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Document Title:	Blythe Energy Project - Petition to Amend AQ - 20170907
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Filer:	Mary Dyas
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September 5, 2017

Ms. Mary Dyas, Compliance Project Manager California Energy Commission 1516 Ninth Street Sacramento, CA 95814-5512

Re: Blythe Energy Project (99-AFC-08C) Petition to Amend

Dear Ms. Dyas:

Enclosed please find Blythe Energy Inc.'s Petition to Amend ("PTA") for the Blythe Energy Project, 99-AFC-08C ("BEP"). The amendment proposed by this PTA would modify one Condition of Certification and eliminate another to ensure consistency with proposed changes to the Mojave Desert Air Quality Management District ("MDAQMD") permits.¹ The proposed amendment would not result in any environmental impacts or inconsistency with any applicable Laws, Ordinances, Regulations, or Standards ("LORS"). In fact, after approval of the amendment, maximum allowable CO emissions from BEP will remain well below those evaluated in the original licensing proceeding.

If you have any questions or require additional information regarding this PTA, please do not hesitate to contact Nancy Matthews of Sierra Research at (916) 444-6666 or Melissa Foster of Stoel Rives LLP at (916) 447-0700.

Respectfully submitted,

Peter Ledig Vice President

cc: Nancy Matthews, Sierra Research Melissa Foster, Stoel Rives LLP

¹ An application for changes to the facility air permits was submitted to the MDAQMD on September 5, 2017, a copy of which is provided as Appendix A to the PTA.



PETITION TO AMEND

Blythe Energy Inc.

Blythe Energy Project Docket Number 99-AFC-08C

Prepared by:

Sierra Research

A Trinity Consultants Company 1801 J Street Sacramento, CA 95811 916-444-6666

September 2017





Environmental solutions delivered uncommonly well

Petition to Amend Blythe Energy Project

prepared for:

Blythe Energy Inc.

Submitted to:

California Energy Commission

September 2017

Prepared by

Sierra Research, Inc. 1801 J Street Sacramento, CA 95811 (916) 444-6666

Petition to Amend Blythe Energy Project

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ACRONYMS AND ABBREVIATIONS

- AFC Application for Certification
- BEP Blythe Energy Project
- CEC California Energy Commission
- CO carbon monoxide
- COC Condition of Certification
- LORS Laws, Ordinances, Regulations, and Standards
- MDAQMD Mojave Desert Air Quality Management District
- MW megawatt

1. INTRODUCTION

1.1 Background

The Blythe Energy Project (BEP or Project) is a nominal 520-megawatt (MW) combined-cycle power plant located in the City of Blythe, north of Interstate 10 and approximately 7 miles west of the California/Arizona border. The California Energy Commission (CEC) issued a license for Blythe Energy Inc.'s (Blythe Energy) BEP on March 21, 2001. Commercial operations for the plant began in July 2003. The Project was acquired by AltaGas Power Holdings (U.S.) Inc. in 2013.

BEP was originally licensed as a major source of air emissions, with allowable NOx. CO and PM_{10} emissions of 202, 621 and 103 tons per year (tpy), respectively.¹ Starting in 2014, the emissions limits for BEP were reduced in two steps for two different regulatory purposes. In the first step, permitted emissions of NOx, CO, and PM_{10} were reduced from their originally permitted levels to 97 tons per year to more closely reflect actual emissions performance. This made BEP a minor source for air regulatory purposes, which helped streamline the air quality permitting process for AltaGas's proposed Sonoran Energy Project (Sonoran), which was considered part of the same stationary source under the applicable air regulations. In the second step, permitted emissions of SO₂ and PM₁₀ were reduced at the same time the MDAQMD issued Authorities to Construct for the proposed Sonoran project, allowing AltaGas to create simultaneous emissions reductions that could be used to offset proposed increases in emissions at Sonoran that would have otherwise required the purchase of emission reduction credits (ERCs). The new, lower emission limits for BEP were adequate to accommodate the operating scenarios anticipated for the facility by AltaGas at the time the changes were made because of the expectation that the proposed Sonoran project would be licensed and become operational. When the MDAQMD issued permits to construct for the proposed Sonoran Energy Project, the permits included limits on total emissions from both BEP and Sonoran as a single stationary source. Finally, in May 2017, BEP completed implementation of the turndown upgrades to the gas turbines as authorized by the January 17, 2015, CEC staff-approved project modification (TN#203503). The turndown upgrades increase BEP's ability to provide additional ancillary services and enable the units to be much more flexible to meet CAISO's grid needs and integrate renewable resources.

AltaGas has withdrawn its petition seeking to license the Sonoran Energy Project. Since AltaGas no longer plans to develop Sonoran, the expected operating schedule for the BEP gas turbines is somewhat different than previously planned. BEP is now expected to be called upon by the CAISO to start up more frequently and to operate

¹ BEP was a major source because potential emissions of at least one criteria pollutant exceeded 100 tpy. Potential emissions of SOx and VOC were below 100 tpy.

more often. As a result, AltaGas is concerned that the current annual CO limit in BEP's permits could restrict BEP's ability to operate as needed. AltaGas would like to increase the current annual CO emissions limit at BEP (97 tons per year) to the current combined level for both facilities (175 tons per year) to enhance operational flexibility. The purpose of this proposed amendment is to increase the facility-wide annual emission limits for carbon monoxide (CO) from the currently licensed limit to reflect the expected future emissions from the facility compared to the previously permitted emissions. No change in the annual fuel use limit is being requested, and, therefore there would be no increase in greenhouse gas emissions above levels previously analyzed by the CEC as a result of the proposed amendment.

The amendment proposed by this petition would revise the BEP Conditions of Certification (COC) by modifying one condition and eliminating another to make them consistent with the proposed changes to the Mojave Desert Air Quality Management District (MDAQMD) permits. However, the proposed amendment would not result in any environmental impacts or inconsistency with any applicable Laws, Ordinances, Regulations, or Standards (LORS). In fact, after approval of the amendment, maximum allowable CO emissions from the BEP project will remain well below those evaluated in the original licensing proceeding.

An application for changes to the facility air permits was submitted to the MDAQMD on September 5, 2017. A copy of the application is provided as Appendix A.

<u>1.2</u> Description of Proposed Amendment

Consistent with Sections 1769(a)(1)(A) and (B) of the Siting Regulations, this section includes a complete description of the proposed change as well as the necessity for the change.

BEP is composed of two Siemens F Class V84.3A (2) gas turbines with duct-fired heat recovery steam generators, a single condensing steam turbine, two wet cooling towers, and associated plant equipment. In 2005, the CEC granted a license to Caithness Blythe II, LLC, to construct and operate the Blythe Energy Project Phase II (BEP II), adjacent to BEP. As licensed, BEP II was a 569-megawatt (MW), combined-cycle power plant. In August 2015, AltaGas Sonoran Energy Inc. submitted a Petition to Amend the Final Decision for Blythe Energy Project Phase II (02-AFC-1C), requesting approval to modify the project design to reflect new generating technology as well as for other changes, and to change the project name to Sonoran Energy Project (Sonoran). On August 11, 2017, AltaGas Sonoran Energy Inc. withdrew the Sonoran Petition to Amend.

Now that AltaGas no longer plans to develop Sonoran, the expected operating schedule for BEP is somewhat different than previously planned. BEP is now expected to be called upon by the CAISO to start up more frequently and to operate more often. As a result, AltaGas is concerned that the current annual CO limit could restrict BEP's ability to operate as needed. The purpose of this proposed amendment is to increase the allowable annual CO emissions from BEP so that the potential to emit is equal to the current combined CO limit for both BEP and Sonoran. The amendment will also eliminate the condition in the BEP license that refers to Sonoran, since Sonoran will not be developed.

The proposed amendment will have no additional impacts beyond those identified in the original Commission Decision for the BEP. Maximum allowable CO emissions from the BEP project will remain well below those evaluated in the original licensing proceeding.

<u>1.3</u> Necessity of Proposed Changes

Sections 1769 (a)(1)(B) and (C) of the CEC Siting Regulations (20 Cal. Code Reg. §§ 1701 et seq.) require a discussion of the necessity for the proposed changes to the Project and a discussion of whether this amendment is based on information that was known by the petitioner during the certification proceeding.

Blythe Energy is requesting this change because of the expected change in future BEP operational requirements following the decision by AltaGas Sonoran Inc. to withdraw the Sonoran project. The elimination of Sonoran as a potential generating resource may result in increased future operation of the BEP gas turbines, including the need to start up more often. The proposed increase in the annual CO limit to the level previously allocated to BEP and Sonoran together will ensure that BEP is able to operate as needed under the anticipated demand scenario without an overall increase in total CO emissions. The requested amendment would also eliminate a COC that became obsolete when the Sonoran petition was withdrawn.

<u>1.4</u> Summary of Environmental Impacts

Section 1769 (a)(1)(E) of the CEC Siting Regulations requires that an analysis be conducted to address impacts that the proposed revision may have on the environment and proposed measures to mitigate significant adverse impacts. Section 1769 (a)(1)(F) requires a discussion of the impacts of proposed revisions on the facility's ability to comply with applicable LORS.

The proposed changes referenced in this Petition will not result in any additional impacts beyond those already analyzed in the Commission Decision or the Final Determination of Compliance. Section 2.0 discusses the potential impacts of the proposed changes on the environment, as well as the consistency of the proposed revision with LORS.

1.5 Consistency of Amendment with License

Section 1769 (a)(1)(D) of the CEC Siting Regulations requires a discussion of the consistency of each proposed project revision with the assumptions, rationale, findings, or other basis of the Commission Decision and whether the revision is based on new information that changes or undermines the bases of the Commission Decision. Also required is an explanation of why the change should be permitted.

The proposed amendment does not undermine the assumptions, rationale, findings, or other basis of the Commission Decision for the Project. After the proposed amendment, maximum allowable emissions from BEP will remain at levels well below the limits in the original license, thereby keeping air quality impacts below those

analyzed in the original licensing proceeding. The proposed amendment will have no additional impacts beyond those analyzed in the Commission Decision for the BEP.

2. ENVIRONMENTAL ANALYSIS OF THE PROJECT CHANGES

Blythe Energy has reviewed the amendment proposed herein to determine whether the change will result in any environmental impacts that were not originally analyzed by the CEC when it approved BEP.

The following disciplines will not be affected by the proposed change in this amendment and are not addressed below: Facility Design, Efficiency, Reliability, Transmission System Engineering, Transmission Line Safety and Nuisance, Biological Resources, Cultural Resources, Geologic Hazards and Resources, Hazardous Materials Handling, Land Use, Noise, Paleontological Resource, Socioeconomics, Soils, Traffic and Transportation, Visual Resources, Waste Management, Water Resources, Worker Safety and Fire Protection. In addition, although Air Quality related amendments typically have the potential to affect Public Health impacts, the proposed revised emission limits are reduced from those originally licensed and impacts will be not be greater than those previously analyzed by the CEC for BEP; therefore, Public Health is not addressed further. The only discipline that could be affected by the proposed amendment is Air Quality, which is discussed in detail below.

The proposed amendment does not cause significant impacts in any disciplines beyond those analyzed in the Commission Decision for BEP.

2.1 Air Quality

Blythe Energy proposes to increase the existing facility-wide annual mass emissions limit for CO to equal the combined total CO limit currently applicable to BEP and Sonoran.

Although the proposed changes in emissions limits will not involve any physical changes to the gas turbines, they reflect a change in the method of operation and are therefore considered a modification under District regulations. The changes will not affect any short-term emission limits or limits for pollutants other than CO. Since the proposed amendment will change the annual CO mass emission limits, as well as eliminate a COC related to the Sonoran project that will no longer be developed, minor edits to COC AQ-T7 and elimination of AQ-T7a are necessary.

The permit amendment application to the Mojave Desert Air Quality Management District is provided as Appendix A.

2.1.1 Annual CO Emissions Limits

The current annual CO limit for BEP is based on the facility's expected operations with the Sonoran Energy Center in operation as well. Without Sonoran, BEP is expected to be called upon to start up and operate more than previously anticipated. CO emissions from the gas turbines are highest during startups, so the increased number of startups is expected to result in higher annual CO emissions from the facility. Therefore, Blythe Energy is proposing to increase the annual CO limit in the gas turbine Permits to Operate to provide more flexibility for anticipated gas turbine demand.

Blythe Energy is proposing to increase the annual limits for CO to the limit shown below, with compliance to be determined on a 12-month rolling total basis. Table 1 summarizes the requested increase in permitted annual CO emissions. The new annual CO limit of 175 tons per year at BEP will be equal to the sum of the previous CO limits at BEP and Sonoran, but will remain well below the annual CO limit of 621 tons per year in the original BEP license.

BEP is currently a minor source, with emissions of all criteria pollutants from BEP below PSD major stationary source thresholds (40 CFR 52.21 (b)(1)(i)(c)), as shown in Table 1

Proposed Change in Permitted Annual CO Emissions. The proposed increase in emissions is also below the PSD major stationary source thresholds, so the proposed modification will not be subject to PSD review.

Table 1 Proposed Change in Permitted Annual CO Emissions				
CO Emissions, tons per year				
Proposed permit limit	175			
Current permit limit	97			
Net change	78			
PSD major stationary source threshold	100			
Limit in original BEP license	621			

2.1.2 <u>Combined Emissions Limits for BEP and Sonoran</u>

The air quality COCs in the CEC license for BEP include limitations on combined emissions from BEP and the planned Sonoran Energy Project. Since the Sonoran Petition to Amend has been withdrawn and Sonoran will no longer be developed, there is no longer a need for those limitations.

2.1.3 Mitigation

No significant impacts beyond those previously described in the Commission Decision for the BEP would result from the approval of this amendment. Therefore, additional mitigation measures beyond those found in the Commission Decision for BEP are not necessary; however, a minor edit to COC AQ-T7 is necessary, as is deletion of COC AQ-T7a in its entirety as it is no longer relevant in light of the withdrawal of the Sonoran petition.

2.1.4 <u>Consistency with Laws, Ordinances, Regulations, and Standards</u>

The Commission Decision for BEP found the facility to be in compliance with all applicable LORS. As amended, the BEP will continue to comply with all applicable LORS and does not alter the conclusions or assumptions in the Commission Decision.

2.1.5 <u>Conditions of Certification</u>

Consistent with the requirements of the CEC Siting Regulations Section 1769 (a)(1)(A), this section addresses the proposed amendments to the Project's Conditions of Certification.

Blythe Energy proposes to modify the allowable annual CO emissions and to eliminate the COC referencing the Sonoran project in the BEP license as amended by Order dated June 17, 2016. The proposed revisions to Conditions of Certification AQ-T7 and AQ-T7a are shown in strikeout and **bold <u>underline</u>** font. Only the modified conditions are shown.

AQ-T7 Emissions from this facility, including the cooling towers, shall not exceed the following emission limits, based on a rolling 12 month summary:

- a. NOx -97 tons/year, verified by CEMS.
- b. CO -97 175 tons/year, verified by CEMS.
- c. VOC as CH4 24 tons/year, verified by compliance tests and hours of operation in mode.
- d. SOx as SO2 12 tons/year, verified by fuel sulfur content and fuel use data.
- e. PM10 —56.9 tons/year, verified by compliance tests and hours of operation.

These limits shall apply to all emissions from all units at this facility, and shall include emissions during all modes of operation, including startup, shutdown and malfunction.

Verification: The project owner shall submit the following in each Quarterly Operations Report: All continuous emissions data reduced and reported in accordance with the District approved CEMS protocol; a list of maximum hourly, maximum daily, total quarterly, and total calendar year emissions of NOx, CO, PM10, VOC and SOx (including calculation protocol); a log of all excess emissions, including the information regarding malfunctions/ breakdowns required by District Rule 430; operating parameters of emission control equipment, including but not limited to ammonia injection rate, NOx emission rate and ammonia slip; any maintenance to any air pollutant control system (recorded on an as-performed basis); and any permanent changes made in the plant process or production that could affect air pollutant emissions, and when the changes were made.

AQ-T7a Emissions from all permit units at the Blythe Energy Project, when combined with the emissions from all permitted units located at the adjacent Sonoran Energy Project, shall not exceed the following emission limits, based on a rolling 12 month summary:

- a. NOx 182.6 tons/year, verified by CEMS
- b. CO 175 tons/year, verified by CEMS
- c. VOC as CH4 48.3 tons/year, verified by compliance tests and hours of operation in steady-state, pre-mix mode
- d. SOx as SO2 20.8 tons/year, verified by fuel sulfur content and fuel use data
- e. PM10 97 tons/year, verified by compliance tests and hours of operation

These limits shall include emissions during all modes of operation, including startup, shutdown and malfunction. (NOTE: Pursuant to Regulation XIII the District considers the Blythe Energy Project and the Sonoran Energy Project to be one facility. Each of these projects has been separately certified by the Energy Commission pursuant to Public Resources Code Section 25500.)

Verification: See Verification of AQ-T7.

3. POTENTIAL EFFECTS ON THE PUBLIC AND PROPERTY OWNERS

This section addresses potential effects of the proposed project amendment on nearby property owners, the public, and parties in the application proceeding, pursuant to CEC Siting Regulations (Title 20, CCR, Section 1769 [a][1][I]).

The proposed amendment will not differ in potential effects on nearby property owners, the Public, and Parties to the proceeding beyond those previously analyzed.

4. LIST OF PROPERTY OWNERS

A list of property owners potentially affected by this amendment is provided with this Petition. The list of property owners within 1,000 feet of the project site is provided as Appendix B.

APPENDIX A

Application for a Permit Amendment for the Blythe Energy Project Provided to the Mojave Desert Air Quality Management District



September 5, 2017

Brad Poiriez, Executive Officer Mojave Desert Air Quality Management District 14306 Park Avenue Victorville, CA 92392-2310

Subject: Blythe Energy Project MDAQMD Federal Operating Permit 130202262

Dear Mr. Poiriez:

Blythe Energy Inc. (Blythe Energy), a wholly owned subsidiary of AltaGas Power Holdings (U.S.), is pleased to submit the attached application for modifications to the Permits to Operate and the Federal Operating Permit for the Blythe Energy Project (BEP). The required application forms are included as Appendix A, and a check for the \$538 filing fee is enclosed. With this permit application, AltaGas Sonoran Energy Inc. is also submitting a request to cancel the authorities to construct for the Sonoran Energy Project (Sonoran) that were issued by the District in 2016, as AltaGas no longer plans to develop Sonoran. The proposed modification to the BEP permits proposes to increase allowable annual emissions of CO from BEP from 97 tons per year to 175 tons per year, the combined total annual CO potential to emit for BEP and Sonoran. This will give BEP additional project operating flexibility to meet changing electrical grid demands in the absence of Sonoran. The application would also eliminate the conditions in the BEP permits that refer to Sonoran, since Sonoran will not be developed.

The District determined in the FDOC and subsequent amendments that BEP as permitted would be in compliance with District regulations, including prohibitory rules. BEP is not proposing any changes to the project that would change this determination. Therefore, continued compliance with all applicable District rules and regulations is expected.

We appreciate your consideration of our request. If you have any questions or require additional information regarding the proposed amendments, please do not hesitate to contact Nancy Matthews of Sierra Research at (916) 273-5124.

Sincerely,

Peter Ledig Vice President Blythe Energy Inc.

Attachments

cc: Mary Dyas, California Energy Commission Lisa Beckham, EPA Region IX Allison Smith, Stoel Rives Nancy Matthews, Sierra Research

APPLICATION FOR A PERMIT AMENDMENT

Blythe Energy Inc.

Blythe Energy Project MDAQMD Facility ID 2262 CEC Docket Number 99-AFC-08C

Prepared by:

Sierra Research

A Trinity Consultants Company 1801 J Street Sacramento, CA 95811 916-444-6666

September 2017





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Application for a Permit Amendment for the Blythe Energy Project

Prepared for:

Blythe Energy Inc.

Submitted to:

Mojave Desert Air Quality Management District

September 2017

Prepared by

Sierra Research, Inc. 1801 J Street Sacramento, CA 95811 (916) 444-6666

Application for a Permit Amendment for the Blythe Energy Project

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Appendix A – Permit Application Forms

Application for a Permit Amendment for the Blythe Energy Project

1. Introduction

Blythe Energy Project (BEP or Project) is a nominal 520-megawatt (MW) combinedcycle power plant, composed of two Siemens F Class V84.3A(2) gas turbines with duct-fired heat recovery steam generators (HRSG), a single condensing steam turbine, two wet cooling towers, and associated plant equipment. BEP is located in the City of Blythe, north of Interstate 10 and approximately 7 miles west of the California/Arizona border.

A Final Determination of Compliance for BEP was issued by the Mojave Desert Air Quality Management District (District) on October 26, 2000. The California Energy Commission (CEC) issued a license to Blythe Energy Inc. (Blythe Energy) for the project on March 21, 2001. Commercial operations for the plant began in July 2003. The District approved the installation of oxidation catalysts on the gas turbines as an administrative modification on April 8, 2010. The Project was acquired by AltaGas Power Holdings (U.S.) Inc. in 2013.

BEP was originally permitted as a major source¹ of air emissions, with allowable NOx. CO and PM_{10} emissions of 202, 621 and 103 tons per year (tpy), respectively. Starting in 2014, the emissions limits in the BEP permits issued by the MDAQMD were reduced in two steps for two different regulatory purposes.² In the first step, permitted emissions of NOx, CO, and PM₁₀ were reduced from their originally permitted levels to 97 tons per year to more closely reflect actual emissions performance. This made BEP a minor source for air regulatory purposes, which helped streamline the air quality permitting process for AltaGas's new Sonoran Energy Project (Sonoran), which was considered part of the same stationary source under the applicable air regulations. In the second step, permitted emissions of SO_2 and PM₁₀ were reduced at the same time the new Sonoran project received Authorities to Construct, allowing AltaGas to create simultaneous emissions reductions that could be used to offset proposed increases in emissions at Sonoran that would have otherwise required the purchase of emission reduction credits (ERCs). The new, lower emission limits for BEP were adequate to accommodate the operating scenarios anticipated for the facility by AltaGas at the time the changes were made because of the expectation that the proposed Sonoran project would also become operational. When the authorities to construct for the proposed Sonoran Energy Project were issued, the permits included limits on total emissions from both BEP and Sonoran as a single stationary source. Finally, in May 2017, BEP completed implementation of the turndown upgrades to the gas turbines as authorized by the District's letter dated December 2, 2014. The turndown upgrades increase BEP's ability to provide additional ancillary services and enable the units to be much more flexible to meet CAISO's grid needs and integrate renewable resources.

¹ BEP was a major source because potential emissions of at least one criteria pollutant exceeded 100 tpy. Potential emissions of SOx and VOC were below 100 tpy.

² The federal PSD permit issued by EPA Region 9 contains the original limits and is still in effect. The PSD permit was not affected either by the subsequent amendments or the current proposal as the facility remains in compliance with those PSD conditions.

AltaGas has withdrawn its petition to the CEC seeking to license the Sonoran Energy Project, and is requesting the cancellation of the authorities to construct issued for Sonoran in 2016. Since AltaGas no longer plans to develop Sonoran, the expected operating schedule for BEP is somewhat different than previously planned. BEP is now expected to be called upon by the CAISO to start up more frequently and to operate more often. As a result, AltaGas is concerned that the current annual CO limit in BEP's permits could restrict BEP's ability to operate as needed. AltaGas would like to increase the current annual CO emissions limit at BEP (97 tons per year) to the current combined level for both facilities (175 tons per year) to enhance operational flexibility.

2. Permit Changes

Blythe Energy is proposing to increase the annual mass emissions limit for CO in the current Permit to Operate (PTO) and Title V operating permit for the two existing gas turbines at BEP and to eliminate the conditions in the BEP permits that refer to Sonoran, since Sonoran will not be developed. Permit application forms are included as Appendix A.

No changes to any other limits are proposed.

Although the proposed changes in emissions limits will not involve any physical changes to the gas turbines, they reflect a change in the method of operation and are therefore considered a modification under District regulations. The changes will increase the annual CO mass emission limit to levels that will allow the BEP to operate as needed under anticipated electrical grid demands.

2.1 Increase Annual CO Limit for the Facility

The current annual CO limit for the BEP is based on the facility's expected operations with the Sonoran Energy Center in operation as well. Without Sonoran, BEP is expected to be called upon to start up and operate more than previously planned. CO emissions from the gas turbines are highest during startups, so the increased number of startups is expected to result in higher annual CO emissions from the facility. Therefore, Blythe Energy is proposing to increase the annual CO limit in the gas turbine Permits to Operate to provide more flexibility for anticipated gas turbine demand.

Blythe Energy is proposing to increase the annual limit for CO to the limit shown below, with compliance to be determined on a 12-month rolling total basis. Table 1 summarizes the requested increase in permitted annual CO emissions. The new annual CO limit of 175 tons per year at BEP will be equal to the sum of the previous limits for this pollutant at BEP and Sonoran, but will remain well below the annual CO limit of 621 tons per year in the original PSD permit that is still in effect.

BEP is currently a minor source, with emissions of all criteria pollutants from BEP below PSD major stationary source thresholds (40 CFR 52.21 (b)(1)(i)(c)), as shown in Table 1

Proposed Change in Permitted Annual CO Emissions1. The proposed increase in emissions is also below the PSD major stationary source thresholds, so the proposed modification will not be subject to PSD review.

Table 1 Proposed Change in Permitted Annual CO Emissions				
CO Emissions, tons per year				
Proposed permit limit	175			
Current permit limit	97			
Net change	78			
PSD major stationary source threshold	100			

2.2 Eliminate Combined Limits on Emissions from BEP and Sonoran

The air quality conditions in the Permits to Operate for the BEP gas turbines include limitations on combined emissions from BEP and the planned Sonoran Energy Project. Since the Sonoran Authorities to Construct are being cancelled and Sonoran will no longer be developed, there is no longer a need for those limitations.

3. Best Available Control Technology (BACT) and Air Quality Impacts

The proposed modification would increase the annual CO potential to emit for the gas turbines. BACT requirements apply only for nonattainment pollutants, and the District is in attainment for CO. Therefore, BACT does not apply to the proposed amendment.

Rule 1302 (D)(5)(b)(iv) requires a demonstration that the new or modified facility will not interfere with the attainment or maintenance of any national ambient air quality standard. The proposed change in the CO emissions limit affects only annual CO emissions, and there is no annual air quality standard for CO. Therefore, there is no potential for the proposed increase in CO to interfere with the maintenance of the CO ambient standards.³

4. Other Applicable Requirements

The following rules and regulations are applicable to the proposed permitting action:

4.1 Offsets

MDAQMD Regulation XIII – New Source Review requires offsets for non-attainment pollutants and their precursors for facilities and equipment having emissions which exceed the threshold specified in the rule. Because CO is not a nonattainment pollutant, no offset requirements are triggered by the proposed amendment.

4.2 NSR for Toxic Air Contaminants

Rule 1320 provides for the preconstruction review of any new, modified, relocated, or reconstructed facility which emits or has the potential to emit any hazardous air pollutants, toxic air contaminants, or regulated toxic substances. Potential emissions of these pollutants are based on maximum allowable fuel use. Since the proposed

³ Potential 1-hr and 8-hr average ambient CO impacts from BEP were evaluated as part of the application for the Sonoran Energy Project, which was submitted in August 2015. See Table 3.1-38 of Appendix A to "Application for an Authority to Construct for the Sonoran Energy Project and a Permit Amendment for the Blythe Energy Project."

amendment does not propose to change the allowable annual fuel use for the gas turbines, the proposed changes will not increase annual TAC impacts above levels previously analyzed for BEP. Therefore, this requirement is not applicable to the proposed project.

4.3 Prevention of Significant Deterioration

The facility currently operates under PSD Permit Number SE 02-01, issued on April 25, 2007, by U.S. EPA Region 9. After the proposed increase in the annual CO emissions limit to 175 tons per year in the District PTO and Title V permits, the annual CO emissions will remain well below the limit of 684 tons per year in the PSD permit. As shown in Table 1, the proposed increase in annual CO emissions does not exceed the applicable PSD threshold, so no new PSD permitting requirements are triggered by the proposed amendment.

4.4 New Source Performance Standards

Under 40 CFR 60.14, a modification is defined as a physical or operational change that results in an increase in the hourly emission rate. Because the proposed modification only affects annual emissions, it is not a modification for purposes of the NSPS.

4.5 National Emission Standards for Hazardous Air Pollutants (NESHAP)

BEP is currently a minor source of hazardous air pollutants (HAP), and the proposed change in the annual CO mass emissions limit will not affect the facility potential to emit for HAPs because it does not affect the permitted annual fuel use limit. There are no NESHAP that are applicable to the proposed amendment.

4.6 Greenhouse Gas (GHG) Emissions

Condition 18 in Permits to Operate B007953 and B007954 limits total annual fuel use from the gas turbines and duct burners at BEP to 31,852,800 MMBtu in any rolling 12-month period, and the facility potential to emit GHGs is based on this permitted fuel use limit. The proposed change in the annual CO mass emissions limit will not affect the facility potential to emit for GHG as it will not affect the annual fuel use limit in the existing permits.

4.7 District Prohibitory Rules

The proposed change in the annual CO mass emissions limit will not affect the facility's ability to comply with applicable District prohibitory rules.

5. Proposed Permit Conditions

This section presents the proposed changes to conditions of the BEP Permits to Operate for the gas turbines (B007953 and B007954, dated April 5, 2016) and Federal Operating Permit (#130202262, dated December 18, 2015). Proposed changes are shown in strikeout and **bold underline** font. Only the modified conditions are shown.

5.1 Changes to Conditions: Permits to Operate

DESCRIPTION:

COMBUSTION TURBINE GENERATOR POWER BLOCK (CT1) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800436 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007954), maximum turbine heat input of 1776 MMBtu/hr.

AND

COMBUSTION TURBINE GENERATOR POWER BLOCK (CT2) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800437 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007953), maximum turbine heat input of 1776 MMBtu/hr.

CONDITIONS:

7. Emissions from all Blythe Energy Project I permit units at this facility (as listed in Part I.A.1 of this permit), including the cooling towers, shall not exceed the following emission limits, based on a rolling 12 month summary:

a. NOx - 97 tons/year, verified by CEMS

b. CO - 97 175 tons/year, verified by CEMS

c. VOC as CH4 - 24 tons/year, verified by compliance tests and hours of operation in steady-state, pre-mix mode

d. SOx as SO2 – 12 tons/year, verified by fuel sulfur content and fuel use data e. PM10 – 56.9 tons/year, verified by compliance tests and hours of operation These limits shall apply to all emissions from all Blythe Energy Project permit units at this facility (as listed in Part I.A.1, of the Federal Operating Permit), and shall include emissions during all modes of operation, including startup, shutdown and malfunction.

8. Pursuant to Regulation XIII the Blythe Energy Project and Sonoran Energy Project are one stationary source. Emissions from all permit units at the Blythe Energy Project and Sonoran Energy Project facilities, shall not exceed the following emission limits, based on a rolling 12 month summary: a. NOx - 182.6 tons/year, verified by CEMS

b. CO - 175 tons/year, verified by CEMS

c. VOC as CH4 - 48.3 tons/year, verified by compliance tests and hours of operation in steady-state, pre-mix mode

d. SOx as SO2 - 20.8 tons/year, verified by fuel sulfur content and fuel use data e. PM10 - 97 tons/year, verified by compliance tests and hours of operation These limits shall apply to all emissions from all Blythe Energy Project and Sonoran Energy Project permit units at this facility, and shall include emissions during all modes of operation, including startup, shutdown and malfunction.

5.2 Changes to Conditions: Federal Operating Permit

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS EQUIPMENT DESCRIPTIONS:

- A. Permit #B007953 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT1) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800436 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007954), maximum turbine heat input of 1776 MMBtu/hr.
- B. Permit #B007954 COMBUSTION TURBINE GENERATOR POWER BLOCK (CT2) consisting of: Natural gas fueled Siemens F Class Model V84.3A(2) Serial No. 800437 combustion turbine generator power block producing approximately 260 MW(e) with a connected heat recovery steam generator and a steam condensing turbine (shared with B007953), maximum turbine heat input of 1776 MMBtu/hr.

PERMIT CONDITIONS:

- 7. Emissions from this facility, including the cooling towers, shall not exceed the following emission limits, based on a rolling 12 month summary: a. NOx - 97 tons/year, verified by CEMS

 - b. CO 97 175 tons/year, verified by CEMS

c. VOC as CH4 - 24 tons/year, verified by compliance tests and hours of operation in steady-state, pre-mix mode

d. SOx as SO2 - 12 tons/year, verified by fuel sulfur content and fuel use data e. PM10 – 56.9 tons/year, verified by compliance tests and hours of operation These limits shall apply to all emissions from all Blythe Energy Project permit units at this facility (as listed in Part I.A.1, of the Federal Operating Permit), and shall include emissions during all modes of operation, including startup, shutdown and malfunction.

8. Pursuant to Regulation XIII the Blythe Energy Project and Sonoran Energy Project are one stationary source. Emissions from all permit units at the Blythe Energy Project and Sonoran Energy Project facilities, shall not exceed the following emission limits, based on a rolling 12 month summary: a. NOx - 182.6 tons/year, verified by CEMS

b. CO - 175 tons/year, verified by CEMS

c. VOC as CH4 - 48.3 tons/year, verified by compliance tests and hours of operation in steady-state, pre-mix mode

d. SOx as SO2 - 20.8 tons/year, verified by fuel sulfur content and fuel use data

e. PM10 - 97 tons/year, verified by compliance tests and hours of operation These limits shall apply to all emissions from all Blythe Energy Project and Sonoran Energy Project permit units at this facility, and shall include emissions during all modes of operation, including startup, shutdown and malfunction.

Appendix A

Permit Application Forms

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue, Victorville, CA92392-2310(760) 245-1661Facsimile: (760) 245-2022

www.mdaqmd.ca.gov Brad Poiriez Executive Director

APPLICATION FOR AUTHORITY TO CONSTRUCT AND PERMIT TO OPERATE

Page 1 of 2: please type or print

REMIT \$269.00 WITH THIS DOCUMENT (\$153.00 FOR CHANGE OF OWNER)

1. Permit To Be Issued To (comp	pany name to receive permit):		1a. Federa	I Tax ID No.:	
Blythe Energy Inc.					
2. Mailing/Billing Address (for ab	ove company name):				
P.O. Box 1210, E	Blythe, CA 9222	26			
3. Facility or Business License N	ame (for equipment location):				
Blythe Energy P	roject				
4. Facility Address - Location of I	Equipment (if same as for com	pany, enter "Same"):	Location U	TM or Lat/Long:	
385 N. Buck Blvc	d., Blythe, CA)2225	(m) 71460	09 (E) / 3721719 (N)	
5. Contact Name/Title:		Email Address:	Phone/Fax	Nos.:	
Peter Ledig		Peter.Ledig@altagas.ca	(469) 90	04-5208	
6. Application is hereby made for	r Authority To Construct (ATC)	and Permit To Operate (PT	O) the follow	ving equipment:	
Increase in permitted annual CC	D emissions limit for existing S	Siemens F Class V84.3A(2)) gas turbine	with duct-fired HRSG	
Air Pollution Control Equipment,	if any (note that most APCE re	equire a separate application	n):		
Selective Catalytic Red	uction (SCR) and Oxid	dation Catalyst			
7. Application is for:		For modificati	on or chang	ge of owner:	
New Construction	odification*	f Owner* *Current Pern	nit Number:	B007953	
8. Type of Organization (chec	k one):				
Individual Owner Partner	rship Corporation Utilit	ty Local Agency Sta	te Agency	Federal Agency	
9. General Nature of Business	S:	Principal Product:	S	SIC Code (if known):	
Electric Power G	eneration	Electricity	4	4911	
10. Distances (feet and direct	ion to closest):				
490 N Fenceline	3,960 SW Residence	5,280 W Busir	ness 25	5,112 E _{School}	
11. Facility Annual Throughput	t by Quarters (percent):	12. Expected Facility Op	perating Ho	urs:	
25 _% 25 _%	25 % 25 %	24 7	52	8,760	
Jan-Mar Apr-Jun	Jul-Sep Oct-Dec	Hrs/Day Days/Wk	Wks/Y	r Total Hrs/Yr	
13. Do you claim Confidentiality of Data (if yes, state nature of data on reverse in Remarks)?					
14. Signature of Responsible Official: Official Title:					
Vice President					
Typed or Printed Name of Responsible Official: Phone Number:			Da	te Signed:	
Peter Ledig (469) 904-5208 9/5/17					
A 12 14 KJ 1	- For Distric	t Use Only -		17 - 111 AL	
Application Number:	Invoice Number:	Permit Number:	Company	/Facility Number:	

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT GENERAL APPLICATION, continued

Stack No.	Stack Height	Stack Diameter	Exhaust Temp	Exhaust Flow Rate	Exhaust Velocity
1 _	130 ft.	19 ft.	170 F	1,009,505 acfm	59.3 fps (estimate
2					
3					
		(list additional	stacks on a separa	ite sheet)	
tack Heigh	t is the distance	above ground level	to discharge point	(feet)	
tack Diame	eter is the diame	ter (or equivalent cir	cular diameter) of	discharge point (neares	st tenth foot)
 Vila vila Tau	f using cross-sec	ctional area (A in squ	uare feet), equivale	ent diameter is D = (1.2	73A)^0.5
xhaust Flo	w Rate at discha	racutal of estimated	ubic feet per minut	r e (ACFM)	
xhaust Vel	ocity in feet per s	second, design or m	easured		
Remarks	(basis for confide	antiality of data proc	sees description m	odification description	etc.):
lythe Energy p	roposes to increase th	e annual mass emissions	limit for CO for the two e	xisting Siemens F Class	e.c.).
/84.3A(2) gas	turbines in the current	Permit to Operate (PTO).			
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MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue, Victorville, CA92392-2310(760) 245-1661Facsimile: (760) 245-2022

www.mdaqmd.ca.gov Brad Poiriez Executive Director

APPLICATION FOR AUTHORITY TO CONSTRUCT AND PERMIT TO OPERATE

Page 1 of 2: please type or print

REMIT \$269.00 WITH THIS DOCUMENT (\$153.00 FOR CHANGE OF OWNER)

1. Permit To Be Issued To (company name to receive permit):		1a. Federal Tax ID No.:			
Blythe Energy Inc.					
2. Mailing/Billing Address (for above company name):					
P.O. Box 1210, Blythe, CA 922	26				
3. Facility or Business License Name (for equipment location):		1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 19			
Blythe Energy Project					
4. Facility Address - Location of Equipment (if same as for con	npany, enter "Same"):	Location UTM or Lat/Long:			
385 N. Buck Blvd., Blythe, CA	92225	(m) 714609 (E) / 3721719 (N)			
5. Contact Name/Title:	Email Address:	Phone/Fax Nos.:			
Peter Ledig	Peter.Ledig@altagas.ca	(469) 904-5208			
6. Application is hereby made for Authority To Construct (ATC	and Permit To Operate (PT	O) the following equipment:			
Increase in permitted annual CO emissions limit for existing	Siemens F Class V84.3A(2)	gas turbine with duct-fired HRSG			
Air Pollution Control Equipment, if any (note that most APCE n	equire a separate application	1):			
Selective Catalytic Reduction (SCR) and Oxi	dation Catalyst				
7. Application is for:	For modification	on or change of owner:			
New Construction Modification* Change o	f Owner* *Current Perm	hit Number: B007954			
8. Type of Organization (check one):	1000.0				
Individual Owner Partnership Corporation Utili	ty Local Agency Stat	te Agency Federal Agency			
9. General Nature of Business:	Principal Product:	SIC Code (if known):			
Electric Power Generation	Electricity	4911			
10. Distances (feet and direction to closest):					
490 N Fenceline 3,960 SW Residence	e <u>5,280 W</u> Busin	ess 25,112 E School			
11. Facility Annual Throughput by Quarters (percent):	12. Expected Facility Op	erating Hours:			
$25_{\%}$ $25_{\%}$ $25_{\%}$ $25_{\%}$ $25_{\%}$	24 7	52 8,760			
Jan-Mar Apr-Jun Jul-Sep Oct-Dec	Hrs/Day Days/Wk	Wks/Yr Total Hrs/Yr			
13. Do you claim Confidentiality of Data (if yes, state nature of data on reverse in Remarks)?					
14. Signature of Responsible Official: Official Title:					
Yeta dela Vice President					
Typed or Printed Name of Responsible Official:	Phone Number:	Date Signed:			
Peter Ledig (469) 904-5208 9/3//7					
- For Distric	t Use Only -	7 •			
Application Number: Invoice Number:	Permit Number:	Company/Facility Number:			

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT GENERAL APPLICATION, continued

Stack No.	Stack Height	Stack Diameter	Exhaust Temp	Exhaust Flow Rate	Exhaust Velocity
1	130.#	10 #	170 E	1 009 505 acfm	50.3 for (estimate
1 _	13011.	19 II.	170 F	1,009,505 acim	59.5 lps (estimate
2 -					
3					
		(list additional	stacks on a separa	te sheet)	
Stack Heigh	nt is the distance	above ground level	to discharge point ((feet)	
Stack Diam	eter is the diame	ter (or equivalent cir	cular diameter) of (discharge point (neares ont diameter is $D = (1.2)$	st tenth foot)
Exhaust Te	mp in degrees F.	acutal or estimated	to nearest 50 deg	F	(3A) 0.3
Exhaust Flo	w Rate at discha	rge point in actual c	ubic feet per minute	e (ACFM)	
Exhaust Ve	locity in feet per s	second, design or m	leasured		
. Remarks	(basis for confide	entiality of data, proc	cess description, m	odification description,	etc.):
lythe Energy p	proposes to increase th	e annual mass emissions	limit for CO for the two ex	xisting Siemens F Class	500000 (Dec)
/84.3A(2) gas	turbines in the current	Permit to Operate (PTO).			
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TITLE V APPLICATION CHECKLIST

Initial Title V application	
1202-A Submission Certification Form	Completed
1202-B1 Facility Summary Form	
1202-B2 Facility Emissions Summary Form	Completed
1202-C Combustion Emissions Unit Form	Completed Not Applicable
1202-D Piston Engine Emissions Unit Form	Completed Not Applicable
1202-E Coating/Solvent Emissions Unit Form	Completed Not Applicable
1202-F Organic Liquid Storage Unit Form	Completed Not Applicable
1202-G General Emissions Unit Form	Completed Not Applicable
1202-H Emissions Control Unit Form	Completed Not Applicable
1202-I Exempt Equipment listing Form	Completed
1202-J Compliance Plan Form	
1202-K Compliance Certification Form	
1202-L Monitoring Report Form	Completed
1202-M Alternative Operating Scenario(s) Form	Completed Not Applicable
Title V Permit Modification	
1202-N Permit Application for Administrative Amendment or	X Completed
Minor/Significant Modification	
Title V Permit Renewal	
1202E2-A General Facility Information form	Completed
1202E2-B Application Certification form	Completed
1202E2-C Non-Compliant Operations Report	Completed Not Applicable
1202E2-D List of Exempt Equipment	Completed
1202E2-E Potential Emissions Report	Completed
1202E2-F Compliance Assurance Monitoring	Completed
1202E2-G Permit Shield Request	Completed Not Applicable
1202E2-H Alternate Operating Scenarios form	Completed Not Applicable
Title V Compliance Reports	
TV Form 19A – Annual Compliance Certification	
TV Form 19B – Semi-Annual Monitoring Report	Completed
TV Form 19C – Deviation Report	Completed

Mojave Desert Air Quality Management District

TITLE V – PERMIT AMENDMENT / MODIFICATION

I. PERMIT ACTION (Check appropriate box)	
□ ADMINISTRATIVE AMENDMENT □ MINOR MODIFICATION ■ SIGNIFICANT MODIF	ICATION
OFF-PERMIT CHANGE	
1. FACILITY NAME: Blythe Energy Project	
2. FACILITY ID: 1000 0018 0181	
3. TITLE V PERMIT NO: 130202262	
4. TYPE OF ORGANIZATION: Corporation Sole Ownership Government Partnership Utility	
5. COMPANY NAME: Blythe Energy Inc.	
6. COMPANY MAILING/BILLING ADDRESS: STREET/P.O. BOX: P.O. BOX 1210	x
CITY: Blythe STATE: CA 9-DIGIT ZIP CODE: 92226	
7. FACILITY ADDRESS: STREET: 385 N. Buck Blvd.	PROPOSED DATE OF INSTALLATION:
CITY: Blythe STATE: CA 9-DIGIT ZIP CODE: 92225	n/a
8. DISTANCES (FEET AND DIRECTION) TO CLOSEST: FENCELINE: 490 N RESIDENCE: 3,960 SW BUSINESS: 5,280 W SCHOOL:	25,112 E
9. GENERAL NATURE OF BUSINESS: electric power generation	
10. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
Blythe Energy proposes to increase the annual mass emissions limit for CO in the currer operating permit.	nt Title V
11. PERSON TO CONTACT FOR INFORMATION ON THIS APPLICATION:	
NAME: Peter Ledig PHONE NUMBER: (469) 904-5208	
TITLE: Vice President EMAIL: Peter.Ledig@altagas.ca	

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661 Revised: January 8, 2013

Form 1202-N Title V Modification

II. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):



Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

 \checkmark

Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.



Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Signature of Responsible Official

Peter Ledig

Name of Responsible Official (please print)

Vice President

Title of Responsible Official (please print)

For AQMD Use Only:

DATE STAMP		COMPANY
C C SAM Provi Showes	DISTRICT PERMIT	/FACILITY
	APPLICATION NO:	ID:

Date

Form 1202-N Title V Modification

APPENDIX B

Property Owners Within 1,000 Feet of the Project Site



APN_D	FIRSTNAME	LASTNAME	TITLE	ORG	ADDRESS	ADDRESS_2	CITY	STATE	ZIP
821-110-004				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
821-120-027				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
821-120-028				ALTAGAS POWER HOLDINGS US INC	1411 THIRD ST #A		PORT HURON	MI	48060
821-120-038				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
824-080-003				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
824-080-003				OCCUPANT	15550 W HOBSON WAY		BLYTHE	CA	92225
824-080-004				COUNTY OF RIVERSIDE	P.O. BOX 1180		RIVERSIDE	CA	92502
824-080-004				OCCUPANT	16350 W HOBSON WAY		BLYTHE	CA	92225
824-080-005				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
824-101-007				COUNTY OF RIVERSIDE	P.O. BOX 1180		RIVERSIDE	CA	92502
824-101-012				ALTAGAS SONORAN ENERGY Inc.	1411 THIRD ST #A		PORT HURON	MI	48060
824-101-013				ALTAGAS SONORAN ENERGY Inc.	1411 THIRD ST #A		PORT HURON	MI	48060
824-101-015				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
824-101-016				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
824-101-021				BLYTHE ENERGY	P.O. BOX 1210		BLYTHE	CA	92226
824-101-021				OCCUPANT	385 N BUCK BLVD		BLYTHE	CA	92225
824-101-022				USA	P.O. BOX 281213		LAKEWOOD	CO	80228
824-102-020				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
824-102-026				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036
824-102-027				GILA FARM LAND LLC	113 S LA BREA AVE		LOS ANGELES	CA	90036