECLAIM/Title V Facility Permit (Section H, Permit Conditions D29.1 for Device Numbers D1, D7, D13, D19 and D25) currently states that source tests will be conducted when the equipment operates at 100, 75, and 50 percent loads, with the exception of PM$_{10}$ testing. PM$_{10}$ emission testing is required to be conducted only at 100 percent operating load. This exception is required for PM$_{10}$ testing due to the extended amount of sampling time for PM$_{10}$ source tests. Since PM$_{10}$ and PM$_{2.5}$ emission source tests require the same amount of sampling time, we believe that this exception should also apply to the PM$_{2.5}$ source tests. Therefore, WCE requests that a clarification be added to permit condition D29.1 to include PM$_{2.5}$ source testing in the exception. Because this change will have no impact on other permit requirements (e.g., emission limits, operating limits, monitoring/testing requirements, reporting requirements, etc.), WCE believes this change qualifies as a change of condition with no engineering evaluation needed under Rule 301 for fee purposes and qualifies as a minor Title V change under Regulation XXX. The requested change to Permit Condition D29.1 is as follows:

D29.1 The operator shall conduct source test(s) for the pollutant(s) identified below.

... The test shall be conducted when this equipment is operating at loads of 100, 75 and 50 percent, with the exception of PM$_{10}$ and PM$_{2.5}$ testing. For PM$_{10}$ and PM$_{2.5}$, the test shall be conducted when this equipment is operating at a load of 100 percent.

...


The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for stationary reciprocating internal combustion engines (RICE) (Subpart ZZZZ) apply to all RICE located at both major and area sources. Therefore, this rule applies to the emergency fire pump Diesel engine operated by WCE. The emergency fire pump Diesel CI engine has a maximum power rating of 183 bhp, and is certified as a Tier 3 engine by the EPA. Because the fire pump was installed at the WCEP in 2012, it is considered a new stationary RICE pursuant to 40 CFR 63.6590 (a)(2)(iii).

Under 40 CFR 63.6590(c), a new RICE located at an area source with a rating of less than or equal to 500 bhp is allowed to comply with NESHAP Subpart ZZZZ by complying with the applicable requirements of 40 CFR 60 Subpart IIII for compression ignition engines. The emergency fire pump Diesel engine at WCEP qualifies for this compliance option. A review of the current SCQAMD permit shows that most of the applicable requirements of 40 CFR Part 60, Subpart IIII for the emergency fire pump engine are already included as permit conditions. The only Subpart IIII requirement not specifically

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3 The fire pump engine is a certified Tier 3 engine under engine family CJDX306.8120.
4 40 CFR 63.6590 (a)(2)(iii) states that "a stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006."
required in the SCAQMD permit for the emergency fire pump engine is the use of ultra-
low sulfur Diesel fuel (40 CFR 60.4207). WCE proposes that for clarification purposes,
the Diesel fuel sulfur content be added to the permit conditions. Because this change
will have no impact on other permit requirements (i.e., emission limits, operating limits,
monitoring/testing requirements, reporting requirements, etc.), WCE believes this
change qualifies as a change of condition with no engineering evaluation needed under
Rule 301\(^1\) for fee purposes and qualifies as a minor Title V change under Regulation
XXX\(^2\). The requested additional permit condition is as follows:

*The operator shall not use any Diesel fuel unless the fuel is low sulfur Diesel for
which the sulfur content shall not exceed 15 ppm by weight as supplied by the
supplier.*

**Permit Application Fee**

Enclosed are the SCAQMD application forms for the requested changes to the permit
conditions. Also enclosed is a check in the amount of $8,343.03 payable to the District to
cover the filing fee for the requested permit change. The amount of this filing fee was
determined based on the SCAQMD’s online permit application filing fee calculator
(SCAQMD Fee Sheet is also included in Appendix I), as summarized below.

- Change of condition for SCR operating temperature for first SCR (change of
  condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule C, Re-Issuance
  Fee): $792.43

- Change of condition for SCR operating temperature for the remaining four SCR
  (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule C, Re-
  Issuance Fee, and 50% discount for each SCR for identical units per SCAQMD
  Rule 301(c)(1)(F)): $1,584.88

- Change of condition for PM\(_{2.5}\) source testing for first gas turbine (change of
  condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule G, Re-Issuance
  Fee): $792.43

- Change of condition for PM\(_{2.5}\) source testing for the remaining four gas turbines
  (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule G, Re-
  Issuance Fee, and 50% discount for each SCR for identical units per SCAQMD
  Rule 301(c)(1)(F)): $1,584.88

- Change of condition for the emergency fire pump engine for the removal of the
  calibration requirement for the fuel flow meter (change of condition per
  SCAQMD Rule 301(c)(3)(C), Equipment Schedule B, Re-Issuance Fee): $792.43

- Change of condition for the addition of the 40 CFR Part 60 Subpart III Diesel fuel
  sulfur requirement for the fire pump engine (change of condition per SCAQMD
  Rule 301(c)(3)(C), Equipment Schedule G, Re-Issuance Fee): $792.43
• Title V/RECLAIM permit change of conditions (Facility Permit Amendment for application with no engineering evaluation per SCAQMD Rule 301(l)(5)): $1,994.55

• Total fee required: $8,334.03

If you have any questions or need further information, please don’t hesitate to contact me at (626) 968-0360.

Sincerely,

Heather MacLeod
Environmental Specialist

Attachments

WCEP O&M File: 3.3.2.2

cc: Camille Remy Obad, CEC
    CEC Dockets (05-AFC-2C)
    Rick McPherson, NRG Energy
    George Piantka, NRG Energy
    Apeetha Jain, NRG Energy
    Tom Andrews, Sierra Research
ATTACHMENT I

SCAQMD APPLICATION FORMS AND FEE SHEET
Fee Sheet

Below are the permit fees calculated based on the information entered. Click the "Print" button to print the Fee Sheet for your records.

<table>
<thead>
<tr>
<th>Permit Unit</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>IC Engine, Emergency, 51 - 500 HP</td>
<td>$792.43</td>
</tr>
<tr>
<td>Permit Unit</td>
<td></td>
</tr>
<tr>
<td>IC Engine, Emergency, 51 - 500 HP</td>
<td>$792.43</td>
</tr>
<tr>
<td>Permit Unit</td>
<td></td>
</tr>
<tr>
<td>Selective Catalytic Reduction (SCR)</td>
<td>$792.43</td>
</tr>
<tr>
<td>Selective Catalytic Reduction (SCR) (4 Identical)</td>
<td>$1,584.88</td>
</tr>
<tr>
<td>Permit Unit</td>
<td></td>
</tr>
<tr>
<td>Gas Turbine, 50 MW, other fuel</td>
<td>$792.43</td>
</tr>
<tr>
<td>Gas Turbine, 50 MW, other fuel (4 Identical)</td>
<td>$1,584.88</td>
</tr>
<tr>
<td>Facility Permit Revision Fee</td>
<td></td>
</tr>
<tr>
<td>Administrative Permit Revision Fee</td>
<td>$1,994.55</td>
</tr>
</tbody>
</table>

**Summary**

<table>
<thead>
<tr>
<th>Description</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permit Fees</td>
<td>$6,339.48</td>
</tr>
<tr>
<td>Expedited Processing Fees</td>
<td>$0.00</td>
</tr>
<tr>
<td>Higher Fees</td>
<td>$0.00</td>
</tr>
<tr>
<td>Small Business Discount</td>
<td>$0.00</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>$8,334.03</strong></td>
</tr>
</tbody>
</table>
South Coast Air Quality Management District
Form 400-A
Application Form for Permit or Plan Approval
List only one piece of equipment or process per form.

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
   146536

Section B - Equipment Location Address
4. Equipment Location Is: ☐ Fixed Location ☐ Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City of Industry, CA 91745
   City
   Heather MacLeod
   Environmental Specialist
   Title
   (626) 968-0360
   Phone #
   E-Mail: Heather.Macleod@nrg.com
   Ext.
   Fax #

Section C - Permit Mailing Address
5. Permit and Correspondence Information:
   ☒ Check here if same as equipment location address
   911 Bixby Dr
   Address
   City of Industry, CA 91745
   City
   Heather MacLeod
   Environmental Specialist
   Title
   (626) 968-0379
   Phone #
   E-Mail: Heather.Macleod@nrg.com
   Ext.
   Fax #

Section D - Application Type
6. The Facility Is: ☐ Not In RECLAIM or Title V ☐ In RECLAIM ☐ In Title V ☐ In RECLAIM & Title V Programs
   7. Reason for Submitting Application (Select only ONE):

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location?
   electric generation
   Yes
   No

Section F - Authorization/Signature
17. Signature of Responsible Official: 
   Rick McPherson
20. Print Name:
   Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? (If Yes, see instructions.)
   ☐ No ☒ Yes
23. Check List:
   ☒ Authorized Signature/Date ☐ Form 400-CEQA ☐ Supplemental Form(s) (ie., Form 400-E-xx) ☐ Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
   146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address
4. Equipment Location Is:  
   ☑ Fixed Location  ☐ Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City of Industry, CA 91745
   City
   Heather MacLeod, Environmental Specialist
   Contact Name
   (626) 968-0360  (626) 968-0379
   Phone #  Ext.  Phone #  Ext.
   E-Mail: Heather.MacLeod@nrng.com
   City
   State  Zip
   Contact Name
   Title
   Phone #  Ext.
   E-Mail: Heather.MacLeod@nrng.com

Section C - Permit Mailing Address
5. Permit and Correspondence Information:
   ☑ Check here if same as equipment location address
   911 Bixby Dr
   Address
   City of Industry, CA 91745
   City
   Heather MacLeod, Environmental Specialist
   Contact Name
   Title
   (626) 968-0360  (626) 968-0379
   Phone #  Ext.
   E-Mail: Heather.MacLeod@nrng.com
   State  Zip
   Contact Name
   Title
   Phone #  Ext.
   E-Mail: Heather.MacLeod@nrng.com

Section D - Application Type
6. The Facility Is:
   ☑  Not In RECLAIM or Title V  ☐  In RECLAIM  ☐  In Title V  ☐  In RECLAIM & Title V Programs

7a. New Equipment or Process Application:
    ☐ New Construction (Permit to Construct)
    ☐ Equipment On-Site But Not Constructed or Operational
    ☐ Equipment Operating Without a Permit *
    ☐ Compliance Plan
    ☐ Certification
    ☐ Streamlined Standard Permit

7b. Facility Permits:
    ☐ Title V Application or Amendment (Refer to Title V Matrix)
    ☐ RECLAIM Facility Permit Amendment

7c. Equipment or Process with an Existing/Previous Application or Permit:
    ☐ Administrative Change
    ☐ Alteration/Modification
    ☐ Alteration/Modification without Prior Approval *
    ☐ Change of Condition
    ☐ Change of Location without Prior Approval *
    ☐ Equipment Operating with an Expired/Inactive Permit *
    ☐ A Higher Permit Processing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(B)(ii)).

8a. Estimated Start Date of Construction (mm/dd/yyyy):  8b. Estimated End Date of Construction (mm/dd/yyyy):  8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   Selective Catalytic Reduction for GT 1, Device C4
10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process)
   ☑ 4
11. Are you a Small Business as per AQMD’s Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
    ☐ No  ☐ Yes
   12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment?
       If Yes, provide NOVNC#:  
       ☑ No  ☐ Yes

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? (North American Industrial Classification System)
    221112
15. Are there other facilities in the SCAGMD jurisdiction operated by the same operator?
    ☑ No  ☐ Yes
16. Are there any schools (K-12) within 1000 feet of the facility property line?
    ☑ No  ☐ Yes

Section F - Authorization/Signature
I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official: 
    Rick McPherson
18. Title of Responsible Official: 
    Plant Manager
19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.)
    ☑ No  ☐ Yes
20. Print Name: Rick McPherson
    21. Date: 1/14/16
22. Do you claim confidentiality of data? (If Yes, see instructions.)
    ☑ No  ☐ Yes
23. Check List:
    ☑ Authorized Signature/Date  ☐ Supplemental Form(s) (i.e., Form 400-E-xx)  ☑ Fees Enclosed

AQMD USE ONLY
APPLICATION TRACKING #:  CHECK #:  AMOUNT RECEIVED:
PAYMENT TRACKING #:  VALIDATION:

DATE  APP. REJ.  DATE  APP. REJ.  CLASS  BASIC  EQUIPMENT CATEGORY CODE  TEAM  ENGINEER  REASON/ACTION TAKEN

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South Coast Air Quality Management District

Form 400-A
Application Form for Permit or Plan Approval
Only one piece of equipment or process per form.

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit):
Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
146536

Section B - Equipment Location/Address
4. Equipment Location is: ☐ Fixed Location ☐ Various Location
(For equipment operated at various locations, provide address of initial site.)
911 Bixby Dr
Street Address
City of Industry, CA 91745
City
Zip

Section C - Permit Mailing Address
5. Permit and Correspondence Information:
☑ Check here if same as equipment/location address
911 Bixby Dr
Address
City of Industry, CA 91745
City
State
Zip

Section D - Application Type
6. The Facility is: ☐ Not In RECLAIM or Title V ☐ In RECLAIM ☐ In Title V ☐ In RECLAIM & Title V Programs

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location?
electric generation

14. What is your business primary NACS Code?
(North American Industrial Classification System) 221112

Section F - Authorization/Signature
17. Signature of Responsible Official:
Jack McPherson

20. Print Name: Rick McPherson
21. Date: 1/14/16

22. Do you claim confidentiality of data? (If Yes, see instructions.) ☐ No ☐ Yes

23. Check List: ☑ Authorized Signature/Date ☑ Form 400-CEQA ☑ Supplemental Form(s) (ie., Form 400-E-xx) ☑ Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
Form 400-A
Application Form for Permit or Plan Approval
List only one piece of equipment or process per form.

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
   146536

3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address

4. Equipment Location Is:
   - [ ] Fixed Location
   - [ ] Various Location
   (For equipment operated at various locations, provide address of initial site.)
   - 911 Bixby Dr
     Street Address
     City of Industry, CA 91745
     City
     Heather MacLeod, Environmental Specialist
     Contact Name
     (626) 968-0360
     Phone #
     Ext. (626) 968-0379
     Fax #
     E-Mail: Heather.Macleod@nrg.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:
   - [ ] Check here if same as equipment location address
   - 911 Bixby Dr
     Address
     City of Industry, CA 91745
     City
     Heather MacLeod, Environmental Specialist
     Contact Name
     (626) 968-0360
     Phone #
     Ext. (626) 968-0379
     Fax #
     E-Mail: Heather.Macleod@nrg.com

Section D - Application Type

6. The Facility Is:
   - [ ] Not In RECLAIM or Title V
   - [ ] In RECLAIM
   - [ ] In Title V
   - [ ] In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):
   - [ ] New Equipment or Process Application:
     - [ ] New Construction ( Permit to Construct)
     - [ ] Equipment On-Site but Not Constructed or Operational
     - [ ] Equipment Operating Without a Permit *
     - [ ] Compliance Plan
     - [ ] Registration/Certification
     - [ ] Streamlined Standard Permit
   - [ ] Facility Permits:
     - [ ] Title V Application or Amendment (Refer to Title V Matrix)
     - [ ] RECLAIM Facility Permit Amendment

8. Estimated Start Date of Construction (mm/dd/yyyy):
   8b. Estimated End Date of Construction (mm/dd/yyyy):
   8c. Estimated Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   - [ ] Selective Catalytic Reduction for GT 3, Device C16

10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process)
   - [ ] 4

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 OR a not-for-profit training center)
    - [ ] No
    - [ ] Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? If Yes, provide NOV/NC #.
    - [ ] No
    - [ ] Yes

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? (electric generation)

14. What is your business primary NAICS Code? (North American Industrial Classification System)
   - [ ] 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? (same parent company)
    - [ ] No
    - [ ] Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line? (subject to air quality impact review)
    - [ ] No
    - [ ] Yes

Section F - Authorization/Signature

17. Signature of Responsible Official:
   - Rick McPherson

18. Title of Responsible Official:
   - Plant Manager

19. I wish to renew the permit prior to issuance. (This may cause a delay in the application process.)
   - [ ] No
   - [ ] Yes

20. Print Name:
    - Rick McPherson

21. Date:
    - 1/1/16

22. Do you claim confidentiality of data? (If Yes, see instructions.)
    - [ ] No
    - [ ] Yes

23. Check List:
   - [ ] Authorized Signature Date
   - [ ] Form 400-CEQA
   - [ ] Supplemental Form(s) (i.e., Form 400-E-xx)
   - [ ] Fees Enclosed

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South Coast Air Quality Management District
Form 400-A
Application Form for Permit or Plan Approval
List only one piece of equipment or process per form.

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit):
Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
146536

Section B - Equipment Location Address
4. Equipment Location Is:
(C) Fixed Location  (O) Various Location
(For equipment operated at various locations, provide address of Initial site.)
911 Bixby Dr
Street Address
City of Industry, CA 91745
City
Zip

Section C - Application Mailing Address
5. Permit and Correspondence Information:
(C) Check here if same as equipment location address
911 Bixby Dr
Address
City of Industry, CA 91745
City
State
Zip
City
County
State
Zip
(E) Environmental Specialist
Contact Name
Heather MacLeod
Title
Environmental Specialist
Contact Name
Heather MacLeod
Title
Environmental Specialist

Section D - Application Type
6. The Facility is:
(C) Not In RECLAIM or Title V  (O) In RECLAIM  (O) In Title V  (O) In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only one):
7a. New Equipment or Process Application:
(C) New Construction ( Permit to Construct)  (O) Equipment On-Site But Not Constructed or Operational
(O) Equipment Operating Without A Permit *
(0) Compliance Plan  (C) Administrative Change
(0) Alteration/Modification  (O) Alteration/Modification without Prior Approval *
(0) Change of Condition  (C) Change of Condition without Prior Approval *
(0) Change of Location  (O) Change of Location without Prior Approval *
(0) Equipment Operating with an Expired/Inactive Permit *

7b. Permit Type:
(C) Title V Application or Amendment (Refer to Title V Matrix)  (C) RECLAIM Facility Permit Amendment

7c. Equipment or Process with an Existing/Previous Application or Permit:
Existing or Previous Permit/Application
If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number.

Existing or Previous Permit/Application
538816

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
Selective Catalytic Reduction for GT 4, Device C22

10. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment process)
4

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
O No  O Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? If Yes, provide NOV/NC:
O No  O Yes

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location?
electric generation
14. What is your business primary NAICS Code? (North American Industrial Classification System)
221112

15. Are there other facilities in the AQMD jurisdiction operated by the same operator?  O No  O Yes
16. Are there any schools (K-12) within 1000 feet of the facility property line?  O No  O Yes

Section F - Authorization/Signature
I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official:

18. Title of Responsible Official:
Plant Manager

19. I wish to review the permit prior to issuance.
(O) No  (O) Yes
(If may cause a delay in the application process.)

20. Print Name:
Rick McPherson

21. Date:
1/14/16

22. Do you claim confidentiality of data? (If Yes, see instructions.)
O No  O Yes

23. Check List:
(C) Authorized Signature/Date  (O) Form 400-CQA  (O) Supplemental Form(s) (i.e., Form 400-E-x)  (O) Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
South Coast Air Quality Management District

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
   146536

3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address

4. Equipment Location Is: ( ) Fixed Location ( ) Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City of Industry, CA 91745
   City Zip
   Heather MacLeod
   Contact Name
   (626) 968-0360 (626) 968-0379
   Phone # Ext.
   Environmental Specialist
   Title
   E-Mail: Heather.Macleod@nrg.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:
   ( ) Check here if same as equipment location address
   911 Bixby Dr
   Address
   City of Industry, CA 91745
   City State Zip
   Heather MacLeod
   Contact Name
   (626) 968-0360 (626) 968-0379
   Phone # Ext.
   Environmental Specialist
   Title
   E-Mail: Heather.Macleod@nrg.com

Section D - Application Type

6. The Facility Is:
   ( ) Not in RECLAIM or Title V
   ( ) In RECLAIM
   ( ) In Title V
   ( ) In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):
   ( ) New Equipment or Process Application:
   ( ) Equipment Operating With a Permit
   ( ) Compliance Plan
   ( ) Registration/Certification
   ( ) Streamlined Standard Permit
   ( ) Title V Application or Amendment (Refer to Title V Matrix)
   ( ) RECLAIM Facility Permit Amendment

7a. New Equipment or Process Application:
   ( ) Administrative Change
   ( ) Alteration/Modification
   ( ) Change of Condition
   ( ) Change of Location
   ( ) Change of Approval
   ( ) Equipment Operating with an Expiring Permit
   ( ) Equipment Operating with an Inactive Permit
   ( ) Equipment Operating with an Existing Permit

7b. Facility Permits:
   ( ) Title V Application or Amendment (Refer to Title V Matrix)
   ( ) RECLAIM Facility Permit Amendment

7c. Equipment or Process with an Existing/Previous Application or Permit:
   ( ) Administrative Change
   ( ) Alteration/Modification
   ( ) Alteration/Modification without Prior Approval
   ( ) Change of Condition
   ( ) Change of Location
   ( ) Change of Approval
   ( ) Equipment Operating with an Expired/Inactive Permit
   ( ) Equipment Operating with an Existing Permit

7d. Existing or Previous Permit/Application
   If you checked any of the items in 7c., you MUST provide an existing permit or application number:
   538825

8a. Estimated Start Date of Construction (mm/dd/yyyy):

8b. Estimated End Date of Construction (mm/dd/yyyy):

8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   Selective Catalytic Reduction for GT 5, Device C28

10. For identical equipment, how many additional applications are being submitted with this application?
    (Form 400-A required for each equipment / process)
    4

11. Are you a Small Business as per AQMD's Rule 102 definition?
    (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
    ( ) No ( ) Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment?
    If Yes, provide NOV/NC:
    ( ) No ( ) Yes

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location?
    electric generation

14. What is your business primary NACS Code?
    (North American Industrial Classification System)
    221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?
    ( ) No ( ) Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line?
    ( ) No ( ) Yes

Section F - Authorization/Signature

17. Signature of Responsible Official:
    ________________
    Rick McPherson

18. Title of Responsible Official:
    Plant Manager

19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.)
    ( ) No ( ) Yes

20. Print Name:
    ________________
    Rick McPherson

21. Date:
    1/14/16

22. Do you claim confidentiality of data? (If Yes, see instructions.)
    ( ) No ( ) Yes

23. Check List:
    ( ) Authorized Signature/Date
    ( ) Form 400-CEQA
    ( ) Supplemental Form(s) (i.e., Form 400-E-xx)
    ( ) Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
South Coast Air Quality Management District

Form 400-A
Application Form for Permit or Plan Approval
List only one piece of equipment or process per form.

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit):
Walnut Creek Energy, LLC

3. Owner’s Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address

4. Equipment Location Is: ☐ Fixed Location ☐ Various Location
(For equipment operated at various locations, provide address of initial site.)

911 Bixby Dr
Street Address
City of Industry, CA 91745
City
Heather MacLeod
Contact Name
Environmental Specialist
Title
(626) 968-0360 ☐ Ext. (626) 968-0379 ☐ Ext.
Phone # ☐ Fax #
E-Mail: Heather.Macleod@nrg.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:
☒ Check here if same as equipment location address

911 Bixby Dr
Address
City of Industry, CA 91745
City
Heather MacLeod
Contact Name
Environmental Specialist
Title
(626) 968-0360 ☐ Ext. (626) 968-0379 ☐ Ext.
Phone # ☐ Fax #
E-Mail: Heather.Macleod@nrg.com

Section D - Application Type

6. The Facility Is: ☐ Not In RECLAIM or Title V ☐ In RECLAIM ☐ In Title V ☐ In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):
☐ New Construction (Permit to Construct)
☐ Equipment On-Site But Not Constructed or Operational
☐ Equipment Operating Without a Permit *
☐ Compliance Plan
☐ Registration/Certification
☐ Streamlined Standard Permit

7a. New Equipment or Process Application:

7b. Facility Permits:
☐ Title V Application or Amendment (Refer to Title V Matrix)
☐ RECLAIM Facility Permit Amendment

7c. Equipment or Process with an Existing/Previous Application or Permit:
☐ Administrative Change
☐ Alteration/Modification
☐ Alteration/Modification without Prior Approval *
☐ Change of Condition
☐ Change of Location
☐ Change of Condition without Prior Approval *
☐ Equipment Operating with an Expired Permit *
☐ Equipment Operating with an Expired Permit *

* A Higher Permit Processing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(G)(ii)).

Section E - Facility Business Information

8a. Estimated Start Date of Construction (mm/dd/yyyy):

8b. Estimated End Date of Construction (mm/dd/yyyy):

8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
Gas turbine 1, Device 01

10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process)

11. Are you a Small Business as per AQMD’s Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
☒ No ☐ Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? If Yes, provide NOV/NC #: ☐ No ☑ Yes

Section F - Authorization/Signature

13. What type of business is being conducted at this equipment location? ☐ electric generation

14. What is your business primary NAICS Code? (North American Industrial Classification System)
221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ☑ No ☐ Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line? ☑ No ☐ Yes

17. Signature of Responsible Official:

18. Title of Responsible Official:
Plant Manager

19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.) ☑ No ☐ Yes

20. Print Name:
Rick McPherson

21. Date: 1/14/16

22. Do you claim confidentiality of data? (If Yes, see instructions.) ☑ No ☐ Yes

23. Check List: ☒ Authorized Signature/Date ☒ Form 400-CEQA ☐ Supplemental Form(s) (ie., Form 400-E(xx)) ☒ Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
**Section A - Operator Information**

1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
   146536

3. Owner's Business Name (If different from Business Name of Operator):

**Section B - Equipment Location Address**

4. Equipment Location Is: ( ) Fixed Location ( ) Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City of Industry, CA 91745
   Phone # (626) 968-0360
   E-Mail Heather.Macleod@nr1.com

**Section C - Permit Mailing Address**

5. Permit and Correspondence Information:
   ( ) Check here if same as equipment location address
   911 Bixby Dr
   Address
   City of Industry, CA 91745
   Phone # (626) 968-0379
   E-Mail Heather.Macleod@nr1.com

**Section D - Application Type**

6. The Facility Is: ( ) Not In RECLAIM or Title V ( ) In RECLAIM
   ( ) In Title V ( ) In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

**Section E - Facility Business Information**

8. Estimated Start Date of Construction (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   Gas turbine 2, Device D7

10. For Identical equipment, how many additional applications are being submitted with this application?
    (Form 400-A required for each equipment / process)
    4

11. Are you a Small Business as per AQMD's Rule 102 definition?
    (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
    ( ) No ( ) Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment?
    (If Yes, provide NOVIC#):
    ( ) No ( ) Yes

13. What type of business is being conducted at this equipment location?
    Electric generation

14. What is your business primary NAICS Code?
    (North American Industrial Classification System)
    221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?
    ( ) No ( ) Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line?
    ( ) No ( ) Yes

17. Signature of Responsible Official:
    ( ) Rick McPherson

18. Title of Responsible Official:
    Plant Manager

19. I wish to renew the permit prior to issuance.
    (May cause a delay in the application process.)
    ( ) No ( ) Yes

20. Print Name:
    Rick McPherson

   21. Date:
    11/14/16

22. Do you claim confidentiality of data? (If Yes, see instructions.)
    ( ) No ( ) Yes

23. Check List:
   ( ) Authorized Signature/Date
   ( ) Form 400-CEQA
   □ Supplemental Form(s) (ie., Form 400-E-xx)
   ( ) Fees Enclosed
Form 400-A
Application Form for Permit or Plan Approval

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC

3. Owner’s Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address
4. Equipment Location Is: (o) Fixed Location (□) Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City, Industry , CA 91745
   Zip
   City
   Heather MacLeod
   Environmental Specialist
   Contact Name
   Title
   (626) 968-0360 (626) 968-0379
   Phone # Ext.
   Fax #
   E-Mail: Heather.Macleod@nrg.com

Section C - Permit Mailing Address
5. Permit and Correspondence Information:
   (x) Check here if same as equipment/location address
   911 Bixby Dr
   Address
   City, Industry , CA 91745
   State Zip
   City
   Heather MacLeod
   Environmental Specialist
   Contact Name
   Title
   (626) 968-0360 (626) 968-0379
   Phone # Ext.
   Fax #
   E-Mail: Heather.Macleod@nrg.com

Section D - Application Type
6. The Facility Is: (□) Not In RECLAIM or Title V (□) In RECLAIM (□) In Title V (□) In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

   □ New Construction (Permit to Construct)
   □ Equipment On-Site But Not Constructed or Operational
   □ Equipment Operating Without A Permit *
   □ Compliance Plan
   □ Registration/Certification
   □ Streamlined Standard Permit

7b. Facility Permits:
   (□) Title V Application or Amendment (Refer to Title V Matrix)
   (□) RECLAIM Facility Permit Amendment
   (*) A Higher Permit Processing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(j)).

8a. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   Gas turbine 3, Device D13

8b. Estimated End Date of Construction (mm/dd/yyyy):

8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Date of Issuance:

10. For Identical equipment, how many additional applications are being submitted with this application?
    (Form 400-A required for each equipment/process)
    4

11. Are you a Small Business as per AQMD's Rule 102 definition?
    (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
    (□) No (□) Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment?
    (□) No (□) Yes

   If Yes, provide NOV/NC:

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location?

   Electric generation

14. What is your business primary NAICS Code?
    (North American Industrial Classification System)
    221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?
    (□) No (□) Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line?
    (□) No (□) Yes

Section F - Authorization/Signature
I certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official:

18. Title of Responsible Official:
   Plant Manager

19. I wish to request the permit prior to issuance.
   (This may cause a delay in the application process.)
   (□) No (□) Yes

20. Print Name:
    Rick McPherson

21. Date:
    1/14/16

22. Do you claim confidentiality of data? (If Yes, see instructions.)
    (□) No (□) Yes

23. Check List:
   (□) Authorized Signature/Date
   (□) Form 400-CEQA
   (□) Supplemental Form(s) (ie., Form 400-E-xx)
   (□) Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
   146536

Section B - Equipment Location Address

4. Equipment Location Is: ○ Fixed Location  ○ Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City of Industry  ,  CA  91745
   City
   Heather MacLeod  Environmental Specialist
   Contact Name
   (626) 968-0360  (626) 968-0379
   Phone #  Ext.
   E-Mail: Heather.Macleod@nrg.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:  ○ Check here if same as equipment location address
   911 Bixby Dr
   Address
   City of Industry  ,  CA  91745
   City
   Heather MacLeod  Environmental Specialist
   Contact Name
   (626) 968-0360  (626) 968-0379
   Phone #  Ext.
   E-Mail: Heather.Macleod@nrg.com

Section D - Application Type

6. The Facility Is: ○ Not In RECLAIM or Title V  ○ In RECLAIM
   ○ In Title V  ○ In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only one):
   ○ New Construction (Permit to Construct)
   ○ Equipment On-Site But Not Constructed or Operational
   ○ Equipment Operating Without A Permit *
   ○ Compliance Plan
   ○ Registration/Certification
   ○ Streamlined Standard Permit
   ○ Title V Application or Amendment (Refer to Title V Matrix)
   ○ RECLAIM Facility Permit Amendment

7a. New Equipment or Process Application:
   ○ Administrative Change
   ○ Alteration/Modification
   ○ Alteration/Modification without Prior Approval *
   ○ Change of Condition
   ○ Change of Condition without Prior Approval *
   ○ Change of Location
   ○ Change of Location without Prior Approval *
   ○ Equipment Operating with an Expired/Inactive Permit *
   ○ Equipment Operating with an Existing Permit Agreement

7c. Equipment or Process with an Existing/Previous Application or Permit:
   Existing or Previous Permit/Application
   If you checked any of the items in 7c, you MUST provide an existing
   Permit or Application Number:
   538807

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   Gas turbine 4, Device D19

10. For Identical equipment, how many additional applications are being submitted with this application?
   (Form 400-A required for each equipment / process)
   4

11. Are you a Small Business as per AQMD's Rule 102 definition?
   (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
   ○ No  ○ Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment?
   If Yes, provide NOV/NC#:
   ○ No  ○ Yes

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location?
   Electric Generation

14. What is your business primary NAICS Code?
   (North American Industrial Classification System)
   221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?
   ○ No  ○ Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line?
   ○ No  ○ Yes

Section F - Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official:
   Rick McPherson
   Title: Plant Manager
   20. Print Name:
   21. Date: 1/14/16
   22. Do you claim confidentiality of data? (If Yes, see instructions.)
   ○ No  ○ Yes

23. Check List:
   ○ Authorized Signature/Date
   ○ Form 400-C/EQA
   ○ Supplemental Form(s) (ie., Form 400-E-xx)
   ○ Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
Application Form for Permit or Plan Approval

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit):
   Walnut Creek Energy, LLC

3. Owner's Business Name (If different from Facility Name of Operator):

Section B - Equipment Location Address

4. Equipment Location Is:  ☐ Fixed Location  ☐ Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City of Industry, CA 91745

Contact Name: Heather MacLeod
Contact Title: Environmental Specialist
Contact Phone #: (626) 968-0360
Email: Heather.Macleod@nrg.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:
   ☑ Check here if same as equipment location address
   911 Bixby Dr
   Address
   City of Industry, CA 91745
   City
   Zip

Contact Name: Heather MacLeod
Contact Title: Environmental Specialist
Contact Phone #: (626) 968-0360
Email: Heather.Macleod@nrg.com

Section D - Application Type

6. The Facility Is:  ☐ Not In RECLAIM or Title V  ☑ In RECLAIM  ☐ In Title V  ☑ In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application:
   ☐ New Construction (Permit to Construct)
   ☐ Equipment On-Site But Not Constructed or Operational
   ☐ Equipment Operating Without A Permit*
   ☐ Compliance Plan
   ☐ Registration/Certification
   ☐ Streamlined Standard Permit

7b. Facility Permits:
   ☐ Title V Application or Amendment (Refer to Title V Matrix)
   ☐ RECLAIM Facility Permit Amendment

7c. Equipment or Process with an Existing/Previous Application or Permit:
   ☐ Administrative Change
   ☐ Alteration/Modification
   ☐ Alteration/Modification without Prior Approval*
   ☐ Change of Condition
   ☐ Change of Location
   ☐ Change of Location without Prior Approval*
   ☐ Equipment Operating with an Expired/Inactive Permit*
   ☐ A Higher Permit Processing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(ii)).

8a. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   Gas turbine 5, Device D25

8b. Estimated End Date of Construction (mm/dd/yyyy):

8c. Estimated Start Date of Construction (mm/dd/yyyy):

9. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment/process)
   4

10. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? (Form 400-A required for each equipment/process)
   ☐ No  ☑ Yes

Section E - Facility Business Information

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center)
   ☐ No  ☑ Yes

12. Are there any schools (K-12) within 1000 feet of the facility property line? (Form 400-A required for each equipment/process)
   ☐ No  ☑ Yes

Section F - Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application are true and correct.

Signature of Responsible Official:

Title of Responsible Official:

Print Name: Rick McPherson

Date: 1/14/16

20. Check List:
   ☑ Authorized Signature/Date  ☑ Form 400-CEQA  ☐ Supplemental Form(s) (ie., Form 400-E-xx)  ☑ Fees Enclosed

AQMD USE ONLY

APPLICATION TRACKING #
CHECK #
AMOUNT RECEIVED
PAYMENT TRACKING #
VALIDATION

<table>
<thead>
<tr>
<th>DATE</th>
<th>APP</th>
<th>REJ</th>
<th>DATE</th>
<th>APP</th>
<th>REJ</th>
<th>CLASS</th>
<th>BASIC CONTROL</th>
<th>EQUIPMENT CATEGORY CODE</th>
<th>TEAM</th>
<th>ENGINEER</th>
<th>REASONEVENTION TAKEN</th>
</tr>
</thead>
</table>

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South Coast Air Quality Management District

Form 400-A
Application Form for Permit or Plan Approval
List only one piece of equipment or process per form.

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit):
Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
146536

Section B - Equipment Location Address
4. Equipment Location Is:
   ☐ Fixed Location  ☐ Various Location
   (For equipment operated at various locations, provide address of initial site.)
   911 Bixby Dr
   Street Address
   City of Industry, CA 91745
   City
   Heather MacLeod
   Environmental Specialist
   Contact Name
   (626) 968-0360  (626) 968-0379
   Phone #  Ext.  Fax #
   E-Mail: Heather.MacLeod@ngc.com

Section C - Permit Mailing Address
5. Permit and Correspondence Information:
   ☑ Check here if same as equipment location address
   911 Bixby Dr
   Address
   City of Industry, CA 91745
   City
   Heather MacLeod
   Environmental Specialist
   Contact Name
   (626) 968-0360  (626) 968-0379
   Phone #  Ext.  Fax #
   E-Mail: Heather.MacLeod@ngc.com

Section D - Application Type
6. The Facility Is:
   ☐ Not In RECLAIM or Title V  ☐ In RECLAIM  ☐ In Title V  ☐ In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):
   ☐ New Construction (Permit to Construct)
   ☐ Equipment On-Site But Not Constructed or Operational
   ☐ Equipment Operating Without A Permit *
   ☐ Compliance Plan
   ☐ Registration/Certification
   ☐ Streamlined Standard Permit
   ☐ Title V Application or Amendment (Refer to Title V Matrix)
   ☐ RECLAIM Facility Permit Amendment

7a. New Equipment or Process Application:
7b. Facility Permits:
   ☐ Title V Application or Amendment (Refer to Title V Matrix)
   ☐ RECLAIM Facility Permit Amendment

7c. Equipment or Process with an Existing/Previous Application or Permit:
   ☐ Administrative Change
   ☐ Alteration/Modification
   ☐ Alteration/Modification without Prior Approval *
   ☐ Change of Condition
   ☐ Change of Location
   ☐ Change of Location without Prior Approval *
   ☐ Equipment Operating with an Expired/Inactive Permit *
   ☐ Equipment Operating with an Expired/Inactive Permit *

8. Estimated Start Date of Construction (mm/dd/yyyy): 8b. Estimated End Date of Construction (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
   Emergency fire pump engine, Device 34

10. For Identical equipment, how many additional applications are being submitted with this application?
   (Form 400-A required for each equipment / process)

11. Are you a Small Business as per AQMD’s Rule 102 definition?
    (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center) ☐ No  ☑ Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment?

13. What type of business is being conducted at this equipment location?
   electric generation

14. What is your business primary NAICS Code?
    (North American Industrial Classification System)
    221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ☐ No  ☑ Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line? ☐ No  ☑ Yes

Section E - Facility Business Information

Section F - Authorization/Signature
I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official:
   Rick McPherson
   Print Name:
   1/14/16
   Date:

18. Title of Responsible Official:
    Plant Manager

19. I wish to review the permit prior to issuance.
    (This may cause a delay in the application process.) ☐ No  ☑ Yes

20. Check List:
    ☑ Authorized Signature/Date  ☑ Form 400-CEQA  ☑ Supplemental Form(s) (ie., Form 400-E-xx)  ☑ Fees Enclosed

© South Coast Air Quality Management District, Form 400-A (2014.07)
The SCAQMD is required by state law, the California Environmental Quality Act (CEQA), to review discretionary permit project applications for potential air quality and other environmental impacts. This form is a screening tool to assist the SCAQMD in clarifying whether or not the project has the potential to generate significant adverse environmental impacts that might require preparation of a CEQA document [CEQA Guidelines §15060(a)]. Refer to the attached instructions for guidance in completing this form. For each Form 400-A application, also complete and submit one Form 400-CEQA. If submitting multiple Form 400-A applications for the same project at the same time, only one 400-CEQA form is necessary for the entire project. If you need assistance completing this form, contact Permit Services at (909) 396-3385 or (909) 396-2668.

### Section A - Facility Information

1. **Facility Name (Business Name of Operator To Appear On The Permit):**
   - Walnut Creek Energy, LLC

2. **Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):**
   - 146536

3. **Project Description:**
   - Title V minor changes of conditions with no engineering evaluation

### Section B - Review For Exemption From Further CEQA Action

Check "Yes" or "No" as applicable

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Is this application for:</th>
</tr>
</thead>
<tbody>
<tr>
<td>🌟</td>
<td>〇</td>
<td>A CEQA and/or NEPA document previously or currently prepared that specifically evaluates this project? If yes, attach a copy of the signed Notice of Determination to this form.</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>A request for a change of permittee only (without equipment modifications)?</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>A functionally identical permit unit replacement with no increase in rating or emissions?</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>A change of daily VOC permit limit to a monthly VOC permit limit?</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>Equipment damaged as a result of a disaster during state of emergency?</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>A Title V (i.e., Regulation XXX) permit renewal (without equipment modifications)?</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>A Title V administrative permit revision?</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>The conversion of an existing permit into an initial Title V permit?</td>
</tr>
</tbody>
</table>

If "Yes" is checked for any question in Section B, your application does not require additional evaluation for CEQA applicability. Skip to Section D - Signatures on page 2 and sign and date this form.

### Section C - Review of Impacts Which May Trigger CEQA

Complete Parts I-VI by checking "Yes" or "No" as applicable. To avoid delays in processing your application(s), explain all "Yes" responses on a separate sheet and attach it to this form.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Part I - General</th>
</tr>
</thead>
<tbody>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>Has this project generated any known public controversy regarding potential adverse impacts that may be generated by the project? Controversy may be construed as concerns raised by local groups at public meetings; adverse media attention such as negative articles in newspapers or other periodical publications, local news programs, environmental justice issues, etc.</td>
</tr>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>Is this project part of a larger project? If yes, attach a separate sheet to briefly describe the larger project.</td>
</tr>
</tbody>
</table>

Part II - Air Quality

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Will there be any demolition, excavating, and/or grading construction activities that encompass an area exceeding 20,000 square feet?</th>
</tr>
</thead>
<tbody>
<tr>
<td>🌟</td>
<td>🌟</td>
<td>Does this project include the open outdoor storage of dry bulk solid materials that could generate dust? If Yes, include a plot plan with the application package.</td>
</tr>
</tbody>
</table>

---

1 A "project" means the whole of an action which has a potential for resulting in physical change to the environment, including construction activities, clearing or grading of land, improvements to existing structures, and activities or equipment involving the issuance of a permit. For example, a project might include installation of a new, or modification of an existing internal combustion engine, dry-cleaning facility, boiler, gas turbine, spray coating booth, solvent cleaning tank, etc.

2 To download the CEQA guidelines, visit http://ceres.ca.gov/env_law/state.html.

3 To download this form and the instructions, visit http://www.aqmd.gov/ceqa or http://www.aqmd.gov/permit
### Section C - Review of Impacts Which May Trigger CEQA (cont.)

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Part II - Air Quality (cont.)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Would this project result in noticeable off-site odors from activities that may not be subject to SCAQMD permit requirements? For example, compost materials or other types of greenwaste (i.e., lawn clippings, tree trimmings, etc.) have the potential to generate odor complaints subject to Rule 402 – Nuisance.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Does this project cause an increase of emissions from marine vessels, trains and/or airplanes?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Will the proposed project increase the QUANTITY of hazardous materials stored aboveground onsite or transported by mobile vehicle to or from the site by greater than or equal to the amounts associated with each compound on the attached Table 1?</td>
</tr>
</tbody>
</table>

#### Part III - Water Resources

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Will the project increase demand for water at the facility by more than 5,000,000 gallons per day?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>The following examples identify some, but not all, types of projects that may result in a “yes” answer to this question: 1) projects that generate steam; 2) projects that use water as part of the air pollution control equipment; 3) projects that require water as part of the production process; 4) projects that require new or expansion of existing sewage treatment facilities; 5) projects where water demand exceeds the capacity of the local water purveyor to supply sufficient water for the project; and 6) projects that require new or expansion of existing water supply facilities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Will the project require construction of new water conveyance infrastructure?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Examples of such projects are when water demands exceed the capacity of the local water purveyor to supply sufficient water for the project, or require new or modified sewage treatment facilities such that the project requires new water lines, sewage lines, sewage hook-ups, etc.</td>
</tr>
</tbody>
</table>

#### Part IV - Transportation/Circulation

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Will the project result in (Check all that apply):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>a. the need for more than 350 new employees?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>b. an increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round-trips per day?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>c. increase customer traffic by more than 700 visits per day?</td>
</tr>
</tbody>
</table>

#### Part V - Noise

| Yes | No | Will the project include equipment that will generate noise GREATER THAN 90 decibels (dB) at the property line? |

#### Part VI - Public Services

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Will the project create a permanent need for new or additional public services in any of the following areas (Check all that apply):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>a. Solid waste disposal? Check “No” if the projected potential amount of wastes generated by the project is less than five tons per day.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>b. Hazardous waste disposal? Check “No” if the projected potential amount of hazardous wastes generated by the project is less than 42 cubic yards per day (or equivalent in pounds).</td>
</tr>
</tbody>
</table>

**REMEMBER: For each “Yes” response in Section C, attach all pertinent information including but not limited to estimated quantities, volumes, weights, etc.**

### Section D - Signatures

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT THIS FORM IS A SCREENING TOOL AND THAT THE SCAQMD RESERVES THE RIGHT TO CONSIDER OTHER PERTINENT INFORMATION IN DETERMINING CEQA APPLICABILITY.

1. **Signature of Responsible Official of Firm:**
   
   [Signature]

2. **Title of Responsible Official of Firm:**
   
   Plant Manager

3. **Print Name of Responsible Official of Firm:**
   
   Rick McPherson

4. **Date Signed:**
   
   1/14/16

5. **Phone # of Responsible Official of Firm:**
   
   (626) 968-0360

6. **Fax # of Responsible Official of Firm:**
   
   (626) 968-0379

7. **Email of Responsible Official of Firm:**
   
   Rick.McPherson@nrg.com

8. **Signature of Preparer, (if prepared by person other than responsible official of firm):**
   
   [Signature]

9. **Title of Preparer:**
   
   Environmental Specialist

10. **Print Name of Preparer:**
    
    Heather MacLeod

11. **Date Signed:**
    
    1/14/16

12. **Phone # of Preparer:**
    
    (626) 968-0360

13. **Fax # of Preparer:**
    
    (626) 968-0379

14. **Email of Preparer:**
    
    Heather.MacLeod@nrg.com

**THIS CONCLUDES FORM 400-CEQA. INCLUDE THIS FORM AND ANY ATTACHMENTS WITH FORM 400-A.**

---

*Table 1 – Regulated Substances List and Threshold Quantities for Accidental Release Prevention can be found in the Instructions for Form 400-CEQA.*

© South Coast Air Quality Management District, Form 400-CEQA (2014.07)
ATTACHMENT

California Energy Commission (CEC) Adoption Order for
Walnut Creek Energy Park (05-AFC-2)
WALNUT CREEK ENERGY PARK
Application For Certification (05-AFC-2)
Los Angeles County

FEBRUARY 2008
(05-AFC-2)
CEC-800-2008-002-CMF
WALNUT CREEK
ENERGY PARK

Application For Certification (05-4FC-2)
Los Angeles County

CALIFORNIA ENERGY COMMISSION

1516 9th Street
Sacramento, CA 95814
www.energy.ca.gov/sitingcases/walnutcreek/index.html

JACKALYNE PFANNENSTIEL
Chair, Presiding Member

COMMISSIONERS-
JAMES D. BOYD
Vice Chair

ARTHUR H. ROSENFELD, Ph. D.
Commissioner

JEFFREY D. BYRON
Commissioner

KAREN DOUGLAS
Commissioner

GARRET SHEAN
Hearing Officer

RAOUL RENAUD
Hearing Officer
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
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<tbody>
<tr>
<td>EXECUTIVE SUMMARY</td>
<td>3</td>
</tr>
<tr>
<td>PROJECT DESCRIPTION</td>
<td>5</td>
</tr>
<tr>
<td>ENVIRONMENTAL QUALITY</td>
<td></td>
</tr>
<tr>
<td>Air Quality</td>
<td>11</td>
</tr>
<tr>
<td>Biology</td>
<td>55</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>65</td>
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<td>Geology &amp; Paleontology</td>
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<td>Hazardous Materials</td>
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<tr>
<td>Land Use</td>
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<td>Noise</td>
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<td>Public Health</td>
<td>133</td>
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<td>Socioeconomics</td>
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<td>Traffic &amp; Transportation</td>
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<tr>
<td>Visual Resources</td>
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<tr>
<td>Waste Management</td>
<td>187</td>
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<td>Water Quality &amp; Soils</td>
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<td>Water Resources</td>
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<td>Alternatives</td>
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<td>Efficiency</td>
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<td>Facility Design</td>
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<td>Reliability</td>
<td>257</td>
</tr>
<tr>
<td>Transmission Line Safety &amp; Nuisance</td>
<td>263</td>
</tr>
<tr>
<td>Transmission System Engineering</td>
<td>273</td>
</tr>
<tr>
<td>Worker Safety</td>
<td>285</td>
</tr>
<tr>
<td>COMPLIANCE</td>
<td>295</td>
</tr>
<tr>
<td>ADOPTION ORDER</td>
<td>311</td>
</tr>
</tbody>
</table>
EXECUTIVE SUMMARY:

The Energy Commission approves the proposed 500 megawatt Walnut Creek Energy Park in the City of Industry, California, together with the following highlighted measures to mitigate potential environmental and community impacts and comply with applicable laws, ordinances, regulations and standards (LORS):

**ENERGY RESOURCES:**
- The proposed project will use state-of-the-art GE LMS100 technology resulting in optimized resource efficiency.

**AIR QUALITY**
- The power plant will use state-of-the-art Best Available Control Technology to minimize emissions.
- Offsets and RECLAIM credits will be used to compensate for any pollutant for which the South Coast Air Quality Management District determines that it is in non-attainment.

**VISUAL**
- There is no significant visual impact for hillside residents of Puente Hills and Hacienda Heights, since they generally look from a distance across the valley over the project.

**NOISE**
- In the event of a noise complaint due to rare overnight operation, the Applicant will limit overnight operation to render the project barely audible at 49 dBA.

**PROJECT BENEFITS**
- Average of 220 direct project-related construction jobs.
- Total capital costs of $220-280 million.
- Construction payroll of $28.6 million.
- Operation payroll is $630,000.
- Property taxes of $3.9 to $4.5 million.
- Total sales and use tax during construction of $14.8 million.
- Local sales tax of $247,500 annually
- $6 to 9 million spent locally for construction materials.
- $3 million annual operation budget.
This Order adopts the Commission Decision on the Walnut Creek, LLC., Walnut Creek Energy Park. It incorporates the Presiding Member's Proposed Decision. The Commission Decision is based upon the evidentiary record of this proceeding and considers comments received at the Commission Business Meeting. The text of the attached Commission Decision contains a summary of the evidence and the rationale for the Findings and Conditions.

This Order adopts by reference the text, Conditions of Certification, and Compliance Verifications contained in the Commission Decision. It also adopts specific requirements contained in the Commission Decision which ensure the proposed facility will be designed, constructed, and operated in a manner to protect environmental quality, to assure public health and safety, and to operate in a safe and reliable manner.

Findings

The Commission hereby adopts the following findings in addition to those contained in the accompanying text:

1. The project will provide a degree of economic benefits and electricity reliability to the local area.

2. The Conditions of Certification contained in this Decision, if implemented by the project owner, ensure that the whole of the project will be designed, constructed, and operated in conformity with applicable local, regional, state, and federal laws, ordinances, regulations, and standards, including applicable public health and safety standards, and air and water quality standards.

3. Implementation of the Conditions of Certification contained in the accompanying text will ensure protection of environmental quality and assure reasonably safe and reliable operation of the facility. The Conditions of Certification also assure that the project will neither result in, nor contribute substantially to, any significant direct, indirect, or cumulative adverse environmental impacts.

4. Existing governmental land use restrictions are sufficient to adequately control population density in the area surrounding the facility and may be reasonably expected to ensure public health and safety.
5. Construction and operation of the project, as mitigated, will not create any adverse environmental impacts. Therefore, the evidence of record also establishes that no feasible alternatives to the project, as described during this proceeding, exist which would reduce or eliminate any significant environmental impacts of the mitigated project.

6. The evidence of record does not establish the existence of any environmentally superior alternative site.

7. The evidence of record establishes that an environmental justice screening analysis was conducted and that the project, as mitigated, will not have a disproportionate impact on low-income or minority populations.

8. The Decision contains a discussion of the public benefits of the project as required by Public Resources Code section 25523(h).

9. This Decision contains measures to ensure that the planned, temporary, or unexpected closure of the project will occur in conformance with applicable laws, ordinances, regulations, and standards.

10. The proceedings leading to this Decision have been conducted in conformity with the applicable provisions of Commission regulations governing the consideration of an Application for Certification and thereby meet the requirements of Public Resources Code, sections 21000 et seq., and 25500 et seq.

Therefore, the Commission ORDERS the following:

1. The Application for Certification of the Walnut Creek Energy Park in the City of Industry, California, as described in this Decision, is hereby approved, and a certificate to construct and operate the project is hereby granted.

2. The approval of the Application for Certification is subject to the timely performance of the Conditions of Certification and Compliance Verifications enumerated in the accompanying text. The Conditions and Compliance Verifications are integrated with this Decision and are not severable therefrom. While the project owner may delegate the performance of a Condition or Verification, the duty to ensure adequate performance of a Condition or Verification may not be delegated.

3. The decision is adopted, issued, effective and final on October 10, 2007.

4. Reconsideration of this Decision is governed by Public Resources Code, section 25530.

5. Judicial review of this Decision is governed by Public Resources Code, section 25531.

6. The Commission hereby adopts the Conditions of Certification, Compliance Verifications, and associated dispute resolution procedures as part of this Decision in
order to implement the compliance monitoring program required by Public Resources Code section 25532. All Conditions in this Decision take effect immediately upon adoption and apply to all construction and site preparation activities including, but not limited to, ground disturbance, site preparation, and permanent structure construction.

7. The Executive Director of the Commission or delegatee shall transmit a copy of this Decision and appropriate accompanying documents as provided by Public Resources Code section 25537 and California Code of Regulations, title 20, section 1768.

Dated: February 27, 2008, at Sacramento, California.

JACKALYNE PFANNESTIEL
Chairman

- Absent -
JAMES D. BOYD
Vice Chair

ARTHUR H. ROSENFELD
Commissioner

JEFFREY D. BYRON
Commissioner

KAREN DOUGLAS
Commissioner
**Section I - Operator Information**

1. **Facility Name (Business Name of Operator That Appears On Permit):**
   Walnut Creek Energy, LLC

2. **Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):**
   146536

3. **This Certification is submitted with a (Check one):**
   - Title V Application (Initial, Revision or Renewal)
   - Supplement/Correction to a Title V Application
   - MACT Part 1

4. **Is Form 500-C2 included with this Certification?**
   - Yes [ ]
   - No [ ]

**Section II - Responsible Official Certification Statement**

*Read each statement carefully and check each that applies – You must check 3a or 3b.*

1. **For Initial, Permit Renewal, and Administrative Application Certifications:**
   - [ ] The facility, including equipment that are exempt from written permit per Rule 219, is currently operating and will continue to operate in compliance with all applicable requirement(s) identified in Section II and Section III of Form 500-C1,
     - [ ] except for those requirements that do not specifically pertain to such devices or equipment and that have been identified as "Remove" on Section III of Form 500-C1.
     - [ ] except for those devices or equipment that have been identified on the completed and attached Form 500-C2 that will not be operating in compliance with the specified applicable requirement(s).
   - [ ] The facility, including equipment that are exempt from written permit per Rule 219, will meet in a timely manner, all applicable requirements with future effective dates.

2. **For Permit Revision Application Certifications:**
   - [ ] The equipment or devices to which this permit revision applies, will in a timely manner comply with all applicable requirements identified in Section II and Section III of Form 500-C1.

3. **For MACT Hammer Certifications:**
   - [ ] The facility is subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63), also known as the MACT "hammer." The following information is submitted with a Title V application to comply with the Part 1 requirements of Section 112(j).
   - [ ] The facility is not subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63).

**Section III - Authorization/Signature**

I certify under penalty of law that I am the responsible official for this facility as defined in AQMD Regulation XXX and that based on information and belief formed after reasonable inquiry, the statement and information in this document and in all attached application forms and other materials are true, accurate, and complete.

1. **Signature of Responsible Official:**
   [Signature]

2. **Title of Responsible Official:**
   Plant Manager

3. **Print Name:**
   Rick McPherson

4. **Date:**
   1/14/16

5. **Phone #:**
   (626) 968-0360

6. **Fax #:**
   (626) 968-0379

7. **Address of Responsible Official:**
   911 Bixby Dr

   **City of Industry**
   **CA** 91745-1702

**Acid Rain Facilities Only: Please Complete Section IV**

© South Coast Air Quality Management District, Form 500-A2 (2014.07)
Acid Rain facilities must certify their compliance status of the devices subject to applicable requirements under Title IV by an individual who meets the definition of Designated (or Alternate) Representative in 40 CFR Part 72.

<table>
<thead>
<tr>
<th>Section IV - Designated Representative Certification Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>For Acid Rain Facilities Only:</strong> I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1. Signature of Designated Representative or Alternate:</th>
<th>2. Title of Designated Representative or Alternate:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rick McPherson</td>
<td>Plant Manager</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Print Name of Designated Representative or Alternate:</th>
<th>4. Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rick McPherson</td>
<td>1/14/16</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. Phone #:</th>
<th>6. Fax #:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(626) 968-0360</td>
<td>(626) 968-0379</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7. Address of Designated Representative or Alternate:</th>
</tr>
</thead>
<tbody>
<tr>
<td>911 Bixby Dr</td>
</tr>
<tr>
<td>-------------------------------------------------------</td>
</tr>
<tr>
<td>Street #</td>
</tr>
</tbody>
</table>
Form 500-F1 (Title V)
Title IV - Acid Rain Phase II Facility Information Summary

This form shall be completed by Acid Rain facilities ONLY and shall accompany all requests for Phase II permit actions unique to Acid Rain facilities. Also attach a completed Form 500-A2. In addition, if an initial Title V permit, permit renewal, or permit revision is requested, attach Form 500-A1 and any supplemental Acid Rain forms (Forms 500-F2, 500-F3, and 500-F4), as appropriate.

Section I - General Information

1. Facility Name (Business Name of Operator That Appears On Permit):
   Walnut Creek Energy, LLC

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD):
   146536

3. ORIS Code (5-Digit):
   57515

4. This is an application for a (Check all that apply to the facility):
   a. ☐ Phase II Acid Rain Permit or Revision (Complete Section II of this form)
   b. ☐ Repowering Extension Plan or Revision (Complete Form 500-F2)
   c. ☐ New Unit Exemption or Revision (Complete Form 500-F3)
   d. ☐ Retired Unit Exemption or Revision (Complete Form 500-F4)

5. The requested permit action involves a(n) (Check one):
   a. ☐ Administrative Permit Revision
   b. ☐ Significant Permit Revision
   c. ☐ Fast Track Permit Revision
   d. ☐ Automatic Permit Revision
   e. ☐ Other (specify): Minor Title V Change

6. For all applications requesting a permit revision, provide a general description of the proposed changes (Attach additional sheets as necessary):
   - Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump
   - Clarification that the inlet temperature requirements for the SCR do not apply during startup and shutdown periods
   - Clarification/addition of applicable conditions from 40 CFR 60, Subpart III for the emergency fire pump engine

Section II - Phase II Acid Rain Device Summary

1. The following information is (Check one): a. ☐ New  b. ☐ Revised

<table>
<thead>
<tr>
<th>AQMD Device #</th>
<th>EPA Unit #</th>
<th>Will device need a Repowering Extension Plan?</th>
<th>Has device started operations on or after 11/15/90?</th>
<th>Device Operations Start Date (mo/day/yr)</th>
<th>For devices starting-up after 11/15/90, provide date when Monitoring Certification will begin (mo/day/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>☐ Yes ☐ No</td>
<td>☐ Yes ☐ No</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
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<td>☐ Yes ☐ No</td>
<td>☐ Yes ☐ No</td>
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<td></td>
<td>☐ Yes ☐ No</td>
<td>☐ Yes ☐ No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

© South Coast Air Quality Management District, Form 500-F1 (2014.07)
To complete this application, type or print the information in the appropriate blanks.

Section I - General Information
1. Facility Name: Provide the name of the legal entity that operates the facility.
   AQMD Facility ID: Complete only if the facility has been issued a 6-digit identification or ID number by AQMD. If not, leave these boxes blank. An ID number will be assigned when the application is submitted.
   ORIS Code: Provide the 5-digit code that has been assigned to facility by Department of Energy.

2. Check all applicable boxes to indicate the type of Acid Rain application filed. If box 1a. is checked, complete Section II of this form. If box 1b. is checked, complete and attach Form 500-F2 - Title IV Phase II Acid Rain Repowering Extension Plan. If box 1c. is checked, complete and attach Form 500-F3 - Title IV Phase II Acid Rain New Unit Exemption Request. If box 1d. is checked, complete and attach Form 500-F4 - Title IV Phase II Acid Rain Retired Unit Exemption Request.

3. Check one box that best represents the type of permit action requested. If box 1e. is checked, in the space provided identify any additional elements regarding the application or the facility that need to be considered during the processing of this application (i.e., Initial Title V Permit Application).

4. If the application is a revision request, describe in general terms the changes that are proposed in the application revision request. Attach additional sheets as necessary.

Section II - Phase II Acid Rain Device Summary
1. Before completing this section, check one box to indicate whether this is a new application or a revision.

<table>
<thead>
<tr>
<th>AQMD Device #:</th>
<th>Provide the identification number for each AQMD-assigned device subject to Phase II requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPA Unit #:</td>
<td>Provide the identification number for each EPA-assigned device subject to Phase II requirements.</td>
</tr>
<tr>
<td>Will device need a Repowering Extension Plan?:</td>
<td>Indicate with a &quot;yes&quot; or &quot;no&quot; if the device is or will be participating under a Repowering Extension Plan.</td>
</tr>
<tr>
<td>Has device started operations on or after 11/15/90?:</td>
<td>Indicate with a &quot;yes&quot; or &quot;no&quot; if the device was source tested or started operating on or after November 15, 1990.</td>
</tr>
<tr>
<td>Device Operations Start Date:</td>
<td>Complete this column only if the device was source tested or started operating on or after November 15, 1990. Provide the date (mo/day/yr) when the device started or will start operating. Note: If the date of beginning operations changes, an administrative permit revision application will be required.</td>
</tr>
<tr>
<td>For Devices starting-up after 11/15/90, provide date when Monitoring Certification will begin:</td>
<td>Complete this column only if the device was source tested or started operating on or after November 15, 1990. Provide the date (mo/day/yr) when compliance with the monitoring procedures for the device will begin. Refer to 40 CFR Part 75.4 to determine this date. Note: If the monitoring certification date changes, an administrative permit revision application will be required.</td>
</tr>
</tbody>
</table>
Attachment 2
Minor Title V Permit Change Request
(June 28, 2016)
June 28, 2016

Brian L. Yeh  
Sr. Air Quality Engineering Manager  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA  91765-4182

Subject:  **Walnut Creek Energy Park - Facility ID 146536**  
**RECLAIM/Title V Facility Permit**

Dear Mr. Yeh:

On January 19, 2016, Walnut Creek Energy, LLC (WCE) submitted a permit application package to the SCAQMD requesting several changes to conditions in the RECLAIM/Title V permit for the Walnut Creek Energy Park (WCEP). In addition to these changes, we are requesting a change to the ammonia emission (i.e., “slip”) limit in the WCEP RECLAIM/Title V permit for clarification purposes. In the equipment description/permit limit summary table in Section H of the WCEP RECLAIM/Title V permit, the ammonia slip limit is listed as 5 part per million by volume (ppmv) for Device Numbers C4, C10, C16, C22, and C28. However, in Section H of the RECLAIM/Title V permit Condition A195.4 refers to an ammonia emission limit of 5.0 ppmv (see Attachment 1). We believe that “5.0” is referenced in error in Section H of the WCEP permit. To support this position, we reviewed several recently issued SCAQMD permits. In the AES Huntington Beach permit (Permit to Operate issued June 3, 2016) ammonia emission limit is consistently referred to as 5 ppmv (see Attachment 2). A 5 ppmv ammonia slip limit is also consistently referred to in the SCAQMD permits for El Segundo Power (see Attachment 3) and CPV Sentinel (see Attachment 4) facilities. Furthermore, we believe that these permits represent that the Best Available Control Technology (BACT) limit for ammonia slip has been demonstrated to be 5 ppmv. Therefore, WCE requests SCAMD correct the WCEP ammonia emission limit to 5 ppmv in all areas where referenced (i.e., Section D and Section H), which will align this permit with other more recent permits such as AES Huntington Beach’s. Specifically, WCE requests the following change to Permit Condition A195.4 (changes shown in strikethrough/underline format):
A195.4 The 5.0 PPMV NH3 emission limit(s) is averaged over 60 minutes at 15% O2, dry basis. The operator shall calculate and continuously record the NH3 slip concentration using the following…

If you have any questions or need further information, please don’t hesitate to contact Heather Macleod at (626) 968-0360, or George.Piantka@nrg.com at (760) 710-2156.

Sincerely,

George L. Piantka, PE
Sr. Director, Regulatory Environmental Services
NRG Energy, West Region

Attachments

cc: Christian Aviles, SCAQMD
Camille Remy Obad, CEC
Rick McPherson, NRG Energy
Heather MacLeod, NRG Energy
Apeetha Jain, NRG Energy
Tom Andrews, Sierra Research
ATTACHMENT 1

WALNUT CREEK ENERGY PARK PERMIT
FACILITY PERMIT TO OPERATE

WALNUT CREEK ENERGY, LLC
911 BIXBY DR
CITY OF INDUSTRY, CA 91745

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance
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<table>
<thead>
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<tr>
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<tr>
<td>A</td>
<td>NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219</td>
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<td>05/04/2012</td>
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<tr>
<td>B</td>
<td>Rule Emission Limits</td>
<td>1</td>
<td>05/04/2012</td>
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FACILITY PERMIT TO OPERATE
WALNUT CREEK ENERGY, LLC

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: WALNUT CREEK ENERGY, LLC
LEGAL OPERATOR (if different than owner):
EQUIPMENT LOCATION: 911 BIXBY DR
                   CITY OF INDUSTRY, CA 91745-1702
MAILING ADDRESS: 911 BIXBY DR
                   CITY OF INDUSTRY, CA 91745
RESPONSIBLE OFFICIAL: RICK MCPHERSON
TITLE: PLANT MANAGER
TELEPHONE NUMBER: (626) 968-0360
CONTACT PERSON: HEATHER MACLEOD
TITLE: ENVIRONMENTAL SPECIALIST
TELEPHONE NUMBER: (626) 968-0360
INITIAL TITLE V PERMIT ISSUED: May 05, 2011
TITLE V PERMIT EXPIRATION DATE: May 04, 2016

<table>
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<td>YES</td>
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<td></td>
<td>SOx:</td>
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<tr>
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</tr>
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<td></td>
<td>CYCLE:</td>
</tr>
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<td></td>
<td>ZONE:</td>
</tr>
<tr>
<td></td>
<td>INLAND</td>
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# FACILITY PERMIT TO OPERATE
**WALNUT CREEK ENERGY, LLC**

**SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE**

The operator shall comply with the terms and conditions set forth below:

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<tr>
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<th>ID No.</th>
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<th>RECLAIM Source Type/ Monitoring Unit</th>
<th>Emissions And Requirements</th>
<th>Conditions</th>
</tr>
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<tbody>
<tr>
<td>Process 1</td>
<td></td>
<td>INTERNAL COMBUSTION</td>
<td></td>
<td></td>
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<tr>
<td>System 1</td>
<td></td>
<td>GAS TURBINES, POWER GENERATION</td>
<td></td>
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* (1) (IA) (IB) Denotes RECLAIM emission factor
(2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device
FACILITY PERMIT TO OPERATE
WALNUT CREEK ENERGY, LLC

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</tr>
</thead>
<tbody>
<tr>
<td>GAS TURBINE, UNIT NO. 1,</td>
<td></td>
<td>C3</td>
<td>NOX: MAJOR, SOX: PROCESS UNIT**</td>
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</tr>
<tr>
<td>NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A:N: 538796</td>
<td></td>
<td></td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2)] - PSD-BACT, 10-7-1988, CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982], NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2)] - PSD-BACT, 10-7-1988: RULE 2005, 5-6-2005], NOX: 10.73 LBS/MMMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005], NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], NOX: 123.46 LBS/MMMSCF (1) [RULE 2012, 5-6-2005], PM10: 0.01 GRAINS/MMSCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 473, 8-7-1978], PM10: 0.1 GRAINS/MMSCF NATURAL GAS (5B) [RULE 409, 8-7-1981], PM10: 11 LBS/MMSCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 473, 8-7-1978], SO2 (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997], SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], SOX: 0.67 LBS/MMMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT.</td>
<td>A63.1, A99.1, A99.2, A99.3, A99.4, A99.5, A195.1, A195.2, A195.3, A227.1, C1.1, D11.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, E23.1, I298.1, I298.7, K40.1, K67.1</td>
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* (1) (1A) (1B) Denotes RECLAIM emission factor
(2) (2A) (2B) Denotes RECLAIM emission rate
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### FACILITY PERMIT TO OPERATE

**WALNUT CREEK ENERGY, LLC**

### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PROCESS 1: INTERNAL COMBUSTION</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GENERATOR, 106.1 NET MW (104 GROSS MW)</td>
<td>C3</td>
<td></td>
<td></td>
<td>S-10-1996; RULE 1303(a)(1) - BACT, 12-6-2002</td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, NO. 1, BASF CAMEL, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME</td>
<td>C3</td>
<td>D1 C4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit to Construct Issued: 09/28/12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 1, HALDOR-TOPSOE DNX-629, 1272 CUB FT.; WIDTH: 19 FT 6 IN; HEIGHT: 33 FT; LENGTH: 2 FT 6 IN WITH</td>
<td>C4</td>
<td>C3 S6</td>
<td></td>
<td>NH3 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) - BACT. S-10-1996; RULE 1303(a)(1) - BACT. 12-6-2002]</td>
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</tr>
<tr>
<td>Permit to Construct Issued: 09/28/12</td>
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<td>A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1</td>
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<tr>
<td>AMMONIA INJECTION, GRID STACK, NO. 1, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN</td>
<td>S6</td>
<td>C4</td>
<td></td>
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<tr>
<td>Permit to Construct Issued: 09/28/12</td>
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**Notes:**

1. (1) (1A) (1B) Denotes RECLAIM emission factor
2. (2) (2A) (2B) Denotes RECLAIM emission rate
3. (3) Denotes RECLAIM concentration limit
4. (4) Denotes BACT emission limit
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<tbody>
<tr>
<td>NATURAL GAS, GENERAL. ELECTRIC, MODEL LMS100PA. SIMPLE CYCLE, INTERCOOLED. 8917 MM BTU/HRS AT 30 DEGREES F. WITH WATER INJECTION WITH A/N: 538801</td>
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<td></td>
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Permit to Construct Issued: 09/28/12

*Bold text indicates emission factor or rate.

**Bold text in parentheses indicates emission limit.

(1) (1A) (1B) Denotes RECLAIM emission factor
(2) (2A) (2B) Denotes RECLAIM emission rate
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<th>Emissions And Requirements</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>GENERATOR, 100.1 NET MW (104 GROSS MW)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, NO. 2, BASF CAMEL, WITH 426 CUBIC FEET OF TOTAL CATALYST VOLUME</td>
<td>C9</td>
<td>D7 C10</td>
<td>5-10-1996; RULE 1303(a)(1) - BACT. 12-6-2002</td>
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</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 2, HALDOR-TOPSOE DNX-629, 1272 CUB. FT.; WIDTH: 19 FT 6 IN.; HEIGHT: 33 FT; LENGTH: 2 FT 6 IN. WITH</td>
<td></td>
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<td></td>
<td>NH3 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) - BACT. 5-10-1996; RULE 1303(a)(1)-BACT. 12-6-2002]</td>
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**FACILITY PERMIT TO OPERATE**

**WALNUT CREEK ENERGY, LLC**

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<th>Emissions* Conditions</th>
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<tr>
<td>GAS TURBINE, UNIT NO 3,</td>
<td>D13</td>
<td>C15</td>
<td>NOx, Major Source**, SOx: Process Unit**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1903(a)(2) - PSD-BACT, 10-7-1988], NOx: 2.5 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981], SOx: 538.8 LBS/MMSCF NATURAL GAS (6) [40 CFR 60 Subpart KKKK, 7-6-2006]; NOx: 123.46 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005], PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-4-1976; RULE 475, 8-7-1978], PM10: 0,1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981], PM10: 11 LBS/MMSCF NATURAL GAS (5A) [RULE 475, 10-4-1976; RULE 475, 8-7-1978], SO2: 9 [40 CFR 72, Acid Rain Provisions, 11-24-1997], SOx: 0.06 LBS/MMBTU NATURAL GAS (8) [40 CFR 60 Subpart KKKK, 7-6-2006], SOX: 0.06 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005], VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT].</td>
</tr>
<tr>
<td>ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F. WITH WATER INJECTION WITH A/N: 538804</td>
<td>Permit to Construct Issued: 09/28/12</td>
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**Notes:**

1. (1A) (1B) Denotes RECLAIM emission factor
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**Section H**

**Date:** September 28, 2012
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<td></td>
<td></td>
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<tr>
<td>GENERATOR, 100.1 NET MW (104 GROSS MW)</td>
<td>C15</td>
<td>D13 C16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 3, HALDOR-TOPSOE DNX-629, 1272 C.U.F.T., WIDTH: 19 FT 6 IN; HEIGHT: 33 FT; LENGTH: 2 FT 6 IN WITH</td>
<td>S18</td>
<td>C16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AMMONIA INJECTION, GRID STACK, NO. 3, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN</td>
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WALNUT CREEK ENERGY, LLC

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<tbody>
<tr>
<td>GAS TURBINE, UNIT NO. 4, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 538807</td>
<td>D19</td>
<td>C21</td>
<td>NOX: MAJOR SOURCE**, SOX: PROCESS UNIT**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 170(a)(2) - PSD-BACT, 10-7-1988], CO 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982], NOX: 2.5 PPMV NATURAL GAS (4) [RULE 170(a)(2) - PSD-BACT, 10-7-1988], RULE 2006, 5-6-2005], NOX: 10.73 LBS/MMSCF (1A) [RULE 2012, 5-6-2005], NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], NOX: 123.46 LBS/MMSCF (1) [RULE 2012, 5-6-2005], PM10: 0.01 GRAINS/MMSCF NATURAL GAS (5) [RULE 475, 10-8-1976, RULE 475, 8-7-1978], PM10: 0.1 GRAINS/MMSCF NATURAL GAS (5B) [RULE 400, 8-7-1981], PM10: 11 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], SOX: 0.07 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], SOX: 0.07</td>
<td>A63.1, A99.1, A99.2, A99.3, A99.4, A99.5, A195.1, A195.2, A195.3, A195.4, A27.1, C11.1, D12.1, D19.1, D19.2, D19.3, D82.1, D82.2, E193.1, H23.1, E298.4, E298.10, K40.1, K57.1</td>
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(5) (5A) (5B) Denotes command and control emission limit
(6) Denotes air toxics control rule limit
(7) Denotes NSR applicability limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits
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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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<th>Emissions* And Requirements</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>GENERATOR, 190 I NET MW (104 GROSS MW)</td>
<td>C21</td>
<td>D19 C22</td>
<td>5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 4, HALDOR-TOPSOE DNX-629, 1272 CU FT; WIDTH: 19 FT 6 IN, HEIGHT: 33 FT 1 IN, LENGTH: 2 FT 6 IN WITH A/N: 538816</td>
<td>S24</td>
<td>C22</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AMMONIA INJECTION, GRID STACK, NO. 4, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN A/N: 538807</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
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(3) Denotes RECLAIM concentration limit
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(9) See App B for Emission Limits

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</tr>
</thead>
<tbody>
<tr>
<td>GAS TURBINE, UNIT NO. 5</td>
<td>D25</td>
<td>C27</td>
<td>NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988, RULE 2005, 5-6-2005]; NOX: 10.73 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 123.46 LBS/MMSCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1976]; PM10: 0.1 GRAMS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT.</td>
<td></td>
</tr>
<tr>
<td>ELECTRIC, MODEL LMS400PA, SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N 538808</td>
<td>Permit to Construct Issued: 09/28/12</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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* (2) (2A) (2B) Denotes RECLAIM emission rate
* (3) Denotes RECLAIM concentration limit
* (4) Denotes BACT emission limit
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* (7) Denotes NSR applicability limit
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<tbody>
<tr>
<td><strong>Process: INTERNAL COMBUSTION</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GENERATOR, 100.1 NET MW (104 GROSS MW)</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, NO. 5, BASF CAMEL, WITH 420 CUBIT FEET OF TOTAL CATALYST VOLUME</td>
<td>C27</td>
<td>D25 C28</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A/N: 538825</td>
<td></td>
<td></td>
<td>5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002</td>
<td></td>
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<td>C28</td>
<td>C27 S30</td>
<td>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)] -BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002</td>
<td></td>
<td></td>
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<tr>
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<td>S30</td>
<td>C28</td>
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<td></td>
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<tr>
<td>A/N: 538808</td>
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### System 2: EMERGENCY FIRE PUMP

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<td><strong>INTERNAL COMBUSTION</strong></td>
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<td></td>
</tr>
<tr>
<td>INTERNAL COMBUSTION ENGINE, EMERGENCY FIRE, LEAN BURN, DIESEL FUEL, CLARKE MODEL JUG6-UPADS58, WITH AFTERCOOLER, TURBOCHARGER, 183 BHP</td>
<td>D34</td>
<td></td>
<td>NOX: PROCESS UNIT**; SOX PROCESS UNIT**</td>
<td>CO: 0.9 GRAM/BHP-HR DIESEL (4) [RULE 1703(a)(2)] - PSD-BACT, 10-7-1988; NOX: 450 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; NOx + ROG: 2.8 GRAM/BHP-HR DIESEL (4) [RULE 1703(a)(2)] - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005; PM10: 0.1 GRAM/BHP-HR DIESEL (4) [RULE 133(b)(1)-BACT, 5-10-1996; RULE 1303(a)(1) - BACT, 12-6-2002]; SOX 0.004 GRAM/BHP-HR DIESEL (4) [RULE 1703(a)(2)] - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005; SOX: 0.103 LBS/1000 GAL (1) [RULE 2011, 5-6-2005]</td>
<td>C1.3, D12.5, D12.6, E193.1, E193.2, E298.6, K67.2</td>
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<tr>
<td><strong>INORGANIC CHEMICAL STORAGE</strong></td>
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<td></td>
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</tr>
<tr>
<td>STORAGE TANK, FIXED ROOF, TK-1, AMMONIA, 19 PERCENT AQUEOUS AMMONIA WITH FRV SETTING AT 25 PSI, 16000 GALS; DIAMETER: 10 FT, HEIGHT: 24 FT</td>
<td>D31</td>
<td></td>
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<td>C1.57.1, E144.1, E193.1</td>
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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition: D1, D7, D13, D19, D25]

A195.1 The 4.0 PPMV CO emission limit(s) is averaged over 60 minutes at 15% O2, dry.

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988]

[Devices subject to this condition: D1, D7, D13, D19, D25]

A195.2 The 2.5 PPMV NOX emission limit(s) is averaged over 60 minutes at 15% O2, dry.

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]

[Devices subject to this condition: D1, D7, D13, D19, D25]

A195.3 The 2.0 PPMV VOC emission limit(s) is averaged over 60 minutes at 15% O2, dry.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: D1, D7, D13, D19, D25]

A195.4 The 5.0 PPMV NH3 emission limit(s) is averaged over 60 minutes at 15% O2, dry basis. The operator shall calculate and continuously record the NH3 slip concentration using the following:
The operator shall comply with the terms and conditions set forth below:

\[
NH_3 \text{ (ppmv)} = \frac{[a-b*c/10^6]*10^6/b}{a = NH_3 \text{ injection rate (lb/hr)/17 lb-lb-mol}} \]
\[
b = \text{dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol} \]
\[
c = \text{change in measured NOx across the SCR (ppmvd at 15% O2)} \]

The operator shall install and maintain a NOX analyzer to measure the SCR inlet NOx ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months.

The NOx analyzer shall be installed and operated within 90 days of initial start-up.

The operator shall use the above described method or other alternative method approved by the Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2012, 5-6-2005]

[Devices subject to this condition : C4, C10, C16, C22, C28]

A327.1 For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[RULE 475, 10-8-1976; RULE 475, 8-7-1978]

[Devices subject to this condition : D1, D7, D13, D19, D25]

C. Throughput or Operating Parameter Limits
ATTACHMENT 2

AES HUNTINGTON BEACH PERMIT
FACILITY PERMIT TO OPERATE

AES HUNTINGTON BEACH, LLC
21730 NEWLAND ST
HUNTINGTON BEACH, CA 92646

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Wayne Nastri
Acting Executive Officer

By _____________________
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance
FACILITY PERMIT TO OPERATE
AES HUNTINGTON BEACH, LLC

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: AES HUNTINGTON BEACH, LLC

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 21730 NEWLAND ST
HUNTINGTON BEACH, CA 92646

MAILING ADDRESS: 21730 NEWLAND ST
HUNTINGTON BEACH, CA 92646

RESPONSIBLE OFFICIAL: WEIKKO WIRTA

TITLE: PLANT MANAGER

TELEPHONE NUMBER: (714) 374-1421

CONTACT PERSON: WEIKKO WIRTA

TITLE: PLANT MANAGER

TELEPHONE NUMBER: (714) 374-1421

TITLE V PERMIT ISSUED: April 29, 2016

TITLE V PERMIT EXPIRATION DATE: April 28, 2021

<table>
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<tr>
<th>TITLE V</th>
<th>RECLAIM</th>
</tr>
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<tbody>
<tr>
<td>YES</td>
<td>NOx:</td>
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<tr>
<td></td>
<td>SOx:</td>
</tr>
<tr>
<td></td>
<td>CYCLE:</td>
</tr>
<tr>
<td></td>
<td>ZONE:</td>
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<td></td>
<td>C120 C121 S123</td>
<td>NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**</td>
<td>CO: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; CO2: 1000 LBS/GROSS MWH NATURAL GAS (8) [40CFR 60 Subpart TTTT, 10-23-2015]; NOX: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19.09 LBS/MMMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/HR (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.71 LBS/MMMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2</td>
<td>A63.6, A63.7, A99.4, A195.7, A195.8, A195.9, A237.1, B61.1, C1.7, C1.8, C1.9, C1.12, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.5, E193.6, E448.1, I297.1, I298.1, K40.3, K67.5</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>GENERATOR, 236.1 MW GROSS AT 32 DEGREES F</td>
<td>C120 D115</td>
<td></td>
<td></td>
<td></td>
<td>D12.10, E193.4</td>
</tr>
<tr>
<td>GENERATOR, HEAT RECOVERY STEAM</td>
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<td></td>
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</tr>
<tr>
<td>TURBINE, STEAM, COMMON WITH GAS TURBINE NO. 2, 221.4 MW GROSS AT 32 DEGREES F</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, BASF, SERVING GAS TURBINE NO. 1, WITH 328.8 CU FT OF TOTAL CATALYST VOLUME A/N:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, CORMETECH, TITANIUM/VANADIUM/TUNGSTEN, SERVING UNIT NO 1, 2761 CU FT OF TOTAL CATALYST VOLUME, WIDTH: 1 FT 6 IN; HEIGHT: 71 FT 7.2 IN; LENGTH: 25 FT 8.4 IN WITH A/N:</td>
<td>C121 D115</td>
<td></td>
<td></td>
<td></td>
<td>A195.10, D12.7, D12.8, D12.9, E193.4</td>
</tr>
<tr>
<td>AMMONIA INJECTION, INJECTION GRID</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>STACK, SERVING TURBINE NO. 1, HEIGHT: 150 FT; DIAMETER: 20 FT A/N:</td>
<td>S123 D115</td>
<td></td>
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<th>Emissions* And Requirements</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>GAS TURBINE, UNIT NO. 2, COMBINED CYCLE, GE MODEL 7FA.05, 2273 MMBTU/HR AT 32 DEGREES F WITH DRY LOW NOX COMBUSTOR, GE DLN 2.6 WITH A/N:</td>
<td>D124</td>
<td>C129 C130 S132</td>
<td>NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**</td>
<td>CO: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; CO2: 1000 LBS/GROSS MWH NATURAL GAS (8A) [40CFR 60 Subpart TTTT, 10-23-2015]; NOX: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19.09 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/HR (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.71 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2</td>
<td>A63.6, A63.7, A99.4, A195.6, A195.7, A195.8, A195.9, A527.1, B61.1, C1.7, C1.8, C1.9, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.5, E193.6, E448.1, I297.1, I298.1, K40.3, K67.5</td>
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(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

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<tbody>
<tr>
<td>Process 3: Power Generation - Gas Turbines</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GENERATOR, 236.1 MW GROSS AT 32 DEGREES F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GENERATOR, HEAT RECOVERY STEAM</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TURBINE, STEAM, COMMON WITH GAS TURBINE NO. 1, 221.4 MW GROSS AT 32 DEGREES F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, BASF, SERVING GAS TURBINE NO. 2, WITH 328.8 CU FEET OF TOTAL CATALYST VOLUME A/N:</td>
<td>C129</td>
<td>D124</td>
<td>PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</td>
<td></td>
<td>D12.10, E193.4</td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, CORMETECH, TITANIUM/VANADIUM/TUNGSTE N, SERVING UNIT NO. 2, 2761 CU FT OF TOTAL CATALYST VOLUME, WIDTH: 1 FT 6 IN; HEIGHT: 71 FT 7.2 IN; LENGTH: 25 FT 8.4 IN WITH A/N: AMMONIA INJECTION, INJECTION GRID</td>
<td>C130</td>
<td>D124</td>
<td>NH3: 5 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</td>
<td></td>
<td>A195.10, D12.7, D12.8, D12.9, E193.4</td>
</tr>
<tr>
<td>STACK, SERVING UNIT NO. 2, HEIGHT: 150 FT; DIAMETER: 20 FT A/N:</td>
<td>S132</td>
<td>D124</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
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(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits
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**AES HUNTINGTON BEACH, LLC**

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<tbody>
<tr>
<td>Process 3: Power Generation - Gas Turbines</td>
<td>D133</td>
<td>C135 C136 S138</td>
<td>NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 25.11 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/MMBTU (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SOX: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.71 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.71 LBS/MMBTU NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996];</td>
<td>A63.8, A63.9, A99.5, A195.8, A195.11, A195.12, A327.1, B61.1, C1.10, C1.11, C1.12, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.7, E193.8, E448.2, E448.3, I297.2, I298.2, K40.3, K67.5</td>
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## AES HUNTINGTON BEACH, LLC

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<tr>
<td>Process 3: Power Generation - Gas Turbines</td>
<td></td>
<td></td>
<td></td>
<td>RULE 1303(a)(1)-BACT, 12-6-2002</td>
<td></td>
</tr>
<tr>
<td>GENERATOR, 100.8 MW GROSS AT 65.8 DEGREES F</td>
<td>C135</td>
<td>D133</td>
<td></td>
<td></td>
<td>D12.10, E193.4</td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, BASF CAMET, SERVING GAS TURBINE NO. 3, WITH 165.6 CU FT OF TOTAL CATALYST VOLUME A/N:</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>AMMONIA INJECTION, INJECTION GRID</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>STACK, SERVING UNIT NO. 3, HEIGHT: 80 FT; DIAMETER: 13 FT 6 IN A/N:</td>
<td>S138</td>
<td>D133</td>
<td></td>
<td></td>
<td></td>
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</table>

**GAS TURBINE, UNIT NO. 4, SIMPLE CYCLE, GE MODEL LMS100PB, NATURAL GAS, 885 MMBTU/HR AT 65.8 DEG F, INTERCOOLED, WITH DRY LOW NOX COMBUSTOR WITH A/N:**

- **ID No.**: D139  
- **Connected To**: C141 C142 S144  
- **RECLAIM Source Type/ Monitoring Unit**: NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**  
- **Emissions And Requirements**: CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 25.11 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.06 LBS/MMBTU NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996];  
- **Conditions**: A63.8, A63.9, A99.5, A195.8, A195.11, A195.12, A327.1, B61.1, C1.10, C1.11, C1.12, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.7, E193.8, E448.2, E448.3, I297.2, I298.2, K40.3, K67.5

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(3) Denotes RECLAIM concentration limit  
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</tr>
<tr>
<td>GENERATOR, 100.8 MW GROSS AT 65.8 DEG F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, BASF CAMET, SERVING GAS TURBINE NO. 4, WITH 165.6 CU FT OF TOTAL CATALYST VOLUME, HEIGHT: 120 FT ; DIAMETER: 18 FT</td>
<td>C141</td>
<td>D139</td>
<td></td>
<td></td>
<td>D12.10, E193.4</td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, CORMETECH CMHT, TITANIUM/VANADIUM/TUNGSTE N, SERVING UNIT NO. 4, WITH 622 CU FT OF TOTAL CATALYST VOLUME, WIDTH: 4 FT 10.8 IN; HEIGHT: 11 FT 7.2 IN; LENGTH: 11 FT WITH A/N:</td>
<td>C142</td>
<td>D139</td>
<td></td>
<td></td>
<td>A195.10, D12.11, D12.12, D12.13, E193.4</td>
</tr>
<tr>
<td>AMMONIA INJECTION, INJECTION GRID</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>STACK, SERVING UNIT NO. 4, HEIGHT: 80 FT ; DIAMETER: 13 FT 6 IN</td>
<td>S144</td>
<td>D139</td>
<td></td>
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<td></td>
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<tbody>
<tr>
<td>BOILER, AUXILIARY, RENTECH, MODEL D TYPE, WATER TUBE, NATURAL GAS, WITH LOW NOX BURNER, FLUE GAS RECIRCULATION, 71 MMBTU/HR WITH A/N:</td>
<td>D145</td>
<td>C147 S149</td>
<td>CO: 50 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 400 PPMV NATURAL GAS (5) [RULE 1146, 11-1-2013]; CO: 2000 PPMV NATURAL GAS (5A) [RULE 407, 4-2-1982]; NOX: 5 PPMV NATURAL GAS (4) [RULE 2005, 12-4-2015]; NOX: 49.18 LBS/MMMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.83 LBS/MMMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]</td>
<td>A63.10, A195.13, A195.14, C1.13, C1.14, CI97.3, D29.8, D29.9, D82.5, E193.4, I297.3, I298.3</td>
<td></td>
</tr>
<tr>
<td>BURNER, IZHC/COEN RMB, NATURAL GAS, WITH LOW NOX BURNER, FLUE GAS RECIRCULATION, 71 MMBTU/HR</td>
<td>D145</td>
<td>C147 S149</td>
<td>CO: 50 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 400 PPMV NATURAL GAS (5) [RULE 1146, 11-1-2013]; CO: 2000 PPMV NATURAL GAS (5A) [RULE 407, 4-2-1982]; NOX: 5 PPMV NATURAL GAS (4) [RULE 2005, 12-4-2015]; NOX: 49.18 LBS/MMMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.83 LBS/MMMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]</td>
<td>A63.10, A195.13, A195.14, C1.13, C1.14, CI97.3, D29.8, D29.9, D82.5, E193.4, I297.3, I298.3</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STACK, SERVING THE AUXILIARY BOILER, HEIGHT: 80 FT; DIAMETER: 3 FT A/N:</td>
<td>S149</td>
<td>D145</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STORAGE TANK, HORIZONTAL, AQUEOUS AMMONIA, 19 PERCENT, 35000 GALS; DIAMETER: 13 FT; LENGTH: 45 FT A/N:</td>
<td>D150</td>
<td></td>
<td></td>
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<td>C157.1, E144.1, E193.4</td>
</tr>
<tr>
<td>STORAGE TANK, HORIZONTAL, NATURAL GAS, AQUEOUS AMMONIA, 19 PERCENT, 15000 GALS; DIAMETER: 6 FT; LENGTH: 18 FT A/N:</td>
<td>D151</td>
<td></td>
<td></td>
<td></td>
<td>C157.1, E144.1, E193.4</td>
</tr>
<tr>
<td>OIL WATER SEPARATOR A/N:</td>
<td>D152</td>
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<tr>
<td>OIL WATER SEPARATOR, HEAT RECOVERY STEAM A/N:</td>
<td>D153</td>
<td></td>
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  (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
  (9) See App B for Emission Limits
  (10) See section J for NESHAP/MACt requirements

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The operator shall comply with the terms and conditions set forth below:

A195.9 The 1000 LBS/MW-HR CO\textsubscript{2} emission limit(s) is averaged over a rolling 12 operating month basis. The limit shall only apply if the turbine supplies more than 1,519,500 MWh net electrical output to a utility distribution system over a rolling 12 operating month basis and a 3 year rolling average basis.

\[
\text{NH}_3 \text{ (ppmv) } = [a-b*(c*1.2)/1E+06]*1E+06/b
\]

1. where,
2. \( a = \text{NH}_3 \text{ injection rate (lbs/hr)/17(lb/lb-mol)} \)
3. \( b = \text{dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol} \)
4. \( c = \text{change in measured NOx across the SCR (ppmvd at 15\% O2)} \)

The operator shall install and maintain a NOx analyzer to measure the SCR inlet NOx ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months. The NOx analyzer shall be installed and operated within 90 days of initial start-up.

The operator shall use the above described method or another alternative method approved by the Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

[40CFR 60 Subpart TTTT, 10-23-2015]

[Devices subject to this condition : D115, D124]

A195.10 The 5 PPMV NH\textsubscript{3} emission limit(s) is averaged over 60 minutes at 15\% O\textsubscript{2}, dry basis. The operator shall calculate and continuously record the NH3 slip concentration using the following:
The operator shall comply with the terms and conditions set forth below:

\[
\text{NH}_3 \text{ (ppmv)} = \left[ a - b \left( c \times 1.2 \right) / 1 \times 10^6 \right] \times 10^6 / b.
\]

where

1. \( a \) = NH\(_3\) injection rate (lbs/hr)/17(lb/lb-mol)
2. \( b \) = dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol)
3. \( c \) = change in measured NO\(_x\) across the SCR (ppmvd at 15\% O\(_2\))

The operator shall install and maintain a NO\(_x\) analyzer to measure the SCR inlet NO\(_x\) ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months. The NO\(_x\) analyzer shall be installed and operated within 90 days of initial start-up.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

The operator shall use the above described method or another alternative method approved by the Executive Officer.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C121, C130, C136, C142, C147]

A195.11 The 2.5 PPMV NO\(_x\) emission limit(s) is averaged over 60 minutes at 15 percent O\(_2\), dry. This limit shall not apply during commissioning, turbine start ups and turbine shutdowns.

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]

[Devices subject to this condition : D133, D139]

A195.12 The 4.0 PPMV CO emission limit(s) is averaged over 60 minutes at 15 percent O\(_2\), dry. This limit shall not apply during commissioning, turbine start ups and turbine shutdowns.
ATTACHMENT 3

EL SEGUNDO POWER PERMIT
NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance
**SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS**

The operator shall comply with the terms and conditions set forth below:

<table>
<thead>
<tr>
<th>Equipment</th>
<th>ID No.</th>
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<th>RECLAIM Source Type/ Monitoring Unit</th>
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<th>Conditions</th>
</tr>
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<tbody>
<tr>
<td>Process 1: INTERNAL COMBUSTION</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>System 2: GAS TURBINE POWER GENERATION</td>
<td></td>
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<td></td>
</tr>
</tbody>
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* (1) (1A) (1B) Denotes RECLAIM emission factor
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  (3) Denotes RECLAIM concentration limit
  (4) Denotes BACT emission limit
  (5) (5A) (5B) Denotes command and control emission limit
  (6) Denotes air toxic control rule limit
  (7) Denotes NSR applicability limit
  (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
  (9) See App B for Emission Limits
  (10) See section J for NESHAP/MACT requirements

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<tr>
<td>Process 1: INTERNAL COMBUSTION</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GAS TURBINE, UNIT NO. 5, NATURAL GAS, SIEMENS, MODEL SGT6-5000F RAPID-RESPONSE, COMBINED CYCLE, 2,096 MMJH/HR AT 78 DEGREES F, WITH DRY LOW-NOX COMBUSTORS WITH A/N: 470652</td>
<td>D67</td>
<td>C75</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2)] - PSD-BACT, 10-7-1988; A99.8, A99.9; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; PM: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF NATURAL GAS (5A) [RULE 409, 8-7-1981]; PM: 11 LBS/MMJH NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMJH NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</td>
<td>A63.2, A99.7, A99.8, A99.9, A195.8, A195.9, A195.10, A327.1, A433.1, B61.2, D12.10, D29.8, D29.9, D82.4, D82.5, E193.2, K40.4, K67.5</td>
</tr>
</tbody>
</table>
| **(1) (1A) (1B) Denotes RECLAIM emission factor
(2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits
(10) See section J for NESHAP/MACT requirements**

* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.
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<th>RECLAIM Source Type/ Monitoring Unit</th>
<th>Emissions* And Requirements</th>
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<tbody>
<tr>
<td>INTERNAL COMBUSTION</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GENERATOR, 219 MW</td>
<td>C75</td>
<td>D67 C76</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, UNIT NO. 5, BASF, 290 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 470653</td>
<td>C75</td>
<td></td>
<td>NH3: 5 PPMV NATURAL GAS</td>
<td>A195.11, D12.11, D12.12, D12.13, E179.5, E179.6, E193.2</td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, UNIT NO. 5, CORMETECH, MODEL CM21HT, WITH 2,050 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 25 FT; HEIGHT: 70 FT; LENGTH: 24 FT 3 IN WITH A/N:</td>
<td>C76</td>
<td>C75 S78</td>
<td>RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002</td>
<td></td>
</tr>
<tr>
<td>AMMONIA INJECTION, GRID</td>
<td>S78</td>
<td>C76</td>
<td></td>
<td></td>
</tr>
<tr>
<td>STACK, NO. 5, HEIGHT: 210 FT; DIAMETER: 20 FT 11 IN A/N: 470652</td>
<td></td>
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<td></td>
</tr>
</tbody>
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(3) Denotes RECLAIM concentration limit
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(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
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<tr>
<td>Process 1: INTERNAL COMBUSTION</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>GAS TURBINE, UNIT NO.7, NATURAL GAS, SIEMENS, MODEL SGT6-5000F RAPID-RESPONSE, COMBINED CYCLE, 2,096 MMBTU/HR AT 78 DEGREES F, WITH DRY LOW-NOX COMBUSTORS WITH A/N: 470656</td>
<td>D68</td>
<td>C79</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002; RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; PM: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF NATURAL GAS (5A) [RULE 409, 8-7-1981]; PM: 11 LBS/MMBTU NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]</td>
<td>A63.2, A99.7, A99.8, A99.9, A195.8, A195.9, A195.10, A327.1, A433.1, B61.2, D12.10, D29.8, D29.9, D82.4, D82.5, E193.2, K40.4, K67.5</td>
</tr>
</tbody>
</table>

** Generator, Heat Recovery Turbine, Steam, Unfired Turbine, Steam, 67.7 MW

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) (3) (3A) (3B) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.
## SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Generator, 219 MW</td>
<td>C79</td>
<td>D68 C80</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO Oxidation Catalyst, Unit No. 7, BASF, 290 Cubic Feet of Total Catalyst Volume A/N: 470654</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Selective Catalytic Reduction, Unit No. 7, Cormetech, Model CM21HT, with 2,050 Cubic Feet of Total Catalyst Volume, Width: 25 ft; Height: 70 ft; Length: 24 ft in with A/N:</td>
<td>C80</td>
<td>C79 S82</td>
<td>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonia Injection, Grid Stack, No. 7, Height: 210 ft; Diameter: 20 ft 11 in A/N: 470656</td>
<td>S82</td>
<td>C80</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>Process 2: EXTERNAL COMBUSTION</strong></td>
<td></td>
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</tr>
<tr>
<td>System 2: BOILER, POWER GENERATION</td>
<td></td>
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(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.
### FACILITY PERMIT TO OPERATE
### EL SEGUNDO POWER, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NORTH AND SOUTH DUCTS, VANADIUM/TITANIUM CATALYST BED, WITH 4058 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 28 FT 6 IN; HEIGHT: 17 FT ; LENGTH: 68 FT WITH A/N: 464316</td>
<td>C32</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AMMONIA INJECTION, GRID, WITH 300 NOZZLES</td>
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</tr>
</tbody>
</table>

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** (1) (1A) (1B) Denotes RECLAIM emission factor
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(3) Denotes RECLAIM concentration limit
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(8) (8A) (8B) Denotes CFR limit (e.g. NSPS, NESHAPS, etc.)
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<tbody>
<tr>
<td><strong>Process 5:</strong> INORGANIC CHEMICAL STORAGE</td>
<td></td>
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</tr>
<tr>
<td>STORAGE TANK, UNDERGROUND, TK-001, AQUEOUS AMMONIA, CARBON STEEL, DOUBLE WALLED, WITH 3 TRANSFER PUMPS AND A PRV SET AT 50 PSIG, 20000 GALS; DIAMETER: 10 FT 2 IN; LENGTH: 37 FT 10 IN</td>
<td>D30</td>
<td></td>
<td></td>
<td>C157.1, E144.1</td>
</tr>
<tr>
<td><strong>Process 6:</strong> R219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULE</td>
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<tr>
<td>RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS</td>
<td>E38</td>
<td></td>
<td>ROG: (9) [RULE 1113, 9-6-2013; RULE 1171, 2-1-2008; RULE 1171, 5-1-2009]</td>
<td>K67.2</td>
</tr>
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(5) (5A) (5B) Denotes command and control emission limit.
(6) Denotes air toxic control rule limit.
(7) Denotes NSR applicability limit.
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.).
(9) See App B for Emission Limits.
(10) See section J for NESHAP/MACT requirements.

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.
SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988]

[Devices subject to this condition: D67, D68]

A195.9 The 2.0 PPMV NOX emission limit(s) is averaged over 60 minutes at 15 percent O2, dry basis.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(1)-Modeling, 5-10-1996; RULE 1303(b)(1)-Modeling, 12-6-2002; RULE 1703(a)(2) - PSD-BACT, 10-7-1988]

[Devices subject to this condition: D67, D68]

A195.10 The 2.0 PPMV VOC emission limit(s) is averaged over 60 minutes at 15 percent O2, dry basis.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(1)-Modeling, 5-10-1996; RULE 1303(b)(1)-Modeling, 12-6-2002]

[Devices subject to this condition: D67, D68]

A195.11 The 5 PPMV NH3 emission limit(s) is averaged over 60 minutes at 15 percent O2, dry basis. The operator shall calculate and continuously record the NH3 slip concentration using the following:.
SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

\[ \text{NH}_3 \text{ (ppmv)} = \frac{a \cdot b \cdot c}{10^6} \times 10^6 / b; \text{ where} \]

\[ a = \text{NH}_3 \text{ injection rate (lb/hr)}/17 \text{ lb/lb-mol} \]

\[ b = \text{dry exhaust gas flow rate (scf/hr)}/385.3 \text{ scf/lb-mol} \]

\[ c = \text{change in measured NOx across the SCR, (ppmvd at 15 percent O}_2) \]

The operator shall install and maintain a NOx analyzer to measure the SCR inlet NOx ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months.

The NOx analyzer shall be installed and operated within 90 days of initial start-up.

The operator shall use the above described method or another alternative method approved by the Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2012, 5-6-2005]

[Devices subject to this condition : C76, C80]

A327.1 For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[RULE 475, 10-8-1976; RULE 475, 8-7-1978]

[Devices subject to this condition : D67, D68]
ATTACHMENT 4

CPV SENTINEL PERMIT
FACILITY PERMIT TO OPERATE

CPV SENTINEL LLC
62575 POWER LINE RD
DESERT HOT SPRINGS, CA 92240

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
21865 Copley Drive, Diamond Bar, CA 91765

FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: CPV SENTINEL LLC
LEGAL OPERATOR (if different than owner):
EQUIPMENT LOCATION: 62575 POWER LINE RD DESERT HOT SPRINGS, CA 92240
MAILING ADDRESS: 55 SECOND ST STE 525 SAN FRANCISCO, CA 94105
RESPONSIBLE OFFICIAL: MARK TURNER
TITLE: PROJECT MANAGER
TELEPHONE NUMBER: (415) 293-1463
CONTACT PERSON: MARK TURNER
TITLE: PROJECT MANAGER
TELEPHONE NUMBER: (415) 293-1463
INITIAL TITLE V PERMIT ISSUED: April 15, 2011
TITLE V PERMIT EXPIRATION DATE: April 14, 2016

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<tr>
<th>TITLE V</th>
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<td>SOx: NO</td>
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<td>ZONE: INLAND</td>
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<tr>
<td>Process 1: INTERNAL COMBUSTION</td>
<td></td>
<td></td>
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<tr>
<td>System 1: GAS TURBINES, POWER GENERATION</td>
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* (1) (1A) (1B) Denotes RECLAIM emission factor  
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<tr>
<td>GAS TURBINE, CTG-1, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472139</td>
<td>D1</td>
<td>C3</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 4-20-2001]; NOX: 12.26 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 10-10-1996; RULE 1303(a)(1)]</td>
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<td>GENERATOR, 103 MW</td>
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<td>CO OXIDATION CATALYST, NO. 1, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472140</td>
<td>C3</td>
<td>D1 C4 E54 E55</td>
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<td>-BACT, 12-6-2002</td>
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<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 1, CORMETECH CHMT-2, 812 CU. FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472140</td>
<td>C4</td>
<td>C3 S6</td>
<td>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</td>
<td>A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1</td>
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<tr>
<td>AMMONIA INJECTION, GRID</td>
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<tr>
<td>STACK, NO. 1, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN A/N: 472140</td>
<td>S6</td>
<td>C4</td>
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<td>GAS TURBINE, CTG-2, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 861.7 MM BTU/Hr AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472141</td>
<td>D7</td>
<td>C9</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF (I) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PMI0: 0.01 GRAMS/SCF NATURAL GAS (5A) [RULE 475, 8-7-1981]; PMI0: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.66 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)</td>
<td>A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.3, A327.1, A433.1, B61.1, C1 1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, I296.1, K40.1, K57.1</td>
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<tr>
<td>GENERATOR, 103 MW</td>
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<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 2, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472142</td>
<td>C10</td>
<td>C9 S12</td>
<td></td>
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</tr>
<tr>
<td>AMMONIA INJECTION, GRID</td>
<td>S12</td>
<td>C10</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>STACK, NO. 2, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN A/N: 472142</td>
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<td>Permit to Construct Issued: 04/15/11</td>
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<td>GAS TURBINE, GTG 3, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472143</td>
<td>D13</td>
<td>C15</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 0.01 GRAINS/SCF NATURAL GAS (8) (40CFR 475, 8-7-1978); PM10: 0.06 LBS/MMSCF NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SO2: (8) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1) - BACT, 5-10-1996]; RULE 1303(a)(6)-BACT, 12-6-2002]</td>
<td>A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, 4-2-1982; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 4.26 861.1, 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 13 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (8) [RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/MMSCF NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SO2: (8) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMSCF NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; YOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1) - BACT, 5-10-1996]; RULE 1303(a)(6)-BACT, 12-6-2002]</td>
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<td>GENERATOR, 103 MW</td>
<td>C15</td>
<td>D13 C16</td>
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</tr>
<tr>
<td>CO OXIDATION CATALYST, NO. 3, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472145</td>
<td>Permit to Construct Issued: 04/15/11</td>
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<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO.3, CORMETECH CHMT-2. 812 CU. FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472145</td>
<td>Permit to Construct Issued: 04/15/11</td>
<td>C16</td>
<td>C15 S18</td>
<td>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)]-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002</td>
<td>A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1</td>
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<tr>
<td>AMMONIA INJECTION, GRID STACK, NO. 3, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN A/N: 472145</td>
<td>Permit to Construct Issued: 04/15/11</td>
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<td>C16</td>
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<td>D19</td>
<td>C21</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1); PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/MM HRS NATURAL GAS (3B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]</td>
<td>A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1</td>
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<tr>
<td>STACK, NO. 4, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472149</td>
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<th>ID No.</th>
<th>Connected To</th>
<th>RECLAIM Source Type/ Monitoring Unit</th>
<th>Emissions* And Requirements</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>GAS TURBINE, GTG 5, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472154</td>
<td>D25</td>
<td>C27</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPM NATURAL GAS (5) [RULE 407, 5-6-2005]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5C) [RULE 475, 10-8-1976; RULE 473, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 474, 12-4-1981; RULE 475, 10-8-1976]; SO2: (5) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPM NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)]</td>
<td>A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1</td>
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* (1) (1A) (1B) Denotes RECLAIM emission factor
(2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit
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<tbody>
<tr>
<td>GENERATOR, 103 MW</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, NO. 5, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472153</td>
<td>C27</td>
<td>D25 C28</td>
<td></td>
<td>BACT, 12-6-2002</td>
<td></td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 5, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472153</td>
<td>C28</td>
<td>B17 C27 S30</td>
<td>NH3: 5 PPMV NATURAL GAS</td>
<td>A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1</td>
<td></td>
</tr>
<tr>
<td>AMMONIA INJECTION, GRID</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STACK, NO. 5, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN A/N: 472153</td>
<td>S30</td>
<td>C28</td>
<td></td>
<td></td>
<td></td>
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<td>GAS TURBINE, GTG 6, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMHGU/MMHGU AT 72 DEGREES F, WITH WATER INJECTION WITH AN: 472154</td>
<td>D31</td>
<td>C33</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988, RULE 2005, 5-6-2005]; NOX: 12.25 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40 CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (SA) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/MMHGU NATURAL GAS (3B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40 CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMHGU NATURAL GAS (8) [40 CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</td>
<td>A63.1, A63.2, A99.1, A99.9, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, J40.1, K67.1</td>
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<tbody>
<tr>
<td>GENERATOR, 103 MW</td>
<td></td>
<td>D31 C34</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO OXIDATION CATALYST, NO. 6, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME.</td>
<td><strong>C33</strong></td>
<td>C33 S36</td>
<td>NH3: 5 PPMY NATURAL GAS (4) [RULE 1303(a)(1)] -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002</td>
<td>A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1</td>
<td></td>
</tr>
<tr>
<td>SELECTIVE CATALYTIC REDUCTION, NO. 6, CORMETECH CHMT-2, 812 CU FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH</td>
<td><strong>C34</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AMMONIA INJECTION, GRID</td>
<td>S36</td>
<td>C34</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STACK, NO.6, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
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<tbody>
<tr>
<td>GAS TURBINE, GTG 7, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472156</td>
<td>D37</td>
<td>C39</td>
<td>NOX: MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 12.26 LBS/MMSCF NATURAL GAS (I) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997], SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</td>
<td>A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, B61.2, B61.3, B61.6, B12.1, B29.1, B29.2, B29.3, B82.1, B82.2, E193.1, E23.1, E26.1, K40.1, K67.1</td>
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<tr>
<td>GENERATOR, 103 MW</td>
<td>C39</td>
<td>D37 D40</td>
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<tr>
<td>A/N: 472157</td>
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<tr>
<td>Permit to Construct Issued: 04/15/11</td>
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</tr>
<tr>
<td>SELECTIVE CATALYTIC REVERSION, NO. 7, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT</td>
<td>C40</td>
<td>C39 S42</td>
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<tr>
<td>2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH</td>
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<tr>
<td>A/N: 472158</td>
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<tr>
<td>Permit to Construct Issued: 04/15/11</td>
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<tr>
<td>AMMONIA INJECTION, GRID</td>
<td></td>
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<td>GAS TURBINE, GTG8, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472158</td>
<td>D43</td>
<td>C45</td>
<td>NOX MAJOR SOURCE**</td>
<td>CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF NATURAL GAS (1A) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAMS/SCF NATURAL GAS (5A) [RULE 475, 8-7-1977; RULE 475, 8-7-1977]; PM10: 0.1 GRAMS/SCF NATURAL GAS (5) [RULE 469, 8-7-1981]; PM10: 11 LBS/MMHR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1977]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)]</td>
<td>A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, H23.1, I296.1, K40.1, K67.1</td>
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<td>PROCESS 1: INTERNAL COMBUSTION</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>CO OXIDATION CATALYST, NO. 8, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME.</td>
<td>C45</td>
<td>D43 C46</td>
<td></td>
<td>-BACT, 12-6-2002</td>
<td></td>
</tr>
<tr>
<td>SELEcTIVE CATALYTIC REDUCTION, NO. 8, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH</td>
<td>C46</td>
<td>C45 S48</td>
<td>NH3: 5 PPM NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AMMONIA INJECTION, GRID</td>
<td>S48</td>
<td>C46</td>
<td></td>
<td>A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1</td>
<td></td>
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<td>STACK, NO. 8, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN</td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>INTERNAL COMBUSTION ENGINE, EMERGENCY FIRE, DIESEL FUEL, CLARKE, MODEL JU6H-UFADT0, DRIVING AN FIRE PUMP, WITH AFTERCOOLER, TURBOCHARGER, 274 HP</td>
<td>D49</td>
<td>NOX: PROCESS UNIT**</td>
<td>CO: 2.6 GRAM/BHP-HR DIESEL (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 134 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; NOX + ROG: 3 GRAM/BHP-HR DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) - BACT, 12-6-2002; RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; PM10: 0.15 GRAM/BHP-HR DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) - BACT, 12-6-2002]; SOX: 0.005 GRAM/BHP-HR DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) - BACT, 12-6-2002]</td>
<td>B51.2, C1.4, C1.7, D12.5, I296.3, K67.3</td>
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</table>

| **Process 2: INORGANIC CHEMICAL STORAGE** | | | | | |
| STORAGE TANK, TK-1, 29.4% AQUEOUS AMMONIA, WITH PRV SET AT 25 PSIG, 12000 GALS; DIAMETER: 9 FT 4 IN; HEIGHT: 12 FT | D52 | | | C157.1, E144.1, E193.1, K67.2 |

* (1) (1A) (1B) Denotes RECLAIM emission factor
  (2) (2A) (2B) Denotes RECLAIM emission rate
  (3) Denotes RECLAIM concentration limit
  (4) Denotes BACT emission limit
  (5) (5A) (5B) Denotes command and control emission limit
  (6) Denotes air toxic control rule limit
  (7) Denotes NSR applicability limit
  (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
  (9) See App B for Emission Limits
  (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.
SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

<table>
<thead>
<tr>
<th>Equipment ID Connected</th>
<th>RECLAIM Source Type/ Monitoring Unit</th>
<th>Emissions And Requirements</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>No.</td>
<td>To</td>
<td></td>
<td></td>
</tr>
<tr>
<td>STORAGE TANK, TK-2, 29.4% AQUEOUS AMMONIA, WITH PRV SET AT 25 PSIG, 12000 GALS; DIAMETER: 9 FT 4 IN; HEIGHT: 12 FT</td>
<td>D53</td>
<td></td>
<td>C157.1, E144.1, E193.1, K67.2</td>
</tr>
<tr>
<td>A/N: 472162</td>
<td>Permit to Construct Issued: 04/15/11</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits

(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.
SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A195.4 **The 5 PPMV NH₃ emission limit(s)** is averaged over 60 minutes at 15% O₂, dry basis. The operator shall calculate and continuously record the NH₃ slip concentration using the following.

\[
\text{NH}_3 (\text{ppmv}) = \left[ \frac{a - b \times c}{1E+06} \right] \times 1E+06 / b; \text{ where}
\]

\[a = \text{NH}_3 \text{ injection rate (lbs/hr)/17(lb/lb-mol)}\]

\[b = \text{dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol}\]

\[c = \text{change in measured NOx across the SCR (ppmvd at 15% O₂)}\]

The operator shall install and maintain a NOx analyzer to measure the SCR inlet NOx ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months.

The NOx analyzer shall be installed and operated within 90 days of initial start-up.

The operator shall use the above described method or another alternative method approved by the Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: C4, C10, C16, C22, C28, C34, C40, C46]

A327.1 For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[RULE 475, 10-8-1976; RULE 475, 8-7-1978]

[Devices subject to this condition: D1, D7, D13, D19, D25, D31, D37, D43]
Attachment 3
Minor Title V Permit Change Request (Resubmittal)
(September 28, 2017)
September 28, 2017

Christian Aviles
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: **Walnut Creek Energy Park - Facility ID 146536 RECLAIM/Title V Facility Permit**

Dear Mr. Aviles,

Walnut Creek Energy, LLC (WCE) submitted the attached letters to the SCAQMD requesting minor changes to conditions in the RECLAIM/Title V permit on January 19, 2016 and June 28, 2016. We requested the following changes:

- Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Section H, Permit Condition D12.6 for Device Number D34);

- Clarification that the inlet temperature requirements for the Selective Catalytic Reduction (SCR) do not apply during startup and shutdown periods (Section H, Permit Condition D12.3 for Device Numbers C4, C10, C16, C22 and C28);

- Clarification that the operating load of 100 percent for PM$_{10}$ emission tests also applies to PM$_{2.5}$ emission tests (Section H, Permit Condition D29.1 for Device Numbers D1, D7, D13, D19 and D25);

- The addition of some applicable conditions from 40 CFR 60, Subpart IIII for the emergency fire pump engine (Device Number D34); and

- A change to the ammonia emission (i.e., "slip") limit from 5.0 ppmv to 5 ppmv (Section H, Permit Condition A195.4 for Device Numbers C4, C10, C16, C22 and C28)

In July 2017 we received a renewal to the RECLAIM/Title V permit dated July 6, 2017 that did not include the requested changes. In addition to the above referenced changes, we believe there are conditions in the July 6, 2017 RECLAIM/Title V permit that are missing device numbers and therefore, we are also asking for the following corrections:
• Addition of Device Number C4 to Section H, Permit Condition A195.4 (NH3 “slip” emission limit(s), calculation and monitoring requirements). Condition A195.4 currently references Device Numbers C10, C16, C22 and C28 (SCRs).

• Addition of Device Number C16 to Section H, Permit Condition D12.2 (NH3 flow meter requirements). Condition D12.2 currently references Device Numbers C4, C10, C22 and C28 (SCRs).

We intend to submit to the California Energy Commission (CEC) a copy of this request and file a minor Petition to Amend to modify Air Quality conditions AQ-4 and AQ-7. Proposed amendments to AQ-4 will correct the ammonia emission limit to 5 ppm and proposed amendments to AQ-7 will to clarify that this condition will also address PM$_{2.5}$ source test requirements and ensure consistency of the respective conditions in the Title V and the CEC license. If you have any questions or need further information, please don’t hesitate to contact me at (626) 986-0370.

Sincerely,

Rick McPherson
Plant Manager

Attachments

WCEP O&M File: 3.3.2.2

cc: Andrew Lee, SCAQMD
    Dale Rundquist, CEC
    CEC Dockets (05-AFC-2C)
    George Plautka, NRG Energy, Inc.
    Heather MacLeod, NRG Energy, Inc.
PETITION TO AMEND FOR:
WALNUT CREEK ENERGY PARK

Docket No. 05-AFC-2C

ENERGY COMMISSION STAFF’S SUGGESTED ERRATUM FOR STAFF ANALYSIS FOR PROPOSED REVISIONS TO CONDITIONS OF CERTIFICATION, INCLUDING AIR QUALITY AND WORKER SAFETY

Staff recommends a minor correction to Condition of Certification AQ-8 in the Air Quality section of the Staff Analysis of Proposed Revisions to Conditions of Certification, including Air Quality and Worker Safety for the Walnut Creek Energy Park. Staff recommends changing the timing for submittal of the source test results to “no later than 45 days after the source test was conducted,” instead of the 60 days originally provided. This change aligns the timing in the condition of certification with the timing provided in the verification section. This change does not affect any of staff’s conclusions regarding the air quality impacts and LORS compliance.

The change also makes the timing consistent with other conditions in the decision. While the South Coast Air Quality Management District (SCAQMD) Title V permit dated July 27, 2018, still has “60 days after the source test” for this condition, the district intends to incorporate this change in their next Title V permit update.

The recommended change is:

AQ-8 The project owner shall provide to the District a source test report in accordance with the following specifications:

Source test results shall be submitted to the District and the CPM no later than 45 days after the source test was conducted.

Emission data shall be expressed in terms of concentration (PPMV) corrected to 15 percent oxygen (dry basis), mass rate (lbs/hr), and lbs/MM Cubic Feet. In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

All exhaust flow rate shall be expresses in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM).
All moisture concentrations shall be expressed in terms of percent corrected to 15 percent oxygen.

Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (CFH), the flue gas temperature, and the generator power output (MW) under which the test was conducted.

**Verification:** The project owner shall submit source test results no later than 45 days following the source test date to both the District and CPM.
ORDER NO:

STATE OF CALIFORNIA

STATE ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of:  Docket No. 05-AFC-2C

Walnut Creek Energy Park

[Proposed] Order Approving Petition To Amend Facility License

I. INTRODUCTION

Walnut Creek Energy, LLC (WCE), the owner and operator of the Walnut Creek Energy Park (WCEP), located in the City of Industry, Los Angeles County, has submitted a petition to amend the WCEP Energy Commission Decision in order to revise AQ-4 to modify the ammonia emission limit, AQ-7 to clarify language pertaining to particulates, and to modify Worker Safety-5 to remove outdated language related to training security guards in the use of emergency equipment.

On November 9, 2018, staff published an analysis of the petition and recommended approval of the requested changes to AQ-7 and Worker Safety-5, but rejection of the changes proposed to AQ-4. Staff also proposed modifications to a number of other conditions to maintain consistency with SCAQMD’s revised Title V permit for the project. The proposed change to AQ-4, changing the ammonia emission limit from 5.0 parts per million (ppm) to 5 ppm, would reduce the precision of the emission limit and potentially allow an increase of 0.5 ppm. Staff concludes that such a change is not warranted; the request has also been rejected by SCAQMD.

Staff concludes that the changes to AQ-7, Worker Safety-5, and the various changes to Air Quality conditions of certification proposed by staff will not have a significant effect on the environment and will ensure the project continues to comply with all applicable laws, ordinances, regulations, and standards.

II. FINDINGS

Based on the entire record, including staff’s analysis, the Energy Commission concurs with staff’s recommendations and finds that the proposed changes will not result in any
significant adverse impacts to the environment, including public health and safety. Additionally, the Energy Commission finds that:

- The petition meets all the filing criteria of Title 20, section 1769 (a), of the California Code of Regulations concerning post-certification project modifications;
- The project will remain in compliance with all applicable laws, ordinances, regulations, and standards, subject to the provisions of Public Resources Code, section 25525;
- The changes will be beneficial to the public and applicant because it would align license conditions with the project’s Title V permit and would eliminate a condition of certification that is no longer applicable due to a change in the project; and
- There has been a substantial change in circumstances since the Energy Commission certification justifying the proposed changes, in that the project’s Title V air quality permit has been updated by the South Coast Air Quality Management District and the project owner has requested other changes to the license.

III. CONCLUSION AND ORDER

The California Energy Commission hereby adopts staff’s recommendations and approves the changes to the Commission Final Decision for the Walnut Creek Energy Park as specified in the Staff Analysis of Proposed Revisions to Conditions of Certification, including Air Quality and Worker Safety.

IT IS SO ORDERED.

CERTIFICATION

The undersigned Secretariat to the Commission does hereby certify that the foregoing is a full, true, and correct copy of an Order duly and regularly adopted at a meeting of the California Energy Commission held on December 10, 2018.

AYE: 
NAY: 
ABSENT: 
ABSTAIN:

Cody Goldthrite
Secretariat