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

795 Minaker Road
Antioch, CA 94509

January 3, 2020

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

Subject: Gilroy Energy Center, LLC for the Riverview Energy Center
Title V Semi-Annual Monitoring Report
Facility # B4512
Reporting Period: July 1, 2019 – December 31, 2019

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Riverview Energy Center ("REC") for the reporting period from July 1, 2019 – December 31, 2019.

REC is currently in compliance with the District CEMS regulations. REC maintained compliance with the monitoring requirements listed in the Title V permit for REC 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,

Andy Gundershaug

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, 2019 through December 31, 2019

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 #20010, part 23c	C	CEM	X	
NOx	SIP 9-9-301.3	Y		9 ppmv @ 15% O2, dry	SIP 9-9-501 and BAAQMD condition #20010, part 23c	C	CEM	X	
NOx	BAAQMD 9-9-301.1.3	N		9 ppmv @ 15% O2, dry	BAAQMD condition #20010, part 4a	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
NOx	SIP Regulation 9-9-301.3	Y		9 ppmv @ 15% O2, dry	SIP Regulation condition #20010, part 24a	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
NOx	NSPS, 40 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 #20010, part 18(a)	Y		2.5 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 18(a), 23c	C	CEM	X	
NOx	BAAQMD condition #20010, part 18(a)	Y		2.5 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24a	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
NOx	BAAQMD condition #20010, part 21	Y		121 lb/ day (as NO2)	BAAQMD condition #20010, part 23c	C	CEM	X	
NOx	BAAQMD condition #20010, part 21	Y		14.7 tons per year (as NO2)	BAAQMD condition #20010, 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 #20010, part 18(c)	Y		6 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, parts 18(c) and 23c	C	CEM	X	
CO	BAAQMD condition #20010, part 18(c)	Y		6 ppmv @ 15% O2, dry, 3-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24c	P/ Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
CO	BAAQMD condition #20010, part 21	Y		163 lb/ day	BAAQMD condition #20010, part 23c	C	CEM	X	
CO	BAAQMD condition #20010, part 21	Y		21.5 tons per year	BAAQMD condition #20010, 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		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	
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		N		X	
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD condition #20010, part 23e	P/Q	Fuel Gas Total sulfur content analysis	X	
SO2	SIP 9-1-302	Y		300 ppm (dry)	BAAQMD condition #20010, part 23e	P/Q	Fuel Gas Total sulfur content analysis	X	
SO2	NSPS 40 CFR 60.333(a)	Y		0.015% (vol.) @15% O_2 (dry)	NSPS 40 CFR 60.334(h)(3), 40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3, and BAAQMD Condition 20010, Part 23e	P/Q	Fuel Gas Total sulfur content analysis, Fuel measure-ments, calculations	X	
SO2	None	Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measure-ments, calculations	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 #20010, part 18(f)	Y		1.38 lb/hr	BAAQMD condition #20010, part 23e	P/Q	Fuel gas Total sulfur content analysis	X	
SO2	BAAQMD condition #20010, part 18(f)	Y		1.38 lb/hr	BAAQMD condition #20010, part 24f	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
SO2	BAAQMD condition #20010, part 21	Y		32 lb/ day	BAAQMD	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
					condition			X	
					#20010, part 24f			X	
SO2	BAAQMD condition #20010, part 21	Y		4.5 tons/year	BAAQMD	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
					condition			X	
					#20010, part 24f			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 #20010, 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 Regulation 6-310	Y		0.15 grain/dscf		N		X	
PM10	BAAQMD condition #20010, part 18(e)	Y		3 lb/ hr	BAAQMD condition #20010, part 24e	P/Once every 8,000 operating hours or three years, 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
PM10	BAAQMD condition #20010, part 21	Y		72 lb/day	BAAQMD condition #20010, parts 23d, 24e	P/Once every 8,000 operating hours or three years, whichever comes first	Source Test	X	
PM10	BAAQMD condition #20010, part 21	Y		9.8 tons/year	BAAQMD condition #20010, part 24e	P/Once every 8,000 operating hours or three years, whichever comes first	Source Test	X	
POC	BAAQMD condition #20010, part 18(d)	Y		2 ppmv @ 15% O2, dry, 1-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24d	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
POC	BAAQMD condition #20010, part 18(d)	Y		2 ppmv @ 15% O2, dry, 1-hr average except during turbine startup or shutdown	BAAQMD condition #20010, part 24d	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
POC	BAAQMD condition #20010, part 21	Y		31 lb/calendar day	BAAQMD condition #20010, part 24d	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
POC	BAAQMD condition #20010, part 21	Y		4.1 ton/year	BAAQMD condition #20010, part 24d	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
NH3	BAAQMD condition #20010, Part 18(b)	N		10 ppmv @ 15% O2, dry, averaged over 1 hr except during turbine startup or shutdown	BAAQMD condition #20010, 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
NH3	BAAQMD condition #20010, Part 18(b)	N		10 ppmv @ 15% O2, dry, averaged over 1 hr except during turbine startup or shutdown	BAAQMD condition #20010, part 24b	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #20010, part 23d	C	Fuel meter, firing monitor	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #20010, part 23d	P/Q	Fuel composition analysis	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		500 MM BTU/hr (HHV)	BAAQMD condition #20010, part 24g	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		12,000 MM BTU/day (HHV)	BAAQMD condition #20010, part 23d	C	fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		12,000 MM BTU/day (HHV)	BAAQMD condition #20010, part 23d	P/Q	Fuel composition analysis	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		3,250,000 MM BTU/yr (HHV)	BAAQMD condition #20010, part 23d	C	fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #20010, part 22	Y		3,250,000 MM BTU/yr (HHV)	BAAQMD condition #20010, part 31g	P/Q	Fuel composition analysis	X	
MW				None	BAAQMD condition #20010, part 24h	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
Exhaust Gas tempe-rature				None	BAAQMD condition #20010, part 24j	P/Once every 8,000 operating hours or three years, 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
Stack gas flow rate				None	BAAQMD condition #20010, part 24i	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
NH3 injection rate				None	BAAQMD condition #20010, part 24k	P/Once every 8,000 operating hours or three years, whichever comes first	Source test	X	
Start-up Period	BAAQMD condition #20010, part 19			60 minutes per start-up	BAAQMD condition #20010, part 29(b)	P/E	Records	X	
Shutdown Period	BAAQMD condition #20010, part 20			30 minutes per shutdown	BAAQMD condition #20010, part 29(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 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	N	N		X	
Particulate Weight	SIP Regulation 6-311	Y		40 lb/hr	N	N		X	