Gilroy Energy Center, LLC (for the Wolfskill Energy Center)

2425 Cordelia Road
Fairfield, CA 94533

July 13, 2021

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 #: 254

1. ☐ RECEIVED IN ENFORCEMENT: 07/14/2021

Subject: Gilroy Energy Center, LLC for the Wolfskill Energy Center
Title V Semi-Annual Monitoring Report
Facility # B4511
Reporting Period: January 1, 2021 through June 30, 2021

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Wolfskill Energy Center ("WEC") for the reporting period from January 1, 2021 through June 30, 2021.

WEC is currently in compliance with the District CEMS regulations. WEC maintained compliance with the monitoring requirements listed in the Title V permit for WEC 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) 399-4395.

Sincerely,

Andrew Gundershaug
Plant Manager and Designated Representative/Responsible Official

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-2 – COMBUSTION GAS TURBINE
January 1, 2021 through June 30,2021

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% 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	
NOx	BAAQMD condition #19684, part 21	Y		14.7 tons per year (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
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 measure-ments, 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	
SO2	BAAQMD condition #19684, part 21	Y		32 lb/ day	BAAQMD condition #19684, part 23e	P/Q	Fuel Gas Total sulfur content 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
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 tempe-rature				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	