

1.  RECEIVED IN ENFORCEMENT: 09/25/2024

**Gilroy Energy Center, LLC for Riverview Energy Center**

795 Minaker Drive  
Antioch, CA 94509

**VIA EMAIL**

Tuesday, September 24, 2024

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 Riverview Energy Center  
Semi-Annual Title V Monitoring and Excess Emissions REVISED Report  
Facility #B4512  
Reporting Period: January 1, 2024 through June 30, 2024.

Dear Andrew,


Enclosed is the Title V CEMS Semi-Annual Monitoring REVISED Report for the Gilroy Energy Center, LLC for Riverview Energy Center (REC) for the reporting period of January 1, 2024 through June 30, 2024.

REC is currently in compliance with the District CEMS regulations. However, REC 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:  
  
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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**  
**January 1, 2024 through June 30, 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 #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% O <sub>2</sub> , 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% O <sub>2</sub> , 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	
CO <sub>2</sub>		Y		None	40 CFR 75.10	C	CEM (CO <sub>2</sub> ) or CEM (O <sub>2</sub> ) or fuel flow monitor	X	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sub>1</sub> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
SO <sub>2</sub>	SIP 9-1-301	Y		GLC <sub>1</sub> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
SO <sub>2</sub>	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD condition #20010, part 23e	P/Q	Fuel Gas Total sulfur content analysis	X	
SO <sub>2</sub>	SIP 9-1-302	Y		300 ppm (dry)	BAAQMD condition #20010, part 23e	P/Q	Fuel Gas Total sulfur content analysis	X	
SO <sub>2</sub>	NSPS 40 CFR 60.333(a)	Y		0.015% (vol.) @ 15% O <sub>2</sub> (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 measurements, calculations	X	
SO <sub>2</sub>	None	Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measurements, calculations	X	

Facility Name: Riverview Energy Center  
 Permit for Facility #: B4512

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

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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% O <sub>2</sub> , 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% O <sub>2</sub> , 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% O <sub>2</sub> , 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

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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 temperature				None	BAAQMD condition #20010, part 24j	P/Once every 8,000 operating hours or three years, whichever comes first	Source test		X

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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	

# APPENDIX A

All Instances of Non-compliance for the Reporting Period

# Gilroy Energy Center, LLC for Riverview Energy Center

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2425 Cordelia Rd  
Fairfield, CA 94543

## VIA EMAIL

June 28, 2024

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

**RE:                Gilroy Energy Center, LLC for Riverview Energy Center, Permit No. 14512  
                     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 Riverview Energy Center (the "Facility"), this letter is to follow up on an instance of potential non-compliance as required by Condition I. F, Monitoring Reports of the Title V Permit, which requires the follow-up reporting of all non-compliance instances of the Title V Permit in writing within 30 days of discovery of the incident.

### Event

Source testing, which was due in May 2024, was not completed as scheduled due to the unexpected passing of the contractor responsible for the testing.

### Corrective Action

Source test was successfully completed on June 22, 2024, using the submitted protocol under NST-9351.

### Compliance Status

The Facility is in compliance with the Source Testing requirements of the Title V Permit and all other conditions.

### 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,

DocuSigned by:



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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 INC103248

via email attachment  
via email attachment  
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