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 **March 1, 2013** through **August 31, 2013**.

(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 gr/dscf @ 6% 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 |
| | NSPS Subpart GG 60.332 (a)(2) | Y | | 141 ppmv @15% O ₂ | NSPS Subpart GG 60.334(a) | С | Water-to fuel ratio | Yes |
| | 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 | Yes |

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| 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 9 | P/A | Source Test | Yes |
| S02 | 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 | | Ν | | 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 | с | 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 | с | Continuous Water-to- Fuel Ratio | Yes |

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(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 |
|------------------|---|-----------|-----------------------------|--|---|------------------------------------|--------------------------------------|----------------------|
| РМ | 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 |
| S02 | 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 | с | 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.

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