

Title V Semi- Annual Monitoring Verification Report

Applicable Limits and Compliance Monitoring

This report summarizes the applicable source – specific emission limits for the Cogeneration Plant, facility #A0621. The following table shows the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. Also, for periodic monitoring, the frequency of the monitoring is shown: annual (A), quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) is required if the current applicable rule or regulation does not require monitoring – where our facility's operation will not deviate from the applicable emission limit based upon the nature of its operation. The last two columns indicate our facility's compliance from September 1, 2011 through February 29, 2012.

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

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
PM	BAAQMD Regulation 6-301	Y		Ringelmann 1.0		N		Yes (1)
	BAAQMD Regulation 6-301	Y		0.15 g/dscf @ 8% O ₂		N		Yes (1)
NOx	BAAQMD 9-9-301.1	Y		42 ppmv @15% O ₂	Condition #14194, Part 9	P/A	Source Test	Yes (1)
	NSPS Subpart GG 60.332 (a)(2)	Y		141 ppmv @15% O ₂	NSPS Subpart GG 60.334(a)	C	Water-to-fuel ratio	Yes (1)
	Condition #14194, part 4	Y		42 ppmv @15% O ₂ (dry), each turbine (except during startup and shutdown)	Condition #14194, Part 9	P/A	Source Test	No (1)

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

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
NOX	Condition #14194, part 5	Y		42 ppmv @ 15% O ₂ (dry), each turbine supplemental burner combination	Condition #14194, part 5	P/A	Source Test	Yes
SO ₂	BAAQMD 9-1-301	Y		Ground level concentrations: 0.5ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours		N		Yes (1)
	BAAQMD 9-1-302	Y		300 ppm (dry) general emission limitation		N		Yes (1)
	40 CFR 60 Subpart GG 60.333 (b)	Y		0.8% (wt) fuel sulfur content	Monitoring requirement subsumed by BAAQMD condition #14194, part 1. See Permit Shield	N		Yes (1)
Fuel Usage	BAAQMD Condition #14194 part 2	Y		55.1 MMBTU/hr heat input (each turbine)	BAAQMD Condition #14194 part 7	C	Continuous Fuel Usage Monitors	Yes
Water-to-Fuel Ratio	BAAQMD Condition #14194 part 6	Y		Water-to-Fuel Ratio: 57% to 62% (wt)	BAAQMD Condition #14194 part 7	C	Continuous Water-to-Fuel Ratio	No

**(Adapted from Table VII-B of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
S3, S4-Duct Burner**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
PM	BAAQMD Regulation 6-301	Y		Ringelmann 1.0		N		Yes (1)
	BAAQMD Regulation 6-310.3	Y		0.15 gr/dscf @ 6% O ₂		N		Yes (1)
NOx	Condition #14194, part 5	Y		42 ppmv @ 15% O ₂ (dry), each turbine/supplemental burner combination	Condition #14194, part 9	P/A	Source Test	Yes
SO ₂	BAAQMD Regulation 9-1-301	Y		Ground Level Concentrations. 0.5 ppm for 3 consecutive minutes. 0.25 ppm averaged over 60 consecutive minutes. 0.05 ppm averaged over 24 hours		N		Yes (1)
	BAAQMD Regulation 9-1-302	Y		300 ppm (dry) general emission limitation		N		Yes (1)
Fuel Usage	BAAQMD Condition #14194 part 3	Y		13.5 MMBTU/hr heat input (each duct burner)	BAAQMD condition #14194 part 7	C	Continuous Fuel Usage Monitors	Yes

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