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January 25, 2008

360346

Christopher Meyer
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET 07-AFC-4	
DATE	JAN 25 2008
RECD.	JAN 25 2008

Subject: Chula Vista Energy Upgrade Project (07-AFC-4)
Data Request Response to CEC Staff Data Requests 2, 3, 4, 5, and 25

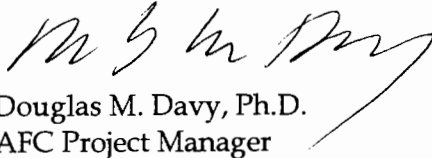
Dear Mr. Meyer:

Attached please find one original and 12 copies of MMC Energy, Inc. responses to California Energy Commission Staff Data Requests 2, 3, 4, 5, and 25 for the Application for Certification for the Chula Vista Energy Upgrade Project (07-AFC-04).

If you have any questions about this matter, please contact me at (916) 286-0278 or Sarah Madams at (916) 286-0249.

Sincerely,

CH2M HILL


Douglas M. Davy, Ph.D.
AFC Project Manager

Attachment

cc: S. Madams

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA**

**Application for Certification for the
CHULA VISTA ENERGY
UPGRADE PROJECT**

Docket No. 07-AFC-4

**PROOF OF SERVICE
(Revised 01/03/08)**

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 06-AFC-07
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

APPLICANT

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(CURE)**

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Gloria Smith

Suma Peesapati

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*** City of Chula Vista, California**

c/o Charles H. Pomeroy

Caren J. Dawson

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cpomeroy@mckennalong.com

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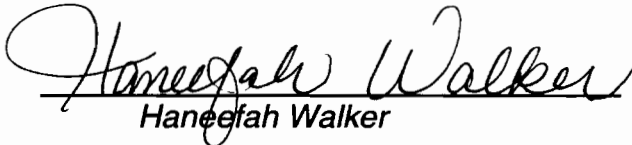
DECLARATION OF SERVICE

I, Haneefah Walker, declare that on January 25, 2008, I deposited the required copies of the attached Data Requests Response to CEC Staff Data Requests 2-5 and 25, filed in support of the Chula Vista Energy Upgrade Project (07-AFC-4) in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. I declare under penalty of perjury that the foregoing is true and correct.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.


Haneefah Walker
Haneefah Walker

Supplemental Filing

**Response to CEC Staff Data Requests
2-5, and 25**

In support of the

Application for Certification
for the

Chula Vista Energy Upgrade Project
Chula Vista, California
(07-AFC-4)

Submitted to the:
California Energy Commission

Submitted by:



With Technical Assistance by:



January 2008

Supplemental Filing

**Response to CEC Staff Data Requests
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In support of the

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Chula Vista, California
(07-AFC-4)

Submitted to the:

California Energy Commission

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With Technical Assistance by:



January 2008

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Attachments

- DR2-1 Total Run Hours for Chula Vista Power Plant, 2002-2007
- DR2-2 Source Test Data
- DR25-1 SDAPCD Cumulative Inventory

Introduction

Attached are MMC Energy Inc.'s (MMC) responses to California Energy Commission (CEC) Staff data requests 2 through 5, and 25 regarding the Chula Vista Energy Upgrade Project (07-AFC-4). The CEC Staff served the data requests on November 7, 2007, as part of the discovery process for the CVEUP project.

The responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as CEC Staff presented them and are keyed to the Data Request numbers (1 through 47). New or revised graphics or tables are numbered in reference to the Data Request number. For example, the first table used in response to Data Request 15 would be numbered Table DR15-1. The first figure used in response to Data Request 28 would be Figure DR28-1, and so on.

Additional tables, figures, or documents submitted in response to a data request or workshop query (supporting data, stand-alone documents such as plans, folding graphics, etc.) are found at the end of a discipline-specific section and are not sequentially page-numbered consistently with the remainder of the document, though they may have their own internal page numbering system.

Air Quality

Air Quality (DR2-5 and DR25)

FT8 Twinpac Turbine Information

2.
 - a. *Please provide fuel consumption data for the FT8 Twinpac turbines for the years 2004, 2005 and 2006.*
 - b. *Please provide emissions data, either from Continuous Emissions Monitors or by source tests for the emissions of NO_x, VOC, PM10, PM2.5 and Sox*
 - c. *Please provide an average annual emissions summary for the FT8 turbines based upon the fuel consumption data of Data Request 2a and the emissions data of Data Request 2b.*

Response: Hours of operation were obtained for the years 2001 through November 2007. During the years 2004 and 2005, the plant was in receivership and did not operate. The approximate hours of operation were:

2001	186 hours
2002	318 hours
2003	376 hours
2004	0 hours
2005	0 hours
2006	128 hours
2007	58 hours (ending November 2007)

Using the average of the last five-year of actual operation, not counting the period where the plant was in bankruptcy, the average is approximately 213 hours per year of operation. Please refer to Attachment DR2-1.

The source test data is also provided in Attachment DR2-2. The 2006 source test data was for NO_x, CO, VOC, and NH₃. No testing was completed for either PM10 or SO₂ nor is there data during turbine startup.

For estimating turbine startup emissions, it was assumed that the turbine would be controlled only with water injection for the first 30 minutes at 42 ppm for NO_x. CO, VOC, PM10, and SO₂ startup emissions assumed base loaded emissions. Thus, for NO_x, the startup emission rate for the first 30 minutes would be 59.09 lbs plus last 30 minutes at 5 ppm or 3.6 lbs for a total NO_x emission rate during a start of 62.7 lbs. Based on the average of the last two years of operation (213 hours), the emissions based on the 2006 source test data for NO_x, CO, VOC and the permitted limits for SO₂ and PM10, and assuming 36 hours of turbine startup we get the following amounts:

- NO_x 1.3 tpy
- CO 4.6 tpy
- VOC 0.07 tpy

- PM10 0.5 tpy
- SO₂ 0.2 tpy

Schedule for Offsets

3. Please discuss and provide a schedule as to when the applicant will provide a list of potential offsets that would partially or entirely mitigate the project’s NOx, PM10, PM2.5, VOC and SO_x emissions identified on p. DA-12

Response: The proposed mitigation will be calculated using a two-step process. The first step is to take the difference between the existing facility’s actual daily emissions and the potential daily emissions from the new facility and to multiply this by the estimated annual days of operation of the existing facility. This takes into account the removal of the existing facility when the new facility is constructed. For this calculation, the existing facility emissions are based on running time (213 annual hours of operation or approximately 6 hours per day times 36 days of operations) with 2006 source test data. The new facility’s operations are based on an assumed worst-case level of 10 hours a day for 1000 hours (100 days) of annual operation.

The second step in the process is to calculate the annual emissions of the proposed facility, based on the daily potential to emit of the new facility alone for 64 days of operation. This takes into account the length of time, 64 days out of 100 days, when the new plant would be operating that the existing plant would not.

Table DR3-1 lists, for each criteria pollutant, the emissions of the existing facility, operating an average of 6 hours per day and the proposed facility, operating an average of 10 hours per day, and the difference between their respective potentials to emit. This difference is the basis for calculating the offsets.

TABLE DR3-1
Existing Actual vs. New PTE Comparison (pounds per day, Assuming 6 Hours of Existing, and 10 hours of New Plant)

Pollutant	Current Facility at 6 Hours per Day ^a	Proposed Facility at 10 Hours per Day ^b	Difference ^c
NO _x	74.8	114.2	39.4
CO	256.8	140.2	-116.6
VOC	4.0	22.6	18.6
SO _x	9.5	20.0	10.5
PM ₁₀ /PM _{2.5}	27.2	60.0	32.8

^a Based on 6 hours of operation per day which includes one start based on actuals for NOx, CO, VOCs.

^b Based on 10 hours of operation per day which includes one start and potential emissions.

^c Approximate emissions increases and decreases in pounds per day.

To calculate offsets, the difference between the two facilities in pounds per day potential to emit (see “difference” column in Table DR3-1) is multiplied by 36 days. For the remaining 64 days that make up the 100 days per year of estimated new plant operation, the daily emissions from the proposed new facility, as shown in Table DR3-1, are multiplied by 64 days to produce an estimate of total annual emissions for the facility. Using the method

proposed above, and assuming the amount mitigated on a daily basis is the difference between emissions of the two facilities multiplied by 36 days of operation plus the emissions of the proposed facility multiplied by 64 days, the mitigation quantities would be:

NO _x	4.36 tons
VOC	1.05 tons
SO _x	0.83 tons
PM ₁₀ /PM _{2.5}	2.51 tons
Total	8.75 tons

Mitigation Fees

4. *Please discuss the amount of mitigation fees the applicant is willing to pay to the SDAPCD and the basis for calculating those fees.*

Response: To mitigate the emissions of non-attainment pollutants and their precursors, MMC Energy will set aside an air quality mitigation fund to add to the SDAPCD Carl Moyer Program that provides incentives for projects that will result in actual emission reductions from combustion sources.

MMC Energy proposes to fund the Carl Moyer program at a rate of \$20,000 per ton of pollutant, plus an administration fee. The total funds would then be based on 8.75 tons at \$20,000 per ton plus a 20 percent administration fee, totaling \$210,010.

SDAPCD use of Mitigation Fees

5. *Please discuss to which SDAPCD programs the fees would be applied*

Response: Based on the District’s previous practice with the Palomar Project, the fees would be applied to the SDAPCD Carl Moyer Program, but would be directed for the first two years towards projects that would directly benefit areas within the City of Chula Vista. After two years, if there are remaining funds available, the fees could be distributed throughout San Diego County.

Cumulative Project List

25. *Please provide a copy of the cumulative project list to be provided by SDAPCD as noted on Page DA-17 of the Data Adequacy Supplement.*

Response: The SDAPCD cumulative inventory is provided Attachment DR25-1. The inventory contains no information with regards to emissions or stack parameters. The SDAPCD requires the Applicant to review District files to obtain the necessary data. Some of these sources appear to be VOC-based emissions that are not included in cumulative analyses. The Applicant will work with the CEC Staff to establish which sources should be included in the cumulative analysis. Once this list is finalized, the appropriate stack parameters for the background cumulative sources will be obtained from District files.

Attachment DR2-1

Total Run Hours for Chula Vista Power Plant, 2002-2007

ATTACHMENT DR2-1

Gregory Darvin

From: Harry Scarborough [hscarborough@mmcenergy.com]
Sent: Wednesday, December 05, 2007 4:13 PM
To: Gregory Darvin
Subject: FW: Chula Vista

Harry Scarborough
Sr. VP Operations and Business Development
MMC Energy North America, LLC
11002 Ainswick Dr
Bakersfield, CA

661 664 7152
661 364 7946 (cell)
661 664 7102 (fax)

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From: Mark Wellard [mailto:mwellard@proenergyservices.com]
Sent: Wednesday, December 05, 2007 3:26 PM
To: Harry Scarborough
Subject: RE: Chula Vista

Harry,
The Total run Hours for Chula Vista in 2006 were 127.59 hrs
The Total Run hours through November 2007 are 57.72 Hrs
I verified these hours and they are from the Logbook not the Cems reports

Mark Wellard
ProEnergy Services
2031 Adams Rd
Sedalia, Missouri 65301
660-829-5100 office
660-829-1160 fax
660-281-1356 Cell

<http://www.proenergyservices.com>

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From: Harry Scarborough [mailto:hscarborough@mmcenergy.com]
Sent: Fri 11/30/2007 5:52 PM
To: Mark Wellard
Subject: Fw: Chula Vista

1/9/2008

Gregory Darvin

From: Donelle Griffin [dgriffi1@san.rr.com]
Sent: Wednesday, December 12, 2007 12:28 PM
To: Gregory Darvin
Cc: 'Harry Scarborough'; Everett; mwellard@proenergyservices.com
Subject: Re: Chula Vista Run Data

Greg,
Sorry to take so long to get back to you...I thought I had some of this electronically but had to go to site for hard copies and go through the log books (hard copies) from 2001 - 2003.

So,
I am dropping in the mail for you the RATA/Source Testing Data from Chula Vista from 2003 & 2006. The turbines were "cold steel" in 2004 & 2005.
From the log books the unit runtime in 2001 - 186 hours; 2002 - 132 hrs 44 min.; 2003 - 562 hrs. to the best of my interpretation from the chicken scratch.

The actual entries were
total hours : 186 (12/13/01)
total hours: 318 hrs. 44 min. (2/20/03 - no runs prior to that in 2003 so all 2002 hours)
total hours: 880 hrs. 24 min. (10/28/03)

That might actually translate out to 186 hours in 2001; 318 hours in 2002 and 376 hours in 2003 - depending on how they were thinking but I know the total from 2001 - 2003 was 880 hours 24 min. I understand you got the rest of the operational hours from Mark Wellard (2006 & 2007 to date).

I have no way of obtaining the gas used except with old CEMS data which I believe is still obtainable thru EMC (who did/does the EDR to the EPA). If anyone would have additional information you need it would be him, although I don't know what it would cost to obtain the data. Let me know if we need to pursue it further.

Best Regards,

Donelle Griffin
Environmental Consultant

Home Office 858-278-9170
Cell 858-354-4995
FAX 858-408-3496
dgriffil@san.rr.com

----- Original Message -----

From: "Gregory Darvin" <darvin@atmosphericdynamics.com>
To: <dgriffil@san.rr.com>
Cc: "'Harry Scarborough'" <hscarborough@mmcenergy.com>
Sent: Friday, November 30, 2007 4:55 PM
Subject: Chula Vista Run Data

> Donelle, thanks for your help with all of this.
>
> I am trying to establish a baseline for actual emissions at Chula Vista
> over
> the last five years. I understand the plant ran for a total 880 to date.
>
> What I need is the following:
>
> 1. Hours of operation by year.
> 2. Hours of operation by day and month
> 3. The recent source test data collected in 2006 for all pollutants
> 4. Fuel use data by year and day/month

> 5. CEMS data (which should have the fuel use data in it along with
> parametric monitoring data for VOC, PM10, and SO2)
>
> I know this is a large request. You can provide the data as you get it
> rather than giving it me all at once. My email and postal address is
> below.
>
> Again thank you for your help.
>
> Regards.
>
> Gregory S. Darwin
> Atmospheric Dynamics, Inc.
> 2925 Puesta del Sol
> Santa Barbara, CA 93105
> 805.569.6555
> 805.569.6558
> darvin@atmosphericdynamics.com
>
>
>
>
>

Attachment DR2-2

Source Test Data

2004

1.0 INTRODUCTION AND SUMMARY

Delta Air Quality Services (Delta) was contracted by MMC Energy Inc. to conduct annual permit renewal emissions performance testing on the stack and relative accuracy tests audits (RATAs) of the continuous emissions monitoring system (CEMS) serving a gas turbine power generating unit at MMC Energy Inc.'s Chula Vista Power Plant facility. Delta conducted the testing to comply with conditions contained in San Diego County Air Pollution Control District (SDAPCD) Permit to Operate. Dave Wonderly and Randy Monzon of Delta conducted the testing. Bob Bingham coordinated the testing for MMC Energy Inc. Larry Owusu from the San Diego APCD was present and witnessed all of the testing.

Permit renewal emissions tests were performed at the unit's stack during natural gas firing. Triplicate tests for the following emissions were performed:

- Oxides of Nitrogen (NO_x) concentration ppmv @ 15% O₂, dry;
- Carbon Monoxide (CO) concentration ppmv @ 15% O₂, dry;
- Ammonia concentration ppmv @ 15% O₂, dry;
- Volatile Organic Compounds (VOC) @ 15% O₂, dry;

The results of the renewal tests and RATAs are summarized in Tables 1-1 and 1-2 below. More detailed results can be found in Section 4.

**TABLE 1-1
RENEWAL TEST
RESULTS SUMMARY**

Parameter	Result	Limit
Oxides of Nitrogen (NO _x) concentration ppmv @ 15% O ₂ , dry	4.0	5 ppm
Carbon Monoxide (CO) concentration ppmv @ 15% O ₂ , dry	43	70 ppm
Ammonia concentration ppmv @ 15% O ₂ , dry	3.9	10 ppm
Volatile Organic Compounds (VOC) @ 15% O ₂ ,	0.7	2 ppm

**TABLE 1-2
RATA
RESULTS SUMMARY**

Parameter	Reference Method	CEM	Mean Difference	Relative Accuracy
NO _x , ppmC	3.87	3.93	-0.06	6.9
NO _x , lb/hr	6.93	7.21	-0.28	9.7
NO _x , lb/MMBtu	0.014	0.015	0.000	0.000
CO, ppmC	41.53	40.94	0.59	3.6
CO, lb/hr	45.33	45.72	-0.39	2.9

Note: NO_x, lb/MMBtu result is expressed in Absolute difference. Rab Limit = 10% or absolute difference of 0.02 lb/MMBtu (0.015 lb/MMBtu to make incentive)

1.1 TEST PROGRAM ORGANIZATION

Delta Air Quality Services Representative
Bob Finken
1845 N. Case Street

Orange, California 92865
Phone: (714) 279-6777
Fax: (714) 279-6781

San Diego County Air Pollution Control
District Contact
Suzanne Blackburn
9150 Chesapeake Drive
San Diego, California 92123-1095
Phone: (858) 650-4630
Fax: (858) 650-4658

MMC Energy Inc. Representative
Bob Bingham
Calpine Corp. Technical Consultant for
MMC Energy Inc.
1968 Don Lee Place
Chula Vista, CA 92092
Phone: (760) 291-1697
Fax:

2.0 UNIT DESCRIPTION

2.1 GAS TURBINE

The MMC Energy Inc. Chula Vista Project is a 36 MW "twin-pack" simple cycle gas turbine generator set consisting of two gas turbines directly coupled to one electric generator. The unit can only be operated while both gas turbines are in service. The turbines are equipped with Pratt & Whitney, model FT4/GG4 dry low-NO_x burners rated at 522 MMBtu/hr heat input. The gas turbines are equipped with selective catalytic reduction (SCR) utilizing aqueous ammonia as a reducing agent for NO_x control and an oxidation catalyst to control carbon monoxide emissions.

The plant is equipped with a Continuous Emissions Monitoring System (CEMS) that provides measurements of O₂, CO, and NO_x concentrations. It is an extractive system with a heated line extending from the probe to the sample conditioning unit. The CEMS is a packaged system provided by Environmental Monitoring Contractors. The system major components are presented in table 2-1.

TABLE 2-1
CONTINUOUS EMISSION MONITORING SYSTEM
MMC ENERGY INC.CHULA VISTA

Component	Manufacturer/ Model	Range
Sample Conditioner	Universal Analyzer 3050 SSP	NA
Filter Box	Universal Analyzer 270S	NA
NO _x monitor (high range)	TECO 42 CH	0-100 ppm
NO _x monitor (low range)	TECO 42 CH	0-10 ppm
CO monitor	TECO 48C	0-200 ppm
O ₂ monitor	Servomex 1440C	0-25 %
DAHS	ESC 8816, v. 5.28	NA
DAHS Software	E-DAS v. 3.5.0	NA

3.0 TEST DESCRIPTION

3.1 TEST CONDITIONS

The emissions testing was conducted while the unit was firing natural gas. During each test selected process parameters were recorded by the facility CEMS data acquisition system (DAS). A summary of the process operations during the tests is presented below in Table 3-1.

**TABLE 3-1
RENEWAL TEST PROCESS CONDITIONS**

Run/Parameter	Date	Start Time	End Time	Load, MW	Fuel Flow, Cdsch
1	6/7/2006	9:02	10:14	32.3	4820
2	6/7/2006	10:37	11:57	32.2	4803
3	6/7/2006	12:30	13:41	32.3	4815
4	6/7/2006	14:02	14:54	32.0	4781
5	6/7/2006	15:06	15:57	31.9	4769
6	6/7/2006	16:11	17:02	31.8	4761
7	6/7/2006	17:14	17:58	31.9	4762
8	6/7/2006	18:10	18:54	32.1	4791
9	6/7/2006	19:06	19:50	32.1	4803

3.2 SAMPLE LOCATIONS

All tests were conducted at the sample locations on the exhaust stack of the combustion turbine. The stack consists of a rectangular duct measuring 7'2" feet by 38 feet with nine sample ports running along its face. The sampling was conducted using an 18-point (9 x 2) grid sampled for 2 minutes per point for a total of 36 minutes of sampling time as requested by the APCD. The points selected according to EPA Method 1 using $\frac{3}{4}$ of the stack depth as the deep quarter has been proven to have no stack flow.

3.3 TEST PROCEDURES

The test procedures used are presented in Table 3-2. Triplicate tests were conducted for all species for the renewal tests with an additional seven runs for NO_x and CO only to complete the RATA. Detailed descriptions of standard test procedures are included in Appendix A. Additional details and issues specific to this test program are presented in Table 3-2 and the text that follows.

3.3.1 Continuous Gaseous Measurements

NO_x, O₂, CO, and CO₂ were measured according to SDCAPCD reference methods including the "high NO₂" procedures using Delta's continuous emissions monitoring system (CEMS). The sampling system employed a heated line and moisture removal trap to conserve any NO₂ that might be present in the flue gas. The CEMS system and test methods are described in detail in Appendix A.

The reference method measurements were performed using an 18-point (9 x 2) grid sampled for 2 minutes per point for a total of 36 minutes of sampling time as requested by the APCD. The data from the first run was used to investigate the NO₂ percentage of the total NO_x. This check indicated that the source was a "High NO₂" source as defined by SDAPCD.

**TABLE 3-2
TEST PROCEDURES FOR COMPLIANCE TEST PROGRAM**

Parameter	No of Runs	Measurement Principle	Reference Method	Comments
NO _x	3	Chemiluminescence	SDCAPCD Method 100	18-point traverse
CO	3	Non-Dispersive Infrared	SDCAPCD Method 100	18-point traverse
O ₂	3	Electrochemical Cell	SDCAPCD Method 100	18-point traverse
NH ₃	3	Colorimetric	South Coast AQMD 207.1	18-point traverse
VOC	3	Gas Chromatography Flame Ionization Photoionization	SDCAPCD Method 18	18-point traverse

3.3.2. Ammonia

The ammonia concentration in the stack gases were measured using SCAQMD 207.1. The samples were collected using a 18 point traverse. The sampling system is described in Appendix A.

3.3.3 Volatile Organic Compounds

Integrated VOC samples were collected into new Tedlar bags using a "lung" type sampler. The bags were purged before collection of the sample. The samples were collected using a 27-point traverse. Once collected the samples were analyzed for C₁ to C₆₊ by GC/FID within 72 hours of collection using SDCAPCD Method 18 analytical procedures. Results were reported as total non-methane, non-ethane organic compounds as carbon from the C₃ – C₆ data.

3.4 TEST SCHEDULE

The test program was conducted on June 7, 2006.

4.0 RESULTS

The Results of the renewal tests are presented in Table 4-1 below. Raw field and laboratory data along with calculation summaries can be found in the appendices.

**TABLE 4-1
MMC ENERGY NORTH AMERICA
CHULA VISTA UNIT 1
TEST RESULTS**

Date		6/7/2006	6/7/2006	6/7/2006		
Start Time		9:02	10:37	12:30		
End Time		10:14	11:57	13:41		
Parameter	Units	Run 1	Run 2	Run 3	Average	Limit
Oxygen (O ₂)	%	16.69	16.82	16.80	16.77	—
Oxides of Nitrogen (NO _x)	ppmv	3.0	2.7	2.7	2.8	—
Oxides of Nitrogen (NO _x)	ppmv @ 15% O ₂	4.2	4.0	3.9	4.0	5
Oxides of Nitrogen (NO _x)	lb/hr	7.5	7.1	6.9	7.2	—
Carbon Monoxide (CO)	ppm	28.2	27.5	26.2	27.3	—
Carbon Monoxide (CO)	ppmv @ 15% O ₂	39.4	39.8	37.7	39.0	70
Carbon Monoxide (CO)	lb/hr	43.5	43.7	41.3	42.8	—
VOC	ppm	0.48	0.54	0.44	0.49	—
VOC	ppmv @ 15% O ₂	0.70	0.79	0.63	0.71	2
Ammonia (NH ₃)	ppm	2.4	2.7	3.0	2.7	—
Ammonia (NH ₃)	ppmv @ 15% O ₂	3.5	3.9	4.3	3.9	10

The results of the RATA tests are contained in tables 4-2 through 4-6 below.

TABLE 4-2
MMC ENERGY NORTH AMERICA
CHULA VISTA UNIT 1
RATA RESULTS
NO_x, PPM @ 15% O₂

Test	Date	Time		RM	CEMS	Difference	Valid Run (1=yes, 0=no)
		Start	End Time	ppmC	ppmC	ppmC	
1	6/7/2006	9:02	10:14	4.2	3.9	0.26	1
2	6/7/2006	10:37	11:57	4.0	4.1	-0.10	1
3	6/7/2006	12:30	13:41	3.9	4.0	-0.10	1
4	6/7/2006	14:02	14:54	3.5	3.4	0.10	1
5	6/7/2006	15:06	15:57	3.7	3.6	0.13	1
6	6/7/2006	16:11	17:02	3.5	4.0	-0.49	1
7	6/7/2006	17:14	17:58	3.8	4.1	-0.26	1
8	6/7/2006	18:10	18:54	4.0	4.4	-0.35	1
9	6/7/2006	19:06	19:50	4.2	4.0	0.23	1
Average				3.87	3.93	-0.06	

Ref. Method Average: 3.87 ppmC
 Average Difference: -0.06 ppmC
 Number of Tests: 9
 Standard Deviation: 0.26 ppmC
 t Value: 2.306
 Confidence Coefficient: 0.20 ppmC
 Relative Accuracy: 6.93 %
 Bias Adjustment Factor: 1.000
 Test Condition: 32.3 MW

**TABLE 4-3
MMC ENERGY NORTH AMERICA
CHULA VISTA UNIT 1
RATA RESULTS
NO_x, LB/HR**

Test	Date	Start	Time End Time	RM lb/hr	CEMS lb/hr	Difference lb/hr	Valid Run (1=yes, 0=no)
1	6/7/2006	9:02	10:14	7.53	7.28	0.25	1
2	6/7/2006	10:37	11:57	7.11	7.55	-0.44	1
3	6/7/2006	12:30	13:41	6.94	7.39	-0.45	1
4	6/7/2006	14:02	14:54	6.34	6.22	0.12	1
5	6/7/2006	15:06	15:57	6.64	6.51	0.13	1
6	6/7/2006	16:11	17:02	6.24	7.29	-1.05	1
7	6/7/2006	17:14	17:58	6.80	7.41	-0.61	1
8	6/7/2006	18:10	18:54	7.13	7.98	-0.85	1
9	6/7/2006	19:06	19:50	7.67	7.30	0.37	1
Average				6.93	7.21	-0.28	

Ref. Method Average: 6.93 lb/hr
 Average Difference: -0.28 lb/hr
 Number of Tests: 9
 Standard Deviation: 0.51 lb/hr
 t Value: 2.306
 Confidence Coefficient: 0.39 lb/hr
 Relative Accuracy: 9.7 %
 Bias Adjustment Factor: 1.000
 Test Condition: 32.3 MW

**TABLE 4-4
MMC ENERGY NORTH AMERICA
CHULA VISTA UNIT 1
RATA RESULTS
NO_x, LB/MMBTU**

Test	Date	Time		RM lb/MMBtu	CEMS lb/MMBtu	Difference lb/MMBtu	Valid Run (1=yes, 0=no)
		Start	End Time				
1	6/7/2006	9:02	10:14	0.015	0.015	0.000	1
2	6/7/2006	10:37	11:57	0.015	0.015	0.000	1
3	6/7/2006	12:30	13:41	0.014	0.015	-0.001	1
4	6/7/2006	14:02	14:54	0.013	0.013	0.000	1
5	6/7/2006	15:06	15:57	0.014	0.013	0.001	1
6	6/7/2006	16:11	17:02	0.013	0.015	-0.002	1
7	6/7/2006	17:14	17:58	0.014	0.015	-0.001	1
8	6/7/2006	18:10	18:54	0.015	0.016	-0.001	1
9	6/7/2006	19:06	19:50	0.016	0.015	0.001	1
Average				0.014	0.015	0.000	

Ref. Method Average: 0.014 lb/MMBtu
 Average Difference: 0.000 lb/MMBtu
 Number of Tests: 9
 Standard Deviation: 0.001 lb/MMBtu
 t Value: 2.306
 Confidence Coefficient: 0.001 lb/MMBtu
 Absolute difference: 0.000 lb/MMBtu
 Bias Adjustment Factor: 1.000
 Test Condition: 32.3 MW

Rab Limit = 10% or absolute difference of 0.02 lb/MMBtu (0.015 lb/MMBtu to make incentive)

TABLE 4-5
MMC ENERGY NORTH AMERICA
CHULA VISTA UNIT 1
RATA RESULTS
CO, PPM @ 15% O₂

Test	Date	Time		RM ppmC	CEMS ppmC	Difference ppmC	Valid Run (1=yes, 0=no)
		Start	End Time				
1	6/7/2006	9:02	10:14	39.4	40.4	-0.98	1
2	6/7/2006	10:37	11:57	39.8	39.5	0.31	1
3	6/7/2006	12:30	13:41	37.7	37.7	0.01	1
4	6/7/2006	14:02	14:54	41.4	40.8	0.65	1
5	6/7/2006	15:06	15:57	41.8	40.7	1.09	1
6	6/7/2006	16:11	17:02	42.3	41.2	1.11	1
7	6/7/2006	17:14	17:58	45.2	42.2	3.02	1
8	6/7/2006	18:10	18:54	42.6	41.9	0.74	1
9	6/7/2006	19:06	19:50	43.6	44.3	-0.65	1
Average				41.53	40.94	0.59	

Ref. Method Average: 41.53 ppmC
 Average Difference: 0.59 ppmC
 Number of Tests: 9
 Standard Deviation: 1.17 ppmC
 t Value: 2.306
 Confidence Coefficient: 0.90 ppmC
 Relative Accuracy: 3.58 %
 Bias Adjustment Factor: 1.000
 Test Condition: 32.3 MW

**TABLE 4-6
MMC ENERGY NORTH AMERICA
CHULA VISTA UNIT 1
RATA RESULTS
CO, LB/HR**

Test	Date	Start	Time		RM lb/hr	CEMS lb/hr	Difference lb/hr	Valid Run (1=yes, 0=no)
			End Time					
1	6/7/2006	9:02	10:14		43.45	45.40	-1.95	1
2	6/7/2006	10:37	11:57		43.68	44.20	-0.52	1
3	6/7/2006	12:30	13:41		41.30	42.30	-1.00	1
4	6/7/2006	14:02	14:54		45.03	45.40	-0.37	1
5	6/7/2006	15:06	15:57		45.34	45.30	0.04	1
6	6/7/2006	16:11	17:02		45.86	45.70	0.16	1
7	6/7/2006	17:14	17:58		49.00	46.80	2.20	1
8	6/7/2006	18:10	18:54		46.44	46.80	-0.36	1
9	6/7/2006	19:06	19:50		47.91	49.60	-1.69	1
Average					45.33	45.72	-0.39	
Ref. Method Average:					45.33	lb/hr		
Average Difference:					-0.39	lb/hr		
Number of Tests:					9			
Standard Deviation:					1.21	lb/hr		
t Value:					2.306			
Confidence Coefficient:					0.93	lb/hr		
Relative Accuracy:					2.9	%		
Bias Adjustment Factor:					1.000			
Test Condition:					32.3	MW		

Attachment DR25-1
SDAPCD Cumulative Inventory

ID_NUM	ID_CODE	L_DBA	L_ST_NUM	L_ST_NAME	L_CITY	L_STATE	L_ZIP
253 A		NATL STEEL & SHIPBUILDING A GENERAL DYNAMICS CO		28TH ST & HARBOR DR	SAN DIEGO	CA	921130000
2643 A		USN SUBMARINE BASE		SAN ONOFRE ARD 30 PIER 5002	SAN DIEGO	CA	919320000
2643 A		USN SUBMARINE BASE		SAN ONOFRE ARD 30 PIER 5002	SAN DIEGO	CA	919320000
4845 A		USN NAV STA 1 SCE		NAVAL STATION	SAN DIEGO	CA	921360000
4985 A		FIRST FLIGHT CORP	6810	CURRAN ST	SAN DIEGO	CA	921540000
5913 A		PROPULSION CONTROLS ENGINEERING	1304	SAMPSON ST	SAN DIEGO	CA	921130000
8561 A		SHIPYARD SUPPLIES COASTAL COATINGS INC	1809	MAIN ST	SAN DIEGO	CA	921130000
8974 A		Q E D SYSTEMS INC	1330	30TH ST #D	SAN DIEGO	CA	921540000
9272 A		IMPERIAL BEACH CITY OF PWD	865	IMPERIAL BEACH BL	IMPERIAL BEACH	CA	919320000
9949 A		PACIFIC YACHT REFITTERS INC	997	G ST	CHULA VISTA	CA	919100000
10200 A		IRONWOOD FURNITURE MFG	3192	COMMERCIAL ST	SAN DIEGO	CA	921130000
10471 A		DEFENSE COMMISSARY AGENCY		NAVAL BASE SAN DIEGO	SAN DIEGO	CA	921360000
10590 A		OTAY WATER DISTRICT		MAXWELL (CROSS ST MAIN)	CHULA VISTA	CA	919110000
10654 A		BRIGHTON PLACE SPRING VALLEY	9009	CAMPO RD	SPRING VALLEY	CA	919770000
10670 A		CLANCY CONTRACTING SERVICES	825	HOLLISTER ST #M	SAN DIEGO	CA	921540000
10674 A		CAFE MOTO	2619	NATIONAL AV	SAN DIEGO	CA	921130000
10722 A		OTAY LAKES SURGERY CENTER	955	LANE AV	CHULA VISTA	CA	919140000
10736 A		MACY'S	2015	BIRCH RD	CHULA VISTA	CA	919150000
10738 A		GREENBRIAR LAWN & TREE CARE CO INC	3616	BANCROFT DR	SPRING VALLEY	CA	919770000
10763 A		EUCLID ENDOSCOPY CENTER	286	EUCLID AV	SAN DIEGO	CA	921140000
10775 A		PRECISION AUTOBODY COLLISION	989	PALM AV	IMPERIAL BEACH	CA	919320000
10817 A		NAVIGATIONAL SERVICES INC	155	35TH ST W #B	NATIONAL CITY	CA	919500000
10825 A		ELITE AUTO BODY AND PAINT	3626	MAIN ST	SAN DIEGO	CA	921130000
10830 A		MERYVNS LLC	3007	HIGHLAND AV	NATIONAL CITY	CA	919500000
10835 A		CUSTOMS AND BORDER PROTECTION (CBP)		ARNIE'S POINT	CHULA VISTA	CA	919140000
10848 A		CHULA VISTA CITY OF FIRE DEPT	1180	WOODS DR	CHULA VISTA	CA	919150000
10894 A		ALBERTSONS #6759	2310	PROCTOR VALLEY	CHULA VISTA	CA	919110000
10930 A		HARVEST MEAT CO INC	1022	BAY MARINA DR	NATIONAL CITY	CA	919500000
10964 A		DEPT OF THE NAVY		IB OUTLYING LANDING FIELD	IMPERIAL BEACH	CA	919320000
10970 A		AMVETS THRIFT STORE #19	999	CARDIFF ST	SAN DIEGO	CA	921140000
11006 A		OTAY RANCH TOWN CENTER	2015	BIRCH RD	CHULA VISTA	CA	919150000
11006 A		OTAY RANCH TOWN CENTER	2015	BIRCH RD	CHULA VISTA	CA	919150000
11161 A		CALTRANS	1881	BIRCH RD	CHULA VISTA	CA	919140000
11162 A		CALTRANS	1978	BIRCH RD	CHULA VISTA	CA	919140000
11169 A		CALTRANS	2186	OTAY LAKES RD	CHULA VISTA	CA	919140000
11170 A		CALTRANS	2115	OTAY LAKES RD	CHULA VISTA	CA	919140000
95596 A		OTAY WATER DISTRICT	1230	EASTLAKE PY	CHULA VISTA	CA	919150000

NOTES:

* The list above is of newly permitted equipment or applications located in the following zip codes: 91902, 91910, 91913, 91914, 91915, 91932, 91950, 91977, 91978, 92113, 92114, 92118, 92136, 92139, 92154, 92155, and 92173. The actual facility may not fall within the 8 mile radius, and represents only new stationary source emissions requiring a SDAPCD permit or registration. State registered engines and other state registered sources are not included. Permit applications for equipment modifications that may result in an increase or decrease in emissions are also not included. Actual emissions inventories do not exist for the above equipment.

New Permits or Applications in Process*

ID_NUM	ID_CODE	PP_AP_AP_NU	PP_AP_ED_EQUIP_DESC	PO_NUM
253 A				
2643 A			983942 IC ENGINE, CUMMINS, S/N TBD, MODEL QSX15-G9 NR2, DIESEL, 668 HP	
2643 A			985354 CATERPILLAR DIESEL ENGINE MODEL C27 HP RATING 1,141	
4845 A			985355 CATERPILLAR DIESEL ENGINE MODEL C27 HP RATING 1068	
4965 A			985109 JOHN DEERE DIESEL ENGINE MODEL 4045TF270 HP RATING 99	984293
5913 A			984293 SELF SERVE	980736
8561 A			980736 MARINE COATING OPERATION BRUSH ROLLER NON REFILLABLE HAND HELD AEROSOL	
8974 A			983232 TWO GRACO AIRLESS PUMPS EACH W/ TWO NOZZLES	978744
9272 A			984092 MARINE COATING APPLICATION	984933
9949 A			984933 KOHLER JOHN DEERE DIESEL ENGINE MODEL 250REDZJD 250 KW	981661
10200 A			981661 MARINE COATING OPERATION	982624
10471 A			982624 WOOD PARTS/PRODUCTS APPLICATION STATION	984905
10590 A			984905 IC ENGINE FORD MODEL WSG1068, S/N 08Z551562.	
10654 A			983758 IC ENGINE CATERPILLAR MODEL G3516TA/130, S/N NOT AVAIL; 1048HP, 740KW.	983918
10670 A			983918 IC ENGINE-JOHN DEERE MDL# 6068HF275L DIESEL 220 HP S/N PE6068H360361	983937
10674 A			985469 ABRASIVE BLASTING POT/MACHINE MODEL 1-9 DEZ S/N 27040070 HP 9.39	983944
10722 A			983944 COFFEE ROASTER	984099
10736 A			984099 IC ENGINE, CUMMINS, S/N TBD, MODEL QSL9-G2, DIESEL, 249 HP	984121
10738 A			984121 IC ENGINE, JOHN DEERE, S/N TBD, MODEL 4045TF270, DIESEL	984122
10763 A			984122 GASOLINE DISPENSING FACILITY	984191
10775 A			984191 JOHN DEERE DIESEL STANDBY ENGINE MODEL 3029TF270 HP RATING 64	984228
10817 A			984228 SPRAY BOOTH WITH HVLP EQUIP EXHAUSTED THROUGH PAINT POCKET FILTER MEDIA.	
10825 A			984376 MARINE COATING OPERATION.	984407
10830 A			984407 AUTOMOTIVE APPLICATION STATION SATA MODEL JET 2000	984420
10835 A			984420 S/N UNIT ON ORDER; 150 HP WILL UTILIZE BACKUP PROPANE.	984435
10848 A			984435 IC ENGINE GENERAL MODEL 0046267; S/N 4356149, 80HP, NATURAL GAS.	984470
10884 A			984470 IC ENGINE JOHN DEERE MODEL 3029TF270, S/N TBA. 64HP	984590
10930 A			984590 IC ENGINE KOHLER MODEL 45RZG, S/N TBD, NATURAL GAS 60HP	984686
10964 A			984686 IC ENGINE, GENERAL MOTORS, S/N 0774556, MODEL 60RZG, NATURAL GAS, 105 HP	984755
10970 A			984755 IC ENGINE GM MODEL VORTECS.7L, S/N UNAVAILABLE.	984778
11006 A			984778 GM NATURAL GAS ENGINE MODEL 4.3L V6 VORTEC S/N 102LXT10730444 HP RATING 56	984817
11006 A			984817 IC ENGINE, CUMMINS, S/N TBD, MODEL 6BTAS.9G4, DIESEL, 170 HP	984817
11161 A			984817 IC ENGINE, CUMMINS, S/N TBD, MODEL QSL9-G2, DIESEL, 325 HP	985188
11162 A			985188 IC ENGINE GENERAC/DEERE MODEL 4045HF285, DIESEL.	985189
11169 A			985189 IC ENGINE GENERAC/DEERE MODEL 4045HF285, DIESEL.	985197
11170 A			985197 IC ENGINE GENERAC/DEERE MODEL 4045HF285, DIESEL.	985196
95596 A			983376 IC ENGINE, CATERPILLAR, S/N GZS00307, MODEL 3516B, DIESEL, 2847 HP	983376

New Permits or App' Jobs In Process*

ID_NUM	ID_CODE	PP_PO_ED.EQUIP_DESC	AP_TYPE	PO_APPROVED_DATE	AC_ISSUED_DATE	CONST_COMPLETE_DATE
253 A			N		16-Aug-06	21-Aug-06
2643 A			N		08-Aug-07	19-Oct-07
2643 A			N		08-Aug-07	19-Oct-07
4845 A			N		04-Apr-07	05-May-07
4965 A		AVGAS DISPENSING FACILITY:	N	29-May-07	15-Sep-06	30-Jan-07
5913 A		MARINE AND METAL PARTS & PRODUCTS COATING OPERATION (<3 GAL/DAY AND	N	21-Feb-07	03-May-06	11-Sep-06
8561 A			N		12-Jan-06	17-Mar-06
8974 A		PORTABLE MARINE COATING OPERATION: CONSISTING OF: TWO(2) GRACO MODEL 243283,	N	08-Feb-05	25-Oct-06	10-Apr-07
9272 A		EMERGENCY DIESEL ENGINE: JOHN DEERE MODEL 6090HF485, S/N R66090L014927,	N	28-Nov-07	28-Jun-07	15-Aug-07
9949 A		MARINE COATING OPERATION (PORTABLE, TYPE I): CONDUCTED ON MARINE VESSELS,	N	05-Jul-07	24-May-06	30-Jun-06
10200 A		WOOD PRODUCTS COATING OPERATION: ONE (1) CUSTOM BUILT OPEN-FACED PAINT	N	23-May-07	13-May-05	14-Apr-07
10471 A		EMERGENCY ENGINE: FORD, MODEL WSG 1068, NATURAL GAS FIRED, 137 BHP,	N	02-Mar-07	06-Feb-07	12-Feb-07
10590 A			N		21-Jun-06	21-Mar-07
10654 A		EMERGENCY STANDBY ENGINE: JOHN DEERE MODEL 6068HF275, S/N PE606511360361,	N	04-May-06	14-Feb-06	27-Apr-06
10670 A		ASBESTOS ABATEMENT SOLVENT OPERATION: THE CONTROLLED APPLICATION OF	N	12-Aug-06	21-Sep-07	07-Jun-07
10674 A		COFFEE ROASTER: MAKE JABEZ BURNS, MODEL 15R, S/N 1103, 800 LBS/HOUR	N	15-Oct-07	07-Feb-06	01-Jul-07
10722 A		EMERGENCY DIESEL ENGINE: CUMMINS QSL9-G2, S/N 46584141, 364 BHP,	N	26-Mar-07	11-Apr-06	11-Jun-06
10736 A		EMERGENCY STANDBY ENGINE: JOHN DEERE DIESEL ENGINE, MODEL 4045TF270, S/N	N	29-May-07	17-Mar-06	01-Sep-06
10738 A		GASOLINE DISPENSING FACILITY (NON-RETAIL): ONE (1) EMCO WHEATON 4005	N	28-Sep-06	11-May-06	07-Jun-06
10763 A		EMERGENCY DIESEL ENGINE: JOHN DEERE 3029TF270, S/N PE3029T575795, 64 BHP,	N	16-Oct-06	25-Apr-06	07-Aug-06
10775 A		AUTOMOTIVE REFINISHING OPERATION: ONE (1) GLOBAL FINISHING SOLUTIONS	N	26-Oct-06	25-May-06	03-Oct-06
10817 A			N		12-Jul-06	12-Jul-06
10825 A		AUTOMOTIVE REFINISHING OPERATION: ONE (1) BLEEKER BROS. MODEL WD PF-8-10-20	N	03-May-07	31-May-06	19-Jan-07
10830 A		EMERGENCY STANDBY ENGINE: GENERAL MOTORS ENGINE, MODEL INDUSTRIAL POWER-	N	23-Jul-07	20-Oct-06	01-Sep-06
10835 A		EMERGENCY STANDBY ENGINE: GENERAC ENGINE; FUELED WITH PROPANE GAS, MODEL	N	02-Oct-06	30-Jun-06	25-Jul-06
10848 A		INTERNAL COMBUSTION ENGINE: MAKE: JOHN DEERE: MODEL: 3029TF270. SERIAL NO.:	N	22-Jan-07	14-Dec-06	01-Nov-06
10884 A		EMERGENCY ENGINE: GENERAL MOTOR VORTEC 4.3L, S/N GMT2552422, NATURAL GAS	N	25-May-07	31-Jan-07	06-Apr-07
10930 A		EMERGENCY STANDBY ENGINE: 105 NATURAL GAS, GEN.MOTORS/INDUSTRIAL POWERTRAIN	N	01-Oct-07	01-Mar-07	09-Mar-07
10964 A		EMERGENCY PROPANE ENGINE: GENERAL MOTORS MODEL VORTEC 5.7L, 105 BHP,	N	25-Oct-07	10-Jan-07	28-Sep-07
10970 A		EMERGENCY ENGINE: GENERAL MOTORS 4.3L-V6-VORTEC, NATURAL GAS FIRED,	N	23-Feb-07	11-Dec-06	14-Dec-06
11006 A		EMERGENCY STANDBY ENGINE: CUMMINS DIESEL ENGINE, MODEL 68TA.9-G4, S/N	N	06-Apr-07	06-Mar-07	27-Oct-06
11006 A		EMERGENCY STANDBY ENGINE: CUMMINS DIESEL ENGINE, MODEL 68TA.9-G4, S/N	N	06-Apr-07	06-Mar-07	27-Oct-06
11161 A		EMERGENCY DIESEL ENGINE: JOHN DEERE 4045HF285J, S/N: PE4045L006493, 126 HP,	N	05-Nov-07	04-Sep-07	31-Aug-07
11162 A		EMERGENCY DIESEL ENGINE: JOHN DEERE 4045HF285J, S/N: PE4045L006481, 126 HP,	N	05-Nov-07	04-Sep-07	31-Aug-07
11169 A		EMERGENCY STANDBY ENGINE: JOHN DEERE DIESEL ENGINE, MODEL 4045HF275, S/N	N	05-Nov-07	18-Jun-07	01-Oct-07
11170 A		EMERGENCY STANDBY ENGINE: JOHN DEERE DIESEL ENGINE, MODEL 4045HF275, S/N	N	05-Nov-07	18-Jun-07	30-Sep-07
95596 A		EMERGENCY STANDBY ENGINE: CATERPILLAR DIESEL ENGINE, MODEL 3516B DITA,	N	04-Apr-06	23-Nov-05	06-Mar-06

