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BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**In the Matter of**

WALNUT CREEK ENERGY LLC  
[Facility ID No. 146536],

Petitioner,

v.

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT.

Respondent.

Case No. 6230-2

**DECLARATION OF CHRIS PERRI RE  
REGULAR VARIANCE PETITION;  
FILED IN SUPPORT OF CONSENT  
CALENDAR**

Hearing Date: May 21, 2024  
Time: 9:30 a.m.  
Place: South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

**DECLARATION OF CHRIS PERRI**

I, Chris Perri, declare:

1. I am an AQ Engineer II working in the Engineering and Permitting Division (E&P) of the South Coast Air Quality Management District (South Coast AQMD or District). Unless otherwise stated expressly below, I make this declaration based on personal knowledge and, if called as a witness in this action, could and would testify competently to the matters discussed herein.

2. I have worked for the District for over 33 years, and I work with permit applicants and prepare engineering evaluations to support draft permits and final permitting decisions for power plants, hospitals, schools and universities. Prior to my current position, I was an AQ Engineer in refinery permitting. Earlier in my career, I briefly worked in the Planning and Rule

1 Division of South Coast AQMD. I hold a B.S. in Civil Engineering from California State  
2 Polytechnic University.

3 3. I am familiar with and have reviewed Walnut Creek Energy, LLC's (Petitioner)  
4 petition filed in Case no 6230-2, and I am familiar with the issues presented in the petition related  
5 to the start-up nitrogen oxides (NOx) mass emission requirements of the Facility's permit,  
6 including Permit Condition A195.7 on Facility Permit No. 146536 [Revision no. 9] (the revised  
7 Title V Permit).

8 4. I am also familiar with the permit to construct which was issued January 31, 2024,  
9 which allowed an increase in heat input and gross power output of the turbines, reduced the NOx  
10 permit limit from 2.5 ppm to 2.3 ppm, and authorized the replacement of the selective catalytic  
11 reduction (SCR) catalysts.

12 5. As part of that permit review, mass emissions limits were added to the permit  
13 which apply during a turbine start-up. I was directly involved in communications in the processing  
14 of Petitioner's applications, and I am accordingly aware of the circumstances surrounding the  
15 start-up emissions limits. The limits that were added to the permit to construct issued January 31,  
16 2024, are based on information contained in the initial permit evaluation performed by South  
17 Coast AQMD engineering staff for this equipment in 2011. Although a mass emission start-up  
18 limit was not included in the original permit for this equipment, restricting mass emissions during  
19 a start-up is common practice in power plant permitting. The limit that was imposed is 7.0 lbs  
20 NOx per 35-minute start-up.

21 6. On December 20, 2023, Petitioner was given the opportunity to review the draft  
22 permit conditions, including the proposed start-up limit, prior to the permit to construct being  
23 issued. Petitioner did not object to the NOx start-up limit itself; however, Petitioner requested that  
24 the limit be set at 10.42 lbs NOx based on a 60-minute period which includes a start-up.  
25 Petitioner's request to change the limit was not accepted, and the permit was issued with the limit  
26 of 7.0 lbs NOx per 35-minute start-up.

27 7. Condition A195.7 contains the limit of 7.0 lbs NOx per 35-minute start-up and it  
28 applies to Gas Turbine Units 1-5 (Devices D1, D7, D13, D19, D25).

1           8.       Attached as Exhibit A is a true and correct copy of pages Section H of the permit  
2 dated January 31, 2024. Pages 18 through 20 have the terms of Condition A195.7.

3           9.       It is possible that the information on which the NOx start-up limit is based, i.e. 7.0  
4 lbs/start from the original permit to construct evaluation in 2011, is an underestimation since  
5 similar turbines permitted in the basin have limits which are higher. As such South Coast AQMD  
6 is open to re-evaluating the validity of the limit in a follow-up application to be submitted by the  
7 Petitioner within 60 days of the granting of this variance. Petitioner will submit the application  
8 with a request for an expedited review. I expect the review can be completed by the end of this  
9 year.

10          10.       In order to evaluate whether the NOx start-up limit of 7.0 lbs/start should be  
11 adjusted, as part of this variance, staff is requesting that Petitioner provide data on the turbines  
12 NOx emissions and operating parameters during upcoming start-ups as well as for past start-up  
13 events. This will provide South Coast AQMD engineering staff with a basis for developing a  
14 revised start-up limit if necessary, during the evaluation of the applications to be submitted by the  
15 petitioner.

16          11.       The estimated excess emissions from granting a variance from the 7.0 lbs NOx  
17 start-up limit is potentially up to 20 lbs NOx per start-up. The permit allows up to 2 start-ups per  
18 day, and 40 start-ups per month per turbine. From these parameters, a worst-case assumption for  
19 excess emissions could be as high as 40 lbs NOx per day per turbine, or 200 lbs NOx per day for 5  
20 turbines, and 4,000 lbs NOx per month for 5 turbines. The petitioner will monitor the excess  
21 emissions with the use of the continuous emissions monitoring systems (CEMS).

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# EXHIBIT A

## 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.

Wayne Nastri  
Executive Officer

By Shannon Lee for  
Jason Aspell  
Deputy Executive Officer  
Engineering and Permitting

# FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

## TABLE OF CONTENTS

Section	Description	Revision #	Date Issued
A	Facility Information	4	08/02/2022
B	RECLAIM Annual Emission Allocation	17	01/01/2024
C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	6	10/28/2022
E	Administrative Conditions	3	08/02/2022
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G	Recordkeeping and Reporting Requirements for RECLAIM Sources	3	08/02/2022
H	Permit To Construct and Temporary Permit to Operate	9	01/31/2024
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J	Air Toxics	3	08/02/2022
K	Title V Administration	3	08/02/2022
Appendix			
A	NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	3	08/02/2022
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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:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
<b>System 1: GAS TURBINES, POWER GENERATION</b>					

\* (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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<b>Process 1: INTERNAL COMBUSTION</b>					
GAS TURBINE, UNIT NO.1, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647716 Permit to Construct Issued: 01/31/24	D1	C4	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	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: 2.3 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 6-3-2011; RULE 2005, 11-5-2021]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [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]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.1, I298.7, K67.5

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.1, BASF CAMEL, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647166 Permit to Construct Issued: 01/31/24	C3				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 1, CORMETECH CMHCDT, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647166 Permit to Construct Issued: 01/31/24	C4	D1		<b>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</b>	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID STACK, NO.1, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647716 Permit to Construct Issued: 01/31/24	S6				

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
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The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
GAS TURBINE, UNIT NO.2, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647717 Permit to Construct Issued: 01/31/24	D7		NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	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: 2.3 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]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [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]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.2, I298.8, K67.5

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.2, BASF CAMEL, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647167 Permit to Construct Issued: 01/31/24	C9				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 2, CORMETECH CMHCDET, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647167 Permit to Construct Issued: 01/31/24	C10			<b>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</b>	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID STACK, NO.2, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647717 Permit to Construct Issued: 01/31/24	S12				

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
GAS TURBINE, UNIT NO.3, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647718 Permit to Construct Issued: 01/31/24	D13		NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	<b>CO:</b> 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; <b>CO:</b> 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; <b>NOX:</b> 2.3 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; <b>NOX:</b> 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; <b>PM10:</b> 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; <b>PM10:</b> 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; <b>PM10:</b> 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; <b>SO2:</b> (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; <b>SOX:</b> 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; <b>SOX:</b> 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; <b>VOC:</b> 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.3, I298.9, K67.5

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 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements  
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GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.3, BASF CAMEL, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647168 Permit to Construct Issued: 01/31/24	C15				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 3, CORMETECH CMHCDET, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647168 Permit to Construct Issued: 01/31/24	C16			<b>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</b>	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID					
STACK, NO.3, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647718 Permit to Construct Issued: 01/31/24	S18				

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
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GAS TURBINE, UNIT NO.4, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647719 Permit to Construct Issued: 01/31/24	D19		NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	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: 2.3 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]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [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]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.4, I298.10, K67.5

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.4, BASF CAMEL, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647169 Permit to Construct Issued: 01/31/24	C21				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 4, CORMETECH CMHCDET, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647169 Permit to Construct Issued: 01/31/24	C22			<b>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</b>	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID					
STACK, NO.4, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647719 Permit to Construct Issued: 01/31/24	S24				

\* (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.



## 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:**

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
GAS TURBINE, UNIT NO.5, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647720 Permit to Construct Issued: 01/31/24	D25		NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	<b>CO:</b> 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; <b>CO:</b> 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; <b>NOX:</b> 2.3 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; <b>NOX:</b> 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; <b>PM10:</b> 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; <b>PM10:</b> 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; <b>PM10:</b> 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; <b>SO2:</b> (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; <b>SOX:</b> 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; <b>SOX:</b> 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; <b>VOC:</b> 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.5, I298.11, K67.5

\* (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.

## 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:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION</b>					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.5, BASF CAMEL, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647170 Permit to Construct Issued: 01/31/24	C27				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 5, CORMETECH CMHCDET, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647170 Permit to Construct Issued: 01/31/24	C28			<b>NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]</b>	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID STACK, NO.5, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647720 Permit to Construct Issued: 01/31/24	S30				

\* (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.

# **FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC**

## **SECTION H: DEVICE ID INDEX**

**The following sub-section provides an index  
to the devices that make up the facility  
description sorted by device ID.**

# FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

## SECTION H: DEVICE ID INDEX

<b>Device Index For Section H</b>			
<b>Device ID</b>	<b>Section H Page No.</b>	<b>Process</b>	<b>System</b>
D1	3	1	1
C3	3	1	1
C4	3	1	1
S6	3	1	1
D7	5	1	1
C9	5	1	1
C10	5	1	1
S12	5	1	1
D13	7	1	1
C15	7	1	1
C16	7	1	1
S18	7	1	1
D19	9	1	1
C21	9	1	1
C22	9	1	1
S24	9	1	1
D25	11	1	1
C27	11	1	1
C28	11	1	1
S30	11	1	1

## 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:**

#### FACILITY CONDITIONS

F2.1 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
PM2.5	Less than 60.89 TONS IN ANY ONE YEAR
CO	Less than or equal to 112.96 TONS IN ANY ONE YEAR

The operator shall calculate the monthly emissions of PM2.5 using the equation below and an emissions factor of 7.07 lbs/mm scf

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 operator 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 a factor of 13.76 lbs/mm scf

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

**[40CFR 51 Subpart S, 3-8-2007]**

## **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:**

- F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
- (a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
  - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

**[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]**

- F67.1 The facility operator shall comply with all terms and conditions specified below:

Continuous operation of monitoring systems not subject to a specific regulation or rule with provisions for monitor outages is not required when necessary calibration, maintenance or repair activities are performed in accordance with manufacturer's recommendation. The operator shall take all reasonable actions to minimize the time required to perform such activities. In no event shall any such activities exceed 96 consecutive hours for any one calibration, maintenance, or repair episode.

The operator shall notify the Executive Officer within 24 hours of the start of a calibration, maintenance, or repair activity, if the activity is expected to last more than 24 consecutive hours.

**[RULE 204, 10-8-1993]**

### **DEVICE CONDITIONS**

#### **A. Emission Limits**

- A63.1 The operator shall limit emissions from this equipment as follows:

## 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:**

CONTAMINANT	EMISSIONS LIMIT
PM10	Less than or equal to 2,592 LBS IN ANY ONE MONTH
VOC	Less than or equal to 1035 LBS IN ANY ONE MONTH

The operator shall calculate the monthly emissions for PM10 and VOC using the equation below and the following emission factors: VOC: 2.82 lb/mmcf; and PM10: 7.07 lb/mmcf

$$\text{Monthly Emissions, lb/month} = (Q) \times (EF),$$

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

For the purposes of this condition, the limits shall based on the emissions from a single turbine.

**[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 1313(g), 12-7-1995]**

[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:.

## 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:**

$NH_3$  (ppmv) =  $[a-b*c/1EE+06]*1EE+06/b$ ; where

a =  $NH_3$  injection rate (lb/hr)/17 lb-lb-mol

b = dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol

c = change in measured  $NO_x$  across the SCR (ppmvd at 15%  $O_2$ )

The operator 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 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.

The SCAQMD may require the installation of a CEMS designed to monitor ammonia concentration if the SCAQMD determines that a commercially available CEMS has been proven to be accurate and reliable and that an adequate Quality Assurance/Quality Control (QA/QC) protocol has been established. The SCAQMD or other agency must establish an SCAQMD approved QA/QC protocol prior to the ammonia CEMS becoming a requirement..

In the event that an ammonia CEMS is installed, the ammonia slip calculation and annual ammonia slip testing requirement shall no longer be required..

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2012, 2-5-2016]**

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

A195.6 The 15 PPMV  $NO_x$  emission limit(s) is averaged over over 4 hours rolling at 15 percent  $O_2$ , dry..

**[40CFR 63 Subpart KKKK, 4-20-2006]**



## **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:**

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

A195.7 The 2.3 PPMV NOX emission limit(s) is averaged over 60 minutes at 15 percent O<sub>2</sub>, dry.

## **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:**

The limit shall not apply during start up, shutdown periods, and the recommissioning.

Start up time shall not exceed 35 minutes. Shutdown time shall not exceed 10 minutes. The turbine is limited to a maximum of 2 start ups per day and 40 start ups per month. Written records of starts ups and shutdowns shall be maintained and made available upon request from the Executive Officer..

NOx emissions during start up shall not exceed 7.0 lbs, and NOx emissions during a shutdown shall not exceed 4.3 lbs. These limits shall take effect 90 days after the completion of recommissioning for each unit.

For the purposes of this condition, the beginning of start-up occurs at initial fire in the combustor and the end of start-up occurs when both the NOx and CO BACT levels are achieved. If during start-up the process is aborted and the turbine is restarted, then the start-up and restart will count as one start-up, provided the total time for the start-up does not exceed 35 minutes..

Recommissioning is a one time event that shall not exceed 13 operating hours per turbine. Once started, the recommissioning shall be completed within 14 operating days per turbine, and all turbines shall be recommissioned within 60 days of the installation of the replacement SCR. The operator shall notify South Coast AQMD prior to the start of the recommissioning operation and at the conclusion of the recommissioning operation for each unit..

Operation of the equipment prior to completion of the recommissioning shall be in accordance with Section D of the permit, including limiting the maximum heat input rate for each turbine to 891.7 mmbtu/hr..

The NOx emissions during recommissioning shall not exceed 10.2 lbs/hr and 132.6 total lbs as determined through the use of the certified CEMS. The operator shall keep records of the date and time the turbine is operated during recommissioning, the duration of the operation, the fuel use and the NOx and CO emissions..

The operator shall keep records of the date, time and duration as well as minute by

## **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:**

minute data (NO<sub>x</sub>, CO and O<sub>2</sub> concentration and fuel flow rate at a minimum) of each startup and shutdown, and during the recommissioning operation..

**[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]**

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

A195.8 The 4.0 PPMV CO emission limit(s) is averaged over 60 minutes at 15 percent O<sub>2</sub>, dry.

## **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:**

The limit shall not apply during start up, shutdown periods, and the recommissioning..

Start up time shall not exceed 35 minutes. Shutdown time shall not exceed 10 minutes. The turbine is limited to a maximum of 2 start ups per day and 40 start ups per month. Written records of starts ups and shutdowns shall be maintained and made available upon request from the Executive Officer..

CO emissions during a start up shall not exceed 15.4 lbs, and CO emissions during a shutdown shall not exceed 18.2 lbs. These limits shall take effect 90 days after the completion of recommissioning for each unit..

For the purposes of this condition, the beginning of start-up occurs at initial fire in the combustor and the end of start-up occurs when both the NO<sub>x</sub> and CO BACT levels are achieved. If during start-up the process is aborted and the turbine is restarted, then the start-up and restart will count as one start-up, provided the total time for the start-up does not exceed 35 minutes..

Recommissioning is a one time event that shall not exceed 13 operating hours per turbine. Once started, the recommissioning shall be completed within 14 operating days per turbine, and all turbines shall be recommissioned within 60 days of the installation of the replacement SCR. The operator shall notify South Coast AQMD prior to the start of the recommissioning operation and at the conclusion of the recommissioning operation for each unit..

Operation of the equipment prior to completion of the recommissioning, shall be in accordance with Section D of the permit including limiting the maximum heat input rate for each turbine to 891.7 mmbtu/hr..

The CO emissions during recommissioning shall not exceed 8.0 lbs/hr and 104 total lbs as determined through the use of the certified CEMS. The operator shall keep records of the date and time the turbine is operated during recommissioning, the duration of the operation, the fuel use and the NO<sub>x</sub> and CO emissions..

The operator shall keep records of the date, time and duration as well as minute by minute data (NO<sub>x</sub>, CO and O<sub>2</sub> concentration and fuel flow rate at a minimum) of

## 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:**

each startup and shutdown, and during the recommissioning operation..

**[RULE 1703 - PSD Analysis, 10-7-1988]**

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

A195.9 The 2.0 PPMV VOC emission limit(s) is averaged over 60 minutes at 15 percent O<sub>2</sub>, dry..

The limit shall not apply during start up and shutdown periods..

Start up time shall not exceed 35 minutes. Shutdown time shall not exceed 10 minutes. The turbine shall be limited to a maximum of 2 start ups per day and 40 start ups per month. Written records of starts ups and shutdowns shall be maintained and made available upon request from the Executive Officer..

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

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

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]

#### **B. Material/Fuel Type Limits**

B61.1 The operator shall only use natural gas containing the following specified compounds:

Compound	Limit	grain per 100 scf
<hr/>		

## 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:

total sulfur | less than or equal to | 0.25  
compounds  
calculated as  
H<sub>2</sub>S

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

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

#### C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the fuel usage to no more than 367 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 maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

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

C1.5 The operator shall limit the fuel usage to no more than 20.7 MM cubic feet per day.

For the purpose of this condition, fuel usage shall be defined as the total natural gas usage of a single turbine. Alternatively, the operator shall limit the heat input to each turbine to 21,735 mmbtu per day calculated by using the fuel use data multiplied by a fuel heat content of 1050 btu/cf..

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[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]

## 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:**

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

#### **D. Monitoring/Testing Requirements**

- D12.1 The operator shall install and maintain a(n) flow meter to accurately indicate the fuel usage being supplied to the turbine.

The operator shall also install and maintain a device to continuously record the parameter being measured.

**[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 2012, 2-5-2016; 40CFR Part 75-Acid Rain CEM, 1-18-2012]**

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

- 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.

The operator shall continuously monitor the temperature. The operator shall also install and maintain a device to continuously record the exhaust temperature. Continuously record shall be defined as recording at least once every hour and shall be calculated based upon the 60 minute rolling average of the continuous monitoring for that hour. The temperature gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months

The catalyst temperature range shall remain between 715 degrees F and 840 degrees F, except during start-up and shutdown periods

**[RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]**

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

- D12.4 The operator shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the SCR catalyst bed in inches of water column.

## 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:

The operator shall continuously monitor the differential pressure. The operator shall also install and maintain a device to continuously record the differential pressure. Continuous recording shall be defined as recording at least once every month and shall be calculated based upon the average of the continuous monitoring for that month. The pressure 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.

[**RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015; RULE 2005, 11-5-2021**]

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

- D12.7 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the the total hourly throughput of injected ammonia.

The operator shall continuously monitor the ammonia flow rate. The operator shall also install and maintain a device to continuously record the ammonia flow rate. Continuously record shall be defined as recording at least once every hour and shall be calculated based upon the 60 minute rolling average of the continuous monitoring for that hour. The flow meter shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The injected aqueous ammonia rate shall not exceed 265 lbs/hr.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1703 - PSD Analysis, 10-7-1988; RULE 2005, 12-4-2015; RULE 2005, 11-5-2021**]

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

- D12.8 The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the exhaust at the inlet to the oxidation catalyst.



## 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:**

The operator shall continuously monitor the temperature. The operator shall also install and maintain a device to continuously record the exhaust temperature. Continuously record shall be defined as recording at least once every hour and shall be calculated based upon the 60 minute rolling average of the continuous monitoring for that hour. The temperature gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The exhaust temp shall remain above 480 degrees F, except during start-up and shutdown periods.

This condition shall become effective no later than 180 days after the completion of recommissioning for each turbine.

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

[Devices subject to this condition : C3, C9, C15, C21, C27]

D29.2 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
NH3 emissions	District method 207.1	1 hour	Outlet of the SCR serving this equipment

## 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:**

The South Coast AQMD shall be notified of the date and time of the test at least 7 days prior to the test

The test shall be conducted to determine compliance with the Rule 1303 BACT concentration limit.

The test shall be conducted when this equipment is operating at as close to 100 percent load as possible but not less than 90%.

The test shall be performed at least annually, except as follows: The test shall be conducted at least quarterly during the first twelve months after SCR replacement starting in 2024. Testing may be conducted annually after 4 successful quarterly tests. If the results of any annual test show noncompliance, then quarterly tests shall be conducted until at least 4 consecutive quarterly tests show compliance, at which time annual tests may be resumed.

The NO<sub>x</sub> 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 NO<sub>x</sub> emissions using District Method 100.1 measured over a 60 minute averaging time period

Source test results shall be submitted to the District 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) and mass rate (lb/hr). All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute. All moisture concentration 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.

**[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]

## 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:**

D29.3 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
SOX emissions	AQMD Laboratory Method 307-91	Not Applicable	Fuel sample
VOC emissions	District Method 25.3	1 hour	Outlet of the SCR serving this equipment
PM10 emissions	District method 5.1	District-approved averaging time	Outlet of the SCR serving this equipment
PM2.5	District method 5.1	District-approved averaging time	Outlet of the SCR serving this equipment

## **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:**

The test(s) shall be conducted at least once every three years. The SCAQMD shall be notified of the date and time of the test at least 7 days prior to the test.

The test shall be conducted in accordance with an 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 unless otherwise authorized by the Executive Officer.

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 test 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. A single test may be conducted for both PM10 and PM2.5. The results of the test shall be assumed to be all PM2.5 and smaller.

For natural gas fired turbines only, for the purpose of demonstrating compliance with VOC BACT limits as determined by SCAQMD, the operator 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 SCAQMD method 25.3, nor does it

## 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:**

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

Source test results shall be submitted to the District 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 (lb/hr), and lb/MMCF. All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute. All moisture concentration 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.

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

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

D29.4 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
NOX emissions	District method 100.1	1 hour	Outlet of the SCR serving this equipment
CO emissions	District method 100.1	1 hour	Outlet of the SCR serving this equipment

## FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

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

VOC emissions	District Method 25.3 Modified	1 hour	Outlet of the SCR serving this equipment
NH3 emissions	District method 207.1	1 hour	Outlet of the SCR serving this equipment

## **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:**

This is the initial performance test after replacement of the SCR in 2024.

The test 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, unless otherwise authorized by the Executive Officer.

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 test shall be conducted no later than 180 days after recommissioning unless otherwise authorized the the Executive Officer.

The NOx test and the NH3 test shall be performed simultaneously

All tests shall be conducted when the equipment is operating at as close to 100% load as practicable, but not less than 90%.

For natural gas fired turbines only, for the purpose of demonstrating compliance with VOC BACT as determined by SCAQMD, the operator shall use SCAQMD Method 25.3 modified as follows:

- a) Triplicate stack gas samples are extracted directly into Summa canisters, maintaining a final canister pressure between 400-500 mm Hg absolute,
- b) Pressurization of the Summa canisters is done with zero gas analyzed/certified to containing less than 0.05 ppmv total hydrocarbons as carbon, and
- c) Analysis of Summa canisters is per the canister analysis portion of AQMD Method 25.3 with a minimum detection limit of 0.3 ppmvC or less and reported to two significant figures. The temperature of the Summa canisters when extracting samples for analysis is not to be below 70 degrees Fahrenheit.

The use of this modified method for VOC compliance determination does not

## 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:

mean that it is more accurate than AQMD Method 25.3, nor does it mean that it may be used in lieu of AQMD Method 25.3 without prior approval except for the determination of compliance with the VOC BACT level of 2.0 ppmv calculated as carbon for natural gas fired turbines.

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

Source test results shall be submitted to the District 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 (lb/hr), and lb/MMCF. All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute. All moisture concentration 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.

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

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

D82.1 The operator shall install and maintain a CEMS to measure the following parameters:



## FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

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

CO concentration in ppmv

The CEMS shall measure the CO concentration at least once per minute

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

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

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 =  $K C_{co} F_d [20.9 / (20.9\% - \%O_2 d)] [(Q_g * HHV) / 106]$ ,  
where

$K = 7.267 \times 10^{-8}$  (lb/scf)/ppm

$C_{co}$  = CO concentration, ppm

$F_d = 8710$  dscf/MMBTU natural gas

$\%O_2 d$  = Hourly ave % by volume O<sub>2</sub>, dry corresponding to  $C_{co}$

$Q_g$  = Fuel gas usage during the hour, scf/hr

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

**[RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 218, 5-14-1999; RULE 218.1, 5-14-1999; RULE 218.1, 5-4-2012]**

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

D82.2 The operator shall install and maintain a CEMS to measure the following parameters:

## 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:**

NOx concentration in ppm and O2 in percent

The CEMS shall measure the NOx concentration at least once per minute

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

The CEMS shall comply with the requirements of Rule 2012 and 40 CFR Part 75. The CEMS shall convert the actual NOx concentrations to mass emission rates in accordance with the provisions of Rule 2012 and 40 CFR Part 75.

**[RULE 1135, 7-19-1991; RULE 1135, 11-2-2018; RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015; RULE 2005, 11-5-2021; RULE 2012, 2-5-2016; 40CFR 60 Subpart KKKK, 3-20-2009; 40CFR 72 - Acid Rain Provisions, 11-24-1997]**

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

#### **E. Equipment Operation/Construction Requirements**

E57.1 The operator shall vent this equipment to the SCR and the oxidation catalysts whenever the turbine is in operation..

Ammonia injection shall commence when the exhaust temperature into the SCR catalyst is between 480 degrees F and 715 degrees F.

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

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

E193.1 The operator shall operate and maintain this 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.

[CA PRC CEQA, 11-23-1970]

## **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:**

[Devices subject to this condition : D1, C4, D7, C10, D13, C16, D19, C22, D25, C28]

E193.2 The operator shall construct this equipment according to the following specifications:

The SCR catalyst shall be installed and configured as specified in the permit to construct application unless otherwise approved in writing by the Executive Officer. The operator shall notify South Coast AQMD upon completion of the installation of the SCR for each unit.

This permit to construct shall expire 1 year after the issue date (Section H Revision 9) unless an extension has been approved in writing by the Executive Officer. Any extension requests shall be made in writing at least 15 days prior to permit expiration.

**[RULE 205, 1-5-1990]**

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

E448.3 The operator shall comply with the following requirements:

## **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:**

Each turbine assembly installed and operating at this site must have a manufacturer nameplate affixed to the turbine housing in a position that is visible within or adjacent to the engine compartment. The nameplate shall contain the following information at a minimum, the make and model number of the turbine, the date of manufacture, and the serial number.

Only GE LM100PA-NGWG06 turbine engines with the following serial numbers shall be used at this site: 878-146 (manufacture date 2012), 878-147 (manufacture date 2012), 878-148 (manufacture date 2012), 878-149 (manufacture date 2012), 878-157 (manufacture date 2012), 878-160 (manufacture date 2012).

The operator shall provide South Coast AQMD personnel access to the engine compartment for nameplate verification upon request.

Turbine replacement among the site fleet listed above shall only be allowed with notification when the operator has determined that the turbine operating at this site needs evaluation and/or repairs which cannot reasonably be performed in situ.

The operator shall notify South Coast AQMD (1-800-CUT-SMOG) no later than 30 days after becoming aware of the need for turbine replacement within the site fleet. The notification shall include: start date of the turbine replacement and date when the repaired turbine will be returned to the site, if applicable, the serial # of the turbine replaced and the serial # of the turbine replacement, and a description of the maintenance, repairs, and parts replacement to be performed on the turbine being replaced.

The operator shall also provide an estimate of the cost of the work to be performed on the damaged turbine, and an estimate of the cost of a comparable new turbine

At the time the operator notifies South Coast AQMD of a proposed replacement, South Coast AQMD will take into consideration the cost data in determining whether an application shall be filed by the operator.

The operator shall maintain a log of the information demonstrating compliance

## 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:**

with this condition on site.

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

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

#### **H. Applicable Rules**

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
NOX	40CFR60, SUBPART	KKKK
SOX	40CFR60, SUBPART	KKKK

**[40CFR 60 Subpart KKKK, 3-20-2009]**

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

#### **I. Administrative**

I298.1 This equipment shall not be operated unless the facility holds 43682 pounds of NO<sub>x</sub> 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 35240 pounds of NO<sub>x</sub> 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.

## 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:**

[**RULE 2005, 12-4-2015**; RULE 2005, 11-5-2021]

[Devices subject to this condition : D1]

- 1298.2 This equipment shall not be operated unless the facility holds 43682 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 35240 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.

[**RULE 2005, 12-4-2015**; RULE 2005, 11-5-2021]

[Devices subject to this condition : D7]

- 1298.3 This equipment shall not be operated unless the facility holds 43682 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 35240 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.

## 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:**

[**RULE 2005, 12-4-2015**; RULE 2005, 11-5-2021]

[Devices subject to this condition : D13]

- 1298.4 This equipment shall not be operated unless the facility holds 43682 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 35240 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.

[**RULE 2005, 12-4-2015**; RULE 2005, 11-5-2021]

[Devices subject to this condition : D19]

- 1298.5 This equipment shall not be operated unless the facility holds 43682 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 35240 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.

## **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:**

**[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]**

[Devices subject to this condition : D25]

- 1298.7 This equipment shall not be operated unless the facility holds 2280 pounds of SO<sub>x</sub> 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 2280 pounds of SO<sub>x</sub> 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.

**[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]**

[Devices subject to this condition : D1]

- 1298.8 This equipment shall not be operated unless the facility holds 2280 pounds of SO<sub>x</sub> 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 2280 pounds of SO<sub>x</sub> 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.



## **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:**

**[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]**

[Devices subject to this condition : D7]

1298.9 This equipment shall not be operated unless the facility holds 2280 pounds of SO<sub>x</sub> 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 2280 pounds of SO<sub>x</sub> 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.

**[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]**

[Devices subject to this condition : D13]

1298.10 This equipment shall not be operated unless the facility holds 2280 pounds of SO<sub>x</sub> 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 2280 pounds of SO<sub>x</sub> 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.

## 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:**

[**RULE 2005, 12-4-2015**; RULE 2005, 11-5-2021]

[Devices subject to this condition : D19]

I298.11 This equipment shall not be operated unless the facility holds 2280 pounds of SO<sub>x</sub> 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, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 2280 pounds of SO<sub>x</sub> 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.

[**RULE 2005, 12-4-2015**; RULE 2005, 11-5-2021]

[Devices subject to this condition : D25]

#### **K. Record Keeping/Reporting**

K67.5 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Date, time, and duration of each start-up and shutdown

Annual hours of operation of the turbine

Minute by minute data (NO<sub>x</sub>, CO, and O<sub>2</sub> concentration and fuel flow rate at a minimum) during each turbine start up and shutdown

Total annual power output in MWh, gross and net, total hours of operation and fuel consumption.

## **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:**

**[RULE 1135, 7-19-1991; RULE 1135, 1-7-2022; RULE 2012, 2-5-2016; 40CFR 60  
Subpart KKKK, 3-20-2009; 40CFR 72 - Acid Rain Provisions, 11-24-1997]**

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