

DOCKETED

Docket Number:	85-AFC-03C
Project Title:	Compliance - Application for Certification for Midway-Sunset Cogeneration Project
TN #:	240051
Document Title:	Midway Sunset Cogen - Letter to San Joaquin Valley Air Pollution Control District - Variance S-15-0SS Summary Report
Description:	Midway Sunset Cogen Letter to San Joaquin Valley Air Pollution Control District re Variance S-15-0SS Summary Report
Filer:	Mary Dyas
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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Docketed Date:	10/12/2021



May 11, 2015

CC-1905

Mr. Dave Baldwin
Supervising Air Quality Inspector
SJVAPCD Compliance Department
34946 Flyover Court
Bakersfield, CA 93308

Subject: Variance S-15-05S Summary Report

Dear Mr. Baldwin,

On December 20, 2013, MSCC was issued an Authority To Construct (ATC) from the District authorizing MSCC to retrofit Unit A with a GE developed DLN1+ Turndown Enhance (TE) combustion system. On February 11, 2015, MSCC was granted Short Variance S-15-05S for the testing and tuning of the retrofitted combustion system. MSCC's retrofit of Units A and B with DLN1+TE is a first time industry application and the emission data used for permitting and for the variance was primarily based on modeling and factory testing with minimal industrial experience. MSCC is pleased to inform the District that GE's emissions modeling and lab test results were proven out during the commissioning. The recorded NOx emissions were within GE's projected values and met the requirements of Variance S-15-05S.

The following is in response to Condition 8 of the District's recommendations for Short Variance S-15-05S (please see attached):

- A. A detailed summary of all work and activities conducted during the variance period;*

Please see the attached DLN1+Turndown Enhance Commissioning Procedure and the attached Commissioning Schedule.

- B. The date(s), time(s), and total duration that Unit A was undergoing commissioning;*

Unit A:

Wednesday, April 29, 2015: Commissioning from 1632 Hour to 1649 Hour. Duration of 17 minutes.

Thursday, April 30, 2015: Commissioning from 1008 Hour to 1717 Hour. Duration of 7 hours 9 minutes.

Friday, May 1, 2015: Commissioning from 1139 Hour to 2104 Hour.
Duration of 9 hours 25 minutes.

Saturday, May 2, 2015: Commissioning from 1030 Hour to 1707 Hour.
Duration of 6 hours 37 minutes.

Monday, May 4, 2015: Commissioning from 1005 Hour to 1602 Hour.
Duration of 5 hours 57 minutes.

Total duration that Unit A was undergoing commissioning: 26 hours 18 minutes.

C. A revised calculation of the excess emissions during the variance period;

The attached emissions data was recorded by a third party testing company, Montrose Environmental. Excess NOx emissions are calculated as described in the attached Staff Report for Docket NO: S-15-05S. Exemption of emissions by Rule 4703 for Startup and Shutdown were considered when evaluating CO emissions. All emissions data are recorded in standard time.

Wednesday, April 29, 2015:

Total NOx pounds 2.21 less daily limit of 410 pounds leaves zero excess pounds of NOx emissions.

Thursday, April 30, 2015:

Total NOx pounds 423.14 less daily limit of 410 pounds leaves 13.14 excess pounds of NOx emissions.

Friday, May 1, 2015:

Total NOx pounds 308.6 less daily limit of 410 pounds leaves zero excess NOx pounds of emissions.

Saturday, May 2, 2015:

Total NOx pounds 151.49 less daily limit of 410 pounds leaves zero excess pounds of NOx emissions.

Monday, May 4, 2015:

Total NOx pounds 148.57 less daily limit of 410 pounds leaves zero excess pounds of NOx emissions.

Total pounds of excess emissions during commissioning:

NOx: 13.14

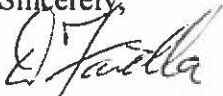
There were no recorded excess CO emissions not exempted by Rule 4703 Start Up and Shutdown.

D. *The required certification of truth, accuracy, and completeness, signed by the designated responsible official of the partnership, as required by Sections 9.13.1 and 10.0 of District Rule 2520-Federally Mandated Operating Permits.*
(see below)

Deviation Reports for each day that a Federal Title V permit condition was violated during the variance are included in the Variance Summary Report. No Deviation Report was submitted for April 29, 2015 because the recorded excess emissions were exempted by Rule 4703 Start Up and Shutdown. If you have any questions or comments please contact me at 661-768-3020 or Ray Smith at 661-768-3016.

I declare, that, based on information and belief formed after reasonable inquiry, the information provided in this letter is true, accurate and complete.

Sincerely,



Dave Faiella
Executive Director

cc: File CC-1905
G. Jans
S. Henriksen
B. Beebout (Aera)