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7/23/26

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

SOUTH COAST AQMD
CLERK OF THE BOARDS
2026 JUN 24 P 3:29

PETITIONER: WALNUT CREEK ENERGY LLC

CASE NO: 6230-8

FACILITY ID: 146536

FACILITY ADDRESS: 911 Bixby Dr
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: City of Industry CA 91745

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

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

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

Greg Woffe	George Piantka
Principal Scientist, Yorke Engineering, LLC	Senior Director, NRG
31726 Rancho Viejo Rd, Suite 218	911 Bixby Dr
San Juan Capistrano *Zip* 92675	City of Industry, CA *Zip* 91745
☎ (909) 861-2729 *Ext.*	☎ (760) 707-6833 *Ext.*
Fax ( )	*Fax* ( )
E-mail gwolffe@yorkeengr.com	*E-mail* George.piantka@nrg.com

3. RECLAIM Permit ☒ Yes ☐ No Title V Permit ☒ Yes ☐ No

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

Walnut Creek Energy LLC (WCE) (Facility ID 146536) operates five GE LMS100 simple cycle gas turbines subject to annual relative accuracy test audits (RATA) and ammonia slip testing as required by the permit and SCAQMD rules. Startup was attempted on Unit 1 (Device ID D1) on June 11, 2026, the day of its scheduled

RATA and ammonia slip test. The unit could not establish compliance with the NOx limit within the 35 minutes startup limit, and as a result, the startup was terminated before an emissions exceedance occurred. Startup was attempted twice. During the attempted start-up on June 11, 2026, WCE noted that the initial ammonia flow to the Selective Catalytic Reduction (SCR) system for Unit 1 was higher than experienced during the testing for Units 2-5.

The issue on Unit 1 was investigated by the facility since the attempted start-up on June 11, 2026. On June 18, 2026, it was determined that a replacement sample probe was needed. The RATA test and ammonia slip test are due to be completed by the end of the second quarter of 2026 (Q2 2026) (i.e., June 30, 2026).

Due to the time needed to procure the replacement equipment, the required permitting/certification of the sample probe replacement, and third-party test scheduling, testing will not be completed before June 30, 2026.

WCE is in ongoing coordination with the test company to find time for a test crew to complete the testing, including nights, early morning hours and weekends but we must be mindful that these test crews are already working consecutive days over long hours as we are near the end of the quarter. Availability of a crew that can accommodate additional hours safely is a continuing challenge.

As a result, additional time is needed beyond the deadline for the annual certification and ammonia slip testing required by the permit and SCAQMD rules.

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

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

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

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
GE LMS100 simple cycle gas turbine (Unit 1)	PTO Application No: 636708, PTC Application No: 653918	D1	N/A

*Attach copy of denial letter

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

Gas turbines are dispatched according to local demand, system load, and system reliability requirements dictated by the California Independent System Operator (Cal ISO).

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

If yes, how often: Annually during scheduled outages. Date of last maintenance and/or inspection March 2026

Describe the maintenance and/or inspection that was performed.

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

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

Rule	Explanation
Section D, Permit Condition A195.4 of Facility Permit 146536, applicable to Device D1 [SCAQMD Rule 1303(a)(1)]	Ammonia slip calculation procedures must be validated with an ammonia slip test annually. Due to equipment replacement, the slip test may not be completed as required by June 30, 2026 (end of Q2 2026).
Section D, Permit Condition D29.2 of Facility Permit 146536, applicable to Device D1 [SCAQMD Rules 1303(a)(1) and 2012]	Ammonia testing is required annually by this permit condition. Due to equipment replacement, the slip test may not be completed as required by June 30, 2026 (end of Q2 2026).
Section D, Permit Conditions D82.1 and D82.2 of Facility Permit 146536, applicable to Device D1 [SCAQMD Rules 218.1 and 2012]	These permit conditions require the CEMS to be operated in accordance with the rules, which includes the requirement that the system be certified annual via a relative accuracy test audit (RATA). Due to startup issues with Unit 1, the RATA test cannot be achieved at this time as required by June 30, 2026 (end of Q2 2026).
Section H, Permit Condition A195.4 of Facility Permit 146536, rev 10, applicable to Device D1 [SCAQMD Rule 1303(a)(1)]	Ammonia slip calculation procedures must be validated with an ammonia slip test annually. Due to equipment replacement, the slip test may not be completed by June 30, 2026 (end of Q2 2026).
Section H, Permit Condition D29.2 of Facility Permit 146536, rev 10, applicable to Device D1 [SCAQMD Rules 1303(a)(1) and 2012]	Ammonia testing is required annually by this permit condition. Due to equipment replacement, the slip test may not be completed by June 30, 2026 (end of Q2 2026).

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.

Startup was attempted on Unit 1 on June 11, 2026, the day of its scheduled relative accuracy test audit (RATA) and ammonia slip test. The unit could not establish compliance with the NOx limit within the 35 minutes startup limit, and the startups were terminated before an emissions exceedance occurred. Startup was attempted twice. WCE noted that the initial ammonia flow to the Selective Catalytic Reduction (SCR) system was higher than experienced during the testing for Units 2-5.

NOx emission concentrations from the tester were consistently lower than the WCE analyzer during the initial startup. WCE believes that the sample probe which draws stack gases to the analyzer has fouled. On June 18, WCE initiated the process to replace the sample probe, filing a ST-220 application with SCAQMD and following the certification process to verify sample probe and analyzer performance.

WCE is doing all it can in coordination with the test company to find time for a test crew to complete the testing, including nights, early morning hours and weekends. However, the test crews are already working consecutive days over long hours near the end of the quarter and scheduling a crew that can accommodate additional hours safely is a challenge.

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).

On June 11, 2026, when the scheduled test was not completed and the unit could not complete startup. Subsequent troubleshooting was conducted, and on June 18, 2026 it was determined that a replacement sample probe would be required. The facility consulted with the South Coast AQMD source test group on Friday June 19 to install a new sample probe and a hard copy ST-220 with fees was filed on Wednesday, June 24, 2026.

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.

On June 18, 2026, the facility determined that a replacement sample probe would be required. The facility communicated with Louis Fan in the Source Group to verify the actions required by the facility in association with this equipment replacement. WCE initiated the process to replace the sample probe, filing a ST-220 application with SCAQMD and following the certification process to verify sample probe and analyzer performance.

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: $ Significant daily cost of Unit 1not being operable until testing is complete.

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

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

Denial of the variance would render Unit 1 at Walnut Creek inoperable. Not granting this petition could cause significant, unreasonable, and unavoidable harm to Petitioner in that Petitioner would be unable to operate the units for commercial use and result in significant revenue loss until testing is completed.

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

Unit 1 will not be started up and will remain unavailable for operation until the replacement sample probe is installed and the unit is ready to be tested.

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

* Column A minus Column B = Column C

Excess Opacity: %

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

There will be no excess emissions since Unit 1 cannot be started up at this time. Unit 1 will remain unavailable for operation until the replacement sample probe is installed and the unit is ready to be tested. Once the replacement probe is received, a new date for testing will be scheduled.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

N/A

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

The CEMS equipment will continue to operate under the permit conditions during the variance period and will quantify emission levels as required.

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.

A new date for testing will be scheduled at the soonest date possible with the third-party test firm once the replacement sample probe is installed and the unit is ready to be tested.

24. State the date you are requesting the variance to begin: June 30, 2026; and the date by which you expect to achieve final compliance: December 31, 2026.

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

List Increments of Progress here:

June 11, 2026: Unit 1 could not start up on scheduled test day.
June 18, 2026: Facility determined equipment replacement probe is required for Unit 1. Equipment was ordered and ST-220 form was initiated.
Ongoing: Facility working with test firm to schedule a new testing date for Unit 1 as soon as possible.

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.

Louis Fan Ext. 2728

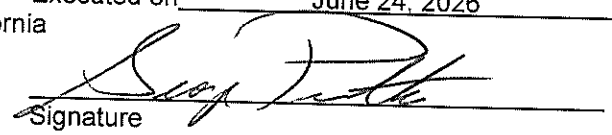
Ext.

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

Greg Wolffe	Yorke Engineering, LLC	Principal Scientist
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 June 24, 2026, at Diamond Bar, California



Signature

George Piantka
Print Name

Title: Senior Director, Regulatory Environmental Services

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

A195.4 The 5.0 PPMV NH3 emission limit(s) is averaged over 60 minutes at 15% O2, dry basis. The operator shall calculate and continuously record the NH3 slip concentration using the following:.

NH3 (ppmv) = [a-b*c/1EE+06]*1EE+06/b; where

a = NH3 injection rate (lb/hr)/17 lb-lb-mol

b = dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol

c = change in measured NOx across the SCR (ppmvd at 15% O2)

The operator maintain a NOX analyzer to measure the SCR inlet NOx ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months.

The operator shall use the above described method or other alternative method apporoved by the Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

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 ammonia CEMS is installed, the ammonia slip calculation and annual ammonia slip testing requirement shall no longer be required..

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 2012, 2-5-2016]**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

[RULE 1110.2, 2-1-2008; RULE 1110.2, 11-1-2019; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 1304(c)-Offset Exemption, 6-14-1996;** RULE 1470, 10-1-2021; **RULE 2012, 2-5-2016; 40CFR 60 Subpart IIII, 6-29-2021]**

[Devices subject to this condition : D34]

D12.6 The operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage of the engine.

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

[RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 1304(c)-Offset Exemption, 6-14-1996; RULE 2012, 2-5-2016]

[Devices subject to this condition : D34]

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

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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 test shall be performed at least annually. If the results of any annual test show noncompliance then quarterly tests shall be conducted until at least 4 consecutive quarterly tests show compliance, at which time annual tests may be resumed.

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 measured over a 60 minute averaging time period

The test shall be conducted to determine compliance with the Rule 1303 BACT concentration limit.

Source test results shall be submitted to the District no later than 60 days after the source test was conducted. Emission data shall be expressed in terms of concentration (ppmv) corrected to 15 percent oxygen (dry basis) and mass rate (lb/hr). All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute. All moisture concentration shall be expressed in terms of percent corrected to 15 percent oxygen.

Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (CFH), the flue gas temperature, and the generator power output (MW) under which the test was conducted.

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

[Devices subject to this condition : D1, D7, D13, D19, D25]

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

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

that it is more accurate than unmodified SCAQMD method 25.3, nor does it mean that it may be used in lieu of SCAQMD Method 25.3 without prior approval, except for the determination of compliance with the BACT level of 2.0 ppmv VOC calculated as carbon for natural gas fired turbines.

The test results shall be reported with two significant digits

For the purpose of this condition, alternative test method may be allowed for each of the above pollutants upon concurrence of SCAQMD, EPA, and CARB.

Source test results shall be submitted to the District no later than 60 days after the source test was conducted. Emission data shall be expressed in terms of concentration (ppmv) corrected to 15 percent oxygen (dry basis), mass rate (lb/hr), and lb/MMCF. All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute. All moisture concentration shall be expressed in terms of percent corrected to 15 percent oxygen.

Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (CFH), the flue gas temperature, and the generator power output (MW) under which the test was conducted.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; **RULE 1703(a)(2) - PSD-BACT, 10-7-1988]**

[Devices subject to this condition : D1, D7, D13, D19, D25]

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

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

CO concentration in ppmv

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

The CEMS shall be operated in accordance with an approved AQMD Rule 218 CEMS plan application.

The CEMS shall be operated to measure CO concentrations over a 15 minute averaging time period.

The CEMS will convert the actual CO concentrations to mass emission rates (lb/hr) using the equation below and record the hourly emission rates on a continuous basis

CO Emission Rate, lb/hr = K Cco Fd[20.9/(20.9% - %O2 d)][(Qg*HHV)/106], where

K = 7.267EE-8 (lb/scf)/ppm

Cco = Average of four consecutive 15 min ave CO concentration, ppm

Fd = 8710 dscf/MMBTU natural gas

%O2 d = Hourly ave % by volume O2, dry corresponding to Cco

Qg = Fuel gas usage during the hour, scf/hr

HHV = Gross high heating value of fuel gas, BTU/scf

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 218, 5-14-1999; RULE 218.1, 5-14-1999; RULE 218.1, 5-4-2012]

[Devices subject to this condition : D1, D7, D13, D19, D25]

D82.2 The operator shall install and maintain a CEMS to measure the following parameters:

FACILITY PERMIT TO OPERATE
WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

CONTAMINANT	EMISSIONS LIMIT
PM10	Less than or equal to 2,592 LBS IN ANY ONE MONTH
VOC	Less than or equal to 1035 LBS IN ANY ONE MONTH

The operator shall calculate the monthly emissions for PM10 and VOC using the equation below and the following emission factors: VOC: 2.82 lb/mmcf; and PM10: 7.07 lb/mmcf

Monthly Emissions, lb/month = (Q) x (EF),

Where Q = monthly fuel usage, mmscf/month and EF = emission factor indicated above

For the purposes of this condition, the limits shall based on the emissions from a single turbine.

[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 : D1, D7, D13, D19, D25]

A195.4 The 5.0 PPMV NH3 emission limit(s) is averaged over 60 minutes at 15% O2, dry basis. The operator shall calculate and continuously record the NH3 slip concentration using the following:.

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

NH3 (ppmv) = [a-b*c/1EE+06]*1EE+06/b; where

a = NH3 injection rate (lb/hr)/17 lb-lb-mol

b = dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol

c = change in measured NOx across the SCR (ppmvd at 15% O2)

The operator maintain a NOX analyzer to measure the SCR inlet NOx ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months.

The operator shall use the above described method or other alternative method apporoved by the Executive Officer.

The ammonia slip calculation procedures described above shall not be used for compliance determination or emission information without corroborative data using an approved reference method for the determination of ammonia.

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 ammonia CEMS is installed, the ammonia slip calculation and annual ammonia slip testing requirement shall no longer be required..

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 201: 2-5-2016]**

[Devices subject to this condition : C4, C10, C16, C22, C28]

A195.6 The 15 PPMV NOX emission limit(s) is averaged over over 4 hours rolling at 15 percent O2, dry..

[40CFR 63 Subpart KKKK, 4-20-2006]

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 continuously monitor the temperature. The operator shall also install and maintain a device to continuously record the exhaust temperature. Continuously record shall be defined as recording at least once every hour and shall be calculated based upon the 60 minute rolling 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 temp shall remain above 480 degrees F, except during start-up and shutdown periods.

This condition shall become effective no later than 180 days after the completion of recommissioning for each turbine.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 1303(b)(2)-Offset, 5-10-1996;** RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : C3, C9, C15, C21, C27]

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

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 test shall be conducted to determine compliance with the Rule 1303 BACT concentration limit.

The test shall be conducted when this equipment is operating at as close to 100 percent load as possible but not less than 90%.

The test shall be performed at least annually, except as follows: The test shall be conducted at least quarterly during the first twelve months after SCR replacement starting in 2024. Testing may be conducted annually after 4 successful quarterly tests. If the results of any annual test show noncompliance, then quarterly tests shall be conducted until at least 4 consecutive quarterly tests show compliance, at which time annual tests may be resumed.

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 measured over a 60 minute averaging time period

Source test results shall be submitted to the District no later than 60 days after the source test was conducted. Emission data shall be expressed in terms of concentration (ppmv) corrected to 15 percent oxygen (dry basis) and mass rate (lb/hr). All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute. All moisture concentration shall be expressed in terms of percent corrected to 15 percent oxygen.

Source test results shall also include the oxygen levels in the exhaust, fuel flow rate (CFH), the flue gas temperature, and the generator power output (MW) under which the test was conducted.

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

[Devices subject to this condition : D1, D7, D13, D19, D25]

Clerk of Board

From: Greg Wolffe <gwolffe@yorkeengr.com>
Sent: Tuesday, June 30, 2026 10:47 AM
To: Clerk of Board; Clerk of Board
Cc: Paul Liao; Eduardo Jimenez; Wood, Brian; Sisk, Tim; Piantka, George; Grace M. Leblanc; Sinde Hooten
Subject: [EXTERNAL] RE: Walnut Creek Energy LLC Petition 6230-8

Dear Madam Clerk.

We understand that the Ex Parte Emergency Variance for the subject case was approved last Friday, June 26, 2026, as requested in our e-mail below. We appreciate working with the clerk and the South Coast AQMD prosecutors' office (copied) on the final conditions and approval of the variance.

We would like to set a hearing date of Thursday, July 23, 2026, for the Short Variance. With the recent installation on a sampling probe, following approval by the South Coast AQMD Source Testing Group, the petitioner (Walnut Creek Energy) expects to conduct testing as early as July 13/14. If the RATA and ammonia slip testing on Unit 1 passes, the hearing may be canceled, however we would like to proceed with scheduling the Short Variance hearing date in the even that continued relief is required.

Please confirm that the proposed date is available on the Hearing Board calendar and let me know if you have any questions.

Thank you for your time.
Greg

Yorke Service Areas Include: Air Quality, Storm Water, Hazardous Waste, Industrial Hygiene-Safety, and CEQA Technical Reports. For a more detailed list: www.YorkeEngr.com/Services.

Greg Wolffe, CPP | Diamond Bar Office
Principal Scientist
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Yorke® ENGINEERING, LLC

Specializing in Air Quality and EH&S Services

From: Greg Wolffe
Sent: Thursday, June 25, 2026 10:00 AM

To: Piantka, George <George.Piantka@nrg.com>; Clerk of Board <front_pc@aqmd.gov>; ClerkOfBoard@aqmd.gov
Cc: Paul Liao <pliao@yorkeengr.com>; Eduardo Jimenez <ejimenez@yorkeengr.com>; Wood, Brian <Brian.Wood@nrg.com>; Sisk, Tim <Tim.Sisk@nrg.com>
Subject: RE: Walnut Creek Energy LLC Petition 6230-8

Dear Madam Clerk. As we discuss today on the phone, after additional review of the need for relief on a short-term basis, please proceed with this as an Ex Parte and Short Variance request.

Please send a payment voucher at your earliest convenience.

Thank you.
Greg

Yorke Service Areas Include: Air Quality, Storm Water, Hazardous Waste, Industrial Hygiene-Safety, and CEQA Technical Reports. For a more detailed list: www.YorkeEngr.com/Services.

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Yorke ENGINEERING, LLC

Specializing in Air Quality and EH&S Services

From: Piantka, George <George.Piantka@nrg.com>
Sent: Wednesday, June 24, 2026 4:32 PM
To: Clerk of Board <front_pc@aqmd.gov>; ClerkOfBoard@aqmd.gov
Cc: Greg Wolffe <gwolffe@yorkeengr.com>; Paul Liao <pliao@yorkeengr.com>; Eduardo Jimenez <ejimenez@yorkeengr.com>; Wood, Brian <Brian.Wood@nrg.com>; Sisk, Tim <Tim.Sisk@nrg.com>
Subject: Re: Walnut Creek Energy LLC Petition 6230-8

To Clerk of Board,
After discussing this petition further, it is agreed that we will and can switch to interim variance/regular variance since the Hearing Board can hear the case on June 30. Regular variance notification can proceed following the hearing as there will be ample time during the term of an interim variance to complete the notification. The second quarter 2026 ends June 30, 2026 at 11:59 PM when our testing requirement is to be met. A hearing on June 30 will ensure the matter will be heard ahead of the end of quarter. Please amend the petition to remove ex parte and emergency variance references.

Best Regards
George.Piantka@nrg.com

760-707-6833

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From: Piantka, George <George.Piantka@nrg.com>
Sent: Wednesday, 24 June 2026 15:56:48
To: Clerk of Board <front_pc@aqmd.gov>; ClerkOfBoard@aqmd.gov <ClerkOfBoard@aqmd.gov>
Cc: Greg Wolffe <gwolffe@YorkeEngr.com>; Paul Liao <pliao@yorkeengr.com>; Eduardo Jimenez <ejimenez@yorkeengr.com>; Wood, Brian <Brian.Wood@nrg.com>
Subject: Fw: Walnut Creek Energy LLC Petition 6230-8

To Clerk of Board, SCAQMD
Attached is an electronic file of 6230-8 Petition submitted by Walnut Creek Energy LLC this afternoon, June 24, 2026. The variance should be an Ex Parte Emergency Variance / Regular Variance due to regulatory relief sought starting June 30. (Rosalinda - I checked Ex Parte Emergency following guidance received at the Clerk's office.) Walnut Creek is seeking from June 30 deadline to complete RATA and ammonia slip testing by June 30. Yorke Engineering (Greg Wolffe) is representing the petitioner.

Please contact me or Greg Wolffe if you have any questions.

Best Regards
George Piantka
760-707-6833

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From: Yorke Engineering DB Scanner <mfp@yorkeengr.com>
Sent: Wednesday, June 24, 2026 3:43 PM
To: Greg Wolffe <GWolffe@YorkeEngr.com>; Piantka, George <george.piantka@nrg.com>; Paul Liao <PLiao@YorkeEngr.com>
Subject: Walnut Creek Energy LLC Petition 6230-8

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