

ORIGINAL

RV 5/21/24

SOUTH COAST AQMD
CLERK OF THE BOARDS

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

2024 APR 12 PM 2:11

PETITIONER: Walnut Creek Energy, LLC

CASE NO: 6230-2
FACILITY ID: 146536

FACILITY ADDRESS: 911 Bixby Dr
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: City of Industry, CA, 91745

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).

Greg Wolffe

George Piantka

Principal Scientist, Yorke Engineering, LLC

Senior Director, NRG

31726 Rancho Viejo Rd, Suite 218

4600 Carlsbad Blvd

San Juan Capistrano, CA Zip 92675

Carlsbad, CA Zip 92008

☎ (909) 861-2729 Ext.

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Fax ()

Fax ()

E-mail GWolffe@YorkeEngr.com

E-mail George.Piantka@nrg.com

3. RECLAIM Permit Yes No

Title V Permit Yes No

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)

N/A

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

Walnut Creek Energy (WCE) is a 500-megawatt natural gas-fired, simple cycle electrical generating facility, designed to meet electric generation load during periods of high demand. WCE operates five (5) GE LMS100 simple-cycle gas turbines, each with an electrical generator and emissions control equipment. As a simple-cycle configuration, there are no heat recovery steam generators, duct burners, or steam turbines.

WCE recently undertook a facility upgrade project that included the installation of state-of-the-art selective catalytic reduction (SCR) catalyst that will achieve the lowest achievable emission rate (LAER) of oxides of nitrogen (NOx) emission of any single cycle electrical power generating facility in the South Coast Air Basin. Permitting for the upgrade was completed on January 31, 2024.

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)
GE LMS100 simple cycle gas turbine (Unit 1)	Application No: 647716	D1	N/A
GE LMS100 simple cycle gas turbine (Unit 2)	Application No: 647717	D7	N/A
GE LMS100 simple cycle gas turbine (Unit 3)	Application No: 647718	D13	N/A
GE LMS100 simple cycle gas turbine (Unit 4)	Application No: 647719	D19	N/A
GE LMS100 simple cycle gas turbine (Unit 5)	Application No: 647720	D25	N/A

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 Units 1-5 gas turbines are dispatched according to local demand, system load, and system reliability requirements dictated by the California Independent System Operator (Cal ISO).

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

If yes, how often: At least annually during scheduled outages. Date of last maintenance and/or inspection: D1, D7, D13, D19, and D25 underwent annual outages between January and March 2024.

Describe the maintenance and/or inspection that was performed.

Regular maintenance and inspections are performed on the entire power generating system for all five (5) units at least annually during regularly scheduled outages that are coordinated with CAISO. Annual inspections are comprehensive and evaluate the mechanical integrity of the gas turbines and ancillary equipment necessary to operate the units in compliance. Walnut Creek permitted the replacement of SCR catalysts for D1, D7, D13, D19, and D25. SCAQMD issued the Permit to Construct on January 31, 2024 for the catalyst replacements and for modifications to the heat input, which resulted in the change to the NOx emissions concentration (lowered to 2.3 ppm NOx corrected to 15%) to meet BACT and the undertaking of a reduced start-up duration and NOx and CO start-up and shutdown emissions limits for the first since D1, D7, D13, D19 and D25 became commercially available in 2013. Separate outages were scheduled between February 17 and April 28 for the catalyst replacements.

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
Section H, Permit Condition # A195.7 and of Facility Permit 146536 (Rev. 9), applicable to Devices D1, D7, D13, D19, D25 [SCAQMD Rule 2005, Rule 2004(f)(1), and Rule 202(b)]	Condition A195.7 requires that NOx emissions shall not exceed 7.0 lbs during start-up and 4.3 lbs during shutdown. This NOx start-up mass limit in condition A195.7 cannot be met for Units 1-5 (Devices D1, D7, D13, D19, D25). Walnut Creek Energy is seeking variance relief from this condition.
Section H, Permit Condition # A195.8 and of Facility Permit 146536 (Rev. 9), applicable to Devices D1, D7, D13, D19, D25 [SCAQMD Rule 1703]	Condition A195.8 requires that CO emissions shall not exceed 15.4 lbs during start-up and 18.2 lbs during shutdown. Compliance with this condition for Units 1-5 (Devices D1, D7, D13, D19, D25) is under review during the recommissioning of the units as part of the SCR upgrade and therefore compliance certainty cannot be ascertained until recommissioning for each unit is complete and operational data during the summer months are evaluated. Walnut Creek Energy is seeking variance relief from this condition.
SCAQMD Rule 3002(c)	Rule 3002 requires Title V permit holders to comply with all terms, requirements, and conditions specified in the Title V permit at all times.

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

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
6230-1	Dec. 30, 2022	Dec. 1, 2023	Unit 2 (D7) triennial source testing originally scheduled for November was delayed until fourth quarter of 2023 per Condition 5 of Variance 6230-1, which was granted on December 30, 2022, due to complete failure of Unit 2's supercore and power turbine. Source testing was conducted on December 1, 2023, which demonstrated compliance with Particulate Matter (PM10), Volatile Organic Compounds (VOC), and Oxides of Sulfur (SOx) standards. The test results were submitted within 45-days of source testing per Condition 8 of Variance 6230-1, which closed Case 6230-1.

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.

On January 31, 2024, Walnut Creek Energy was issued a Permit to Construct and Temporary Permit to Operate (PTC/TPTO) for the increase of the heat input from 891.7 MMBtu/hr to 951 MMBtu/hr to correspondingly increase generation for the grid to help address regional generation needs/improve grid reliability. The PTC/TPTO resulted in new Permit Conditions A195.7 and A195.8 that apply to Units 1-5 (Devices D1, D7, D13, D19, D25) that include, for the first time, new NOx and CO mass emission limits for start-up and shutdown operations that take effect 90 days after the completion of recommissioning for each unit following replacement of the selective catalytic reduction (SCR) catalyst. The heat input increased triggered NOx BACT resulting in a reduction of the NOx emissions limit to 2.3 ppm (corrected to 15% O2) and a reduced start-up duration. Mass emission start-up and shutdown limits for NOx and CO, as stated in A195.7 and A195.8 respectively, do not represent a rule compliance requirement or Best Available Control Technology (BACT) standard. These limits were added to the Title V permit in the January 31, 2024 PTC/TPTO to enforce NOx and CO emission estimates for start-up and shutdown operations assumed by the SCAQMD engineering staff during initial facility permitting and used for emission calculation purposes.

Following the start-up of Unit 2, the facility determined that the NOx start-up mass emission limit identified in A195.7 could not be achieved and the corresponding CO start-up mass limit in A195.8 and the NOx and CO shutdown mass emission limits identified in A195.7 and A195.8 may demonstrate that it cannot be achieved by the end of the recommissioning and subsequent 90 day period after recommissioning. The expected dates for when each unit will be subject to the limits that cannot be achieved are as follows (all dates are 2024):

Unit (Device ID)	SCR Catalyst Install Date	First Fire Date	End Date of Recommissioning	Effective Date of Non-Compliance
U1 (D1)	4/7	4/9	6/6 (est)	9/4 (est)
U2 (D7)	2/18	2/27	4/15	7/15
U3 (D13)	2/25	2/28	4/22	7/22
U4 (D19)	4/14	4/18	6/13 (est)	9/11 (est)
U5 (D25)	4/28	5/6	6/27 (est)	9/25 (est)

As shown in the table above, Unit 2 will become subject to the new start-up and shutdown mass emission limits for NOx and CO on July 15, 2024, followed by Unit 3 on July 22, 2024, and then Units 1, 4, and 5 by September 5-25, 2024, respectively. Based on the existing limited recommissioning data available, Walnut Creek does not believe it will be in violation of CO start-up or NOx and CO shutdown permit limits. However, because Walnut Creek is still reviewing available recommissioning data, out of an abundance of caution we are including a request for relief from these pollutants and operating mode as part of the petition.

Walnut Creek Energy plans to submit a permit application to modify NOx and CO start-up and shutdown limits shown in the Permit Conditions A195.7 and A195.8 prior to being heard for the Regular Variance. The ability for the SCAQMD to process the applications is beyond the control of Walnut Creek Energy; therefore, Walnut Creek Energy is seeking relief from these permit conditions until these limits are changed in the facility Title V permit. If recommissioning data indicates that compliance with the existing CO start-up or NOx and CO shutdown permit limits can be achieved, they will not be included in the permit application or requested under this regular variance.

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).

Walnut Creek Energy became aware that compliance with new mass emission limits will present a challenge in early March 2024 when recommissioning Unit 2. Walnut Creek Energy has witnessed the same challenges with meeting the new mass emissions limit during the operations of Unit 1 and 3, both of which now have the replacement catalysts installed under the PTC. Units 4 and 5 catalyst installations will be completed by the end of April 2024.

Walnut Creek met with the SCAQMD permit engineer in mid-March to discuss various approaches to revising the permit limits, which the SCAQMD permitting engineer agreed needed to be revised based on continuous emission monitoring system (CEMS) data and a comparison to the NOx and CO start-up and shutdown mass limits permitted for other similar units at other facilities within the SCAQMD jurisdiction.

Walnut Creek Energy has now concluded that they will request changes of the limits in Permit Conditions # A195.7 and # A195.8 under a new set of applications to the SCAQMD. Walnut Creek Energy is seeking variance relief from these conditions until the new limits in the permit conditions are approved; hence the Regular Variance timeline (up to 1 year) is necessary.

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

Walnut Creek Energy plans to submit a permit condition amendment to increase the limits in Permit Conditions # A195.7 and # A195.8 to the emission limit being heard for the Regular Variance.

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: None of the units can meet the start-up mass limits, meaning they cannot be operated, which would cause a complete loss of all capacity payments and revenue from providing energy and ancillary services to the CAISO grid, amounting to millions of \$ over the proposed term of the variance.

Number of employees laid off (if any) _____

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

Units 1-5 are contracted to provide Resource Adequacy capacity, which requires that the petitioner certify availability monthly and submit bids every hour of every day in the CAISO markets. If the variance is not granted, all five units would need to be shut down until the permit could be amended, which would take several months, meaning that the resources would be unavailable during the critical summer to early fall season when they are most valuable and most critical to electric reliability.

Potential impacts to California's grid and the public could result if Units 1-5 cannot be operated under a variance, which could result in the dispatch of less efficient and higher emitting generation to satisfy electricity demand.

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

Without a variance, Units 1-5 cannot be started, eliminating the ability to provide energy, Spinning and Non-Spinning Reserve and Regulation, services essential to reliable operation of the CAISO Grid, and resulting in loss of all revenue.

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)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
NOx	0.0	0.0	0.0
CO	0.0	0.0	0.0

* Column A minus Column B = Column C

Excess Opacity: 0 %

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

Walnut Creek Energy is subject to a permitted natural gas fuel usage limit of no more than 20.7 MM cubic feet per day per turbine. Walnut Creek will comply with this limit throughout the variance period, and not exceed any existing permitted mass emission limits, other than the NOx start-up limit and CO limits for which relief is requested. The daily natural gas usage limit developed during recent permitting actions to enforce potential to emit emissions under new source review based on operating 24 hours per day at maximum turbine load (i.e., 100% fuel heat input rate). By committing to operate below the daily natural gas fuel limit, Walnut Creek will ensure that actual emissions will remain less than permitted levels for all pollutants, including NOx and CO.

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.

Excess emission will be mitigated through compliance with existing natural gas throughput usage limits, and compliance with all other Title V mass emission limits.

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.**

Units 1-5 CEMS will operate to monitor emissions during the variance period.

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.

Walnut Creek Energy plans to submit a permit application to modify NOx and CO start-up mass and shutdown limits shown in the Permit Conditions A195.7 and A195.8 prior to being heard for the Regular Variance. Walnut Creek Energy is seeking variance relief from these conditions until the new limits in the permit conditions are approved; hence the Regular Variance timeline (up to 1 year) is necessary.

24. State the date you are requesting the variance to begin: July 15, 2024; and the date by which you expect to achieve final compliance: November 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.

Chris Perri (Permit engineer) _____ Ext. 2696 _____

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

<u>Greg Wolffe</u>	<u>Yorke Engineering, LLC</u>	<u>Principal Scientist</u>
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 April 12, 2024, at Diamond Bar, California



Signature

Greg S Wolffe
Print Name

Title: Principal Scientist _____

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO.1, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647716 Permit to Construct Issued: 01/31/24	D1	C4	NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.3 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 6-3-2011; RULE 2005, 11-5-2021]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.1, I298.7, K67.5

* (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.

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Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.1, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647166 Permit to Construct Issued: 01/31/24	C3				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 1, CORMETECH CMHCDET, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647166 Permit to Construct Issued: 01/31/24	C4	D1		NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID					
STACK, NO.1, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647716 Permit to Construct Issued: 01/31/24	S6				

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 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

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Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.2, BASF CAMEL, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647167 Permit to Construct Issued: 01/31/24	C9				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 2, CORMETECH CMHCDT, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647167 Permit to Construct Issued: 01/31/24	C10			NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID					
STACK, NO.2, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647717 Permit to Construct Issued: 01/31/24	S12				

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO.3, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647718 Permit to Construct Issued: 01/31/24	D13		NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; NOX: 2.3 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.3, I298.9, K67.5

* (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.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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
Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.3, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647168 Permit to Construct Issued: 01/31/24	C15				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 3, CORMETECH CMHCDT, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647168 Permit to Construct Issued: 01/31/24	C16			NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID STACK, NO.3, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647718 Permit to Construct Issued: 01/31/24	S18				

* (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.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO.4, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647719 Permit to Construct Issued: 01/31/24	D19		NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 2.3 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988 ; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006] ; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976 ; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976 ; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997]; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006]; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005]; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996 ; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.4, I298.10, K67.5

* (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.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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
Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.4, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647169 Permit to Construct Issued: 01/31/24	C21				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 4, CORMETECH CMHCDET, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647169 Permit to Construct Issued: 01/31/24	C22			NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT. 12-6-2002]	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID STACK, NO.4, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647719 Permit to Construct Issued: 01/31/24	S24				

* (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.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, UNIT NO.5, NATURAL GAS, GENERAL ELECTRIC, MODEL LMS100PA, SIMPLE CYCLE, INTERCOOLED, 951.0 MMBTU/HR AT 30 DEGREES F, WITH WATER INJECTION WITH A/N: 647720 Permit to Construct Issued: 01/31/24	D25		NOX: MAJOR SOURCE**; SOX: PROCESS UNIT**	CO: 4 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988]; CO: 2000 PPMV NATURAL GAS (5) [RULE 409, 8-7-1981]; NOX: 2.3 PPMV NATURAL GAS (4) [RULE 1703(a)(2) - PSD-BACT, 10-7-1988 ; RULE 2005, 12-4-2015]; NOX: 15 PPMV NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006] ; PM10: 0.01 GRAINS/SCF NATURAL GAS (5) [RULE 475, 10-8-1976 ; RULE 475, 8-7-1978]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5B) [RULE 409, 8-7-1981]; PM10: 11 LBS/HR NATURAL GAS (5A) [RULE 475, 10-8-1976 ; RULE 475, 8-7-1978]; SO2: (9) [40CFR 72 - Acid Rain Provisions, 11-24-1997] ; SOX: 0.06 LBS/MMBTU NATURAL GAS (8) [40CFR 60 Subpart KKKK, 7-6-2006] ; SOX: 0.67 LBS/MMSCF (1) [RULE 2011, 5-6-2005] ; VOC: 2 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996 ; RULE 1303(a)(1)-BACT, 12-6-2002]	A63.1, A195.6, A195.7, A195.8, A195.9, A327.1, B61.1, C1.1, C1.5, D12.1, D29.2, D29.3, D29.4, D82.1, D82.2, E57.1, E193.1, E448.3, H23.1, I298.5, I298.11, K67.5

* (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.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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
Process 1: INTERNAL COMBUSTION					
GENERATOR, 100.1 NET MW (110 GROSS MW)					
CO OXIDATION CATALYST, NO.5, BASF CAMET, WITH 420 CUBIC FEET OF TOTAL CATALYST VOLUME A/N: 647170 Permit to Construct Issued: 01/31/24	C27				D12.8
SELECTIVE CATALYTIC REDUCTION, NO. 5, CORMETECH CMHCDT, WITH 1736 CUBIC FEET OF TOTAL CATALYST VOLUME, WIDTH: 8 FT 6 IN; HEIGHT: 30 FT 9.5 IN; LENGTH: 3 FT 3.8 IN WITH A/N: 647170 Permit to Construct Issued: 01/31/24	C28			NH3: 5 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	A195.4, D12.3, D12.4, D12.7, E193.1, E193.2
AMMONIA INJECTION, GRID STACK, NO.5, HEIGHT: 90 FT ; DIAMETER: 13 FT 6 IN A/N: 647720 Permit to Construct Issued: 01/31/24	S30				

* (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.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

[Devices subject to this condition : D1, D7, D13, D19, D25]

A195.7 The 2.3 PPMV NOX emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The limit shall not apply during start up, shutdown periods, and the recommissioning.

Start up time shall not exceed 35 minutes. Shutdown time shall not exceed 10 minutes. The turbine is limited to a maximum of 2 start ups per day and 40 start ups per month. Written records of starts ups and shutdowns shall be maintained and made available upon request from the Executive Officer..

NOx emissions during start up shall not exceed 7.0 lbs, and NOx emissions during a shutdown shall not exceed 4.3 lbs. These limits shall take effect 90 days after the completion of recommissioning for each unit.

For the purposes of this condition, the beginning of start-up occurs at initial fire in the combustor and the end of start-up occurs when both the NOx and CO BACT levels are achieved. If during start-up the process is aborted and the turbine is restarted, then the start-up and restart will count as one start-up, provided the total time for the start-up does not exceed 35 minutes..

Recommissioning is a one time event that shall not exceed 13 operating hours per turbine. Once started, the recommissioning shall be completed within 14 operating days per turbine, and all turbines shall be recommissioned within 60 days of the installation of the replacement SCR. The operator shall notify South Coast AQMD prior to the start of the recommissioning operation and at the conclusion of the recommissioning operation for each unit..

Operation of the equipment prior to completion of the recommissioning shall be in accordance with Section D of the permit, including limiting the maximum heat input rate for each turbine to 891.7 mmbtu/hr..

The NOx emissions during recommissioning shall not exceed 10.2 lbs/hr and 132.6 total lbs as determined through the use of the certified CEMS. The operator shall keep records of the date and time the turbine is operated during recommissioning, the duration of the operation, the fuel use and the NOx and CO emissions..

The operator shall keep records of the date, time and duration as well as minute by

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

minute data (NO_x, CO and O₂ concentration and fuel flow rate at a minimum) of each startup and shutdown, and during the recommissioning operation..

[**RULE 2005, 12-4-2015**; RULE 2005, 11-5-2021]

[Devices subject to this condition : D1, D7, D13, D19, D25]

A195.8 The 4.0 PPMV CO emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry.

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The limit shall not apply during start up, shutdown periods, and the recommissioning..

Start up time shall not exceed 35 minutes. Shutdown time shall not exceed 10 minutes. The turbine is limited to a maximum of 2 start ups per day and 40 start ups per month. Written records of starts ups and shutdowns shall be maintained and made available upon request from the Executive Officer..

CO emissions during a start up shall not exceed 15.4 lbs, and CO emissions during a shutdown shall not exceed 18.2 lbs. These limits shall take effect 90 days after the completion of recommissioning for each unit..

For the purposes of this condition, the beginning of start-up occurs at initial fire in the combustor and the end of start-up occurs when both the NOx and CO BACT levels are achieved. If during start-up the process is aborted and the turbine is restarted, then the start-up and restart will count as one start-up, provided the total time for the start-up does not exceed 35 minutes..

Recommissioning is a one time event that shall not exceed 13 operating hours per turbine. Once started, the recommissioning shall be completed within 14 operating days per turbine, and all turbines shall be recommissioned within 60 days of the installation of the replacement SCR. The operator shall notify South Coast AQMD prior to the start of the recommissioning operation and at the conclusion of the recommissioning operation for each unit..

Operation of the equipment prior to completion of the recommissioning, shall be in accordance with Section D of the permit including limiting the maximum heat input rate for each turbine to 891.7 mmbtu/hr..

The CO emissions during recommissioning shall not exceed 8.0 lbs/hr and 104 total lbs as determined through the use of the certified CEMS. The operator shall keep records of the date and time the turbine is operated during recommissioning, the duration of the operation, the fuel use and the NOx and CO emissions..

The operator shall keep records of the date, time and duration as well as minute by minute data (NOx, CO and O2 concentration and fuel flow rate at a minimum) of

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

each startup and shutdown, and during the recommissioning operation..

[RULE 1703 - PSD Analysis, 10-7-1988]

[Devices subject to this condition : D1, D7, D13, D19, D25]

A195.9 The 2.0 PPMV VOC emission limit(s) is averaged over 60 minutes at 15 percent O₂, dry..

The limit shall not apply during start up and shutdown periods..

Start up time shall not exceed 35 minutes. Shutdown time shall not exceed 10 minutes. The turbine shall be limited to a maximum of 2 start ups per day and 40 start ups per month. Written records of starts ups and shutdowns shall be maintained and made available upon request from the Executive Officer..

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D1, D7, D13, D19, D25]

A327.1 For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[RULE 475, 10-8-1976; RULE 475, 8-7-1978]

[Devices subject to this condition : D1, D7, D13, D19, D25]

B. Material/Fuel Type Limits

B61.1 The operator shall only use natural gas containing the following specified compounds:

Compound	Limit	grain per 100 scf

FACILITY PERMIT TO OPERATE WALNUT CREEK ENERGY, LLC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

total sulfur | less than or equal to | 0.25
compounds
calculated as
H₂S

[**RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D1, D7, D13, D19, D25]

C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the fuel usage to no more than 367 MM cubic feet in any one calendar month.

For the purpose of this condition, fuel usage shall be defined as the total natural gas usage of a single turbine.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[**RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D1, D7, D13, D19, D25]

C1.5 The operator shall limit the fuel usage to no more than 20.7 MM cubic feet per day.

For the purpose of this condition, fuel usage shall be defined as the total natural gas usage of a single turbine. Alternatively, the operator shall limit the heat input to each turbine to 21,735 mmbtu per day calculated by using the fuel use data multiplied by a fuel heat content of 1050 btu/cf..

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[**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**]