CALPINE GILROY COGEN, L.P. & GILROY ENERGY CENTER, L.L.C.

1400 Pacheco Pass Hwy
Gilroy, CA 95021-1764

May 7, 2021

TV Tracking #: 226

1. ☐ RECEIVED IN ENFORCEMENT: 05/10/2021

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105-2097
Attn: Title V Reports
Via Email: compliance@baaqmd.gov

Re: Calpine Gilroy Cogen, L.P. & Gilroy Energy Center, LLC #B1180
Title V Semi-Annual Monitoring Report
Reporting Period October 31, 2020 – April 30, 2021

Dear Director:

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Calpine Gilroy Cogen, L.P. & Gilroy Energy Center, LLC ("Gilroy") for the reporting period from October 31, 2020 – April 30, 2021.

Gilroy is currently in compliance with the District CEMS regulations. Gilroy maintained compliance with the monitoring requirements listed in the Title V permit during this reporting period.

By signing this report I am certifying that based on information and belief formed after reasonable inquiry, the statements and information in the attached report are true, accurate, and complete.

If you have any questions or require additional information, do not hesitate to contact Rosemary Silva, EHS Specialist, at (408) 361-4954.

Sincerely,

Kevin Karwick
Authorized Signatory and General Manager
Calpine Gilroy Cogen, L.P. &
Gilroy Energy Center, LLC

Cc: Region IX, EPA
Mary Dyas CEC

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4, S-5, TURBINES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
NO_x	BAAQMD 9-9-301.1.3	N		9 ppmv @ 15% O_2, dry	BAAQMD 9-9-501	C	CEMS	Continuous
	BAAQMD 9-9-301.2	N		0.43 lb/MW-hr or 9 ppmv	BAAQMD 9-9-501	C	CEMS	Continuous
NO_x	SIP 9-9-301.3	Y		9 ppmv @ 15% O_2, dry	BAAQMD 9-9-501 and BAAQMD condition #18102, part 24	C	CEMS	Continuous
	SIP 9-9-301.3	Y		9 ppmv @ 15% O_2, dry	BAAQMD condition #18102, part 25	P	Source test every 8,000 hrs. or every 3 yrs., whichever comes first	Continuous
NO_x	NSPS, 40 CFR 60.332 (a)(1)	Y		99 ppmv @ 15% O_2, dry 4-hour rolling average (Arithmetic average of the average NO_x concentration measured by the CEMS for a given hour and the three unit operating hour average NO_x concentrations immediately preceding that unit operating hour)	NSPS, 40 CFR 60.334 (b)	C	CEMS	Continuous
	None	Y		None	40 CFR 75.10	C	CEMS	Continuous
	BAAQMD condition #18102, part 19.1	Y		5 ppmv @ 15% O_2, dry, 1-hr average except during turbine startup or shutdown	BAAQMD condition #18102, part 19.1, 24	C	CEMS	Continuous
	BAAQMD condition #18102, part 19.1	Y		5 ppmv @ 15% O_2, dry, 1-hr average except during turbine startup or shutdown	BAAQMD condition #18102, part 25	P	Source test every 8,000 hrs. or every 3 yrs., whichever comes first	Continuous
	BAAQMD condition #18102, part 22	Y		604.8 lb/calendar day (as NO_2) for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 24	C	CEMS	Continuous

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4, S-5, TURBINES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
NO_x	BAAQMD condition #18102, part 22	Y		39.5 tons per calendar year (as NO_2) for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 24	C	CEMS	Continuous
CO	BAAQMD condition #18102, part 19.3	Y		6 ppmv @ 15% O_2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #18102, parts 19.3 and 24	C	CEMS	Continuous
	BAAQMD condition #18102, part 19.3	Y		6 ppmv @ 15% O_2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #18102, part 25	P	Source test every 8,000 hrs. or every 3 yrs., whichever comes first	Continuous
	BAAQMD condition #18102, part 22	Y		446.1 lb/calendar day for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 24	C	CEMS	Continuous
CO	BAAQMD condition #18102, part 22	Y		36.0 tons per calendar year for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 24	C	CEMS	Continuous
CO_2		Y		None	40 CFR 75.10	C	CEMS (CO_2) or CEMS (O_2) or fuel flow monitor	Continuous
SO_2	BAAQMD 9-1-301	Y		GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		Continuous
	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD condition #18102, part 24	P/A	Total sulfur and hydrogen sulfide analysis	Continuous

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4, S-5, TURBINES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
SO_2	NSPS 40 CFR 60.333(a) or 60.333(b)	Y		SO_2 in gases exiting turbine ≤ 0.015% (vol.) @15% O_2 (dry) or Total sulfur in fuel combusted in turbines ≤ 0.8% by wt. (8000 ppmw)	NSPS, 40 CFR 60.334 (h)(1)	N		Continuous
SO_2	None	Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measure-ments, calculations	Continuous
SO_2	BAAQMD condition #18102, part 19.6	Y		0.33 lb/clock hr for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 24	P/A	Total sulfur and hydrogen sulfide analysis	Continuous
	BAAQMD condition #18102, part 19.6	Y		0.33 lb/clock hr for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 25	P	Source test every 8,000 hrs. or every 3 yrs., whichever comes first	Continuous
SO_2	BAAQMD condition #18102, part 22	Y		23.8 lb/calendar day for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 24	P/A	Total sulfur and hydrogen sulfide analysis	Continuous
	BAAQMD condition #18102, part 22	Y		1.9 tons/calendar year for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 24	P/A	Total sulfur and hydrogen sulfide analysis	Continuous
	BAAQMD condition #18102, part 23.b	Y		Total sulfur content in natural gas combusted in turbines ≤ 1.0 gr/100 ~~0.25 gr/100~~ scf	BAAQMD condition #18102, part 24.e	P/Q	Analysis of total sulfur content in fuel	Continuous
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4, S-5, TURBINES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous
Opacity	BAAQMD condition #18102, part 18	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour or equivalent 20% opacity		N		Continuous
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		Continuous
FP	SIP 6-310	Y		0.15 grain/dscf		N		Continuous
PM_{10}	BAAQMD condition #18102, part 19.5	Y		2.5 lb/clock hr for each turbine, except during turbine startup or shutdown	BAAQMD condition #18102, part 25	P	Source test every 8,000 hrs. or every 3 yrs., whichever comes first	Continuous
PM_{10}	BAAQMD condition #18102, part 22	Y		180 lb/calendar day for S-3, S-4 & S-5 combined	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first, and fuel monitoring	Continuous
PM_{10}	BAAQMD condition #18102, part 22	Y		14.7 tons/year for S-3, S-4 & S-5 combined	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first, and fuel monitoring	Continuous
POC	BAAQMD condition #18102, part 19.4	Y		2 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #18102, part 19.4	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4, S-5, TURBINES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
POC	BAAQMD condition #18102, part 19.4	Y		2 ppmv @ 15% O_2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous
	BAAQMD condition #18102, part 22	Y		84 lb/calendar day for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first., and fuel monitoring	Continuous
POC	BAAQMD condition #18102, part 22	Y		6.9 ton/calendar year for S-3, S-4, and S-5 combined	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first., and fuel monitoring	Continuous
NH3	BAAQMD condition #18102, Part 19.2	N		10 ppmv @ 15% O_2, dry, averaged over 3 hrs except during turbine startup or shutdown	BAAQMD condition #18102, parts 19.2 and 24, 25	C	Ammonia injection rate monitor, calculations, and periodic source testing every 8,000 hrs. or every 3 yrs., whichever comes first	Continuous
	BAAQMD condition #18102, Part 19.2	N		10 ppmv @ 15% O_2, dry, averaged over 3 hrs except during turbine startup or shutdown	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4, S-5, TURBINES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
Heat input limit	BAAQMD condition #18102, part 23	Y		500 MM BTU/clock hr (HHV) for each turbine, S-3, S-4, and S-5	BAAQMD condition #18102, part 24d	C	Fuel meter, firing monitor	Continuous
	BAAQMD condition #18102, part 23	Y		500 MM BTU/clock hr (HHV), for each turbine, S-3, S-4, and S-5	BAAQMD condition #18102, part 24d	P/Q	Fuel composition analysis	Continuous
Heat input limit	BAAQMD condition #18102, part 23	Y		500 MM BTU/clock hr (HHV), for each turbine, S-3, S-4, and S-5	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous
Heat input limit	BAAQMD condition #18102, part 23	Y		12,000 MM BTU/day (HHV) for each turbine, S-3, S-4, and S-5	BAAQMD condition #18102, part 30.a	C	fuel meter, firing monitor, calculations	Continuous
	BAAQMD condition #18102, part 23	Y		12,000 MM BTU/day (HHV) for each turbine, S-3, S-4, and S-5	BAAQMD condition #18102, part 24d	P/Q	Fuel composition analysis	Continuous
Heat input limit	BAAQMD condition #18102, part 23	Y		5,494,300 MM BTU/yr, for S-3, S-4, and S-5, Turbines combined	BAAQMD condition #18102, part 30.a	C	fuel meter, firing monitor, calculations	Continuous
Heat input limit	BAAQMD condition #18102, part 23	Y		5,494,300 MM BTU/yr, for S-3, S-4, and S-5, Turbines combined	BAAQMD condition #18102, part 24d	P/Q	Fuel composition analysis	Continuous
MW				None	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4, S-5, TURBINES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
Gas tempe-rature				None	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous
Stack gas flow				None	BAAQMD condition #18102, part 25	P	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous
NH3 injection rate				None	BAAQMD condition #18102, part 25	P/A	Source Test every 8,000 hrs. or every 3 yrs., whichever comes first.	Continuous

Table VII-B
S-100 – GAS TURBINE

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
NO_x	BAAQMD 9-9-301.1.2 and 9-9-401	N		≤ 15 ppmv* @ 15% O_2, dry, 3-hr average *corrected for efficiency	9-9-501	C	CEMS	Continuous
NOx	BAAQMD 9-9-301.2	N		≤ 5 ppmv @ 15% O2, dry, 3-hr average or ≤ 0.15 lbs/MWhr	9-9-501	C	CEMS	Continuous
NO_x	SIP 9-9-305 and 9-9-401	Y		≤ 21.0 ppmv* @ 15% O_2, dry, 3-hr average *corrected for efficiency	BAAQMD 9-9-501	C	CEMS	Continuous
	BAAQMD Permit Cond# 2780 part 1a(i)	Y		≤ 25 ppmv @ 15% O_2, 3-hr avg	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
	BAAQMD Permit Cond# 2780, part 1a(ii)	Y		< 5 ppmv @ 15% O2 or 0.15 lb/MW-hr, 3-hr avg.	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
	BAAQMD Permit Cond# 2780, part 1e	Y		≤ 21.0 ppmv @ 15% O_2, dry, calendar day average	BAAQMD 9-9-501	C	CEMS	Continuous
NO_x	BAAQMD Permit Cond# 2780, part 1f	Y		< 323.7 tons per any twelve consecutive months	BAAQMD 9-9-501	C	CEMS	Continuous
	BAAQMD Permit Cond# 2780, part 1g	Y		< 1876 lb per calendar day	BAAQMD 9-9-501	C	CEMS	Continuous
	BAAQMD permit condition # 21961, part IX-C.	Y		≤ 25 ppmv @ 15% O_2, dry 3-hr average	BAAQMD 9-9-501	C	CEMS	Continuous

Table VII-B
S-100 – GAS TURBINE

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
NO_x	BAAQMD permit condition # 21961, part IX-C.	Y		Natural Gas or Fuel Oil ≤ 25 ppmv @ 15% O_2, dry 3-hr average	BAAQMD permit condition # 21961, part IX-E.	C	CEMS	Continuous
NO_x	NSPS, 40 CFR 60.332 (a)(1)	Y		82 ppmv @ 15% O_2, dry 4-hour rolling average (Arithmetic average of the average NO_x concentration measured by the CEMS for a given hour and the three unit operating hour average NO_x concentrations immediately preceding that unit operating hour)	NSPS, 40 CFR 60.334 (b) Note: 60.334(c) also applies after the installation of Dry Low NOx Combustors on January 1, 2012	C	CEMS	Continuous
	None	Y		None	40 CFR 75.10	C	CEMS	Continuous
POC	BAAQMD Permit Condition 2780, part 6	Y		< 40 TPY NMHC for S-100, S-101, S-102		N		Continuous
SO_2	None	Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measure-ments, calculations	Continuous
SO_2	BAAQMD 9-1-301	Y		GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		Continuous
SO_2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		Continuous

Table VII-B
S-100 – GAS TURBINE

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
SO_2	NSPS 40 CFR 60.333 (a) or 60.333(b)	Y		SO_2 in gases exiting turbine ≤ 0.015% (vol.) @15% O_2 (dry) or Total sulfur in fuel combusted in turbines ≤ 0.8% by wt. (8000 ppmw)	NSPS, 40 CFR 60.334 (h)(1)	N		Continuous
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous
Opacity	BAAQMD 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous
FP	BAAQMD 6-1-310.3	N		0.15 grain/dscf @6% O_2		N		Continuous
FP	SIP 6-310.3	Y		0.15 grain/dscf @6% O_2		N		Continuous
FP	BAAQMD Permit Condition 2780, part 6	Y		< 25 TPY total FP for S-100, S-101, S-102		N		Continuous
CO_2		Y		None	40 CFR 75.10	C	CEMS (CO_2) or CEMS (O_2) or fuel flow monitor	Continuous
Carbon Monoxide	BAAQMD Permit Condition 2780, part 3b	Y		emissions < 100 tons/yr (for S-100, S-101, and S-102)	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
Carbon Monoxide	BAAQMD Permit Condition 2780, part 3c	Y		10 ppmvd @ 15% O_2, 3-hr average, except during startup, shutdown, operation at < 80% load, and operation at low ambient temperature	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous

Table VII-B
S-100 – GAS TURBINE

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
Carbon Monoxide	BAAQMD Permit Condition 2780, part 3d	Y		< 14670 lbs. CO during startups and shutdowns per any consecutive 12-month period	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
	BAAQMD Permit Condition 2780, part 3e	Y		< 750 hours of operation at < 80% load per any consecutive 12-month period	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
Carbon Monoxide	BAAQMD Permit Condition 2780, part 3e	Y		< 14.8 tons CO during operation at < 80% load per any consecutive 12-month period	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
Carbon Monoxide	BAAQMD Permit Condition 2780, part 3f	Y		< 100 hours of operation at ambient temperatures < 35° F. per any consecutive 12-month period	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
Carbon Monoxide	BAAQMD Permit Condition 2780, part 3f	Y		15 ppmvd @ 15% O_2, 1-hr average, during operation at low ambient temperature	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous

[1] Ground Level Concentration

Table VII-C
S-101, S-102 – BOILERS

Type of limit	Citation of Limit	FE Y/N	Future Effectiv e Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
NO_x	BAAQMD 9-7-301.1	N		30 ppmv @3%O_2, dry, 3-hr average	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
	SIP 9-7-301.1	Y		30 ppmv @3%O_2, dry, 3-hr average	BAAQMD Permit Condition 2780, part 11, BAAQMD 1-520.1	C	CEMS	Continuous
	BAAQMD 9-7-307.6	N		5 ppmv @3%O_2, dry, 3-hr average	BAAQMD Permit Condition 2780, part 11, BAAQMD Condition 25512 part 3, BAAQMD 1-520.1	C	CEMS	Continuous
NO_x	BAAQMD Permit Condition 2780, part 4	Y		40 ppmv @ 3%O_2, dry,, 3-hr average	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
	BAAQMD permit condition #21961, part IX-C	Y		≤ 40 ppmv @ 3% O_2, dry, 3-hr average	BAAQMD permit condition # 21961, part IX-D.	C	CEMS	Continuous
	BAAQMD Condition 25512 part 2	N		5 ppmv @3%O_2, dry, 3-hr average	BAAQMD Condition 25512 part 3	C	CEMS	Continuous
NO_x	NSPS 60.44b(a)	Y		0.2 lb/MM Btu, averaged over 24 hrs		N		Continuous
CO	BAAQMD 9-7-301.4	N		400 ppmv @ 3% O_2, dry, 3-hr average		N		Continuous
CO	SIP 9-7-301.2	Y		400 ppmv @ 3% O_2, dry, 3-hr average		N		Continuous

Table VII-C
S-101, S-102 – BOILERS

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance (Intermittent/Continuous)
	BAAQMD Permit Condition 2780, part 3b	Y		< 100 tons per year, for S-100, S-101, and S-102	BAAQMD Permit Condition 2780, part 11	C	CEMS	Continuous
SO_2	BAAQMD 9-1-301	Y		GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		Continuous
	BAAQMD 9-1-302	Y		300 ppm (dry)		N		Continuous
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous
FP	BAAQMD 6-1-310.3	N		0.15 grain/dscf @ 6% O_2		N		Continuous
FP	SIP 6-310.3	Y		0.15 grain/dscf @ 6% O_2		N		Continuous
FP	BAAQMD Permit Condition 2780, part 6	Y		< 25 TPY FP for S-100, S-101, S-102		N		Continuous
POC	BAAQMD Permit Condition 2780, part 6	Y		< 40 TPY NMHC for S-100, S-101, S-102		N		Continuous
NH3	BAAQMD Condition 25512 part 4	N		10 ppm @ 3 % O2	BAAQMD Condition 25512 part 5	P	Annual source test	Continuous
Hours of operation	BAAQMD Permit Condition 2780, part 18	Y		Simultaneous use with the gas turbine < combined total of 28 boiler hours/day or 3950 boiler hours/year	none	P/E	Record-keeping	Continuous
Hours of operation	BAAQMD Condition 25512 part 6	N		15,800 hours combined for S-101 and S-102	none	P/E	Record-keeping	Continuous

Table VII-D
S-104 – 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 (Intermittent/Continuous)
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Continuous
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		Continuous
FP	SIP 6-310	Y		0.15 grain/dscf		N		Continuous
	BAAQMD 6-1-311	Y		40 lbs/hr		N		Continuous
	SIP 6-311	Y		40 lbs/hr		N		Continuous