

LADWP Comments
Proposed Amended Rule 1135 and Proposed Rule 429.2
December 3, 2021

Rule 1135

1. Section d.6– July 1, 2022 Deadline for Submittal of Permit Modifications

- LADWP requests that Rulemaking staff seek clarification from Permitting Staff regarding the expected permit modifications (i.e. blanket provision that refers to the Rule 1135 applicability OR individual permit conditions that reflect specific provisions under the rule).
- LADWP would also like to get clarification from Permitting Staff on the amount of time needed to process the permit applications and whether six months would be sufficient.
- LADWP also requests that the revised permit conditions (specifically the new NO_x concentration limits) specify the implementation/effective date.

2. Section e.F.8 – Operations Recordkeeping

- LADWP requests that SCAQMD clarify in the staff report that existing reporting formats being used by facilities to provide information to inspectors are acceptable and meet the requirements listed in Section e.F.8.
- LADWP requests SCAQMD to clarify acceptable recordkeeping options/processes (eg. source of data/methodology for providing net megawatt-hours of electricity produced).

3. Section (f) (3) – Source Testing

- LADWP requests that SCAQMD include language that the fuel meter may be calibrated on an annual basis as an alternative to performing the RATA during diesel firing.
- In addition, add language to allow RATA to be performed not only during diesel readiness testing but also during force majeure when firing is allowed by the permit.
- Please refer to the text in bold for suggested edits to the language:

The owner or operator of an electric generating unit shall not be subject to NOx emission limits specified in subdivision (d) when it burns liquid petroleum fuel during emissions source testing, and the electric generating unit may burn liquid petroleum fuel for emissions source testing as specified by South Coast AQMD rules or the Permit to Operate, including initial certifications of Continuous Emissions Monitoring Systems (CEMS) and semi-annual Relative Accuracy Test Audits (RATAs). The owner or operator ~~shall only~~ conduct RATA tests concurrently with distillate fuel oil readiness testing or during force majeure when diesel firing is allowed by the permit. As an alternative to performing RATA tests during diesel firing, the fuel meter may be calibrated on an annual basis.

Rule 429.2

1. Section (c)(6) - Scheduled Startup

- Please confirm and clarify in the Staff Report that the facility is allowed to keep a record of the planned number of scheduled starts by January 1 of each year, but will not disclose non-public information (specific dates and time of the scheduled starts) until after they have occurred.

2. Section (d)(4) - End of Startup

- Stable conditions include the full deployment and implementation of all pollution control equipment. Parameters for establishing stable conditions include but are not limited to ammonia injection, mode 6Q/most efficient natural gas burner firing pattern, NOx water injection, and meeting minimum loads (for NOx compliance) and specific equipment temperatures (i.e. ammonia heater minimum temperature and SCR operating temperature).
- LADWP proposes the following revised language which ties the end of startup to when the unit meets stable conditions, minimum operating temperature, and full deployment of post-combustion control equipment:

*If a unit reaches stable conditions, the NOx post-combustion control equipment reaches minimum operating temperature, and **full deployment of all post-combustion NOx control equipment** commences before reaching the startup duration limit specified in paragraph (d)(2), paragraph (d)(3), the Permit to Construct, or the Permit to Operate, **whichever startup duration** is more stringent, the startup period shall be considered over.*

3. Section d.3 – Startup and Shutdown Limits for Equipment Installed after January 7, 2022

- This table is focused on existing natural gas technology. LADWP suggests that SCAQMD indicate in the Staff Report that the rule will be amended to account for other technology options in the future.

4. Section d.5 and d.6 – Maximum No. of Scheduled Startups/Year

- LADWP suggests revising “required to perform DFO readiness testing” to “permitted to perform DFO readiness testing”

5. Section (d)(9) – Operation of Post-combustion Equipment

- Stable conditions include but are not limited to full deployment and implementation of all pollution control equipment which may include ammonia injection, mode 6Q/most efficient natural gas burner firing pattern, NOx water injection, and meeting minimum loads (for NOx compliance) and specific equipment temperatures (i.e. ammonia heater minimum temperature and SCR operating temperature).

- Suggested revision to language:

*On and after January 1, 2024, an owner or operator of an electric generating unit with NOx post-combustion control equipment shall operate the NOx post-combustion control equipment, including **but not limited to** the injection of any associated chemical reagent(s) into the exhaust stream to control NOx, if the temperature of the exhaust gas to the inlet of the NOx post-combustion control equipment is greater than or equal to the minimum operating temperature and the temperature is stable.*