SV 09/18/25

SOUTH COAST AQMD
CLERK OF THE BOARDS
2025 SEP -4 PM 3:33

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

PETITIONER: LOS ANGELES DEPARTMENT OF WATER AND POWER CASE NO: 1263-82

FACILITY ID: 800193

FACILITY ADDRESS: 11801 Sheldon Street

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

City, State, Zip: Sun Valley, California 91352

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

Andrea Villarin
Manager of Air Quality
111 N. Hope Street, Room 1050
Los Angeles, CA *Zip* 90012
☎ (213) 367-0409 *Ext.*
Fax (213) 367-4710
E-mail andrea.villarin@ladwp.com

Nicholas Karno
Deputy City Attorney
221 N. Figueroa Street, 10th Floor
Los Angeles, CA *Zip* 90012
☎ (213) 367-4530 *Ext.*
Fax (213) 367-4588
E-mail nick.karno@ladwp.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)

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]

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

Los Angeles Department of Water and Power (LADWP)

LADWP is the largest municipal utility in the nation and supplies water and electric services to 3.8 million residents and businesses in the City of Los Angeles. As a vertically integrated power system, LADWP both owns and operates the majority of its generation, transmission, and distribution systems. A five-member Board of Water & Power Commissioners is appointed by the Mayor and establishes policy. Together, LADWP and the City of Los Angeles have been at the forefront of California utilities in adopting aggressive clean energy initiatives. To that end, LADWP has set goals to meet renewable energy targets, while at the same time maintaining a reliable and cost-effective power supply for customers.

Valley Generating Station

Located in Sun Valley, LADWP's Valley Generating Station (VGS) consists of one simple cycle combustion turbine (Unit 5) and two combined cycle combustion turbines (Units 6 and 7) that work in tandem with one steam turbine generator (Unit 8). These units generate a total of 596 MW (gross). VGS is capable of providing electricity to over 464,000 homes. Units 6 and 7, the subject of this petition, are both 164.2 MW (gross) natural gas-fired turbines equipped with Selective Catalytic Reduction (SCR) for NOx control and an oxidation catalyst for CO and VOC control. Unit 8, the steam turbine generator, has a gross rating of 220.5 MW. The emissions of Units 6 and 7 are monitored by a SCAQMD- and EPA-certified Continuous Emissions Monitoring Systems (CEMS).

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, 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)*
Combustion Turbine Unit 6	588170	D143	N/A
Combustion Turbine Unit 7	588171	D152	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.

Listed under Section D of VGS' Title V Permit to Operate, Units 6 and 7 are GE Power Systems Model 7241FA combined cycle natural gas turbines.

Units 6 and 7 operate in combined cycle mode with Unit 8, a GE-D11 steam turbine. Together, these units are a vital component in LADWP's portfolio of in-basin generating facilities, because they provide a reliable and economical way to integrate a diversified energy portfolio while ensuring voltage support and grid reliability for the LA basin. Units 6 and 7, together with their combined cycle steam turbine Unit 8, generate 549 MW (gross). Because of their higher efficiency in combined cycle operations, these units run as baseload units and are critical to the stability of the entire LADWP power system.

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

If yes, how often: Annually Date of last maintenance and/or inspection: 3/9/2025

Describe the maintenance and/or inspection that was performed.

U6 Scheduled Inspection and Repair (SIR): 01/26/25 – 03/09/25

- Borescope inspection
- Turbine inlet and exhaust inspection
- HRSG and Steam Systems Inspection and repairs
- NOx and CO catalyst Inspection
- Balance of Plant Equipment Inspection and repair
- Generator inspection and repair

U7 Scheduled Inspection and Repair: 01/04/25 – 06/01/25

- Gas Turbine/Generator Major Outage:
- Replace generator field rotor
- Replace generator seals, oil deflectors, and bearings
- Replaced gas turbine rotor
- Replace gas turbine seals, oil deflectors, and bearings
- Replace combustion hardware (fuel nozzles, end caps, transition pieces, and combustion liners)
- Replace turbine hardware (Stages 1, 2 and 3 buckets, nozzles, and shroud blocks)
- Inspect and repair exhaust diffuser

U8 Scheduled Inspection and Repair: 01/26/25 – 03/09/25

- Main Steam Stop and Control Valve Inspection and Repair (every 4 years)
- Intercept Reheat Stop and Control Valve inspection and repair (every 4 years)
- Condenser inspection and repair
- Generator inspection and repair

9. List all District rules, and/or permit conditions 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, Example #2).

Rule	Explanation
Permit Condition D82.4 (**Exhibit 1**) "The CEMS shall be installed in accordance with an approved AQMD Rule 218 CEMS plan application…The CEMS shall be installed to measure CO concentration over a 15-minute averaging time period."	The carbon monoxide (CO) Relative Accuracy Test Audit (RATA) is due by the end of the third quarter on September 30, 2025. The initial certification letter for Unit 7's CO CEMS was issued on March 28, 2018. Rule 218.1, Attachment A, Section C requires annual RATA assessments to be completed within six months of the end of the calendar quarter in which the CEMS was originally certified. Since the CEMS was initially certified in the first quarter, the annual RATA would need to be completed by end of September 2025. The CO RATA must be performed while the unit is operating. Due to a seal oil leak on Unit 8, it cannot be operated and has been offline since 8/24/2025. Since Unit 6 and 7 are tied to the operation of Unit 8 in combined cycle mode, these two units cannot be operated independently. For this reason, Units 6 and 7 will not be able to complete the CO RATA by the 9/30/2025 due date, and therefore, will not be in compliance with Title V permit conditions and SCAQMD rules.

Rule	Explanation
Rule 203(b) "The equipment shall not be operated contrary to the conditions specified in the permit to operate."	
Rule 218.1, Attachment A, Section C "For each CEMS, perform the aforementioned performance requirements once a year thereafter. These annual assessments shall be completed within six months of the end of the calendar quarter in which the CEMS was originally certified."	
Rule 218 (b)(2) "The owner or operator of any equipment subject to this Rule shall provide, properly install, operate, and maintain in calibration and good working order a certified CEMS to measure the concentration and/or emission rates, as applicable, of air contaminants and diluent gases, flow rates, and other required parameters. The owner or operator shall also provide the necessary records and other data necessary to calculate air contaminant emission rates or concentrations, as specified in Rule 218, Sections (e) and (f)."	
Rule 2004(f)(1) "The Facility Permit holder shall, at all times, comply with all rules and permit conditions applicable to the facility, as specified in the Facility Permit."	
Rule 3002(c)(1) "A person shall construct and operate a Title V facility and all equipment located at a Title V facility in compliance with all terms, requirements, and conditions specified in the Title V permit at all times."	

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

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

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 ☒

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 ☒

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s):

The Unit 8 generator compartment experienced a high-high alarm indicating the presence of liquid within the generator. This condition rendered the steam turbine inoperable, as no liquid should be present in that compartment. The liquid was identified as oil, which is used to seal out hydrogen gas that is essential for proper steam turbine operation. Until repairs are completed, the Unit 8 steam turbine cannot be operated safely or reliably.

Completion of the CO RATA normally consists of the operation of Units 6 and 7 in combined-cycle mode, which is dependent on the availability of the Unit 8 steam turbine. At this facility, combined-cycle mode consists of operation of one or both combustion turbines and the steam turbine in operation (Unit 8). However, the necessary repairs to the Unit 8 steam turbine are projected to extend into the fourth quarter of 2025, which is beyond the current CO RATA due date of September 30, 2025. As a result, compliance with the required testing deadline is not possible with Unit 8 currently expected to return to service as early as October 2025.

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)?

On August 25, 2025, the facility received a high-high alarm indicating liquid within the turbine compartment. Operations verified the alarm and discovered seal leaks caused oil to breakthrough into the generator compartment. The situation was assessed and the status of the Unit 8 leak was estimated to require about five weeks to repair which would extend the unit availability beyond the 9/30/2025 CO RATA deadline. Once this determination was made, the CO RATA tests that were originally scheduled for September 3, 2025 (Unit 6 pre-notification # 850878) and September 4, 2025 (Unit 7 prenotification #850879) were cancelled. As a result, the CO RATA tests will have to be performed after the third quarter deadline.

16. What actions have you taken since that time to achieve compliance?

Listed below are the actions that the facility has completed and plans to perform in order to bring the units back in service and in compliance:

Completed:

- Open inspection ports and borescope generator (Oil residue was found primarily on turbine end (TE) and collector end (CE) TE/CE. Stator core appears dry as seen through inspection windows).
- Remove and inspect TE/CE hydrogen seals and oil deflectors (No abnormal damage was found on hydrogen seals).
- Inspect stator connection leads and terminals compartment (Oil was found in compartment)

Planned:

- Perform baseline electrical testing.
- Clean and wipe connection leads and terminal compartment.
- Remove and clean hydrogen coolers.
- Remove and clean upper End Bells.
- Remove and clean Inner End Shields.
- Clean and wipe End Windings.
- Clean and wipe generator belly and walls.
- Pump and clean oil from generator low point drains.
- Electrically re-test generator after cleaning.
- If electrical results are good, reassemble generator and place unit back in-service.

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: $TBD

Number of employees laid off (if any): None

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

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

LADWP could be subject to a Notice of Violation for the entire duration that the CO RATA is not successfully performed. LADWP's ratepayers would then bear the expense of any resulting fines and penalties if the variance is not granted.

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

Units 6, 7, and 8 have been offline since August 25, 2025. Despite the temporary termination of the units' operation, LADWP will still require a variance for not meeting the CO RATA deadline. While this petition is seeking relief from complying with the CO RATA due date of September 30, 2025, LADWP recognizes that Units 6, 7, and 8 must be brought back to service as soon as practicable before the CO RATA can be conducted.

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, 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)
None	N/A	N/A	N/A

* Column A minus Column B = Column C

Excess Opacity: 0 %

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 since the units are not operational and not producing any emissions.

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.

N/A

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.**

During the variance period, LADWP will continue to monitor and record emissions through CEMS, which will remain operational during the repairs.

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.

LADWP intends to achieve compliance with Rule 218.1 by completing the Unit 8 repairs and bringing all three units back online as soon as practicable so that the CO RATAs can be conducted successfully and within the

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

time period granted by the variance.

24. State the date by which you expect to achieve final compliance: December 31, 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, 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.

Kevin Orellana Ext. 3492

Ext.

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 September 4, 2025, at Los Angeles, California

Signature

Katherine Rubin
Print Name

Director of Corporate Environmental Affairs
Title

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

EXHIBIT 1

(Condition 82.4 From Title V Permit)

FACILITY PERMIT TO OPERATE
LA CITY, DWP VALLEY GENERATING STATION

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: POWER GENERATION					
GAS TURBINE, UNIT NO. 6, COMBINED CYCLE, DIESEL FUEL, NATURAL GAS, GENERAL ELECTRIC, MODEL 7241FA, 1,805 MMBTU/HR HHV AT 22 DEG F AMBIENT TEMPERATURE, WITH LOW NOX BURNER, WATER INJECTION WITH A/N: 640093	D143	C148 C149 S151	NOX: MAJOR SOURCE**	CO: 6 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: 2.5 PPMV (4) [RULE 1703 - PSD Analysis, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 19.32 LBS/HR (5) [RULE 1703(a)(3) PSD Analysis, 10-7-1988]; NOX: 26 LBS/1000 GAL DIESEL (1) [RULE 2012, 2-5-2016]; NOX: 42 PPMV DIESEL (4) [RULE 1703 - PSD Analysis, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 109.4 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 3-6-1981]; NOX: 114.7 PPMV DIESEL (8) [40CFR 60 Subpart GG, 3-6-1981]; PM: 0.01 GRAINS/SCF (5B) [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, 10-8-1976; *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*]	A63.3, A99.5, A99.6, A99.7, A195.4, A195.5, A195.6, A327.1, A433.1, B75.3, D29.4, D29.6, D29.8, D82.4, D82.5, D371.2, D372.1, E57.1, E193.3, E193.4, E193.5, E193.8, K67.6, K171.1

* (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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LA CITY, DWP VALLEY GENERATING STATION

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: POWER GENERATION					
GENERATOR, 164.2 MW GROSS AT 64 DEG F AMBIENT TEMPERATURE GENERATOR, HEAT RECOVERY STEAM STEAM TURBINE, STEAM, COMMON WITH GAS TURBINE NO. 7, 220.5 MW GROSS AT 64 DEF F					

* (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.)
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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: POWER GENERATION					
BURNER, DUCT, DERATED TO 139 MMBTU/HR HHV, NATURAL GAS, LOCATED IN THE HRSG OF TURBINE NO. 6 A/N: 640093	D147		NOX: MAJOR SOURCE**	**CO: 6 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: 2.5 PPMV (4) [RULE 1703 - PSD Analysis, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 19.32 LBS/HR (5) [RULE 1703 - PSD Analysis, 10-7-1988]; NOX: 109.4 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 3-6-1981]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976;** *RULE 475, 8-7-1978*]; **PM: 11 LBS/HR (5B) [RULE 475, 10-8-1976;** *RULE 475, 8-7-1978*]; **PM10: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; 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*]	A63.3, A99.5, A99.6, A195.4, A195.5, A195.6, A327.1, A433.1, C1.9, D29.4, D29.6, D29.8, D82.4, D82.5, D371.2, D372.1, E57.1, E193.3, E193.4, E193.5, K67.6
CO OXIDATION CATALYST, SERVING TURBINE NO. 6, ENGELHARD, HEIGHT 61 FT X LENGTH 26 FT X WIDTH 4 FT; WITH 6344 CU FT OF CATALYST VOLUME A/N: 640094	C148	D143			

* (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

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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
Process 1: POWER GENERATION					
SELECTIVE CATALYTIC REDUCTION, SERVING TURBINE NO. 6, ENGELHARD, TITANIUM-VANADIUM, WITH 7930 CU FT OF CATALYST VOLUME, WIDTH: 5 FT ; HEIGHT: 61 FT ; LENGTH: 26 FT WITH A/N: 640094 AMMONIA INJECTION, INJECTION GRID	C149	D143		NH3: 5 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; *RULE 1303(a)(1)-BACT, 12-6-2002*]	A195.12, D12.7, D12.8, D12.9, D29.5, E73.2, E179.3, E179.4, E193.3, E193.9
STACK, SERVING TURBINE NO. 6, HEIGHT: 140 FT ; DIAMETER: 19 FT A/N: 640093	S151	D143			

* (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

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Process 1: POWER GENERATION					
GAS TURBINE, UNIT NO. 7, COMBINED CYCLE, DIESEL FUEL, NATURAL GAS, GENERAL ELECTRIC, MODEL 7241FA, 1805 MMBTU/HR HHV AT 22 DEG F AMBIENT TEMPERATURE, WITH LOW NOX BURNER, WATER INJECTION WITH A/N: 640096 GENERATOR, 164.2 MW GROSS AT 64 DEG F	D152	C156 C157 S159	NOX: MAJOR SOURCE**	**CO: 6 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996;** *RULE 1303(a)(1)-BACT, 12-6-2002*]; **CO: 2000 PPMV (1) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV (4) [RULE 1703 - PSD Analysis, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 19.32 LBS/HR (5) [RULE 1703 - PSD Analysis, 10-7-1988]; NOX: 26 LBS/1000 GAL DIESEL (1) [RULE 2012, 2-5-2016]; NOX: 42 PPMV DIESEL (4) [RULE 1703 - PSD Analysis, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 109.4 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 3-6-1981]; NOX: 114.7 PPMV DIESEL (8) [40CFR 60 Subpart GG, 3-6-1981]; PM: 0.01 GRAINS/SCF (5B) [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 (5A) [RULE 475, 10-8-1976;** *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*]	A63.5, A99.5, A99.6, A99.7, A195.4, A195.5, A195.6, A327.1, A433.1, B75.3, D29.4, D29.6, D29.8, D82.4, D82.5, D371.2, D372.1, E57.1, E193.3, E193.4, E193.5, E193.8, K67.6, K171.1

* (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
Process 1: POWER GENERATION					
GENERATOR, HEAT RECOVERY STEAM STEAM TURBINE, STEAM, COMMON WITH GAS TURBINE NO. 6, 220.5 MW GROSS AT 64 DEG F					
BURNER, DUCT, DERATED TO 139 MMBTU/HR HHV, NATURAL GAS, LOCATED IN THE HRSG OF TURBINE NO. 7 A/N: 640096	D160		NOX: MAJOR SOURCE**	CO: 6 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: 2.5 PPMV (4) [RULE 1703 - PSD Analysis, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 19.32 LBS/HR (5) [RULE 1703 - PSD Analysis, 10-7-1988]; NOX: 109.4 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 3-6-1981]; 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 (5B) [RULE 475, 10-8-1976; *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*]	A63.5, A99.5, A99.6, A195.4, A195.5, A195.6, A327.1, A433.1, C1.9, D29.4, D29.6, D29.8, D82.4, D82.5, D371.2, D372.1, E57.1, E193.3, E193.4, E193.5, K67.6

* (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
LA CITY, DWP VALLEY GENERATING STATION

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: POWER GENERATION					
CO OXIDATION CATALYST, SERVING TURBINE NO. 7, ENGELHARD, HEIGHT 61 FT X LENGTH 26 FT X WIDTH 4 FT, WITH 6344 CU FT OF CATALYST VOLUME A/N: 640097	C156	D152			
SELECTIVE CATALYTIC REDUCTION, SERVING TURBINE NO. 7, ENGELHARD, TITANIUM-VANADIUM, 7930 CU FT CATALYST VOLUME, WIDTH: 5 FT ; HEIGHT: 61 FT ; LENGTH: 26 FT WITH A/N: 640097 AMMONIA INJECTION, INJECTION GRID	C157	D152		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; *RULE 1303(a)(1) -BACT, 12-6-2002*]	A195.12, D12.7, D12.8, D12.9, D29.5, E73.2, E179.3, E179.4, E193.3, E193.9
STACK, SERVING TURBINE NO. 7, HEIGHT: 140 FT ; DIAMETER: 19 FT A/N: 640096	S159	D152			
Process 2: PETROLEUM STORAGE					
System 2: Aboveground Tank					
STORAGE TANK, PONTOON, FIXED ROOF, INTERNAL FLOATING ROOF, DIESEL FUEL, 60300 BBL; DIAMETER: 99 FT ; HEIGHT: 48 FT WITH A/N: 594094 FLOATING ROOF, PONTOON, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D161				B22.1, B59.1, C1.6, H23.1, K67.7

* (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.