

1. RECEIVED IN
ENFORCEMENT: 01/30/2025

Gilroy Energy Center, LLC for Wolfskill Energy Center

2425 Cordelia Road
Fairfield, CA 94534

VIA EMAIL

Wednesday, January 29, 2025

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

Re: Gilroy Energy Center, LLC for Wolfskill Energy Center
Semi-Annual Title V Monitoring and Excess Emissions REVISED Report
Facility #B4511
Reporting Period: July 1, 2024 through December 31, 2024.

Dear Sang,


Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Gilroy Energy Center, LLC for Wolfskill Energy Center (WEC) for the reporting period of July 1, 2024 through December 31, 2024.

WEC is currently in compliance with the District CEMS regulations. However, WEC did not maintain compliance with all the monitoring requirements listed in the Title V permit during this reporting period. Please refer to Appendix A for detailed information regarding the non-compliance events.

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 or Ehab Aqleem, EHS Specialist, at (707) 399-4395.

Sincerely,

Signed by:

5E549D8EAC8C4C3...

Andrew Gundershaug
Plant Manager and Responsible Official

cc:	Sadegh Sadeghipour	Permit Engineer	BAAQMD
	Jamie Wright	O&M Manager	Calpine Corporation
	EHS Walnut Creek	EHS Department	Calpine Corporation

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-1 – COMBUSTION GAS TURBINE
July 1, 2024 through December 31, 2024

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% O2, dry	BAAQMD 9-9-501 and BAAQMD condition #19684, part 23c	C	CEM		X
NOx	SIP 9-9-301.3	Y		9 ppmv @ 15% O2, dry	SIP 9-9-501 and BAAQMD condition #19684, part 23c	C	CEM		X
NOx	BAAQMD 9-9-301.1.3	Y		9 ppmv @ 15% O2, dry	BAAQMD condition #19684, part 24a	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
NOx	SIP 9-9-301.3	Y		9 ppmv @ 15% O2, dry	BAAQMD condition #19684, part 24a	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
NOx	BAAQMD 9-9-301.2	N		0.43 lbs/MWhr or 9 ppmv @ 15% O2, dry	BAAQMD 9-9-501 and BAAQMD condition #19684, part 23c	C	CEM		X
NOx	NSPS, 40 CFR 60 Subpart GG CFR 60.332 (a)(1)	Y		75 ppmv @ 15% O2, dry	NSPS 40 CFR 60.334(b)	C	CEM	X	
NOx	None	Y		None	40 CFR 75.10	C	CEM	X	
NOx	BAAQMD condition #19684, part 18.1	Y		2.5 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, part 18.1	C	CEM	X	
NOx	BAAQMD condition #19684, part 18.1	Y		2.5 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, part 24a	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
NOx	BAAQMD condition #19684, part 21	Y		109 lb/ day (as NO2)	BAAQMD condition #19684, part 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
NOx	BAAQMD condition #19684, part 21	Y		14.7 tons per year (as NO2)	BAAQMD condition #19684, part 23c	C	CEM		X
CO	BAAQMD condition #19684, part 18.3	Y		6 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, parts 18.3 and 23c	C	CEM		X
CO	BAAQMD condition #19684, part 18.3	Y		6 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #19684, part 24c	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
CO	BAAQMD condition #19684, part 21	Y		159 lb/ day	BAAQMD condition #19684, part 23c	C	CEM		X
CO	BAAQMD condition #19684, part 21	Y		21.5 tons per year	BAAQMD condition #19684, part 23c	C	CEM		X
CO2		Y		None	40 CFR 75.10	C	CEM (CO2) or CEM (O2) or fuel flow monitor	X	
SO2	BAAQMD 9-1-301	Y		GLC1 of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD condition #19684, part 23e	N	None	X	
SO2	NSPS 40 CFR 60 Subpart GG60.333(a)	Y		0.015% (vol.) @15% O2 (dry)	NSPS 40 CFR 60.334(h)(3)	N	None	X	
SO2	None	Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measurements, calculations	X	
SO2	BAAQMD condition #19684, part 18.6	Y		1.38 lb/hr	BAAQMD condition #19684, part 23e	P/Q	Fuel gas Total sulfur content analysis	X	
SO2	BAAQMD condition #19684, part 18.6	Y		1.38 lb/hr	BAAQMD condition #19684, part 24f	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X

Facility Name: Wolfskill Energy Center
 Permit for Facility #: B4511

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 condition #19684, part 21	Y		32 lb/ day	BAAQMD condition #19684, part 23e	P/Q	Fuel Gas Total sulfur content analysis	X	
SO2	BAAQMD condition #19684, part 21	Y		4.5 tons/year	BAAQMD condition #19684, part 23e	P/Q	Fuel gas Total sulfur content analysis	X	
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	BAAQMD condition #19684, part 18	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour or equivalent 20% opacity		N		X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		X	
FP	SIP 6-310	Y		0.15 grain/dscf		N		X	
PM10	BAAQMD condition #19684, part 18.5	Y		3 lb/ hr	BAAQMD condition #19684, part 24e	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
PM10	BAAQMD condition #19684, part 21	Y		72 lb/day	BAAQMD condition #19684, parts 23d, 24e	P/A	Source Test every 8,000 hrs or every 3 yrs, whichever comes first		X
PM10	BAAQMD condition #19684, part 21	Y		13.1 tons/year	BAAQMD condition #19684, part 24e	P/A	Source Test every 8,000 hrs or every 3 yrs, whichever comes first		X
POC	BAAQMD condition #19684, part 18.4	Y		2 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, part 24d	C	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
POC	BAAQMD condition #19684, part 18.4	Y		2 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, part 24d	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		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
POC	BAAQMD condition #19684, part 21	Y		31 lb/calendar day	BAAQMD condition #19684, part 24d	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
POC	BAAQMD condition #19684, part 21	Y		4.1 ton/year	BAAQMD condition #19684, part 24d	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
NH3	BAAQMD condition #19684, Part 18.2	N		10 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, parts 18.2 and 23b	C	Calculation based on source test and NH3 to NOx ratio at inlet to SCR		X
NH3	BAAQMD condition #19684, Part 18.2	N		10 ppmv @ 15% O2, dry, except during turbine startup or shutdown	BAAQMD condition #19684, part 24b	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
Heat input limit	BAAQMD condition #19684, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #19684, part 23d	C	Fuel meter, firing monitor	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #19684, part 23d	P/Q	Fuel composition analysis	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #19684, part 24g	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
Heat input limit	BAAQMD condition #19684, part 22	Y		12,000 MM BTU/day (HHV)	BAAQMD condition #19684, part 23d	C	fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		12,000 MM BTU/day (HHV)	BAAQMD condition #19684, part 23d	P/Q	Fuel composition analysis	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		4,380,000 MM BTU/yr (HHV)	BAAQMD condition #19684, part 23d	C	fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #19684, part 22	Y		4,380,000 MM BTU/yr (HHV)	BAAQMD condition #19684, part 24d	P/Q	Fuel composition analysis	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
MW				None	BAAQMD condition #19684, part 24h	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
Exhaust Gas temperature				None	BAAQMD condition #19684, part 24j	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
Stack gas flow rate				None	BAAQMD condition #19684, part 24i	P/A	Source test every 8,000 hrs or every 3 yrs, whichever comes first		X
NH3 injection rate				None	BAAQMD condition #19684, part 24k	P/A	Source test District approved correct ammonia slip calculation and correction factor determined by source test with source. test every 8,000 hrs or every 3 yrs, whichever comes first		X
Start-up Period	BAAQMD condition #19684, part 19	Y		60 minutes per start-up	BAAQMD condition #19684, part 30(b)	P/E	Records	X	
Shutdown Period	BAAQMD condition #19684, part 20	Y		30 minutes per shutdown	BAAQMD condition #19684, part 30(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 – 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 No. 1 for more than 3 min/hr		N		X	
Opacity	SIP Regulation 6-301	Y		< Ringelmann No. 1 for 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	N		40 lb/hr	N	N		X	
Particulate Weight	SIP Regulation 6-311	Y		40 lb/hr	N	N		X	

Initial
RG

APPENDIX A

All Instances of Non-compliance for the Reporting Period

**B4511 - Wolfskill Energy Center - RATA
Delay due to Birds - 1918 Bird Act**

- 10 Day Initial T-V Letter

- 30 Day Follow-up T-V Letter

- 10 Day Response to NOV issued on Dec 6,
2024

Initial
AG

Gilroy Energy Center, LLC for Wolfskill Energy Center

2425 Cordelia Road
Fairfield, CA 94534

VIA EMAIL

July 8, 2024

Director, Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
ATTN: Sang Thao, Title V Reports

**RE: Gilroy Energy Center, LLC for Wolfskill Energy Center, Permit No. 14511
Major Facility Review Permit (Title V Permit)
10-Day Title V Deviation Report**

To Whom it May Concern,

In accordance with the Major Facility Review Permit (Title V Permit) for the Gilroy Energy Center, LLC for Wolfskill Energy Center (the "Facility"), this letter is to advise you of an instance of potential non-compliance as required by Condition I. F, Monitoring Reports of the Title V Permit, which requires the reporting of all non-compliance instances of the Title V Permit in writing within 10 days of discovery of the incident.


As of July 1, 2024, the Facility experienced a deviation from the Relative Accuracy Test Audit (RATA) requirements of Condition VI. 24 of the Title V Permit. The RATA requirements mandate that the Facility complete annual testing during the same calendar quarter every year. The last RATA test was conducted in the second quarter of 2023 (May 2023), meaning that new RATA testing was due to be completed by the end of June 2024. Although this test was scheduled to be performed on June 10, 2024, it was not completed on the scheduled date because there were Raven hatchlings in a bird nest on the stack platform. The test must be postponed until the birds have left the nest as the species is protected under the 1918 Migratory Bird Treaty Act. The Source Test and Compliance & Enforcement divisions were informed of this situation immediately upon discovery.

The testing is now being planned to be conducted in approximately six weeks. The required protocols have been submitted to the District Source Test Section and the test has been issued NST-9350.

Additional information and corrective actions, as necessary, will be provided in the 30-day follow-up correspondence as required by Condition I. F, Monitoring Reports of the Title V Permit.

If you have any questions, don't hesitate to contact me at 707-399-4393 or Ehab Aqleem, EHS Specialist at 646-714-4763.

Sincerely,

DocuSigned by:

5E549D8EAC8C4C3...

Andrew Gundershaug
Responsible Official and General Plant Manager

CC: Sadegh Sadeghipour, Permit Engineer, BAAQMD
 Jamie Wright, O&M Manager, Calpine Corporation
 EHSWalnutCreek@calpine.com, Calpine Corporation
 CICS INC103246

via email attachment
via email attachment
via email attachment

Gilroy Energy Center, LLC for Wolfskill Energy Center

2425 Cordelia Road
Fairfield, CA 94534

VIA EMAIL

July 30, 2024

Director, Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
ATTN: Sang Thao, Title V Reports

**RE: Gilroy Energy Center, LLC for Wolfskill Energy Center, Permit No. 14511
Major Facility Review Permit (Title V Permit)
30-Day Title V Deviation Report**

To Whom it May Concern,

In accordance with the Major Facility Review Permit (Title V Permit) for the Gilroy Energy Center, LLC for Wolfskill Energy Center (the "Facility"), this letter is to provide the 30-day follow-up notification of the potential non-compliance incident reported on June 1, 2024, as required by Condition I. F, Monitoring Reports of the Title V Permit.

Event

The Relative Accuracy Test Audit (RATA), which was scheduled for Q2 2024, was not completed as planned due to the discovery of raven hatchlings in a nest located on the stack platform.

Update

The testing site was promptly isolated to avoid disturbance. As of July 30, 2024, the birds have vacated the nest, and the site has been cleaned and prepared for testing. We are currently coordinating with our Source Test contractor to determine the earliest possible date for rescheduling the test. The Source Test and Compliance & Enforcement divisions will be notified of the updated testing date as soon as it is finalized.

Compliance Status

The deviation remains ongoing at this time. The Facility has operated for 56 hours during this period of deviation. We are making every effort to reschedule the source test and RATA promptly and will provide further updates as necessary. All required protocols have been submitted to the District Source Test Section, and the test has been issued NST-9350.

Certification

As a Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

If you have any questions, don't hesitate to contact me at 707-399-4393 or Ehab Aqleem, EHS Specialist at 646-714-4763.

Sincerely,

Signed by:



5E549D8EAC8C4C3...

Andrew Gundershaug

Responsible Official and General Plant Manager

CC: Sadegh Sadeghipour, Permit Engineer, BAAQMD
Jamie Wright, O&M Manager, Calpine Corporation
EHSWalnutCreek@calpine.com, Calpine Corporation
CICS INC103246

via email attachment
via email attachment
via email attachment

Gilroy Energy Center, LLC for Wolfskill Energy Center

2425 Cordelia Road
Fairfield, CA 94534

VIA EMAIL

December 13, 2024

Director, Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
ATTN: Sang Thao, Title V Reports

**RE: Gilroy Energy Center, LLC for Wolfskill Energy Center, Permit No. 14511
Major Facility Review Permit (Title V Permit)
Notice of Violation No. A63980 10-Day Response**

To Whom it May Concern,

We acknowledge receipt of Notice of Violation (NOV) No. A63980, issued to Gilroy Energy Center, LLC for the Wolfskill Energy Center ("Facility") by the Bay Area Air Quality Management District ("District") on December 6, 2024. This letter serves as our formal 10-day response, as required, and includes relevant details regarding the incident and subsequent actions taken.

Event

On December 6, 2024, the Facility was notified by an inspector that the Relative Accuracy Test Audit (RATA), scheduled for Q2 2024, was not completed within the required timeline, as outlined in 40 CFR Part 60.

The delay occurred due to the discovery of raven hatchlings in a nest located on the stack platform. As the ravens are a species protected under the 1918 Migratory Bird Treaty Act, testing was postponed to avoid disturbing the birds. Upon discovery, the Facility promptly notified the District's Source Test and Compliance & Enforcement divisions and isolated the testing area to ensure compliance with federal protections.

The nest was vacated by July 30, 2024, at which time the site was cleaned and prepared for testing.

Compliance Status


The deviation has been fully resolved. The source test and RATA were completed on September 26, 2024. The final report was prepared and finalized on November 14, 2024, and submitted to the District on November 25, 2024, under NST-9350.

Certification

As a Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

If you have any questions, don't hesitate to contact me at 707-399-4393 or Ehab Aqleem, EHS Specialist at 646-714-4763.

Sincerely,

Signed by:

5E549D8EAC8C4C3...
Andrew Gundershaug
Responsible Official and General Plant Manager

CC: Sadeqh Sadeghipour, Permit Engineer, BAAQMD
Jamie Wright, O&M Manager, Calpine Corporation
EHSWalnutCreek@calpine.com, Calpine Corporation
CICS INC103246

via email attachment
via email attachment
via email attachment



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A63980**

ISSUED TO: Wolfskill Energy CTR P G N# 14511
 ADDRESS: 2425 Cordelia Road
 CITY: Fairfield STATE: Ca ZIP: 94534
 PHONE: (707) 399-4393
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 1 NAME: Combustion Gas Turbine
 EMISSION PT: P# _____ NAME: _____
 DATE: 7/1/2024 TIME: 12:00 AM HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input type="checkbox"/> REG 2 RULE ___ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input checked="" type="checkbox"/> REG _____ RULE _____ SECTION <u>40 CFR Part 60</u> CODE <input type="text"/>	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE <input type="text"/>	

Details: The Relative Accuracy Test Audit (RATA), scheduled for Q2 2024, was not completed as planned.

RECIPIENT NAME: Andrew Gundershaug
 TITLE: Plant Manager

SIGNING THIS NOTICE IS NOT
AN ADMISSION OF GUILT

Signed by: Andrew Gundershaug 12/13/2024 | 5:16 PM CST
 X 3E349D8EAC8C4C3...

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Cristobal Frias INSP # 920
 DATE: 12/06/24 TIME: 13:00 HRS MAILED

PLEASE PRESS HARD

Continued On Reverse

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

**B4511 - Wolfskill Energy Center - RATA Results failed
to meet Accuracy Specifications**

- 10 Day Initial T-V Letter
- 30 Day Follow-up T-V Letter

Initial
RG

Gilroy Energy Center, LLC for Wolfskill Energy Center

2425 Cordelia Road
Fairfield, CA 94534

VIA EMAIL

November 21, 2024

Director, Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
ATTN: Cristobal Frias, Title V Reports

**RE: Gilroy Energy Center, LLC for Wolfskill Energy Center, Permit No. 14511
 Major Facility Review Permit (Title V Permit)
 10-Day Title V Deviation Report**

To Whom it May Concern,

In accordance with the Major Facility Review Permit (Title V Permit) for the Gilroy Energy Center, LLC for Wolfskill Energy Center (the "Facility"), this letter is to advise you of an instance of potential non-compliance as required by Condition I. F, Monitoring Reports of the Title V Permit, which requires the reporting of all non-compliance instances of the Title V Permit in writing within 10 days of discovery of the incident.

As of November 14, 2024, the Facility experienced a deviation from 40 CFR 60.13 or BAAQMD Regulation 1-522.6 requirements of the Title V permit during the Relative Accuracy Test Audit (RATA). Preliminary results from the RATA conducted on September 25, 2024, indicated that the NO_x analyzer did not meet the accuracy specifications or demonstrate compliance with performance standards outlined in these regulations. The unit was not dispatched, and a follow-up RATA was conducted on September 26, 2024, for the NO_x and O₂ analyzers and their combination. The results of the second audit confirmed that the CEMS met all required performance specifications. Both sets of RATA results will be included in the submitted report for reference.

The investigation of this event is ongoing. Additional information and corrective actions, as necessary, will be provided in the 30-day follow-up correspondence as required by Condition I. F, Monitoring Reports of the Title V Permit.

If you have any questions, please don't hesitate to contact me at 707-399-4393 or Ehab Aqleem, EHS Specialist at 646-714-4763.

Sincerely,

Signed by:



5E549D8EAC8C4C3...

Andrew Gundershaug
Responsible Official and General Plant Manager

CC: Sadegh Sadeghipour, Permit Engineer, BAAQMD
 Sang Thao, Permit Inspector, BAAQMD
 Jamie Wright, O&M Manager, Calpine Corporation
 EHSWalnutCreek@calpine.com, Calpine Corporation
 CICS INC103498

via email attachment
via email attachment
via email attachment
via email attachment

Gilroy Energy Center, LLC for Wolfskill Energy Center

2425 Cordelia Road
Fairfield, CA 94534

VIA EMAIL

December 12, 2024

Director, Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
ATTN: Sang Thao, Title V Reports

**RE: Gilroy Energy Center, LLC for Wolfskill Energy Center, Permit No. 14511
Major Facility Review Permit (Title V Permit)
30-Day Title V Deviation Report**

To Whom it May Concern,

In accordance with the Major Facility Review Permit (“Title V Permit”) for the Gilroy Energy Center, LLC for Wolfskill Energy Center (the “Facility”), this letter is intended to satisfy the 30-day follow-up reporting requirement as required by Section I.F. of the Title V Permit, which requires the reporting of all non-compliance instances of the Title V Permit in writing within 30 days of discovery of such non-compliance.

A Title V 10-day deviation notification was submitted to the District on November 22, 2024.

Event Description

Preliminary analysis of the annual relative accuracy audit (RATA) testing conducted September 25, 2024 indicated that the NO_x analyzer did not meet the analyzer accuracy specifications of 40 CFR 60.13 or BAAQMD Regulation 1-522.6. Based on the preliminary analysis, a second RATA was conducted on September 26, 2024, and that test satisfied the RATA specification requirements. The facility received the final test report for both tests on November 14, 2024, and it was submitted to BAAQMD on November 25, 2024.

As a result of the failed initial QA test, NO_x and ammonia slip emissions data from the hour when the initial RATA failed to the hour when a subsequent RATA passed have been invalidated.

Corrective Actions

The NO_x and O₂ analyzers were recalibrated after the September 25 testing.

Compliance Status

The failed RATA did not result in any emissions exceedances, and the facility is currently in compliance with all permit conditions. The NO_x analyzer was verified to meet performance standards during the successful follow-up RATA on September 26, 2024.

Investigation and Cause Determination

The failed RATA on September 25, 2024 is suspected to have been caused by exhaust stratification within the stack.

Director, Compliance and Enforcement

December 12, 2024

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Preventive Actions

To prevent recurrence, the Facility plans to conduct stack stratification studies and implement any necessary adjustments to minimize stratification. The Facility is actively coordinating with the vendor to finalize a testing schedule, targeted for completion in Q1 2025.

Certification

As the Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

If you have any questions or require additional information, please contact me at (707) 399-4393 or Ehab Aqleem, EHS Specialist, at (646) 714-4763.

Sincerely,

Signed by:



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Andrew Gundershaug

Responsible Official and General Plant Manager

CC:

Sadegh Sadeghipour, Permit Engineer, BAAQMD
Sang Thao, Permit Inspector, BAAQMD
Jamie Wright, O&M Manager, Calpine Corporation
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