# PETITION FOR VARIANCE SV 4/10 BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

			2025 M	***
PETITI	ONER: City of Burbank, Burbank Water & Power, S	CPPA (	CASE NO:	5601-6
		1	FACILITY ID:	128243
FACILI <i>[locati</i> e	TY ADDRESS: <u>164 W Magnolia Blvd</u> on of equipment/site of violation; specify business/d	corporate address,	, if different,	under Item 2, below]
City, St	tate, Zip <u>: Burbank, CA 91502</u>			
1.	TYPE OF VARIANCE REQUESTED (more than one biselecting)  INTERIM SHORT REGULAR	ox may be checked		nent A, Item 1, before
2.	CONTACT: Name, title, company (if different than authorized to receive notices regarding this Petition (not	o more than two au	thorized pers	number of persons ons).
	Frank Messineo	<u>Claudia</u>	Reyes	
	Power Production Manager	Senior E	<u>Environmenta</u>	Engineer .
	Burbank Water & Power	Burbank	: Water & Pov	ver
	164 W Magnolia Blvd, Burbank, CA Zip 91502	164 W Magnolia	Blvd, Burbar	ık, CA <i>Zip</i> 91052
	<b>2</b> (818) 238-3858 Ext.	<b>જ</b> ( 818 )	238-3510	Ext.
	Fax ( 818 ) 238-3535	Fax <u>(818)</u>	238-3535	
	E-mail_FMessineo@burbankca.gov	E-mail_CSReye	es@burbankc	a.gov
3.	RECLAIM Permit Yes No	Title V Permit	⊠ Yes	☐ No
4.	GOOD CAUSE: Explain why your petition was not file (Required only for Emergency and Interim Variances;	ed in sufficient time see Attachment A,	to issue the r Item 4)	equired public notice.
	N/A			
5.	Briefly describe the type of business and processes at	your facility.		

The Magnolia Power Project (MPP) facility produces electrical power. The MPP is a clean, natural gas-fired, combined-cycle conventional electric plant. The facility operates a combustion turbine generator, a heat recovery steam generator with duct burner which is released with the combustion turbine exhaust through a 150-foot exhaust stack, a steam turbine generator, two underground 69 kV transmission circuits, a cooling tower, storage tanks, natural gas compressors, makeup water demineralizers, a zero liquid discharge wastewater treatment system, and other ancillary processes. The facility uses reclaimed water from the Burbank Water Reclamation Plant (BWRP) for cooling tower makeup.

The facility is a project owned by the Southern California Public Power Authority (SCPPA), consisting of one combined cycle gas turbine generator that produces power for the six participating agencies of SCPPA, including the cities of Burbank, Anaheim, Glendale, Pasadena, Cerritos, and Colton. The approximate total power output of the facility is 343 MW.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Gas Turbine, No. 1, Combined Cycle, Natural Gas, General Electric Model PG7241FA, with Dry Low NOx Combustors, DLN 2.6+,1787 MMBTU/HR with	624214	D4	N/A
Generator, 181.1 MW Generator, Heat Recovery Steam Steam Turbine, Steam, 142 MW			

<sup>\*</sup>Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The MPP plant operates a Model 7FA General Electric (GE) combustion turbine generator. The GE turbine (Device D4) is the primary unit used for electrical power generation at the MPP facility. Device D4 uses selective catalytic reduction (SCR) for NOx emissions control and an oxidation catalyst for CO and VOC emission control. Because this unit is the primary generating unit at the MPP facility, it is central to the facility's power generation operations.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No Interest No Describe the maintenance and/or inspection that was performed.

The plant is currently undergoing regularly scheduled maintenance based on the service bulletin provided by GE, the gas turbine manufacturer, for this type of equipment. Included in this service bulletin is the replacement of gas turbine rotor components, which must be replaced approximately every 144,000 operating hours (approximately 15-20 years depending on operating schedule), according to the service bulletin. In addition to the rotor replacement being performed as part of this service bulletin, the gas turbine undergoes the following regular maintenance activities:

-Daily: Monitor and inspect operating conditions, vibrations, temperatures, emissions etc.
-Quarterly: Perform offline water wash of the gas turbine compressor and perform lube oil analysis.

	-Annual: Perform routine mail -Quadrennial: Perform routine	ntenance, borescope inspection and calibrations. e replacements of hot gas path components, fuel nozzle, fuel valves, etc.
9.	are seeking variance relief (if fe	mit conditions [indicating the specific section(s) and subsection(s)] from which you questing variance from Rule 401 or permit condition, see Attachment A). Briefly violation of each rule or condition (see Attachment A, Item 9, Example #2).
	Rule Title V Permit, Section D (dated February 16, 2022), Permit Condition A195.2	Explanation  D4 is required to meet a NOx emission limit of 2.0 ppmv averaged over 3 hours during normal operations, and NOx emissions are required to not exceed 440 lbs. during the 6 hours after commencement of a start-up. NOx emissions during the 30 minutes prior to the conclusion of a shutdown shall not exceed 25 lbs. The operator shall limit the number of start-ups to 5 per month.
	Title V Permit, Section D (dated February 16, 2022), Permit Condition A195.3	D4 is required to meet a CO emission limit of 2.0 ppmv averaged over 1 hour during normal operations. CO emissions are required to not exceed 120 lbs. during the 30 minutes prior to the conclusion of a shutdown. The operator shall limit start-up time to not exceed 6 hours per startup per day. the number of start-ups to 5 per month.
	Rule 2005	RECLAIM rules limit NOx mass emission during startup and shutdown to not exceed 440 lbs/startup and 25 lbs/shutdown.
	SCAQMD Rule 3002(c)	Rule 3002 requires Title V permit holders to comply with all terms, requirements, and conditions specified in the Title V permit at all times.
10.	Are the equipment or activities s  Case No. Date of	ubject to this request currently under variance coverage? Yes No Action Final Compliance Explanation  Date
11.	Are any other equipment or activ coverage? Yes No	rities at this location currently (or within the last six months) under variance
	Case No. Date of	Action Final Compliance Explanation Date
12.	Were you issued any Notice(s) o past year? Yes No	of Violation or Notice(s) to Comply concerning this equipment or activity within the
	If yes, you must attach a copy of	
13.		ts from the public regarding the operation of the subject equipment or activity es No X
	If yes, you should be prepared to	present details at the hearing.
14.	Explain why it is beyond your rea specific event(s) and date(s) of or	asonable control to comply with the rule(s) and/or permit condition(s). Provide ccurrence(s), if applicable.

The Green Rotor Run-In is a thermal soaking required process for new rotors. GE requires that the newly installed rotor reach operating temperature at a controlled rate with no load for the first fired event and allow the heat to equalize through the entire rotor over a 4-hour period. During this process, buckets will move into secure position within the rotor and vibration will be monitored.

Excess emissions may occur because the requirement for this run-in process involves operating the combustion turbine at a "full speed no load" condition, which is not a normal operating condition. During this process, the combustion turbine may emit emissions at a higher level compared to normal operations. The permitted duct burner associated with the gas turbines heat recovery system will not be operated during this rotor run-in period.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

GE notified the facility during the pre-outage meeting on February 4<sup>th</sup>, 2025, that a run-in process for conditioning a new rotor will be required. At that point, MPP requested emissions data from GE regarding the expected emission output from the combustion turbine during this process and determined that excess emission may occur.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

The expected date of the required run-in operation process is scheduled for the week of April 14, 2025.

17. What would be the harm to your business during and/or after the period of the variance if the variance were not granted?

Economic losses: <u>Approx. \$1,000,000 / Day</u>

Number of employees laid off (if any): <u>N/A</u>

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

If the variance is not granted, then BWP could not operate the MPP unit to perform the required rotor testing and complete the unit maintenance required by the GE service bulletin. In this case, the facility may not be able to continue to operate the MPP unit.

Normally, the MPP combined cycle unit provides the City of Burbank and other project participants with "baseload" power generation, which refers to power generated by a unit that is available to operate continuously to meet the minimum level of power demand of Burbank Water and Power (BWP) and other participants' customers. If the MPP unit is not available to provide baseload generation, then BWP must purchase replacement energy from the market at a cost of approximately \$55,000 to \$81,000 per day based on market conditions. The MPP participants must also purchase replacement energy from the market at an approximate price of \$77,000 to \$125,000 per day based on market conditions. Due to system conditions, extreme heat waves, and the volatility of the energy market in the summer, there is a possibility that these prices could spike to extreme values.

In addition to these economic losses, it is important to consider the reliability of the power system. Power generation capacity must be enough to meet peak demand for electricity during summer months, including a reserve to address variability and uncertainty in demand. The MPP unit's status as baseload unit is critical to the reliability of the entire system as it provides constant reliable power to meet the demand on the system. It is relied on to balance renewable energy that is very intermittent by controlling frequency and voltage. MPP makes up the difference in demand when renewable energy sources cut out due to loss of wind, clouds, or disruption to energy import transmission, for example.

If the MPP unit is not available, not only will MPP's participants have to purchase replacement generation at significantly higher prices compared to the usual costs, but in some cases, power may not even be available at all during summer months due to higher demand. Therefore, not completing the recommissioning as

scheduled will cause MPP's participants significant economic losses, as well as affecting the reliability of the power system during the upcoming summer months.

For those MPP participants in the California Independent System Operator (CAISO) market, there are additional economic uncertainties if the variance is not granted. If the MPP unit is not online for a prolonged period, it will not count towards the CAISO Resource Adequacy (RA) requirement for system capacity. This could occur when there is a prolonged outage at the facility, a catastrophic event at the facility, or other circumstances that would prevent the unit from coming online.

The implications of this depend on the capacity market. Assuming \$3.50 KW-month (winter) and \$5.00 KW-month (summer) capacity prices, the losses to CAISO participants could range from \$533,000 per month to \$675,000 per month. These are the estimated prices that CAISO participants could pay for capacity from the open market, if it is available. However, it is important to note that the capacity of this magnitude may not be available and that these CAISO entities may be subject to additional penalties in lieu of compliance.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

Curtailment is not an option because the unit must be operating to perform the required run-in test.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A) Total Estimated Excess Emissions (lbs/day)	(B) Reduction Due to Mitigation (lbs/day)	(C)* Net Emissions After Mitigation (lbs/day)
NOx	239 lbs		
со	122 lbs		

<sup>\*</sup> Column A minus Column B = Column C

Excess	Opacity:	%

20. Show calculations used to estimate quantities in No. 19, **or** explain why there will be no excess emissions.

GE provided mass emission estimates on a lb/hr basis for NOx and CO during the rotor run. These assume no emission controls.

NOx based on a 4-hour test run including 30 min shutdown event:

GE NOx Emission Estimate = 176 lb/hr
Maximum lbs per day = 176 lb/hr x 4 hrs = 704 lbs/day
Excess emissions = 704 lbs - 440 lbs/start - 25lbs/shutdown= 239 lbs NOx

CO based on 30 min shutdown

GE CO Emission Estimate = 484 lb/hr Excess emissions = 484lbs/hr / 2 = 242lbs/30 min- 120 lbs/shutdown = 122 lbs CO

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

The period needed to perform the rotor run-in will be limited to the extent feasible while still meeting the installation requirements, which is expected to be approximately 4 hours.

During the rotor run-in period, temperatures are expected to increase and allow for partial use of the emissions control equipment. Although the relief is from the BACT limits, which are not expected to be met, some limited reduction in emissions may be expected due to the partial use of the permitted emission control technologies if the exhaust gas reaches a high enough temperature to operate emission reduction equipment. The equipment will remain monitored by the certified CEMS system which will record actual NOx and CO emissions. The facility will also monitor the operations and if potential issues arise that may result in delays or an extended duration of the rotor run, the process will be terminated and re-run with a new start-up.

If exhaust gas temperatures reach a high enough temperature, there is a possibility that the emission control equipment could be effective enough for the gas turbine to meet BACT levels prior to completion of the run-in. If this were to happen, the gas turbine would be subject to the BACT limits for NOx and CO. Therefore, relief is requested to exceed the NOx mass emission limit during start-up, the NOx and CO mass emission limits during shutdown, and the NOx and CO BACT limits operating with partial control during the run-in period.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.

NOx and CO emissions from the unit will be monitored using the device's certified CEMS as required by the facility's Title V/RECLAIM permit. These emissions will continue to be monitored via CEMS for the duration of the variance period.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

The facility will continue to operate emission control equipment to the extent possible based on exhaust gas temperature, and the uncertainty associated with a full speed no load operating condition. In addition, MPP will end the full speed no load operation in a safe but efficient timeframe following completion of the run-in rotor test. This will limit the duration of the rotor run-in to the extent it is possible to minimize emissions.

24. State the date you are requesting the variance to begin: <u>April 14<sup>th</sup>, 2025</u>; and the date by which you expect to achieve final compliance: <u>April 31<sup>st</sup>, 2025 (or at the completion of the run-in test)</u>.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.								
None		Ext						
If the petition was co	mpleted by someone other than the	petitioner, please provide their name and title belo						

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Signature	& Messines	<u>Frank Mes</u> Print Name	sineo	
Title: Power Produc	tion Manager			
•				
		•		
				,



#### SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

### **PAYMENT VOUCHER**

**VOUCHER NO.** 23611

PAGE: 1

**FACILITY ID:** 

128,243.00

PRINT DATE: 03/11/2025

COMPANY NAME: BURBANK CITY, BURBANK WATER & POWER, SCP

**CONTACT NAME: CLAUDIA REYES** 

ADDRESS:

164 W Magnolia Blvd

Burbank CA 91052

Description	Transaction Balance
Short Variance Filing Fee (Without Interim) - Schedule B	1586.32
·	į
	;

**VOUCHER TOTAL:** 

1586.32

Valid through: 06/30/2025



Title Page

Facility ID:

128243

Revision #: 29 Date: February 16, 2022

### FACILITY PERMIT TO OPERATE

### BURBANK CITY, BURBANK WATER & POWER, SCPPA 164 W MAGNOLIA BLVD BURBANK, CA 91502

#### 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

Jason Aspell

Deputy Executive Officer Engineering and Permitting



### FACILITY PERMIT TO OPERATE BURBANK CITY,BURBANK WATER & POWER,SCPPA

### SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR:

BURBANK CITY, BURBANK WATER &

POWER, SCPPA

LEGAL OPERATOR (if different than owner):

**EQUIPMENT LOCATION:** 

164 W MAGNOLIA BLVD

BURBANK, CA 91502-1720

MAILING ADDRESS:

164 W MAGNOLIA BLVD

BURBANK, CA 91502-1720

RESPONSIBLE OFFICIAL:

JORGE SOMOANO

TITLE:

EXECUTIVE DIRECTOR

TELEPHONE NUMBER:

(818) 238-3550

CONTACT PERSON:

CLAUDIA REYES

TITLE:

SR. ENV. ENGINEER

TELEPHONE NUMBER:

(818) 238-3510

TITLE V PERMIT ISSUED:

January 10, 2020

TITLE V PERMIT EXPIRATION DATE:

January 09, 2025

RECLAIM			
NOx: YES SOx: NO CYCLE: 1 ZONE: COASTAL			



Section D Page: Facility ID: 128243 Revision #: Revision #: 11 Date: February 16, 2022

### FACILITY PERMIT TO OPERATE BURBANK CITY, BURBANK WATER & POWER, SCPPA

# SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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
Process 1: INORGANIC N	<b>IATE</b>	RIAL STOR	RAGE		
STORAGE TANK, PRESSURIZED, AQUEOUS AMMONIA 19%, WITH VAPOR BALANCE SYSTEM, 12000 GALS A/N: 386307 Process 3: INTERNAL CO GAS TURBINE, NO. 1, COMBINED	)MBUS	STION: PO	<b>WER GENERA</b> NOX: MAJOR		C157.1, E144.1, E193.1
CYCLE, NATURAL GAS, GENERAL ELECTRIC, MODEL PG7241FA, WITH DRY LOW NOX COMBUSTORS, DLN 2.6+, 1787 MMBTU/HR WITH A/N: 624214			SOURCE**	CO: 2 PPMV (4) [RULE 1303(a) (1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]: CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 2 PPMV (4) [RULE 2005, 6-3-2011]; NOX: 105 PPMV (8) [40CFR 60 Subpart GG, 2-27-2014]; 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]; PM: 11 LBS/HR (5C) [RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 150 PPMV (8) [40CFR 60 Subpart GG, 3-6-1981]; VOC: 2 PPMV (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.2. A195.3, A195.4, A327.1, C1.4. D29.3, D82.1, D82.2, E57.1, E193.1, H23.1
GENERATOR, 181.1 MW					
GENERATOR, HEAT RECOVERY STEAM					
STEAM TURBINE, STEAM, 142 MW					

' (		)	(	lΑ	)	1)	B)	D	enotes	REC	$\mathbb{C}L/$	MI	emission	factor
-----	--	---	---	----	---	----	----	---	--------	-----	----------------	----	----------	--------

(3) Denotes RECLAIM concentration limit (4)

(5) (5A) (5B) Denotes command and control emission limit (6)

Denotes NSR applicability limit (7)

(9)See App B for Emission Limits (2) (2A) (2B) Denotes RECLAIM emission rate

Denotes BACT emission limit

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 D Page: 11 Facility ID: 128243 Revision #: 11 Date: February 16, 2022

### FACILITY PERMIT TO OPERATE BURBANK CITY,BURBANK WATER & POWER,SCPPA

# SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

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

[Devices subject to this condition: C10]

A195.2 The 2 PPMV NOX emission limit(s) is averaged over 3 hours at 15 percent oxygen, dry.

The 2.0 PPM NOX emission limit shall not apply during startup and shutdown periods. Startup time shall not exceed 6 hours per startup per day. NOx emissions during the 6 hours after commencement of a start up shall not exceed 440 lbs. Shutdown time shall not exceed 30 minutes per shutdown per day. NOx emissions during the 30 minutes prior to the conclusion of a shutdown shall not exceed 25 lbs. The operator shall limit the number of start ups to 5 per month.

The operator shall keep records of the date, time and duration as well as minute by minute data (NOx, CO and O2 concentration and fuel flow rate at a minimum) of each startup and shutdown

[RULE 2005, 6-3-2011]

[Devices subject to this condition: D4, D6]

A195.3 The 2 PPMV CO emission limit(s) is averaged over 1 hour at 15 percent oxygen, dry.

The 2.0 PPM CO emission limit shall not apply during startup and shutdown periods. Startup time shall not exceed 6 hours per startup per day. Shutdown time shall not exceed 30 minutes per shutdown per day. CO emissions during the 30 minutes prior to the conclusion of a shutdown shall not exceed 120 lbs. The operator shall limit the number of start ups to 5 per month.

The operator shall keep records of the date, time and duration as well as minute by minute data (NOx, CO and O2 concentration and fuel flow rate at a minimum) of each startup and shutdown



Section D Page: 12 Facility ID: 128243 Revision #: 11

### FACILITY PERMIT TO OPERATE BURBANK CITY,BURBANK WATER & POWER,SCPPA

# SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

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

[Devices subject to this condition: D4, D6]

A195.4 The 2 PPMV VOC emission limit(s) is averaged over 1 hour at 15 percent, dry.

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

[Devices subject to this condition: D4, D6]

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: D4, D6]

### C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the fuel usage to no more than 555 MM cubic feet per year.

[RULE 1303(b)(1)-Modeling, 5-10-1996; RULE 1303(b)(1)-Modeling, 12-6-2002; RULE 2005, 6-3-2011]

[Devices subject to this condition: D6]

C1.2 The operator shall limit the fuel usage to no more than 6.66 MM cubic feet per day.