

**PETITION FOR VARIANCE  
BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

PETITIONER: AES ALAMITOS, LLC

CASE NO: \_\_\_\_\_

FACILITY ID: 115394

FACILITY ADDRESS: 690 North Studebaker Road  
**[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]**

City, State, Zip: Long Beach, CA 90803

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM     SHORT     REGULAR     EMERGENCY     EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Jose Perez

Noah Perch-Ahern

Director of Operations

Partner

690 North Studebaker Road

Greenberg Glusker LLP

Long Beach                      Zip    90803

2049 Century Park East, Ste. 2600 Zip    90067

☎ (310) 318-7575                      Ext.

☎ (310) 201-7484                      Ext.

Fax (562) 558-4810

Fax (310) 201-4441

E-mail jose.perez@aes.com

E-mail nperchahern@ggfirm.com

3. RECLAIM Permit     Yes     No

Title V Permit     Yes     No

***Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at [clerkofboard@aqmd.gov](mailto:clerkofboard@aqmd.gov).***

***If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.***

**[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]**

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

AES Alamos, LLC (AES) is requesting interim and short variances from permit condition D12.11 of its Title V permit (excerpt of condition attached hereto as "Attachment A") regarding the allowable monthly average pressure differential limit for the facility's two Selective Catalytic Reduction (SCR) units (excerpts of applicable equipment attached hereto as "Attachment B").

This variance would not result in increased or excess emissions. The differential pressure limit is designed to provide an indication of when maintenance (e.g., cleaning of the SCR catalyst) of the SCR units may be required. The likely exceedance of this limit has not resulted in performance issues of the SCR that would affect or increase the facility's nitrogen oxides (NOx) limit or other emissions limits, and AES has a scheduled outage in April during which it will perform the necessary maintenance and return to compliance with the differential permit limit.

As described below, AES satisfies the factors for "good cause" outlined in the "Rules and Procedures of the South Coast Air Quality Management District Hearing Board, Appendix 1 – Good Cause Guidelines."

(1) Petitioner is in violation of Section 41701, or of any rule, regulation or order of the District, or that such violation is imminent

AES anticipates a likely exceedance of the allowable monthly average pressure differential limit (1.6 inches water column) for two SCR units (C170 and C178) required by permit condition D12.11 of its Title V permit for January 2024 based on current recorded measurements for the month.

(2) The circumstances leading to the violation could not reasonably have been avoided by Petitioner, or anticipated in sufficient time to provide for public notice of the variance hearing.

AES is not yet in violation of its Title V permit but is acting proactively and preemptively to avoid becoming noncompliant with the monthly monitoring average set forth in permit condition D12.11. Based on average monitoring results for the month to date, AES concluded during the week of January 15, 2024 that it would likely not meet the permit condition.

Exceedance of the allowable pressure differential limit cannot be avoided without undue burden and unreasonable costs because avoiding the violation would require an outage of the facility spanning at least three days to complete necessary maintenance, incurring substantial economic loss currently estimated at over \$1 million and an unplanned loss of electricity supply to the power grid. Such burden is particularly unreasonable considering an upcoming scheduled outage in April during which AES will perform maintenance on the generating units and associated SCR as part of periodic major overhauls. Please see further analysis under factor (4) below.

Providing public notice at this stage would likely require AES to become noncompliant as of January 31, 2024 based on the monthly monitoring average for January 2024. Due to the notice requirements for a short variance petition, a hearing for this matter would likely not occur until at least 15 days from the date of filing of this petition, at the earliest, which would be after AES's anticipated date of noncompliance. By requesting interim and short variances, AES seeks to avoid noncompliance between January 31, 2024 and April 2024.

(3) Petitioner exercised diligence in petitioning for the interim variance and scheduling the interim variance hearing: "diligence in petitioning for the variance" shall mean that Petitioner filed a variance petition as soon as feasible after the time Petitioner knew or should have known that a variance would, more likely than not, be needed.

During the week of January 15, 2024, AES concluded that it would likely exceed the average monitoring limit associated with permit condition D12.11. AES is submitting this petition as early as feasible following this determination and prior to becoming noncompliant.

(4) A denial of the interim variance will result in either: (a) An increase in the emissions of air pollutants, an adverse impact to air quality, and/or an adverse impact on public health or welfare; or (b) An unreasonable and unavoidable adverse impact to Petitioner.

A denial of the interim variance would result in unreasonable and unavoidable adverse impact to AES because it would require AES to perform an outage spanning at least three days of both CCGTs until it can perform and complete necessary maintenance, thereby causing the incurrence of substantial economic loss estimated at over \$1 million and an unplanned loss of electricity supply to the power grid. At the same time, the potential noncompliance at issue is not expected to result in any increased emissions.

In sum, AES satisfies each element of the necessary showing of “good cause” to justify the holding of a hearing on this petition in the absence of notice to the public.

5. Briefly describe the type of business and processes at your facility.

Combined cycle gas turbine electric power generation.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Selective Catalytic Reduction (SCR), No. CCGT-1	608431	C170	N/A
Selective Catalytic Reduction (SCR), No. CCGT-2	608432	C178	N/A

\*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The two high-efficiency 237-MW combined cycle gas turbine generators (CCGTs) at AES Alamos are each installed with an SCR unit to reduce NOx emissions with ammonia injection. Pressure gauges are installed at the inlet and outlet of each SCR catalyst bed to continuously monitor pressure differential across the SCR catalyst bed per Permit Condition D.12.11. SCR unit (C170) is connected to gas turbine CCGT-1 (D165), and SCR unit (C178) is connected to gas turbine CCGT-2 (D173).

Increased pressure differential across the SCR catalyst bed will not impact stack emissions from the gas turbines. Differential pressure monitoring is simply performed to indicate when system maintenance may be appropriate. Such maintenance is scheduled in April and the SCR system’s performance is not expected to be impaired in any manner by virtue of the increased differential pressure issue.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes  No

If yes, how often: See below Date of last maintenance and/or inspection 02/26/2023

Describe the maintenance and/or inspection that was performed.

The transmitter of the pressure gauges installed for the SCR units is calibrated at least once every 12 months per Permit Condition D12.11, and the differential pressure level across the SCR catalyst bed is continuously monitored for each unit. Maintenance of the SCR catalyst for both SCR units is performed as needed based on indications warranting such maintenance. The last inspection and maintenance were performed on February 26, 2023 during the annual plant-wide planned outage, and the next maintenance has been scheduled to take place during the 2024 plant-wide planned outage in April 2024.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
3002(c) – Title V Permit [Permit Condition D12.11]	Permit condition D12.11: Temporarily exceed the monthly average Pressure Differential limit of 1.6 inches water column for both Selective Catalytic Reduction (SCR) units (i.e., C170 and C178) between January 31, 2024 and April 2024.
3002(c) – Title V Permit [Section E.2, E.5]	There will be a deviation in the permitted operations of the SCR units once the monthly average SCR pressure differential exceeds the permitted limit. This will not impact emissions and AES is not seeking relief from permit conditions related to emissions limits.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes  No

Case No.	Date of Action	Final Compliance Date	Explanation
N/A			

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes  No

Case No.	Date of Action	Final Compliance Date	Explanation
N/A			

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes  No

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes  No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

Correcting the exceedance of the pressure differential limit would require, at a minimum, a three-day outage of the CCGTs in order to perform and complete the necessary maintenance. Performing an unforeseen outage at this time would be especially burdensome considering AES has already scheduled a major maintenance outage in April. AES instead proposes completing necessary maintenance of the SCR units during the maintenance outage in April. There will be no increased emissions or environmental impact resulting from waiting until April to perform the maintenance.

An unplanned maintenance outage at the facility would force AES to incur substantial economic loss estimated to exceed \$1 million in costs, based on conservative estimates of the loss of business. It would also cause an unplanned loss of electricity supply to the power grid.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

AES first became aware that it would exceed the allowable pressure differential limit and likely violate permit condition D12.22 the week of January 15, 2024 based on routine differential pressure monitoring results. After discovering the imminent exceedance, AES investigated possible solutions that would not require an outage of the generation units to perform the necessary maintenance. AES determined that an outage was the only viable option and therefore, is submitting this interim and short variance petition to allow AES to conduct the necessary SCR maintenance during an already scheduled outage.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

AES first explored potential options for avoiding the violation and potential exceedance of the allowable pressure differential limit, including whether to perform an unanticipated maintenance outage to perform maintenance. AES soon confirmed that the issue cannot be reasonably corrected without undue burden as described above. AES immediately prepared this variance petition to assure that it will neither violate any permit condition nor fall out of compliance.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$ more than \$1 million

Number of employees laid off (if any): unknown

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

Without the variance, AES will be required to take the facility's power generation units out of service for at least three days to perform maintenance on the SCR catalyst beds. Suspension of commercial operation of the 650-MW combined cycle gas turbine generators (CCGTs) and outage at the facility would likely produce several adverse impacts, including, without limitation, a) substantial economic loss to AES exceeding over \$1 million during the outage and performance of necessary maintenance, and b) an unplanned loss of electricity supply to the power grid. These harms may be avoided by simply awaiting a prescheduled outage for maintenance in April, during which time the SCR catalyst beds will be maintained and brought back to compliance with the differential pressure limit. There are no increased or excess emissions caused by a delay in maintenance.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

AES cannot curtail or terminate operations without undue burden and public impact because curtailing or terminating operations would result in over \$1 million in economic losses and an unplanned loss of electricity supply to the power grid.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	©*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A			

\* Column A minus Column B = Column C

Excess Opacity: N/A %

20. Show calculations used to estimate quantities in No. 19, **or** explain why there will be no excess emissions.

An increase in the pressure differential across the SCR catalyst bed is simply an indication that maintenance/cleaning of the SCR catalyst bed may be appropriate, will not impair the emission reduction performance of the SCR units, and thus will not cause excess or increase emissions. Compliance with Permit Conditions A195.8 (hourly average NOx emission limit), A195.9 (hourly average CO emission limit), A195.10 (hourly average VOC emission limit), A195.15 (stack ammonia slip emission limit), C1.3 (startup and shutdown duration and emission limits), and D12.9 (hourly average ammonia injection rate limit) will ensure no excess emissions would be created due to the increased differential pressure across the SCR catalyst bed.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

AES does not anticipate any excess emissions during the variance period because the pressure gauge monitoring does not impact emissions or create any emissions. Any increased emissions would be detected by the continuous emissions monitoring system and appropriately mitigated.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

All monitoring and emission quantification procedures required by the Title V permit will be maintained during the variance period in accordance with good recordkeeping procedures and made readily available upon request.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

First, AES seeks short and interim variances in order to avoid any violation or any period of noncompliance.

Second, AES proposes performing necessary maintenance of the SCR system during a forthcoming maintenance outage that is already scheduled in April 2024.

24. State the date you are requesting the variance to begin: January 31, 2024; and the date by which you expect to achieve final compliance: May 1, 2024.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this Variance petition or any related Notice of Violation or Notice to Comply.

\_\_\_\_\_ Ext. \_\_\_\_\_  
\_\_\_\_\_ Ext. \_\_\_\_\_

If the petition was completed by someone other than the petitioner, please provide their name and title below.

\_\_\_\_\_  
Name Company Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 1.24.2024, at Long Beach, California

Jose A. Perez \_\_\_\_\_ JOSE A. PEREZ \_\_\_\_\_  
Signature Print Name

Title: Director



26. SMALL BUSINESS and TABLE III SCHEDULE A FEES: To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

**Declaration Re Reduced Fee Eligibility**

- 1. The petitioner is
  - a)  an individual, or
  - b)  an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

**If you selected 1a, above, skip item 2.**

- 2. The petitioner is
  - a)  a business that meets the following definition of Small Business as set forth in District Rule 102:  
SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:
    - (a) the number of employees is 10 or less; **AND**
    - (b) the total gross annual receipts are \$500,000 or less **or**
    - (iii) the facility is a not-for-profit training center.

**-OR-**

- b)  an entity with total gross annual receipts of \$500,000 or less.

- 3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

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

Executed on \_\_\_\_\_, at \_\_\_\_\_, California

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

Title \_\_\_\_\_

**ATTACHMENT A**

**ITEM 1**

Type of Variance Requested:

- (a) **SHORT:** If compliance with District rule(s) can be achieved in **90 days or less**, request a short variance. *(Hearing will be held approximately 21 days from date of filing--10-day posted notice required.)*
- (b) **REGULAR:** If compliance with District rule(s) will take **more than 90 days**, request a regular variance. If the variance request will extend beyond one year, you **must** include a specific detailed schedule of increments of progress [see Page 8, No. 24] under which you will achieve final compliance. *(Hearing will be held approximately 45 days from date of filing--30-day published notice required.)*
- (c) **EMERGENCY:** If non-compliance is the result of an unforeseen emergency, such as a sudden equipment breakdown, power failure, or accidental fire, you may request an emergency variance. You may request an *ex parte* emergency variance in addition to an emergency variance. **An emergency variance cannot be granted for more than 30 days.** *(Hearing will be held within 2 working days from the date of filing, whenever possible, excluding Mondays, weekends, and holidays.)* **If you request an emergency variance, you must answer No. 4 on page 1.**
- (d) **EX PARTE EMERGENCY:** If variance coverage is required on a weekend or when the Board is not in session, and you cannot wait until an emergency variance hearing can be held, you may request an *ex parte* emergency variance. An *ex parte* emergency variance will be granted or denied solely on the information contained in the petition and the District's response to the petition. Under most circumstances, an *ex parte* emergency variance will remain in effect only until a hearing can be held. **If you request an *ex parte* variance, you must answer No. 4 on page 1.**
- (e) **INTERIM:** If you require immediate relief (other than for emergencies) to cover the time until a short or regular variance hearing can be held, request an interim variance. If you request an interim variance, you must also request a short or a regular variance on the same petition. *(Hearing will be held approximately 2 working days from date of filing, whenever possible, excluding Mondays, weekends and holidays.)* **If you request an interim variance, you must answer No. 4 on page 1.**

**ITEM 4**

**GOOD CAUSE:** The Hearing Board is required to provide public notice of variance hearings, as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an Interim, *Ex Parte* Emergency or Emergency Variance hearing without the required public notice, a petitioner must present facts which will support a determination by the Board that "good cause" exists to hear a variance without notifying the public about the variance and providing the public with an opportunity to present evidence concerning the variance.

**ITEM 6**

**Example #1:**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Tenter frame		D32	
Chrome-plating tank	M99999		
Bake oven	123456		
Create special effects (fog)	N/A	N/A	N/A
Mfg., sale, distribution, use of non-compliant coating	N/A	N/A	12/10/95

**ITEM 9**

a) If you are requesting relief from Rule 401 and the excess opacity during the variance period will reach or exceed 40%, you should also request relief from California Health and Safety Code Section 41701.

b) If you are requesting relief from a permit condition(s), you should also request relief from the rule requiring compliance with conditions of the permit: 202(a), (b) or (c) - Temporary Permit to Operate; 203(b) - Permit to Operate; 2004(f)(1) – RECLAIM Permit; 3002(c) – Title V Permit.

**Example #2:**

<b>Rule</b>	<b>Explanation</b>
404(a)	tenter frame is vented to damaged air pollution control equipment
2004 (f)(1) [Condition No. 28-2 of Facility P/O No. 099999]	source test cannot be conducted as required until new ESP is installed
1113(c)(2)	petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter
401(a) & California H&S Code Section 41701	Opacity will exceed 45%.

**ITEM 24**

**Example #3:**

**Sample Schedule of Increments of Progress**

- Permit application(s) will be submitted to the District by [date].
- Contracts for the purchase of emission control systems will be awarded by [date].
- On-site construction will be completed by [date].

English	<b><i>“If you require a language interpreter in order to participate in the hearing, contact the Clerk of the Board at least five (5) calendar days before your hearing at 909-396-2500 or by e-mail at <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a>. Specify the case name and number, hearing date, and the language for which you are requesting an interpreter.”</i></b>
Farsi	"اگر برای شرکت در جلسه استماع به مترجم نیاز دارید، حد اقل پنج (5) روز تقویمی قبل از جلسه استماع، با منشی هیئت توسط شماره تلفن 909-396-2500 یا بوسیله نامه الکترونیکی با نشانی <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> تماس بگیرید. نام پرونده و شماره آن، تاریخ جلسه استماع و زبانی را که برای آن مترجم درخواست کرده اید، مشخص کنید"
Arabic	"إن كنت في حاجة لمترجم من أجل المشاركة في جلسة الاستماع، اتصل بكتاب المحكمة قبل موعد جلسة الاستماع بخمسة (5) أيام على هاتف 2500-396-909. حدد اسم ورقم القضية و تاريخ الاستماع واللغة التي تريد في <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> 396-909 أو بالبريد الإلكتروني على مترجم لها."
Armenian	"Ռեկվիրոյթյան մասնակցելու համար, եթե թարգմանչի կարիքն ունենաք, ցախարան ձեր ունկնդրոթյունը, ամենաքիչն ինձ (5) օրացույցային օրից առաջ կապվեք հաճձնախմբի բարոտղարի հետ, 909-396-2500 հեռախոսահամարով կամ էլէկտ' ցամակով հետևյալ հասցեով <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> : Նշեք գործի անունը և համարը, ունկնդրոթյան թվականը, և լեզուն, որի համար թարգմանչի էք ցանկանում"
Vietnamese	"Nếu quý vị cần Thông Dịch Viên cho buổi điều trần, xin vui lòng điện-thoại cho Thư Ký Hội Đồng tại số 909-396-2500 trễ nhất là năm [5] ngày, không tính hai ngày Thứ Bảy và Chủ Nhật, trước buổi điều trần hoặc gửi điện thư đến <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . Nhớ ghi rõ tên và số hồ sơ, ngày điều trần, và ngôn ngữ quý vị cần có người để thông dịch."
Chinese	如果你要求翻譯來協助你參加聽證會，請在你的聽證會前至少提前五天（5個日曆日）打電話到909-396-2500或發電子郵件到 <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> 與局裏的辦事人員聯絡。並且明確說明你的案子的名稱和號碼，聽證日期，以及你要求的翻譯的語種。
Japanese	公聴会（ヒアリング）に参加するために通訳が必要な場合、少なくとも5日前までに事務局（Clerk of the Board）にご連絡ください。電話でのご連絡は909-396-2500、e-メールでのご連絡は <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . までお願いします。その際、案件名（case name）と案件番号（case number）、ヒアリングの日付、通訳が必要な言語を特定して下さい。
Korean	"만약 귀하나 귀하의 증인들이 심리에 참여하기 위해 통역사가 필요하시면, 심리일 5일 전까지 기관부서의 서기에게 909-396-2500으로 연락하시거나, <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> 로 연락 하십시오. 통역이 필요하신 사건의 이름, 심리날짜, 그리고 언어를 정확하게 말씀해 주십시오."
Spanish	Si usted requiere un intérprete para poder participar en la audiencia, favor de comunicarse con el Secretario de la Junta cuando menos cinco (5) días hábiles antes de su audiencia al teléfono (909) 396-2500 ó por correo electrónico al <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . Especifique el nombre y el número de su causa, la fecha de la audiencia y el idioma del cual está solicitando el intérprete.
Tagalog	"Kung kailangan ninyong interpreter sa Pilipino para makasali kayo sa pagdinig sa kaso, tumawag lang po kayo sa Clerk of the Board sa numero 909-396-2500 or kung hindi mag-email kayo sa email <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . Kailangan na tumawag kayo sa loob nang limang araw (5 days) bago ang inyong hearing date at ibigay and inyong pangalan at case number, araw nang inyong pagdinig sa kaso at inyong gusto na may lenguahe na interpreter".
Thai	หากคุณต้องการล่ามในการขึ้นศาล ให้ติดต่อเจ้าหน้าที่ ล่วงหน้าอย่างน้อย 5 วันก่อนวันขึ้นศาล โดยติดต่อที่เบอร์โทร 909-396-2500 หรือโดย e-mail ที่ <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> ให้ออกชื่อและหมายเลขของคุณ พร้อมทั้งวันเวลาในการขึ้นศาล และระบุภาษาที่คุณต้องการล่าม

**ATTACHMENT A**  
(Permit Condition)



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**FACILITY PERMIT TO OPERATE  
AES ALAMITOS, LLC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

**The operator shall comply with the terms and conditions set forth below:**

[**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; RULE 2005, 12-4-2015**]

[Devices subject to this condition : C170, C178]

D12.11 The operator shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the SCR catalyst bed in inches water column.

The operator 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 month and shall be calculated based upon the average of the continuous monitoring for that month.

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

The pressure differential shall not exceed 1.6 inches water column.

[**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; RULE 2005, 12-4-2015**]

[Devices subject to this condition : C170, C178]

**ATTACHMENT B**  
(Applicable Equipment)

I. C170 (SCR Equipment Description)



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**FACILITY PERMIT TO OPERATE  
AES ALAMITOS, LLC**

**SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS**

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 12: INTERNAL COMBUSTION - POWER GENERATION</b>					
GENERATOR, NO. CCGT-1, 236.645 MW GROSS AT 28 F  HEAT EXCHANGER, HEAT RECOVERY STEAM GENERATOR (HRSG), NO. CCGT-1  GENERATOR, STEAM TURBINE GENERATOR (STG), 219.615 MW GROSS AT 28 F, COMMON WITH HRSG NO. CCGT-2				[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2) -Offset, 12-6-2002]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO. CCGT-1, SYNERGY CATALYST, 342.5 CU. FT.; WIDTH: 25 FT 9 IN; HEIGHT: 76 FT; LENGTH: 2.1 IN A/N: 608431	C169	D165 C170			
SELECTIVE CATALYTIC REDUCTION, NO. CCGT-1, CORMETECH, TITANIUM/ VANADIUM/TUNGSTEN, 1289 CU.FT.; WIDTH: 25 FT 8.5 IN; HEIGHT: 71 FT 7.2 IN; LENGTH: 1 FT 6 IN WITH A/N: 608431  AMMONIA INJECTION, AQUEOUS AMMONIA	C170	C169 S172		NH3: 5 PPMV (4) [RULE 1303(a) (1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.15, D12.9, D12.10, D12.11, D29.4, E193.4

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit  
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit  
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements  
 \*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

II. C178 (SCR Equipment Description)



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**FACILITY PERMIT TO OPERATE  
AES ALAMITOS, LLC**

**SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS**

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 12: INTERNAL COMBUSTION - POWER GENERATION</b>					
GENERATOR, NO. CCGT-2, 236.645 MW GROSS AT 28 F  HEAT EXCHANGER, HEAT RECOVERY STEAM GENERATOR (HRSG), NO. CCGT-2  GENERATOR, STEAM TURBINE GENERATOR (STG), 219.615 MW GROSS AT 28 F, COMMON WITH HRSG NO. CCGT-1				[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2) -Offset, 12-6-2002]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]	
CO OXIDATION CATALYST, NO. CCGT-2, SYNERGY CATALYST, 342.5 CU. FT.; WIDTH: 25 FT 9 IN; HEIGHT: 76 FT; LENGTH: 2.1 IN A/N: 608432	C177	D173 C178			
SELECTIVE CATALYTIC REDUCTION, NO. CCGT-2, CORMETECH, TITANIUM/ VANADIUM/TUNGSTEN, 1289 CU.FT.; WIDTH: 25 FT 8.5 IN; HEIGHT: 71 FT 7.2 IN; LENGTH: 1 FT 6 IN WITH A/N: 608432  AMMONIA INJECTION, AQUEOUS AMMONIA	C178	C177 S180		NH3: 5 PPMV (4) [RULE 1303(a) (1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.15, D12.9, D12.10, D12.11, D29.4, E193.4

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit  
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit  
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements  
 \*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.