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

July 29, 2019

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

1. ☐ RECEIVED IN ENFORCEMENT: (via email) 7/30/19 site: B9169 ; 874/LD

Semi-Annual Title V Monitoring Report and Compliance Certification for Marsh Landing LLC, Marsh Landing Generating Station (Plant #19169) for January 1, 2019 through June 30, 2019

Dear Sir:

Please find enclosed the Semi-Annual Title V Monitoring Report and Compliance Certification for Marsh Landing LLC, Marsh Landing Generating Station (Plant #19169) for January 1, 2019 through June 30, 2019.

If you have any questions regarding the content of this report, please contact Scott Seipel at scott.seipel@nrg.com or (909) 648-5008.

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
PlantManager
Marsh Landing Generating Station

Attachments

COMPLIANCE CERTIFICATION

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:	January 1, 2019 – June 30, 2019
Facility:	Plant #19169 Marsh Landing LLC Marsh Landing Generating Station 3201-C Wilbur Ave. Antioch, CA 94509
Name of Responsible Official:	Joseph Moura
Signature:	
Date:	7/29/19

Marsh Landing Generating Station Major Facility Review Permit Deviation Summary

January 1, 2019 – June 30, 2019

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			

No deviations occurred for the reporting period.

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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 #24732, Parts 24 and 28	C P/A	CEM Annual source test	Yes	
NOx	BAAQMD 9-9-301.2	N		0.15 lbs/MWhr or 5 ppmv @ 15% O2, dry	BAAQMD 9-9-501 and BAAQMD condition #24732, Parts 24 and 28	C P/A	CEM Annual source test	Yes	
NOx	SIP 9-9-301.3	Y		9 ppmv @ 15% O2, dry	BAAQMD 9-9-501 and BAAQMD condition #24732, Parts 24 and 28	C P/A	CEM Annual source test	Yes	
NOx	NSPS Subpart KKKK 40 CFR 60.4320(a)	Y		15 ppmv @ 15% O2, dry 4-hour rolling average for turbines at or above 75% of peak load	NSPS 40 CFR 60.4340(b)(1)	C	CEM	Yes	
NOx	NSPS Subpart KKKK 40 CFR 60.4320(a)	Y		96 ppmv @ 15% O2, dry 4-hour rolling average for turbines operating below 75% of peak load	NSPS 40 CFR 60.4340(b)(1)	C	CEM	Yes	
NOx	None	Y		None	40 CFR 75.10	C	CEM	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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 condition #24732, Part 17a	Y		20.83 lb per hour or 0.00946 lb/MMBTU (measured as NO_2), excluding startups, shutdowns, and tunings, and black start readiness testing, commissioning and operations	BAAQMD condition #24732, Parts 24 and 28	C P/A	CEM Annual source test	Yes	
NOx	BAAQMD condition #24732, Part 17b	Y		2.5 ppmv @ 15% O2, dry, Averaged over one hour except during transient hours when a 3-hr average is applied, excluding startups, shutdowns, and tunings, and black start readiness testing, commissioning and operations	BAAQMD condition #24732, Parts 24 and 28	C P/A	CEM Annual source test	Yes	
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	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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 condition #24732, Part 19	Y		80 lb/hr during combustor tuning (as NO_2), excluding black start readiness testing, commissioning and operations	BAAQMD condition #24732, Part 24	C	CEM	Yes	
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, but excluding emissions from readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations) (as NO2)	BAAQMD condition #24732, Part 24	C	CEM	Yes	
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_2), including startups, shutdowns, and tunings, but excluding black start readiness testing, commissioning and black start emergency operations	BAAQMD condition #24732, Part 24	C	CEM	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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 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 NO2) 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	Yes	
CO	BAAQMD condition #24732, Part 17d	Y		2.0 ppmv @ 15% O2, dry, Averaged over any 1-hour, excluding startups, shutdowns and tunings, and black start readiness testing, commissioning and operations	BAAQMD condition #24732, Parts 24 and 28	C P/A	CEM Annual source test	Yes	
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 excluding readiness testing for black start capability, commissioning activities, and black start emergency operations)	BAAQMD condition #24732, Part 24	C	CEM	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
CO	BAAQMD condition #24732, Part 19	Y		450 lb/hr during combustor tuning	BAAQMD condition #24732, Part 24	C	CEM	Yes	
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), but excluding emissions from black start capability, commissioning activities for black start capability, and black start emergency operations)	BAAQMD condition #24732, Part 24	C	CEM	Yes	
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 including startup, shutdowns and tunings, but excluding emissions from readiness testing for black start capability, commissioning activities for black start, and black start emergency operations	BAAQMD condition #24732, Part 24	C	CEM	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
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, including startups, shutdowns, and tunings, but 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	Yes	
CO_2		Y		None	40 CFR 75.10	C	CEM (CO2) or CEM (O2) or fuel flow monitor	Yes	
SO_2	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		Yes	
SO_2	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD condition #24732, Part 11	P/M	Total sulfur analysis	Yes	
SO_2	NSPS Subpart KKKK 40 CFR 60.4330(a)(2)	Y		0.060 lb SO2/MMBtu	NSPS 40 CFR 60.4365(a)	N	None	Yes	
SO_2	None	Y		None	40 CFR 75.11(d)(2), 40 CFR 75, Appendix D, Part 2.3		Fuel measurements, calculations	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
SO_2	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	Yes	
SO_2	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	Yes	
SO_2	BAAQMD condition #24732, Part 20e	Y		596 lb combined from S-1, S-2, S-3, and S-4 per calendar day (except days when tuning occurs) including startups and shutdowns, but 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	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
SO_2	BAAQMD condition #24732, Part 21e	Y		596 lb combined from S-1, S-2, S-3, and S-4 per calendar day, including startups, shutdowns, and tunings, but 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	Yes	
SO_2	BAAQMD condition #24732, Part 22e	Y		4.94 tons/consecutive twelve month period, including startups, shutdowns, and tunings, but 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	Yes	
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Yes	
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		Yes	
Filterable Particulate	BAAQMD 6-1-310	N		0.15 grain/dscf		N		Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
FP	SIP 6-310	Y		0.15 grain/dscf		N		Yes	
PM_{10}	BAAQMD condition #24732, Part 17h	Y		9.0 lb/ hr	BAAQMD condition #24732, Part 28	P/A	Annual source test	Yes	
PM_{10}	BAAQMD condition #24732, Part 20d	Y		864 lb/calendar day (except days when tuning occurs), including startups and shutdowns, but 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	Yes	
PM_{10}	BAAQMD condition #24732, Part 21d	Y		864 lb/calendar day, including startups, shutdowns, and tunings, but 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	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
PM_{10}	BAAQMD condition #24732, Part 22d	Y		31.54 tons/consecutive twelve month period, including startups, shutdowns, and tunings, but 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	Annual source test, District approved calculation	Yes	
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	Yes	
POC	BAAQMD condition #24732, Part 17f	Y		2.9 lb/hr	BAAQMD condition #24732, Part 28	P/A	Annual source test	Yes	
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	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
POC	BAAQMD condition #24732, Part 19	Y		30 lb/hr during combustor tuning	None	None	District approved emission factor (permit limit), Record Keeping	Yes	
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, but 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	Yes	
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	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
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	Yes	
NH_3	BAAQMD condition #24732, Part 17e	N		10 ppmv @ 15% O2, 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	Yes	
Heat input limit	BAAQMD condition #24732, Part 12	Y		2,202 MM BTU/hr (HHV)	BAAQMD condition #24732, Part 24	C	Fuel meter	Yes	
Heat input limit	BAAQMD condition #24732, Part 13	Y		52,848 MM BTU/day (HHV)	BAAQMD condition #24732, Part 24	C	Fuel meter, calculations	Yes	

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-2, S-3, S-4 COMBUSTION GAS TURBINES
January 1, 2019 – June 30, 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
Heat input limit	BAAQMD condition #24732, Part 14	Y		13,994,976 MM BTU/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	Yes	
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	Yes	

Table VII–A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4 BLACK START EMERGENCY OPERATION
January 1, 2019 – June 30, 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 and CO mass	BAAQMD 9-9-501, condition #24732 Part 24l	Y		None	BAAQMD 9-9-501	P/D	Records, calculations	Yes	
NOx and CO mass	BAAQMD 9-9-501, condition #24732 Part 24m	Y		None	BAAQMD 9-9-501 BAAQMD condition #24732 Parts 24 and 28	P/M	Records, calculations	Yes	
POC, PM10, and S02	BAAQMD condition #24732 Part 25c	Y		None	BAAQMD condition #24732 Parts 24 and 28	P/D	Records, calculations	Yes	
POC, PM10, and S02	BAAQMD condition #24732 Part 25d			None	BAAQMD condition #24732 Part 25	P/M	Records, Calculations	Yes	
Hours	BAAQMD condition #24732 Part 41	Y		64 combined hours for commissioning activities for black start capabilities at S-3 and S-4	BAAQMD condition #24732 Parts 43	P/D	Record keeping	Yes	
NOx	BAAQMD condition #24732 Part 42	Y		3,311 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Parts 24, 25 and 43	P/E	CEM, record, calculations	Yes	
CO	BAAQMD condition #24732 Part 42	Y		103,486 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Parts 24, 25 and 43	P/E	CEM, records, calculations	Yes	
POC	BAAQMD condition #24732 Part 42	Y		8,089 lb from commissioning activities for black start	BAAQMD condition #24732 Part 43	P/E	Records, calculations	Yes	
PM10	BAAQMD condition #24732 Part 42	Y		123 lbs. from Commissioning activities for black start capability	BAAQMD condition #24732 Parts 24, 25 and 43	P/E	Records, calculations	Yes	

Table VII–A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4 BLACK START EMERGENCY OPERATION
January 1, 2019 – June 30, 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
SO2	BAAQMD condition #24732 Part 42	Y		84 lbs. from commissioning activities for black start capability	BAAQMD condition #24732 Parts 24, 25 and 43	P/E	Records, calculations	Yes	
NOx	BAAQMD condition #24732 Part 44a	Y		8,048 lb / 24 continuous hours, from readiness testing for black start emergency operations at S-3 and s-4	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	Yes	
CO	BAAQMD condition #24732 Part 44(b)	Y		100,673 lb / 24 continuous hours 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	Yes	
POC	BAAQMD condition #24732 Part 44(c)	Y		7,422 lb / 24 continuous hours 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	Yes	
PM10	BAAQMD condition #24732 Part 44(d)	Y		255 lb / 24 continuous hours , from readiness testing for black start emergency operations at S-3 and s-4	BAAQMD condition #24732 Part 25	P/E	Records, calculations	Yes	
SO_2	BAAQMD condition #24732, part 44(c)	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	Yes	
NOx	BAAQMD condition #24732 Part 45(a)	Y		414 lb / year from readiness resting for black start capability at S-3 and S-4 combined	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	Yes	
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	Yes	

Table VII–A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4 BLACK START EMERGENCY OPERATION
January 1, 2019 – June 30, 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
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	Yes	
PM_{10}	BAAQMD condition #24732 Part 45	Y		10 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	Yes	
SO2	BAAQMD condition #24732 Part 45	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	Yes	
NOx	BAAQMD condition #24732 Part 46(a)	Y		16,283 lb / 12 consecutive months from readiness testing for black start capability and black start emergency operations as S-3 and S-4	BAAQMD condition #24732 Part 24	P/E	CEM, records, calculations	Yes	
CO	BAAQMD condition #24732 Part 46(b)	Y		212,725 lb / 12 consecutive months 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	Yes	
POC	BAAQMD condition #24732 Part 46(c)	Y		15,750 lb /12 consecutive months 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	Yes	
PM_{10}	BAAQMD condition #24732 Part 46(d)	Y		518 lb / 12 consecutive months 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	Yes	

Table VII–A
Applicable Limits and Compliance Monitoring Requirements
S-3, S-4 BLACK START EMERGENCY OPERATION
January 1, 2019 – June 30, 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
SO_2	BAAQMD condition #24732 Part 46(e)	Y		354 lb / 12 consecutive months 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	Yes	
NOx	BAAQMD 2-2-302 condition #24732 Part 47	Y		Submit Offset Credits for NOx Emissions > 16,283 lb /Month	BAAQMD condition #24732 Part #43	P/M	Records, calculations	Yes	
POC	BAAQMD 2-2-302 condition #24732 Part 47	Y		Submit Offset Credits for POC Emissions >15,750 lb / Month	BAAQMD Condition #24732 Part #43	P/M	Records, calculations	Yes	

Table VII–B
Applicable Limits and Compliance Monitoring Requirements
S-7 Standby Diesel Engine Generator Set
S-8 Emergency Standby Diesel Fire Pump Engine
January 1, 2019 – June 30, 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
Opacity	BAAQMD 6-1-303.1	Y		>Ringelmann No.2 for no more than 3 minutes in any hour		N		Yes	
Opacity	SIP Regulation 6-1-303.1	Y		>Ringelmann No.2 for no more than 3 minutes in any hour		N		Yes	
FP	BAAQMD 6-1-310	Y		0.15 gr/dscf Particulate Weight Limitation		N		Yes	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		Yes	
SO_2	BAAQMD 9-1-301	N		GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		Yes	
SO_2	BAAQMD 9-1-304	Y		0.5% sulfur in fuel by weight		N		Yes	
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	Yes	
Hours of operation	BAAQMD Condition #22850, Part 1	Y		Reliability related activities less than 50 hr/yr	BAAQMD Condition #22850, Parts 4a, 4b, 4c	C P/E	Records	Yes	