

Title V Semi-Annual Monitoring Verification Report

Applicable Limits and Compliance Monitoring

This report summarizes the applicable source – specific emission limits for the Cogeneration Plant, facility #A0621. The following table shows the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. Also, for periodic monitoring, the frequency of the monitoring is shown: annual (A), quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) is required if the current applicable rule or regulation does not require monitoring – where our facility’s operation will not deviate from the applicable emission limit based upon the nature of its operation. The last two columns indicate our facility’s compliance from **September 1, 2013** through **February 28, 2014**.

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
PM	BAAQMD Regulation 6-1-301	N		Ringelmann 1.0		N		Yes (1)
PM	SIP Regulation 6-301	Y		Ringelmann 1.0		N		Yes (1)
FP	BAAQMD Regulation 6-1-310.3	N		0.15 gr/dscf @ 6% O ₂		N		Yes (1)
FP	SIP Regulation 6-1-310.3	N		0.15 gr/dscf @ 6% O ₂		N		Yes (1)
NOx	BAAQMD 9-9-301.1.1	N		42 ppmv @15% O ₂ (dry)	Condition #14194, Part 9 and 10, BAAQMD 9-9-504	P/A	Source test	Yes (1)

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
NOx	BAAQMD 9-9-301.1.1	N		42 ppmv @ 15% O ₂ (dry)	Condition #14194, part 8	C	Water-to-fuel monitoring	No
NOx	BAAQMD 9-9-301.2	N		42 ppmv @ 15% O ₂ (dry)	Condition #14194, parts 9 and 10, BAAQMD 9-9-504	P/A	Source test	Yes
NOx	BAAQMD 9-9-301.2	N		42 ppmv @ 15% O ₂ (dry)	Condition #14194, part 8	C	Water-to-fuel monitoring	Yes
NOx	BAAQMD 9-9-301.2	N	Up to 60 months after availability of commercially available technology	35 ppmv @ 15% O ₂ (dry)	Condition #14194, Parts 9 and 10, BAAQMD 9-9-504	P/A	Source test	N/A
NOx	BAAQMD 9-9-301.2	N	Up to 60 months after availability of commercially available technology	35 ppmv @ 15% O ₂ (dry)	Condition #14194, Part 8	C	Water-to-fuel monitoring	N/A

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
NOx	SIP 9-9-301.1.1	Y		42 ppmv @ 15% O ₂ (dry)	Condition #14194, parts 9 and 10	P/A	Source test	Yes
NOx	SIP 9-9-301.1.1	Y		42 ppmv @ 15% O ₂ (dry)	Condition #14194, part 8	C	Water-to-fuel monitoring	No
	NSPS Subpart GG 60.332 (a)(2)	Y		150 ppmv @ 15% O ₂ (dry)	NSPS Subpart GG 60.334(a)	C	Water-to-fuel monitoring	Yes (1)
NOx	Condition #14194, Part 4	Y		42 ppmv @ 15% O ₂ (dry), each turbine (except during startup and shutdown)	Condition #14194, parts 9 and 10	P/A	Source test	Yes
NOx	Condition #14194, Part 4	Y		42 ppmv @ 15% O ₂ (dry), each turbine (except during startup and shutdown)	Condition #14194, part 8	C	Water-to-fuel monitoring	No
NOx	Condition #14194, Part 5	Y		42 ppmv @ 15% O ₂ (dry), each turbine /supplemental burner combination	Condition #14194, parts 9 and 10	P/A	Source test	Yes

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 Applicable Limits and Compliance Monitoring Requirements (continued)
 S1, S2-Gas Turbines w/Water Injection
 S3, S4-Duct Burners**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
SO2	BAAQMD 9-1-301	Y		Ground level concentrations: 0.5 ppm for 3 Consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours		N		Yes (1)
	BAAQMD 9-1-302	Y		300 ppm (dry) general emission limitation		N		Yes (1)
	40 CFR 60 Subpart GG 60.333 (b)	Y		0.8% (wt) fuel sulfur content	40 CFR 60 Subpart GG 60.334 (h)(3)	N	None	Yes (1)
Fuel Usage	BAAQMD Condition #14194 part 2	Y		55.1 MMBTU/hr heat input (each turbine)	BAAQMD Condition #14194 part 7	C	Continuous Fuel Usage Monitors	Yes
	BAAQMD Condition #14194 part 3	Y		13.5 MMBTU/hr Heat input (each duct burner)	BAAQMD Condition #14194 part 7	C	Continuous Fuel Usage Monitors	Yes
Water-to-Fuel Ratio	BAAQMD Condition #14194 part 6	Y		Water-to-Fuel Ratio: 57% to 62% (wt)	BAAQMD Condition #14194 part 7	C	Continuous Water-to-Fuel Monitoring	No

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
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Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12 month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	No

(1) This facility uses PUC pipeline quality natural gas. Enforceable limits are “subsumed” by use of this fuel. (Reference: Section IX “Permit Shield” of this plant’s Major Facility Review Permit.