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8 **BEFORE THE HEARING BOARD OF THE**
9 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

10 In the Matter of

11 SOUTH COAST AIR QUALITY
12 MANAGEMENT DISTRICT,

13 Petitioner,

14 vs.

15 SOUTHERN CALIFORNIA EDISON –
16 PEBBLY BEACH GENERATING STATION

17 Facility ID No. 4477

18 Respondent.
19

CASE NO. 1262-115

**DECLARATION OF KRYSTAL
STANGELAND IN SUPPORT OF
STATUS UPDATE AND
MODIFICATION OF ORDER FOR
ABATEMENT**

District Rule 1470

Date: May 27, 2025

Time: 9:30 a.m.

Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

20
21 I, Krystal Stangelend, declare:

22 1. I am employed by Southern California Edison Company (SCE). I am a Senior Project
23 Manager for Catalina Operations & Planning within SCE's Generation organizational unit. I have
24 had this role since 2023. I oversee the Pebbly Beach Generating Station (PBGS) Repower Project
25 from a program management perspective. I have worked on the PBGS Repower Project since
26 2023.
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1 2. In 2007, I earned a bachelor's degree in business administration from California State
2 University Long Beach. In 2013, I earned a master's degree in business administration from the
3 University of La Verne. I have been with SCE since 2011. My current responsibilities at SCE
4 include portfolio management and strategic initiatives for Catalina Island's electric grid. Before
5 joining SCE, I worked at Raytheon Company starting in 2007, where I managed Department of
6 Defense contracts.

7 3. On February 13, 2025, the South Coast Air Quality Management District (South Coast
8 AQMD) notified SCE that the Permit to Construct (PTC) had been issued for the replacement of
9 PBGS Units 8, 10, and 15.¹ The PTC identifies Unit 15's replacement as Cummins Model No.
10 QSK60-G17 (see Section H, p. 2), which SCE had specified in its PTC application in January
11 2022.

12 4. In November 2024, SCE asked Cummins to submit a direct-award proposal for Model No.
13 QSK60-G17. Cummins responded that it had discontinued its line of U.S. EPA Tier 4 Final-
14 certified generators (which included Model No. QSK60-G17) and they were no longer available
15 for sale.

16 5. In December 2024, SCE evaluated an initial pool of 19 potential suppliers for a Unit 15
17 replacement but only seven suppliers indicated they might be able to meet the technical
18 requirements. On December 19, 2024, SCE issued a Request for Proposals (RFP) to those seven
19 suppliers. Cummins sent a letter to SCE dated December 20, 2024 confirming the discontinuation
20 of the Tier 4 Final product line.² SCE received zero bids when the RFP closed on January 30,
21 2025.

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27 ¹ SCE is awaiting the issuance of a Coastal Development Permit from the California Coastal Commission. A true and
correct copy of the PTC is attached hereto as Attachment A.

28 ² A true and correct copy of the letter is attached hereto as Attachment B.

1 6. SCE and Cummins are continuing discussions about a possible substitute for Model No.
2 QSK60-G17 with an aftertreatment system that could meet the emission requirements in Rules
3 1135 and 1470. If a suitable substitute is identified, SCE expects it will need to apply for an
4 amended PTC, which could cause a significant delay depending on how much the substitute
5 differs from Model No. QSK60-G17.

6 7. Operation under the proposed order is not expected to result in a violation of Health and
7 Safety Code Section 41700.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct. Executed on May 16, 2025, at West Covina, California.

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13 _____
14 Krystal Stangeland
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Attachment A

Permit to Construct Units 8, 10, 15



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

February 13, 2025

Casey Scott
Senior Advisor, Air Quality
P.O. Box 5085, Attn: Air Quality
Rosemead, CA 91770

SUBJECT: Title V/RECLAIM Permit Revision No. 58
Southern California Edison, Pebbly Beach (ID 4477)

Dear Mr. Scott:

Please find enclosed the revised Title V/RECLAIM permit for equipment located at 1 Pebbly Beach Road, Avalon, CA 90704. The enclosed permit incorporates the approval of the significant revision requested in your Application No. 628924 for the addition of the 3 new replacement engines and their emissions control systems. The proposed permit revision was submitted to U.S. EPA for a 45-day review on October 29, 2024, and the 30 day public notice was published on November 4, 2024 with the local notice distributed to addresses within ¼ mile on December 12, 2024. During the review period, we provided U.S. EPA with some clarifying information in response to their inquiry, after which U.S. EPA ended their review on November 6, 2024. No comments from the public were received.

Section H of the revised permit reflects the following:

Equipment	Device ID	Appl No.	Description
Engine/DPF/Stack No. 1	D90/S95	628930	Permit to Construct of the new engine
SCR No. 1	C93/C94	634994	Permit to Construct of the new SCR Catalyst
Engine/DPF/Stack No. 2	D96/S101	628929	Permit to Construct of the new engine
SCR No. 2	C99/C100	634995	Permit to Construct of the new SCR Catalyst
Engine/DPF/Stack No. 3	D102/S107	646016	Permit to Construct of the new engine
SCR No. 3	C105/C106	646017	Permit to Construct of the new SCR Catalyst

Please review the attached Section H carefully. Insert the enclosed section into your Title V/RECLAIM Facility Permit and discard the earlier version. If you determine there are administrative errors or if you have questions concerning changes to your permit, please contact Mr. Chris Perri at (909) 396-2696 or cperri@aqmd.gov within 30 days of the receipt of your permit.

Sincerely,

Shannon Lee

Shannon Lee, P.E.
Senior Air Quality Engineering Manager
Engineering and Permitting
Mechanical/Chemical/Energy/Terminals

SL:LC:OT:cgp
CC: Gerardo Rios, U.S. EPA Region IX
Permit File, A/N 628930



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Title Page
Facility ID: 004477
Revision #: 58
Date: February 13, 2025

FACILITY PERMIT TO OPERATE

**SO CAL EDISON CO
1 PEBBLY BEACH RD
AVALON, CA 90704**

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 Natri
Executive Officer

By Shannon Lee for
Jason Aspell
Deputy Executive Officer
Engineering and Permitting



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

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FACILITY PERMIT TO OPERATE SO CAL EDISON CO

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
Process 1: INTERNAL COMBUSTION					
System 1: POWER GENERATION					
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY, UNIT NO. 15, DIESEL FUEL, EMD, MODEL 16-710G4B, TWO CYCLE, WITH AFTERCOOLER, TURBOCHARGER, 3900 HP WITH A/N: 636681 Permit to Construct Issued: 06/15/22	D42		NOX: MAJOR SOURCE**	CO: 23 PPMV DIESEL (8) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; 40CFR 63 Subpart ZZZZ, 1-30-2013]; CO: 250 PPMV DIESEL (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]; NOX: 2.13 LBS/NET MWH DIESEL (5) [RULE 2009.1, 5-11-2001]; NOX: 51 PPMV DIESEL (4) [RULE 2005, 10-15-1993; RULE 2005, 4-9-1999]; PM: (9) [RULE 404 2-7-1986]; ROG: 30 PPMV DIESEL (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]	A63.1, A63.2, A99.1, A195.7, A195.9, A195.10, D29.2, D29.3, D29.5, D29.6, D323.2, E73.1, E193.1, E448.1, H23.5, K40.2, K171.1
GENERATOR, 2800 KW					
STACK, UNIT NO. 15 A/N: 636681 Permit to Construct Issued: 06/15/22	S89				

- * (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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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, UNIT NO. 1, DIESEL FUEL, CUMMINS, MODEL QSK60-G17, 16 CYLINDERS, 4 CYCLE TURBOCHARGED, AFTERCOOLED, EXHAUST HEATER, 2655 BHP WITH A/N: 628930 Permit to Construct Issued: 02/13/25	D90	C93 C94	NOX: MAJOR SOURCE**	CO: 2.6 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; CO: 140 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 250 PPMV DIESEL (5) [RULE 1135, 10-4-2024]; NOX: 0.5 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; NOX: 31.76 LBS/1000 GAL DIESEL (2) [RULE 2012, 2-5-2016; RULE 2012, 11-3-2023]; NOX: 45 PPMV DIESEL (5) [RULE 1135, 10-4-2024]; NOX: 45 PPMV DIESEL (4) [RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.008 LBS/MMBTU DIESEL (5) [RULE 1135, 10-4-2024]; PM: 0.022 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; VOC: 0.14 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; VOC: 30 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 30 PPMV DIESEL (5) [RULE 1135, 10-4-2024]	A63.3, A99.2, A195.11, A195.12, A195.13, B59.1, C1.5, D12.8, D12.9, D29.8, D29.9, D82.1, D323.2, E57.2, E193.4, E193.5, I297.1, K67.8

- * (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
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(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements
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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
DIESEL PARTICULATE FILTER, CUMMINS, WITH A DATA LOGGING AND ALARM SYSTEM GENERATOR, 1825 KW					
SELECTIVE CATALYTIC REDUCTION, BED 1, VANADIUM/TUNGSTEN, CUMMINS, MODEL CA452, WITH A 230 GALLON DIESEL EXHAUST FLUID TANK (SERVING BED 1 AND BED 2), 530 CU.FT.; WIDTH: 10 FT 5 IN; HEIGHT: 4 FT 2 IN; LENGTH: 15 FT 3 IN A/N: 634994 Permit to Construct Issued: 02/13/25	C93	D90		NH3: 10 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.14, D12.10, D12.11, D12.12, E193.6
SELECTIVE CATALYTIC REDUCTION, BED 2, VANADIUM/TUNGSTEN, CUMMINS, MODEL CA452, 530 CU.FT.; WIDTH: 10 FT 5 IN; HEIGHT: 4 FT 2 IN; LENGTH: 15 FT 3 IN A/N: 634994 Permit to Construct Issued: 02/13/25	C94	D90		NH3: 10 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.14, D12.10, D12.11, D12.12, E193.6
STACK, UNIT #1, DUAL EXHAUST DUCTING WITH 1 SCR BED IN EACH DUCT, SPLIT DUCTING COMBINED INTO ONE EXHAUST STACK, HEIGHT: 38 FT 6 IN; DIAMETER: 2 FT A/N: 628930 Permit to Construct Issued: 02/13/25	S95				

- * (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
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Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, UNIT NO. 2, DIESEL FUEL, CUMMINS, MODEL QSK60-G17, 16 CYLINDERS, 4 CYCLE, TURBOCHARGED, AFTERCOOLED, EXHAUST HEATER, 2655 BHP WITH A/N: 628929 Permit to Construct Issued: 02/13/25	D96	C99 C100	NOX: MAJOR SOURCE**	CO: 2.6 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart IIII, 1-24-2023]; CO: 140 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 250 PPMV DIESEL (5) [RULE 1135, 10-4-2024]; NOX: 0.5 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart IIII, 1-24-2023]; NOX: 31.76 LBS/1000 GAL DIESEL (2) [RULE 2012, 2-5-2016; RULE 2012, 11-3-2023]; NOX: 45 PPMV DIESEL (5) [RULE 1135, 10-4-2024]; NOX: 45 PPMV DIESEL (4) [RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.008 LBS/MMBTU DIESEL (5) [RULE 1135, 10-4-2024]; PM: 0.022 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart IIII, 1-24-2023]; VOC: 0.14 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart IIII, 1-24-2023]; VOC: 30 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 30 PPMV DIESEL (5) [RULE 1135, 10-4-2024]	A63.3, A99.2, A195.11, A195.12, A195.13, B59.1, C1.5, D12.8, D12.9, D29.8, D29.9, D82.1, D323.2, E57.2, E193.4, E193.5, I297.2, K67.8

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
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Process 1: INTERNAL COMBUSTION					
DIESEL PARTICULATE FILTER, CUMMINS, WITH A DATA LOGGING AND ALARM SYSTEM GENERATOR, 1825 KW					
SELECTIVE CATALYTIC REDUCTION, BED 1, VANADIUM/TUNGSTEN, CUMMINS, MODEL CA452, WITH A 230 GALLON DIESEL EXHAUST FLUID TANK (SERVING BED 1 AND BED 2), 530 CU.FT.; WIDTH: 10 FT 5 IN; HEIGHT: 4 FT 2 IN; LENGTH: 15 FT 3 IN A/N: 634995 Permit to Construct Issued: 02/13/25	C99	D96		NH3: 10 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.14, D12.10, D12.11, D12.12, E193.6
SELECTIVE CATALYTIC REDUCTION, BED 2, VANADIUM/TUNGSTEN, CUMMINS, MODEL CA452, 530 CU.FT.; WIDTH: 10 FT 5 IN; HEIGHT: 4 FT 2 IN; LENGTH: 15 FT 3 IN A/N: 634995 Permit to Construct Issued: 02/13/25	C100	D96		NH3: 10 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.14, D12.10, D12.11, D12.12, E193.6
STACK, UNIT #2, DUAL EXHAUST DUCTING WITH 1 SCR BED IN EACH DUCT, SPLIT DUCTING COMBINED INTO ONE EXHAUST STACK, HEIGHT: 38 FT 6 IN; DIAMETER: 2 FT A/N: 628929 Permit to Construct Issued: 02/13/25	S101				

- * (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
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INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, UNIT NO. 3, DIESEL FUEL, CUMMINS, MODEL QSK60-G17, 16 CYLINDERS, 4 CYCLE, TURBOCHARGED, AFTERCOOLED, EXHAUST HEATER, 2655 BHP WITH A/N: 646016 Permit to Construct Issued: 02/13/25	D102	C105 C106	NOX: MAJOR SOURCE**	CO: 2.6 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; CO: 140 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 250 PPMV DIESEL (5) [RULE 1135, 10-4-2024]; NOX: 0.5 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; NOX: 31.76 LBS/1000 GAL DIESEL (2) [RULE 2012, 2-5-2016; RULE 2012, 11-3-2023]; NOX: 45 PPMV DIESEL (5) [RULE 1135, 10-4-2024]; NOX: 45 PPMV DIESEL (4) [RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.008 LBS/MMBTU DIESEL (5); PM: 0.022 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; VOC: 0.14 GRAM/BHP-HR DIESEL (8) [40CFR 60 Subpart III, 1-24-2023]; VOC: 30 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 30 PPMV DIESEL (5) [RULE 1135, 10-4-2024]	A63.3, A99.2, A195.11, A195.12, A195.13, B59.1, C1.5, D12.8, D12.9, D29.8, D29.9, D82.1, D323.2, E57.2, E193.4, E193.5, I297.3, K67.8

* (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.



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
DIESEL PARTICULATE FILTER, CUMMINS, WITH A DATA LOGGING AND ALARM SYSTEM GENERATOR, 1825 KW					
SELECTIVE CATALYTIC REDUCTION, BED 1, VANADIUM/TUNGSTEN, CUMMINS, MODEL CA452, WITH A 230 GALLON DIESEL EXHAUST FLUID TANK (SERVING BED 1 AND BED 2), 530 CU.FT.; WIDTH: 10 FT 5 IN; HEIGHT: 4 FT 2 IN; LENGTH: 15 FT 3 IN A/N: 646017 Permit to Construct Issued: 02/13/25	C105	D102		NH3: 10 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.14, D12.10, D12.11, D12.12, E193.6
SELECTIVE CATALYTIC REDUCTION, BED 2, VANADIUM/TUNGSTEN, CUMMINS, MODEL CA452, 530 CU.FT.; WIDTH: 10 FT 5 IN; HEIGHT: 4 FT 2 IN; LENGTH: 15 FT 3 IN A/N: 646017 Permit to Construct Issued: 02/13/25	C106	D102		NH3: 10 PPMV DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.14, D12.10, D12.11, D12.12, E193.6
STACK, UNIT #3, DUAL EXHAUST DUCTING WITH 1 SCR BED IN EACH DUCT, SPLIT DUCTING COMBINED INTO ONE EXHAUST STACK, HEIGHT: 38 FT 6 IN; DIAMETER: 2 FT A/N: 646017 Permit to Construct Issued: 02/13/25	S107				

- * (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
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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.



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: DEVICE ID INDEX

Device Index For Section H			
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FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

FACILITY CONDITIONS

F2.1 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
NOX	Less than 45 TONS IN ANY ONE YEAR

The limit shall become effective beginning January 1, 2027.

The facility-wide NOx emissions limit shall be reduced as follows:

Beginning January 1, 2028 - 30 Tons Per Year, Beginning January 1, 2030 - 13 Tons Per Year, Beginning January 1, 2035 - 6 Tons Per Year

The operator shall calculate the emissions as follows:

Using data from the CEMS for the diesel engines, including start up and shutdown emissions and any missing data substitutions.

Using a factor of 0.5 lbs/MW-hr for the existing microturbines

Using CEMS, or an emissions factor to be assigned by South Coast AQMD, for any new Near Zero Emissions units.

The deadline for meeting the 13 TPY and 6 TPY facility -wide NOx emissions limits is subject to the results of feasibility studies to be conducted by SCE by January 1, 2028., and January 1, 2033

[RULE 1135, 10-4-2024]



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 9-11-1998]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F14.2 The operator shall not purchase fuel oil containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 9-15-2000]

F67.1 The facility operator shall comply with all terms and conditions specified in the Settlement Agreement between SCE and SCAQMD dated March 2009 and Microturbine Site Agreement between SCE and SCAQMD dated November 2007, including the following:.



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

- a) Ensure that the battery or at least 50% of the operating capacity of the micro-turbines, or both be integrated with the generating system and in operable condition at all times, except during any necessary maintenance and repairs or during other unforeseen circumstances that would prevent such integration or operable condition
- b) Ensure that at least 635,000 kW of power is generated by the micro-turbines each calendar year, unless there are breakdowns or other intervening circumstances beyond the operator's control, and the operator promptly takes steps to repair the conditions causing the reduction in the amount of electricity that the micro-turbines are able to produce

[H&S 44300, 7-1-1988]

DEVICE CONDITIONS

A. Emission Limits

A63.1 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
ROG	Less than or equal to 11.2 LBS PER DAY
SOX	Less than or equal to 32.9 LBS PER DAY
PM10	Less than or equal to 44.4 LBS PER DAY
CO	Less than or equal to 206.1 LBS PER DAY

The limits for ROG, CO, and PM10 shall be verified using the latest source test results for each pollutant in lbs/hr multiplied by actual number of hours the unit has operated each day

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D42]



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

A63.2 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
PM	Less than or equal to 5.32 TONS IN ANY ONE YEAR

The limit shall be verified by using the results from the latest source test for PM emissions and either the total annual fuel use or the total annual hours of operation for the unit. The yearly emission limit shall be defined as a period of twelve (12) consecutive months determined on a rolling basis with a new 12 month period beginning on the first day of each calendar month

[RULE 1401, 3-7-2008]

[Devices subject to this condition : D42]

A63.3 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
CO	Less than 4397.04 LBS IN ANY CALENDAR MONTH
PM10	Less than 43.15 LBS IN ANY CALENDAR MONTH
VOC	Less than 535.68 LBS IN ANY CALENDAR MONTH
SOX	Less than 21.58 LBS IN ANY CALENDAR MONTH

The operator shall calculate the monthly emissions by using the monthly fuel use data and the following emissions factors: CO = 46.14 lbs/Mgal, PM10 = 0.453 lb/Mgal, VOC = 5.62 lb/Mgal, SOx = 0.226 lbs/Mgal

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 1313(g), 12-7-1995]

[Devices subject to this condition : D90, D96, D102]



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

- A99.1 The 51 PPM NOX emission limit(s) shall not apply during start up or shutdown periods. Each start up shall not exceed 60 minutes and each shutdown shall not exceed 15 minutes. There shall be no more than 720 start ups per year. NOx emissions for the 60 minutes which includes a start up shall not exceed 25 lbs.

[RULE 2005, 5-6-2005]

[Devices subject to this condition : D42]

- A99.2 The 31.76 lb/1000 gal NOX emission limit(s) shall only apply during the first year of operation prior to NOx CEMS certification for reporting NOx emissions.

[RULE 2012, 2-5-2016; RULE 2012, 11-3-2023]

[Devices subject to this condition : D90, D96, D102]

- A195.7 The 2.13 LBS/MW-HR NOX emission limit(s) is averaged over 1 year.

1. To demonstrate compliance with the Nox emission rate for Device D42, the facility permit holder shall comply with the following:.

(a) Determine the NOx emissions from the device pursuant to Rule 2012 including any required data substitution.

(b) For each quarter starting from the fourth quarter of compliance year 2001, report the quarterly NOx emissions and the energy produced in megawatts-hour for the quarter from this device. The report shall be filed along with the Quarterly Certificate of Emission Report (QCER) as required by Rule 2004.

2. The SCR control equipment shall be capable of achieving a NOx reduction of at least 70%.

[RULE 2004, 5-11-2001; RULE 2009.1, 5-11-2001]

[Devices subject to this condition : D42]



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

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

A195.9 The 51 PPM NOX emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry.



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The 51 PPM 60 minute average (One-Hour Block Average) NO_x emissions Limit is calculated by averaging four consecutive valid 15-minute averaging periods produced by the CEMS in a one-hour period at 15 percent O₂, dry. At least 1 minute of valid data is required for each 15-minute period.

An exemption from the 51 ppm One-Hour Block Average NO_x Limit shall apply no more than 5 times per calendar year, provided that a 40 ppm, at 15 percent O₂, dry, Three-Hour Block Average NO_x Limit is met.

The 40 ppm Three-Hour Block Average NO_x Limit is calculated by averaging 12 consecutive valid 15-minute averaging periods in a three-hour period that includes the one-hour period during which the 51 ppm One-Hour Block Average is exceeded. At least 1 minute of valid data is required for each 15-minute period. If the daily calibration check occurs during any of the twelve periods (periods 1-12), that period may be excluded and a 13th 15-minute period may be added (period 0 or 13).

All other valid 15 minute average periods included within the definitions of the One-Hour Block Average NO_x Limit and the Three-Hour Block Average NO_x Limit, including periods within those definitions with data substitution, shall be used to calculate the averages.

Notwithstanding the clock-hour requirements of Rule 2012, or the definition of One-Hour Block Average NO_x Limit in this condition, the NO_x emissions from the unit shall comply with BACT Limit for the 60 minute period beginning after the end of each start up, and for the 60 minute period beginning 15 minutes before the end of each shutdown. The average shall be based on four valid 15-minute periods, with at least 1 minute of valid data in each period.

The operator shall also show compliance with the BACT Limit for the overlapping clock-hour average in a start up or shutdown situation.

The operator shall keep minute data for at least 60 minutes after the end of a start up and at least 60 minutes prior to the start of a shutdown, and use the average of the data to show compliance with the 60-Minute BACT Limit averaged as defined above. Any data substitution during these 60 minute periods shall be used in the



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

calculation of the average.

[RULE 2005, 5-6-2005]

[Devices subject to this condition : D42]

A195.10 The 23 PPMV CO emission limit(s) is averaged over 1 hour at 15%O₂, dry.

This limit shall take effect no later than May 3, 2013..

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; 40CFR 63SubpartZZZZ, 3-9-2011]

[Devices subject to this condition : D42]

A195.11 The 45 PPMV NOX emission limit(s) is averaged over 3 hours rolling average at 15% O₂, dry.

The limit shall not apply during the engine commissioning, startup, or shutdown periods.

[RULE 1135, 7-19-1991; RULE 1135, 1-7-2022; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D90, D96, D102]

A195.12 The 140 PPMV CO emission limit(s) is averaged over 15 minutes at 15% O₂, dry.

The limit shall not apply during the engine commissioning, startup, or shutdown periods.

Prior to issuing the final Permit to Operate, South Coast AQMD may make a determination as to whether the CO BACT emission limit should be reduced. The determination shall be based on a

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



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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

[Devices subject to this condition : D90, D96, D102]

A195.13 The 30 PPMV VOC emission limit(s) is averaged over 15 minutes at 15% O₂, dry.

The limit shall not apply during the engine commissioning, startup, or shutdown periods.

[RULE 1135, 7-19-1991; RULE 1135, 1-7-2022; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D90, D96, D102]

A195.14 The 10.0 PPMV NH₃ emission limit(s) is averaged over 60 minutes at 15% O₂, dry basis..

The SCAQMD may require the installation of a CEMS designed to monitor ammonia concentration if the SCAQMD determines that a commercially available CEMS has been proven to be accurate and reliable and that an adequate Quality Assurance/Quality Control (QA/QC) protocol has been established. The SCAQMD or other agency must establish an SCAQMD approved QA/QC protocol prior to the ammonia CEMS becoming a requirement..

In the event that an approved ammonia CEMS is installed, the annual ammonia slip testing shall no longer be required..

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

[Devices subject to this condition : C93, C94, C99, C100, C105, C106]

B. Material/Fuel Type Limits

B59.1 The operator shall only use the following material(s) in this device :

diesel fuel meeting the requirements of Rule 431.2



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 1470, 10-1-2021; RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000; 40CFR 60 Subpart III, 1-24-2023]

[Devices subject to this condition : D90, D96, D102]

C. Throughput or Operating Parameter Limits

- C1.5 The operator shall limit the number of startups or shutdowns to no more than 360 in any one year.

Additionally, there shall be no more than 2 startups or shutdowns per day.

The startup period shall not exceed the lesser of: the time required to reach sufficient operating temperatures for proper operation of the control equipment, or 15 minutes from the time fuel is initially consumed by the engine.

The startup period shall not exceed four operating hours after an engine overhaul or major repair requiring removal of a cylinder head or for the installation or the replacement of catalytic emission control equipment.

Shutdowns shall not exceed 15 minutes..

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 429.2, 1-7-2022]

[Devices subject to this condition : D90, D96, D102]

D. Monitoring/Testing Requirements

- D12.8 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 1110.2, 11-3-2023; 40CFR 60 Subpart III, 1-24-2023]

[Devices subject to this condition : D90, D96, D102]



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

- D12.9 The operator shall install and maintain a(n) non-resettable totalizing fuel flow meter to accurately indicate the fuel usage of the engine.

[RULE 1313(g), 12-7-1995; RULE 2012, 2-5-2016; RULE 2012, 11-3-2023]

[Devices subject to this condition : D90, D96, D102]

- D12.10 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the hourly throughput of injected urea.

The operator shall install and maintain a device to continuously record the urea flow rate. Continuously record shall be defined as recording at least once every 15 minutes and shall be calculated based upon the average of the continuous monitoring for that hour. The flow meter shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The urea injection rate shall be maintained within 1.25 gph and 7.12 gph except during startups and shutdowns.

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

[Devices subject to this condition : C93, C94, C99, C100, C105, C106]

- D12.11 The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the exhaust at the inlet to the SCR reactor.

The temperature gauge shall continuously record the exhaust temperature. Continuous recording shall be defined as measuring at least once every 15 minutes and record the average of the continuous monitoring for that hour. The temperature gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The exhaust temperature shall be maintained between 500 degrees F and 900 degrees F, except during startup and shutdown periods.

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

[Devices subject to this condition : C93, C94, C99, C100, C105, C106]



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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

D12.12 The operator shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the SCR catalyst bed in inches of water column.

The pressure gauge shall continuously record the differential pressure. Continuous recording shall be defined as measuring at least once every 15 minutes and record the average of the continuous monitoring for that hour. The pressure gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The differential pressure shall not exceed 8 inches WC.

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

[Devices subject to this condition : C93, C94, C99, C100, C105, C106]

D29.2 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
NH3 emissions	District method 207.1	1 hour	Outlet of the SCR serving this equipment

The test shall be conducted at least quarterly during the first 12 months of operation of the SCR, and at least annually thereafter.

The test shall be conducted to determine the NH3 emissions at the outlet using the specified method measured over a 60 minute averaging time period. The NOx concentration , as determined by the CEMS, shall be simultaneously recorded during the ammonia slip test. If the CEMS is inoperable, a test shall be conducted to determine the NOx emissions using District method 100.1.

The test shall be conducted when the equipment is operating at 80 percent load or greater.

The test results shall be submitted to the SCAQMD within 45 days after the test date.



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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : D42]

D29.3 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
ROG emissions	Approved District method	1 hour	Outlet of the SCR serving this equipment
PM emissions	District method 5.2	1 hour	Outlet of the SCR serving this equipment
CO emissions	District method 100.1	1 hour	Outlet of the SCR serving this equipment



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

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

The test shall be conducted at least once every year for PM and ROG, and at least once every 2 years for CO, or in accordance with Rule 1110.2, whichever is more stringent

The test shall be conducted to determine compliance with the A63.1 limits. Test results in lbs/hr or lbs/1000 gallons shall be used in conjunction with either the hours of operation or the fuel use data to calculate the daily and annual emissions of these pollutants

The test shall be conducted to determine the oxygen levels in the exhaust. In addition, the tests shall measure the fuel flow rate (gph), the flue gas flow rate, and the engine generating output in MW. The test shall be conducted when the unit is operating at 80% of full load or greater (less than full load test results will be prorated to full load).

The NO_x concentration, as determined by the CEMS, shall be simultaneously recorded during the ROG and CO test. If the CEMS is inoperable, a test shall be conducted to determine the NO_x emissions using District Method 100.1 measured over a 60 minute averaging time period

The test shall be conducted in accordance with AQMD approved protocol. The protocol shall be submitted to the AQMD engineer no later than 45 days before the proposed test date and shall be approved by the AQMD before the test commences. The test protocol shall include the proposed operating conditions of the turbine during the tests, the identity of the testing lab, a statement from the lab certifying that it meets the criteria of R304, and a description of all sampling and analytical procedures

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

[Devices subject to this condition : D42]

D29.5 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
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FACILITY PERMIT TO OPERATE SO CAL EDISON CO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

CO emissions	EPA Test Method 10 or District Method 100.1	1 hour	Outlet of the SCR serving this equipment
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The test shall be conducted at least once every 3 years or 8,760 operating hours, whichever comes first

The initial test shall be performed no later than May 3, 2013.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; 40CFR 63SubpartZZZZ, 3-9-2011]

[Devices subject to this condition : D42]

D29.6 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
NOX emissions	District method 100.1	1 hour	Inlet of the SCR serving this equipment



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

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

The test shall be conducted to determine compliance with the applicable limits in 40 CFR 60 Subpart IIII, which are as follows:

17.0 g/kW-hr when maximum test speed is less than 130 rpm.

$45.0 \times N^{0.20}$ when maximum test speed is at least 130 but less than 2000 rpm, where N is the maximum test speed of the engine in revolutions per minute.. (NOTE: Round speed-dependent standards to the nearest 0.1 g/kW-hr.)

9.8 g/kW-hr when maximum test speed is 2000 rpm or more.

The test shall be conducted to determine the oxygen levels in the exhaust. In addition, the tests shall measure the fuel flow rate (gph), the flue gas flow rate, the engine generator output in kW, and the engine speed in rpm.

The test shall be conducted within 180 days after the work on the engine is completed and after confirmation that the unit was in fact reconstructed based on actual invoices.

The test results shall be submitted to the SCAQMD within 45 days after the test date.

Note: This test was conducted on July 13, 2018 and results submitted to AQMD. This condition will remain on the permit until a final Permit to Operate is evaluated and approved and the equipment is moved to Section D.

[40CFR 60 Subpart IIII, 7-7-2016]

[Devices subject to this condition : D42]

D29.8 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
CO emissions	District method 100.1	District-approved averaging time	Outlet of the SCR serving this equipment



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

VOC emissions	Approved District method	District-approved averaging time	Outlet of the SCR serving this equipment
NOx concentration	District method 100.1	District-approved averaging time	Outlet of the SCR serving this equipment
PM10 emissions	Approved District method	District-approved averaging time	Outlet of the SCR serving this equipment
NH3 emissions	District method 207.1	District-approved averaging time	Outlet of the SCR serving this equipment



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

This is the initial performance test.

Source testing shall be conducted within 180 days after engine installation, unless otherwise approved in writing by the Executive Officer.

The test shall be conducted to verify compliance with the applicable NO_x, CO, VOC, and PM₁₀ emissions limits of Rule 1135, Rule 1470, and BACT.

For CO and VOC testing: The test shall be conducted per Rule 1110.2 and shall include a test of at least 30 minutes duration at normal load, and tests of at least 15 minutes duration at minimum and peak loads. For all other pollutants: The test shall be conducted at a load of at least 90%.

For NH₃ testing: The NO_x concentration, as determined by the CEMS, shall be simultaneously recorded during the ammonia slip test. If the CEMS is inoperable, a test shall be conducted to determine the NO_x emissions using District Method 100.1 measured over a 60 minute averaging time period.

The source test protocol shall be submitted to the SCAQMD engineer no later than 60 days before the proposed test date and shall be approved by the SCAQMD before the test commences.

The South Coast AQMD shall be notified of the date and time of the test at least 30 days prior to the test. The test results shall be submitted to the South Coast AQMD within 60 days after the test date.

Emission data shall be expressed in terms of concentration (ppmv) corrected to 15 percent oxygen (dry basis), mass rate (lbs/hr), and lbs/MM Cubic Feet. All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and actual cubic feet per minute (ACFM). All moisture concentration shall be expressed in terms of percent.

Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (gph), the flue gas temperature, and engine load.



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

[RULE 1135, 10-4-2024; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)
-BACT, 12-6-2002]

[Devices subject to this condition : D90, D96, D102]

D29.9 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
CO emissions	District method 100.1	District-approved averaging time	Outlet of the SCR serving this equipment
VOC emissions	Approved District method	District-approved averaging time	Outlet of the SCR serving this equipment
PM emissions	Approved District method	District-approved averaging time	Outlet of the SCR serving this equipment
NH3 emissions	District method 207.1	1 hour	Outlet of the SCR serving this equipment



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

This is the periodic testing requirement.

For CO and VOC testing only: The test shall be conducted at least once every 2 years from the date of the previous source test (no later than the last day of the calendar month that the test is due) or 8760 operating hours, whichever occurs first.

The testing frequency may be reduced to once every 3 years if the engine has operated less than 2,000 hours since the last test. The test shall be conducted per Rule 1110.2 and shall include a test of at least 30 minutes duration at normal load, and tests of at least 15 minutes duration at minimum and peak loads.

The test shall be conducted to verify compliance with the applicable VOC emissions limit of Rule 1110.2. The test shall be conducted to verify compliance with the applicable CO BACT emissions limit.

For PM testing only: The test shall be conducted at least once every year from the date of the previous source test (no later than the last day of the calendar month that the test is due). The test shall be conducted at a load of at least 90%.

For NH₃ testing only: The test shall be conducted at least quarterly during the first twelve months after initial commissioning of the new engines. Testing may be conducted annually after 4 successful quarterly tests. If the results of any calendar year test show non-compliance with the limit, then quarterly tests must be conducted and at least 4 consecutive tests must show compliance with the limit before calendar year testing can resume.

The test shall be conducted at a load of at least 90%.

The NO_x concentration, as determined by the CEMS, shall be simultaneously recorded during the ammonia slip test. If the CEMS is inoperable, a test shall be conducted to determine the NO_x emissions using District Method 100.1 measured over a 60 minute averaging time period.

For all tests: The SCAQMD shall be notified of the date and time of the test at least 30 days prior to the test.



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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The test shall be conducted in accordance with an SCAQMD approved test protocol. The protocol shall be submitted to the SCAQMD engineer no later than 60 days before the proposed test date and shall be approved by the SCAQMD before the test commences unless otherwise authorized in writing by the Executive Officer.

Emission data shall be expressed in terms of concentration (ppmv) corrected to 15 percent oxygen (dry basis), mass rate (lbs/hr), and lbs/mmcf. All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute and dry actual cubic feet per minute. All moisture concentration shall be expressed in terms of percent. Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (CFH), the flue gas temperature, and engine load, under which the test was conducted.

The test results shall be submitted to the SCAQMD within 60 days after the test date.

In addition to the reference method tests, the operator shall also perform periodic CO emissions tests on the engine with a portable analyzer in accordance with the schedule and specifications outlined in Rule 1110.2. Test results shall be maintained on site for a minimum of 5 years and be made to SCAQMD personnel upon request.

[RULE 1110.2, 11-3-2023; RULE 1135, 10-4-2024; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D90, D96, D102]

D82.1 The operator shall install and maintain a CEMS to measure the following parameters:



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

NOX concentration in ppmv and O2 in percent

The CEMS shall measure the NOx concentration at least once per minute

Concentrations shall be corrected to 15 percent oxygen on a dry basis.

The CEMS shall convert the actual NOx concentrations to mass emission rates (lbs/hr) and record the hourly emissions on a continuous basis.

The CEMS shall be installed and operated, in accordance with an AQMD approved Rule 218, 218.1, 218.2, or 218.3 CEMS plan application, and/or an AQMD approved Rule 2012 CEMS plan application, whichever is applicable at the time of engine installation.

Installation shall be complete and CEMS operation shall commence within 180 days of initial approval of the CEMS plan application. Certification tests shall be completed within 90 days of installation and certification tests shall be submitted to the Executive Officer within 45 days after the tests are completed.

[**RULE 1135, 7-19-1991**; RULE 1135, 10-4-2024; RULE 2012, 11-3-2023; RULE 218.2, 9-2-2022; RULE 218.3, 9-2-2022]

[Devices subject to this condition : D90, D96, D102]



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

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]



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

[Devices subject to this condition : D42, D90, D96, D102]

E. Equipment Operation/Construction Requirements

E57.2 The operator shall vent this equipment to the SCR and diesel particulate filter whenever is in operation..

Urea injection shall commence when the exhaust temperature into the SCR catalyst reaches 550 degrees F.

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

[Devices subject to this condition : D90, D96, D102]

E73.1 Notwithstanding the requirements of Section E conditions, the operator may, at his discretion, choose not to use urea injection during start ups when the exhaust temperature at the inlet of the SCR reactor is less than 550 Deg F, not to exceed 1 hour:

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 402, 5-7-1976]

[Devices subject to this condition : D42]

E193.1 The operator shall construct, operate, and maintain this equipment according to the following specifications:

In accordance with all mitigation measures, as well as all design and operational representations, stipulated in the CEQA document that was prepared for this project by the South Coast AQMD (SCH No. 2003031050)

[CA PRC CEQA, 11-23-1970]

[Devices subject to this condition : D42]

E193.4 The operator shall operate and maintain this equipment as follows:



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

The operator shall operate and maintain the stationary engine and control device according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.

The engine shall not be operated without a diagnostic system including a Diesel Exhaust Fluid (DEF) level sensor and a critically low automatic shutoff. The operator shall maintain the DEF tank level and DEF quality in accordance with the manufacturer's recommendations.

After every 1000 hours of engine operation, the operator shall inspect the integrity of the diesel particulate filter and determine if the filter needs to be cleaned.

The operator shall not remove the diesel particulate filter's (DPF) filter media, except for cleaning, and only under the following circumstances: a) the internal combustion engine is not operated while the diesel particulate filter media is removed, and b) the diesel particulate filter's filter media is returned and reinstalled within 10 working days from the date of removal.

The owner or operator shall maintain records indicating the date(s) the diesel particulate filter's filter media was removed for cleaning and the date(s) the filter media was reinstalled. Records shall be retained for a minimum period of 60 months.

The DPF shall be installed with a backpressure monitor that notifies the operator when the high backpressure limit of the engine is approached. The owner or operator shall maintain records indicating the date(s) of any backpressure monitor alerts and the corrective actions taken. Records shall be retained for a minimum period of 60 months.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; 40CFR 60 Subpart III, 1-24-2023]



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

[Devices subject to this condition : D90, D96, D102]

E193.5 The operator shall locate and operate this equipment according to the following requirements:

The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless an extension has been granted in writing by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment.

Within 90 days from the first fire of each new engine D90, D96, and D102, the corresponding engine D2, D3, or D42 must be shutdown and removed from service.

[RULE 1313(d), 12-7-1995; RULE 205, 1-5-1990]

[Devices subject to this condition : D90, D96, D102]

E193.6 The operator shall install this equipment according to the following requirements:

The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless an extension has been granted in writing by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment.

[RULE 205, 1-5-1990]

[Devices subject to this condition : C93, C94, C99, C100, C105, C106]

E448.1 The operator shall comply with the following requirements:



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

SCE shall investigate the feasibility of installing an active DPF on Unit 15 by contacting at least one active DPF manufacturer no later than 1/4/2022. All correspondence with the DPF manufacturers shall be provided to the South Coast AQMD. By 1/18/22, SCE shall provide a report to South Coast AQMD detailing the findings, including all technical details, any supporting documentation, and any other information required by South Coast AQMD to evaluate the validity of the conclusions.

If either an active or a passive DPF is jointly determined by South Coast AQMD and SCE to be technically feasible for Unit 15, SCE shall submit required permit applications no later than 14 days after the feasibility determination is made. SCE shall pay for expedited processing of the permit application. SCE shall place a purchase order for the DPF within 7 days of receiving the South Coast AQMD permit.

SCE shall pay an expedited fee to the manufacturer if available. SCE shall commence installation of the DPF within 10 days of receipt of the DPF and shall achieve final compliance no later than 60 days after installation commenced.

Beginning 1/10/22, SCE shall assess the feasibility and the environmental, service, and operational impacts of increasing the use of the microturbines and shall report the results of the assessment to SC AQMD by 3/18/22. The assessment shall include a conclusion regarding whether at least 1,270,000 kWh of power can be generated by the microturbines each year until Unit 15 is brought into compliance, and if not, the maximum kWh/yr that can be reasonably and reliably achieved using the microturbines.

By 1/18/22, SCE shall begin investigating the feasibility of the following:

Using biodiesel or renewable diesel fuel for Unit 15 by contacting at least one biodiesel or renewable diesel supplier and provide South Coast AQMD with all correspondence for the supplier.

Installing DPFs on all other engines at Pebbly Beach by contacting at least one DPF manufacturer and provide South Coast AQMD with all correspondence for the DPF manufacturer.



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

Installing a 100kW-250kW fuel cell at Pebbly Beach.

Installing a 100kW-400kW PV solar system at the Pebbly Beach facility and provide South Coast AQMD with the preliminary results of that investigation.

SCE shall evaluate how the engines operate to reduce approximately 6 lbs of diesel PM-10 daily. SCE shall implement this procedure if it determined to be feasible.

By 4/1/22, SCE shall submit to South Coast AQMD a report and preliminary action plan describing the options determined to be infeasible and evaluating feasible options, and outlining the strategy selected from these options.

By 7/8/22, SCE shall submit to South Coast AQMD a final plan including detailed descriptions of the proposed solution and associated increments of progress and deadlines by which each of the stated milestones shall be met in the form of a Gantt Chart.

If the South Coast AQMD does not object to SCEs final selection by 8/5/22, SCE shall submit complete applications to South Coast AQMD no later than 8/19/22 for a Permit to Construct as necessary, for any new equipment needed to achieve the selection. SCE shall pay for expedited processing to South Coast AQMD and to any local, state, or federal agencies for necessary permits by 8/19/22.

SCE shall complete and issue all necessary purchase orders for any equipment necessary to achieve the strategy within 30 days of the issuance of the last of all required agency approvals, including the South Coast AQMD Permit to Construct. SCE shall install all necessary equipment and have the equipment fully operational within six months of either receiving a South Coast AQMD Permit to Construct and all necessary permits from other agencies, or receiving the required equipment, whichever comes later.

This permit condition is intended to be a summary of the detailed Findings and Decisions of the South Coast AQMD Hearing Board, Order for Abatement, Case No. 1262-115 dated January 4, 2022. Nothing in this condition shall override any



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

requirements of that decision or any modification thereof. This permit condition shall expire once SCE receives written confirmation from South Coast AQMD that the all requirements of the Order for Abatement have been met.

[RULE 802, 8-1-1975]

[Devices subject to this condition : D42]

H. Applicable Rules

H23.5 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
NOX	40CFR60, SUBPART	III

[40CFR 60 Subpart III, 7-7-2016]

[Devices subject to this condition : D42]

I. Administrative

I297.1 This equipment shall not be operated unless the facility holds 35640 pounds of NOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. RTCs held to satisfy this condition may be transferred only after one year from the initial start of operation. If the hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]

[Devices subject to this condition : D90]



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

- I297.2 This equipment shall not be operated unless the facility holds 35640 pounds of NO_x RTCs in its allocation account to offset the annual emissions increase for the first year of operation. RTCs held to satisfy this condition may be transferred only after one year from the initial start of operation. If the hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]

[Devices subject to this condition : D96]

- I297.3 This equipment shall not be operated unless the facility holds 35640 pounds of NO_x RTCs in its allocation account to offset the annual emissions increase for the first year of operation. RTCs held to satisfy this condition may be transferred only after one year from the initial start of operation. If the hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

[RULE 2005, 12-4-2015; RULE 2005, 11-5-2021]

[Devices subject to this condition : D102]

K. Record Keeping/Reporting

- K40.2 The operator shall provide to the District a source test report in accordance with the following specifications:



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

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 mass rate (lbs/hr). In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM).

All moisture concentration shall be expressed in terms of percent corrected to 15 percent oxygen.

Source test results shall also include engine fuel, exhaust gas rate, and engine and generator output under which the test was conducted.

In addition, NO_x emission data shall be expressed in terms of lbs/MW-hr

Emission data shall be expressed in terms of concentration (ppmv), corrected to 15 percent oxygen, dry basis.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 2005, 4-9-1999; RULE 2005, 4-20-2001]

[Devices subject to this condition : D42]

K67.8 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Time and duration of startups and shutdowns, and minute data (NO_x and O₂ concentration and fuel flow rate at a minimum) during each startup and shutdown

Total hours of operation, type of fuel, and fuel consumption, and cumulative hours of operation since the last source test. Total annual power output in MWh, gross and net.

[RULE 1135, 10-4-2024; RULE 429.2, 1-7-2022]



FACILITY PERMIT TO OPERATE SO CAL EDISON CO

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

[Devices subject to this condition : D90, D96, D102]

K171.1 The operator shall provide to the District the following items:

Final invoices for all work performed on Unit 15 as part of the zero time overhaul and replacement of the crankcase, including engine overhaul parts and labor, generator set refurbishment, factory testing, labor/per diem, removal and transportation, and new radiator costs. The information shall be provided within 60 days of completion of all work performed on Unit 15.

Note: This information was provided on April 11, 2018. This condition will remain on the permit until a final Permit to Operate is evaluated and approved and the equipment is moved to Section D.

[40CFR 60 Subpart A, 6-3-2016]

[Devices subject to this condition : D42]

Attachment B

Letter from Cummins to SCE (12/20/2024)



**Sales and
Service**

Tara Prabhu

Generation, Major Projects & Engineering. Project Management
1 Pebbly Beach Road, Avalon, Ca. 90704

12/20/2024

Tara,

This letter is in response to your request for proposal for a third DQKAM Tier 4 Certified Prime Power diesel generator.

We will not be able to provide a proposal for this third unit for Catalina Island as Cummins has discontinued production of our current Eco EPA Tier 4 Certified line of diesel generators. This decision went into effect in the third quarter of 2024 effectively making 2024 the last and final model year produced and sold. The next generation of Cummins EPA Tier 4 Certified products is currently in development, but specific timing is not yet available.

While we understand this temporary gap in our product offering may cause difficulties for certain customers and projects, we remain committed to supporting all our customers including Southern California Edison.

We apologize for the inconvenience this creates for the plans at your Pebbly Beach facility. But we do want to emphasize Cummins' continued commitment to our environment through the Destination Zero strategy, developing newer, cleaner, more efficient products, reducing greenhouse gasses and air quality impacts of its products.

Sincerely,

Paul van Niekerk
Cummins Sales and Service
Territory Manager – Power Generation
S.W. Los Angeles, Ca.

Cummins Inc.
1939 Deere Ave.
Irvine Ca. 92606
949- 253-6000
paul.vanniekerk@cummins.com