

# **Gilroy Energy Center, LLC**

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Riverview Energy Center  
2425 Cordelia ROAD  
Fairfield, CA. 94534

January 25, 2012

U.S. EPA  
75 Hawthorne Street  
San Francisco, CA. 94105  
Attn: AIR-3

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
Attn: Title V Reports


**Re: Riverview Energy Center Facility B4512  
Title V Semi-Annual Monitoring Report  
Reporting Period: July 1, 2011 through December 31, 2011**

Dear Sir or Madam:

Enclosed is the Title V Semi-Annual Monitoring Report for the Riverview Energy Center for the reporting period from July 1, 2011 through December 31, 2011. There were no instances of excess emissions, Inoperative Monitor or non-compliance during this reporting period associated with the operation of the plant.

As the Responsible Official, I certify that these Reports are true, accurate and complete. If you have any questions, please contact me at (707) 399-4393.

Sincerely,



Fernando Parra  
Plant Manager

Enclosures

Ccc: Barbara McBride  
Dave Williams  
Bob Ibrahim

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, TURBINE #1**  
**JULY 1, 2011 THROUGH DECEMBER 31, 2011**

NOx	Limit	Y		Limit	Monitoring	CEM	CEM	X	
NOx	BAAQMD 9-9-301.3	Y		9 ppmv @ 15% O <sub>2</sub> , dry	BAAQMD 9-9-501 and BAAQMD condition #20010, part 23c	C	CEM	X	
	BAAQMD 9-9-301.3	Y		9 ppmv @ 15% O <sub>2</sub> , dry	BAAQMD condition #20010, part 24a	P/A	Source Testing	X	
	None	Y		None	40 CFR 75.10	C	CEM	X	
NOx	NSPS, 40 CFR 60.332 (a)(1)	Y		99ppmv @ 15% O <sub>2</sub> , dry	Monitoring requirement subsumed by monitoring for BACT limit. See Permit Shield	N		X	
NOx	BAAQMD condition #20010, part 18.1	Y		2.5 ppm @15% O <sub>2</sub> , dry 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 18.1	C	CEM	X	
	BAAQMD condition #20010, part 18.1	Y		2.5 ppm @15% O <sub>2</sub> , dry 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24a	P/A	Source Test	X	
	BAAQMD condition #20010, part 21	Y		109 lb/ day (as NO <sub>2</sub> )	BAAQMD condition #20010, part 23c	C	CEM	X	

**VII. Applicable Limits and Compliance Monitoring Requirements**

Parameter	Condition	Y/N	Limit	Condition	Category	Monitoring	Compliance
NOx	BAAQMD condition #20010, part 21	Y	14.7 (tons per year (as NO2))	BAAQMD condition #20010, part 23c	C	CEM	X
CO	BAAQMD condition #20010, part 18.3	Y	6 ppmv, @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, parts 18.3 and 23c	C	CEM	X
	BAAQMD condition #20010, part 18.3	Y	6 ppmv, @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24c	P/A	Source Test	X
	BAAQMD condition #20010, part 21	Y	159 lb/day	BAAQMD condition #20010, part 23c	C	CEM	X
CO	BAAQMD condition #20010, part 21	Y	21.5 tons per year	BAAQMD condition #20010, part 23c	C	CEM	X
CO2		Y	None	40 CFR 75.10	C	CEM (CO2) or CEM (O2) or fuel flow monitor	X

### VII. Applicable Limits and Compliance Monitoring Requirements

Parameter	Standard	Applicable	Limit	Monitoring Method	Frequency	Method	Analysis	Compliance
SO2	BAAQMD 9-1-301	Y	GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours			N	CEM	X
	BAAQMD 9-1-302	Y	100 ppm (dry)	BAAQMD condition #20010, part 23c		P/Q	Fuel Gas Total sulfur content analysis	X
SO2	NSPS 40 CFR 60.333(a)	Y	0.015% (vol) @ 15% O <sub>2</sub> (dry)	Monitoring Requirements subsumed by requirement for PUC quality natural gas. See Permit Shield.		N	CEM	X
SO2	None	Y	None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3			Fuel measurements, calculations	X
	BAAQMD condition #20010, part 18.6	Y	1.38 lb/hr	BAAQMD condition #20010, part 23c		P/Q	Fuel gas Total sulfur content analysis	X
SO2	BAAQMD condition #20010, part 18.6	Y	1.38 lb/hr	BAAQMD condition #20010, part 24f		P/A	Source test	X
	BAAQMD condition #20010, part 21	Y	32 lb/ day	BAAQMD condition #20010, part 23c		P/Q	Fuel Gas Total sulfur content analysis	X
	BAAQMD condition #20010, part 21	Y	4.5 tons/year	BAAQMD condition #20010, part 23c		P/Q	Fuel Gas Total sulfur content analysis	X

**VII. Applicable Limits and Compliance Monitoring Requirements**

Parameter	Standard	Applicable	Limit	Monitoring Method	Compliance	Monitoring	Notes	Compliance	Notes
Opacity	BAAQMD 6-301	Y	> Ringelmann No. 1 for no more than 3 minutes in any hour		N			X	
Opacity	BAAQMD condition #20010, part 18	Y	> Ringelmann No. 1 for no more than 3 minutes in any hour or equivalent 20% opacity		N			X	
FP	BAAQMD 6-310	Y	0.15 grains/dscf		N			X	
PM10	BAAQMD condition #20010, part 18.5	Y	3 lb/hr	BAAQMD condition #20010, part 24c	P/A	Source Test		X	
	BAAQMD condition #20010, part 21	Y	72 lb/day	BAAQMD condition #20010, parts 23d, 24c	P/A	Source Test		X	
PM10	BAAQMD condition #20010, part 21	Y	9.8 tons/year	BAAQMD condition #20010, part 24e	P/A	Source Test		X	
POC	BAAQMD condition #20010, part 18.4	Y	2 ppmv @ 15% O2, dry, 1-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24d	C	Source Test		X	

**VII. Applicable Limits and Compliance Monitoring Requirements**

Parameter	Condition	Y/N	Unit	Limit	Condition	Method	Frequency	Compliance	Notes
	BAAQMD condition #20010, part 18.4	Y		2 ppmv @ 15% O <sub>2</sub> , dry, 1-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24d	P/A	Source Test	X	
	BAAQMD condition #20010, part 21	Y		31 lb/calendar day	BAAQMD condition #20010, part 24d	P/A	Source Test	X	
	BAAQMD condition #20010, part 21	Y		4.1 ton/year	BAAQMD condition #20010, part 24d	P/A	Source Test	X	
NH <sub>3</sub>	BAAQMD condition #20010, part 18.2	Y		10 ppmv @ 15% O <sub>2</sub> , dry, averaged over 1 hr except during turbine startup or shutdown	BAAQMD condition #20010, parts 18.2 and 23b	C	Measurement ratio NH <sub>3</sub> to NO <sub>x</sub> inlet rate at SCR	X	

**VII. Applicable Limits and Compliance Monitoring Requirements**

Type of Limit	Citation of Limit	FD	Future Effective Date	Limit	Monitoring Parameter or Label	Monitoring Frequency (P/Q/N)	Monitoring Type	Compliance	
								Test	Calc
	BAAQMD condition #20010, part 18.2	N		10ppmv @15% O <sub>2</sub> , dry, averaged over 1 hr except during turbine startup or shutdown	BAAQMD condition #20010, part 24b	P/A	Source Test	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		500 MMBTU/hr (HHV)	BAAQMD condition #20010, part 23d	C	Fuel meter, firing monitor	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		500 MMBTU/hr (HHV)	BAAQMD condition #20010, part 23d	P/Q	Fuel composition analysis	X	
	BAAQMD condition #20010, part 22	Y		500 MMBTU/hr (HHV)	BAAQMD condition #20010, part 24g	P/A	Source test	X	
	BAAQMD condition #20010, part 22	Y		12,000 MMBTU/day (HHV)	BAAQMD condition #20010, part 23d	C	Fuel meter, firing monitor, calculations	X	
	BAAQMD condition #20010, part 22	Y		12,000 MMBTU/day (HHV)	BAAQMD condition #20010, part 23d	P/Q	Fuel composition analysis	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		3,250,000 MMBTU/yr (HHV)	BAAQMD condition #20010, part 23d	C	Fuel meter, firing monitor, calculations	X	

### VII. Applicable Limits and Compliance Monitoring Requirements

Parameter	Applicable Condition	Yes/No	Other	Limit	Monitoring Method	Frequency	Monitoring Method	Records	Other
	BAAQMD condition #20010, part 22	Y		1,250,000 MMBTU/yr (HHV)	BAAQMD condition #20010, part 24d	P/Q	Fuel composition analysis	X	
Unassisted firing	BAAQMD condition #20010, part 8	Y		100 hours during commissioning	BAAQMD condition #20010, part 8	P/H	Records	X	
MW				None	BAAQMD condition #20010, part 24h	P/A	Source test	X	
Exhaust Gas temperature				None	BAAQMD condition #20010, part 24j	P/A	Source test	X	
Stack gas flow rate				None	BAAQMD condition #20010, part 24i	P/A	Source test	X	
NO <sub>x</sub> injection rate				None	BAAQMD condition #20010, part 24k	P/A	Source test	X	
Start-up Period	BAAQMD condition #20010, part 19			60 minutes per start-up	BAAQMD condition #20010, part 30(b)	P/E	Records	X	
Shutdown Period	BAAQMD condition #20010, part 20			30 minutes per shutdown	BAAQMD condition #20010, part 30(b)	P/E	Records	X	



**VII. Applicable Limits and Compliance Monitoring Requirements**

**Table VII - B  
 Applicable Limits and Compliance Monitoring Requirements  
 S2 - COOLING TOWER**

Parameter	Applicable Limit	Compliance	Monitoring	Method	Standard	Frequency	Reporting	Compliance	Notes
Opacity	BAAQMD Regulation 6-301	Y		< Ringelmann 1 for more than 3 min/hr		N		X	
Particulate Weight	BAAQMD Regulation 6-301	Y		0.15 grains per dscf		N		X	