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5  
6 BEFORE THE HEARING BOARD OF THE  
7 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

8 **In the Matter of**

9 SENTINEL ENERGY CENTER LLC  
10 [Facility ID No. 152707],

11 Petitioner,

12 v.

13 SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT.

14 Respondent.  
15

Case No. 6141-3

**DECLARATION OF DENNIS JOHNSON  
RE INTERIM AND SHORT VARIANCE  
PETITION; FILED IN SUPPORT OF  
CONSENT CALENDAR**

Hearing Date: October 2, 2024  
Time: 9:30 a.m.  
Place: South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

16 I, Dennis Johnson, declare:

17 1. I am the Plant Manager for the Sentinel Energy Center (“Sentinel” or “Facility”). If  
18 called as a witness, I could testify to the following based on personal knowledge.

19 2. I am familiar with and have reviewed the petition filed in Case no 6141-3, and I am  
20 familiar with the issues presented in the petition related to the CEMS requirements of the  
21 Facility’s permit, including Permit Condition D82.1 on Facility Permit No. 152707 (Revision no.  
22 7) (the revised “Title V Permit”).

23 3. For the past 7 years I have served as the Plant Manager of Sentinel, an 850 MW gas  
24 fired power plant powered by eight GE LMS100 simple cycle gas turbines (Devices D1, D7, D13,  
25 D19, D25, D31, D37, D43). Sentinel is scheduled to be in outage to complete required  
26 construction for installation of black start equipment, including a battery storage system. During  
27 the outage the eight turbines and eight CEMS will be powered down and locked out from all  
28 power sources for an extended period.

1           4.     During their respective shutdown periods, the CEMS monitoring equipment and  
2 communications capability will be unavailable. Units 1-4 (Devices D1, D7, D13, D19) will be  
3 non-operational-and entirely powered down, including the CEMS monitoring equipment that will  
4 be unavailable from October 1-11, 2024. It is expected that Units 1-4 will be re-energized and  
5 CEMS monitoring equipment and communication will be restored on or before October 12, 2024.  
6 Units 5-8 (Devices D25, D31, D37, D43) will-be non-operational and entirely powered down,  
7 including the CEMS monitoring equipment that will be-unavailable from October 9-16, 2024. It is  
8 expected that Units 5-8 will be powered back on and CEMS-monitoring equipment and  
9 communication will be restored on or before October 17, 2024.

10           5.     Because of the outage and required construction, the facility cannot provide power to  
11 the CEMS equipment for Units 1-8 (Devices D1, D7, D13, D19, D25, D31, D37, D43) during the  
12 period of October 1-16, 2024 to comply with the CO CEMS monitoring requirements as required  
13 by Rule 218.

14           6.     The team at Sentinel, including myself, have worked diligently to determine the  
15 appropriate course of action in light of these facts. Sentinel had an initial conference call with  
16 consultants on August 27, 2024, to discuss the construction timing and the possibility of  
17 maintaining power to the CEMS using generators; however, upon further investigation and as the  
18 scope of work changed, Sentinel deemed it was not feasible to maintain power to the CEMS  
19 because of the life-threatening danger to the construction staff since the electrical equipment  
20 would be powered on during modifications with exposed wiring causing an extremely hazardous  
21 environment.

22           7.     In reviewing the SCAQMD rules, Sentinel determined that the facility would be able to  
23 comply with the provisions of Rule 2012(c)(2)(D-E) which contains provisions that allows the  
24 CEMS to not be subject to the-monitoring requirements for NOx, and for NOx emissions to be  
25 considered valid zeros, when the source does not operate for a minimum of 168 consecutive  
26 hours; however, no such provisions exist in Rule 218 (amended March 5, 2021). Beginning on  
27 September 4, 2024 and through September 13, Sentinel consulted with John Jones, District legal  
28 counsel, to discuss if provisions contained in Rule 218.2(e)(3) could apply in this case; however,

1 our understanding is that the CEMS at Sentinel is not subject to Rule 218.2 at this time nor is  
2 currently certified to comply with the provisions of Rule 218.2.

3 8. Because Units 1-8 will be in outage during this period, there will be no excess  
4 emissions and there is no risk to the environment if the CO CEMS is not in operation. Sentinel  
5 will provide fuel records and documentation of fuel line lock-out/tag-out (LOTO), which locks the  
6 fuel supply valve, to the District to confirm zero gas usage during the variance period,  
7 demonstrating that Units 1-4 will not be operational from October 1-11, 2024, and Units 5-8 will  
8 not be operational from October 9-16, 2024.

9 I declare under penalty of perjury under the laws of the State of California that the  
10 foregoing is true and correct. Executed this 25th day of September 2024 at Palm Springs,  
11 California.

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15 DENNIS JOHNSON  
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