

Gilroy Energy Center, LLC (for Lambie Energy Center)

5975 Lambie Road
Suisun City, CA 94585

January 18, 2022

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V

TV Tracking #: 359

1. RECEIVED IN ENFORCEMENT: 01/20/2022

**Subject: Gilroy Energy Center, LLC for the Lambie Energy Center
Title V Semi-Annual Monitoring Report
Facility # B4415
Reporting Period: July 1, 2021 through December 31, 2021**

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Lambie Energy Center ("LEC") for the reporting period from July 1, 2021 through December 31, 2021.

LEC is currently in compliance with the District CEMS regulations. LEC maintained compliance with the monitoring requirements listed in the Title V permit for LEC 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, please contact me at (707) 399-4393.

Sincerely,

Andrew Gundershaug
Plant Manager and Designated Representative/Responsible Official

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-2 – COMBUSTION GAS TURBINE
July 1, 2021 through December 31, 2021

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|---------------|------------------------------------|--------|-----------------------|---|--|--|-----------------|------------|----|
| | | | | | | | | Yes | No |
| NOx | BAAQMD 9-9-301.1.3 | N | | 9 ppmv @ 15% O ₂ , dry | BAAQMD 9-9-501 and BAAQMD condition #20134, part 23c | C | CEM | X | |
| NOx | BAAQMD 9-9-301.1.3 | N | | 9 ppmv @ 15% O ₂ , dry | BAAQMD condition #20134, part 24a | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| NOx | SIP Regulation 9-9-301.3 | Y | | 9 ppmv @ 15% O ₂ , dry | SIP Regulation 9-9-501 and BAAQMD condition #20134, part 23c | C | CEM | X | |
| NOx | SIP Regulation 9-9-301.3 | Y | | 9 ppmv @ 15% O ₂ , dry | BAAQMD condition #20134, part 24a | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| NOx | NSPS, 40 CFR 60.332 (a)(1) | Y | | 75 ppmv @ 15% O ₂ , dry | NSPS 40 CFR 60.334(b) | C | CEM | X | |
| NOx | None | Y | | None | 40 CFR 75.10 | C | CEM | X | |
| NOx | BAAQMD condition #20134, part 18.1 | Y | | 2.5 ppmv @ 15% O ₂ , dry, 3-hr rolling average except during turbine startup or shutdown | BAAQMD condition #20134, parts 18.1 and 23c | C | CEM | X | |
| NOx | BAAQMD condition #20134, part 18.1 | Y | | 2.5 ppmv @ 15% O ₂ , dry, 3-hr average except during turbine startup or shutdown | BAAQMD condition #20134, part 24a | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| NOx | BAAQMD condition #20134, part 21 | Y | | 121 lb/calendar day (as NO ₂) | BAAQMD condition #20134, part 23c | C | CEM | X | |
| NOx | BAAQMD condition #20134, part 21 | Y | | 16.4 tons per calendar year (as NO ₂) | BAAQMD condition #20134, part 23c | C | CEM | X | |
| CO | BAAQMD condition #20134, part 18.3 | Y | | 6 ppmv @ 15% O ₂ , dry, 3-hr average except during turbine startup or shutdown | BAAQMD condition #20134, parts 18.3 and 23c | C | CEM | X | |

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|-----------------|------------------------------------|--------|-----------------------|---|--|--|--|------------|----|
| | | | | | | | | Yes | No |
| CO | BAAQMD condition #20134, part 18.3 | Y | | 6 ppmv @ 15% O ₂ , dry, 3-hr average except during turbine startup or shutdown | BAAQMD condition #20134, part 24c | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| CO | BAAQMD condition #20134, part 21 | Y | | 163 lb/calendar day | BAAQMD condition #20134, part 23c | C | CEM | X | |
| CO | BAAQMD condition #20134, part 21 | Y | | 29.1 tons per calendar year | BAAQMD condition #20134, part 23c | C | CEM | X | |
| CO ₂ | | Y | | None | 40 CFR 75.10 | C | CEM (CO ₂) or CEM (O ₂) or fuel flow monitor | X | |
| 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 | | X | |
| SO ₂ | SIP 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 | | X | |
| SO ₂ | BAAQMD 9-1-302 | Y | | 300 ppm (dry) | BAAQMD condition #20134, part 24f | P/8000 hrs or 3 yrs whichever comes first | Source test | X | |
| SO ₂ | BAAQMD 9-1-302 | Y | | 300 ppm (dry) | BAAQMD condition #20134, part 23e | P/Q | Total sulfur analysis | X | |
| SO ₂ | SIP 9-1-302 | Y | | 300 ppm (dry) | BAAQMD condition #20010, part 23e | P/Q | Fuel Gas Total sulfur content analysis | X | |
| SO ₂ | NSPS 40 CFR Subpart GG 60.333(a) | Y | | 0.015% (vol.) @ 15% O ₂ (dry) | 40 CFR 75.11(d)(2), 40 CFR 75, Appendix D, part 2.3 NSPS 40 CFR 60.334(h)(3) | | Fuel measurements, calculations | X | |
| SO ₂ | None | Y | | None | 40 CFR 75.11(d)(2), 40 CFR 75, Appendix D, part 2.3 | | Fuel measurements, calculations | X | |
| SO ₂ | BAAQMD condition #20134, part 18.6 | Y | | 1.39 lb/hr excluding startup and shutdown of turbines | BAAQMD condition #20134, part 23e | P/Q | Total sulfur analysis | X | |
| SO ₂ | BAAQMD condition #20134, part 18.6 | Y | | 1.39 lb/hr excluding startup and shutdown of turbines | BAAQMD condition #20134, part 24f | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|------------------------|------------------------------------|--------|-----------------------|---|---|--|--|------------|----|
| | | | | | | | | Yes | No |
| SO ₂ | BAAQMD condition #20134, part 21 | Y | | 33 lb/calendar day | BAAQMD condition #20134, part 24f | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| SO ₂ | BAAQMD condition #20134, part 21 | Y | | 6.0 tons/calendar year | BAAQMD condition #20134, part 24f | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| Opacity | BAAQMD 6-1-301 | N | | ≥ Ringelmann No. 1 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | SIP Regulation 6-301 | Y | | ≥ Ringelmann No. 1 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | BAAQMD condition #20134, part 17 | Y | | ≥ Ringelmann No. 1 for no more than 3 minutes in any hour or equivalent 20% opacity | | N | | X | |
| Filterable Particulate | BAAQMD 6-1-310 | N | | 0.15 grain/dscf | | N | | X | |
| Filterable Particulate | SIP Regulation 6-310 | Y | | 0.15 grain/dscf | | N | | X | |
| PM ₁₀ | BAAQMD condition #20134, part 18.5 | Y | | 3.0 lb/ hr for S-1 | BAAQMD condition #20134, part 24e | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| PM ₁₀ | BAAQMD condition #20134, part 21 | Y | | 72 lb/calendar day | BAAQMD condition #20134, part 24e | P/8000 hrs or 3 yrs whichever comes first. | Source Test | X | |
| PM ₁₀ | BAAQMD condition #20134, part 21 | Y | | 13.1 tons/calendar year | BAAQMD condition #20134, part 24e | P/8000 hrs or 3 yrs whichever comes first. | Source Test | X | |
| POC | BAAQMD condition #20134, part 18.4 | Y | | 2 ppmv @ 15% O ₂ , dry, except during turbine startup or shutdown | BAAQMD condition #20134, part 24d | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| POC | BAAQMD condition #20134, part 21 | Y | | 30.0 lb/calendar day | BAAQMD condition #20134, part 24d | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| POC | BAAQMD condition #20134, part 21 | Y | | 4.9 ton/calendar year | BAAQMD condition #20134, part 24d | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| NH ₃ | BAAQMD condition #20134, Part 18.2 | N | | 10 ppmv @ 15% O ₂ , dry, except during turbine startup or shutdown | BAAQMD condition #20134, parts 18.2 and 23b | C | District approved correct ammonia slip calculation and correction factor determined by source test | X | |

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|--------------------------------|------------------------------------|--------|-----------------------|---|--------------------------------------|--|---------------------------|------------|----|
| | | | | | | | | Yes | No |
| NH ₃ | BAAQMD condition #20134, part 18.2 | N | | 10 ppmv @ 15% O ₂ , dry, except during turbine startup or shutdown | BAAQMD condition #20134, part 24b | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| Heat input limit | BAAQMD condition #20134, part 22 | Y | | 500 MM BTU/ hr (HHV), 3-hr average | BAAQMD condition #20134, part 23d | C | Fuel meter | X | |
| Heat input limit | BAAQMD condition #20134, part 22 | Y | | 500 MM BTU/ hr (HHV), 3-hr average | BAAQMD condition #20134, part 23d | P/Q | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #20134, part 22 | Y | | 500 MM BTU/ hr (HHV), 3-hr average | BAAQMD condition #20134, part 24g | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| Heat input limit | BAAQMD condition #20134, part 22 | Y | | 12,000 MM BTU/day (HHV) | BAAQMD condition #20134, part 23d | C | fuel meter, calculations | X | |
| Heat input limit | BAAQMD condition #20134, part 22 | Y | | 12,000 MM BTU/day (HHV) | BAAQMD condition #20134, part 31g | P/Q | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #20134, part 22 | Y | | 4,380,000 MM BTU/yr | BAAQMD condition #20134, part 23d | C | fuel meter, calculations | X | |
| Heat input limit | BAAQMD condition #20134, part 22 | Y | | 4,380,000 MM BTU/yr | BAAQMD condition #20134, part 31g | P/Q | Fuel composition analysis | X | |
| MW | N/A | | | None | BAAQMD condition #20134, part 24h | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| Exhaust Gas Temp. | N/A | | | None | BAAQMD condition #20134, part 24j | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| Stack gas flow | N/A | | | None | BAAQMD condition #20134, part 24i | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| NH ₃ injection rate | N/A | | | None | BAAQMD condition #20134, part 24k | P/8000 hrs or 3 yrs whichever comes first. | Source test | X | |
| Start-up Period | BAAQMD condition # 20134, part 19 | | | 60 minutes per start-up | BAAQMD condition # 20134, part 31(b) | P/E | Records | X | |

Facility Name: Lambie Energy Center
 Permit for Facility #: B4415

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|---------------------|-----------------------------------|--------|-----------------------|--|--------------------------------------|------------------------------|-----------------------------|------------|----|
| | | | | | | | | Yes | No |
| Shutdown Period | BAAQMD condition # 20134, part 20 | | | 30 minutes per shutdown | BAAQMD condition # 20134, part 31(b) | P/E | Records | X | |
| Fuel Sulfur Content | 40 CFR 60.333(b) | Y | | 0.8 percent by weight (8000 ppmw) sulfur | 40 CFR 60.334(h)(1) | P | Fuel Sulfur Content Testing | X | |

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S-2 – DIESEL FIREWATER PUMP

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|--------------------|--|--------|-----------------------|---|--|------------------------------|------------------------------|------------|----|
| | | | | | | | | Yes | No |
| SO2 | 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 | None | P/E | Fuel certification by vendor | X | |
| SO2 | SIP 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 | None | P/E | Fuel certification by vendor | X | |
| SO2 | BAAQMD 9-1-304 | Y | | Sulfur content of fuel <0.5% by weight | None | P/E | Fuel certification by vendor | X | |
| SO2 | SIP 9-1-304 | Y | | Sulfur content of fuel <0.5% by weight | None | P/E | Fuel certification by vendor | X | |
| Opacity | BAAQMD Regulation 6-1-303 | N | | ≥ Ringelmann 2 for no more than 3 min/hr | | N | | X | |
| Opacity | SIP Regulation 6-303 | Y | | ≥ Ringelmann 2 for no more than 3 min/hr | | N | | X | |
| FP | BAAQMD 6-1-310 | N | | 0.15 grain/dscf | | N | | X | |
| FP | SIP Regulation 6-310 | Y | | 0.15 grain/dscf | | N | | X | |
| Hours of operation | BAAQMD 9-8-330.1 BAAQMD Condition #22851 Part 2 | N | | Emergency use for an unlimited number of hours | BAAQMD 9-8-530 BAAQMD Condition #22851 Part 3 and 4 | C P/E | Hour meter, recordkeeping | X | |

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|--------------------|--------------------------------|--------|-----------------------|--|--------------------------------------|------------------------------|---------------------------|------------|----|
| | | | | | | | | Yes | No |
| Hours of Operation | BAAQMD Regulation 9-8-330.3 | N | | <= 50 hours each per calendar year for reliability testing, or limitations contained in a District permit, | BAAQMD Regulation 9-8-530 | C P/E | Hour meter, recordkeeping | X | |
| Hours of Operation | BAAQMD Condition 22851, Part 1 | Y | | <= 34 hours/year for reliability-related activities | BAAQMD Condition 22851, Part 3 and 4 | C | Hour meter, recordkeeping | X | |

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-3 – 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 | |
|--------------------|---------------------------|--------|-----------------------|--|---------------------------------|------------------------------|-----------------|------------|----|
| | | | | | | | | Yes | No |
| Opacity | BAAQMD Regulation 6-1-301 | N | | > Ringelmann 1 for no more than 3 min/hr | | N | | X | |
| Opacity | SIP Regulation 6-301 | Y | | ≥ Ringelmann 1 for no more than 3 min/hr | | N | | X | |
| Particulate Weight | BAAQMD Regulation 6-1-310 | N | | 0.15 grains per dscf | | N | | X | |
| Particulate Weight | SIP Regulation 6-310 | Y | | 0.15 grains per dscf | | N | | X | |
| Particulate Weight | BAAQMD Regulation 6-1-311 | Y | | 40 lb/hr | <u>N</u> | <u>N</u> | | X | |
| Particulate Weight | SIP Regulation 6-311 | Y | | 40 lb/hr | <u>N</u> | <u>N</u> | | X | |