

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

SOUTH COAST AQMD
CLERK OF THE BOARD
2025 APR -2 AM 9:03

PETITIONER: Southern California Gas Company

CASE NO: 137-82

FACILITY ID: 8582

FACILITY ADDRESS: 8141 Gulana Avenue

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

City, State, Zip: Playa Del Rey, California 90293

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

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

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

Andrew Vogel, Esq.

Vincent Gonzales, Esq.

Senior Environmental Counsel

Senior Environmental Counsel

Southern California Gas Company

Southern California Gas Company

555 W. 5th St., Los Angeles, CA Zip 90013

555 W. 5th St., Los Angeles, CA Zip 90013

☎ (213) 244-2951 Ext.

☎ (213) 244-2948 Ext.

Fax (213) 629-9620

Fax (213) 629-9620

E-mail avogel@socalgas.com

E-mail vmgonzales@socalgas.com

3. RECLAIM Permit ☒ Yes ☐ No

Title V Permit ☒ Yes ☐ No

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]

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

The Good Cause finding is not required in this matter, because Petitioner is not seeking an emergency variance nor an interim variance.

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

Southern California Gas Company ("Petitioner") is a public utility engaged in the transmission, storage, and distribution of natural gas in the Southern California area. Petitioner owns and operates the Playa Del Rey Storage Facility (the "Facility") which is a natural gas storage field, storing natural gas in underground reservoirs during periods of low demand, and withdrawing the same natural gas during periods of high demand to support system reliability and respond to customer demand. The Facility plays a critical role in supporting the provision of natural gas supplies to meet the needs of persons and businesses in Southern California.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Internal Combustion Engine, non-emergency, two-stroke, lean burn, with insulated ducts and catalyst housing, natural gas. CB6, Cooper-Bessemer Model GMVH-10, 2000 hp	A/N# 629991	D14	
Internal Combustion Engine, non-emergency, two-stroke, lean burn, with insulated ducts and catalyst housing, natural gas. CB8, Cooper-Bessemer Model GMVH-10, 2000 hp	A/N# 629934	D16	
Internal Combustion Engine, non-emergency, two-stroke, lean burn, with insulated ducts and catalyst housing, natural gas. CB9, Cooper-Bessemer Model GMVH-10, 2000 hp	A/N# 629936	D17	

*Attach copy of denial letter

Attached hereto and incorporated herein as **EXHIBIT 1** is the Facility's Permit to Construct ("PTC") issued by the District on May 19, 2023, to allow Petitioner to modify the three internal combustion engines at the Facility, as further described below.

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The three (3) internal combustion engines ("ICEs" or the "Equipment") described above are essential for Facility operations, because they are used to compress natural gas for injection into the Facility's underground storage field. Without these ICEs, the Petitioner would not be able to operate the Facility as designed in order to provide natural gas services and delivery to the region.

Pursuant to the PTC, the Equipment are being modified and retrofitted with three (3) selective catalytic reduction units ("SCRs") which are air pollution control equipment designed to reduce NOx emissions from the ICEs. The SCRs are being installed to enable the ICEs to meet the 11 ppm NOx limit as required by the PTC as well as by District Rules 1100(d)(3) and 1110.2(e)(10).

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐
If yes, how often: Semi-Annually Date of last maintenance and/or inspection: October 24, 2024
Describe the maintenance and/or inspection that was performed.

The Equipment are regularly inspected and maintained in accordance with industry standards. Regular maintenance for the Equipment includes inspection of spark plugs and wires, oil, oil filters, and air filters. The engine control system also monitors operating parameters and triggers alarms if various operating parameters fall outside of normal range. For example, the system has alarms for exhaust gas temperature, lube oil cooling water, air manifold pressure, vibration, and related engine operating parameters.

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

Rule	Explanation
District Rule 1110.2(e)(10)	District Rule 1110.2(e)(10) requires the owner or operator "of a RECLAIM or former RECLAIM facility with any unit(s) subject to subdivision (d) shall meet the applicable NOx emission limit in Table II or III-B in accordance with the schedule specified in Rule 1100 – Implementation Schedule for NOx Facilities," which is 11 ppm 24 months after the PTC is issued. Petitioner will not be able to comply with the 11 ppm NOx limit by the May 18, 2025, deadline.
District Rule 1100(d)(3)	District Rule 1100(d)(3) requires the owner or operator of a RECLAIM or former RECLAIM facility subject to Rule 1110.2 with a compressor gas lean-burn engine that does not meet the 11 ppm NOx limit in Rule 1110.2(d)(1), apply for a permit to construct to meet the limit, and to meet that 11 ppm limit no later than 24 months after a permit to construct is issued. Petitioner will not be able to comply with the 11 ppm NOx limit by the May 18, 2025, deadline.
District Rules 203(b), 2004(f)(1) and 3002(c)(1) for PTC permit condition No. A195.5	These District Rules require the owner or operator of the Equipment to comply with all permit conditions in the PTC for the Equipment. PTC permit condition No. A195.5 requires the Equipment to meet the 11 ppm NOx no later than 24 months after the PTC was issued. Petitioner will not be able to comply with the 11 ppm NOx limit by the May 18, 2025, deadline.

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

Case No.	Date of Action	Final Compliance Date	Explanation

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

Case No.	Date of Action	Final Compliance Date	Explanation

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

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

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

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

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

The Facility is a RECLAIM facility and the RECLAIM program is sunseting. The Facility's three compressor gas lean-burn ICEs described above are currently being operated under RECLAIM, and they now must transition over to "command-and-control" and comply with the 11 ppm NOx limit in Rule 1110.2. Petitioner decided to retrofit the ICEs with SCRs, pursuant to Rule 1100(d)(3).

- First problem: The existing ICE configuration involving the use of the existing turbochargers was found to be inadequate.

On June 23, 2021, Petitioner filed an application at the District for a permit to construct to retrofit the ICEs and install SCRs. Working with Cooper-Bessemer, the compressor's original equipment manufacturer ("OEM"), to engineer the retrofit of the ICEs, Petitioner and the OEM originally planned to use the existing ICE configuration, including the use of the existing turbochargers with a modification to the impeller only to augment air flow. They viewed this approach as the most efficient way to meet the emissions limits without having to design and order new equipment.

What is a turbocharger? A turbocharger is a mechanism used to compress air into the combustion chamber of an ICE, allowing for more fuel to be mixed and ignited, resulting in increased power output. A turbocharger compresses air by using exhaust gas from the ICE to spin a turbine. What is an impeller? An impeller is a driven rotor used to increase the pressure and flow of a fluid where the flow creates suction in a pump or compressor.

Petitioner and the OEM started by working on one ICE first. While engineering the ICE's retrofit, Petitioner and the OEM encountered unexpected performance issues with the ICE's existing turbocharger after having modified the first ICE's impeller. Because a turbocharger's level of compressibility is directly linked to the ICE's exhaust flow, there was no way for the turbocharger to maximize power output without having to maximize exhaust flow, which itself is dependent on power output.

After operation of the first modified turbocharger yielded unexpectedly low air flow results, in February 2022, Petitioner and the OEM determined that the existing turbocharger design was just not capable of delivering the performance level necessary to meet the stricter emission limits. They then began searching for and evaluating other turbocharger designs that would meet performance specifications, but after several months, they were unsuccessful.

In November 2022, the OEM and Petitioner concluded that due to a calculation error made by the OEM, no existing turbocharger design can meet the performance specifications given the current Equipment configuration. Consequently, the OEM and Petitioner began reevaluating other options and configurations that would meet emissions requirements.

- Second problem: Engineering for and selecting the superchargers took longer than expected.

In February 2023, Petitioner and the OEM decided that the turbochargers in each of the ICEs needed to be replaced with superchargers.

What is a supercharger? A supercharger is a mechanism like a turbocharger that compresses air into an ICE's combustion chamber to maximize power output. It differs from a turbocharger in that a supercharger is powered independently from the engine (in this case by an electric motor). It does not rely on engine exhaust flow and can be sized appropriately to overcome obstacles such as flow restrictions from using lots of piping or multiple catalysts, among other things.

On May 19, 2023, SCAQMD issued the PTC (EXHIBIT A), with an expiration date 12 months later, on May 18, 2024. At the time of the PTC's issuance, Petitioner and the OEM were still conducting the engineering work and searching for superchargers to replace the turbochargers. Consequently, the PTC lists the turbochargers instead of the superchargers.

After completing the engineering work and evaluating various options, in December 2023, Petitioner placed an order through the OEM for three superchargers for the three ICEs.

- Third problem: Replacing the turbochargers with superchargers triggered the need for additional electrical power and a larger building.

Attached hereto and incorporated herein as **EXHIBIT 2** is a Google Earth satellite view of the Facility with its property borders delineated. The Facility consists of two sections. The southern portion of the Facility is the "Upper Facility," which is physically located at higher elevation on the top of the bluff. Several structures such as an office building and the compressor building can be seen, in addition to parking spaces. The northern portion is the "Lower Facility", which is at lower elevation below the bluff and where smaller structures such as aboveground storage tanks can be seen. A private access road runs West-East between the two sections. The Upper Facility is where the SCRs and the Equipment with superchargers will be located.

When Petitioner and the OEM were engineering the replacement of the turbochargers with superchargers, it became clear that the superchargers will need additional power beyond what the Upper Facility can currently provide. The need to provide additional power for the superchargers in the Upper Facility gave rise to a separate and additional engineering project to design and install a 5kV power feeder connecting the Lower Facility, where the necessary power is available, and the Upper Facility to meet the increased power demands of the superchargers.

In January 2024, Petitioner placed an order for 5kV electrical equipment, including switchgear, a transformer, and variable frequency drives (VFDs). These electrical upgrades are designed to distribute the power from the new 5kV power feeder to the superchargers and other auxiliary equipment in the Upper Facility.

Because the PTC was about to expire on May 18, 2024, on April 25, 2024, SoCalGas requested that the District extend the expiration date of its PTC for an additional 12 months. Petitioner also updated the District on the problems it was having with the turbochargers, and that it would be replacing them with electrically

driven superchargers instead. On May 14, 2024, the District approved the PTC extension request, setting the new PTC expiration date to May 18, 2025.

The last major equipment orders for the project include a 480V power distribution center (ordered June 2024) and fin fan coolers (ordered September 2024).

In the meantime, the existing compressor building with the ICEs needed to be significantly expanded to accommodate the SCRs, the refurbished Equipment, as well as the additional electrical equipment needed by the superchargers. Construction work to modify the existing compressor building began in the second quarter of 2024 and is anticipated to continue through the first quarter of 2025.

To summarize, when Petitioner filed its PTC application in June 2021, it did not foresee the delays caused by (1) the turbochargers' inability to meet the emission limit, (2) the search for suitable superchargers, and (3) the need for increased electrical power and a larger compressor building. The cumulative effect of these three contingencies, therefore, is the certainty that on May 18, 2025 – 24 months after the PTC was issued on May 19, 2023 – the Equipment will be unable to meet the 11 ppm NOx limit requirement set forth in Rule 1110.2(e)(10) and in PTC condition A195.5.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

Petitioner first became aware that it would not be able to comply with the rules and permit condition cited above, in October of 2024.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

As soon as Petitioner became aware, in October 2024, that it would not be able to complete construction and meet the Rule 1110.2 NOx limits by May 18, 2025, it raised the issue with its legal department. Petitioner had earlier taken steps to expedite the delivery and installation of the various pieces of equipment, but despite these attempts, it could not see a way to achieve compliance by May 18, 2025.

In November 2024, concerned about its imminent violation of District Rules 1100 and 1110.2, and PTC condition A195.5, Petitioner contacted the District to request a meeting to discuss these issues.

On December 5, 2024, Petitioner met in person with members of the District's engineering staff to discuss the PTC challenges Petitioner was having: the turbocharger issues, switching to superchargers, and the additional electrical and construction work triggered by replacing the turbochargers with superchargers. This meant that Petitioner would be unable to complete construction and meet the 11 ppm NOx limit by the May 18, 2025, deadline.

During this December 5 meeting, Petitioner discussed the compliance plan that Petitioner planned to submit pursuant to Rule 1100(d)(5), should the SCRs not be fully installed and operational by the May 18, 2025, deadline. This Rule 1100 compliance plan is a path set forth in District Rule 1100(d)(5) for obtaining a time extension of the 24-month deadline to comply with the 11 ppm NOx limit. Subsection 1100(d)(5)(A) states that the owner or operator of a RECLAIM facility with a compressor lean-burn ICE can request an extension of up to 24 months of the deadline to meet the Rule 1110.2 emissions limits if it applies for a compliance plan no later than 22 months after the PTC was issued.

On January 16, 2025, after having conferred with District management, District staff emailed Petitioner, informing Petitioner that after discussing this request internally at length, they could confirm that the Rule 1100 compliance plan is an option for Petitioner.

Petitioner submitted the Rule 1100 compliance plan ("Compliance Plan") on March 14, 2025 – 22 months after the PTC was issued. District staff indicated, however, that since this is the first Rule 1100 compliance plan they have been asked to review, it may take them three months to review the document. This would mean that Petitioner may not know till June 18, 2025, whether its Rule 1100 compliance plan is approved or rejected by the District – which is a month past its May 18, 2025, 11 ppm NOX limit compliance deadline.

Petitioner, therefore, is seeking variance relief from the 11 ppm NOx requirement, because it will not complete construction in time to meet its May 18, 2025, deadline, and because the District may not approve its Rule 1100 compliance plan by May 18, 2025.

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: Economic losses to Petitioner are estimated in excess of \$25,000 per day

Number of employees laid off (if any): None anticipated.

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

If the variance was not granted in this matter, Petitioner would be subject to fines and penalties in excess of \$25,000 a day due to noncompliance with the applicable District rules and permit condition.

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

No. Curtailing or terminating operations at the Facility will not remove the need to comply with the 11 ppm NOx limit by the May 18, 2025, deadline, as set forth in the PTC and in Rules 1100(d)(3) and 1110.2(e)(10). A variance from the 11 ppm NOx limit is, therefore, required.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
NOx	54.48	0.00	54.48

* Column A minus Column B = Column C

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

Excess Opacity: _____ 0%

20. Show calculations used to estimate quantities in No. 19 or explain why there will be no excess emissions.

The Equipment – units D14, D16 and D17 – are currently subject to RECLAIM and their NOx emissions are estimated and reported based on the maximum allowable 225 ppm NOx concentration limit set forth in Rule 2012 and in its RECLAIM permit.

Using equation 17 in Rule 2012, Appendix A, Chapter 3, Petitioner calculated an emission factor of 884.92 lbs/MMSCF based on the 225 ppm limit, and 43.26 lbs/MMSCF based on the 11 ppm limit.

Petitioner will assume that the overall weather as it relates to natural gas demand during the variance period in 2025 will be similar to 2024.

Therefore, applying those factors to the Facility's 2024 RECLAIM emissions report for the Equipment:

	225 ppm NOx Limit	11 ppm NOx Limit	Excess Emissions (difference)
D14	6,493.61	317.45	6,176.16
D16	8,414.24	411.36	8,002.88
D17	6,056.64	296.09	5,760.55
Total	20,964.49	1,024.90	19,939.59

Dividing 19,939.59 total pounds by 366 days (2024 was a leap year), we arrive at 54.48 pounds per day during the variance period.

The estimated excess emissions per day is a very conservative estimate, because it assumes that each of the Equipment is emitting at the maximum allowable rate of 225 ppm. The actual excess emissions are more likely to be lower. Indeed, on March 10, 2025, unit D16 was source tested, and its NOx concentration rate was preliminarily measured at 124.76 ppm. Units D14 and D17 will be tested shortly.

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.

The Facility does not have other sources of NOx emissions that it can either operate less or not operate at all, to mitigate the excess NOx emissions generated during the variance period. Nonetheless, Petitioner intends to work as expeditiously as possible to complete the retrofit of the Equipment with SCRs so that the Equipment can operate in compliance with the 11 ppm NOx limit as soon as practicable.

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.**

Petitioner will quantify emissions during the variance period the same way it quantifies and records emissions for purposes of complying with RECLAIM. It will record fuel meter readings of each ICE at the end of each calendar month and each monthly fuel reading will be used to calculate total NOx emissions from the ICE for

that given month. Petitioner will then make these monthly RECLAIM emissions reports available to the District for purposes of this variance.

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.

Petitioner intends to achieve compliance with above rules and permit condition, primarily by completing the retrofit of each of its Equipment with SCRs as soon as practicable according to the following schedule:

- Unit D14
 - October 6, 2025: Remove unit from service
 - November 6, 2025: Finish construction
 - December 2, 2025: Finish commissioning
 - January 23, 2026: Finish RATA and compliance testing
- Unit D16:
 - September 8, 2025: Remove unit from service
 - October 8, 2025: Finish construction
 - October 30, 2025: Finish commissioning
 - January 16, 2026: Finish RATA and compliance testing
- Unit D17:
 - June 2, 2025: Remove unit from service
 - September 7, 2025: Finish construction
 - October 6, 2025: Finish commissioning
 - January 9, 2026: Finish RATA and compliance testing

Note that RATA and compliance testing may be moved to an earlier date depending on construction progress and the ability to bring individual units online sooner. In other words, Petitioner may decide to test a unit soon after it finishes commissioning, rather than wait until all units have been commissioned and are operating.

Concurrently, Petitioner is also planning to achieve compliance via the Rule 1100 compliance plan it submitted to the District on March 14, 2025, which would give Petitioner additional time to complete construction and meet the 11 ppm NOx limit, pursuant to Rule 1100(d)(5),

24. State the date you are requesting the variance to begin: May 19, 2025; and the date by which you expect to achieve final compliance: May 18, 2026.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Shannon Lee

Ext. 2153

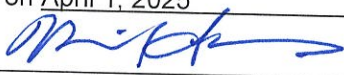
Osiris Torres _____ Ext. 2415
Li Chen _____ Ext. 2426
Christian Aviles _____ Ext. 3147

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

Name _____ Company _____ Title _____

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

Executed on April 1, 2025, at Los Angeles, California


Signature _____ Print Name Vincent Gonzales

Title: Senior Environmental Counsel

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

Declaration Re Reduced Fee Eligibility

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

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

2. The petitioner is
a) ☐ a business that meets the following definition of Small Business as set forth in District Rule 102:
SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:
(a) the number of employees is 10 or less; **AND**
(b) the total gross annual receipts are \$500,000 or less **or**
(iii) the facility is a not-for-profit training center.

-OR-

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

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

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

Executed on _____, at _____, California

Signature _____ Print Name _____

Title _____



South Coast Air Quality Management District

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

May 19, 2023

Karin Fickerson
Air Quality Programs Manager
Southern California Gas Co./Playa del Rey Storage Facility
8141 Gulana Ave.
Playa del Rey, CA 90293

Subject: Southern California Gas Co./Playa del Rey Storage Facility (Facility ID 8582)
Title V De Minimis Significant Permit Revision

Dear Ms. Fickerson:

Please find enclosed the revised Title V permit revision for equipment located at 8141 Gulana Ave., Playa del Rey, CA 90293. The enclosed permit incorporates the approval of the de minimis significant permit revision requested in Application No. 629940 to add three Selective Catalyst Reduction systems to three existing internal combustion engines. The permit revision is included in Section H of the RECLAIM/Title V permit. The Title V de minimis significant permit revision was submitted to USEPA on March 14, 2023. The USEPA has 45 days from receipt of the proposed permit and all necessary documentation to object in writing to issuance of the proposed permit. The South Coast Air Quality Management District (South Coast AQMD) did not receive any comments from USEPA.

Section H of this revised permit reflects the approval of the following:

Equipment	Application No.	Device ID	Permit Type
Internal Combustion Engines	629934, 36, 91	D16, 17, 14	Permit to Construct
Selective Catalytic Reduction Systems	629937, 38, 39	C132, 133, 134	Permit to Construct

Please review the attached section carefully. Insert the enclosed section into your RECLAIM/Title V Facility Permit and discard the earlier versions. If you determine there are administrative errors or if you have questions concerning your RECLAIM/Title V permit, please contact Mr. Christian Aviles at (909) 396-3147 or caviles@aqmd.gov within 30 days of 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:CA
Enclosure: Section H of Facility Permit
Cc: USEPA Region IX
Application Folder A/N-629940



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

Title Page	
Facility ID:	008582
Revision #:	54
Date:	May 19, 2023

FACILITY PERMIT TO OPERATE

**SO CAL GAS CO/PLAYA DEL REY STORAGE FAC
8141 GULANA AVE
PLAYA DEL REY, CA 90293**

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 Nastri
Executive Officer

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



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	29	10/14/2022
E	Administrative Conditions	15	08/15/2017
F	RECLAIM Monitoring and Source Testing Requirements	13	08/15/2017
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H	Permit To Construct and Temporary Permit to Operate	21	05/19/2023
I	Compliance Plans & Schedules	12	03/10/2021
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B	Rule Emission Limits	7	08/15/2017



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING, CB6, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, WITH STAGED COMBUSTION, AFTERCOOLER, TURBOCHARGER, 2000 HP WITH A/N: 629991 Permit to Construct Issued: 05/18/23	D14	C132	NOX: LARGE SOURCE**	CO: 89 PPMV (4) [RULE 1303(a)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]; NOX: 11 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012, 2-5-2016]; PM: (9) [RULE 404, 2-7-1986]; VOC: 56 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]	A195.1, A195.4, A195.5, C1.1, C1.8, D29.5, D29.7, D82.1, E448.1, H23.8, H23.10, H23.16, I331.1, K67.4
CO OXIDATION CATALYST, BASF CAMEL, 24" X 24" X 3 11/16", WITH AN AIR TO FUEL RATIO CONTROLLER,, (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM. COMPRESSOR	C132	D14 C159			
SELECTIVE CATALYTIC REDUCTION, NO. 1, WITH TWO MODULES, CORMETECH, MODEL CM27, OR EQUIVALENT, 42 CU.FT.; WIDTH: 4 FT ; HEIGHT: 2 FT ; LENGTH: 4 FT WITH A/N: 629937 Permit to Construct Issued: 05/18/23 UREA INJECTION SYSTEM	C159	C132		NH3: 20 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.6, D12.5, D12.6, D29.8, E179.1, E193.3

- * (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 SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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					
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING, CB8, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, WITH STAGED COMBUSTION, AFTERCOOLER, TURBOCHARGER, 2000 HP WITH A/N: 629934 Permit to Construct Issued: 05/18/23	D16	C133	NOX: LARGE SOURCE**	CO: 89 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 250 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]; NOX: 11 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012, 2-5-2016]; PM: (9) [RULE 404, 2-7-1986]; VOC: 56 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]	A195.1, A195.4, A195.5, C1.1, C1.8, D29.5, D29.7, D82.1, E448.1, H23.8, H23.10, H23.16, I331.1, K67.4
CO OXIDATION CATALYST, BASF CAMET, 24" X 24" X 3 11/16", WITH AN AIR TO FUEL RATIO CONTROLLER, (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM. COMPRESSOR	C133	D16 C160			

- * (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 GAS CO/PLAYA DEL REY STORAGE FAC

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					
SELECTIVE CATALYTIC REDUCTION, NO. 2, WITH TWO MODULES, CORMETECH, MODEL CM27, OR EQUIVALENT, 42 CU.FT.; WIDTH: 4 FT ; HEIGHT: 2 FT ; LENGTH: 4 FT WITH A/N: 629938 Permit to Construct Issued: 05/18/23 UREA INJECTION SYSTEM	C160	C133		NH3: 20 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.6, D12.5, D12.6, D29.8, E179.1, E193.3
INTERNAL COMBUSTION ENGINE, NON-EMERGENCY, TWO STROKE LEAN, LEAN BURN, WITH INSULATED DUCTS AND CATALYST HOUSING, CB9, NATURAL GAS, COOPER-BESSEMER, MODEL GMVH-10, WITH STAGED COMBUSTION, AFTERCOOLER, TURBOCHARGER, 2000 HP WITH A/N: 629936 Permit to Construct Issued: 05/18/23 CO OXIDATION CATALYST, BASF CAMEL, 24" X 24" X 3 11/16", WITH AN AIR TO FUEL RATIO CONTROLLER, (WASTE GATE VALVE), EMBEDDED IN THE ENGINE CONTROL SYSTEM. COMPRESSOR	D17 C134	C134 D17 C161	NOX: LARGE SOURCE**	CO: 89 PPMV (4) [RULE 1303(a)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]; NOX: 11 PPMV NATURAL GAS (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]; NOX: 225 PPMV NATURAL GAS (3) [RULE 2012, 2-5-2016]; PM: (9) [RULE 404, 2-7-1986]; VOC: 56 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]	A195.1, A195.4, A195.5, C1.1, C1.8, D29.5, D29.7, D82.1, E448.1, H23.8, H23.10, H23.16, I331.1, K67.4

- * (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 GAS CO/PLAYA DEL REY STORAGE FAC

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					
SELECTIVE CATALYTIC REDUCTION, NO. 3, WITH TWO MODULES, CORMETECH, MODEL CM27, OR EQUIVALENT. 42 CU.FT.; WIDTH: 4 FT ; HEIGHT: 2 FT ; LENGTH: 4 FT WITH A/N: 629939 Permit to Construct Issued: 05/18/23 UREA INJECTION SYSTEM	C161	C134		NH3: 20 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.6, D12.5, D12.6, D29.8, E179.1, E193.3
Process 10: R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE SPECIFIC RULES					
STORAGE TANK, AQUEOUS UREA, 6000 GALS; DIAMETER: 9 FT ; HEIGHT: 13 FT	E162				
STORAGE TANK, AQUEOUS UREA, 6000 GALS; DIAMETER: 9 FT ; HEIGHT: 13 FT	E163				

- * (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.



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

Section H	Page: 5
Facility ID:	008582
Revision #:	21
Date:	May 19, 2023

FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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 GAS CO/PLAYA DEL REY STORAGE FAC**

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D14	1	1	0
D16	2	1	0
D17	3	1	0
C132	1	1	0
C133	2	1	0
C134	3	1	0
C159	1	1	0
C160	3	1	0
C161	4	1	0
E162	4	10	0
E163	4	10	0



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

FACILITY CONDITIONS

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, 11-9-2001]

F14.1 The operator shall not use diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

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

PROCESS CONDITIONS

P13.1 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1149

[RULE 1149, 5-2-2008]

[Processes subject to this condition : 3]

SYSTEM CONDITIONS



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

- S4.1 The following condition(s) shall apply to all affected devices listed under Section H of this system for fugitive emissions of volatile organic compounds (VOC):

All valves, fittings, and flanges associated with the still column (V-641), glycol reboiler (V-642), glycol flash tank (V-643) and still overhead condenser (V664) shall be identified, tagged and inspected quarterly using EPA Method 21.

Any leak greater than 500 ppm shall be repaired within 14 days of detection.

The operator shall keep records of the quarterly inspection, subsequent repair, and re-inspection, in a manner approved by the District.

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

[Systems subject to this condition : Process 2, System 2]

DEVICE CONDITIONS

A. Emission Limits

- A195.1 The 56 PPMV VOC emission limit(s) is averaged over the sampling time required by the test method and corrected at 15 percent O₂ on a dry basis..

The VOC concentration limit shall not apply during the engine start-up period or shutdown period..

[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]

[Devices subject to this condition : D14, D16, D17]

- A195.4 The 89 PPMV CO emission limit(s) is averaged over the sampling time required by the test method and corrected at 15 percent O₂ on a dry basis..

The CO concentration limit shall not apply during the engine start-up period or shutdown period..

[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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 : D14, D16, D17]

A195.5 The 11 PPMV NOX emission limit(s) is averaged over 3 hours at 15 percent O₂, dry.

The NO_x concentration limit shall not apply during the engine start-up period or shutdown period..

The NO_x emissions limit shall apply no later than 24 months after the Permit to Construct is issued (Revision 21), unless an extension is approved in writing by the Executive Officer.

Until the emission limit is achieved, the operator shall provide applicable quarterly reports as specified in Rule 1100 including but not limited to:

1. CEMS minute data
2. Source test data
3. Applicable engine and control equipment parameters affecting emissions
4. Increments of progress measures that have been taken to meet the limit
5. Reasons the limit cannot be met
6. Number of occurrences that the limit was exceeded, the duration, and the recorded or tested concentration
7. Other applicable parameters, as well as corrective actions, shall include, but are not limited to, those specified in Attachment 1 of Rule 1110.2

[RULE 1100, 1-10-2020; **RULE 1110.2, 2-1-2008**; RULE 1110.2, 11-1-2019]

[Devices subject to this condition : D14, D16, D17]

A195.6 The 20 PPMV NH₃ emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry.

The NH₃ concentraion shall be measured at the outlet of the SCR.

The NH₃ concentration limit shall not apply during the engine start-up period.



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1401, 9-1-2017]

[Devices subject to this condition : C159, C160, C161]

C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the operating time to no more than 2190 hours in any one year.

To comply with this condition, the operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

The purpose(s) of this condition is to ensure that this equipment qualifies as a large source.

[RULE 2012, 12-5-2003; RULE 2012, 1-7-2005]

[Devices subject to this condition : D14, D16, D17]

C1.8 The operator shall limit the duration of startup to no more than 60 minute(s).

A start-up, as described above, shall be defined as the time from initial fuel introduction to the engine for combustion until sufficient operating temperatures are reached for proper operation of the emission control equipment or for tuning of the engine and/or emission control equipment.

A start-up, after an engine overhaul or major repair requiring removal of a cylinder head or for the installation or replacement of catalytic emission control equipment, shall limit the duration to no more than four operating hours.

The operator shall limit the duration of shutdown to no more than 30 minute(s).

[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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 : D14, D16, D17]

D. Monitoring/Testing Requirements

- D12.5 The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the exhaust at the inlet of the SCR reactor.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The catalyst temperature range shall remain between 475 degrees F and 700 degrees F.

The temperature range requirement of this condition does not apply during start-up operations of the engine not to exceed 60 minutes per start-up.

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

[Devices subject to this condition : C159, C160, C161]

- D12.6 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the the total hour throughput of injected aqueous urea.



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The records shall be kept on site and made available to the South Coast AQMD personnel upon request.

The urea injection system shall be placed in full operation as soon as the minimum operating temperature is reached. The minimum temperature is listed as 475 degrees F at the inlet to the SCR reactor.

The maximum aqueous urea injection rate shall not exceed 20 pound/hr.

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

[Devices subject to this condition : C159, C160, C161]

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
CO emissions	District method 100.1	District-approved averaging time	Outlet
VOC emissions	District Method 25.3	District-approved averaging time	Outlet



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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 once every two years or 8760 operating hours, whichever comes first. If the engine operates less than 2000 hours since the previous test, then testing may be reduced to once every 3 years.

If the engine has not been operated within 3 months of the test date, follow the testing schedule per Rule 1110.2.

The source test results shall be submitted to the District no later than 60 days after the source test was conducted.

The operator of the engine shall keep sufficient operating records to demonstrate that it meets the requirements of extension of the source testing deadlines.

Emissions 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. 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).

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.

[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]

[Devices subject to this condition : D14, D16, D17]

D29.7 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



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

VOC emissions	District Method 25.3	District-approved averaging time	Outlet
NOX emissions	District method 100.1	District-approved averaging time	Outlet
NH3 emissions	District method 207.1	District-approved averaging time	Outlet



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

- A. Source testing shall be conducted within 180 days after the SCR and oxidation catalyst has been installed and operational, unless otherwise approved in writing by the Executive Officer.
- B. The source test shall be conducted only after a source test protocol has been submitted and approved by the South Coast AQMD.
- C. Source test protocol(s) shall be submitted to the South Coast AQMD, Attention: Christian Aviles, 21865 Copley Drive, Diamond Bar, CA 91765 or submit the protocol electronically to caviles@aqmd.gov at least 60 days prior to commencement of the source test, unless otherwise approved in writing by the Executive Officer.
- D. Notice of the source test(s) shall be submitted to the South Coast AQMD, Attention: Christian Aviles, caviles@aqmd.gov, 909-396-3147 at least 14 (fourteen) days prior to commencement of testing so that a South Coast AQMD observer may be present.
- E. The source test shall be done to verify compliance with the applicable NOx, CO and VOC emissions limits of Rule 1110.2.
- F. The source test shall be done to verify compliance with the ammonia emissions limits of 20 ppmv corrected to 15 percent oxygen on a dry basis.
- G. The NOx, CO and VOC source tests shall be conducted in accordance with the required South Coast AQMD Test Method.
- H. The test shall be conducted per Rule 1110.2. The operator shall identify in the source test protocol what loads this equipment operates and test accordingly.
- I. Source test reports (include the application number and a copy of the permit in the report) shall be submitted to the South Coast AQMD (addressed to South Coast Air Quality Management District, Attention Christian Aviles, P.O. Box 4941, Diamond Bar, CA 91765, or submitted electronically to caviles@aqmd.gov 60 days after the source test is completed, unless otherwise approved in writing by the Executive Officer.



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

It shall include, but not limited to, emission rate in pounds per hour and concentration in ppmv at the outlet of the air pollution control system.

The following operating data shall also be included for each firing rate.

- i. The exhaust flow rates, in actual cubic feet per minute (ACFM);
- ii. The engine loads
- iii. The exhaust temperature, in degrees F;
- iv. The oxygen content of the exhaust gases in percent;
- v. The fuel flow rate

J. A testing laboratory certified by the South Coast AQMD Laboratory Approval Program (LAP) in the required test methods for criteria pollutant to be measured, and in compliance with South Coast AQMD Rule 304 (no conflict of interest) shall conduct the test.

K. Sampling facilities shall comply with the South Coast AQMD "Guidelines for Construction of Sampling and Testing Facilities", pursuant to Rule 217.

[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]

[Devices subject to this condition : D14, D16, D17]

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
NH3 emissions	District method 207.1	1 hour	Outlet



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The South Coast AQMD shall be notified of the date and time of the test at least 7 days prior to the test. The operator shall use the source test protocol identified in condition D29.7.

The test shall be conducted at least quarterly during the first twelve months of operation (this includes the first compliance test for NO_x, CO and VOC). After four consecutive quarterly source tests demonstrate compliance, the source tests shall be conducted annually thereafter. If a source test is failed, four consecutive quarterly source tests shall demonstrate compliance with the ammonia emissions limits prior to resuming source tests annually.

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 District approved averaging time period.

The test shall be conducted to demonstrate compliance with the Rule 1303 BACT concentration limit of 20 ppmv corrected to 15 percent oxygen on a dry basis.

[RULE 1100, 1-10-2020; **RULE 1110.2, 2-1-2008**; RULE 1110.2, 11-1-2019; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C159, C160, C161]

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



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

NOX concentration in ppmv

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

The CEMS shall be installed per the schedule found in Rule 1110.2 Table VII for Compliance Schedule for New or Modified CEMS on Existing Engines.

The CEMS shall comply with requirements of Rule 2012. Once designated as a former RECLAIM facility, the CEMS shall comply with Rule 218.2 and 218.3. If the CEMS is required to be modified in order to comply with Rule 218.2 and 218.3, a CEMS application is required within 90 days of becoming a former RECLAIM facility.

[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019; RULE 2012, 2-5-2016; RULE 218, 5-14-1999; RULE 218, 3-5-2021; RULE 218.1, 5-14-1999; RULE 218.1, 5-4-2012]

[Devices subject to this condition : D14, D16, D17]

E. Equipment Operation/Construction Requirements

E179.1 For the purpose of the following condition number(s), continuously record shall be defined as recording at least once every hour and shall be calculated upon the average of the continuous monitoring for that hour.

Condition Number D 12- 5

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

[Devices subject to this condition : C159, C160, C161]

E193.3 The operator shall upon completion of construction, operate and maintain this equipment as follows:

This permit shall expire if construction of the equipment is not completed within one year of issuance (Revision 21), unless an extension is granted by the Executive Officer.



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

[RULE 205, 1-5-1990]

[Devices subject to this condition : C159, C160, C161]

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

Change oil and filter every 4,320 hours of operation or annually whichever comes first (or according to the oil analysis program in 40 CFR 63.6625 (j)).

Inspect spark plugs every 4,320 hours of operation or annually whichever comes first and replace as necessary, and

Inspect all hoses and belts every 4,320 hours of operation or annually whichever comes first and replace as necessary.

Records shall be maintained according to 40 CFR 63.6655(a) and (e). All records required by these devices shall be retained for a minimum of five years, and shall be made available to any District representative upon request.

[40CFR 63 Subpart ZZZZ, 1-30-2013]

[Devices subject to this condition : D14, D16, D17]

H. Applicable Rules

H23.8 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
NOX	District Rule	1110.2
CO	District Rule	1110.2
VOC	District Rule	1110.2



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The Integrated Air to Fuel Ratio Controller connected with Devices D14, D16, & D17 shall comply with all applicable Inspection and Monitoring requirements as outlined in approved compliance plan under section I of this permit until such time that a CEMS is installed and is operational.

Whether or not explicitly stated on this permit, including, but not limited to, reporting, record keeping, monitoring, source testing, and other criteria defined in approved Rule 1110.2 Inspection and Maintenance plan, start-up shall be defined as 60 minutes from when the fuel is introduced to each engine for combustion.

The NO_x emissions limit shall apply within 24 months after the Permit to Construct is issued (Revision 21), unless an extension is approved in writing by the Executive Officer.

[RULE 1100, 1-10-2020; **RULE 1110.2, 2-1-2008**; RULE 1110.2, 11-1-2019]

[Devices subject to this condition : D14, D16, D17]

H23.10 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR63, SUBPART	ZZZZ

[40CFR 63 Subpart ZZZZ, 1-30-2013]

[Devices subject to this condition : D14, D16, D17]

H23.16 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
NOX	District Rule	1100

[RULE 1100, 1-10-2020; **RULE 1110.2, 2-1-2008**; RULE 1110.2, 11-1-2019]



FACILITY PERMIT TO OPERATE SO CAL GAS CO/PLAYA DEL REY STORAGE FAC

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 : D14, D16, D17]

I. Administrative

- I331.1 The conditions and requirements for this device in Section H shall take effect, and shall supersede those in Section D, when the modifications authorized in Section H are completed. The operator shall notify the AQMD when the modifications are completed.

[RULE 202, 5-7-1976]

[Devices subject to this condition : D14, D16, D17]

K. Record Keeping/Reporting

- K67.4 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

This engine shall comply with the following additional monitoring and record keeping requirements of Rule 1110.2 as outlined below:

1. Total hours of operation
2. Type of gaseous fuel
3. Fuel consumption (cubic feet of gas) and,
4. Cumulative hours of operation since the last source test required in Rule 1110.2

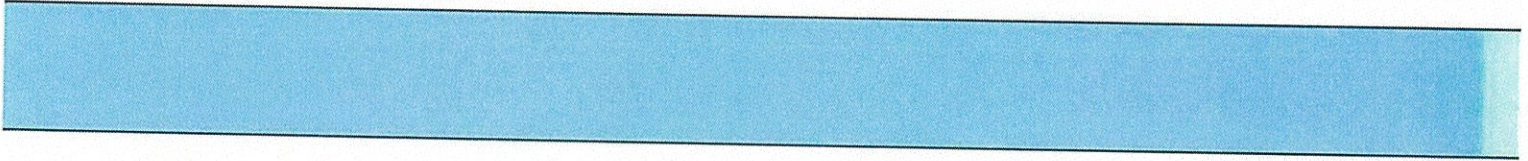
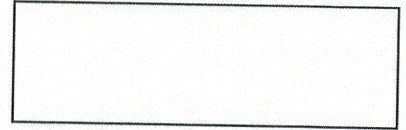
All records required by these devices shall be retained for a minimum of five years, and shall be made available to any District representative upon request.

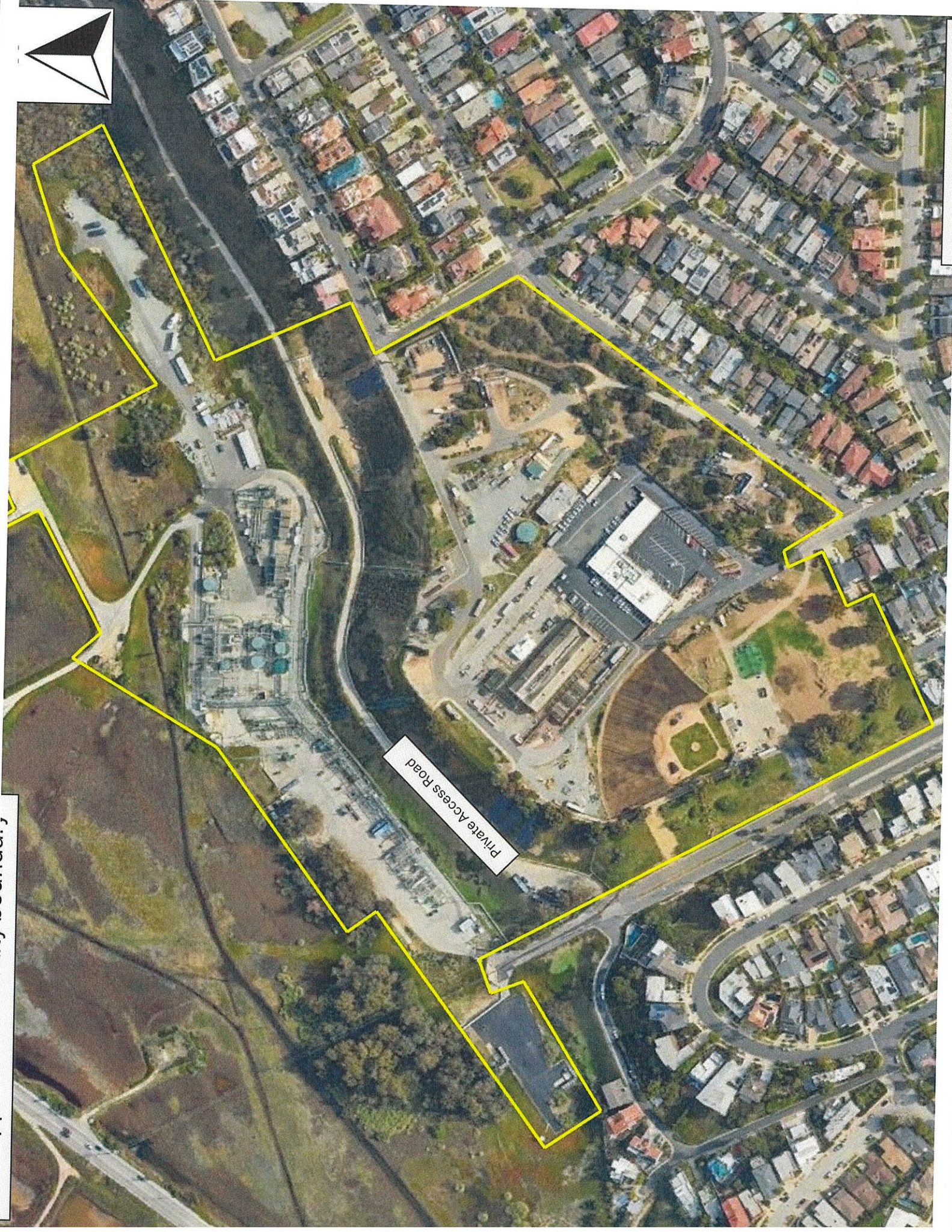
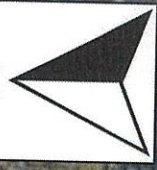
[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019]

[Devices subject to this condition : D14, D16, D17]



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





Private Access Road

San Juan Community Center