



**Marsh Landing LLC**  
Marsh Landing Generating Station  
3201 Wilbur Avenue  
P.O. Box 1687  
Antioch, CA 94509

January 28, 2026

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

TV Tracking #1310 (Semi-Annual)

1.  RECEIVED IN  
ENFORCEMENT: 01/29/2026

**Marsh Landing Generating Station (Plant #B9169) Semi-Annual Title V Monitoring Report and Compliance Certification, July 1, 2025 through December 31, 2025**

Dear Mr. Gove:

Marsh Landing LLC submits the Semi-Annual Title V Monitoring Report and Compliance Certification for Marsh Landing Generating Station (Plant #B9169) for July 1, 2025 through December 31, 2025.

Please contact George Piantka at [george.piantka@nrg.com](mailto:george.piantka@nrg.com) or (760) 707-6833 if you have any questions.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Joseph Moura  
Plant Manager  
Marsh Landing Generating Station

cc: Lily Law, BAAD  
EPA Region 9, Director of Air Division  
Dr. Anwar Ali, CEC

Attachments

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# COMPLIANCE CERTIFICATION

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Based on information and belief formed after reasonable inquiry, the statements and information in the attached Semi-Annual Monitoring Report are true, accurate, and complete.

Certification Period: July 1, 2025 – December 31, 2025

Facility: Facility #B9169  
Marsh Landing LLC  
Marsh Landing Generating Station  
3201-C Wilbur Ave.  
Antioch, CA 94509

Name of Responsible Official: Joseph Moura

Signature:



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Date:

1/28/26

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**Marsh Landing Generating Station  
Title V Compliance Tables Table VII – A & B  
Applicable Limits and Compliance Monitoring Requirements  
July 1 to December 31, 2025**

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
NOx	BAAQMD 9-9-301.1.3	N		9 ppmv @ 15% O <sub>2</sub> , dry	BAAQMD 9-9-501 and BAAQMD condition #24732 Parts 24 and 28	C P/A	CEM Annual source test	C	
NOx	BAAQMD 9-9-301.2	N		0.15 lbs/MWhr or 5 ppmv @ 15% O <sub>2</sub> , dry	BAAQMD 9-9-501 and BAAQMD condition #24732 Parts 24 and 28	C P/A	CEM Annual source test	C	
NOx	SIP 9-9-301.3	Y		9 ppmv @ 15% O <sub>2</sub> , dry	BAAQMD 9-9-501 and BAAQMD condition #24732 Parts 24 and 28	C P/A	CEM Annual source test	C	
NOx	NSPS Subpart K K K K 40 CFR 60.4320(a)	Y		15 ppmv @ 15% O <sub>2</sub> , dry 4-hour rolling average for turbines at or above 75% of peak load	NSPS 40 CFR 60.4340(b)(1)	C	CEM	C	
NOx	NSPS Subpart K K K K 40 CFR 60.4320(a)	Y		96 ppmv @ 15% O <sub>2</sub> , dry 4-hour rolling average for turbines operating below 75% of peak load	NSPS 40 CFR 60.4340(b)(1)	C	CEM	C	
NOx	None	Y		None	40 CFR 75.10	C	CEM	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
NOx	BAAQMD condition #24732 Part 17a	Y		20.83 lb per hour or 0.00946 lb/MMBTU (measured as NO <sub>2</sub> )	BAAQMD condition #24732 Parts 24 and 28	C P/A	CEM Annual source test	C	
NOx	BAAQMD condition #24732 Part 17b	Y		2.5 ppmv @ 15% O <sub>2</sub> , dry, Averaged over one hour except during transient hours when a 3-hr average is applied	BAAQMD condition #24732 Parts 24 and 28	C P/A	CEM Annual source test	C	
NOx	BAAQMD condition #24732 Part 18	Y		36.4 lb per startup, 45.1 lb/hr containing a startup, and 15.1 lb per shutdown (Not applicable during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations)	BAAQMD condition #24732 Part 24	C	CEM	C	
NOx	BAAQMD condition #24732 Part 19	Y		80 lb/hr during combustor tuning (as NO <sub>2</sub> )	BAAQMD condition #24732 Part 24	C	CEM	C	

**Table VII - A**  
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**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
NOx	BAAQMD condition #24732 Part 20a	Y		2,468 lb combined from S-1, S-2, S-3, and S-4 per any calendar day (except days when tuning occurs, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations) (as NO <sub>2</sub> )	BAAQMD condition #24732 Part 24	C	CEM	C	
NOx	BAAQMD condition #24732 Part 21a	Y		2,941 lb combined from S-1, S-2, S-3, and S-4 per any calendar day (as NO <sub>2</sub> ), excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 24	C	CEM	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
NOx	BAAQMD condition #24732 Part 22a	Y		78.57 tons combined from S-1, S-2, S-3, and S-4 per consecutive twelve-month period (as NO <sub>2</sub> ), excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 24	C	CEM	C	
NOx	BAAQMD condition #24732 Part 42	Y		3,311 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Part 43	P/E	CEM, records, calculations	C	
NOx	BAAQMD condition #24732 Part 44(a)	Y		8,048 lb/day from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	C	
NOx	BAAQMD condition #24732 Part 45(a)	Y		414 lb/year from readiness testing for black start capability at S-3 and S-4 combined	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
NOx	BAAQMD condition #24732 Part 46(a)	Y		16,283 lb/year from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	C	
CO	BAAQMD condition #24732 Part 17c	Y		10.0 lb/hr or 0.00454 lb/MMBTU at each exhaust point P-1, P-2, P-3, or P-4	BAAQMD condition #24732 Parts 24 and 28	C P/A	CEM Annual source test	C	
CO	BAAQMD condition #24732 Part 17d	Y		2.0 ppmv @ 15% O <sub>2</sub> , dry, Averaged over any 1-hour	BAAQMD condition #24732 Parts 24 and 28	C P/A	CEM Annual source test	C	
CO	BAAQMD condition #24732 Part 18	Y		216.2 lb per startup, 541.3 lb/hr containing a startup, and 111.5 lb per shutdown (Not applicable during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations)	BAAQMD condition #24732 Part 24	C	CEM	C	

**Table VII - A**  
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**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
CO	BAAQMD condition #24732 Part 19	Y		450 lb/hr during combustor tuning	BAAQMD condition #24732 Part 24	C	CEM	C	
CO	BAAQMD condition #24732 Part 20b	Y		4,858 lb combined from S-1, S-2, S-3, and S-4 per any calendar day (except days when tuning occurs, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 24	C	CEM	C	
CO	BAAQMD condition #24732 Part 21b	Y		8,378 lb combined from S-1, S-2, S-3, and S-4 per any calendar day, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 24	C	CEM	C	

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**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
CO	BAAQMD condition #24732 Part 22b	Y		138.57 tons combined from S-1, S-2, S-3, and S-4 per consecutive twelve-month period, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 24	C	CEM	C	
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	C	
CO	BAAQMD condition #24732 Part 42	Y		103,486 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Part 43	P/E	CEM, records, calculations	C	
CO	BAAQMD condition #24732 Part 44(b)	Y		100,673 lb/day from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
CO	BAAQMD condition #24732 Part 45(a)	Y		12,936 lb/year from readiness testing for black start capability at S-3 and S-4 combined	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	C	
CO	BAAQMD condition #24732 Part 46(a)	Y		212,725 lb/year from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	C	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		C	
SO <sub>2</sub>	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD condition #24732 Part 11	P/M	Total sulfur analysis	C	
SO <sub>2</sub>	NSPS Subpart KKKK 40 CFR 60.4330(a) (2)	Y		0.060 lb SO <sub>2</sub> /MMBtu	NSPS 40 CFR 60.4365(a)	N	None	C	
SO <sub>2</sub>	None	Y		None	40 CFR 75.11(d)(2), 40 CFR 75, Appendix D, Part 2.3		Fuel measurements, calculations	C	

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**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
SO <sub>2</sub>	BAAQMD condition #24732 Part 11	Y		Fire exclusively natural gas with 1 grain sulfur per 100 scf	BAAQMD condition #24732 Part 11	P/M	Total sulfur analysis	C	
SO <sub>2</sub>	BAAQMD condition #24732 Part 17g	Y		6.21 lb/hr	BAAQMD condition #24732 Parts 24, 25, and 28	P/D P/A	Record keeping, District approved calculation, Annual source test	C	
SO <sub>2</sub>	BAAQMD condition #24732 Part 20e	Y		596 lb combined from S-1, S-2, S-3, and S-4 per calendar day, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 25	P/D	Record keeping, District approved calculation	C	

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**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
SO <sub>2</sub>	BAAQMD condition #24732 Part 21e	Y		596 lb combined from S-1, S-2, S-3, and S-4 per calendar day, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 28	P/D	Record keeping, District approved calculation	C	
SO <sub>2</sub>	BAAQMD condition #24732 Part 22e	Y		4.94 tons/consecutive twelve-month period, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 28	P/D	Record keeping, District approved calculation	C	
SO <sub>2</sub>	BAAQMD condition #24732 Part 42	Y		84 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Part 43	P/E	Records, calculations	C	
SO <sub>2</sub>	BAAQMD condition #24732 Part 44(e)	Y		174 lb/day from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	

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**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
SO <sub>2</sub>	BAAQMD condition #24732 Part 45(e)	Y		10 lb/year from readiness testing for black start capability at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	
SO <sub>2</sub>	BAAQMD condition #24732 Part 46(e)	Y		354 lb/year from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		C	
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		C	
Filterable Particulate	BAAQMD 6-1-310	N		0.15 grain/dscf		N		C	
FP	SIP 6-310	Y		0.15 grain/dscf		N		C	
PM <sub>10</sub>	BAAQMD condition #24732 Part 17h	Y		9.0 lb/ hr	BAAQMD condition #24732 Part 28	P/A	Triennial source test	C	

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**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
PM <sub>10</sub>	BAAQMD condition #24732 Part 20d	Y		864 lb/calendar day, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 25	P/D	Record keeping, District approved calculation	C	
PM <sub>10</sub>	BAAQMD condition #24732 Part 21d	Y		864 lb/calendar day, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 25	P/D	Record keeping, District approved calculation	C	
PM <sub>10</sub>	BAAQMD condition #24732 Part 22d	Y		31.54 tons/consecutive twelve-month period, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 28	P/A	Triennial source test, District approved calculation	C	
PM <sub>10</sub>	BAAQMD condition #24732 Part 42	Y		123 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Part 43	P/E	Records, calculations	C	

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**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
PM <sub>10</sub>	BAAQMD condition #24732 Part 44(d)	Y		255 lb/day from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	
PM <sub>10</sub>	BAAQMD condition #24732 Part 45(d)	Y		15 lb/year from readiness testing for black start capability at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	
PM <sub>10</sub>	BAAQMD condition #24732 Part 46(d)	Y		518 lb/year from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	
TSP	BAAQMD condition #24732 Part 17i	Y		9.0 lb TSP per hour from each exhaust point P-1, P-2, P-3, or P-4	BAAQMD condition #24732 Parts 25 and 28	P/D	Record Keeping, Annual source test, District approved calculation	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
POC	BAAQMD condition #24732 Part 17f	Y		2.9 lb/hr	BAAQMD condition #24732 Part 28	P/A	Triennial source test	C	
POC	BAAQMD condition #24732 Part 18	Y		11.9 lb per startup, 28.5 lb/hr containing a startup, and 5.4 lb per shutdown (Not applicable during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations)	Initial Test condition #24772 Part 10	none	Record Keeping, District approved emission factor	C	
POC	BAAQMD condition #24732 Part 19	Y		30 lb/hr during combustor tuning	none	none	District approved emission factor (permit limit), Record Keeping	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
POC	BAAQMD condition #24732 Part 20c	Y		476 lb combined from S-1, S-2, S-3, and S-4 per calendar day (except days when tuning occurs, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations)	BAAQMD condition #24732 Part 25	P/D	Record Keeping	C	
POC	BAAQMD condition #24732 Part 21c	Y		693 lb combined from S-1, S-2, S-3, and S-4 per calendar day, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 25	P/D	Record Keeping	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
POC	BAAQMD condition #24732 Part 22c	Y		14.21 ton combined from S-1, S-2, S-3, and S-4 per consecutive twelve-month period year, excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 25	P/D	Record Keeping	C	
POC	BAAQMD condition #24732 Part 42	Y		8,089 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Part 43	P/E	Records, calculations	C	
POC	BAAQMD condition #24732 Part 44(c)	Y		7,422 lb/day from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	
POC	BAAQMD condition #24732 Part 45(c)	Y		1,011 lb/year from readiness testing for black start capability at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	

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**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
POC	BAAQMD condition #24732 Part 46(c)	Y		15,750 lb/year from readiness testing for black start capability and black start emergency operations at S-3 and S-4 combined	BAAQMD condition #24732 Part 25	P/E	Records, calculations	C	
NH <sub>3</sub>	BAAQMD condition #24732 Part 17e	N		10 ppmv @ 15% O <sub>2</sub> , dry, except during turbine startup, combustor tuning operation, or shutdown	BAAQMD condition #24732 Parts 17e and 27	C P/A	District approved calculation Source test	C	
Heat input limit	BAAQMD condition #24732 Part 12	Y		2,202 MMBTU/hr (HHV)	BAAQMD condition #24732 Part 24	C	Fuel meter	C	
Heat input limit	BAAQMD condition #24732 Part 13	Y		52,848 MMBTU/day (HHV)	BAAQMD condition #24732 Part 24	C	Fuel meter, calculations	C	
Heat input limit	BAAQMD condition #24732 Part 14	Y		13,994,976 MMBTU/yr (HHV) (excluding heat input rate during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations)	BAAQMD condition #24732 Part 24	C	Fuel meter, calculations	C	

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES**

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 (C/I)	No
Hours of Operation	BAAQMD condition #24732 Part 15	Y		7,008 combined hours for S-1, S-2, S-3, and S-4 per year excluding maintenance, tuning, testing, readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations	BAAQMD condition #24732 Part 36	P/D	Record Keeping	C	
Hours of Operation	BAAQMD condition #24732 Part 41	Y		64 combined hours for commissioning activities for black start capability at S-3 and S-4	BAAQMD condition #24732 Part 43	P/D	Record Keeping	C	

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-7 STANDBY DIESEL ENGINE GENERATOR SET**  
**S-8 EMERGENCY STANDBY DIESEL FIRE PUMP ENGINE**

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 6-1-303.1	Y		>Ringelmann No.2 for no more than 3 minutes in any hour		N		C	
Opacity	SIP Regulation 6-1-303.1	Y		>Ringelmann No.2 for no more than 3 minutes in any hour		N		C	
FP	BAAQMD 6-1-310	Y		0.15 gr/dscf Particulate Weight Limitation		N		C	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		C	
SO <sub>2</sub>	BAAQMD 9-1-301	N		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		C	
SO <sub>2</sub>	BAAQMD 9-1-304	Y		0.5% sulfur in fuel by weight		N		C	
Hours of operation	BAAQMD Regulation 9-8-330.1	N		Emergency use for an unlimited number of hours	BAAQMD Regulation 9-8-530	P/E	Records	C	

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-7 STANDBY DIESEL ENGINE GENERATOR SET**  
**S-8 EMERGENCY STANDBY DIESEL FIRE PUMP ENGINE**

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 condition #22850 Part 1	N		Reliability related activities less than 50 hr/yr	BAAQMD condition #22850 Parts 4a, 4b, 4c	C P/E	Records	C	

**Marsh Landing Generating Station  
Major Facility Review Permit Deviation Summary  
July 1 to December 31, 2025**

## Marsh Landing Generating Station Major Facility Review Permit Deviation Summary

**July 1, 2025 – December 31, 2025**

Deviation Item No.	Permitted Source	Requirement or Limit	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken
			Start		End				
			Date	Time	Date	Time			
NA									

No deviations occurred during the second semi-annual period 2025. Marsh Landing conducted retesting of biennial toxics in December 2025 since the September 2025 results were invalid based on contamination in laboratory QA/QC samples and sample blanks.