

DOCKETED

Docket Number:	05-AFC-02C
Project Title:	The Walnut Creek Energy Park
TN #:	221379
Document Title:	Petition to Amend #10 for Air Quality and Worker Safety Conditions
Description:	N/A
Filer:	Patty Paul
Organization:	Walnut Creek Energy Park
Submitter Role:	Applicant
Submission Date:	10/4/2017 3:22:31 PM
Docketed Date:	10/4/2017

September 28, 2017

Dale Rundquist
Compliance Project Manager
Siting, Transmission and Environmental Protection
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Subject: **Walnut Creek Energy Park (Docket No. 05-AFC-2C)**
Petition for Minor Modification #10 – AQ-4, AQ-7 and WS-5

Dear Mr. Rundquist,

Walnut Creek Energy, LLC (WCE) petitions the California Energy Commission (CEC) to modify the Final Decision for the Walnut Creek Energy Park (WCEP) (05-AFC-02C) issued on February 27, 2008. WCE has prepared this Petition to Amend (Petition) in order to obtain the CEC's authorization for minor revisions to Air Quality Conditions of Certification (COC) AQ-4 and AQ-7 and Worker Safety COC WS-5. The Air Quality COC revisions are requested in order to ensure consistency with proposed changes to the Title V Permit submitted to South Coast Air Quality Management District (SCAQMD) originally on January 21, 2016 and June 28, 2016, and again on September 28, 2017. WCE is requesting a correction to the ammonia emission limit (i.e., change 5.0 to 5 ppm) in COC AQ-4 and believes that the proposed change is consistent with other like permit conditions for gas turbines permitted in the Los Angeles Basin. Additionally, WCE is requesting clarifying language be added to COC AQ-7 regarding the PM10 and PM2.5 source tests that the operating load of 100 percent for PM10 emission tests also applies to PM2.5 emission tests. Furthermore, WCE is requesting a minor modification to COC WS-5 which currently requires training of a security guard to use an AED device. WCEP does not have on-site security guards nor are they required per the CEC approved Operations Security Plan. Thus, WCE is requesting a modification to the language of COC WS-5 which will ensure consistency with the requirements of the Operations Security Plan. This Petition has been prepared in accordance with California Code of Regulations, Title 20, Public Utilities and Energy, Section 1769.

With adherence to the Conditions of Certification, the WCEP, as modified, will not cause significant adverse impacts to the environment and will not cause environmental impacts substantially different than those addressed in the Commission Decision.

Should you have any questions or require additional information related to this submittal, please contact me at (626) 986-0370.

Sincerely,



Rick McPherson
Plant Manager

Attachments

WCEP O&M File: 3.3.2.2

cc: George Piantka, NRG Energy, Inc.
Heather MacLeod, NRG Energy, Inc.

**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

In the Matter of:

WALNUT CREEK ENERGY PARK

WALNUT CREEK ENERGY, LLC

Docket No. 05-AFC-02C

PETITION TO AMEND FINAL DECISION

**WALNUT CREEK ENERGY, LLC'S
PETITION TO AMEND THE FINAL DECISION
FOR THE WALNUT CREEK ENERGY PARK**

September 28, 2017

Prepared by
Trinity Consultants/Sierra Research
1801 J Street
Sacramento, CA 95811
Phone: (916) 444-6666

Consultant for **WALNUT CREEK ENERGY, LLC**

**STATE OF CALIFORNIA ENERGY
RESOURCES CONSERVATION
AND DEVELOPMENT
COMMISSION**

In the Matter of:

**WALNUT CREEK ENERGY PARK
WALNUT CREEK ENERGY, LLC**

Docket No. 05-AFC-02C

PETITION TO AMEND FINAL DECISION

**WALNUT CREEK ENERGY, LLC'S PETITION TO AMEND
THE FINAL DECISION FOR THE
WALNUT CREEK ENERGY PARK
(Amendment #10)**

I. INTRODUCTION

Petitioner, and Project Owner, Walnut Creek Energy, LLC (Petitioner), submits this Petition to Amend the Final Decision for the Walnut Creek Energy Park (WCEP or Project). The California Energy Commission (CEC or Commission) issued its Final Decision on February 27, 2008. WCEP, a nominal 500 megawatt (MW) simple-cycle power plant, began commercial operations in May 2013 and is located in the City of Industry, within Los Angeles County, California.

The purpose of this Petition is to request that Commission Staff approve corrections to references to the ammonia emission (i.e., "slip") limit in Air Quality Condition of Certification (COC) AQ-4 (hereinafter referred to as Condition AQ-4). The modification to COC AQ-4 will ensure consistency with proposed changes to the Title V Permit submitted to South Coast Air Quality Management District (SCAQMD) originally on June 28, 2016 and again on September 28, 2017.

Furthermore, Petitioner requests that Commission Staff approve changes to COC AQ-7 pertaining to PM₁₀ and PM_{2.5} source testing requirements. The proposed modification to COC AQ-7 would ensure consistency with proposed changes to the Title V Permit submitted to the South Coast Air Quality Management District (SCAQMD) originally on January 21, 2016 and again on September 28, 2017.

In addition, Petitioner proposes a minor change to COC WorkerSafety-5. The proposed change would modify the list of on-site operations personnel who are required to be trained to use the facility's portable automatic external defibrillator (AED) device. The current language in COC WorkerSafety-5 requires that "one security guard" be trained to use the AED device. However, the CEC approved Operations Security Plan, as required per COC HAZ-9, allows for security measures that do not include full-time on-site security guards.¹ As such, Petitioner does not employ security guards for WCEP. To ensure consistency with the Project's Operations Security Plan and HAZ-9, and to clarify WorkerSafety-5, Petitioner proposes to strike certain language from WorkerSafety-5, as described in more detail below.

II. Summary of Proposed Changes

A. Proposed Modifications to Conditions AQ-4 and AQ-7²

On January 21, 2016, Petitioner submitted a Permit application to the SCAQMD requesting several changes to the Title V Permit for the WCEP as part of the Title V renewal (See Attachment 1: January 21, 2016 Application to Amend Title V Permit). On June 28, 2016 an additional change to the Title V Permit for the WCEP was requested of the SCAQMD (See Attachment 2: June 28, 2016 Request to SCAQMD). On July 6, 2017 the SCAQMD processed the Title V Permit renewal; however, the requested changes were deferred. The SCAQMD

¹ To ensure the safety and security of WCEP, the specifics of the Operations Security Plan are not set forth in detail herein.

² Proposed changes to Conditions of Certification are shown in **bold, underlined** text (for additions) or ~~strikethrough~~ text (for deletions).

intends to reopen the Title V Permit to remove construction and commissioning related permit conditions presently in Section H (Permit to Construct/Temporary Permit to Operate) and move operations associated permit conditions from Section H to Section D (Permit to Operate). SCAQMD has therefore asked that we resubmit the change requests (See Attachment 3: September 28, 2017 Request to SCAQMD). The following is a brief summary of these requested changes filed with SCAQMD, most of which do not require changes to the CEC license for WCEP:

- Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Section H, Permit Condition D12.6 for Device Number D34) (***no change to Conditions of Certification in WCEP license***);
- Clarification that the inlet temperature requirements for the Selective Catalytic Reduction (SCR) do not apply during startup and shutdown periods (Section H, Permit Condition D12.3 for Device Numbers C4, C10, C16, C22 and C28) (***no change to Conditions of Certification in WCEP license***);
- Addition of applicable conditions from 40 CFR 60, Subpart IIII for the emergency fire pump engine (***no change to Conditions of Certification in WCEP license***);
- Correction to the ammonia emission (i.e., “slip”) limit from 5.0 parts per million (ppm) to 5 ppm, which is consistent with like permit conditions for gas turbines permitted in the Los Angeles Basin and in California, in general (Section H, Permit Condition A195.4 for Device Numbers C4, C10, C16, C22 and C28) (***proposed change to COC AQ-4 addressed in this Petition***); and
- Clarification that the operating load of 100 percent for PM₁₀ emission tests also applies to PM_{2.5} emission tests (Section H, Permit Condition D29.3 for Device Numbers D1, D7, D13, D19 and D25) (***proposed change to COC AQ-7 addressed in this Petition***).

The Petitioner requests a correction to the ammonia emission limit (i.e., change 5.0 to 5 ppm) in COC AQ-4 to make the Condition consistent with the Title V Permit change request submitted to the SCAQMD, and the Petitioner requests clarifying language be added to COC AQ-7 regarding the PM₁₀ and PM_{2.5} source tests. Specific changes to the respective COCs are presented in Section III below. The proposed changes to COCs AQ-4 and AQ-7 will not affect operating conditions or emission limits for the respective gas turbines, nor affect any other emission and/or operating limits or testing conditions for the gas turbines. To that end, the Petitioner respectfully requests approval of the requested changes to COCs AQ-4 and AQ-7, as set forth in Section III below.

B. Proposed Modification to WorkerSafety-5

Petitioner requests a minor modification to COC Worker Safety-5, which currently requires training of a security guard to use an AED device. Specifically, WorkerSafety-5 focuses on assurance that an AED is on site at all times and that operations personnel are properly trained to use the AED. The Condition identifies those operations personnel to be trained as being “minimum 2 personnel per shift, including one security guard.” Security measures for WCEP, as set forth in the CEC approved Operations Security Plan, do not require on-site security guards. As such, Petitioner does not employ security guards for WCEP.³

The requested modification to COC WorkerSafety-5 will ensure consistency between the requirements of the approved Operations Security Plan and WorkerSafety-5. This proposed minor change to WorkerSafety-5 will not affect the safety and security of WCEP, its employees, or the public. To that end, Petitioner respectfully requests approval of the minor modification to Condition WorkerSafety-5, as set forth in further detail below.

III. INFORMATION REQUIRED PURSUANT TO CALIFORNIA CODE OF REGULATIONS SECTION 1769

³ The Operations Security Plan, dated August 16, 2012, was approved by the CEC on December 20, 2012.

A. Complete description of the proposed modifications, including new language for any conditions that will be affected. (Section 1769(a)(1)(A).)

1. Proposed Modifications to Condition of Certification AQ-4.

The proposed modification to COC AQ-4 would change the ammonia emission (i.e., “slip”) limit from 5.0 ppm to 5 ppm. Specific changes to the Condition are shown below in **bold underlined** text:

AQ-4: The 2.5 ppm NO_x emissions limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

The 4.0 ppm CO emission limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

The 2.0 ppm VOC emission limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

The ~~5.0~~ **5** ppm NH₃ emission limit(s) are averaged over 60 minutes at 15 percent oxygen, dry basis.

Verification: The project owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report of Condition of Certification AQ-SC10.

2. Proposed Modifications to Condition of Certification AQ-7.

The proposed modifications will clarify PM₁₀ and PM_{2.5} emission source test requirements in COC AQ-7. Specifically, the proposed language addresses testing conditions and methods for the PM₁₀ and PM_{2.5} emission source test. Proposed modifications to COC AQ-7 are included below in **bold underlined** text.

AQ-7: The project owner shall conduct an initial source test for NO_x, CO, SO_x, VOC, NH₃ and PM₁₀ and a periodic source test every three years thereafter for NO_x, CO, SO_x, VOC, **PM2.5**, and PM₁₀ of each gas turbine exhaust stack in accordance with the following requirements:

- The project owner shall submit a source test protocol to the District and the CPM 45 days prior to the proposed source test date for approval. The protocol shall include the proposed operating conditions of the gas turbine, the identity of the testing lab, a statement from the lab certifying that it meets the criteria

of District Rule 304, and a description of all sampling and analytical procedures.

- The initial source test shall be conducted no later than 180 days following the date of first fire.
- The District and CPM shall be notified at least 10 days prior to the date and time of the source test.
- **With the exception of PM10 and PM2.5 testing, the source test shall be conducted with the gas turbine operating under maximum, average and minimum loads. For PM10 and PM2.5, the test shall be conducted with the gas turbine operating at maximum load.**
- The source test shall be conducted to determine the oxygen levels in the exhaust.
- The source test shall measure the mass flow rate in lb/hr, fuel flow rate, the flue gas flow rate and the turbine generating output in MW.
- The source test shall be conducted for the pollutants listed using the methods, averaging times, and test locations indicated and as approved by the CPM:

Pollutant	Method	Averaging Time	Test Location
NOx	District Method 100.1	1 hour	Outlet of SCR
CO	District Method 100.1	1 hour	Outlet of SCR
SOx	District Method 307-91	District approved averaging time	Fuel Sample
VOC	District Method 25.3	1 hour	Outlet of SCR
PM10 (and as a surrogate for PM2.5)	District Method 5	4 hours	Outlet of SCR
<u>PM2.5</u>	<u>EPA Method 201A and 202</u>	<u>4 hours</u>	<u>Outlet of SCR</u>
Ammonia	District Methods 5.3 and 207.1 or EPA Method 17	1 hour	Outlet of SCR

- The source test results shall be submitted to the District and the CPM no later than 60 days after the source test was conducted.
- All emission data is to be expressed in the following units:

- ppmv corrected to 15% oxygen dry basis,
 - pounds per hour,
 - pounds per million cubic feet of fuel burned and
 - additionally, for PM10 only, grains per dry standard cubic feet of **exhaust gas** fuel burned.
- Exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute and dry actual cubic feet per minute.
 - All moisture concentrations shall be expressed in terms of percent corrected to 15 percent oxygen.

Verification: The project owner shall submit the proposed protocol for the initial source tests 45 days prior to the proposed source test date to both the District and CPM for approval. The project owner shall submit source test results no later than 60 days following the source test date to both the District and CPM. The project owner shall notify the District and CPM no later than 10 days prior to the proposed initial source test date and time.

3. Proposed Modification to Condition of Certification Worker Safety-5

As summarized above, Petitioner requests a minor modification to COC Worker Safety-5, which currently requires that operations personnel, “including one security guard,” be trained to use a portable AED device. The COC identifies on-site personnel during operations as being “minimum 2 personnel per shift, including one security guard.” (See 2008 Final Decision at p. 292.) As noted in the Petitioner’s approved Operations Security Plan (submitted in compliance with COC HAZ-9 and approved by the CEC Compliance Project Manager on December 20, 2012), the Petitioner provides for security measures including, but not limited to, perimeter fencing, a main entrance security gate, power plant personnel on-site 24 hours per day, 7 days per week, in addition to a closed-circuit TV monitoring system, perimeter cameras, and perimeter breach detectors. The Petitioner does not employ full-time, on-site security guards as

noted in the approved Operations Security Plan, and per the Final Decision, on-site security personnel are not required. (See 2008 Final Decision, Condition HAZ-9 at pp. 103-104.)

The requested modification to COC WorkerSafety-5 will ensure consistency between the requirements of the approved Operations Security Plan (HAZ-9) and WorkerSafety-5 and will not affect the safety and security of WCEP, its employees, or the public.

WORKER SAFETY-5 The project owner shall ensure that a portable automatic cardiac defibrillator is located on site during construction and operations and shall implement a program to ensure that the equipment is properly maintained and functioning at all times and that for each shift on-site personnel shall be trained in the American Heart Association's Heartsaver Automatic External Defibrillator (AED) Course, or equivalent, as follows:

Construction: minimum 4 personnel per shift, including one security guard,
Operation: minimum 2 personnel per shift, ~~including one security guard.~~

Verification: At least 30 days prior to the start of site mobilization the project owner shall submit to the CPM proof that a portable automatic cardiac defibrillator exists on site and a copy of the training and maintenance program for review and approval.

B. The Necessity for the Proposed Modification. (Section 1769(a)(1)(B).)

Section 1769(a)(1)(B) requires a discussion of the necessity of the proposed modifications. As further described in Attachment 2, the proposed change to COC AQ-4 is consistent with other like permit conditions for gas turbines permitted in the Los Angeles Basin such as AES Huntington Beach, El Segundo Energy Center and CPV Sentinel. The Petitioner believes that these Permits represent that the Best Available Control Technology (BACT) limit for ammonia slip has been demonstrated to be 5 ppm. Furthermore, the proposed change will ensure consistency with other references to the ammonia emissions limit throughout the CEC Final Decision for the WCEP which state 5 ppm. The proposed changes to COC AQ-7 are necessary to address the specific testing conditions and testing methods for PM₁₀ and PM_{2.5} emissions and to ensure consistency with the requested revisions to the SCAQMD Title V

Permit. The proposed modifications to COCs AQ-4 and AQ-7 will not affect the WCEP emissions or operating limits specified in the Project's COCs.

In addition, as described above, WCEP does not have on-site security guards nor are they required per the approved Operations Security Plan. Therefore, the Petitioner seeks the proposed minor modification to COC WorkerSafety-5, which will ensure consistency with the requirements of HAZ-9 and the approved Operations Security Plan. The proposed changes to WorkerSafety-5 will not affect the safety and security of WCEP or its employees.

C. The Proposed Modifications Are Based Upon Information Previously Unknown to Petitioner. (Section 1769(a)(1)(C).)

Section 1769(a)(1)(C) requires a discussion of whether the proposed changes are based on information previously known by Petitioner. In this case, the proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 were previously unknown to Petitioner. Specifically with regard to the proposed modification to COC AQ-4, the Petition is in response to a request for minor changes to the Title V Permit that was recently submitted to SCAQMD. The proposed corrections will ensure consistency with like conditions for other gas turbines permitted in the Los Angeles Basin, in addition to, the other references made to the ammonia emission limit in the CEC Final Decision and the Title V Permit.

With regard to the proposed modification to COC AQ-7, the Petition is based on an application recently submitted to the SCAQMD requesting minor changes to the Title V Permit, which clarifies language pertaining to PM₁₀ and PM_{2.5} emission source test requirements. The proposed changes are necessary to ensure consistency with the recently submitted Permit application requesting changes to the SCAQMD Title V Permit.

As to the proposed modification to COC WorkerSafety-5, the Condition includes the term "security guard" within the Condition as one of the on-site personnel required to be trained to use an AED device. Pursuant to the approved Operations Security Plan, on-site

security guards during plant operations are not required, as other security measures are in place and WCEP is in compliance with those approved security measures. (See 2008 Final Decision, Condition HAZ-9 at pp. 103-104.) The proposed minor modification to COC WorkerSafety-5 will ensure consistency with the requirements of HAZ-9 and the approved Operations Security Plan and will not affect the safety and security of WCEP or its employees.

D. The Proposed Modifications Do Not Change or Undermine the Assumptions, Rationale, or Other Bases of the Final Decision. (Section 1769(a)(1)(D).)

The proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 do not change or undermine the assumptions, rationale, or other bases of the Final Decision approving WCEP, or the Commission's subsequent amendments of the Final Decision. The proposed modifications are necessary to ensure consistency with the respective Title V permit and operations plans submitted to satisfy the respective COCs..

E. An Analysis of the Impacts the Proposed Modifications May Have on the Environment and Proposed Measures to Mitigate Any Significant Adverse Impacts (Section 1769(a)(1)(E).)

The proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 will not have a significant adverse impact on the environment because none of the proposed modifications change any of the emission or operating limits specified in the WCEP Final Decision, or subsequent amendments; nor will the proposed modifications affect security measures already in place at WCEP.

F. The Impacts of the Modification of the Facility's Ability to Comply with Applicable LORS (Section 1769(a)(1)(F).)

The proposed modifications will not impact WCEP's ability to comply with all applicable laws, ordinances, regulations, or standards ("LORS"). The proposed modifications do not change any of the emission and/or operating limits specified in the Conditions of Certification—they simply provide a correction to the ammonia emissions limit in COC AQ-4

and clarification language to COC AQ-7 pertaining to PM₁₀ and PM_{2.5} emission source test requirements. Moreover, the proposed modifications to COC WorkerSafety-5 simply provide clarification as to personnel required to be trained to use the facility's on-site AED device. The clarification to COC WorkerSafety-5 will not impact WCEP's ability to comply with all LORS.

G. How the Proposed Modifications May Affect the Public (Section 1769(a)(1)(G).)

The proposed modification to COC AQ-4 simply provides a correction to the ammonia emission limit from 5.0 ppm to 5 ppm. The proposed modifications to COC AQ-7 simply provide clarification language pertaining to PM₁₀ and PM_{2.5} emission source test requirements. The proposed modification to COC WorkerSafety-5 clarifies the operations personnel required to be trained to use the facility's on-site AED device. As such, none of the proposed modifications will affect the public as the revisions will not change any of the emissions and/or operating limits specified in the Conditions of Certification, nor will the minor modifications impact the safety and security of WCEP.

H. Potential Effect on Property Owners, the Public, and the Parties to the Application Proceeding (Section 1769(a)(1)(H) and (Section 1769(a)(1)(I).))

Nearby property owners, the Public, and Parties to the Application Proceeding will not be affected by the proposed modifications since these changes will not change the emissions and/or operating limits specified in the Conditions of Certification. The proposed modifications provide a correction to the ammonia emissions limit in COC AQ-4, clarification language to COC AQ-7 pertaining to PM₁₀ and PM_{2.5} emission source test requirements, as well as a minor modification to COC WorkerSafety-5 to clarify the personnel required to receive training to use the on-site AED device. Given there are no potentially affected property owners, a list is not included.

IV. CONCLUSION

For all the reasons above, Petitioner respectfully requests that the Commission approve the proposed modifications to COCs AQ-4, AQ-7 and WorkerSafety-5 for the Walnut Creek Energy Park.

Attachment 1
Application to Amend Title V Permit
(January 21, 2016)

January 19, 2016

Brian L. Yeh
Sr. Air Quality Engineering Manager
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: Walnut Creek Energy Park - Facility ID 146536
RECLAIM/Title V Facility Permit

Dear Mr. Yeh:

Walnut Creek Energy, LLC (WCE) is pleased to submit the enclosed District application forms requesting changes to conditions in the RECLAIM/Title V permit for the Walnut Creek Energy Park (WCEP) issued on May 4, 2012. We are requesting the following changes to the RECLAIM/Title V permit:

- Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Section H, Permit Conditions D12.6 for Device Number D34);
- Clarification that the inlet temperature requirements for the Selective Catalytic Reduction (SCR) do not apply during startup and shutdown periods (Section H, Permit Conditions D12.3 for Device Numbers C4, C10, C16, C22 and C28);
- Clarification that the operating load of 100 percent for PM₁₀ emission tests also applies to PM_{2.5} emission tests (Section H, Permit Conditions D29.1 for Device Numbers D1, D7, D13, D19 and D25); and
- The addition of some applicable conditions from 40 CFR 60, Subpart IIII for the emergency fire pump engine.

The requested changes of conditions are discussed in more detail below.

Removal of the Calibration Requirement for the Fuel Meter for the Emergency Fire Pump Engine

The RECLAIM/Title V Facility Permit (Section H, Permit Condition D12.6) includes a calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Device number D34). To comply with the requirement, the totalizing fuel meter on the emergency fire pump Diesel engine must be removed and taken offsite to a laboratory for calibration. When the fuel meter is removed, the fire pump engine cannot be operated, which poses a certain risk to the facility if an emergency should occur.

Therefore, WCE requests that the calibration be removed from the permit condition. Because the change has no impact on emissions associated with any other permit requirements (i.e., emission limits, operating limits, monitoring/testing requirements, reporting requirements, etc.), WCE believes this change qualifies as a change of condition with no engineering evaluation needed under Rule 301¹ for fee purposes and qualifies as a minor Title V change under Regulation XXX². The requested change to Permit Condition D12.6 is as follows:

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

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

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

Clarification Regarding SCR Operating Temperature

The RECLAIM/Title V Facility Permit (Section H, Permit Condition D12.3, Device Numbers C4, C10, C16, C22, and C28) currently limits the inlet temperature for the gas turbine SCRs to between 715°F and 840°F. This SCR operating temperature range is appropriate during normal gas turbine operation. However, during gas turbine startups or shutdowns, there will be brief periods of time when the inlet SCR temperature will not be within the required temperature range. Therefore, WCE requests that a clarification be added to permit condition D12.3 to exclude gas turbine startups/shutdowns from this SCR operating temperature requirement. Because this change will have no impact on other permit requirements (i.e., emission limits, operating limits, monitoring/testing requirements, reporting requirements, etc.), WCE believes this change qualifies as a change of condition with no engineering evaluation needed under Rule 301¹ for fee purposes and qualifies as a minor Title V change under Regulation XXX.² The requested change to Permit Condition D12.3 is as follows:

D12.3 The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the exhaust at the inlet to the SCR reactor.

...~~Excluding gas turbine startups and shutdowns,~~ The catalyst temperature range shall remain between 715 degrees F and 840 degrees F...

¹ SCAQMD Rule 301(c)(3)(C)

² SCAQMD Rule 3000(b)(15)

Clarification Regarding PM_{2.5} Emission Tests

The RECLAIM/Title V Facility Permit (Section H, Permit Conditions D29.1 for Device Numbers D1, D7, D13, D19 and D25) currently states that source tests will be conducted when the equipment operates at 100, 75, and 50 percent loads, with the exception of PM₁₀ testing. PM₁₀ emission testing is required to be conducted only at 100 percent operating load. This exception is required for PM₁₀ testing due to the extended amount of sampling time for PM₁₀ source tests. Since PM₁₀ and PM_{2.5} emission source tests require the same amount of sampling time, we believe that this exception should also apply to the PM_{2.5} source tests. Therefore, WCE requests that a clarification be added to permit condition D29.1 to include PM_{2.5} source testing in the exception. Because this change will have no impact on other permit requirements (e.g., emission limits, operating limits, monitoring/testing requirements, reporting requirements, etc.), WCE believes this change qualifies as a change of condition with no engineering evaluation needed under Rule 301¹ for fee purposes and qualifies as a minor Title V change under Regulation XXX.² The requested change to Permit Condition D29.1 is as follows:

D29.1 *The operator shall conduct source test(s) for the pollutant(s) identified below.*

...

*The test shall be conducted when this equipment is operating at loads of 100, 75 and 50 percent, with the exception of PM₁₀ **and** PM_{2.5} testing. For PM₁₀ **and** PM_{2.5}, the test shall be conducted when this equipment is operating at a load of 100 percent.*

...

Addition of the Applicable Requirements from 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 60, Subpart IIII for the Emergency Fire Pump Engine

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for stationary reciprocating internal combustion engines (RICE) (Subpart ZZZZ) apply to all RICE located at both major and area sources. Therefore, this rule applies to the emergency fire pump Diesel engine operated by WCE. The emergency fire pump Diesel CI engine has a maximum power rating of 183 bhp, and is certified as a Tier 3 engine by the EPA.³ Because the fire pump was installed at the WCEP in 2012, it is considered a new stationary RICE pursuant to 40 CFR 63.6590 (a)(2)(iii).⁴

Under 40 CFR 63.6590(c), a new RICE located at an area source with a rating of less than or equal to 500 bhp is allowed to comply with NESHAP Subpart ZZZZ by complying with the applicable requirements of 40 CFR 60 Subpart IIII for compression ignition engines. The emergency fire pump Diesel engine at WCEP qualifies for this compliance option. A review of the current SCAQMD permit shows that most of the applicable requirements of 40 CFR Part 60, Subpart IIII for the emergency fire pump engine are already included as permit conditions. The only Subpart IIII requirement not specifically

³ The fire pump engine is a certified Tier 3 engine under engine family CJDY306.8120.

⁴ 40 CFR 63.6590 (a)(2)(iii) states that "[a] stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006."

required in the SCAQMD permit for the emergency fire pump engine is the use of ultra-low sulfur Diesel fuel (40 CFR 60.4207). WCE proposes that for clarification purposes, the Diesel fuel sulfur content be added to the permit conditions. Because this change will have no impact on other permit requirements (i.e., emission limits, operating limits, monitoring/testing requirements, reporting requirements, etc.), WCE believes this change qualifies as a change of condition with no engineering evaluation needed under Rule 301¹ for fee purposes and qualifies as a minor Title V change under Regulation XXX². The requested additional permit condition is as follows:

The operator shall not use any Diesel fuel unless the fuel is low sulfur Diesel for which the sulfur content shall not exceed 15 ppm by weight as supplied by the supplier.

Permit Application Fee

Enclosed are the SCAQMD application forms for the requested changes to the permit conditions. Also enclosed is a check in the amount of \$ 8,334.03 payable to the District to cover the filing fee for the requested permit change. The amount of this filing fee was determined based on the SCAQMD's online permit application filing fee calculator (SCAQMD Fee Sheet is also included in Appendix I), as summarized below.

- Change of condition for SCR operating temperature for first SCR (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule C, Re-Issuance Fee): \$ 792.43
- Change of condition for SCR operating temperature for the remaining four SCR (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule C, Re-Issuance Fee, and 50% discount for each SCR for identical units per SCAQMD Rule 301(c)(1)(F)): \$ 1,584.88
- Change of condition for PM_{2.5} source testing for first gas turbine (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule G, Re-Issuance Fee): \$ 792.43
- Change of condition for PM_{2.5} source testing for the remaining four gas turbines (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule G, Re-Issuance Fee, and 50% discount for each SCR for identical units per SCAQMD Rule 301(c)(1)(F)): \$ 1,584.88
- Change of condition for the emergency fire pump engine for the removal of the calibration requirement for the fuel flow meter (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule B, Re-Issuance Fee): \$ 792.43
- Change of condition for the addition of the 40 CFR Part 60 Subpart IIII Diesel fuel sulfur requirement for the fire pump engine (change of condition per SCAQMD Rule 301(c)(3)(C), Equipment Schedule G, Re-Issuance Fee): \$ 792.43

- Title V/RECLAIM permit change of conditions (Facility Permit Amendment for application with no engineering evaluation per SCAQMD Rule 301(l)(5)): \$1,994.55
- Total fee required: \$ 8,334.03

If you have any questions or need further information, please don't hesitate to contact me at (626) 968-0360.

Sincerely,



Heather MacLeod
Environmental Specialist

Attachments

WCEP O&M File: 3.3.2.2

cc: Camille Remy Obad, CEC
CEC Dockets (05-AFC-2C)
Rick McPherson, NRG Energy
George Piantka, NRG Energy
Apeetha Jain, NRG Energy
Tom Andrews, Sierra Research

ATTACHMENT I

SCAQMD APPLICATION FORMS AND FEE SHEET

SCAQMD Permit Processing Fees Portal

Hide Tooltip

Fee Sheet

Below are the permit fees calculated based on the information entered. Click the "Print" button to print the Fee Sheet for your records.

Print

Restart

Permit Unit

IC Engine, Emergency, 51 - 500 HP \$792.43

Permit Unit

IC Engine, Emergency, 51 - 500 HP \$792.43

Permit Unit

Selective Catalytic Reduction (SCR) \$792.43

Selective Catalytic Reduction (SCR) (4 Identical) \$1,584.88

Permit Unit

Gas Turbine, 50 MW, other fuel \$792.43

Gas Turbine, 50 MW, other fuel (4 Identical) \$1,584.88

Facility Permit Revision Fee

Administrative Permit Revision Fee \$1,994.55

Summary

Permit Fees \$6,339.48

Expedited Processing Fees \$0.00

Higher Fees \$0.00

Small Business Discount \$0.00

Total: \$8,334.03

Back

Generate Voucher



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944, Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address

4. Equipment Location Is: Fixed Location (For equipment operated at various locations, provide address of initial site.)
911 Bixby Dr
Street Address
City of Industry, CA 91745
City Zip
Heather MacLeod Environmental Specialist
Contact Name Title
(626) 968-0360 (626) 968-0379
Phone # Ext. Fax #
E-Mail: Heather.MacLeod@nrg.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:
[X] Check here if same as equipment location address
911 Bixby Dr
Address
City of Industry, CA 91745
City State Zip
Heather MacLeod Environmental Specialist
Contact Name Title
(626) 968-0360 (626) 968-0379
Phone # Ext. Fax #
E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: Not In RECLAIM or Title V In RECLAIM In Title V In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application:
7b. Facility Permits:
7c. Equipment or Process with an Existing/Previous Application or Permit:
Existing or Previous Permit/Application
If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number.

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule):
Title V minor changes of conditions with no engineering evaluation
10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process)

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are \$500,000 or less OR a not-for-profit training center)
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? If Yes, provide NOV/NC#:

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location?
electric generation
14. What is your business primary NAICS Code? (North American Industrial Classification System) 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?
16. Are there any schools (K-12) within 1000 feet of the facility property line?

Section F - Authorization/Signature

17. Signature of Responsible Official:
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.)
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? (If Yes, see instructions.)

23. Check List: [X] Authorized Signature/Date [X] Form 400-CEQA [] Supplemental Form(s) (ie., Form 400-E-xx) [X] Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED \$, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944, Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address / Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location (911 Bixby Dr, City of Industry, CA 91745)
5. Permit and Correspondence Information: Check here if same as equipment location address (911 Bixby Dr, City of Industry, CA 91745)
Contact Name: Heather MacLeod, Title: Environmental Specialist, Phone: (626) 968-0360, Fax: (626) 968-0379, E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application: Equipment Operating Without A Permit
7c. Equipment or Process with an Existing/Previous Application or Permit: Change of Condition
Existing or Previous Permit/Application: 538809

7b. Facility Permits: RECLAIM Facility Permit Amendment
*A Higher Permit Processing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(i)).

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Selective Catalytic Reduction for GT 1, Device C4
10. For identical equipment, how many additional applications are being submitted with this application? 4

11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature

17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944

Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address / Section C - Permit Mailing Address
4. Equipment Location Is: Fixed Location (911 Bixby Dr)
5. Permit and Correspondence Information: (911 Bixby Dr)
Contact Name: Heather MacLeod, Title: Environmental Specialist, Phone: (626) 968-0360, Fax: (626) 968-0379, E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type
6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):
7a. New Equipment or Process Application: Streamlined Standard Permit
7b. Facility Permits: RECLAIM Facility Permit Amendment
7c. Equipment or Process with an Existing/Previous Application or Permit: Change of Condition
Existing or Previous Permit/Application Number: 538811

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Selective Catalytic Reduction for GT 2, Device C10
10. For identical equipment, how many additional applications are being submitted with this application? 4

11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature
17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Supplemental Form(s) (ie., Form 400-E-xx), Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944, Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
3. Owner's Business Name (If different from Business Name of Operator):
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536

Section B - Equipment Location Address / Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location (911 Bixby Dr, City of Industry, CA 91745)
5. Permit and Correspondence Information: Check here if same as equipment location address (911 Bixby Dr, City of Industry, CA 91745)
Contact Name: Heather MacLeod, Title: Environmental Specialist, Phone: (626) 968-0360, Fax: (626) 968-0379, E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application:
7b. Facility Permits: RECLAIM Facility Permit Amendment
7c. Equipment or Process with an Existing/Previous Application or Permit: Change of Condition
Existing or Previous Permit/Application: 538812

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Selective Catalytic Reduction for GT 3, Device C16
10. For identical equipment, how many additional applications are being submitted with this application? 4

11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature

17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Supplemental Form(s) (ie., Form 400-E-xx), Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944, Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address
4. Equipment Location Is: Fixed Location
911 Bixby Dr
City of Industry, CA 91745
Contact Name: Heather MacLeod, Environmental Specialist
Phone #: (626) 968-0360, Fax #: (626) 968-0379
E-Mail: Heather.MacLeod@nrg.com
Section C - Permit Mailing Address
5. Permit and Correspondence Information:
911 Bixby Dr
City of Industry, CA 91745
Contact Name: Heather MacLeod, Environmental Specialist
Phone #: (626) 968-0360, Fax #: (626) 968-0379
E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type
6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):
7a. New Equipment or Process Application:
7b. Facility Permits:
7c. Equipment or Process with an Existing/Previous Application or Permit:
Existing or Previous Permit/Application
If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number: 538816

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):
9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Selective Catalytic Reduction for GT 4, Device C22
10. For identical equipment, how many additional applications are being submitted with this application? 4
11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature
17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Fees Enclosed
AQMD USE ONLY
APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION
DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944. Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC. 2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536. 3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address / Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location. 5. Permit and Correspondence Information: Check here if same as equipment location address. 911 Bixby Dr, City of Industry, CA 91745. Contact Name: Heather MacLeod, Environmental Specialist. Phone: (626) 968-0360. E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application: Change of Condition. 7b. Facility Permits: RECLAIM Facility Permit Amendment. 7c. Equipment or Process with an Existing/Previous Application or Permit: Existing or Previous Permit/Application. If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number: 538825.

8a. Estimated Start Date of Construction (mm/dd/yyyy): 8b. Estimated End Date of Construction (mm/dd/yyyy): 8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Selective Catalytic Reduction for GT 5, Device C28. 10. For identical equipment, how many additional applications are being submitted with this application? 4

11. Are you a Small Business as per AQMD's Rule 102 definition? No. 12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No. If Yes, provide NOV/NC#:

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation. 14. What is your business primary NAICS Code? 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No. 16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature

17. Signature of Responsible Official: Rick McPherson. 18. Title of Responsible Official: Plant Manager. 19. I wish to review the permit prior to issuance. Yes. 20. Print Name: Rick McPherson. 21. Date: 1/14/16. 22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944

Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address / Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location (911 Bixby Dr, City of Industry, CA 91745, Heather MacLeod, Environmental Specialist)
5. Permit and Correspondence Information: Check here if same as equipment location address (911 Bixby Dr, City of Industry, CA 91745, Heather MacLeod, Environmental Specialist)

Section D - Application Type

6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application: Equipment Operating Without A Permit
7c. Equipment or Process with an Existing/Previous Application or Permit: Change of Condition
Existing or Previous Permit/Application: 538796

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Gas turbine 1, Device D1
10. For identical equipment, how many additional applications are being submitted with this application? 4

11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature

17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Supplemental Form(s), Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REG, DATE, APP REG, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.



Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944

Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address / Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location (911 Bixby Dr, City of Industry, CA 91745)
5. Permit and Correspondence Information: Check here if same as equipment location address (911 Bixby Dr, City of Industry, CA 91745)
Contact Name: Heather MacLeod, Environmental Specialist
Phone #: (626) 968-0360, Fax #: (626) 968-0379
E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application: Compliance Plan
7c. Equipment or Process with an Existing/Previous Application or Permit: Change of Condition
Existing or Previous Permit/Application: 538801

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Gas turbine 2, Device D7
10. For identical equipment, how many additional applications are being submitted with this application? 4

11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature

17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Supplemental Form(s) (ie., Form 400-E-xx), Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944

Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information
1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address
4. Equipment Location Is: Fixed Location
911 Bixby Dr
City of Industry, CA 91745
Heather MacLeod, Environmental Specialist
(626) 968-0360
E-Mail: Heather.MacLeod@nrg.com
Section C - Permit Mailing Address
5. Permit and Correspondence Information:
911 Bixby Dr
City of Industry, CA 91745
Heather MacLeod, Environmental Specialist
(626) 968-0360
E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type
6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):
7a. New Equipment or Process Application:
7c. Equipment or Process with an Existing/Previous Application or Permit:
Existing or Previous Permit/Application
If you checked any of the items in 7c, you MUST provide an existing Permit or Application Number: 538804

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Gas turbine 3, Device D13
10. For identical equipment, how many additional applications are being submitted with this application? 4
11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information
13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature
17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Supplemental Form(s) (ie., Form 400-E-xx), Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED \$, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

South Coast AQMD

Mail To: SCAQMD P.O. Box 4944 Diamond Bar, CA 91765-0944

Tel: (909) 396-3385 www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location Various Location
5. Permit and Correspondence Information: Check here if same as equipment location address
911 Bixby Dr
Street Address
City of Industry CA 91745
City State Zip
Heather MacLeod Environmental Specialist
Contact Name Title
(626) 968-0360 (626) 968-0379
Phone # Ext. Fax #
E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: Not In RECLAIM or Title V In RECLAIM In Title V In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application:
7c. Equipment or Process with an Existing/Previous Application or Permit:
Existing or Previous Permit/Application
If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number: 538807

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Gas turbine 4, Device D19
10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process) 4

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are \$500,000 or less OR a not-for-profit training center) No Yes
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? If Yes, provide NOV/NC#: No Yes

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? (North American Industrial Classification System) 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No Yes
16. Are there any schools (K-12) within 1000 feet of the facility property line? No Yes

Section F - Authorization/Signature I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.) No Yes

20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? (If Yes, see instructions.) No Yes

23. Check List: Authorized Signature/Date Form 400-CEQA Supplemental Form(s) (ie., Form 400-E-xx) Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED \$, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.



Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944

Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address | Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location (911 Bixby Dr)
5. Permit and Correspondence Information: Check here if same as equipment location address (911 Bixby Dr)
Contact Name: Heather MacLeod, Title: Environmental Specialist, Phone: (626) 968-0360, Fax: (626) 968-0379, E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application: Compliance Plan
7c. Equipment or Process with an Existing/Previous Application or Permit: Change of Condition
Existing or Previous Permit/Application: 538808

8a. Estimated Start Date of Construction:
8b. Estimated End Date of Construction:
8c. Estimated Start Date of Operation:

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Gas turbine 5, Device D25
10. For identical equipment, how many additional applications are being submitted with this application? 4

11. Are you a Small Business as per AQMD's Rule 102 definition? No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature

17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. Yes
20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

Mail To: SCAQMD, P.O. Box 4944, Diamond Bar, CA 91765-0944, Tel: (909) 396-3385, www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536
3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address / Section C - Permit Mailing Address

4. Equipment Location Is: Fixed Location (911 Bixby Dr, City of Industry, CA 91745)
5. Permit and Correspondence Information: Check here if same as equipment location address (911 Bixby Dr, City of Industry, CA 91745)
Contact Name: Heather MacLeod, Title: Environmental Specialist, Phone: (626) 968-0360, Fax: (626) 968-0379, E-Mail: Heather.MacLeod@nrg.com

Section D - Application Type

6. The Facility Is: In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application: New Construction, Equipment On-Site But Not Constructed or Operational, Equipment Operating Without A Permit, Compliance Plan, Registration/Certification, Streamlined Standard Permit
7b. Facility Permits: RECLAIM Facility Permit Amendment
7c. Equipment or Process with an Existing/Previous Application or Permit: Change of Condition, Change of Location, Equipment Operating with an Expired/Inactive Permit
Existing or Previous Permit/Application: 450908

8a. Estimated Start Date of Construction (mm/dd/yyyy):
8b. Estimated End Date of Construction (mm/dd/yyyy):
8c. Estimated Start Date of Operation (mm/dd/yyyy):

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Emergency fire pump engine, Device 34
10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process)

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are \$500,000 or less OR a not-for-profit training center) No
12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? No

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location? electric generation
14. What is your business primary NAICS Code? (North American Industrial Classification System) 221112

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? No
16. Are there any schools (K-12) within 1000 feet of the facility property line? No

Section F - Authorization/Signature

17. Signature of Responsible Official: Rick McPherson
18. Title of Responsible Official: Plant Manager
19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.) Yes

20. Print Name: Rick McPherson
21. Date: 1/14/16
22. Do you claim confidentiality of data? (If Yes, see instructions.) No

23. Check List: Authorized Signature/Date, Form 400-CEQA, Supplemental Form(s) (ie., Form 400-E-xx), Fees Enclosed

Table with columns: AQMD USE ONLY, APPLICATION TRACKING #, CHECK #, AMOUNT RECEIVED, PAYMENT TRACKING #, VALIDATION, DATE, APP REJ, DATE, APP REJ, CLASS I III, BASIC CONTROL, EQUIPMENT CATEGORY CODE, TEAM, ENGINEER, REASON/ACTION TAKEN



South Coast Air Quality Management District

Form 400-CEQA

California Environmental Quality Act (CEQA) Applicability

Mail To:
 SCAQMD
 P.O. Box 4944
 Diamond Bar, CA 91765-0944
 Tel: (909) 396-3385
 www.aqmd.gov

The SCAQMD is required by state law, the California Environmental Quality Act (CEQA), to review discretionary permit project applications for potential air quality and other environmental impacts. This form is a screening tool to assist the SCAQMD in clarifying whether or not the project¹ has the potential to generate significant adverse environmental impacts that might require preparation of a CEQA document [CEQA Guidelines §15060(a)].² Refer to the attached instructions for guidance in completing this form.³ For each Form 400-A application, also complete and submit one Form 400-CEQA. If submitting multiple Form 400-A applications for the same project at the same time, only one 400-CEQA form is necessary for the entire project. If you need assistance completing this form, contact Permit Services at (909) 396-3385 or (909) 396-2668.


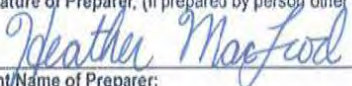
Section A - Facility Information	
1. Facility Name (Business Name of Operator To Appear On The Permit): <u>Walnut Creek Energy, LLC</u>	2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): <u>146536</u>
3. Project Description: <u>Title V minor changes of conditions with no engineering evaluation</u>	

Section B - Review For Exemption From Further CEQA Action		
Check "Yes" or "No" as applicable		
	Yes	No
1.	<input checked="" type="radio"/>	<input type="radio"/>
2.	<input type="radio"/>	<input checked="" type="radio"/>
3.	<input type="radio"/>	<input checked="" type="radio"/>
4.	<input type="radio"/>	<input checked="" type="radio"/>
5.	<input type="radio"/>	<input checked="" type="radio"/>
6.	<input type="radio"/>	<input checked="" type="radio"/>
7.	<input type="radio"/>	<input checked="" type="radio"/>
8.	<input type="radio"/>	<input checked="" type="radio"/>

If "Yes" is checked for any question in Section B, your application does not require additional evaluation for CEQA applicability. Skip to Section D - Signatures on page 2 and sign and date this form.

Section C - Review of Impacts Which May Trigger CEQA		
Complete Parts I-VI by checking "Yes" or "No" as applicable. To avoid delays in processing your application(s), explain all "Yes" responses on a separate sheet and attach it to this form.		
	Yes	No
Part I - General		
1.	<input type="radio"/>	<input type="radio"/>
2.	<input type="radio"/>	<input type="radio"/>
Part II - Air Quality		
3.	<input type="radio"/>	<input type="radio"/>
4.	<input type="radio"/>	<input type="radio"/>

¹ A "project" means the whole of an action which has a potential for resulting in physical change to the environment, including construction activities, clearing or grading of land, improvements to existing structures, and activities or equipment involving the issuance of a permit. For example, a project might include installation of a new, or modification of an existing internal combustion engine, dry-cleaning facility, boiler, gas turbine, spray coating booth, solvent cleaning tank, etc.
² To download the CEQA guidelines, visit http://ceres.ca.gov/env_law/state.html.
³ To download this form and the instructions, visit <http://www.aqmd.gov/ceqa> or <http://www.aqmd.gov/permit>

Section C - Review of Impacts Which May Trigger CEQA (cont.)			
	Yes	No	Part II - Air Quality (cont.)
5.	<input type="radio"/>	<input type="radio"/>	Would this project result in noticeable off-site odors from activities that may not be subject to SCAQMD permit requirements? For example, compost materials or other types of greenwaste (i.e., lawn clippings, tree trimmings, etc.) have the potential to generate odor complaints subject to Rule 402 – Nuisance.
6.	<input type="radio"/>	<input type="radio"/>	Does this project cause an increase of emissions from marine vessels, trains and/or airplanes?
7.	<input type="radio"/>	<input type="radio"/>	Will the proposed project increase the QUANTITY of hazardous materials stored aboveground onsite or transported by mobile vehicle to or from the site by greater than or equal to the amounts associated with each compound on the attached Table 1? ⁴
Part III – Water Resources			
8.	<input type="radio"/>	<input type="radio"/>	Will the project increase demand for water at the facility by more than 5,000,000 gallons per day? The following examples identify some, but not all, types of projects that may result in a "yes" answer to this question: 1) projects that generate steam; 2) projects that use water as part of the air pollution control equipment; 3) projects that require water as part of the production process; 4) projects that require new or expansion of existing sewage treatment facilities; 5) projects where water demand exceeds the capacity of the local water purveyor to supply sufficient water for the project; and 6) projects that require new or expansion of existing water supply facilities.
9.	<input type="radio"/>	<input type="radio"/>	Will the project require construction of new water conveyance infrastructure? Examples of such projects are when water demands exceed the capacity of the local water purveyor to supply sufficient water for the project, or require new or modified sewage treatment facilities such that the project requires new water lines, sewage lines, sewage hook-ups, etc.
Part IV – Transportation/Circulation			
10.	Will the project result in (Check all that apply):		
	<input type="radio"/>	<input type="radio"/>	a. the need for more than 350 new employees?
	<input type="radio"/>	<input type="radio"/>	b. an increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round-trips per day?
	<input type="radio"/>	<input type="radio"/>	c. increase customer traffic by more than 700 visits per day?
Part V – Noise			
11.	<input type="radio"/>	<input type="radio"/>	Will the project include equipment that will generate noise GREATER THAN 90 decibels (dB) at the property line?
Part VI – Public Services			
12.	Will the project create a permanent need for new or additional public services in any of the following areas (Check all that apply):		
	<input type="radio"/>	<input type="radio"/>	a. Solid waste disposal? Check "No" if the projected potential amount of wastes generated by the project is less than five tons per day.
	<input type="radio"/>	<input type="radio"/>	b. Hazardous waste disposal? Check "No" if the projected potential amount of hazardous wastes generated by the project is less than 42 cubic yards per day (or equivalent in pounds).
REMINDER: For each "Yes" response in Section C, attach all pertinent information including but not limited to estimated quantities, volumes, weights, etc.			
Section D - Signatures			
I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT THIS FORM IS A SCREENING TOOL AND THAT THE SCAQMD RESERVES THE RIGHT TO CONSIDER OTHER PERTINENT INFORMATION IN DETERMINING CEQA APPLICABILITY.			
1. Signature of Responsible Official of Firm: 		2. Title of Responsible Official of Firm: Plant Manager	
3. Print Name of Responsible Official of Firm: Rick McPherson		4. Date Signed: 1/14/16	
5. Phone # of Responsible Official of Firm: (626) 968-0360	6. Fax # of Responsible Official of Firm: (626) 968-0379	7. Email of Responsible Official of Firm: Rick.McPherson@nrg.com	
8. Signature of Preparer. (If prepared by person other than responsible official of firm): 		9. Title of Preparer: Environmental Specialist	
10. Print Name of Preparer: Heather MacLeod		11. Date Signed: 1/14/16	
12. Phone # of Preparer: (626) 968-0360	13. Fax # of Preparer: (626) 968-0379	14. Email of Preparer: Heather.MacLeod@nrg.com	

THIS CONCLUDES FORM 400-CEQA. INCLUDE THIS FORM AND ANY ATTACHMENTS WITH FORM 400-A.

⁴ Table 1 – Regulated Substances List and Threshold Quantities for Accidental Release Prevention can be found in the Instructions for Form 400-CEQA.

ATTACHMENT

California Energy Commission (CEC) Adoption Order for
Walnut Creek Energy Park (05-AFC-2)

**CALIFORNIA
ENERGY
COMMISSION**

WALNUT CREEK ENERGY PARK

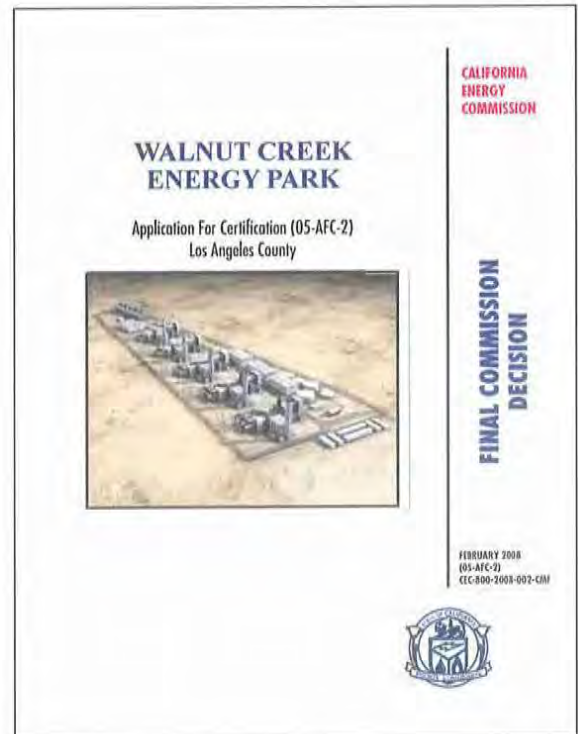
**Application For Certification (05-AFC-2)
Los Angeles County**



**FINAL COMMISSION
DECISION**

**FEBRUARY 2008
(05-AFC-2)
CEC-800-2008-002-CMF**





CALIFORNIA ENERGY COMMISSION

1516 9th Street
Sacramento, CA 95814

www.energy.ca.gov/sitingcases/walnutcreek/index.html



JACKALYNE PFANNENSTIEL
Chair, Presiding Member

COMMISSIONERS-

JAMES D. BOYD
Vice Chair

ARTHUR H. ROSENFELD, Ph. D.
Commissioner

JEFFREY D. BYRON
Commissioner

KAREN DOUGLAS
Commissioner

GARRET SHEAN
Hearing Officer

RAOUL RENAUD
Hearing Officer

TABLE OF CONTENTS

EXECUTIVE SUMMARY	3
PROJECT DESCRIPTION	5
ENVIRONMENTAL QUALITY	
Air Quality	11
Biology	55
Cultural Resources	65
Geology & Paleontology	83
Hazardous Materials.....	95
Land Use	109
Noise.....	115
Public Health.....	133
Socioeconomics	139
Traffic & Transportation.....	147
Visual Resources.....	165
Waste Management.....	187
Water Quality & Soils	199
Water Resources	211
Alternatives	219
ENGINEERING & TRANSMISSION	
Efficiency.....	229
Facility Design	233
Reliability.....	257
Transmission Line Safety & Nuisance.....	263
Transmission System Engineering.....	273
Worker Safety	285
COMPLIANCE	295
ADOPTION ORDER.....	311

Page intentionally blank.

EXECUTIVE SUMMARY:

**APPROVED
WITH CONDITIONS**

The Energy Commission approves the proposed 500 megawatt Walnut Creek Energy Park in the City of Industry, California, together with the following highlighted measures to mitigate potential environmental and community impacts and comply with applicable laws, ordinances, regulations and standards (LORS):

ENERGY RESOURCES:

- ✓ The proposed project will use state-of-the-art GE LMS100 technology resulting in optimized resource efficiency.

AIR QUALITY

- ✓ The power plant will use state-of-the-art Best Available Control Technology to minimize emissions.
- ✓ Offsets and RECLAIM credits will be used to compensate for any pollutant for which the South Coast Air Quality Management District determines that it is in non-attainment.

VISUAL

- ✓ There is no significant visual impact for hillside residents of Puente Hills and Hacienda Heights, since they generally look from a distance across the valley over the project.

NOISE

- ✓ In the event of a noise complaint due to rare overnight operation, the Applicant will limit overnight operation to render the project barely audible at 49 dBA.

PROJECT BENEFITS

- ✓ Average of 220 direct project-related construction jobs.
- ✓ Total capital costs of \$220-280 million.
- ✓ Construction payroll of \$28.6 million.
- ✓ Operation payroll is \$630,000.
- ✓ Property taxes of \$3.9 to \$4.5 million.
- ✓ Total sales and use tax during construction of \$14.8 million.
- ✓ Local sales tax of \$247,500 annually
- ✓ \$6 to 9 million spent locally for construction materials.
- ✓ \$3 million annual operation budget.



**CALIFORNIA
ENERGY
COMMISSION**

1516 Ninth Street
Sacramento, CA 95814
800-822-6228
www.energy.ca.gov

ADOPTION ORDER

**WALNUT CREEK ENERGY PARK
APPLICATION FOR CERTIFICATION
DOCKET NO. 05-AFC-2**

This Order adopts the Commission Decision on the Walnut Creek, LLC., Walnut Creek Energy Park. It incorporates the Presiding Member's Proposed Decision. The Commission Decision is based upon the evidentiary record of this proceeding and considers comments received at the Commission Business Meeting. The text of the attached Commission Decision contains a summary of the evidence and the rationale for the Findings and Conditions

This Order adopts by reference the text, Conditions of Certification, and Compliance Verifications contained in the Commission Decision. It also adopts specific requirements contained in the Commission Decision which ensure the proposed facility will be designed, constructed, and operated in a manner to protect environmental quality, to assure public health and safety, and to operate in a safe and reliable manner.

Findings

The Commission hereby adopts the following findings in addition to those contained in the accompanying text:

1. The project will provide a degree of economic benefits and electricity reliability to the local area.
2. The Conditions of Certification contained in this Decision, if implemented by the project owner, ensure that the whole of the project will be designed, constructed, and operated in conformity with applicable local, regional, state, and federal laws, ordinances, regulations, and standards, including applicable public health and safety standards, and air and water quality standards.
3. Implementation of the Conditions of Certification contained in the accompanying text will ensure protection of environmental quality and assure reasonably safe and reliable operation of the facility. The Conditions of Certification also assure that the project will neither result in, nor contribute substantially to, any significant direct, indirect, or cumulative adverse environmental impacts.
4. Existing governmental land use restrictions are sufficient to adequately control population density in the area surrounding the facility and may be reasonably expected to ensure public health and safety.

5. Construction and operation of the project, as mitigated, will not create any adverse environmental impacts. Therefore, the evidence of record also establishes that no feasible alternatives to the project, as described during this proceeding, exist which would reduce or eliminate any significant environmental impacts of the mitigated project.
6. The evidence of record does not establish the existence of any environmentally superior alternative site.
7. The evidence of record establishes that an environmental justice screening analysis was conducted and that the project, as mitigated, will not have a disproportionate impact on low-income or minority populations.
8. The Decision contains a discussion of the public benefits of the project as required by Public Resources Code section 25523(h).
9. This Decision contains measures to ensure that the planned, temporary, or unexpected closure of the project will occur in conformance with applicable laws, ordinances, regulations, and standards.
10. The proceedings leading to this Decision have been conducted in conformity with the applicable provisions of Commission regulations governing the consideration of an Application for Certification and thereby meet the requirements of Public Resources Code, sections 21000 et seq., and 25500 et seq.

Therefore, the Commission **ORDERS** the following:

1. The Application for Certification of the Walnut Creek Energy Park in the City of Industry, California, as described in this Decision, is hereby approved, and a certificate to construct and operate the project is hereby granted.
2. The approval of the Application for Certification is subject to the timely performance of the Conditions of Certification and Compliance Verifications enumerated in the accompanying text. The Conditions and Compliance Verifications are integrated with this Decision and are not severable therefrom. While the project owner may delegate the performance of a Condition or Verification, the duty to ensure adequate performance of a Condition or Verification may not be delegated.
3. The decision is adopted, issued, effective and final on October 10, 2007.
4. Reconsideration of this Decision is governed by Public Resources Code, section 25530.
5. Judicial review of this Decision is governed by Public Resources Code, section 25531.
6. The Commission hereby adopts the Conditions of Certification, Compliance Verifications, and associated dispute resolution procedures as part of this Decision in

order to implement the compliance monitoring program required by Public Resources Code section 25532. All Conditions in this Decision take effect immediately upon adoption and apply to all construction and site preparation activities including, but not limited to, ground disturbance, site preparation, and permanent structure construction.

7. The Executive Director of the Commission or delegatee shall transmit a copy of this Decision and appropriate accompanying documents as provided by Public Resources Code section 25537 and California Code of Regulations, title 20, section 1768.

Dated: February 27, 2008, at Sacramento, California.



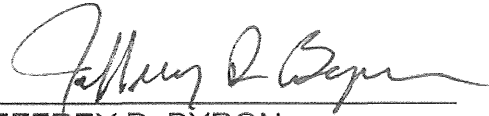
JACKALYNE PFANNENSTIEL
Chairman

- Absent -

JAMES D. BOYD
Vice Chair



ARTHUR H. ROSENFELD
Commissioner



JEFFREY D. BYRON
Commissioner



KAREN DOUGLAS
Commissioner



South Coast Air Quality Management District
Form 500-A2
Title V Application Certification

Mail To:
 SCAQMD
 P.O. Box 4944
 Diamond Bar, CA 91765-0944
 Tel: (909) 396-3385
 www.aqmd.gov

Section I - Operator Information

1. **Facility Name** (Business Name of Operator That Appears On Permit):
 Walnut Creek Energy, LLC

2. **Valid AQMD Facility ID** (Available On Permit Or Invoice Issued By AQMD):
 146536

3. This Certification is submitted with a (Check one):
 a. Title V Application (Initial, Revision or Renewal)
 b. Supplement/Correction to a Title V Application
 c. MACT Part 1

4. Is Form 500-C2 included with this Certification? Yes No

Section II - Responsible Official Certification Statement

Read each statement carefully and check each that applies – You must check 3a or 3b.

1. **For Initial, Permit Renewal, and Administrative Application Certifications:**

a. The facility, including equipment that are exempt from written permit per Rule 219, is currently operating and will continue to operate in compliance with all applicable requirement(s) identified in Section II and Section III of Form 500-C1,
 i. except for those requirements that do not specifically pertain to such devices or equipment and that have been identified as "Remove" on Section III of Form 500-C1.
 ii. except for those devices or equipment that have been identified on the completed and attached Form 500-C2 that will not be operating in compliance with the specified applicable requirement(s).
 b. The facility, including equipment that are exempt from written permit per Rule 219, will meet in a timely manner, all applicable requirements with future effective dates.

2. **For Permit Revision Application Certifications:**

a. The equipment or devices to which this permit revision applies, will in a timely manner comply with all applicable requirements identified in Section II and Section III of Form 500-C1.

3. **For MACT Hammer Certifications:**

a. The facility is subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63), also known as the MACT "hammer." The following information is submitted with a Title V application to comply with the Part 1 requirements of Section 112(j).
 b. The facility is not subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63).


Section III - Authorization/Signature

I certify under penalty of law that I am the responsible official for this facility as defined in AQMD Regulation XXX and that based on information and belief formed after reasonable inquiry, the statement and information in this document and in all attached application forms and other materials are true, accurate, and complete.

1. Signature of Responsible Official: 	2. Title of Responsible Official: Plant Manager
3. Print Name: Rick McPherson	4. Date: 1/14/16
5. Phone #: (626) 968-0360	6. Fax #: (626) 968-0379
7. Address of Responsible Official: 911 Bixby Dr	
Street #	City State Zip City of Industry CA 91745-1702

Acid Rain Facilities Only: Please Complete Section IV

Acid Rain facilities must certify their compliance status of the devices subject to applicable requirements under Title IV by an individual who meets the definition of Designated (or Alternate) Representative in 40 CFR Part 72.

Section IV - Designated Representative Certification Statement	
<p><i>For Acid Rain Facilities Only:</i> I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.</p>	
1. Signature of Designated Representative or Alternate: 	2. Title of Designated Representative or Alternate: Plant Manager
3. Print Name of Designated Representative or Alternate: Rick McPherson	4. Date: 1/19/16
5. Phone #: (626) 968-0360	6. Fax #: (626) 968-0379
7. Address of Designated Representative or Alternate:	
911 Bixby Dr	City of Industry CA 91745-1702
Street #	City State Zip



This form shall be completed by Acid Rain facilities ONLY and shall accompany all requests for Phase II permit actions unique to Acid Rain facilities. Also attach a completed Form 500-A2. In addition, if an initial Title V permit, permit renewal, or permit revision is requested, attach Form 500-A1 and any supplemental Acid Rain forms (Forms 500-F2, 500-F3, and 500-F4), as appropriate.

Section I - General Information

1. Facility Name (Business Name of Operator That Appears On Permit): Walnut Creek Energy, LLC
2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 146536

3. ORIS Code (5-Digit): 57515

- 4. This is an application for a (Check all that apply to the facility):
a. Phase II Acid Rain Permit or Revision (Complete Section II of this form)
b. Repowering Extension Plan or Revision (Complete Form 500-F2)
c. New Unit Exemption or Revision (Complete Form 500-F3)
d. Retired Unit Exemption or Revision (Complete Form 500-F4)

- 5. The requested permit action involves a(n) (Check one):
a. Administrative Permit Revision
b. Significant Permit Revision
c. Fast Track Permit Revision
d. Automatic Permit Revision
e. Other (specify): Minor Title V Change

6. For all applications requesting a permit revision, provide a general description of the proposed changes (Attach additional sheets as necessary):
- Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump
- Clarification that the inlet temperature requirements for the SCR do not apply during startup and shutdown periods
- Clarification/addition of applicable conditions from 40 CFR 60, Subpart IIII for the emergency fire pump engine

Section II - Phase II Acid Rain Device Summary

1. The following information is (Check one): a. New b. Revised

Table with 6 columns: AQMD Device #, EPA Unit #, Will device need a Repowering Extension Plan?, Has device started operations on or after 11/15/90?, Device Operations Start Date (mo/day/yr), For devices starting-up after 11/15/90, provide date when Monitoring Certification will begin (mo/day/yr). Rows contain Yes/No radio button options.

To complete this application, type or print the information in the appropriate blanks.

Section I - General Information

- Facility Name:** Provide the name of the legal entity that operates the facility.

AQMD Facility ID: Complete only if the facility has been issued a 6-digit identification or ID number by AQMD. If not, leave these boxes blank. An ID number will be assigned when the application is submitted.

ORIS Code: Provide the 5-digit code that has been assigned to facility by Department of Energy.
- Check all applicable boxes to indicate the type of Acid Rain application filed. If box 1a. is checked, complete Section II of this form. If box 1b. is checked, complete and attach Form 500-F2 - Title IV Phase II Acid Rain Repowering Extension Plan. If box 1c. is checked, complete and attach Form 500-F3 - Title IV Phase II Acid Rain New Unit Exemption Request. If box 1d. is checked, complete and attach Form 500-F4 - Title IV Phase II Acid Rain Retired Unit Exemption Request.
- Check one box that best represents the type of permit action requested. If box 1e. is checked, in the space provided identify any additional elements regarding the application or the facility that need to be considered during the processing of this application (i.e., Initial Title V Permit Application).
- If the application is a revision request, describe in general terms the changes that are proposed in the application revision request. Attach additional sheets as necessary.

Section II - Phase II Acid Rain Device Summary

- Before completing this section, check one box to indicate whether this is a new application or a revision.

AQMD Device #:	Provide the identification number for each AQMD-assigned device subject to Phase II requirements.
EPA Unit #:	Provide the identification number for each EPA-assigned device subject to Phase II requirements.
Will device need a Repowering Extension Plan?:	Indicate with a "yes" or "no" if the device is or will be participating under a Repowering Extension Plan.
Has device started operations on or after 11/15/90?:	Indicate with a "yes" or "no" if the device was source tested or started operating on or after November 15, 1990.
Device Operations Start Date:	Complete this column <u>only</u> if the device was source tested or started operating on or after November 15, 1990. Provide the date (mo/day/yr) when the device started or will start operating. Note: If the date of beginning operations changes, an administrative permit revision application will be required.
For Devices starting-up after 11/15/90, provide date when Monitoring Certification will begin:	Complete this column <u>only</u> if the device was source tested or started operating on or after November 15, 1990. Provide the date (mo/day/yr) when compliance with the monitoring procedures for the device will begin. Refer to 40 CFR Part 75.4 to determine this date. Note: If the monitoring certification date changes, an administrative permit revision application will be required.

Attachment 2
Minor Title V Permit Change Request
(June 28, 2016)

June 28, 2016

Brian L. Yeh
Sr. Air Quality Engineering Manager
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: **Walnut Creek Energy Park - Facility ID 146536**
RECLAIM/Title V Facility Permit

Dear Mr. Yeh:

On January 19, 2016, Walnut Creek Energy, LLC (WCE) submitted a permit application package to the SCAQMD requesting several changes to conditions in the RECLAIM/Title V permit for the Walnut Creek Energy Park (WCEP). In addition to these changes, we are requesting a change to the ammonia emission (i.e., "slip") limit in the WCEP RECLAIM/Title V permit for clarification purposes. In the equipment description/permit limit summary table in Section H of the WCEP RECLAIM/Title V permit, the ammonia slip limit is listed as 5 part per million by volume (ppmv) for Device Numbers C4, C10, C16, C22, and C28. However, in Section H of the RECLAIM/Title V permit Condition A195.4 refers to an ammonia emission limit of 5.0 ppmv (see Attachment 1). We believe that "5.0" is referenced in error in Section H of the WCEP permit. To support this position, we reviewed several recently issued SCAQMD permits. In the AES Huntington Beach permit (Permit to Operate issued June 3, 2016) ammonia emission limit is consistently referred to as 5 ppmv (see Attachment 2). A 5 ppmv ammonia slip limit is also consistently referred to in the SCAQMD permits for El Segundo Power (see Attachment 3) and CPV Sentinel (see Attachment 4) facilities. Furthermore, we believe that these permits represent that the Best Available Control Technology (BACT) limit for ammonia slip has been demonstrated to be 5 ppmv. Therefore, WCE requests SCAMD correct the WCEP ammonia emission limit to 5 ppmv in all areas where referenced (i.e., Section D and Section H), which will align this permit with other more recent permits such as AES Huntington Beach's. Specifically, WCE requests the following change to Permit Condition A195.4 (changes shown in strikethrough/underline format):

A195.4 The ~~5.0~~ 5 PPMV NH3 emission limit(s) is averaged over 60minutes at 15% O2, dry basis. The operator shall calculate and continuously record the NH 3 slip concentration using the following...

If you have any questions or need further information, please don't hesitate to contact Heather Macleod at (626) 968-0360, or George.Piantka@nrg.com at (760) 710-2156.

Sincerely,



George L. Piantka, PE
Sr. Director, Regulatory Environmental Services
NRG Energy, West Region

Attachments

cc: Christian Aviles, SCAQMD
Camille Remy Obad, CEC
Rick McPherson, NRG Energy
Heather MacLeod, NRG Energy
Apeetha Jain, NRG Energy
Tom Andrews, Sierra Research

ATTACHMENT 1

WALNUT CREEK ENERGY PARK PERMIT



FACILITY PERMIT TO OPERATE

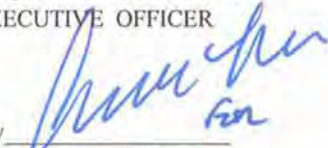
**WALNUT CREEK ENERGY, LLC
911 BIXBY DR
CITY OF INDUSTRY, CA 91745**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By 
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

TABLE OF CONTENTS

Section	Description	Revision #	Date Issued
A	Facility Information	2	10/31/2014
B	RECLAIM Annual Emission Allocation	7	01/01/2016
C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	1	05/04/2012
E	Administrative Conditions	1	05/04/2012
F	RECLAIM Monitoring and Source Testing Requirements	1	05/04/2012
G	Recordkeeping and Reporting Requirements for RECLAIM Sources	1	05/04/2012
H	Permit To Construct and Temporary Permit to Operate	2	09/28/2012
I	Compliance Plans & Schedules	1	05/04/2012
J	Air Toxics	1	05/04/2012
K	Title V Administration	1	05/04/2012
Appendix			
A	NO _x and SO _x Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	1	05/04/2012
B	Rule Emission Limits	1	05/04/2012



**FACILITY PERMIT TO OPERATE
WALNUT CREEK ENERGY, LLC**

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: WALNUT CREEK ENERGY, LLC

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 911 BIXBY DR
CITY OF INDUSTRY, CA 91745-1702

MAILING ADDRESS: 911 BIXBY DR
CITY OF INDUSTRY, CA 91745

RESPONSIBLE OFFICIAL: RICK MCPHERSON

TITLE: PLANT MANAGER

TELEPHONE NUMBER: (626) 968-0360

CONTACT PERSON: HEATHER MACLEOD

TITLE: ENVIRONMENTAL SPECIALIST

TELEPHONE NUMBER: (626) 968-0360

INITIAL TITLE V PERMIT ISSUED: May 05, 2011

TITLE V PERMIT EXPIRATION DATE: May 04, 2016

TITLE V	RECLAIM
YES	NOx: YES SOx: YES CYCLE: 1 ZONE: INLAND



**FACILITY PERMIT TO OPERATE
WALNUT CREEK ENERGY, LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
System 1: GAS TURBINES, POWER GENERATION					

- (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO. 1, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 538796 Permit to Construct Issued 09/28/12	D1	C3	NOX: MAJOR SOURCE**, SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988], CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 10.73 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005], NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 123.46 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT,	A63.1, A99.1, A99.2, A99.3, A99.4, A99.5, A195.1, A195.2, A195.3, A327.1, C1.1, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I298.1, I298.7, K40.1, K67.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (104 GROSS MW)				5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO.1, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 538809 Permit to Construct Issued: 09/28/12	C3	D1 C4			
SELECTIVE CATALYTIC REDUCTION, NO. 1, HALDOR-TOPSOE DNX-629, 1272 CU.FT.; WIDTH: 19 FT 6 IN; HEIGHT: 33 FT ; LENGTH: 2 FT 6 IN WITH A/N: 538809 Permit to Construct Issued: 09/28/12	C4	C3 S6		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID STACK, NO.1, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 538796 Permit to Construct Issued: 09/28/12	S6	C4			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO. 2, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 891 7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 538801 Permit to Construct Issued 09/28/12	D7	C9	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 10.73 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 123.46 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT.	A63.1, A99.1, A99.2, A99.3, A99.4, A99.5, A195.1, A195.2, A195.3, A327.1, C1.1, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I298.2, I298.8, K40.1, K67.1

- (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process I: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (104 GROSS MW)				5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO.2, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 538811 Permit to Construct Issued: 09/28/12	C9	D7 C10			
SELECTIVE CATALYTIC REDUCTION, NO. 2, HALDOR-TOPSOE DNX-629, 1272 CU.FT.; WIDTH: 19 FT 6 IN; HEIGHT: 33 FT ; LENGTH: 2 FT 6 IN WITH A/N: 538811 Permit to Construct Issued: 09/28/12	C10	C9 S12		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
STACK, NO.2, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 538811 Permit to Construct Issued: 09/28/12	S12	C10			

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO.3, NATURAL GAS. GENERAL ELECTRIC, MODEL LMS100PA. SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 538804 Permit to Construct Issued 09/28/12	D13	C15	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; NOX 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX 10 73 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006], NOX: 123.46 LBS/MMSCF (1) [RULE 2012, 5-6-2005], PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978], PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2 (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT,	A63.1, A99.1, A99.2, A99.3, A99.4, A99.5, A195.1, A195.2, A195.3, A327.1, C1.1, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I298.3, I298.9, K40.1, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (104 GROSS MW)				5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO.3, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 538812 Permit to Construct Issued: 09/28/12	C15	D13 C16			
SELECTIVE CATALYTIC REDUCTION, NO. 3, HALDOR-TOPSOE DNX-629, 1272 CU.FT.; WIDTH: 19 FT 6 IN; HEIGHT: 33 FT; LENGTH: 2 FT 6 IN WITH A/N: 538812 Permit to Construct Issued: 09/28/12	C16	C15 S18		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID STACK, NO.3, HEIGHT: 90 FT; DIAMETER: 13 FT 6 IN A/N: 538804 Permit to Construct Issued: 09/28/12	S18	C16			

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO.4, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 538807 Permit to Construct Issued: 09/28/12	D19	C21	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988. RULE 2005, 5-6-2005]; NOX: 10.73 LBS/MMSCF (1A) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 123.46 LBS/MMSCF (1) [RULE 2012, 5-6-2005], PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT,	A63.1, A99.1, A99.2, A99.3, A99.4, A99.5, A195.1, A195.2, A195.3, A327.1, C1.1, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I298.4, I298.10, K40.1, K67.1

- (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (104 GROSS MW)				5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO.4. BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 538816 Permit to Construct Issued: 09/28/12	C21	D19 C22			
SELECTIVE CATALYTIC REDUCTION, NO. 4, HALDOR-TOPSOE DNX-629, 1272 CU.FT.; WIDTH: 19 FT 6 IN; HEIGHT: 33 FT ; LENGTH: 2 FT 6 IN WITH A/N: 538816 Permit to Construct Issued: 09/28/12	C22	C21 S24		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
STACK, NO.4, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 538807 Permit to Construct Issued: 09/28/12	S24	C22			

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1- INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO. 5. NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA. SIMPLE CYCLE, INTERCOOLED, 891.7 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 538808 Permit to Construct Issued: 09/28/12	D25	C27	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988, RULE 2005, 5-6-2005]; NOX: 10.73 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 123.46 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT,	A63.1, A99.1, A99.2, A99.3, A99.4, A99.5, A195.1, A195.2, A195.3, A327.1, C1.1, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I298.5, I298.11, K40.1, K67.1

- (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (104 GROSS MW)				5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO.5, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 538825 Permit to Construct Issued: 09/28/12	C27	D25 C28			
SELECTIVE CATALYTIC REDUCTION, NO. 5, HALDOR-TOPSOE DNX-629, 1272 CU.FT.; WIDTH: 19 FT 6 IN; HEIGHT: 33 FT.; LENGTH: 2 FT 6 IN WITH A/N: 538825 Permit to Construct Issued: 09/28/12	C28	C27 S30		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID					
STACK, NO.5, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 538808 Permit to Construct Issued: 09/28/12	S30	C28			
System 2: EMERGENCY FIRE PUMP					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, EMERGENCY FIRE, LEAN BURN, DIESEL FUEL, CLARKE, MODEL JU6H-UFAD58, WITH AFTERCOOLER, TURBOCHARGER, 183 BHP A/N: 450908 Permit to Construct Issued: 05/05/11	D34		NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 0.9 GRAM/BHP-HR DIESEL (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; NOX + ROG: 2.8 GRAM/BHP-HR DIESEL (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; PM10: 0.1 GRAM/BHP-HR DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]; SOX 0.004 GRAM/BHP-HR (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; SOX: 0.103 LBS/1000 GAL (1) [RULE 2011, 5-6-2005]	C1.3, D12.5, D12.6, E193.1, E193.2, I298.6, K67.2
Process 2: INORGANIC CHEMICAL STORAGE					
STORAGE TANK, FIXED ROOF, TK-1, AMMONIA, 19 PERCENT AQUEOUS AMMONIA, WITH PRV SETTING AT 25 PSIG, 16000 GALS; DIAMETER: 10 FT ; HEIGHT: 24 FT A/N 538794 Permit to Construct Issued: 09/28/12	D31				C157.1, E144.1, E193.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

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

A195.1 The 4.0 PPMV CO emission limit(s) is averaged over 60 minutes at 15% O₂, dry.

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988]

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

A195.2 The 2.5 PPMV NO_X emission limit(s) is averaged over 60 minutes at 15% O₂, dry.

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]

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

A195.3 The 2.0 PPMV VOC emission limit(s) is averaged over 60 minutes at 15% O₂, dry.

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

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

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



FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

NH_3 (ppmv) = $[a-b*c/1EE+06]*1EE+06/b$; where

a = NH_3 injection rate (lb/hr)/17 lb-lb-mol

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

c = change in measured NO_x across the SCR (ppmvd at 15% O_2)

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

The NO_x analyzer shall be installed and operated within 90 days of initial start-up.

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

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

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2012, 5-6-2005]

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

A327.1 For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[RULE 475, 10-8-1976; RULE 475, 8-7-1978]

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

C. Throughput or Operating Parameter Limits

ATTACHMENT 2

AES HUNTINGTON BEACH PERMIT

FACILITY PERMIT TO OPERATE

**AES HUNTINGTON BEACH, LLC
21730 NEWLAND ST
HUNTINGTON BEACH, CA 92646**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Wayne Nastri
Acting Executive Officer

By _____
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: AES HUNTINGTON BEACH, LLC

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 21730 NEWLAND ST
 HUNTINGTON BEACH, CA 92646

MAILING ADDRESS: 21730 NEWLAND ST
 HUNTINGTON BEACH, CA 92646

RESPONSIBLE OFFICIAL: WEIKKO WIRTA

TITLE: PLANT MANAGER

TELEPHONE NUMBER: (714) 374-1421

CONTACT PERSON: WEIKKO WIRTA

TITLE: PLANT MANAGER

TELEPHONE NUMBER: (714) 374-1421

TITLE V PERMIT ISSUED: April 29, 2016

TITLE V PERMIT EXPIRATION DATE: April 28, 2021

TITLE V	RECLAIM
YES	NOx: YES SOx: YES CYCLE: 2 ZONE: COASTAL

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GAS TURBINE, UNIT NO. 1, COMBINED CYCLE, GE MODEL 7FA.05, NATURAL GAS, 2273 MMBTU/HR AT 32 DEGREES F WITH DRY LOW NOX COMBUSTOR, GE DLN 2.6 WITH A/N:	D115	C120 C121 S123	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; CO2: 1000 LBS/GROSS MWH NATURAL GAS (8) [40CFR 60 Subpart TTTT, 10-23-2015]; NOX: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19.09 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/HR (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.71 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2	A63.6, A63.7, A99.4, A195.7, A195.8, A195.9, A327.1, B61.1, C1.7, C1.8, C1.9, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.5, E193.6, E448.1, I297.1, I298.1, K40.3, K67.5

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GENERATOR, 236.1 MW GROSS AT 32 DEGREES F GENERATOR, HEAT RECOVERY STEAM TURBINE, STEAM, COMMON WITH GAS TURBINE NO. 2, 221.4 MW GROSS AT 32 DEGREES F				PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	
CO OXIDATION CATALYST, BASF, SERVING GAS TURBINE NO. 1, WITH 328.8 CU FT OF TOTAL CATALYST VOLUME A/N:	C120	D115			D12.10, E193.4
SELECTIVE CATALYTIC REDUCTION, CORMETECH, TITANIUM/VANADIUM/TUNGSTEN, SERVING UNIT NO 1, 2761 CU FT OF TOTAL CATALYST VOLUME, WIDTH: 1 FT 6 IN; HEIGHT: 71 FT 7.2 IN; LENGTH: 25 FT 8.4 IN WITH A/N: AMMONIA INJECTION, INJECTION GRID	C121	D115		NH3: 5 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.10, D12.7, D12.8, D12.9, E193.4
STACK, SERVING TURBINE NO. 1, HEIGHT: 150 FT ; DIAMETER: 20 FT A/N:	S123	D115			

- | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> * (1) (1A) (1B) Denotes RECLAIM emission factor (3) Denotes RECLAIM concentration limit (5) (5A) (5B) Denotes command and control emission limit (7) Denotes NSR applicability limit (9) See App B for Emission Limits | <ul style="list-style-type: none"> (2) (2A) (2B) Denotes RECLAIM emission rate (4) Denotes BACT emission limit (6) Denotes air toxic control rule limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) (10) See section J for NESHAP/MACT requirements |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GAS TURBINE, UNIT NO. 2, COMBINED CYCLE, GE MODEL 7FA.05, 2273 MMBTU/HR AT 32 DEGREES F WITH DRY LOW NOX COMBUSTOR, GE DLN 2.6 WITH A/N:	D124	C129 C130 S132	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; CO2: 1000 LBS/GROSS MWH NATURAL GAS (8A) [40CFR 60 Subpart TTTT, 10-23-2015]; NOX: 2 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19.09 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/HR (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.71 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2	A63.6, A63.7, A99.4, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.7, C1.8, C1.9, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.5, E193.6, E448.1, I297.1, I298.1, K40.3, K67.5

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GENERATOR, 236.1 MW GROSS AT 32 DEGREES F GENERATOR, HEAT RECOVERY STEAM TURBINE, STEAM, COMMON WITH GAS TURBINE NO. 1, 221.4 MW GROSS AT 32 DEGREES F				PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	
CO OXIDATION CATALYST, BASF, SERVING GAS TURBINE NO. 2, WITH 328.8 CU FEET OF TOTAL CATALYST VOLUME A/N:	C129	D124			D12.10, E193.4
SELECTIVE CATALYTIC REDUCTION, CORMETECH, TITANIUM/VANADIUM/TUNGSTEN, SERVING UNIT NO. 2, 2761 CU FT OF TOTAL CATALYST VOLUME, WIDTH: 1 FT 6 IN; HEIGHT: 71 FT 7.2 IN; LENGTH: 25 FT 8.4 IN WITH A/N: AMMONIA INJECTION, INJECTION GRID	C130	D124		NH3: 5 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.10, D12.7, D12.8, D12.9, E193.4
STACK, SERVING UNIT NO. 2, HEIGHT: 150 FT ; DIAMETER: 20 FT A/N:	S132	D124			

- | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> * (1) (1A) (1B) Denotes RECLAIM emission factor (3) Denotes RECLAIM concentration limit (5) (5A) (5B) Denotes command and control emission limit (7) Denotes NSR applicability limit (9) See App B for Emission Limits | <ul style="list-style-type: none"> (2) (2A) (2B) Denotes RECLAIM emission rate (4) Denotes BACT emission limit (6) Denotes air toxic control rule limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) (10) See section J for NESHAP/MACT requirements |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GAS TURBINE, UNIT NO. 3 SIMPLE CYCLE, GE MODEL LMS100PB, NATURAL GAS, 885 MMTU/HR AT 65.8 DEGREES F, INTERCOOLED, WITH DRY LOW NOX COMBUSTOR WITH A/N:	D133	C135 C136 S138	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 25.11 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/HR (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.71 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996];	A63.8, A63.9, A99.5, A195.8, A195.11, A195.12, A327.1, B61.1, C1.10, C1.11, C1.12, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.7, E193.8, E448.2, E448.3, I297.2, I298.2, K40.3, K67.5

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GENERATOR, 100.8 MW GROSS AT 65.8 DEGREES F				RULE 1303(a)(1)-BACT, 12-6-2002]	
CO OXIDATION CATALYST, BASF CAMEL, SERVING GAS TURBINE NO. 3, WITH 165.6 CU FT OF TOTAL CATALYST VOLUME A/N:	C135	D133			D12.10, E193.4
SELECTIVE CATALYTIC REDUCTION, CORMETECH CHMT, TITANIUM/VANADIUM/TUNGSTEN, SERVING UNIT NO. 3, WITH 622 CU FT OF TOTAL CATALYST VOLUME, WIDTH: 4 FT 10.8 IN; HEIGHT: 11 FT 7.2 IN; LENGTH: 11 FT WITH A/N: AMMONIA INJECTION, INJECTION GRID	C136	D133		NH3: 5 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.10, D12.11, D12.12, D12.13, E193.4
STACK, SERVING UNIT NO. 3, HEIGHT: 80 FT ; DIAMETER: 13 FT 6 IN A/N:	S138	D133			

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GAS TURBINE, UNIT NO. 4, SIMPLE CYCLE, GE MODEL LMS100PB, NATURAL GAS, 885 MMBTU/HR AT 65.8 DEG F, INTERCOOLED, WITH DRY LOW NOX COMBUSTOR WITH A/N:	D139	C141 C142 S144	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 25.11 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-4-2015]; PM: 0.01 GRAINS/SCF (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM: 11 LBS/HR (5) [RULE 409, 8-7-1981; RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.71 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-4-2015]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996];	A63.8, A63.9, A99.5, A195.8, A195.11, A195.12, A327.1, B61.1, C1.10, C1.11, C1.12, D29.5, D29.6, D29.7, D82.3, D82.4, E193.3, E193.4, E193.7, E193.8, E448.2, E448.3, I297.2, I298.2, K40.3, K67.5

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
GENERATOR, 100.8 MW GROSS AT 65.8 DEG F				<i>RULE 1303(a)(1)-BACT, 12-6-2002]</i>	
CO OXIDATION CATALYST, BASF CAMEL, SERVING GAS TURBINE NO. 4, WITH 165.6 CU FT OF TOTAL CATALYST VOLUME, HEIGHT: 120 FT ; DIAMETER: 18 FT A/N:	C141	D139			D12.10, E193.4
SELECTIVE CATALYTIC REDUCTION, CORMETECH CMHT, TITANIUM/VANADIUM/TUNGSTE N, SERVING UNIT NO. 4, WITH 622 CU FT OF TOTAL CATALYST VOLUME, WIDTH: 4 FT 10.8 IN; HEIGHT: 11 FT 7.2 IN; LENGTH: 11 FT WITH A/N: AMMONIA INJECTION, INJECTION GRID	C142	D139		NH3: 5 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; <i>RULE 1303(a)(1)-BACT, 12-6-2002]</i>	A195.10, D12.11, D12.12, D12.13, E193.4
STACK, SERVING UNIT NO. 4, HEIGHT: 80 FT ; DIAMETER: 13 FT 6 IN A/N:	S144	D139			

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: Power Generation - Gas Turbines					
SELECTIVE CATALYTIC REDUCTION, BABCOCK AND WILCOX, VANADIUM, SERVING THE AUXILIARY BOILER, WITH 46 CU FT OF TOTAL CATALYST VOLUME WITH A/N: AMMONIA INJECTION, INJECTION GRID	C147	D145		NH3: 5 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.10, D12.14, D12.15, D12.16, E193.4
STACK, SERVING THE AUXILIARY BOILER, HEIGHT: 80 FT ; DIAMETER: 3 FT A/N:	S149	D145			
STORAGE TANK, HORIZONTAL, AQUEOUS AMMONIA, 19 PERCENT, 35000 GALS; DIAMETER: 13 FT ; LENGTH: 45 FT A/N:	D150				C157.1, E144.1, E193.4
STORAGE TANK, HORIZONTAL, NATURAL GAS, AQUEOUS AMMONIA, 19 PERCENT, 15000 GALS; DIAMETER: 6 FT ; LENGTH: 18 FT A/N:	D151				C157.1, E144.1, E193.4
OIL WATER SEPARATOR A/N:	D152				
OIL WATER SEPARATOR, HEAT RECOVERY STEAM A/N:	D153				

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

A195.9 The 1000 LBS/MW-HR CO₂ emission limit(s) is averaged over over a rolling 12 operating month basis. The limit shall only apply if the turbine supplies more than 1,519,500 MWh net electrical output to a utility distribution system over a rolling 12 operating month basis and a 3 year rolling average basis..

$$\text{NH}_3 \text{ (ppmv)} = [a-b*(c*1.2)/1E+06]*1E+06/b$$

1. where,
2. a = NH₃ injection rate (lbs/hr)/17(lb/lb-mol)
3. b = dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol)
4. c = change in measured NO_x across the SCR (ppmvd at 15% O₂)

The operator shall install and maintain a NO_x analyzer to measure the SCR inlet NO_x ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months. The NO_x analyzer shall be installed and operated within 90 days of initial start-up..

The operator shall use the above described method or another alternative method approved by the Executive Officer..

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

[40CFR 60 Subpart TTTT, 10-23-2015]

[Devices subject to this condition : D115, D124]

A195.10 The **5 PPMV NH₃ emission** limit(s) is averaged over 60 minutes at 15% O₂, dry basis. The operator shall calculate and continuously record the NH₃ slip concentration using the following:.

FACILITY PERMIT TO OPERATE AES HUNTINGTON BEACH, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

$$\text{NH}_3 \text{ (ppmv)} = [a-b*(c*1.2)/1E+06]*1E+06/b.$$

where

1. a = NH₃ injection rate (lbs/hr)/17(lb/lb-mol)
2. b = dry exhaust gas flow rate (scf/hr)/385.3 scf/lb-mol
3. c = change in measured NO_x across the SCR (ppmv at 15% O₂)

The operator shall install and maintain a NO_x analyzer to measure the SCR inlet NO_x ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months. The NO_x analyzer shall be installed and operated within 90 days of initial start-up..

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

The operator shall use the above described method or another alternative method approved by the Executive Officer.

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

[Devices subject to this condition : C121, C130, C136, C142, C147]

A195.11 The 2.5 PPMV NO_x emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry. This limit shall not apply during commissioning, turbine start ups and turbine shutdowns..

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]

[Devices subject to this condition : D133, D139]

A195.12 The 4.0 PPMV CO emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry. This limit shall not apply during commissioning, turbine start ups and turbine shutdowns..

ATTACHMENT 3

EL SEGUNDO POWER PERMIT



FACILITY PERMIT TO OPERATE

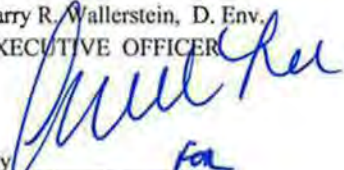
**EL SEGUNDO POWER, LLC
301 VISTA DEL MAR
EL SEGUNDO, CA 90245**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By 
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance



**FACILITY PERMIT TO OPERATE
EL SEGUNDO POWER, LLC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1:	INTERNAL COMBUSTION				
System 2:	GAS TURBINE POWER GENERATION				

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE EL SEGUNDO POWER, LLC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 219 MW					
CO OXIDATION CATALYST, UNIT NO. 5, BASF, 290 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 470653	C75	D67 C76			
SELECTIVE CATALYTIC REDUCTION, UNIT NO. 5, CORMETECH, MODEL CM21HT, WITH 2,050 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 25 FT ; HEIGHT: 70 FT ; LENGTH: 24 FT 3 IN WITH A/N:	C76	C75 S78		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.11, D12.11, D12.12, D12.13, E179.5, E179.6, E193.2
AMMONIA INJECTION, GRID					
STACK, NO. 5, HEIGHT: 210 FT ; DIAMETER: 20 FT 11 IN A/N: 470652	S78	C76			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE EL SEGUNDO POWER, LLC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 219 MW					
CO OXIDATION CATALYST, UNIT NO. 7, BASF, 290 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 470654	C79	D68 C80			
SELECTIVE CATALYTIC REDUCTION, UNIT NO. 7, CORMETECH, MODEL CM21HT, WITH 2,050 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 25 FT ; HEIGHT: 70 FT ; LENGTH: 24 FT 3 IN WITH A/N:	C80	C79 S82		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.11, D12.11, D12.12, D12.13, E179.5, E179.6, E193.2
AMMONIA INJECTION, GRID					
STACK, NO. 7, HEIGHT: 210 FT ; DIAMETER: 20 FT 11 IN A/N: 470656	S82	C80			
Process 2: EXTERNAL COMBUSTION					
System 2: BOILER, POWER GENERATION					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE EL SEGUNDO POWER, LLC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 2: EXTERNAL COMBUSTION					
BOILER, UNIT NO. 4, NATURAL GAS, COMBUSTION ENGINEERING, WITH 24 COMBUSTION ENGINEERING BURNERS, 3350 MMBTU/HR WITH A/N: 528832 STEAM TURBINE, STEAM GENERATOR, 335 MW	D13	C31	NOX: MAJOR SOURCE**	CO: 300 PPMV NATURAL GAS (5) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 7 PPMV (5B) [RULE 2009, 5-11-2001]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SO ₂ : (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]	A195.7, D28.2
SELECTIVE CATALYTIC REDUCTION, NORTH AND SOUTH DUCTS, VANADIUM/TITANIUM CATALYST BED, WITH 4058 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 28 FT 6 IN; HEIGHT: 17 FT ; LENGTH: 68 FT WITH A/N: 464316 AMMONIA INJECTION, GRID, WITH 300 NOZZLES	C31 C32	D13		NH ₃ : 20 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D28.1, E73.2, E179.1, K48.2, K67.3
Process 5: INORGANIC CHEMICAL STORAGE					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE EL SEGUNDO POWER, LLC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 5: INORGANIC CHEMICAL STORAGE					
STORAGE TANK, UNDERGROUND, TK-001, AQUEOUS AMMONIA, CARBON STEEL, DOUBLE WALLED, WITH 3 TRANSFER PUMPS AND A PRV SET AT 50 PSIG, 20000 GALS; DIAMETER: 10 FT 2 IN; LENGTH: 37 FT 10 IN A/N: 379904	D30				C157.1, E144.1
Process 6: R219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULE					
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E38			ROG: (9) [RULE 1113, 9-6-2013; RULE 1171, 2-1-2008; RULE 1171, 5-1-2009]	K67.2

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE EL SEGUNDO POWER, LLC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

[RULE 1703(a)(2) - PSD-BACT, 10-7-1988]

[Devices subject to this condition : D67, D68]

A195.9 The 2.0 PPMV NOX emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry basis.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(1)-Modeling, 5-10-1996; RULE 1303(b)(1)-Modeling, 12-6-2002; RULE 1703(a)(2) - PSD-BACT, 10-7-1988]

[Devices subject to this condition : D67, D68]

A195.10 The 2.0 PPMV VOC emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry basis.

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

[Devices subject to this condition : D67, D68]

A195.11 The 5 PPMV NH₃ emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry basis. The operator shall calculate and continuously record the NH₃ slip concentration using the following:



FACILITY PERMIT TO OPERATE EL SEGUNDO POWER, LLC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

NH_3 (ppmv) = $[a-b*c/1EE+06]*1EE+06/b$; where

a = NH_3 injection rate (lb/hr)/17 lb/lb-mol

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

c = change in measured NO_x across the SCR, (ppmv at 15 percent O_2)

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

The NO_x analyzer shall be installed and operated within 90 days of initial start-up.

The operator shall use the above described method or another alternative method approved by the Executive Officer.

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

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2012, 5-6-2005]

[Devices subject to this condition : C76, C80]

A327.1 For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[RULE 475, 10-8-1976; RULE 475, 8-7-1978]

[Devices subject to this condition : D67, D68]

ATTACHMENT 4
CPV SENTINEL PERMIT



FACILITY PERMIT TO OPERATE

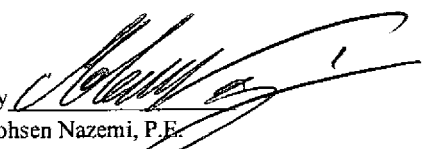
**CPV SENTINEL LLC
62575 POWER LINE RD
DESERT HOT SPRINGS, CA 92240**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By 
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance



**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: CPV SENTINEL LLC

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 62575 POWER LINE RD
DESERT HOT SPRINGS, CA 92240

MAILING ADDRESS: 55 SECOND ST STE 525
SAN FRANCISCO, CA 94105

RESPONSIBLE OFFICIAL: MARK TURNER

TITLE: PROJECT MANAGER

TELEPHONE NUMBER: (415) 293-1463

CONTACT PERSON: MARK TURNER

TITLE: PROJECT MANAGER

TELEPHONE NUMBER: (415) 293-1463

INITIAL TITLE V PERMIT ISSUED: April 15, 2011

TITLE V PERMIT EXPIRATION DATE: April 14, 2016

TITLE V	RECLAIM
----------------	----------------

YES	NOx:	YES
	SOx:	NO
	CYCLE:	1
	ZONE:	INLAND



**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
System 1: GAS TURBINES, POWER GENERATION					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements
 ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process I: INTERNAL COMBUSTION					
GAS TURBINE, CTG-1, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472139 Permit to Construct Issued: 04/15/11	D1	C3	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 4-20-2001]; NOX: 12.26 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW				-BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO. 1, BASE, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472140 Permit to Construct Issued: 04/15/11	C3	D1 C4 E54 E55			
SELECTIVE CATALYTIC REDUCTION, NO. 1, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472140 Permit to Construct Issued: 04/15/11	C4	C3 S6		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)] -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
STACK, NO. 1, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472140 Permit to Construct Issued: 04/15/11	S6	C4			

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, CTG-2, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 861.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472141 Permit to Construct Issued: 04/15/11	D7	C9	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, I296.1, K40.1, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW				-BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO. 2, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472142 Permit to Construct Issued: 04/15/11	C9	D7 C10			
SELECTIVE CATALYTIC REDUCTION, NO. 2, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472142 Permit to Construct Issued: 04/15/11	C10	C9 S12		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID STACK, NO. 2, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472142 Permit to Construct Issued: 04/15/11	S12	C10			

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, GTG 3, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472143 Permit to Construct Issued: 04/15/11	D13	C15	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 20000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 8-7-1978]; SO2: (8) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMSCF NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW					
CO OXIDATION CATALYST, NO. 3, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472145 Permit to Construct Issued: 04/15/11	C15	D13 C16			
SELECTIVE CATALYTIC REDUCTION, NO.3, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472145 Permit to Construct Issued: 04/15/11	C16	C15 S18		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID		C28			
STACK, NO. 3, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472145 Permit to Construct Issued: 04/15/11	S18	C16			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, GTG 4, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472147 Permit to Construct Issued: 04/15/11	D19	C21	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1); PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW					
CO OXIDATION CATALYST, NO. 4, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472149 Permit to Construct Issued: 04/15/11	C21	D19 C22			
SELECTIVE CATALYTIC REDUCTION, NO.4, CORMETCH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472149 Permit to Construct Issued: 04/15/11	C22	C21 S24		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID STACK, NO. 4, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472149 Permit to Construct Issued: 04/15/11	S24	C22			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, GTG 5, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472154 Permit to Construct Issued: 04/15/11	D25	C27	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPM NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5C) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 474, 12-4-1981; RULE 475, 10-8-1976]; SO2: (8) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPM NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW				-BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO.5, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472153 Permit to Construct Issued: 04/15/11	C27	D25 C28			
SELECTIVE CATALYTIC REDUCTION, NO.5, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472153 Permit to Construct Issued: 04/15/11	C28	B17 C27 S30		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID					
STACK, NO. 5, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472153 Permit to Construct Issued: 04/15/11	S30	C28			

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, GTG 6, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472154 Permit to Construct Issued: 04/15/11	D31	C33	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW					
CO OXIDATION CATALYST, NO. 6, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472155 Permit to Construct Issued: 04/15/11	C33	D31 C34			
SELECTIVE CATALYTIC REDUCTION, NO. 6, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472155 Permit to Construct Issued: 04/15/11	C34	C33 S36		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID					
STACK, NO.6, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472155 Permit to Construct Issued: 04/15/11	S36	C34			

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, GTG 7, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472156 Permit to Construct Issued: 04/15/11	D37	C39	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, E193.1, H23.1, I296.1, K40.1, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW					
CO OXIDATION CATALYST, NO. 7, BASF, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472157 Permit to Construct Issued: 04/15/11	C39	D37 C40			
SELECTIVE CATALYTIC REDUCTION, NO. 7, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472158 Permit to Construct Issued: 04/15/11 AMMONIA INJECTION, GRID	C40	C39 S42		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, GTG8, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, 891.7 MMBTU/HR AT 72 DEGREES F, WITH WATER INJECTION WITH A/N: 472158 Permit to Construct Issued: 04/15/11	D43	C45	NOX: MAJOR SOURCE**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.5 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; NOX: 12.26 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; NOX: 19 LBS/MMSCF NATURAL GAS (1A) [RULE 2012, 5-6-2005]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5B) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)]	A63.1, A63.2, A99.1, A99.3, A99.5, A99.7, A99.9, A195.1, A195.2, A195.3, A327.1, A433.1, B61.1, C1.1, C1.3, C1.6, D12.1, D29.1, D29.2, D29.3, D82.1, D82.2, H23.1, I296.1, K40.1, K67.1

- | | |
|----------------------------------------------------------|---------------------------------------------------------------|
| * (1) (1A) (1B) Denotes RECLAIM emission factor | (2) (2A) (2B) Denotes RECLAIM emission rate |
| (3) Denotes RECLAIM concentration limit | (4) Denotes BACT emission limit |
| (5) (5A) (5B) Denotes command and control emission limit | (6) Denotes air toxic control rule limit |
| (7) Denotes NSR applicability limit | (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) |
| (9) See App B for Emission Limits | (10) See section J for NESHAP/MACT requirements |

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GENERATOR, 103 MW				-BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO. 8, BASE, WITH 150 CUBIC FEET OF TOTAL CATALYST VOLUME. A/N: 472160 Permit to Construct Issued: 04/15/11	C45	D43 C46			
SELECTIVE CATALYTIC REDUCTION, NO. 8, CORMETECH CHMT-2, 812 CU.FT.; WIDTH: 2 FT 2 IN; HEIGHT: 4 FT 2 IN; LENGTH: 10 FT 11 IN WITH A/N: 472160 Permit to Construct Issued: 04/15/11	C46	C45 S48		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.2, D12.3, D12.4, E179.1, E179.2, E193.1
AMMONIA INJECTION, GRID STACK, NO.8, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 472157 Permit to Construct Issued: 04/15/11	S48	C46			
System 2: EMERGENCY ENGINES					

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
INTERNAL COMBUSTION ENGINE, EMERGENCY FIRE, DIESEL FUEL, CLARKE, MODEL JU6H-UFADTO, DRIVING AN FIRE PUMP, WITH AFTERCOOLER, TURBOCHARGER, 274 HP A/N: 472165 Permit to Construct Issued: 04/15/11	D49		NOX: PROCESS UNIT**	CO: 2.6 GRAM/BHP-HR DIESEL (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; NOX: 134 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; NOX + ROG: 3 GRAM/BHP-HR DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002; RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005]; PM10: 0.15 GRAM/BHP-HR DIESEL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]; SOX: 0.005 GRAM/BHP-HR DIESEL (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	B61.2, C1.4, C1.7, D12.5, I296.3, K67.3
Process 2: INORGANIC CHEMICAL STORAGE					
STORAGE TANK, TK-1, 29.4% AQUEOUS AMMONIA, WITH PRV SET AT 25 PSIG, 12000 GALS; DIAMETER: 9 FT 4 IN; HEIGHT: 12 FT A/N: 472161 Permit to Construct Issued: 04/15/11	D52				C157.1, E144.1, E193.1, K67.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
CPV SENTINEL LLC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 2: INORGANIC CHEMICAL STORAGE					
STORAGE TANK, TK-2, 29.4% AQUEOUS AMMONIA, WITH PRV SET AT 25 PSIG, 12000 GALS; DIAMETER: 9 FT 4 IN; HEIGHT: 12 FT A/N: 472162 Permit to Construct Issued: 04/15/11	D53				C157.1, E144.1, E193.1, K67.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements
 ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE CPV SENTINEL LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

A195.4 The 5 PPMV NH₃ emission limit(s) is averaged over 60 minutes at 15% O₂, dry basis. The operator shall calculate and continuously record the NH₃ slip concentration using the following.

$$\text{NH}_3 \text{ (ppmv)} = [a-b*c/1\text{EE}+06]*1\text{EE}+06/b; \text{ where}$$

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

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

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

The operator shall install and maintain a NO_x analyzer to measure the SCR inlet NO_x ppmv accurate to plus or minus 5 percent calibrated at least once every twelve months

The NO_x analyzer shall be installed and operated within 90 days of initial start-up

The operator shall use the above described method or another alternative method approved by the Executive Officer.

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

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

[Devices subject to this condition : C4, C10, C16, C22, C28, C34, C40, C46]

A327.1 For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[RULE 475, 10-8-1976; RULE 475, 8-7-1978]

[Devices subject to this condition : D1, D7, D13, D19, D25, D31, D37, D43]

Attachment 3
Minor Title V Permit Change Request (Resubmittal)
(September 28, 2017)

September 28, 2017

Christian Aviles
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: **Walnut Creek Energy Park - Facility ID 146536**
RECLAIM/Title V Facility Permit

Dear Mr. Aviles,

Walnut Creek Energy, LLC (WCE) submitted the attached letters to the SCAQMD requesting minor changes to conditions in the RECLAIM/Title V permit on January 19, 2016 and June 28, 2016. We requested the following changes:

- Removal of the calibration requirement for the totalizing fuel meter for the emergency fire pump engine (Section H, Permit Condition D12.6 for Device Number D34);
- Clarification that the inlet temperature requirements for the Selective Catalytic Reduction (SCR) do not apply during startup and shutdown periods (Section H, Permit Condition D12.3 for Device Numbers C4, C10, C16, C22 and C28);
- Clarification that the operating load of 100 percent for PM₁₀ emission tests also applies to PM_{2.5} emission tests (Section H, Permit Condition D29.1 for Device Numbers D1, D7, D13, D19 and D25);
- The addition of some applicable conditions from 40 CFR 60, Subpart IIII for the emergency fire pump engine (Device Number D34); and
- A change to the ammonia emission (i.e., "slip") limit from 5.0 ppmv to 5 ppmv (Section H, Permit Condition A195.4 for Device Numbers C4, C10, C16, C22 and C28)

In July 2017 we received a renewal to the RECLAIM/Title V permit dated July 6, 2017 that did not include the requested changes. In addition to the above referenced changes, we believe there are conditions in the July 6, 2017 RECLAIM/Title V permit that are missing device numbers and therefore, we are also asking for the following corrections:

- Addition of Device Number C4 to Section H, Permit Condition A195.4 (NH3 “slip” emission limit(s), calculation and monitoring requirements). Condition A195.4 currently references Device Numbers C10, C16, C22 and C28 (SCRs).
- Addition of Device Number C16 to Section H, Permit Condition D12.2 (NH3 flow meter requirements). Condition D12.2 currently references Device Numbers C4, C10, C22 and C28 (SCRs).

We intend to submit to the California Energy Commission (CEC) a copy of this request and file a minor Petition to Amend to modify Air Quality conditions AQ-4 and AQ-7. Proposed amendments to AQ-4 will correct the ammonia emission limit to 5 ppm and proposed amendments to AQ-7 will to clarify that this condition will also address PM_{2.5} source test requirements and ensure consistency of the respective conditions in the Title V and the CEC license. If you have any questions or need further information, please don't hesitate to contact me at (626) 986-0370.

Sincerely,



Rick McPherson
Plant Manager

Attachments

WCEP O&M File: 3.3.2.2

cc: Andrew Lee, SCAQMD
Dale Rundquist, CEC
CEC Dockets (05-AFC-2C)
George Piantka, NRG Energy, Inc.
Heather MacLeod, NRG Energy, Inc.