

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

**Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, & S-4 COMBUSTION GAS TURBINES WITH WATER INJECTION,
S-7, S-8, S-9, & S-10 HEAT RECOVERY STEAM GENERATORS**

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|---------------------------|---|--------|---------------------------|--|--|------------------------------|-----------------|------------|----|
| | | | | | | | | Yes | No |
| NOx | BAAQMD 9-9-301.2 | N | After Phase II Conversion | 9 ppmv @ 15% O ₂ , dry or 0.43 lbs/MW-hr | BAAQMD 9-9-501 and BAAQMD condition #19610, part 25c | C | CEM | X | |
| NOx | SIP 9-9-301.3 | Y | After Phase II Conversion | 9 ppmv @ 15% O ₂ , dry | BAAQMD 9-9-501 and BAAQMD condition #19610, part 25c | C | CEM | X | |
| NOx | NSPS Subpart KKKK 40 CFR 60.4320(a) and (h) | Y | After Phase II Conversion | 25 ppmv @ 15% O ₂ , dry 30 day rolling average | NSPS 40 CFR 60.4335(b)(1) | C | CEM | X | |
| NOx | None | Y | After Phase II Conversion | None | 40 CFR 75.10 | C | CEM | X | |
| NOx (as NO ₂) | BAAQMD condition #23688, part 10 | Y | After Phase II Conversion | 1464 lb/day and 102 lb/hr for all turbines and HRSGs combined during commissioning, including startup and shutdown of turbine without catalyst | BAAQMD condition #23688, parts 7 and 25c | C | CEM | X | |
| NOx (as NO ₂) | BAAQMD condition #23688, part 10 | Y | After Phase II Conversion | 1464 lb/day and 61 lb/hr for all turbines and HRSGs combined during commissioning, including startup and shutdown of turbine with catalyst | BAAQMD condition #23688, parts 7 and 25c | C | CEM | X | |

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June 1, 2012 – November 30, 2012**

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S-7, S-8, S-9, & S-10 HEAT RECOVERY STEAM GENERATORS**

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|---------------------------|-----------------------------------|--------|---------------------------|---|--|------------------------------|-----------------|------------|----|
| | | | | | | | | Yes | No |
| NOx | BAAQMD condition #23688, part 19a | Y | After Phase II Conversion | 2 ppmv @ 15% O ₂ , dry, 1-hr average except during turbine startup or shutdown | BAAQMD condition #23688, parts 19a and 25c | C | CEM | X | |
| NOx | BAAQMD condition #23688, part 19a | Y | After Phase II Conversion | 2 ppmv @ 15% O ₂ , dry, 1-hr average except during turbine startup or shutdown | BAAQMD condition #23688, part 26a | P/A | Source test | X | |
| NOx (as NO ₂) | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 175.6 lb/day for each turbine/HRSG power train including startup and shutdown | BAAQMD condition #23688, part 25c | C | CEM | X | |
| NOx (as NO ₂) | BAAQMD condition #23688 part 22 | Y | After Phase II Conversion | 702.4 lb/day (as NO ₂) for all turbines and HRSGs, combined, including startup and shutdown | BAAQMD condition #23688, part 25c | C | CEM | X | |
| NOx (as NO ₂) | BAAQMD condition #23688 part 22 | Y | After Phase II Conversion | 94.1 tons per year (as NO ₂) for all turbines and HRSGs combined, except during startup or shutdown | BAAQMD condition #23688, part 25c | C | CEM | X | |
| CO | BAAQMD condition #23688, part 10 | Y | After Phase II Conversion | 1056 lb/day and 88 lb/hr for all turbines and HRSGs combined during commissioning, including startup and shutdown of turbine without catalyst | BAAQMD condition #23688, parts 7 and 25c | C | CEM | X | |
| CO | BAAQMD condition #23688, part 10 | Y | After Phase II Conversion | 984 lb/day and 41 lb/hr for all turbines and HRSGs combined during commissioning, including startup and shutdown of turbine with catalyst | BAAQMD condition #23688, parts 7 and 25c | C | CEM | X | |

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Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

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| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|-----------------|-----------------------------------|--------|---------------------------|---|--|------------------------------|--|------------|----|
| | | | | | | | | Yes | No |
| CO | BAAQMD condition #23688, part 19c | Y | After Phase II Conversion | 2 ppmv @ 15% O ₂ , dry, 1-hr average except during turbine startup or shutdown | BAAQMD condition #23688, parts 19c and 25c | C | CEM | X | |
| CO | BAAQMD condition #23688, part 19c | Y | After Phase II Conversion | 2 ppmv @ 15% O ₂ , dry, 1-hr average except during turbine startup or shutdown | BAAQMD condition #23688, part 26c | P/A | Source test | X | |
| CO | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 97 lb/day for each turbine/HRSG power train including startup and shutdown | BAAQMD condition #23688, part 25c | C | CEM | X | |
| CO | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 388 lb/day for all turbines and HRSGs combined, including startup and shutdown | BAAQMD condition #23688, part 25c | C | CEM | X | |
| CO | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 53.4 tons per year for all turbines and HRSGs combined, including startup and shutdown | BAAQMD condition #23688, part 25c | C | CEM | X | |
| CO ₂ | | Y | After Phase II Conversion | None | 40 CFR 75.10 | C | CEM (CO ₂) or CEM (O ₂) or fuel flow monitor | X | |
| SO ₂ | BAAQMD 9-1-301 | Y | After Phase II Conversion | GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours | | N | | X | |
| | BAAQMD 9-1-302 | Y | After Phase II Conversion | 300 ppm (dry) | BAAQMD Condition 23868, Part 26f | P/A | Source test | X | |

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

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Applicable Limits and Compliance Monitoring Requirements
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S-7, S-8, S-9, & S-10 HEAT RECOVERY STEAM GENERATORS**

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|-----------------|---|--------|---------------------------|--|---|------------------------------|---------------------------------|------------|----|
| | | | | | | | | Yes | No |
| SO ₂ | NSPS Subpart KKKK 40 CFR 60.4330(a) (2) | Y | After Phase II Conversion | 0.060 lb SO ₂ /MMBtu | NSPS 40 CFR 60.4365(a) | N | None | X | |
| SO ₂ | None | Y | After Phase II Conversion | None | 40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3 | | Fuel measurements, calculations | X | |
| SO ₂ | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 6.43 tons/calendar year for All turbines and HRSGs combined including startup and shutdown of turbines | BAAQMD Condition 23688, Part 26f | P/A | Source test | X | |
| Opacity | BAAQMD 6-1-301 | N | After Phase II Conversion | > Ringelmann No. 1 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | SIP 6-301 | Y | After Phase II Conversion | > Ringelmann No. 1 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | BAAQMD condition #23688, part 18 | Y | After Phase II Conversion | > Ringelmann No. 1 for no more than 3 minutes in any hour or equivalent 20% opacity | | N | | X | |
| FP | BAAQMD 6-1-310 | Y | After Phase II Conversion | 0.15 grain/dscf | | N | | X | |
| FP | SIP 6-310 | Y | After Phase II Conversion | 0.15 grain/dscf | | Y | | X | |

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Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

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| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|------------------|-----------------------------------|--------|---------------------------|---|-----------------------------------|------------------------------|------------------------------------|------------|----|
| | | | | | | | | Yes | No |
| PM ₁₀ | BAAQMD condition #23688 part 22 | Y | After Phase II Conversion | 38.5 tons/year for all turbines and HRSGs combined including startup and shutdown. | BAAQMD condition #23688, part 26e | P/A | Source Test | X | |
| POC | BAAQMD condition #23688 part 10 | Y | After Phase II Conversion | 288 lb/day for all turbines and HRSGs combined during commissioning and including startup and shutdown of turbines without catalyst | BAAQMD condition #23688 part 26d | P/A | Source Test, records & calculation | X | |
| POC | BAAQMD condition #23688 part 10 | Y | After Phase II Conversion | 114 lb/day for all turbines and HRSGs combined during commissioning and including startup and shutdown of turbines with catalyst | BAAQMD condition #23688 part 26d | P/A | Source Test, records & calculation | X | |
| POC | BAAQMD condition #23688, part 19d | Y | After Phase II Conversion | 1 ppmv @ 15% O ₂ , dry, 1-hr average except during turbine startup or shutdown | BAAQMD condition #23688, part 26d | P/A | Source Test | X | |
| POC | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 20.2 lb/day for each turbine/ HRSG power train including startup and shutdown | BAAQMD condition #23688, part 26d | P/A | Source Test | X | |
| POC | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 80.8 lb/day for all turbines and HRSGs combined, including startup and shutdown | BAAQMD condition #23688, part 26d | P/A | Source Test | X | |
| POC | BAAQMD condition #23688 part 22 | Y | After Phase II Conversion | 12.3 tons/year for all turbines and HRSGs combined including startup and shutdown. | BAAQMD condition #23688, part 26d | P/A | Source Test | X | |

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

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Applicable Limits and Compliance Monitoring Requirements
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| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|-----------------|-----------------------------------|--------|---------------------------|--|--|-----------------------------------|--------------------|------------|----|
| | | | | | | | | Yes | No |
| NH ₃ | BAAQMD condition #23688, part 19b | N | After Phase II Conversion | 5 ppmv @ 15% O ₂ , dry, averaged over 3 hrs except during turbine startup or shutdown | BAAQMD condition #23688, parts 19b and 26b | C | Ammonia flow meter | X | |
| NH ₃ | BAAQMD condition #23688, part 19b | N | After Phase II Conversion | 5 ppmv @ 15% O ₂ , dry, averaged over 3 hrs except during turbine startup or shutdown | BAAQMD condition #23688, part 26b | P/A | Source Test | X | |
| NH ₃ | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 104 lb/day for each turbine/ HRSG power train including startup and shutdown | BAAQMD condition #23688, part 25b | P/A | Ammonia flow meter | X | |
| NH ₃ | BAAQMD condition #23688, part 22 | Y | After Phase II Conversion | 416 lb/day for all turbines and HRSGs combined, including startup and shutdown | BAAQMD condition #23688, part 25b | P/A | Ammonia flow meter | X | |
| NH ₃ | BAAQMD condition #23688 part 22 | Y | After Phase II Conversion | 56.9 tons/year for all turbines and HRSGs combined including startup and shutdown. | BAAQMD condition #23688, part 26b | P/A | Source test | X | |
| Formaldehyde | BAAQMD condition #23688 part 43 | Y | After Phase II Conversion | 6490 pounds/year for all turbines and HRSGs combined | BAAQMD condition #23688 parts 44 & 45 | P Startup and biennial thereafter | Source Test | X | |
| Acetaldehyde | BAAQMD condition #23688 part 43 | Y | After Phase II Conversion | 3000 pounds/year for all turbines and HRSGs combined | BAAQMD condition #23688 parts 44 & 45 | P Startup and biennial thereafter | Source Test | X | |
| Specified PAH's | BAAQMD condition #23688 part 43 | Y | After Phase II Conversion | 3.2 pounds/year for all turbines and HRSGs combined | BAAQMD condition #23688 parts 44 & 45 | P Startup and biennial thereafter | Source Test | X | |

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

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Applicable Limits and Compliance Monitoring Requirements
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| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|------------------|----------------------------------|--------|---------------------------|---|--------------------------------------|-----------------------------------|--|------------|----|
| | | | | | | | | Yes | No |
| Acrolein | BAAQMD condition #23688 part 43 | Y | After Phase II Conversion | 65.3 pounds/year for all turbines and HRSGs combined | BAAQMD condition #23688 parts 44 &45 | P Startup and biennial thereafter | Source Test | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 500 MM BTU/ hr (HHV), for each turbine | BAAQMD condition #23688, part 25d | C | Fuel meter, firing monitor, calculations | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 500 MM BTU/ hr (HHV), for each turbine | BAAQMD condition #23688, part 25d | P/M | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 500 MM BTU/ hr (HHV), for each turbine | BAAQMD condition #23688, part 25d | P/A | Source test | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 639 MM BTU/ hr (HHV), for each turbine w/ Duct Burner | BAAQMD condition #23688, part 25d | C | Fuel meter, firing monitor, calculations | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 639 MM BTU/ hr (HHV), for each turbine w/ Duct Burner | BAAQMD condition #23688, part 25d | P/M | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 639 MM BTU/ hr (HHV), for each turbine w/ Duct Burner | BAAQMD condition #23688, part 25d | P/A | Source test | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 12,000 MM BTU/day (HHV) for each turbine | BAAQMD condition #23688, part 25d | C | fuel meter, firing monitor, calculations | X | |

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

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Applicable Limits and Compliance Monitoring Requirements
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S-7, S-8, S-9, & S-10 HEAT RECOVERY STEAM GENERATORS**

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|------------------|----------------------------------|--------|---------------------------|---|-----------------------------------|------------------------------|--|------------|----|
| | | | | | | | | Yes | No |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 12,000 MM BTU/day (HHV) for each turbine | BAAQMD condition #23688, part 25d | P/Q | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 15,366 MM BTU/day (HHV) for each turbine w/ Duct Burner | BAAQMD condition #23688, part 25d | C | fuel meter, firing monitor, calculations | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 15,366 MM BTU/day (HHV) for each turbine w/ Duct Burner | BAAQMD condition #23688, part 25d | P/Q | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 18,215,000 MM BTU/yr (HHV) for all turbines w/ Duct Burners | BAAQMD condition #23688, part 25d | C | fuel meter, firing monitor, calculations | X | |
| Heat input limit | BAAQMD condition #23688, part 24 | Y | After Phase II Conversion | 18,215,000 MM BTU/yr (HHV) for all turbines w/ Duct Burners | BAAQMD condition #23688, part 25d | P/Q | Fuel composition analysis | X | |
| Unabated firing | BAAQMD condition #23688, part 8 | Y | After Phase II Conversion | 250 hours during commissioning | BAAQMD condition #23688, part 8 | P/H | Records | X | |
| MW | N/A | | After Phase II Conversion | None | BAAQMD condition #23688, part 26h | P/A | Source test | X | |
| Gas temperature | N/A | | After Phase II Conversion | None | BAAQMD condition #23688, part 26j | P/A | Source test | X | |

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

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Applicable Limits and Compliance Monitoring Requirements
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| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|--------------------------------|-------------------|--------|---------------------------|-------|-----------------------------------|------------------------------|-----------------|------------|----|
| | | | | | | | | Yes | No |
| Stack gas flow | N/A | | After Phase II Conversion | None | BAAQMD condition #23688, part 26i | P/A | Source test | X | |
| NH ₃ injection rate | N/A | | After Phase II Conversion | None | BAAQMD condition #23688, part 26k | P/A | Source test | X | |
| Water injection rate | N/A | | After Phase II Conversion | None | BAAQMD condition #23688, part 26l | P/A | Source test | X | |

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

**Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S-5 FIRE PUMP DIESEL ENGINE**

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|--------------------|--|--------|-----------------------|---|--|------------------------------|--------------------|------------|----|
| | | | | | | | | Yes | No |
| Opacity | BAAQMD 6-1-303.1 | Y | | >Ringelmann No.2 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | SIP Regulation 6-303.1 | Y | | Ringelmann 2.0 for 3 minutes in any hour | | Y | | X | |
| FP | BAAQMD 6-1-310 | Y | | 0.15 gr/dscf Particulate Weight Limitation | | N | | X | |
| FP | SIP Regulation 6-310 | Y | | 0.15 gr/dscf | | Y | | X | |
| SO ₂ | BAAQMD 9-1-301 | N | | GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours | | N | | X | |
| SO ₂ | BAAQMD 9-1-304 | Y | | 0.5% sulfur in fuel by weight | BAAQMD Condition #19610, part 39 | P/E | Fuel certification | X | |
| Hours of operation | BAAQMD Regulation 9-8-330.1 | N | | Emergency use for an unlimited number of hours | BAAQMD Regulation 9-8-530 | P | Records | X | |
| Hours of operation | 40 CFR Part 63, Subpart ZZZZ, 63.6640 (f)(1)(ii) | Y | | Maintenance checks and readiness testing less than 100 hr/yr | 40 CFR Part 63, Subpart ZZZZ, 63.6655(e) | P | Records | X | |
| Hours of operation | BAAQMD Condition #19610, part 39 | N | | Reliability related activities less than 50 hr/yr | BAAQMD Condition #19610, parts 41 & 42 | C P/E | Records | X | |

**Los Esteros Critical Energy Facility
Title V CEMS Semi-Annual Monitoring Report
June 1, 2012 – November 30, 2012**

**Table VII – C
Applicable Limits and Compliance Monitoring Requirements
[S-11 Cooling Tower will apply after the Phase II Combined Cycle Conversion]
S-11 SIX CELL COOLING TOWER**

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|---------------|----------------------------------|--------|---------------------------|---|----------------------------------|---|-----------------|------------|----|
| | | | | | | | | Yes | No |
| Opacity | BAAQMD 6-1-301 | N | After Phase II Conversion | ≥ Ringelmann No. 1 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | SIP 6-301 | Y | After Phase II Conversion | > Ringelmann No. 1 for no more than 3 minutes in any hour | | N | | X | |
| FP | BAAQMD 6-1-310 | N | After Phase II Conversion | 0.15 grain/dscf | | N | | X | |
| FP | SIP 6-310 | Y | After Phase II Conversion | 0.15 grain/dscf | | N | | X | |
| Drift Rate | BAAQMD condition #23688, part 46 | N | After Phase II Conversion | 0.0005% | BAAQMD condition #23688, part 47 | P Initial, then 5 th and 15 th Year | Source Test | X | |
| TDS | BAAQMD condition #23688, part 46 | N | After Phase II Conversion | < 6,000 ppmw | BAAQMD condition #23688, part 46 | P/D | TDS Test | X | |