

SOUTH COAST AIR QUALITY  
CLERK OF THE BOARD

2025 JUL -2 AM 12:00

PETITION FOR VARIANCE  
BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

PETITIONER: Walnut Creek Energy, LLC

CASE NO: 6230-7

FACILITY ID: 146536

FACILITY ADDRESS: 911 Bixby Dr

*[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]*

City, State, Zip: City of Industry, CA 91745

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☒ INTERIM ☒ SHORT ☐ REGULAR ☐ EMERGENCY ☒ EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Greg Wolffe  
Principal Scientist, Yorke Engineering, LLC

George Piantka  
Senior Director, NRG

31726 Rancho Viejo Rd, Suite 218

911 Bixby Drive

San Juan Capistrano, CA Zip 92675

City of Industry, CA Zip 91745

(909) 861-2729 Ext.

(760) 707-6833 Ext.

Fax ( )

Fax ( )

E-mail GWolffe@YorkeEngr.com

E-mail George.Piantka@nrg.com

3. RECLAIM Permit ☒ Yes ☐ No

Title V Permit ☒ Yes ☐ No

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Walnut Creek Energy, LLC (WCE) (Facility ID 146536) operates five GE LMS100 simple cycle gas turbines (Devices D1, D7, D13, D19, D25) subject to CEMS requirements under Rule 218 for CO and Rule 2012 for NOx. WCE is experiencing a facility-wide power outage, which began on Saturday June 28, 2025 after Unit 3's Potential Transformer (PT) and Current Transformer (CT) failed at approximately 20:44. The PT/CT failure caused the main breaker to subsequently trip and fail resulting in a complete loss of power across the facility and rendering all five turbines inoperable. At 4:04 AM on June 29, 2025, the CEMS battery were depleted, and

the CEMS became inoperable. The entire plant remains offline and is expected to stay down until repairs are completed—currently anticipated by July 11<sup>th</sup> (or shortly thereafter, likely before July 30, 2025).

Rule 2012 (amended November 3, 2023) contains provisions that allow a CEMS to not be subject to the monitoring requirements for NO<sub>x</sub>, and for NO<sub>x</sub> emissions to be considered valid zeros, when the source does not operate for a minimum of 168 consecutive hours, contingent on meeting additional requirements to document non-operation. WCE intends to comply with the provisions of Rule 2012(c)(2)(D-E) no variance is being requested for NO<sub>x</sub>.

While there is a comparable provision for CO CEMS requirements (Rule 218.2(e)(3) (amended September 2, 2022), because WCE is currently a RECLAIM facility, it appears that there is not currently an equivalent counterpart under Rule 218, which governs CO CEMS requirements for WCE. As a result, it appears that a variance will be required because WCE will not be able to comply with these requirements when there is no power to the CEMS. Accordingly, WCE is filing this application for variance.

Because of the outage, the facility cannot provide power to the CEMS equipment for Units 1-5 (Devices D1, D7, D13, D19, D25) during the period of June 29 – July 11, 2025 (or shortly thereafter, but before July 30, 2025) to comply with the CO CEMS monitoring requirements as required by Rule 218. WCE investigated the potential use of generators to maintain power to the CEMS; however, upon further investigation, the timing to set up the generators would likely exceed the time the variance is needed for, and it would not be beneficial to run the generators to maintain power to the CEMS while the rest of the plant is down.

Because Units 1-5 will be in outage during this period, there will be no emissions and there is no risk to the environment if the CO CEMS is not in operation.

5. Briefly describe the type of business and processes at your facility.

Walnut Creek Energy (WCE) is a 500-megawatt natural gas-fired, simple cycle electrical generating facility, designed to meet electric generation load during periods of high demand. WCE operates five (5) GE LMS100 simple-cycle gas turbines, each with an electrical generator and emissions control equipment. As a simple-cycle configuration, there are no heat recovery steam generators, duct burners, or steam turbines.

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)*
GE LMS100 simple cycle gas turbine (Unit 1)	Application No: 647716	D1	N/A
GE LMS100 simple cycle gas turbine (Unit 2)	Application No: 647717	D7	N/A
GE LMS100 simple cycle gas turbine (Unit 3)	Application No: 647718	D13	N/A
GE LMS100 simple cycle gas turbine (Unit 4)	Application No: 647719	D19	N/A
GE LMS100 simple cycle gas turbine (Unit 5)	Application No: 647720	D25	N/A

\*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 Units 1-5 gas turbines are dispatched according to local demand, system load, and system reliability requirements dictated by the California Independent System Operator (Cal ISO).

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: Daily inspection and calibration of the CEMS and further inspection/maintenance annually during annual outages. Date of last maintenance and/or inspection: Maintenance/inspection week of June 23, 2025. Last outage April 25-29, 2025.

Describe the maintenance and/or inspection that was performed.

Regular maintenance and inspections are performed on the entire power generating system for all five (5) units at least annually during regularly scheduled outages that are coordinated with CAISO. Annual inspections are comprehensive and evaluate the mechanical integrity of the equipment, wearing of parts, and other ancillary equipment necessary to operate the units in compliance.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
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.
SCAQMD Rule 218(b) and Permit Condition #D82.1 of Facility Permit 146536 (Rev. 9), applicable to Device D1, D7, D13, D19, D25)	Rule 218 and Condition D82.1 require that CEMS be installed and maintained to measure CO concentration for Units 1-5. Due to the power outage, the CEMS monitoring equipment and communication will be unavailable.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☒ No ☐

Case No.	Date of Action	Final Compliance Date	Explanation
6230-2	July 15, 2024	July 15, 2025	Walnut Creek Energy filed a variance petition for relief from Permit Conditions A195.7 until NOx start-up limits are changed in the facility Title V permit. Variance extension hearing is July 10, 2025 that would extend the variance until July 15, 2026.

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation
6230-6	October 23, 2024	Ongoing	Stipulated Order of Abatement related to testing of Unit 4.

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☐ No ☒

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

The Facility is currently experiencing a power outage affecting the entire plant, which began on June 28, 2025. As a result, the CEMS equipment has not been operational. Rule 218 and Permit Condition D82.1 require that the CEMS monitor CO concentration. Per Rule 218(f)(3) the Facility is requesting a variance from Rule 218 and Permit Condition D82.1 due to the unavailability of CEMS CO monitoring equipment and communication during the power outage.

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).

WCE became aware that it would no longer be in compliance with Rule 218 and Permit Condition D82.1 when the CEMS lost power on June 28, 2025. Rule 218 and Permit Condition D82.1 require continuous monitoring of CO concentrations by the CEMS. The Facility is currently experiencing a power outage affecting the entire plant, which began on that date. As a result, the CEMS equipment has been inoperable.

Upon reviewing the SCAQMD rules, WCE determined that the facility qualifies for the provisions of Rule 2012(c)(2)(D-E), which allow CEMS to be exempt from NOx monitoring requirements—and for NOx emissions to be treated as valid zeros—when the source is not operational for at least 168 consecutive hours. However, no comparable provisions exist in Rule 218 (amended March 5, 2021) for CO monitoring. Therefore, in accordance with Rule 218(f)(3), WCE is requesting a variance from Rule 218 and Permit Condition D82.1 due to the unavailability of the CO CEMS equipment and communication during the power outage.

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

WCE made additional effort to identify a work around with the potential use of generators to maintain power to the CEMS; however, upon further investigation, WCE deemed it could not adequately establish back up generation to ensure reliable operation of each of the CEMS units including the sample lines, air conditioning units, etc., and therefore it was not beneficial to run the generators to maintain power to the CEMS while the rest of the plant is down. WCE can also provide supporting data to demonstrate zero fuel flow as well as the lock-out/tag-out (LOTO) which locks the fuel supply valve.

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: \$ \_\_\_\_\_ unknown \$ for fines \_\_\_\_\_

Number of employees laid off (if any): \_\_\_\_\_ N/A \_\_\_\_\_

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

- WCE is experiencing an unexpected facility-wide power outage that is beyond the facility's reasonable control; if the variance is not granted, WCE would potentially be in violation of its air permit.
- Potential impacts to California's grid and the public could result if CAISO cannot dispatch Units 1-5, which could result in the dispatch of less efficient generation to satisfy electricity demand.

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

Units 1-5 and the associated CEMS equipment will be unavailable for operation during the power outage. Thus, a variance is required for relief from Rule 218 and permit condition D82.1.

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)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A	N/A	N/A	N/A

\* 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.

There will be no excess emissions during the variance period, as Units 1–5 will remain non-operational throughout this time.

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.

There will be no excess emissions during the variance period, as Units 1–5 will remain non-operational throughout this time, and so no additional mitigation measures will be required.

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.**

The Facility can provide fuel records and documentation to the District to confirm zero gas usage and unavailability of power to start/operate the units during the variance period, demonstrating that Units 1-5 will not be operational from June 28, 2025 through July 11, 2025, or shortly thereafter.

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.

Bring Units 1-5 and associated CEMS equipment back into operation and clear the units for service.

24. State the date you are requesting the variance to begin: July 3, 2025; and the date by which you expect to achieve final compliance: July 30, 2025.

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 Increments of Progress here: N/A

25. 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.

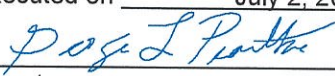
<u>Jason Aspell</u>	Ext. <u>2491</u>
<u>Kevin Orellana</u>	Ext. <u>3492</u>
<u>Madison Burris</u>	Ext. <u>3569</u>
<u>Thomas J Lee</u>	Ext. <u>2412</u>

If the petition was completed by someone other than the petitioner, please provide their name and title below.

<u>Greg Wolffe</u>	<u>Yorke Engineering, LLC</u>	<u>Principal Scientist</u>
Name	Company	Title

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

Executed on July 2, 2025, at Diamond Bar, California

<u></u>	<u>George Piantka</u>
Signature	Print Name

Title: Senior Director, Regulatory Environmental Services

## 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.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	DI	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

- \* (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

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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.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  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements
- \*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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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**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; NOX: 2.3 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, I298.3, I298.9, K67.5

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements
- \*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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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.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

- \* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit  
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(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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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**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; NOX: 2.3 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, I298.5, 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:**

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**

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

**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 =  $K \text{ Cco Fd} [20.9 / (20.9\% - \%O_2 \text{ d})] [(Qg * HHV) / 106]$ ,  
where

$K = 7.267 \text{E-}8 \text{ (lb/scf)/ppm}$

$\text{Cco} = \text{CO concentration, ppm}$

$\text{Fd} = 8710 \text{ dscf/MMBTU natural gas}$

$\%O_2 \text{ d} = \text{Hourly ave \% by volume } O_2, \text{ dry corresponding to } \text{Cco}$

$Qg = \text{Fuel gas usage during the hour, scf/hr}$

$\text{HHV} = \text{Gross high heating value of fuel gas, BTU/scf}$

**[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: