

DOCKETED

Docket Number:	13-AFC-01C
Project Title:	Alamitos Energy Center - Compliance
TN #:	228908
Document Title:	Alamitos Energy Center Auxiliary Boiler Commissioning Petition to Amend
Description:	N/A
Filer:	Jerry Salamy
Organization:	Jacobs
Submitter Role:	Applicant Consultant
Submission Date:	7/5/2019 12:07:29 PM
Docketed Date:	7/5/2019



Auxiliary Boiler Commissioning Changes

Petition for Post-Certification Amendment

for the

Alamitos Energy Center
Long Beach, California
(13-AFC-01C)

July 2019

Submitted to the:
California Energy Commission

Submitted by:
AES Alamitos Energy, LLC

With Technical Assistance by:

JACOBS
and
Yorke Engineering



Executive Summary

AES Alamos Energy, LLC (the Project Owner) is submitting this petition to the California Energy Commission (CEC) for post-Certification license modification for the Alamos Energy Center (AEC) (13-AFC-01C). The AEC consists of a combined cycle gas turbine (CCGT) power block and a simple cycle gas turbine (SCGT) power block. The CCGT power block includes unfired heat recovery steam generators (HRSG), a condensing steam turbine (STG), an air-cooled condenser, and ancillary facilities.

This Petition to Amend (PTA) proposes the following changes to conform the AEC Certification to the recently approved minor revisions to the Title V Permit for the Facility recently approved by the SCAQMD in consultation with US EPA:

- Increase the total number of auxiliary boiler commissioning hours from 30 to 100 with no change in air emissions.
- Minor changes to permit conditions affecting the auxiliary boiler commissioning.
- Increase the minimum ammonia injection rate for the auxiliary boiler.

To analyze potential environmental effects, an environmental impacts assessment is presented in Section 3. The assessment concludes that there will be no significant environmental impacts associated with the implementation of the actions specified in this PTA and that the project, as modified, will continue to comply with all applicable LORS.

Contents

- Executive Summary 1**
- 1. Introduction 1**
 - 1.1 Background 1
 - 1.2 Overview of Proposed Amendments 1
 - 1.3 Necessity of Proposed Changes, an Explanation of Why it Should Be Permitted, and a Description of New Information or Change in Circumstances 1
 - 1.4 Summary of Potential Environmental Effects and Proposed Mitigation Measures 2
 - 1.5 Consistency of Changes with Applicable LORS 2
- 2. Description of Proposed Amendments 2**
 - 2.1 Auxiliary Boiler Revised Conditions of Certification 3
 - 2.2 Auxiliary Boiler New Title V Conditions of Certification..... 3
- 3. Environmental Analysis of Proposed Amendments 3**
 - 3.1 Air Quality and Greenhouse Gases 4
 - 3.1.1 Environmental Setting 4
 - 3.1.2 Environmental Consequences 4
 - 3.1.3 Regulatory Requirements 4
 - 3.1.4 Mitigation Measures 7
 - 3.1.5 Consistency with LORS 7
 - 3.1.6 Conditions of Certification 7
 - 3.2 Public Health 10
 - 3.2.1 Environmental Setting 10
 - 3.2.2 Environmental Consequences 10
 - 3.2.3 Mitigation Measures 10
 - 3.2.4 Consistency with LORS 11
 - 3.2.5 Conditions of Certification 11
- 4. Potential Effects on the Public 11**
- 5. List of Property Owners 11**
- 6. Potential Effects on Property Owners, the Public, and Parties in the Proceeding 11**
- 7. Potentially Applicable CEQA Exemptions..... 11**

1. Introduction

1.1 Background

The CEC approved the AEC AFC on April 12, 2017. The AEC project site is on the existing Alamitos Generating Station property, in the City of Long Beach, CA. The CEC analyzed the AEC's project impacts for two General Electric Model 7FA.05 combustion turbines in a combined cycle configuration and four General Electric Model LMS100-PB combustion turbines simple cycle configuration. The AEC project is currently under construction.

The Project Owner submitted a PTA to the CEC license in July 2018. The purpose of that PTA was to allow the use of a gravel area adjacent to the project site, on Southern California Edison's switchyard site. The CEC approved the PTA in August 2018.

The Project Owner submitted a PTA on April 4, 2019 to modify the combined and simple cycle gas turbines operating hours to optimize project operations consistent with the Project Owners other power plant located in Huntington Beach, CA.

This PTA proposes changes to conform the AEC Certification to the recently approved minor revisions to the Title V Permit for the Facility recently approved by the SCAQMD in consultation with US EPA.

1.2 Overview of Proposed Amendments

This PTA addresses the potential environmental impacts associated with the proposed changes to the auxiliary boiler commissioning period. Specifically, the Project Owner is proposing to revise three existing Conditions of Certification (CoC) and three new Title V conditions added by the SCAQMD. The proposed changes include refinements in the auxiliary boiler commissioning emission factors, increasing the duration of the auxiliary boiler commissioning period, and revising the maximum ammonia injection rate of the Selective Catalytic Reduction (SCR) pollution control system. New Title V Conditions of Certification include allowing the use of a Continuous Emission Monitoring System (CEMS) to demonstrate compliance with emission limits, defining a Oxides of Nitrogen (NOx) emission factor for use during the auxiliary boiler commissioning period, and a source test method for demonstrating compliance with the auxiliary boiler ammonia emission limits.

Detailed description of the proposed modifications are included in Section 2 and analyzed in Section 3.

This PTA contains all of the information that is required pursuant to the CEC's Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes).

1.3 Necessity of Proposed Changes, an Explanation of Why it Should Be Permitted, and a Description of New Information or Change in Circumstances

The CEC Siting Regulations require a discussion of the necessity for the proposed revisions to AEC Certification, an explanation of why the change should be permitted, and a description of any new information or change in circumstances that necessitated the change (Title 20, CCR, Sections 1769 (a)(1)(B), and (C)). The changes are necessary to commission the auxiliary boiler in a manner consistent with the revised air permit. Currently, the air permit and Commission Decision does not include an allowance for auxiliary boiler commissioning. The Project Owner has submitted a permit modification request to the SCAQMD and is requesting this modification to the license to ensure the air permit and license are consistent.

1.4 Summary of Potential Environmental Effects and Proposed Mitigation Measures

The CEC Siting Regulations require an analysis of the effects that the proposed change to the project may have on the environment and proposed mitigation measures to mitigate any significant environmental effect (Title 20, CCR, Section 1769 (a)(1)(D).) Section 3 of this PTA includes a discussion of the potential environmental impacts associated with the modifications as well as a discussion of the consistency of the modification with LORS. Section 3 concludes that there will be no significant environmental impacts associated with implementing the actions specified in this PTA since the changes proposed are less than the maximum potential emissions and impacts already analyzed for operations and that the project, as modified, will comply with all applicable LORS.

1.5 Consistency of Changes with Applicable LORS

The CEC Siting Regulations require an analysis of how the impacts the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards (LORS). (Title 20, CCR, Section 1769 (a)(1)(E).) The proposed project modifications are consistent with all applicable LORS, as discussed in Section 3. The proposed project changes will allow Project Owner to commission the auxiliary boiler, while meeting applicable LORS.

2. Description of Proposed Amendments

This section includes a description of the proposed project modifications, consistent with CEC Siting Regulations (Title 20, CCR, Section 1769 (a)(1)(A)).

The AEC is currently in construction and is scheduled to begin CCGT commissioning in October 2019. Auxiliary boiler commissioning is scheduled to begin July 29, 2019. During the planning for the auxiliary boiler commissioning activities, the Project Owner determined that the then current Title V permit did not contain conditions that anticipated auxiliary boiler commissioning. As a result, the Project Owner commenced preparation of an air permit modification request and this PTA.

The approved changes include the following:

- Revising Condition of Certification AQ-A3 to refine the commissioning emission factors.
- Revise Condition of Certification AQ-E5 to increase the number of auxiliary boiler fired commissioning hours from 30 to no more than 100 while not exceeding the monthly calendar emission limits.
- Revise Condition of Certification AQ-D7 to increase the auxiliary boiler maximum ammonia injection rate from 1.1 pounds per hour to 3.9 pounds per hour.
- Include a new Title V Condition of Certification to define the NOx emission factor during auxiliary boiler commissioning period for use in reporting to the RECLAIM program.
- Include a new Title V Condition of Certification to allow the use of a CEMS to demonstrate compliance with the auxiliary boiler CO emission limit.
- Include a new Title V Condition of Certification that defines the source test methods to demonstrate compliance with the auxiliary boiler ammonia emission limit.

No physical changes to the project design are proposed, no earth-moving activities are required and no change to the construction, commissioning and operations as described in the original Application for Certification are necessary to implement the proposed changes. The following subsection describes the proposed changes.

2.1 Auxiliary Boiler Revised Conditions of Certification

During licensing, the Project Owner provided an estimate of the proposed auxiliary boiler commissioning emissions for the preparation of the project's air permit. These emission limits were based on the cold start emissions for the auxiliary boiler, when the emission controls systems (selective catalytic reduction, ultra-low NOx burners, and flue gas recirculation) were either not operational or operating at less than design specifications. While preparing for the auxiliary boiler commissioning, the Project Owner determined that several conditions required modification. A discussion of these modifications is presented below and proposed Conditions of Certification are included in Section 3.1.6.

As licensed, Condition AQ-A3 required modification to the emission factors to be used to report commissioning emissions to the SCAQMD. Additionally, a CO emission factor is incorporated for reporting emissions to the SCAQMD during the interim period after commissioning but prior to certification of the auxiliary boiler CEMS. Finally, Condition AQ-A3 is being modified to allow the use of a CEMS to demonstrate compliance with the monthly CO emissions limits once commissioning is complete. No changes in the maximum allowable monthly or hourly emissions are proposed.

Condition AQ-E5 includes a 30 hour fired limit on auxiliary boiler commissioning. The Project Owner is proposing to increase this to a total of 100 hours of fired auxiliary boiler operation during commissioning. No increase in the maximum monthly or hourly emissions are proposed from this proposed change.

As licensed, Condition AQ-D7 prohibits injection of ammonia into the auxiliary boiler selective catalytic reduction system in excess of 1.1 pounds per hour. The Project Owner proposes to increase this to 3.9 pounds per hour to achieve the permitted NOx emission rate. No change to the control equipment or boiler are required to accomplish this proposed change and no increase in auxiliary boiler ammonia emissions will result.

2.2 Auxiliary Boiler New Title V Conditions of Certification

The first new Title V Condition of Certification (proposed air permit condition A99.6) incorporates an NOx emission factor to be used to report the auxiliary boiler NOx emissions during commissioning to the SCAQMD. This emission factor is required to allow the Project Owner a mechanism to report NOx emissions to the SCAQMD's RECLAIM program prior to the certification of the auxiliary boiler's CEMS. Once the CEMS has been certified, it will be used to monitor and report auxiliary boiler NOx emissions directly to the SCAQMD.

The next new Title V Condition of Certification (proposed air permit condition D82.4) requires the Project Owner to install, certify, and maintain a CO CEMS. The purpose of the CEMS is to measure the auxiliary boiler CO (and NOx) emissions and oxygen concentration for the purpose of reporting CO emissions to the SCAQMD. The CEMS CO emissions will be used to demonstrate compliance with the auxiliary boiler's CO emission limit contained in Condition of Certification AQ-A3.

The last new Title V Condition of Certification (proposed air permit condition D29.7) specifies the frequency, and method for conducting ammonia source testing of the auxiliary boiler necessary to demonstrate compliance with the SCAQMD Rule 1303.

3. Environmental Analysis of Proposed Amendments

The following subsections present a discussion of the potential impacts that the proposed changes may have on the environmental analysis as presented in applicable sections of the AFC. Each discussion includes an environmental analysis, an assessment of compliance with applicable LORS, proposed mitigation measures, and, if applicable, proposed changes to the COCs that are necessary as a result of project modifications.

3.1 Air Quality and Greenhouse Gases

3.1.1 Environmental Setting

The proposed changes to the AEC Conditions of Certification project will not result in an increase in air emissions above those analyzed in the Commission Decision. Both the Commission and SCAQMD considered the commissioning of the auxiliary boiler in their respective analyses and the proposed changes to the existing Conditions of Certification and new Conditions do not increase hourly, monthly, or annual emissions above those presented in the Commission Decision. Furthermore, the proposed changes do not change the auxiliary boiler exhaust parameters (stack height, temperature, or flow rate) used by the Commission to determine that AEC would not result in a significant unmitigated air quality or greenhouse gas impact.

3.1.2 Environmental Consequences

3.1.3 Regulatory Requirements

3.1.3.1 Federal Regulations

The federal pre-construction Prevention of Significant Deterioration (PSD) program for sources subject to PSD pre-construction review permitting applies to sources located in attainment areas, which are classified as major sources. The AEC is subject to the PSD program. Therefore, PSD review applies to the proposed modification, which will be addressed below in the Local Regulations discussion.

The federal operating permit program (Title V) and prohibitory rules applicable will be addressed in the Section 3.1.3.2, Local Regulations.

3.1.3.2 Local Regulations

The SCAQMD has promulgated rules governing the need for sources to apply for pre-construction/operating permits, and prohibitory rules. Below is an analysis of the SCAQMD rules applicable to the proposed AEC modifications.

Rule 212 – Standards for Approving Permits and Issuing Public Notice

Public notice is required for any new or modified equipment under Regulation XXX that may emit air contaminants located within 1,000 feet from the outer boundary of a school, unless the modification will result in a reduction of emissions of air contaminants from the facility and no increase in health risk at any receptor location. The nearest K-12 school, Charles F. Kettering Elementary, is approximately 1,900 feet from the nearest emission source of the AEC. Rosie the Riveter Charter School, was formerly located within 1,000 feet from the site. However, since the proposed changes do not result in either an increase in air contaminants or health risk at any location, the public notification requirements of Rule 212 do not apply.

Rule 218 – Continuous Emissions Monitoring

The auxiliary boiler is equipped with a CO and NOx continuous emissions monitoring system that comply with the requirements of Rule 218 (c), (e), and (f). The changes in operating limits will not affect compliance with this rule.

Regulation III – Fees; Rule 301

The processing fees were determined using Rule 301 and the Project Owner has paid the applicable processing fees and has requested expedited permit processing.

Rule 401 – Visible Emissions

The subject equipment is not expected to result in visible emissions. Compliance with this rule is expected.

Rule 402 – Nuisance

This project is not expected to cause injury, detriment, nuisance, or annoyance to the public, based on the control systems and mitigation measures being employed as part of the project.

Rule 403 – Fugitive Dust

The fugitive dust emissions requirements set forth in Rule 403 will be adhered to by the Project Owner during operation. No significant fugitive dust emissions are expected from the facility during normal operations or due to the proposed changes in the operating limits. Therefore, compliance with this rule is expected.

Rule 407 – Liquid and Gaseous Air Contaminants

This rule prohibits an operator from discharging SO₂ and CO into the atmosphere from any equipment in excess of 500 parts per million by volume dry (ppmvd) and 2000 ppmvd, respectively. The CCGT and SCGT SO₂ and CO concentrations are less than these limits. Therefore, the project is in compliance with this rule.

Rule 409 – Combustion Contaminants

This rule prohibits an owner/operator from discharging into the atmosphere from any equipment combustion contaminants exceeding 0.1 grain per cubic foot of gas calculated to 12 percent of CO₂ at standard conditions averaged over a minimum of 15 consecutive minutes. The auxiliary boiler combusts only pipeline quality natural gas. The requested project changes will not adversely impact continued compliance with this rule.

Rule 431.1 – Sulfur Content of Gaseous Fuels

The natural gas fuel supplied to AEC is the same source as during licensing. Therefore, AEC will comply with the Rule 431.1 fuel sulfur limit.

Rule 474 – Fuel Burning Equipment-Oxides of Nitrogen

This rule is superseded by NO_x RECLAIM, Rule 2001 (see below).

Rule 475 – Electric Power Generating Equipment

The facility-wide PM emissions from the modification of operating limits will remain approximately the same. Therefore, compliance with this rule is expected.

Regulation IX – New Source Performance Standards

The New Source Performance Standards (NSPS) establishes emission standards for specific emission sources, as published in the Code of Federal Regulations (CFR) and in the Federal Register (FR) by the Environmental Protection Agency (EPA). The following NSPS are applicable to the project.

Regulation X – National Emission Standards for Hazardous Air Pollutants

The National Emission Standards for Hazardous Air Pollutants (NESHAP) regulate the emissions of hazardous air pollutants from specific emission sources. These regulations are periodically updated to reflect actions by the EPA.

NESHAPS for Stationary Gas Turbines – 40 CFR Part 63 Subpart YYY

Subpart YYY applies to gas turbines located at major sources of HAP emissions. A major source is defined as a facility with emissions of 10 tons per year or more of a single HAP or 25 tons per year or more of a combination of HAPs. AEC is not considered a major source of HAP. Therefore, the requirements of Subpart YYY do not apply.

Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines

The rule is superseded by NO_x RECLAIM, Rule 2001 (See below).

Rule 1135 – Emissions of Oxides of Nitrogen from Electric Power Generating Stations

The rule is superseded by NO_x RECLAIM, Rule 2001 (See below).

Regulation XIII – New Source Review

The proposed changes results in an emission increase of non-attainment pollutants, therefore new source review is required. However, as AEC is subject to RECLAIM for NO_x, Regulation XIII is not applicable for NO_x.

Rule 1303 – Requirements

Rule 1303 requires use of best available control technology (BACT), emissions modeling and emission offsets.

Best Available Control Technology (BACT)

The proposed changes will not result in a net emissions increase exceeding 1 lb/day. Therefore, BACT is not triggered.

Protection of Visibility

The proposed changes will not increase annual PM₁₀ emissions. Therefore, AEC is expected to comply with this rule.

Modeling

The proposed changes will not result in an increase in air emissions or alter the assumptions/parameters used in the air dispersion modeling used to demonstrate the project's conformance with the state and federal ambient air quality standards. Therefore, the proposed changes will not cause or contribute to the violation of an ambient air quality standard.

Offsets

Regulation XIII requires facilities with an air emission increase of greater than four tons per year for VOC, SO₂, and PM₁₀ provide emission offsets, exempt by Rule 1304. As there are no increase in air emissions, AEC is exempt from the requirement to purchase emission offsets based on Rule 1304(a)(2), which requires the Project Owner to pay an offset fee for SCAQMD-provided offsets.

Rule 1304.1– Electrical Generating Facility Fee for Use of Offset Exemption

Rule 1304(a)(2) required repower projects to pay a fee for the emissions of VOC, PM, and SO_x. Offset fees for NO_x emissions are excluded if the facility is subject to RECLAIM. The Project Owner is currently subject to RECLAIM for NO_x emissions and pays the annual Rule 1304.1 fee to the SCAQMD for AEC's VOC, PM, and SO_x emissions. The Project Owner will continue to comply with Rule 1304.1 when the proposed operational changes are approved by the SCAQMD and the CEC.

Rule 1401 – New Source Review for Air Toxics

No increase in hourly or annual fuel consumption is expected based on the proposed changes. Therefore, the human health risk assessment previously performed for AEC is still applicable and each permit unit would remain below the applicable Rule 1401 thresholds.

Regulation XVII – Prevention of Significant Deterioration

As noted above, the proposed changes will not result in a physical change to the auxiliary boiler, nor is a change in operation of the auxiliary boiler proposed. Furthermore, the proposed changes will not result in an increase in air emissions. Therefore, PSD review is not applicable.

Rule 1714 – Prevention of Significant Deterioration for Greenhouse Gases

No changes to the electrical generating units are proposed. Therefore, AEC will comply with the requirements of Rule 1714.

Rule 2005 – New Source Review for RECLAIM

Rule 2005(b)(B) requires that new or modified source(s) will not exceed NO₂ ambient air quality standards. Rule 2005(c)(2) also requires facilities to hold sufficient RTCs to offset the initial year of an emissions increase, including commissioning emissions. The proposed changes to the auxiliary boiler commissioning will not result in a change to the NO_x emission rate or requiring additional NO_x RTCs. Therefore, AEC complies with the Rule 2005 BACT and modeling requirements.

Regulation XXX – Title V

AEC has a Title V permit that covers emissions of VOC, NO_x, CO, and PM₁₀. The proposed changes will not result in an increase in air emissions. As a result, the SCAQMD will not require the posting of a public notice for modification to AEC's Title V permit consistent with Rule 3006.

Regulation XXXI – Acid Rain Permit Program

AEC is subject to the Acid Rain Permitting Program requirements, NO_x and SO_x emissions will be reported directly to the USEPA. Increases in NO_x and SO_x emissions are expected with this modification and continued compliance is anticipated.

3.1.4 Mitigation Measures

The proposed AEC modifications will not create a significant air quality or GHG impact and will not require additional mitigation measures.

3.1.5 Consistency with LORS

AEC will comply with applicable federal, state, and local air quality LORS.

3.1.6 Conditions of Certification

The Project Owner is proposing changes to three existing and new Title V Conditions specific to the auxiliary boiler commissioning. These proposed conditions are presented below.

AQ-A3 The project owner shall limit emissions from this equipment as follows:

CONTAMINANT	Range	Emissions Limit
Monthly Pounds in Any Calendar Month (lbs/month)		
CO	Less than or equal to	605 lbs/month
VOC	Less than or equal to	102 lbs/month
PM10/PM2.5	Less than or equal to	113.5 lbs/month
SO _x	Less than or equal to	32 lbs/month

The boiler shall not commence with normal operation until the commissioning process has been completed. The District and CPM shall be notified in writing once the commissioning process for the boiler is completed.

Normal operation may commence in the same calendar month as the completion of the commissioning process provided the boiler is in compliance with the above emission limits.

The project owner shall calculate the monthly emissions for CO, VOC, PM10, **PM2.5**, and SOx using the equation below.

Monthly Emissions, lb/month = (Monthly fuel usage in mmscf/month) * (Emission factors indicated below)

The following emission factors shall be used to demonstrate compliance with the monthly emission limits.

For commissioning, the emission factors shall be as follows: CO, 107.16 lb/mmcf; VOC, 115.56 lb/mmcf; PM10/PM2.5, 7.42 lb/mmcf; and SOx, 2.08 lb/mmcf.

For commissioning and normal operation, the emission factors shall be as follows: ~~CO, 39.55 lb/mmcf;~~ VOC, 6.67 lb/mmcf; PM10/**PM2.5**, 7.42 lb/mmcf; and SOx, 2.08 lb/mmcf.

For normal operation, the CO emissions shall be measured with certified CO CEMS. For the interim period after commissioning but prior to CEMS certification, and in the event of CEMS failure subsequent to CEMS certification, the emission factor shall be CO, 39.55 lb/mmcf.

For a month during which both commissioning and normal operation take place, the monthly emissions shall be the sum of the commissioning emissions and the normal operation emissions.

The project owner shall maintain records in a manner approved by the District to demonstrate compliance with this condition and the records shall be made available to District personnel upon request. The records shall include, but not be limited to, natural gas usage in a calendar month.

[RULE 1303(a)(1)-BACT, RULE 1303(b)(2)-Offset, RULE 1703(a)(2) – PSD-BACT]

[Devices subject to this condition: D181 (auxiliary boiler)]

Verification: The project owner shall provide emissions summary data in compliance with his condition as part of the Quarterly Operation reports (AQ-SC7).

AQ-E5 The project owner shall operate and maintain this equipment according to the following requirements.

Total commissioning hours shall not exceed **30100** hours of fired operation for the auxiliary boiler from the date of initial boiler start-up. The project owner shall vent this equipment to the SCR control system whenever the auxiliary boiler is in operation after commissioning is completed.

The project owner shall provide the SCAQMD with written notification of the initial startup date. The project owner shall maintain records in a manner approved by the District to demonstrate compliance with this condition and the records shall be made available to District personnel upon request. The records shall include, but not be limited to, the number of commissioning hours and natural gas fuel usage.

[Devices subject to this condition: D181 (auxiliary boiler)]

Verification: The project owner shall submit all records including the total number of commissioning hours and fuel usage to demonstrate compliance with this condition as part of the Quarterly Operational Report required in AQ-SC7. The project owner shall make the site available for inspection by representatives of the District, ARB, U.S. EPA and the Energy Commission.

AQ-D7 The project owner shall install and maintain a flow meter to accurately indicate the flow rate of the total hourly throughput of injected ammonia (NH₃).

The project owner shall also install and maintain a device to continuously record the parameter being measured. Continuously record shall be defined as measuring at least once every hour and shall be calculated based upon the average of the continuous monitoring for that hour.

The flow meter shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The project owner shall maintain the ammonia injection rate between 0.3 and ~~1.4~~3.9 pounds per hour.

[RULE 1303(a)(1)-BACT, RULE 1703(a)(2)-PSD-BACT, RULE 2005]

[Devices subject to this condition: C183 (auxiliary boiler)]

Verification: The project owner shall demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC7). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

SCAQMD TITLE V CONDITION A99.6

AQ-XX The 104.20 lbs/mmscf NO_x emission limit(s) shall only apply during the boiler commissioning period to report RECLAIM emissions, not to exceed one year after start of unit operations.

The operator shall maintain records of natural gas usage for this period.

[Devices subject to this condition: D181 (auxiliary boiler)]

Verification: The project owner shall demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC7). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

SCAQMD TITLE V CONDITION D82.4

AQ-XX The operator shall install and maintain a CEMS to measure the following parameters:

CO concentration in ppmv.

Concentrations shall be corrected to 3 percent oxygen on a dry basis.

The CEMS shall be installed and operated to measure CO concentrations over a 15 minute averaging time period.

The CEMS shall be installed and operating no later than 90 days after initial start-up of the turbine, and in accordance with an approved South Coast AQMD Rule 218 CEMS plan application. The operator shall not install the CEMS prior to receiving initial approval from the District.

The CEMS will convert the actual CO concentrations to mass emission rates (lbs/hr) and record the hourly emission rates on a continuous basis.

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

[Devices subject to this condition: D181 (auxiliary boiler)]

Verification: The project owner shall demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC7). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

SCAQMD TITLE V CONDITION D29.7D

AQ-XX The operator shall conduct source test(s) for the pollutant(s) identified below.

<u>Pollutant(s) to be Tested</u>	<u>Required Test Method(s)</u>	<u>Averaging Time</u>	<u>Test Location</u>
<u>NH3 emissions</u>	<u>South Coast AQMD Method 207.1</u>	<u>1 hour</u>	<u>Outlet of the SCR serving this equipment</u>

The test shall be conducted and the results submitted to the South Coast AQMD within 60 days after the test date. The District and CPM shall be notified of the date and time of the test at least 10 days prior to the test.

The test shall be conducted quarterly to demonstrate compliance with the ammonia emission limit during the first 12 months of unit operation and thereafter, except that source tests may be conducted annually within 12 months thereafter when four consecutive quarterly source tests demonstrate compliance with the ammonia emission limit. If an annual test is failed, four consecutive quarterly source tests must demonstrate compliance with the ammonia emissions limits prior to resuming annual source tests.

The NOx concentration, as determined by the certified CEMS, shall be simultaneously recorded during the ammonia slip test. If the CEMS is inoperable or not yet certified, a test shall be conducted to determine the NOx emissions using South Coast AQMD Method 100.1 measured over a 60 minute averaging time period.

The test shall be conducted to demonstrate compliance with the Rule 1303 concentration limit.

[RULE 1146, 11-1-2013; RULE 1146, 12-7-2018; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: C183 (auxiliary boiler)]

Verification: The project owner shall demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC7). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

3.2 Public Health

3.2.1 Environmental Setting

This PTA does not require changes to the Public Health environmental setting as described in the AFC and the CEC Decision.

3.2.2 Environmental Consequences

The proposed changes will not result in an increase in fuel consumption. Therefore, no increase Toxic Air Contaminant (TAC) and Hazardous Air Pollutant (HAP) emissions is expected. Therefore, no change to the public health impacts used by the Commission to license the project are expected.

3.2.3 Mitigation Measures

No public health impacts are expected, therefore no additional mitigation measures are required.

3.2.4 Consistency with LORS

The project conforms to applicable LORS related to public health.

3.2.5 Conditions of Certification

The proposed modifications do not require changes to the COCs for public health.

4. Potential Effects on the Public

This section discusses the potential effects on the public that may result from the modifications proposed in this PTA, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(F)).

With the implementation of the proposed changes, the project would have no adverse effect on the public. As previously mentioned, no increase in potential air emissions will occur and there are no changes to activities that were originally considered in the analysis of the AEC. Therefore, there are no significant adverse effects on public that will result from the proposed modification.

5. List of Property Owners

A list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of any affected project linears and 1000 feet of the project site in accordance with the CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(G)) is provided under separate cover.

6. Potential Effects on Property Owners, the Public, and Parties in the Proceeding

This section addresses potential effects of the project changes proposed in this PTA on nearby property owners, the public, and parties in the application proceeding, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769 (a)(1)(H)).

As set forth in Section 3, the proposed modifications will not result in any potentially significant impacts and the project will remain in compliance with all applicable LORS. The project as modified will not differ significantly in potential effects on adjacent land owners, compared with the project as certified. The proposed changes to the auxiliary boiler's commissioning process will have no adverse effect on nearby property owners, the public, or other parties in the application proceeding. The project, therefore, would have no adverse effects on nearby property owners, the public, or other parties in the application proceeding.

7. Potentially Applicable CEQA Exemptions

This section includes a discussion of any exemptions from the California Environmental Quality Act, commencing with section 21000 of the Public Resources Code, that the project owner believes may apply to approval of the proposed change. Given the operational changes proposed, the CEQA exemption for Air Quality permits (14 CCR 15281) would not apply in this case, and no other exemptions appear to be applicable.