



BAY AREA
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MANAGEMENT
DISTRICT
SINCE 1955

October 26, 2011

Barbara McBride
Russell City Energy Company, LLC
717 Texas Avenue, Suite 1000
Houston, TX 77002

Application Number 15487
Plant Number: 18136
Equipment Location:

3862 Depot Road, near the corner of Depot
Road and Cabot Boulevard, in the City of
Hayward, Alameda County, California

Dear Ms. McBride:

SUBJECT: AUTHORITY TO CONSTRUCT RENEWAL

In accordance with Regulation 2-1-407, an Authority to Construct is valid for two years from the date of issuance and may be renewed for additional two-year terms. The Authority to Construct (ATC) issued to you on November 1, 2007 for the following equipment:

- S-1 Combustion Turbine Generator (CTG) #1, Westinghouse 501F, 2,038.6 MMBtu/hr maximum rated capacity, natural gas fired only; abated by A-1 Selective Catalytic Reduction System (SCR) and A-2 Oxidation Catalyst
- S-2 Heat Recovery Steam Generator (HRSG) #1, with Duct Burner Supplemental Firing System, 200 MMBtu/hr maximum rated capacity; Abated by A-1 Selective Catalytic Reduction (SCR) System and A-2 Oxidation Catalyst
- S-3 Combustion Turbine Generator (CTG) #2, Westinghouse 501F, 2,038.6 MMBtu/hr maximum rated capacity, natural gas fired only; abated by A-3 Selective Catalytic Reduction System (SCR) and A-4 Oxidation Catalyst
- S-4 Heat Recovery Steam Generator (HRSG) #2, with Duct Burner Supplemental Firing System, 200 MMBtu/hr maximum rated capacity; Abated by A-3 Selective Catalytic Reduction (SCR) System and A-4 Oxidation Catalyst
- S-5 Cooling Tower, 9-Cell, 141,352 gallons per minute
- S-6 Fire Pump Diesel Engine, Clarke JW6H-UF40, 300 hp, 2.02 MMBtu/hr rated heat input.

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was renewed for two additional years on November 18, 2010 with an expiration date of October 31, 2011, upon demonstrating that the project complied with current BACT and offset requirements pursuant to District Regulations 2-2-301, 302, and 30. Substantial use of the ATC has been demonstrated by construction of the facility, which began on September 10, 2010, beyond the grading and foundation stage. In addition, several contracts for this project were signed during the term of the ATC. Calpine has also paid the requisite fees for the renewal. In accordance with Regulation 2-1-407.3, the Authority to Construct will be renewed for an additional two year term, and will now expire on October 31, 2013.

Please include your application number with any correspondence with the District. The District's regulations may be viewed online at www.baaqmd.gov. If you have any questions on this matter, please call **Weyman Lee, Senior Air Quality Engineer**, at (415) 749-4796.

Very truly yours,



Barry G. Young
Manager, Permit Evaluation Section
Engineering Division

BGY:wl

Attachment: Permit Condition No. 23763



Russell City Energy Center Permit Conditions

(A) Definitions:

Clock Hour:	Any continuous 60-minute period beginning on the hour
Calendar Day:	Any continuous 24-hour period beginning at 12:00 AM or 0000 hours
Year:	Any consecutive twelve-month period of time
Heat Input:	Heat inputs refer to the heat input at the higher heating value (HHV) of the fuel, in BTU/scf
Firing Hours:	Period of time during which fuel is flowing to a unit, measured in minutes
MM BTU:	Million British thermal units
Gas Turbine Warm and Hot Start-up Mode:	The lesser of the first 180 minutes of continuous fuel flow to the gas turbine after fuel flow is initiated or the period of time from gas turbine fuel flow initiation until the gas turbine achieves two consecutive CEM data points in compliance with the emission concentration limits of conditions 19(b) and 19(d)
Gas Turbine Cold Start-up Mode:	The lesser of the first 360 minutes of continuous fuel flow to the gas turbine after fuel flow is initiated or the period of time from gas turbine fuel flow initiation until the gas turbine achieves two consecutive CEM data points in compliance with the emission concentration limits of conditions 19(b) and 19(d)
Gas Turbine Shutdown Mode:	The lesser of the 30 minute period immediately prior to the termination of fuel flow to the gas turbine or the period of time from non-compliance with any requirement listed in Conditions 19(b) through 19(d) until termination of fuel flow to the gas turbine
Gas Turbine Combustor Tuning Mode:	The period of time, not to exceed 360 minutes, in which testing, adjustment, tuning, and calibration operations are performed, as recommended by the gas turbine manufacturer, to insure safe and reliable steady-state operation, and to minimize NO _x and CO emissions. The SCR and oxidation catalyst are not operating during the tuning operation.
Gas Turbine Cold Start-up:	A gas turbine start-up that occurs more than 48 hours after a gas turbine shutdown
Gas Turbine Hot Start-up:	A gas turbine start-up that occurs within 8 hours of a gas turbine shutdown



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Gas Turbine Warm Start-up:	A gas turbine start-up that occurs between 8 hours and 48 hours of a gas turbine shutdown
Specified PAHs:	<p>The polycyclic aromatic hydrocarbons listed below shall be considered to be Specified PAHs for these permit conditions. Any emission limits for Specified PAHs refer to the sum of the emissions for all six of the following compounds</p> <p>Benzo[a]anthracene Benzo[b]fluoranthene Benzo[k]fluoranthene Benzo[a]pyrene Dibenzo[a,h]anthracene Indeno[1,2,3-cd]pyrene</p>
Corrected Concentration:	The concentration of any pollutant (generally NO _x , CO, or NH ₃) corrected to a standard stack gas oxygen concentration. For emission points P-1 (combined exhaust of S-1 gas turbine and S-3 HRSG duct burners), P-2 (combined exhaust of S-2 gas turbine and S-4 HRSG duct burners), the standard stack gas oxygen concentration is 15% O ₂ by volume on a dry basis
Commissioning Activities:	All testing, adjustment, tuning, and calibration activities recommended by the equipment manufacturers and the RCEC construction contractor to insure safe and reliable steady state operation of the gas turbines, heat recovery steam generators, steam turbine, and associated electrical delivery systems during the commissioning period
Commissioning Period:	The Period shall commence when all mechanical, electrical, and control systems are installed and individual system start-up has been completed, or when a gas turbine is first fired, whichever occurs first. The period shall terminate when the plant has completed performance testing, is available for commercial operation, and has initiated sales to the power exchange.
Precursor Organic Compounds (POCs):	Any compound of carbon, excluding methane, ethane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate
CPM:	California Energy Commission Compliance Program Manager
RCEC:	Russell City Energy Center

(B) Applicability:

Conditions 1 through 11 shall only apply during the commissioning period as defined above. Unless otherwise indicated, **Conditions 12 through 49** shall apply after the commissioning period has ended.

Conditions for the Commissioning Period



1. The owner/operator of the RCEC shall minimize emissions of carbon monoxide and nitrogen oxides from S-1 & S-3 gas turbines and S-2 & S-4 Heat Recovery Steam Generators (HRSGs) to the maximum extent possible during the commissioning period.
2. At the earliest feasible opportunity in accordance with the recommendations of the equipment manufacturers and the construction contractor, the owner/operator shall tune the S-1 & S-3 gas turbines combustors and S-2 & S-4 HRSG duct burners to minimize the emissions of carbon monoxide and nitrogen oxides.
3. At the earliest feasible opportunity in accordance with the recommendations of the equipment manufacturers and the construction contractor, owner/operator shall install, adjust, and operate the A-2 & A-4 Oxidation Catalysts and A-1 & A-3 SCR Systems to minimize the emissions of carbon monoxide and nitrogen oxides from S-1 & S-3 gas turbines and S-2 & S-4 HRSGs.
4. The owner/operator of the RCEC shall submit a plan to the District Engineering Division and the CEC CPM at least four weeks prior to first firing of S-1 & S-3 gas turbines describing the procedures to be followed during the commissioning of the gas turbines, HRSGs, and steam turbines. The plan shall include a description of each commissioning activity, the anticipated duration of each activity in hours, and the purpose of the activity. The activities described shall include, but not be limited to, the tuning of the Dry-Low-NO_x combustors, the installation and operation of the required emission control systems, the installation, calibration, and testing of the CO and NO_x continuous emission monitors, and any activities requiring the firing of the gas turbines (S-1 & S-3) and HRSGs (S-2 & S-4) without abatement by their respective oxidation catalysts and/or SCR Systems. The owner/operator shall not fire any of the gas turbines (S-1 or S-3) sooner than 28 days after the District receives the commissioning plan.
5. During the commissioning period, the owner/operator of the RCEC shall demonstrate compliance with **conditions 7, 8, 9, and 10** through the use of properly operated and maintained continuous emission monitors and data recorders for the following parameters:
 - firing hours
 - fuel flow rates
 - stack gas nitrogen oxide emission concentrations,
 - stack gas carbon monoxide emission concentrations
 - stack gas oxygen concentrations.The monitored parameters shall be recorded at least once every 15 minutes (excluding normal calibration periods or when the monitored source is not in operation) for the gas turbines (S-1 & S-3), HRSGs (S-2 & S-4). The owner/operator shall use District-approved methods to calculate heat input rates, nitrogen dioxide mass emission rates, carbon monoxide mass emission rates, and NO_x and CO emission concentrations, summarized for each clock hour and each calendar day. The owner/operator shall retain records on site for at least 5 years from the date of entry and make such records available to District personnel upon request.
6. The owner/operator shall install, calibrate, and operate the District-approved continuous monitors specified in **condition 5** prior to first firing of the gas turbines (S-1 & S-3) and HRSGs (S-2 & S-4). After first firing of the turbines, the owner/operator shall adjust the



detection range of these continuous emission monitors as necessary to accurately measure the resulting range of CO and NO_x emission concentrations. The type, specifications, and location of these monitors shall be subject to District review and approval.

7. The owner/operator shall not fire the S-1 gas turbine and S-2 HRSG without abatement of nitrogen oxide emissions by A-1 SCR System and/or abatement of carbon monoxide emissions by A-2 Oxidation Catalyst for more than 300 hours during the commissioning period. Such operation of S-1 gas turbine and S-2 HRSG without abatement shall be limited to discrete commissioning activities that can only be properly executed without the SCR system and/or oxidation catalyst in place. Upon completion of these activities, the owner/operator shall provide written notice to the District Engineering and Enforcement Divisions and the unused balance of the 300 firing hours without abatement shall expire.
8. The owner/operator shall not fire the S-3 gas turbine and S-4 HRSG without abatement of nitrogen oxide emissions by A-3 SCR System and/or abatement of carbon monoxide emissions by A-4 Oxidation Catalyst for more than 300 hours during the commissioning period. Such operation of S-3 gas turbine and S-4 HRSG without abatement shall be limited to discrete commissioning activities that can only be properly executed without the SCR system and/or oxidation catalyst in place. Upon completion of these activities, the owner/operator shall provide written notice to the District Engineering and Enforcement Divisions and the unused balance of the 300 firing hours without abatement shall expire.
9. The total mass emissions of nitrogen oxides, carbon monoxide, precursor organic compounds, PM₁₀, and sulfur dioxide that are emitted by the gas turbines (S-1 & S-3), HRSGs (S-2 & S-4) and S-6 Fire Pump Diesel Engine during the commissioning period shall accrue towards the consecutive twelve-month emission limitations specified in **condition 23**.
10. The project owner shall not operate the gas turbines (S-1 & S-3) and HRSGs (S-2 & S-4) in a manner such that the combined pollutant emissions from these sources will exceed the following limits during the commissioning period. These emission limits shall include emissions resulting from the start-up and shutdown of the gas turbines (S-1 & S-3).

NO _x (as NO ₂)	4,805 pounds per calendar day	400 pounds per hour
CO	20,000 pounds per calendar day	5,000 pounds per hour
POC (as CH ₄)	495 pounds per calendar day	
PM ₁₀	413 pounds per calendar day	
SO ₂	298 pounds per calendar day	
11. No less than 90 days after startup, the Owner/Operator shall conduct District and Energy Commission approved source tests using certified continuous emissions monitors to determine compliance with the emission limitations specified in **condition 19**. The source tests shall determine NO_x, CO, and POC emissions during start-up and shutdown of the gas turbines. The POC emissions shall be analyzed for methane and ethane to account for the presence of unburned natural gas. The source test shall include a minimum of three start-up and three shutdown periods and shall include at least one cold start, one warm start, and one hot start. Twenty (20) working days before the execution of the source tests, the owner/operator shall submit to the District and the CPM a detailed source test plan designed to satisfy the requirements of this condition. The District and the CPM will notify the owner/operator of any necessary modifications to the plan within 20 working days of receipt of the plan; otherwise, the plan shall be deemed approved. The owner/operator shall incorporate the



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District and CEC CPM comments into the test plan. The owner/operator shall notify the District and the CPM within seven (7) working days prior to the planned source testing date. The owner/operator shall submit the source test results to the District and the CPM within 60 days of the source testing date.

Conditions for the Gas Turbines (S-1 & S-3) and the Heat Recovery Steam Generators (HRSGs; S-2 & S-4)

12. The owner/operator shall fire the gas turbines (S-1 & S-3) and HRSG Duct Burners (S-2 & S-4) exclusively on PUC-regulated natural gas with a maximum sulfur content of 1 grain per 100 standard cubic feet. To demonstrate compliance with this limit, the operator of S-1 through S-4 shall sample and analyze the gas from each supply source at least monthly to determine the sulfur content of the gas. PG&E monthly sulfur data may be used provided that such data can be demonstrated to be representative of the gas delivered to the RCEC. In the event that the rolling 12-month annual average sulfur content exceeds 0.25 grain per 100 standard cubic feet, a reduced annual heat input rate may be utilized to calculate the maximum projected annual emissions. The reduced annual heat input rate shall be subject to District review and approval. (BACT for SO₂ and PM₁₀)
13. The owner/operator shall not operate the units such that the combined heat input rate to each power train consisting of a gas turbine and its associated HRSG (S-1 & S-2 and S-3 & S-4) exceeds 2,238.6 MM BTU (HHV) per hour. (PSD for NO_x)
14. The owner/operator shall not operate the units such that the combined heat input rate to each power train consisting of a gas turbine and its associated HRSG (S-1 & S-2 and S-3 & S-4) exceeds 53,726 MM BTU (HHV) per day. (for PM₁₀)
15. The owner/operator shall not operate the units such that the combined cumulative heat input rate for the gas turbines (S-1 & S-3) and the HRSGs (S-2 & S-4) exceeds 35,708,858 MM BTU (HHV) per year. (Offsets)
16. The owner/operator shall not fire the HRSG duct burners (S-2 & S-4) unless its associated gas turbine (S-1 & S-3, respectively) is in operation. (BACT for NO_x)
17. The owner/operator shall ensure that the S-1 gas turbine and S-2 HRSG are abated by the properly operated and properly maintained A-1 Selective Catalytic Reduction (SCR) System and A-2 Oxidation Catalyst System whenever fuel is combusted at those sources and the A-1 SCR catalyst bed has reached minimum operating temperature. (BACT for NO_x, POC and CO)
18. The owner/operator shall ensure that the S-3 gas turbine and S-4 HRSG are abated by the properly operated and properly maintained A-3 Selective Catalytic Reduction (SCR) System and A-4 Oxidation Catalyst System whenever fuel is combusted at those sources and the A-3 SCR catalyst bed has reached minimum operating temperature. (BACT for NO_x, POC and CO)
19. The owner/operator shall ensure that the gas turbines (S-1 & S-3) and HRSGs (S-2 & S-4) comply with requirements **(a) through (h)** under all operating scenarios, including duct burner firing mode. Requirements **(a) through (h)** do not apply during a gas turbine start-up, combustor tuning operation or shutdown. (BACT, PSD, and Regulation 2, Rule 5)
 - (a) Nitrogen oxide mass emissions (calculated as NO₂) at P-1 (the combined exhaust point for S-1 gas turbine and S-2 HRSG after abatement by A-1 SCR System) shall not exceed 16.5 pounds per hour or 0.00735 lb/MM BTU (HHV) of natural gas fired. Nitrogen



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- oxide mass emissions (calculated as NO₂) at P-2 (the combined exhaust point for S-3 gas turbine and S-4 HRSG after abatement by A-3 SCR System) shall not exceed 16.5 pounds per hour or 0.00735 lb/MM BTU (HHV) of natural gas fired.
- (b) The nitrogen oxide emission concentration at emission points P-1 and P-2 each shall not exceed 2.0 ppmv, on a dry basis, corrected to 15% O₂, averaged over any 1-hour period. (BACT for NO_x)
- (c) Carbon monoxide mass emissions at P-1 and P-2 each shall not exceed 10 pounds per hour or 0.0045 lb/MM BTU of natural gas fired, averaged over any 1-hour period. (PSD for CO)
- (d) The carbon monoxide emission concentration at P-1 and P-2 each shall not exceed 2.0 ppmv, on a dry basis, corrected to 15% O₂, averaged over any 1-hour period. (BACT for CO)
- (e) Ammonia (NH₃) emission concentrations at P-1 and P-2 each shall not exceed 5 ppmv, on a dry basis, corrected to 15% O₂, averaged over any rolling 3-hour period. This ammonia emission concentration shall be verified by the continuous recording of the ammonia injection rate to A-2 and A-4 SCR Systems. The correlation between the gas turbine and HRSG heat input rates, A-2 and A-4 SCR System ammonia injection rates, and corresponding ammonia emission concentration at emission points P-1 and P-2 shall be determined in accordance with permit condition 29. (Regulation 2-5)
- (f) Precursor organic compound (POC) mass emissions (as CH₄) at P-1 and P-2 each shall not exceed 2.86 pounds per hour or 0.00128 lb/MM BTU of natural gas fired. (BACT)
- (g) Sulfur dioxide (SO₂) mass emissions at P-1 & P-2 each shall not exceed 6.21 pounds per hour or 0.0028 lb/MM BTU of natural gas fired. (BACT)
- (h) Particulate matter (PM₁₀) mass emissions at P-1 & P-2 each shall not exceed 7.5 pounds per hour or 0.0036 lb PM₁₀ per MM BTU of natural gas fired. (BACT)
20. The project owner shall ensure that the regulated air pollutant mass emission rates from each of the gas turbines (S-1 & S-3) during a startup or shutdown does not exceed the limits established below. The project owner shall not operate both of the Gas Turbines (S1 & S3) in Startup Mode at the same time. (PSD, CEC Conditions of Certification)

Pollutant	Cold Start-Up/ Combustor Tuning	Hot Start-Up	Warm Start-Up	Shutdown
	lb/start-up	lb/start-up	lb/start-up	lb/shutdown
NO _x (as NO ₂)	480.0	95	125	40
CO	2514	891	2514	100
POC (as CH ₄)	83	35.3	79	16

21. The owner/operator shall not perform combustor tuning on gas turbines more than once every rolling 365 day period for each S-1 and S-3. The owner/operator shall notify the District no later than 7 days prior to combustor tuning activity. (Offsets, Cumulative Emissions)



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22. The project owner shall not allow total combined emissions from the gas turbines and HRSGs (S-1, S-2, S-3 & S-4), S-5 Cooling Tower, and S-6 Fire Pump Diesel Engine, including emissions generated during gas turbine start-ups, combustor tuning, and shutdowns to exceed the following limits during any calendar day:
- (a) 1,453 pounds of NO_x (as NO₂) per day (Cumulative Emissions)
 - (b) 1,225 pounds of NO_x per day during ozone season from June 1 to September 30. (CEC Condition of Certification)
 - (c) 7,360 pounds of CO per day (PSD)
 - (d) 295 pounds of POC (as CH₄) per day (Cumulative Emissions)
 - (e) 413 pounds of PM₁₀ per day (PSD)
 - (f) 292 pounds of SO₂ per day (BACT)
23. The project owner shall not allow cumulative combined emissions from the gas turbines and HRSGs (S-1, S-2, S-3 & S-4), S-5 Cooling Tower, and S-6 Fire Pump Diesel Engine, including emissions generated during gas turbine start-ups, combustor tuning, and shutdowns to exceed the following limits during any consecutive twelve-month period:
- (a) 127 tons of NO_x (as NO₂) per year (Offsets, PSD)
 - (b) 330 tons of CO per year (Cumulative Increase, PSD)
 - (c) 28.5 tons of POC (as CH₄) per year (Offsets)
 - (d) 71.8 tons of PM₁₀ per year (Cumulative Increase, PSD)
 - (e) 12.2 tons of SO₂ per year (Cumulative Increase, PSD)
24. The owner/operator shall not allow sulfuric acid emissions (SAM) from stacks P-1 and P-2 combined to exceed 7 tons in any consecutive 12 month period. (Basis: PSD)
25. The owner/operator shall not allow the maximum projected annual toxic air contaminant emissions (per **condition 28**) from the gas turbines and HRSGs (S-1, S-2, S-3 & S-4) combined to exceed the following limits:

formaldehyde: 10,912 pounds per year

benzene: 226 pounds per year

Specified polycyclic aromatic hydrocarbons (PAHs): 1.8 pounds per year

unless the following requirement is satisfied:

The owner/operator shall perform a health risk assessment to determine the total facility risk using the emission rates determined by source testing and the most current Bay Area Air Quality Management District approved procedures and unit risk factors in effect at the time of the analysis. The owner/operator shall submit the risk analysis to the District and the CPM within 60 days of the source test date. The owner/operator may request that the District and the CPM revise the carcinogenic compound emission limits specified above. If the owner/operator demonstrates to the satisfaction of the APCO that these revised emission limits will not result in a significant cancer risk, the District and the CPM may, at their discretion, adjust the carcinogenic compound emission limits listed above. (Regulation 2, Rule 5)



26. The project owner shall demonstrate compliance with conditions **13 through 16, 19(a) (d), 20, 22(a) and (b), 23(a) and (b)** by using properly operated and maintained continuous monitors (during all hours of operation including gas turbine start-up, combustor tuning, and shutdown periods) for all of the following parameters:
- (a) Firing Hours and Fuel Flow Rates for each of the following sources: S-1 & S-3 combined, S-2 & S-4 combined.
 - (b) Oxygen (O_2) concentration, Nitrogen Oxides (NO_x) concentration, and Carbon Monoxide (CO) concentration at exhaust points P-1 and P-2.
 - (c) Ammonia injection rate at A-1 and A-3 SCR Systems

The project owner shall record all of the above parameters every 15 minutes (excluding normal calibration periods) and shall summarize all of the above parameters for each clock hour. For each calendar day, the owner/operator shall calculate and record the total firing hours, the average hourly fuel flow rates, and pollutant emission concentrations.

The project owner shall use the parameters measured above and District-approved calculation methods to calculate the following parameters:

- (d) Heat Input Rate for each of the following sources: S-1 & S-3 combined, S-2 & S-4 combined.
- (e) Corrected NO_x concentration, NO_x mass emission rate (as NO_2), corrected CO concentration, and CO mass emission rate at each of the following exhaust points: P-1 and P-2.

For each source, source grouping, or exhaust point, the owner/operator shall record the parameters specified in conditions **26(d) and (e)** at least once every 15 minutes (excluding normal calibration periods). As specified below, the owner/operator shall calculate and record the following data:

- (f) total heat input rate for every clock hour.
 - (g) on an hourly basis, the cumulative total heat input rate for each calendar day for the following: each gas turbine and associated HRSG combined and all four sources (S-1, S-2, S-3 and S-4) combined.
 - (h) the average NO_x mass emission rate (as NO_2), CO mass emission rate, and corrected NO_x and CO emission concentrations for every clock hour..
 - (i) on an hourly basis, the cumulative total NO_x mass emissions (as NO_2) and the cumulative total CO mass emissions, for each calendar day for the following: each gas turbine and associated HRSG combined and all four sources (S-1, S-2, S-3 and S-4) combined.
 - (j) For each calendar day, the average hourly heat input rates, corrected NO_x emission concentration, NO_x mass emission rate (as NO_2), corrected CO emission concentration, and CO mass emission rate for each gas turbine and associated HRSG combined.
 - (k) on a daily basis, the cumulative total NO_x mass emissions (as NO_2) and cumulative total CO mass emissions, for the previous consecutive twelve month period for all four sources (S-1, S-2, S-3 and S-4) combined.
- (1-520.1, 9-9-501, BACT, Offsets, NSPS, Cumulative Increase)



27. To demonstrate compliance with conditions **19(f) thru (h)**, **22(c) thru (e)**, **23(c) thru (e)**, the owner/operator shall calculate and record on a daily basis, the Precursor Organic Compound (POC) mass emissions, Fine Particulate Matter (PM₁₀) mass emissions (including condensable particulate matter), and Sulfur Dioxide (SO₂) mass emissions from each power train. The owner/operator shall use the actual heat input rates measured pursuant to **condition 26**, actual gas turbine start-up times, actual gas turbine shutdown times, and CEC and District-approved emission factors developed pursuant to source testing under condition 30 to calculate these emissions. The owner/operator shall present the calculated emissions in the following format:
- (a) For each calendar day, POC, PM₁₀, and SO₂ emissions, summarized for each power train (gas turbine and its respective HRSG combined) and all four sources (S-1, S-2, S-3 & S-4) combined
 - (b) on a daily basis, the cumulative total POC, PM₁₀, and SO₂ mass emissions, for each year for all four sources (S-1, S-2, S-3 & S-4) combined
(Offsets, PSD, Cumulative Increase)
28. To demonstrate compliance with **Condition 25**, the owner/operator shall calculate and record on an annual basis the maximum projected annual emissions of: Formaldehyde, Benzene, and Specified PAH's. The owner/operator shall calculate the maximum projected annual emissions using the maximum annual heat input rate of 35,708,858 MM BTU/year and the highest emission factor (pounds of pollutant per MM BTU of heat input) determined by any source test of the S-1 and S-3 gas turbines and/or S-2 and S-4 HRSGs. If the highest emission factor for a given pollutant occurs during minimum-load turbine operation, a reduced annual heat input rate may be utilized to calculate the maximum projected annual emissions to reflect the reduced heat input rates during gas turbine start-up and minimum-load operation. The reduced annual heat input rate shall be subject to District review and approval. (Regulation 2, Rule 5)
29. Within 90 days of start-up of the RCEC, the owner/operator shall conduct a District-approved source test on exhaust point P-1 or P-2 to determine the corrected ammonia (NH₃) emission concentration to determine compliance with **condition 19(e)**. The source test shall determine the correlation between the heat input rates of the gas turbine and associated HRSG, A-2 or A-4 SCR System ammonia injection rate, and the corresponding NH₃ emission concentration at emission point P-1 or P-2. The source test shall be conducted over the expected operating range of the turbine and HRSG (including, but not limited to, minimum and full load modes) to establish the range of ammonia injection rates necessary to achieve NO_x emission reductions while maintaining ammonia slip levels. The owner/operator shall repeat the source testing on an annual basis thereafter. Ongoing compliance with **condition 19(e)** shall be demonstrated through calculations of corrected ammonia concentrations based upon the source test correlation and continuous records of ammonia injection rate. The owner/operator shall submit the source test results to the District and the CPM within 60 days of conducting the tests. (Regulation 2, Rule 5)
30. Within 90 days of start-up of the RCEC and on an annual basis thereafter, the owner/operator shall conduct a District-approved source test on exhaust points P-1 and P-2 while each gas turbine and associated Heat Recovery Steam Generator are operating at maximum load to determine compliance with **Conditions 19(a),(b), (c), (d), (f), (g), and (h)** and while each gas turbine and associated Heat Recovery Steam Generator are operating at minimum load to



determine compliance with **Conditions 19(c) and (d)**, and to verify the accuracy of the continuous emission monitors required in **condition 26**. The owner/operator shall test for (as a minimum): water content, stack gas flow rate, oxygen concentration, precursor organic compound concentration and mass emissions, nitrogen oxide concentration and mass emissions (as NO₂), carbon monoxide concentration and mass emissions, sulfur dioxide concentration and mass emissions, methane, ethane, and particulate matter (PM₁₀) emissions including condensable particulate matter. The owner/operator shall submit the source test results to the District and the CEC CPM within 60 days of conducting the tests. (BACT, offsets)

31. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section and the CPM prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements for continuous emission monitors as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section and the CPM in writing of the source test protocols and projected test dates at least 7 days prior to the testing date(s). As indicated above, the owner/operator shall measure the contribution of condensable PM (back half) to the total PM₁₀ emissions. However, the owner/operator may propose alternative measuring techniques to measure condensable PM such as the use of a dilution tunnel or other appropriate method used to capture semi-volatile organic compounds. The owner/operator shall submit the source test results to the District and the CPM within 60 days of conducting the tests. (BACT)
32. Within 90 days of start-up of the RCEC and on a biennial basis (once every two years) thereafter, the owner/operator shall conduct a District-approved source test on exhaust point P-1 or P-2 while the gas turbine and associated Heat Recovery Steam Generator are operating at maximum allowable operating rates to demonstrate compliance with **Condition 25**. The owner/operator shall also test the gas turbine while it is operating at minimum load. If three consecutive biennial source tests demonstrate that the annual emission rates calculated pursuant to **condition 25** for any of the compounds listed below are less than the BAAQMD trigger levels, pursuant to Regulation 2, Rule 5, shown, then the owner/operator may discontinue future testing for that pollutant:

Benzene	≤	6.4 pounds/year and 2.9 pounds/hour
Formaldehyde	≤	30 pounds/year and 0.21 pounds/hour
Specified PAHs	≤	0.011 pounds/year

(Regulation 2, Rule 5)

33. The owner/operator shall calculate the SAM emission rate using the total heat input for the sources and the highest results of any source testing conducted pursuant to **condition 30**. If this SAM mass emission limit of **condition 24** is exceeded, the owner/operator must utilize air dispersion modeling to determine the impact (in µg/m³) of the sulfuric acid mist emissions pursuant to Regulation 2-2-306. (PSD)
34. Within 90 days of start-up of the RCEC and on an annual basis thereafter, the owner/operator shall conduct a District-approved source test on exhaust points P-1 and P-2 while each gas turbine and HRSG duct burner is operating at maximum heat input rates to demonstrate compliance with the SAM emission rates specified in **condition 24**. The owner/operator shall test for (as a minimum) SO₂, SO₃, and H₂SO₄. After acquiring one year of source test data on



these sources, the owner/operator may petition the District to reduce the test frequency to an annual basis if test result variability is sufficiently low as determined by the District. The owner/operator shall submit the source test results to the District and the CPM within 60 days of conducting the tests. (PSD)

35. The owner/operator of the RCEC shall submit all reports (including, but not limited to monthly CEM reports, monitor breakdown reports, emission excess reports, equipment breakdown reports, etc.) as required by District Rules or Regulations and in accordance with all procedures and time limits specified in the Rule, Regulation, Manual of Procedures, or Enforcement Division Policies & Procedures Manual. (Regulation 2-6-502)
36. The owner/operator of the RCEC shall maintain all records and reports on site for a minimum of 5 years. These records shall include but are not limited to: continuous monitoring records (firing hours, fuel flows, emission rates, monitor excesses, breakdowns, etc.), source test and analytical records, natural gas sulfur content analysis results, emission calculation records, records of plant upsets and related incidents. The owner/operator shall make all records and reports available to District and the CPM staff upon request. (Regulation 2-6-501)
37. The owner/operator of the RCEC shall notify the District and the CPM of any violations of these permit conditions. Notification shall be submitted in a timely manner, in accordance with all applicable District Rules, Regulations, and the Manual of Procedures. Notwithstanding the notification and reporting requirements given in any District Rule, Regulation, or the Manual of Procedures, the owner/operator shall submit written notification (facsimile is acceptable) to the Enforcement Division within 96 hours of the violation of any permit condition. (Regulation 2-1-403)
38. The owner/operator shall ensure that the stack height of emission points P-1 and P-2 is each at least 145 feet above grade level at the stack base. (PSD, Regulation 2-5)
39. The Owner/Operator of RCEC shall provide adequate stack sampling ports and platforms to enable the performance of source testing. The location and configuration of the stack sampling ports shall comply with the District Manual of Procedures, Volume IV, Source Test Policy and Procedures, and shall be subject to BAAQMD review and approval. (Regulation 1-501)
40. Within 180 days of the issuance of the Authority to Construct for the RCEC, the Owner/Operator shall contact the BAAQMD Technical Services Division regarding requirements for the continuous emission monitors, sampling ports, platforms, and source tests required by **conditions 29, 30, 32, 34, and 43**. The owner/operator shall conduct all source testing and monitoring in accordance with the District approved procedures. (Regulation 1-501)
41. Pursuant to BAAQMD Regulation 2, Rule 6, section 404.1, the owner/operator of the RCEC shall submit an application to the BAAQMD for a major facility review permit within 12 months of completing construction as demonstrated by the first firing of any gas turbine or HRSG duct burner. (Regulation 2-6-404.1)
42. Pursuant to 40 CFR Part 72.30(b)(2)(ii) of the Federal Acid Rain Program, the owner/operator of the Russell City Energy Center shall submit an application for a Title IV operating permit to the BAAQMD at least 24 months before operation of any of the gas turbines (S-1, S-3, S-5, or S-7) or HRSGs (S-2, S-4, S-6, or S-8). (Regulation 2, Rule 7)
43. The owner/operator shall ensure that the Russell City Energy Center complies with the continuous emission monitoring requirements of 40 CFR Part 75. (Regulation 2, Rule 7)



Permit Conditions for Cooling Towers

44. The project owner shall properly install and maintain the S-5 cooling tower to minimize drift losses. The owner/operator shall equip the cooling towers with high-efficiency mist eliminators with a maximum guaranteed drift rate of 0.0005%. The maximum total dissolved solids (TDS) measured at the base of the cooling towers or at the point of return to the wastewater facility shall not be higher than 6,200 ppmw (mg/l). The project owner shall sample and test the cooling tower water at least once per day to verify compliance with this TDS limit. (PSD)
45. The owner/operator shall perform a visual inspection of the cooling tower drift eliminators at least once per calendar year, and repair or replace any drift eliminator components which are broken or missing. Prior to the initial operation of the Russell City Energy Center, the owner/operator shall have the cooling tower vendor's field representative inspect the cooling tower drift eliminators and certify that the installation was performed in a satisfactory manner. Within 60 days of the initial operation of the cooling tower, the owner/operator shall perform an initial performance source test to determine the PM₁₀ emission rate from the cooling tower to verify compliance with the vendor-guaranteed drift rate specified in **condition 44**. The CPM may require the owner/operator to perform source tests to verify continued compliance with the vendor-guaranteed drift rate specified in **condition 44**(PSD)

Permit Conditions for S-6 Fire Pump Diesel Engine

46. The owner/operator shall not operate S-6 Fire Pump Diesel Engine more than 50 hours per year for reliability-related activities. ("Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(2)(A)(3) or (e)(2)(B)(3), offsets)
47. The owner/operator shall operate S-6 Fire Pump Diesel Engine only for the following purposes: to mitigate emergency conditions, for emission testing to demonstrate compliance with a District, state or Federal emission limit, or for reliability-related activities (maintenance and other testing, but excluding emission testing). Operating hours while mitigating emergency conditions or while emission testing to show compliance with District, state or Federal emission limits is not limited. ("Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection 9e)(2)(A)(3) or (e)(2)(B)(3))
48. The owner/operator shall operate S-6 Fire Pump Diesel Engine only when a non-resettable totalizing meter (with a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained. ("Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(4)(G)(1), cumulative increase)
49. Records: The owner/operator shall maintain the following monthly records in a District-approved log for at least 60 months from the date of entry. Log entries shall be retained on-



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site, either at a central location or at the engine's location, and made immediately available to the District staff upon request.

- a. Hours of operation for reliability-related activities (maintenance and testing).
- b. Hours of operation for emission testing to show compliance with emission limits.
- c. Hours of operation (emergency).
- d. For each emergency, the nature of the emergency condition.
- e. Fuel usage for each engine(s).

(Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(4)(I), cumulative increase)

End of Conditions