

DOCKETED

Docket Number:	85-AFC-03C
Project Title:	Compliance - Application for Certification for Midway-Sunset Cogeneration Project
TN #:	269990
Document Title:	MSCC 85-AFC-03C 1st Quarter 2025 AQR
Description:	N/A
Filer:	Stephanie Urias
Organization:	Midway Sunset Cogeneration Company
Submitter Role:	Applicant
Submission Date:	5/15/2026 9:26:53 AM
Docketed Date:	5/15/2026

MIDWAY SUNSET COGENERATION COMPANY

**1st QUARTER AIR QUALITY REPORT
2025**

SUBMITTED: April 30, 2025



April 28, 2025

CC- 2277

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Compliance Project Manager
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*In support of conservation, MSCC is submitting the quarterly air quality report electronically (CD). A hard copy is available on request.

**Air Quality Compliance Manager report was submitted using PAS Facility Portal.

***Supplied on MSCC Portal for Retrieval.

**Subject: MIDWAY SUNSET COGENERATION COMPANY (MSCC)
Quarterly Air Quality Compliance Report
First Quarter 2025 (January, February & March)**

**Reference: CEC Docket 85-AFC-3; Condition N. A 21
SJVAPCD PTO's S-1135-0-5, S-1135-224-30, S-1135-225-29, S-1135-226-28, S-1135-230-5, S-1135-231-7, S-1135-235-5, and EPA PSD
Permit SJ 87-01**

This report documents MSCC's air quality performance for the quarter ending March 31, 2025. The report includes data from the operation of Unit A, Unit B and Unit C as simple cycle/peaking units. MSCC is now a peaking power generation facility with three natural gas fired combustion turbine generators (CTGs) authorized under Permits to Operate S-1135-224 (Unit A), ' -225 (Unit B) and ' - 226 (Unit C). MSCC was originally designed and operated as a cogeneration facility with the CTGs producing steam and power for the adjacent oil field and power for the California grid operated by the California Independent System Operator (CAISO). Steam demand has decreased over the years and power demand has increased. In response to the lessened steam demand, MSCC, in 2013/14, applied for and received permission from the District and the California Energy Commission (CEC), to convert Units A and B to simple cycle/peaking units. The conversion to simple cycle/peaking units required each unit's exhaust stream to bypass the Heat Recovery Steam Generator (HRSG) which due to design also bypasses the Selective Catalytic Reduction (SCR) grid used to control NOx emissions. MSCC, at considerable expense, installed leading edge combustion technology to control Unit A and Unit B NOx emissions within permitted limits absent the aid of the SCR grid.

Steam demand continued to decrease to the point that MSCC no longer has a steam contract and Unit C, which was never converted to the leading edge combustion technology, could no longer supply power to the grid without exceeding permitted NOx limits. MSCC explored several options for a resolution to Unit C being forced offline (On December 9, 2021, MSCC filed at FERC a notice of relinquishment of Qualifying Facility (QF) status FERC Docket No. QF 86-433-008). The options ranged from complete mothballing/retirement of Unit C to a commitment of a large financial investment to convert Unit C to the latest combustion technology. Due to the anticipated shortfall of capacity on the electrical grid, CAISO denied the mothball request for Unit C and requested that Unit C along with Units A and B be available to operate commencing February 1, 2021 as a Reliability Must-Run (RMR) Unit. At the time and while coordinating with CAISO, MSCC determined that the most workable near term solution was to seek a variance for Unit C limiting operation to only those hours of the year when CAISO has declared an Exceptional Dispatch Emergency. The granting of this variance would allow MSCC to operate Unit C in bypass mode and continue supplying power to California's grid long enough for MSCC to determine a permanent fix to Unit C's operating challenge. MSCC was granted the requested Unit C variance (S-21-02R) by the District on March 11, 2021. Unit C would be able to respond to CAISO's requested run time under Variance S-21-02R until March 9, 2022. One of the conclusions and orders of the variance (condition #4), was to postpone Unit C annual source test until it could operate in compliance. MSCC continued to perform a CGA every Quarter on Unit C until Unit C was able to operate in compliance. CGA test reports are available on request. After receiving the variance, one of the owners of MSCC added an additional requirement that CAISO, obtain a Department of Energy (DOE), per the Federal Powers Act (FPA), 202(c) Emergency Order to provide MSCC the ability to operate Unit C outside of emissions compliance without risk of EPA enforcement action. On September 10, 2021, one such order was issued by the DOE and was in effect until November 9, 2021. Under the Order, MSCC performed one test run that lasted 1 hour and 7 minutes.

MSCC eventually committed to converting Unit C to the latest combustion technology and issued a purchase order to the original equipment manufacturer (OEM) to complete the conversion. To allow this conversion, MSCC received from the District, a "Notice of final decision for the issuance of an Authority to Construct and significant modification of federally mandated operating permit" for converting Unit C to the same combustion technology as that installed in Units A and B. Concurrently an application for a post Certification Amendment of MSCC's operating license was submitted to and approved by the CEC.

MSCC was unable to complete Unit C's combustion conversion within the time frame allowed by the regular variance. MSCC applied for an extension to the variance to cover the completion of Unit C's combustion upgrade and to offset Unit C's annual source test requirement until Unit C could operate within permitted limits. During the review of the information regarding the variance extension the district requested that Unit C be classified as a Dormant Emissions Unit (DEU). This classification would continue the postponement of Unit C's source test requirement and still allow MSCC to convert Unit C's combustion system. MSCC applied for an ATC classifying Unit C as a DEU.

MSCC Unit C was designated a Dormant Emissions Unit by the District on April 11, 2022, (S-1135-226-30). MSCC submitted to the District Unit C Title V Minor Modification Application to incorporate commissioning period in ATC S-1135-226-31. Following successful commissioning of Unit C, MSCC will be able to run Unit C within permitted limits and Unit C can be reclassified as active. The Unit C Conversion outage began on May 25, 2022.

MSCC successfully completed the combustion conversion of Unit C on July 13, 2022. Commissioning tests on the Unit commenced on July 14, with the Unit released for operation to service CAISO grid needs on July 17, 2022. CAISO immediately began dispatching Unit C for operation. Unit C successfully completed an Annual Source/RATA test on August 18, 2022. Since July 17, 2022, Unit C has been available to operate to support the CAISO grid needs. During the September 2022 heat wave all three MSCC Units reliably provided power to the CAISO grid.

MSCC completed RMR service to the CAISO on December 31, 2022. MSCC began market operations as a Resource Adequacy capacity simple cycle peaking facility on January 1, 2023.

Sincerely



Lowell Pollema
Executive Director

cc: File CC-2277
G. Jans
Compliance Office

AIR QUALITY COMPLIANCE SCHEDULE

<u>TEST/DOCUMENTATION</u>	<u>PERIOD REQUIRED</u>	<u>NEXT DUE</u>
Quarterly Report to EPA, APCD, CEC, CARB	Quarterly	July '25
Calibration Gas Audit	Quarterly	July '25
Annual Source Tests	Annually	April '25
CEM Re-Certification 1. Relative Accuracy Test Audit 2. Relative Accuracy Audit 3. System Appraisal (at CEM)	Annually	April '25
Daily Audit of CEM Reporting	Daily	Internal/records available on request
Calibration Drift Test	Daily	Internal/records Available on request

PTO S-1135-0-5

San Joaquin Valley Air Pollution Control District

FACILITY: S-1135-0-5

EXPIRATION DATE: 05/31/2026

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring, where applicable, that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name AERA ENERGY LLC
Location HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA
S-1135-0-5 Apr 12/2022 8:10AM HONGAM

11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all e)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall manufacture, blend, repack, supply, sell, solicit or apply any architectural coating not exempt as allowed by Sections 4.1 and 4.2 of Rule 4601 with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
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36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced) and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. Facilities S-1135 and S-1547 constitute one stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
43. On August 31, 2002, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin August 31 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
44. STEAM GENERATOR FUEL MONITORING CONDITION: For units equipped with post-combustion SO₂ control equipment (e.g. SO₂ scrubber), annual source testing shall be performed to measure SO₂ concentration in the exhaust or SO₂ control efficiency using EPA Methods 6, 6C, 8 or ARB Method 100. SO_x control efficiency determination shall follow procedure in Section 6.2.8 of Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
45. STEAM GENERATOR FUEL MONITORING CONDITION: For units not equipped with post-combustion SO₂ control equipment (e.g. SO₂ scrubber), each fuel source shall be tested for sulfur annually using ASTM D 1072, D 3031, D 4084, or D 3246, D 6228, D 5504, EPA Method 11 or 15, or grab sample analysis by double GC for H₂S and mercaptans. [District Rule 4320] Federally Enforceable Through Title V Permit
46. STEAM GENERATOR GENERAL CONDITION: Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
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47. **STEAM GENERATOR GENERAL CONDITION:** Emission rates during startup, shutdown and refractory curing shall not exceed any of the following: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2,000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, and 4406] Federally Enforceable Through Title V Permit
48. **STEAM GENERATOR PERIODIC MONITORING CONDITION:** The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. If the unit is equipped with flue gas recirculation (FGR), measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
49. **STEAM GENERATOR PERIODIC MONITORING CONDITIONS:** If the NO_x and/or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
50. **STEAM GENERATOR PERIODIC MONITORING CONDITION:** All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
51. **STEAM GENERATOR PERIODIC MONITORING CONDITION:** The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
52. **STEAM GENERATOR PERIODIC MONITORING CONDITION:** All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
53. **STEAM GENERATOR SOURCE TESTING CONDITION:** The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

54. STEAM GENERATOR SOURCE TESTING CONDITION: The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
55. STEAM GENERATOR SOURCE TESTING CONDITION: For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
56. STEAM GENERATOR SOURCE TESTING CONDITION: The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
57. STEAM GENERATOR SOURCE TESTING CONDITION: Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
58. STEAM GENERATOR GENERAL CONDITION: If the unit is equipped with flue gas recirculation (FGR), whenever the unit is switched to operate with the FGR system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR system in the closed position has occurred within the previous 36 months. [District Rule 1070] Federally Enforceable Through Title V Permit
59. TEOR SYSTEM CONDITION: The crude oil production from wells associated with this permit unit shall not lie within 1,000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
60. TEOR SYSTEM CONDITION: The fugitive emissions component inspection and reinspection requirements of Section 5.4.1 through Section 5.4.6 of this rule shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight or less (≤10 wt.%), as determined by the test methods in Section 6.3.4. [District Rule 4401] Federally Enforceable Through Title V Permit
61. TEOR SYSTEM CONDITION: During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
62. TEOR SYSTEM CONDITION: The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
63. TEOR SYSTEM CONDITION: An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: 1) The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system. The well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emission to atmosphere, or 2) the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system. [District Rule 4401, 5.1] Federally Enforceable Through Title V Permit

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64. TEOR SYSTEM CONDITION: There shall be no open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.1] Federally Enforceable Through Title V Permit
65. TEOR SYSTEM CONDITION: There shall be no components with a major liquid leak as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.2.2.2] Federally Enforceable Through Title V Permit
66. TEOR SYSTEM CONDITION: There shall be no components with a gas leak of greater than 50,000 ppmv. [District Rule 4401, 5.2.2.3] Federally Enforceable Through Title V Permit
67. TEOR SYSTEM CONDITION: An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
68. TEOR SYSTEM CONDITION: No leaking components (as defined in Section 5.2.2 of Rule 4401) may be used unless they have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
69. TEOR SYSTEM CONDITION: Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
70. TEOR SYSTEM CONDITION: An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this Rule. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
71. TEOR SYSTEM CONDITION: An operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 1) An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 2) Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this Rule. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit
72. TEOR SYSTEM CONDITION: The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.4.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
73. TEOR SYSTEM CONDITION: Components located in unsafe areas shall be inspected and repaired at the next process unit turnaround and inaccessible components shall be inspected at least annually. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit

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74. TEOR SYSTEM CONDITION: Upon detection of a leak, an operator shall affix a readily visible weatherproof tag to that leaking component that includes the following information: 1) The date and time of leak detection; 2) The date and time of the leak measurement; 3) For a gaseous leak, the leak concentration in ppmv; 4) For a liquid leak, whether it is a major or minor liquid leak; and 5) Whether the component is an essential component, and unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
75. TEOR SYSTEM CONDITION: The tag shall remain affixed to the leaky component until all the following requirements are met: 1) The component is repaired or replaced, 2) The component is re-inspected as set forth in Section 6.3, and 3) The component is found to be in compliance with Rule 4401. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
76. TEOR SYSTEM CONDITION: An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] Federally Enforceable Through Title V Permit
77. TEOR SYSTEM CONDITION: Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0, an operator shall comply with at least one of the following three requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: 1) Repair or replace the leaking component, 2) Vent the leaking component to a VOC collection and control system as defined in Section 3.0, or 3) Remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
78. TEOR SYSTEM CONDITION: The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
79. TEOR SYSTEM CONDITION: The time of the initial leak detection shall be the start of the repair period specified in Table 3. [District Rule 4401, 5.5.6] Federally Enforceable Through Title V Permit
80. TEOR SYSTEM CONDITION: If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
81. TEOR SYSTEM CONDITION: The operator of any steam-enhanced crude oil production well shall maintain records of 1) the date and well identification where steam injection or well stimulation occurs; and 2) a listing of all steam enhanced wells connected to this system (updated annually within 60 days of permit anniversary). [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
82. TEOR SYSTEM CONDITION: An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
83. TEOR SYSTEM CONDITION: Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
84. TEOR SYSTEM CONDITION: The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401, 6.1.6 & 6.5] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
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85. TEOR SYSTEM CONDITION: An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive these source testing requirements if the vapor control system does not exhaust to atmosphere, or if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, and internal combustion engine, or in a smokeless flare. [District Rule 4401, 6.2.1 & 6.2.2] Federally Enforceable Through Title V Permit
86. TEOR SYSTEM CONDITION: The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
87. TEOR SYSTEM CONDITION: VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
88. TEOR SYSTEM CONDITION: Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
89. TEOR SYSTEM CONDITION: The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.4] Federally Enforceable Through Title V Permit
90. TEOR SYSTEM CONDITION: The operator shall maintain an inspection log in which the operator records at least all of the following for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type, 2) The location, type and name or description of each leaking component and description of any unit where the leaking component is found, 3) The date of leak detection and the method of leak detection, 4) For gaseous leaks, the leak concentration in ppmv and, for liquids leaks, whether the leak is major or minor, 5) The date of repair, replacement or removal from operation of leaking components, 6) The identity and location of essential components and critical components as defined in this Rule, found leaking, that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than 1 year after detection, whichever comes earlier, 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or replaced, 9) The inspectors name, business mailing address, and business telephone number, and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
91. TEOR SYSTEM CONDITION: By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
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92. TEOR SYSTEM CONDITION: Each hatch shall be closed at all times except during attended repair, replacement, or maintenance operations, providing such activities are done as expeditiously as possible with minimal spillage or material and VOC emissions into the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit

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Facility Name AERA ENERGY LLC
Location HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA
S-1135-0-5 Apr 1 2022 8:40AM - HONGM

PTO S-1135-224-30



San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-224-30

EXPIRATION DATE: 05/31/2026

SECTION: 17 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

78.2 MW COGENERATION UNIT A WITH GE MODEL G7111E FRAME 7E GAS TURBINE ENGINE WITH DRY LOW NOX COMBUSTORS (DLN1+ TURNDOWN ENHANCE), SELECTIVE CATALYTIC REDUCTION (SCR), AND UNFIRED HEAT RECOVERY STEAM GENERATOR (HRSG)

PERMIT UNIT REQUIREMENTS

1. CTG exhaust after the SCR unit shall be equipped with continuously recording emissions monitors dedicated to this unit for NO_x, CO, and O₂. Continuous emissions monitors shall meet the requirements of 40 CFR Part 60, Appendices B and F, and 40 CFR Part 75, and shall be capable of monitoring emissions during startups and shutdowns as well as normal operating conditions. If relative accuracy of CEM(s) cannot be demonstrated during startup conditions, CEM results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
2. CTG shall be equipped with a continuously recording emission monitor preceding the SCR module measuring NO_x concentration for the purposes of calculating ammonia slip. Permittee shall check, record, and quantify the calibration drift (CD) at two concentration values at least once daily (approximately 24 hours) when SCR is operated. The calibration shall be adjusted whenever the daily zero or high-level CD exceeds 5%. If either the zero or high-level CD exceeds 5% for five consecutive daily periods, the analyzer shall be deemed out-of-control. If either the zero or high-level CD exceeds 10% during any CD check, analyzer shall be deemed out-of-control. If the analyzer is out-of-control, the permittee shall take appropriate corrective action and then repeat the CD check. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
3. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Heat recovery steam generator design shall provide space for additional selective catalytic reduction catalyst and oxidation catalyst if required to meet NO_x and CO emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
5. When SCR is operated, permittee shall monitor and record exhaust gas temperature at selective catalytic reduction and oxidation catalyst inlets. [District Rule 2201] Federally Enforceable Through Title V Permit
6. When SCR is operated, ammonia shall be injected whenever the selective catalytic reduction system catalyst temperature exceeds the minimum ammonia injection temperature recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas turbine engine shall be equipped with fuel consumption monitor recorder accurate to +/- 3%. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CEM for NO_x (as NO₂) and CO shall conform to Rule 1080 specifications. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
9. HRSG exhaust stack shall be equipped with permanent stack sampling provisions adequate to facilitate testing consistent with EPA test methods. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. Flue gas ducting from engine to HRSG shall have no provisions for introduction of dilution air. [District Rule 1110] Federally Enforceable Through Title V Permit
11. Lube oil cooler/accumulation vent shall be equipped with control device(s) approved by the APCO sufficient to prevent emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Lube oil cooler/accumulator vent(s) shall not have detectable emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Natural gas sulfur content shall not exceed 0.31 gr/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. All CEM's shall be calibrated and operated according to EPA guidelines as specified in 40 CFR 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
15. Quarterly CEM reports shall be submitted to the APCO according to EPA regulations as specified in 40 CFR 60 Appendix B. [District Rule 4001 and District rule 1080, 8.0] Federally Enforceable Through Title V Permit
16. Audits of all monitors shall be conducted by independent laboratory in accordance with EPA guidelines and witnessed by District. Reports shall be submitted to District within 60 days of audits. [District Rule 1080] Federally Enforceable Through Title V Permit
17. All notification, recordkeeping, performance tests, reporting requirements, and compliance testing requirements of Rule 4001 NSPS shall be satisfied. [District Rule 4001] Federally Enforceable Through Title V Permit
18. Operational records including fuel type, fuel characteristics, and consumption shall be maintained and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
19. Accurate records of NO_x (as NO₂) and CO flue gas concentration corrected to 15% O₂ and fuel gas sulfur content shall be maintained and shall be reported as described in Rule 1080 upon request. [District Rule 1080] Federally Enforceable Through Title V Permit
20. Emission rates shall not exceed the following: PM₁₀: 0.010 lb/MMBtu, SO_x (as SO₂): 0.001 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu, VOC: 0.009 lb/MMBtu, CO: 0.057 lb/MMBtu, and ammonia - 10 ppmvd @ 15%O₂. [District Rules 2201, 4201; and Kern County Rule 404] Federally Enforceable Through Title V Permit
21. Permittee shall comply with the following emission limit at all times except during periods of start-up, shutdown, or reduced load: NO_x (as NO₂): 5.0 ppmv, and CO: 25 ppmv, dry @ 15% O₂ corrected to ISO conditions. [40 CFR 60.332(a)(1) & 60.332(a)(2) and District Rule 4703] Federally Enforceable Through Title V Permit
22. Gas turbine engine start-up is that period of time not exceeding two hours in duration during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
23. Gas turbine engine shutdown is that period of time not exceeding two hours in duration during which the unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
24. Gas turbine reduced load period is that period not exceeding one hour in duration during which the unit is operated at less than rated capacity in order to change the position of the exhaust gas diverter gate. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
25. Compliance with NO_x and CO emission limits shall be demonstrated by District-witnessed sample collection by independent testing laboratory on an annual basis. Compliance with NO_x, CO and ammonia emissions limits shall be demonstrated by District-witnessed sample collection by independent testing laboratory within 60 days of any use of the SCR system, unless compliance with emissions limitations has been demonstrated with the SCR system in operation within the preceding 12 month period. [District Rule 4703 and 1081] Federally Enforceable Through Title V Permit

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26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. The following test methods shall be used PM10: EPA method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA method 10 (or 10B) or CARB Method 100, O2: EPA Method 3, 3A, or 20, VOC: EPA method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081, 40 CFR 60.335 (b), and District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
28. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 = $((a-(bxc/1,000,000)) \times 1,000,000 / b) \times d$, where a = ammonia injection rate(lb/hr)/17(lb/lb. mol), b = dry exhaust gas flow rate (lb/hr)/(29(lb/lb. mol), c = change in measured NOx concentration ppmv at 15% O2 across catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip. [District Rule 4102] Federally Enforceable Through Title V Permit
29. Official test results and field data shall be submitted within 60 days after collection. [District Rule 4703 and District Rule 1081] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4703] Federally Enforceable Through Title V Permit
31. CEC emission rates, except during periods of startup, shutdown, or reduced load shall not exceed PM10: 9.98 lb/hr, SOx (as SO2): 0.92 lb/hr, NOx (as NO2): 17.66 lb/hr, VOC: 9.00 lb/hr, and CO: 54.91 lb/hr. [District Rules 2080 and 4703, and 40 CFR 60] Federally Enforceable Through Title V Permit
32. For CEC purposes, emissions during periods of startup and shutdown shall not exceed the following values average over 2 hours: NOx: 140 lb/hr, and CO: 94 lb/hr. [District Rule 2080] Federally Enforceable Through Title V Permit
33. The CEC shall be notified of any changes to the combined annual emission limits for cogeneration units S-1135-224, -225, and -226, only to the extent to be informed of their impact on the Midway-Sunset Cogeneration Facility. [District Rule 2080] Federally Enforceable Through Title V Permit
34. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [Kern County Rule 108 and District Rule 1080] Federally Enforceable Through Title V Permit
35. Records shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEM's that have been installed pursuant to District Rule 1080, and emission measurements. [Kern County Rule 108; District Rules 1080 and 4703; 40 CFR 60.7 (b)] Federally Enforceable Through Title V Permit
36. The permittee shall maintain hourly average records of NOx and CO emissions. Compliance with the hourly, daily, and twelve month rolling average VOC emission limits shall be demonstrated by the CO CEM data and the VOC/CO relationship determined by annual CO and VOC source tests of NOx, CO, and ammonia emission concentrations (ppmv @ 15% O2), and hourly, daily, and twelve month rolling. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. A violation of NOx emission standards indicated by the NOx CEM shall be reported by the operator to the APCO within 96 hours. [Kern County Rule 108 and District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
38. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the APCO of the intent to shut down the CEM at least 24 hours prior to the event. [Kern County Rule 108 and District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
39. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

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40. Unit shall be fired on a natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333 (a) & (b); 40 CFR 60.334 (c)(2); Kern County Rule 407; and District Rule 4801] Federally Enforceable Through Title V Permit
41. If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using method(s) specified on this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
43. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246, or double GC for H₂S and mercaptans. [40 CFR 60.335 (d)] Federally Enforceable Through Title V Permit
44. If the turbine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334 (b)(2)] Federally Enforceable Through Title V Permit
45. Operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(a)(2)] Federally Enforceable Through Title V Permit
46. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, OR ASTM 1945. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
47. The operator shall provide source test information annually regarding the exhaust gas NO_x concentration corrected to 15% O₂ (dry). [40 CFR 60.332 (a),(b) and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
48. Results of continuous emission monitoring must be averaged in accordance with the requirements of 40 CFR 60.13. [40 CFR 60.334 (a),(b),(c) and District Rule 4703, 5.0] Federally Enforceable Through Title V Permit
49. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit
50. This unit is a simple combustion turbine as defined in 40 CFR 72.6 (b)(1) and shall not be subject to the requirements of 40 CFR Part 72. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
51. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Kern County Rules 404, 108, and 108.1. A permit shield is granted from these requirements. [SJVUAPCD Rule 2520, 13.2] Federally Enforceable Through Title V Permit
52. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: Kern County Rule 407; District Rules 4801, 4201, 1081, and 1080, Sections 6.5, 7.2, 8.0, 9.0, and 10.0; 40 CFR 60.332 (c) and (d); 60.334 (b), (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
53. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: District Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
54. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: District Rules 1080, 7.3 and 4703, 6.2.2; 40 CFR 60.332(a), (b); 60.333(a) and (b), 60.334(a), (b), and (c)(1); 60.335(a), (b) and (c)(2). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

55. All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
56. The Permittee (MSCC) must notify EPA by telephone, facsimile, or electronic mail transmission within two (2) working days following the discovery of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner, which results in an increase in emissions above any allowable emission limit stated in any conditions where PSD is cited as the basis of the condition. In addition, the Permittee (MSCC) must notify EPA in writing within fifteen (15) days of any such failure. The notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in any conditions where PSD is cited as the basis of the condition, and the methods utilized to mitigate emissions and restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violation of this permit or of any law or regulation that such malfunction may cause, except as provided for in the conditions where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
57. A malfunction means a sudden and unavoidable breakdown of equipment or of a process beyond the reasonable control of the source. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
58. Emissions in excess of the limits specified in any conditions where PSD is cited as the basis of the condition shall constitute a violation of this permit and may be the subject of enforcement proceedings. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
59. Affirmative defense: In the context of an enforcement proceeding, emissions which are below the limits set forth in any condition where PSD is cited as the basis of the condition shall not be subject to penalty if the Permittee (MSCC) retains properly signed, contemporaneous operating logs or other relevant evidence and can demonstrate all of the following: i.) A malfunction caused the emissions in excess of the limits in any condition where PSD is cited as the basis of the condition; ii.) The permitted facility, including the air pollution control equipment and process equipment, was being properly operated at the time of the malfunction; iii.) Preventative maintenance was regularly performed in a manner consistent with good practice for minimizing emissions; iv.) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; v.) During the period of the malfunction, the permittee (MSCC) took all reasonable steps to minimize the amount and duration of emissions (including any bypass) that exceeded the emission limits provided in any condition where PSD is cited as the basis of the condition. Reasonable steps to minimize emissions could include, but are not limited to, reducing production to the lowest level practicable, reducing the material feed that results in the increased emissions, and switching to alternative, less polluting fuels. Where repairs were required, repairs were made in an expeditious fashion when the operator knew or should have known that applicable emission limitations were being exceeded. Off-shift labor and overtime must have been utilized, to the extent practicable, to ensure that such repairs were made as expeditiously as possible; and vi.) The permittee (MSCC) complied with the malfunction reporting requirements as specified in the condition where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
60. All emissions, including those associated with a malfunction which may be eligible for an affirmative defense, must be included in all emissions calculations and demonstrations of compliance with mass emission limits (e.g., daily, monthly, and annual emission limits) specified in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
61. This provision is in addition to any emergency or malfunction provision contained in any applicable requirement or elsewhere in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
62. The EPA Regional Administrator, and/or their authorized representative, upon the presentation of credential, must be permitted: (1) to enter the premises where the source is located or where any records are required to be kept under the terms and conditions of the PSD permit SJ-87-01; and (2) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of PSD permit SJ 87-01; and (3) to inspect any equipment, operation, or method required in the PSD permit SJ-87-01; and (4) to sample emissions from source(s). [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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63. In the event of any changes in control or ownership of facilities to be constructed or modified, this permit shall be binding on all subsequent owners and operators. The Permittee (MSCC) shall notify the succeeding owner and operator of the existence of the PSD permit SJ-87-01 and its conditions by letter, a copy of which shall be forwarded to the EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
64. The provisions of the PSD permit SJ-87-01 are severable, and , if any provisions of the permit is held invalid, the remainder of the permit must not be affected thereby. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
65. The permittee (MSCC) must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, 62, and 63 and all other applicable Federal, State, and local air quality regulations. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
66. On or before the date of startup (as defined in 40 C.F.R. 60.2) of the Western Midway Sunset Cogeneration Project (WMSCP; PSD Permit No. SJ-00-01) and thereafter the Permittee (MSCC) must install, continuously operate, and maintain the Dry Low NOx (DLN) combustion systems to reduce NOx emissions from each of its three turbines. The Permittee (MSCC) shall also use proper combustion techniques for the control of CO emissions from the equipment at MSCP. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
67. Within 60 days after achieving the base load, but no later than 180 days after initial startup of all three modified turbines (as defined in 40 C.F.R. 60.2), and annually thereafter (at about the anniversary of the initial performance test), the Permittee (MSCC) must conduct performance tests (as described in 40 C.F.R. 60.8) for NOx, and CO on the exhaust stack gases. The Permittee (MSCC) must furnish the District, the California Air Resources Board (CARB), and the EPA a written report of the results of such tests. Upon written request from the Permittee (MSCC), and adequate justification, EPA may waive a specific annual test and/or allow for testing to be done at less than maximum operating capacity. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
68. Performance tests for the emissions of NOx, and CO must be conducted and the results reported in accordance with the test methods set forth in 40 C.F.R. 60.8 and 40 C.F.R. 60, Appendix A. The following test methods must be used: a.) Performance tests for the emissions of NOx must be conducted using EPA Method 1-4 and 7E. b.) Performance tests for the emissions of CO must be conducted using the EPA Methods 1-4 and 10. In lieu of the above-mentioned test methods, equivalent methods may be used with prior written approval from EPA. The Permittee (MSCC) must notify EPA in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
69. For performance test purposes, sampling ports, platforms, and access must be provided by the Permittee on the emission unit exhaust system in accordance with 40 C.F.R. 60.8(e). [PSD SJ 87-01] Federally Enforceable Through Title V Permit
70. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of CO into the atmosphere in excess of the following emission limits per turbine: The more stringent of 25 ppmvd @ 15% O2 or 55 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
71. This condition applies prior to the startup of the WMSCP: On and after the date of start up any of the three turbines at MSCP must not discharge (per turbine, and based on 3-hour rolling average) into the atmosphere CO in excess of the following of any of: 1.) The more stringent of 52.0 ppmvd @ 15% O2 or 94 pounds for loads greater than or equal to 75%. 2.) The more stringent of 62.0 ppmvd @ 15% O2 or 94 pounds for loads greater than or equal to 35% but less than 75%. 3.) 94 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
72. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of NOx into the atmosphere in excess of the following emission limits per turbine: The more stringent of 10 ppmvd @ 15% O2 or 36.1 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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73. This condition applies prior to the startup of the WMSCP: On and after the date of start-up of any of the three turbines, MSCC must not discharge (per turbine, based on 3-hour rolling average) into the atmosphere NO_x (as NO₂) in excess of the following: 1.) The more stringent of 25.0 ppmvd @ 15% O₂ or 85.0 pounds per hour for loads greater than or equal to 75%; 2.) The more stringent of 42.0 ppmvd @ 15% O₂ or 85 pounds per hour for loads greater than or equal to 35% but less than 75%; 3.) 85 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
74. The hourly (3-hour averaging) emissions must not exceed: 1.) 94 pounds of CO and 85 pounds of NO_x; 2.) All CEMs must be operating during startups and shut downs; 3.) The time, date and duration of each startup and shutdown event must be recorded. The records must include the lbs/hour calculations based on the CEM data. These records must be kept for five years following the date of such events. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
75. Prior to the date of startup and thereafter, the Permittee (MSCC) must install, maintain and operate the following continuous monitoring systems (CEMs) in the exhaust stacks: a.) Continuous monitoring systems to measure stack gas NO_x, CO and O₂ concentrations. The systems must meet EPA monitoring performance specification (40 C.F.R. 60.13 and 40 C.F.R. 60, Appendix B, Performance Specifications 2, 3 and 4); b.) A continuous monitoring system to measure stack gas and natural gas volumetric flow rates. The stack gas flow measurement system must meet EPA Performance Specifications for (40 C.F.R. Part 52, Appendix E). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
76. The Permittee (MSCC) must maintain a file of all measurements, including continuous monitoring systems evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; performance and all other information required by 40 C.F.R. 60 Appendices A-B recorded in a permanent form suitable for inspection. The file must be retained for five years following the date of such measurements, maintenance, reports and records. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
77. The Permittee (MSCC) must notify EPA of the date on which demonstration for the continuous monitoring system performance commences (40 C.F.R. 60.13). This date must be no later than 60 days after full load operation but not later than 180 days after startup. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
78. The Permittee (MSCC) must submit a written report of all excess emissions to EPA for every calendar quarter. The quarterly report must include the following: a.) The magnitude of the excess emissions computed in accordance with 40 C.F.R. 60.13(h), any conversion factors used, and the date and time of commencement and compilation of each time period of excess emissions; b.) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of any equipment. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted must also be reported; c.) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments; d.) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information must be stated in the report; and e.) Excess emissions must be defined as any 3-hour period during which the average emissions of CO, as measured by the CEM exceeds the maximum emission limits set forth in the condition with a CO emission limit, where PSD is cited as the basis of the condition or any 3-hour period during which the average emissions of NO_x exceed the maximum emission limits set forth in the condition with a NO_x emission limit, where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
79. Excess emissions indicated by the CEM system must be considered violations of the applicable emission limit for the purpose of this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
80. The quality assurance project plan used by the Permittee (MSCC) for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 C.F.R. Part 60, Appendix F, must be available upon request to EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
81. The Permittee (MSCC) must keep a monthly record of all fuel uses. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
82. The proposed power plant is subject to the federal regulations entitled Standards of Performance for New Stationary Sources (40 C.F.R. 60). The owner or operator must meet all applicable requirements of 40 C.F.R. 60 Subparts A and GG of this regulation. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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83. All three turbines will fire natural gas only. The Permittee (MSCC) must only combust pipeline quality natural gas with sulfur content (as S) below 0.75 grains per 100 dry standard cubic feet (dscf). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
84. MSCC shall have legal and operational responsibility and control of all air pollutant emitting activities of the MSCP. This responsibility shall include, but shall not be limited to the following: 1.) Operating and maintaining the project to comply with all federal, state, and local air pollution laws, regulations, orders, and other requirements; 2.) Ensuring the emissions offsets, tradeoffs, or other emission reductions required for this project under permits issued by the U.S. EPA, the District, and/or the California Energy Commission are obtained as required; or 3.) Any violations of any air pollution requirements are the legal responsibility of MSCC, in addition to any other legal responsible entity. Any proposed change to this condition shall require prior written concurrence of the US EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
85. The allowable incidental taking (killing, harming, or harassment) of San Joaquin kit foxes, blunt-nosed leopard lizards, and giant kangaroo rats is confined to the proposed cogeneration plant site one half mile radius around this site (on lands owned or leased by Aera Energy LLC), and associated subject cogeneration plant facilities (including pipelines, transmission lines, temporary equipment stockpiling areas, and access roads) as discussed in the project Application for Certification report (Sun Cogeneration Company and Southern Sierra Energy Company 1985). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
86. MSCC is required to implement the "Agreement on Conditions for Mitigation of the Biological Impacts of the Midway-Sunset Project" as required by the U.S. Fish and Wildlife Service (USFWS) (Memorandum dated March 16, 1987 from the USFWS to the US EPA). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
87. Any endangered species found dead should be turned in to the California Department of Fish and Game for Analysis. MSCC must also report this event to the USFWS. The USFWS may recommend amendment to the existing project actions pending results of the analysis. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
88. All correspondence as required by this permit shall be forwarded to: 1.) Director, Air Division (Attn: Air-3) EPA Region IX 75 Hawthorne Street San Francisco, CA 94105-3901 Tel: (415) 744-1291 Fax: (415) 744-1076; 2.) Chief, Stationary Source Division, California Air Resource Board P.O. Box 2815 Sacramento, CA 95812; and 3.) Air Pollution Control Officer, San Joaquin Valley Unified APCD 34946 Flyover Court Bakersfield, CA 93308. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
89. MSCC is jointly owned by Sun Cogeneration Limited Partnership (Sun Cogen LP) and San Joaquin Energy Company. Sun Cogen LP is managed and controlled by a wholly owned subsidiary of Aera Energy LLC. (See Condition 104) [PSD SJ-87-01] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

PTO S-1135-225-29



San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-225-29

EXPIRATION DATE: 05/31/2026

SECTION: 17 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

78.2 MW COGENERATION UNIT B WITH GE MODEL G7111E FRAME 7E GAS TURBINE ENGINE WITH DRY LOW NOX COMBUSTORS (DLN1+ TURNDOWN ENHANCE), SELECTIVE CATALYTIC REDUCTION (SCR), AND UNFIRED HEAT RECOVERY STEAM GENERATOR (HRSG)

PERMIT UNIT REQUIREMENTS

1. CTG exhaust after the SCR unit shall be equipped with continuously recording emissions monitors dedicated to this unit for NO_x, CO, and O₂. Continuous emissions monitors shall meet the requirements of 40 CFR Part 60, Appendices B and F, and 40 CFR Part 75, and shall be capable of monitoring emissions during startups and shutdowns as well as normal operating conditions. If relative accuracy of CEM(s) cannot be demonstrated during startup conditions, CEM results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
2. CTG shall be equipped with a continuously recording emission monitor preceding the SCR module measuring NO_x concentration for the purposes of calculating ammonia slip. Permittee shall check, record, and quantify the calibration drift (CD) at two concentration values at least once daily (approximately 24 hours) when SCR is operated. The calibration shall be adjusted whenever the daily zero or high-level CD exceeds 5%. If either the zero or high-level CD exceeds 5% for five consecutive daily periods, the analyzer shall be deemed out-of-control. If either the zero or high-level CD exceeds 10% during any CD check, analyzer shall be deemed out-of-control. If the analyzer is out-of-control, the permittee shall take appropriate corrective action and then repeat the CD check. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
3. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Heat recovery steam generator design shall provide space for additional selective catalytic reduction catalyst and oxidation catalyst if required to meet NO_x and CO emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
5. When SCR is operated, permittee shall monitor and record exhaust gas temperature at selective catalytic reduction and oxidation catalyst inlets. [District Rule 2201] Federally Enforceable Through Title V Permit
6. When SCR is operated, ammonia shall be injected whenever the selective catalytic reduction system catalyst temperature exceeds the minimum ammonia injection temperature recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas turbine engine shall be equipped with fuel consumption monitor recorder accurate to +/- 3%. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CEM for NO_x (as NO₂) and CO shall conform to Rule 1080 specifications. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
9. HRSG exhaust stack shall be equipped with permanent stack sampling provisions adequate to facilitate testing consistent with EPA test methods. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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10. Flue gas ducting from engine to HRSG shall have no provisions for introduction of dilution air. [District Rule 1110] Federally Enforceable Through Title V Permit
11. Lube oil cooler/accumulation vent shall be equipped with control device(s) approved by the APCO sufficient to prevent emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Lube oil cooler/accumulator vent(s) shall not have detectable emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Natural gas sulfur content shall not exceed 0.31 gr/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. All CEM's shall be calibrated and operated according to EPA guidelines as specified in 40 CFR 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
15. Quarterly CEM reports shall be submitted to the APCO according to EPA regulations as specified in 40 CFR 60 Appendix B. [District Rule 4001 and District rule 1080, 8.0] Federally Enforceable Through Title V Permit
16. Audits of all monitors shall be conducted by independent laboratory in accordance with EPA guidelines and witnessed by District. Reports shall be submitted to District within 60 days of audits. [District Rule 1080] Federally Enforceable Through Title V Permit
17. All notification, recordkeeping, performance tests, reporting requirements, and compliance testing requirements of Rule 4001 NSPS shall be satisfied. [District Rule 4001] Federally Enforceable Through Title V Permit
18. Operational records including fuel type, fuel characteristics, and consumption shall be maintained and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
19. Accurate records of NO_x (as NO₂) and CO flue gas concentration corrected to 15% O₂ and fuel gas sulfur content shall be maintained and shall be reported as described in Rule 1080 upon request. [District Rule 1080] Federally Enforceable Through Title V Permit
20. Emission rates shall not exceed the following: PM₁₀: 0.010 lb/MMBtu, SO_x (as SO₂): 0.001 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu, VOC: 0.009 lb/MMBtu, CO: 0.057 lb/MMBtu, and ammonia - 10 ppmvd @ 15%O₂. [District Rules 2201, 4201; and Kern County Rule 404] Federally Enforceable Through Title V Permit
21. Permittee shall comply with the following emission limit at all times except during periods of start-up, shutdown, or reduced load: NO_x (as NO₂): 5.0 ppmv, and CO: 25 ppmv, dry @ 15% O₂ corrected to ISO conditions. [40 CFR 60.332(a)(1) & 60.332(a)(2) and District Rule 4703] Federally Enforceable Through Title V Permit
22. Gas turbine engine start-up is that period of time not exceeding two hours in duration during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
23. Gas turbine engine shutdown is that period of time not exceeding two hours in duration during which the unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
24. Gas turbine reduced load period is that period not exceeding one hour in duration during which the unit is operated at less than rated capacity in order to change the position of the exhaust gas diverter gate. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
25. Compliance with NO_x and CO emission limits shall be demonstrated by District-witnessed sample collection by independent testing laboratory on an annual basis. Compliance with NO_x, CO and ammonia emissions limits shall be demonstrated by District-witnessed sample collection by independent testing laboratory within 60 days of any use of the SCR system, unless compliance with emissions limitations has been demonstrated with the SCR system in operation within the preceding 12 month period. [District Rule 4703 and 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. The following test methods shall be used PM10: EPA method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA method 10 (or 10B) or CARB Method 100, O2: EPA Method 3, 3A, or 20, VOC: EPA method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081, 40 CFR 60.335 (b), and District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
28. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 = $((a - (b \times c / 1,000,000)) \times 1,000,000 / b) \times d$, where a = ammonia injection rate (lb/hr) / 17 (lb/lb. mol), b = dry exhaust gas flow rate (lb/hr) / (29 (lb/lb. mol)), c = change in measured NOx concentration ppmv at 15% O2 across catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip. [District Rule 4102] Federally Enforceable Through Title V Permit
29. Official test results and field data shall be submitted within 60 days after collection. [District Rule 4703 and District Rule 1081] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4703] Federally Enforceable Through Title V Permit
31. CEC emission rates, except during periods of startup, shutdown, or reduced load shall not exceed PM10: 9.98 lb/hr, SOx (as SO2): 0.92 lb/hr, NOx (as NO2): 17.66 lb/hr, VOC: 9.00 lb/hr, and CO: 54.91 lb/hr. [District Rules 2080 and 4703, and 40 CFR 60] Federally Enforceable Through Title V Permit
32. For CEC purposes, emissions during periods of startup and shutdown shall not exceed the following values average over 2 hours: NOx: 140 lb/hr, and CO: 94 lb/hr. [District Rule 2080] Federally Enforceable Through Title V Permit
33. The CEC shall be notified of any changes to the combined annual emission limits for cogeneration units S-1135-224, -225, and -226, only to the extent to be informed of their impact on the Midway-Sunset Cogeneration Facility. [District Rule 2080] Federally Enforceable Through Title V Permit
34. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [Kern County Rule 108 and District Rule 1080] Federally Enforceable Through Title V Permit
35. Records shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEM's that have been installed pursuant to District Rule 1080, and emission measurements. [Kern County Rule 108; District Rules 1080 and 4703; 40 CFR 60.7 (b)] Federally Enforceable Through Title V Permit
36. The permittee shall maintain hourly average records of NOx and CO emissions. Compliance with the hourly, daily, and twelve month rolling average VOC emission limits shall be demonstrated by the CO CEM data and the VOC/CO relationship determined by annual CO and VOC source tests of NOx, CO, and ammonia emission concentrations (ppmv @ 15% O2), and hourly, daily, and twelve month rolling. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. A violation of NOx emission standards indicated by the NOx CEM shall be reported by the operator to the APCO within 96 hours. [Kern County Rule 108 and District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
38. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the APCO of the intent to shut down the CEM at least 24 hours prior to the event. [Kern County Rule 108 and District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
39. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

40. Unit shall be fired on a natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333 (a) & (b); 40 CFR 60.334 (c)(2); Kern County Rule 407; and District Rule 4801] Federally Enforceable Through Title V Permit
41. If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using method(s) specified on this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
43. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246, or double GC for H₂S and mercaptans. [40 CFR 60.335 (d)] Federally Enforceable Through Title V Permit
44. If the turbine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334 (b)(2)] Federally Enforceable Through Title V Permit
45. Operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(a)(2)] Federally Enforceable Through Title V Permit
46. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, OR ASTM 1945. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
47. The operator shall provide source test information annually regarding the exhaust gas NO_x concentration corrected to 15% O₂ (dry). [40 CFR 60.332 (a),(b) and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
48. Results of continuous emission monitoring must be averaged in accordance with the requirements of 40 CFR 60.13. [40 CFR 60.334 (a),(b),(c) and District Rule 4703, 5.0] Federally Enforceable Through Title V Permit
49. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit
50. This unit is a simple combustion turbine as defined in 40 CFR 72.6 (b)(1) and shall not be subject to the requirements of 40 CFR Part 72. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
51. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Kern County Rules 404, 108, and 108.1. A permit shield is granted from these requirements. [SJVUAPCD Rule 2520, 13.2] Federally Enforceable Through Title V Permit
52. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: Kern County Rule 407; District Rules 4801, 4201, 1081, and 1080, Sections 6.5, 7.2, 8.0, 9.0, and 10.0; 40 CFR 60.332 (c) and (d); 60.334 (b), (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
53. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: District Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
54. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: District Rules 1080, 7.3 and 4703, 6.2.2; 40 CFR 60.332(a), (b); 60.333(a) and (b), 60.334(a), (b), and (c)(1); 60.335(a), (b) and (c)(2). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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55. All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
56. The Permittee (MSCC) must notify EPA by telephone, facsimile, or electronic mail transmission within two (2) working days following the discovery of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner, which results in an increase in emissions above any allowable emission limit stated in any conditions where PSD is cited as the basis of the condition. In addition, the Permittee (MSCC) must notify EPA in writing within fifteen (15) days of any such failure. The notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in any conditions where PSD is cited as the basis of the condition, and the methods utilized to mitigate emissions and restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violation of this permit or of any law or regulation that such malfunction may cause, except as provided for in the conditions where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
57. A malfunction means a sudden and unavoidable breakdown of equipment or of a process beyond the reasonable control of the source. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
58. Emissions in excess of the limits specified in any conditions where PSD is cited as the basis of the condition shall constitute a violation of this permit and may be the subject of enforcement proceedings. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
59. Affirmative defense: In the context of an enforcement proceeding, emissions which are below the limits set forth in any condition where PSD is cited as the basis of the condition shall not be subject to penalty if the Permittee (MSCC) retains properly signed, contemporaneous operating logs or other relevant evidence and can demonstrate all of the following: i.) A malfunction caused the emissions in excess of the limits in any condition where PSD is cited as the basis of the condition; ii.) The permitted facility, including the air pollution control equipment and process equipment, was being properly operated at the time of the malfunction; iii.) Preventative maintenance was regularly performed in a manner consistent with good practice for minimizing emissions; iv.) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; v.) During the period of the malfunction, the permittee (MSCC) took all reasonable steps to minimize the amount and duration of emissions (including any bypass) that exceeded the emission limits provided in any condition where PSD is cited as the basis of the condition. Reasonable steps to minimize emissions could include, but are not limited to, reducing production to the lowest level practicable, reducing the material feed that results in the increased emissions, and switching to alternative, less polluting fuels. Where repairs were required, repairs were made in an expeditious fashion when the operator knew or should have known that applicable emission limitations were being exceeded. Off-shift labor and overtime must have been utilized, to the extent practicable, to ensure that such repairs were made as expeditiously as possible; and vi.) The permittee (MSCC) complied with the malfunction reporting requirements as specified in the condition where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
60. All emissions, including those associated with a malfunction which may be eligible for an affirmative defense, must be included in all emissions calculations and demonstrations of compliance with mass emission limits (e.g., daily, monthly, and annual emission limits) specified in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
61. This provision is in addition to any emergency or malfunction provision contained in any applicable requirement or elsewhere in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
62. The EPA Regional Administrator, and/or their authorized representative, upon the presentation of credential, must be permitted: (1) to enter the premises where the source is located or where any records are required to be kept under the terms and conditions of the PSD permit SJ-87-01; and (2) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of PSD permit SJ 87-01; and (3) to inspect any equipment, operation, or method required in the PSD permit SJ-87-01; and (4) to sample emissions from source(s). [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

63. In the event of any changes in control or ownership of facilities to be constructed or modified, this permit shall be binding on all subsequent owners and operators. The Permittee (MSCC) shall notify the succeeding owner and operator of the existence of the PSD permit SJ-87-01 and its conditions by letter, a copy of which shall be forwarded to the EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
64. The provisions of the PSD permit SJ-87-01 are severable, and , if any provisions of the permit is held invalid, the remainder of the permit must not be affected thereby. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
65. The permittee (MSCC) must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, 62, and 63 and all other applicable Federal, State, and local air quality regulations. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
66. On or before the date of startup (as defined in 40 C.F.R. 60.2) of the Western Midway Sunset Cogeneration Project (WMSCP; PSD Permit No. SJ-00-01) and thereafter the Permittee (MSCC) must install, continuously operate, and maintain the Dry Low NOx (DLN) combustion systems to reduce NOx emissions from each of its three turbines. The Permittee (MSCC) shall also use proper combustion techniques for the control of CO emissions from the equipment at MSCP. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
67. Within 60 days after achieving the base load, but no later than 180 days after initial startup of all three modified turbines (as defined in 40 C.F.R. 60.2), and annually thereafter (at about the anniversary of the initial performance test), the Permittee (MSCC) must conduct performance tests (as described in 40 C.F.R. 60.8) for NOx, and CO on the exhaust stack gases. The Permittee (MSCC) must furnish the District, the California Air Resources Board (CARB), and the EPA a written report of the results of such tests. Upon written request from the Permittee (MSCC), and adequate justification, EPA may waive a specific annual test and/or allow for testing to be done at less than maximum operating capacity. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
68. Performance tests for the emissions of NOx, and CO must be conducted and the results reported in accordance with the test methods set forth in 40 C.F.R. 60.8 and 40 C.F.R. 60, Appendix A. The following test methods must be used: a.) Performance tests for the emissions of NOx must be conducted using EPA Method 1-4 and 7E. b.) Performance tests for the emissions of CO must be conducted using the EPA Methods 1-4 and 10. In lieu of the above-mentioned test methods, equivalent methods may be used with prior written approval from EPA. The Permittee (MSCC) must notify EPA in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
69. For performance test purposes, sampling ports, platforms, and access must be provided by the Permittee on the emission unit exhaust system in accordance with 40 C.F.R. 60.8(e). [PSD SJ 87-01] Federally Enforceable Through Title V Permit
70. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of CO into the atmosphere in excess of the following emission limits per turbine: The more stringent of 25 ppmvd @ 15% O2 or 55 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
71. This condition applies prior to the startup of the WMSCP: On and after the date of start up any of the three turbines at MSCP must not discharge (per turbine, and based on 3-hour rolling average) into the atmosphere CO in excess of the following of any of: 1.) The more stringent of 52.0 ppmvd @ 15% O2 or 94 pounds for loads greater than or equal to 75%. 2.) The more stringent of 62.0 ppmvd @ 15% O2 or 94 pounds for loads greater than or equal to 35% but less than 75%. 3.) 94 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
72. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of NOx into the atmosphere in excess of the following emission limits per turbine: The more stringent of 10 ppmvd @ 15% O2 or 36.1 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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73. This condition applies prior to the startup of the WMSCP: On and after the date of start-up of any of the three turbines, MSCC must not discharge (per turbine, based on 3-hour rolling average) into the atmosphere NO_x (as NO₂) in excess of the following: 1.) The more stringent of 25.0 ppmvd @ 15% O₂ or 85.0 pounds per hour for loads greater than or equal to 75%; 2.) The more stringent of 42.0 ppmvd @ 15% O₂ or 85 pounds per hour for loads greater than or equal to 35% but less than 75%; 3.) 85 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
74. The hourly (3-hour averaging) emissions must not exceed: 1.) 94 pounds of CO and 85 pounds of NO_x; 2.) All CEMs must be operating during startups and shut downs; 3.) The time, date and duration of each startup and shutdown event must be recorded. The records must include the lbs/hour calculations based on the CEM data. These records must be kept for five years following the date of such events. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
75. Prior to the date of startup and thereafter, the Permittee (MSCC) must install, maintain and operate the following continuous monitoring systems (CEMs) in the exhaust stacks: a.) Continuous monitoring systems to measure stack gas NO_x, CO and O₂ concentrations. The systems must meet EPA monitoring performance specification (40 C.F.R. 60.13 and 40 C.F.R. 60, Appendix B, Performance Specifications 2, 3 and 4); b.) A continuous monitoring system to measure stack gas and natural gas volumetric flow rates. The stack gas flow measurement system must meet EPA Performance Specifications for (40 C.F.R. Part 52, Appendix E). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
76. The Permittee (MSCC) must maintain a file of all measurements, including continuous monitoring systems evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; performance and all other information required by 40 C.F.R. 60 Appendices A-B recorded in a permanent form suitable for inspection. The file must be retained for five years following the date of such measurements, maintenance, reports and records. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
77. The Permittee (MSCC) must notify EPA of the date on which demonstration for the continuous monitoring system performance commences (40 C.F.R. 60.13). This date must be no later than 60 days after full load operation but not later than 180 days after startup. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
78. The Permittee (MSCC) must submit a written report of all excess emissions to EPA for every calendar quarter. The quarterly report must include the following: a.) The magnitude of the excess emissions computed in accordance with 40 C.F.R. 60.13(h), any conversion factors used, and the date and time of commencement and compilation of each time period of excess emissions; b.) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of any equipment. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted must also be reported; c.) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments; d.) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information must be stated in the report; and e.) Excess emissions must be defined as any 3-hour period during which the average emissions of CO, as measured by the CEM exceeds the maximum emission limits set forth in the condition with a CO emission limit, where PSD is cited as the basis of the condition or any 3-hour period during which the average emissions of NO_x exceed the maximum emission limits set forth in the condition with a NO_x emission limit, where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
79. Excess emissions indicated by the CEM system must be considered violations of the applicable emission limit for the purpose of this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
80. The quality assurance project plan used by the Permittee (MSCC) for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 C.F.R. Part 60, Appendix F, must be available upon request to EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
81. The Permittee (MSCC) must keep a monthly record of all fuel uses. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
82. The proposed power plant is subject to the federal regulations entitled Standards of Performance for New Stationary Sources (40 C.F.R. 60). The owner or operator must meet all applicable requirements of 40 C.F.R. 60 Subparts A and GG of this regulation. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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83. All three turbines will fire natural gas only. The Permittee (MSCC) must only combust pipeline quality natural gas with sulfur content (as S) below 0.75 grains per 100 dry standard cubic feet (dscf). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
84. MSCC shall have legal and operational responsibility and control of all air pollutant emitting activities of the MSCP. This responsibility shall include, but shall not be limited to the following: 1.) Operating and maintaining the project to comply with all federal, state, and local air pollution laws, regulations, orders, and other requirements; 2.) Ensuring the emissions offsets, tradeoffs, or other emission reductions required for this project under permits issued by the U.S. EPA, the District, and/or the California Energy Commission are obtained as required; or 3.) Any violations of any air pollution requirements are the legal responsibility of MSCC, in addition to any other legal responsible entity. Any proposed change to this condition shall require prior written concurrence of the US EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
85. The allowable incidental taking (killing, harming, or harassment) of San Joaquin kit foxes, blunt-nosed leopard lizards, and giant kangaroo rats is confined to the proposed cogeneration plant site one half mile radius around this site (on lands owned or leased by Aera Energy LLC), and associated subject cogeneration plant facilities (including pipelines, transmission lines, temporary equipment stockpiling areas, and access roads) as discussed in the project Application for Certification report (Sun Cogeneration Company and Southern Sierra Energy Company 1985). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
86. MSCC is required to implement the "Agreement on Conditions for Mitigation of the Biological Impacts of the Midway-Sunset Project" as required by the U.S. Fish and Wildlife Service (USFWS) (Memorandum dated March 16, 1987 from the USFWS to the US EPA). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
87. Any endangered species found dead should be turned in to the California Department of Fish and Game for Analysis. MSCC must also report this event to the USFWS. The USFWS may recommend amendment to the existing project actions pending results of the analysis. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
88. All correspondence as required by this permit shall be forwarded to: 1.) Director, Air Division (Attn: Air-3) EPA Region IX 75 Hawthorne Street San Francisco, CA 94105-3901 Tel: (415) 744-1291 Fax: (415) 744-1076; 2.) Chief, Stationary Source Division, California Air Resource Board P.O. Box 2815 Sacramento, CA 95812; and 3.) Air Pollution Control Officer, San Joaquin Valley Unified APCD 34946 Flyover Court Bakersfield, CA 93308. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
89. MSCC is jointly owned by Sun Cogeneration Limited Partnership (Sun Cogen LP) and San Joaquin Energy Company. Sun Cogen LP is managed and controlled by a wholly owned subsidiary of Aera Energy LLC. (See Condition 104) [PSD SJ-87-01] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

PTO S-1135-226-28

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: S-1135-226-28

EXPIRATION DATE: 05/31/2026

SECTION: 17 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

78.2 MW COGENERATION UNIT C WITH GE MODEL G7111E FRAME 7E GAS TURBINE ENGINE WITH DRY LOW NOX COMBUSTORS (DLN1+ TURNDOWN ENHANCE), SELECTIVE CATALYTIC REDUCTION (SCR), AND UNFIRED HEAT RECOVERY STEAM GENERATOR (HRSG)

PERMIT UNIT REQUIREMENTS

1. CTG exhaust after the SCR unit shall be equipped with continuously recording emissions monitors dedicated to this unit for NOx, CO, and O2. Continuous emissions monitors shall meet the requirements of 40 CFR Part 60, Appendices B and F, and 40 CFR Part 75, and shall be capable of monitoring emissions during startups and shutdowns as well as normal operating conditions. If relative accuracy of CEM(s) cannot be demonstrated during startup conditions, CEM results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
2. CTG shall be equipped with a continuously recording emission monitor preceding the SCR module measuring NOx concentration for the purposes of calculating ammonia slip. Permittee shall check, record, and quantify the calibration drift (CD) at two concentration values at least once daily (approximately 24 hours). The calibration shall be adjusted whenever the daily zero or high-level CD exceeds 5%. If either the zero or high-level CD exceeds 5% for five consecutive daily periods, the analyzer shall be deemed out-of-control. If either the zero or high-level CD exceeds 10% during any CD check, analyzer shall be deemed out-of-control. If the analyzer is out-of-control, the permittee shall take appropriate corrective action and then repeat the CD check. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
3. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Heat recovery steam generator design shall provide space for additional selective catalytic reduction catalyst and oxidation catalyst if required to meet NOx and CO emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
5. When SCR is operated, permittee shall monitor and record exhaust gas temperature at selective catalytic reduction and oxidation catalyst inlets. [District Rule 2201] Federally Enforceable Through Title V Permit
6. When SCR is operate, ammonia shall be injected whenever the selective catalytic reduction system catalyst temperature exceeds the minimum ammonia injection temperature recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas turbine engine shall be equipped with fuel consumption monitor recorder accurate to +/- 3%. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CEM for NOx (as NO2) and CO shall conform to Rule 1080 specifications. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
9. HRSG exhaust stack shall be equipped with permanent stack sampling provisions adequate to facilitate testing consistent with EPA test methods. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA
S-1135-226-28 : Feb 27 2025 10:24AM - LAFOREC

10. Flue gas ducting from engine to HRSG shall have no provisions for introduction of dilution air. [District Rule 1110] Federally Enforceable Through Title V Permit
11. Lube oil cooler/accumulation vent shall be equipped with control device(s) approved by the APCO sufficient to prevent emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Lube oil cooler/accumulator vent(s) shall not have detectable emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Natural gas sulfur content shall not exceed 0.31 gr/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. All CEM's shall be calibrated and operated according to EPA guidelines as specified in 40 CFR 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
15. Quarterly CEM reports shall be submitted to the APCO according to EPA regulations as specified in 40 CFR 60 Appendix B. [District Rule 4001 and District rule 1080, 8.0] Federally Enforceable Through Title V Permit
16. Audits of all monitors shall be conducted by independent laboratory in accordance with EPA guidelines and witnessed by District. Reports shall be submitted to District within 60 days of audits. [District Rule 1080] Federally Enforceable Through Title V Permit
17. All notification, recordkeeping, performance tests, reporting requirements, and compliance testing requirements of Rule 4001 NSPS shall be satisfied. [District Rule 4001] Federally Enforceable Through Title V Permit
18. Operational records including fuel type, fuel characteristics, and consumption shall be maintained and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
19. Accurate records of NO_x (as NO₂) and CO flue gas concentration corrected to 15% O₂ and fuel gas sulfur content shall be maintained and shall be reported as described in Rule 1080 upon request. [District Rule 1080] Federally Enforceable Through Title V Permit
20. Emission rates shall not exceed the following: PM₁₀: 0.010 lb/MMBtu, SO_x (as SO₂): 0.001 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu, VOC: 0.009 lb/MMBtu, CO: 0.057 lb/MMBtu, and ammonia - 10 ppmvd @ 15%O₂. [District NSR Rule; District Rule 4201; and Kern County Rule 404] Federally Enforceable Through Title V Permit
21. Permittee shall comply with the following emission limit at all times except during periods of start-up, shutdown, or reduced load as defined in Rule 4703: NO_x (as NO₂): 5.0 ppmv, and CO: 25 ppmv, dry @ 15% O₂ corrected to ISO conditions. [40 CFR 60.332(a)(1) & 60.332(a)(2) and District Rule 4703] Federally Enforceable Through Title V Permit
22. Gas turbine engine start-up is that period of time not exceeding two hours in duration during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
23. Gas turbine engine shutdown is that period of time not exceeding two hours in duration during which the unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
24. Gas turbine reduced load period is that period not exceeding one hour in duration during which the unit is operated at less than rated capacity in order to change the position of the exhaust gas diverter gate. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
25. Compliance with NO_x, CO and ammonia emission limits shall be demonstrated by District-witnessed sample collection by independent testing laboratory annually. [District Rules 4703 and 1081] Federally Enforceable Through Title V Permit
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

27. The following test methods shall be used PM10: EPA method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA method 10 (or 10B) or CARB Method 100, O2: EPA Method 3, 3A, or 20, VOC: EPA method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081, 40 CFR 60.335 (b), and District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
28. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 = $((a-(bxc/1,000,000)) \times 1,000,000 / b) \times d$, where a = ammonia injection rate(lb/hr)/17(lb/lb. mol), b = dry exhaust gas flow rate (lb/hr)/(29(lb/lb. mol), c = change in measured NOx concentration ppmv at 15% O2 across catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip. [District Rule 4102] Federally Enforceable Through Title V Permit
29. Official test results and field data shall be submitted within 60 days after collection. [District Rule 4703 and District Rule 1081] Federally Enforceable Through Title V Permit
30. Combined annual emissions from units S-1135-115, S-1135-119, S-1135-122, S-1135-123, S-1135-224, S-1135-225, S-1135-226 shall not exceed any of the following: PM10 - 262,360 lb/yr, SOx (as SO2) - 24,200 lb/yr, NOx (as NO2) - 464,170 lb/yr, VOC - 236,520 lb/yr, or CO - 1,443,101 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records of fuel type, quantity, heating value of gas burned, permitted emission factors and annual emissions for each unit. For units equipped with continuous emissions monitors (CEMs), CEM data may be used in place of calculated emissions. If CEM shows a violation, CEM data shall be used. Records shall be updated at least monthly. Reports of annual emissions and fuel usage shall be submitted within 30 days after the end of the calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
32. If fuel use monitoring provisions fail, emissions shall be calculated based on operational data, or if not available, on set equal to the average of four days prior to failure. [District NSR Rule] Federally Enforceable Through Title V Permit
33. When three gas turbine engines S-1135-224, '-225, and '-226 are operating, four steam generators S-1135-115, '-119, '-122, and '-123 shall be shut down. [District NSR Rule] Federally Enforceable Through Title V Permit
34. When up to two gas turbine engines S-1135-224, '-225, or '-226 are operating, four steam generators S-1135-115, '-119, '-122, and '-123 may be operated. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of operational status of units S-1135-115, S-1135-119, S-1135-122, S-1135-123, S-1135-224, S-1135-225, and S-1135-226 on a daily basis. [District Rule 2201] Federally Enforceable Through Title V Permit
36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4703] Federally Enforceable Through Title V Permit
37. CEC emission rates, except during periods of startup, shutdown, or reduced load shall not exceed PM10: 9.98 lb/hr, SOx (as SO2): 0.92 lb/hr, NOx (as NO2): 17.66 lb/hr, VOC: 9.00 lb/hr, and CO: 54.91 lb/hr. [District Rules 2080 and 4703, and 40 CFR 60] Federally Enforceable Through Title V Permit
38. For CEC purposes, emissions during periods of startup and shutdown shall not exceed the following values average over 2 hours: NOx: 140 lb/hr, and CO: 94 lb/hr. [District Rule 2080] Federally Enforceable Through Title V Permit
39. The CEC shall be notified of any changes to the combined annual emission limits for cogeneration units S-1135-224, -225, and -226, only to the extent to be informed of their impact on the Midway-Sunset Cogeneration Facility. [District Rule 2080] Federally Enforceable Through Title V Permit
40. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [Kern County Rule 108 and District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

41. Records shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEM's that have been installed pursuant to District Rule 1080, and emission measurements. [Kern County Rule 108; District Rules 1080 and 4703; 40 CFR 60.7 (b)] Federally Enforceable Through Title V Permit
42. The permittee shall maintain hourly average records of NOx and CO emissions. Compliance with the hourly, daily, and twelve month rolling average VOC emission limits shall be demonstrated by the CO CEM data and the VOC/CO relationship determined by annual CO and VOC source tests of NOx, CO, and ammonia emission concentrations (ppmv @ 15% O2), and hourly, daily, and twelve month rolling. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
43. A violation of NOx emission standards indicated by the NOx CEM shall be reported by the operator to the APCO within 96 hours. [Kern County Rule 108 and District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
44. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the APCO of the intent to shut down the CEM at least 24 hours prior to the event. [Kern County Rule 108 and District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
45. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit
46. Unit shall be fired on a natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333 (a) & (b); 40 CFR 60.334 (c)(2); Kern County Rule 407; and District Rule 4801] Federally Enforceable Through Title V Permit
47. If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
48. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using method(s) specified on this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
49. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246, or double GC for H2S and mercaptans. [40 CFR 60.335 (d)] Federally Enforceable Through Title V Permit
50. If the turbine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334 (b)(2)] Federally Enforceable Through Title V Permit
51. Operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(a)(2)] Federally Enforceable Through Title V Permit
52. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, OR ASTM 1945. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
53. The operator shall provide source test information annually regarding the exhaust gas NOx concentration corrected to 15% O2 (dry). [40 CFR 60.332 (a),(b) and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
54. Results of continuous emission monitoring must be averaged in accordance with the requirements of 40 CFR 60.13. [40 CFR 60.334 (a),(b),(c) and District Rule 4703, 5.0] Federally Enforceable Through Title V Permit
55. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

56. This unit is a simple combustion turbine as defined in 40 CFR 72.6 (b)(1) and shall not be subject to the requirements of 40 CFR Part 72. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
57. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Kern County Rules 404, 108, and 108.1. A permit shield is granted from these requirements. [SJVUAPCD Rule 2520, 13.2] Federally Enforceable Through Title V Permit
58. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: Kern County Rule 407; District Rules 4801, 4201, 1081, and 1080, Sections 6.5, 7.2, 8.0, 9.0, and 10.0; 40 CFR 60.332 (c) and (d); 60.334 (b), (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
59. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: District Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
60. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: District Rules 1080, 7.3 and 4703, 6.2.2; 40 CFR 60.332(a), (b); 60.333(a) and (b), 60.334(a), (b), and (c)(1); 60.335(a), (b) and (c)(2). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
61. All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
62. The Permittee (MSCC) must notify EPA by telephone, facsimile, or electronic mail transmission within two (2) working days following the discovery of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner, which results in an increase in emissions above any allowable emission limit stated in any conditions where PSD is cited as the basis of the condition. In addition, the Permittee (MSCC) must notify EPA in writing within fifteen (15) days of any such failure. The notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in any conditions where PSD is cited as the basis of the condition, and the methods utilized to mitigate emissions and restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violation of this permit or of any law or regulation that such malfunction may cause, except as provided for in the conditions where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
63. A malfunction means a sudden and unavoidable breakdown of equipment or of a process beyond the reasonable control of the source. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
64. Emissions in excess of the limits specified in any conditions where PSD is cited as the basis of the condition shall constitute a violation of this permit and may be the subject of enforcement proceedings. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

65. Affirmative defense: In the context of an enforcement proceeding, emissions which are below the limits set forth in any condition where PSD is cited as the basis of the condition shall not be subject to penalty if the Permittee (MSCC) retains properly signed, contemporaneous operating logs or other relevant evidence and can demonstrate all of the following: i.) A malfunction caused the emissions in excess of the limits in any condition where PSD is cited as the basis of the condition; ii.) The permitted facility, including the air pollution control equipment and process equipment, was being properly operated at the time of the malfunction; iii.) Preventative maintenance was regularly performed in a manner consistent with good practice for minimizing emissions; iv.) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; v.) During the period of the malfunction, the permittee (MSCC) took all reasonable steps to minimize the amount and duration of emissions (including any bypass) that exceeded the emission limits provided in any condition where PSD is cited as the basis of the condition. Reasonable steps to minimize emissions could include, but are not limited to, reducing production to the lowest level practicable, reducing the material feed that results in the increased emissions, and switching to alternative, less polluting fuels. Where repairs were required, repairs were made in an expeditious fashion when the operator knew or should have known that applicable emission limitations were being exceeded. Off-shift labor and overtime must have been utilized, to the extent practicable, to ensure that such repairs were made as expeditiously as possible; and vi.) The permittee (MSCC) complied with the malfunction reporting requirements as specified in the condition where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
66. All emissions, including those associated with a malfunction which may be eligible for an affirmative defense, must be included in all emissions calculations and demonstrations of compliance with mass emission limits (e.g., daily, monthly, and annual emission limits) specified in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
67. This provision is in addition to any emergency or malfunction provision contained in any applicable requirement or elsewhere in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
68. The EPA Regional Administrator, and/or their authorized representative, upon the presentation of credential, must be permitted: (1) to enter the premises where the source is located or where any records are required to be kept under the terms and conditions of the PSD permit SJ-87-01; and (2) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of PSD permit SJ 87-01; and (3) to inspect any equipment, operation, or method required in the PSD permit SJ-87-01; and (4) to sample emissions from source(s). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
69. In the event of any changes in control or ownership of facilities to be constructed or modified, this permit shall be binding on all subsequent owners and operators. The Permittee (MSCC) shall notify the succeeding owner and operator of the existence of the PSD permit SJ-87-01 and its conditions by letter, a copy of which shall be forwarded to the EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
70. The provisions of the PSD permit SJ-87-01 are severable, and , if any provisions of the permit is held invalid, the remainder of the permit must not be affected thereby. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
71. The permittee (MSCC) must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, 62, and 63 and all other applicable Federal, State, and local air quality regulations. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
72. On or before the date of startup (as defined in 40 C.F.R. 60.2) of the Western Midway Sunset Cogeneration Project (WMSCP; PSD Permit No. SJ-00-01) and thereafter the Permittee (MSCC) must install, continuously operate, and maintain the Dry Low NOx (DLN) combustion systems to reduce NOx emissions from each of its three turbines. The Permittee (MSCC) shall also use proper combustion techniques for the control of CO emissions from the equipment at MSCP. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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73. Within 60 days after achieving the base load, but no later than 180 days after initial startup of all three modified turbines (as defined in 40 C.F.R. 60.2), and annually thereafter (at about the anniversary of the initial performance test), the Permittee (MSCC) must conduct performance tests (as described in 40 C.F.R. 60.8) for NO_x and CO on the exhaust stack gases. The Permittee (MSCC) must furnish the District, the California Air Resources Board (CARB), and the EPA a written report of the results of such tests. Upon written request from the Permittee (MSCC), and adequate justification, EPA may waive a specific annual test and/or allow for testing to be done at less than maximum operating capacity. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
74. Performance tests for the emissions of NO_x and CO must be conducted and the results reported in accordance with the test methods set forth in 40 C.F.R. 60.8 and 40 C.F.R. 60, Appendix A. The following test methods must be used: a.) Performance tests for the emissions of NO_x must be conducted using EPA Method 1-4 and 7E. b.) Performance tests for the emissions of CO must be conducted using the EPA Methods 1-4 and 10. In lieu of the above-mentioned test methods, equivalent methods may be used with prior written approval from EPA. The Permittee (MSCC) must notify EPA in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
75. For performance test purposes, sampling ports, platforms, and access must be provided by the Permittee on the emission unit exhaust system in accordance with 40 C.F.R. 60.8(e). [PSD SJ 87-01] Federally Enforceable Through Title V Permit
76. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of CO into the atmosphere in excess of the following emission limits per turbine: The more stringent of 25 ppmvd @ 15% O₂ or 55 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
77. This condition applies prior to the startup of the WMSCP: On and after the date of start up any of the three turbines at MSCP must not discharge (per turbine, and based on 3-hour rolling average) into the atmosphere CO in excess of the following of any of: 1.) The more stringent of 52.0 ppmvd @ 15% O₂ or 94 pounds for loads greater than or equal to 75%. 2.) The more stringent of 62.0 ppmvd @ 15% O₂ or 94 pounds for loads greater than or equal to 35% but less than 75%. 3.) 94 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
78. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of NO_x into the atmosphere in excess of the following emission limits per turbine: The more stringent of 10 ppmvd @ 15% O₂ or 36.1 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
79. This condition applies prior to the startup of the WMSCP: On and after the date of start-up of any of the three turbines, MSCC must not discharge (per turbine, based on 3-hour rolling average) into the atmosphere NO_x (as NO₂) in excess of the following: 1.) The more stringent of 25.0 ppmvd @ 15% O₂ or 85.0 pounds per hour for loads greater than or equal to 75%; 2.) The more stringent of 42.0 ppmvd @ 15% O₂ or 85 pounds per hour for loads greater than or equal to 35% but less than 75%; 3.) 85 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
80. The hourly (3-hour averaging) emissions must not exceed: 1.) 94 pounds of CO and 85 pounds of NO_x; 2.) All CEMs must be operating during startups and shut downs; 3.) The time, date and duration of each startup and shutdown event must be recorded. The records must include the lbs/hour calculations based on the CEM data. These records must be kept for five years following the date of such events. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
81. Prior to the date of startup and thereafter, the Permittee (MSCC) must install, maintain and operate the following continuous monitoring systems (CEMs) in the exhaust stacks: a.) Continuous monitoring systems to measure stack gas NO_x, CO and O₂ concentrations. The systems must meet EPA monitoring performance specification (40 C.F.R. 60.13 and 40 C.F.R. 60, Appendix B, Performance Specifications 2, 3 and 4); b.) A continuous monitoring system to measure stack gas and natural gas volumetric flow rates. The stack gas flow measurement system must meet EPA Performance Specifications for (40 C.F.R. Part 52, Appendix E). [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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82. The Permittee (MSCC) must maintain a file of all measurements, including continuous monitoring systems evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; performance and all other information required by 40 C.F.R. 60 Appendices A-B recorded in a permanent form suitable for inspection. The file must be retained for five years following the date of such measurements, maintenance, reports and records. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
83. The Permittee (MSCC) must notify EPA of the date on which demonstration for the continuous monitoring system performance commences (40 C.F.R. 60.13). This date must be no later than 60 days after full load operation but not later than 180 days after startup. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
84. The Permittee (MSCC) must submit a written report of all excess emissions to EPA for every calendar quarter. The quarterly report must include the following: a.) The magnitude of the excess emissions computed in accordance with 40 C.F.R. 60.13(h), any conversion factors used, and the date and time of commencement and compilation of each time period of excess emissions; b.) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of any equipment. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted must also be reported; c.) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments; d.) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information must be stated in the report; and e.) Excess emissions must be defined as any 3-hour period during which the average emissions of CO, as measured by the CEM exceeds the maximum emission limits set forth in the condition with a CO emission limit, where PSD is cited as the basis of the condition or any 3-hour period during which the average emissions of NOx exceed the maximum emission limits set forth in the condition with a NOx emission limit, where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
85. Excess emissions indicated by the CEM system must be considered violations of the applicable emission limit for the purpose of this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
86. The quality assurance project plan used by the Permittee (MSCC) for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 C.F.R. Part 60, Appendix F, must be available upon request to EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
87. The Permittee (MSCC) must keep a monthly record of all fuel uses. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
88. The proposed power plant is subject to the federal regulations entitled Standards of Performance for New Stationary Sources (40 C.F.R. 60). The owner or operator must meet all applicable requirements of 40 C.F.R. 60 Subparts A and GG of this regulation. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
89. All three turbines will fire natural gas only. The Permittee (MSCC) must only combust pipeline quality natural gas with sulfur content (as S) below 0.75 grains per 100 dry standard cubic feet (dscf). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
90. MSCC shall have legal and operational responsibility and control of all air pollutant emitting activities of the MSCP. This responsibility shall include, but shall not be limited to the following: 1.) Operating and maintaining the project to comply with all federal, state, and local air pollution laws, regulations, orders, and other requirements; 2.) Ensuring the emissions offsets, tradeoffs, or other emission reductions required for this project under permits issued by the U.S. EPA, the District, and/or the California Energy Commission are obtained as required; or 3.) Any violations of any air pollution requirements are the legal responsibility of MSCC, in addition to any other legal responsible entity. Any proposed change to this condition shall require prior written concurrence of the US EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
91. The allowable incidental taking (killing, harming, or harassment) of San Joaquin kit foxes, blunt-nosed leopard lizards, and giant kangaroo rats is confined to the proposed cogeneration plant site one half mile radius around this site (on lands owned or leased by Aera Energy LLC), and associated subject cogeneration plant facilities (including pipelines, transmission lines, temporary equipment stockpiling areas, and access roads) as discussed in the project Application for Certification report (Sun Cogeneration Company and Southern Sierra Energy Company 1985). [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

92. MSCC is required to implement the "Agreement on Conditions for Mitigation of the Biological Impacts of the Midway-Sunset Project" as required by the U.S. Fish and Wildlife Service (USFWS) (Memorandum dated March 16, 1987 from the USFWS to the US EPA). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
93. Any endangered species found dead should be turned in to the California Department of Fish and Game for Analysis. MSCC must also report this event to the USFWS. The USFWS may recommend amendment to the existing project actions pending results of the analysis. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
94. All correspondence as required by this permit shall be forwarded to: 1.) Director, Air Division (Attn: Air-3) EPA Region IX 75 Hawthorne Street San Francisco, CA 94105-3901 Tel: (415) 744-1291 Fax: (415) 744-1076; 2.) Chief, Stationary Source Division, California Air Resource Board P.O. Box 2815 Sacramento, CA 95812; and 3.) Air Pollution Control Officer, San Joaquin Valley Unified APCD 34946 Flyover Court Bakersfield, CA 93308. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
95. MSCC is the legal owner of the gas turbine cogeneration facility. MSCC is jointly owned by Sun Cogeneration Limited Partnership (Sun Cogen LP) and San Joaquin Energy Company. Sun Cogen LP is managed and controlled by a wholly owned subsidiary of Aera Energy LLC. (See Condition 104) [PSD SJ-87-01] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

PTO S-1135-230-5

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-230-5

EXPIRATION DATE: 05/31/2026

SECTION: 17 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

1 MISCELLANEOUS STEAM DUMPING-ROCK BED MUFFLER OPERATION FOR MIDWAY SUNSET COGENERATION BLOWDOWN

PERMIT UNIT REQUIREMENTS

1. Unit shall receive steam only from cogeneration units S-1135-224, '-225, & '-226. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Steam pit shall not be used for more than 6 hours in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Only treated water shall be used as cogenerators steam generators feed water. [District Rule 2080] Federally Enforceable Through Title V Permit
4. This equipment shall not be used on any day when any of the 52 steam generators and heater treaters curtailed to provide cogeneration project offsets are operated unless these units are operated in accordance with District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall keep accurate daily records indicating hours of steam pit usage. Records shall be kept, maintained, and made readily available to District staff upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
6. H2S emissions shall not exceed 19 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emission sampling limits for the following shall not exceed any of the following: PM-10 - 8.40 lb/hr, SO_x (as SO₂) - 42.24 lb/hr, or VOC - 1.00 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name AERA ENERGY LLC
Location HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA
S-1135-230-5 Apr 1 2022 8:45AM - MORTG

PTO S-1135-231-7

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-231-7

EXPIRATION DATE: 05/31/2026

SECTION: 17 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

165 HP DIESEL-FIRED EMERGENCY I.C. ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
4. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. Permittee may utilize an oil analysis program, as specified in 40 CFR 63.6625(i), to extend the oil change requirement. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
9. This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 100 hours per year. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
10. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC
Location: HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA
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12. On a monthly basis, the permittee shall calculate and record the hours of operation for the rolling 12 month period. The hours of operation shall be calculated by summing the hours of operation from the previous 12 months. [District Rule 2520] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC
Location: HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA
S-1135-231-7 Apr 1 2022 8:47AM - HONGAM

PTO S-1135-235-5

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-235-5

EXPIRATION DATE: 05/31/2026

SECTION: 17 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

2,520 BHP DIESEL FIRED CATERPILLAR MODEL #3516STD EMERGENCY IC ENGINE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. Engine shall be equipped with a turbocharger. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Engine shall be equipped with an aftercooler or intercooler. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The sulfur content of the diesel fuel used shall not exceed 0.0015% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201 and Kern County Rule 404] Federally Enforceable Through Title V Permit
7. If the IC engine is fired on CARB regulated diesel fuel, with a supplier certified sulfur content less than 0.0015% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520] Federally Enforceable Through Title V Permit
8. If the IC engine is not fired on CARB regulated diesel fuel, with a supplier certified sulfur content less than 0.0015% by weight, then the owner or operator shall determine the sulfur content of each delivery of diesel fuel being fired in the IC engine. The sulfur content shall be determined using ASTM method D 2880-71. [District Rule 2520] Federally Enforceable Through Title V Permit
9. If the IC engine is not fired on CARB regulated diesel fuel and the sulfur content of the fuel is determined using the method specified on this permit, the records of fuel sulfur content testing results shall be kept, maintained, and made available to the district upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
10. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
11. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
12. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. Permittee may utilize an oil analysis program, as specified in 40 CFR 63.6625(i), to extend the oil change requirement. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC
Location: HEAVY OIL WESTERN STATIONARY SOURCE MIDWAY-SUNSET, KERN COUNTY, CA
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13. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 6 hours per year. [District Rules 2201, 4701, and 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. On a monthly basis, the permittee shall calculate and record the hours of operation for the rolling 12 month period. The hours of operation shall be calculated by summing the hours of operation from the previous 12 months. [District Rule 2520] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of hours of non-emergency operation and of the sulfur content of the diesel fuel used. Such records shall be made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC
Location: HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA
S-1135-235-5 Apr 1 2022 8:47AM - HONGM

**AUTHORITY TO CONSTRUCT
ISSUED PURSUANT TO
PREVENTION OF SIGNIFICANT DETERIORATION ("PSD")
REQUIREMENTS AT 40 C.F.R. § 52.21**

**PSD PERMIT NUMBER: SJ-87-01
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9**

PERMITTEE: Midway Sunset Cogeneration Company (MSCC)

FACILITY LOCATION: Fellows, California.

FACILITY NAME: Midway Sunset Cogeneration Plant (MSCP)

EPA is only modifying those portions of PSD Permit SJ-87-01 that relate to MSCC's installation of low NOx burners on three turbines.

This Authority to Construct (ATC) is revised pursuant to the Prevention of Significant Deterioration ("PSD") requirements of the Clean Air Act, as amended, 42 U.S.C. §§ 7401 - 7671 et seq. Midway Sunset Cogeneration Company (MSCC) is granted approval to modify a 225 MW cogeneration facility in the Midway Sunset Oil Field, at Fellows California, in accordance with the permit application (and plans submitted with the permit application), federal regulations governing the Prevention of Significant Deterioration of air quality (40 C.F.R. § 52.21), and other terms and conditions set forth in this permit.

Failure to comply with any condition or term set forth in this ATC is subject to enforcement pursuant to Section 113 of the Clean Air Act.

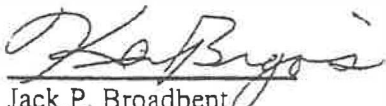
This revised ATC does not relieve the Permittee from the responsibility to comply with any other applicable provisions of the Clean Air Act (including 40 C.F.R. Parts 51, 52, 60, 61 and 63), other federal, Tribal or San Joaquin Valley Unified Air Pollution Control District (District) requirements.

This permit is effective immediately pursuant to 40 C.F.R. §124.15(b)(3).

Initial permit issued: January 27, 1988

Revisions issued: June 11, 1990

June 27, 1997

for 
Jack P. Broadbent
Director, Air Division

4/20/01
Date

BACKGROUND

The Midway Sunset Cogeneration Company (MSCC) received its initial PSD permit (Permit No SJ--87-01) to construct the Midway Sunset Cogeneration Project (MSCP) as a 225 MW power plant in 1988. The MSCP permit was later revised in 1990 and 1997. The present revisions in 2001 allow MSCC to upgrade its three existing General Electric Frame 7E gas turbines by installing dry low NOx (DLN) combustion technology. In addition, the permit eliminates distillate oil as a backup fuel for turbines, changes the ownership of the associated oilfield, and removes two associated oilfield steam generators. EPA is taking this opportunity to consolidate all revisions in one document. We are also reformatting the permit to create a single document that also conforms to Region 9's recent PSD permit format. These latter changes are administrative and do not constitute any substantive changes.

PERMIT CONDITIONS

I. Permit Expiration

This revision to the Authority to Construct (ATC) shall become invalid (1) if construction of the modification is not commenced (as defined in 40 C.F.R. 52.21(b)(8)) within 18 months after the approval takes effect, (2) if construction is discontinued for a period of 18 months or more, or (3) if construction of the modification is not completed within a reasonable time.

II. Notification of Commencement of Construction and Startup

The Permittee must notify EPA in writing of the anticipated date of initial startup (as defined in 40 C.F.R. 60.2) of the power plant not more than sixty (60) days nor less than thirty (30) days prior to such date and must notify EPA in writing of the actual date of commencement of construction and startup within fifteen (15) days after each date.

III. Facility Operation

All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this ATC must at all times be maintained in good working order and be operated as intended so as to minimize air pollutant emissions.

IV. Malfunction

A. Reporting

The Permittee must notify EPA by telephone, facsimile, or electronic mail transmission within two (2) working days following the discovery of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner, which results in an increase in emissions above any allowable

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emission limit stated in Section X this ATC. In addition, the Permittee must notify EPA in writing within fifteen (15) days of any such failure. The notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in Section X, and the methods utilized to mitigate emissions and restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violation of this permit or of any law or regulation that such malfunction may cause, except as provided for in Condition IV-B of this permit.

B. Treatment of Emissions

1. Definition of malfunction: A malfunction means a sudden and unavoidable breakdown of equipment or of a process beyond the reasonable control of the source.
2. Emissions in excess of the limits specified in Section X of this permit shall constitute a violation and may be the subject of enforcement proceedings.
3. Affirmative defense: In the context of an enforcement proceeding, emissions which are below the limits set forth in this Condition IV(B)(3)(i) shall not be subject to penalty if the Permittee retains properly signed, contemporaneous operating logs or other relevant evidence and can demonstrate all of the following:
 - i. A malfunction caused the emissions in excess of the limits in Conditions X.D and X.E;
 - ii. The permitted facility, including the air pollution control equipment and process equipment, was being properly operated at the time of the malfunction;
 - iii. Preventative maintenance was regularly performed in a manner consistent with good practice for minimizing emissions;
 - iv. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
 - v. During the period of the malfunction the Permittee took all reasonable steps to minimize the amount and duration of emissions (including any bypass) that exceeded the emission limits provided in Section X. Reasonable steps to minimize emissions could include, but are not limited to, reducing production to the lowest

level practicable, reducing the material feed that results in the increased emissions, and switching to alternative, less polluting fuels. Where repairs were required, repairs were made in an expeditious fashion when the operator knew or should have known that applicable emission limitations were being exceeded. Off-shift labor and overtime must have been utilized, to the extent practicable, to ensure that such repairs were made as expeditiously as possible; and

vi. The Permittee complied with the malfunction reporting requirements of Condition IV.A of this permit.

4. All emissions, including those associated with a malfunction which may be eligible for an affirmative defense, must be included in all emissions calculations and demonstrations of compliance with mass emission limits (e.g., daily, monthly, and annual emission limits) specified in this permit.
5. This provision is in addition to any emergency or malfunction provision contained in any applicable requirement or elsewhere in this permit.

V. Right of Entry

The EPA Regional Administrator, and/or their authorized representative, upon the presentation of credentials, must be permitted:

1. to enter the premises where the source is located or where any records are required to be kept under the terms and conditions of this ATC; and
2. at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this ATC; and
3. to inspect any equipment, operation, or method required in this ATC; and
4. to sample emissions from the source(s).

VI. Transfer of Ownership

In the event of any changes in control or ownership of the facilities to be constructed, the ATC must be binding on all subsequent owners and operators. The Permittee must notify the succeeding owner and operator of the existence of this ATC and its conditions by letter, a copy of which must be forwarded to the EPA.

VII. Severability

The provisions of this ATC are severable, and, if any provision of the ATC is held invalid, the remainder of this ATC must not be affected thereby.

VIII. Other Applicable Regulations

The Permittee must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 C.F.R. Parts 52, 60, 62, 63, and all other applicable federal, state, and local air quality regulations.

IX. Paperwork Reduction Act

Any requirements established by this permit for the gathering and reporting of information are not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because this permit is not an "information collection request" within the meaning of 44 U.S.C. §§ 3502(4), 3502 (11), 3507, 3512, and 3518. Furthermore, this permit and any information gathering and reporting requirements established by this permit are exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons, 44 U.S.C. § 3502(4) and § 3502(11); 5 C.F.R. Part 1320.5(a).

X. Special Conditions

A. Certification

The Permittee must notify the EPA in writing of compliance with Conditions X.B and X.G below, and must make such notification within fifteen (15) days of such compliance. The letter must be signed by a responsible official of the Permittee.

B. Air Pollution Control Equipment and Operation

On or before the date of startup (as defined in 40 C.F.R. 60.2) of the Western Midway Sunset Cogeneration Project (WMSCP; PSD Permit No. SJ--00-01) and thereafter the Permittee must install, continuously operate, and maintain the Dry Low NOx (DLN) combustion systems to reduce NOx emissions from each of its three turbines. The Permittee shall also use proper combustion techniques for the control of CO emissions from the equipment at MSCP.

C. Performance Tests

1. Within 60 days after achieving the base load, but no later than 180 days after initial startup of all three modified turbines (as defined in 40 C.F.R. 60.2), and annually thereafter (at about the anniversary of the initial

performance test), the Permittee must conduct performance tests (as described in 40 C.F.R. 60.8) for NO_x and CO on the exhaust stack gases. The Permittee must furnish the District, the California Air Resources Board (CARB), and the EPA a written report of the results of such tests. Upon written request from the Permittee, and adequate justification, EPA may waive a specific annual test and/or allow for testing to be done at less than maximum operating capacity.

2. Performance tests for the emissions of NO_x and CO must be conducted and the results reported in accordance with the test methods set forth in 40 C.F.R. 60.8 and 40 C.F.R. 60, Appendix A. The following test methods must be used:
 - a. Performance tests for the emissions of NO_x must be conducted using EPA Methods 1-4 and 7E.
 - b. Performance tests for the emissions of CO must be conducted using EPA Methods 1-4 and 10.

In lieu of the above-mentioned test methods, equivalent methods may be used with prior written approval from EPA.

The Permittee must notify EPA in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test.

3. For performance test purposes, sampling ports, platforms, and access must be provided by the Permittee on the emission unit exhaust system in accordance with 40 C.F.R. 60.8(e).

D. Emission Limits for Carbon Monoxide (CO)

On and after the date of startup of the WMSCP (PSD Permit No. SJ--00-01), the Permittee must not discharge or cause the discharge of CO into the atmosphere in excess of the following emission limits per turbine:

1. The more stringent of 25 ppmvd @ 15% O₂ or 55 pounds per hour, based on 3-hour rolling average.

The following conditions apply prior to the startup of the WMSCP:

On and after the date of start up any of the three turbines at MSCP must not discharge (per turbine, and based on 3-hour rolling average) into the atmosphere CO in excess of the following of any of :

1. The more stringent of 52.0 ppmvd @ 15% O₂ or 94 pounds for loads greater than or equal to 75%.
2. The more stringent of 62.0 ppmvd @ 15% O₂ or 94 pounds for loads greater than or equal to 35% but less than 75%.
3. 94 pounds per hour for loads less than 35%.

E. Emission Limits for Nitrogen Oxides (NO_x)

On and after the date of startup of the WMSCP (PSD Permit No. SJ-- 00-01), the Permittee must not discharge or cause the discharge of NO_x into the atmosphere in excess of the following emission limits per turbine:

1. The more stringent of 10 ppmvd @ 15% O₂ or 36.1 pounds per hour, based on 3-hour rolling average.

The following conditions apply prior to the startup of the WMSCP:

On and after the date of start-up of any of the three turbines, MSCC must not discharge (per turbine, based on 3-hour rolling average) into the atmosphere NO_x (as NO₂) in excess of the following:

1. The more stringent of 25.0 ppmvd @ 15% O₂ or 85.0 pounds per hour for loads greater than or equal to 75%.
2. The more stringent of 42.0 ppmvd @ 15% O₂ or 85 pounds per hour for loads greater than or equal to 35% but less than 75%.
3. 85 pounds per hour for loads less than 35%.

F. Emission Limits at Startups or Shutdowns

1. The hourly (3-hour averaging) emissions must not exceed:
94 pounds of CO and 85 pounds of NO_x
2. All CEMs must be operating during startups and shut downs.
3. The time, date and duration of each startup and shutdown event must be recorded. The records must include the lbs/hour calculations based on the CEM data. These records must be kept for five years following the date of such events.

G. Continuous Emissions Monitoring Systems

1. Prior to the date of startup and thereafter, the Permittee must install, maintain and operate the following continuous monitoring systems (CEMs) in the exhaust stacks:
 - a. Continuous monitoring systems to measure stack gas NO_x, CO and O₂ concentrations. The systems must meet EPA monitoring performance specification (40 C.F.R. 60.13 and 40 C.F.R. 60, Appendix B, Performance Specifications 2, 3 and 4).
 - b. A continuous monitoring system to measure stack gas and natural gas volumetric flow rates. The stack gas flow measurement system must meet EPA Performance Specifications for (40 C.F.R. Part 52, Appendix E).

H. Reporting and Record Keeping

1. The Permittee must maintain a file of all measurements, including continuous monitoring systems evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; performance and all other information required by 40 C.F.R. 60 Appendices A-B recorded in a permanent form suitable for inspection. The file must be retained for five years following the date of such measurements, maintenance, reports and records.
2. The Permittee must notify EPA of the date on which demonstration for the continuous monitoring system performance commences (40 C.F.R. 60.13). This date must be no later than 60 days after full load operation but not later than 180 days after startup.
3. In addition to reporting requirements under Condition IV.A of this permit, the Permittee must submit a written report of all excess emissions to EPA for every calendar quarter. The quarterly report must include the following:
 - a. The magnitude of the excess emissions computed in accordance with 40 C.F.R. 60.13(h), any conversion factors used, and the date and time of commencement and compilation of each time period of excess emissions.
 - b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of any equipment. The nature and cause of any malfunction (if known) and the corrective

action taken or preventative measures adopted must also be reported.

- c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments.
 - d. When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information must be stated in the report.
 - e. Excess emissions must be defined as any 3-hour period during which the average emissions of CO, as measured by the CEM exceeds the maximum emission limits set forth in Condition X.D or any 3-hour period during which the average emissions of NOx exceed the maximum emission limits set forth in Conditions X.E.
- 4. Excess emissions indicated by the CEM system must be considered violations of the applicable emission limit for the purpose of this permit.
 - 5. The quality assurance project plan used by the Permittee for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 C.F.R. Part 60, Appendix F, must be available upon request to EPA.
 - 6. The Permittee must keep a monthly record of all fuel uses.

I. New Source Performance Standards

The proposed power plant is subject to the federal regulations entitled Standards of Performance for New Stationary Sources (40 C.F.R. 60). The owner or operator must meet all applicable requirements of 40 C.F.R. 60 Subparts A and GG of this regulation.

J. Fuel Use

All three turbines will fire natural gas only. The Permittee must only combust pipeline quality natural gas with sulfur content (as S) below 0.75 grains per 100 dry standard cubic feet (dscf).

K. Legal Responsibility

MSCP shall have legal and operational responsibility and control of all air pollutant emitting activities of the MSCP. This responsibility shall include, but shall not be limited to the following:

1. Operating and maintaining the project to comply with all federal, state, and local air pollution laws, regulations, orders, and other requirements.
2. Ensuring the emissions offsets, tradeoffs, or other emission reductions required for this project under permits issued by the U.S. EPA, the District, and/or the California Energy Commission are obtained as required.
3. Any violations of any air pollution requirements are the legal responsibility of MSCC, in addition to any other legal responsible entity.

Any proposed change to this condition shall require prior written concurrence of the US EPA.

L. Shutdown Requirements

1. In accordance with the emissions offset plan proposed by the applicant for the District (dated November 12, 1987) and the emissions offset plan for the U.S. EPA (dated July 21, 1987), Aera Energy LLC must not operate the following four steam generators¹ (listed by District permit numbers S-1135-119, S-1135-122, S-1135-123, and S-1135-115) simultaneously with the firing of the MSCP turbines unless one or more of the MSCP turbines is shutdown:

Andersen-Goodwin Lease: S-1135-119, S-1135-122, S-1135-123

Neely Lease: S-1135-115

2. MSCC shall maintain a record of the date(s), time(s), and duration(s) of the shutdown of any of the above mentioned steam generators.
3. Aera Energy LLC shall not lease or modify the permit conditions for any of the above generators for use in the Midway Sunset Oil field, unless creditable emissions reductions (as defined in 40 C.F.R. 52.21), at a ratio of at least 1:1, are provided for emissions from those generators.
4. Aera Energy LLC shall not modify any of the District Permit to Operate numbers. If any of the above steam generators are issued new Permit to Operate numbers by the District, Aera Energy LLC shall notify the U.S. EPA in writing of this action and shall make such notification upon issuance of a new Permit to Operate

¹Aera Energy LLC is the legal owner of the subject steam generators and of the leases on which the steam generators are located. MSCC is the legal owner of the gas turbine cogeneration facility. MSCC is jointly owned by Sun Cogeneration Limited Partnership (Sun Cogen LP) and San Joaquin Energy Company. Sun Cogen LP is managed and controlled by a wholly owned subsidiary of Aera Energy LLC. [See Special Condition X.K.]

number. This letter shall include the original District Permit to Operate number(s) of the subject generator(s) and a copy of the new Permit to Operate issued by the District.

5. Aera Energy LLC shall notify the U.S. EPA in writing of the intention to sell, or potential sale, of any of the above generators and shall make such notification prior to the District's final action of the re-permitting process associated with the sale of a generators. This letter shall include the following:
 - a. The subject steam generator as identified by its District Permit to Operate number;
 - b. The name of the buyer (as identified by the company name) of the steam generator; and
 - c. An estimated date of the final action of the re-permitting process by the District.

B. Endangered Species Act Compliance

1. The allowable incidental taking (killing, harming, or harassment) of San Joaquin kit foxes, blunt-nosed leopard lizards, and giant kangaroo rats is confined to the proposed cogeneration plant site one half mile radius around this site (on lands owned or leased by Aera Energy LLC), and associated subject cogeneration plant facilities (including pipelines, transmission lines, temporary equipment stockpiling areas, and access roads) as discussed in the project Application for Certification report (Sun Cogeneration Company and Southern Sierra Energy Company 1985).
2. MSCC is required to implement the "Agreement on Conditions for Mitigation of the Biological Impacts of the Midway-Sunset Project" as required by the U.S. Fish and Wildlife Service (USFWS) (Memorandum dated March 16, 1987 from the USFWS to the US EPA).
3. Any endangered species found dead should be turned in to the California Department of Fish and Game for Analysis. MSCC must also report this event to the USFWS. The USFWS may recommend amendment to the existing project actions pending results of the analysis.

XI. Agency Notifications

All correspondence as required by this Approval to Construct/Modify must be forwarded to:

1. Director, Air Division (Attn: Air-3)
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
Tel: (415) 744-1291
Fax: (415) 744-1076
2. Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
3. Air Pollution Control Officer
San Joaquin Valley Unified APCD
2700 M Street, Suite 275
Bakersfield, CA 93301-2370



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

☐ Northern Region☐ Central Region☒ Southern Region

QUARTERLY CEMS EXCESS EMISSION AND DOWNTIME SUMMARY

1st ☒ JAN - MAR 20253rd ☐ JUL - SEPT 202nd ☐ APR - JUN 204th ☐ OCT - DEC 20Facility Name: MIDWAY SUNSET COGENERATION COMPANY Permit #: S-1135-224-30Location: UNIT A; 3466 W. CROCKER SPRINGS ROAD City: FELLOWSAIRS #: _____ NSPS Source?: ☐ Yes ☐ NoProcess Equipment Description: 78.2 MW GAS FIRED TURBINE COGENERATION UNITPollutants Monitored: ☒ NO_x ☐ SO_x ☒ CO ☐ Opacity ☒ O₂ ☐ CO₂ ☐ NH₃
☐ Other: _____Total Hours Process Equipment Operated During Quarter: 84

CEM Unit Information				
Pollutant	Manufacturer / Model	Serial #	Date Installed	Total Hours CEMS Operated During Qtr
NO _x	HORIBA/CMA-EC662L1	43165430012	10/06	2160
SO _x				
CO	HORIBA/CMA-EC662L1	43165430012	10/06	2160
Opacity				
O ₂	HORIBA/CMA-EC662L1	43165430012	10/06	2160
CO ₂	HORIBA/CMA-EC662L1	43165430012	10/06	2160
NH ₃				
Other				

Date of Last Performance Specification Test								
Pollutant	NO _x	SO _x	CO	Opacity	O ₂	CO ₂	NH ₃	Other
Date	1/23/25		1/23/25		1/23/25	1/23/25		
Type	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA
	☒ CGA	☐ CGA	☒ CGA	☐ CGA	☒ CGA	☒ CGA	☐ CGA	☐ CGA
	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity

UNIT A

Emission Limits (From Operating Permits)						
Pollutant	ppm @ O ₂ %	lb/MMBtu	lb/hr	lb/day	NSPS	ppm @ O ₂
NO _x	5 @ 15%	.018	17.66			
SO _x		.001	.92			
CO	25 @ 15%	.057	54.91			
Opacity						
O ₂						
CO ₂						
NH ₃	10 @ 15%					
VOC/PM10		.009/.010	9.00/9.98			

Excess Emissions Information (Report in Hours)								
Pollutant	Start-Up / Shutdown	Process Problems	Breakdown	Other Known	Other Unknown	Total Hrs Excess	Total Op Hrs for Qtr	% Excess
NO _x	42	0	0	7*	0	49	84	58.3
SO _x								
CO	34	0	0	0	0	34	84	40.5
Opacity								
O ₂								
CO ₂								
NH ₃								
Other								

INSPECTOR NOTE: Facility permit allows for startup and shutdown emissions. These are not permit exceedances.

*See Section 6 Variance S-25-04S Summary Report CC-2270 Rev.1 includes Deviation Report CC-2267 Rev.1 (2hrs), Deviation Report CC-2268 Rev.1 (1hrs) & Deviation Report CC-2271 Rev.1 (4hrs)

Excess emissions caused by a startup after shutdown due to a malfunction should be reported as an excess emission due to an equipment breakdown. The source is not however, exempt from emission limits. All exceedances are to be reported in whole hour increments.

CEM Downtime Information (Report in Hours)								
Pollutant	Monitor Malfunction	Non-Monitor Malfunction	Q/A - Cal	Other	Unknown	Total Hrs Downtime	Total Hrs	% Downtime
NO _x	0	0	0	0	0	0	2160	0
SO _x								
CO	0	0	0	0	0	0	2160	0
Opacity								
O ₂	0	0	0	0	0	0	2160	0
CO ₂	0	0	0	0	0	0	2160	0
NH ₃	0	0	0	0	0	0	2160	0
Other								

Include a summary of all downtime dates, times, duration, and activities that occurred during the reporting period or submit copies of all related breakdown reports and Title V deviations.

Non-CEM malfunctions are incidents that result in the CEM system being down but are not associated with a malfunction of the CEM system, i.e. plant power failure.

Reports must be submitted within 30 days of the end of the quarter for which the report was generated.



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QUARTERLY CEMS EXCESS EMISSION AND DOWNTIME SUMMARY

1st ☒ JAN - MAR 20253rd ☐ JUL - SEPT 20__2nd ☐ APR - JUN 20__4th ☐ OCT - DEC 20__Facility Name: MIDWAY SUNSET COGENERATION COMPANY Permit #: S-1135-225-29Location: UNIT B; 3466 W. CROCKER SPRINGS ROAD City: FELLOWSAIRS #: _____ NSPS Source?: ☐ Yes ☐ NoProcess Equipment Description: 78.2 MW GAS FIRED TURBINE COGENERATION UNITPollutants Monitored: ☒ NO_x ☐ SO_x ☒ CO ☐ Opacity ☒ O₂ ☐ CO₂ ☐ NH₃
☐ Other: _____Total Hours Process Equipment Operated During Quarter: 400

CEM Unit Information				
Pollutant	Manufacturer / Model	Serial #	Date Installed	Total Hours CEMS Operated During Qtr
NO _x	HORIBA/CMA-EC662L1	4326876010	11/06	2160
SO _x				
CO	HORIBA/CMA-EC662L1	4326876010	11/06	2160
Opacity				
O ₂	HORIBA/CMA-EC662L1	4326876010	11/06	2160
CO ₂	HORIBA/CMA-EC662L1	4326876010	11/06	2160
NH ₃				
Other				

Date of Last Performance Specification Test								
Pollutant	NO _x	SO _x	CO	Opacity	O ₂	CO ₂	NH ₃	Other
Date	1/23/25		1/23/25		1/23/25	1/23/25		
Type	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA
	☒ CGA	☐ CGA	☒ CGA	☐ CGA	☒ CGA	☒ CGA	☐ CGA	☐ CGA
	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity

Unit B

Emission Limits (From Operating Permits)						
Pollutant	ppm @ O ₂ %	lb/MMBtu	lb/hr	lb/day	NSPS	ppm @ O ₂
NO _x	5 @ 15%	.018	17.66			
SO _x		.001	.92			
CO	25 @ 15%	.057	54.91			
Opacity						
O ₂						
CO ₂						
NH ₃	10 @ 15%					
VOC/PM10		.009/.010	9.00/9.98			

Excess Emissions Information (Report in Hours)								
Pollutant	Start-Up / Shutdown	Process Problems	Breakdown	Other Known	Other Unknown	Total Hrs Excess	Total Op Hrs for Qtr	% Excess
NO _x	75	0	0	3*	0	78	400	19.5
SO _x								
CO	73	0	0	0	0	73	400	18.3
Opacity								
O ₂								
CO ₂								
NH ₃								
Other								

INSPECTOR NOTE: Facility permit allows for startup and shutdown emissions. These are not permit exceedances.

*See Section 6 Deviation Report CC-2273 (1hr)

*2 of these hours were caused by a Primary Reignition did not exceed the 15ppm limit.

Excess emissions caused by a startup after shutdown due to a malfunction should be reported as an excess emission due to an equipment breakdown. The source is not however, exempt from emission limits. All exceedances are to be reported in whole hour increments.

CEM Downtime Information (Report in Hours)								
Pollutant	Monitor Malfunction	Non-Monitor Malfunction	Q/A - Cal	Other	Unknown	Total Hrs Downtime	Total Hrs	% Downtime
NO _x	0	0	0	0	0	0	2160	0.00
SO _x								
CO	0	0	0	0	0	0	2160	0.00
Opacity								
O ₂	0	0	0	0	0	0	2160	0.00
CO ₂	0	0	0	0	0	0	2160	0.00
NH ₃	0	0	0	0	0	0	2160	0.00
Other								

Include a summary of all downtime dates, times, duration, and activities that occurred during the reporting period or submit copies of all related breakdown reports and Title V deviations.

Non-CEM malfunctions are incidents that result in the CEM system being down but are not associated with a malfunction of the CEM system, i.e. plant power failure.

Reports must be submitted within 30 days of the end of the quarter for which the report was generated.



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

☐ Northern Region

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QUARTERLY CEMS EXCESS EMISSION AND DOWNTIME SUMMARY

1st ☒ JAN - MAR 2025

3rd ☐ JUL - SEPT 20__

2nd ☐ APR - JUN 20__

4th ☐ OCT - DEC 20__

Facility Name: MIDWAY SUNSET COGENERATION COMPANY Permit #: S-1135-226-28

Location: UNIT C; 3466 W. CROCKER SPRINGS ROAD City: FELLOWS

AIRS #: _____ NSPS Source?: ☐ Yes ☐ No

Process Equipment Description: 78.2 MW GAS FIRED TURBINE COGENERATION UNIT

Pollutants Monitored: ☒ NO_x ☐ SO_x ☒ CO ☐ Opacity ☒ O₂ ☐ CO₂ ☐ NH₃
☐ Other: _____

Total Hours Process Equipment Operated During Quarter: 270

CEM Unit Information				
Pollutant	Manufacturer / Model	Serial #	Date Installed	Total Hours CEMS Operated During Qtr
NO _x	HORIBA/CMA-EC662L1	F0602X0R	11/06	2160
SO _x				
CO	HORIBA/CMA-EC662L1	F0602X0R	11/06	2160
Opacity				
O ₂	HORIBA/CMA-EC662L1	F0602X0R	11/06	2160
CO ₂	HORIBA/CMA-EC662L1	F0602X0R	11/06	2160
NH ₃				
Other				

Date of Last Performance Specification Test								
Pollutant	NO _x	SO _x	CO	Opacity	O ₂	CO ₂	NH ₃	Other
Date	1/24/25		1/24/25		1/24/25	1/24/25		
Type	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA
	☒ CGA	☐ CGA	☒ CGA	☐ CGA	☒ CGA	☒ CGA	☐ CGA	☐ CGA
	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☐ Linearity

Unit C

Emission Limits (From Operating Permits)						
Pollutant	ppm @ O ₂ %	lb/MMBtu	lb/hr	lb/day	NSPS	ppm @ O ₂
NO _x	5 @ 15%	.018	17.66			
SO _x		.001	.92			
CO	25 @ 15%	.057	54.91			
Opacity						
O ₂						
CO ₂						
NH ₃	10 @ 15%					
VOC/PM10		.009/.010	9.00/9.98			

Excess Emissions Information (Report in Hours)								
Pollutant	Start-Up / Shutdown	Process Problems	Breakdown	Other Known	Other Unknown	Total Hrs Excess	Total Op Hrs for Qtr	% Excess
NO _x	72	0	0	3*	0	75	270	27.8
SO _x								
CO	63	0	0	0	0	63	270	23.3
Opacity								
O ₂								
CO ₂								
NH ₃								
Other								

INSPECTOR NOTE: Facility permit allows for startup and shutdown emissions. These are not permit exceedances.

*See Section 6 Variance S-25-04S Summary Report CC-2270 Rev.1 & Deviation Report CC-2269 Rev.1 (3hrs)

Excess emissions caused by a startup after shutdown due to a malfunction should be reported as an excess emission due to an equipment breakdown. The source is not however, exempt from emission limits. All exceedances are to be reported in whole hour increments.

CEM Downtime Information (Report in Hours)								
Pollutant	Monitor Malfunction	Non-Monitor Malfunction	Q/A - Cal	Other	Unknown	Total Hrs Downtime	Total Hrs	% Downtime
NO _x	0	0	0	0	0	0	2160	0
SO _x								
CO	0	0	0	0	0	0	2160	0
Opacity								
O ₂	0	0	0	0	0	0	2160	0
CO ₂	0	0	0	0	0	0	2160	0
NH ₃	0	0	0	0	0	0	2160	0
Other								

Include a summary of all downtime dates, times, duration, and activities that occurred during the reporting period or submit copies of all related breakdown reports and Title V deviations.

Non-CEM malfunctions are incidents that result in the CEM system being down but are not associated with a malfunction of the CEM system, i.e. plant power failure.

Reports must be submitted within 30 days of the end of the quarter for which the report was generated.

Wasim Melek

From: Stephanie Urias on behalf of Ray Smith
Sent: Thursday, October 12, 2023 1:12 PM
To: Stephanie Urias
Subject: Midway Sunset AOR - AQ Request

Good morning, Dave:

Per my air quality staff, the cover letters for the Midway Sunset 2016 Quarterly Reports stated, "the numerous starts and shutdowns (transitions) dictated by CAISO are used as quick responses to electric grid variations and are reflected in this quarterly report's "Number of hours of excess emissions due to start-up/shutdown for Units A and B".

The CEMS Source Information spreadsheet also shows excess emission information for each pollutant. It is clear from the Quarterly Reports that all excess emissions are due to start-up and shutdown. It is staff's understanding that these "excess emissions" are actually just in excess of the steady state, routine operating emission rate (which is defined by **Condition of Certification AQ-18**), which are not applicable during a start-up/shutdown event. District Rule 4703 allows two hours for startup, at which time emissions will be elevated above the steady state, routine operation emission rate (defined by **AQ-18**). These emissions are then reported in the CEM Source Information spreadsheet as "Number of hours of excess emissions due to start-up/shutdown".

However, Energy Commission **Condition of Certification AQ-45**, and **PTO condition 39**, have established emission limits during startup and shutdown periods. For this reason, the information provided as "Number of hours of excess emissions due to start-up/shutdown" has led some reviewers to think that the facility had excess emissions above those allowed by **AQ-45** and **PTO condition 39**. The individual Unit CEMS Reports highlight each startup/shutdown event and provides the corresponding startup/shutdown emissions. These reports show that startup/shutdown emissions are in compliance with the startup/shutdown emission limits in **AQ-45** and **PTO condition 39**. To alleviate any potential future confusion, staff is requesting that you include a statement (as part of the CEMS Source Information spreadsheet) that the information provided as "Number of hours of excess emissions due to start-up/shutdown" represents only the excess of the steady state operating emission rate in **AQ-18** and is exempt during a startup condition per District Rule 4703, and that the facility continues to comply with the startup/shutdown emission limits in **AQ-45** and **PTO condition 39**.

Additionally, there are several conditions of certification that require supporting information to be submitted as part of the Quarterly Reports to demonstrate compliance with the **Conditions of Certification (i.e. AQ-18, -21, -26, -39, -44, -45, -46, -47, -48, -49, -52, -53)**. For future reports, staff is also requesting that you please address each of these conditions specifically, and provide the required information listed in the "Verification" of each of the conditions of certification. This can be done by creating a table that list each condition that is required to be addressed in the Quarterly Report, and by providing a brief description of the condition limit, or requirement, a brief discussion of whether or not the facility complied with this condition during the reporting requirement, and explain where the supporting information demonstrating compliance can be found. For example, compliance with **AQ-45** could be demonstrated as follows:

Condition of Certification	Description	Limit	Discussion of Compliance	Section
AQ-45	Startup/Shutdown Emissions	NOx - 140 lbm/hr averaged over 2 hours as NO2 CO - 94 lbm/hr averaged over 2 hours	Plant remains in compliance with this condition. Continuous Emissions Monitoring data has been collected and made available.	Section 5 – Unit CEMs Report

Please let me know if you have any questions regarding these requests.

Thank you,
Mary



MARY DYAS | Compliance Project Manager

Direct: (916) 651-8891 | Fax: (916) 654-3882

mary.dyas@energy.ca.gov

Regular Contact Hours: Monday-Thursday, 7:00 a.m. to 3:00 p.m.

CALIFORNIA ENERGY COMMISSION

Siting, Transmission, & Environmental Protection Division

1516 Ninth Street, Sacramento, CA 95814

www.energy.ca.gov

Energy Commission Quarterly Air Report Compliance Confirmation

UNIT A

1st Quarter 2025
March 31, 2025

Condition of Certification	Description	Limit	Discussion of Compliance	Documentation
AQ - 18	Routine operation emission limits	NOx - 17.66 lb/hr CO - 54.91 lb/ hr	Hours Excess Nox - SIX* Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
PTO - 20	Routine operation emission limits	Nox - 0.018 lb/ Mmbtu CO - 0.057 lb/ Mmbtu Ammonia 10ppm	Hours Excess Nox - SEVEN* Hours Excess CO - ZERO Hours Excess Ammonia - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
PTO-21	Routine operation emission limits	Nox - 5.0 ppm CO - 25ppm	Hours Excess Nox - SIX* Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
PTO -73 PTO -71	Routine operation emission limits Loads > 75%	Nox - 25.0 ppm or 85 lb/hr; averaged over 3 hours CO - 52.0 ppm or 94 lb/hr; averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
AQ - 21	CEMS Report Submission	Reports submitted Quarterly to SJVAPCD and Energy Commission	Quarterly Report (Also submitted to CARB and EPA)	Quarterly Report
AQ - 39	Steam Pit Emissions	Operation of steam pit shall not constitute a nuisance.	Provide, in Quarterly Report, any nuisance reports from the operation of the steam pit.	No Nuisance reports received.
AQ - 44	Start -ups / Shutdowns	Start - up: 2 hours Shutdown: 2 hours	Start-ups/Shutdowns notated in margins of CEMS reports	Quarterly Report Section 5 CEMS Report
AQ - 45	Start-up or shutdown emission limits	Nox - 140 lb/hr; 2 hour avg. CO - 94 lb/hr; 2 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
PTO - 73	Start-up or shutdown emission limits (loads < 35 %)	Nox - 85 lb/hr; 3 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
PTO - 71	Start - up or shutdown emission limits (loads < 35%)	CO - 94 lb/hr; 3 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
AQ - 46	Reduced loads	Load reduced ≤ one hour in order to change the position of the exhaust gas diverter gate.	Reduced load periods are notated in the margins of CEMS reports	Quarterly Report Section 5, Unit A CEMS Reports
AQ - 47	Reduced load emission limits	Nox - 140 lb/hr CO - 94 lb/hr	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
PTO - 73 PTO - 71	Reduced load emission limits (loads < 35%)	Nox - 85 lb/hr; averaged over 3 hours CO - 94 lb/hr averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports

Energy Commission Quarterly Air Report Compliance Confirmation

UNIT A

1st Quarter 2025
March 31, 2025

Condition of Certification	Description	Limit	Discussion of Compliance	Documentation
PTO - 73 PTO - 71	Reduced load emission limits (loads $\geq$ 35% and < 75%)	Nox - 42.0 ppm or 85 lb/hr; averaged over 3 hours CO - 62.0 ppm or 94 lb/hr averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
AQ - 48	Emission of unreacted ammonia slip	10 ppm @ 15% O ₂ averaged over 24 hours	Hours of Excess NH ₃ slip - ZERO	Quarterly Report Section 5, Unit A CEMS Reports
AQ -49	Calibration drift (CD) of CEMS	Recalibrate whenever daily zero or high-level exceeds 5% for 5 consecutive days or 10% during any CD check the analyzer is deemed out-of-control. If out-of-control, MSCC is to take appropriate corrective action and repeat the CD check.	Report CD checks for each day as part of the quarterly report. Calibration reports are available by request.	PTO 83 allows MSCC to record the monitoring device calibration checks in a permanent form suitable for inspection. The file is to be retained for five years following the date of such measurements.
AQ - 52	Exhaust gas temperature at SCR	When SCR is operated, MSCC shall monitor and record the exhaust gas temperature at the SCR.	Quarterly Report	Quarterly Report Section 5, Unit A CEMS Reports
AQ - 53	Ammonia injection	When SCR is operated, ammonia shall be injected whenever the SCR catalyst exceeds the manufacturer's minimum ammonia injection temperature.	Quarterly Report	Quarterly Report Section 5, Unit A CEMS Reports
AQ - 56	Start - up, shutdown, or reduced load	Nox - 5.0 ppm CO - 25.0 ppm Dry@15%O ₂	Quarterly Report	Quarterly Report Section 5, Unit A CEMS Reports

NOTE: AQ – Refers to a California Energy Commission Air Quality Condition.

NOTE: PTO – Refers to a San Joaquin Valley Air Pollution Control District Permit to Operate Condition.

NOTE: The information provided as “number of hours of excess emissions due to start-up/shutdown” represents only the excess of the steady state operation emission rate in AQ-18 and is exempt during a start-up condition per District Rule 4703, and the facility continues to comply with all start-up/shutdown emission limits in AQ-45 and PTO Conditions 32.

NOTE: *See Section 6 Variance S-25-04S Summary Report CC-2270 Rev.1 includes Deviation Report CC-2267 Rev.1 (2hrs), Deviation Report CC-2268 Rev.1 (1hrs) & Deviation Report CC-2271 Rev.1 (4hrs)

Energy Commission Quarterly Air Report Compliance Confirmation

UNIT B

1st Quarter 2025
March 31, 2025

Condition of Certification	Description	Limit	Discussion of Compliance	Documentation
AQ - 18	Routine operation emission limits	NOx - 17.66 lb/hr CO - 54.91 lb/ hr	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
PTO - 20	Routine operation emission limits	Nox - 0.018 lb/ Mmbtu CO - 0.057 lb/ Mmbtu Ammonia 10ppm	Hours Excess Nox - ZERO Hours Excess CO - ZERO Hours Excess Ammonia - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
PTO-21	Routine operation emission limits	Nox - 5.0 ppm CO - 25ppm	Hours Excess Nox - THREE* Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
PTO -73 PTO -71	Routine operation emission limits Loads > 75%	Nox - 25.0 ppm or 85 lb/hr; averaged over 3 hours CO - 52.0 ppm or 94 lb/hr; averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
AQ - 21	CEMS Report Submission	Reports submitted Quarterly to SJV APCD and Energy Commission	Quarterly Report (Also submitted to CARB and EPA)	Quarterly Report
AQ - 39	Steam Pit Emissions	Operation of steam pit shall not constitute a nuisance.	Provide, in Quarterly Report, any nuisance reports from the operation of the steam pit.	*Quarterly Report Section 9
AQ - 44	Start -ups / Shutdowns	Start - up: 2 hours Shutdown: 2 hours	Start-ups/Shutdowns notated in margins of CEMS reports	No Nuisance reports received.
AQ - 45	Start-up or shutdown emission limits	Nox - 140 lb/hr; 2 hour avg. CO - 94 lb/hr; 2 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5 CEMS Report
PTO - 73	Start-up or shutdown emission limits (loads < 35 %)	Nox - 85 lb/hr; 3 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
PTO - 71	Start - up or shutdown emission limits (loads < 35%)	CO - 94 lb/hr; 3 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
AQ - 46	Reduced loads	Load reduced ≤ one hour in order to change the position of the exhaust gas diverter gate.	Reduced load periods are notated in the margins of CEMS reports	Quarterly Report Section 5, Unit B CEMS Reports
AQ - 47	Reduced load emission limits	Nox - 140 lb/hr CO - 94 lb/hr	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
PTO - 73 PTO - 71	Reduced load emission limits (loads < 35%)	Nox - 85 lb/hr; averaged over 3 hours CO - 94 lb/hr averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports

Energy Commission Quarterly Air Report Compliance Confirmation

UNIT B

1st Quarter 2025
March 31, 2025

Condition of Certification	Description	Limit	Discussion of Compliance	Documentation
PTO - 73 PTO - 71	Reduced load emission limits (loads $\geq$ 35% and $<$ 75%)	Nox - 42.0 ppm or 85 lb/hr; averaged over 3 hours CO - 62.0 ppm or 94 lb/hr averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
AQ - 48	Emission of unreacted ammonia slip	10 ppm @ 15% O ₂ averaged over 24 hours	Hours of Excess NH ₃ slip - ZERO	Quarterly Report Section 5, Unit B CEMS Reports
AQ -49	Calibration drift (CD) of CEMS	Recalibrate whenever daily zero or high-level exceeds 5% for 5 consecutive days or 10% during any CD check the analyzer is deemed out-of-control. If out-of-control, MSCC is to take appropriate corrective action and repeat the CD check.	as part of the quarterly report. Calibration	Quarterly Report Section 5, Unit B CEMS Reports
AQ - 52	Exhaust gas temperature at SCR	When SCR is operated, MSCC shall monitor and record the exhaust gas temperature at the SCR.	Quarterly Report	PTO 83 allows MSCC to record the monitoring device calibration checks in a permanent form suitable for inspection. The file is to be retained for five years following the date of such measurements.
AQ - 53	Ammonia injection	When SCR is operated, ammonia shall be injected whenever the SCR catalyst exceeds the manufacturer's minimum ammonia injection temperature.	Quarterly Report	Quarterly Report Section 5, Unit B CEMS Reports
AQ - 56	Start - up, shutdown, or reduced load	Nox - 5.0 ppm CO - 25.0 ppm Dry@15%O ₂	Quarterly Report	Quarterly Report Section 5, Unit B CEMS Reports

NOTE: AQ – Refers to a California Energy Commission Air Quality Condition.

NOTE: PTO – Refers to a San Joaquin Valley Air Pollution Control District Permit to Operate Condition.

NOTE: The information provided as "number of hours of excess emissions due to start-up/shutdown" represents only the excess of the steady state operation emission rate in AQ-18 and is exempt during a start-up condition per District Rule 4703, and the facility continues to comply with all start-up/shutdown emission limits in AQ-45 and PTO Conditions 32.

NOTE: *See Section 6 Deviation Report CC-2273 (1hr) .

*2 of these hours were caused by a Primary Reignition did not exceed the 15ppm limit.

Energy Commission Quarterly Air Report Compliance Confirmation

UNIT C

1st Quarter 2025
March 31, 2025

Condition of Certification	Description	Limit	Discussion of Compliance	Documentation
AQ - 18	Routine operation emission limits	Nox - 17.66 lb/hr CO - 54.91 lb/ hr	Hours Excess Nox - ONE* Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
PTO - 20	Routine operation emission limits	Nox - 0.018 lb/ Mmbtu CO - 0.057 lb/ Mmbtu Ammonia 10ppm	Hours Excess Nox - THREE* Hours Excess CO - ZERO Hours Excess Ammonia - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
PTO - 21	Routine operation emission limits	Nox - 5.0 ppm CO - 25ppm	Hours Excess Nox - THREE* Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
PTO -79 PTO -77	Routine operation emission limits Loads > 75%	Nox - 25.0 ppm or 85 lb/hr; averaged over 3 hours CO - 52.0 ppm or 94 lb/hr; averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
AQ - 21	CEMS Report Submission	Reports submitted Quarterly to SJVAPCD and Energy Commission	Quarterly Report (Also submitted to CARB and EPA)	Quarterly Report
AQ - 39	Steam Pit Emissions	Operation of steam pit shall not constitute a nuisance.	Provide, in Quarterly Report, any nuisance reports from the operation of the steam pit.	No Nuisance report received.
AQ - 44	Start-ups / Shutdowns	Start - up: 2 hours Shutdown: 2 hours	Start-ups/Shutdowns notated in margins of CEMS reports	Quarterly Report Section 5 CEMS Report
AQ - 45	Start-up or shutdown emission limits	Nox - 140 lb/hr; 2 hour avg. CO - 94 lb/hr; 2 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
PTO -79	Start-up or shutdown emission limits (loads < 35 %)	Nox - 85 lb/hr; 3 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
PTO -77	Start - up or shutdown emission limits (loads < 35%)	CO - 94 lb/hr; 3 hour avg.	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
AQ - 46	Reduced loads	Load reduced $\leq$ one hour in order to change the position of the exhaust gas diverter gate.	Reduced load periods are notated in the margins of CEMS reports	Quarterly Report Section 5, Unit C CEMS Reports
AQ - 47	Reduced load emission limits	Nox - 140 lb/hr CO - 94 lb/hr	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
PTO -79 PTO -77	Reduced load emission limits (loads < 35%)	Nox - 85 lb/hr; averaged over 3 hours CO - 94 lb/hr averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports

Energy Commission Quarterly Air Report Compliance Confirmation

UNIT C

1st Quarter 2025
March 31, 2025

Condition of Certification	Description	Limit	Discussion of Compliance	Documentation
PTO -79 PTO -77	Reduced load emission limits (loads $\geq$ 35% and < 75%)	Nox - 42.0 ppm or 85 lb/hr; averaged over 3 hours CO - 62.0 ppm or 94 lb/hr averaged over 3 hours	Hours Excess Nox - ZERO Hours Excess CO - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
AQ - 48	Emission of unreacted ammonia slip	10 ppm @ 15% O ₂ averaged over 24 hours	Hours of Excess NH ₃ slip - ZERO	Quarterly Report Section 5, Unit C CEMS Reports
AQ -49	Calibration drift (CD) of CEMS	Recalibrate whenever daily zero or high-level exceeds 5% for 5 consecutive days or 10% during any CD check the analyzer is deemed out-of-control. If out-of-control, MSCC is to take appropriate corrective action and repeat the CD check.	Report CD checks for each day as part of the quarterly report. Calibration reports are available by request.	PTO 83 allows MSCC to record the monitoring device calibration checks in a permanent form suitable for inspection. The file is to be retained for five years following the date of such measurements.
AQ - 52	Exhaust gas temperature at SCR	When SCR is operated, MSCC shall monitor and record the exhaust gas temperature at the SCR.	Quarterly Report	Quarterly Report Section 5, Unit C CEMS Reports
AQ - 53	Ammonia injection	When SCR is operated, ammonia shall be injected whenever the SCR catalyst exceeds the manufacturer's minimum ammonia injection temperature.	Quarterly Report	Quarterly Report Section 5, Unit C CEMS Reports
AQ - 55	Annual Fuel Consumption	Not Exceed >1,617 MMscf	Quarterly Report	Quarterly Report Section 5, Unit C Fuel Report
AQ - 56	Start - up, shutdown, or reduced load	Nox - 5.0 ppm CO - 25.0 ppm Dry@15%O ₂	Quarterly Report	Quarterly Report Section 5, Unit C CEMS Reports

NOTE: AQ – Refers to a California Energy Commission Air Quality Condition.

NOTE: PTO – Refers to a San Joaquin Valley Air Pollution Control District Permit to Operate Condition.

NOTE: The information provided as “number of hours of excess emissions due to start-up/shutdown” represents only the excess of the steady state operation emission rate in AQ-18 and is exempt during a start-up condition per District Rule 4703, and the facility continues to comply with all start-up/shutdown emission limits in AQ-45 and PTO Conditions 33.

NOTE: *See Section 6 Variance S-25-04S Summary Report CC-2270 Rev.1 & Deviation Report CC-2269 Rev.1 (3hrs)

**BEFORE THE HEARING BOARD
OF THE
SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT
SOUTHERN REGION
STATE OF CALIFORNIA**

In the matter of:	)	DOCKET No. S-25-04S
Aera Energy LLC	)	
Midway Sunset Cogeneration Company	)	
PO Box 11164	)	
Bakersfield, CA 93389	)	
	)	ORDER GRANTING
	)	A SHORT VARIANCE
For a variance from:	)	
2070 – <i>Standards for Granting Applications</i>	)	
2080 – <i>Conditional Approval</i>	)	
2201 – <i>New and Modified Stationary Source</i>	)	
<i>Review Rule</i>	)	
2520 – <i>Federally Mandated Operating Permits</i>	)	
4703 – <i>Stationary Gas Turbines</i>	)	
	)	
District Permit Numbers:	)	Granted on: February 12, 2025
See Conclusions and Order	)	
	)	Effective from: February 1, 2025
EPA AIRS Number:	)	
06-029-S1135	)	Effective to: March 31, 2025

On January 21, 2025, Aera Energy LLC (AERA)/Midway Sunset Cogeneration Company filed with the Southern Region Hearing Board a petition for a short variance. An interim variance was not required. Notice of the short variance petition and the hearing were given for at least 10 days prior to the hearing. MSCC requested that the Hearing Board grant a short variance from San Joaquin Valley Air Pollution Control District (District) Rules 2070, 2080, 2201, 2520, and 4703.

On February 12, 2025, a hearing on the petition for a short variance was held. Sam Parks and Greg Jans represented AERA, while Shannon Moore represented the District. All persons, including the public, were given the opportunity to give testimony or make comment.

The Hearing Board declared the hearing closed after receiving testimony and took the matter under submission for the decision. The Hearing Board made the following findings of fact.

LOCATION AND EQUIPMENT

1. MSCC is a combined heat and power facility located at 3566 West Crocker Springs Road, Fellows, California, 93224.
2. The subject equipment consists of combustion turbine engine Unit A (S-1135-224) and Unit C (S-1135-226).
3. The operation of the subject equipment is authorized by duly issued District Permits.

Petitioner Aera Energy LLC
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Date February 12, 2025
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BACKGROUND

Aera Energy, LLC (AERA), doing business as Midway Sunset Cogeneration Company (MSCC), operates a cogeneration facility to produce electricity and steam used in AERA's thermally enhanced oil recovery operations. The cogeneration facility is comprised of three gas combustion turbine engines under permits S-1135-224 (Unit A), -225 (Unit B), and -226 (Unit C). The subject equipment for this petition is Units A and C.

Due to declining steam demands and increasing demand for electricity production, AERA modified the permits to allow operation of the combustion turbines in simple cycle mode as peaker plants. In order to meet the permitted NOx emissions limit while operating as peaker plants, AERA installed the DLN-1+ Turndown Enhanced combustion system into Units A and C. Due to the design change of the new combustion system, AERA needs to test and tune the turbines to ensure the new components will reliably operate within permitted limits. The turbine manufacturer, General Electric, has recommended a 6-day commissioning period to test and tune the new combustion systems. Each unit will require a 6-day testing period and during this period NOx and CO emissions are expected to exceed the permitted limits. Therefore, AERA has requested a short variance for 12 non-consecutive days.

RULE REQUIREMENTS

1. The equipment subject to this variance is regulated by the following District Rules:
 - A. 2070 – *Standards for Granting Applications*
 - B. 2080 – *Conditional Approval*
 - C. 2201 – *New and Modified Stationary Source Review Rule*
 - D. 2520 – *Federally Mandated Operating Permits*
 - E. 4703 – *Stationary Gas Turbines*
2. District Rules 2070, 2080 and 2520 require that the subject equipment be operated in compliance with all conditions of the applicable permits. District Rules 2201 and 4703 require that the subject equipment operate within established emissions limits.

FINDINGS OF FACT

Pursuant to California Health & Safety Code § 42352, the following findings have been made:

1. ***That the petitioner for a variance is, or will be, in violation of Section 41701 or of any rule, regulation, or order of the District.***

The Hearing Board finds that the operation of combustion turbine Units A & C with excess NOx and CO emissions during testing and tuning of the new combustion systems will result in a violation of applicable requirements of District rules 2070, 2080, 2201, 2520, and 4703, in addition to the applicable conditions of the subject permits.

2. ***That, due to conditions beyond the reasonable control of the petitioner, requiring compliance would result in either (1) an arbitrary or unreasonable taking of property, or (2) the practical closing and elimination of a lawful business.***

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Date February 12, 2025
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The Hearing Board finds that the District granted AERA an Authority to Construct to install the DLN-1+ Turndown Enhanced combustion system into Units A and C. In order to ensure the units operate in a safe and reliable manner that is compliant with emissions limits, the units must be tested and tuned. It would be unreasonable to grant AERA permits to operate and not allow them to test and tune the units to ensure compliant operation. Failure to properly test and tune the upgraded combustion system could result in unsafe operation, damage to the turbine, and/or failure to meet contractual obligations to provide power if the turbine cannot operate in peaker mode.

3. *That the closing or taking would be without a corresponding benefit in reducing air contaminants.*

The Hearing Board finds that a closing or taking would be without a corresponding benefit in reducing air contaminants since the units are only called into service to meet peak electrical demand. Preventing AERA from conducting the necessary tests to ensure safe reliable operation would result in a disruption of contractual obligations to provide electrical power and could endanger personnel and equipment.

4. *That the applicant for the variance has given consideration to curtailing operations of the source in lieu of obtaining a variance.*

The Hearing Board finds that AERA has given consideration to curtailing operations. However, the units must be operated at various loads during the testing/commissioning period in order to demonstrate reliable operation for CAISO.

5. *During the period the variance is in effect, that the applicant will reduce excess emissions to the maximum extent feasible.*

The Hearing Board finds that emissions will be mitigated by turbine downtime on most days of testing and commissioning.

6. *During the period the variance is in effect, that the applicant will monitor or otherwise quantify emission levels from the source, if requested to do so by the District, and report these emissions levels to the District pursuant to a schedule established by the District.*

The Hearing Board finds that AERA will continue to operate their continuous emissions monitoring system (CEMS) throughout the variance period to monitor emissions. This data is constantly reported to the District through an electronic data polling system. In addition, AERA will quantify the amount of excess emissions, using actual data from the CEMS in conjunction with fuel usage records, and will report those to the District at the conclusion of the variance.

GENERAL COMMENTS

The Hearing Board also finds that a nuisance as defined in District Rule 4102 is not expected to occur as a result of this variance. Nor would continued operations likely create an immediate threat or hazard to public health or safety.

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It should be noted that the US Environmental Protection Agency (EPA), which monitors major sources, might not recognize this variance. AERA should be aware that the EPA could take enforcement action on this matter if it deems such action is appropriate.

CONCLUSIONS AND ORDER

NOW, THEREFORE, the SOUTHERN REGION HEARING BOARD ORDERS that a short variance be granted to MSCC, subject to the following conditions:

1. The variance shall be effective for 12 non-consecutive days between February 1, 2025, and March 31, 2025, inclusive, or until testing of combustion turbine Units A & C is completed and the units are returned to compliant operation, whichever occurs first.
2. Variance relief shall be granted from the applicable requirements of District Rules 2070, 2080, 2201, 2520, and 4703, in addition to the following permits and conditions:
 - A. S-1135-0-4 Condition 5
 - B. S-1135-224-30 Conditions 20, 21, 31, 70
 - C. S-1135-226-28 Conditions 20, 22, 31, 71
3. The variance shall allow AERA to operate combustion turbine units A & C with excess NOx and CO emissions while testing the units during commissioning.
4. Excess CO emissions shall not exceed **224 pounds** over the duration of the variance period.
5. Excess NOx emissions shall not exceed **2,962 pounds** over the duration of the variance period.
6. Should the total excess NOx emissions exceed one ton (2000 pounds), AERA shall pay three dollars and seventy-five cents (\$3.75) for each pound of total excess NOx emissions. Payment of the excess emission fee shall occur within 30 days after the end of the variance. Payment shall be made to the District and shall be directed to the "*Miscellaneous Incentive Grant – Hearing Board*," account
7. A Federal Title V deviation report shall be submitted to the District within 10 days of discovery each time a Federal Title V permit condition is violated. The deviation report must be sent to the facility inspector.
8. Should the facility experience operational conditions likely to cause a public nuisance, AERA shall cease the operations causing the problems and take all necessary actions to abate the problem immediately.
9. By April 15, 2025, or no later than 15 calendar days after completing the commissioning of each unit (A & C), AERA shall submit a summary report to the District. If the report due date should fall on a day the District is closed, it shall be due the next business day. The report shall include the following:
 - A. A detailed summary of the work conducted during the variance period,
 - B. The date(s), time(s), and total duration of the testing procedure for each unit,

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- C. A calculation of total excess emissions, and
- D. The required certification of truth, accuracy, and completeness, signed by the designated official of the limited liability company, as required by sections 9.13.1 and 10.0 of District Rule 2520 – *Federally Mandated Operating Permits*.

10. The end of variance summary report shall be submitted to the attention of:

Shannon Moore
SJVAPCD, Compliance Department
1990 East Gettysburg Avenue
Fresno, CA 93726
Telephone: (559) 230-5999
E-mail: shannon.moore@valleyair.org

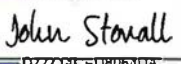
11. Failure to comply with any condition of this variance may render the variance null and void with the possibility of enforcement action taken that may include monetary penalties.

MOTION: Weber

SECOND: Moeller

Ayes: Dunn, Moeller, Stovall, Weber, Penner
Noes: None
Abstained: None
Recused: None
Absent: None

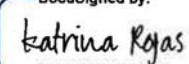
THE FOREGOING DECISION IS APPROVED:

DocuSigned by:

John Stovall, Chair
Hearing Board – Southern Region
San Joaquin Valley APCD

2/20/2025

Date

ATTEST:

DocuSigned by:

Katrina Rojas, Deputy Clerk to the Boards

2/20/2025

Date



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

PROOF OF SERVICE

I, Sandy Watkins, declare:

I am a resident of the State of California and over the age of 18 years, and not a party to the within action; my business address is San Joaquin Valley Air Pollution Control District, 1990 E. Gettysburg, Fresno, California 93726.

On March 12, 2025, I served the within documents:

ORDER GRANTING A VARIANCE – DOCKET No. S-25-04S

☒ by placing the document(s) listed above in a sealed envelope, and placing the same for mailing in the United States mail at Fresno, California, in accordance with the company's ordinary practices, and addressed as set forth below.

☒ based on an agreement of the parties with email addresses below, to accept service by transmitting via email the above listed document(s) to the email addresses set forth below on this date before 5 p.m.

by personally delivering the document(s) listed above to the person(s) at the address(s) set forth below:

Greg Jans
Aera Energy LLC / MSCC
P. O. Box 457
Fellows, CA 93224
gjans@midwaysunset.com

Roshni Brahmabhatt
USEPA Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
AEO_R9@epa.gov

CARB – Enforcement Division
PO Box 2815
Sacramento, CA 95814
variance@arb.ca.gov

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

Executed on March 12, 2025, at Fresno, California.


Sandy Watkins
Office Assistant II

Northern Region Office
4800 Enterprise Way
Modesto, CA 95356-8718
(209) 557-6400 ♦ FAX (209) 557-6475

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 ♦ FAX (559) 230-6062
www.valleyair.org

Southern Region Office
34946 Flyover Court
Bakersfield, CA 93308-9725
(661) 392-5500 ♦ FAX (661) 392-5585



San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-226-28

EXPIRATION DATE: 05/31/2026

SECTION: 17 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

78.2 MW COGENERATION UNIT C WITH GE MODEL G7111E FRAME 7E GAS TURBINE ENGINE WITH DRY LOW NOX COMBUSTORS (DLN1+ TURNDOWN ENHANCE), SELECTIVE CATALYTIC REDUCTION (SCR), AND UNFIRED HEAT RECOVERY STEAM GENERATOR (HRSG)

PERMIT UNIT REQUIREMENTS

1. CTG exhaust after the SCR unit shall be equipped with continuously recording emissions monitors dedicated to this unit for NO_x, CO, and O₂. Continuous emissions monitors shall meet the requirements of 40 CFR Part 60, Appendices B and F, and 40 CFR Part 75, and shall be capable of monitoring emissions during startups and shutdowns as well as normal operating conditions. If relative accuracy of CEM(s) cannot be demonstrated during startup conditions, CEM results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
2. CTG shall be equipped with a continuously recording emission monitor preceding the SCR module measuring NO_x concentration for the purposes of calculating ammonia slip. Permittee shall check, record, and quantify the calibration drift (CD) at two concentration values at least once daily (approximately 24 hours) when SCR is operated. The calibration shall be adjusted whenever the daily zero or high-level CD exceeds 5%. If either the zero or high-level CD exceeds 5% for five consecutive daily periods, the analyzer shall be deemed out-of-control. If either the zero or high-level CD exceeds 10% during any CD check, analyzer shall be deemed out-of-control. If the analyzer is out-of-control, the permittee shall take appropriate corrective action and then repeat the CD check. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
3. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Heat recovery steam generator design shall provide space for additional selective catalytic reduction catalyst and oxidation catalyst if required to meet NO_x and CO emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
5. When SCR is operated, permittee shall monitor and record exhaust gas temperature at selective catalytic reduction and oxidation catalyst inlets. [District Rule 2201] Federally Enforceable Through Title V Permit
6. When SCR is operated, ammonia shall be injected whenever the selective catalytic reduction system catalyst temperature exceeds the minimum ammonia injection temperature recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas turbine engine shall be equipped with fuel consumption monitor recorder accurate to +/- 3%. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CEM for NO_x (as NO₂) and CO shall conform to Rule 1080 specifications. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
9. HRSG exhaust stack shall be equipped with permanent stack sampling provisions adequate to facilitate testing consistent with EPA test methods. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



10. Flue gas ducting from engine to HRSG shall have no provisions for introduction of dilution air. [District Rule 1110] Federally Enforceable Through Title V Permit
11. Lube oil cooler/accumulation vent shall be equipped with control device(s) approved by the APCO sufficient to prevent emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Lube oil cooler/accumulator vent(s) shall not have detectable emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Natural gas sulfur content shall not exceed 0.31 gr/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. All CEM's shall be calibrated and operated according to EPA guidelines as specified in 40 CFR 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
15. Quarterly CEM reports shall be submitted to the APCO according to EPA regulations as specified in 40 CFR 60 Appendix B. [District Rule 4001 and District rule 1080, 8.0] Federally Enforceable Through Title V Permit
16. Audits of all monitors shall be conducted by independent laboratory in accordance with EPA guidelines and witnessed by District. Reports shall be submitted to District within 60 days of audits. [District Rule 1080] Federally Enforceable Through Title V Permit
17. All notification, recordkeeping, performance tests, reporting requirements, and compliance testing requirements of Rule 4001 NSPS shall be satisfied. [District Rule 4001] Federally Enforceable Through Title V Permit
18. Operational records including fuel type, fuel characteristics, and consumption shall be maintained and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
19. Accurate records of NO_x (as NO₂) and CO flue gas concentration corrected to 15% O₂ and fuel gas sulfur content shall be maintained and shall be reported as described in Rule 1080 upon request. [District Rule 1080] Federally Enforceable Through Title V Permit
20. Emission rates shall not exceed the following: PM₁₀: 0.010 lb/MMBtu, SO_x (as SO₂): 0.001 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu, VOC: 0.009 lb/MMBtu, CO: 0.057 lb/MMBtu, and ammonia - 10 ppmvd @ 15%O₂. [District NSR Rule; District Rule 4201; and Kern County Rule 404] Federally Enforceable Through Title V Permit
21. Annual fuel consumption shall not exceed 1,617 MMscf on a twelve-consecutive month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Permittee shall comply with the following emission limit at all times except during periods of start-up, shutdown, or reduced load: NO_x (as NO₂): 5.0 ppmv, and CO: 25 ppmv, dry @ 15% O₂ corrected to ISO conditions. [40 CFR 60.332(a)(1) & 60.332(a)(2) and District Rule 4703] Federally Enforceable Through Title V Permit
23. Gas turbine engine start-up is that period of time not exceeding two hours in duration during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
24. Gas turbine engine shutdown is that period of time not exceeding two hours in duration during which the unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
25. Gas turbine reduced load period is that period not exceeding one hour in duration during which the unit is operated at less than rated capacity in order to change the position of the exhaust gas diverter gate. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

26. Compliance with NO_x and CO emission limits shall be demonstrated by District-witnessed sample collection by independent testing laboratory on an annual basis. Compliance with NO_x, CO and ammonia emissions limits shall be demonstrated by District-witnessed sample collection by independent testing laboratory within 60 days of any use of the SCR system, unless compliance with emissions limitations has been demonstrated with the SCR system in operation within the preceding 12 month period. [District Rule 4703 and 1081] Federally Enforceable Through Title V Permit
27. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The following test methods shall be used PM₁₀: EPA method 5 (front half and back half), NO_x: EPA Method 7E or 20, CO: EPA method 10 (or 10B) or CARB Method 100, O₂: EPA Method 3, 3A, or 20, VOC: EPA method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081, 40 CFR 60.335 (b), and District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
29. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O₂ = $((a - (b \times c / 1,000,000)) \times 1,000,000 / b) \times d$, where a = ammonia injection rate (lb/hr) / 17 (lb/lb. mol), b = dry exhaust gas flow rate (lb/hr) / (29 (lb/lb. mol)), c = change in measured NO_x concentration ppmv at 15% O₂ across catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip. [District Rule 4102] Federally Enforceable Through Title V Permit
30. Official test results and field data shall be submitted within 60 days after collection. [District Rule 4703 and District Rule 1081] Federally Enforceable Through Title V Permit
31. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4703] Federally Enforceable Through Title V Permit
32. CEC emission rates, except during periods of startup, shutdown, or reduced load shall not exceed PM₁₀: 9.98 lb/hr, SO_x (as SO₂): 0.92 lb/hr, NO_x (as NO₂): 17.66 lb/hr, VOC: 9.00 lb/hr, and CO: 54.91 lb/hr. [District Rules 2080 and 4703, and 40 CFR 60] Federally Enforceable Through Title V Permit
33. For CEC purposes, emissions during periods of startup and shutdown shall not exceed the following values average over 2 hours: NO_x: 140 lb/hr, and CO: 94 lb/hr. [District Rule 2080] Federally Enforceable Through Title V Permit
34. The CEC shall be notified of any changes to the combined annual emission limits for cogeneration units S-1135-224, -225, and -226, only to the extent to be informed of their impact on the Midway-Sunset Cogeneration Facility. [District Rule 2080] Federally Enforceable Through Title V Permit
35. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [Kern County Rule 108 and District Rule 1080] Federally Enforceable Through Title V Permit
36. Records shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEM's that have been installed pursuant to District Rule 1080, and emission measurements. [Kern County Rule 108; District Rules 1080 and 4703; 40 CFR 60.7 (b)] Federally Enforceable Through Title V Permit
37. The permittee shall maintain hourly average records of NO_x and CO emissions. Compliance with the hourly, daily, and twelve month rolling average VOC emission limits shall be demonstrated by the CO CEM data and the VOC/CO relationship determined by annual CO and VOC source tests of NO_x, CO, and ammonia emission concentrations (ppmv @ 15% O₂), and hourly, daily, and twelve month rolling. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
38. A violation of NO_x emission standards indicated by the NO_x CEM shall be reported by the operator to the APCO within 96 hours. [Kern County Rule 108 and District Rule 1080, 9.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

39. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the APCO of the intent to shut down the CEM at least 24 hours prior to the event. [Kern County Rule 108 and District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
40. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit
41. Unit shall be fired on a natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333 (a) & (b); 40 CFR 60.334 (c)(2); Kern County Rule 407; and District Rule 4801] Federally Enforceable Through Title V Permit
42. If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
43. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using method(s) specified on this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
44. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246, or double GC for H2S and mercaptans. [40 CFR 60.335 (d)] Federally Enforceable Through Title V Permit
45. If the turbine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334 (b)(2)] Federally Enforceable Through Title V Permit
46. Operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(a)(2)] Federally Enforceable Through Title V Permit
47. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, OR ASTM 1945. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
48. The operator shall provide source test information annually regarding the exhaust gas NOx concentration corrected to 15% O2 (dry). [40 CFR 60.332 (a),(b) and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
49. Results of continuous emission monitoring must be averaged in accordance with the requirements of 40 CFR 60.13. [40 CFR 60.334 (a),(b),(c) and District Rule 4703, 5.0] Federally Enforceable Through Title V Permit
50. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [40 CFR 60.332 (a),(b) and District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit
51. This unit is a simple combustion turbine as defined in 40 CFR 72.6 (b)(1) and shall not be subject to the requirements of 40 CFR Part 72. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
52. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Kern County Rules 404, 108, and 108.1. A permit shield is granted from these requirements. [SJVUAPCD Rule 2520, 13.2] Federally Enforceable Through Title V Permit
53. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: Kern County Rule 407; District Rules 4801, 4201, 1081, and 1080, Sections 6.5, 7.2, 8.0, 9.0, and 10.0; 40 CFR 60.332 (c) and (d); 60.334 (b), (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
54. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: District Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

55. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: District Rules 1080, 7.3 and 4703, 6.2.2; 40 CFR 60.332(a), (b); 60.333(a) and (b), 60.334(a), (b), and (c)(1); 60.335(a), (b) and (c)(2). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
56. All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
57. The Permittee (MSCC) must notify EPA by telephone, facsimile, or electronic mail transmission within two (2) working days following the discovery of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner, which results in an increase in emissions above any allowable emission limit stated in any conditions where PSD is cited as the basis of the condition. In addition, the Permittee (MSCC) must notify EPA in writing within fifteen (15) days of any such failure. The notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in any conditions where PSD is cited as the basis of the condition, and the methods utilized to mitigate emissions and restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violation of this permit or of any law or regulation that such malfunction may cause, except as provided for in the conditions where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
58. A malfunction means a sudden and unavoidable breakdown of equipment or of a process beyond the reasonable control of the source. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
59. Emissions in excess of the limits specified in any conditions where PSD is cited as the basis of the condition shall constitute a violation of this permit and may be the subject of enforcement proceedings. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
60. Affirmative defense: In the context of an enforcement proceeding, emissions which are below the limits set forth in any condition where PSD is cited as the basis of the condition shall not be subject to penalty if the Permittee (MSCC) retains properly signed, contemporaneous operating logs or other relevant evidence and can demonstrate all of the following: i.) A malfunction caused the emissions in excess of the limits in any condition where PSD is cited as the basis of the condition; ii.) The permitted facility, including the air pollution control equipment and process equipment, was being properly operated at the time of the malfunction; iii.) Preventative maintenance was regularly performed in a manner consistent with good practice for minimizing emissions; iv.) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; v.) During the period of the malfunction, the permittee (MSCC) took all reasonable steps to minimize the amount and duration of emissions (including any bypass) that exceeded the emission limits provided in any condition where PSD is cited as the basis of the condition. Reasonable steps to minimize emissions could include, but are not limited to, reducing production to the lowest level practicable, reducing the material feed that results in the increased emissions, and switching to alternative, less polluting fuels. Where repairs were required, repairs were made in an expeditious fashion when the operator knew or should have known that applicable emission limitations were being exceeded. Off-shift labor and overtime must have been utilized, to the extent practicable, to ensure that such repairs were made as expeditiously as possible; and vi.) The permittee (MSCC) complied with the malfunction reporting requirements as specified in the condition where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
61. All emissions, including those associated with a malfunction which may be eligible for an affirmative defense, must be included in all emissions calculations and demonstrations of compliance with mass emission limits (e.g., daily, monthly, and annual emission limits) specified in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
62. This provision is in addition to any emergency or malfunction provision contained in any applicable requirement or elsewhere in this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

63. The EPA Regional Administrator, and/or their authorized representative, upon the presentation of credential, must be permitted: (1) to enter the premises where the source is located or where any records are required to be kept under the terms and conditions of the PSD permit SJ-87-01; and (2) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of PSD permit SJ 87-01; and (3) to inspect any equipment, operation, or method required in the PSD permit SJ-87-01; and (4) to sample emissions from source(s). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
64. In the event of any changes in control or ownership of facilities to be constructed or modified, this permit shall be binding on all subsequent owners and operators. The Permittee (MSCC) shall notify the succeeding owner and operator of the existence of the PSD permit SJ-87-01 and its conditions by letter, a copy of which shall be forwarded to the EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
65. The provisions of the PSD permit SJ-87-01 are severable, and , if any provisions of the permit is held invalid, the remainder of the permit must not be affected thereby. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
66. The permittee (MSCC) must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, 62, and 63 and all other applicable Federal, State, and local air quality regulations. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
67. On or before the date of startup (as defined in 40 C.F.R. 60.2) of the Western Midway Sunset Cogeneration Project (WMSCP; PSD Permit No. SJ-00-01) and thereafter the Permittee (MSCC) must install, continuously operate, and maintain the Dry Low NOx (DLN) combustion systems to reduce NOx emissions from each of its three turbines. The Permittee (MSCC) shall also use proper combustion techniques for the control of CO emissions from the equipment at MSCP. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
68. Within 60 days after achieving the base load, but no later than 180 days after initial startup of all three modified turbines (as defined in 40 C.F.R. 60.2), and annually thereafter (at about the anniversary of the initial performance test), the Permittee (MSCC) must conduct performance tests (as described in 40 C.F.R. 60.8) for NOx, and CO on the exhaust stack gases. The Permittee (MSCC) must furnish the District, the California Air Resources Board (CARB), and the EPA a written report of the results of such tests. Upon written request from the Permittee (MSCC), and adequate justification, EPA may waive a specific annual test and/or allow for testing to be done at less than maximum operating capacity. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
69. Performance tests for the emissions of NOx, and CO must be conducted and the results reported in accordance with the test methods set forth in 40 C.F.R. 60.8 and 40 C.F.R. 60, Appendix A. The following test methods must be used: a.) Performance tests for the emissions of NOx must be conducted using EPA Method 1-4 and 7E. b.) Performance tests for the emissions of CO must be conducted using the EPA Methods 1-4 and 10. In lieu of the above-mentioned test methods, equivalent methods may be used with prior written approval from EPA. The Permittee (MSCC) must notify EPA in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. [PSD SJ 87-01] Federally Enforceable Through Title V Permit
70. For performance test purposes, sampling ports, platforms, and access must be provided by the Permittee on the emission unit exhaust system in accordance with 40 C.F.R. 60.8(e). [PSD SJ 87-01] Federally Enforceable Through Title V Permit
71. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of CO into the atmosphere in excess of the following emission limits per turbine: The more stringent of 25 ppmvd @ 15% O2 or 55 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
72. This condition applies prior to the startup of the WMSCP: On and after the date of start up any of the three turbines at MSCP must not discharge (per turbine, and based on 3-hour rolling average) into the atmosphere CO in excess of the following of any of: 1.) The more stringent of 52.0 ppmvd @ 15% O2 or 94 pounds for loads greater than or equal to 75%. 2.) The more stringent of 62.0 ppmvd @ 15% O2 or 94 pounds for loads greater than or equal to 35% but less than 75%. 3.) 94 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

73. On and after the date of startup of the WMSCP (PSD Permit No. SJ-00-01), the Permittee (MSCC) must not discharge or cause the discharge of NO_x into the atmosphere in excess of the following emission limits per turbine: The more stringent of 10 ppmvd @ 15% O₂ or 36.1 pounds per hour, based on 3-hour rolling average. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
74. This condition applies prior to the startup of the WMSCP: On and after the date of start-up of any of the three turbines, MSCC must not discharge (per turbine, based on 3-hour rolling average) into the atmosphere NO_x (as NO₂) in excess of the following: 1.) The more stringent of 25.0 ppmvd @ 15% O₂ or 85.0 pounds per hour for loads greater than or equal to 75%; 2.) The more stringent of 42.0 ppmvd @ 15% O₂ or 85 pounds per hour for loads greater than or equal to 35% but less than 75%; 3.) 85 pounds per hour for loads less than 35%. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
75. The hourly (3-hour averaging) emissions must not exceed: 1.) 94 pounds of CO and 85 pounds of NO_x; 2.) All CEMs must be operating during startups and shut downs; 3.) The time, date and duration of each startup and shutdown event must be recorded. The records must include the lbs/hour calculations based on the CEM data. These records must be kept for five years following the date of such events. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
76. Prior to the date of startup and thereafter, the Permittee (MSCC) must install, maintain and operate the following continuous monitoring systems (CEMs) in the exhaust stacks: a.) Continuous monitoring systems to measure stack gas NO_x, CO and O₂ concentrations. The systems must meet EPA monitoring performance specification (40 C.F.R. 60.13 and 40 C.F.R. 60, Appendix B, Performance Specifications 2, 3 and 4); b.) A continuous monitoring system to measure stack gas and natural gas volumetric flow rates. The stack gas flow measurement system must meet EPA Performance Specifications for (40 C.F.R. Part 52, Appendix E). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
77. The Permittee (MSCC) must maintain a file of all measurements, including continuous monitoring systems evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; performance and all other information required by 40 C.F.R. 60 Appendices A-B recorded in a permanent form suitable for inspection. The file must be retained for five years following the date of such measurements, maintenance, reports and records. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
78. The Permittee (MSCC) must notify EPA of the date on which demonstration for the continuous monitoring system performance commences (40 C.F.R. 60.13). This date must be no later than 60 days after full load operation but not later than 180 days after startup. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
79. The Permittee (MSCC) must submit a written report of all excess emissions to EPA for every calendar quarter. The quarterly report must include the following: a.) The magnitude of the excess emissions computed in accordance with 40 C.F.R. 60.13(h), any conversion factors used, and the date and time of commencement and compilation of each time period of excess emissions; b.) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of any equipment. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted must also be reported; c.) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments; d.) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information must be stated in the report; and e.) Excess emissions must be defined as any 3-hour period during which the average emissions of CO, as measured by the CEM exceeds the maximum emission limits set forth in the condition with a CO emission limit, where PSD is cited as the basis of the condition or any 3-hour period during which the average emissions of NO_x exceed the maximum emission limits set forth in the condition with a NO_x emission limit, where PSD is cited as the basis of the condition. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
80. Excess emissions indicated by the CEM system must be considered violations of the applicable emission limit for the purpose of this permit. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
81. The quality assurance project plan used by the Permittee (MSCC) for the certification and operation of the continuous emissions monitors, which meets the requirements of 40 C.F.R. Part 60, Appendix F, must be available upon request to EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

82. The Permittee (MSCC) must keep a monthly record of all fuel uses. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
83. The proposed power plant is subject to the federal regulations entitled Standards of Performance for New Stationary Sources (40 C.F.R. 60). The owner or operator must meet all applicable requirements of 40 C.F.R. 60 Subparts A and GG of this regulation. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
84. All three turbines will fire natural gas only. The Permittee (MSCC) must only combust pipeline quality natural gas with sulfur content (as S) below 0.75 grains per 100 dry standard cubic feet (dscf). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
85. MSCC shall have legal and operational responsibility and control of all air pollutant emitting activities of the MSCP. This responsibility shall include, but shall not be limited to the following: 1.) Operating and maintaining the project to comply with all federal, state, and local air pollution laws, regulations, orders, and other requirements; 2.) Ensuring the emissions offsets, tradeoffs, or other emission reductions required for this project under permits issued by the U.S. EPA, the District, and/or the California Energy Commission are obtained as required; or 3.) Any violations of any air pollution requirements are the legal responsibility of MSCC, in addition to any other legal responsible entity. Any proposed change to this condition shall require prior written concurrence of the US EPA. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
86. The allowable incidental taking (killing, harming, or harassment) of San Joaquin kit foxes, blunt-nosed leopard lizards, and giant kangaroo rats is confined to the proposed cogeneration plant site one half mile radius around this site (on lands owned or leased by Aera Energy LLC), and associated subject cogeneration plant facilities (including pipelines, transmission lines, temporary equipment stockpiling areas, and access roads) as discussed in the project Application for Certification report (Sun Cogeneration Company and Southern Sierra Energy Company 1985). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
87. MSCC is required to implement the "Agreement on Conditions for Mitigation of the Biological Impacts of the Midway-Sunset Project" as required by the U.S. Fish and Wildlife Service (USFWS) (Memorandum dated March 16, 1987 from the USFWS to the US EPA). [PSD SJ-87-01] Federally Enforceable Through Title V Permit
88. Any endangered species found dead should be turned in to the California Department of Fish and Game for Analysis. MSCC must also report this event to the USFWS. The USFWS may recommend amendment to the existing project actions pending results of the analysis. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
89. All correspondence as required by this permit shall be forwarded to: 1.) Director, Air Division (Attn: Air-3) EPA Region IX 75 Hawthorne Street San Francisco, CA 94105-3901 Tel: (415) 744-1291 Fax: (415) 744-1076; 2.) Chief, Stationary Source Division, California Air Resource Board P.O. Box 2815 Sacramento, CA 95812; and 3.) Air Pollution Control Officer, San Joaquin Valley Unified APCD 34946 Flyover Court Bakersfield, CA 93308. [PSD SJ-87-01] Federally Enforceable Through Title V Permit
90. MSCC is the legal owner of the gas turbine cogeneration facility. MSCC is jointly owned by Sun Cogeneration Limited Partnership (Sun Cogen LP) and San Joaquin Energy Company. Sun Cogen LP is managed and controlled by a wholly owned subsidiary of Aera Energy LLC. (See Condition 104) [PSD SJ-87-01] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



March 05, 2025

CC-2266

Mr. Dave Born
Supervising Air Quality Inspector
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Subject: 2025 Annual Compliance and Relative Accuracy Test Protocols for Units A, B, & C.

Dear Mr. Born,

MSCC has scheduled Annual Compliance and Relative Accuracy Testing of Units A, B & C for April 8, 9 & 10, 2025.

Test Protocols for Unit A, B and C will be submitted to the District at least 15 days prior to testing, as required.

If you have any questions or comments, please contact Greg Jans at 661-768-3018 or Greg Davis at 661-768-3028.

I declare, under penalty of perjury under the laws of the state of California, that based on information and belief formed after reasonable inquiry, the information provided in this communication is true, accurate and complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Lowell Pollema".

Lowell Pollema
Executive Director

cc: File CC-2266
Library
G. Jans
A. Ali CEC
Director EPA
Chief CARB



March 19, 2025

CC-2274

Mr. Dave Born
Supervising Air Quality Inspector
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Subject: 2025 Annual Compliance and Relative Accuracy Testing Protocol for Units A, B and C.

Dear Mr. Born,

MSCC has scheduled Annual Compliance and Relative Accuracy Testing of Units A, B and C for April 8, 9 & 10, 2025.

Test Protocols for Units A, B and C are submitted with this letter to the District at least 15 days prior to testing, as required.

If you have any questions or comments, please contact Greg Jans at 661-768-3018 or Greg Davis at 661-768-3028.

I declare, under penalty of perjury under the laws of the state of California, that based on information and belief formed after reasonable inquiry, the information provided in this communication is true, accurate and complete.

Sincerely,

A handwritten signature in black ink that reads "Lowell Pollema".

Lowell Pollema
Executive Director

*Annual Compliance and Relative Accuracy Testing Protocol for Units A, B and C was submitted by Email.

cc: File CC-2274 (1 Hard Copy & CD Units A, B & C)
 Library (1 Hard Copy Units A, B & C)
 A. Ali CEC (Supplied on MSCC Portal for Retrieval)
 Director EPA (1 CD Units A, B & C)
 Chief CARB (1 CD Units A, B & C)
 G. Jans



CC: 2267

**SAN JOAQUIN VALLEY
Air Pollution Control District
TITLE V
DEVIATION REPORTING**

Company Name: Midway Sunset Cogeneration Company
Facility ID #: S-1135

DEVIATION

1. **Permit Unit and Condition #:**
S-1135-0-5: Condition #5
S-1135-224-30: Conditions 20, 21, 31, 55, 65
2. **Description of Permit Condition:**
Condition 5: The permittee must comply with all conditions of the permit.
Conditions 20, 21, 31: Permitted NOx limits of 0.018 lbs/MMBtu, 5.0 ppmv and 17.66 lbs/hr respectfully.
Condition 55: All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.
Condition 65: The permittee must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, and 63 and all other applicable Federal, State, and local air quality regulations.
3. **Date, time and duration of deviation:**
February 17, 2025; Unit A ran from 1333 hours to 2308 hours (standard time); 9 hours 35 minutes.
4. **Description of deviation: (Includes excess emissions if applicable)**
This deviation is covered by Short Variance S-25-04S allowing the excess NOx emissions during the tuning of Units A and C DLNI+TE combustion systems as long as the total NOx lbs/hr did not exceed 2,962 pounds and CO lbs/hr did not exceed 224 over the variance period. Unit A's excess NOx pounds emissions over this deviation period was 7.68 pounds. There were no excess CO emissions over this deviation period.
5. **Date and time when deviation was discovered:**
This deviation was preplanned and covered by Short Variance S-25-04S.
6. **Probable cause of deviation:**
The cause for the deviation was the requisite testing and tuning of Units A and C DLNI+TE combustion systems.
7. **Comments/corrective action taken:**

MSCC's DLNI+TE Unit A combustion system tuning continued on 2/18/25.

Condition 6 of Variance S-25-04S CONCLUSIONS AND ORDER requires that a Federal Title V deviation report be submitted each time a Federal Title V permit condition is violated.

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete:

Sincerely,



Lowell Pollama
Executive Director

February 26, 2025
661-768-3020

cc: File CC-2267
G. Jans
G. Davis
S. Urias
S. Parks (Aera)

Submitted using PAS Facility Portal;
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/17/2025 13:00 Through 02/17/2025 23:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/17/25	13:00	48.8 U	0.106 E	22.0	46.6 E	59.8 EU	0.105 E	26.9	28.3 E <i>54</i>
02/17/25	14:00	5.6 U	0.006	5.6	2.7	15.8 U	0.017	15.8	4.6 <i>54</i>
02/17/25	15:00	1.3	0.001	1.3	0.7	24.6 E <i>6.94</i>	0.026 E	24.6	7.1 E
02/17/25	16:00	2.7	0.003	2.7	1.3	14.5	0.016	14.5	4.2
02/17/25	17:00	1.6	0.002	1.6	0.7	18.4 E <i>.74</i>	0.020 E	18.4	5.3 E
02/17/25	18:00	4.6	0.005	4.8	2.2	14.8	0.016	14.8	4.2
02/17/25	19:00	7.9	0.009	7.9	3.8	14.1	0.016	14.1	4.2
02/17/25	20:00	9.1	0.010	9.1	4.3	14.9	0.016	14.9	4.3
02/17/25	21:00	10.3	0.012	10.3	5.4	13.8	0.016	13.8	4.4
02/17/25	22:00	27.2 D	0.039	27.2	17.2	11.8 D	0.016	11.8	4.4 <i>SD</i>
02/17/25	23:00	60.2 D	0.265 E	9.0	118.6 E	62.4 D	0.183 E	9.4	49.8 E <i>SD</i>

7.68 excess NOX lbs

Average	16.3	0.042	9.2	18.5	24.1	0.041	16.3	11.0
Minimum	1.3	0.001	1.3	0.7	11.8	0.016	9.4	4.2
Maximum	60.2	0.265	27.2	118.6	62.4	0.183	26.9	49.8
Summation	179.3	0.458	101.3	203.5	264.9	0.447	179.0	120.8
Geometric Mean	8.0	0.011	6.3	4.8	19.9	0.025	15.6	6.8
Included Data Points	11	11	11	11	11	11	11	11
Total number of Precedence	11	11	11	11	11	11	11	11

P = Unit Offline

C = Calibration

M = Maintenance

T = Out Of Control

*** = Suspect**

Report Generated: 02/18/25 19:47

Report Version 6.0

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete:

Sincerely,



Lowell Pollema
Executive Director

February 28, 2025
661-768-3020

cc: File CC-2267 Rev. I
G. Jans
G. Davis
S. Urias
S. Parks (Aera)

Submitted using PAS Facility Portal:
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/17/2025 13:00 Through 02/17/2025 23:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/17/25	13:00	48.8 U	0.108 E	22.0	46.6 E	59.8 EU	0.105 E	26.9	28.3 E
02/17/25	14:00	5.6 U	0.006	5.6	2.7	15.8 U	0.017	15.8	4.6
02/17/25	15:00	1.3	0.001	1.3	0.7	24.6 E 6.94	0.026 E	24.6	7.1 E
02/17/25	16:00	2.7	0.003	2.7	1.3	14.5	0.016	14.5	4.2
02/17/25	17:00	1.6	0.002	1.6	0.7	18.4 E .74	0.020 E	18.4	5.3 E
02/17/25	18:00	4.6	0.005	4.6	2.2	14.8	0.016	14.8	4.2
02/17/25	19:00	7.9	0.009	7.9	3.8	14.1	0.016	14.1	4.2
02/17/25	20:00	9.1	0.010	9.1	4.3	14.9	0.016	14.9	4.3
02/17/25	21:00	10.3	0.012	10.3	5.4	13.8	0.016	13.8	4.4
02/17/25	22:00	27.2 D	0.039	27.2	17.2	11.8 D	0.016	11.8	4.4
02/17/25	23:00	60.2 D	0.265 E	9.0	118.6 E	62.4 D	0.183 E	9.4	49.8 E

7.68 excess NOX lbs

Average	16.3	0.042	9.2	18.5	24.1	0.041	16.3	11.0
Minimum	1.3	0.001	1.3	0.7	11.8	0.016	9.4	4.2
Maximum	60.2	0.265	27.2	118.6	62.4	0.183	26.9	49.8
Summation	179.3	0.458	101.3	203.5	264.9	0.447	179.0	120.8
Geometric Mean	8.0	0.011	6.3	4.8	19.9	0.025	15.6	6.8
Included Data Points	11	11	11	11	11	11	11	11
Total number of Exceedance	11	11	11	11	11	11	11	11

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/18/25 19:47

Report Version 6.0



CC: 2268

**SAN JOAQUIN VALLEY
Air Pollution Control District
TITLE V
DEVIATION REPORTING**

Company Name: Midway Sunset Cogeneration Company
Facility ID #: S-1135

DEVIATION

1. Permit Unit and Condition #:

S-1135-0-5: Condition #5

S-1135-224-30: Conditions 20, 21, 31, 55, 65

2. Description of Permit Condition:

Condition 5: The permittee must comply with all conditions of the permit.

Conditions 20, 21, 31: Permitted NO_x limits of 0.018 lbs/MMBtu, 5.0 ppmv and 17.66 lbs/hr respectfully.

Condition 55: All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.

Condition 65: The permittee must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, and 63 and all other applicable Federal, State, and local air quality regulations.

3. Date, time and duration of deviation:

February 18, 2025; Unit A ran from 1333 hours to 1741 hours (standard time); 4 hours 8 minutes.

4. Description of deviation: (Includes excess emissions if applicable)

This deviation is covered by Short Variance S-25-04S allowing the excess NO_x emissions during the tuning of Units A and C DLN1+TE combustion systems as long as the total NO_x lbs/hr did not exceed 2,962 pounds and CO lbs/hr did not exceed 224 over the variance period. Unit A's excess NO_x pounds emissions over this deviation period was 0 pounds. There were no excess CO emissions over this deviation period. We did exceed our permitted Nox lbs/mmbtu limit for 1 hour.

5. Date and time when deviation was discovered:

This deviation was preplanned and covered by Short Variance S-25-04S.

6. Probable cause of deviation:

The cause for the deviation was the requisite testing and tuning of Units A and C DLN1+TE combustion systems.

7. Comments/corrective action taken:

MSCC's DLN1+TE Units A and C combustion systems were successfully tuned and Units A and C are able to operate within all permit limits.

Condition 6 of Variance S-25-04S CONCLUSIONS AND ORDER requires that a Federal Title V deviation report be submitted each time a Federal Title V permit condition is violated.

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete:

Sincerely,



Lowell Pollema
Executive Director

February 26, 2025
661-768-3020

cc: File CC-2268
G. Jans
G. Davis
S. Urias
S. Parks (Aera)

Submitted using PAS Facility Portal:
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 13:00 Through 02/18/2025 17:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/18/25	13:00	41.0 U	0.091 E	18.5	65.8 E	67.8 U	0.113 E	30.5	31.4 E
02/18/25	14:00	3.2 U	0.003	3.2	1.6	14.9 U	0.016	14.9	4.3
02/18/25	15:00	23.0	0.029	23.0	13.4	15.2	0.018 E	15.2	4.9
02/18/25	16:00	19.9 D	0.025	19.9	11.3	15.2 D	0.018 E	15.2	4.9
02/18/25	17:00	24.7 D	0.063 E	17.3	53.7 E	17.1 D	0.029 E	12.0	10.6 E
Average		22.4	0.042	16.4	29.2	26.0	0.039	17.6	11.2
Minimum		3.2	0.003	3.2	1.6	14.9	0.016	12.0	4.3
Maximum		41.0	0.091	23.0	65.8	67.8	0.113	30.5	31.4
Summation		111.8	0.211	81.9	145.8	130.2	0.194	87.8	56.1
Geometric Mean		17.1	0.026	13.6	15.4	20.9	0.028	16.6	8.1
Included Data Points		5	5	5	5	5	5	5	5
Total number of Data Points		5	5	5	5	5	5	5	5

54
54
5D
5D

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

*** = Suspect**

Report Generated: 02/18/25 19:55

Report Version 6.0



CC: 2268
Rev.1

**SAN JOAQUIN VALLEY
Air Pollution Control District
TITLE V
DEVIATION REPORTING**

Company Name: Midway Sunset Cogeneration Company
Facility ID #: S-1135

DEVIATION

- 1. Permit Unit and Condition #:**
S-1135-0-5: Condition #5
S-1135-224-30: Conditions 20, 21, 31, 55, 65
- 2. Description of Permit Condition:**
Condition 5: The permittee must comply with all conditions of the permit.
Conditions 20, 21, 31: Permitted NO_x limits of 0.018 lbs/MMBtu, 5.0 ppmv and 17.66 lbs/hr respectfully.
Condition 55: All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.
Condition 65: The permittee must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, and 63 and all other applicable Federal, State, and local air quality regulations.
- 3. Date, time and duration of deviation:**
February 18, 2025; Unit A ran from 1333 hours to 1741 hours (standard time); 4 hours 8 minutes.
- 4. Description of deviation: (Includes excess emissions if applicable)**
This deviation is covered by Short Variance S-25-04S allowing the excess NO_x emissions during the tuning of Units A and C DLN1+TE combustion systems as long as the total NO_x lbs/hr did not exceed 2,962 pounds and CO lbs/hr did not exceed 224 over the variance period. Unit A's excess NO_x pounds emissions over this deviation period was 0 pounds. There were no excess CO emissions over this deviation period.
We did exceed our permitted Nox lbs/mmbtu limit for 1 hour.
- 5. Date and time when deviation was discovered:**
This deviation was preplanned and covered by Short Variance S-25-04S.
- 6. Probable cause of deviation:**
The cause for the deviation was the requisite testing and tuning of Units A and C DLN1+TE combustion systems.
- 7. Comments/corrective action taken:**

MSCC's DLN1+TE Units A and C combustion systems were successfully tuned and Units A and C are able to operate within all permit limits.

Condition 7 of Variance S-25-04S CONCLUSIONS AND ORDER requires that a Federal Title V deviation report be submitted each time a Federal Title V permit condition is violated.

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete:

Sincerely,



Lowell Pollema
Executive Director

February 28, 2025
661-768-3020

cc: File CC-2268 Rev.1
G. Jans
G. Davis
S. Urias
S. Parks (Acra)

Submitted using PAS Facility Portal:
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 13:00 Through 02/18/2025 17:59

Time Online Criteria: 1 minute(s)

Source Parameter Unit		UNIT_A								
		COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)	
02/18/25	13:00	41.0 U	0.091 E	18.5	65.8 E	67.8 U	0.113 E	30.5	31.4 E	54
02/18/25	14:00	3.2 U	0.003	3.2	1.6	14.9 U	0.016	14.9	4.3	54
02/18/25	15:00	23.0	0.029	23.0	13.4	15.2	0.018 E	15.2	4.9	54
02/18/25	16:00	19.9 D	0.025	19.9	11.3	15.2 D	0.018 E	15.2	4.9	54
02/18/25	17:00	24.7 D	0.063 E	17.3	53.7 E	17.1 D	0.029 E	12.0	10.6 E	54

Average	22.4	0.042	16.4	29.2	26.0	0.039	17.6	11.2
Minimum	3.2	0.003	3.2	1.6	14.9	0.016	12.0	4.3
Maximum	41.0	0.091	23.0	65.8	67.8	0.113	30.5	31.4
Summation	111.8	0.211	81.9	145.8	130.2	0.194	87.8	56.1
Geometric Mean	17.1	0.026	13.6	15.4	20.9	0.028	16.6	8.1
Included Data Points	5	5	5	5	5	5	5	5
Total number of Data Points	5	5	5	5	5	5	5	5

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/18/25 19:55

Report Version 6.0



CC: 2269

**SAN JOAQUIN VALLEY
Air Pollution Control District
TITLE V
DEVIATION REPORTING**

Company Name: Midway Sunset Cogeneration Company
Facility ID #: S-1135

DEVIATION

- 1. Permit Unit and Condition #:**
S-1135-0-5: Condition #5
S-1135-226-28: Conditions 20, 22, 32, 56, 66
- 2. Description of Permit Condition:**
Condition 5: The permittee must comply with all conditions of the permit.
Conditions 20, 22, 32: Permitted NOx limits of 0.018 lbs/MMBtu, 5.0 ppmv and 17.66 lbs/hr respectfully.
Condition 56: All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.
Condition 66: The permittee must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, and 63 and all other applicable Federal, State, and local air quality regulations.
- 3. Date, time and duration of deviation:**
February 18, 2025; Unit C ran from 1614 hours to 2314 hours (standard time); 7 hours 0 minutes.
- 4. Description of deviation: (Includes excess emissions if applicable)**
This deviation is covered by Short Variance S-25-04S allowing the excess NOx emissions during the tuning of Units A and C DLN1+TE combustion systems as long as the total NOx lbs/hr did not exceed 2,962 pounds and CO lbs/hr did not exceed 224 over the variance period. Unit C's excess NOx pounds emissions over this deviation period was 0.64 pounds. There were no excess CO emissions over this deviation period.
We did exceed our permitted Nox lbs/mmbtu and Nox ppm limits for 3 hours.
- 5. Date and time when deviation was discovered:**
This deviation was preplanned and covered by Short Variance S-25-04S.
- 6. Probable cause of deviation:**
The cause for the deviation was the requisite testing and tuning of Units A and C DLN1+TE combustion systems.
- 7. Comments/corrective action taken:**

MSCC's DLN1+TE Units A and C combustion systems were successfully tuned and Units A and C are able to operate within all permit limits.

Condition 6 of Variance S-25-04S CONCLUSIONS AND ORDER requires that a Federal Title V deviation report be submitted each time a Federal Title V permit condition is violated.

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete:

Sincerely,



Lowell Pollema
Executive Director

February 26, 2025
661-768-3020

cc: File CC-2269
G. Jans
G. Davis
S. Urias
S. Parks (Aera)

Submitted using PAS Facility Portal:
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 16:00 Through 02/18/2025 23:59

Time Online Criteria: 1 minute(s)

Source Parameter Unit		UNIT_C								
		COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)	
02/18/25	16:00	66.2 EUD	0.837 E	6.6	368.2 E	5.6 UD	0.055 E	0.6	14.8 E	54.5 D
02/18/25	17:00	33.1 U	0.106 E	22.5	47.3 E	94.5 EU	0.137 E	64.3	37.1 E	5.4
02/18/25	18:00	32.7 CU	0.038	32.7	17.1	53.5 ECU	0.085 E	53.5	17.7 E	5.4
02/18/25	19:00	19.0	0.022	19.0	9.7	17.6	0.020 E	17.6	5.5 E	
02/18/25	20:00	18.2	0.021	18.2	9.2	17.1	0.019 E	17.1	5.2 E	
02/18/25	21:00	5.4	0.006	5.4	2.5	18.3 E .64	0.020 E	18.3	5.3 E	
02/18/25	22:00	3.9 D	0.004	3.9	1.8	17.3 D	0.018	17.3	4.8	5.7
02/18/25	23:00	71.5 D	0.196 E	17.9	86.6 E	66.7 D	0.134 E	16.7	35.9 E	5.7

.64 excess NOX Lbs

Average	31.3	0.154	15.8	67.8	36.3	0.059	25.7	15.8
Minimum	3.9	0.004	3.9	1.8	5.6	0.018	0.6	4.8
Maximum	71.5	0.837	32.7	368.2	94.5	0.137	64.3	37.1
Summation	250.0	1.230	126.2	542.4	290.6	0.488	205.4	126.3
Geometric Mean	21.0	0.041	12.6	17.9	25.5	0.042	15.5	11.2
Included Data Points	8	8	8	8	8	8	8	8
Total number of Data Points	8	8	8	8	8	8	8	8

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/19/25 10:49

Report Version 6.0



CC: 2269
Rev.1

**SAN JOAQUIN VALLEY
Air Pollution Control District
TITLE V
DEVIATION REPORTING**

Company Name: Midway Sunset Cogeneration Company
Facility ID #: S-1135

DEVIATION

- 1. Permit Unit and Condition #:**
S-1135-0-5: Condition #5
S-1135-226-28: Conditions 20, 21, 37, 61, 71
- 2. Description of Permit Condition:**
Condition 5: The permittee must comply with all conditions of the permit.
Conditions 20, 21, 37: Permitted NOx limits of 0.018 lbs/MM Btu, 5.0 ppmv and 17.66 lbs/hr respectfully.
Condition 61: All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.
Condition 71: The permittee must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, and 63 and all other applicable Federal, State, and local air quality regulations.
- 3. Date, time and duration of deviation:**
February 18, 2025; Unit C ran from 1614 hours to 2314 hours (standard time); 7 hours 0 minutes.
- 4. Description of deviation: (Includes excess emissions if applicable)**
This deviation is covered by Short Variance S-25-04S allowing the excess NOx emissions during the tuning of Units A and C DLN1+TE combustion systems as long as the total NOx lbs/hr did not exceed 2.962 pounds and CO lbs/hr did not exceed 224 over the variance period. Unit C's excess NOx pounds emissions over this deviation period was 0.64 pounds. There were no excess CO emissions over this deviation period. We did exceed our permitted Nox lbs/mmBtu and Nox ppm limits for 3 hours.
- 5. Date and time when deviation was discovered:**
This deviation was preplanned and covered by Short Variance S-25-04S.
- 6. Probable cause of deviation:**
The cause for the deviation was the requisite testing and tuning of Units A and C DLN1+TE combustion systems.
- 7. Comments/corrective action taken:**

MSCC's DLN1+TE Units A and C combustion systems were successfully tuned and Units A and C are able to operate within all permit limits.

Condition 7 of Variance S-25-04S CONCLUSIONS AND ORDER requires that a Federal Title V deviation report be submitted each time a Federal Title V permit condition is violated.

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete;

Sincerely,



Lowell Pollema
Executive Director

February 28, 2025
661-768-3020

cc: File CC-2269 Rev.1
G. Jans
G. Davis
S. Urias
S. Parks (Aera)

Submitted using PAS Facility Portal:
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 16:00 Through 02/18/2025 23:59

Time Online Criteria: 1 minute(s)

Source	Parameter	Unit	UNIT_C							
			COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/18/25	16:00		66.2 EUD	0.837 E	6.6	368.2 E	5.6 UD	0.055 E	0.6	14.8 E
02/18/25	17:00		33.1 U	0.106 E	22.5	47.3 E	94.5 EU	0.137 E	64.3	37.1 E
02/18/25	18:00		32.7 CU	0.038	32.7	17.1	53.5 ECU	0.065 E	53.5	17.7 E
02/18/25	19:00		19.0	0.022	19.0	9.7	17.6	0.020 E	17.6	5.5 E
02/18/25	20:00		18.2	0.021	18.2	9.2	17.1	0.019 E	17.1	5.2 E
02/18/25	21:00		5.4	0.006	5.4	2.5	18.3 E .64	0.020 E	18.3	5.3 E
02/18/25	22:00		3.9 D	0.004	3.9	1.8	17.3 D	0.018	17.3	4.8 SD
02/18/25	23:00		71.5 D	0.196 E	17.9	86.6 E	66.7 D	0.134 E	16.7	35.9 E SD

.64 excess NOx Lbs

Average	31.3	0.154	15.8	67.8	38.3	0.059	25.7	15.8
Minimum	3.9	0.004	3.9	1.8	5.6	0.018	0.6	4.8
Maximum	71.5	0.837	32.7	368.2	94.5	0.137	64.3	37.1
Summation	250.0	1.230	126.2	542.4	290.6	0.468	205.4	126.3
Geometric Mean	21.0	0.041	12.6	17.9	25.5	0.042	15.5	11.2
Included Data Points	8	8	8	8	8	8	8	8
Total number of Data Points	8	8	8	8	8	8	8	8

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/19/25 10:49

Report Version 6.0



February 26, 2025

CC-2270

Mr. Kobi Blomberg
Air Quality Inspector
SJVAPCD Compliance Department
34946 Flyover Court
Bakersfield, CA 93308

Subject: Variance S-25-04S Summary Report

Dear Mr. Blomberg,

On February 12, 2025, MSCC was granted Short Variance S-25-04S for the testing and tuning Units A and C with DLN1+TE combustion systems. The recorded Nox and CO emissions were within GE's projected values and met the requirements of Variance S-25-04S.

The following is in response to Condition 9 of the District's recommendations for Short Variance S-25-04S (please see attached):

A. A detailed summary of all work and activities conducted during the variance period;

Tuning and testing at various loads.

B. The date(s), time(s), and total duration that Unit A and Unit C were undergoing commissioning;

Unit A:

Monday February 17, 2025: Tuning and testing from 1333 Hour to 2308 Hour. Duration of 9 hours and 35 minutes.

Tuesday February 18, 2025: Tuning and testing from 1333 Hour to 1741 Hour. Duration of 4 hours 8 minutes.

Wednesday February 19, 2025: Testing from 2256 Hour through February 20, 2025 0715 Hour. Duration of 8 hours 19 minutes.

Thursday February 20, 2025: Tuning and Testing from 1332 Hour to 2122 Hour. Duration of 7 hours 50 minutes.

Total duration that Unit A was undergoing tuning and testing: 29 hours 52 minutes.

Unit C:

Tuesday February 18, 2025: Tuning and testing from 1614 Hour to 2314 Hour. Duration of 7 hours 0 minutes.

Wednesday February 19, 2025: Tuning and testing from 1333 Hour through Thursday February 20, 2025 0112 Hour. Duration of 11 hours 39 minutes.

Total duration that Unit C was undergoing tuning and testing: 18 hours 39 minutes.

C. A revised calculation of the excess emissions during the variance period;

The attached emissions data was recorded by the continuous emissions monitoring system on each unit. Exemption of emissions by Rule 4703 for Startup and Shutdown were considered when evaluating Nox and CO emissions. All emissions data are recorded in standard time.

Monday February 17, 2025:

Unit A Total NOx pounds excess emissions 7.68 pounds of NOx emissions. There were no CO excess emissions.

Tuesday February 18, 2025:

Unit A Had zero excess pounds of NOx or CO emissions.
We did exceed our permit limit for NOxLB/MMBTU for 1 hour.

Unit C Total NOx pounds excess emissions 0.64 pounds of NOx emissions. There were no CO excess emissions. We did exceed our permit limit for NOxLB/MMBTU and Nox ppm for 3 hours.

Total pounds of excess emissions during tuning and testing:

NOx: 8.32

There were no recorded excess CO emissions not exempted by Rule 4703 Start Up and Shutdown.

D. The required certification of truth, accuracy, and completeness, signed by the designated responsible official of the partnership, as required by Sections 9.13.1 and 10.0 of District Rule 2520-Federally Mandated Operating Permits. (see below)

Deviation Reports for each day that a Federal Title V permit condition was violated during the variance are included in the Variance Summary Report. Excess emissions exempted by Rule 4703 Start Up and Shutdown are not listed in this report. If you have any questions or comments, please contact Greg Jans at 661-768-3018 or Greg Davis at 661-768-3028.

I declare, that, based on information and belief formed after reasonable inquiry, the information provided in this letter is true, accurate and complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Lowell Pollema", written over the word "Sincerely,".

Lowell Pollema
Executive Director

cc: File CC-2270
G. Jans
G. Davis
S. Urias
S. Park (Aera)

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/19/2025 13:00 Through 02/20/2025 01:59

Time Online Criteria: 1 minute(s)

Source Parameter Unit	UNIT_C							
	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/19/25 13:00	43.9 U	0.157 E	19.8	70.4 E	95.3 EU	0.157 E	42.9	43.1 E <i>Su</i>
02/19/25 14:00	3.3 U	0.004	3.3	1.6	38.0 EU	0.041 E	38.0	11.0 E <i>Su</i>
02/19/25 15:00	2.0	0.002	2.0	0.9	15.1	0.016	15.1	4.4
02/19/25 16:00	14.6	0.018	14.6	8.0	12.6	0.015	12.6	4.1
02/19/25 17:00	27.6	0.038	27.6	17.1	11.7	0.016	11.7	4.4
02/19/25 18:00	16.4	0.020	16.4	8.9	14.8	0.017	14.8	4.5
02/19/25 19:00	13.7	0.017	13.7	7.7	13.8	0.017	13.8	4.5
02/19/25 20:00	14.6	0.017	14.6	7.6	14.1	0.016	14.1	4.3
02/19/25 21:00	6.5	0.007	6.5	3.3	14.4	0.016	14.4	4.4
02/19/25 22:00	5.9	0.007	5.9	2.9	14.3	0.016	14.3	4.3
02/19/25 23:00	21.3	0.027	21.3	12.2	12.0	0.015	12.0	4.2
02/20/25 00:00	22.3 D	0.029	22.3	12.9	11.9 D	0.016	11.9	4.2 <i>SD</i>
02/20/25 01:00	73.9 ED	0.209 E	16.3	92.8 E	54.3 ED	0.130 E	12.0	35.1 E <i>SD</i>

Average	20.5	0.042	14.2	18.9	24.8	0.038	17.5	10.2
Minimum	2.0	0.002	2.0	0.9	11.7	0.015	11.7	4.1
Maximum	73.9	0.209	27.6	92.8	95.3	0.157	42.9	43.1
Summation	266.0	0.552	184.3	246.3	322.3	0.488	227.6	132.5
E = Unit Offline Geometric Mean	13.5	0.019	11.3	8.4	18.8	0.024	15.8	6.5
E = Exceedance								
C = Calibration								
Included Data Points	13	13	13	13	13	13	13	13
M = Maintenance								
Total number of Data Points	13	13	13	13	13	13	13	13
T = Out Of Control								
* = Suspect								

Report Generated: 02/25/25 14:14

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 22:00 Through 02/19/2025 07:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/18/25	22:00	54.7 U	0.349 E	3.8	156.9 E	10.3 U	0.072 E	0.7	19.6 E
02/18/25	23:00	26.2 U	0.032	26.2	14.4	39.9 EU	0.051 E	39.9	13.7 E
02/19/25	00:00	20.3	0.026	20.3	11.6	13.2	0.017	13.2	4.5
02/19/25	01:00	23.3	0.030	23.3	13.5	12.9	0.017	12.9	4.6
02/19/25	02:00	45.6 U	0.086 E	28.9	38.7 E	47.3 EU	0.068 E	29.3	18.6 E
02/19/25	03:00	36.7 U	0.092 E	23.1	41.1 E	17.1 U	0.033 E	10.8	9.2 E
02/19/25	04:00	17.9 U	0.021	17.9	9.4	27.2 EU	0.034 E	27.2	9.3 E
02/19/25	05:00	7.8	0.009	7.8	3.9	14.1	0.016	14.1	4.3
02/19/25	06:00	7.8 D	0.009	7.8	4.0	14.3 D	0.016	14.3	4.4
02/19/25	07:00	2.8 ICD	0.012	0.0 IC	5.5	3.9 ICD	0.017	3.9 IC	4.5

SD

SD

SD

SD SD

SD SD

SD

SD

SD

Average	26.8	0.067	17.7	29.9	21.8	0.034	18.0	9.3
Minimum	7.8	0.009	3.8	3.9	10.3	0.016	0.7	4.3
Maximum	54.7	0.349	28.9	156.9	47.3	0.072	39.9	19.6
Summation	241.3	0.686	159.1	299.0	196.3	0.341	162.4	92.7
Geometric Mean	27.8	0.033	14.8	14.6	25.4	0.028	12.6	7.7
Included Data Points	9	10	9	10	9	10	9	10
Total number of units online	10	10	10	10	10	10	10	10

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/26/25 15:08

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/20/2025 13:00 Through 02/20/2025 21:59

Time Online Criteria: 1 minute(s)

Source	Parameter Unit	UNIT_A							
		COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/20/25	13:00	44.3 U	0.091 E	20.8	40.8 E	67.4 EU	0.110 E	31.7	29.8 E
02/20/25	14:00	3.1 U	0.003	3.1	1.6	15.4 U	0.017	15.4	4.5
02/20/25	15:00	21.8	0.029	21.8	12.6	12.7	0.016	12.7	4.4
02/20/25	16:00	24.4	0.034	24.4	15.2	12.7	0.016	12.7	4.5
02/20/25	17:00	32.0	0.039	32.0	17.6	15.5	0.019 E	15.5	5.1 E
02/20/25	18:00	59.1 EU	0.087 E	36.7	39.0 E	45.4 EU	0.057 E	28.1	15.5 E
02/20/25	19:00	27.7 UD	0.076 E	17.5	33.8 E	20.7 EUD	0.036 E	13.0	9.8 E
02/20/25	20:00	25.1 UD	0.031	25.1	13.9	44.6 EUD	0.063 E	44.6	17.0 E
02/20/25	21:00	66.6 ED	0.210 E	26.6	94.3 E	34.1 ED	0.082 E	13.6	22.4 E
Average		33.8	0.067	23.1	29.9	29.8	0.046	20.8	12.6
Minimum		3.1	0.003	3.1	1.6	12.7	0.016	12.7	4.4
Maximum		66.6	0.210	36.7	94.3	67.4	0.110	44.6	29.8
Summation		304.1	0.600	208.0	268.8	268.5	0.416	187.3	113.0
Geometric Mean		26.5	0.042	19.8	19.3	24.9	0.036	18.6	9.7
Included Data Points		9	9	9	9	9	9	9	9
Total number of Data Points		9	9	9	9	9	9	9	9

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

*** = Suspect**

Report Generated: 02/25/25 14:17

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 16:00 Through 02/18/2025 23:59

Time Online Criteria: 1 minute(s)

Source		UNIT_C							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/18/25	16:00	66.2 EUD	0.837 E	6.8	368.2 E	5.6 UD	0.055 E	0.6	14.8 E
02/18/25	17:00	33.1 U	0.106 E	22.5	47.3 E	94.5 EU	0.137 E	64.3	37.1 E
02/18/25	18:00	32.7 CU	0.038	32.7	17.1	53.5 ECU	0.065 E	53.5	17.7 E
02/18/25	19:00	19.0	0.022	19.0	9.7	17.6	0.020 E	17.6	5.5 E
02/18/25	20:00	18.2	0.021	18.2	9.2	17.1	0.019 E	17.1	5.2 E
02/18/25	21:00	5.4	0.006	5.4	2.5	18.3 E	0.020 E	18.3	5.3 E
02/18/25	22:00	3.9 D	0.004	3.9	1.8	17.3 D	0.018	17.3	4.8
02/18/25	23:00	71.5 D	0.196 E	17.9	86.6 E	66.7 D	0.134 E	16.7	35.9 E
.64 excess NOX Lbs									
Average		31.3	0.154	15.8	67.8	36.3	0.059	25.7	15.8
Minimum		3.9	0.004	3.9	1.8	5.6	0.018	0.6	4.8
Maximum		71.5	0.837	32.7	368.2	94.5	0.137	64.3	37.1
Summation		250.0	1.230	126.2	542.4	290.6	0.468	205.4	126.3
Geometric Mean		21.0	0.041	12.6	17.9	25.5	0.042	15.5	11.2
Included Data Points		8	8	8	8	8	8	8	8
Total number of Data Points		8	8	8	8	8	8	8	8

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

*** = Suspect**

Report Generated: 02/19/25 10:49

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 13:00 Through 02/18/2025 17:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/18/25	13:00	41.0 U	0.091 E	18.5	65.8 E	67.8 U	0.113 E	30.5	31.4 E
02/18/25	14:00	3.2 U	0.003	3.2	1.6	14.9 U	0.016	14.9	4.3
02/18/25	15:00	23.0	0.029	23.0	13.4	15.2	0.018 E	15.2	4.9
02/18/25	16:00	19.9 D	0.025	19.9	11.3	15.2 D	0.018 E	15.2	4.9
02/18/25	17:00	24.7 D	0.063 E	17.3	53.7 E	17.1 D	0.029 E	12.0	10.6 E
Average		22.4	0.042	16.4	29.2	26.0	0.039	17.6	11.2
Minimum		3.2	0.003	3.2	1.6	14.9	0.016	12.0	4.3
Maximum		41.0	0.091	23.0	65.8	67.8	0.113	30.5	31.4
Summation		111.8	0.211	81.9	145.8	130.2	0.194	87.8	56.1
Geometric Mean		17.1	0.026	13.6	15.4	20.9	0.028	16.6	8.1
Included Data Points		5	5	5	5	5	5	5	5
Total number of Data Points		5	5	5	5	5	5	5	5

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/18/25 19:55

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/17/2025 13:00 Through 02/17/2025 23:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/17/25	13:00	48.8 U	0.106 E	22.0	46.6 E	59.8 EU	0.105 E	26.9	28.3 E
02/17/25	14:00	5.6 U	0.006	5.6	2.7	15.8 U	0.017	15.8	4.6
02/17/25	15:00	1.3	0.001	1.3	0.7	24.6 E 6.94	0.026 E	24.6	7.1 E
02/17/25	16:00	2.7	0.003	2.7	1.3	14.5	0.016	14.5	4.2
02/17/25	17:00	1.6	0.002	1.6	0.7	18.4 E 7.4	0.020 E	18.4	5.3 E
02/17/25	18:00	4.6	0.005	4.6	2.2	14.8	0.016	14.8	4.2
02/17/25	19:00	7.9	0.009	7.9	3.8	14.1	0.016	14.1	4.2
02/17/25	20:00	9.1	0.010	9.1	4.3	14.9	0.016	14.9	4.3
02/17/25	21:00	10.3	0.012	10.3	5.4	13.8	0.016	13.8	4.4
02/17/25	22:00	27.2 D	0.039	27.2	17.2	11.8 D	0.016	11.8	4.4
02/17/25	23:00	60.2 D	0.265 E	9.0	118.6 E	62.4 D	0.183 E	9.4	49.8 E

7.68 excess NOx lbs

Average	16.3	0.042	9.2	18.5	24.1	0.041	16.3	11.0
Minimum	1.3	0.001	1.3	0.7	11.8	0.016	9.4	4.2
Maximum	60.2	0.265	27.2	118.6	62.4	0.183	26.9	49.8
Summation	179.3	0.458	101.3	203.5	264.9	0.447	179.0	120.8
Geometric Mean	8.0	0.011	6.3	4.8	19.9	0.025	15.6	6.8
Included Data Points	11	11	11	11	11	11	11	11
Total number of Exceedance	11	11	11	11	11	11	11	11

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/18/25 19:47

Report Version 6.0



February 28, 2025

CC-2270
Rev.1

Mr. Kobi Blomberg
Air Quality Inspector
SJVAPCD Compliance Department
34946 Flyover Court
Bakersfield, CA 93308

Subject: Variance S-25-04S Summary Report

Dear Mr. Blomberg,

On February 12, 2025, MSCC was granted Short Variance S-25-04S for the testing and tuning Units A and C with DLN1+TE combustion systems. The recorded Nox and CO emissions were within GE's projected values and met the requirements of Variance S-25-04S.

The following is in response to Condition 9 of the District's recommendations for Short Variance S-25-04S (please see attached):

A. A detailed summary of all work and activities conducted during the variance period;

Tuning and testing at various loads.

B. The date(s), time(s), and total duration that Unit A and Unit C were undergoing commissioning;

Unit A:

Monday February 17, 2025: Tuning and testing from 1333 Hour to 2308 Hour. Duration of 9 hours and 35 minutes.

Tuesday February 18, 2025: Tuning and testing from 1333 Hour to 1741 Hour. Duration of 4 hours 8 minutes.

Wednesday February 19, 2025: Testing from 2256 Hour through February 20, 2025 0715 Hour. Duration of 8 hours 19 minutes.

Thursday February 20, 2025: Tuning and Testing from 0055 Hour to 2122 Hour. Duration of 21 hours 27 minutes.

Total duration that Unit A was undergoing tuning and testing: 43 hours 29 minutes.

Unit C:

Tuesday February 18, 2025: Tuning and testing from 1614 Hour to 2314 Hour. Duration of 7 hours 0 minutes.

Wednesday February 19, 2025: Tuning and testing from 1333 Hour through Thursday February 20, 2025 0112 Hour. Duration of 11 hours 39 minutes.

Total duration that Unit C was undergoing tuning and testing: 18 hours 39 minutes.

C. A revised calculation of the excess emissions during the variance period;

The attached emissions data was recorded by the continuous emissions monitoring system on each unit. Exemption of emissions by Rule 4703 for Startup and Shutdown were considered when evaluating Nox and CO emissions. All emissions data are recorded in standard time.

Monday February 17, 2025:

Unit A total NOx pounds excess emissions 7.68 pounds of NOx emissions. There were no CO excess emissions.

Tuesday February 18, 2025:

Unit A had zero excess pounds of NOx or CO emissions.
We did exceed our permit limit for NOxLB/MMBTU for 1 hour.

Unit C total NOx pounds excess emissions 0.64 pounds of NOx emissions. There were no CO excess emissions. We did exceed our permit limit for NOxLB/MMBTU and NOx ppm for 3 hours.

Thursday February 20, 2025:

Unit A total NOx pounds excess emissions 19.96 pounds of NOx emissions. There were no CO excess emissions.

Total pounds of excess emissions during tuning and testing:

NOx: 28.28

There were no recorded excess CO emissions not exempted by Rule 4703 Start Up and Shutdown.

D. The required certification of truth, accuracy, and completeness, signed by the designated responsible official of the partnership, as required by Sections 9.13.1 and 10.0 of District Rule 2520-Federally Mandated Operating Permits. (see below)

Deviation Reports for each day that a Federal Title V permit condition was violated during the variance are included in the Variance Summary Report. Excess emissions exempted by Rule 4703 Start Up and Shutdown are not listed in this report. If you have any questions or comments, please contact Greg Jans at 661-768-3018 or Greg Davis at 661-768-3028.

I declare, that, based on information and belief formed after reasonable inquiry, the information provided in this letter is true, accurate and complete.

Sincerely

A handwritten signature in black ink, appearing to read "Lowell Pollema", written in a cursive style.

Lowell Pollema
Executive Director

cc: File CC-2270 Rev.1
G. Jans
G. Davis
S. Urias
S. Park (Aera)

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/19/2025 13:00 Through 02/20/2025 01:59

Time Online Criteria: 1 minute(s)

Source		UNIT_C							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/19/25	13:00	43.9 U	0.157 E	19.8	70.4 E	95.3 EU	0.157 E	42.9	43.1 E SU
02/19/25	14:00	3.3 U	0.004	3.3	1.8	38.0 EU	0.041 E	38.0	11.0 E SU
02/19/25	15:00	2.0	0.002	2.0	0.9	15.1	0.016	15.1	4.4
02/19/25	16:00	14.6	0.018	14.6	8.0	12.6	0.015	12.6	4.1
02/19/25	17:00	27.6	0.038	27.6	17.1	11.7	0.018	11.7	4.4
02/19/25	18:00	16.4	0.020	16.4	8.9	14.8	0.017	14.8	4.5
02/19/25	19:00	13.7	0.017	13.7	7.7	13.8	0.017	13.8	4.5
02/19/25	20:00	14.6	0.017	14.6	7.6	14.1	0.016	14.1	4.3
02/19/25	21:00	6.5	0.007	6.5	3.3	14.4	0.016	14.4	4.4
02/19/25	22:00	5.9	0.007	5.9	2.9	14.3	0.016	14.3	4.3
02/19/25	23:00	21.3	0.027	21.3	12.2	12.0	0.015	12.0	4.2
02/20/25	00:00	22.3 D	0.029	22.3	12.9	11.9 D	0.016	11.9	4.2 SD
02/20/25	01:00	73.9 ED	0.209 E	16.3	92.8 E	54.3 ED	0.130 E	12.0	35.1 E SD

Average	20.5	0.042	14.2	18.9	24.8	0.038	17.5	10.2
Minimum	2.0	0.002	2.0	0.9	11.7	0.015	11.7	4.1
Maximum	73.9	0.209	27.6	92.8	95.3	0.157	42.9	43.1
Summation	266.0	0.552	184.3	246.3	322.3	0.488	227.6	132.5
E = Unit Offline	13.5	0.019	11.3	8.4	18.8	0.024	15.8	6.5
E = Exceedance								
C = Calibration	13	13	13	13	13	13	13	13
M = Maintenance								
T = Out Of Control	13	13	13	13	13	13	13	13

* = Suspect

Report Generated: 02/25/25 14:14

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 22:00 Through 02/19/2025 07:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/18/25	22:00	54.7 U	0.349 E	3.8	156.9 E	10.3 U	0.072 E	0.7	19.6 E
02/18/25	23:00	26.2 U	0.032	26.2	14.4	39.9 EU	0.051 E	39.9	13.7 E
02/19/25	00:00	20.3	0.026	20.3	11.6	13.2	0.017	13.2	4.5
02/19/25	01:00	23.3	0.030	23.3	13.5	12.9	0.017	12.9	4.6
02/19/25	02:00	46.6 U	0.086 E	28.9	38.7 E	47.3 EU	0.088 E	29.3	18.6 E
02/19/25	03:00	36.7 U	0.092 E	23.1	41.1 E	17.1 U	0.033 E	10.8	9.2 E
02/19/25	04:00	17.9 U	0.021	17.9	9.4	27.2 EU	0.034 E	27.2	9.3 E
02/19/25	05:00	7.8	0.009	7.8	3.9	14.1	0.016	14.1	4.3
02/19/25	06:00	7.8 D	0.009	7.8	4.0	14.3 D	0.016	14.3	4.4
02/19/25	07:00	2.8 IC	0.012	0.0 IC	5.6	3.9 CD	0.017	0.0 IC	4.5
Average		26.8	0.067	17.7	29.9	21.8	0.034	18.0	9.3
Minimum		7.8	0.009	3.8	3.9	10.3	0.016	0.7	4.3
Maximum		54.7	0.349	28.9	156.9	47.3	0.072	39.9	19.6
Summation		241.3	0.666	159.1	299.0	196.3	0.341	162.4	92.7
Geometric Mean		27.8	0.033	14.8	14.6	25.4	0.028	12.6	7.7
Included Data Points		9	10	9	10	9	10	9	10
Total number of Units Offline		10	10	10	10	10	10	10	10

SD

SD

SD

SD

SD

SD

SD

SD

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/26/25 15:08

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/20/2025 13:00 Through 02/20/2025 21:59

Time Online Criteria: 1 minute(s)

Source	Parameter Unit	UNIT_A							
		COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/20/25	13:00	44.3 U	0.091 E	20.8	40.8 E	67.4 EU	0.110 E	31.7	29.8 E
02/20/25	14:00	3.1 U	0.003	3.1	1.6	15.4 U	0.017	15.4	4.5
02/20/25	15:00	21.8	0.029	21.8	12.6	12.7	0.016	12.7	4.4
02/20/25	16:00	24.4	0.034	24.4	15.2	12.7	0.016	12.7	4.5
02/20/25	17:00	32.0	0.039	32.0	17.6	15.5	0.019 E	15.5	5.1 E
02/20/25	18:00	59.1 EU	0.087 E	36.7	39.0 E	45.4 EU	0.057 E	28.1	15.5 E
02/20/25	19:00	27.7 UD	0.076 E	17.5	33.8 E	20.7 EUD	0.036 E	13.0	9.8 E
02/20/25	20:00	25.1 UD	0.031	25.1	13.9	44.6 EUD	0.063 E	44.6	17.0 E
02/20/25	21:00	66.6 ED	0.210 E	26.6	94.3 E	34.1 ED	0.082 E	13.6	22.4 E
Average		33.8	0.067	23.1	29.9	29.8	0.046	20.8	12.6
Minimum		3.1	0.003	3.1	1.6	12.7	0.016	12.7	4.4
Maximum		66.6	0.210	36.7	94.3	67.4	0.110	44.6	29.8
Summation		304.1	0.600	208.0	268.8	268.5	0.416	187.3	113.0
Geometric Mean		26.5	0.042	19.8	19.3	24.9	0.036	18.6	9.7
Included Data Points		9	9	9	9	9	9	9	9
Total number of Data Points		9	9	9	9	9	9	9	9

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/25/25 14:17

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 16:00 Through 02/18/2025 23:59

Time Online Criteria: 1 minute(s)

Source		UNIT_C							
Parameter Unit		CO ₂ /HR (LB/HR)	CO ₂ /MM (LB/MMBTU)	CO ₂ S (LBS)	CO ₂ PPMC (PPMC)	NO _x LB/HR (LB/HR)	NO _x LB/MM (LB/MMBTU)	NO _x LB (LBS)	NO _x PPMC (PPMC)
02/18/25	16:00	66.2 EUD	0.837 E	6.6	366.2 E	5.6 UD	0.055 E	0.6	14.8 E
02/18/25	17:00	33.1 U	0.106 E	22.5	47.3 E	94.5 EU	0.137 E	64.3	37.1 E
02/18/25	18:00	32.7 CU	0.038	32.7	17.1	53.5 ECU	0.065 E	53.5	17.7 E
02/18/25	19:00	18.0	0.022	19.0	9.7	17.6	0.020 E	17.6	5.5 E
02/18/25	20:00	18.2	0.021	18.2	9.2	17.1	0.01 E	17.1	5.2 E
02/18/25	21:00	5.4	0.006	5.4	2.5	18.3 E .64	0.020 E	18.3	5.3 E
02/18/25	22:00	3.9 D	0.004	3.9	1.8	17.3 D	0.018	17.3	4.8
02/18/25	23:00	71.5 D	0.198 E	17.9	86.6 E	66.7 D	0.134 E	16.7	35.9 E
.64 excess NO _x Lbs									
Average		31.3	0.154	15.8	67.8	38.3	0.059	25.7	15.8
Minimum		3.9	0.004	3.9	1.8	5.6	0.018	0.6	4.8
Maximum		71.5	0.837	32.7	366.2	94.5	0.137	64.3	37.1
Summation		260.0	1.230	128.2	542.4	290.6	0.489	205.4	126.3
Geometric Mean		21.0	0.041	12.6	17.9	25.5	0.042	15.5	11.2
Included Data Points		8	8	8	8	8	8	8	8
Total number of Data Points		8	8	8	8	8	8	8	8

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/19/25 10:49

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/18/2025 13:00 Through 02/18/2025 17:59

Time Online Criteria: 1 minute(s)

Source Parameter Unit	UNIT_A							
	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/18/25 13:00	41.0 U	0.091 E	18.5	65.8 E	67.8 U	0.113 E	30.5	31.4 E
02/18/25 14:00	3.2 U	0.003	3.2	1.6	14.9 U	0.016	14.9	4.3
02/18/25 15:00	23.0	0.029	23.0	13.4	15.2	0.018 E	15.2	4.9
02/18/25 16:00	19.9 D	0.025	19.9	11.3	15.2 D	0.018 E	15.2	4.9
02/18/25 17:00	24.7 D	0.063 E	17.3	53.7 E	17.1 D	0.029 E	12.0	10.6 E
Average	22.4	0.042	16.4	29.2	26.0	0.039	17.6	11.2
Minimum	3.2	0.003	3.2	1.6	14.9	0.016	12.0	4.3
Maximum	41.0	0.091	23.0	65.8	67.8	0.113	30.5	31.4
Summation	111.8	0.211	81.9	145.8	130.2	0.194	87.8	56.1
Geometric Mean	17.1	0.026	13.6	15.4	20.9	0.028	16.6	8.1
Included Data Points	5	5	5	5	5	5	5	5
Total number of Data Points	5	5	5	5	5	5	5	5

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/18/25 19:55

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/17/2025 13:00 Through 02/17/2025 23:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LB/HR)	COLB/MM (LB/MMBTU)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LB/HR)	NOXLB/MM (LB/MMBTU)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/17/25	13:00	48.8 U	0.106 E	22.0	46.6 E	59.8 EU	0.105 E	26.9	28.3 E
02/17/25	14:00	5.6 U	0.006	5.6	2.7	15.8 U	0.017	15.8	4.6
02/17/25	15:00	1.3	0.001	1.3	0.7	24.6 E 6.94	0.026 E	24.6	7.1 E
02/17/25	16:00	2.7	0.003	2.7	1.3	14.5	0.016	14.5	4.2
02/17/25	17:00	1.6	0.002	1.6	0.7	18.4 E 7.4	0.020 E	18.4	5.3 E
02/17/25	18:00	4.6	0.005	4.6	2.2	14.8	0.016	14.8	4.2
02/17/25	19:00	7.9	0.009	7.9	3.8	14.1	0.016	14.1	4.2
02/17/25	20:00	9.1	0.010	9.1	4.3	14.9	0.016	14.9	4.3
02/17/25	21:00	10.3	0.012	10.3	5.4	13.8	0.016	13.8	4.4
02/17/25	22:00	27.2 D	0.039	27.2	17.2	11.8 D	0.016	11.8	4.4
02/17/25	23:00	60.2 D	0.265 E	9.0	118.6 E	62.4 D	0.183 E	9.4	49.8 E

7.68 excess NOX lbs

Average	16.3	0.042	9.2	18.5	24.1	0.041	16.3	11.0
Minimum	1.3	0.001	1.3	0.7	11.8	0.016	9.4	4.2
Maximum	60.2	0.265	27.2	118.6	62.4	0.183	26.9	49.8
Summation	179.3	0.458	101.3	203.5	264.9	0.447	179.0	120.8
Geometric Mean	8.0	0.011	6.3	4.8	19.9	0.025	15.6	6.8
Included Data Points	11	11	11	11	11	11	11	11
Total number of Exceedance	11	11	11	11	11	11	11	11

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/18/25 19:47

Report Version 6.0

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/20/2025 00:00 Through 02/20/2025 23:59

Time Online Criteria: 1 minute(s)

Source	Parameter Unit	UNIT_A							
		COLB/HR (/ R/HR)	COLB/MM (/ R/MMRT/)	COLBS (/ RS)	COPPMC (PPMC)	NOXLB/HR (/ R/HR)	NOXLB/MM (/ R/MMRT/)	NOXLBS (/ RS)	NOXPPMC (PPMC)
02/20/25	00:00	49.5 U	0.313 E	4.0	140.7 E	9.9 U	0.068 E	0.8	18.7 E <i>54</i>
02/20/25	01:00	26.5 U	0.035	26.5	15.9	43.2 EU	0.059 E	43.2	16.2 E <i>54</i>
02/20/25	02:00	10.9	0.014	10.9	8.1	23.2 E <i>5.54</i>	0.028 E	23.2	7.7 E
02/20/25	03:00	19.6	0.026	19.6	11.5	21.2 E <i>3.54</i>	0.028 E	21.2	7.6 E
02/20/25	04:00	21.4	0.028	21.4	12.5	21.2 E <i>3.54</i>	0.028 E	21.2	7.6 E
02/20/25	05:00	4.2	0.005	4.2	2.2	25.0 E <i>7.34</i>	0.029 E	25.0	7.9 E
02/20/25	06:00	7.9 D	0.010	7.9	4.3	24.7 ED	0.029 E	24.7	7.9 E <i>SD</i>
02/20/25	07:00	79.2 ECD	0.260 E	10.3	115.3 E	41.3 ECD	0.115 E	5.4	31.0 E <i>SD</i>
02/20/25	08:00	0.0 FID	0.001 FI	0.0 F	-19.2 FI	0.0 FID	0.001 FI	0.0 F	-0.4 FI
02/20/25	09:00	0.0 FID	0.001 FI	0.0 F	-17.1 FI	0.0 FID	0.001 FI	0.0 F	-0.1 FI
02/20/25	10:00	0.0 FID	0.001 FI	0.0 F	-15.5 FI	0.1 FID	0.001 FI	0.0 F	-0.4 FI
02/20/25	11:00	0.0 FID	0.001 FI	0.0 F	-16.2 FI	0.1 FID	0.001 FI	0.0 F	-0.9 FI
02/20/25	12:00	0.0 FID	0.001 FI	0.0 F	-16.1 FI	0.0 FID	0.001 FI	0.0 F	-0.2 FI
02/20/25	13:00	44.3 U	0.091 E	20.8	40.8 E	67.4 EU	0.110 E	31.7	29.8 E
02/20/25	14:00	3.1 U	0.003	3.1	1.6	15.4 U	0.017	15.4	4.5
02/20/25	15:00	21.8	0.029	21.8	12.6	12.7	0.016	12.7	4.4
02/20/25	16:00	24.4	0.034	24.4	15.2	12.7	0.016	12.7	4.5
02/20/25	17:00	32.0	0.039	32.0	17.6	15.5	0.019 E	15.5	5.1 E <i>54</i>
02/20/25	18:00	59.1 EU	0.087 E	36.7	39.0 E	45.4 EU	0.057 E	28.1	15.5 E <i>54 SD</i>
02/20/25	19:00	27.7 UD	0.026 E	17.5	33.8 E	20.7 EUD	0.036 E	13.0	9.8 E <i>SD 54</i>
02/20/25	20:00	25.1 UD	0.031	25.1	13.9	44.6 EUD	0.063 E	44.6	17.0 E <i>SD 54</i>
02/20/25	21:00	66.6 ED	0.210 E	26.6	94.3 E	34.1 ED	0.082 E	13.6	22.4 E <i>SD</i>
02/20/25	22:00	0.0 FID	0.001 FI	0.0 F	-19.1 FI	0.0 FID	0.001 FI	0.0 F	-0.6 FI
02/20/25	23:00	0.0 FID	0.001 FI	0.0 F	-16.5 FI	0.0 FID	0.001 FI	0.0 F	-0.1 FI

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/28/25 10:44

Report Version 6.0

19.96 Total Lbs excess NOx

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/20/2025 00:00 Through 02/20/2025 23:59

Time Online Criteria: 1 minute(s)

Average	30.8	0.076	18.4	34.0	28.1	0.047	20.7	12.8
Minimum	3.1	0.003	3.1	1.6	9.9	0.016	0.8	4.4
Maximum	79.2	0.313	36.7	140.7	67.4	0.115	44.6	31.0
Summation	523.3	1.291	312.8	577.3	478.2	0.800	352.0	217.6
Geometric Mean	22.6	0.038	14.8	17.0	24.5	0.038	16.1	10.4
Included Data Points	17	17	17	17	17	17	17	17
Total number of Data Points	24	24	24	24	24	24	24	24

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

*** = Suspect**

Report Generated: 02/28/25 10:44

Report Version 6.0



CC: 2271

**SAN JOAQUIN VALLEY
Air Pollution Control District
TITLE V
DEVIATION REPORTING**

Company Name: Midway Sunset Cogeneration Company
Facility ID #: S-1135

DEVIATION

1. Permit Unit and Condition #:

S-1135-0-5: Condition #5

S-1135-224-30: Conditions 20, 21, 31, 55, 65

2. Description of Permit Condition:

Condition 5: The permittee must comply with all conditions of the permit.

Conditions 20, 21, 31: Permitted NO_x limits of 0.018 lbs/MM Btu, 5.0 ppmv and 17.66 lbs/hr respectively.

Condition 55: All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.

Condition 65: The permittee must construct and operate the proposed power plant in compliance with all other applicable provisions of 40 CFR Parts 52, 60, and 63 and all other applicable Federal, State, and local air quality regulations.

3. Date, time and duration of deviation:

February 20, 2025; Unit A ran from 0055 hours to 2122 hours (standard time); 21 hours 27 minutes.

4. Description of deviation: (Includes excess emissions if applicable)

This deviation is covered by Short Variance S-25-04S allowing the excess NO_x emissions during the tuning of Units A and C DLNI+TE combustion systems as long as the total NO_x lbs/hr did not exceed 2,962 pounds and CO lbs/hr did not exceed 224 over the variance period. Unit A's excess NO_x pounds emissions over this deviation period was 19.96 pounds. There were no excess CO emissions over this deviation period.

5. Date and time when deviation was discovered:

This deviation was preplanned and covered by Short Variance S-25-04S.

6. Probable cause of deviation:

The cause for the deviation was the requisite testing and tuning of Units A and C DLNI+TE combustion systems.

7. Comments/corrective action taken:

MSCC's DLNI+TE Units A and C combustion systems were successfully tuned and Units A and C are able to operate within all permit limits.

Condition 7 of Variance S-25-04S CONCLUSIONS AND ORDER requires that a Federal Title V deviation report be submitted each time a Federal Title V permit condition is violated.

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete:

Sincerely,



Lowell Pollema
Executive Director

February 28, 2025
661-768-3020

cc: File CC-2271
G. Jans
G. Davis
S. Urias
S. Parks (Aera)

Submitted using PAS Facility Portal:
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/20/2025 00:00 Through 02/20/2025 23:59

Time Online Criteria: 1 minute(s)

Source		UNIT_A							
Parameter	Unit	COLB/HR (LBS/HR)	COLB/MM (LBS/MMRTT)	COLBS (LBS)	COPPMC (PPMC)	NOXLB/HR (LBS/HR)	NOXLB/MM (LBS/MMRTT)	NOXLBS (LBS)	NOXPPMC (PPMC)
02/20/25	00:00	49.5 U	0.313 E	4.0	140.7 E	9.9 U	0.068 E	0.8	18.7 E
02/20/25	01:00	26.5 U	0.035	26.5	15.9	43.2 EU	0.059 E	43.2	16.2 E
02/20/25	02:00	10.9	0.014	10.9	6.1	23.2 E	0.028 E	23.2	7.7 E
02/20/25	03:00	19.6	0.026	19.6	11.5	21.2 E	0.028 E	21.2	7.6 E
02/20/25	04:00	21.4	0.028	21.4	12.5	21.2 E	0.028 E	21.2	7.6 E
02/20/25	05:00	4.2	0.005	4.2	2.2	25.0 E	0.029 E	25.0	7.9 E
02/20/25	06:00	7.9 D	0.010	7.9	4.3	24.7 ED	0.029 E	24.7	7.9 E
02/20/25	07:00	79.2 ECD	0.260 E	10.3	115.3 E	41.3 ECD	0.115 E	5.4	31.0 E
02/20/25	08:00	0.0 FID	0.001 FI	0.0 F	-19.2 FI	0.0 FID	0.001 FI	0.0 F	-0.4 FI
02/20/25	09:00	0.0 FID	0.001 FI	0.0 F	-17.1 FI	0.0 FID	0.001 FI	0.0 F	-0.1 FI
02/20/25	10:00	0.0 FID	0.001 FI	0.0 F	-15.5 FI	0.1 FID	0.001 FI	0.0 F	-0.4 FI
02/20/25	11:00	0.0 FID	0.001 FI	0.0 F	-16.2 FI	0.1 FID	0.001 FI	0.0 F	-0.9 FI
02/20/25	12:00	0.0 FID	0.001 FI	0.0 F	-16.1 FI	0.0 FID	0.001 FI	0.0 F	-0.2 FI
02/20/25	13:00	44.3 U	0.091 E	20.8	40.8 E	67.4 EU	0.110 E	31.7	29.8 E
02/20/25	14:00	3.1 U	0.003	3.1	1.6	15.4 U	0.017	15.4	4.5
02/20/25	15:00	21.8	0.029	21.8	12.6	12.7	0.016	12.7	4.4
02/20/25	16:00	24.4	0.034	24.4	15.2	12.7	0.016	12.7	4.5
02/20/25	17:00	32.0	0.039	32.0	17.6	15.5	0.019 E	15.5	5.1 E
02/20/25	18:00	59.1 EU	0.087 E	36.7	39.0 E	45.4 EU	0.057 E	28.1	15.5 E
02/20/25	19:00	27.7 UD	0.076 E	17.5	33.8 E	20.7 EUD	0.036 E	13.0	9.8 E
02/20/25	20:00	25.1 UD	0.031	25.1	13.9	44.6 EUD	0.063 E	44.6	17.0 E
02/20/25	21:00	66.6 ED	0.210 E	26.6	94.3 E	34.1 ED	0.082 E	13.6	22.4 E
02/20/25	22:00	0.0 FID	0.001 FI	0.0 F	-19.1 FI	0.0 FID	0.001 FI	0.0 F	-0.6 FI
02/20/25	23:00	0.0 FID	0.001 FI	0.0 F	-16.5 FI	0.0 FID	0.001 FI	0.0 F	-0.1 FI

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

* = Suspect

Report Generated: 02/28/25 10:44

Report Version 6.0

19.96 Total Lbs excess NOx

Average Data

Plant: Midway Sunset

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 02/20/2025 00:00 Through 02/20/2025 23:59

Time Online Criteria: 1 minute(s)

Average	30.8	0.076	18.4	34.0	28.1	0.047	20.7	12.8
Minimum	3.1	0.003	3.1	1.6	9.9	0.016	0.8	4.4
Maximum	79.2	0.313	38.7	140.7	67.4	0.115	44.6	31.0
Summation	523.3	1.291	312.8	577.3	478.2	0.800	352.0	217.6
Geometric Mean	22.6	0.038	14.8	17.0	24.5	0.038	16.1	10.4
Included Data Points	17	17	17	17	17	17	17	17
Total number of Data Points	24	24	24	24	24	24	24	24

F = Unit Offline

E = Exceedance

C = Calibration

M = Maintenance

T = Out Of Control

*** = Suspect**

Report Generated: 02/28/25 10:44

Report Version 6.0



CC:2273

**SAN JOAQUIN VALLEY
Air Pollution Control District
TITLE V
DEVIATION REPORTING**

Company Name: Midway Sunset Cogeneration Company
Facility ID #: S-1135

DEVIATION

1. Permit Unit and Condition #:

Facility Permit S-1135-0-5; Condition 5.
Unit B PTO S-1135-225-29; Conditions 21, 55, and 65.

2. Description of Permit Condition:

Facility PTO S-1135-0-5;
Condition 5. The permittee must comply with all conditions of the permit...

Unit B PTO S-1135-225-29;

Condition 21. Permittee shall comply with the following emission limit at all times except during periods of start-up, shutdown, or reduced load...

Condition 55. All equipment, facilities and systems...shall at all times be maintained in good working order...

Condition 65. The permittee must construct and operate the proposed power plant in compliance with...applicable Federal, State, and local air quality regulations.

3. Date, time and duration of deviation:

March 4, 2025, 0039 PST - March 4, 2025, 0059 PST (20 minutes.)

4. Description of deviation: (Includes excess emissions if applicable)

Unit B experienced two Primary Re-ignitions resulting in an exceedance of our Primary Re-ignition Hourly Emissions limits.

March 4, 2025, 0000 Hour (one hour excess emissions):

NOxppmc permitted: 15
NOxppmc recorded: 21.1

MSCC is addressing this event as a breakdown and respectfully requests "Breakdown Relief" from the District.

5. Date and time when deviation was discovered:

March 4, 2025, 0103 PST.

6. Probable cause of deviation:

MSCC's Unit B was operating on Automatic Generation Control (AGC) at minimum load, per CAISO dispatch. CAISO was making multiple small movements up and down which in turn caused a Primary Re-ignition. The Mark VI controls properly corrected this first Primary Re-ignition through the High Load Transfer (HLT) programming. While the unit was tuning after correction, it experienced another Primary Re-ignition. Due to Mark VI configuration, HLT did not attempt to correct this second Primary Re-ignition. HLT is programmed to wait 10 minutes between attempting to correct a Primary Re-ignition. The operator was therefore required to manually lower load, reset the Mark VI controls and raise load back up. Two Primary Re-ignitions in a single hour and the additional time spent at reduced load to reset and return to schedule, caused an exceedance in the 0000 hour.

7. Comments/corrective action taken:

MSCC, along with G. E. Vernova, have identified a problem that caused Inlet Guide Vane (IGV) oscillations and are currently reviewing what actions can be implemented to correct the issue.

COMPLIANCE CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the reporting package is true, accurate, and complete.

Sincerely,



Lowell Pollema
Executive Director

March 12, 2025
661-768-3020

cc: File CC-2273
G. Jans
G. Davis
S. Urias

Submitted using PAS Facility Portal:
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308



April 7, 2025

CC-2276

Kobi Blomberg
Air Quality Inspector
SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Subject: Rescind March 29, 2025, Permit S-1135-224-30 Notification Report

Dear Kobi,

On Saturday, March 29, 2025 at 0305 hours, MSCC Operator Mechanic 1 noticed that the CEMS server was not recording 1 minute data for Unit A. Out of an abundance of caution the operator was instructed to call in a breakdown to the district.

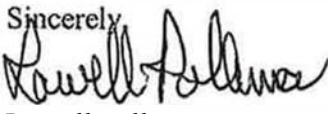
An operator was dispatched to investigate and discovered the status lights on the fiber optic converter were not lit.

On Saturday, March 29, 2025 at 1400 instrumentation staff was onsite to investigate the communication issue. A bad fiber optic cable was discovered. They switched the connection to a spare fiber optic pair and communication was reestablished. It was then verified that all one minute and hourly data was on the ESC server.

Since there was no data lost during this event and no excess emissions occurred, MSCC respectfully rescinds the Saturday, March 29, 2025 Notification Report concerning the Unit A data transmission issue and apologizes for any inconvenience to the district.

If you have any questions or comments, please contact Greg Jans at 661-768-3018 or Greg Davis at 661-768-3028.

I declare, that, based on information and belief formed after reasonable inquiry, the information provided in this letter is true, accurate and complete.

Sincerely,

Lowell Pollema
Executive Director

cc: File CC-2276
G. Jans
G. Davis
S. Urias
S. Parks

UNIT A
CEM MAINTENANCE LOG

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164137

DATE: January 17, 2025

Name: Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, Nox High

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 17, 2025

CEMS Time 08:19 PST

Clock Time 08:19 PST

Switched out of maintenance January 17, 2025

CEMS Time 08:29 PST

Clock Time 08:29 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

08:00PST Obtain work authorization from control room, tailboard job and JSA

08:19PST Put CEMS into maintenance

08:24PST Changed depleted cylinder, Nox High

08:29PST Took CEMS out of maintenance

08:29PST Manual calibration started

08:55PST Calibration completed and passed

09:00PST Notified control room that job was complete



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5700 S. Alameda Street
Los Angeles CA 90058
Tel: 323-585-2154
Fax: 714-542-6689
PGVP ID: F22024

DocNumber: 581397

Unit A 11/17/25

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/08/2024

Linde Order Number: 72948560

Part Number: NI NO135E-AS

Customer PO Number: 80963678

Fill Date: 09/24/2024

Lot Number: 70086426809

Cylinder Style & Outlet: AS

Cylinder Pressure and Volume: 2000 psig

CGA 660

140 ft3

Certified Concentration

Expiration Date:	10/08/2032	NIST Traceable
Cylinder Number:	DT0044130	Expanded Uncertainty
133.9 ppm	Nitric oxide	± 1.1 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only:

NOx 134.2 ppm

Certification Information:

Certification Date: 10/08/2024

Term: 96 Months

Expiration Date: 10/08/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Nitric oxide

Requested Concentration: 135 ppm
Certified Concentration: 133.9 ppm
Instrument Used: Thermo Electron 42i-HL S/N 1030545087
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 09/23/2024

Reference Standard:

Type / Cylinder #: GMIS / ND8831

Concentration / Uncertainty: 99.0 ppm ±0.8 ppm

Expiration Date: 08/20/2032

Traceable to: SRM # / Sample # / Cylinder #: 1684b / 44-U-07 / FF55557

SRM Concentration / Uncertainty: 98.95 ppm / ±0.79 ppm

SRM Expiration Date: 09/14/2025

First Analysis Data:				Date	10/01/2024
Z:	C	R:	99	C:	134
R:	99	Z:	0	C:	133.9
Z:	0	C:	134	R:	99
UOM: ppm				Mean Test Assay:	134 ppm

Second Analysis Data:				Date	10/08/2024
Z:	0	R:	99	C:	133.9
R:	99	Z:	0	C:	133.7
Z:	0	C:	133.8	R:	99
UOM: ppm				Mean Test Assay:	133.8 ppm

Analyzed By

Suchana Gurung

Certified By

Lisette Morales

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164121

DATE: January 22, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Replace depleted bottles; O2 and NOx Low

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 22, 2025

CEMS Time 09:08 PST

Clock Time 09:08 PST

Switched out of maintenance January 22, 2025

CEMS Time 09:20 PST

Clock Time 09:20 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

09:00PST Obtain work authorization from control room, tailboard job and JSA

09:08PST Put CEMS into maintenance

09:10PST Replace depleted bottles; O2 and NOx Low

09:20PST Took CEMS out of maintenance

09:21PST Auto calibration started

09:46PST Calibration completed and passed

10:00PST Notified control room that job was complete



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DocNumber: 582296



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Los Angeles CA 90058
Tel: 323-585-2154
Fax: 714-542-6689
PGVP ID: F22024

UNIT A 1/22/25

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/25/2024

Linde Order Number: 72961418

Part Number: NI NO9ME-AS

Customer PC Number: 80976671

Fill Date: 10/07/2024

Lot Number: 70086428104

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 ft3

Certified Concentration

Expiration Date:	10/24/2027	NIST Traceable
Cylinder Number:	DT0016119	Expanded Uncertainty
9.09 ppm	Nitric oxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only:

NOx 9.13 ppm

Certification Information:

Certification Date: 10/24/2024

Term: 36 Months

Expiration Date: 10/24/2027

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor $k = 2$. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Nitric oxide

Requested Concentration: 9 ppm
Certified Concentration: 9.09 ppm
Instrument Used: Thermo Electron 42i-LS S/N 1030645077
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 10/14/2024

Reference Standard:

Type / Cylinder#: GMIS / ND7468

Concentration / Uncertainty: 10.42 ppm ± 0.05 ppm

Expiration Date: 04/15/2027

Traceable to: SRM # / Sample # / Cylinder #: PRM / C2268801 / APEX1429266

SRM Concentration / Uncertainty: 10.01 ppm / ± 0.05 ppm

SRM Expiration Date: 09/30/2024

First Analysis Data:				Date	10/17/2024
Z:	0	R:	10.42	C:	9.09
Conc:	9.09				
R:	10.43	Z:	0	C:	9.1
Conc:	9.1				
Z:	0	C:	9.08	R:	10.41
Conc:	9.08				
UOM:	ppm	Mean Test Assay:	9.09	ppm	

Second Analysis Data:				Date	10/24/2024
Z:	0	R:	10.42	C:	9.08
Conc:	9.09				
R:	10.41	Z:	0	C:	9.09
Conc:	9.1				
Z:	0	C:	9.08	R:	10.41
Conc:	9.09				
UOM:	ppm	Mean Test Assay:	9.09	ppm	

Analyzed By

Henry Koung

Certified By

Courtney Zelle



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DocNumber: 581626

UNIT A 1/22/25



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Los Angeles CA 90058
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PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/07/2024

Linde Order Number: 72948560

Part Number: NI OX22.5E-AS

Customer PC Number: 80963678

Fill Date: 10/02/2024

Lot Number: 70086427602

Cylinder Style & Outlet: AS

CGA 590

Cylinder Pressure and Volume: 2000 psig 143 ft3

Certified Concentration

Expiration Date:	10/07/2032	NIST Traceable
Cylinder Number:	DT0016132	Expanded Uncertainty
22.48 %	Oxygen	± 0.06 %
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 10/07/2024

Term: 96 Months

Expiration Date: 10/07/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EP-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor $k = 2$. Do not use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Oxygen

Requested Concentration: 22.5 %

Certified Concentration: 22.48 %

Instrument Used: Siemens Oxymat 6E S/N 7MB20211AA000CA1

Analytical Method: Paramagnetic

Last Multipoint Calibration: 09/30/2024

Reference Standard:

Type / Cylinder #: GMS / DT0040804

Concentration / Uncertainty: 20.86 % ± 0.05 %

Expiration Date: 09/09/2032

Traceable to: SRM # / Sample # / Cylinder #: 2659a / 71-D-23 / CAL015788

SRM Concentration / Uncertainty: 20.720 % ± 0.043 %

SRM Expiration Date: 02/28/2026

First Analysis Data:		Date	
Z:	0	R:	20.86
C:	22.47	Conc:	22.47
R:	20.87	Z:	0
C:	22.49	Conc:	22.49
Z:	0	C:	22.48
R:	20.86	Conc:	22.48
UOM:	%	Mean Test Assay:	22.48 %

Second Analysis Data:		Date	
Z:	0	R:	0
C:	0	Conc:	0
R:	0	Z:	0
C:	0	Conc:	0
Z:	0	C:	0
R:	0	Conc:	0
UOM:	%	Mean Test Assay:	%

Analyzed By

Miriam Bahena

Certified By

Nelson Ma

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 162810

DATE: January 23, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Perform Calibration Gas Audit

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 23, 2025

CEMS Time 08:20 PST

Clock Time 08:20 PST

Switched out of maintenance January 23, 2025

CEMS Time 09:52 PST

Clock Time 09:52 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

08:00PST Obtain work authorization from control room, tailboard job and JSA

08:20PST Put CEMS into maintenance

08:24PST Performed Calibration Gas Audit

09:52PST Took CEMS out of maintenance

09:53PST Auto calibration started

10:17PST Calibration completed and passed

10:30PST Notified control room that job was complete

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164195

DATE: January 30, 2025

Name: Bryan Taylor/ Greg T Davis

REASON FOR CEMS SERVICE: Replace depleted bottle, Nitrogen

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 30, 2025

CEMS Time 06:04 PST

Clock Time 06:04 PST

Switched out of maintenance January 30, 2025

CEMS Time 06:09 PST

Clock Time 06:09 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:00PST Obtain work authorization from control room, tailboard job and JSA

06:04PST Put CEMS into maintenance

06:05PST Replace depleted bottle; Nitrogen

06:09PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



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5700 S. Alameda Street
Los Angeles, CA 90058
Tel: 323-585-2154
Fax: 714-542-6689

Customer & Order Information:

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD,
BAKERSFIELD, CA 93308-4919

Linde Order Number: **72990607**
Customer PO Number: **81006194**

Certificate Issuance Date: **11/11/2024**

Revision Number: **0**

Certification Date: **11/8/2024**

Lot Number: **N70086429101**

Part Number: **NI 5.5CE-AS**

DocNumber: **795428**

UNIT A 1/30/25

CERTIFICATE OF ANALYSIS

Nitrogen, 5.5 Continuous Emission Monitoring Zero

Analytes	Specification	Analytical Results	Analytical Reference	Analytical Uncertainty
Nitrogen	≥ 99.9995 %	≥ 99.9995 %	5	N/A
Carbon Dioxide	≤ 1 ppm	≤ 0.5 ppm	3	± 10%
Carbon Monoxide	≤ 0.5 ppm	≤ 0.5 ppm	3	± 15%
Total Hydrocarbons	≤ 0.1 ppm	≤ 0.1 ppm	6	± 15%
Oxides of Nitrogen	≤ 0.1 ppm	≤ 0.1 ppm	7	± 15%
Oxygen	≤ 0.5 ppm	≤ 0.5 ppm	2	± 15%
Sulfur Dioxide	≤ 0.1 ppm	≤ 0.1 ppm	1	± 15%
Water	≤ 2 ppm	≤ 1.5 ppm	4	± 10%

Cylinder Style: **AS**

Fill Date: **10/17/2024**

Filling Method: **Pressure/Temperature**

Cylinder Pressure @ 70 F: **2000 psig**

Analysis Date: **10/22/2024**

Cylinder Volume: **142 ft3**

Valve Outlet Connection: **CGA 580**

Cylinder Number(s): **DT0058200, DT0058331, DT0058145, DT0058415, DT0058172, DT0058342, DT0058126, DT0058168, DT0058340, DT0058196, DT0058125, DT0058141**

Analyzed Cylinder Number(s): **DT0058200**

Analyst: *Amalia Real*
Amalia Real

Approved Signer: *Ying Yu*
Ying Yu

Key to Analytical Techniques:

Reference	Analytical Instrument - Analytical Principle
1	Ametek 921CE S/N AW-921-S321 - UV Spectrometry
2	Delta F DF-550 Nanotrace - Electrolytic Cell/Electrochemical
3	Horiba Instruments Inc. GA-360E - NDIR
4	Meeco Aquavolt PLUS - Specific Water Analyzer
5	N/A - By Difference of Typical Impurities
6	Rosemount/Beckman 400A - FID Total Hydrocarbon Analyzer
7	Thermo Electron 42i-LS S/N 1030645077 - Chemiluminescence

This analysis of the product described herein was prepared by Linde Gas & Equipment Inc. using instruments whose calibration is certified using Linde Gas & Equipment Inc. Reference Materials which are traceable to the International System of Units (SI) through either weights traceable to the National Institute of Standards and Technology (NIST) or Measurement Canada, or through NIST Standard Reference Materials or equivalent where available.

Note: All expressions for concentration (e.g., % or ppm) are for gas phase, by mole unless otherwise noted. Analytical uncertainty is expressed as a Relative % unless otherwise noted.

IMPORTANT

The information contained herein has been prepared at your request by personnel within Linde Gas & Equipment Inc. While we believe the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any particular purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall liability of Linde Gas & Equipment Inc. arising out of the use of the information contained herein exceed the fee established for providing such information.

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164617

DATE: March 7, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Replace depleted bottle, CO High

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 7, 2025

CEMS Time 06:08 PST

Clock Time 06:08 PST

Switched out of maintenance March 7, 2025

CEMS Time 06:17 PST

Clock Time 06:17 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

05:55PST Obtain work authorization from control room, tailboard job and JSA

06:08PST Put CEMS into maintenance

06:09PST Replace depleted bottle; CO High

06:17PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



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DocNumber: 568126

UNIT A 3/7/25



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Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 03/06/2024

Linde Order Number: 72726439

Part Number: NI CO90ME-AS

Customer PO Number: 80738830

Fill Date: 02/26/2024

Lot Number: 70086405702

Cylinder Style & Outlet: AS

CGA 350

Cylinder Pressure and Volume: 2000 psig 139 ft³

Certified Concentration

Expiration Date:	03/05/2032	NIST Traceable
Cylinder Number:	EB0014169	Expanded Uncertainty
91.2 ppm	Carbon monoxide	± 0.8 ppm
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 03/05/2024

Term: 96 Months

Expiration Date: 03/05/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Carbon monoxide

Requested Concentration: 90 ppm

Certified Concentration: 91.2 ppm

Instrument Used: Horiba VIA-510 S/N 576876015

Analytical Method: NDIR

Last Multipoint Calibration: 02/28/2024

First Analysis Data:				Date	03/05/2024
Z:	0	R:	100.1	C:	91.3
Conc:	91.3				
R:	100.1	Z:	0	C:	91.3
Conc:	91.3				
Z:	0	C:	91.2	R:	100.2
Conc:	91.2				
UOM:	ppm	Mean Test Assay:	91.2	ppm	

Reference Standard:

Type / Cylinder #: NTRM / CC9288

Concentration / Uncertainty: 100.1 ppm ±0.8 ppm

Expiration Date: 07/09/2027

Traceable to: SRM # / Sample # / Cylinder #: NTRM / 190703 / CC8737

SRM Concentration / Uncertainty: 100.1 ppm / ±0.8ppm

SRM Expiration Date: 07/09/2027

Second Analysis Data:				Date	
Z:	0	R:	0	C:	0
Conc:	0				
R:	0	Z:	0	C:	0
Conc:	0				
Z:	0	C:	0	R:	0
Conc:	0				
UOM:	ppm	Mean Test Assay:		ppm	

Analyzed By

Courtney Zielke

Certified By

Miriam Bahena

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164629

DATE: March 14, 2025

Name: Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, NoX High

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 14, 2025

CEMS Time 05:21 PST

Clock Time 06:21 PST

Switched out of maintenance March 14, 2025

CEMS Time 05:32 PST

Clock Time 06:32 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

04:55PST Obtain work authorization from control room, tailboard job and JSA

05:21PST Put CEMS into maintenance

05:25PST Changed depleted cylinder, NoX High

05:32PST Took CEMS out of maintenance

06:17PST Auto calibration started

06:41PST Calibration completed and passed

07:00PST Notified control room that job was complete



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Fax: 714-542-6689
PGVP ID: F22024

DocNumber: 582063

9/14/24 Unit A

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/22/2024

Linde Order Number: 72961418

Part Number: NI NO135E-AS

Customer PO Number: 80976671

Fill Date: 10/07/2024

Lot Number: 70086428105

Cylinder Style & Outlet: AS

Cylinder Pressure and Volume: 2000 psig 140 ft³

CGA 660

Certified Concentration

Expiration Date:	10/22/2032	NIST Traceable
Cylinder Number:	CC246313	Expanded Uncertainty
133.2 ppm	Nitric oxide	± 1.1 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only: NOx 133.5 ppm

Certification Information: Certification Date: 10/22/2024 Term: 96 Months Expiration Date: 10/22/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor $k = 2$. Do not use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Certificate)

1. Component: Nitric oxide
Requested Concentration: 135 ppm
Certified Concentration: 133.2 ppm
Instrument Used: Thermo Electron 42i-HL S/N 1030545087
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 10/04/2024

Reference Standard: Type / Cylinder#: GMIS / ND8831
Concentration / Uncertainty: 99.0 ppm ± 0.8 ppm
Expiration Date: 08/20/2032
Traceable to: SRM # / Sample # / Cylinder#: 1684b / 44-U-07 / FF55557
SRM Concentration / Uncertainty: 98.95 ppm / ± 0.79 ppm
SRM Expiration Date: 09/14/2025

First Analysis Data:				Date 10/15/2024	
Z:	0	R:	99	C:	133.1
R:	99	Z:	0	C:	133.3
Z:	0	C:	133.2	R:	99
UOM: ppm				Mean Test Assay: 133.2 ppm	

Second Analysis Data:				Date 10/22/2024	
Z:	0	R:	99	C:	133.3
R:	99	Z:	0	C:	133.1
Z:	0	C:	133.1	R:	99
UOM: ppm				Mean Test Assay: 133.2 ppm	

Analyzed By

Lissette Morales

Certified By

Suchana Gurung

Information contained herein has been prepared at your request by qualified experts within Linde Gas & Equipment Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Linde Gas & Equipment Inc. arising out of the use of the information contained herein exceed the fee established for providing such information.

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164635, 163614, 163473, 163477

DATE: March 19, 2025

Name: Bryan Taylor/Greg T Davis

REASON FOR CEMS SERVICE: Annual maintenance. Changed catalyst tubes, filters, descant, and pumps.

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 19, 2025

CEMS Time 09:00 PST
Clock Time 10:00 PDT

Switched out of maintenance March 19, 2025

CEMS Time 11:54 PST
Clock Time 12:54 PDT

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

<u>Corrective action taken and work done</u>	<u>Time in CEMS time</u>	<u>Pacific Standard Time</u>
--	--------------------------	------------------------------

08:55PST	Obtain work authorization from control room, tailboard job and JSA	
----------	--	--

09:00PST	Put CEMS into maintenance	
----------	---------------------------	--

09:05PST	Annual maintenance. Changed catalyst tubes, filters, descant, and pumps.	
----------	--	--

11:54PST	Took CEMS out of maintenance	
----------	------------------------------	--

12:08PST	Auto calibration started	
----------	--------------------------	--

12:33PST	Calibration completed and passed	
----------	----------------------------------	--

13:00PST	Notified control room that job was complete	
----------	---	--

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164645

DATE: March 22, 2025

Name: Greg T Davis/Greg Davis

REASON FOR CEMS SERVICE: Troubleshooting. Replaced components and calibrated. Replaced depleted gas cylinders O2 and NOX Low.

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 22, 2025

CEMS Time 08:15 PST

Clock Time 09:15 PST

Switched out of maintenance March 22, 2025

CEMS Time 14:01 PST

Clock Time 15:01 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

08:00PST Obtain work authorization from control room, tailboard job and JSA

08:15PST Put CEMS into maintenance

08:16PST Troubleshooting. Replaced components and calibrated. Replaced depleted gas cylinders O2 and NOX Low

14:01PST Took CEMS out of maintenance

14:02PST Auto calibration started

14:31PST Calibration completed and passed

14:32PST Notified control room that job was complete



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DocNumber: 581625

Unit 14
3-22-25



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Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/07/2024
Linde Order Number: 72948560
Part Number: NI OX22.5E-AS
Customer PO Number: 80963678

Fill Date: 10/02/2024
Lot Number: 70086427602
Cylinder Style & Outlet: AS CGA 590
Cylinder Pressure and Volume: 2000 psig 143 ft3

Certified Concentration

Expiration Date:	10/07/2032	NIST Traceable
Cylinder Number:	EB0119066	Expanded Uncertainty
22.41 %	Oxygen	± 0.06 %
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 10/07/2024

Term: 96 Months

Expiration Date: 10/07/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor $k = 2$. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Oxygen

Requested Concentration: 22.5 %
Certified Concentration: 22.41 %
Instrument Used: Siemens Oxymat 6E S/N 7MB20211AA000CA1
Analytical Method: Paramagnetic
Last Multipoint Calibration: 09/30/2024

Reference Standard: Type / Cylinder #: GMIS / DT0040804
Concentration / Uncertainty: 20.86 % ± 0.05 %
Expiration Date: 09/09/2032
Traceable to: SRM # / Sample # / Cylinder #: 2659a / 71-D-23 / CAL015788
SRM Concentration / Uncertainty: 20.720 % / ± 0.043%
SRM Expiration Date: 02/28/2026

First Analysis Data:				Date
Z:	0	R:	20.86	10/07/2024
R:	20.87	Z:	0	
Z:	0	C:	22.42	
C:	22.42	R:	20.86	
UOM:	%	Mean Test Assay:	22.41	%

Second Analysis Data:				Date
Z:	0	R:	0	
R:	0	Z:	0	
Z:	0	C:	0	
C:	0	R:	0	
UOM:	%	Mean Test Assay:		%

Analyzed By

Miriam Bahena

Certified By

Nelson Ma



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DocNumber: 575361

Unit A
3-22-25



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CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 06/28/2024

Linde Order Number: 72850603

Part Number: NI NO9ME-AS

Customer PO Number: 80864531

Fill Date: 06/17/2024

Lot Number: 70086416902

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 ft³

Certified Concentration

Expiration Date:	06/28/2027	NIST Traceable
Cylinder Number:	CC755209	Expanded Uncertainty
9.12 ppm	Nitric oxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only:

NOx 9.18 ppm

Certification Information:

Certification Date: 06/28/2024

Term: 36 Months

Expiration Date: 06/28/2027

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Nitric oxide

Requested Concentration: 9 ppm
Certified Concentration: 9.12 ppm
Instrument Used: Thermo Electron 42i-LS S/N 1030645077
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 06/11/2024

Reference Standard:

Type / Cylinder #: GMIS / ND7468

Concentration / Uncertainty: 10.42 ppm ± 0.05 ppm

Expiration Date: 04/15/2027

Traceable to: SRM # / Sample # / Cylinder #: PRM / C2268801 / APEX1429266

SRM Concentration / Uncertainty: 10.01 ppm / ± 0.05 ppm

SRM Expiration Date: 09/30/2024

First Analysis Data:				Date	06/21/2024
Z:	0	R:	10.42	C:	9.14
Conc:	9.14				
R:	10.43	Z:	0	C:	9.13
Conc:	9.13				
Z:	0	C:	9.13	R:	10.41
Conc:	9.13				
UOM:	ppm	Mean Test Assay:		9.13	ppm

Second Analysis Data:				Date	06/28/2024
Z:	0	R:	10.42	C:	9.12
Conc:	9.13				
R:	10.4	Z:	0	C:	9.1
Conc:	9.11				
Z:	0	C:	9.1	R:	10.42
Conc:	9.11				
UOM:	ppm	Mean Test Assay:		9.11	ppm

Analyzed By

Henry Koung

Certified By

Courtney Zielke

UNIT A CEMS MAINTENANCE LOG

MSCC Work Number: 164638

DATE: March 24, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, CO₂, CO Low and Nitrogen

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 24, 2025

CEMS Time 05:04 PST

Clock Time 06:04 PST

Switched out of maintenance March 24, 2025

CEMS Time 05:23 PST

Clock Time 06:23 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

04:55PST Obtain work authorization from control room, tailboard job and JSA

05:04PST Put CEMS into maintenance

05:05PST Changed depleted cylinders, CO₂, CO Low and Nitrogen

05:23PST Took CEMS out of maintenance

06:17PST Auto calibration started

06:41PST Calibration completed and passed

07:00PST Notified control room that job was complete



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DocNumber: 579415

UNIT A 3/24/25



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CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 08/26/2024

Linde Order Number: 72901490

Part Number: NI CD18E-AS

Customer PG Number: 80916039

Fill Date: 08/08/2024

Lot Number: 70086422106

Cylinder Style & Outlet: AS

CGA 580

Cylinder Pressure and Volume: 2000 psig 152 ft3

Certified Concentration

Expiration Date:	08/26/2032	NIST Traceable
Cylinder Number:	CC255129	Expanded Uncertainty
18.09 %	Carbon dioxide	± 0.16 %
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 08/26/2024

Term: 96 Months

Expiration Date: 08/26/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor $k = 2$. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Carbon dioxide

Requested Concentration: 18 %
Certified Concentration: 18.09 %
Instrument Used: Horiba VIA-510 S/N 20C194WK
Analytical Method: NDIR
Last Multipoint Calibration: 08/19/2024

Reference Standard: Type / Cylinder #: NTRM / CC725984

Concentration / Uncertainty: 19.34 % ± 0.16 %

Expiration Date: 01/12/2027

Traceable to: SRM # / Sample # / Cylinder #: NTRM / 190701 / CC725973

SRM Concentration / Uncertainty: 19.34% / ± 0.16%

SRM Expiration Date: 01/12/2027

First Analysis Data:				Date	08/26/2024		
Z:	0	R:	19.34	C:	18.11	Conc:	18.08
R:	19.39	Z:	0	C:	18.13	Conc:	18.1
Z:	0	C:	18.11	R:	19.38	Conc:	18.08
UOM: %				Mean Test Assay: 18.09 %			

Second Analysis Data:				Date			
Z:	0	R:	0	C:	0	Conc:	0
R:	0	Z:	0	C:	0	Conc:	0
Z:	0	C:	0	R:	0	Conc:	0
UOM: %				Mean Test Assay: %			

Analyzed By

Amelia Real

Certified By

Miriam Bahena

Information contained herein has been prepared at your request by qualified experts within Linde Gas & Equipment Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Linde Gas & Equipment Inc., arising out of the use of the information contained herein, exceed the fee established for providing such information.



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UNIT A 3/24/25

Customer & Order Information:

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD,
BAKERSFIELD, CA 93308-4919
Linde Order Number: **72976581**
Customer PO Number: **80991977**

Certificate Issuance Date: **10/30/2024**
Revision Number: **0**
Certification Date: **10/30/2024**
Lot Number: **N70086429901**
Part Number: **NI 5.5CE-AS**
DocNumber: **793204**

CERTIFICATE OF ANALYSIS

Nitrogen, 5.5 Continuous Emission Monitoring Zero

Analytes	Specification	Analytical Results	Analytical Reference	Analytical Uncertainty
Nitrogen	≥ 99.9995 %	≥ 99.9995 %	5	N/A
Carbon Dioxide	≤ 1 ppm	≤ 0.5 ppm	3	± 10%
Carbon Monoxide	≤ 0.5 ppm	≤ 0.5 ppm	3	± 15%
Total Hydrocarbons	≤ 0.1 ppm	≤ 0.1 ppm	6	± 15%
Oxides of Nitrogen	≤ 0.1 ppm	≤ 0.1 ppm	7	± 15%
Oxygen	≤ 0.5 ppm	≤ 0.5 ppm	2	± 15%
Sulfur Dioxide	≤ 0.1 ppm	≤ 0.1 ppm	1	± 15%
Water	≤ 2 ppm	≤ 1.5 ppm	4	± 10%

Cylinder Style: **AS** Fill Date: **10/25/2024** Filling Method: **Pressure/Temperature**
Cylinder Pressure @ 70 F: **2000 psig** Analysis Date: **10/30/2024**
Cylinder Volume: **142 ft³**
Valve Outlet Connection: **CGA 580**
Cylinder Number(s): **CC110533, CC9055, CC102888, DT0036735, SA17845, CC34052**
Analyzed Cylinder Number(s): **CC110533**

Analyst: **Amalia Real**

Approved Signer: **Ying Yu**

Key to Analytical Techniques:

Reference	Analytical Instrument - Analytical Principle
1	Ametek 921CE S/N AW-921-S321 - UV Spectrometry
2	Delta F DF-550 Nanotrace - Electrolytic Cell/Electrochemical
3	Horiba Instruments Inc. GA-360E - NDIR
4	Meeco Aquavolt PLUS - Specific Water Analyzer
5	N/A - By Difference of Typical Impurities
6	Rosemount/Beckman 400A - FID Total Hydrocarbon Analyzer
7	Thermo Electron 42i-LS S/N 1030645077 - Chemiluminescence

This analysis of the product described herein was prepared by Linde Gas & Equipment Inc. using instruments whose calibration is certified using Linde Gas & Equipment Inc. Reference Materials which are traceable to the International System of Units (SI) through either weights traceable to the National Institute of Standards and Technology (NIST) or Measurement Canada, or through NIST Standard Reference Materials or equivalent where available.

Note: All expressions for concentration (e.g., % or ppm) are for gas phase, by mole unless otherwise noted. Analytical uncertainty is expressed as a Relative % unless otherwise noted.

IMPORTANT

The information contained herein has been prepared at your request by personnel within Linde Gas & Equipment Inc. While we believe the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any particular purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall liability of Linde Gas & Equipment Inc. arising out of the use of the information contained herein exceed the fee established for providing such information.



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PGVP ID: F22024

DocNumber: 579918

UNIT A 3/24/25

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 09/05/2024

Linde Order Number: 72901490

Part Number: NI CO9ME-AS

Customer PO Number: 80916039

Fill Date: 08/12/2024

Lot Number: 70086422503

Cylinder Style & Outlet: AS

CGA 350

Cylinder Pressure and Volume: 2000 psig 145 ft³

Certified Concentration

Expiration Date:	08/30/2032	NIST Traceable
Cylinder Number:	DT0022796	Expanded Uncertainty
9.43 ppm	Carbon monoxide	± 0.07 ppm
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 08/30/2024

Term: 96 Months

Expiration Date: 08/30/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor $k = 2$. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Carbon monoxide

Requested Concentration: 9 ppm
Certified Concentration: 9.43 ppm
Instrument Used: Horiba VIA-510 S/N 43627990042
Analytical Method: NDIR
Last Multipoint Calibration: 08/30/2024

Reference Standard: Type / Cylinder #: GMIS / DT0014643

Concentration / Uncertainty: 10.04 ppm ± 0.05 ppm

Expiration Date: 08/16/2030

Traceable to: SRM # / Sample # / Cylinder #: 1677C / 5-J-42 / CAL015337

SRM Concentration / Uncertainty: 9.825 / ± 0.047

SRM Expiration Date: 06/24/2024

First Analysis Data:				Date	08/30/2024
Z:	2.1	R:	96	C:	90
Conc:	9.41				
R:	95.7	Z:	2.2	C:	90.3
Conc:	9.44				
Z:	2.2	C:	90.2	R:	95.9
Conc:	9.43				
UOM:	mV	Mean Test Assay:	9.43	ppm	

Second Analysis Data:				Date	
Z:	0	R:	0	C:	0
Conc:	0				
R:	0	Z:	0	C:	0
Conc:	0				
Z:	0	C:	0	R:	0
Conc:	0				
UOM:	mV	Mean Test Assay:		ppm	

Analyzed By

Miriam Bahena

Certified By

Nelson Ma

UNIT B
CEM MAINTENANCE LOG

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164100

DATE: January 14, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, Nox Low

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 14, 2025

CEMS Time 06:24 PST

Clock Time 06:24 PST

Switched out of maintenance January 14, 2025

CEMS Time 06:32 PST

Clock Time 06:32 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:15PST Obtain work authorization from control room, tailboard job and JSA

06:24PST Put CEMS into maintenance

06:26PST Changed depleted cylinder Nox Low

06:32PST Took CEMS out of maintenance

07:19PST Auto calibration started

07:42PST Calibration completed and passed

08:00PST Notified control room that job was complete



DocNumber: 582297

UNIT B 1/14/25



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PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/25/2024

Linde Order Number: 72961418

Part Number: NI NO9ME-AS

Customer PO Number: 80976671

Fill Date: 10/07/2024

Lot Number: 70086428104

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 ft³

Certified Concentration

Expiration Date:	10/24/2027	NIST Traceable
Cylinder Number:	DT0009771	Expanded Uncertainty
9.09 ppm	Nitric oxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only:

NOx 9.14 ppm

Certification Information:

Certification Date: 10/24/2024

Term: 36 Months

Expiration Date: 10/24/2027

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k=2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Nitric oxide

Requested Concentration: 9 ppm

Certified Concentration: 9.09 ppm

Instrument Used: Thermo Electron 42i-LS S/N 1030645077

Analytical Method: Chemiluminescence

Last Multipoint Calibration: 10/14/2024

Reference Standard:

Type / Cylinder #: GMIS / ND7468

Concentration / Uncertainty: 10.42 ppm ±0.05 ppm

Expiration Date: 04/15/2027

Traceable to: SRM # / Sample # / Cylinder #: PRM / C2268801 / APEX1429266

SRM Concentration / Uncertainty: 10.01 ppm ±0.05 ppm

SRM Expiration Date: 09/30/2024

First Analysis Data:				Date	10/17/2024
Z:	0	R:	10.42	C:	9.09
Conc:	9.09				
R:	10.43	Z:	0	C:	9.08
Conc:	9.08				
Z:	0	C:	9.08	R:	10.41
Conc:	9.08				
UOM:	ppm	Mean Test Assay:		9.08	ppm

Second Analysis Data:				Date	10/24/2024
Z:	0	R:	10.42	C:	9.1
Conc:	9.11				
R:	10.41	Z:	0	C:	9.09
Conc:	9.1				
Z:	0	C:	9.08	R:	10.41
Conc:	9.09				
UOM:	ppm	Mean Test Assay:		9.1	ppm

Analyzed By

Henry Koung

Certified By

Courtney Zielke

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164138

DATE: January 17, 2025

Name: Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, Nitrogen

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 17, 2025

CEMS Time 08:32 PST

Clock Time 08:32 PST

Switched out of maintenance January 17, 2025

CEMS Time 08:37 PST

Clock Time 08:37 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

08:00PST Obtain work authorization from control room, tailboard job and JSA

08:32PST Put CEMS into maintenance

08:34PST Changed depleted cylinder, Nitrogen

08:37PST Took CEMS out of maintenance

08:38PST Manual calibration started

09:03PST Calibration completed and passed

09:05PST Notified control room that job was complete



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Unit B 1/17/25

Customer & Order Information:

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD,
BAKERSFIELD, CA 93308-4919

Linde Order Number: **72990607**

Customer PO Number: **81006194**

Certificate Issuance Date: **11/11/2024**

Revision Number: **0**

Certification Date: **11/8/2024**

Lot Number: **N70086429101**

Part Number: **NI 5.5CE-AS**

DocNumber: **795428**

CERTIFICATE OF ANALYSIS

Nitrogen, 5.5 Continuous Emission Monitoring Zero

Analytes	Specification	Analytical Results	Analytical Reference	Analytical Uncertainty
Nitrogen	≥ 99.9995 %	≥ 99.9995 %	5	N/A
Carbon Dioxide	≤ 1 ppm	≤ 0.5 ppm	3	± 10%
Carbon Monoxide	≤ 0.5 ppm	≤ 0.5 ppm	3	± 15%
Total Hydrocarbons	≤ 0.1 ppm	≤ 0.1 ppm	6	± 15%
Oxides of Nitrogen	≤ 0.1 ppm	≤ 0.1 ppm	7	± 15%
Oxygen	≤ 0.5 ppm	≤ 0.5 ppm	2	± 15%
Sulfur Dioxide	≤ 0.1 ppm	≤ 0.1 ppm	1	± 15%
Water	≤ 2 ppm	≤ 1.5 ppm	4	± 10%

Cylinder Style: **AS**

Fill Date: **10/17/2024**

Filling Method: **Pressure/Temperature**

Cylinder Pressure @ 70 F: **2000 psig**

Analysis Date: **10/22/2024**

Cylinder Volume: **142 ft3**

Valve Outlet Connection: **CGA 580**

Cylinder Number(s): **DT0058200, DT0058331, DT0058145, DT0058415, DT0058172, DT0058342, DT0058126, DT0058168, DT0058340, DT0058196, DT0058125, DT0058141**

Analyzed Cylinder Number(s): **DT0058200**

Analyst: **Amalia Real**

Approved Signer: **Ying Yu**

Key to Analytical Techniques:

Reference	Analytical Instrument - Analytical Principle
1	Ametek 921CE S/N AW-921-S321 - UV Spectrometry
2	Delta F DF-550 Nanotrace - Electrolytic Cell/Electrochemical
3	Horiba Instruments Inc. GA-360E - NDIR
4	Meeco Aquavolt PLUS - Specific Water Analyzer
5	N/A - By Difference of Typical Impurities
6	Rosemount/Beckman 400A - FID Total Hydrocarbon Analyzer
7	Thermo Electron 42i-LS S/N 1030645077 - Chemiluminescence

This analysis of the product described herein was prepared by Linde Gas & Equipment Inc. using instruments whose calibration is certified using Linde Gas & Equipment Inc. Reference Materials which are traceable to the International System of Units (SI) through either weights traceable to the National Institute of Standards and Technology (NIST) or Measurement Canada, or through NIST Standard Reference Materials or equivalent where available.

Note: All expressions for concentration (e.g., % or ppm) are for gas phase, by mole unless otherwise noted. Analytical uncertainty is expressed as a Relative % unless otherwise noted.

IMPORTANT

The information contained herein has been prepared at your request by personnel within Linde Gas & Equipment Inc. While we believe the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any particular purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall liability of Linde Gas & Equipment Inc. arising out of the use of the information contained herein exceed the fee established for providing such information.

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 162810

DATE: January 23, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Perform Calibration Gas Audit

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 23, 2025

CEMS Time 09:50 PST

Clock Time 09:50 PST

Switched out of maintenance January 23, 2025

CEMS Time 11:22 PST

Clock Time 11:22 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

08:00PST Obtain work authorization from control room, tailboard job and JSA

09:50PST Put CEMS into maintenance

09:55PST Performed Calibration Gas Audit

11:22PST Took CEMS out of maintenance

11:27PST Auto calibration started

11:53PST Calibration completed and passed

12:00PST Notified control room that job was complete

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164196

DATE: January 30, 2025

Name: Bryan Taylor/ Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, O2

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 30, 2025

CEMS Time 06:11 PST

Clock Time 06:11 PST

Switched out of maintenance January 30, 2025

CEMS Time 06:17 PST

Clock Time 06:17 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:00PST Obtain work authorization from control room, tailboard job and JSA

06:11PST Put CEMS into maintenance

06:13PST Changed depleted cylinder O2

06:17PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



DocNumber: 577066

UNIT B 1/30/25



Linde Gas & Equipment Inc.
5700 S. Alameda Street
Los Angeles CA 90058
Tel: 323-585-2154
Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS**Customer & Order Information**

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 07/23/2024

Linde Order Number: 72877157

Part Number: NI OX22.5E-AS

Customer PONumber: 80891449

Fill Date: 07/16/2024

Lot Number: 70086419804

Cylinder Style & Outlet: AS

CGA 590

Cylinder Pressure and Volume: 2000 psig 143 ft3

Certified Concentration**ProSpec EZ Cert**

Expiration Date:	07/23/2032	NIST Traceable
Cylinder Number:	CC738132	Expanded Uncertainty
22.53 %	Oxygen	± 0.10 %
Balance	Nitrogen	

**Certification Information:**

Certification Date: 07/23/2024

Term: 96 Months

Expiration Date: 07/23/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Cantidate)

1. Component: Oxygen

Requested Concentration: 22.5 %
Certified Concentration: 22.53 %
Instrument Used: Siemens Oxymat 6E S/N 7MB20211AA000CA1
Analytical Method: Paramagnetic
Last Multipoint Calibration: 06/28/2024

Reference Standard: Type / Cylinder #: GMIS / CC505853

Concentration / Uncertainty: 20.88 % ±0.06 %

Expiration Date: 02/19/2032

Traceable to: SRM # / Sample # / Cylinder #: 2659a / 71-D-23 / CAL015788

SRM Concentration / Uncertainty: 20.720% / ±0.043%

SRM Expiration Date: 02/28/2026

First Analysis Data:		Date	
Z:	0	R:	20.88
R:	20.92	C:	22.56
Z:	0	C:	22.55
UOM:	%	Mean Test Assay:	22.53 %

Second Analysis Data:		Date	
Z:	0	R:	0
R:	0	C:	0
Z:	0	C:	0
UOM:	%	Mean Test Assay:	%

Analyzed By

Miriam Bahena

Certified By

Nelson Ma

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164218

DATE: February 10, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, CO High

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance February 10, 2025

CEMS Time 06:07 PST

Clock Time 06:07 PST

Switched out of maintenance February 10, 2025

CEMS Time 06:14 PST

Clock Time 06:14 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:00PST Obtain work authorization from control room, tailboard job and JSA

06:07PST Put CEMS into maintenance

06:08PST Changed depleted cylinder CO High

06:14PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



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DocNumber: 581423

UNIT B 2/10/25



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PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/02/2024

Linde Order Number: 72948560

Part Number: NI CO90ME-AS

Customer PO Number: 80963678

Fill Date: 09/26/2024

Lot Number: 70086427004

Cylinder Style & Outlet: AS

CGA 350

Cylinder Pressure and Volume: 2000 psig 144 ft3

Certified Concentration

Expiration Date:	10/02/2032	NIST Traceable
Cylinder Number:	SGAL2852	Expanded Uncertainty
90.5 ppm	Carbon monoxide	± 0.7 ppm
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 10/02/2024

Term: 96 Months

Expiration Date: 10/02/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor $k = 2$. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Carbon monoxide

Requested Concentration: 90 ppm
Certified Concentration: 90.5 ppm
Instrument Used: Horiba VIA-510 S/N 576876015
Analytical Method: NDIR
Last Multipoint Calibration: 09/30/2024

Reference Standard: Type / Cylinder #: NTRM / CC12259

Concentration / Uncertainty: 100.1 ppm ± 0.8 ppm

Expiration Date: 07/09/2027

Traceable to: SRM # / Sample # / Cylinder #: NTRM / 190703 / CC8737

SRM Concentration / Uncertainty: 100.1 ppm / ± 0.8 ppm

SRM Expiration Date: 07/09/2027

First Analysis Data:				Date
Z:	0	R:	100.1	C: 90.5
Conc:	90.6			
R:	100.1	Z:	0	C: 90.5
Conc:	90.6			
Z:	0	C:	90.2	R: 99.9
Conc:	90.3			
UOM:	ppm	Mean Test Assay:	90.5	ppm

Second Analysis Data:				Date
Z:	0	R:	0	C: 0
Conc:	0			
R:	0	Z:	0	C: 0
Conc:	0			
Z:	0	C:	0	R: 0
Conc:	0			
UOM:	ppm	Mean Test Assay:		ppm

Analyzed By

Miriam Bahena

Certified By

Nelson Ma

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164237

DATE: February 21, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, Nox High

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance February 21, 2025

CEMS Time 06:01 PST

Clock Time 06:01 PST

Switched out of maintenance February 21, 2025

CEMS Time 06:09 PST

Clock Time 06:09 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

05:50PST Obtain work authorization from control room, tailboard job and JSA

06:01PST Put CEMS into maintenance

06:02PST Changed depleted cylinder Nox High

06:09PST Took CEMS out of maintenance

07:19PST Auto calibration started

07:42PST Calibration completed and passed

08:00PST Notified control room that job was complete



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PGVP ID: F22024

UNIT B 2/21/25

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/08/2024

Linde Order Number: 72948560

Part Number: NI NO135E-AS

Customer PO Number: 80963678

Fill Date: 09/24/2024

Lot Number: 70086426809

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 ft³

Certified Concentration

Expiration Date:	10/08/2032	NIST Traceable
Cylinder Number:	DT0048077	Expanded Uncertainty
134.0 ppm	Nitric oxide	± 1.1 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only:

NOx 134.3 ppm

Certification Information:

Certification Date: 10/08/2024

Term: 96 Months

Expiration Date: 10/08/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol. Document #EPA-00/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Nitric oxide
Requested Concentration: 135 ppm
Certified Concentration: 134.0 ppm
Instrument Used: Thermo Electron 42i-HL S/N 1030545087
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 09/23/2024

Reference Standard: Type / Cylinder #: GMIS / ND8831
Concentration / Uncertainty: 99.0 ppm ± 0.8 ppm
Expiration Date: 08/20/2032
Traceable to: SRM # / Sample # / Cylinder #: 1684b / 44-U-07 / FF55557
SRM Concentration / Uncertainty: 98.95 ppm / ± 0.79 ppm
SRM Expiration Date: 09/14/2025

First Analysis Data:				Date	10/01/2024
Z:	0	R:	99	C:	134
R:	99	Z:	0	C:	134
Z:	0	C:	134.1	R:	99
UOM: ppm				Mean Test Assay:	134 ppm

Second Analysis Data:				Date	10/08/2024
Z:	0	R:	99	C:	134.4
R:	99	Z:	0	C:	133.7
Z:	0	C:	133.5	R:	99
UOM: ppm				Mean Test Assay:	133.9 ppm

Analyzed By

Suchana Gurung

Certified By

Lissette Morales

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164618

DATE: March 7, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, Nitrogen

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 7, 2025

CEMS Time 06:20 PST

Clock Time 06:20 PST

Switched out of maintenance March 7, 2025

CEMS Time 06:25 PST

Clock Time 06:25 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

05:55PST Obtain work authorization from control room, tailboard job and JSA

06:20PST Put CEMS into maintenance

06:21PST Changed depleted cylinder Nitrogen

06:25PST Took CEMS out of maintenance

07:19PST Auto calibration started

07:42PST Calibration completed and passed

08:00PST Notified control room that job was complete



UNIT B 3/7/25



Linde Gas & Equipment Inc.
5700 S. Alameda Street
Los Angeles, CA 90058
Tel: 323-585-2154
Fax: 714-542-6689

Customer & Order Information:

Linde Gas & Equipment Inc.
5700 S. Alameda Street
Los Angeles, CA 90058

Linde Order Number: **72976581**
Customer PO Number: **80991977**

Certificate Issuance Date: **10/30/2024**
Revision Number: **0**
Certification Date: **10/30/2024**
Lot Number: **N70086429901**
Part Number: **NI 5.5CE-AS**
DocNumber: **793204**

CERTIFICATE OF ANALYSIS

Nitrogen, 5.5 Continuous Emission Monitoring Zero

Analytes	Specification	Analytical Results	Analytical Reference	Analytical Uncertainty
Nitrogen	≥ 99.9995 %	≥ 99.9995 %	5	N/A
Carbon Dioxide	≤ 1 ppm	≤ 0.5 ppm	3	± 10%
Carbon Monoxide	≤ 0.5 ppm	≤ 0.5 ppm	3	± 15%
Total Hydrocarbons	≤ 0.1 ppm	≤ 0.1 ppm	6	± 15%
Oxides of Nitrogen	≤ 0.1 ppm	≤ 0.1 ppm	7	± 15%
Oxygen	≤ 0.5 ppm	≤ 0.5 ppm	2	± 15%
Sulfur Dioxide	≤ 0.1 ppm	≤ 0.1 ppm	1	± 15%
Water	≤ 2 ppm	≤ 1.5 ppm	4	± 10%

Cylinder Style: **AS** Fill Date: **10/25/2024** Filling Method: **Pressure/Temperature**
Cylinder Pressure @ 70 F: **2000 psig** Analysis Date: **10/30/2024**
Cylinder Volume: **142 ft³**
Valve Outlet Connection: **CGA 580**
Cylinder Number(s): **CC110533, CC9055, CC102888, DT0036735, SA17845, CC34052**
Analyzed Cylinder Number(s): **CC110533**

Analyst: **Amalia Real**

Approved Signer: **Ying Yu**

Key to Analytical Techniques:

Reference	Analytical Instrument - Analytical Principle
1	Ametek 921CE S/N AW-921-S321 - UV Spectrometry
2	Delta F DF-550 Nanotrace - Electrolytic Cell/Electrochemical
3	Horiba Instruments Inc. GA-360E - NDIR
4	Meeco Aquavolt PLUS - Specific Water Analyzer
5	N/A - By Difference of Typical Impurities
6	Rosemount/Beckman 400A - FID Total Hydrocarbon Analyzer
7	Thermo Electron 42i-LS S/N 1030645077 - Chemiluminescence

This analysis of the product described herein was prepared by Linde Gas & Equipment Inc. using instruments whose calibration is certified using Linde Gas & Equipment Inc. Reference Materials which are traceable to the International System of Units (SI) through either weights traceable to the National Institute of Standards and Technology (NIST) or Measurement Canada, or through NIST Standard Reference Materials or equivalent where available.

Note: All expressions for concentration (e.g., % or ppm) are for gas phase, by mole unless otherwise noted. Analytical uncertainty is expressed as a Relative % unless otherwise noted.

IMPORTANT

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UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164622

DATE: March 12, 2025

Name: Bryan Taylor/Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, NOx Low

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 12, 2025

CEMS Time 05:02 PST

Clock Time 06:02 PST

Switched out of maintenance March 12, 2025

CEMS Time 05:09 PST

Clock Time 06:09 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

04:55PST Obtain work authorization from control room, tailboard job and JSA

05:02PST Put CEMS into maintenance

05:03PST Changed depleted cylinder NOx Low

05:09PST Took CEMS out of maintenance

06:17PST Auto calibration started

06:42PST Calibration completed and passed

07:00PST Notified control room that job was complete



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UNIT B 3/12/25



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Tel: 323-585-2154
Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/25/2024

Linde Order Number: 72961418

Part Number: NI NO9ME-AS

Customer PO Number: 80976671

Fill Date: 10/07/2024

Lot Number: 70086428104

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 ft3

Certified Concentration

Expiration Date:	10/24/2027	NIST Traceable
Cylinder Number:	DT0009807	Expanded Uncertainty
9.04 ppm	Nitric oxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only: NOx 9.07 ppm

Certification Information:

Certification Date: 10/24/2024

Term: 36 Months

Expiration Date: 10/24/2027

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-800/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k=2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Nitric oxide

Requested Concentration: 9 ppm

Certified Concentration: 9.04 ppm

Instrument Used: Thermo Electron 42i-LS S/N 1030645077

Analytical Method: Chemiluminescence

Last Multipoint Calibration: 10/14/2024

Reference Standard: Type / Cylinder #: GMS / ND7468

Concentration / Uncertainty: 10.42 ppm ± 0.05 ppm

Expiration Date: 04/15/2027

Traceable to: SRM # / Sample # / Cylinder #: PRM / C2268801 / APEX1429266

SRM Concentration / Uncertainty: 10.01 ppm / ± 0.05 ppm

SRM Expiration Date: 09/30/2024

First Analysis Data:				Date
Z:	0	R:	10.42	10/17/2024
C:	9.05	Conc:	9.05	
R:	10.43	Z:	0	
C:	9.04	Conc:	9.04	
Z:	0	C:	9.04	
R:	10.41	Conc:	9.04	
UOM: ppm				
Mean Test Assay:				9.04 ppm

Second Analysis Data:				Date
Z:	0	R:	10.42	10/24/2024
C:	9.04	Conc:	9.05	
R:	10.41	Z:	0	
C:	9.03	Conc:	9.04	
Z:	0	C:	9.05	
R:	10.41	Conc:	9.06	
UOM: ppm				
Mean Test Assay:				9.05 ppm

Analyzed By

Henry Koung

Certified By

Courtney Zielke

Information contained herein has been prepared at your request by qualified experts within Linde Gas & Equipment Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Linde Gas & Equipment Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

1 of 1

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164637

DATE: March 21, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, O2, CO Low and CO2

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 21, 2025

CEMS Time 05:01 PST

Clock Time 06:01 PST

Switched out of maintenance March 21, 2025

CEMS Time 05:19 PST

Clock Time 06:19 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

04:55PST Obtain work authorization from control room, tailboard job and JSA

05:01PST Put CEMS into maintenance

05:03PST Changed depleted cylinders, O2, CO Low and CO2

05:19PST Took CEMS out of maintenance

06:17PST Auto calibration started

06:42PST Calibration completed and passed

07:00PST Notified control room that job was complete



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UNIT B 3/21/25



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Tel: 323-585-2154
Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 11/21/2024

Linde Order Number: 72990607

Part Number: NI OX22.5E-AS

Customer PO Number: 81006194

Fill Date: 11/13/2024

Lot Number: 70086431806

Cylinder Style & Outlet: AS

CGA 590

Cylinder Pressure and Volume: 2000 psig 144 ft3

Certified Concentration

Expiration Date:	11/21/2032	NIST Traceable
Cylinder Number:	DT0036150	Expanded Uncertainty
22.60 %	Oxygen	± 0.06 %
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 11/21/2024

Term: 96 Months

Expiration Date: 11/21/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Oxygen

Requested Concentration: 22.5 %

Certified Concentration: 22.60 %

Instrument Used: Siemens Oxymat 6E S/N 7MB20211AA000CA1

Analytical Method: Paramagnetic

Last Multipoint Calibration: 10/31/2024

Reference Standard:

Type / Cylinder #: GMIS / DT0040804

Concentration / Uncertainty: 20.86 % ± 0.05 %

Expiration Date: 09/09/2032

Traceable to: SRM # / Sample # / Cylinder #: 2659a / 71-D-23 / CAL015788

SRM Concentration / Uncertainty: 20.720 % ± 0.043 %

SRM Expiration Date: 02/28/2026

First Analysis Data:				Date	11/21/2024
Z:	0	R:	20.86	C:	22.63
Conc:	22.59	R:	20.9	Z:	0
C:	22.64	C:	22.64	Conc:	22.6
Z:	0	R:	20.92	C:	22.6
Conc:	22.6	UOM:	%	Mean Test Assay:	22.6 %

Second Analysis Data:				Date	
Z:	0	R:	0	C:	0
Conc:	0	R:	0	Z:	0
C:	0	C:	0	Conc:	0
Z:	0	R:	0	C:	0
Conc:	0	UOM:	%	Mean Test Assay:	%

Analyzed By

Miriam Bahena

Certified By

Nelson Ma



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DocNumber: 581971

UNIT B 3/21/25



Linde Gas & Equipment Inc.
5700 S. Alameda Street
Los Angeles CA 90058
Tel: 323-585-2154
Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/11/2024

Linde Order Number: 72961418

Part Number: NI CD18E-AS

Customer PC Number: 80976671

Fill Date: 10/07/2024

Lot Number: 70086428109

Cylinder Style & Outlet: AS

CGA 580

Cylinder Pressure and Volume: 2000 psig 152 ft3

Certified Concentration

Expiration Date:	10/11/2032	NIST Traceable
Cylinder Number:	EB0166378	Expanded Uncertainty
18.03 %	Carbon dioxide	± 0.16 %
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 10/11/2024

Term: 96 Months

Expiration Date: 10/11/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-800/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Carbon dioxide

Requested Concentration: 18 %
Certified Concentration: 18.03 %
Instrument Used: Horiba VIA-510 S/N 20C194WK
Analytical Method: NDIR
Last Multipoint Calibration: 09/20/2024

Reference Standard: Type / Cylinder #: NTRM / CC725981

Concentration / Uncertainty: 19.34 % ± 0.16 %

Expiration Date: 01/12/2027

Traceable to: SRM # / Sample # / Cylinder # NTRM / 190701 / CC725973

SRM Concentration / Uncertainty: 19.34% / ± 0.16%

SRM Expiration Date: 01/12/2027

First Analysis Data:				Date	10/11/2024
Z:	0	R:	19.34	C:	18.04
				Conc:	18.03
R:	19.37	Z:	0	C:	18.04
				Conc:	18.03
Z:	0	C:	18.03	R:	19.33
				Conc:	18.02
UOM:	%	Mean Test Assay:			18.03 %

Second Analysis Data:				Date	
Z:	0	R:	0	C:	0
				Conc:	0
R:	0	Z:	0	C:	0
				Conc:	0
Z:	0	C:	0	R:	0
				Conc:	0
UOM:	%	Mean Test Assay:			%

Analyzed By

Miriam Bahena

Certified By

Nelson Ma



DocNumber: 581915

UNIT B 3/21/25



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Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/10/2024

Linde Order Number: 72948560

Part Number: NI CO9ME-AS

Customer PO Number: 80963678

Fill Date: 10/03/2024

Lot Number: 70086427709

Cylinder Style & Outlet: AS

CGA 350

Cylinder Pressure and Volume: 2000 psig 147 ft3

Certified Concentration

Expiration Date:	10/10/2032	NIST Traceable
Cylinder Number:	CC707360	Expanded Uncertainty
9.21 ppm	Carbon monoxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 10/10/2024

Term: 96 Months

Expiration Date: 10/10/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Carbon monoxide

Requested Concentration: 9 ppm

Certified Concentration: 9.21 ppm

Instrument Used: Horiba VIA-510 S/N 43627990042

Analytical Method: NDIR

Last Multipoint Calibration: 09/27/2024

Reference Standard:

Type / Cylinder #: GMS / DT0014643

Concentration / Uncertainty: 10.04 ppm ±0.05 ppm

Expiration Date: 08/16/2030

Traceable to: SRM # / Sample # / Cylinder #: 1677C / 5-J-42 / CAL015337

SRM Concentration / Uncertainty: 9.825 / ±0.047

SRM Expiration Date: 06/24/2024

First Analysis Data:				Date	10/10/2024
Z:	4.8	R:	204.3	C:	188.1
Conc:	9.21				
R:	204.5	Z:	4.8	C:	188
Conc:	9.21				
Z:	4.8	C:	188.2	R:	204.9
Conc:	9.22				
UOM:	mV	Mean Test Assay: 9.21 ppm			

Second Analysis Data:				Date	
Z:	0	R:	0	C:	0
Conc:	0				
R:	0	Z:	0	C:	0
Conc:	0				
Z:	0	C:	0	R:	0
Conc:	0				
UOM:	mV	Mean Test Assay: ppm			

Analyzed By

Miriam Bahena

Certified By

Nelson Ma

UNIT B CEMS MAINTENANCE LOG

MSCC Work Number: 164639

DATE: March 25, 2025

Name: Bryan Taylor/Greg T Davis

REASON FOR CEMS SERVICE: Annual maintenance. Changed catalyst tubes, filters, descant, and pumps.

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 25, 2025

CEMS Time 08:03 PST

Clock Time 09:03 PDT

Switched out of maintenance March 25, 2025

CEMS Time 11:46 PST

Clock Time 12:46 PDT

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

07:55PST Obtain work authorization from control room, tailboard job and JSA

08:03PST Put CEMS into maintenance

08:05PST Annual maintenance. Changed catalyst tubes, filters, descant, and pumps.

11:46PST Took CEMS out of maintenance

11:47PST Auto calibration started

12:11PST Calibration completed and passed

12:30PST Notified control room that job was complete

UNIT C
CEM MAINTENANCE LOG

UNIT C CEMS MAINTENANCE LOG

MSCC Work Number: 163160

DATE: January 2, 2025

Name: Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, CO Low

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 2, 2025

CEMS Time 06:09 PST

Clock Time 06:09 PST

Switched out of maintenance January 2, 2025

CEMS Time 06:16 PST

Clock Time 06:16 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:00PST Obtain work authorization from control room, tailboard job and JSA

06:09PST Put CEMS into maintenance

06:12PST Changed depleted cylinder, CO Low

06:16PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



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PGVP ID: F22023

DocNumber: 561366

Unit C 1/2/25

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 11/28/2023

Linde Order Number: 72633508

Part Number: N1CO9ME-AS

Customer PO Number: 80644588

Fill Date: 11/09/2023

Lot Number: 70086331303

Cylinder Style & Outlet: AS

CGA 350

Cylinder Pressure and Volume: 2000 psig 145 ft³

Certified Concentration

Expiration Date:	11/27/2031	NIST Traceable
Cylinder Number:	CC325471	Expanded Uncertainty
8.87 ppm	Carbon monoxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 11/27/2023

Term: 96 Months

Expiration Date: 11/27/2031

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Carbon monoxide

Requested Concentration: 9 ppm

Certified Concentration: 8.87 ppm

Instrument Used: Horiba VIA-510 S/N 43627990042

Analytical Method: NDIR

Last Multipoint Calibration: 10/25/2023

First Analysis Data:				Date	11/27/2023
Z: 7.2	R: 106	C: 94.3	Conc: 8.85		
R: 106	Z: 7	C: 94.6	Conc: 8.88		
Z: 7.2	C: 94.8	R: 106.2	Conc: 8.9		
UOM: mV			Mean Test Assay: 8.87 ppm		

Reference Standard: Type / Cylinder#: GMIS / DT0014643

Concentration / Uncertainty: 10.04 ppm ± 0.05 ppm

Expiration Date: 08/16/2030

Traceable to: SRM # / Sample # / Cylinder #: 1677C / 5-J-42 / CAL015337

SRM Concentration / Uncertainty: 9.825 / ± 0.047

SRM Expiration Date: 06/24/2024

Second Analysis Data:				Date	
Z: 0	R: 0	C: 0	Conc: 0		
R: 0	Z: 0	C: 0	Conc: 0		
Z: 0	C: 0	R: 0	Conc: 0		
UOM: mV			Mean Test Assay: ppm		

Analyzed By

Courtney Zielke

Certified By

Amalia Real

UNIT C CEMS MAINTENANCE LOG

MSCC Work Number: 162810

DATE: January 24, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Perform Calibration Gas Audit

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 24, 2025

CEMS Time 08:01 PST

Clock Time 08:01 PST

Switched out of maintenance January 24, 2025

CEMS Time 09:30 PST

Clock Time 09:30 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

07:50PST Obtain work authorization from control room, tailboard job and JSA

08:01PST Put CEMS into maintenance

08:05PST Performed Calibration Gas Audit

09:30PST Took CEMS out of maintenance

09:31PST Auto calibration started

09:56PST Calibration completed and passed

10:00PST Notified control room that job was complete

UNIT C CEMS MAINTENANCE LOG

MSCC Work Number: 164197

DATE: January 30, 2025

Name: Bryan Taylor/ Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, CO2 and Nitrogen

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance January 30, 2025

CEMS Time 06:10 PST

Clock Time 06:10 PST

Switched out of maintenance January 30, 2025

CEMS Time 06:22 PST

Clock Time 06:22 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:00PST Obtain work authorization from control room, tailboard job and JSA

06:10PST Put CEMS into maintenance

06:12PST Changed depleted cylinder, CO2 and Nitrogen

06:22PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



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UNIT C 1/30/25

Customer & Order Information:

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD,
BAKERSFIELD, CA 93308-4919

Linde Order Number: **72990607**

Customer PO Number: **81006194**

Certificate Issuance Date: **11/11/2024**

Revision Number: **0**

Certification Date: **11/8/2024**

Lot Number: **N70086429101**

Part Number: **NI 5.5CE-AS**

DocNumber: **795428**

CERTIFICATE OF ANALYSIS

Nitrogen, 5.5 Continuous Emission Monitoring Zero

Analytes	Specification	Analytical Results	Analytical Reference	Analytical Uncertainty
Nitrogen	$\geq 99.9995\%$	$\geq 99.9995\%$	5	N/A
Carbon Dioxide	$\leq 1\text{ ppm}$	$\leq 0.5\text{ ppm}$	3	$\pm 10\%$
Carbon Monoxide	$\leq 1.5\text{ ppm}$	$\leq 0.5\text{ ppm}$	3	$\pm 15\%$
Total Hydrocarbons	$\leq 0.1\text{ ppm}$	$\leq 0.1\text{ ppm}$	6	$\pm 15\%$
Oxides of Nitrogen	$\leq 0.1\text{ ppm}$	$\leq 0.1\text{ ppm}$	7	$\pm 15\%$
Oxygen	$\leq 0.5\text{ ppm}$	$\leq 0.5\text{ ppm}$	2	$\pm 15\%$
Sulfur Dioxide	$\leq 1.1\text{ ppm}$	$\leq 0.1\text{ ppm}$	1	$\pm 15\%$
Water	$\leq 1\text{ ppm}$	$\leq 1.5\text{ ppm}$	4	$\pm 10\%$

Cylinder Style: **AS**

Fill Date: **10/17/2024**

Filling Method: **Pressure/Temperature**

Cylinder Pressure @ 70 F: **2000 psig**

Analysis Date: **10/22/2024**

Cylinder Volume: **142 ft³**

Valve Outlet Connection: **CGA 580**

Cylinder Number(s): **DT0058200, DT0058331, DT0058145, DT0058415, DT0058172, DT0058342, DT0058126, DT0058168, DT0058340, DT0058196, DT0058125, DT0058141**

Analyzed Cylinder Number(s): **DT0058200**

Analyst: **Amalia Real**

Approved Signer: **Ying Yu**

Key to Analytical Techniques:

Reference	Analytical Instrument - Analytical Principle
1	Ametek 921CE S/N AW-921-S321 - UV Spectrometry
2	Delta F DF-550 Nanotrace - Electrolytic Cell/Electrochemical
3	Horiba Instruments Inc. GA-360E - NDIR
4	Meeco Aquavolt PLUS - Specific Water Analyzer
5	N/A - By Difference of Typical Impurities
6	Rosemount/Beckman 400A - FID Total Hydrocarbon Analyzer
7	Thermo Electron 42i-LS S/N 1030645077 - Chemiluminescence

This analysis of the product described herein was prepared by Linde Gas & Equipment Inc. using instruments whose calibration is certified using Linde Gas & Equipment Inc. Reference Materials which are traceable to the International System of Units (SI) through either weights traceable to the National Institute of Standards and Technology (NIST) or Measurement Canada, or through NIST Standard Reference Materials or equivalent where available.

Note: All expressions for concentration (e.g., % or ppm) are for gas phase, by mole unless otherwise noted. Analytical uncertainty is expressed as a Relative % unless otherwise noted.

IMPORTANT

The information contained herein has been prepared at your request by personnel within Linde Gas & Equipment Inc. While we believe the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any particular purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall liability of Linde Gas & Equipment Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.



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PGVP ID: F22024

DocNumber: 575782

UNIT C 1/30/25

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 07/01/2024

Linde Order Number: 72850603

Part Number: NI CD18E-AS

Customer PO Number: 80864531

Fill Date: 06/17/2024

Lot Number: 70086416902

Cylinder Style & Outlet: AS

CGA 580

Cylinder Pressure and Volume: 2000 psig

152 ft3

Certified Concentration

Expiration Date:	06/27/2032	NIST Traceable
Cylinder Number:	CC700500	Expanded Uncertainty
18.00 %	Carbon dioxide	± 0.15 %
Balance	Nitrogen	

ProSpec EZ Cert



Certification Information:

Certification Date: 06/27/2024

Term: 96 Months

Expiration Date: 06/27/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Csl Update)

1. Component:

Carbon dioxide

Requested Concentration: 18 %
Certified Concentration: 18.00 %
Instrument Used: Horiba VIA-510 S/N 20C194WK
Analytical Method: NDIR
Last Multipoint Calibration: 06/25/2024

Reference Standard:

Type / Cylinder #: NTRM / CC725981

Concentration / Uncertainty: 19.34 % ±0.16 %

Expiration Date: 01/12/2027

Traceable to: SRM # / Sample # / Cylinder #: NTRM / 190701 / CC725973

SRM Concentration / Uncertainty: 19.34% / ±0.16%

SRM Expiration Date: 01/12/2027

First Analysis Data:		Date	
Z: 0	R: 19.34	C: 18	Conc: 18
R: 19.34	Z: 0	C: 17.99	Conc: 17.99
Z: 0	C: 18	R: 19.34	Conc: 18
UOM: %		Mean Test Assay: 18 %	

Second Analysis Data:		Date	
Z: 0	R: 0	C: 0	Conc: 0
R: 0	Z: 0	C: 0	Conc: 0
Z: 0	C: 0	R: 0	Conc: 0
UOM: %		Mean Test Assay: %	

Analyzed By

Miriam Bahona

Certified By

Nelson Ma

UNIT C CEMS MAINTENANCE LOG

MSCC Work Number: 164204

DATE: February 4, 2025

Name: Bryan Taylor/ Greg T Davis

REASON FOR CEMS SERVICE: Bottle change, NOx High

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance February 4, 2025

CEMS Time 06:03 PST

Clock Time 06:03 PST

Switched out of maintenance February 4, 2025

CEMS Time 06:09 PST

Clock Time 06:09 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:00PST Obtain work authorization from control room, tailboard job and JSA

06:03PST Put CEMS into maintenance

06:04PST Changed depleted cylinder, NOx High

06:09PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



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UNIT C 2/4/25



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PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 10/22/2024

Linde Order Number: 72961418

Part Number: NI NO135E-AS

Customer PO Number: 80976671

Fill Date: 10/07/2024

Lot Number: 70086428105

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 ft³

Certified Concentration

Expiration Date:	10/22/2032	NIST Traceable
Cylinder Number:	CC81509	Expanded Uncertainty
133.2 ppm	Nitric oxide	± 1.1 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only: NOx 133.7 ppm

Certification Information:

Certification Date: 10/22/2024

Term: 96 Months

Expiration Date: 10/22/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Nitric oxide

Requested Concentration: 135 ppm
Certified Concentration: 133.2 ppm
Instrument Used: Thermo Electron 42i-HL S/N 1030545087
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 10/04/2024

Reference Standard:

Type / Cylinder #: GMIS / ND8831

Concentration / Uncertainty: 99.0 ppm ± 0.8 ppm

Expiration Date: 08/20/2032

Traceable to: SRM # / Sample # / Cylinder #: 1684b / 44-U-07 / FF55557

SRM Concentration / Uncertainty: 98.95 ppm / ± 0.79 ppm

SRM Expiration Date: 09/14/2025

First Analysis Data:				Date	10/15/2024
Z:	0	R:	99	C:	133.2
R:	99	Z:	0	C:	133.1
Z:	0	C:	133.1	R:	99
UOM:	ppm	Mean Test Assay:		133.1	ppm

Second Analysis Data:				Date	10/22/2024
Z:	0	R:	99	C:	133.3
R:	99	Z:	0	C:	133.3
Z:	0	C:	133.3	R:	99
UOM:	ppm	Mean Test Assay:		133.3	ppm

Analyzed By

Lisette Morales

Certified By

Such...

UNIT C CEMS MAINTENANCE LOG

MSCC Work Number: 164219

DATE: February 10, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, NOx Low

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance February 10, 2025

CEMS Time 06:16 PST

Clock Time 06:16 PST

Switched out of maintenance February 10, 2025

CEMS Time 06:24 PST

Clock Time 06:24 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

06:00PST Obtain work authorization from control room, tailboard job and JSA

06:16PST Put CEMS into maintenance

06:17PST Changed depleted cylinder; NOx Low

06:24PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



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UNIT C 2/10/25



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PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 08/28/2024

Linde Order Number: 72901490

Part Number: NI NO9ME-AS

Customer PO Number: 80916039

Fill Date: 08/08/2024

Lot Number: 70086422105

Cylinder Style & Outlet: AS

Cylinder Pressure and Volume: 2000 psig 140 ft³

Certified Concentration

Expiration Date:	08/28/2027	NIST Traceable
Cylinder Number:	CC2896	Expanded Uncertainty
9.13 ppm	Nitric oxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only: NOx 9.15 ppm

Certification Information: Certification Date: 08/28/2024 Term: 36 Months Expiration Date: 08/28/2027

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. **Component:** Nitric oxide
Requested Concentration: 9 ppm
Certified Concentration: 9.13 ppm
Instrument Used: Thermo Electron 42i-LS S/N 1030645077
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 08/05/2024

Reference Standard: Type / Cylinder #: GMIS / ND7468
Concentration / Uncertainty: 10.42 ppm ±0.05 ppm
Expiration Date: 04/15/2027
Traceable to: SRM # / Sample # / Cylinder #: PRM / C2268801 / APEX1429266
SRM Concentration / Uncertainty: 10.01 ppm / ±0.05 ppm
SRM Expiration Date: 09/30/2024

First Analysis Data:				Date	08/21/2024
Z:	0	R:	10.42	C:	9.14
R:	10.43	Z:	0	C:	9.13
Z:	0	C:	9.13	R:	10.41
UOM:	ppm	Mean Test Assay:	9.13	ppm	

Second Analysis Data:				Date	08/28/2024
Z:	0	R:	10.42	C:	9.11
R:	10.41	Z:	0	C:	9.16
Z:	0	C:	9.12	R:	10.41
UOM:	ppm	Mean Test Assay:	9.14	ppm	

Analyzed By

Henry Koung

Certified By

Courtney Ziegle

UNIT C CEMS MAINTENANCE LOG

MSCC Work Number: 164238

DATE: February 21, 2025

Name: Bryan Taylor

REASON FOR CEMS SERVICE: Bottle change, O2

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance February 21, 2025

CEMS Time 06:12 PST

Clock Time 06:12 PST

Switched out of maintenance February 21, 2025

CEMS Time 06:21 PST

Clock Time 06:21 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

05:50PST Obtain work authorization from control room, tailboard job and JSA

06:12PST Put CEMS into maintenance

06:13PST Changed depleted cylinder; O2

06:21PST Took CEMS out of maintenance

07:17PST Auto calibration started

07:41PST Calibration completed and passed

08:00PST Notified control room that job was complete



DocNumber: 584557

UNIT C 2/21/25



Linde Gas & Equipment Inc.
5700 S. Alameda Street
Los Angeles CA 90058
Tel: 323-585-2154
Fax: 714-542-6689
PGVP ID: F22024

CERTIFICATE OF ANALYSIS / EPA PROTOCOL CAS**Customer & Order Information**

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 11/25/2024

Linde Order Number: 73006360

Part Number: NI OX22.5E-AS

Customer PO Number: 81022094

Fill Date: 11/21/24

Lot Number: 7008643 3602

Cylinder Style & Outlet: AS

Cylinder Pressure and Volume: 2000 psig

CGA 590

144 ft3

Certified Concentration

Expiration Date:	11/25/2032	NIST Traceable
Cylinder Number:	CC724309	Expanded Uncertainty
22.53 %	Oxygen	± 0.06 %
Balance	Nitrogen	

ProSpec EZ Cert**Certification Information:**

Certification Date: 11/25/2024

Term: 96 Months

Expiration Date: 11/25/2032

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Certificate)

1. Component:

Oxygen

Requested Concentration: 22.5 %

Certified Concentration: 22.53 %

Instrument Used: Siemens Oxymat 6E S/N 7MB20211AA000CA1

Analytical Method: Paramagnetic

Last Multipoint Calibration: 10/31/2024

Reference Standard:

Type / Cylinder #: GMS / DT0040804

Concentration / Uncertainty: 20.86 % ± 0.05 %

Expiration Date: 09/09/2032

Traceable to: SRM # / Sample # / Cylinder #: 2659a / 71-D-23 / CAL015788

SRM Concentration / Uncertainty: 20.720 % / ± 0.043 %

SRM Expiration Date: 02/28/2026

First Analysis Data:				Date	11/25/2024
Z: 0	R: 20.86	C: 22.53	Conc: 22.52		
R: 20.88	Z: 0	C: 22.56	Conc: 22.55		
Z: 0	C: 22.54	R: 20.88	Conc: 22.53		
UOM: %				Mean Test Assay: 22.53 %	

Second Analysis Data:				Date	
Z: 0	R: 0	C: 0	Conc: 0		
R: 0	Z: 0	C: 0	Conc: 0		
Z: 0	C: 0	R: 0	Conc: 0		
UOM: %				Mean Test Assay: %	

Analyzed By

Miriam Bahena

Certified By

Nelson Ma

UNIT C CEMS MAINTENANCE LOG

MSCC Work Number: 164642, 163612, 163475, 164479, 164639

DATE: March 27, 2025

Name: Bryan Taylor/Greg T Davis

REASON FOR CEMS SERVICE: Annual maintenance, change filters, catalyst tubes and pump diaphragms. Changed Nitrogen bottle

Was the maintenance scheduled or unscheduled? Scheduled

Switched into maintenance March 27, 2025

CEMS Time 08:01 PST

Clock Time 09:01 PST

Switched out of maintenance March 27, 2025

CEMS Time 11:45 PST

Clock Time 12:45 PST

Did the CEMS record an exceedance? NO

Was the exceedance actual? N/A

Was any hourly data lost? No data was lost. Unit was offline

Corrective action taken and work done Time in CEMS time Pacific Standard Time

07:50PST Obtain work authorization from control room, tailboard job and JSA

08:01PST Put CEMS into maintenance

08:05PST Annual maintenance, change filters, catalyst tubes and pump diaphragms.

11:45PST Took CEMS out of maintenance

11:46PST Auto calibration started

12:11PST Calibration completed and passed

12:30PST Notified control room that job was complete



Making the world
more productive

Unit C 3/27/25



Linde Gas & Equipment Inc.
5700 S. Alameda Street
Los Angeles, CA 90058
Tel: 323-585-2154
Fax: 714-542-6689

Customer & Order Information:

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD,
BAKERSFIELD, CA 93308-4919
Linde Order Number: **73069097**
Customer PO Number: **81085779**

Certificate Issuance Date: **2/11/2025**
Revision Number: **0**
Certification Date: **2/11/2025**
Lot Number: **N70086503003F**
Part Number: **NI 5.5CE-AS**
DocNumber: **813939**

CERTIFICATE OF ANALYSIS

Nitrogen, 5.5 Continuous Emission Monitoring Zero

Analytes	Specification	Analytical Results	Analytical Reference	Analytical Uncertainty
Nitrogen	$\geq 99.9995 \%$	$\geq 99.9995 \%$	5	N/A
Carbon Dioxide	$\leq 1 \text{ ppm}$	$\leq 0.5 \text{ ppm}$	3	$\pm 10\%$
Carbon Monoxide	$\leq 0.5 \text{ ppm}$	$\leq 0.5 \text{ ppm}$	3	$\pm 15\%$
Total Hydrocarbons	$\leq 0.1 \text{ ppm}$	$\leq 0.1 \text{ ppm}$	6	$\pm 15\%$
Oxides of Nitrogen	$\leq 0.1 \text{ ppm}$	$\leq 0.1 \text{ ppm}$	7	$\pm 15\%$
Oxygen	$\leq 0.5 \text{ ppm}$	$\leq 0.5 \text{ ppm}$	2	$\pm 15\%$
Sulfur Dioxide	$\leq 0.1 \text{ ppm}$	$\leq 0.1 \text{ ppm}$	1	$\pm 15\%$
Water	$\leq 2 \text{ ppm}$	$\leq 1.5 \text{ ppm}$	4	$\pm 10\%$

Cylinder Style: **AS**
Cylinder Pressure @ 70 F: **2000 psig**
Cylinder Volume: **142 ft³**
Valve Outlet Connection: **CGA 580**
Cylinder Number(s): **DT0008371**
Analyzed Cylinder Number(s): **DT0008371**

Fill Date: **1/30/2025**
Analysis Date: **2/10/2025**

Filling Method: **Pressure/Temperature**

Analyst: **Amalia Real**

Approved Signer: **Ying Yu**

Key to Analytical Techniques:

Reference	Analytical Instrument - Analytical Principle
1	Ametek 921CE S/N AW-921-S321 - UV Spectrometry
2	Delta F DF-550 Nanotrace - Electrolytic Cell/Electrochemical
3	Horiba Instruments Inc. GA-360E - NDIR
4	Meeco Aquavolt PLUS - Specific Water Analyzer
5	N/A - By Difference of Typical Impurities
6	Rosemount/Beckman 400A - FID Total Hydrocarbon Analyzer
7	Thermo Electron 42i S/N 0726024326 - Chemiluminescence

This analysis of the product described herein was prepared by Linde Gas & Equipment Inc. using instruments whose calibration is certified using Linde Gas & Equipment Inc. Reference Materials which are traceable to the International System of Units (SI) through either weights traceable to the National Institute of Standards and Technology (NIST) or Measurement Canada, or through NIST Standard Reference Materials or equivalent where available.

Note: All expressions for concentration (e.g., % or ppm) are for gas phase, by mole unless otherwise noted. Analytical uncertainty is expressed as a Relative % unless otherwise noted.

IMPORTANT

The information contained herein has been prepared at your request by personnel within Linde Gas & Equipment Inc. While we believe the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any particular purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall liability of Linde Gas & Equipment Inc. arising out of the use of the information contained herein exceed the fee established for providing such information.

Midway Sunset Cogeneration Company

CEM System
Calibration Gas Audit
First Quarter 2025

Prepared for:

Midway Sunset Cogeneration Company

Conducted by:

RAP Services, Inc.
1400 Easton Drive, Suite 111
Bakersfield, CA 93309

April 2025

CEM System Calibration Gas Audit

At the request of Midway Sunset Cogeneration Company, **RAP Services, Inc.** performed a Calibration Gas Audit (CGA) on the Continuous Emission Monitor (CEM) systems in service at the Midway Sunset Cogeneration facility. The purpose of this test was to satisfy CEM Quality Assurance (QA) requirements for this quarter by verifying CEM system accuracy and linearity.

The CGA tests of the CEM systems serving Units A, B and C exhaust stacks were conducted by **RAP Services, Inc.** using procedures set forth in 40 CFR, Part 60, Appendix F, Calibration Gas Audit Procedures. All the analyzers subject to this CGA were found to be in compliance with the Appendix F requirements.

Pollutant audit gases are approximately 25 percent and 55 percent of the normal analyzer range. Oxygen audit gases are approximately 5 percent and 10 percent oxygen by concentration. Carbon dioxide audit gases are approximately 6.5 percent and 12 percent carbon dioxide by concentration.

40 CFR, PART 60, APPENDIX F CALIBRATION GAS AUDIT PROCEDURE

Low-range and mid-range calibration gases were introduced to the analyzers via the sample handling system through a tee connection located at the sample probe. The first leg of the tee was open to the atmosphere to prevent pressurizing the sample system with calibration gas, masking potential leaks. The gas was allowed to flow through the sample handling system (i.e. filters, moisture removal system and flow restrictions) until a stable reading at each monitor was obtained. This procedure was then repeated for each gas and each analyzer in triplicate.

The audit is based on the average analyzer response to each level of gas, then expressed as a percent of the actual gas value. A limit of ± 15 percent of the audit gas value is allowed, or alternatively ± 5 ppm for pollutants. Although zero drift is not a requirement of Appendix F QA Protocol, one measurement is included for reference.

Midway Sunset Cogeneration
Unit A
CGA Results - 1st Quarter 2025

Date: 1/23/2025
Technician(s): Kevin Sanchez

Instrument & Audit Point	Test Run	Audit Gas	Instrument Response	Difference	% Accuracy	Exp Date
Low Range NOx	Zero	0.00	-0.01	-0.01	N/A	3/28/2026
Audit Point 1	1	2.53	2.49	-0.04	-1.58	
Cylinder # CC336063	2	2.53	2.52	-0.01	-0.40	
Inst Make: Horiba	3	2.53	2.52	-0.01	-0.40	
Model: CMA-EC662L1	Avg	2.53	2.51	-0.02	-0.79	
Low Range NOx	1	5.45	5.30	-0.15	-2.75	3/27/2026
Audit Point 2	2	5.45	5.32	-0.13	-2.39	
Cylinder # DT0018167	3	5.45	5.34	-0.11	-2.02	
Range 0-10 ppm	Avg	5.45	5.32	-0.13	-2.39	
Low Range CO	Zero	0.00	-0.02	-0.02	N/A	3/28/2026
Audit Point 1	1	2.59	2.54	-0.05	-1.93	
Cylinder # CC336063	2	2.59	2.60	0.01	0.39	
Inst Make: Horiba	3	2.59	2.59	0.00	0.00	
Model: CMA-EC662L1	Avg	2.59	2.58	-0.01	-0.51	
Low Range CO	1	5.51	5.65	0.14	2.54	3/27/2026
Audit Point 2	2	5.51	5.64	0.13	2.36	
Cylinder # DT0018167	3	5.51	5.67	0.16	2.90	
Range 0-10 ppm	Avg	5.51	5.65	0.14	2.60	
O2	Zero	0.00	-0.12	-0.12	N/A	4/27/2028
Audit Point 1	1	5.03	5.03	0.00	0.00	
Cylinder # ALM-022903	2	5.03	5.04	0.01	0.20	
Inst Make: Horiba	3	5.03	5.04	0.01	0.20	
Model: CMA-EC662L1	Avg	5.03	5.04	0.01	0.13	
O2	1	10.18	10.21	0.03	0.29	4/15/2030
Audit Point 2	2	10.18	10.20	0.02	0.20	
Cylinder # EB0092992	3	10.18	10.20	0.02	0.20	
Range: 0-25 %	Avg	10.18	10.20	0.02	0.23	

Limit: The greater of $\pm 15\%$ average accuracy, or (applicable to pollutants only) ± 5 ppm average difference.

Midway Sunset Cogeneration
Unit A
CGA Results - 1st Quarter 2025

Date: 1/23/2025
Technician(s): Kevin Sanchez

Instrument & Audit Point	Test Run	Audit Gas	Instrument Response	Difference	% Accuracy	Exp Date
High Range NOx	Zero	0.00	-0.01	-0.01	N/A	
Audit Point 1	1	37.0	35.55	-1.45	-3.92	
Cylinder # CC443985	2	37.0	35.76	-1.24	-3.35	
Inst Make: Horiba	3	37.0	35.84	-1.16	-3.14	
Model: CMA-EC662L1	Avg	37.0	35.72	-1.28	-3.47	
						2/27/2026
High Range NOx	1	81.3	80.03	-1.27	-1.56	
Audit Point 2	2	81.3	80.20	-1.10	-1.35	
Cylinder # DT0037105	3	81.3	80.29	-1.01	-1.24	
Range 0-150 ppm	Avg	81.3	80.17	-1.13	-1.39	
						3/1/2031
High Range CO	Zero	0.00	-0.02	-0.02	N/A	
Audit Point 1	1	25.1	25.30	0.20	0.80	
Cylinder # CC443985	2	25.1	25.06	-0.04	-0.16	
Inst Make: Horiba	3	25.1	25.30	0.20	0.80	
Model: CMA-EC662L1	Avg	25.1	25.22	0.12	0.48	
						2/27/2026
High Range CO	1	55.2	54.79	-0.41	-0.74	
Audit Point 2	2	55.2	54.77	-0.43	-0.78	
Cylinder # DT0037105	3	55.2	55.00	-0.20	-0.36	
Range 0-100 ppm	Avg	55.2	54.85	-0.35	-0.63	
						3/1/2031
CO2	Zero	0.00	0.00	0.00	N/A	
CO2 Audit Point 1	1	6.50	6.68	0.18	2.77	
Cylinder # DT0011118	2	6.50	6.70	0.20	3.08	
Inst Make: Horiba	3	6.50	6.71	0.21	3.23	
Model: CMA-EC662L1	Avg	6.50	6.70	0.20	3.03	
						6/3/2028
CO2	1	12.03	12.05	0.02	0.17	
CO2 Audit Point 2	2	12.03	12.08	0.05	0.42	
Cylinder # CC101959	3	12.03	12.07	0.04	0.33	
Range: 0-20 %	Avg	12.03	12.07	0.04	0.30	
						6/3/2028

Limit: The greater of $\pm 15\%$ average accuracy, or (applicable to pollutants only) ± 5 ppm average difference.

Midway Sunset Cogeneration
Unit B
CGA Results - 1st Quarter 2025

Date: 1/23/2025
Technician(s): Kevin Sanchez

Instrument & Audit Point	Test Run	Audit Gas	Instrument Response	Difference	% Accuracy	Exp Date
Low Range NOx	Zero	0.00	0.02	0.02	N/A	
Audit Point 1	1	2.53	2.59	0.06	2.37	
Cylinder # CC336063	2	2.53	2.58	0.05	1.98	
Inst Make: Horiba	3	2.53	2.59	0.06	2.37	
Model: CMA-EC662L1	Avg	2.53	2.59	0.06	2.24	3/28/2026
Low Range NOx	1	5.45	5.50	0.05	0.92	
Audit Point 2	2	5.45	5.54	0.09	1.65	
Cylinder # DT0018167	3	5.45	5.49	0.04	0.73	
Range 0-10 ppm	Avg	5.45	5.51	0.06	1.10	3/27/2026
Low Range CO	Zero	0.00	0.22	0.22	N/A	
Audit Point 1	1	2.59	2.76	0.17	6.56	
Cylinder # CC336063	2	2.59	2.75	0.16	6.18	
Inst Make: Horiba	3	2.59	2.75	0.16	6.18	
Model: CMA-EC662L1	Avg	2.59	2.75	0.16	6.31	3/28/2026
Low Range CO	1	5.51	5.72	0.21	3.81	
Audit Point 2	2	5.51	5.69	0.18	3.27	
Cylinder # DT0018167	3	5.51	5.70	0.19	3.45	
Range 0-10 ppm	Avg	5.51	5.70	0.19	3.51	3/27/2026
O2	Zero	0.00	-0.01	-0.01	N/A	
Audit Point 1	1	5.03	4.94	-0.09	-1.79	
Cylinder # ALM-022903	2	5.03	4.91	-0.12	-2.39	
Inst Make: Horiba	3	5.03	4.87	-0.16	-3.18	
Model: CMA-EC662L1	Avg	5.03	4.91	-0.12	-2.45	4/27/2028
O2	1	10.18	10.14	-0.04	-0.39	
Audit Point 2	2	10.18	10.11	-0.07	-0.69	
Cylinder # EB0092992	3	10.18	10.05	-0.13	-1.28	
Range: 0-25 %	Avg	10.18	10.10	-0.08	-0.79	4/15/2030

Limit: The greater of $\pm 15\%$ average accuracy, or (applicable to pollutants only) ± 5 ppm average difference.

Midway Sunset Cogeneration
Unit B
CGA Results - 1st Quarter 2025

Date: 1/23/2025
Technician(s): Kevin Sanchez

Instrument & Audit Point	Test Run	Audit Gas	Instrument Response	Difference	% Accuracy	Exp Date
High Range NOx	Zero	0.00	0.02	0.02	N/A	
Audit Point 1	1	37.0	35.33	-1.67	-4.51	
Cylinder # CC443985	2	37.0	35.52	-1.48	-4.00	
Inst Make: Horiba	3	37.0	35.57	-1.43	-3.86	
Model: CMA-EC662L1	Avg	37.0	35.47	-1.53	-4.13	
High Range NOx	1	81.3	80.59	-0.71	-0.87	
Audit Point 2	2	81.3	80.73	-0.57	-0.70	
Cylinder # DT0037105	3	81.3	80.58	-0.72	-0.89	
Range 0-150 ppm	Avg	81.3	80.63	-0.67	-0.82	
High Range CO	Zero	0.00	0.22	0.22	N/A	
Audit Point 1	1	25.1	24.77	-0.33	-1.31	
Cylinder # CC443985	2	25.1	24.66	-0.44	-1.75	
Inst Make: Horiba	3	25.1	24.72	-0.38	-1.51	
Model: CMA-EC662L1	Avg	25.1	24.72	-0.38	-1.53	
High Range CO	1	55.2	54.27	-0.93	-1.68	
Audit Point 2	2	55.2	54.33	-0.87	-1.58	
Cylinder # DT0037105	3	55.2	54.27	-0.93	-1.68	
Range 0-100 ppm	Avg	55.2	54.29	-0.91	-1.65	
CO2	Zero	0.00	-0.27	-0.27	N/A	
CO2 Audit Point 1	1	6.50	6.58	0.08	1.23	
Cylinder # DT0011118	2	6.50	6.61	0.11	1.69	
Inst Make: Horiba	3	6.50	6.61	0.11	1.69	
Model: CMA-EC662L1	Avg	6.50	6.60	0.10	1.54	
CO2	1	12.03	12.05	0.02	0.17	
CO2 Audit Point 2	2	12.03	12.07	0.04	0.33	
Cylinder # CC101959	3	12.03	12.07	0.04	0.33	
Range: 0-20 %	Avg	12.03	12.06	0.03	0.28	

Limit: The greater of $\pm 15\%$ average accuracy, or (applicable to pollutants only) ± 5 ppm average difference.

Midway Sunset Cogeneration
Unit C
CGA Results - 1st Quarter 2025

Date: 1/24/2025
Technician(s): Kevin Sanchez

Instrument & Audit Point	Test Run	Audit Gas	Instrument Response	Difference	% Accuracy	Exp Date
Low Range NOx	Zero	0.00	-0.05	-0.05	N/A	
Audit Point 1	1	2.53	2.61	0.08	3.16	
Cylinder # CC336063	2	2.53	2.56	0.03	1.19	
Inst Make: Horiba	3	2.53	2.60	0.07	2.77	
Model: CMA-EC662L1	Avg	2.53	2.59	0.06	2.37	
Low Range NOx	1	5.45	5.58	0.13	2.39	
Audit Point 2	2	5.45	5.59	0.14	2.57	
Cylinder # DT0018167	3	5.45	5.57	0.12	2.20	
Range 0-10 ppm	Avg	5.45	5.58	0.13	2.39	
Low Range CO	Zero	0.00	0.15	0.15	N/A	
Audit Point 1	1	2.59	2.63	0.04	1.54	
Cylinder # CC336063	2	2.59	2.59	0.00	0.00	
Inst Make: Horiba	3	2.59	2.64	0.05	1.93	
Model: CMA-EC662L1	Avg	2.59	2.62	0.03	1.16	
Low Range CO	1	5.51	5.63	0.12	2.18	
Audit Point 2	2	5.51	5.64	0.13	2.36	
Cylinder # DT0018167	3	5.51	5.67	0.16	2.90	
Range 0-10 ppm	Avg	5.51	5.65	0.14	2.48	
O2	Zero	0.00	-0.01	-0.01	N/A	
Audit Point 1	1	5.03	5.08	0.05	0.99	
Cylinder # ALM-022903	2	5.03	5.03	0.00	0.00	
Inst Make: Horiba	3	5.03	5.05	0.02	0.40	
Model: CMA-EC662L1	Avg	5.03	5.05	0.02	0.46	
O2	1	10.18	10.19	0.01	0.10	
Audit Point 2	2	10.18	10.21	0.03	0.29	
Cylinder # EB0092992	3	10.18	10.19	0.01	0.10	
Range: 0-25 %	Avg	10.18	10.20	0.02	0.16	

Limit: The greater of $\pm 15\%$ average accuracy, or (applicable to pollutants only) ± 5 ppm average difference.

Midway Sunset Cogeneration
Unit C
CGA Results - 1st Quarter 2025

Date: 1/24/2025
Technician(s): Kevin Sanchez

Instrument & Audit Point	Test Run	Audit Gas	Instrument Response	Difference	% Accuracy	Exp Date
High Range NOx	Zero	0.00	-0.05	-0.05	N/A	
Audit Point 1	1	37.0	35.47	-1.53	-4.14	
Cylinder # CC443985	2	37.0	35.56	-1.44	-3.89	
Inst Make: Horiba	3	37.0	35.80	-1.20	-3.24	
Model: CMA-EC662L1	Avg	37.0	35.61	-1.39	-3.76	
High Range NOx	1	81.3	80.52	-0.78	-0.96	
Audit Point 2	2	81.3	80.56	-0.74	-0.91	
Cylinder # DT0037105	3	81.3	80.60	-0.70	-0.86	
Range 0-150 ppm	Avg	81.3	80.56	-0.74	-0.91	
High Range CO	Zero	0.00	0.15	0.15	N/A	
Audit Point 1	1	25.1	24.84	-0.26	-1.04	
Cylinder # CC443985	2	25.1	24.80	-0.30	-1.20	
Inst Make: Horiba	3	25.1	24.88	-0.22	-0.88	
Model: CMA-EC662L1	Avg	25.1	24.84	-0.26	-1.04	
High Range CO	1	55.2	54.86	-0.34	-0.62	
Audit Point 2	2	55.2	54.59	-0.61	-1.11	
Cylinder # DT0037105	3	55.2	54.76	-0.44	-0.80	
Range 0-100 ppm	Avg	55.2	54.74	-0.46	-0.84	
CO2	Zero	0.00	0.01	0.01	N/A	
CO2 Audit Point 1	1	6.50	6.44	-0.06	-0.92	
Cylinder # DT0011118	2	6.50	6.43	-0.07	-1.08	
Inst Make: Horiba	3	6.50	6.44	-0.06	-0.92	
Model: CMA-EC662L1	Avg	6.50	6.44	-0.06	-0.97	
CO2	1	12.03	12.00	-0.03	-0.25	
CO2 Audit Point 2	2	12.03	11.99	-0.04	-0.33	
Cylinder # CC101959	3	12.03	11.99	-0.04	-0.33	
Range: 0-20 %	Avg	12.03	11.99	-0.04	-0.30	

Limit: The greater of $\pm 15\%$ average accuracy, or (applicable to pollutants only) ± 5 ppm average difference.

Midway Sunset Cogeneration
Original Horiba CEMS
CGA Results - 1st Quarter 2025

Date: 1/24/2025
Technician(s): Kevin Sanchez

Instrument & Audit Point	Test Run	Audit Gas	Instrument Response	Difference	% Accuracy	Exp Date
Low Range NOx	Zero	0.00	0.05	0.05	N/A	
Audit Point 1	1	5.45	5.22	-0.23	-4.22	
Cylinder # DT0018167	2	5.45	5.16	-0.29	-5.32	
Inst Make: Horiba	3	5.45	5.16	-0.29	-5.32	
Model: ENDA	Avg	5.45	5.18	-0.27	-4.95	
Low Range NOx	1	13.58	12.42	-1.16	-8.54	
Audit Point 2	2	13.58	12.35	-1.23	-9.06	
Cylinder # CC423137	3	13.58	12.45	-1.13	-8.32	
Range 0-25 ppm	Avg	13.58	12.41	-1.17	-8.64	
Low Range CO	Zero	0.00	0.26	0.26	N/A	
Audit Point 1	1	25.1	24.10	-1.00	-3.98	
Cylinder # CC443985	2	25.1	24.20	-0.90	-3.59	
Inst Make: Horiba	3	25.1	24.11	-0.99	-3.94	
Model: ENDA	Avg	25.1	24.14	-0.96	-3.84	
Low Range CO	1	55.2	51.58	-3.62	-6.56	
Audit Point 2	2	55.2	51.80	-3.40	-6.16	
Cylinder # DT0037105	3	55.2	51.76	-3.44	-6.23	
Range 0-100 ppm	Avg	55.2	51.71	-3.49	-6.32	
O2	Zero	0.00	0.66	0.66	N/A	
Audit Point 1	1	5.03	5.58	0.55	10.93	
Cylinder # ALM-022903	2	5.03	5.62	0.59	11.73	
Inst Make: Horiba	3	5.03	5.64	0.61	12.13	
Model: ENDA	Avg	5.03	5.61	0.58	11.60	
O2	1	10.18	10.51	0.33	3.24	
Audit Point 2	2	10.18	10.52	0.34	3.34	
Cylinder # EB0092992	3	10.18	10.56	0.38	3.73	
Range: 0-25 %	Avg	10.18	10.53	0.35	3.44	

Limit: The greater of $\pm 15\%$ average accuracy, or (applicable to pollutants only) ± 5 ppm average difference.

The SLC Conditions have been removed, and Aera has surrendered the permit associated with the steam generator that is no longer applied.

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