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Petition to Amend Sentinel Energy Center (07-AFC-3) Black Start Upgrade Revision 1

Submitted to: California Energy Commission Submitted by: Sentinel Energy Center, LLC

September 7, 2023

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Executive Summary

The Sentinel Energy Center, LLC (Sentinel) is a gas turbine peaking power plant located near North Palm Springs, CA. The plant consists of eight (8) General Electric LMS100 gas turbines with a combined net capacity of approximately 850 MW. The plant operates as dispatched by the California Independent System Operator (CAISO) to provide quick start electrical energy to support the Southern California Edison (SCE) electrical system.

Sentinel was certified by the California Energy Commission on December 1, 2010, Docket Number 07-AFC-03, and began commercial operation on August 1, 2013. Subsequent to its certification, the following modifications have been approved:

- Modify the Laydown Area, Notice of Determination March 17, 2011
- General Arrangement Refinements, Notice of Determination June 29, 2011
- Modify the Laydown Area, Notice of Determination August 22, 2011

Sentinel is strategically located near SCE's Devers Substation, a major substation for energy being delivered into the Los Angeles Basin. Sentinel is connected to the 220 kV bus at Southern California Edison's (SCE) Devers substation. This connection is the only electrical connection for Sentinel and is used to both export power as well as for back feed to supply station service power to plant auxiliaries when none of the eight LMS100 gas turbine units are running.

CAISO issued the "Los Angeles Basin Black Start Service" Request for Proposal in May 2021. The purpose of this Request for Proposal was to secure additional black start capability – generating units that could start by themselves with no off-site source of electricity – to provide power to aid with restoration of the bulk electric system if the system went black, i.e., no electric power.

Sentinel was one of several entities that submitted proposals to CAISO. Sentinel's proposal to upgrade the facility to allow any of the eight units to black start and keep the remainder available to start was selected by CAISO in December of 2021. Subsequently, CAISO and SCE stated that they only needed black start capability for four of the eight units at Sentinel.

To add black start capability to the facility, Sentinel is proposing the following modifications to the facility:

- Add a 17.18 MW/34.36 MWH lithium iron phosphate (LFP) battery-based black start capability to the facility.
- Supporting modifications to the plant control system and electrical distribution system.
- A modification to the South Coast Air Quality Management District (SCAQMD) air permit to support black start operation.
- A modification to the CAISO Interconnect Agreement to reflect the addition of the battery energy storage system (BESS).

The modification will allow four of the eight units to be used for black start. Normal day-to-day operations will remain unaffected.

Construction would start in spring 2024. The goal is to have the system in operation by the end of 2024.

Sentinel is located in a rural area with no sensitive receptors in close proximity. The construction work would all take place within the existing facility in a location that was previously disturbed during cut and fill operations for original construction. The air permit modification to support this change will result in no significant environmental impacts associated with this modification.

This revision to the Petition to Amend was necessitated by two changes:

- 1. The battery system vendor changed from Tesla to BYD Auto Industry Co. (BYD) due to supply chain issues. This has resulted in the BESS electrical capacity changing from 11.6 MW/23.1 MWH to 17.18 MW/34.36. The increase in size was driven by the available battery cabinet/rack sizes of the BYD system, as well as battery energy degradation considerations and system configuration update, while still meeting the same minimum power/energy and reliability requirements.
- 2. Sentinel will remain a NERC CIP Low Impact facility. This has resulted in some security modifications no longer being required.

1 Introduction

1.1 California Energy Commission Post-Certification Modification Process

This Petition to Amend the Certification of the Sentinel Energy Center is being submitted in accordance with Section 1769 of the California Code of Regulations Title 20 Public Utilities and Energy. The following table provides a list of the topics required to be addressed and the section within this Petition where they are addressed.

CEC Topical Area	Responding Section
(A) A complete description of the proposed	Section 2.2
modifications, including new language for any conditions of certification that will be affected	Section 3.0
(B) A discussion of the necessity for the proposed modifications	Section 2.4
(C) If the modification is based on information that was known by the petitioner during the certification proceeding, an explanation why the issue was not raised at that time.	Section 2.4
(D) If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, an explanation of why the change should be permitted.	Section 2.5
(E) An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts.	Section 4.1
(F) A discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards.	Section 4.2
(G) A discussion of how the modification affects the public.	Section 5
(H) A list of property owners potentially affected by the modification.	Section 6
(I) A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings.	Section 7

1.2 Overview of the Modification

The Sentinel black start upgrade will entail the following modifications to the facility:

- Addition of a 17.18 MW/34.36 MWH LFP battery. The battery system was sized to meet the design basis requirements. The BYD/SMA BESS consists of five (5) SMA Sunny Central Storage SCS 3450 UP-XT-US bidirectional power conversion systems (PCSs) with a total nameplate capacity of 17 MVA at 50°C and ten (10) BYD MC Cube 8+1 ESS outdoor batter systems, each with a nameplate capacity of 1718 kW//3436 kWh. There are five (5) BESS blocks with each block consisting of a SMA PCS connected to two (2) battery systems (eight (8) cabinets and one (1) DC Junction Box (DCJB) per string, 16 cabinets and two (2) DCJB's total). Of the five (5) BESS blocks, four (4) BESS blocks are needed to provide the required design basis power and energy for black start. The MC Cube battery modules utilize Lithium Iron Phosphate (LiFePO4) battery chemistry due to their advanced thermal design and other safety features. Attachments 9.1 and 9.2 provide further information on the SMA Sunny Central Storage and BYD MC Cube (8+1) BESS equipment.
- Modifications to the plant control system and electrical switchgear to automate load shedding on the 5 kV plant electrical distribution system when back feed from the 220 kV is lost so that the connected black start battery does not supply energy to non-black start loads. Additionally, some local manual controls will be automated to allow the plant operators to re-align and sequence loads onto the battery within the requisite time to preclude the LMS100 gas turbines going into lockout post-trip from within the control room.

In support of these physical modifications to Sentinel, the following modifications will be made to the permitting basis for the facility:

- A modification to the air permit has been requested through the South Coast Air Quality Management District to allow black start operation with higher BACT limits. The unit will comply with all Title V air permit limits, applicable SCAQMD and EPA regulations, and the SCAQMD permit to operate (PTO) once issued.
- A Material Modification to the CAISO Interconnect Agreement will be submitted that reflects the addition of the BESS. The addition of the batteries provides an additional source of fault current which is expected to be approximately 45 amps at the 220 kV level.

1.3 Ownership of the Facility Property

Sentinel Energy Center is wholly owned by Sentinel Energy Center, LLC. Sentinel Energy Center, LLC is owned by Sentinel Power Holdings, LLC (50%) and Diamond Voltage Holdings, LLC (50%).

1.4 Necessity of Proposed Changes

This modification is required for Sentinel to fulfill its new obligation to CAISO to provide black start capability.

The capability to black start Sentinel was not a requirement at the time that Sentinel was originally proposed and permitted.

1.5 Consistency of Modification with Certification

This modification does not change the primary purpose or means of operation of the Sentinel Energy Center. The modification enhances Sentinel's utility and value to the bulk electric system by also providing black start capability.

1.6 Summary of Environmental Impacts

Section 4 provides an evaluation of the environmental impacts and compliance with laws, ordinances, and regulations (LORS). Those evaluations conclude that there are no significant environmental impacts, and that Sentinel will continue to comply with applicable LORS.

2 Description of Proposed Modifications

2.1 CAISO/SCE Black Start Capability Requirements

CAISO and SCE both provided requirements that a black start resource must meet. These requirements consisted of the following items:

- Must be able to satisfy the NERC definition of Blackstart Resource.
- Must be able to supply own startup power.
- Must serve own plant load.
- Must meet fault impedance requirements of the restoration path. Generator
 protection relays should be flexible to assume temporary setting changes
 required to provide adequate protection during anticipated black start system
 configurations. This could be accommodated, but is not limited to, by utilizing
 microprocessor based protective relays with multiple group setting capability.
- Must be able to modify protective relay settings to meet system requirements during a black start event.
- Must be able to operate for 48 hours continuously.
- Must be able to energize dead transmission bus within three hours.
- Battery load calculations based on a worst-case scenario following a facility hot trip, considering a minimum of 3 start attempts.

Subsequent to the decision to add black start capacity to Sentinel, CAISO and SCE clarified that they only need four of the eight **LMS100** gas turbines to have black start capability. Additionally, the design basis evolved to require only a one-hour standby period until a unit "deemed start" whereupon a unit would start and operate to carry the plant auxiliary electric load until CAISO calls for the unit(s) to connect to and black start the CAISO transmission system.

2.2 Battery Design Basis and Sizing

Sentinel established the following design basis to meet the CAISO/SCE capability requirements: The design basis for the battery sizing was to satisfy the following requirements as described by CAISO:

- All eight LMS100 gas turbines to be placed on turning gear following the loss
 of the 220 kV from Devers. The gas turbines were assumed to either have
 been operating at load and trip on underfrequency or to have already been on
 turning gear or in standby. The gas turbines must be placed on turning gear
 within ten (10) minutes to preclude their going into a four (4) hour thermal
 lockout.
- If operating prior to the trip, the LMS100 gas turbines complete their normal one-hour high speed cooldown and thereafter remain in standby (or stay in standby if they were not operating)
- At one hour after the loss of 220 kV from Devers Substation, one of the eight LMS100 gas turbines performs a first start attempt which fails, then a second start attempt that also fails, followed by a third successful start attempt.

Currently, with back feed from the 220 kV system unavailable, Sentinel is without power except for the battery backed DC¹ lube oil systems and uninterruptible power systems for controls and instrumentation (there is also a diesel driven fire pump). Prior to this modification being implemented, if the 220 kV system that interconnects Sentinel to the SCE Devers Substation were to go black, the LMS100 gas turbines would trip offline (if running), wind down, and go into a 4-hour lockout. Until back feed power was restored, Sentinel would remain inoperable.

With the implementation of this modification, loss of the 220 kV from Devers would result in the operating LMS100 gas turbines tripping on underfrequency. Loss of the 220 kV would also trigger opening of the 52-M breaker on the 220 kV connection to Devers, opening of the breakers on the low side of the 220/4.16 kV auxiliary transformers, and opening of the feeder breakers for the 4160/480 V unit and station auxiliary transformers stripping all loads from the plant 5 kV distribution system precluding the black start battery from powering non-black start loads. The 5 kV distribution would then be reconfigured to the black start battery system. These actions are required to reduce the connected load and allow the **eight (8)** 4160/480 V unit and two (2) balance of plant (BOP) station service transformers (as well as the BESS step-up and auxiliary transformers) to remain within the SMA PCS operating limits.

With the 4160/480 V unit station service transformers for the LMS100 gas turbines and both BOP station service transformers energized, on-site energy would be available to restart the air compressors (required to provide seal air prior to the normal lube oil pumps starting), restart normal lube oil pumps, and power the hydraulic starting motors to place the gas turbines on turning gear. All three of these systems are required to preclude the gas turbines going into lockout.

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¹ DC (direct current)

Sentinel would then remain in standby until either 1) a unit(s) is called upon by CAISO to start and begin supplying the 220 kV system to Devers as part of restoration efforts for the bulk electric system, or 2) remain in standby until such time the operators start a unit within one hour to supply house load and charge the battery to maintain the facility's black start capability until called upon to begin supplying power to the 220 kV system.

The fuel gas compressors are not included as part of the load that must be powered from the BESS as Southern California Gas (SoCalGas) has provided assurance that the fuel gas supplied to Sentinel will always have a pressure of at least 325 psig. The LMS100 combustion turbines require a minimum of 250 psig at the turbine to start, and 875 psig to achieve full load. Based on experience, 325 psig is required from SoCalGas to deliver 275 psig to the gas turbines through the intervening piping and filters.

Once in operation, each LMS100 has the ability to accept a step-load increase of 8 MW at 0 MW and maintain frequency above 58.8 Hz. The step-load increase of 8 MW applies across the full load range from 0-100% power. The unit normally ramps load at 10 MW/minute. House load in a black start configuration with one unit operating on natural gas line pressure without a fuel gas compressor in operation is approximately 5.5 MW. Water injection into the LMS100 for NOx control will not commence until unit load exceeds 12 MW and fuel gas flow is greater than 10,000 pounds per hour.

To place the turbines on turning gear, power must be restored to the following loads:

- Two 4160/480 V BOP station service transformers to provide control power, power for the air compressors, and power to the 4260 V motor control centers (MCCs) for the medium voltage air compressors. All three air compressors are needed to quickly recover and provide >60 psig air pressure as a permissive for lube oil to start which in turn is required to operate the starting motor that also serves as the turning gear motor.
- Eight 4160/480 V station service transformers to power the turbine lube oil pumps, starting motors, and control power.

In sizing the battery system, the following criteria must be met:

- Provide sufficient power maximum running power is approximately 9.7 MVA/8.7 MW with seven turbines in their one-hour, post-trip cooldown and one unit performing a black start.
- Provide sufficient energy to 1) provide for the post-trip cooldown of the eight units, 2) maintain the units in standby while one unit starts, and 3) perform two failed and one successful start on one of the units. The energy requirement to satisfy this criterion is 15.38 MWH.
- Provide sufficient current to accommodate motor in-rush to start the air compressors while maintaining voltage above under-voltage trip setpoints that would cause loads to trip. A related issue of in-rush current for the station

service and BESS step-up transformers was mitigated by using a slow voltage ramp controlled by the SMA PCS inverters to avoid the high in-rush currents that would occur by simply closing the feeder breakers.

- Accommodate the power/energy losses through the transformers and lengthy cable run from the BESS location to the tie-in to the Sentinel 4260 V power distribution system.
- Accommodate a maintenance outage within the BESS. As the BESS switchgear is designed with one breaker serving each of the five (5) inverter/battery trains, if a breaker were out for maintenance or open for maintenance of the respective inverter/battery train one inverter/battery train would be unavailable. Thus, the required number of inverter/battery trains was increased from four (4) to five (5). For similar reasons, two redundant 0.5 MVA auxiliary power transformers were included in the design to allow for redundant 480 V power feeds to the BESS auxiliary power system.

2.3 Black Start Battery Addition

The BYD/SMA BESS will be located at the south end of the Sentinel facility in an area that is currently unoccupied. The area was previously disturbed during original construction and is currently surfaced with crushed rock. The BESS will be composed of the following elements:

- Ten (10) BYD MC Cube 8+1 ESS battery systems with a nameplate capacity of 1718 kW/3436 kWh, each.
- Each battery system has a DC Junction Box (DCJB) for collection of the battery cabinet DC outputs, interfacing with the SMA PCS units, and housing of the battery management system (BMS) and power distribution components.
- Five (5) SMA SCS 3450 UP-XT-US bi-directional, grid forming power conversion systems with a nameplate capacity of 4.6 MVA, each. The PCS units are derated to 3.4 MVA for operation at 50 °C. Each PCS is connected to two (2), BYD MC Cube 8+1 ESS.
- Five (5) 3.5MVA, 600/4260 V step-up, dry-type transformers. There is one transformer for each PCS.
- Two (2) 500/667 kVA, 4260/480 V step-down dry-type transformers to provide a redundant source of 480 V auxiliary power for the BESS system (primarily for the battery cabinet cooling systems).
- 4260 V outdoor BESS collection switchgear that is connected to the five (5) step-up transformers, two (2) auxiliary transformers, and one (1) zig-zag grounding transformer.
- From the BESS switchgear, a pair of 5 kV cables will route to the existing 5 kV Electrical Building. For most of the distance (approximately 600'), the cable bus will be installed in an existing electrical trench. To reach the BESS switchgear, the trench must be extended approximately 250'. The trench extension will take place within an existing plant road.
- For normal operation only, one of the two feeders will be in service (only one of the two feeder breakers at the BESS switchgear is normally closed). This

is sufficient for any charging power needs and allows the Bus A and Bus B sides of the 5 kV distribution system to remain separated. For black start operation, both feeder breakers are closed allowing the full battery capacity to discharge through the two feeders to Bus A and Bus B.

2.4 Related Electrical and Control Modifications

To support the black start modification and battery addition, the following changes to the plant control and electrical systems will also be needed:

- Modify the plant control system to interface with the SMA Power Plant Manager energy management system (EMS) to allow for communication with the battery system during black start and battery charging operating scenarios.
- Modify electrical protection and control systems to open the main 220 kV breaker on underfrequency/undervoltage on the 220 kV from Devers to island Sentinel, and to also open the feeder breakers on the plant electrical distribution system in preparation for restarting plant loads using the BESS.
- Automate control of electrical breakers for significant loads not needed for black start, such as the gas compressors² and the Zero Liquid Discharge (ZLD) system so that they open and such high load non-essential equipment does not restart without operator action when the station service transformers are energized.
- Protective relaying and controls will be added and configured to prevent the BESS from-exporting power to the grid.

2.5 SCAQMD Air Permit Modification

The SCAQMD application addresses two changes:

- An increase in BACT (ppm) limits during black start operations when a
 turbine(s) may be operating at Full Speed No Load (FSNL) or low load. In
 that operating condition, water injection that helps to reduce NOx formation
 may not be in service due to turbine load being lower than required to initiate
 water injection. Once the SCR catalyst is at temperature and ammonia
 injection is in service, turbine emissions will be reduced. Coupled with the
 low fuel flow due to low load operation, the unit will comply with all Title V air
 permit limits, applicable SCAQMD and EPA regulations, and the SCAQMD
 permit to operate (PTO) once issued.
- A modification unrelated to the black start modification that 1) adds additional startups while 2) reducing operating hours to maintain current hourly, daily, monthly, and annual mass emission limits. This change is needed to provide additional operating flexibility to meet CAISO dispatch needs.

² Southern California Gas company, which supplies natural gas to Sentinel, expects normal gas supply pressure to be available as their gas compressor stations are self-powered using natural gas as the source of energy to power the gas compressors. Gas compressors at Sentinel are required for high plant load operation; starting a unit does not require the gas compressors.

The air permit application was submitted in February 2022 and reviewed by SCAQMD. A draft permit was sent by the SCAQMD for review by the US EPA in August 2023.

2.6 CAISO Interconnection Material Modification

The addition of the black start battery system creates the potential for an additional source of fault current. This contribution is expected to be small at the 220 kV level: approximately 45 amps. Sentinel will submit a Material Modification to the CAISO for this addition.

3 Environmental Analysis of Proposed Modification

3.1 Resources

3.1.1 Greenhouse Gas Emissions

Condition C1.6 of the SCAQMD air permit and Condition of Certification AQ-6 limits annual fuel usage to 2,455 million cubic feet per year per turbine. This value is not changed by the air permit modifications for the black start operation and increased number of starts. Therefore, this modification will not increase the production of greenhouse gases at Sentinel.

3.1.2 Air Quality

This modification does not add any new combustion sources at Sentinel. As discussed in the SCAQMD Application (see Attachment 9.3), the unit will comply with all Title V air permit limits, applicable SCAQMD and EPA regulations, and the SCAQMD PTO once issued.

The air permit application requests that BACT compliance during black start operations when a turbine(s) may be operating at Full Speed No Load (FSNL), or low load be based on existing permitted hourly mass emission limit during startup. In that operating condition, water injection that helps to reduce NOx formation may not be in service due to turbine load being lower than required to initiate water injection. Once the SCR catalyst is at temperature and ammonia injection is in service, turbine emissions will be reduced.

During black start operation, up to two turbines may be operating at low load to carry house load and prevent depleting the batteries depending how long is needed before the units are asked to begin delivering energy to the grid to assist with system restoration efforts. The amount of time in a hold will be dictated by the California Independent System Operator (CAISO) as it works to reintegrate the facility with the grid.

In that configuration, with the low fuel flow due to low load operation and the SCR in service (once it reaches temperature), the unit will comply with all Title V air permit limits, applicable SCAQMD and EPA regulations, and the SCAQMD PTO once issued. While stack exit velocity will be lower due to the low load operation, the amount of fuel being burned is also much lower. Once energy starts being delivered to the grid, unit load will increase, and the units will begin operating within the previously analyzed range of operation.

3.1.2.1 Black Start Operational Emissions

Operational scenarios were developed during Sentinel's 2007 Application for Certification (AFC) that provide a basis for expected emissions during a black start event. Black Start operations are short-term in nature and are expected to be most similar to the commissioning activities analyzed in the AFC, which are summarized in Table 7.1-18 of the AFC (reproduced below). As stated in Section 7.1.2.4, Page 7.1-18, all 8 units may have operated during First Fire and Controlled Break In and no more than 1 unit may have operated during Base Load AVR.

Commissioning Activity	Duration (hr)	CTG Load (%)	Exh. Temp (°F)	Exh. Flow (acfm)	NOx (lb/hr per CTG)	CO (lb/hr per CTG)	# of CTG Modeled	NOx (lb/hr Total)	CO (lb/hr Total)
First Fire	28	0	859	163,836	11.13	45.44	8 (Assumed)	89.04	363.5
Caratrallad	20		004	220 020	20.00	20.07	,	407.4	040.0
Controlled	20	5	864	226,630	20.92	30.27	8	167.4	242.2
Break In							(Assumed)		
Dynamic AVR	40	10 -	752 -	289,675-	48.99	75.3	3	147.0	225.9
		100	868	873,543					
Base Load	16	100	767	873,543	168.06	305.63	1	168.6	305.6
AVR									

3.1.2.2 Black Start Commissioning Emissions

While the Draft PTO allows for all 8 units in operation simultaneously during Black Start Commissioning, Sentinel suggests a limitation of no more than 4 units in operation simultaneously during Black Start Commissioning. Stack characteristics during Black Start Commissioning are expected to be similar to Controlled Break In.

Black Start Event	Corresponding AFC Commissioning Activity	AFC NOx (lb/hr Total)	AFC CO (lb/hr Total)	Black Start NOx (lb/hr Total)	Black Start CO (lb/hr Total)
Commissioning	Controlled Break In	167.36	242.16	118.16 (29.54 x 4)	81.64 (20.41 x 4)

3.1.2.3 Black Start Periodic Testing Operations

The Draft PTO allows for no more than 4 units in operation simultaneously during Black Start Periodic Testing Operations. Actual operations will be dictated by CAISO; however, it is reasonable to assume that three units may be in operation at Full Speed No Load (FSNL) and one unit may be in operation at low load conditions. It is assumed that FSNL is similar to First Fire (CTG Load = 0) and low load conditions are similar to Controlled Break In.

Black Start Event	Corresponding AFC Commissioning Activity	AFC NOx (lb/hr Total)	AFC CO (lb/hr Total)	Black Start NOx (lb/hr Total)	Black Start CO (lb/hr Total)
Periodic Testing	First Fire	89.04	363.52	88.62 (29.54 x 3)	61.23 (20.41 x 3)
Operations	Controlled Break In	167.36	242.16	29.54 (29.54 x 1)	20.41 (20.41 x 1)

In addition, the original CEC Final Staff Assessment (April 2010) considered modeled air quality impacts during both startup and initial commissioning activities which includes FSNL, when up to five trains turbines would be commissioned at approximately the same time. Modeling performed in support of the FSA, the SCAQMD Permit to Construct/Permit to Operate (PTC/PTO) application, and subsequent PTC/PTO Amendment for the CPV Sentinel Energy Project, demonstrate that the proposed amendment will not cause or further contribute to a violation of any ambient air quality standard.

3.1.2.4 Construction Emissions

Required Stormwater Pollution Plan and Best Management Practices will be installed. for the project. The current site will be excavated down 6 feet. Existing asphalt road, electrical conduit, water pipe and fire protection pipe will be re-routed around the exterior of the new foundation during the excavation activities. See Figure 7.2 for a preliminary foundation layout. Excavating equipment and excavating hauling equipment will be utilized to remove the existing soil, asphalt, and other debris.

New granular backfill will be compacted below the top of the new concrete foundation and a concrete slab will be placed with knockouts for the embedded conduit for the equipment. Concrete trucks and concrete pump trucks will be utilized to place the foundation.

New in-ground cable trench will be constructed as shown on Figure 7.2. Excavating equipment and excavating hauling equipment will be utilized to place the cable trench. BESS Underground conduit will be placed in the correct lifts as the backfill is being brought up to elevation.

A mobile crane and forklift will be utilized to set the equipment (BESS containers, MV transformers, MV switchgear, inverters and transfer switch). An aboveground cable tray will be constructed from the BESS to the 5KV PDC.

Figure 7-6 shows a tentative construction schedule.

3.1.2.5 Air Quality Mitigation Measures and Conditions of Certification

The mitigation measures described within Condition of Certification AQ-SC3 "Construction Fugitive Dust Control" will be implemented for this modification.

The mitigation measures described within Condition of Certification AQ-SC6 "Off-Road Diesel Construction Equipment" will be implemented for this modification.

The mass emissions limits described within Condition of Certification AQ-1 and AQ-2 will be complied with for this modification.

Condition of Certification AQ-3 will be modified as follows (additions are **bolded**, deletions are struck out) to allow additional startups and startup time for black start operation:

The 2.5 ppm NOx emission limit, the 2.0- ppm VOC limit and the 4.0 ppm CO emission limit shall not apply during turbine commissioning, startup,—and shutdown, and black start operation and testing. The commissioning period shall not exceed 150 operating hours per turbine from the initial start-up. Following commissioning, startups shall not exceed 25 minutes and shutdowns shall not exceed 10 minutes. Written records of commissioning, startups and shutdowns shall be kept and made available to SCAQMD and submitted to the CPM for approval. Emissions of NOx shall not exceed 29.54 lbs/hr for any hour in which a startup occurs. Units 1 through 8 shall be limited to a maximum of 300 410 startups per year.

The 19 lb/mmscf NOx emission limit(s) shall only apply during interim reporting period during initial turbine commissioning and the 12.26 lbs/mmscf shall apply only during the interim reporting period after the initial turbine commissioning period, to report RECLAIM emissions. The interim period shall not exceed 12 months from the initial start-up date.

For this condition, **normal** startup shall be defined as the startup process to bring the turbine in full successful operations. If during startup the process is aborted and the startup is restarted, then the startup and restart is defined as one startup. In this case the startup time shall not exceed 1 hour.

For this condition, a black start startup shall be defined as the startup process, which may exceed one hour, to start the turbine and operate at low load with or without water injection as:

- 1. Directed by the California Independent System Operator to support restoration of the bulk electric system, or
- 2. Required at the Owner's discretion during a loss of external power supply to recharge the black start battery energy storage system to protect the ability of the facility to perform a subsequent black start using the battery energy storage system when called upon by the California Independent System Operator, or
- 3. Required for black start readiness testing in conjunction with the California Independent System Operator.

A black start startup event will terminate once the California Independent System Operator has declared that normal operations have been restored.

The project owner/operator shall complete construction and the project shall be fully operational within three years of the issuance of the permit to construction from the District.

Condition of Certification AQ-4 will be modified as follows (additions are bolded, deletions are struck out) to allow for black start operation:

Each combustion turbine stack shall have the following emission limitations.

- 2.5 PPM NOx emission averaged over 60 minutes at 15 percent oxygen, dry basis.
- 4.0 ppm CO emission averaged over 60 minutes at 15 percent oxygen, dry basis.
- 2.0 ppm VOC emission averaged over 60 minutes at 15 percent oxygen, dry basis.
- 5.0 ppm NH3 emission averaged over 60 minutes at 15 percent oxygen, dry basis

During black start operation and testing, only the limits contained within AQ-1 and AQ-6 remain in effect.

Condition of Certification AQ-5 will be modified as follows (additions are bolded, deletions are struck out) to allow for black start operation:

The project owner may at no time purposefully exceed either the mass or concentration emission limits set forth in Conditions of Certification AQ-1, 2, -3 or -4 except during black start operations as noted in AQ-3 and AQ-4.

Other air quality Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to air quality.

3.1.3 Public Health

This modification does not add any new combustion processes as its normal operation at Sentinel.

The most likely fire hazards associated with this modification include an electrical fire (Class C) and thermal runaway. Several safety features are included in the design to detect, prevent, and mitigate the hazards associated with such fires.

The installation will be protected from physical damage by the enclosure itself and additional vehicular protection (bollards) as needed and on-site traffic will be limited to a maximum speed of 10 mph.

An electrical fire may occur, which would produce heat and smoke, and would likely involve the ordinary combustibles near the source of the fire (wiring insulation, plastic components, etc.). Involvement of ordinary combustibles also classifies this type of fire as Class A. A smoke detector will be installed in each cabinet and will be connected to the fire alarm system. Upon smoke detection, a fire alarm signal will activate, and the affected BESS block will be taken offline.

Thermal runaway is a unique fire hazard associated with LFP batteries. If thermal runaway was to occur, several combustion products would be released. These include, but are not limited to, heat, smoke, flammable gases, and electrolyte vapor. To reduce the likelihood of a thermal runaway event, several safeguards are

included in the design. LFP is more stable than other lithium-ion chemistries due to its higher temperature threshold and ability to release less heat upon thermal runway.

The battery system meets the requirements of (and will be listed to) UL 1973. The battery control and monitoring system or battery management system (BMS) will actively prevent abusive charging/discharging and will shut down battery modules that show signs of malfunction. Each battery enclosure contains a chiller unit that is sized to keep the batteries below the maximum cell temperatures during charging and discharging. The BMS will shut down the battery modules if the battery cells reach the max temperature setpoint in the BMS to ensure the batteries are protected. The combination of these safeguards greatly reduces the probability of a thermal runaway event occurring.

If a thermal runaway event occurs, gas detection in addition to the smoke detection installed in each battery cabinet will detect the byproducts of thermal runaway and initiate an alarm signal through the fire alarm system and the affected BESS block will be taken offline. A UL 9540A unit-level test will be performed to show that thermal runaway will not propagate beyond the initiating module. During thermal runaway, flammable gases will be generated. A ventilation system will be installed in each battery cabinet to exhaust any explosive gases out of the enclosure, keeping the explosive gases below 25% of the lower explosive limit (LEL).

Sentinel is in a rural area and the nearest residences are a half-mile to the southwest with a prevailing wind blowing to the northwest.

Other public health Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Because this modification will not add any new combustion processes as its normal operation, the likelihood of a thermal runaway event occurring is low, and there is a substantial distance between this project and nearby residences, there is no significant adverse impact to public health.

3.1.4 Worker Safety/Fire Protection

Construction workers will receive site orientation training prior to commencing work, a portion of which addresses site safety and work practices. Being an operating facility, there will be close communication between the operating and construction staff during construction and testing. Critical tie-in work will be performed during unit/plant outages to further reduce the risk to workers and plant equipment.

The BYD/SMA BESS equipment, transformers, and switchgear will be protected from physical damage by a series of bollards as well as on-site traffic being limited to a maximum speed of 10 mph.

Site fire protection features include a fire hydrant located approximately 50 feet away from the BESS installation, a minimum of 2,300,000 gallons of raw water stored on site for firefighting purposes, and a fire alarm first responder station to be used by the fire department to safely monitor the fire alarm system during an event.

Additionally, all equipment will be spaced in accordance with applicable codes and standards to mitigate the impact of a single fire scenario.

For the design characteristics and safety features of the battery system, refer to section 4.1.3 above.

UL 9540A testing will be completed at the battery cell, module, and unit level. Considering the test report will not be available until the first quarter of 2024, Sentinel proposes a new Condition of Certification:

WORKER SAFETY-6: The project owner shall obtain test reports in compliance with UL 9540A for the cell, module, and unit or installation-level tests and indicate propagation will not occur beyond the initiating module.

Verification: At least 90 days before energization of a battery container, the project owner shall submit to the CPM the UL 9540A test reports.

A fire hydrant is located approximately 50 feet away and a minimum of 2,300,000 gallons of raw water is stored on site for firefighting purposes.

The Riverside County Fire Department (RCFD) currently provides fire protection services for Sentinel. An updated application reflecting the use of the BYD/SMA system has been submitted to RCFD.

Other worker safety Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Because this modification will not add any new combustion processes as its normal operation, the likelihood of a thermal runaway event occurring is low, and there is a substantial distance to between this project and nearby residences, there is no significant adverse impact to worker safety or fire protection.

3.1.5 Hazardous Materials Management

With the addition of LFP batteries to the Sentinel site, Appendix A "Hazardous Material" contained within the Final Commission Decision and referenced by Condition of Certification HAZ-1 will be updated as follows:

Hazardous	Primary	Estimated 30-	Estimate Storage	Storage Type
Material	Application	Day Usage	Quantity	
Lithium Iron Phosphate (LFP) Batteries	Energy Storage	416 battery cells per MC Cube (3.2 VDC cells). Eighty (80) battery MC Cubes in total, eight (8) MC Cubes per MC Cube 8+1 ESS at the initial installation	No additional battery modules are stored on site, all reside within the BYD battery cabinets	Located within the BYD battery cabinets

The Business Plan, prepared pursuant to the California Accidental Release Program (CalARP), will be updated and provided to the Riverside County Department of Environmental Health as stated within the Final Commission Decision and referenced by Condition of Certification HAZ-2.

Other hazardous material management Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to hazardous materials management.

3.1.6 Waste Management

As the battery will only be used for black start purposes, no waste batteries are expected to be produced; the batteries will normally be on standby at close to full charge. If it is necessary to replace a battery module, that would be performed by BYD, and they would handle recycling of the battery.

Other waste management Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to waste management.

3.1.7 Biological Resources

Construction workers will receive site orientation training prior to commencing work, a portion of which addresses biological resources on site.

The area where the BESS will be installed is a previously disturbed area that was subject to cut and fill operations within the facility that is surfaced with crushed rock. Planned excavations will have a maximum depth of seven (7) feet from the surface and will take place within the fill material that is over twenty (20) feet deep (see Figure 8.5 and Attachment 9.4).

There is a similar nearby space within the facility that can be used for laydown purposes.

Mitigation measures described within Condition of Certification BIO-5 "Worker Environmental Awareness Program" will be implemented for this modification.

Mitigation measures described within Condition of Certification BIO-8 "Mitigation Management to Avoid Harassment or Harm" will be implemented for this modification.

Other biological Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to biological resources.

3.1.8 Soil and Water Resources

The BESS does not consume any water, and therefore there is no significant adverse impact on water resources.

The BESS will be installed in a previously disturbed area that was subject to cut and fill operations within the facility that is surfaced with crushed rock. There is a similar nearby space within the facility that can be used for laydown purposes.

The construction of the BESS will convert a portion of the area that currently allows for percolation of stormwater into the ground into areas covered with concrete for the PCS units, battery cabinets, and transformer and switchgear foundations. Each of the five (5) transformer/PCS/battery trains are relatively small – approximately 10 12 feet by 75 feet or 900 square feet. Stormwater falling on these foundations will flow into the surrounding areas covered by crushed rock and into the soil. The PCS/battery/transformer foundations, and the switchgear foundations total approximately 9,500 square feet. The area where the BESS will be located totals approximately 15,000 square feet, which includes the 9,500 square feet of foundations and surrounding permeable surface. This does not include the adjacent 16,000 square feet of permeable surface to the west. Thus, adequate permeable surface remains around and adjacent to the new foundations for stormwater to percolate into the soil.

Other soil and water Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to soil and water resources.

3.1.9 Cultural Resources

Construction workers will receive site orientation training prior to commencing work, a portion of which addresses cultural resources on site.

The area where the BESS will be installed is a previously disturbed area that was subject to cut and fill operations within the facility and was surfaced with crushed rock. Figure 8.5 contains the grading plan for the area where the BESS will be located as well. Attachment 9.4 contains a series of aerial and ground level photographs showing the prior site disturbance where the BESS will be located. The depth of fill where the BESS is located is approximately twenty (20) feet.

There is a similar nearby space within the facility that can be used for laydown purposes. The maximum planned depth of excavation is seven (7) feet and will

take place within the fill material, which is over twenty (20) feet deep (see Figure 8.5 and Attachment 9.4). Therefore, no ground disturbance within native soils is expected and there are no significant adverse impacts to cultural resources.

The mitigation measures described within Condition of Certification CUL-5 "Worker Environmental Awareness Program" will be implemented for this modification. Other cultural Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to cultural resources.

3.1.10 Geological and Paleontological

For this modification, additional geotechnical investigations were carried out to gain a better understanding of the fill materials that were used and to finalize the foundation design. No new geotechnical hazards were or are expected to be created by this modification.

All soil disturbance will occur in prior fill material. Therefore, it is unlikely that any paleontological items would be discovered.

The mitigation measures described within Condition of Certification PAL-4 "Worker Environmental Awareness Program" will be implemented for this modification. Other paleontological Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to paleontological resources.

3 1 11 Land Use

As modified, there will be no impact to land use as all of the modifications take place within the existing Sentinel facility.

Other land use Conditions of Certification were either completed as part of the original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to land use.

3.1.12 Traffic and Transportation

During implementation of this modification, there will be a small temporary increase in traffic to Sentinel associated with delivery of the BYD/SMA system, transformers, switchgear, bulk materials, and workers. Each of the 10 BYD Magic Cube ESS 8+1 ships fully encased on one truck. The other major components and miscellaneous items are expected to result in an additional 15 truck trips. The BESS, transformer, and switchgear foundations are expected to require approximately 15 concrete truck trips.

Transportation permits/licenses will be obtained from the California Highway Patrol and/or CalTrans as required for delivery of the loads. Transport of the equipment will comply with requirements for transportation of hazardous materials (the Lithiumion batteries). All project deliveries will comply with the Conditions of Certification.

Other traffic and transportation Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to traffic and transportation.

3.1.13 Socioeconomics

The addition of the BESS and associated electrical and physical modifications will require construction workers. The construction workforce is expected to peak at approximately 40 people with an overall duration of eight months. No additional plant operators will be required.

Other socioeconomics Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Given this low level of activity, there will be no significant impacts to public services, housing, or utilities, and as a result there will be no significant adverse socioeconomic impacts.

3.1.14 Noise and Vibration

The addition of the BYD/SMA BESS will have a negligible effect on noise radiated from Sentinel. The PCS units are rated at no more than 65 dB at 10 meters (32.5 feet) and the battery cabinets at no more than 70 dB at 1 meter (3.3 feet). Therefore, there will be no significant adverse noise impacts.

The mitigation measures described within Condition of Certification NOISE-6 "Construction Time Restrictions" will be implemented for this modification.

Other noise Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to noise and vibration.

3.1.15 Visual Resources

The BYD MC Cube 8+1 ESS battery system is 9.5 feet tall and the SMA PCS units are 7.6 feet tall. There are many other items on site – tanks, stacks, SCR housings, transformers, and buildings – that are taller and far more prominent. Thus, the addition of the BESS will not have a significant adverse visual impact.

Two new light standards are being added as part of the upgrade to provide illumination for the operators. The light standards will conform with the design requirements contained within Condition of Certification VIS-2 "Temporary and Permanent Exterior Lighting." Other visual resources Conditions of Certification were either completed as part of original construction or are not applicable to this modification.

Therefore, there are no significant adverse impacts to visual resources.

3.2 LORS

As modified, Sentinel Energy Center will continue to comply with applicable laws, ordinances, and regulations (LORS).

4 Potential Effects on the Public

As modified, Sentinel Energy Center will not create any significant adverse environmental impacts for the reasons stated in Section 4.

5 List of Property Owners

The following parcels are part of the Sentinel site.

Property Owner	Parcel APN Number
CPV Sentinel ³	
c/o Accounting Manager	668140002
8403 Colesville Road	668140003
No. 915	668140020
Silver Spring, MD 20910	
D&E Land Company	
1090 N Palm Canyon	668130005
No. A	668140001
Palm Springs, CA 92262	
Wintec Property	
2045 E Tahquitz Canyon Way	668130007
Palm Springs, CA 92262	

The following parcels are adjacent to the Sentinel site.

Property Owner	Parcel APN Number
Barbara Braithwaite	
7 Yosemite Road	668140012
San Rafael CA, 94903	
Jerome Brastad	
PO Box 903	668140004
Thousand Palms, CA 92276	
Heather Brown	
10000 Tilton Mine Road	668130025
Redding, CA 96001	
Anita Comeau	668120018
PO Box 1334	668130023
Palm Springs, CA 92263	000130023
D&D Land Company	668140009
1090 N Palm Canyon	668270010
No. A	668270011
Palm Springs, CA 92262	000270011
Ion Ene	
7314 Saint Johns Court	668140013
Manassas, VA 20109	
Sean Foster	
c/o Aaron Wolf	668140033
PO Box 580959	000170000
N Palm Springs, CA 92258	

³ Land ownership for these parcels has not been updated by the County of Riverside from CPV Sentinel to the current operating name of Sentinel Energy Center, LLC. Sentinel Energy Center is currently working to correct the records.

Property Owner	Parcel APN Number
Jose Holguin	
47795 Dune Palms Road	669140006
No. 82	668140006
La Quinta, CA 92253	
Horowitz Family	
5922 Melvin Ave	668270012
Tarzana, CA 91356	
Kenneth Jacques	
c/o Stephen Brown	668130024
10000 Tilton Mine Road	000130024
Redding, CA 96001	
George Leatham	
Cabin 31 Sandy Beach	668140011
Vallejo, CA 94590	
Charles Lopez	668140017
65919 5 th Street	668140018
Desert Hot Springs, CA 92240	668140019
Michael Pins	
458 Monte Vista	668140005
Palm Desert, CA 92260	
Mae Skoubye	
3055 Millerama Avenue	668140010
W Valey City, UT 84119	
	668120013
	668130016
	668130017
	668130018
	668130019
	668130020
Southern California Edison	668130021
Attn C S Reenders Assistant Comptroller	668130022
PO Box 800	668140024
Rosemead, CA 91770	668140025
,	668140026
	668140034
	668140035
	668140036
	668140037
	668140038
	668140039
US Department of the Interior	668140027
Washington, DC 21401	668140028
	668140029

Property Owner	Parcel APN Number
Suzy Yu	
1623 Kains Ave	668140015
Berkeley, CA 94702	

6 Potential Effects on Property Owners

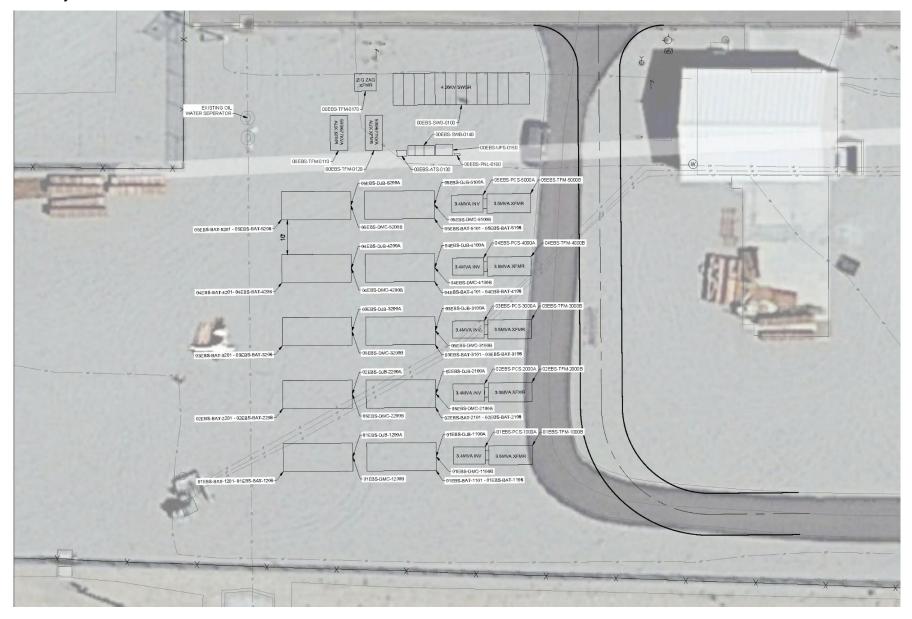
As modified, Sentinel Energy Center will not have any greater impact on adjacent property owners than current operations for the reasons stated in Section 4.

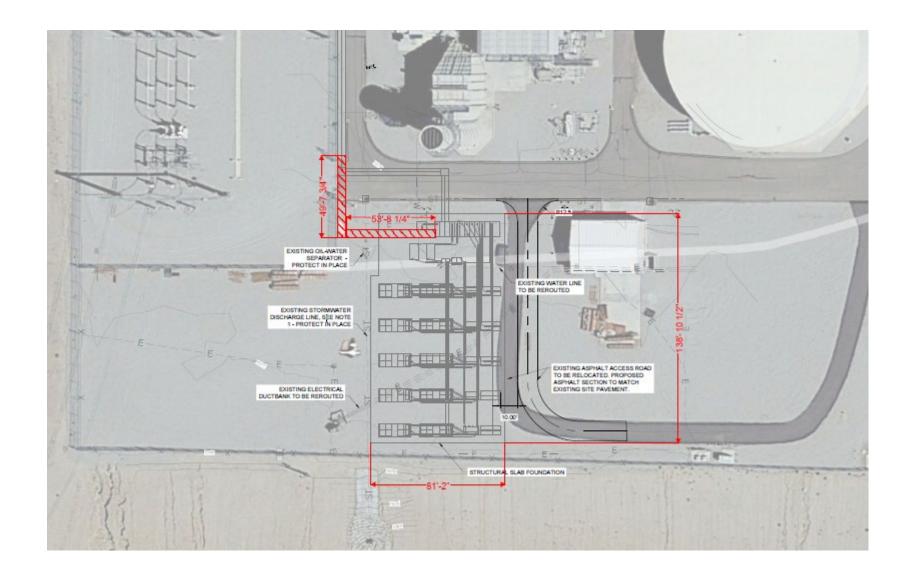
7 Figures

7.1 Sentinel Site

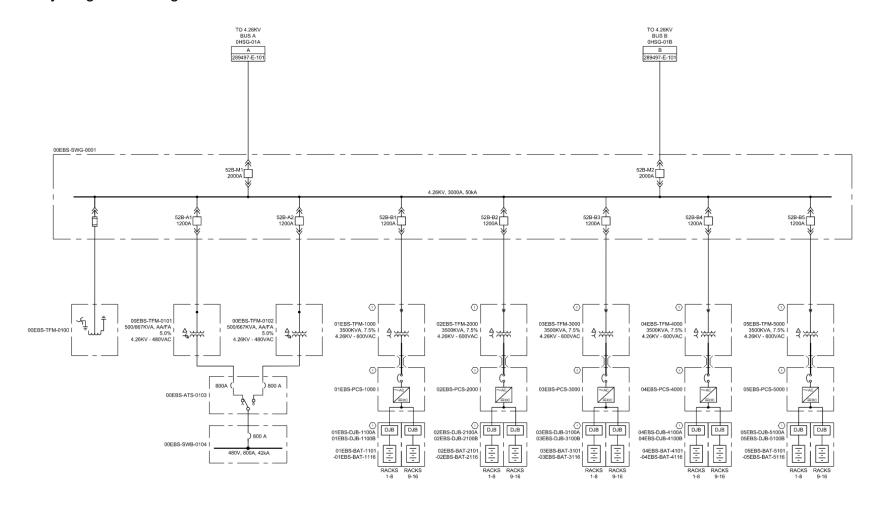


7.2 Battery Site Plan

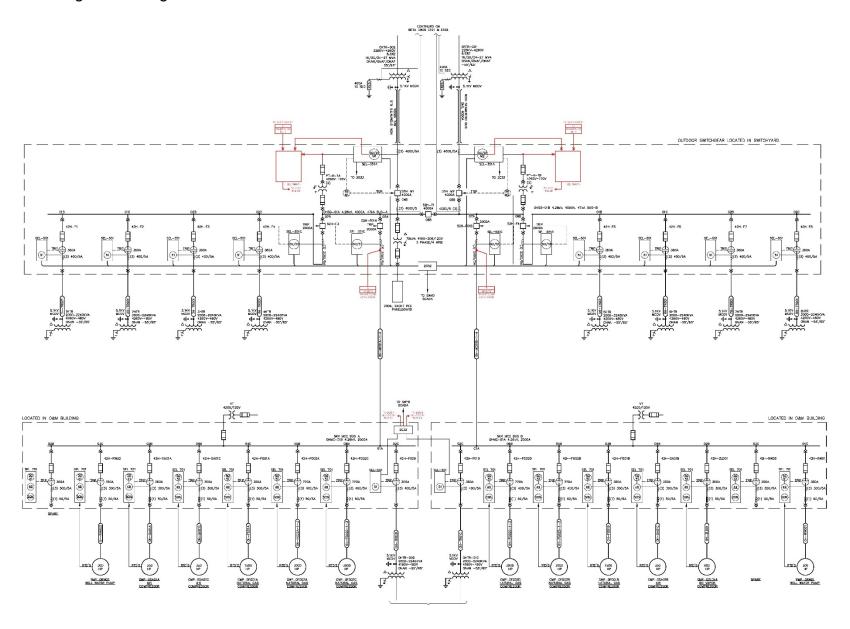




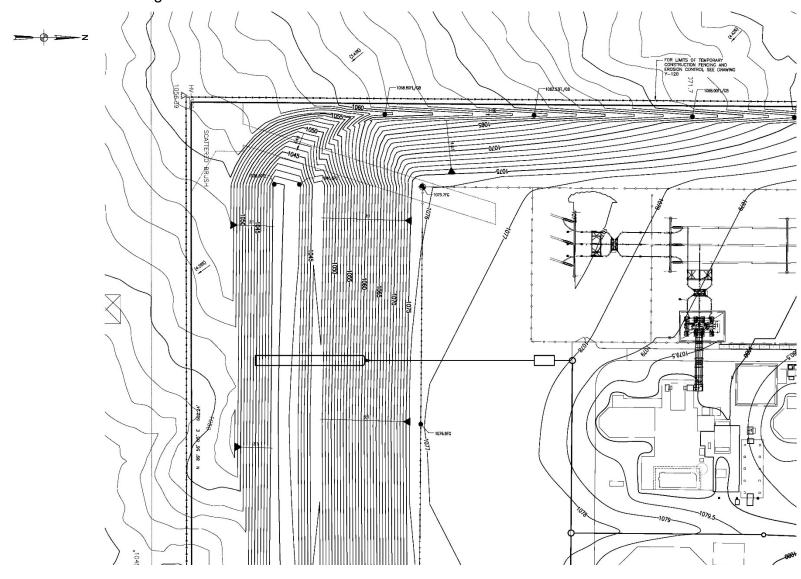
7.3 Battery Single Line Diagram



7.4 Sentinel Single Line Diagram



7.5 Sentinel Grading Plan



7.6 Sentinel Construction Schedule

Construction					
	Indergrounds (8220)				
C.1120		5	04 Amr 24	05 Amr 24	E
	Install SWPP & BMPs [8220]	15	01-Apr-24	05-Apr-24	5
C.1110	Overexcavate, Stockpile & Initial Backfill w/ Compaction [8220]		08-Apr-24	26-Apr-24	5
C.1010	Install Foundations, Curing, Grounding, & Below Grade Raceway [8220]	40	29-Apr-24	24-Jun-24	5
C.1190	Relocate Exisiting Utilities [8220]	40	29-Apr-24	24-Jun-24	5
C.1170	Final Backfill [8220]	20	11-Jun-24	09-Jul-24	5
C.1180	Road Relocation [8220]	5	10-Jul-24	16-Jul-24	10
C.1020	Site Finishing [8220]	10	10-Jul-24	23-Jul-24	5
	Construction (8410)				
C.1090	Exisiting Plant Electrical Modifications [8410]	40	01-Apr-24	24-May-24	95
C.1200	Relocate Existing Utilities [8410]	40	29-Apr-24	24-Jun-24	5
C.1130	Install BESS Interconnect Wiring [8410]	15	24-Jul-24	13-Aug-24	5
C.1030	Receive & Install 4.26kV Switchgear [8410]	5	09-Aug-24	15-Aug-24	28
C.1050	Receive & Set BESS [8410]	15	14-Aug-24	04-Sep-24	5
C.1100	Receive & Set Power Conversion System (PCS) [8410]	5	05-Sep-24	11-Sep-24	5
C.1070	Receive & Install MV Transformers [8410]	5	12-Sep-24	18-Sep-24	5
C.1140	Receive & Install Switchboards [8410]	5	12-Sep-24	18-Sep-24	5
C.1160	Receive & Install UPS [8410]	5	12-Sep-24	18-Sep-24	5
C.1060	Install Electrical (Tray/Conduit/Cable/Terminations) [8410]	20	05-Sep-24	02-Oct-24	5
Commissioning	, , , , , , , , , , , , , , , , , , , ,				
S.1030	Switchgear Energization	1	10-Oct-24	10-Oct-24	9
S.1020	Existing GE Controls Integration Commissioning [Owner]	15	03-Oct-24	23-Oct-24	10
S.1010	BESS Commissioning [BESS]	10	11-Oct-24	24-Oct-24	9
S.1000	EPC Equipment Commissioning [BMcD]	20	03-Oct-24	30-Oct-24	5
S.1040	Blackstart Testing [CAISO/PTO/BMcD/Owner/BESS]	15	31-Oct-24	20-Nov-24	5

8 Attachments

- 8.1 Tesla Megapack 2XL Data Sheet BYD Technical Specification for 8+1 BESS
- 8.2 SMA SCS 3450 UP-XT-US Data Sheet
- 8.3 SCAQMD Applications for Modification: Increase Turbine Annual Startups and Add Black Start Capability, February 2022
- 8.4 "Victorian Big Battery Fire: July 30, 2021" Fisher Engineering and Energy Safety Response Group, January 25, 2022
- 8.4 Original Construction Ground Disturbance Photographs
- 8.5 Property Owner Map

Attachment 8.1 Tesla Megapack 2XL BYD Technical Specification for 8+1 BESS





	В	Remark		
Duration	n Total cell DC usable DC voltage		TCHIAI K	
	energy @BOL	energy @SAT	range	
2 hours	3.727MWh	3.436MWh	1081.6~1497.6V	8+1

ITEM	8+1
Battery Cell Model	LFP
Cooling Method	Liquid cooling
Single Cell Rated Voltage (V)	3.2
Number of Battery Cells per Battery Unit	416
Number of Battery Unit	8
Cell Energy per BESS Unit (kWh)	3727
DC Usable Energy (kWh) @FAT	3542
DC Usable Energy(kWh)@SAT	3436

Attachment 8.2 SMA SCS 3450 UP-XT-US Data Sheet

SUNNY CENTRAL STORAGE 3450 UP-XT-US/3600 UP-XT-US/3800 UP-XT-US/ 3950 UP-XT-US EXTENDED GRID-FEED POWER





Efficient

- High power density
- Max. efficiency of 98.8%
- Lower transportation costs (up to 4 inverters in a standard shipping container)

Robust

- Proven OptiCool[™] technology for intelligent, effective cooling
- Can be installed worldwide outdoors in any ambient condition

Flexible

- Conforms to all relevant grid requirements worldwide
- Four quadrant operation for full reactive power support
- Stand-alone device or a mediumvoltage block solution

Versatile

- Integrated battery communication
- Customized monitoring and control of inverters
- Grid management functions for dynamic grid support
- Integrated voltage supply for internal consumption and external loads

SUNNY CENTRAL STORAGE 3450 UP-XT-US/3600 UP-XT-US/3800 UP-XT-US/3950 UP-XT-US EXTENDED GRID-FEED POWER

Battery inverters for large scale storage systems

With a maximum output of up to 4600 kVA and system voltages up to 1500 V DC, the SMA Sunny Central Storage (SCS) UP-XT-US allows for more efficient and flexible system design for battery power plants. These SCS power classes allow a system design with higher output power and higher short-circuit current contribution. A separate voltage supply and additional space are available for the installation of customer equipment. The intelligent cooling system OptiCool ensures smooth operation even in extreme ambient temperature.

SUNNY CENTRAL STORAGE 3450 UP-XT-US / 3600 UP-XT-US

Technical Data	SCS 3450 UP-XT-US	SCS 3600 UP-XT-US	
Battery side (DC)			
Operating DC voltage range V _{DC}	880 V to 1500 V	921 V to 1500 V	
Max. DC current I _{DC, max}	475	0 A	
Fuse characteristic for battery connection—pre-arcing integral limit single DC busbar / split busbar 12) 15)	10.75 MA ² s	/ 8.0 MA ² s	
Single DC busbar 36 connections per pole / split DC busbar 12/12/12 connections per pole / fused single DC busbar 22 connections per pole 16)	•/c	/0	
DC connection	with term	inal lug	
Grid side (AC)			
Nominal Grid-Feed AC power at 1200 Vdc and cos φ =1.0 and 25°C	4000 kW	4200 kW	
Grid-Feed mode: AC apparent power at 1200 Vdc (at 25°C / at 40°C / at 50°C) ^{3) 13) 14)}	4000 kVA / 3640 kVA / 3400 kVA	4200 kVA / 3822 kVA / 3570 kV	
Charging mode: AC apparent power at 1200 Vdc (at 25°C / at 40°C / at 50°C) ^{3] 13] 14]}	3589 kVA / 3268 kVA / 3001 kVA	3769 kVA / 3432 kVA / 3152 kV	
Max. AC current I _{AC. max} (at 25°C / at 40°C / at 50°C)	3850 A / 350	4 A / 3273 A	
Max. total harmonic distortion	< 3% at nom	ninal power	
Nominal AC voltage / nominal AC voltage range ^{1) 8)}	600 V / 480 V to 720 V	630 V / 504 V to 756 V	
AC power frequency / range	50 Hz / 47 H 60 Hz / 57 H	Hz to 63 Hz	
Min. short-circuit ratio at the AC terminals ⁹	>:		
Cos φ at rated power / displacement cos φ adjustable ^{8] 10]}	1 / 0.0 overexcited		
AC connection	with busbar system (three bus	oars, one per line conductor)	
Efficiency			
Max. efficiency ²	98.8	3%	
Protective Devices			
Input-side disconnection point	DC load br		
Output-side disconnection point	AC circuit		
DC overvoltage protection	Surge arres	**	
AC overvoltage protection (optional)	Surge arres		
Lightning protection (according to IEC 62305-1)	Lightning Prote	ction Level III	
Insulation monitoring			
Degree of protection: electronics / air duct / connection area (as per UL 50E)	UL Type 3R / Ty	/pe I / Type I	
General Data	2015 / 2210 / 1500	1100 (012 (425 : 1)	
Dimensions (W / H / D)	2815 / 2318 / 1588 mm (< 3700 kg /		
Weight Self-consumption (max. ⁴⁾ / partial load ⁵⁾ / average ⁶⁾)	< 8100 W / < 180		
Self-consumption (standby)	< 370	•	
Auxiliary power supply: integrated 8.4 kVA transformer / external	• /		
Noise emission ⁷	65.0 d		
Operating temperature range (optional) ⁸⁾	(-40°C) -25°C to 60°C /	• •	
Temperature range (standby)	-40°C to 60°C /		
Temperature range (storage)	-40°C to 70°C / -40°F to 158°F		
Max. permissible value for relative humidity (condensing / non-condensing)	95% to 100% (2 mont	h/year) / 0% to 95%	
Maximum operating altitude above MSL ⁸⁾ 1000 m / 2000 m ¹¹⁾	• /	0	
Fresh air consumption	6500	m³/h	
Features			
Grid forming / black start ready without grid forming	0/	0	
DC connection	Terminal lug on each	input (without fuse)	
AC connection	With busbar system (three bus	bars, one per line conductor)	
Communication	Ethernet, Modbus Mo	aster, Modbus Slave	
Communication with SMA string monitor (transmission medium)	Modbus TCP / Ethern		
Enclosure / roof color	RAL 9016 /		
Supply transformer for external loads	0 (2.5	•	
Certifications and approvals	UL 62109-1, UL 1741 Chapter 13 CRD 61, UL 1741 SA, IEEE 1547, UL 1998, CAN/CSA C22.2 107.1-1		
EMC standards	IEC / EN 61000-6-4, IEC / EN 6100 modified class A, FC	CC Part 15 Class A	
Quality standards and directives complied with	VDI/VDE 2862 page 2	2, DIN EN ISO 900 I	
● Standard features ○ Optional — not available			
Type designation	SCS 3450 UP-XT-US	SCS 3600 UP-XT-US	
1) At nominal AC voltage, nominal AC power decreases in the same proportion 2) Efficiency measured without internal power supply 3) AC apparent power at higher dc voltages on request 4) Self-consumption at rated operation 5) Self-consumption at < 75% Pn at 25°C	 11) Earlier temperature-dependent de-rating 12) Battery short circuit disconnection has to rapid battery string or group fuses, e.g. f constant Tau (L/R) <= 1 ms 13) The specified services can be provided or 	be done on the battery side with ultra use type aR/aBat & DC time on a long-term basis. Depending on the	
6) Self-consumption averaged out from 5% to 100% Pn at 25°C	ambient temperature and the inverter ten dependent AC power can also occur on		
 Sound pressure level at a distance of 10 m Values apply only to inverters. Permissible values for SMA MV solutions from SMA can be found in the corresponding data sheets. A short-circuit ratio of < 2 requires a special approval from SMA 	14) Depending on the ratio of reactive power may occur15) Please check the manual for further info		

SUNNY CENTRAL STORAGE 3800 UP-XT-US / 3950 UP-XT-US

Technical Data	SCS 3800 UP-XT-US	SCS 3950 UP-XT-US
Battery side (DC)		
Operating DC voltage range V _{DC}	962 V to 1500 V	1003 V to 1500 V
Max. DC current I _{DC, max}	475	50 A
Fuse characteristic for battery connection—pre-arcing integral imit single DC busbar / split busbar 12) 15)	10.75 MA ² s	s / 8.0 MA ² s
Single DC busbar 36 connections per pole / split DC busbar 12/12/12 connections per pole / used single DC busbar 22 connections per pole	•/0	0/0
DC connection	with terr	ninal lug
Grid side (AC)		
Nominal Grid-Feed AC power at 1200 Vdc and cos φ =1.0 and 25°C	4400 kW	4600 kW
Grid-Feed mode: AC apparent power at 1200 Vdc (at 25°C / at 40°C / at 50°C) ^{3) 13) 14)}	4400 kVA / 4004 kVA / 3740 kVA	4600 kVA / 4186 kVA / 3910 kV
Charging mode: AC apparent power at 1200 Vdc (at 25°C / at 40°C / at 50°C) ^{3] 13] 14]}	3949 kVA / 3596 kVA / 3302 kVA	4129 kVA / 3759 kVA / 3453 k\
Max. AC current I _{AC. max} (at 25°C / at 40°C / at 50°C)	3850 A / 350	
Max. total harmonic distortion	< 3% at nor	
Nominal AC voltage / nominal AC voltage range ^{1) 8)}	660 V / 528 V to 759 V	690 V / 552 V to 759 V
AC power frequency / range	·	Hz to 53 Hz
to point inequality / raingo	60 Hz / 57	
Min. short-circuit ratio at the AC terminals ⁹	>	
Cos φ at rated power / displacement cos φ adjustable ^{8) 10)}	1 / 0.0 overexcited	to 0.0 underexcited
AC connection	with busbar system (three bus	sbars, one per line conductor)
Efficiency	, .	
Max. efficiency ²⁾	98	.8%
Protective Devices		
nput-side disconnection point	DC load b	reak switch
Output-side disconnection point	AC circui	
DC overvoltage protection	Surge arre	
AC overvoltage protection (optional)	Surge arre	, ,
	•	
ightning protection (according to IEC 62305-1)	Lightning Prot	ection Level III
nsulation monitoring		1 / 7 1
Degree of protection: electronics / air duct / connection area (as per UL 50E)	UL Type 3R / T	ype I / Type I
General Data	0015 / 0010 / 1500	/1100/010//051
Dimensions (W / H / D)	2815 / 2318 / 1588 mm	
Weight	< 3700 kg /	
Self-consumption (max. ⁴⁾ / partial load ⁵⁾ / average ⁶⁾	< 8100 W / < 1800 W / < 2000 W	
Self-consumption (standby)	< 370 W	
Auxiliary power supply: integrated 8.4 kVA transformer / external	•/0	
Noise emission ⁷⁾	65.0 c	· ·
Operating temperature range (optional) ⁸⁾	(−40°C) −25°C to 60°C /	
Femperature range (standby)	-40°C to 60°C /	
[emperature range (storage)	-40°C to 70°C /	/ −40°F to 158°F
Max. permissible value for relative humidity (condensing / non-condensing)	95% to 100% (2 mon	th/year) / 0% to 95%
Maximum operating altitude above MSL ⁸⁾ 1000 m / 2000 m ¹¹⁾	·	/ 0
Fresh air consumption	6500	m ³ /h
Features		
Grid forming / black start ready without grid forming	0,	/ 0
OC connection	Terminal lug on eacl	
AC connection	With busbar system (three bu	sbars, one per line conductor)
Communication	Ethernet, Modbus M	aster, Modbus Slave
Communication with SMA string monitor (transmission medium)	Modbus TCP / Ether	net (FO MM, Cat-5)
Enclosure / roof color	RAL 9016 ,	/ RAL 7004
Supply transformer for external loads	o (2.5	5 kVA)
Certifications and approvals	UL 62109-1, UL 1741 Chapter 13 CRD 61, UL 1741 SA, IEEE UL 1998, CAN/CSA C22.2 107.1-1	
EMC standards	IEC / EN 61000-6-4, IEC / EN 610 modified class A, FG	CC Part 15 Class A
Quality standards and directives complied with	VDI/VDE 2862 page	2, DIN EN ISO 9001
Standard features Optional – not available		
ype designation	SCS 3800 UP-XT-US	SCS 3950 UP-XT-US
1) At nominal AC voltage, nominal AC power decreases in the same proportion 2) Efficiency measured without internal power supply 3) AC apparent power at higher dc voltages on request	 11) Earlier temperature-dependent de-rating 12) Battery short circuit disconnection has to rapid battery string or group fuses, e.g. 	be done on the battery side with ultra
4) Self-consumption at rated operation 5) Self-consumption at < 75% Pn at 25°C 6) Self-consumption averaged out from 5% to 100% Pn at 25°C 7) Sound pressure level at a distance of 10 m 8) Values apply only to inverters. Permissible values for SMA MV solutions from	constant Tau (L/R) <=1 ms 13) The specified services can be provided a mbient temperature and the inverter tedependent AC power can also occur or the properties of the properties of the provided that the provi	mperature, the maximum temperature- n short notice.

- SMA can be found in the corresponding data sheets.

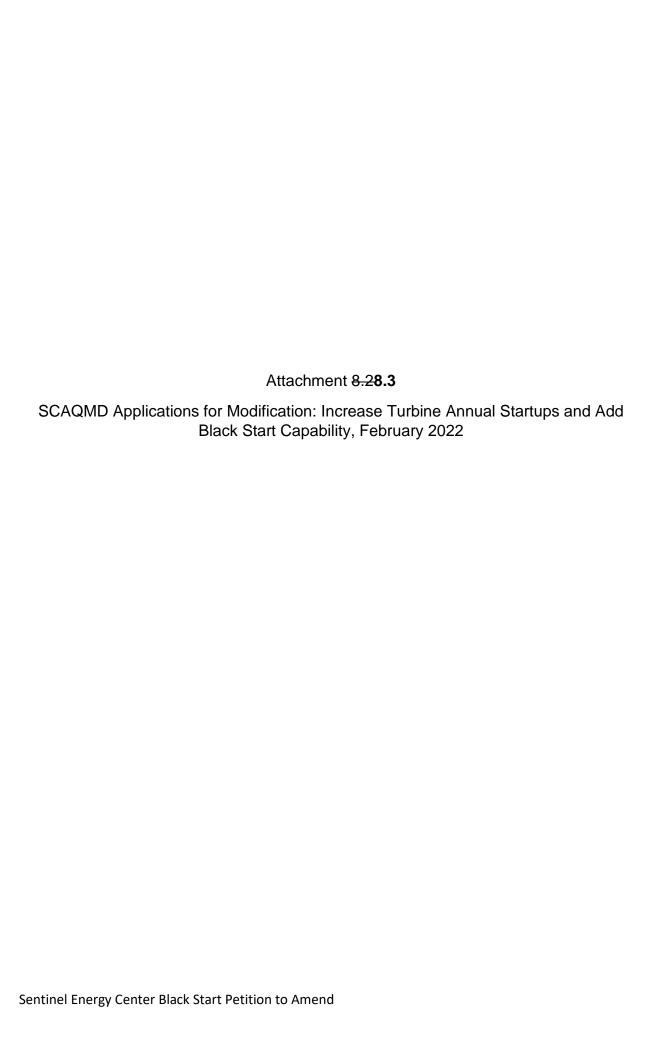
 9) A short-circuit ratio of < 2 requires a special approval from SMA
- 10) Max. power values (S/P/Q) can be requested based on project specific design
- 14) Depending on the ratio of reactive power ($\cos \phi$), an extended power derating
- 15) Please check the manual for further information
- 16) Fused DC input equipped with optional 750 A, 900 A, or 1250 A fuses

Grid-connected functions

- Setpoints for active and reactive power
- Static grid support Q(U), P(f)
- Dynamic grid support (FRT)
- Active islanding detection (AID)
- High compatibility with different battery types

Compatible with energy management system functionalities

- External static grid supporting functions
- Ramp-rate control of PV power
- Peak shaving
- Energy shifting
- Genset optimization control
- Reducing necessary spinning reserve of gensets
- Battery start-up and stop sequence
- Operates the battery within optimal operation window
- Grid forming
- Black start



Sentinel Energy Center, LLC

15775 Melissa Lane Rd North Palm Springs, CA 92258

SCAQMD Facility ID: 152707

February 2022

Prepared by:



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Applications for Modification: Increase Turbine Annual Startups and Add Black Start Capability

Prepared for:

Sentinel Energy Center, LLC 15775 Melissa Lane Road North Palm Springs, CA 92258

SCAQMD Facility ID: 152707

February 2022

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List of Acronyms and Abbreviations

A/N Application Number

BAAQMD Bay Area Air Quality Management District

BACT Best Available Control Technology

CAA Clean Air Act

Cal-ISO California Independent Systems Operator
CEMS Continuous Emissions Monitoring System
CEQA California Environmental Quality Act

CO Carbon Monoxide FSNL Full Speed No Load

HI Hazard Index

MICR Maximum Individual Cancer Risk

MM Million

MMBtu Million British Thermal Units

MW Megawatt

MWh Megawatt-Hour NO_x Nitrogen Oxides OxCat Oxidation Catalyst

PM₁₀ Particulate Matter Less Than 10 Microns in Size

RECLAIM Regional Clean Air Incentives Market

RTC RECLAIM Trading Credit

SCAQMD South Coast Air Quality Management District

SCGT Simple Cycle Gas Turbine SCR Selective Catalytic Reduction

SO_x Sulfur Oxides

TAC Toxic Air Contaminant

U.S. EPA United States Environmental Protection Agency

VOC Volatile Organic Compound

Applications for Modification: Increase Turbine Annual Startups and Add Black Start Capability

1.0 INTRODUCTION

1.1 Application Overview

On behalf of Sentinel Energy Center, LLC (Sentinel), Yorke Engineering, LLC (Yorke) is submitting this application package to request modifications to the Permits to Operate for its eight (8) natural gas-fired Simple Cycle Gas Turbines (SCGTs) [Application Numbers (A/Ns) 472139, 472141, 472143, 472147, 472150, 472154, 472156, 472158; Device ID Nos. D1, D7, D13, D19, D25, D31, D37, D43, respectively] to increase the allowable annual startups per SCGT listed in Conditions A99.3, A99.9, A99.10, and A433.1. There are no physical modifications to the SCGTs associated with this permit action.

In addition, Sentinel was awarded an 850-megawatt (MW) black start project by California Independent Systems Operator (Cal-ISO) and is proposing to install a utility-scale lithium-ion battery Tesla Megapack Island consisting of 12 Tesla Megapacks (or equivalent), each 2 MW/4 megawatt-hours (MWh), in order to provide black start capability to respond to grid-wide blackouts as determined by Cal-ISO. There are no proposed air emissions increases associated with the Tesla Megapack Island or the black start capability project.

To summarize, Sentinel requests the following:

- Modifications authorizing an increase in annual startups for the eight SCGTs from 300 startups each to 410 startups each; and
- Construction of a Megapack Island consisting of 12 Tesla Megapacks (or equivalent), each 2 MW/4 MWh, to provide black start capability.

This package contains the information necessary for the District to process and approve the applications. As a Minor Permit Revision, we request that within 45 days of this application being deemed complete, the amended Facility Permit be sent to the United States Environmental Protection Agency (U.S. EPA) for a 45-day review per Rule 3005(c)(2). Application forms and supporting documentation are provided as appendices.

Sentinel is requesting Expedited Permit Processing for this application. A Form 400-XPP is included in Appendix A and additional fees are submitted.

1.2 Facility Information

Sentinel is located in North Palm Springs, CA. Permitted equipment includes eight (8) SCGTs, each rated at 103 MW output, and a 274-horsepower diesel-fueled engine that drives a fire pump. Each SCGT is connected to SCR and OxCat. Ammonia is provided to the SCR from two (2) storage tanks containing 19% (w/w) aqueous ammonia.

Facility information is provided in Table 1-1.

Table 1-1: Facility Information

Applicant's Name:	Sentinel E	nergy Center	, LLC	
Applicant Contact Information:	Mr. David Wells EHS Coordinator Office: (760) 288-7901 E-mail: D.Wells@DGC-ops.com			
Applicant Responsible Official:	Mr. Dennis Johnson Plant Manager Office: (760) 288-7901 E-mail: D.Johnson@DGC-ops.com			
Facility ID:	152707			
RECLAIM:	NO _x : Cycle:	x 1	SO _x : Zone:	□ Inland
Title V:	Yes			
Mailing Address:	P.O. Box 1328 Desert Hot Springs, CA 92240			
Equipment Location:	15775 Melissa Lane North Palm Springs, CA 92258			

1.3 Project Background

Sentinel operates eight (8) SCGTs, each with a maximum rated generating capacity of 103 MW gross output. Each SCGT is equipped with emissions control equipment including a combination of water injection and Selective Catalytic Reduction (SCR) to reduce emissions of nitrogen oxides (NO_x), and Oxidation Catalyst (OxCat) to reduce carbon monoxide (CO) and volatile organic compound (VOC) emissions.

Sentinel is a peaker facility that operates in response to utility grid power demands requested for Cal-ISO. Grid power demand requests are increasing, and Sentinel requires the operational flexibility for additional annual startups.

In addition, Sentinel was awarded an 850 MW black start project by Cal-ISO to provide black start capability to respond to grid-wide blackouts as determined by Cal-ISO, which will require the installation of a Tesla Megapack Island consisting of 12 Tesla Megapacks, each 2 MW/4 MWh. Widespread system outage emergencies are rare, and it is expected that such emergencies will not occur more than once every 20 to 30 years.

1.4 Application Forms

This application package contains the forms necessary for District processing. The application forms are included in Appendix A and are summarized in Table 1-2.

2

Table 1-2: SCAQMD Application Forms

Form and Title	Equipment	Permit Action
400-A – Application for Permit or Plan Approval	Gas Turbine No. 1; Device ID No. D1 (A/N 472139)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 2; Device ID No. D7 (A/N 472141)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 3; Device ID No. D13 (A/N 472143)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 4; Device ID No. D19 (A/N 472147)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 5; Device ID No. D25 (A/N 472150)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 6; Device ID No. D31 (A/N 472154)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 7; Device ID No. D37 (A/N 472156)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 8; Device ID No. D43 (A/N 472158)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Black Start Megapack Island	New Construction
400-A – Application for Permit or Plan Approval	RECLAIM/ Title V Permit	RECLAIM/Title V Facility Permit Amendment
400-XPP – Express Permit Processing Request	Project	Permit Processing
400-CEQA – California Environmental Quality Act Applicability	Project	Permit Processing
500-C1 – Compliance Status Report	Project	RECLAIM/Title V Facility Permit Amendment
500-F1 (Title V) – Title IV – Acid Rain Phase II Facility Information Summary	Project	RECLAIM/Title V Facility Permit Amendment
500-A2 – Title V Application Certification	Project	RECLAIM/Title V Facility Permit Amendment

1.5 Application Preparation

This permit application was prepared by Eduardo Jimenez, with Peer Review by James Adams and Greg Wolffe of Yorke Engineering, LLC. If there are technical questions regarding this application, please use the contact information provided in Table 1-3.

Table 1-3: Application Preparers

Name:	Eduardo Jimenez CPP #E1905	James Adams CPP #M6901	Greg Wolffe CPP #D11338
Role:	Application Preparation	Application Review	Application Review
Phone:	(951) 742-7548	(949) 416-0963	(949) 248-8490
Cellular:	(949) 392-3059	(949) 573-7924	(714) 315-9049
E-mail:	EJimenez@YorkeEngr.com	JAdams@YorkeEngr.com	GWolffe@YorkeEngr.com

2.0 PROJECT DESCRIPTION

2.1 Project Description

Sentinel is proposing to increase the allowable annual startups per SCGT listed in Conditions A99.3, A99.9, A99.10, and A433.1 from 300 per year to 410 per year to provide added operational flexibility to respond to power demand requests from Cal-ISO. The increase in startups and shutdowns are expected to result in no net emissions increase in hourly, daily, monthly, annual emissions, or 30-day average since there are no proposed changes in the startup or shutdown durations and no proposed changes in the number of startups or shutdowns per day or per month. Sentinel may decrease the number of normal operating hours for there to be no net emissions increase in annual emissions due to the increase in startup/shutdown time per year and the greater hourly emissions during startup/shutdown operations.

To fulfill Cal-ISO's black start capability requirements, Sentinel will install a battery capable of starting a gas turbine if a system-wide outage occurs and there is no power available from the grid. Sentinel would operate per the instructions of Cal-ISO to restore power to the electricity grid during a system outage. Manufacturer specifications for the proposed utility-scale lithium-ion battery Megapack Island is included in Appendix B.

Operating during a black start event could require operation of a gas turbine at full speed no load (FSNL) or at minimum load for an extended period, when all the emissions controls may not be operable or achieving optimal control efficiencies, possibly resulting in emission concentrations that are in excess of the currently permitted BACT concentration limits for normal operations, but within hourly start emissions. Sentinel will continue to meet mass hourly start-up emissions limits during black start operations.

There are no physical modifications to the SCGTs associated with the annual startups increase request or the black start capability request.

2.2 Detailed List of Permit Modification Parameters

The post-project permitting will include 410 startups and shutdowns per calendar year. The permit modification proposes to increase startups and shutdowns by decreasing the potential for normal operating hours and CO emission rate during shutdown. Calculation parameters are provided in Table 2-1.

Table 2-1: Operating Parameters

Process Parameter	Pre-Project	Post-Project	Summary of Change
Starts/stops per year	300	410	Increase
Startup Duration (minutes)	25	25	
Shutdown Duration (minutes)	10	10	+
Total Hours in Startup (hr/yr)	125	171	Increase
Total Hours in Shutdown (hr/yr)	50	68	Increase
Total Hours in Operation (hr/yr)	2,803	2,440	Decrease
Total Hours in Normal Operations (hr/yr)	2,628	2,201	Decrease
Normal Operations NO _x Emission Rate (lb/hr)	7.92	7.92	
Normal Operations CO Emission Rate (lb/hr)	7.72	7.72	-
Normal Operations VOC Emission Rate (lb/hr)	2.21	2.21	
Normal Operations SO ₂ Emission Rate (lb/hr)	0.61	0.61	-
Normal Operations PM ₁₀ Emission Rate (lb/hr)	6.00	6.00	1=1
Startup NO _x Emission Rate (lb/hr)	59.76	59.76	
Startup CO Emission Rate (lb/hr)	38.15	38.15	= =
Startup VOC Emission Rate (lb/hr)	10.32	10.32	
Startup SO ₂ Emission Rate (lb/hr)	0.42	0.42	
Startup PM ₁₀ Emission Rate (Ib/hr)	6.00	6.00	-
Shutdown NO _x Emission Rate (lb/hr)	34.95	34.95	
Shutdown CO Emission Rate (lb/hr)	203.88	171.82	Decrease
Shutdown VOC Emission Rate (lb/hr)	17.48	17.48	
Shutdown SO ₂ Emission Rate (lb/hr)	0.12	0.12	
Shutdown PM ₁₀ Emission Rate (lb/hr)	6.00	6.00	_

3.0 EMISSIONS

3.1 Increase Number of Annual Startups

The proposed increase in startups per year will impact emissions of NO_x, CO, and VOC. This project proposes to increase the allowable annual startups per SCGT. A change in the startup/shutdown duration is not proposed and will remain at 25/10 minutes per event. Condition C1.1 limits total natural gas usage of a single turbine to no more than 425 million (MM) cubic feet per calendar month. Condition C1.6 limits fuel usage to no more than 2,455 MM cubic feet per year per turbine.

Monthly emissions are directly limited on a pound per month basis through a federally enforceable permit condition. Condition A63.1 limits particulate matter less than 10 microns in size (PM_{10}), CO, sulfur oxides (SO_x), and VOC emissions to 2,425 pounds, 6,477 pounds, 293 pounds, and 1,432 pounds per month, respectively. These monthly emissions assume two startups per day for 30 days per month (60 startups per month). Therefore, the requested increase in annual startups to 410 per year falls within the existing permitted limits for all monthly emission limits; continued compliance with the monthly emissions limits can be expected and no change is expected for the hourly, daily, or monthly emissions.

Annual emissions are also directly limited through Condition A63.2 for PM_{10} and SO_x on a pounds per year basis. However, because SO_x and PM_{10} are fuel-based with similar emissions during startup, shutdown, and normal operations, and the existing fuel limits (C1.1 and C1.6) will not increase, the proposed increase in startups per year is not expected to result in an increase in emissions of SO_x or PM_{10} .

The proposed project may result in an increase in annual NO_x , VOC, and CO emissions due to the increase in startup/shutdown time per year and the greater hourly emissions during startup/shutdown operations; however, annual hours of operation may be decreased in order for there to be no net emissions increase. In addition, the CO emission rate during shutdown is expected to be less than estimated during the original engineering evaluation for there to be no net emissions increase.

3.1.1 NO_x Emissions

The proposed modifications have been developed to maintain and not increase annual NO_x emissions above the existing Facility Permit I298.x conditions to hold 30,110 pounds of NO_x Regional Clean Air Incentives Market (RECLAIM) Trading Credits (RTCs) valid during each compliance year. This approach has been developed to avoid an emissions increase in accordance with Rule 2005(d) – RECLAIM New Source Review.

Sentinel proposes to increase the number of startups per year while complying with existing annual limits by reducing the overall hours of normal operation. South Coast Air Quality Management District (SCAQMD) engineering records indicate that the turbines were originally permitted based on a total of 2,803 hours per year, which included 300 startups at 25 minutes each and 300 shutdowns at 10 minutes each (175 hours total), and the balance (2,628 hours) at normal operation. To increase the annual number of startups and shutdowns to 410 (239.17 hours total), Sentinel intends to reduce total normal operations to comply with annual RTC holding requirements, which is expected to limit annual normal operations to approximately 2,201 hours (~16.2% reduction).

3.1.2 CO and VOC Emissions

Because the approach to increasing the permitted number of startups per year was developed to maintain compliance with the existing NO_x RTC holding conditions, this modification may result in changes to VOC and CO emissions.

Annual emissions of VOC and CO were calculated based on 2,201 normal hours of operation per year instead of the 2,628 hours per year as originally permitted for each turbine (see SCAQMD engineering records for A/N 472140). Due to the reduced normal annual hours of operation, the annual VOC emissions are expected to decrease. For CO, a mass emission rate of 171.82 lbs/shutdown is used. This results in a decrease in CO emissions from the current shutdown mass emissions but is well within the actual shutdown emissions.

Sentinel's permit does not currently include a mass emission limit for VOC or CO during startup hours or an annual mass emission limit (pounds per year); therefore, no change to a permit condition is proposed based on the annual start-up increase.

3.1.3 Summary of Emission Calculations

The proposed modification only affects annual emissions because direct monthly emission limits fully account for the annual increase in startups requested (originally permitted with two starts per day). The emission calculations are summarized in Table 3-1 and shown in detail in Appendix C.

Pollutant	Annual Change (lbs/year)
NO _x	No Change
CO	No Change
VOC	150

Table 3-1: Annual Emission Changes for One Turbine

3.2 Black Start Capability

The battery energy storage system will be designed to enable black start capabilities on any of the turbines to support emergency recovery of the electrical grid from a regional blackout event.

Sentinel is proposing to continue to operate in accordance with the same daily and hourly start-up emissions as was evaluated during initial permitting. The black start operations will require operation of a gas turbine at FSNL or low loads for an extended period (more than 1 hour) when emission controls may not be operable or achieving optimal control efficiencies, possibly resulting in emission concentrations for NO_x, CO, and VOC that are in excess of the currently permitted BACT concentration limits for normal operations. Sentinel is requesting that these BACT concentrations not be enforceable during black start operations.

For SO_x and PM_{10} , since emissions are fuel-based with similar emissions at different loads and the existing fuel limits (C1.1 and C1.6) will not increase, the proposed black start operations are not expected to result in an increase in emissions of SO_x or PM_{10} .

Mass emission limits are proposed only for black start operations from the gas turbines using battery power. The addition of black start capability will not affect the normal operation of the gas turbines and normal operations will remain subject to the existing BACT requirements

specified in the facility's permit conditions. As a result, there will be no increase in hourly, daily, monthly, or annual emissions from the proposed black start operations.

The proposed black start mass emission limits are shown in Table 3-2 and it includes both start-up hourly and daily emission limits that would be allowed during black start operations.

Table 3-2: Black Start BACT Emission Limits

Parameter	Proposed BACT Limit for Black Start Operations	Applies To
SU+NO Combined NO _x Emission Rate (lb/hr)	29.54	Black Start Emergency Event, Commissioning, and Routine Testing
SU+NO Combined CO Emission Rate (lb/hr)	20.40	Black Start Emergency Event, Commissioning, and Routine Testing
SU+NO Combined VOC Emission Rate (lb/hr)	5.59	Black Start Emergency Event, Commissioning, and Routine Testing
Daily NO _x Emissions Rate (lb/day)	180.25	Black Start Emergency Event and Routine Testing
Daily CO Emission Rate (lb/day)	215.55	Black Start Emergency Event and Routine Testing
Daily VOC Emission Rate (lb/day)	47.58	Black Start Emergency Event and Routine Testing
Commissioning NO _x Emissions (lb)	1,889.28	Commissioning
Commissioning CO Emission (lb)	1,305.55	Commissioning
Commissioning VOC Emission (lb)	357.71	Commissioning

Sentinel will also require a brief period of testing after installation of the battery system. This black start performance testing and adjustment activities may be required at FSNL or low loads; however, there will be no proposed increase in annual emissions from black start testing operations. Commissioning emissions will last no more than 64 hours and will not exceed the hourly BACT emission limits for black start operations. In addition, periodic testing will also be required approximately one hour every three years and those activities would also comply with the BACT emission limits for black start operations described above.

4.0 RULE COMPLIANCE EVALUATION

This section provides a review of the applicable requirements and describes how the equipment and emissions will comply with applicable standards.

4.1 Regulation II – Permits; Rule 212 – Standards for Approving Permits and Issuing Public Notice

Rule 212(c) requires public notice for:

- (c)(1). A project requesting installation of a new source or modification of an existing source if the source is location within 1,000 feet of the outer boundary of a school; or
- (c)(2). A project resulting in a new or modified facility with on-site emission increases exceeding any of the daily maximums from Rule 212(g); or
- (c)(3). A project requesting installation of a new source or modification of an existing source if the emission increases result in exposure to Maximum Individual Cancer Risk (MICR) greater than or equal to the applicable thresholds in (c)(3)(A) or substances that pose a potential risk of nuisance.

The project sources are not located within 1,000 feet of the outer boundary of a school. Therefore, Rule 212(c)(1) does not apply.

This project does not propose an increase to daily emissions. Rule 212(c)(2) does not apply.

This project does not propose an increase to annual fuel usage. There will be no corresponding increase to annual emissions of air toxics. Rule 212(c)(3) does not apply.

This project is not expected to require a Rule 212 public notice.

4.2 Regulation III – Fees; Rule 301 – Permit Fees

The application processing fees were determined using Rule 301 and are summarized in Table 4-1. The applicant is requesting expedited permit processing; additional fees are provided in accordance with Rule 301(v). A check for the total fee of \$171,882.77 is included with the application package.

¹ Defined in Section 42301.9(a) of the California Health & Safety Code as "any public or private school used for purposes of the education of more than 12 children in kindergarten or any grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in private homes."



10

Table 4-1: Application Processing Fees

Equipment	Rule 301 Table IA/IB Description	Schedule	Requested Permit Action	Fee
Gas Turbine No. 1; Device ID No. D1 (A/N 472139)	Gas Turbine, > 50 MW, other fuel	G	Alteration/Modification; Title V; RECLAIM; FY2020-21	\$23,684.83
Gas Turbine No. 2; Device ID No. D7 (A/N 472141)	Gas Turbine, > 50 MW, other fuel	G Identical Equipment Discount	Alteration/Modification; Title V; RECLAIM; FY2020-21; Identical Equipment Discount	\$11,842.42
Gas Turbine No. 3; Device ID No. D13 (A/N 472143)	Gas Turbine, > 50 MW, other fuel	G Identical Equipment Discount	Alteration/Modification; Title V; RECLAIM; FY2020-21; Identical Equipment Discount	\$11,842.42
Gas Turbine No. 4; Device ID No. D19 (A/N 472147)	Gas Turbine, > 50 MW, other fuel	G Identical Equipment Discount	Alteration/Modification; Title V; RECLAIM; FY2020-21; Identical Equipment Discount	\$11,842.42
Gas Turbine No. 5; Device ID No. D25 (A/N 472150)	Gas Turbine, > 50 MW, other fuel	G Identical Equipment Discount	Alteration/Modification; Title V; RECLAIM; FY2020-21; Identical Equipment Discount	\$11,842.42
Gas Turbine No. 6; Device ID No. D31 (A/N 472154)	Gas Turbine, > 50 MW, other fuel	G Identical Equipment Discount	Alteration/Modification; Title V; RECLAIM; FY2020-21; Identical Equipment Discount	\$11,842.42
Gas Turbine No. 7; Device ID No. D37 (A/N 472156)	Gas Turbine, > 50 MW, other fuel	G Identical Equipment Discount	Alteration/Modification; Title V; RECLAIM; FY2020-21; Identical Equipment Discount	\$11,842.42
Gas Turbine No. 8; Device ID No. D43 (A/N 472158)	Gas Turbine, > 50 MW, other fuel	G Identical Equipment Discount	Alteration/Modification; Title V; RECLAIM; FY2020-21; Identical Equipment Discount	\$11,842.42
Black Start Megapack Island	Rule 301(c)(1)(A)(iii)	С	New Construction; Title V; RECLAIM; FY2020-21	\$6,104.08
			Subtotal	\$112,685.85
		Ex	pedited Permit Processing – 301(v)	\$56,342.93
RE	ECLAIM & Title V	Facility Permi	t Amendment Fee – 301, Table VII	\$2,853.99
			Total	\$171,882.77

4.3 Regulation IV - Prohibitions

4.3.1 Rule 401 – Visible Emissions

Operation of the facility is not expected to result in visible emissions to the atmosphere. Compliance is expected.

4.3.2 Rule 402 - Nuisance

This project will result in additional operational flexibility for the SCGTs. This is not expected to result in a nuisance to the public. Compliance is expected.

4.4 Regulation XI – Source-Specific Standards; Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities

The purpose of this rule is to reduce emissions of NO_x from electric generating units at electricity generating facilities. Sentinel is subject to Rule 1135.

The November 2, 2018, version of the rule requires RECLAIM facilities to comply with the emission limits on Table 1 of the rule by January 1, 2024, or when required by a Permit to Operate issued to effectuate the emission limits, whichever occurs first.

The black start operations will take place at a period of time prior to the initiation of fuel flow but continue until prior to the generating unit generating electricity for sale over the grid for power distribution; therefore, the proposed black start operation will be within the start-up provisions of the rule and not be subject to the emissions standards. This would also apply during commissioning and reliability testing.

Sentinel's SCGTs comply with the emission limits from Table 1 of the rule during normal operations. No action is required with respect to the emission limits.

4.5 Regulation XIII - New Source Review

The purpose of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. In addition to nonattainment air contaminants, this regulation will also limit emission increases of ammonia.

Per Rule 1306(a) and (b), Regulation XIII applicability is based on increases to daily emissions or monthly emissions. The proposed modification to increase the annual number of starts will not affect the maximum daily emissions of any pollutant because the initial permitting accounted for up to two startups and shutdowns per day. Therefore, Best Available Control Technology (BACT) does not apply to this permitting action because daily maximum potential mass emissions do not increase. This project does not require a review of Regulation XIII since changes to daily and monthly emissions for the non-RECLAIM pollutants are not proposed.

In regard to the black start operations, there are two existing battery powered black start projects in the state, both in the Bay Area Air Quality Management District (BAAQMD): Russell City Energy Company, LLC and Marsh Landing Generating Station. In both projects, BACT was determined by BAAQMD to be the use of battery power for black starts and best work practices. These BACT determinations by BAAQMD focused on the operations associated with the black start capability, which included commissioning activities for the black start capability and black start emergency operations. Normal operations continued to be subject to the existing BACT requirements specified in the facility's permit conditions.

Sentinel is proposing to continue to operate in accordance with the same daily and start-up hourly emissions as was evaluated during initial permitting. Although the black start capability could require operation of a gas turbine at FSNL or low loads for an extended period when emissions controls will not be operable or achieving optimal control efficiencies, possibly resulting in emission concentrations that are in excess of the currently permitted concentration limits for normal operations, Sentinel will continue to meet hourly mass emissions limits during black start operations.

As a result, mass emission limits are proposed only for black start operations from the gas turbines using battery power. The proposed black start mass emission limits are shown in Table 3-2 above.

The addition of black start capability will not affect the normal operation of the gas turbines and normal operations will remain subject to the existing BACT requirements specified in the facility's permit conditions. Furthermore, Sentinel will use battery power for black starts and will follow best work practices.

Lastly, there will be no proposed increase in annual emissions from black start operations. As a result, there will be no increase in hourly, daily, monthly, or annual emissions from the proposed black start operations. This project does not require further review of Regulation XIII.

4.6 Regulation XIV – Toxics and Other Non-Criteria Pollutants; Rule 1401 – New Source Review for Air Toxics

This rule specifies limits for MICR, cancer burden, and non-cancer acute and chronic hazard indices (HIs) from new permit units, relocations, or modifications to existing permit units which emit Toxic Air Contaminants (TACs) listed in Table I of the rule. The rule establishes allowable risks for permit units requiring new permits pursuant to Rules 201 or 203.

This project does not propose increases to operating hours. Further evaluation of Rule 1401 is not required since the project will not result in changes to fuel usage/TAC emissions.

4.7 Regulation XVII - Prevention of Significant Deterioration

The purpose of this regulation is to establish preconstruction review requirements for stationary sources to ensure that air quality in clean air areas does not significantly deteriorate while maintaining a margin for future industrial growth.

A Major Stationary Source is a stationary source that falls under one of the listed source categories from Rule 1702(m)(1) and has the potential to emit 100 tons per year or more of any air contaminant regulated by the Clean Air Act (CAA), or a stationary source that does not fall under one of the listed source categories from Rule 1702(m)(1) and has the potential to emit 250 tons per year or more of any air contaminant regulated by the CAA. Rule 1702(m)(1) lists "fossil fuel-fired steam electric plants of more than 250 MMBtu per hour input" and "fossil fuel boilers (or combinations thereof) totaling more than 250 MMBtu per hour heat input." Sentinel operates SCGTs. SCGTs are not "steam electric plants" as there is no steam turbine and are no boilers; therefore, the potential to emit threshold for Prevention of Significant Deterioration applicability is 250 tons per year or more.

There will be no increase in hourly, daily, monthly, or annual emissions from the proposed project.

This project is not expected to require further evaluation of Regulation XVII as Sentinel is not currently a Major Stationary Source and will not become a Major Stationary Source after the Facility Permit is amended.

4.8 Regulation XX – RECLAIM

Sentinel is in the NO_x RECLAIM program. This project is not proposing any changes to the hourly or annual emissions that would impact the existing RTC Holding requirements in accordance with I298.x permit conditions. Per Appendix C, this project is not expected to result in an increase in hourly or annual NO_x emissions and will not change Sentinel's requirements under the RECLAIM program. A detailed evaluation of RECLAIM requirements is not necessary.

4.9 Regulation XXX - Title V Permits

Sentinel is in the Title V program. The SCAQMD implements the Title V program under Regulation XXX. Regulation XXX defines permit application and issuance procedures, as well as compliance requirements associated with the program.

Sentinel anticipates this application to be processed as a Minor Permit Revision. Per Rule 3005(c)(2), Sentinel requests that within 45 days of this application being deemed complete, the revised permit be sent to the U.S. EPA for a 45-day review. Table 4-2 provides demonstration that this project meets the requirements for Minor Permit Revision as stated in Rule 3000(b)(15).

4.10 California Environmental Quality Act (CEQA)

A Form 400-CEQA is provided as an attachment to this application.

5.0 PERMIT WORDING AND CONDITIONS

5.1 Proposed Permit Wording

5.2 Conditions

Sentinel suggests the following changes to the permit conditions (deletions additions).

The requested change to Conditions A99.3, A99.9, A99.10, and A433.1 reflects the updated annual start-up limit and proposed black start operations.

A99.3 The 4 PPM CO emission limit(s) shall not apply during turbine start-up, and shutdown, commission activities for black start capability, periodic testing for black start capability, or black start emergency operations periods. Start-up time shall not exceed 25 minutes for each start-up. Shutdown periods shall not exceed 10 minutes for each shutdown. The turbine shall be limited to a maximum of 300 410 start-ups per year. Written records of start-ups-and shutdowns shall be maintained and made available upon request from the Executive Officer.

For the purposes of this condition, start-up shall be defined as the start-up process to bring the turbine in full successful operations. If during start-up the process is aborted and the start-up is restarted, then the start-up and restart is defined as "one start-up". In this case the start-up time shall not exceed one hour.

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

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

A99.9 The 2.0 PPM ROG emission limit(s) shall not apply during turbine start-up, and shutdown, commission activities for black start capability, periodic testing for black start capability, or black start emergency operations periods. Start-up time shall not exceed 25 minutes for each start-up. Shutdown periods shall not exceed 10 minutes for each shutdown. The turbine shall be limited to a maximum of 300 410 start-ups per year. Written records of start-ups—and shutdowns shall be maintained and made available upon request from the Executive Officer.

For the purposes of this condition, start-up shall be defined as the start-up process to bring the turbine in full successful operations. If during start-up the process is aborted and the start-up is restarted, then the start-up and restart is defined as "one start-up". In this case the start-up time shall not exceed one hour.

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

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

A99.10 The 2.5 PPM NOx emission limit(s) shall not apply during turbine start-up, and shutdown, commission activities for black start capability, periodic testing for black start capability, or black start emergency operations periods s. Start-up time shall not exceed 25 minutes for each start-up. Shutdown periods

shall not exceed 10 minutes for each shutdown. The turbine shall be limited to a maximum of 300 410 start-ups per year. Written records of start-ups and shutdowns shall be maintained and made available upon request from the Executive Officer.

For the purposes of this condition, start-up shall be defined as the start-up process to bring the turbine in full successful operations. If during start-up the process is aborted and the start-up is restarted, then the start-up and restart is defined as "one start-up". In this case the start-up time shall not exceed one hour. The NOx emissions limited to 29.54 pounds per hour as listed in condition A433.1

The operator shall keep records of aborted turbine start-ups and make the records available to District personnel upon request.

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

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

A433.1 The operator shall comply at all times with the 2.5 ppm 1-hour BACT limit for NOx, except as defined in condition A99.1 and for the following scenario:

Operating Scenario	Maximum Hourly Emissions Limit	Operational Limit
Start-up hour	29.54	NOx emissions not to exceed 29.54 lbs total per start-up per turbine. Each turbine shall be limited to 300 410 start-ups per year, with each start-up not to exceed 25 minutes.

[RULE 1703(a)(2)-PSD-BACT, 10-7-1988; RULE 2005, 6-3-2011]

[Devices subject to this condition: Dl, D7, Dl3, D19, Df5, D31, D37, D43]

Proposed new conditions for black start operations.

A433.2 The operator shall comply with the following NOx BACT limits for black start operations:

Operating Scenario	Maximum Hourly Emissions Limit	Maximum Emissions Limit	Operational Limit
Emergency Black Start Operations	29.54	180.25 lb/day	NOx emissions not to exceed 29.54 lbs per hour and 180.25 lbs per day during emergency black start operations per turbine.
Commissioning Activities for Black Start Capability	29.54	1,889.28 Lbs/64-hour Commissioning Period	NOx emissions not to exceed 29.54 lbs per hour and 1,889.28 Lbs per 64-hour commissioning period during commissioning activities for black start operations per turbine.
Periodic Testing Activities for Black Start Capability	29.54	180.25 lb/day	NOx emissions not to exceed 29.54 lbs per hour and 180.25 lbs per day during periodic testing for black start operations per turbine.

[RULE 1703(a)(2)-PSD-BACT, 10-7-1988; RULE 2005, 6-3-2011]
[Devices subject to this condition: Dl, D7, Dl3, D19, D25, D31, D37, D43]

APPENDIX A – APPLICATION FORMS

Form and Title	Equipment	Permit Action
400-A – Application for Permit or Plan Approval	Gas Turbine No. 1; Device ID No. D1 (A/N 472139)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 2; Device ID No. D7 (A/N 472141)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 3; Device ID No. D13 (A/N 472143)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 4; Device ID No. D19 (A/N 472147)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 5; Device ID No. D25 (A/N 472150)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 6; Device ID No. D31 (A/N 472154)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 7; Device ID No. D37 (A/N 472156)	Alteration/Modification
400-A – Application for Permit or Plan Approval	Gas Turbine No. 8; Device ID No. D43 (A/N 472158)	Alteration/Modification
400-A — Application for Permit or Plan Approval	Black Start Megapack Island	New Construction
400-A — Application for Permit or Plan Approval	RECLAIM/ Title V Permit	RECLAIM/Title V Facility Permit Amendment
400-XPP – Express Permit Processing Request	Project	Permit Processing
400-CEQA – California Environmental Quality Act Applicability	Project	Permit Processing
500-C1 – Compliance Status Report	Project	RECLAIM/Title V Facility Permit Amendment
500-F1 (Title V) – Title IV – Acid Rain Phase II Facility Information Summary	Project	RECLAIM/Title V Facility Permit Amendment
500-A2 – Title V Application Certification	Project	RECLAIM/Title V Facility Permit Amendment

A printout from the SCAQMD fee calculator is also included.

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

				www.aqmu.gov
Section A - Operator Information				
1, Facility Name (Business Name of Operator to Appear on the Permit):				AQMD Facility ID (Available On it Or Invoice Issued By AQMD):
Sentinel Energy Center, LLC			reilli	t Of Invoice issued by AdMb).
3. Owner's Business Name (If different from Business Name of C	Operator):		7	152707
Section B - Equipment Location Address		Section C - Permit	Mailing Address	
4. Equipment Location Is: Fixed Location	○ Various Location	5. Permit and Corresp		
(For equipment operated at various locations, provide add	ress of initial site.)	Check here if sa	me as equipment location addres	SS
15775 Melissa Lane		P.O Box 1328		
Street Address		Address		
North Palm Springs , CA 922 Zip	58	Desert Hot Sprin	gs , CA Stat	
David Wells EHS Coon	dinator	David Wells		S Coordinator
Contact Name Title	200200	Contact Name	Title	
(760) 288-7901		(760) 288-7901		
Phone # Ext. Fax #		Phone #	Ext. Fax #	
E-Mail: D.Wells@dgc-ops.com		E-Mail: D.Wells@d	gc-ops.com	
Section D - Application Type	C In DECLAIM	O to Title V	C I- DEGLAIM S THE V D	
6. The Facility Is: Onot In RECLAIM or Title V	○ In RECLAIM	O In Title V	 In RECLAIM & Title V Pr 	ograms
7. Reason for Submitting Application (Select only ONE):	1212 7 7 7 2	- No No.		
7a. New Equipment or Process Application:	Trees of the same of the		/Previous Application or Perm	IC.
New Construction (Permit to Construct)	Administrative (Eviation of Devilous
C Equipment On-Site But Not Constructed or Operational	 Alteration/Modified 			Existing or Previous Permit/Application
C Equipment Operating Without A Permit *		fication without Prior App	roval *	u checked any of the items in
Compliance Plan	Change of Con-	ndition 7c., you MUST provide an existing		
Registration/Certification		andition without Prior Approval * Permit or Application Number:		
Streamlined Standard Permit	 Change of Loca 	472100		
7b. Facility Permits:		cation without Prior Approval *		
Title V Application or Amendment (Refer to Title V Matrix)	C Equipment Ope	rating with an Expired/Ind	active Permit *	
C RECLAIM Facility Permit Amendment	* A Higher Permit Proce	ocessing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(i))		
	Estimated End Date of C	onstruction (mm/dd/yyy	y): 8c. Estimated Start Date	of Operation (mm/dd/yyyy):
9. Description of Equipment or Reason for Compliance Plan	(list applicable rule):	10. For Identical equi	pment, how many additional	
Increase to Annual Start-ups and Add Blackstart for		applications are being submitted with this application? (Form 400-A required for each equipment / process) 7		
Are you a Small Business as per AQMD's Rule 102 definit (10 employees or less and total gross receipts are \$500,000 or less <u>OR</u> a not-for-profit training center)	ion? 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#:		
Section E - Facility Business Information				
13. What type of business is being conducted at this equipmed Power generation	ent location?	14. What is your business primary NAICS Code? (North American Industrial Classification System) 221112		
15 Are there other facilities in the SCAOMD		16. Are there any echaels (K-12) within		
jurisdiction operated by the same operator? No • Yes		1000 feet of the facility property line?		
			ation submitted with this application	
17. Signature of Responsible Official: 18. Title of Responsib		(This may cause a delay in the		the No
20. Print Name: 21. Date:		22. Do you claim confidentiality of		
	✓ Form 400-CEQA	22 Supplements		▼ Fees Enclosed
23. Check List: Authorized Signature/Date ADMD APPLICATION TRACKING # CHECK # AN	MOUNT RECEIVED	Supplementa PAYMENT TRACE	I Form(s) (ie., Form 400-E-xx)	VALIDATION
USE ONLY	- San HEVELVED	PARINE TIMO		
DATE APP DATE APP CLASS BASIC REJ III CONTROL	EQUIPMENT CATEGORY	CODE TEAM ENGINE	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

Section A - Operator Information					
1. Facility Name (Business Name of Operator to Appear on the Permit):				/alid AQMD Facility ID (Available On	
Sentinel Energy Center, LLC				Permit Or Invoice Issued By AQMD):	
3. Owner's Business Name (If different from Business Name of Operator):				152707	
Section B - Equipment Location Address		Section C - Permit Mailing Address			
		5. Permit and Correspondence Information: Check here if same as equipment location address P.O Box 1328			
Street Address		Address Desert Hot Springs CA 92240		State Zip EHS Coordinator Title	
Section D - Application Type					
	RECLAIM	○ In Title V	• In RECLAIM & Title	e V Programs	
7. Reason for Submitting Application (Select only ONE):					
7a. New Equipment or Process Application: 7c. Ed	quipment or Pr	ocess with an Existing	Previous Application or	Permit:	
Compliance Plan Change of Con		odification Existing or Previous Permit/Application odification without Prior Approval * Condition Toc., you MUST provide an exist Permit or Application Number			
7b. Facility Permits:	Change of Locat	ocation without Prior Approval *			
☐ Title V Application or Amendment (Refer to Title V Matrix)		ating with an Expired/Ina ssing Fee and additional An		ull years) may apply (Rule 301(c)(1)(D)(i)).	
8a. Estimated Start Date of Construction (mm/dd/yyyy): 8b. Estimated	End Date of Co	onstruction (mm/dd/yyy	y): 8c. Estimated Star	t Date of Operation (mm/dd/yyyy):	
 Description of Equipment or Reason for Compliance Plan (list applications) Increase to Annual Start-ups and Add Blackstart for CTG-2 		applications are be	oment, how many addition eing submitted with this ed for each equipment / pro	application?	
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 <u>OR</u> 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#:			
Section E - Facility Business Information 13. What type of business is being conducted at this equipment location	no I	44 What		.0	
Power generation	nr		ness primary NAICS Cod dustrial Classification Syste		
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?			
	nformation conta	ained herein and informa	tion submitted with this ap	plication are true and correct.	
N I	of Responsible nt Manager		19. I wish to review the (This may cause a de application process.)		
20. Print Name: Dennis Johnson 21. Date:		122	22. Do you claim confid data? (If Yes, see in		
23. Check List: X Authorized Signature/Date X Form	400-CEQA	Supplemental	Form(s) (ie., Form 400-E	-xx) X Fees Enclosed	
AQMD USE ONLY APPLICATION TRACKING # CHECK # AMOUNT REC	CEIVED	PAYMENT TRACK	KING#	VALIDATION	
DATE APP DATE APP CLASS BASIC EQUIPME	NT CATEGORY	CODE TEAM ENGINEE	REASON/ACTION TAKE	N	

South Coast

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

Section A - Operator Information					
1. Facility Name (Business Name of Operator to Appear on the Per	rmit):			AQMD Facility ID (Available On	
Sentinel Energy Center, LLC				it Or Invoice Issued By AQMD):	
3. Owner's Business Name (If different from Business Name of Op	perator):			152707	
Section B - Equipment Location Address		Section C - Permit	Mailing Address		
	Various Location	5. Permit and Corresp			
(For equipment operated at various locations, provide address of initial site.)			ame as equipment location addre	SS	
15775 Melissa Lane		P.O Box 1328			
Street Address		Address			
North Palm Springs , CA 92258 Zip		Desert Hot Springs ,		A 92240 te Zip	
David Wells EHS Coord	linator			S Coordinator	
Contact Name Title		Contact Name	Title		
(760) 288-7901		(760) 288-7901			
Phone # Ext. Fax #		Phone #	Ext. Fax	#	
E-Mail: D.Wells@dgc-ops.com		E-Mail: D.Wells@d	gc-ops.com		
Section D - Application Type					
6. The Facility Is: O Not In RECLAIM or Title V	○ In RECLAIM	O In Title V	In RECLAIM & Title V P	rograms	
7. Reason for Submitting Application (Select only ONE):					
7a. New Equipment or Process Application:	7c. Equipment or F	rocess with an Existing	g/Previous Application or Perm	it:	
New Construction (Permit to Construct)	○ Administrative	Change			
C Equipment On-Site But Not Constructed or Operational	 Alteration/Modi 			Existing or Previous	
C Equipment Operating Without A Permit *		fication without Prior App	roval *	Permit/Application	
Compliance Plan	Change of Con	If you checked any of the items in			
Registration/Certification					
Streamlined Standard Permit	Change of Loca	[1] (2.1) (2.1) [2.1] (2.1) [2.1] (2.1) [2.1] (2.1) [2.1] (2.1) [2.1] (2.1) [2.1] (2.1) [2.1] (2.1)			
		cation 472143 cation without Prior Approval*			
7b. Facility Permits:		perating with an Expired/Inactive Permit *			
Title V Application or Amendment (Refer to Title V Matrix)		cessing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(i)).			
RECLAIM Facility Permit Amendment				The state of the s	
8a. Estimated Start Date of Construction (mm/dd/yyyy): 8b. E	stimated End Date of 0	Construction (mm/dd/yyy	y): 8c. Estimated Start Date	e of Operation (mm/dd/yyyy):	
9. Description of Equipment or Reason for Compliance Plan (list applicable rule):		pment, how many additional		
Increase to Annual Start-ups and Add Blackstart fo	r CTG-3		peing submitted with this appli red for each equipment / process		
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 <u>OR</u> a not-for-profit training center)	on? No C Yes	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					
What type of business is being conducted at this equipment Power generation	nt location?	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?			
	that all information con		ation submitted with this applicati	on are true and correct.	
17. Signature of Responsible Official:	18, Title of Responsib		19. I wish to review the permi	t prior to issuance	
Sur	Plant Manage		(This may cause a delay in application process.)		
20. Print Name: Dennis Johnson	21. Date: 2/4	122	22. Do you claim confidentia data? (If Yes, see instruct		
23. Check List: X Authorized Signature/Date	▼ Form 400-CEQA			▼ Fees Enclosed	
	OUNT RECEIVED	PAYMENT TRAC		VALIDATION	
DATE APP DATE APP CLASS BASIC	EQUIPMENT CATEGORY	CODE TEAM ENGINE	ER 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

Section A - Operator Information					
1. Facility Name (Business Name of Operator to Appear on the Permit):				Valid AQMD Facility ID (Available On	
Sentinel Energy Center, LLC				Permit Or Invoice Issued By AQMD):	
3. Owner's Business Name (If different from Business Name of Op	152707				
Section B - Equipment Location Address		Section C - Permit	Mailing Address		
Street Address		Address Desert Hot Springs City David Wells Contact Name (760) 288-7901 Phone # Ext. E-Mail: D.Wells@dgc-ops.com		, CA 92240 State Zip EHS Coordinator Title Fax#	
Section D - Application Type					
6. The Facility Is: O Not In RECLAIM or Title V	O In RECLAIM	O In Title V	 In RECLAIM & Tit 	le V Programs	
7. Reason for Submitting Application (Select only ONE):					
7a. New Equipment or Process Application:	7c. Equipment or F	rocess with an Existing	g/Previous Application of	r Permit:	
New Construction (Permit to Construct)					
C Equipment On-Site But Not Constructed or Operational	Alteration/Modif			Existing or Previous	
C Equipment Operating Without A Permit *		fication without Prior App	roval*	Permit/Application	
Compliance Plan	Change of Con-	If you checked any of the items in			
Registration/Certification		notion 7c., you MUST provide an existing ndition without Prior Approval * Permit or Application Number:			
Streamlined Standard Permit	C Change of Loca				
		ocation 472147			
7b. Facility Permits:	그 이번 사람이 생각하다 시간 맛없다	rating with an Expired/In			
Title V Application or Amendment (Refer to Title V Matrix)					
RECLAIM Facility Permit Amendment				full years) may apply (Rule 301(c)(1)(D)(i)).	
8a. Estimated Start Date of Construction (mm/dd/yyyy): 8b. E	stimated End Date of C	construction (mm/dd/yy)	yy): 8c. Estimated Sta	rt Date of Operation (mm/dd/yyyy):	
Description of Equipment or Reason for Compliance Plan (Increase to Annual Start-ups and Add Blackstart for		10. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process) 7			
	on? 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#:			
Section E - Facility Business Information					
 What type of business is being conducted at this equipment Power generation 	nt location?	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?			
				oplication are true and correct.	
17. Signature of Responsible Official: 18. Title of Responsible Plant Manage			19.1 wish to review the (This may cause a de application process.		
20. Print Name 21. Date: 21. U 12		2	22. Do you claim confi data? (If Yes, see it		
23. Check List: Authorized Signature/Date		l Form(s) (ie., Form 400-l	E-xx)		
AQMD APPLICATION TRACKING # CHECK # AMOUSE ONLY \$	DUNT RECEIVED	PAYMENT TRAC	KING#	VALIDATION	
	EQUIPMENT CATEGORY	CODE TEAM ENGINE	ER REASON/ACTION TAKE	EN	



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

Section A - Operator Information					
1. Facility Name (Business Name of Operator to Appear on the Permit):				id AQMD Facility ID (Available On	
Sentinel Energy Center, LLC			Pe	ermit Or Invoice Issued By AQMD):	
3. Owner's Business Name (If different from Business Name of Opi			152707		
Section B - Equipment Location Address		Section C - Permit	Mailing Address		
		5. Permit and Correspondence Information: Check here if same as equipment location address P.O Box 1328			
Street Address North Palm Springs CA 92258 Zip		Address Desert Hot Springs City David Wells Contact Name (760) 288-7901 Phone # Ext. E-Mail: D.Wells@dgc-ops.com		CA 92240 State Zip EHS Coordinator tle	
Section D - Application Type					
6. The Facility Is: O Not In RECLAIM or Title V	C In RECLAIM	○ In Title V	In RECLAIM & Title \	/ Programs	
7. Reason for Submitting Application (Select only ONE):					
7a. New Equipment or Process Application:	7c. Equipment or F	rocess with an Existing	/Previous Application or Po	ermit:	
Compliance Plan Change of Cor		ification ification without Prior Approval * adition adition without Prior Approval *		Existing or Previous Permit/Application If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number: 472150	
7b. Facility Permits:	Change of Loca	ocation without Prior Approval *			
Title V Application or Amendment (Refer to Title V Matrix) RECLAIM Facility Permit Amendment	* A Higher Permit Proc		nual 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. Es	timated End Date of C	construction (mm/dd/yyy	y): 8c. Estimated Start I	Date of Operation (mm/dd/yyyy):	
Description of Equipment or Reason for Compliance Plan (I Increase to Annual Start-ups and Add Blackstart for	The state of the s	applications are b	pment, how many additiona eing submitted with this ap red for each equipment / proc	plication?	
	n? No C Yes	Comply (NC) be	Violation (NOV) or a Notice en issued for this equipmer If Yes, provide NOV/NO	t? No Yes	
Section E - Facility Business Information 13. What type of business is being conducted at this equipmen	t loastion?	laa waxaa			
Power generation	t location?		ness primary NAICS Code? dustrial Classification System		
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 I hereby certify	that all information con	tained herein and informa	ation submitted with this appli	cation are true and correct.	
17. Signature of Responsible Official:	18, Title of Responsib Plant Manage		19, I wish to review the pe (This may cause a delay application process.)		
20. Print Name: Dennis Johnson 21. Date:		22	22, Do you claim confider data? (If Yes, see inst		
23. Check List: X Authorized Signature/Date	Form 400-CEQA		Form(s) (ie., Form 400-E-x	x)	
AQMD USE ONLY APPLICATION TRACKING # CHECK# AMC	UNT RECEIVED	PAYMENT TRACI	KING#	VALIDATION	
DATE APP DATE APP CLASS BASIC REJ I III CONTROL	EQUIPMENT CATEGORY	CODE TEAM ENGINE	ER REASON/ACTION TAKEN		

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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

Section A - Operator Information					
1, Facility Name (Business Name of Operator to Appear on the Permit):				lid AQMD Facility ID (Available On	
Sentinel Energy Center, LLC			P	ermit Or Invoice Issued By AQMD):	
3. Owner's Business Name (If different from Business Name of O			152707		
Section B - Equipment Location Address	Section C - Permit	Mailing Address			
		Permit and Correspondence Information: Check here if same as equipment location address			
Street Address North Palm Springs CA 92258 Zip		P.O Box 1328 Address Desert Hot Springs City David Wells Contact Name (760) 288-7901 Phone # Ext. E-Mail; D.Wells@dgc-ops.com		CA 92240 State Zip EHS Coordinator itle	
Section D - Application Type					
6. The Facility Is: O Not In RECLAIM or Title V	☐ In RECLAIM	O 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 F	Process with an Existing	/Previous Application or P	ermit:	
 New Construction (Permit to Construct) ☐ Equipment On-Site But Not Constructed or Operational ☐ Equipment Operating Without A Permit * ☐ Compliance Plan ☐ Administrative ☐ Alteration/Modi ☐ Change of Construction 		dification dification without Prior Approval * indition dification without Prior Approval * indition from the item of the			
7b. Facility Permits:	Change of Loca	cation without Prior Approval *			
Title V Application or Amendment (Refer to Title V Matrix) RECLAIM Facility Permit Amendment		erating with an Expired/Indeessing Fee and additional Ar		years) may apply (Rule 301(c)(1)(D)(i)).	
8a. Estimated Start Date of Construction (mm/dd/yyyy): 8b. E	Estimated End Date of (Construction (mm/dd/yyy	yy): 8c. Estimated Start I	Date of Operation (mm/dd/yyyy):	
Description of Equipment or Reason for Compliance Plan Increase to Annual Start-ups and Add Blackstart for		applications are b	pment, how many additiona eing submitted with this ap red for each equipment / proc	pplication?	
	on? No C Yes	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		T			
13. What type of business is being conducted at this equipme	ent location?	What is your business primary NAICS Code? (North American Industrial Classification System) 221112			
Power generation 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?			
	fy that all information con		ation submitted with this appli	cation are true and correct	
17. Signature of Responsible Official:	18. Title of Responsib	le Official:	19. I wish to review the pe (This may cause a delay application process.)	ermit prior to issuance.	
20. Print Name: Dennis Johnson	21. Date: 14	22. Do you claim confidentiality of			
23. Check List: X Authorized Signature/Date	Form 400-CEQA	Supplementa	l Form(s) (ie., Form 400-E-x	x) X Fees Enclosed	
	OUNT RECEIVED	PAYMENT TRAC	V. 707 - 107 - 117 - 117 - 117	VALIDATION	
DATE APP DATE APP CLASS BASIC	EQUIPMENT CATEGORY	CODE TEAM ENGINE	ER REASON/ACTION TAKEN		

South Coast

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

Section A - Operator Information				
1. Facility Name (Business Name of Operator to Appear on the Perm	nit):		.2	2. Valid AQMD Facility ID (Available On
Sentinel Energy Center, LLC				Permit Or Invoice Issued By AQMD):
3. Owner's Business Name (If different from Business Name of Ope	rator):			152707
Section B - Equipment Location Address		Section C - Permit	Mailing Address	
4. Equipment Location Is: Fixed Location (For equipment operated at various locations, provide address 15775 Melissa Lane 4. Equipment Location Is: Fixed Location (Table 1) Fixed Location (Table 2) Fixed Location (Table	Various Location s of initial site.)	5. Permit and Corresp Check here if sa P.O Box 1328	All Control of the Assessment Control	on address
Street Address North Palm Springs , CA Zip 92258 Zip David Wells EHS Coordin Title Contact Name Title Title (760) 288-7901 Ext. Fax # E-Mail: D.Wells@dgc-ops.com Fax #		Address Desert Hot Spring City David Wells Contact Name (760) 288-7901 Phone # E-Mail: D.Wells@d	Ext.	, CA 92240 State Zip EHS Coordinator Title Fax#
		E-IVIAII. D.VVEII3@G	gc-ops.com	
Section D - Application Type	C 1 5501111	O L mil II	O 1 550 1110 5	
6. The Facility Is: Ont In RECLAIM or Title V	○ In RECLAIM	O In Title V	In RECLAIM & T	itle V Programs
7. Reason for Submitting Application (Select only ONE):	-2			TETOW
7a. New Equipment or Process Application:	7c. Equipment or P	rocess with an Existing	/Previous Application	or Permit:
New Construction (Permit to Construct) Equipment On-Site But Not Constructed or Operational Equipment Operating Without A Permit * Compliance Plan Registration/Certification Streamlined Standard Permit	Change of Conc Change of Conc Change of Loca	ication ication without Prior Appr dition dition without Prior Appro	val *	Existing or Previous Permit/Application If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number: 472156
7b. Facility Permits:		rating with an Expired/Ina		
Title V Application or Amendment (Refer to Title V Matrix)				
RECLAIM Facility Permit Amendment				3 full years) may apply (Rule 301(c)(1)(D)(i)).
8a. Estimated Start Date of Construction (mm/dd/yyyy): 8b. Est	imated End Date of C	construction (mm/dd/yyy	y): 8c. Estimated S	tart Date of Operation (mm/dd/yyyy):
Description of Equipment or Reason for Compliance Plan (list Increase to Annual Start-ups and Add Blackstart for the Compliance Plan (list Increase to Annual Start-ups and Equipment (list Increase to Annual Start-ups)	and the second second		pment, how many addi eing submitted with th ed for each equipment /	is application?
The state of the s	? No C Yes		Violation (NOV) or a No en issued for this equip If Yes, provide NO	oment? No Yes
Section E - Facility Business Information				
 What type of business is being conducted at this equipment Power generation 	location?		ness primary NAICS Conductrial Classification Sy	
15 Are there other facilities in the SCAOMD	No • Yes	16. Are there any sch		No
Section F - Authorization/Signature I hereby certify to	hat all information con	tained herein and informa	ation submitted with this	application are true and correct.
17. Signature of Responsible Official:	8. Title of Responsib Plant Manage		19. I wish to review th (This may cause a application proces	
20. Print Name: 2 Dennis Johnson 2	1. Date: 214 2	12	22. Do you claim con data? (If Yes, see	
23. Check List: X Authorized Signature/Date	Form 400-CEQA	Supplementa	Form(s) (ie., Form 400	0-E-xx) X Fees Enclosed
AQMD USE ONLY APPLICATION TRACKING # CHECK # AMOU	INT RECEIVED	PAYMENT TRACK	KING#	VALIDATION
DATE APP DATE APP CLASS BASIC EI	QUIPMENT CATEGORY	CODE TEAM ENGINEE	REASON/ACTION TA	KEN



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

Section A - Operator Information				
1. Facility Name (Business Name of Operator to Appear on the Perm	it):			d AQMD Facility ID (Available On
Sentinel Energy Center, LLC			Pe	mit Or Invoice Issued By AQMD):
3. Owner's Business Name (If different from Business Name of Oper	rator):			152707
Section B - Equipment Location Address		Section C - Permit	Mailing Address	
	Various Location of initial site.)	5. Permit and Corresp		ress
Street Address	ator	Address Desert Hot Sprin City David Wells Contact Name (760) 288-7901 Phone # E-Mail: D.Wells@d	Ext. Fa	
Section D - Application Type		L Maii.	9	
6. The Facility Is: Not In RECLAIM or Title V	C In RECLAIM	O In Title V	● In RECLAIM & Title V	Programs
7. Reason for Submitting Application (Select only ONE):	III NEGLATIVI	III TIME V	S III KECEMINI & THE V	i regiunia
7a. New Equipment or Process Application:	7c. Equipment or P	Process with an Existing	/Previous Application or Pe	mit:
	- 1000	. /	gr. revious Application of Fel	········
New Construction (Permit to Construct) Equipment On-Site But Not Constructed or Operational Equipment Operating Without A Permit * Compliance Plan Registration/Certification Streamlined Standard Permit	Change of Con-	fication fication without Prior Appl dition dition without Prior Appro		Existing or Previous Permit/Application you checked any of the items in you MUST provide an existing Permit or Application Number: 472158
7b. Facility Permits:	Change of Loca	ation without Prior Approv	al*	472100
Title V Application or Amendment (Refer to Title V Matrix) RECLAIM Facility Permit Amendment		erating with an Expired/Ina essing Fee and additional An		ears) may apply (Rule 301(c)(1)(D)(i)).
8a. Estimated Start Date of Construction (mm/dd/yyyy): 8b. Esti	mated End Date of C	Construction (mm/dd/yyy	y): 8c. Estimated Start D	ate of Operation (mm/dd/yyyy):
Description of Equipment or Reason for Compliance Plan (list Increase to Annual Start-ups and Add Blackstart for Compliance Plan (list Increase to Annual Start-ups and Executive Plan (list Increase to Annu		applications are b	pment, how many additional leing submitted with this app red for each equipment / proce	lication?
7. The Control of the	? No 🔘 Yes	Comply (NC) ber	Violation (NOV) or a Notice to en issued for this equipment If Yes, provide NOV/NC#	? No res
Section E - Facility Business Information				
What type of business is being conducted at this equipment Power generation	location?		ness primary NAICS Code? dustrial Classification System)	221112
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?	No Yes	16. Are there any sch		No
	nat all information con		ation submitted with this applica	ation are true and correct.
	3. Title of Responsib Plant Manage	le Official:	19. I wish to review the per (This may cause a delay application process.)	mit prior to issuance.
20. Print Name: 2 Dennis Johnson 2	1. Date: U4/2	2	22. Do you claim confident data? (If Yes, see instru	
23. Check List: X Authorized Signature/Date	Form 400-CEQA	■ Supplementa	l Form(s) (ie., Form 400-E-xx) X Fees Enclosed
AQMD USE ONLY APPLICATION TRACKING # CHECK # AMOU	NT RECEIVED	PAYMENT TRACE	KING#	VALIDATION
DATE APP DATE APP CLASS BASIC EC	QUIPMENT CATEGORY	CODE TEAM ENGINE	ER REASON/ACTION TAKEN	

South Coast

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

Section A - Operator Information	
1. Facility Name (Business Name of Operator to Appear on the Permit):	2. Valid AQMD Facility ID (Available On
Sentinel Energy Center, LLC	Permit Or Invoice Issued By AQMD):
3. Owner's Business Name (If different from Business Name of Operator):	152707
Section B - Equipment Location Address	Section C - Permit Mailing Address
4. Equipment Location Is: (For equipment operated at various locations, provide address of initial site.) 15775 Melissa Lane	
Street Address	Address
North Palm Springs , CA 92258 Zip	Desert Hot Springs , CA 92240 City State Zip
David Wells EHS Coordinator	David Wells EHS Coordinator
Contact Name Title	Contact Name Title
(760) 288-7901	(760) 288-7901
Phone # Ext. Fax #	Phone # Ext. Fax #
E-Mail: D.Wells@dgc-ops.com	E-Mail: D.Wells@dgc-ops.com
Section D - Application Type	
6. The Facility Is: ONOT IN RECLAIM OF TITLE V IN RECLAIM	O In Title V
7. Reason for Submitting Application (Select only ONE):	
7a. New Equipment or Process Application: 7c. Equipment of	r Process with an Existing/Previous Application or Permit:
New Construction (Permit to Construct) Administration	
C Equipment On-Site But Not Constructed or Operational Alteration/Me	dification Existing or Previous Permit/Application
C Equipment Operating Without A Permit *	dification without Prior Approval * If you checked any of the items in
Compliance Plan Change of C	ondition 7c., you MUST provide an existing
	ondition without Prior Approval * Permit or Application Number:
C Streamlined Standard Permit Change of L	ocation
7b. Facility Permits:	cation without Prior Approval *
C Title V Application or Amendment (Refer to Title V Matrix)	perating with an Expired/Inactive Permit *
[이 네 그렇게 살아가 되었다면서 이 사람들이 아이들에 이 아이들에게 되었다면 하는데 아니라 이 네를 되었다. 그리고 나를 되었다. 그리고 없는 그 없는 그 없는 그 없는 그 없는 것이다.	ocessing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(i)).
	f Construction (mm/dd/yyyy): 8c. Estimated Start Date of Operation (mm/dd/yyyy):
Description of Equipment or Reason for Compliance Plan (list applicable rule): Black Start Megapack Island	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 <u>OR</u> 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#:
Section E - Facility Business Information	
What type of business is being conducted at this equipment location? Power 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 I hereby certify that all information of	ontained herein and information submitted with this application are true and correct.
17. Signature of Responsible Official: 18. Title of Respon Plant Mana	(This may cause a delay in the
20. Print Name: Dennis Johnson 21. Date:	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)
AQMD APPLICATION TRACKING # CHECK # AMOUNT RECEIVED \$	PAYMENT TRACKING # VALIDATION
DATE APP DATE APP CLASS BASIC EQUIPMENT CATEGO CONTROL	RY CODE TEAM ENGINEER REASON/ACTION TAKEN

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

Section A - Operator Information				
1. Facility Name (Business Name of Operator to Appear on the Permit):				2. Valid AQMD Facility ID (Available On
Sentinel Energy Center, LLC				Permit Or Invoice Issued By AQMD):
3. Owner's Business Name (If different from Business Name of Operator):	t			152707
Section B - Equipment Location Address		Section C - I	Permit Mailing Address	
	ious Location iitial site.)	5. Permit and C	orrespondence Information ere if same as equipment loc	
Street Address North Palm Springs , CA 92258		Address Desert Hot	Springs	, CA 92240
City Zip David Wells EHS Coordinator Contact Name Title		David Wells Contact Name (760) 288-7		State Zip EHS Coordinator Title
(760) 288-7901 Phone# Ext. Fax# E-Mail: D.Wells@dgc-ops.com		Phone #	Ext.	Fax#
Section D - Application Type				
	In RECLAIM	O In Title	V @ In RECLAIM	& Title V Programs
7. Reason for Submitting Application (Select only ONE):	III (COLPAIN		, The Control	a ma v regione
	Fauinment or P	rocess with an I	Existing/Previous Applicati	on or Permit:
			-Moungh to House Alphioun	
	Administrative (Existing or Previous
	Alteration/Modif			Permit/Application
	Alteration/Modif		ior Approval	If you checked any of the items in
[TOTAL ST. ST. A. C.	Change of Cond			7c., you MUST provide an existing
C Registration/Certification	Change of Cond	dition without Pric	r Approval *	Permit or Application Number:
C Streamlined Standard Permit	Change of Loca	tion		
7b. Facility Permits:	Change of Loca	tion without Prior	Approval *	
Title V Application or Amendment (Refer to Title V Matrix)	Equipment Ope	rating with an Exp	oired/Inactive Permit *	
	Higher Permit Proce	essing Fee and add	tional Annual Operating Fees (u	to 3 full years) may apply (Rule 301(c)(1)(D)(i)).
REGEARN Facility Fernite Afficiation	ed End Date of C			d Start Date of Operation (mm/dd/yyyy):
oa. Estimated Start Date of Construction (him/du/yyyy).	d Life Date of C	onstruction (iiii	iddiyyyyi. oc. Estimate	a start bate of operation (minutes),,,,,
Description of Equipment or Reason for Compliance Plan (list appl RECLAIM/Title V Facility Permit Amendment	licable rule):	application	al equipment, how many a ns are being submitted with A required for each equipme	this application?
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 <u>OR</u> a not-for-profit training center) No	○ Yes		tice of Violation (NOV) or a NC) been issued for this ed If Yes, provide	quipment? No Yes
Section E - Facility Business Information				
 What type of business is being conducted at this equipment locat Power generation 	tion?		ur business primary NAICS rican Industrial Classification	
15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator?	Yes	1000 feet o	any schools (K-12) within of the facility property line?	
				his application are true and correct.
And the second s	le of Responsib Iant Manage		19. I wish to review (This may cause application pro	
20. Print Name: Dennis Johnson	te: 2/4/1	u	22. Do you claim o data? (If Yes,	confidentiality of see instructions.) No Yes
23. Check List: X Authorized Signature/Date For	rm 400-CEQA	Suppl Suppl	emental Form(s) (ie., Form	400-E-xx) X Fees Enclosed
AQMD APPLICATION TRACKING # CHECK # AMOUNT RE	ECEIVED	PAYMEN	T TRACKING#	VALIDATION
	MENT CATEGORY	CODE TEAM	ENGINEER REASON/ACTION	ITAKEN

Form 400 - XPP

Express Permit Processing Request
Form 400-A, Form 400-CEQA and one or more 400-E-xx form(s) must accompany all submittals.

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

1. Facility Name (Business Name of Operator Sentinel Energy Center, LL		2. Valid AQMD Facility ID (AQMD):	Available On Permit Or Invoice Issued B 152707
Section B - Equipment Location Add	dress	Section C - Permit Mailing Address	
3. Fixed Location (For equipment operated at various lo 15775 Melissa Lane	Various Location ocations, provide address of initial site.)	4. Permit and Correspondence Information: Check here if same as equipment loca P.O Box 1328	
Street Address		Address	
North Palm Springs	.CA 92258	Desert Hot Springs	CA 92240
City	State Zip	City	State Zip
David Wells	EHS Coordinator	David Wells	EHS Coordinator
Contact Name	Title	Contact Name	Title
(760) 288-7901		(760) 288-7901	
Phone # Ext.	Fax#	Phone # Ext.	Fax#
D.Wells@dgc-ops.com		D.Wells@dgc-ops.com	
E-Mail		E-Mail	
Section D - Authorization/Signature			
I understand that the Exped		s must be submitted at the time	
and that the application may Permit Processing neither g Express Permit Processing	uarantees action by any sp is subject to availability of ited fees will not be refund	pecific date nor does it guarante qualified staff; and that once Ex ed. I hereby certify that all infor	e permit approval; that press Permit Processing
and that the application may Permit Processing neither g Express Permit Processing has commenced, the exped	uarantees action by any sp is subject to availability of ited fees will not be refund	pecific date nor does it guarante qualified staff; and that once Ex ed. I hereby certify that all infor	e permit approval; that press Permit Processing
and that the application may Permit Processing neither g Express Permit Processing has commenced, the exped and information submitted v	uarantees action by any sp is subject to availability of ited fees will not be refund	pecific date nor does it guarante qualified staff; and that once Ex ed. I hereby certify that all inform a and correct.	e permit approval; that press Permit Processing mation contained herein

AQMD USE ONLY	P	APPLICA	TION TRAC	KING#		TYPE B C	EQUIPMENT CATEGORY CODE:	FEE SCHEDULE \$		VALIDATION
ENG. DATE	A	R	ENG. DATE	Α	R	CLASS I III	ASSIGNMENT Unit Engineer	CHECK/MONEY ORDER #	\$ AMOUNT	TRACKING #



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.agmd.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 project 1 has the potential to generate significant adverse environmental impacts that might require preparation of a CEQA document [CEQA Guidelines § 15060(a)]. Form 400-CEQA and the instructions for guidance on completing this form are available at http://www.agmd.gov/home/regulations/cega/cega-permit-forms or http://www.agmd.gov/home/permits/ permit-application-forms. For each Form 400-A application, also complete and submit one Form 400-CEOA. If submitting multiple Form 400-A applications for the same project at the same time, only one Form 400-CEQA is necessary for the entire project. If you need assistance completing this form, contact Permit Services at (909) 396-3385.

Secti	on A -	Facili	ty Information
			rgy Center, LLC 2. SCAQMD Facility ID: 152707
	oject De Creas	3 3000	nual Start-ups for All Eight (8) Units and Add Blackstart at Facility
Secti	on B –	Revie	ew For Exemption From Further CEQA Action
			No" as applicable. If "Yes" is checked for any question in Section B, skip Section C and proceed to page 2 and D - Signatures.
	Yes	No	Is this application for:
1.	0	0	A request for a change of operator only (without equipment or process change modifications)?
2.	0	0	A functionally identical permit unit replacement with no increase in equipment unit rating or emissions?
3.	0	0	A change of daily VOC permit limit to a monthly VOC permit limit?
4.	0	0	Equipment damaged as a result of a disaster during state of emergency?
5.	0	0	A Title V (e.g., SCAQMD Regulation XXX) permit renewal without equipment or process change modifications?
6.	0	0	A Title V administrative permit revision?
7.	0	0	The conversion of an existing permit into an initial Title V permit?
Secti	on C -	Revie	ew of Impacts Which May Trigger Further CEQA Review
			No" as applicable. To avoid delays in processing your application(s), explain all "Yes" responses on a separate it to this form.
	Yes	No	
1.	0	0	Is this project specifically evaluated in a previously certified or adopted CEQA document? If "Yes" is checked, attach a copy of the signed Notice of Determination to this form.
2.	0	0	Is this project specifically exempted from CEQA by another entity (e.g., city or agency)? If "Yes" is checked, attach a copy of the signed Notice of Exemption or other documentation from the entity to this form.
3.	0	0	Is this project part of a larger project? If "Yes" is checked, attach a separate sheet to briefly describe the larger project.
4.	0	0	Will the 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 listed on Form 400-CEQA, Table 1 - Regulated Substances List and Threshold Quantities for Accidental Release Prevention [http://www.agmd.gov/home/regulations/ceqa/ceqa-permit-forms]? If "Yes" is checked, attach a separate sheet to identify each hazardous material and corresponding quantity to be transported, stored, or used.
5.	0	0	Will the project emit any air toxic listed on Form 400-CEQA, Table 2 - Other Air Toxics and Their Screening Levels [http://www.aqmd.gov/home/regulations/cega/cega-permit-forms] ² ? If "Yes" is checked, attach a separate sheet to identify each air toxic and corresponding quantity to be emitted.
6,	0	0	Will the project require any demolition, excavation, and/or grading construction activities that encompass an area exceeding 20,000 square feet?

approved by the Office of Environmental Health Hazards Assessment (OEHHA) or have a combination of OEHHA-approved and non-approved CPs or RELs.

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.

Form 400-CEQA, Table 2 – Other Air Toxics and Their Screening Levels, contains a list of air toxics that either do not have a cancer potency (CP) or reference exposure level (REL)

Secti	on C -	Revie	w of Impacts W	hich May Trigger Further CEQA	(concluded)
	Yes	No			
7.	0	0	liquefied petrole fuel use via on the	eum gas (LPG), or landfill gas)? If " Greenhouse Gas (GHG) online estimate	mbustion equipment that uses fuel (e.g., gasoline, diesel, natural gas, Yes" is checked, then the applicant will need to calculate the amount of GHGs from or [http://www.agmd.gov/home/regulations/cega/cega-permit-forms], and and providing the documentation. Refer to the Instructions for Form 400-CEQA for
8.	0	0	chemicals listed	on Form 400-CEQA, Table 3 - Gree checked, attach a separate sheet to ide	ot addressed in Question 7 that require the use of, or will generate, any nhouse Gases [http://www.agmd.gov/home/regulations/cega/cega-permitentify each equipment unit, the chemical name(s), and the quantity of each
9.	0	0		include the open outdoor storage (, include a plot plan with the application	of dry bulk solid materials that could generate dust?
10.	0	0	permit requirem	nents? For example, landfills, materials	e off-site odors from activities that may not be subject to SCAQMD is recovery/recycling facilities (MRF), and compost materials or other types of the potential to generate odor complaints subject to SCAQMD Rule 402 —
11.	0	0	Will the project	cause an increase of emissions fro	m marine vessels, trains and/or airplanes?
12.	0	0	The following exa generates steam; the production pro lines, sewage hool for the project; 6)	mples identify some, but not all, types 2) a project that uses water as part of o cess; 4) a project that requires a new, c-ups etc.; 5) a project where the water	e water at the facility by more than 262,820 gallons per day? of projects that may result in a "Yes" answer to this question: 1) a project that perating air pollution control equipment; 3) a project that requires water as part of or the expansion of an existing, sewage treatment facility, new water lines, sewage demand exceeds the capacity of the local water purveyor to supply sufficient water pansion of existing, water supply and conveyance facilities; and, 7) a project that or structural integrity.
13.	0	0			ow of effluents to a public wastewater treatment facility that would Pollutant Discharge Elimination System (NPDES) or other related permit
14.	0	0	Will the project	result in the need for more than 3	50 new employees?
15.	0	0	Will the project truck round-trip	그렇게 하는 어느 그 사람들이 되었다. 그는 사람들이 되었다면 그렇게 하는 것이 되었다면 하는데 그 그 때문에 다른데 그 사람들이 되었다면 하는데 그렇게 되었다면 하는데 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면	transport truck traffic to and/or from the facility by more than 350
16.	0	0	Will the project	result in an increase in customer to	raffic by more than 700 visits per day?
17.	0	0	Will the project noise ordinance		noise or vibration in excess of what is allowed by the applicable local
18.	0	0			or additional solid waste disposal? te to be generated by the project is less than five tons per day.
19.	0	0		projected potential amount of hazardou	or additional hazardous waste disposal? Is wastes to be generated by the project is less than 42 cubic yards per day (or
20.	0	0	Will the project surroundings or	가진 것이 가장 살아 있는 사람들이 아이들이 가장 보고 있다. 아이들이 얼마를 만들어 되었다고 하는 것이다.	llation or modification will change the visual character of the site and its
21.	0	0	Will the project	have equipment that will create a	new source of external lighting that will be visible at the property line?
Secti	on D -	SIGN	ATURES		
UNDER		THAT TI			MITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I RVES THE RIGHT TO CONSIDER OTHER PERTINENT INFORMATION IN DETERMINING CEQA
			ible Official of Firm:	M	2. Title of Responsible Official of Firm: Plant Manager
3. Prin	Name o	f Respo	nsible Official of Firm:	Dennis Johnson	4. Date Signed: 7.14 17.7
(70	30) 28	8-790		6. Fax # of Responsible Official of Firm:	7. Email of Responsible Official of Firm: D.Johnson@dgc-ops.com
8. Sign	ature of	Prepare	r, (If prepared by perso	on other than responsible official of firm):	9. Title of Preparer: Senior Scientist, Yorke Engineering, LLC
10. Pri	nt Name	of Prepa	arer: Eduardo Jir	menez	11. Date Signed:
	one # of 1 49) 39		4	13. Fax # of Preparer: (949) 248-8499	2/3/2022 14. Email of Preparer: EJimenez@YorkeEngr.com

Form 500-C1

Title V Compliance Status Report

To provide the compliance status of your facility with applicable federally enforceable requirements and identify other local-only requirements, complete this form and attach it to a completed compliance certification Form 500-A2. As appropriate, all submittals of Form 500-C2 as appropriate should also be attached to this form.

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Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit):

Sentinel Energy Center, LLC

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

152707

PROCEDURES FOR DETERMINING COMPLIANCE STATUS

- Equipment verification: Review the list of pending applications, and either the preliminary Title V facility permit or the list of current permits to operate that the AQMD provided you, to determine if they completely and accurately describe all equipment operating at the facility. Attach a statement to describe any discrepancies.
- Identify applicable requirements*: Use the checklist in Section II to identify all applicable and federally-enforceable local, state, and federal rules and regulations, test methods, and monitoring, recordkeeping and reporting (MRR) requirements that apply to any equipment or process (including equipment exempt from a permit by Rule 219) at your facility. The potential applicable requirements, test methods and MRR requirements are identified and listed adjacent to each given equipment/process description. Check off each box adjacent to the corresponding requirement as it applies to your particular equipment/process. Note: Even if there is only one piece of equipment that is subject to a particular requirement, the appropriate box should be checked.
- Identify additional applicable requirements*: Use Section III to identify any additional requirements not found in Section II. Section II is not a complete list of all applicable requirements. It does not include recently adopted NESHAP regulations by EPA or recent amendments to AQMD rules. Do not add rules listed in Section V here.
- Identify any requirements that do not apply to a specific piece of equipment or process: Also use Section III to identify any requirements that are listed in Section II but that do not apply to a specific piece of equipment or process. Fill out Section III of this form and attach a separate sheet to explain the reason(s) why the identified rules do not apply. Note: Listing any requirement that does not apply to a specific piece of equipment will not provide the facility with a permit shield unless one is specifically requested by completing Form 500-D and is approved by AQMD.
- Identify SIP-approved rules that are not current AQMD rules: Use Section IV to identify older versions of current AQMD rules that are the EPA-approved versions in the State Implementation Plan (SIP), and that are still applicable requirements as defined by EPA. The facility is not required to certify compliance with the items checked in Section IV provided that the non-SIP approved rule in Section II is at least as stringent as the older SIP-approved version in Section IV. **
- Identify Local-Only Enforceable Regulatory Requirements: Use Section V to identify AQMD rules that are not SIP-approved and are not federally enforceable.
- Determine compliance: Determine if all equipment and processes are complying with all requirements identified in Sections II and III. If each piece of equipment complies with all applicable requirements, complete and attach Form 500-A2 to certify the compliance status of the facility. If any piece of equipment is not in compliance with any of the applicable requirements, complete and attach Form 500-C2 in addition to Form 500-A2.
- The following AQMD rules and regulations are not required to be included in Section II and do not have to be added to Section III: Regulation I, List and Criteria in Regulation II, Rule 201, Rule 201.1, Rule 202, Rule 203, Rule 205, Rule 206, Rule 207, Rule 208, Rule 209, Rule 210, Rule 212, Rule 214, Rule 215, Rule 216, Rule 217, Rule 219, Rule 220, Rule 221, Regulation III, Regulation V, Regulation VIII, Regulation XII, Regulation XV, Regulation XVI, Regulation XXI, Regulation XXI, Regulation XXI, and Regulation XXI.

Emission units adversely affected by the gap between current and SIP-approved versions of rules may initially be placed in a non-Title V portion of the permit

Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
All Air Pollution Control Equipment Using Combustion (RECLAIM & non-RECLAIM sources)	Rule 480 (10/07/77)	N/A	N/A
All Coating Operations (12/15/00)	Rule 442	Rule 442(f)	Rule 442(g)
All Combustion Equipment, ≥ 555 Mmbtu/Hr (except for NOx RECLAIM sources)	Rule 474 (12/04/81)	AQMD TM 7.1 or 100.1	
All Combustion Equipment Except Internal Combustion Engines (RECLAIM & non-RECLAIM sources)	Rule 407 (04/02/82) Rule 409 (08/07/81)	✓ AQMD TM 100.1 or 10.1, 307-91 ✓ AQMD TM 5.1, 5.2, or 5.3	
All Combustion Equipment Using Gaseous Fuel (except SOx RECLAIM sources)	Rule 431.1 (06/12/98)	Rule 431.1(f)	Rule 431.1(d) & (e)
All Combustion Equipment Using Liquid Fuel (except SOx RECLAIM sources)	Rule 431.2 (09/15/00)	Rule 431.2(g)	Rule 431.2(f)
All Combustion Equipment Using Fossil Fuel (except SOx RECLAIM sources)	Rule 431.3 (05/07/76)		
√ All Equipment	Rule 401 (11/09/01) Rule 405 (02/07/86) Rule 408 (05/07/76) Rule 430 (07/12/96) Rule 701 (06/13/97) New Source Review, BACT	✓ California Air Resources Board Visible Emission Evaluation AQMD TM 5.1, 5.2, or 5.3 N/A	√ Rule 430(b)
	Rule 1703 (10/07/88) 40 CFR68 - Accidental Release Prevention	See Applicable Subpart	See Applicable Subpart
All Equipment Processing Solid Materials	Rule 403 (06/03/05)	Rule 403(d)(3)	Rule 403(f)
All Equipment With Exhaust Stack (except cement kilns subject to Rule 1112.1)	Rule 404 (02/07/86)	AQMD TM 5.1, 5.2, or 5.3	
✓ All Facilities Using Solvents to Clean Various Items or Equipment	✓ Rule 109 (05/02/03)✓ Rule 1171 (05/01/09)40 CFR63 SUBPART T	Rule 109(g) ✓ Rule 1171(e) See Applicable Subpart	✓ Rule 109(c) ✓ Rule 1171(c)(6) See Applicable Subpart
✓All RECLAIM Equipment (NOx & SOx)	Reg. XX - RECLAIM	Rule 2011, App. A (05/06/05) Rule 2012, App. A (05/06/05)	Rule 2011, App. A (05/06/0
	Rule 1140 (08/02/85)	Rule 1140(d) & (e), AQMD Visible	

quipment/Process	Applicable Requirement	Test Method	MRR Requirement
Aggregate and Related Operations	Rule 1157 (09/08/06)	Rule 1157(f)	Rule 1157(e)
Appliances Containing Ozone Depleting Substances (except Motor Vehicle Air Conditioners): Manufacturing, Repair, Maintenance, Service, & Disposal	40 CFR82 SUBPART F	See Applicable Subpart	See Applicable Subpart
Asphalt	See Manufacturing, Asphalt Processing & Aspl	nalt Roofing	
Asphalt Concrete/Batch Plants	40 CFR60 SUBPART I	See Applicable Subpart	See Applicable Subpart
Benzene Emissions, Maleic Anhydride Plants, Ethylbenzene/Styrene Plants, Benzene Storage Vessels, Benzene Equipment Leaks, & Coke By-Product Recovery Plants	Rule 1173 (02/06/09) Rule 1176 (09/13/96) 40 CFR61 SUBPART L 40 CFR63 SUBPART R 40 CFR63 SUBPART CC	Rule 1173(j) Rule 1176(h) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart	Rule 1173(i) Rule 1176(f) & (g) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart
Benzene Transfer Operations	Rule 1142 (07/19/91) 40 CFR61 SUBPART BB 40 CFR63 SUBPART Y	Rule 1142(e) See Applicable Subpart See Applicable Subpart	Rule 1142(h) See Applicable Subpart See Applicable Subpart
Benzene Waste Operations	Rule 1176 (09/13/96) 40 CFR61 SUBPART FF 40 CFR63 SUBPART CC	Rule 1176(h) See Applicable Subpart See Applicable Subpart	Rule 1176(f) & (g) See Applicable Subpart See Applicable Subpart
Beryllium Emissions	40 CFR61 SUBPART C	See Applicable Subpart	See Applicable Subpart
Beryllium Emissions, Rocket Motor Firing	40 CFR61 SUBPART D	See Applicable Subpart	See Applicable Subpart
Boiler, < 5 Mmbtu/Hr (non-RECLAIM sources)	Rule 1146.1 (09/05/08) Rule 1146.2 (05/05/06) 40 CFR63 SUBPART DDDDD	Rule 1146.1(d) N/A See Applicable Subpart	Rule 1146.1(c)(2) & (c)(3) N/A See Applicable Subpart
Boiler, < 5 Mmbtu/Hr (RECLAIM sources)	Rule 1146.1 (09/05/08) - excluding NOx requirements	Rule 1146.1(d)	Rule 1146.1(c)(2) & (c)(3)
	40 CFR63 SUBPART DDDDD	See Applicable Subpart	See Applicable Subpart

Section II - Applicable Requirements, Tes	t Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Boiler, ≥ 5 Mmbtu/Hr (non-RECLAIM sources)	Rule 218 (05/14/99) Rule 429 (12/21/90) Rule 475 (08/07/78) Rule 476 (10/08/76)	AQMD TM 100.1 N/A AQMD TM 5.1, 5.2, or 5.3 AQMD TM 7.1, 100.1, 5.1, 5.2, or 5.3	Rule 218(e) & (f) Rule 429(d) Rule 1146(c)(6) & (c)(7)
	Rule 1146 (09/05/08) 40 CFR60 SUBPART D 40 CFR60 SUBPART Da 40 CFR60 SUBPART Dc 40 CFR63 SUBPART DDDDD	Rule 1146(d) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart
Boiler, ≥ 5 Mmbtu/Hr (RECLAIM sources)	Rule 475 (08/07/78) Rule 476 (10/08/76) - excluding NOx requirements Rule 1146 (09/05/08) - excluding NOx requirements Rule 2011 (05/06/05) Or Rule 2012 (05/06/05) 40 CFR60 SUBPART D 40 CFR60 SUBPART Dc 40 CFR63 SUBPART DDDDD	AQMD TM 5.1, 5.2, or 5.3 AQMD TM 7.1, 100.1, 5.1, 5.2, or 5.3 Rule 1146(d) Rule 2011, App. A (05/06/05) Or Rule 2012, App. A (05/06/05) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart	Rule 1146(c)(6) & (c)(7) Rule 2011, App. A (05/06/05) Or Rule 2012, App. A (05/06/05) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart
Boiler, Petroleum Refining (non-RECLAIM sources)	Rule 218 (05/14/99) Rule 429 (12/21/90) Rule 431.1 (06/12/98) Rule 475 (08/07/78) Rule 1146 (09/05/08) 40 CFR60 SUBBPART J 40 CFR63 SUBPART DDDDD	AQMD TM 100.1 N/A Rule 431.1(f) AQMD TM 5.1, 5.2, or 5.3 Rule 1146(d) See Applicable Subpart See Applicable Subpart	Rule 218(e) & (f) Rule 429(d) Rule 431.1(d) & (e) Rule 1146(c)(6) & (c)(7) See Applicable Subpart See Applicable Subpart

KEY ABBREVIATIONS:	Reg. = AQMD Regulation Rule = AQMD Rule	App. = Appendix AQMD TM = AQMD Test Method	CFR = Code of Federal Regulations CCR = California Code of Regulations

Section II - Applicable Requirements, Tes	st Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Boiler, Petroleum Refining (RECLAIM sources)	Rule 1146 (09/05/08) - excluding NOx requirements	Rule 1146(d)	Rule 1146(c)(6) & (c)(7)
	Rule 2011 (05/06/05)	Rule 2011, App. A (05/06/05)	Rule 2011, App. A (05/06/05)
	Rule 2012 (05/06/05) 40 CFR60 SUBPART J	Rule 2012, App. A (05/06/05) See Applicable Subpart	Rule 2012, App. A (05/06/05) See Applicable Subpart
	40 CFR63 SUBPART DDDDD	See Applicable Subpart	See Applicable Subpart
Boilers, Electric Utility (non-RECLAIM	Rule 218 (05/14/99)	AQMD TM 100.1	Rule 218(e) & (f)
sources)	Rule 429 (12/21/90) Rule 1135 (07/19/91)	Rule 1135(e)	Rule 429(d) Rule 1135(e)
	40 CFR60 SUBPART Db	See Applicable Subpart See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART DDDDD		See Applicable Subpart
Boilers, Electric Utility (RECLAIM sources)	Rule 2012 (05/06/05)	Rule 2012, App. A (05/06/05) See Applicable Subpart	Rule 2012, App. A (05/06/05) See Applicable Subpart
	40 CFR60 SUBPART Db	See Applicable Subpart	See Applicable Subpart
Bulk Loading Of Organic Liquids	Rule 462 (05/14/99)	Rule 462(f)	Rule 462(g) See Applicable Subpart
	40 CFR60 SUBPART XX	See Applicable Subpart See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART BBBBBB 40 CFR63 SUBPART EEEE	See Applicable Subpart	See Applicable Subpart
Cadmium Electroplating Operation	Rule 1426 (05/02/03)		Rule 1426(e)
Calciner, Mineral Industries	40 CFR60 SUBPART UUU	See Applicable Subpart	See Applicable Subpart
Calciner, Petroleum Coke	Rule 477 (04/03/81)	AQMD Visible Emissions, AQMD TM 5.1, 5.2, or 5.3	
	Rule 1119 (03/02/79)	AQMD TM 6.1 or 100.1 See Applicable Subpart	See Applicable Subpart
Colombia da ma	40 CFR63 SUBPART L.	AQMD Test Protocol	
Charbroilers	Rule 1174 (10/05/90) Rule 1138 (11/14/97)	Rule 1138(g)	Rule 1138(d)
Chrome Plating & Chromic Acid Anodizing	Rule 1426 (05/02/03)		Rule 1426(e)
Operation	Rule 1469 (12/05/08)	Rule 1469(e)	Rule 1469(g), (j) & (k)

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Section II - Applicable Requirements, Test Methods, & MRR Requirements				
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement	
Coating Operation, Adhesive Application	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)	
Operation	Rule 481 (01/11/02)	Rule 481(d)		
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)	
	Rule 1168 (01/07/05)	Rule 1168(f) & (e)	Rule 1168(d)	
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)	
	40 CFR60 SUBPART RR	See Applicable Subpart	See Applicable Subpart	
Coating Operation, Aerospace Assembly &	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)	
Component Manufacturing	Rule 481 (01/11/02)	Rule 481(d)		
	Rule 1124 (09/21/01)	Rule 1124(e) & (f)	Rule 1124(j) & (d)	
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)	
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)	
	40 CFR63 SUBPART GG	See Applicable Subpart	See Applicable Subpart	
Coating Operation, Graphic Arts (Gravure,	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)	
Letter Press, Flexographic & Lithographic Printing Process, Etc.)	Rule 481 (01/11/02)	Rule 481(d)		
1 many 1 100000, E.O.,	Rule 1130 (10/08/99)	Rule 1130(h)	Rule 1130(e)	
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)	
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6) See Applicable Subpart	
	40 CFR60 SUBPART QQ	See Applicable Subpart		
	40 CFR60 SUBPART RR	See Applicable Subpart	See Applicable Subpart	
	40 CFR60 SUBPART FFF	See Applicable Subpart	See Applicable Subpart	
	40 CFR60 SUBPART VVV	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART KK	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART JJJJ	See Applicable Subpart	See Applicable Subpart	
Coating Operation, Magnet Wire Coating	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)	
	Rule 481 (01/11/02)	Rule 481(d)		
	Rule 1126 (01/13/95)	Rule 1126(d)	Rule 1126(c)(4)	
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)	
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)	

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lipment/Process	Applicable Requirement	Test Method	MRR Requirement
Coating Operation, Marine Coating (Except for	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
recreational equipment)	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1106 (01/13/95)	Rule 1106(e)	Rule 1106(c)(5)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR63 SUBPART II	See Applicable Subpart	See Applicable Subpart
Coating Operation, Metal Coating	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1107 (01/06/06)	Rule 1107(e)	Rule 1107(j)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR60 SUBPART EE	See Applicable Subpart	See Applicable Subpart
	40 CFR60 SUBPART SS	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART NNNN	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART MMMM	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART RRRR	See Applicable Subpart	See Applicable Subpart
Coating Operation, Metal Containers, Closure,	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
& Coil Coating Operations	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1125 (03/07/08)	Rule 1125(e)	Rule 1125(c)(6)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR60 SUBPART TT	See Applicable Subpart	See Applicable Subpart
	40 CFR60 SUBPART WW	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART KKKK	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART SSSS	See Applicable Subpart	See Applicable Subpart
Coating Operation, Motor Vehicle & Mobile	Rule 109 (05/02/03)	Rule 109(g)	Rule 109©
Equipment Non-Assembly Line Coating	Rule 481 (01/11/02)	Rule 481(d)	
Operation	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1151 (12/02/05)	Rule 1151(h)	Rule 1151(f)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)

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Section II - Applicable Requirements, Tes	st Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Coating Operation, Motor Vehicle Assembly	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
Line	Rule 481 (01/11/02)	Rule 481(d)	₁
	Rule 1115 (05/12/95)	Rule 1115(e)	Rule 1115(g)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR60 SUBPART MM	See Applicable Subpart	See Applicable Subpart
	☐ 40 CFR63 SUBPART IIII	See Applicable Subpart	See Applicable Subpart
Coating Operation, Paper, Fabric, & Film	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
Coating Operations	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1128 (03/08/96)	Rule 1128(f)	Rule 1128(e)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR60 SUBPART VVV	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART OOOO	See Applicable Subpart	See Applicable Subpart
Coating Operation, Plastic, Rubber, & Glass	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1145 (12/04/09)	Rule 1145(e)	Rule 1145(d)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6) See Applicable Subpart
	40 CFR60 SUBPART TTT	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART NNNN	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART PPPP	See Applicable Subpart	Gee Applicable Subpart
Coating Operation, Pleasure Craft	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1106.1 (02/12/99)	Rule 1106.1(e)	Rule 1106.1(d)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR63 SUBPART II	See Applicable Subpart	See Applicable Subpart

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Section II - Applicable Requirements, Tes	t Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Coating Operation, Screen Printing	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
	Rule 1130.1 (12/13/96)	Rule 1130.1(g)	Rule 1130.1(c)(5)
	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR63 SUBPART KK	See Applicable Subpart	See Applicable Subpart
✓ Coating Operation, Use Of Architectural	Rule 109 (05/02/03)	✓ Rule 109(g)	✓ Rule 109(c)
Coating (Stationary Structures)	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1113 (07/13/07)	Rule 1113(e)	
	Rule 1132 (05/05/06)	Rule 1132(f)	∟Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
Coating Operation, Wood Flat Stock	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
	Rule 481 (01/11/02)	Rule 481(d)	
	Rule 1104 (08/13/99)	Rule 1104(e)	Rule 1104(d)
•	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR63 SUBPART II	See Applicable Subpart	See Applicable Subpart
Coating Operation, Wood Products	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
(Commercial Furniture, Cabinets, Shutters,	Rule 481 (01/11/02)	Rule 481(d)	
Frames, Toys)	Rule 1132 (05/05/06)	Rule 1132(f)	Rule 1132(g)
	Rule 1136 (06/14/96)	Rule 1136(f)	Rule 1136(d) & (g)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR63 SUBPART JJ	See Applicable Subpart	See Applicable Subpart
Coater	See Coating Operations		
Columns	See Petroleum Refineries, Fugitive Emissions		
Composting Operation	Rule 1133 (01/10/03)		
	Rule 1133.1 (01/10/03)	Rule 1133.1(e)	Rule 1133.1(d)
	Rule 1133.2 (01/10/03)	Rule 1133.2(g)	Rule 1133.2(h)
Compressors	See Fugitive Emissions or Petroleum Refineries, I	Fugitive Emissions	
Concrete Batch Plants	See Nonmetallic Mineral Processing Plants		
Consumer Product Manufacturing	See Manufacturing, Consumer Product		
Cooling Tower, Hexavalent Chromium	40 CFR63 SUBPART Q	See Applicable Subpart	See Applicable Subpart
		Out of Falant David Cons	
KEY ABBREVIATIONS: Reg. = AQMD Regulation Rule = AQMD Rule		: Code of Federal Regulations - California Code of Regulations	

quipment/Process	Applicable Requirement	Test Method	MRR Requirement
Copper Electroplating Operation	Rule 1426 (05/02/03)		Rule 1426(e)
Crude Oil Production	See Oil Well Operations		
Crusher	See Nonmetallic Mineral Processing Plan	ts	
Dairy Farms and Related Operations	Rule 1127 (08/06/04)	Rule 1127(h)	Rule 1127(g)
Degreasers	Rule 109 (05/02/03) Rule 1122 (05/01/09) Rule 1171 (05/01/09) 40 CFR63 SUBPART T	Rule 109(g) Rule 1122(h) Rule 1171(e) See Applicable Subpart	Rule 109(c) Rule 1122(i) Rule 1171(c)(6) See Applicable Subpart
Dry Cleaning, Perchloroethlyene	Rule 1421 (12/06/02)	Rule 1421(e) & (i)	Rule 1421(g) & (h)
Dry Cleaning, Petroleum Solvent	Rule 109 (05/02/03) Rule 1102 (11/17/00) 40 CFR60 SUBPART JJJ	Rule 109(g) Rule 1102(g) See Applicable Subpart	Rule 109(c) Rule 1102(f) See Applicable Subpart
Dryers, Mineral Industries	40 CFR60 SUBPART UUU	See Applicable Subpart	See Applicable Subpart
Ethylene Oxide Sterilizer	See Sterilizer, Ethylene Oxide		
Flanges	See Fugitive Emissions or Petroleum Refi	ineries, Fugitive Emissions	
Fluid Catalytic Cracking Unit	Rule 218 (05/14/99) Rule 1105 (09/01/84) Rule 1105.1 (11/07/03)	AQMD TM 100.1 Rule 1105(c)(1) Rule 1105.1(f)	Rule 218(e) & (f) Rule 1105(c)(2) Rule 1105.1(e)
Foundries, Iron and Steel	40 CFR63 SUBPART EEEEE	See Applicable Subpart	See Applicable Subpart
Friction Materials Manufacturing	See Manufacturing, Friction Materials		
Fugitive Emissions, Benzene	Rule 1173 (12/06/02) 40 CFR61 SUBPART L 40 CFR63 SUBPART R 40 CFR63 SUBPART C	Rule 1173(j) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart	Rule 1173(i) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart

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Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Fugitive Emissions, Chemical Plant	Rule 466 (10/07/83)	Rule 466(f)	Rule 466(e)
	Rule 466.1 (03/16/84)	Rule 466.1(g)	Rule 466.1(h)
	Rule 467 (03/05/82)	Rule 467(f)	Rule 467(e)
	Rule 1173 (02/06/09)	Rule 1173(j)	Rule 1173(i)
	40 CFR60 SUBPART VV	See Applicable Subpart	See Applicable Subpart
	40 CFR61 SUBPART V	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART G	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart
	☐40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart
Fugitive Emissions, Natural Gas Processi	ng Rule 466 (10/07/83)	Rule 466(f)	Rule 466(e)
Plant	Rule 466.1 (03/16/84)	Rule 466.1(g)	Rule 466.1(h)
	Rule 467 (03/05/82)	Rule 467(f)	Rule 467(e)
	Rule 1173 (02/06/09)	Rule 1173(j)	Rule 1173(i)
	40 CFR60 SUBPART KKK	See Applicable Subpart	See Applicable Subpart
	40 CFR61 SUBPART V	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART G	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart

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Section II - Applicable Requirements, Tes	Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Fugitive Emissions, Oil & Gas Production	Rule 466 (10/07/83)	Rule 466(f)	Rule 466(e)
Facility	Rule 466.1 (03/16/84)	Rule 466.1(g)	Rule 466.1(h)
	Rule 467 (03/05/82)	Rule 467(f)	Rule 467(e)
	Rule 1173 (02/06/09)	Rule 1173(j)	Rule 1173(i)
	40 CFR61 SUBPART V	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART G	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart
Fugitive Emissions, Pipeline Transfer Station	Rule 466 (10/07/83)	Rule 466(f)	Rule 466(e)
<u>.</u>	Rule 466.1 (03/16/84)	Rule 466.1(g)	Rule 466.1(h)
	Rule 467 (03/05/82)	Rule 467(f)	Rule 467(e)
	Rule 1173 (02/06/09)	Rule 1173(j)	Rule 1173(i)
	40 CFR61 SUBPART V	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART G	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart
·	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart
Furnace, Basic Oxygen Process	40 CFR60 SUBPART Na	See Applicable Subpart	See Applicable Subpart
Furnace, Electric Arc, For Steel Plants: Constructed After August 17, 1983	40 CFR60 SUBPART AAa	See Applicable Subpart	See Applicable Subpart
Furnace, Electric Arc, For Steel Plants: Constructed After Oct. 21, 1974, & On Or Before Aug. 17, 1983	40 CFR60 SUBPART AA	See Applicable Subpart	See Applicable Subpart
Furnace, Glass Melting	Rule 1117 (01/06/84)	Rule 1117(c), AQMD TM 7.1 or 100.1	
	40 CFR60 SUBPART CC	See Applicable Subpart	See Applicable Subpart
Furnace, Lead Melting, Automotive Batteries	Rule 1101 (10/07/77)	AQMD TM 6.1	
<u> </u>	40 CFR63 SUBPART X	See Applicable Subpart	See Applicable Subpart
KEY ABBREVIATIONS: Reg. = AQMD Regulation Rule = AQMD Rule		= Code of Federal Regulations = California Code of Regulations	

Section II - Applicable Requirements, Tes	t Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Gasoline Transfer & Dispensing Operation	Rule 461 (06/03/05)	Rule 461(f)	Rule 461(e)(6) & (e)(7)
Glass Manufacturing	See Manufacturing, Glass		
Grain Elevators	40 CFR60 SUBPART DD	See Applicable Subpart	See Applicable Subpart
Halon-containing Equipment, Use for Technician Training, Testing, Maintenance, Service, Repair, or Disposal	40 CFR82 SUBPART H	See Applicable Subpart	See Applicable Subpart
Hazardous Waste Combustors	40 CFR63 SUBPART EEE	See Applicable Subpart	See Applicable Subpart
Heater, Asphalt Pavement	Rule 1120 (08/04/78)	AQMD Visible Emissions, AQMD TM 6.2	Rule 1120(f)
Heaters, Petroleum Refinery Process	Rule 429 (12/21/90) Rule 431.1 (06/12/98) Rule 1146 (09/05/08) 40 CFR60 SUBPART J 40 CFR63 SUBPART DDDDD	N/A Rule 431.1(f) Rule 1146(d) See Applicable Subpart See Applicable Subpart	Rule 429(d) Rule 431.1(d) & (e) Rule 1146(c)(6) & (c)(7) See Applicable Subpart See Applicable Subpart
Heaters, Process	See Boilers		
Incinerators	40 CFR60 SUBPART E 40 CFR60 SUBPART CCCC	See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart
Inorganic Arsenic Emissions, Arsenic Trioxide & Metallic Arsenic Production Facilities	40 CFR61 SUBPART P	See Applicable Subpart	See Applicable Subpart
Internal Combustion Engines, Reciprocating	Rule 1110.2 (07/09/10) 40 CFR60 SUBPART IIII and JJJJ 40 CFR63 SUBPART ZZZZ	Rule 1110.2(g) See Applicable Subpart See Applicable Subpart	Rule 1110.2(f) See Applicable Subpart See Applicable Subpart
Kiln, Cement Plant	Rule 1112 (06/06/86) Rule 1112.1 (12/04/09) 40 CFR60 SUBPART F	N/A N/A See Applicable Subpart	N/A N/A See Applicable Subpart

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Section II - Applicable Requirements, Tes			k gen musi nama dana makamana ang kalangan da kalangan maka na kalangan maka na kalangan maka na kalangan maka
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Landfills	Rule 1150 (10/15/82)	 	
 -	Rule 1150.1 (03/17/00)	Rule 1150.1(j)	Rule 1150.1(e) & (f)
	40 CFR60 SUBPART WWW	See Applicable Subpart	See Applicable Subpart
•	40 CFR63 SUBPART AAAA	See Applicable Subpart	See Applicable Subpart
Lead Acid Battery Manufacturing Plants	See Manufacturing, Lead Acid Battery		
Lead Electroplating Operation	Rule 1426 (05/02/03)		Rule 1426(e)
Manufacturing, Asphalt Processing & Asphalt	Rule 470 (05/07/76)	N/A	See Applicable Subpart
Roofing	Rule 1108 (02/01/85)	Rule 1108(b)	See Applicable Subpart
	Rule 1108.1 (11/04/83)	Rule 1108.1 (b)	
	40 CFR60 SUBPART UU	See Applicable Subpart	
	40 CFR63 SUBPART LLLLL	See Applicable Subpart	
Manufacturing, Brick & Structural Clay Products	40 CFR63 SUBPART JJJJJ	See Applicable Subpart	See Applicable Subpart
Manufacturing, Cement	Rule 1156 (03/06/09)	Rule 1156(g)	Rule 1156(f)
Manufacturing, Clay Ceramics	40 CFR63 SUBPART KKKKK	See Applicable Subpart	See Applicable Subpart
Manufacturing, Coatings & Ink	Rule 1141.1 (11/17/00)	N/A	Rule 1141.1(c)
(SIC Code 2851)	40 CFR63 SUBPART HHHHH	See Applicable Subpart	See Applicable Subpart
Manufacturing, Consumer Product	Title 17 CCR 94500		
Manufacturing, Food Product	Rule 1131 (06/06/03)	Rule 1131(e)	Rule 1131(d)
Manufacturing, Friction Materials	40 CFR63 SUBPART QQQQQ	See Applicable Subpart	See Applicable Subpart
Manufacturing, Glass	Rule 1117 (01/06/84)	Rule 1117(c), AQMD TM 7.1 or 100.1	
	40 CFR60 SUBPART CC	See Applicable Subpart	See Applicable Subpart
	40 CFR61 SUBPART N	See Applicable Subpart	See Applicable Subpart
Manufacturing, Hydrochloric Acid	40 CFR63 SUBPART NNNNN	See Applicable Subpart	See Applicable Subpart
Manufacturing, Lead-Acid Battery	40 CFR60 SUBPART KK	See Applicable Subpart	See Applicable Subpart
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ection II - Applicable Requirements, Te	Applicable Requirement	Test Method	MRR Requirement
quipment/Process			
Manufacturing, Lime	40 CFR63 SUBPART AAAAA	See Applicable Subpart	See Applicable Subpart
Manufacturing, Magnetic Tape Industry	40 CFR60 SUBPART SSS	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART EE	See Applicable Subpart	See Applicable Subpart
Manufacturing, Miscellaneous Organic Chemical	40 CFR63 SUBPART FFFF	See Applicable Subpart	See Applicable Subpart
Manufacturing, Nitric Acid	Rule 218 (05/14/99)	AQMD TM 100.1	Rule 218(e) & (f)
-	Rule 1159 (12/06/85)	AQMD TM 7.1 or 100.1	_
	40 CFR60 SUBPART G	See Applicable Subpart	See Applicable Subpart
Manufacturing, Plywood & Composite Wood	Rule 1137 (02/01/02)	N/A	Rule 1137(e)
Products	40 CFR63 SUBPART DDDD	See Applicable Subpart	See Applicable Subpart
Manufacturing, Polymer Industry	40 CFR60 SUBPART DDD	See Applicable Subpart	See Applicable Subpar
-	40 CFR63 SUBPART W	See Applicable Subpart	See Applicable Subpar
	40 CFR63 SUBPART J	See Applicable Subpart	See Applicable Subpart
Manufacturing, Polymeric Cellular Foam	Rule 1175 (09/07/07)	Rule 1175(f)	Rule 1175(e)
	40 CFR63 SUBPART UUUU	See Applicable Subpart	See Applicable Subpar
Manufacturing, Products Containing Halon Blends	40 CFR82 SUBPART H	See Applicable Subpart	See Applicable Subpar
Manufacturing, Products Containing Organic Solvents	Rule 443.1 (12/05/86)	N/A	N/A
Manufacturing, Products Containing Ozone	40 CFR82 SUBPART A	See Applicable Subpart	See Applicable Subpar
Depleting Substances (ODS)	40 CFR82 SUBPART E	See Applicable Subpart	See Applicable Subpar
Manufacturing, Reinforced Plastic Composites	40 CFR63 SUBPART WWWW	See Applicable Subpart	See Applicable Subpar
Manufacturing, Refractory Products	40 CFR63 SUBPART SSSSS	See Applicable Subpart	See Applicable Subpar
Manufacturing, Resin	Rule 1141 (11/17/00)	Rule 1141(d)	Rule 1141(c)
→	40 CFR63 SUBPART W	See Applicable Subpart	See Applicable Subpar
Manufacturing, Rubber Tire	40 CFR63 SUBPART XXXX	See Applicable Subpart	See Applicable Subpar
Manufacturing, Semiconductors	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)
_	Rule 1164 (01/13/95)	Rule 1164(e)	Rule 1164(c)(5)
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)
	40 CFR63 SUBPART BBBBB	See Applicable Subpart	See Applicable Subpar
Manufacturing, Solvent	Rule 443 (05/07/76)	N/A	N/A

quipment/Process	Applicable Requirement	Test Method	MRR Requirement
Manufacturing, Sulfuric Acid	Rule 469 (02/13/81) 40 CFR60 SUBPART H 40 CFR60 SUBPART Cd	AQMD TM 6.1 or 6.2 See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart
Manufacturing, Surfactant	Rule 1141.2 (01/11/02)	Rule 1141.2(e) AQMD TM 25.1	
Manufacturing, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes	40 CFR60 SUBPART III 40 CFR60 SUBPART NNN	See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart
Manufacturing, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes	40 CFR60 SUBPART RRR	See Applicable Subpart	See Applicable Subpart
Manufacturing, Vinyl Chloride	40 CFR61 SUBPART F	See Applicable Subpart	See Applicable Subpart
Manufacturing, Water Heaters	Rule 1121 (09/03/04)	N/A	N/A
Manufacturing, Wool Fiberglass Insulation	40 CFR60 SUBPART PPP	See Applicable Subpart	See Applicable Subpart
Manure Processing Operations	Rule 1127 (08/06/04)	Rule 1127(h)	Rule 1127(g)
Marine Tank Vessel Operations	Rule 1142 (07/19/91)	Rule 1142(e)	Rule 1142(h)
	Rule 1173 (02/06/09) 40 CFR63 SUBPART Y	Rule 1173(j) See Applicable Subpart	Rule 1173(i) See Applicable Subpart
Mercury Emissions	40 CFR61 SUBPART E 40 CFR63 SUBPART IIII	See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart
Motor Vehicle Air Conditioners with Ozone Depleting Substances (ODS): Repair, Service, Manufacturing, Maintenance, or Disposal	40 CFR82 SUBPART B 40 CFR82 SUBPART F	See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart
Municipal Waste Combustors	40 CFR60 SUBPART Cb 40 CFR60 SUBPART Ea 40 CFR60 SUBPART Eb	See Applicable Subpart See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart See Applicable Subpart
Negative Air Machines/HEPA, Asbestos	40 CFR61 SUBPART M	See Applicable Subpart	See Applicable Subpart
Nickel Electroplating Operation	Rule 1426 (05/02/03)		Rule 1426(e)
Nonmetallic Mineral Processing Plants	Rule 404 (02/07/86) Rule 405 (02/07/86) 40 CFR60 SUBPART OOO	AQMD TM 5.1, 5.2, or 5.3 AQMD TM 5.1, 5.2, or 5.3 See Applicable Subpart	See Applicable Subpart
Off-site Waste and Recovery Operation	40 CFR63 SUBPART DD	See Applicable Subpart	See Applicable Subpart

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Section II - Applicable Requirements, To	est Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Oil and Gas Well Operation	Rule 1148 (11/05/82) Rule 1148.1 (03/05/04)	AQMD TM 25.1 Rule 1148.1 (g)	Rule 1148.1 (f)
Onshore Natural Gas Processing, SO2 Emissions	40 CFR60 SUBPART LLL	See Applicable Subpart	See Applicable Subpart
Open Fires	Rule 444 (11/07/08)		
Open Storage, Petroleum Coke	Rule 403 (06/03/05) Rule 403.1 (04/02/04) Rule 1158 (06/11/99)	Rule 403(d)(4)	Rule 403(f) Rule 403.1(h) Rule 1158(j)
Open Storage	Rule 403 (06/03/05) Rule 403.1 (04/02/04)	Rule 403(d)(4)	Rule 403(f) Rule 403.1(h)
Outer Continental Shelf Platform	Rule 1183 (03/12/93) 40 CFR55	40 CFR55 See Applicable Subpart	40 CFR55 See Applicable Subpart
Oven, Commercial Bakery	Rule 1153 (01/13/95)	Rule 1153(h)	Rule 1153(g)
Oven, Petroleum Coke	Rule 477 (04/03/81) 40 CFR63 SUBPART L 40 CFR63 SUBPART CCCCC	AQMD Visible Emissions, AQMD TM 5.1, 5.2, or 5.3 See Applicable Subpart See Applicable Subpart	See Applicable Subpart See Applicable Subpart
Ozone Depleting Substances (ODS) or Alternative ODS, Use	40 CFR82 Subpart G	See Applicable Subpart	See Applicable Subpart

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Section II Applicable Requirements, Te	st Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Petroleum Refineries	Rule 218 (05/14/99)	AQMD TM 100.1	Rule 218(e) & (f)
· · · · · · · · · · · · · · · · · · ·	Rule 465 (08/13/99)		
	Rule 468 (10/08/76)	AQMD TM 6.1 or 6.2	
	Rule 469 (02/13/81)	AQMD TM 6.1 or 6.2	Rule 1118(f), (g), (h), & (i)
	Rule 1118 (11/04/05)	Rule 1118(j)	Rule 1123(c)
	Rule 1123 (12/07/90)	N/A	Rule 1189(e)
1	Rule 1189 (01/21/00)	Rule 1189(f) See Applicable Subpart	See Applicable Subpart
	40 CFR60 SUBPART J	See Applicable Subpart	See Applicable Subpart
·	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART G	i i i i i i i i i i i i i i i i i i i	See Applicable Subpart
	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART CC	See Applicable Subpart	
	40 CFR63 SUBPART EEEE	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART GGGGG	See Applicable Subpart	See Applicable Subpart
-	Title 13 CCR 2250		
Petroleum Refineries, Fugitive Emissions	Rule 1173 (02/06/09)	Rule 1173(j)	Rule 1173(i)
	Rule 466 (10/07/83)	Rule 466(f)	Rule 466(e)
	Rule 466.1 (03/16/84)	Rule 466.1(g)	Rule 466.1(h)
•	Rule 467 (03/05/82)	Rule 467(f)	Rule 467(e)
	40 CFR60 SUBPART GGG	See Applicable Subpart	See Applicable Subpart
•	40 CFR61 SUBPART V	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART G	See Applicable Subpart	See Applicable Subpart
· ·	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart

				
KEY ABBREVIATIONS:	Reg. = AQMD Regulation Rule = AQMD Rule	App. = Appendix AQMD TM = AQMD Test Method	CFR = Code of Federal Regulations CCR = California Code of Regulations	

Section II - Applicable Requirements, Test Methods, & MRR Requirements				
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement	
Petroleum Refineries, Storage Tanks	Rule 463 (05/06/05)	Rule 463(g)	Rule 463(e)(5)	
	Rule 1178 (04/07/06)	Rule 1178(i)	Rule 1178(f) & (h)	
	40 CFR60 SUBPART K	See Applicable Subpart	See Applicable Subpart	
:	40 CFR60 SUBPART Ka	See Applicable Subpart	See Applicable Subpart	
	40 CFR60 SUBPART Kb	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART G	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart	
:	40 CFR63 SUBPART EEEE	See Applicable Subpart	See Applicable Subpart	
Petroleum Refineries, Wastewater Systems	Rule 1176 (09/13/96)	Rule 1176(h)	Rule 1176(f) & (g)	
	Rule 464 (12/07/90)	N/A		
	40 CFR60 SUBPART QQQ	See Applicable Subpart	See Applicable Subpart	
	40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart	
Pharmaceuticals & Cosmetics Manufacturing	Rule 1103 (03/12/99)	Rule 1103(f)	Rule 1103(e)	
	40 CFR63 SUBPART GGG	See Applicable Subpart	See Applicable Subpart	
Polyester Resin Operation	Rule 109 (05/02/03)	Rule 109(g)	Rule 109(c)	
	Rule 1162 (07/08/05)	Rule 1162(f)	Rule 1162(e)	
	Rule 1171 (05/01/09)	Rule 1171(e)	Rule 1171(c)(6)	
Primary Magnesium Refining	40 CFR63 SUBPART TTTTT	See Applicable Subpart	See Applicable Subpart	
Printing Press	See Coating Operations			
Publicly Owned Treatment Works Operations	Rule 1179 (03/06/92)	Rule 1179(e)	Rule 1179(c) & (d)	
	40 CFR60 SUBPART O	See Applicable Subpart	See Applicable Subpart	
Pumps	See Fugitive Emissions or Petroleum Ref	fineries, Fugitive Emissions		

	<u> </u>		<u> </u>	
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Section II - Applicable Requirements, Test Methods, & MRR Requirements					
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement		
Recycling & Recovery Equipment for Ozone Depleting Substances (ODS),	40 CFR82 SUBPART F	See Applicable Subpart	See Applicable Subpart		
Refrigerant Reclaimers for Ozone Depleting Substances (ODS)	40 CFR82 SUBPART F	See Applicable Subpart	See Applicable Subpart		
Rendering Plant	Rule 472 (05/07/76)	N/A	Rule 472(b)		
Rock Crushing	See Nonmetallic Mineral Processing Plants				
Secondary Aluminum Production	40 CFR63 SUBPART LL	See Applicable Subpart	See Applicable Subpart		
Semiconductor Manufacturing	See Manufacturing, Semiconductors				
Sewage Treatment Plants	See Publicly Owned Treatment Works Operation				
Site Remediation	40 CFR63 SUBPART GGGGG	See Applicable Subpart	See Applicable Subpart		
Smelting, Primary Copper	40 CFR63 SUBPART QQQ	See Applicable Subpart	See Applicable Subpart		
Smelting, Secondary Lead	40 CFR60 SUBPART L	See Applicable Subpart	See Applicable Subpart		
	40 CFR63 SUBPART X	See Applicable Subpart	See Applicable Subpart		
Soil Decontamination / Excavation	Rule 1166 (05/11/01)	Rule 1166(e)	Rule 1166(c)(1)(C)		
	40 CFR63 SUBPART GGGGG	See Applicable Subpart	See Applicable Subpart		
Spray Booth	See Coating Operations				
Sterilizer, Ethylene Oxide	40 CFR63 SUBPART O	See Applicable Subpart	See Applicable Subpart		
Storage Tank, Degassing Operation	Rule 1149 (07/14/95) 40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart		

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Section II - Applicable Requirements, Te	st Methods, & MRR Requirements		
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement
Storage Tank, Greater Than 19,815 Gallon	Rule 463 (05/06/05)	Rule 463(g)	Rule 463(e)(5)
Capacity	Rule 1178 (04/07/06)	Rule 1178(i)	Rule 1178(h)
	40 CFR63 SUBPART F	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART G	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART H	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART I	See Applicable Subpart	See Applicable Subpart
	40 CFR60 SUBPART K	See Applicable Subpart	See Applicable Subpart
	40 CFR60 SUBPART Ka	See Applicable Subpart	See Applicable Subpart
	40 CFR60 SUBPART Kb	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART R	See Applicable Subpart	See Applicable Subpart
	40CFR63 SUBPART BBBBBB	See Applicable Subpart	See Applicable Subpart
	40 CFR63 SUBPART CC	See Applicable Subpart	See Applicable Subpart
Synthetic Fiber Production Facilities	40 CFR60 SUBPART HHH	See Applicable Subpart	See Applicable Subpart
Taconite Iron Ore Processing Facilities	40 CFR63 SUBPART RRRRR	See Applicable Subpart	See Applicable Subpart
✓ Turbine, Stationary Gas-Fired	Rule 1134 (08/08/97)	Rule 1134(e) & (g)	Rule 1134(d) & (f)
	✓ Rule 475 (08/07/78)	✓ AQMD TM 5.1, 5.2, or 5.3	Con Annillandala Colombia
	40 CFR60 SUBPART GG	See Applicable Subpart	See Applicable Subpart
	✓ 40 CFR60 SUBPART KKKK	See Applicable Subpart	See Applicable Subpart
	☐ 40 CFR63 SUBPART YYYY	See Applicable Subpart	See Applicable Subpart
Turbine, Stationary Oil-Fired	40 CFR63 SUBPART YYYY	See Applicable Subpart	See Applicable Subpart
Valves	See Fugitive Emissions or Petroleum Refineries,	Fugitive Emissions	
Vessel, Refinery Process Rule 1123 (12/07/90)		N/A Rule 1123(c)	
Vessels	See Petroleum Refineries, Fugitive Emissions		

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Section II - Applicable Requirements, Test Methods, & MRR Requirements							
Equipment/Process	Applicable Requirement	Test Method	MRR Requirement				
Wastewater, Chemical Plant	Rule 464 (12/07/90) Rule 1176 (09/13/96) 40 CFR63 SUBPART F 40 CFR63 SUBPART G 40 CFR63 SUBPART H 40 CFR63 SUBPART I 40 CFR63 SUBPART CC	N/A Rule 1176(h) See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart See Applicable Subpart	Rule 1176(f) & (g) See Applicable Subpart				
Wastewater Treatment, Other	Rule 464 (12/07/90) Rule 1176 (09/13/96)	N/A Rule 1176(h)	Rule 1176(f) & (g)				
Woodworking Operations	Rule 1137 (02/01/02)	N/A	Rule 1137(e)				

KEY ABBREVIATIONS: Reg

Reg. = AQMD Regulation Rule = AQMD Rule App. = Appendix
AQMD TM = AQMD Test Method

CFR = Code of Federal Regulations CCR = California Code of Regulations

Section III - Supplemental Identification of Specific Requirements

Complete this section only if there is a specific requirement (i.e., rule reference, test method, or MRR requirement) that is:

- 1. Listed for a specific type of equipment or process in Section II of this form & DOES NOT pertain to a specific device at your facility*; OR,
 - 2. Is NOT Listed for a specific type of equipment or process in Section II of this form but it IS applicable to a specific device at your facility.

NOTES:

- 1. For any specific requirement, test method, or MRR requirement that is identified as "Remove," attach additional sheets to explain the reasons why the specific requirement does not pertain to the device listed.
- 2. All boxes that are checked in Section II and any additional requirements identified in this section as "Add" will be used to determine the facility's compliance status. This information will be used to verify the certification statements made on Form 500-A2.
- 3. Do not use this section to identify equipment that is exempt from specific rule requirements. Your equipment is automatically considered to be in compliance with the rule that specifically exempts the equipment from those requirements.
- 4. Listing any requirement that does not apply to a specific piece of equipment in this section will not provide the facility with a permit shield unless one is specifically requested by completing Form 500-D and approved by the AQMD.
- * If this section is completed as part of the initial Title V application & there is no device number assigned, refer to the existing permit or application number in this column.

Device No.*	Specific Requirement (Rule Number & Date)	Add (A) or Remove (R) (Check one)	Test Method	Add (A) or Remove (R) (Check one)	MRR Requirement	Add (A) or Remove (R) (Check one)
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		OAOR		OAOR		OAOR

Check oπ each SIP-Approved I		e facility. Use the bia	inks at the end of this form to fill	1	
SIP - Approved Rule	Adoption/ Amendment Date	Check (✔) If Applies	SIP - Approved Rule	Adoption/ Amendment Date	Check (√) If Applies
401	03/02/84	✓			
431.2	05/04/90	√			
1 61	6/3/05				
1 66.1	05/02/80				
169	04/07/76				
475	10/08/76	√			
1112	01/06/84				
1112.1	2/7/86				
1113	11/08/96	V			
1117	1/6/83				
1122	07/11/97				
1132	03/05/04		-		
1140	02/01/80				
1146	11/17/00				
1146.1	5/13/94				
1151	12/11/98				
1158	6/11/99				
1162	11/17/00				
1166	07/14/95				
1171	11/07/03	<u> </u>			
1175	05/13/94				
1186	09/10/99				

Section V - AQMD Rules That	与图式的影响的 医自动性 化氯化物 医克拉克氏征	<u> </u>	the end of this form to fill-in new ite	ome	
Non SIP - Approved Rule	Adoption/ Amendment Date	Check ()</th <th>Non SIP - Approved Rule</th> <th>Adoption/ Amendment Date</th> <th>Check (∕∕) If Applies</th>	Non SIP - Approved Rule	Adoption/ Amendment Date	Check (∕∕) If Applies
53 Los Angeles Co.	N/A		1192	06/16/00	
53 Orange Co.	N/A		1193	07/09/10	
53 Riverside Co.	N/A		1194	10/20/00	
53 San Bernardino Co.	N/A		1195	05/05/06	
53A San Bernardino Co.	N/A		1196	06/06/08	
402	05/07/76		1401	09/10/10	<u></u>
429	12/21/90		1401.1	11/04/05	
430	07/12/96	<u> </u>	1402	03/04/05	
441	05/07/76		1403	10/05/07	
473	05/07/76		1404	04/06/90	
477	04/03/81		1405	01/04/91	
480	10/07/77		1406	07/08/94	
1109	08/05/88		1407	07/08/94	
1110.2	07/09/10	<u> </u>	1411	03/01/91	
1116.1	10/20/78		1414	05/03/91	
1127	08/06/04		1415	10/14/94	
1143	07/09/10		1418	09/10/99	
1147	12/05/08		1420	09/11/92	
1148.1	03/05/04		1420.1	11/05/10	
1150	10/15/82		1421	12/06/02	
1155	12/04/09		1425	03/16/01	
1156	03/06/09		1426	05/02/03	
1157	09/08/06				
1163	06/07/85				
1170	05/06/88				
1183	03/12/93				
1186.1	01/09/09				
1191	06/16/00				

Check off each AQMD Rule as it applies to the facility. Use the blanks at the end of this form to fill-in new items.							
Non SIP - Approved Rule	Adoption/ Amendment Date	Check (✔) If Applies	Non SIP - Approved Rule	Adoption/ Amendment Date	Check (✔) If Applies		
1469	12/05/08		2009.1	05/11/01			
1469.1	03/04/05		2501	05/09/97			
1470	06/01/07	√	2506	12/10/99			
1472	03/07/08						
2009	01/07/05						
	-						

South Coast Air Quality Management District Form 500-F1 (Title V) Title IV - Acid Rain Phas South Coast

Title IV - Acid Rain Phase II Facility Information Summary

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

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

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 -	Gen	eral Information								
		Business Name of Operator That gy Center, LLC	at Appears On Per	mit):				AQMD Facility By AQMD):		able On Permit Or Invoice
Contino	Liter	gy contor, 220						-		
							3. ORIS	Code (5-Digit):_	57482	
4. This is an	appli	cation for a (Check all that	apply to the facili	ity):						
a.	Ø	Phase II Acid Rain Permit of (Complete Section II of this		b.			ering Extens lete Form 50	sion Plan or Re 00-F2)	vision	
C.		New Unit Exemption or Rev (Complete Form 500-F3)	vision	d.			I Unit Exemplete Form 50	otion or Revision 00-F4)	n	
5. The reque	sted	permit action involves a(n)	(Check one):							
a.	0	Administrative Permit Revis	sion	b.	0	Signific	ant Permit F	Revision		
C,	0	Fast Track Permit Revision		d.	0	Autom	atic Permit F	Revision		
e.	•	Other (specify): Increase	Annual Start-	-ups and	Add	Black	start (All I	Eight Units)		
		use II Acid Rain Device S	ummary a. C Ne	2W	h C	Revis	ed			(1-4)
1. The follow	ving ii	Tromation is (Check one).	a. 0 110	J VV	D	TACVIS	Cu		-	For devices starting
AQMD De	evice	# EPA Unit #	Will device Repowe Extension	ring	O	eratio	e started ns on or /15/90?	Device Ope Start Da (mo/day	ate	up after 11/15/90, provide date when Monitoring Certification will begin (mo/day/yr)
			O Yes	○ No	0	Yes	O No			
			O Yes	O No	0	Yes	C No			
			O Yes	O No	0	Yes	○ No			
			O Yes	O No	0	Yes	O No			
			O Yes	O No	0	Yes	C No			

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

Section I - General Information

1. 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.

- 2. 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.
- 3. 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).
- **4.** 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

1. 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 only 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 only 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.



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

Section I - Operator Information					
1. Facility Name (Business Name of Operator That Appears On Perm					
Sentinel Energy Center, LLC	Issued By AQMD): 152707				
 3. This Certification is submitted with a (Check one): b. Supplement/Correction c. MACT Part 1 4. Is Form 500-C2 included with this Certification? 	to a Title V Application				
Section II - Responsible Official Certification Statement					
Read each statement carefully and check each that applies - You	ı must check 3a or 3b.				
1. For Initial, Permit Renewal, and Administrative Application	Certifications:				
 The facility, including equipment that are exempt fron compliance with all applicable requirement(s) identifies 	written permit per Rule 219, is currently operating and will continue to operate in d in Section II and Section III of Form 500-C1,				
 i. <u>except</u> for those requirements that do not sp "Remove" on Section III of Form 500-C1. 	ecifically pertain to such devices or equipment and that have been identified as				
ii. <u>except</u> for those devices or equipment that h operating in compliance with the specified ap	ave been identified on the completed and attached Form 500-C2 that will \underline{not} be plicable requirement(s).				
 b. O The facility, including equipment that are exempt frequirements with future effective dates. 	rom written permit per Rule 219, will meet in a timely manner, all applicable				
2. For Permit Revision Application Certifications:					
 a. The equipment or devices to which this permit revidentified in Section II and Section III of Form 500-C1 	rision applies, will in a timely manner comply with all applicable requirements				
3. For MACT Hammer Certifications:					
	Air Act (Subpart B of 40 CFR part 63), also known as the MACT "hammer." The ation to comply with the Part 1 requirements of Section 112(j).				
b. The facility is not subject to Section 112(j) of the Clea	n 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 reasonable inquiry, the statement and information in this document and in a	as defined in AQMD Regulation XXX and that based on information and belief formed after II attached application forms and other materials are true, accurate, and complete.				
1. Signature of Responsible Official:	2. Title of Responsible Official:				
Mar	Plant Manager				
3. Print Name: 4. Date:					
Dennis Johnson	214122				
5. Phone #:	6. Fax #:				
(760) 288-7901					
7. Address of Responsible Official:	1				
15775 Melissa Lane Rd.	North Palm Springs CA 92258				
Street #	City State Zip				

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 Stateme	nt
affected units for which the submission is made. I certify und statements and information submitted in this document and a responsibility for obtaining the information, I certify that the s	bmission on behalf of the owners and operators of the affected source or er penalty of law that I have personally examined, and am familiar with, the II its attachments. Based on my inquiry of those individuals with primary tatements and information are to the best of my knowledge and belief true, penalties for submitting false statements and information or omitting of fine or imprisonment.
Signature of Designated Representative or Alternate:	2. Title of Designated Representative or Alternate:
Mura	Plant Manager
3. Print Name of Designated Representative or Alternate:	4. Date:
Dennis Johnson	2/4/22
5. Phone #:	6. Fax #:
(760) 288-7901	
7. Address of Designated Representative or Alternate:	
15775 Melissa Lane	North Palm Springs CA 92258
Street #	City State Zip

Applications for Modification: Increase Turbine Annual Startups and Add Black Start Capability Sentinel Energy Center, LLC

APPENDIX B – MANUFACTURER SPECIFICATIONS

Sentinel Black Start Project

Design Overview

Item	Description
Megapack Island	Consists of 12 Tesla Megapacks, each 2 MW/4MWh. Megapacks selected because of ability to "stand" alone without additional maintenance and upkeep. Includes civil, electrical and control systems.
Megapack Connection	Scope needed to connect Megapacks to 5 kV bus along with modifications to 5 kV bus. Due to Sentinel's advanced design, much of the work on Sentinel's existing distribution system is software and programming logic related related.
Other Facilities Improvements	Fencing and any other physical site improvements not included in other categories.
Security & Compliance	Entry, badging, perimeter alarms, security cameras, IT Audit/Complance costs, modifications to perimeter of control room.
Permitting & Approvals	 CEC AFC Amendment Process MMA for existing interconnection since new source of generation on site, even though it's non-exporting FERC SCAQMD Local to the extent not already included in contractor scope
Soft Costs	Bid Preparation, Engineering & Design (Sentinel), Legal support, Commercial Management, Construction insurance
Financing Costs	Interest during construction, assumed loan origination fees, debt service reserve funding.



Big Picture

To 5 kV system

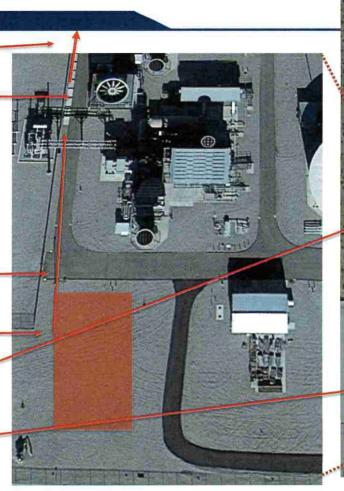
Existing 5kV Trenwa -

Connection to 5 kV system

Megapacks

Control Room Mods

Entry System





Tesla Megapack

Product Information



Model	2 XL
Capacity (MW)	1.946
Energy (MWh)	3.893
Size	W x D x H 30' x 5.4' x 8.3'
Weight	84,000 lbs
RTE	90%
HVAC/Fire	Internal environmental and fire control
Megapacks at Site	12 23.35 MW 46.70 MWh

Applications for Modification: Increase Turbine Annual Startups and Add Black Start Capability Sentinel Energy Center, LLC

APPENDIX C – NOx, CO, AND VOC EMISSION CALCULATIONS



Facility: Sentinel Energy Center, LLC

Facility ID: 152707

Sentinel Energy Center, LLC

Application to Increase Turbine Annual Startups and Add Black Start Capability

Appendix C Annual NOx Emission Calculations

Table C.1 - Start-up Emissions (per Turbine)

Pre-/Post-	Count [A]	Minutes per SU ¹ (min) [B]	Total Hours in SU ² (hr/yr) [C]	NOx Emissions ³ (lb/hr) [D]	NOx Emissions ⁴ (lb/yr) [E]
Pre-	300	25	125.00	59.76	7,470.00
Post-	410	25	170.83	59.76	10,209.00

¹ Duration from A/N 472140 ² [C] = [A] x [B] / 60

³ Emissions from A/N 472140

4 [E] = [C] x [D]

Table C.3 - Normal Operations Emissions (per Turbine)

Pre-/Post-	Total Hours of Operation¹ (hr/yr) [K]	Total Hours in NO ² (hr/yr) [L]	NOx Emissions ³ (lb/hr) [M]	NOx Emissions ⁴ (lb/yr) [N]
Pre-	2,803	2,628.00	7.92	20,813.76
Post-	2,440	2,201.18	7.92	17,433.32

¹ Total hours of operation from A/N 472140

² [L] = [K] - [C] - [H]

3 Emissions from A/N 472140

4 [N] = [L] x [M]

Table C.5 - Total SU Emiss (lb/1-hr event); Condition A433.1

Minutes in SU ¹ (min) [B]	SU Emissions (lb/hr) [D]	Minutes in NO ² (min) [P]	NO Emissions (lb/hr) [M]	A433.1 ³ (lb/hr) [Q]
5	59.76	35	7.92	29.52

From Table C1

 $^{2}[P] = 60 - [B]$

 3 [Q] = [B] $/60 \times$ [D] + [P] $/60 \times$ [M]

NO = Normal Operations ; SU = Start-up ; SD = Shutdown

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Table C.2 - Shutdown Emissions (per Turbine)

Pre-/Post-	Count [F]	Minutes per SD ¹ (min) [G]	Total Hours in SD ² (hr/yr) [H]	NOx Emissions ³ (lb/hr) [l]	NOx Emissions ⁴ (lb/yr) [J]
Pre-	300	10	50.00	34.95	1,747.50
Post-	410	10	68.33	34.95	2,388.25
	Duration from A/N 4	72140			

2 [H] = [F] x [G] / 60

³ Emissions from A/N 472140

Emissions from A/N 4721
[J] = [H] x [I]

Table C.4 - Total Emissions (per Turbine)

Pre-/Post-	SU (lb/yr) [E]	SD (lb/yr) [J]	NO (lb/yr) [N]	Total [†] (lb/yr) [O]
Pre-	7,470.00	1,747.50	20,813.76	30,031
Post-	10,209.00	2,388.25	17,433.32	30,031
	$^{1}[O] = [E] + [J] + [N]$			111

Change (lb/yr) 0

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Application to Increase Turbine Annual Startups and Add Black Start Capability

Appendix C

Annual CO Emission Calculations

Table C.6 - Start-up Emissions (per Turbine)

Pre-/Post-	Count [A]	Minutes per SU ¹ (min) [B]	Total Hours in SU ² (hr/yr) [C]	CO Emissions ³ (lb/hr) [D]	CO Emissions ⁴ (lb/yr) [E]
Pre-	300	25	125.00	38.15	4,768.75
Post-	410	25	170.83	38.15	6.517.29

Duration from A/N 472140

 2 [C] = [A] x [B] / 60

3 Emissions from A/N 472140

 $^{4}[E] = [C] \times [D]$

Table C.8 - Normal Operations Emissions (per Turbine)

Pre-/Post-	Total Hours of Operation ¹ (hr/yr) [K]	Total Hours in NO ² (hr/yr) [L]	CO Emissions ³ (lb/hr) [M]	CO Emissions ⁴ (lb/yr) [N]
Pre-	2,803	2,628.00	7.72	20,288.16
Post-	2,440	2,201.18	7.72	16,993.09

1 Total hours of operation from A/N 472140

 2 [L] = [K] - [C] - [H]

3 Emissions from A/N 472140

 4 [N] = [L] x [M]

NO = Normal Operations ; SU = Start-up ; SD = Shutdown

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Table C.7 - Shutdown Emissions (per Turbine)

Pre-/Post-	Count [F]	Minutes per SD ¹ (min) [G]	Total Hours in SD ² (hr/yr) [H]	CO Emissions ³ (lb/hr) [l]	CO Emissions ⁴ (lb/yr) [J]
Pre-	300	10	50.00	203.88	10,194.00
Post-	410	10	68.33	171.82	11,740.75

Duration from A/N 472140 2 [H] = [F] x [G] / 60

³ Emissions from A/N 472140

 $^{4}[J] = [H] \times [I]$

Table C.9 - Total Emissions (per Turbine)

Pre-/Post-	SU (lb/yr) [E]	SD (lb/yr) [J]	NO (lb/yr) [N]	Total ¹ (lb/yr) [O]
Pre-	4,768.75	10,194:00	20,288.16	35,251
Post-	6,517.29	11,740.75	16,993,09	35,251
	1 (O) = (E) + (I) + (N)		-	-111

[O] = [E] + [J] + [N]

Change (lb/yr) 0

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Facility: Sentinel Energy Center, LLC

Facility ID: 152707

Sentinel Energy Center, LLC

Application to Increase Turbine Annual Startups and Add Black Start Capability

Appendix C Annual VOC Emission Calculations

Table C.10 - Start-up Emissions (per Turbine)

Pre-/Post-	Count [A]	Minutes per SU ¹ (min) [B]	Total Hours in SU ² (hr/yr) [C]	VOC Emissions ³ (lb/hr) [D]	VOC Emissions ⁴ (lb/yr) [E]
Pre-	300	25	125.00	10.32	1,290.00
Post-	410	25	170.83	10.32	1,763.00
	Duration from A/N 4	72140	1-2		

2 [C] = [A] x [B] / 60

³ Emissions from A/N 472140

 $^{4}[E] = [C] \times [D]$

Table C.12 - Normal Operations Emissions (per Turbine)

Pre-/Post-	Total Hours of Operation ¹ (hr/yr) [K]	Total Hours in NO ² (hr/yr) [L]	VOC Emissions ³ (lb/hr) [M]	VOC Emissions ⁴ (lb/yr) [N]
Pre-	2,803	2,628.00	2:21	5,807.88
Post-	2,440	2,201.18	2.21	4,864.60

¹ Total hours of operation from A/N 472140

 2 [L] = [K] - [C] - [H]

3 Emissions from A/N 472140

4 [N] = [L] x [M]

NO = Normal Operations ; SU = Start-up ; SD = Shutdown

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Table C.11 - Shutdown Emissions (per Turbine)

Pre-/Post-	Count [F]	Minutes per SD ¹ (min) [G]	Total Hours in SD ² (hr/yr) [H]	VOC Emissions ³ (lb/hr) [l]	VOC Emissions ⁴ (lb/yr) [J]
Pre-	300	10	50.00	17.48	874,00
Post-	410	10	68.33	17.48	1,194.47

Duration from A/N 472140

 2 [H] = [F] x [G] / 60

3 Emissions from A/N 472140

 $^{4}[J] = [H] \times [I]$

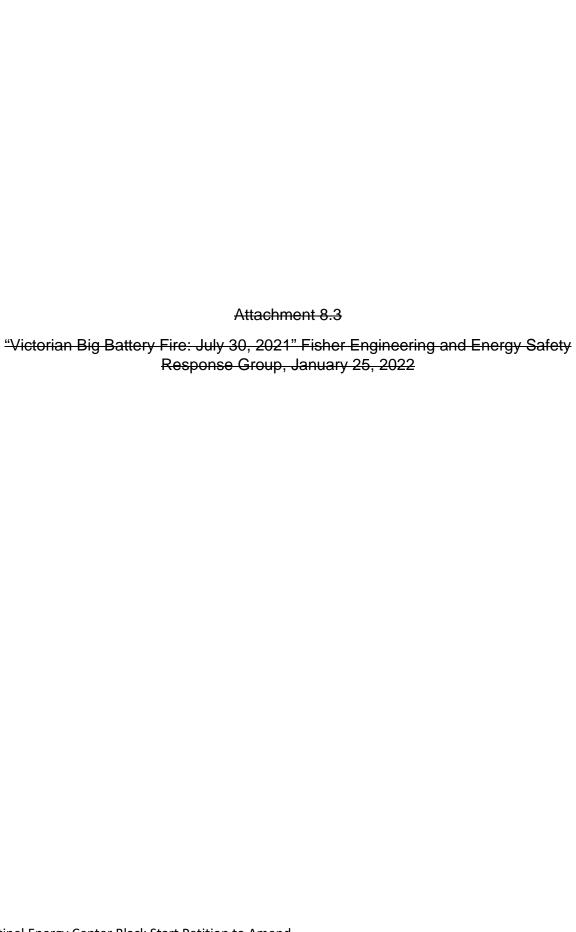
Table C.13 - Total Emissions (per Turbine)

Pre-/Post-	SU (lb/yr) [E]	SD (lb/yr) [J]	NO (lb/yr) [N]	Total ¹ (lb/yr) [O]
Pre-	1,290.00	874.00	5,807.88	7,972
Post-	1,763.00	1,194.47	4,864.60	7,822
	1 (O) = (F) + (I) + (N)	-	-	111

[O] = [E] + [J] + [N]

Change (lb/yr) -150

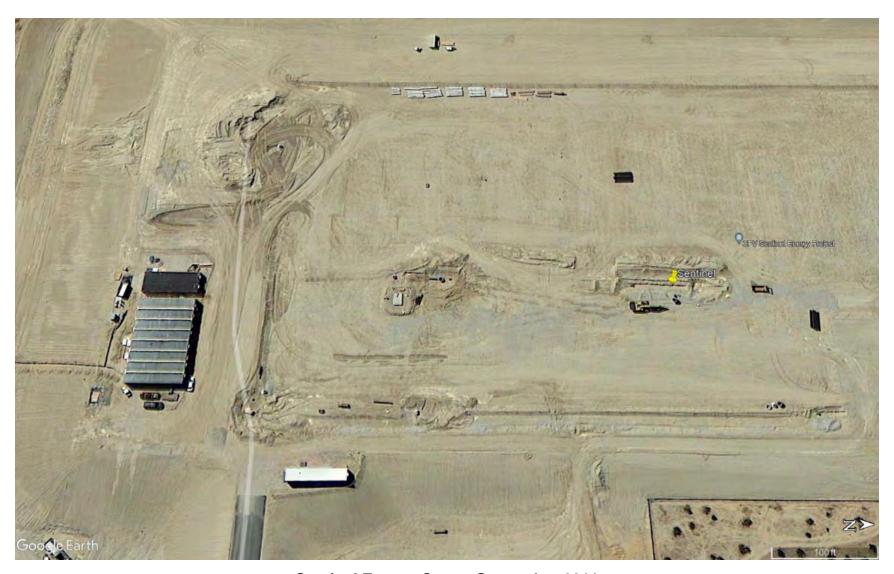
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Attachment 8.4 Original Construction Ground Disturbance Photographs



Sentinel Energy Center June 2011



Sentinel Energy Center September 2011



Sentinel Energy Center June 2012

Attachment 8.5
Property Owner Map

