

Gilroy Energy Center, LLC for the Wolfskill Energy Center

2425 Cordelia Road
Fairfield, CA 94533

January 18, 2022

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V

TV Tracking #: 362

1. RECEIVED IN ENFORCEMENT: 01/20/2022

**Subject: Gilroy Energy Center, LLC for the Wolfskill Energy Center
Title V Semi-Annual Monitoring Report
Facility # B4511
Reporting Period: July 1, 2021 through December 31, 2021**

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Wolfskill Energy Center ("WEC") for the reporting period from July 1, 2020 through December 31, 2020.

The Facility briefly experienced a period where its CO, NOx, and O2 monitors were inoperative during operation. The CEMS was inoperative from 17:39 pm on August 10th, 2021 until 17:19 on August 11th, 2021. The attached RCA form (Report ID: 08B14), was submitted to notify the District of inoperative CEMS on August 11th, 2021. Salvador Rueda, BAAQMD Inspector, was notified of operational CEMS via phone at 07:49 on August 12th, 2021.

By signing this report, I am certifying that based on information and belief formed after reasonable inquiry, the statements and information in the attached report are true, accurate, and complete.

If you have any questions or require additional information, please contact me at (707) 399-4395.

Sincerely,



Andrew Gundershaug
Plant Manager and Designated Representative/Responsible Official

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-2 – COMBUSTION GAS TURBINE
July 1, 2021 through December 31,2021

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 9-9-301.1.3	N		9 ppmv @ 15% O2, dry	BAAQMD 9-9-501 and BAAQMD condition #19684, part 23c	C	CEM	X	
NOx	SIP 9-9-301.3	Y		9 ppmv @ 15% O2, dry	SIP 9-9-501 and BAAQMD condition #19684, part 23c	C	CEM	X	
NOx	BAAQMD 9-9-301.1.3	Y		9 ppmv @ 15% O2, dry	BAAQMD condition #19684, part 24a	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
NOx	SIP 9-9-301.3	Y		9 ppmv @ 15% O2, dry	BAAQMD condition #19684, part 24a	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
NOx	BAAQMD 9-9-301.2	N		0.43 lbs/MWhr or 9 ppmv @ 15% O2, dry	BAAQMD 9-9-501 and BAAQMD condition #19684, part 23c	C	CEM	X	
NOx	NSPS, 40 CFR 60 Subpart GG CFR 60.332 (a)(1)	Y		75 ppmv @ 15% O2, dry	NSPS 40 CFR 60.334(b)	C	CEM	X	
NOx	None	Y		None	40 CFR 75.10	C	CEM	X	
NOx	BAAQMD condition #19684, part 18.1	Y		2.5 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, part 18.1	C	CEM	x	
NOx	BAAQMD condition #19684, part 18.1	Y		2.5 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, part 24a	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
NOx	BAAQMD condition #19684, part 21	Y		109 lb/ day (as NO2)	BAAQMD condition #19684, part 23c	C	CEM	X	
NOx	BAAQMD condition #19684, part 21	Y		14.7 tons per year (as NO2)	BAAQMD condition #19684, part 23c	C	CEM	X	

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 #19684, part 18.3	Y		6 ppmv @ 15% O ₂ , dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, parts 18.3 and 23c	C	CEM	X	
CO	BAAQMD condition #19684, part 18.3	Y		6 ppmv @ 15% O ₂ , dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, part 24c	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
CO	BAAQMD condition #19684, part 21	Y		159 lb/ day	BAAQMD condition #19684, part 23c	C	CEM	X	
CO	BAAQMD condition #19684, part 21	Y		21.5 tons per year	BAAQMD condition #19684, part 23c	C	CEM	X	
CO ₂		Y		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		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		300 ppm (dry)	BAAQMD condition #19684, part 23e	N	None	X	
SO ₂	NSPS 40 CFR 60 Subpart GG60.333(a)	Y		0.015% (vol.) @ 15% O ₂ (dry)	NSPS 40 CFR 60.334(h)(3)	N	None	X	
SO ₂	None	Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measurements, calculations	X	
SO ₂	BAAQMD condition #19684, part 18.6	Y		1.38 lb/hr	BAAQMD condition #19684, part 23e	P/Q	Fuel gas Total sulfur content analysis	X	
SO ₂	BAAQMD condition #19684, part 18.6	Y		1.38 lb/hr	BAAQMD condition #19684, part 24f	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
SO ₂	BAAQMD condition #19684, part 21	Y		32 lb/ day	BAAQMD condition #19684, part 23e	P/Q	Fuel Gas Total sulfur content analysis	X	

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
SO2	BAAQMD condition #19684, part 21	Y		4.5 tons/year	BAAQMD condition #19684, part 23e	P/Q	Fuel gas Total sulfur content analysis	X	
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	BAAQMD condition #19684, part 18	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour or equivalent 20% opacity		N		X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		X	
FP	SIP 6-310	Y		0.15 grain/dscf		N		X	
PM10	BAAQMD condition #19684, part 18.5	Y		3 lb/ hr	BAAQMD condition #19684, part 24e	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
PM10	BAAQMD condition #19684, part 21	Y		72 lb/day	BAAQMD condition #19684, parts 23d, 24e	P/A	Source Test every 8,000 hrs or every 3 yrs, whichever comes first	X	
PM10	BAAQMD condition #19684, part 21	Y		13.1 tons/year	BAAQMD condition #19684, part 24e	P/A	Source Test every 8,000 hrs or every 3 yrs, whichever comes first	X	
POC	BAAQMD condition #19684, part 18.4	Y		2 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, part 24d	C	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
POC	BAAQMD condition #19684, part 18.4	Y		2 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, part 24d	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	

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
POC	BAAQMD condition #19684, part 21	Y		31 lb/calendar day	BAAQMD condition #19684, part 24d	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
POC	BAAQMD condition #19684, part 21	Y		4.1 ton/year	BAAQMD condition #19684, part 24d	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
NH3	BAAQMD condition #19684, Part 18.2	N		10 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, parts 18.2 and 23b	C	Calculation based on source test and NH3 to NOx ratio at inlet to SCR	X	
NH3	BAAQMD condition #19684, Part 18.2	N		10 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, part 24b	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #19684, part 23d	C	Fuel meter, firing monitor	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #19684, part 23d	P/Q	Fuel composition analysis	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #19684, part 24g	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		12,000 MM BTU/day (HHV)	BAAQMD condition #19684, part 23d	C	fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		12,000 MM BTU/day (HHV)	BAAQMD condition #19684, part 23d	P/Q	Fuel composition analysis	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		4,380,000 MM BTU/yr (HHV)	BAAQMD condition #19684, part 23d	C	fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		4,380,000 MM BTU/yr (HHV)	BAAQMD condition #19684, part 24d	P/Q	Fuel composition analysis	X	

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
MW				None	BAAQMD condition #19684, part 24h	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
Exhaust Gas temperature				None	BAAQMD condition #19684, part 24j	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
Stack gas flow rate				None	BAAQMD condition #19684, part 24i	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first	X	
NH3 injection rate				None	BAAQMD condition #19684, part 24k	P/A	Source test District approved correct ammonia slip calculation and correction factor determined by source test with source. test every 8,000 hrs or every 3 yrs, whichever comes first	X	
Start-up Period	BAAQMD condition #19684, part 19	Y		60 minutes per start-up	BAAQMD condition #19684, part 30(b)	P/E	Records	X	
Shutdown Period	BAAQMD condition #19684, part 20	Y		30 minutes per shutdown	BAAQMD condition #19684, part 30(b)	P/E	Records	X	
Fuel Sulfur Content	40 CFR 60.333(b)	Y		0.8 percent by weight (8000 ppmw) sulfur	40 CFR 60.334(h)(1)	P	Fuel Sulfur Content Testing	X	

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S-2 – 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 Regulation 6-1-301	N		< Ringelmann No. 1 for more than 3 min/hr		N		X	
Opacity	SIP Regulation 6-301	Y		< Ringelmann No. 1 for more than 3 min/hr		N		X	
Particulate Weight	BAAQMD Regulation 6-1-310	N		0.15 grains per dscf		N		X	
Particulate Weight	SIP Regulation 6-310	Y		0.15 grains per dscf		N		X	
Particulate Weight	BAAQMD Regulation 6-1-311	N		40 lb/hr	N	N		X	
Particulate Weight	SIP Regulation 6-311	Y		40 lb/hr	N	N		X	



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

[See back of form for instructions](#) →

1. **BREAKDOWN RELIEF: *District Use Only* BREAKDOWN REFERENCE #:**

2. **MONITOR EXCESS EMISSION or EXCURSION: *District Use Only* REFERENCE #:**

3. **MONITOR IS INOPERATIVE: *District Use Only* REFERENCE #:**

4. **PRESSURE RELIEF DEVICE (PRD): *District Use Only* PRD REFERENCE #:**

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	Gilroy Energy Center, LLC at the Wolfskill Energy Center	Site #	
Address	2425 Cordelia Road, Fairfield, CA 94534	Source #	
Reported by		Phone #	
Indicated Excess		Fax #	
Allowable Limit		Averaging Time	
Start Time/Date		Clear Time	
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	<input type="checkbox"/> ▶ H ₂ S
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	<input type="checkbox"/> ▶ TRS
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ mmHg
			<input type="checkbox"/> ▶ Other (describe) lbs/hr, lbs/day

Event Description:

District Use Only

Received by

Date

Time

General Instructions

- ✓ Check the Box numbers 1- 4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- ✓ You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to rca@baaqmd.gov
- ✓ **A 30-day written follow-up report is required for Breakdown Requests and PRD Releases.** Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference [Breakdown Admissions Advisory dated 12/3/04](#). Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: **You may have additional report requirements under Title V.**

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

- Check Box #1.
- **NOTE: Start and end times given for these events in the required information section must be inclusive of all events.**
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD immediately upon discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

When a BAAQMD-required monitor is inoperative for greater than 24 hours, you must report it to the BAAQMD.

- Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All PRD release reports must be reported by the following BAAQMD working day.