DOCKETED	
Docket Number:	06-AFC-10C
Project Title:	Midway Peaking Project - Starwood Power-Midway LLC
TN #:	259780
Document Title:	Quarterly Operation Report – 3rd Qtr 2024
Description:	Quarterly Operation Report – 3rd Qtr. 2024
Filer:	Anwar Ali
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/30/2024 1:52:29 PM
Docketed Date:	10/30/2024

Midway Peaking, LLC

4350 Executive Drive, Ste. 320
San Diego, CA 92122
619-756-5795

October 29, 2024

Anwar Ali
Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
(916) 654-4611

Subject: **CEC Quarterly Operation Report – 3rd Qtr. 2024**
06-AFC-10
Midway Peaking, LLC

Dear Mr. Ali.

Pursuant to Condition of Certification AQ-SC10 of Commission Decision, Docket No. 06-AFC-10, Midway Peaking, LLC hereby submits the *Quarterly Operation Report* for the third quarter 2024 reporting period.

The conditions referenced herein have been updated to coincide with the CEC Final order approved on March 14, 2012, Docket No.06-AFC-10C.

Midway Peaking, LLC is committed to the safe and environmentally responsible operation of this facility. Should you have any questions please contact Tony Gilmore, Compliance Manager, at (619) 756-5795.

Sincerely,

Claude Couvillion
Senior Vice President of Operations and Development
Middle River Power, LLC

Enclosure

DISTRIBUTION LIST

- Kathy Hurst, Director of EHS, Middle River Power (e copy)
- Ramiro Gonzalez, Plant Manager, Midway Peaking, LLC. (e copy)
- Taylor Leach, Environmental Specialist, NAES (e copy)

Midway Peaking, LLC
CEC Quarterly Operation Report Summary
Quarter 3 - 2024

Condition	Description of Action	Status / Comments
AQ-7	Submit proof that necessary Title IV SO2 emission allotments have been acquired as necessary for compliance with Title IV requirements annually in the first Quarterly Compliance Report (AQ-SC10) that is due after the annual SO2 allotment due date.	The project was in compliance with the holding/surrendering of Title IV SO2 allotments. The Acid Rain (Title IV) SO2 Annual Reconciliation/Allowance Transfer is due by Mar 1st each year. This information is included in **Attachment 7**.
AQ-25	All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere.	The project was in compliance with this requirement,
AQ-26	No air contaminant shall be released into the atmosphere which causes a public nuisance. The project owner will document any complaints that it has received from the public in the Quarterly Operation Report (AQ-SC10).	The project was in compliance with this requirement. No complaints were received from the public during this reporting period.
AQ-27	No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. The project owner shall document any known opacity violations in the Quarterly Operation Report (AQ-SC10).	The project was in compliance with this requirement. No known opacity violations occurred during the reporting period.
AQ-30	The CTGs shall be fired exclusively on PUC-regulated natural gas with a sulfur content of no greater than 1.0 grain of sulfur compounds (as S) per 100 dry scf of natural gas. The project owner shall compile the required data on the sulfur content of the natural gas and submit the information to the CPM and the APCO in the Quarterly Operation Report (AQ-SC10).	The project was in compliance with this requirement. The CTGs are supplied with PUC-regulated natural gas with less than 1.0 gr/100 dscf in accordance with PG&E Gas Rule No. 21. Included in **Attachment 1** is data published by PG&E to demonstrate the natural gas sulfur content is consistently less than the standard.
AQ-31	Emission rates from each CTG, except during startup and shutdown periods, shall not exceed any of the following limits: NOx (as NO2) – 2.8 lb/hr and 2.5 ppmvd @ 15% O2; CO – 4.19 lb/hr and 6.0 ppmvd @ 15% O2; VOC (as methane) – 0.82 lb/hr and 2.0 ppmvd @ 15% O2; PM10 – 1.85 lb/hr; or SOx (as SO2) – 0.89 lb/hr. The project owner shall submit to the CPM and APCO CTG emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	CEMS are used to demonstrate compliance with NOx and CO; all emissions were within permitted emission limits unless specifically noted in **Attachment 2**, which includes a copy of the Quarterly CEMS Excess Emission and Downtime Summary report submitted to the APCO for the reporting period. Source tests are conducted every 12 or 24 months to demonstrate compliance with PM10 and VOC and the source test reports are submitted to the CMP and APCO within 60-days of completing the test; refer to AQ-50 for more information. Ongoing monitoring for SOx is not required by the permit.
AQ-32	Combined emission rates except during startup and shutdown periods, shall not exceed any of the following Swift Pac two turbine limits: NOx (as NO2) – 5.6 lb/hr and 2.5 ppmvd @ 15% O2; CO – 8.38 lb/hr and 6.0 ppmvd @ 15% O2; VOC (as methane) – 1.64 lb/hr and 2.0 ppmvd @ 15% O2; PM10 – 3.70 lb/hr; or SOx (as SO2) – 1.78 lb/hr. The project owner shall submit to the CPM and APCO CTG emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	CEMS are used to demonstrate compliance with NOx and CO; all emissions were within permitted emission limits unless specifically noted in **Attachment 2**, which includes a copy of the Quarterly CEMS Excess Emission and Downtime Summary report submitted to the APCO for the reporting period. Source tests are conducted every 12 or 24 months to demonstrate compliance with PM10 and VOC and the source test reports are submitted to the CMP and APCO within 60-days of completing the test; refer to AQ-50 for more information. Ongoing monitoring for SOx is not required by the permit.
AQ-33	The ammonia (NH3) emissions shall not exceed either of the following limits: 4.24 lb/hr or 10 ppmvd @ 15% O2 over a 24 hour rolling average. The project owner shall submit to the CPM and APCO CTG emissions data demonstrating compliance with this condition, using approved calculation methods (AQ-47), as part of the Quarterly Operation Report (AQ-SC10).	Ammonia emissions are estimated hourly using a calculation involving inlet and outlet NOx and O2 CEMS measurements. Included in **Attachment 3** is an excess emission report from the CEMS data acquisition and monitoring system (DAHS) to demonstrate that the emission limits were not exceeded during the compliance period.
AQ-34	During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NOx (as NO2) – 30 lb/hr; CO – 12.5 lb/hr; VOC (as methane) – 0.83 lb/hr; PM10 – 1.85 lb/hr; or SOx (as SO2) – 0.89 lb/hr. All averages on a per event basis. The project owner shall submit to the CPM and APCO CEM-derived emissions data for NOx and CO (except when source testing is required for startups) and shall provide calculated PM10 and VOC emission from fuel consumption data and source test results to demonstrate compliance with this condition as part of the Quarterly Operation Report (AQ-SC10)	Included in **Attachment 3** are excess emission reports from the CEMS DAHS to demonstrate that the emission limits were not exceeded during the compliance period.

Condition	Description of Action	Status / Comments
AQ-35	During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NOx (as NO2) – 1.50 lb/hr; CO – 21.33 lb/hr; VOC (as methane) – 0.83 lb/hr; PM10 – 1.85 lb/hr; or SOx (as SO2) – 0.89 lb/hr. All averages on a per event basis. The project owner shall submit to the CPM and APCO CEM-derived emissions data for NOx and CO (except when source testing is required for shutdowns) and shall provide calculated PM10 and VOC emission from fuel consumption data and source test results to demonstrate compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 3** are excess emission reports from the CEMS DAHS to demonstrate that the emission limits were not exceeded during the compliance period. 7/3/2024 NOx shutdown exceedance occurred due to equipment breakdown. Detailed in breakdown report included in **Attachment 2**
AQ-36	Startup shall be defined as the period of time during which a unit is brought from a shutdown status to its SCR operating temperature and pressure, including the time required by the unit's emission control system to reach full operations. Shutdown shall be defined as the period of time during which a unit is taken from an operational to a non-operational status as the fuel supply to the unit is completely turned off. The project owner shall submit to the CPM and APCO the CTG startup and shutdown event duration data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	The CEMS DAHS monitors unit parameters and is programmed to recognize and record the duration of offline, startup, shutdown and normal operating conditions. The CEMS DAHS is programmed to prevent more than 120 minutes of data being flagged as startup or shutdown.
AQ-37	The duration of each startup or shut down time shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. The project owner shall submit to the CPM and APCO the CTG startup and shutdown event duration data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	The CEMS DAHS monitors unit parameters and is programmed to recognize and record the duration of offline, startup, shutdown and normal operating conditions. The CEMS DAHS is programmed to prevent more than 120 minutes of data being flagged as startup or shutdown. Included inn **Attachment 6**
AQ-38	The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. The project owner shall submit to the CPM and APCO the CTG startup and shutdown emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 3** are excess emission reports from the CEMS DAHS to demonstrate that the startup and shutdown emission limits were not exceeded during the compliance period. 7/3/2024 NOx shutdown exceedance occurred due to equipment breakdown. Detailed in breakdown report included in **Attachment 2**
AQ-39	Daily emissions from the CTG shall not exceed any of the following limits: NOx (as NO2) – 79.8 lb/day; CO – 117.6 lb/day; VOC – 19.7 lb/day; PM10 – 44.4 lb/day; or SOx (as SO2) – 21.4 lb/day. The project owner shall submit to the CPM and APCO CTG emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 3** are excess emission reports from the CEMS DAHS to demonstrate that the daily emission limits were not exceeded during the compliance period.
AQ-40	Combined daily emissions from the two Swift Pac unit CTG's operating under permit units C-7286-1 and C-7286-2, and the two Swift Pac unit CTG's operating under permit units C-7286-3 and C-7286 shall not exceed any of the following Swift Pac two turbine limits: NOx (as NO2) – 159.6 lb/day; CO – 235.2 lb/day; VOC – 39.4 lb/day; PM10 – 88.8 lb/day; or SOx (as SO2) – 42.8 lb/day. The project owner shall submit to the CPM and APCO CTG emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 3** are excess emission reports from the CEMS DAHS to demonstrate that the daily emission limits were not exceeded during the compliance period.
AQ-41	Quarterly hours of operation of each CTG shall not exceed any of the following limits: 1st Quarter—800 hours, 2nd Quarter—800 hours, 3rd Quarter—1,400 hours, or 4th Quarter—1,000 hours. The project owner shall submit to the CPM and APCO CTG operations data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 4** is a summary of operating time for each unit that demonstrates all CTGs operated less than the allowable limit during the reporting period.
AQ-42	Annual emissions from each CTG, calculated on a twelve month rolling basis, shall not exceed any of the following limits: NOx (as NO2) – 12,736 lb/year; CO – 18,826 lb/year; VOC – 3,281 lb/year; PM10 – 7,400 lb/year; or SOx (as SO2) – 3,560 lb/year. The project owner shall submit to the CPM and APCO CTG emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 5** is a summary of monthly emissions from each turbine over the latest twelve months.
AQ-43	Combined annual emissions from the two Swift Pac unit CTG's operating under permit units C-7286-1 and C-7286-2, and the two Swift Pac unit CTG's operating under permit units C-7286-3 and C-7286 calculated on a twelve consecutive month rolling basis, shall not exceed any of the following Swift Pac two turbine limits: NOx (as NO2) – 25,742 lb/year; CO – 37,652 lb/year; VOC – 6,562 lb/year; PM10 – 14,800 lb/year; or SOx (as SO2) – 7,120 lb/year. The project owner shall submit to the CPM and APCO CTG emissions data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 5** is a summary of monthly emissions from each turbine over the latest twelve months.
AQ-44	Combined annual NOX from CTG's operating under permits C-7286-1, -2, -3, and -4 shall not exceed 50,000 lb/year. The project owner shall compile required emission compliance data using these standards and shall submit the information to the CPM and the APCO as part of the Quarterly Operation Report (AQ-SC10).	Included in **Attachment 5** is a summary of monthly emissions from each turbine over the latest twelve months.

Condition	Description of Action	Status / Comments
AQ-46	Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months.	The CEMS DAHS is programmed to record and report emissions data in accordance with these averaging periods.
AQ-52	The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract ....The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the CPM and the APCO in the Quarterly Operation Report (AQ-SC10).	The CTGs are supplied with PUC-regulated natural gas with less than 1.0 gr/100 dscf in accordance with PG&E Gas Rule No. 21 (tariff sheet). Included in **Attachment 1** is data published by PG&E to meet this requirement.
AQ-54	Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. The fuel sulfur content data shall be submitted to the CPM and the APCO in the Quarterly Operation Report (AQ-SC10).	The CTGs are supplied with PUC-regulated natural gas with less than 1.0 gr/100 dscf in accordance with PG&E Gas Rule No. 21 (tariff sheet). Included in **Attachment 1** is data published by PG&E to meet this requirement.
AQ-59	The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. The project owner shall submit to the CPM and APCO CEMS audits demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	The CEMS is designed and programmed to sample, analyze and record emissions data in accordance with these requirements. Any period of downtime from meeting this requirement is reported in the Quarterly CEMS Excess Emission and Downtime Summary report submitted to the APCO. A copy of the report for this reporting period is included in **Attachment 2**.
AQ-60	The NOx, CO and O2 CEMS shall meet the requirements in 40 CFR 60, Attachment F Procedure 1 and Part 60, Attachment B Performance Specification 2 (PS 2), or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. The project owner shall submit to the CPM and APCO CEMS audits demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	CEMS are used to demonstrate compliance with NOx and CO; all emissions were within permitted emission limits unless specifically noted in **Attachment 2**, which includes a copy of the Quarterly CEMS Excess Emission and Downtime Summary report submitted to the APCO for the reporting period. Source tests are conducted every 12 or 24 months to demonstrate compliance with PM10 and VOC and the source test reports are submitted to the CMP and APCO within 60-days of completing the test; refer to AQ-50 for more information. Ongoing monitoring for SOx is not required by the permit.
AQ-61	Audits of continuous emission monitors shall be conducted as specified by 40 CFR Parts 60 (CO analyzer) and 75 (NOx and O2 analyzers) at least once every QA operating quarter. The project owner shall submit to the CPM and APCO the CEMS audits demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	Copies of audits performed on the CEMS during this compliance period are included in the Quarterly CEMS Excess Emission and Downtime Summary report included in Attachment 2.
AQ-62	The owner/operator shall perform a relative accuracy test audit (RATA) for the NOx, CO and O2 CEMS at least once every two Quality Assurance (QA) operating quarters, this frequency may be reduced to once every four QA quarters if the incentive criteria of 40 CFR 75 are met. A calendar quarter that does not qualify as a QA operating quarter shall be excluded in determining the deadline for the next RATA. No more than eight successive calendar quarters shall elapse after the quarter in which a RATA was last performed without a subsequent RATA having been conducted. The project owner shall submit to the CPM and APCO CEMS audits demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC10).	The most recent RATA test was performed in **April 2023**; a copy of the RATA report is submitted to the CPM and APCO in accordance with AQ-58. The CEMS performance met the incentive criteria of 40 CFR 75, and the units have not operated four QA operating quarters since the latest test (Q2 2023).
AQ-64	Results of the CEM system shall be averaged over a one hour period for NOx emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13.	The CEMS DAHS is programmed to record and report emissions data in accordance with these averaging periods.
AQ-65	Excess emissions shall be defined as any operating hour in which the 1-hour NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). The project owner shall submit to the CPM and APCO emission data and monitor downtime data in the Quarterly Operation Reports (AQ-SC10) that follows the definitions of this condition.	CEMS is used to demonstrate compliance; all emissions were within the permitted emission limits unless specifically noted in **Attachment 2**, which includes a copy of the Quarterly CEMS Excess Emission and Downtime Summary report submitted to the APCO for the reporting period.
AQ-66	Results of continuous emissions monitoring shall be reduced according to the procedures established in 40 CFR, Part 51, Attachment P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA.	The CEMS DAHS is programmed to record and report emissions data in accordance with these averaging periods.
AQ-70	The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter. The project owner shall submit to the CPM and APCO the CEMS audits demonstrating compliance with this condition as part of the Quarterly Operation Report required by this condition and condition AQ-SC10.	A copy of the Quarterly CEMS Excess Emission and Downtime Summary report submitted to the APCO for the reporting period is included in **Attachment 2**.

Condition	Description of Action	Status / Comments
AQ-72	Notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. Submit written copies of these notification reports to the CPM and the APCO as part of the Quarterly Operation Report.	Breakdown notifications, if applicable during this reporting period are contained in **Attachment 2**.
AQ-73	The District shall be notified in writing within ten days following the correction of any breakdown condition. Submit written copies of these notification reports to as part of the Quarterly Operation Report.	Breakdown notifications, if applicable during this reporting period are contained in **Attachment 2**.
AQ-77	Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021. Document compliance with Rule 8021 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-79	Prevent or cleanup any carryout or track out in accordance with the requirements of District Rule 8041. Document compliance with Rule 8041 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-80	Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051. Document compliance with Rule 8051 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-81	Any paved road or unpaved road shall comply with the requirements of District Rule 8061 or Rule 8011. Document compliance with Rule 8061 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-82	Water, gravel, road mix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road (District Rule 8071). Document compliance with Rule 8071 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-83	Where dusting materials are allowed to accumulate on paved surfaces, the accumulation shall be removed daily or water and/or chemical/organic dust stabilizers/suppressants shall be applied to the paved surface as required to maintain continuous compliance with the requirements for a stabilized unpaved road as defined in Section 3.59 of District Rule 8011 and limit Visible Dust Emissions (VDE) to 20% opacity. Document compliance with Rule 8071 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-84	On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the project owner shall apply water, gravel, road mix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity. Document compliance with Rule 8071 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-85	Whenever any portion of the site becomes inactive, the project owner shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in Section 3.58 of District Rule 8011. Document compliance with Rule 8011 in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-86	Records and other supporting documentation shall be maintained as required to demonstrate compliance with the requirements of the rules under Regulation VIII only for those days that a control measure was implemented. Document compliance with Regulation VIII in the Quarterly Operation Report.	There were no activities conducted during the quarter that would have triggered the requirements of this Rule.
AQ-SC8	Demonstrate that the actual annual SO2 emissions remain below the 2.28 tons of emissions that have been offset by complying with this condition.	Included in **Attachment 5** is a summary of monthly and annual emissions from each turbine over the latest twelve months.
AQ-SC10	The project owner shall submit the Quarterly Operation Reports to the CPM and APCO no later than 30 days following the end of each calendar quarter that include operational and emissions information as necessary to demonstrate compliance with the Conditions of Certification.	This report demonstrates compliance with this requirement.

Attachment 1

Natural Gas Sulfur Content

Gas System Sulfur Survey Results

Note: Starting Q4 2022, we began breaking sulfur data down monthly. Data will still be updated on a quarterly basis just with additional granularity.

2021 - 2024

2024

Date	Total Sulfur Maximum		Total Sulfur Average all sites	
	PPMv	gr/100 scf	PPMv	gr/100 scf
2024				
Third Quarter	4.3	0.25	2.8	0.17
Third Quarter - July	4.2	0.25	2.8	0.17
Third Quarter - August	4.3	0.25	2.9	0.17
Third Quarter - September	4.1	0.24	3.0	0.18
Second Quarter	4.1	0.24	2.7	0.16
Second Quarter - April	3.6	0.21	2.7	0.16
Second Quarter - May	4.0	0.24	2.8	0.16
Second Quarter - June	4.1	0.24	3.0	0.17
First Quarter	3.8	0.23	2.9	0.17
First Quarter - January	3.8	0.23	3.0	0.18
First Quarter - February	3.8	0.23	3.0	0.18
First Quarter - March	3.5	0.21	2.6	0.15

2023

Attachment 2

Quarterly CEMS Excess Emissions & Downtime Report

4350 Executive Drive
Suite320
San Diego, CA 92121
619-756-5795

October 23, 2024

San Joaquin Valley Air Pollution Control District
Central Region
Attn.: Preet Bath
1990 East Gettysburg Ave.
Fresno, CA 93726

Subject**: Quarterly CEMS Report – 3rd Quarter 2024**

Dear Ms. Bath:

Pursuant to Condition 45 of Permit to Operate (PTO) Nos. C-7286-1-4, C-7286-2-4, C-7286-3-4, and C-7286-4-4, Midway Peaking, LLC hereby submits the Quarterly CEMS Excess Emission and Downtime Summary Report for the third quarter of 2024.

If you have any questions regarding any of the information provided in this submittal, or require additional information, please contact Tony Gilmore, Compliance Manager at 619-756-5795.

Sincerely,

Claude Couvillion
Senior Vice President of Operations and Development
Midway Peaking, LLC

cc

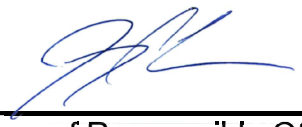
- Kathy Hurstr, Director of EHS, Middle River Power (e copy)
- Ramiro Gonzalez, Plant Manager, CalPeak Power, LLC (e copy)
- Taylor Leach, Environmental Specialist, NAES (e copy)

San Joaquin Valley
Unified Air Pollution Control District

Certification of Truth and Accuracy

Company Name: Midway Peaking,LLC	Facility ID: C - 7286

I declare, under penalty of perjury under the laws of the state of California that based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete:



Signature of Responsible Official

10/23/2024

Date

Claude Couvillion

Name of Responsible Official (please print)

Senior Vice President of Operations and Development

Title of Responsible Official (please print)

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

☐ Northern Region ☒ Central Region ☐ Southern Region

QUARTERLY CEMS EXCESS EMISSION AND DOWNTIME SUMMARY

1st ☐ JAN - MAR 20___ 3rd ☒ JUL - SEPT 2024

2nd ☐ APR - JUN 20___ 4th ☐ OCT - DEC 20___

Facility Name: Midway Peaking, LLC Permit #: **C-7286-1-4 & 2-4 (Midway 1)**

Location: 43627 West Panoche Rd. City: Firebaugh

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

Process Equipment Description: 60 MW, simple cycle gas turbine, peaking unit, 611 MMBtu/hr

Pollutants Monitored: ☒ NO_X ☐ SO_X ☒ CO ☐ Opacity ☒ O_2 ☐ CO_2 ☐ NH_3
☐ Other: _____

Total Hours Process Equipment Operated During Quarter: 73

CEM Unit Information

Pollutant	Manufacturer / Model	Serial #	Date Installed	Total Hours CEMS Operated During Qtr
NO_X	TAPI 200EM	374	Q2 2009	102
SO_X				
CO	TAPI 300E	1892	Q2 2009	102
Opacity				
O_2	TAPI 300E	1892	Q2 2009	102
CO_2				
NH_3				
Other				

Date of Last Performance Specification Test

Pollutant	NO_X	SO_X	CO	Opacity	O_2	CO_2	NH_3	Other
Date	9/4/24		9/4/24		9/5/24			
Type	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA
	☐ CGA	☐ CGA	☒ CGA	☐ CGA	☐ CGA	☐ CGA	☐ CGA	☐ CGA
	☒ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☒ Linearity	☐ Linearity	☐ Linearity	☐ Linearity

Emission Limits (From Operating Permits)						
Pollutant	ppm @ O_2%	lb/MMBtu	lb/hr[1]	lb/day[1]	lbs/yr [1]	NSPS (Subpart KKKK)
NO_X	2.5	N/A	2.8/5.6	79.8 / 159.6	12,736 / 25,742	25
SO_X						
CO	6.0	N/A	4.19/8.38	117.6 / 235.2	18,826 / 37,652	N/A
Opacity						
O_2						
CO_2						
NH_3						
Other						

Note 1: Midway Unit 1 has a mass emission limit that applies to a single engine, and a mass emission limit that applies when two engines are in operation, presented above as “one engine / two engines”.

Excess Emissions Information (Report in Hours)								
Pollutant	Start-Up / Shutdown	Process Problems	Breakdown	Other Known	Other Unknown	Total Hrs Excess	Total Op Hrs for Qtr	% Excess
NO_X	0	0	1	0	0	1	102	1.0
SO_X								
CO	0	0	0	0	0	0	102	0
Opacity								
O_2								
CO_2								
NH_3								
Other								

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

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

CEM Downtime Information (Report in Hours)								
Pollutant	Monitor Malfunction	Non-Monitor Malfunction	Q/A - Cal	Other	Unknown	Total Hrs Downtime	Total Hrs	% Downtime
NO_X	0	0	1	0	0	1	102	1.0
SO_X								
CO	0	0	1	0	0	1	102	1.0
Opacity								
O_2	0	0	1	0	0	1	102	1.0
CO_2								
NH_3								
Other								

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

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

1 Midway NOx/H Linearity

Calpeak

Test Information

Test Date	**9/4/2024**
Test Reason	
Grace Period	No
Aborted	No
Result	**Passed**

Unit online during QA test

Analyzer and Monitor Information

Range	High
Instrument Span	250 ppm
Component ID	110
Manufacturer	TELEDYNE
Model	M200EM
Serial Number	374

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	6:05 PM	57.00	55.49		Allowable Reference Values: 50-75 ppm (20-30% of span)
2	6:18 PM	57.00	60.60		
3	6:30 PM	57.00	60.35		Cylinder ID: CC755708
Mean (ppm)		57.00	58.81		Expiration Date: 11/29/2030
Difference of means (|R-A|) (ppm)		1.8	*Limit 5*	*Passed*	EPA Vendor ID: W12022
Linearity Error (%)		3.2	*Limit 5.0*	*Passed*	Cylinder contains: CO,NO,NOX,BALN
Mid Gas					
1	6:09 PM	141.30	141.13		Allowable Reference Values: 125-150 ppm (50-60% of span)
2	6:22 PM	141.30	141.85		
3	6:35 PM	141.30	141.92		Cylinder ID: CC755707
Mean (ppm)		141.30	141.63		Expiration Date: 11/29/2030
Difference of means (|R-A|) (ppm)		0.3	*Limit 5*	*Passed*	EPA Vendor ID: W12022
Linearity Error (%)		0.2	*Limit 5.0*	*Passed*	Cylinder contains: CO,NO,NOX,BALN
High Gas					
1	6:13 PM	226.00	228.87		Allowable Reference Values: 200-250 ppm (80-100% of span)
2	6:26 PM	226.00	227.17		
3	6:39 PM	226.00	225.68		Cylinder ID: EB0149931
Mean (ppm)		226.00	227.24		Expiration Date: 5/25/2030
Difference of means (|R-A|) (ppm)		1.2	*Limit 5*	*Passed*	EPA Vendor ID: W12022
Linearity Error (%)		0.5	*Limit 5.0*	*Passed*	Cylinder contains: CO,NO,NOX,BALN

Linearity Error (LE) Determination

*LE (%) = (|R-A| / R) * 100*

R = Reference gas value

A = Mean of actual CEMS responses

1 Midway NOx/L CGA

Calpeak

Test Information

Test Date	**7/24/2024**
Result	**Passed**

Analyzer and Monitor Information

Range	Low
Instrument Span	10 ppm
Manufacturer	TELEDYNE
Model	M200EM
Serial Number	374

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	7:43 AM	2.560	2.384		Allowable Reference Values: 2-3 ppm (20-30% of span)
2	7:52 AM	2.560	2.460		
3	8:00 AM	2.560	2.498		Cylinder ID: CC760992
	Mean (ppm)	2.560	2.447		Expiration Date: 12/3/2025
	Difference of means (Cm-Ca) (ppm)	-0.1	*Limit 2*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	-4.4	*Limit 15*	*Passed*	Cylinder contains: BALN,CO,NO,NOX
Mid Gas					
1	7:48 AM	5.420	4.147		Allowable Reference Values: 5-6 ppm (50-60% of span)
2	7:56 AM	5.420	4.209		
3	8:05 AM	5.420	4.229		Cylinder ID: CC754803
	Mean (ppm)	5.420	4.195		Expiration Date: 1/17/2026
	Difference of means (Cm-Ca) (ppm)	-1.2	*Limit 2*	*Passed*	EPA Vendor ID: W12023
	CEMS Accuracy (%)	-22.6	*Limit 15*		Cylinder contains: BALN,CO,NO,NOX

CEMS Accuracy Determination (%)

*Accuracy (%) = ((Cm - Ca) / Ca) * 100*

Ca = Reference gas value

Cm = Mean of actual CEMS responses

1 Midway CO/H CGA

Calpeak

Test Information

Test Date	**9/4/2024**
Result	**Passed**

Analyzer and Monitor Information

Range	High
Instrument Span	1000 ppm
Manufacturer	TELEDYNE
Model	M300E
Serial Number	1892

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	6:05 PM	276.600	292.642		Allowable Reference Values: 200-300 ppm (20-30% of span)
2	6:18 PM	276.600	293.587		
3	6:30 PM	276.600	294.253		Cylinder ID: CC755708
	Mean (ppm)	276.600	293.494		Expiration Date: 11/29/2030
	Difference of means (Cm-Ca) (ppm)	16.9	*Limit 5*		EPA Vendor ID: W12022
	CEMS Accuracy (%)	6.1	*Limit 15*	*Passed*	Cylinder contains: CO,NO,NOX,BALN
Mid Gas					
1	6:09 PM	548.000	560.713		Allowable Reference Values: 500-600 ppm (50-60% of span)
2	6:22 PM	548.000	562.568		
3	6:35 PM	548.000	565.254		Cylinder ID: CC755707
	Mean (ppm)	548.000	562.845		Expiration Date: 11/29/2030
	Difference of means (Cm-Ca) (ppm)	14.8	*Limit 5*		EPA Vendor ID: W12022
	CEMS Accuracy (%)	2.7	*Limit 15*	*Passed*	Cylinder contains: CO,NO,NOX,BALN

CEMS Accuracy Determination (%)

*Accuracy (%) = ((Cm - Ca) / Ca) * 100*

Ca = Reference gas value

Cm = Mean of actual CEMS responses

1 Midway CO/L CGA

Calpeak

Test Information

Test Date	**7/24/2024**
Result	**Passed**

Analyzer and Monitor Information

Range	Low
Instrument Span	20 ppm
Manufacturer	TELEDYNE
Model	M300E
Serial Number	1892

Low Gas

Run	Time	Reference Gas	CEMS Response		Cylinder Information
1	7:43 AM	4.920	5.058		Allowable Reference Values: 4-6 ppm (20-30% of span)
2	7:52 AM	4.920	5.108		
3	8:00 AM	4.920	5.142		Cylinder ID: CC760992
	Mean (ppm)	4.920	5.103		Expiration Date: 12/3/2025
	Difference of means (Cm-Ca) (ppm)	0.2	*Limit 2*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	3.7	*Limit 15*	*Passed*	Cylinder contains: CO,NO,NOX,BALN

Mid Gas

Run	Time	Reference Gas	CEMS Response		Cylinder Information
1	7:48 AM	10.600	10.590		Allowable Reference Values: 10-12 ppm (50-60% of span)
2	7:56 AM	10.600	10.617		
3	8:05 AM	10.600	10.601		Cylinder ID: CC754803
	Mean (ppm)	10.600	10.603		Expiration Date: 1/17/2026
	Difference of means (Cm-Ca) (ppm)	0.0	*Limit 2*	*Passed*	EPA Vendor ID: W12023
	CEMS Accuracy (%)	0.0	*Limit 15*	*Passed*	Cylinder contains: CO,NO,NOX,BALN

CEMS Accuracy Determination (%)

*Accuracy (%) = ((Cm - Ca) / Ca) * 100*

Ca = Reference gas value

Cm = Mean of actual CEMS responses

1 Midway O2 Linearity

Calpeak

Test Information

Test Date	**9/5/2024**
Test Reason	
Grace Period	No
Aborted	No
Result	**Passed**

Unit online during QA test

Analyzer and Monitor Information

Range	Single Scale
Instrument Span	21 %O2
Component ID	120
Manufacturer	TELEDYNE
Model	M300E
Serial Number	1892

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	5:11 PM	5.450	5.448		
2	5:20 PM	5.450	5.429		Allowable Reference Values: 4.2-6.3 %O2 (20-30% of span)
3	5:29 PM	5.450	5.441		
Mean (%O2)		5.450	5.439		Cylinder ID: CC460556
Difference of means (|R-A|) (%O2)		0.0	*Limit 0.5*	*Passed*	Expiration Date: 11/19/2030
Linearity Error (%)		0.2	*Limit 5.0*	*Passed*	EPA Vendor ID: W12022
					Cylinder contains: O2,BALN
Mid Gas					
1	5:14 PM	11.600	11.552		Allowable Reference Values: 10.5-12.6 %O2 (50-60% of span)
2	5:23 PM	11.600	11.581		
3	5:32 PM	11.600	11.540		
Mean (%O2)		11.600	11.558		Cylinder ID: CC755982
Difference of means (|R-A|) (%O2)		0.0	*Limit 0.5*	*Passed*	Expiration Date: 11/19/2030
Linearity Error (%)		0.4	*Limit 5.0*	*Passed*	EPA Vendor ID: W12022
					Cylinder contains: O2,BALN
High Gas					
1	5:17 PM	19.070	19.036		Allowable Reference Values: 16.8-21 %O2 (80-100% of span)
2	5:26 PM	19.070	19.076		
3	5:35 PM	19.070	19.050		
Mean (%O2)		19.070	19.054		Cylinder ID: CC33281
Difference of means (|R-A|) (%O2)		0.0	*Limit 0.5*	*Passed*	Expiration Date: 3/19/2032
Linearity Error (%)		0.1	*Limit 5.0*	*Passed*	EPA Vendor ID: W12024
					Cylinder contains: O2,BALN

Linearity Error (LE) Determination

*LE (%) = (|R-A| / R) * 100*

R = Reference gas value

A = Mean of actual CEMS responses

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 4-Hr (Subpart KKKK)

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 4-Hr (Subpart KKKK) excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	14 hours, 39 minutes
Duration of NOx Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/D

Reason	Duration
Startup / Shutdown (excess)	1 minute

Source operating time	5 hours, 28 minutes
Duration of NOx Lb/hr Per S/D excess emissions	1 minute
Source operating time with excess emissions	0.3%

1 Midway Excess Emissions

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/D

Parameter	Start	End	Duration	Value	Min	Max	Limit	Reason	Action
NOx Lb/hr Per S/D	7/2/2024 11:41 PM	11:41 PM	1 minute	3.19	3.19	3.19	3.00	Startup / Shutdown (excess)	None
Total duration			1 minute						

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops NOx lbs 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops NOx lbs 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO ppm @15% O2 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO ppm @15% O2 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	14 hours, 39 minutes
Duration of CO Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 28 minutes
Duration of CO Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops CO lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops CO lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

4350 Executive Drive
Suite 320
San Diego, CA 92121
619-756-5795

July 11, 2024

Preet Bath
Air Quality Inspector
San Joaquin Valley APCD
1990 East Gettysburg Avenue
Fresno, CA 93726-0244

RE: **Title V – Deviation/Breakdown Report C-2024-7-5**
Date of Occurrence: 7/2/2024
Date of Discovery: 7/2/2024
Midway Peaking, LLC

Dear Ms. Bath:

Pursuant to condition 11 of Permit to Operate (PTO) C-7286-0-2, Midway Peaking, LLC hereby submits the attached Title V Deviation Report, including the associated Certification of Truth and Accuracy.

Midway Peaking, LLC is committed to safe and environmentally responsible operations. Should you require additional information please contact Tony Gilmore, Compliance Manager at 619-756-5795.

Sincerely,

Claude Couvillion
SVP of Operations and Development
Middle River Power, LLC

4350 Executive Drive
Suite 320
San Diego, CA 92121
619-756-5795

DISTRIBUTION LIST

- Preet Bath, Air Quality Inspector, San Joaquin Valley Air Pollution Control District (e copy)
- Ramiro Gonzalez, Plant Manager, Midway Peaking (e copy)
- Kathy Hurst, Director of EHS, Middle River Power (e copy)
- Taylor Leach, Environmental Specialist, NAES (e copy)

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

BREAKDOWN / TITLE V - DEVIATION REPORTING FORM

Check the appropriate box if using this form to submit/report a:

☐ Breakdown Notification (must be reported within 1 hour)

☐ Title V Deviation

☐ Breakdown Follow-up Report

☒ Title V Deviation/Breakdown Follow-up Report

This form can be used to file the initial report of an equipment breakdown, and as the follow-up report for both a breakdown and/or deviation from a Federal Title V permit condition. The required reports must be submitted to the nearest District regional office as follows:

- Breakdown follow-up reports no later than 10 days after returning to compliance
- Deviation reports no later than 10 days after discovery

Company Name: Midway Peaking, LLC Facility ID: **C-7286**

Breakdown - Initial Notification:

Reported by: R. Howard Date: 07/3/2024

Reported to: SJVAPCD phone call followed by Fax Time: 00:30 AM (CEMS)

BREAKDOWN / DEVIATION INFORMATION

1.	Permit unit and condition number(s): C-7286-0-2, Condition 5 C-7286-1-6, C-7286-2-6, Condition 11
2.	Equipment involved: Midway Unit 1 NOx control NH3 flow regulation valve.
3.	Location of operation: 43627 W Panoche Rd, Firebaugh, CA 93622
4.	Description of permit condition: C-7286-0-2, Condition 5: The permittee must comply with all conditions of the permit including permit revisions originated by the District. C-7286-1-6, -2-6 Condition 11: During **shutdown**, CTG exhaust emission rates shall not exceed any of the following limits: **NOx (as NO2) - 1.50 lb/hr;** CO- 21.33 lb/hr; VOC (as methane)- 0.83 lb/hr; PM10- 1.85 lb/hr; or SOx (as SO2)- 0.89 lb/hr, based on a per event average.

5. Date, time, and duration of breakdown/deviation:

   Deviation Period: 07/02/2024, 23:31 to 23:40 PM (a shutdown event totaling 10-minutes)

   Breakdown Period: 07/02/2024, from 23:35 to 23:41 PM.

   [Note: All time periods in this report are in CEMS time]

6. Description of breakdown/deviation (include excess and visible emissions, if applicable):

   Unit 1 (C-7286-1-6, -2-6) experienced a premature loss of NH3 flow to SCR NOx control vaporizing component. This loss of NH3 flow to the NOx emission control system caused excess shutdown emissions.

   Shutdown excess emissions:

   - NOx lb/hr:
     - 07/02/2024, 23:31 to 23:40 PM (CEMS) – 3.19 lb/hr (Permit limit 3.00 lb/hr, event average two engine operation)

7. Date and time when breakdown/deviation was discovered:

   07/02/2024 at 23:41 PM (CEMS time)

8. Date and time compliance was achieved:

   07/02/2024 at 23:41 PM (CEMS time), after unit shut down and alarm noted.

9. Probable cause of breakdown/deviation:

   Event investigation determined that during the Unit 1 shutdown, the NH3 flow was adjusted as required corresponding to MW load being shed during the shutdown process. This is done to alleviate the possible over injection of NH3 during the shutdown process which could potentially lead to an excess NH3 slip condition or loss of vaporizer efficiency. During the NH3 flow control setpoint changes through this shutdown evolution, the NH3 flow unexpectedly shut off rather than reduced the flow 6 minutes before fuel shutoff to the turbines. This resulted in the NOx shutdown limit of 3.0 lbs/hr to be exceeded by 0.19 lbs.

   During normal stable operation, the NH3 flow control valve function is automatic. This valve reacts to indicated NOx emissions and makes NH3 flow adjustments accordingly. If deemed necessary during a shutdown sequence, the valve reaction time can be augmented with a manual setpoint change to respond more effectively. These adjustments are based on the rate the unit is shedding load and current emission values at the time. If left in an automatic configuration during unit shutdown, the NH3 flow reaction time is too slow to maintain a proper NOx/NH3 balance while being within the specified permit limits before the fuel flow terminates to the engines. The operations staff have observed and are familiar with this behavior and it is necessary to take actions based on plant performance to ensure emissions are controlled during shutdown events. During unit shutdown one of the NH3 flow adjustments required to maintain emissions compliance cut NH3 flow due to the controls and the fluctuating emissions as the unit is shutting down. Before action could be taken to restore NH3 flow and maintain emissions compliance, the facility shut down, resulting in a brief excess emissions event.

	The system lost NH3 flow resulting in 6 minutes of NOx emissions without ammonia flow. Although operations after detection of the high emissions levels were brief, the time before shutdown occurred was sufficient to exceed the NOx lbs/hr permit limit. (see attached CEMS reports)
10.	Measures taken to correct this occurrence and prevent recurrence: To following steps were implemented to investigate the cause and to prevent a recurrence: - Check and recalibrate, as needed the indicated flow control signal to actual valve position. - Contracted with an outside engineering firm to modify NH3 flow control system to react and control NOx emissions in a more effective and efficient process.

- Attach photographs of defective equipment.

- Provide any additional information necessary to establish that this occurrence was the result of an unavoidable failure or malfunction; Rule 1100 – *Equipment Breakdown* assigns the burden of proof to the source owner/operator seeking relief.

See attached CEMS Emissions and Operating Data

CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that based on information and belief formed after reasonable inquiry, all information provided in this report is true, accurate, and addresses all deviations that resulted from this event:

Signature of Responsible Official *(Responsible Official only required for Title V Permit Holders)*	07/11/2024 Date
Claude Couvillion Name of Responsible Official	760-912-3007 Telephone
SVP of Operations and Development Title of Responsible Official	jcouvillion@mrpgenco.com Email

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/2/2024: NOx Lb/hr Per S/D

Reason	Duration
Startup / Shutdown (excess)	1 minute
Source operating time	20 minutes
Duration of NOx Lb/hr Per S/D excess emissions	1 minute
Source operating time with excess emissions	5.0%

1 Midway Excess Emissions

Calpeak

Excess Emissions for 7/2/2024: NOx Lb/hr Per S/D

Parameter	Start	End	Duration	Value	Min	Max	Limit	Reason	Action
NOx Lb/hr Per S/D	7/2/2024 11:41 PM	11:41 PM	1 minute	3.19	3.19	3.19	3.00	Startup / Shutdown (excess)	None
Total duration			1 minute						

Calpeak

California

Midway 1- Hourly Emissions Report

July 2, 2024 - Hour 23

Emission Limits

1-Hr	*3-Hr Rolling*	*24-Hr Rolling*
NOx ppm @15% O2 - 2.5	CO ppm @15% O2 - 6	NH3 Slip ppm @15% O2 - 10
NOx lbs - 2.8	CO lbs - 4.19	NH3 Slip lbs - ERR

Minute	O2%	NOx ppm	NOx ppm @15% O2	NOx lb/mmBtu	NOx lb/hr	CO ppm	CO ppm @15% O2	CO lb/mmBtu	CO lb/hr	NH3 Slip ppm @15% O2	NH3 Slip lb/hr	Process Status
00	15.93	1.43	1.70	0.0062	3.44	3.07	3.64	0.0081	4.49	0.6	0.55	Normal
01	15.91	1.43	1.69	0.0062	3.44	3.37	3.98	0.0089	4.93	0.7	0.55	Normal
02	15.92	1.44	1.71	0.0062	3.42	2.81	3.33	0.0074	4.09	0.7	0.55	Normal
03	15.91	1.48	1.75	0.0064	3.55	2.38	2.81	0.0063	3.49	0.8	0.55	Normal
04	15.92	1.51	1.79	0.0065	3.59	2.59	3.07	0.0068	3.76	0.8	0.55	Normal
05	15.92	1.49	1.77	0.0064	3.54	2.96	3.51	0.0078	4.32	0.8	0.55	Normal
06	15.90	1.48	1.75	0.0064	3.54	3.27	3.86	0.0086	4.76	0.9	1.11	Normal
07	15.92	1.46	1.73	0.0063	3.49	3.17	3.76	0.0083	4.60	0.7	0.55	Normal
08	15.92	1.45	1.72	0.0063	3.48	2.94	3.48	0.0077	4.25	0.8	0.55	Normal
09	15.94	1.47	1.75	0.0064	3.54	2.88	3.43	0.0076	4.21	0.7	0.55	Normal
10	15.94	1.48	1.76	0.0064	3.54	2.98	3.54	0.0079	4.38	0.6	0.55	Normal
11	15.94	1.47	1.75	0.0064	3.54	3.09	3.68	0.0082	4.54	0.7	0.55	Normal
12	15.94	1.46	1.74	0.0063	3.49	2.77	3.29	0.0073	4.04	0.6	0.55	Normal
13	15.95	1.45	1.73	0.0063	3.48	2.74	3.27	0.0073	4.03	0.6	0.55	Normal
14	15.94	1.45	1.72	0.0063	3.48	2.87	3.41	0.0076	4.21	0.6	0.55	Normal
15	15.94	1.45	1.72	0.0063	3.49	3.01	3.58	0.0080	4.43	0.6	0.55	Normal
16	15.95	1.45	1.73	0.0063	3.48	3.04	3.62	0.0081	4.48	0.6	0.55	Normal
17	15.96	1.44	1.72	0.0063	3.48	2.88	3.44	0.0076	4.20	0.6	0.55	Normal
18	15.97	1.44	1.72	0.0063	3.48	2.56	3.06	0.0068	3.75	0.5	0.55	Normal
19	15.97	1.43	1.71	0.0062	3.43	2.49	2.98	0.0066	3.65	0.5	0.55	Normal
20	15.95	1.41	1.68	0.0061	3.37	2.87	3.42	0.0076	4.19	0.6	0.55	Normal
21	15.93	1.43	1.70	0.0062	3.43	3.07	3.64	0.0081	4.48	0.7	0.55	Normal
22	15.95	1.44	1.72	0.0063	3.49	2.96	3.53	0.0078	4.31	0.6	0.55	Normal
23	15.91	1.43	1.69	0.0062	3.43	3.12	3.69	0.0082	4.54	0.8	0.55	Normal
24	15.91	1.40	1.66	0.0060	3.31	3.19	3.77	0.0084	4.64	0.8	0.55	Normal
25	15.93	1.41	1.67	0.0061	3.37	3.14	3.73	0.0083	4.59	0.7	0.55	Normal
26	15.95	1.45	1.73	0.0063	3.48	3.01	3.59	0.0080	4.42	0.6	0.55	Normal
27	15.96	1.45	1.73	0.0063	3.48	3.31	3.95	0.0088	4.86	0.6	0.55	Normal
28	15.95	1.44	1.72	0.0063	3.48	2.97	3.54	0.0079	4.36	0.6	0.55	Normal
29	15.96	1.45	1.73	0.0063	3.48	2.85	3.40	0.0076	4.21	0.5	0.55	Normal
30	16.02	1.45	1.75	0.0064	3.20	3.20	3.87	0.0086	4.31	2.9	3.00	Normal

Minute	O2%	NOx ppm	NOx ppm @15% O2	NOx lb/mmBtu	NOx lb/hr	CO ppm	CO ppm @15% O2	CO lb/mmBtu	CO lb/hr	NH3 Slip ppm @15% O2	NH3 Slip lb/hr	Process Status
31	16.62	1.44	1.99	0.0072	2.81	1.99	2.74	0.0061	2.38	6.5	6.63	Shutdown
32	17.22	1.35	2.16	0.0079	2.40	1.47	2.36	0.0052	1.57	0.0	0.00	Shutdown
33	17.79	1.16	2.20	0.0080	1.91	1.82	3.45	0.0077	1.83	0.0	0.00	Shutdown
34	18.12	1.29	2.74	0.0100	1.56	1.74	3.69	0.0082	1.28	0.0	0.00	Shutdown
35	18.91	1.89	5.60	0.0205	1.78	2.25	6.67	0.0148	1.29	**Down**	**Down**	Shutdown
36	19.26	4.21	13.07	0.0477	3.09	1.55	4.81	0.0107	0.69	**Down**	**Down**	Shutdown
37	19.18	4.78	14.84	0.0542	3.54	0.66	2.05	0.0046	0.30	**Down**	**Down**	Shutdown
38	19.15	5.62	17.45	0.0637	4.21	0.47	1.46	0.0032	0.21	**Down**	**Down**	Shutdown
39	19.13	6.58	20.43	0.0746	4.96	0.00	0.00	0.0000	0.00	**Down**	**Down**	Shutdown
40	19.12	7.50	23.29	0.0850	5.67	0.07	0.22	0.0005	0.04	**Down**	**Down**	Shutdown
41	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
42	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
43	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
44	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
45	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
46	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
47	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
48	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
49	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
50	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
51	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
52	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
53	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
54	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
55	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
56	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
57	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
58	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
59	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
Average	16.6	2.0		0.0140		2.5	3.3	0.0074	3.50	0.5	0.76	Shutdown
Total									2.38		0.52	
3-Hr Rlng							3.6 *		1.1 *			
24-Hr Rlng										0.2	0.19	

** - Excluding Startup & Shutdown Emissions*

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Phone: (559) 230- 6000
Fax: (559) 230- 6061
6063

Breakdown # _____

Report of Equipment Breakdown

Company Name: Starwood Power- Midway, LLC Phone #: (619) 726- 2410
Permit Number(s): C-7286-1(2) [Midway Unit 1]
Equipment Involved:
Location of Property (Address, Lease, Field, Section, Township, Range):
43627 West Panoche Road,
Firebaugh, CA 93622
Date and Time of Occurrence: 7-3-24 1241 (1141 CEMS time)
Date and Time of Discovery: 7-3-24 1241
Time Corrective Action Commenced:
Date and Time Corrective Action Successful:

Estimated Emissions:

Pollutant	Estimated Emission Rate:	Visible (Yes or No)
NOx lbs/hr on shutdown	.19 lbs/hr over shut down limit	No

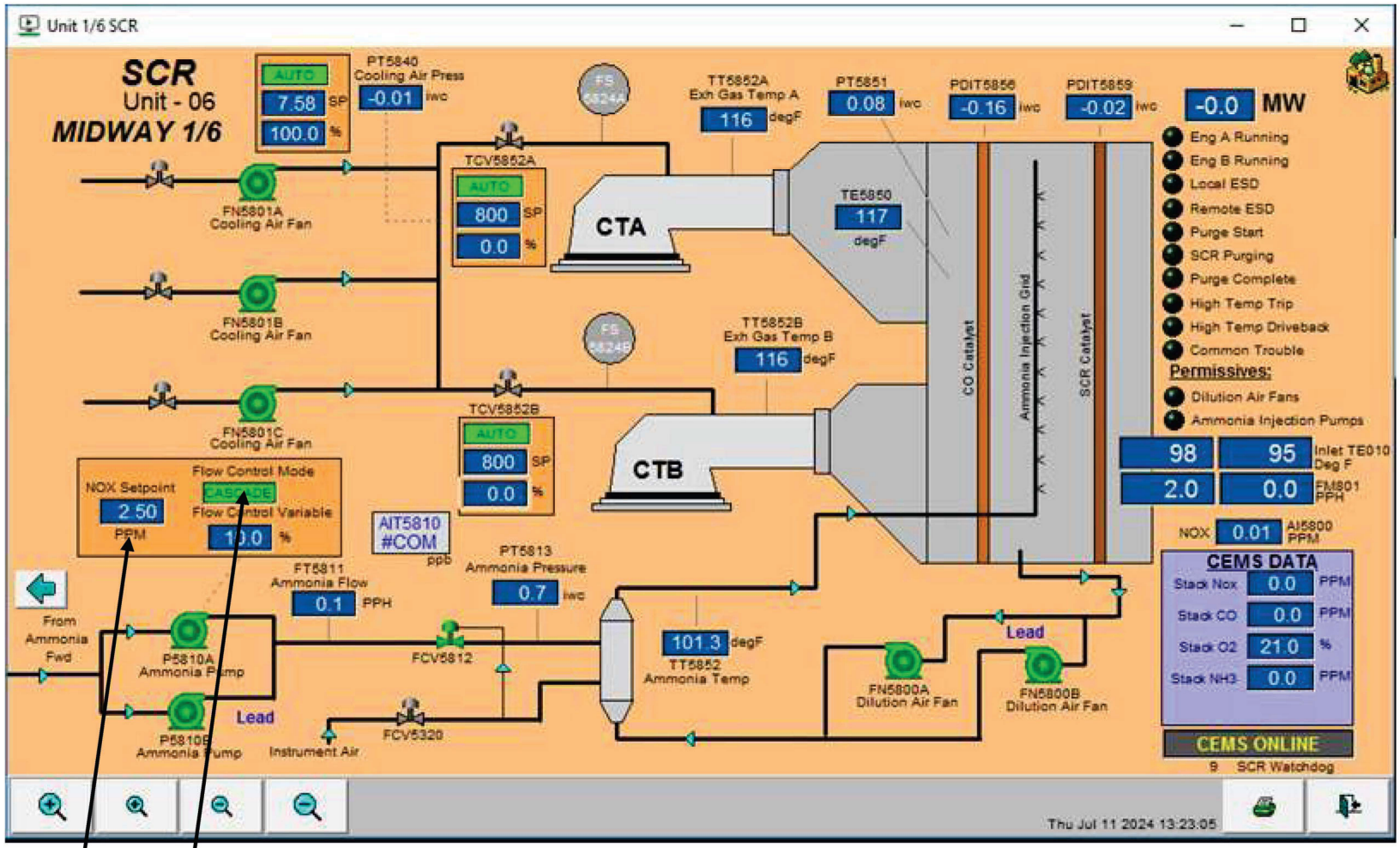
Cause of the Occurrence:
Under investigation.

Measures Taken to Correct this Occurrence and Prevent its Recurrence:

Attach Photographs of Defective Equipment.

Provide any additional information necessary to establish that this occurrence was the result of an unavoidable failure or malfunction. Rule 1100 – Equipment Breakdown assigns the burden of proof to the source operator seeking exemption from legal action. An exception cannot be granted for an occurrence, which was the result of negligence.

Initial Notification: Reported By: R. Howard Date: 7.3-24
Reported To: Left msg with district Time: 0130



Auto/Manual select

NOx setpoint input

1 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2

Reason	Duration
Quality Assurance (down)	1 hour

Source operating time	102 hours
Duration of NOx ppm @15% O2 monitor downtime	1 hour
Percent monitor downtime	1.0%
Source operating time with valid data	101 hours
Percent monitor availability	99.0%

1 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2

Parameter	Start	End	Duration	Reason	Action
NOx ppm @15% O2	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
	Total duration		1 hour		

1 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx lbs

Reason	Duration
Quality Assurance (down)	1 hour
Source operating time	102 hours
Duration of NOx lbs monitor downtime	1 hour
Percent monitor downtime	1.0%
Source operating time with valid data	101 hours
Percent monitor availability	99.0%

1 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx lbs

Parameter	Start	End	Duration	Reason	Action
NOx lbs	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
	Total duration		1 hour		

1 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO ppm @15% O2

Reason	Duration
Quality Assurance (down)	1 hour
Source operating time	102 hours
Duration of CO ppm @15% O2 monitor downtime	1 hour
Percent monitor downtime	1.0%
Source operating time with valid data	101 hours
Percent monitor availability	99.0%

1 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO ppm @15% O2

Parameter	Start	End	Duration	Reason	Action
CO ppm @15% O2	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
	Total duration		1 hour		

1 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO lbs

Reason	Duration
Quality Assurance (down)	1 hour
Source operating time	102 hours
Duration of CO lbs monitor downtime	1 hour
Percent monitor downtime	1.0%
Source operating time with valid data	101 hours
Percent monitor availability	99.0%

1 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO lbs

Parameter	Start	End	Duration	Reason	Action
CO lbs	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
	Total duration		1 hour		

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

☐ Northern Region ☒ Central Region ☐ Southern Region

QUARTERLY CEMS EXCESS EMISSION AND DOWNTIME SUMMARY

1st ☐ JAN - MAR 20___ 3rd ☒ JUL - SEPT 2024

2nd ☐ APR - JUN 20___ 4th ☐ OCT - DEC 20___

Facility Name: Midway Peaking, LLC Permit #: **C-7286-3-4 & -4-4 (Midway 2)**

Location: 43627 West Panoche Rd. City: Firebaugh

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

Process Equipment Description: 60 MW, simple cycle gas turbine, peaking unit, 611 MMBtu/hr

Pollutants Monitored: ☒ NO_X ☐ SO_X ☒ CO ☐ Opacity ☒ O_2 ☐ CO_2 ☐ NH_3
☐ Other: _____

Total Hours Process Equipment Operated During Quarter: 73

CEM Unit Information

Pollutant	Manufacturer / Model	Serial #	Date Installed	Total Hours CEMS Operated During Qtr
NO_X	TAPI 200EM	375	Q2 2009	102
SO_X				
CO	TAPI 300E	1893	Q2 2009	102
Opacity				
O_2	TAPI 300E	1893	Q2 2009	102
CO_2				
NH_3				
Other				

Date of Last Performance Specification Test

Pollutant	NO_X	SO_X	CO	Opacity	O_2	CO_2	NH_3	Other
Date	9/4/24		9/4/24		9/5/24			
Type	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA	☐ RATA
	☐ CGA	☐ CGA	☒ CGA	☐ CGA	☐ CGA	☐ CGA	☐ CGA	☐ CGA
	☒ Linearity	☐ Linearity	☐ Linearity	☐ Linearity	☒ Linearity	☐ Linearity	☐ Linearity	☐ Linearity

Emission Limits (From Operating Permits)						
Pollutant	ppm @ O_2%	lb/MMBtu	lb/hr[1]	lb/day[1]	lbs/yr [1])	NSPS (Subpart KKKK)
NO_X	2.5	N/A	2.8/5.6	79.8 / 159.6	12,736 / 25,742	25
SO_X						
CO	6.0	N/A	4.19/8.38	117.6 / 235.2	18,826 / 37,652	N/A
Opacity						
O_2						
CO_2						
NH_3						
Other						

Note 1: Midway Unit 2 has a mass emission limit that applies to a single engine, and a mass emission limit that applies when two engines are in operation, presented above as “one engine / two engines”.

Excess Emissions Information (Report in Hours)								
Pollutant	Start-Up / Shutdown	Process Problems	Breakdown	Other Known	Other Unknown	Total Hrs Excess	Total Op Hrs for Qtr	% Excess
NO_X	0	0	0	0	0	0	102	0
SO_X								
CO	0	0	0	0	0	0	102	0
Opacity								
O_2								
CO_2								
NH_3								
Other								

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

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

CEM Downtime Information (Report in Hours)								
Pollutant	Monitor Malfunction	Non-Monitor Malfunction	Q/A - Cal	Other	Unknown	Total Hrs Downtime	Total Hrs	% Downtime
NO_X	0	0	1	0	0	0	102	2.0
SO_X								
CO	0	0	1	0	0	0	102	2.0
Opacity								
O_2	0	0	1	0	0	0	102	2.0
CO_2								
NH_3								
Other								

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

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

2 Midway NOx/H Linearity

Calpeak

Test Information

Test Date	**9/4/2024**
Test Reason	
Grace Period	No
Aborted	No
Result	**Passed**

Unit online during QA test

Analyzer and Monitor Information

Range	High
Instrument Span	250 ppm
Component ID	210
Manufacturer	TELEDYNE
Model	M200EM
Serial Number	375

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	6:11 PM	56.50	54.58		Allowable Reference Values: 50-75 ppm (20-30% of span) Cylinder ID: CC751838 Expiration Date: 11/29/2030 EPA Vendor ID: W12022 Cylinder contains: BALN,CO,NO,NOX
2	6:23 PM	56.50	59.74		
3	6:36 PM	56.50	59.82		
	Mean (ppm)	56.50	58.05		
	Difference of means (|R-A|) (ppm)	1.5	*Limit 5*	*Passed*	
	Linearity Error (%)	2.7	*Limit 5.0*	*Passed*	
Mid Gas					
1	6:15 PM	139.20	137.57		Allowable Reference Values: 125-150 ppm (50-60% of span) Cylinder ID: EB0144811 Expiration Date: 11/29/2030 EPA Vendor ID: W12022 Cylinder contains: BALN,CO,NO,NOX
2	6:28 PM	139.20	137.98		
3	6:40 PM	139.20	137.92		
	Mean (ppm)	139.20	137.82		
	Difference of means (|R-A|) (ppm)	1.4	*Limit 5*	*Passed*	
	Linearity Error (%)	1.0	*Limit 5.0*	*Passed*	
High Gas					
1	6:19 PM	228.00	230.01		Allowable Reference Values: 200-250 ppm (80-100% of span) Cylinder ID: EB0144953 Expiration Date: 3/27/2032 EPA Vendor ID: W12024 Cylinder contains: BALN,CO,NO,NOX
2	6:32 PM	228.00	230.09		
3	6:45 PM	228.00	228.74		
	Mean (ppm)	228.00	229.61		
	Difference of means (|R-A|) (ppm)	1.6	*Limit 5*	*Passed*	
	Linearity Error (%)	0.7	*Limit 5.0*	*Passed*	

Linearity Error (LE) Determination

*LE (%) = (|R-A| / R) * 100*

R = Reference gas value

A = Mean of actual CEMS responses

2 Midway NOx/L CGA

Calpeak

Test Information

Test Date	**7/24/2024**
Result	**Passed**

Analyzer and Monitor Information

Range	Low
Instrument Span	10 ppm
Manufacturer	TELEDYNE
Model	M200EM
Serial Number	375

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	7:54 AM	2.550	2.303		Allowable Reference Values: 2-3 ppm (20-30% of span)
2	8:02 AM	2.550	2.413		
3	8:11 AM	2.550	2.433		Cylinder ID: CC761028
	Mean (ppm)	2.550	2.383		Expiration Date: 12/3/2025
	Difference of means (Cm-Ca) (ppm)	-0.2	*Limit 2*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	-6.5	*Limit 15*	*Passed*	Cylinder contains: BALN,CO,NO,NOX
Mid Gas					
1	7:58 AM	5.530	5.390		Allowable Reference Values: 5-6 ppm (50-60% of span)
2	8:06 AM	5.530	5.429		
3	8:15 AM	5.530	5.424		Cylinder ID: CC761027
	Mean (ppm)	5.530	5.414		Expiration Date: 12/3/2025
	Difference of means (Cm-Ca) (ppm)	-0.1	*Limit 2*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	-2.1	*Limit 15*	*Passed*	Cylinder contains: BALN,CO,NO,NOX

CEMS Accuracy Determination (%)

*Accuracy (%) = ((Cm - Ca) / Ca) * 100*

Ca = Reference gas value

Cm = Mean of actual CEMS responses

2 Midway CO/H CGA

Calpeak

Test Information

Test Date	**9/4/2024**
Result	**Passed**

Analyzer and Monitor Information

Range	High
Instrument Span	1000 ppm
Manufacturer	TELEDYNE
Model	M300E
Serial Number	1893

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	6:11 PM	276.700	279.080		Allowable Reference Values: 200-300 ppm (20-30% of span)
2	6:23 PM	276.700	279.643		
3	6:36 PM	276.700	280.587		Cylinder ID: CC751838
	Mean (ppm)	276.700	279.770		Expiration Date: 11/29/2030
	Difference of means (Cm-Ca) (ppm)	3.1	*Limit 5*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	1.1	*Limit 15*	*Passed*	Cylinder contains: BALN,CO,NO,NOX
Mid Gas					
1	6:15 PM	551.000	550.550		Allowable Reference Values: 500-600 ppm (50-60% of span)
2	6:28 PM	551.000	548.192		
3	6:40 PM	551.000	548.039		Cylinder ID: EB0144811
	Mean (ppm)	551.000	548.927		Expiration Date: 11/29/2030
	Difference of means (Cm-Ca) (ppm)	-2.1	*Limit 5*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	-0.4	*Limit 15*	*Passed*	Cylinder contains: BALN,CO,NO,NOX

CEMS Accuracy Determination (%)

*Accuracy (%) = ((Cm - Ca) / Ca) * 100*

Ca = Reference gas value

Cm = Mean of actual CEMS responses

2 Midway CO/L CGA

Calpeak

Test Information

Test Date	**7/24/2024**
Result	**Passed**

Analyzer and Monitor Information

Range	Low
Instrument Span	20 ppm
Manufacturer	TELEDYNE
Model	M300E
Serial Number	1893

Low Gas

Run	Time	Reference Gas	CEMS Response		Cylinder Information
1	7:54 AM	4.880	4.851		Allowable Reference Values: 4-6 ppm (20-30% of span)
2	8:02 AM	4.880	4.960		
3	8:11 AM	4.880	4.925		Cylinder ID: CC761028
	Mean (ppm)	4.880	4.912		Expiration Date: 12/3/2025
	Difference of means (Cm-Ca) (ppm)	0.0	*Limit 2*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	0.7	*Limit 15*	*Passed*	Cylinder contains: BALN,CO,NO,NOX

Mid Gas

Run	Time	Reference Gas	CEMS Response		Cylinder Information
1	7:58 AM	10.900	10.718		Allowable Reference Values: 10-12 ppm (50-60% of span)
2	8:06 AM	10.900	10.767		
3	8:15 AM	10.900	10.832		Cylinder ID: CC761027
	Mean (ppm)	10.900	10.772		Expiration Date: 12/3/2025
	Difference of means (Cm-Ca) (ppm)	-0.1	*Limit 2*	*Passed*	EPA Vendor ID: W12022
	CEMS Accuracy (%)	-1.2	*Limit 15*	*Passed*	Cylinder contains: BALN,CO,NO,NOX

CEMS Accuracy Determination (%)

*Accuracy (%) = ((Cm - Ca) / Ca) * 100*

Ca = Reference gas value

Cm = Mean of actual CEMS responses

2 Midway O2 Linearity

Calpeak

Test Information

Test Date	**9/5/2024**
Test Reason	
Grace Period	No
Aborted	No
Result	**Passed**

Unit online during QA test

Analyzer and Monitor Information

Range	Single Scale
Instrument Span	21 %O2
Component ID	220
Manufacturer	TELEDYNE
Model	M300E
Serial Number	1893

Run	Time	Reference Gas	CEMS Response		Cylinder Information
Low Gas					
1	5:12 PM	5.470	5.444		
2	5:21 PM	5.470	5.441		Allowable Reference Values: 4.2-6.3 %O2 (20-30% of span)
3	5:30 PM	5.470	5.459		
	Mean (%O2)	5.470	5.448		Cylinder ID: CC181315
	Difference of means (|R-A|) (%O2)	0.0	*Limit 0.5*	*Passed*	Expiration Date: 11/19/2030
	Linearity Error (%)	0.4	*Limit 5.0*	*Passed*	EPA Vendor ID: W12022
					Cylinder contains: O2,BALN
Mid Gas					
1	5:15 PM	11.640	11.586		Allowable Reference Values: 10.5-12.6 %O2 (50-60% of span)
2	5:24 PM	11.640	11.581		
3	5:33 PM	11.640	11.603		
	Mean (%O2)	11.640	11.590		Cylinder ID: CC462060
	Difference of means (|R-A|) (%O2)	0.1	*Limit 0.5*	*Passed*	Expiration Date: 11/19/2030
	Linearity Error (%)	0.4	*Limit 5.0*	*Passed*	EPA Vendor ID: W12022
					Cylinder contains: O2,BALN
High Gas					
1	5:18 PM	19.060	19.042		Allowable Reference Values: 16.8-21 %O2 (80-100% of span)
2	5:27 PM	19.060	19.052		
3	5:36 PM	19.060	19.078		
	Mean (%O2)	19.060	19.057		Cylinder ID: ALM028619
	Difference of means (|R-A|) (%O2)	0.0	*Limit 0.5*	*Passed*	Expiration Date: 6/4/2032
	Linearity Error (%)	0.0	*Limit 5.0*	*Passed*	EPA Vendor ID: W12024
					Cylinder contains: O2,BALN

Linearity Error (LE) Determination

*LE (%) = (|R-A| / R) * 100*

R = Reference gas value

A = Mean of actual CEMS responses

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 4-Hr (Subpart KKKK)

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 4-Hr (Subpart KKKK) excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	16 hours, 48 minutes
Duration of NOx Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 55 minutes
Duration of NOx Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops NOx lbs 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops NOx lbs 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO ppm @15% O2 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO ppm @15% O2 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	16 hours, 48 minutes
Duration of CO Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 55 minutes
Duration of CO Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops CO lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops CO lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2

Reason	Duration
Quality Assurance (down)	2 hours
Source operating time	102 hours
Duration of NOx ppm @15% O2 monitor downtime	2 hours
Percent monitor downtime	2.0%
Source operating time with valid data	100 hours
Percent monitor availability	98.0%

2 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2

Parameter	Start	End	Duration	Reason	Action
NOx ppm @15% O2	7/6/2024 7:00 PM	7:59 PM	1 hour	Quality Assurance (down)	None
NOx ppm @15% O2	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
Total duration			2 hours		

2 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx lbs

Reason	Duration
Quality Assurance (down)	2 hours
Source operating time	102 hours
Duration of NOx lbs monitor downtime	2 hours
Percent monitor downtime	2.0%
Source operating time with valid data	100 hours
Percent monitor availability	98.0%

2 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: NOx lbs

Parameter	Start	End	Duration	Reason	Action
NOx lbs	7/6/2024 7:00 PM	7:59 PM	1 hour	Quality Assurance (down)	None
NOx lbs	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
Total duration			2 hours		

2 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO ppm @15% O2

Reason	Duration
Quality Assurance (down)	2 hours
Source operating time	102 hours
Duration of CO ppm @15% O2 monitor downtime	2 hours
Percent monitor downtime	2.0%
Source operating time with valid data	100 hours
Percent monitor availability	98.0%

2 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO ppm @15% O2

Parameter	Start	End	Duration	Reason	Action
CO ppm @15% O2	7/6/2024 7:00 PM	7:59 PM	1 hour	Quality Assurance (down)	None
CO ppm @15% O2	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
	Total duration		2 hours		

2 Midway CEMS Downtime Summary

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO lbs

Reason	Duration
Quality Assurance (down)	2 hours
Source operating time	102 hours
Duration of CO lbs monitor downtime	2 hours
Percent monitor downtime	2.0%
Source operating time with valid data	100 hours
Percent monitor availability	98.0%

2 Midway CEMS Downtime

Calpeak

CEMS Downtime for 7/1/2024 thru 9/30/2024: CO lbs

Parameter	Start	End	Duration	Reason	Action
CO lbs	7/6/2024 7:00 PM	7:59 PM	1 hour	Quality Assurance (down)	None
CO lbs	9/5/2024 5:00 PM	5:59 PM	1 hour	Quality Assurance (down)	Linearity
Total duration			2 hours		

Attachment 3

CEMS DAHS Excess Emission Reports

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 4-Hr (Subpart KKKK)

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 4-Hr (Subpart KKKK) excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	14 hours, 39 minutes
Duration of NOx Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/D

Reason	Duration
Startup / Shutdown (excess)	1 minute

Source operating time	5 hours, 28 minutes
Duration of NOx Lb/hr Per S/D excess emissions	1 minute
Source operating time with excess emissions	0.3%

1 Midway Excess Emissions

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/D

Parameter	Start	End	Duration	Value	Min	Max	Limit	Reason	Action
NOx Lb/hr Per S/D	7/2/2024 11:41 PM	11:41 PM	1 minute	3.19	3.19	3.19	3.00	Startup / Shutdown (excess)	None
Total duration			1 minute						

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops NOx lbs 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops NOx lbs 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: SOx Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	14 hours, 39 minutes
Duration of SOx Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: SOx Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 28 minutes
Duration of SOx Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops SOx lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops SOx lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: SOx lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of SOx lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO ppm @15% O2 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO ppm @15% O2 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	14 hours, 39 minutes
Duration of CO Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 28 minutes
Duration of CO Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops CO lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops CO lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: PM Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	14 hours, 39 minutes
Duration of PM Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: PM Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 28 minutes
Duration of PM Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops PM lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops PM lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: PM lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of PM lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NH3 Slip ppm @ 15% O2 24-Hr Rolling Avg

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NH3 Slip ppm @ 15% O2 24-Hr Rolling Avg excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: VOC Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	14 hours, 39 minutes
Duration of VOC Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: VOC Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 28 minutes
Duration of VOC Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops VOC lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops VOC lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

1 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: VOC lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of VOC lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx ppm @15% O2 4-Hr (Subpart KKKK)

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx ppm @15% O2 4-Hr (Subpart KKKK) excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	16 hours, 48 minutes
Duration of NOx Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 55 minutes
Duration of NOx Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops NOx lbs 1-Hr

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops NOx lbs 1-Hr excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NOx lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NOx lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: SOx Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	16 hours, 48 minutes
Duration of SOx Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: SOx Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 55 minutes
Duration of SOx Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops SOx lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops SOx lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: SOx lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of SOx lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO ppm @15% O2 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO ppm @15% O2 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	16 hours, 48 minutes
Duration of CO Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 55 minutes
Duration of CO Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops CO lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops CO lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: CO lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of CO lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: PM Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	16 hours, 48 minutes
Duration of PM Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: PM Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 55 minutes
Duration of PM Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops PM lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops PM lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: PM lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of PM lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: NH3 Slip ppm @ 15% O2 24-Hr Rolling Avg

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of NH3 Slip ppm @ 15% O2 24-Hr Rolling Avg excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: VOC Lb/hr Per S/U

Reason	Duration
There are no excess emissions for this report.	

Source operating time	16 hours, 48 minutes
Duration of VOC Lb/hr Per S/U excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: VOC Lb/hr Per S/D

Reason	Duration
There are no excess emissions for this report.	

Source operating time	5 hours, 55 minutes
Duration of VOC Lb/hr Per S/D excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: Normal Ops VOC lbs 3-Hr Rolling

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of Normal Ops VOC lbs 3-Hr Rolling excess emissions	0
Source operating time with excess emissions	0.0%

2 Midway Excess Emissions Summary

Calpeak

Excess Emissions for 7/1/2024 thru 9/30/2024: VOC lbs/Day

Reason	Duration
There are no excess emissions for this report.	

Source operating time	102 hours
Duration of VOC lbs/Day excess emissions	0
Source operating time with excess emissions	0.0%

Attachment 4

Unit Operating Hours

Midway Peaking, LLC

Firebaugh, CA

Midway Condition 17

2024

Quarter	Limit
1	800
2	800
3	1400
4	1000

Limit is per Turbine

	Unit 1A	Unit 1B	Unit 2A	Unit 2B
Month	CT-A Nat Gas On-Time Monthly Total	CT-B Nat Gas On-Time Monthly Total	CT-A Nat Gas On-Time Monthly Total	CT-B Nat Gas On-Time Monthly Total
01 2024	18.6	18.4	18.5	18.4
02 2024	8.3	6.3	6.6	6.5
03 2024	0.0	0.0	0.0	0.0
04 2024	1.5	1.3	6.3	3.6
05 2024	17.1	4.9	3.4	1.4
06 2024	11.6	10.5	9.5	8.3
07 2024	48.3	47.0	46.9	46.1
08 2024	13.1	12.9	13.7	13.2
09 2024	10.8	10.5	10.9	10.5
10 2024	32.0	31.4	27.8	28.2
11 2024	**Inval**	**Inval**	**Inval**	**Inval**
12 2024	**Inval**	**Inval**	**Inval**	**Inval**
Total	161	143	144	136

Attachment 5

Annual Emissions Summary

Midway Peaking, LLC

Firebaugh, CA

Midway Condition 18 and 19 U1

September 2024 12-Month Rolling

Parameter	Limit lb/yr per Turbine	Limit lb/yr perUnit	Limit lb/yr for Facility
NOx	12,736	25,742	50,000
CO	18,826	37,652	
VOC	3,281	6,562	
PM10	7,400	14,800	
SOx	3,560	7,120	

Month	CT-A NOx lbs 12-Month Rolling Total	CT-B NOx lbs 12-Month Rolling Total	CT-A CO lbs 12-Month Rolling Total	CT-B CO lbs 12-Month Rolling Total	CT-A VOC lbs 12-Month Rolling Total	CT-B VOC lbs 12-Month Rolling Total	CT-A PM lbs 12-Month Rolling Total	CT-B PM lbs 12-Month Rolling Total	CT-A SOx lbs 12-Month Rolling Total	CT-B SOx lbs 12-Month Rolling Total
10 2023	760	848	748	802	53	59	255	281	67	73
11 2023	739	825	708	762	51	58	248	276	65	72
12 2023	583	665	523	572	39	46	189	217	50	57
01 2024	551	625	488	536	37	44	180	207	48	54
02 2024	578	601	455	491	35	40	171	191	46	50
03 2024	519	504	390	412	30	32	149	154	40	41
04 2024	347	328	251	263	19	20	94	97	25	26
05 2024	392	343	260	264	23	20	110	100	29	26
06 2024	424	371	271	273	24	21	118	107	31	28
07 2024	560	500	371	370	32	29	156	146	40	38
08 2024	580	521	381	380	33	30	159	149	40	38
09 2024	622	562	404	402	35	32	170	160	43	41

Midway Peaking, LLC

Firebaugh, CA

Midway Condition 18 and 19 U2

September 2024 12-Month Rolling

Parameter	Limit lb/yr per turbine	Limit lb/yr per Unit	Limit lb/yr for Facility
NOx	12,736	25,742	50,000
CO	18,826	37,652	
VOC	3,281	6,562	
PM10	7,400	14,800	
SOx	3,560	7,120	

Month	CT-A NOx lbs 12-Month Rolling Total	CT-B NOx lbs 12-Month Rolling Total	CT-A CO lbs 12-Month Rolling Total	CT-B CO lbs 12-Month Rolling Total	CT-A VOC lbs 12-Month Rolling Total	CT-B VOC lbs 12-Month Rolling Total	CT-A PM lbs 12-Month Rolling Total	CT-B PM lbs 12-Month Rolling Total	CT-A SOx lbs 12-Month Rolling Total	CT-B SOx lbs 12-Month Rolling Total
10 2023	754	704	949	853	32	31	245	224	82	76
11 2023	738	695	914	828	32	31	239	221	80	75
12 2023	596	560	708	631	25	24	190	174	64	59
01 2024	533	515	607	577	21	22	163	160	55	54
02 2024	497	501	555	546	20	21	151	153	52	52
03 2024	377	387	410	413	15	16	112	115	39	39
04 2024	260	254	283	275	11	10	76	75	27	26
05 2024	266	250	277	267	11	10	77	74	27	25
06 2024	300	284	296	282	12	11	82	79	28	26
07 2024	438	441	402	388	16	15	112	111	38	36
08 2024	480	478	425	409	16	15	118	117	40	38
09 2024	511	510	449	431	17	16	127	126	43	41

Attachment 6

Startup/Shutdown Duration

1 Midway Events

Calpeak
for 7/1/2024 thru 9/30/2024

Parameter	Start	End	Duration	Value
Startup	7/1/2024 6:24 PM	6:46 PM	0.38	
Shutdown	7/1/2024 7:29 PM	7:38 PM	0.17	
Startup	7/2/2024 6:26 PM	6:51 PM	0.43	
Shutdown	7/2/2024 9:02 PM	9:11 PM	0.17	
Startup	7/2/2024 10:25 PM	10:44 PM	0.33	
Shutdown	7/2/2024 11:31 PM	11:40 PM	0.17	
Startup	7/3/2024 6:38 PM	7:01 PM	0.40	
Shutdown	7/3/2024 7:48 PM	7:57 PM	0.17	
Startup	7/5/2024 6:08 PM	6:30 PM	0.38	
Shutdown	7/5/2024 7:17 PM	7:26 PM	0.17	
Startup	7/6/2024 6:09 PM	6:34 PM	0.43	
Shutdown	7/6/2024 7:17 PM	7:26 PM	0.17	
Startup	7/7/2024 6:24 PM	6:45 PM	0.37	
Shutdown	7/7/2024 7:31 PM	7:40 PM	0.17	
Startup	7/8/2024 5:10 PM	5:38 PM	0.48	
Shutdown	7/8/2024 7:32 PM	7:41 PM	0.17	
Startup	7/9/2024 4:25 PM	4:50 PM	0.43	
Shutdown	7/9/2024 8:14 PM	8:22 PM	0.15	
Startup	7/10/2024 5:08 PM	5:30 PM	0.38	
Shutdown	7/10/2024 7:32 PM	7:41 PM	0.17	
Startup	7/11/2024 5:24 PM	5:45 PM	0.37	
Shutdown	7/11/2024 7:32 PM	7:41 PM	0.17	
Startup	7/16/2024 6:27 PM	6:49 PM	0.38	
Shutdown	7/16/2024 7:31 PM	7:40 PM	0.17	
Startup	7/19/2024 5:40 PM	6:10 PM	0.52	

Parameter	Start	End	Duration	Value
Shutdown	7/19/2024 7:47 PM	7:56 PM	0.17	
Startup	7/20/2024 5:24 PM	5:48 PM	0.42	
Shutdown	7/20/2024 7:17 PM	7:25 PM	0.15	
Startup	7/23/2024 4:26 PM	4:51 PM	0.43	
Shutdown	7/23/2024 9:33 PM	9:43 PM	0.18	
Startup	7/24/2024 1:24 PM	1:46 PM	0.38	
Shutdown	7/24/2024 3:02 PM	3:11 PM	0.17	
Startup	7/24/2024 4:38 PM	4:57 PM	0.33	
Shutdown	7/24/2024 9:01 PM	9:10 PM	0.17	
Startup	7/25/2024 4:25 PM	4:51 PM	0.45	
Shutdown	7/25/2024 8:17 PM	8:26 PM	0.17	
Startup	7/26/2024 12:44 PM	12:50 PM	0.12	
Startup	7/29/2024 6:07 PM	6:32 PM	0.43	
Shutdown	7/29/2024 7:18 PM	7:26 PM	0.15	
Startup	7/30/2024 5:37 PM	6:05 PM	0.48	
Shutdown	7/30/2024 7:32 PM	7:40 PM	0.15	
Startup	7/31/2024 5:41 PM	6:08 PM	0.47	
Shutdown	7/31/2024 7:17 PM	7:25 PM	0.15	
Startup	8/1/2024 3:28 PM	3:53 PM	0.43	
Shutdown	8/1/2024 7:31 PM	7:40 PM	0.17	
Startup	8/2/2024 1:06 PM	1:30 PM	0.42	
Shutdown	8/2/2024 3:04 PM	3:12 PM	0.15	
Startup	8/2/2024 5:37 PM	6:00 PM	0.40	
Shutdown	8/2/2024 6:47 PM	6:56 PM	0.17	
Startup	8/5/2024 6:25 PM	6:51 PM	0.45	
Shutdown	8/5/2024 7:32 PM	7:40 PM	0.15	
Startup	8/6/2024 6:07 PM	6:30 PM	0.40	

Parameter	Start	End	Duration	Value
Shutdown	8/6/2024 7:17 PM	7:25 PM	0.15	
Startup	8/13/2024 6:07 PM	6:31 PM	0.42	
Shutdown	8/13/2024 7:16 PM	7:25 PM	0.17	
Startup	8/15/2024 5:50 PM	6:21 PM	0.53	
Shutdown	8/15/2024 7:17 PM	7:25 PM	0.15	
Startup	8/16/2024 7:24 AM	7:30 AM	0.12	
Startup	9/3/2024 5:23 PM	5:48 PM	0.43	
Shutdown	9/3/2024 6:32 PM	6:40 PM	0.15	
Startup	9/4/2024 5:37 PM	6:01 PM	0.42	
Shutdown	9/4/2024 7:03 PM	7:11 PM	0.15	
Startup	9/5/2024 4:25 PM	4:50 PM	0.43	
Shutdown	9/5/2024 6:48 PM	6:56 PM	0.15	
Startup	9/6/2024 5:37 PM	6:02 PM	0.43	
Shutdown	9/6/2024 6:46 PM	6:55 PM	0.17	
Startup	9/7/2024 5:23 PM	5:51 PM	0.48	
Shutdown	9/7/2024 6:32 PM	6:40 PM	0.15	
Startup	9/8/2024 5:07 PM	5:34 PM	0.47	
Shutdown	9/8/2024 7:46 PM	7:55 PM	0.17	

2 Midway Events

Calpeak
for 7/1/2024 thru 9/30/2024

Parameter	Start	End	Duration	Value
Startup	7/1/2024 6:24 PM	6:49 PM	0.43	
Shutdown	7/1/2024 7:30 PM	7:38 PM	0.15	
Startup	7/2/2024 6:26 PM	6:58 PM	0.55	
Shutdown	7/2/2024 9:02 PM	9:11 PM	0.17	
Startup	7/2/2024 10:26 PM	10:47 PM	0.37	
Shutdown	7/2/2024 11:32 PM	11:40 PM	0.15	
Startup	7/3/2024 6:38 PM	7:00 PM	0.38	
Shutdown	7/3/2024 7:48 PM	7:57 PM	0.17	
Startup	7/5/2024 6:09 PM	6:33 PM	0.42	
Shutdown	7/5/2024 7:17 PM	7:26 PM	0.17	
Startup	7/6/2024 6:09 PM	6:34 PM	0.43	
Shutdown	7/6/2024 7:28 PM	7:36 PM	0.15	
Startup	7/7/2024 6:24 PM	6:45 PM	0.37	
Shutdown	7/7/2024 7:31 PM	7:40 PM	0.17	
Startup	7/8/2024 5:09 PM	5:34 PM	0.43	
Shutdown	7/8/2024 7:32 PM	7:41 PM	0.17	
Startup	7/9/2024 4:25 PM	4:51 PM	0.45	
Shutdown	7/9/2024 8:14 PM	8:23 PM	0.17	
Startup	7/10/2024 5:08 PM	5:32 PM	0.42	
Shutdown	7/10/2024 7:32 PM	7:41 PM	0.17	
Startup	7/11/2024 5:24 PM	5:48 PM	0.42	
Shutdown	7/11/2024 7:32 PM	7:41 PM	0.17	
Startup	7/16/2024 6:27 PM	6:49 PM	0.38	
Shutdown	7/16/2024 7:41 PM	7:49 PM	0.15	
Startup	7/19/2024 5:40 PM	6:10 PM	0.52	

Parameter	Start	End	Duration	Value
Shutdown	7/19/2024 7:47 PM	7:55 PM	0.15	
Startup	7/20/2024 5:25 PM	5:47 PM	0.38	
Shutdown	7/20/2024 7:17 PM	7:25 PM	0.15	
Startup	7/23/2024 4:26 PM	4:50 PM	0.42	
Shutdown	7/23/2024 5:37 PM	5:46 PM	0.17	
Startup	7/23/2024 8:08 PM	8:26 PM	0.32	
Shutdown	7/23/2024 9:34 PM	9:43 PM	0.17	
Startup	7/24/2024 1:24 PM	1:49 PM	0.43	
Shutdown	7/24/2024 3:02 PM	3:11 PM	0.17	
Startup	7/24/2024 4:38 PM	5:00 PM	0.38	
Shutdown	7/24/2024 9:02 PM	9:10 PM	0.15	
Startup	7/25/2024 4:26 PM	4:46 PM	0.35	
Shutdown	7/25/2024 8:17 PM	8:26 PM	0.17	
Startup	7/29/2024 6:07 PM	6:37 PM	0.52	
Shutdown	7/29/2024 7:18 PM	7:26 PM	0.15	
Startup	7/30/2024 5:37 PM	6:01 PM	0.42	
Shutdown	7/30/2024 7:32 PM	7:40 PM	0.15	
Startup	7/31/2024 6:39 AM	7:34 AM	0.93	
Shutdown	7/31/2024 7:45 AM	7:53 AM	0.15	
Startup	7/31/2024 5:41 PM	6:13 PM	0.55	
Shutdown	7/31/2024 7:17 PM	7:26 PM	0.17	
Startup	8/1/2024 3:28 PM	3:51 PM	0.40	
Shutdown	8/1/2024 7:31 PM	7:40 PM	0.17	
Startup	8/2/2024 1:06 PM	1:30 PM	0.42	
Shutdown	8/2/2024 3:04 PM	3:13 PM	0.17	
Startup	8/2/2024 5:37 PM	6:00 PM	0.40	
Shutdown	8/2/2024 6:48 PM	6:56 PM	0.15	

Parameter	Start	End	Duration	Value
Startup	8/5/2024 6:25 PM	6:54 PM	0.50	
Startup	8/6/2024 6:07 PM	6:42 PM	0.60	
Shutdown	8/6/2024 7:17 PM	7:26 PM	0.17	
Startup	8/13/2024 6:07 PM	6:30 PM	0.40	
Shutdown	8/13/2024 7:16 PM	7:25 PM	0.17	
Startup	8/15/2024 5:50 PM	6:20 PM	0.52	
Shutdown	8/15/2024 7:17 PM	7:25 PM	0.15	
Startup	8/16/2024 2:46 PM	3:13 PM	0.47	
Shutdown	8/16/2024 3:18 PM	3:26 PM	0.15	
Startup	8/16/2024 4:11 PM	4:28 PM	0.30	
Shutdown	8/16/2024 4:39 PM	4:48 PM	0.17	
Startup	9/3/2024 5:23 PM	5:43 PM	0.35	
Shutdown	9/3/2024 6:32 PM	6:41 PM	0.17	
Startup	9/4/2024 5:37 PM	6:06 PM	0.50	
Shutdown	9/4/2024 7:03 PM	7:12 PM	0.17	
Startup	9/5/2024 4:25 PM	4:49 PM	0.42	
Shutdown	9/5/2024 6:48 PM	6:56 PM	0.15	
Startup	9/6/2024 5:37 PM	6:00 PM	0.40	
Shutdown	9/6/2024 6:47 PM	6:55 PM	0.15	
Startup	9/7/2024 5:23 PM	5:48 PM	0.43	
Shutdown	9/7/2024 6:32 PM	6:41 PM	0.17	
Startup	9/8/2024 5:07 PM	5:32 PM	0.43	
Shutdown	9/8/2024 7:46 PM	7:55 PM	0.17	

Attachment 7

Acid Rain Program Final Compliance Summary

CAMD Business System
Clean Air Markets Division

Detailed Compliance Report

Allowance Deductions for Compliance Year 2023 Acid Rain Program

Primary Representative

Claude Couvillion

Alternate Representative

Jon Boyer

Account Name

Midway Peaking

Account Number

056639FACLTY

Program

Acid Rain Program

Beginning Balance

0

SO2 Emissions (tons)

0

Excess Emissions (tons)

0

Ending Balance

0


EPA
United States
Environmental Protection
Agency