

# Russell City Energy Company, LLC

TV Tracking #: 967 (Semi-Annual)

717 Texas Avenue  
Suite 1000  
Houston, TX 77002

1.  RECEIVED IN  
ENFORCEMENT: 07/31/2024

July 30, 2024

Bay Area Air Quality Management District  
Attn: Title V Reports  
375 Beale Street, Suite 600  
San Francisco, CA 94105-2097

Re: **Title V CEMS Semi-Annual Monitoring Report**  
**Reporting Period: January 1, 2024 – June 30, 2024**  
**Russell City Energy Center- Plant Number 18136**

To the Bay Area Air Quality Management District,

Enclosed is the Title V CEMS Semi-Annual Compliance Monitoring Report for the Russell City Energy Center (RCEC).

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

If you have any questions or require additional information, please contact me at (510) 731-1403

Sincerely,

DocuSigned by:

*Jason Jin*

7428634CB0674C0...

Jason Jin  
Authorized Signatory and Plant Manager  
Russell City Energy Center

**Title V CEMS Semi-Annual Monitoring Report**

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2024 to June 30, 2024

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**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-3 GAS TURBINE**  
**S-2, S-4 HEAT RECOVERY STEAM GENERATOR**

| Type of Limit   | Citation of Limit                         | FE Y/N | Future Effective Date | Limit  | Monitoring Requirement Citation      | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance |    | Notes |
|-----------------|---|--------|-----------------------|--|--------------------------------------|------------------------------|-----------------|------------|----|-------|
|                 |   |        |                       |  |                                      |                              |                 | Yes        | No |       |
| NO <sub>x</sub> | BAAQMD 9-3-303                            | N      |                       | 125 ppm  | BAAQMD 1-520.1                       | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | BAAQMD 9-9-301.1.3                        | Y      |                       | 9 ppmv @ 15% O <sub>2</sub> , dry  | BAAQMD 9-9-501                       | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | BAAQMD 9-9-301.2                          | N      |                       | 0.15 lb/MW-hr or 5 ppmv  | BAAQMD 9-9-501                       | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | SIP 9-9-301.3                             | Y      |                       | 9 ppmv @ 15% O <sub>2</sub> , dry  | BAAQMD 9-9-501                       | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | 40 CFR 60 Subpart KKKK 60.4320(a) Table 1 | Y      |                       | 15 ppm at 15% O <sub>2</sub> or 0.43 lb/MW-hr  | 40 CFR 60 Subpart KKKK 60.4340(b)(1) | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> |   | Y      |                       | None   | 40 CFR 75.10                         | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 19a         | Y      |                       | 16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 26b    | C                            | CEM             | X          |    |       |

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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 |    | Notes |
|-----------------|---|--------|-----------------------|--|---|------------------------------|-----------------------------|------------|----|-------|
|                 |   |        |                       |  |   |                              |                             | Yes        | No |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 19a             | Y      |                       | 16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 30              | P/A                          | Source test at maximum load | X          |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 19a | Y      |                       | 16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 26b | C                            | CEM                         | X          |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 19a | Y      |                       | 16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 30  | P/A                          | Source test at maximum load | X          |    |       |

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|---------------|---|--------|-----------------------|---|---|------------------------------|-----------------------------|------------|----|-------|
|               |   |        |                       |   |   |                              |                             | Yes        | No |       |
| NOx           | BAAQMD condition #23763, part 19a             | Y      |                       | 0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 26b             | C                            | CEM                         | X          |    |       |
| NOx           | BAAQMD condition #23763, part 19a             | Y      |                       | 0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 30              | P/A                          | Source test at maximum load | X          |    |       |
| NOx           | Federal PSD Permit condition #26117, part 19a | Y      |                       | 0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 26b | C                            | CEM                         | X          |    |       |

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|-----------------|---|--------|-----------------------|---|--|------------------------------|-----------------------------|------------|----|-------|
|                 |   |        |                       |   |  |                              |                             | Yes        | No |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 19a | Y      |                       | 0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations.                                 | Federal PSD Permit condition #26117, part 30 | P/A                          | Source test at maximum load | X          |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 19b             | Y      |                       | 2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 26b            | C                            | CEM                         | X          |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 19b             | Y      |                       | 2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 30             | P/A                          | Source test at maximum load | X          |    |       |

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|-----------------|---|--------|-----------------------|---|---|------------------------------|-----------------------------|------------|----|-------|
|                 |   |        |                       |   |   |                              |                             | Yes        | No |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 19b | Y      |                       | 2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 26b | C                            | CEM                         | X          |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 19b | Y      |                       | 2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 30  | P/A                          | Source test at maximum load | X          |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 20              | Y      |                       | 95 lb/turbine during hot start-up   | BAAQMD condition #23763, part 26              | P/D                          | Records, calculations       | X          |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 20  | Y      |                       | 95 lb/turbine during hot start-up   | Federal PSD Permit condition #26117, part 26  | P/D                          | Records, calculations       | X          |    |       |

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|---------------|--|--------|-----------------------|---|--|------------------------------|-----------------------|------------|----|-------|
|               |  |        |                       |   |  |                              |                       | Yes        | No |       |
| NOx           | BAAQMD condition #23763, part 20             | Y      |                       | 40 lb/turbine during shutdown                                     | BAAQMD condition #23763, part 26             | P/D                          | Records, calculations | X          |    |       |
| NOx           | Federal PSD Permit condition #26117, part 20 | Y      |                       | 40 lb/turbine during shutdown                                     | Federal PSD Permit condition #26117, part 26 | P/D                          | Records, calculations | X          |    |       |
| NOx           | BAAQMD condition #23763, part 20             | Y      |                       | 480 lb/turbine during cold start-up or combustor tuning operation | BAAQMD condition #23763, part 26             | P/D                          | Records, calculations | X          |    |       |
| NOx           | Federal PSD Permit condition #26117, part 20 | Y      |                       | 480 lb/turbine during cold start-up or combustor tuning operation | Federal PSD Permit condition #26117, part 26 | P/D                          | Records, calculations | X          |    |       |
| NOx           | BAAQMD condition #23763, part 20             | Y      |                       | 125 lb/turbine during warm start-up                               | BAAQMD condition #23763, part 26             | P/D                          | Records, calculations | X          |    |       |
| NOx           | Federal PSD Permit condition #26117, part 20 | Y      |                       | 125 lb/turbine during warm start-up                               | Federal PSD Permit condition #26117, part 26 | P/D                          | Records, calculations | X          |    |       |

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|-----------------|---|--------|-----------------------|--|--|------------------------------|-----------------|------------|----|-------|
|                 |   |        |                       |  |  |                              |                 | Yes        | No |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 22a             | Y      |                       | 1,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning | BAAQMD condition #23763, part 26             | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 22a | Y      |                       | 1,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning | Federal PSD Permit condition #26117, part 26 | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 22b             | Y      |                       | 1225 lb/day for turbines, HRSGs, and fire pump diesel engine, combined during ozone season from June 1 through September 30        | BAAQMD condition #23763, part 26             | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 23a             | Y      |                       | 127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)               | BAAQMD condition #23763, part 26             | C                            | CEM             | X          |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 23a | Y      |                       | 127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)               | Federal PSD Permit condition #26117, part 26 | C                            | CEM             | X          |    |       |



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|-----------------|---|--------|-----------------------|--|--|------------------------------|----------------------------|------------|----|-------|
|                 |   |        |                       |  |  |                              |                            | Yes        | No |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 51a             | Y      |                       | 4,800 lbs. from commissioning activities for black start capability  | BAAQMD condition #23763, part 52             | P/E                          | CEM, records, calculations | NA         |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 63a |        |                       | 4,800 lbs. from commissioning activities for black start capability  | Federal PSD Permit condition #26117, part 64 | P/E                          | CEM, records, calculations | NA         |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 53a             |        |                       | 5,760 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | BAAQMD condition #23763, part 26             | P/E                          | CEM, records, calculations | NA         |    |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 65a |        |                       | 5,760 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | Federal PSD Permit condition #26117, part 26 | P/E                          | CEM, records, calculations | NA         |    |       |
| NO <sub>x</sub> | BAAQMD condition #23763, part 54a             |        |                       | 11,520 lbs. for both turbines combined during a black start emergency event  | BAAQMD condition #23763, part 26             | P/E                          | CEM, records, calculations | NA         |    |       |

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|-----------------|---|--------|-----------------------|--|--|------------------------------|---|------------|----|-------|
|                 |   |        |                       |  |  |                              |   | Yes        | No |       |
| NO <sub>x</sub> | Federal PSD Permit condition #26117, part 66a |        |                       | 11,520 lbs. for both turbines combined during a black start emergency event  | Federal PSD Permit condition #26117, part 26 | P/E                          | CEM, records, calculations              | NA         |    |       |
| CO              | BAAQMD condition #23763, part 19c             | Y      |                       | 10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 26b            | C                            | CEM                                     | X          |    |       |
| CO              | BAAQMD condition #23763, part 19c             | Y      |                       | 10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 30             | P/A                          | Source test at maximum and minimum load | X          |    |       |

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|---------------|---|--------|-----------------------|--|---|------------------------------|---|------------|----|-------|
|               |   |        |                       |  |   |                              |   | Yes        | No |       |
| CO            | Federal PSD Permit condition #26117, part 19c | Y      |                       | 10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations.         | Federal PSD Permit condition #26117, part 26b | C                            | CEM                                     | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 19c | Y      |                       | 10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations.         | Federal PSD Permit condition #26117, part 30  | P/A                          | Source test at maximum and minimum load | X          |    |       |
| CO            | BAAQMD condition #23763, part 19c             | Y      |                       | 0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 26b             | C                            | CEM                                     | X          |    |       |

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|---------------|---|--------|-----------------------|--|---|------------------------------|---|------------|----|-------|
|               |   |        |                       |  |   |                              |   | Yes        | No |       |
| CO            | BAAQMD condition #23763, part 19c             | Y      |                       | 0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 30              | P/A                          | Source test at maximum and minimum load | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 19c | Y      |                       | 0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 26b | C                            | CEM                                     | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 19c | Y      |                       | 0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 30  | P/A                          | Source test at maximum and minimum load | X          |    |       |

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|---------------|---|--------|-----------------------|---|---|------------------------------|---|------------|----|-------|
|               |   |        |                       |   |   |                              |   | Yes        | No |       |
| CO            | BAAQMD condition #23763, part 19d             | Y      |                       | 2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 26b             | C                            | CEM                                     | X          |    |       |
| CO            | BAAQMD condition #23763, part 19d             | Y      |                       | 2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #13763, part 30              | P/A                          | Source test at maximum and minimum load | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 19d | Y      |                       | 2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 26b | C                            | CEM                                     | X          |    |       |

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|---------------|---|--------|-----------------------|---|--|------------------------------|---|------------|----|-------|
|               |   |        |                       |   |  |                              |   | Yes        | No |       |
| CO            | Federal PSD Permit condition #26117, part 19d | Y      |                       | 2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | Federal PSD Permit condition #26117, part 30 | P/A                          | Source test at maximum and minimum load | X          |    |       |
| CO            | BAAQMD condition #23763, part 20              | Y      |                       | 891 lb/turbine during hot start-up  | BAAQMD condition #23763, part 26             | P/D                          | Records, calculations                   | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 20  | Y      |                       | 891 lb/turbine during hot start-up  | Federal PSD Permit condition #26117, part 26 | P/D                          | Records, calculations                   | X          |    |       |
| CO            | BAAQMD condition #23763, part 20              | Y      |                       | 2,514 lb/turbine during warm start-up   | BAAQMD condition #23763, part 26             | P/D                          | Records, calculations                   | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 20  | Y      |                       | 2,514 lb/turbine during warm start-up   | Federal PSD Permit condition #26117, part 26 | P/D                          | Records, calculations                   | X          |    |       |

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|---------------|---|--------|-----------------------|--|---|------------------------------|-----------------------|------------|----|-------|
|               |   |        |                       |  |   |                              |                       | Yes        | No |       |
| CO            | BAAQMD condition #23763, part 20              | Y      |                       | 100 lb/turbine during shutdown   | BAAQMD condition #23763, part 26              | P/D                          | Records, calculations | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 20  | Y      |                       | 100 lb/turbine during shutdown   | Federal PSD Permit condition #26117, part 26  | P/D                          | Records, calculations | X          |    |       |
| CO            | BAAQMD condition #23763, part 20              | Y      |                       | 2,514 lb/turbine during cold start-up or combustor tuning operation    | BAAQMD condition #23763, part 26              | P/D                          | Records, calculations | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 20  | Y      |                       | 2,514 lb/turbine during cold start-up or combustor tuning operation    | Federal PSD Permit condition #26117, part 26  | P/D                          | Records, calculations | X          |    |       |
| CO            | BAAQMD condition #23763, part 22c             | Y      |                       | 7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined | BAAQMD condition #23763, part 26b             | C                            | CEM                   | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 22c | Y      |                       | 7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined | Federal PSD Permit condition #26117, part 26b | C                            | CEM                   | X          |    |       |

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|---------------|---|--------|-----------------------|--|---|------------------------------|----------------------------|------------|----|-------|
|               |   |        |                       |  |   |                              |                            | Yes        | No |       |
| CO            | BAAQMD condition #23763, part 23b             | Y      |                       | 330 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)                          | BAAQMD condition #23763, part 26b             | C                            | CEM                        | X          |    |       |
| CO            | Federal PSD Permit condition #26117, part 23b | Y      |                       | 330 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)                          | Federal PSD Permit condition #26117, part 26b | C                            | CEM                        | X          |    |       |
| CO            | BAAQMD condition #23763, part 51b             | Y      |                       | 114,000 lbs. from commissioning activities for black start capability  | BAAQMD condition #23763, part 52              | P/E                          | CEM, records, calculations | NA         |    |       |
| CO            | Federal PSD Permit condition #26117, part 63b | Y      |                       | 114,000 lbs. from commissioning activities for black start capability  | Federal PSD Permit condition #26117, part 64  | P/E                          | CEM, records, calculations | NA         |    |       |
| CO            | BAAQMD condition #23763, part 53b             | Y      |                       | 131,100 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | BAAQMD condition #23763, part 26              | P/E                          | CEM, records, calculations | NA         |    |       |



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|-----------------|---|--------|-----------------------|--|--|------------------------------|---|------------|----|-------|
|                 |   |        |                       |  |  |                              |   | Yes        | No |       |
| CO              | Federal PSD Permit condition #26117, part 65b | Y      |                       | 131,100 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | Federal PSD Permit condition #26117, part 26 | P/E                          | CEM, records, calculations                        | NA         |    |       |
| CO              | BAAQMD condition #23763, part 54b             | Y      |                       | 137,100 lbs. for both turbines combined during a black start emergency event   | BAAQMD condition #23763, part 26             | P/E                          | CEM, records, calculations                        | NA         |    |       |
| CO              | Federal PSD Permit condition #26117, part 66b | Y      |                       | 137,100 lbs. for both turbines combined during a black start emergency event   | Federal PSD Permit condition #26117, part 26 | P/E                          | CEM, records, calculations                        | NA         |    |       |
| CO <sub>2</sub> |   | Y      |                       | None   | 40 CFR 75.10                                 | C                            | fuel flow monitor and CO <sub>2</sub> calculation | X          |    |       |
| SO <sub>2</sub> | 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                            |   | X          |    |       |
| SO <sub>2</sub> | BAAQMD 9-1-302                                | Y      |                       | 300 ppm (dry)  |  | N                            |   | X          |    |       |
| SO <sub>2</sub> | 40 CFR 60 Subpart KKKK 60.443(a)(2)           | Y      |                       | 0.060 lb/MMBtu   | 40 CFR 60 Subpart KKKK 60.4365(a)            | P                            | Natural gas sulfur content certification          | X          |    |       |

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|-----------------|-----------------------------------|--------|-----------------------|---|---|------------------------------|---------------------------------|------------|----|-------|
|                 |                                   |        |                       |   |   |                              |                                 | Yes        | No |       |
| SO <sub>2</sub> |                                   | Y      |                       | None  | 40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3 |                              | Fuel measurements, calculations | X          |    |       |
| SO <sub>2</sub> | BAAQMD condition #23763, part 19g | Y      |                       | 6.21 lb/hr, for turbine and HRSG combined   | BAAQMD condition #23763, part 30              | P/A                          | Source test at maximum load     | X          |    |       |
| SO <sub>2</sub> | BAAQMD condition #23763, part 19g | Y      |                       | 0.00128 lb/MM BTU, for turbine and HRSG combined  | BAAQMD condition #23763, part 30              | P/A                          | Source test at maximum load     | X          |    |       |
| SO <sub>2</sub> | BAAQMD condition #23763, part 22f | Y      |                       | 292 lb/day for turbines, HRSGs, and fire pump diesel engine combined  | BAAQMD condition #23763, part 27              | P/D                          | Records, calculations           | X          |    |       |
| SO <sub>2</sub> | BAAQMD condition #23763, part 23e | Y      |                       | 12.2 ton/yr for turbines, HRSGs, and diesel fire pump combined (includes emissions from commissioning period) | BAAQMD condition #23763, part 27              | P/D                          | Records, calculations           | X          |    |       |
| SO <sub>2</sub> | BAAQMD condition #23763, part 51e | Y      |                       | 124 lbs. from commissioning activities for black start capability   | BAAQMD condition #23763, part 52              | P/E                          | Records, calculations           | NA         |    |       |

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|------------------|-----------------------------------|--------|-----------------------|--|----------------------------------|------------------------------|-----------------------------|------------|----|-------|
|                  |                                   |        |                       |  |                                  |                              |                             | Yes        | No |       |
| SO <sub>2</sub>  | BAAQMD condition #23763, part 53e | Y      |                       | 292 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | BAAQMD condition #23763, part 27 | P/E                          | Records, calculations       | NA         |    |       |
| SO <sub>2</sub>  | BAAQMD condition #23763, part 54e | Y      |                       | 298 lbs. for both turbines combined during a black start emergency event   | BAAQMD condition #23763, part 27 | P/E                          | Records, calculations       | NA         |    |       |
| 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          |    |       |
| FP               | BAAQMD 6-1-310                    | N      |                       | 0.15 grain/dscf  |                                  | N                            |                             | X          |    |       |
| FP               | SIP 6-310                         | Y      |                       | 0.15 grain/dscf  |                                  | N                            |                             | X          |    |       |
| FP               | BAAQMD 6-1-310.3                  | N      |                       | 0.15 grain/dscf @ 6% O <sub>2</sub>  |                                  | N                            |                             | X          |    |       |
|                  | SIP 6-310.3                       | Y      |                       | 0.15 grain/dscf @ 6% O <sub>2</sub>  |                                  | N                            |                             | X          |    |       |
| PM <sub>10</sub> | BAAQMD condition #23763, part 19h | Y      |                       | 7.5 lb/hr, for each turbine and HRSG combined  | BAAQMD condition #23763, part 30 | P/A                          | Source test at maximum load | X          |    |       |

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|------------------|---|--------|-----------------------|--|--|------------------------------|-----------------------------|------------|----|-------|
|                  |   |        |                       |  |  |                              |                             | Yes        | No |       |
| PM <sub>10</sub> | BAAQMD condition #23763, part 19h             | Y      |                       | 0.0036 lb/MMBTU, for each turbine and HRSG combined  | BAAQMD condition #23763, part 30             | P/A                          | Source test at maximum load | X          |    |       |
| PM <sub>10</sub> | Federal PSD Permit condition #26117, part 19h | Y      |                       | 7.5 lb/hr, for each turbine and HRSG combined  | Federal PSD Permit condition #26117, part 30 | P/A                          | Source test at maximum load | X          |    |       |
| PM <sub>10</sub> | Federal PSD Permit condition #26117, part 19h | Y      |                       | 0.0036 lb/MMBTU, for each turbine and HRSG combined  | Federal PSD Permit condition #26117, part 30 | P/A                          | Source test at maximum load | X          |    |       |
| PM <sub>10</sub> | BAAQMD condition #23763, part 22e             | Y      |                       | 413 lb/day for turbines, HRSGs, and fire pump diesel engine combined   | BAAQMD condition #23763, part 27             | P/D                          | Records, calculations       | X          |    |       |
| PM <sub>10</sub> | Federal PSD Permit condition #26117, part 22e | Y      |                       | 413 lb/day for turbines, HRSGs, and fire pump diesel engine combined   | Federal PSD Permit condition #26117, part 27 | P/D                          | Records, calculations       | X          |    |       |
| PM <sub>10</sub> | BAAQMD condition #23763, part 23d             | Y      |                       | 71.8 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period) | BAAQMD condition #23763, part 27             | P/D                          | Records, calculations       | X          |    |       |

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|------------------|---|--------|-----------------------|--|--|------------------------------|-----------------------|------------|----|-------|
|                  |   |        |                       |  |  |                              |                       | Yes        | No |       |
| PM <sub>10</sub> | Federal PSD Permit condition #26117, part 23d | Y      |                       | 71.8 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)                     | Federal PSD Permit condition #26117, part 27 | P/D                          | Records, calculations | X          |    |       |
| PM <sub>10</sub> | BAAQMD condition #23763, part 51d             | Y      |                       | 150 lbs. from commissioning activities for black start capability  | BAAQMD condition #23763, part 52             | P/E                          | Records, calculations | NA         |    |       |
| PM <sub>10</sub> | Federal PSD Permit condition #26117, part 63d | Y      |                       | 150 lbs. from commissioning activities for black start capability  | Federal PSD Permit condition #26117, part 27 | P/E                          | Records, calculations | NA         |    |       |
| PM <sub>10</sub> | BAAQMD condition #23763, part 53d             | Y      |                       | 360 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | BAAQMD condition #23763, part 64             | P/E                          | Records, calculations | NA         |    |       |
| PM <sub>10</sub> | Federal PSD Permit condition #26117, part 65d | Y      |                       | 360 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | Federal PSD Permit condition #26117, part 27 | P/E                          | Records, calculations | NA         |    |       |

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|------------------|---|--------|-----------------------|--|--|------------------------------|-----------------------------|------------|----|-------|
|                  |   |        |                       |  |  |                              |                             | Yes        | No |       |
| PM <sub>10</sub> | BAAQMD condition #23763, part 54d             | Y      |                       | 360 lbs. for both turbines combined during a black start emergency event   | BAAQMD condition #23763, part 27             | P/E                          | Records, calculations       | NA         |    |       |
| PM <sub>10</sub> | Federal PSD Permit condition #26117, part 66d | Y      |                       | 360 lbs. for both turbines combined during a black start emergency event   | Federal PSD Permit condition #26117, part 27 | P/E                          | Records, calculations       | NA         |    |       |
| POC              | BAAQMD condition #23763, part 19f             | Y      |                       | 2.86 lb/hr (as CH <sub>4</sub> ) for each turbine and HRSG combined except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations.         | BAAQMD condition #23763, part 30             | P/A                          | Source test at maximum load | X          |    |       |
| POC              | BAAQMD condition #23763, part 19f             | Y      |                       | 0.00128 lb/MM BTU (as CH <sub>4</sub> ) for each turbine, and HRSG combined except during turbine startup, shutdown, combustor tuning operation, commissioning activities for black start capability, or black start emergency operations. | BAAQMD condition #23763, part 30             | P/A                          | Source test at maximum load | X          |    |       |

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|---------------|-----------------------------------|--------|-----------------------|--|----------------------------------|------------------------------|-----------------------|------------|----|-------|
|               |                                   |        |                       |  |                                  |                              |                       | Yes        | No |       |
| POC           | BAAQMD condition #23763, part 20  | Y      |                       | 35.3 lb/turbine during hot start-up  | BAAQMD condition #23763, part 27 | P/D                          | Records, calculations | X          |    |       |
| POC           | BAAQMD condition #23763, part 20  | Y      |                       | 79 lb/turbine during warm start-up   | BAAQMD condition #23763, part 27 | P/D                          | Records, calculations | X          |    |       |
| POC           | BAAQMD condition #23763, part 20  | Y      |                       | 16 lb/turbine during shutdown  | BAAQMD condition #23763, part 27 | P/D                          | Records, calculations | X          |    |       |
| POC           | BAAQMD condition #23763, part 20  | Y      |                       | 83 lb/turbine during cold start-up or combustor tuning operation   | BAAQMD condition #23763, part 27 | P/D                          | Records, calculations | X          |    |       |
| POC           | BAAQMD condition #23763, part 22d | Y      |                       | 295 lb/day (as CH4) for turbines and HRSGs combined  | BAAQMD condition #23763, part 27 | P/D                          | Records, calculations | X          |    |       |
| POC           | BAAQMD condition #23763, part 23c | Y      |                       | 28.5 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period) | BAAQMD condition #23763, part 27 | P/D                          | Records, calculations | X          |    |       |

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|-----------------|-----------------------------------|--------|-----------------------|--|--|------------------------------|--|------------|----|-------|
|                 |                                   |        |                       |  |  |                              |  | Yes        | No |       |
| POC             | BAAQMD condition #23763, part 51c | Y      |                       | 6,080 lbs/ from commissioning activities for black start capability  | BAAQMD condition #23763, part 52           | P/E                          | Records, calculations  | NA         |    |       |
| POC             | BAAQMD condition #23763, part 53c | Y      |                       | 7,300 lb/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | BAAQMD condition #23763, part 27           | P/E                          | Records, calculations  | NA         |    |       |
| POC             | BAAQMD condition #23763, part 54c | Y      |                       | 14,600 lbs. for both turbines combined during a black start emergency event  | BAAQMD condition #23763, part 27           | P/E                          | Records, calculations  | NA         |    |       |
| NH <sub>3</sub> | BAAQMD condition #23763, Part 19e | N      |                       | 5 ppmv, dry, @ 15% O <sub>2</sub> , averaged over 3 hrs for each turbine and HRSG combined except during turbine startup or shutdown       | BAAQMD condition #23763, part 26c, part 29 | C                            | Ammonia injection rate monitor, calculations, and annual source test | X          |    |       |
| Formaldehyde    | BAAQMD condition #23763, part 25  | N      |                       | 10,912 lb/yr for turbines and HRSGs combined   | BAAQMD condition #23763, part 28           | P/D                          | Records, calculations  | X          |    |       |



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|------------------|----------------------------------|--------|-----------------------|--|-----------------------------------|---------------------------------|--------------------------|------------|----|-------|
|                  |                                  |        |                       |  |                                   |                                 |                          | Yes        | No |       |
| Formaldehyde     | BAAQMD condition #23763, part 25 | N      |                       | 10,912 lb/yr for turbines and HRSGs combined                       | BAAQMD condition #23763, part 32  | P/every two years on P-1 or P-2 | Source test              | X          |    |       |
| Benzene          | BAAQMD condition #23763, part 25 | N      |                       | 226 lb/yr for turbines and HRSGs combined                          | BAAQMD condition #23763, part 28  | P/D                             | Records, calculations    | X          |    |       |
| Benzene          | BAAQMD condition #23763, part 25 | N      |                       | 226 lb/yr for turbines and HRSGs combined                          | BAAQMD condition #23763, part 32  | P/every two years on P-1 or P-2 | Source test              | X          |    |       |
| Specified PAHs   | BAAQMD condition #23763, part 25 | N      |                       | 1.8 lb/yr for turbines and HRSGs combined                          | BAAQMD condition #23763, part 28  | P/D                             | Records, calculations    | X          |    |       |
| Specified PAHs   | BAAQMD condition #23763, part 25 | N      |                       | 1.8 lb/yr for turbines and HRSGs combined                          | BAAQMD condition #23763, part 32  | P/every two years on P-1 or P-2 | Source test              | X          |    |       |
| Heat Input limit | BAAQMD condition #23763, part 13 | Y      |                       | 2,238.6 MM BTU/hour, 3-hr average for each Turbine and HRSG, total | BAAQMD condition #23763, part 26a | C                               | Fuel meter, calculations | X          |    |       |

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|-------------------|--|--------|-----------------------|--|---|------------------------------|--------------------------|------------|----|-------|
|                   |  |        |                       |  |   |                              |                          | Yes        | No |       |
| Heat Input limit  | Federal PSD Permit condition #26117, part 13 | Y      |                       | 2,238.6 MM BTU/hour, 3-hr average for each Turbine and HRSG, total         | Federal PSD Permit condition #26117, part 26a | C                            | Fuel meter, calculations | X          |    |       |
| Heat Input Limit  | BAAQMD condition #23763, part 14             | Y      |                       | 53,726 MM BTU/calendar day, for each Turbine and HRSG, total               | BAAQMD condition #23763, part 26a             | C                            | fuel meter, calculations | X          |    |       |
| Heat Input Limit  | Federal PSD Permit condition #26117, part 14 | Y      |                       | 53,726 MM BTU/calendar day, for each Turbine and HRSG, total               | Federal PSD Permit condition #26117, part 26a | C                            | fuel meter, calculations | X          |    |       |
| Heat Input Limit  | BAAQMD condition #23763, part 15             | Y      |                       | 35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined | BAAQMD condition #23763, part 26a             | C                            | fuel meter, calculations | X          |    |       |
| Heat Input Limit  | Federal PSD Permit condition #26117, part 15 | Y      |                       | 35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined | Federal PSD Permit condition #26117, part 26a | C                            | fuel meter, calculations | X          |    |       |
| CO <sub>2</sub> E | Federal PSD Permit condition #26117, part 50 | Y      |                       | 242 metric tons per hour for gas turbines and HRSGs, combined              | Federal PSD Permit condition #26117, part 15  | P/M                          | Fuel meter, calculations | X          |    |       |

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|-------------------|---|--------|-----------------------|---|--|------------------------------|--------------------------|------------|----|-------|
|                   |   |        |                       |   |  |                              |                          | Yes        | No |       |
| CO <sub>2</sub> E | Federal PSD Permit condition #26117, part 51  | Y      |                       | 5,802 metric tons per day for gas turbines and HRSGs, combined  | Federal PSD Permit condition #26117, part 54 | P/M                          | Fuel meter, calculations | X          |    |       |
| CO <sub>2</sub> E | Federal PSD Permit condition #26117, part 52  | Y      |                       | 1,928,182 metric tons per year for gas turbines and HRSGs, combined   | Federal PSD Permit condition #26117, part 54 | P/M                          | Fuel meter, calculations | X          |    |       |
| CO <sub>2</sub> E | BAAQMD condition #23763, part 51f             | Y      |                       | 3,298,700 lbs. CO <sub>2</sub> E from commissioning activities for black start capability   | BAAQMD condition #23763, part 52             | P/E                          | Records, calculations    | NA         |    |       |
| CO <sub>2</sub> E | Federal PSD Permit condition #26117, part 63f | Y      |                       | 3,298,700 lbs. CO <sub>2</sub> E from commissioning activities for black start capability   | Federal PSD Permit condition #26117, part 64 | P/E                          | Records, calculations    | NA         |    |       |
| CO <sub>2</sub> E | BAAQMD condition #23763, part 53f             | Y      |                       | 12,786,900 lb CO <sub>2</sub> E/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | BAAQMD condition #23763, part 26             | P/E                          | Records, calculations    | NA         |    |       |

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|---|---|--------|-----------------------|---|--|------------------------------|-----------------------|------------|----|-------|
|   |   |        |                       |   |  |                              |                       | Yes        | No |       |
| CO <sub>2</sub> E                                   | Federal PSD Permit condition #26117, part 65f | Y      |                       | 12,786,900 lb CO <sub>2</sub> E/day for both turbines combined when commissioning activities for black start capability or black start emergency operations occur | Federal PSD Permit condition #26117, part 54 | P/E                          | Records, calculations | NA         |    |       |
| CO <sub>2</sub> E                                   | BAAQMD condition #23763, part 54f             | Y      |                       | 11,644,500 lbs. CO <sub>2</sub> E for both turbines combined during a black start emergency event   | BAAQMD condition #23763, part 26             | P/E                          | Records, calculations | NA         |    |       |
| CO <sub>2</sub> E                                   | Federal PSD Permit condition #26117, part 66f | Y      |                       | 11,644,500 lbs. CO <sub>2</sub> E for both turbines combined during a black start emergency event   | Federal PSD Permit condition #26117, part 54 | P/E                          | Records, calculations | NA         |    |       |
| Heat Rate Limit                                     | Federal PSD Permit condition #26117, part 53  | Y      |                       | 7,730 BTU/KW-hr for each gas turbine  | Federal PSD Permit condition #26117, part 55 | P/A                          | Source Test           | X          |    |       |
| Commissioning Activities for Black Start Capability | BAAQMD condition #23763, part 50              | Y      |                       | 20 hours for both gas turbines combined.  | BAAQMD condition #23763, part 52             | P/E                          | Records, calculations | NA         |    |       |

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|---|--|--------|-----------------------|--|--|------------------------------|-----------------------|------------|----|-------|
|   |  |        |                       |  |  |                              |                       | Yes        | No |       |
| Commissioning Activities for Black Start Capability | Federal PSD Permit condition #26117, part 62 | Y      |                       | 20 hours for both gas turbines combined. | Federal PSD Permit condition #26117, part 64 | P/E                          | Records, calculations | NA         |    |       |

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**Table VII – B  
 Applicable Limits and Compliance Monitoring Requirements  
 S-5, 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 |   |
|------------------------|--|--------|-----------------------|---|--|------------------------------|-------------------------------------|------------|---|
|                        |  |        |                       |   |  |                              |                                     | Y          | N |
| Opacity                | BAAQMD 6-1-303.1                             | N      |                       | ≥ 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                |  | N                            |                                     | X          |   |
| FP                     | BAAQMD 6-1-310                               | N      |                       | 0.15 grain/dscf   |  | N                            |                                     | X          |   |
| FP                     | SIP Regulation 6-310                         | Y      |                       | 0.15 gr/dscf  |  | N                            |                                     | X          |   |
| Total Dissolved Solids | BAAQMD Condition #23763, part 44             | Y      |                       | 6,200 ppmw (mg/l)   | BAAQMD Condition #23763, part 44             | P/D                          | Sample and test cooling tower water | X          |   |
| Total Dissolved Solids | Federal PSD Permit Condition #26117, part 44 | Y      |                       | 6,200 ppmw (mg/l)   | Federal PSD Permit Condition #26117, part 44 | P/D                          | Sample and test cooling tower water | X          |   |

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**Table VII – C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-6, 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 |   |
|---------------------------|------------------------|--------|-----------------------|--|---|------------------------------|----------------------------------|------------|---|
|                           |                        |        |                       |  |   |                              |                                  | Y          | N |
| Opacity                   | BAAQMD 6-1-303.1       | N      |                       | ≥ 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   |   | N                            |                                  | X          |   |
| FP                        | BAAQMD 6-1-310         | N      |                       | 0.15 grain/dscf  |   | N                            |                                  | X          |   |
| FP                        | SIP Regulation 6-310   | Y      |                       | 0.15 gr/dscf   |   | N                            |                                  | X          |   |
| SO <sub>2</sub>           | BAAQMD 9-1-301         | Y      |                       | Property Line Ground Level Limits:<br>≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours | None                                    | N                            | N/A                              | X          |   |
| SO <sub>2</sub>           | BAAQMD 9-1-304         | Y      |                       | Fuel Sulfur Limit 0.5%   | BAAQMD Condition # 20498, Parts 5 and 8 | P/E                          | Vendor Certification             | X          |   |
| Reliability Related Hours | BAAQMD 9-8-330         | N      |                       | 50 hours   | 9-8-502                                 | P/E                          | Totalizing meter, Record-keeping | X          |   |

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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 |   |
|-----------------------------------|---|--------|-----------------------|--|---|------------------------------|----------------------------------|------------|---|
|                                   |   |        |                       |  |   |                              |                                  | Y          | N |
| Hours for maintenance and testing | Title 17, California Code of Regulations section 93115.6(a) (4) | N      |                       | Not operate more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 – “Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems,” 2002 edition | 93115.10(d)                                       | P/E                          | Totalizing meter. Record-keeping | X          |   |
| Reliability-related activities    | BAAQMD Condition #23763, part 46                                | N      |                       | 50 hours per calendar year   | BAAQMD Condition #23763, parts 48, 49             | P/E                          | Totalizing meter, record-keeping | X          |   |
| Reliability-related activities    | Federal PSD Permit Condition #26117, part 46                    | N      |                       | 50 hours per calendar year   | Federal PSD Permit Condition #26117, parts 48, 49 | P/E                          | Totalizing meter, record-keeping | X          |   |
| CO <sub>2</sub> E                 | Federal PSD Permit Condition #26117, part 56                    | Y      |                       | 7.6 metric tons per rolling 12-month period  | Federal PSD Permit Condition #26117, part 58      | P/E                          | Totalizing meter, record-keeping | X          |   |



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**Table VII – D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-7, S-8, S-9, S-10, & S-11 CIRCUIT BREAKERS**

| Type of Limit     | Citation of Limit                            | FE Y/N | Future Effective Date | Limit   | Monitoring Requirement Citation              | Monitoring Frequency (P/C/N) | Monitoring Type              | Compliance |   | Notes |
|-------------------|--|--------|-----------------------|---|--|------------------------------|------------------------------|------------|---|-------|
|                   |  |        |                       |   |  |                              |                              | Y          | N |       |
| CO <sub>2</sub> E | Federal PSD Permit Condition #26117, part 59 | Y      |                       | 39.3 metric tons per rolling 12- month period from S-7 through S-11, combined | Federal PSD Permit Condition #26117, part 60 | P                            | Record-keeping, calculations | X          |   |       |