

MFCO 3/26/26

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

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
CLERK OF THE BOARD
2026 FEB 13 AM 9:17

PETITIONER: CANYON POWER PLANT (CITY OF ANAHEIM)

CASE NO: Case 6264-2

FACILITY ID: 153992

FACILITY ADDRESS: 3071 E. Miraloma Avenue

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

CITY, STATE, ZIP: Anaheim, CA 92806

1. TYPE OF MODIFICATION REQUESTED

- (a) **MODIFICATION/EXTENSION OF A FINAL COMPLIANCE DATE:** If you are operating under a variance and will not be in full compliance by the final compliance date, you may request an extension of the variance and a modification of the final compliance date. **A petition requesting such an extension must be filed at least 45 days prior to the existing final compliance date in order to meet the legal notice requirement.** *(Hearing will be held approximately 45 days from date of filing--30-day published notice required.)*
- (b) **MODIFICATION OF VARIANCE CONDITIONS:** If you are unable to comply with one or more conditions of an existing variance, you may request a modification of variance conditions. *(Hearing will be held approximately 21 days from date of filing--10-day published notice required)*
- (c) **MODIFICATION OF INCREMENTS OF PROGRESS:** If you are unable to comply with one or more increments of progress of an existing variance and additional time is required, you may request a modification of those increments of progress. *(Hearing will be held approximately 21 days from date of filing--10-day published notice required.)*
- (1) **INTERIM AUTHORIZATION:** If compliance with an increment of progress cannot be achieved and you are unable to notify the Hearing Board at least 21 days in advance in order to schedule a noticed hearing, the Board can consider granting **one** extension of the increments of progress (interim authorization). **However**, an interim authorization cannot be granted: (1) for more than 30 days; or (2) to extend a final compliance date of an existing variance. *(Hearing will be held approximately 2 working days from date of filing or the next available hearing date thereafter.)*
- (d) OTHER: Specify:

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

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).

Ron Hoffard – Generation Plant Manager

Cesar Santana – Project Engineer

Canyon Power Plant

Montrose Environmental Solutions, Inc.

3071 E. Miraloma Avenue

1631 E. St Andrew Place

Anaheim, CA Zip 92806

Santa Ana, CA Zip 92705

☎ (714) 765-4536 Ext.

☎ (949) 988-4279 Ext.

Fax ()

Fax ()

E-mail rhoffard@anaheim.net

E-mail cesarsantana@montrose-env.com

3. List the equipment and/or activity that are the subject of this petition, if different from the existing variance. **(Attach copy of last minute order regarding this variance)**

Equipment/Activity	Application/ Permit No.	RECLAIM Permit/Device No.	Date Application/Plan Denied (if relevant, attach copy of denial letter)
Gas Turbine No. 1		D1	N/A
CO Oxidation Catalyst, No. 1		C3	N/A

4. List all District rules, and/or permit conditions from which you are requesting variance relief, if different from the existing variance. *Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate the subject equipment **only if you are adding** a request for relief from permit conditions. If RECLAIM or Title V facility, attach only the relevant sections of the Facility Permit (for example, showing the equipment or process and conditions that are the subject of this petition).*

Rules	Explanation
Permit Condition D29.3	SOx, VOC, and PM testing must be conducted once every three years. This testing is used to demonstrate compliance with BACT requirements. The facility is unable to meet testing requirements while the turbine is out for repair, and therefore cannot meet Permit Condition D29.3.
Rule 203(b)	Equipment cannot be operated contrary to permit conditions. The facility is unable to meet testing requirements while the turbine is out for repair, and therefore cannot be fully in compliance with Rule 203.
Rule 2001(j)	Facilities in the RECLAIM program must comply with all provisions of District rules and regulations. The facility is unable to meet testing requirements while the turbine is out for repair, and therefore cannot

	be fully in compliance with Rule 2001.
Rule 3002(c)(1)	All equipment at a Title V facility must be in compliance with all terms, requirements, and conditions of the Title V permit. The facility is unable to meet testing requirements while the turbine is out for repair, and therefore cannot be fully in compliance with Rule 3002.
Rule 218 (c)(1)(B)(i)	Operations and maintenance of the certified CEMS must be in accordance with the requirements of Rule 218.1 Sections b and d. The facility is unable to meet testing requirements in Rule 218.1 Section b with the turbine is out for repair, and therefore cannot be fully in compliance with Rule 218.
Rule 218.1 (b)(4)(B)	Facilities must complete a System Bias Test every 12 months. The facility is unable to meet testing requirements while the turbine is out for repair, and therefore cannot be fully in compliance with Rule 218.1.
Rule 218.1 (b)(4)(C)	Facilities must complete a Relative Accuracy Test Audit (RATA) every 12 months. The facility is unable to meet testing requirements for CO while the turbine is out for repair, and therefore cannot be fully in compliance with Rule 218.1.

5. Explain the steps taken since the last hearing to achieve compliance, including how you have met each of your existing variance conditions and/or increments of progress.

- 10/3/25: Permit Modification application was submitted within 30 days of Variance Order 6264-2
- 1/13/26: The repair depot notified the facility that additional replacements to the damaged blades and nozzles were needed, pushing the expected turbine return date to May.
- 2/3/26: During a call with the repair depot, a tentative schedule for assembly and testing at the depot to be completed in April. Based on this schedule, the turbine is expected to be back onsite in early May.

6. When did you first become aware that you would not be able to comply with the existing variance?

Date: 1/13/26

7. What part(s) of the existing variance are you unable to comply with (final compliance date, specific increments of progress, and/or conditions)? For each part with which you cannot comply, provide an explanation.

City of Anaheim cannot comply with the final compliance date of March 31, 2026 and with the conditions listed below. For all conditions listed, City of Anaheim cannot comply within the final compliance date as the turbine repairs will not be completed in time. City of Anaheim expects to be able to comply with all conditions with an extended compliance date.

2. Notification of progress to South Coast AQMD

3. Conduct Triennial Testing

4. Notify South Coast AQMD prior to starting Triennial Source Test

5. Submit a complete source test report showing preliminary compliance with Triennial Source Test to South Coast AQMD

6. Ensure NOx and CO CEMS is operation at least twenty four (24) hours prior to restart of equipment of Turbine No. 1.

7. Perform gas analysis on the NOx and CO monitor offline prior to restarting Turbine No. 1.

8. Conduct a RATA and bias test.

11. Notify the Clerk of the Hearing Board when final compliance is achieved.

8. 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 and/or modifications or process changes to be made, a list of the dates by which the actions will be completed, and an estimate of total costs.

Turbine No. 1 is now expected to be repaired and back onsite in May 2026. The triennial compliance testing will be completed shortly after it is returned to services as directed by scheduling. Notification requirements will be completed throughout this process. The source test report and final notification of compliance will be submitted in July 2026. Total repair costs are estimated to be \$10,237,608, including a contingency for any work not yet known.

9. State the date by which you expect to achieve final compliance: July 31, 2026

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.

Example:

- Permit application(s) will be submitted to the District by June 1, 2001.
- Contracts for the purchase of emission control systems will be awarded by August 1, 2001.
- On-site construction will be completed by September 8, 2001.

List Increments of Progress here:

- May 2026: Repairs are completed and Turbine No. 1 is back onsite
- June 2026: Source testing is completed and corresponding notifications are sent.
- July 2026: Source test report is completed and final compliance is achieved.

10. 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, go to No. 11.

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: N/A %

11. Show calculations used to estimate quantities in No. 10, or explain why there will be no excess emissions.

During the time the turbine is absent, there will be no excess emissions. When the turbine is returned and reinstalled, the turbine will be tested prior to placing it in service. The turbine will not operate until testing is done, so there will be no excess emissions.

12. Explain how you plan to reduce (mitigate) excess emissions to the maximum extent feasible. If no excess emissions, skip to No. 13.

There will be no need to mitigate excess emissions since there will be no excess emissions during the variance period. When the turbine is returned and reinstalled, the turbine will be tested prior to placing it in service. The turbine will not operate until testing is done, so there will be no excess emissions.

13. Explain how you will monitor or quantify emission levels from the subject equipment or activity during the variance period and make such records available to the District. **Any proposed monitoring does not relieve RECLAIM facilities from missing data requirements.**

There will be no need to quantify emission levels since there will be no emissions from Turbine No. 1 during the variance period.

14. What would be the harm to your business if the variance were not modified/extended as requested?

Economic losses: \$ N/A 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).

The turbine will not be operational during the extended variance period, so there will be no economic losses resulting from the variance not being granted other than the potential penalties that may arise from any Notice of Violation issued for the same reasons that required the variance (triennial testing schedule being missed due to the non-operational turbine or physical absence of the turbine).

15. 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.

Karin Manwaring Ext. 2236

Thomas Lee Ext. 2412

Chris Perri Ext. 2696

16. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six (6) months? No Yes

Date of Complaint	Number of Complainant(s)	Nature of Complaint

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 FEBRUARY 12, 2026, at ANAHEIM, California

R Hoffard
Signature

Ron Hoffard
Print Name

Generation Plant Manager
Title

17. **SMALL BUSINESS and TABLE III SCHEDULE A FEES:** To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration Regarding Reduced Fee Eligibility

1. The petitioner is

- a) an individual, or
- b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is

- a) a business that meets the following definition of Small Business as set forth in District Rule 102:
SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:

- (a) the number of employees is 10 or less; **AND**
- (b) the total gross annual receipts are \$500,000 or less or
- (iii) the facility is a not-for-profit training center.

-OR-

- b) an entity with total gross annual receipts of \$500,000 or less.

3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, at _____,
California

Signature

Print Name

Position with Company

