

CI Power Cogeneration Plant

Camarillo, CA

Title V part 70
Annual Compliance Certification

VCAPCD Permit to Operate #1267

Period covered April 1, 2011 to March 31, 2012

May 2012

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Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:

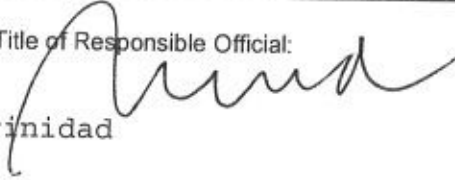
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

<p>Signature and Title of Responsible Official:</p>  <p>Ysabel Trinidad Title: Vice President</p>	<p>Date:</p> <p>5/11/12</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>04</u> / <u>01</u> / <u>11</u> (MM/DD/YY) to <u>03</u> / <u>31</u> / <u>12</u> (MM/DD/YY)</p>
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 11 (MM/DD/YY) to 03 / 31 / 12 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>74.9N7</u></p>	<p>D. Frequency of monitoring: Submit report of annual engine hours of maintenance to District every Calendar Year by February 15.</p>
<p>B. Description: Rule 74.9.D.3 Applicable Requirements Emergency Standby Stationary Internal Combustion Engines Operated During Either an Emergency or Maintenance Operation.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain records of: 1) Annual hours used during maintenance operations 2) Date, time, duration, and reason for emergency operation 3) Engine Manufacturer, model number, operator id, and location.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>ATCM</u></p>	<p>D. Frequency of monitoring: Each Use Each Delivery</p>
<p>B. Description: ATCM for Stationary Compression Ignition Engines.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Record hours operated for maintenance and testing. Records of fuel type purchased for us.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>74.15N1</u></p>	<p>D. Frequency of monitoring: Biennial Source Testing</p>
<p>B. Description: Rule 74.15.B.1 Applicable Requirements Boilers, Heater Treaters, Steam Generators, and Process Heaters: NOx and CO Emission Limits Annual Heat Input > 9,000 MMBTU.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable NOx - ARB Method 100 CO - ARB Method 100</p>
<p>C. Method of monitoring: Maintain Records of: 1) Source test report; and 2) Daily records of alternate fuel consumption.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 04 / 01 / 11 (MM/DD/YY) to 03 / 31 / 12 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: STRMLN1267-LM-2500-NOx, NH3</p> <p>B. Description: GE LM 2500-33 Gas Turbine Based Cogeneration Unit NOx and NH3 Applicable Requirements Including Streamlined NOx Requirements</p>	<p>D. Frequency of monitoring: Annual Source Test Continuous emission monitoring system for fuel consumption, NOx, O2, and control system parameters.</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 1.</p>
<p>C. Method of monitoring: Annual Source Test for NOx, O2, NH3, and gaseous fuel HHV, CEMS data. Maintain Records for: 1) Source test Report 2) Maintenance operations periodic inspections, and repairs performed on the gas turbine, air pollution control system, and continuous emission monitors; and 3) Violations on exceedances of limits.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: STRMLN1267-LM-2500-SOx</p> <p>B. Description: GE LM 2500-33 Gas Turbine Based Cogeneration Unit SOx Applicable Requirements - Streamlined Natural Gas and Distillate Fuel Oil Limits</p>	<p>D. Frequency of monitoring: None</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 2.</p>
<p>C. Method of monitoring: Only used PUC quality gas. Did not have any Distillate Fuel Oil deliveries.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PO1267PC1 Condition No. 1</p> <p>B. Description: Additional Permit Requirements Condition No. 1 - Throughput and Consumption Limits</p>	<p>D. Frequency of monitoring: Monthly</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain 12-month rolling average records of throughput and consumption.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PO1267PC1 Condition No. 2</p> <p>B. Description: Additional Permit Requirements Condition No. 2 - Solvent Usage</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>C. Method of monitoring: Maintain monthly records of solvent purchase and usage, as well as records of solvent that is recycled or disposed of properly.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p> <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 1 & 8</p> <p>B. Description: Additional Permit Requirements Condition No. 1 - Annual Emission and Throughput Limits Condition No. 8 - Records</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>C. Method of monitoring: Maintain rolling 12 month average records of natural gas, fuel oil, and ammonia consumption, as well as emissions of ROC, NOx, PM, SOx, and CO for the gas turbine and for the B&W boilers.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p> <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 2 & 8</p> <p>B. Description: Additional Permit Requirements Condition No. 2 - Steam Boilers - Natural Gas Condition No. 8 - Records</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>C. Method of monitoring: Maintain rolling 12-month average records of fuel consumption and emissions of ROC, NOx, PM, SOx, and CO for the B&W boilers.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p> <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 3 & 8</p> <p>B. Description: Additional Permit Requirements Condition No. 3 - Steam Boilers - Fuel Oil Condition No. 8 - Records</p>	<p>D. Frequency of monitoring: Upon use.</p>
<p>C. Method of monitoring: Maintain Records of fuel oil used. No fuel oil used this period.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 4</p> <p>B. Description: Additional Permit Requirements Condition No. 4 - Steam Boilers - Monitor and Record Fuel Consumption</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>C. Method of monitoring: Continuous monitoring and recording of fuel consumption B&W boilers.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 5</p> <p>B. Description: Additional Permit Requirements Condition No. 5 - Steam Boilers - CEM for excess Oxygen in Exhaust Stacks</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>C. Method of monitoring: Continuous in-stack emissions monitoring and recording of excess oxygen in exhaust stacks of B&W boilers.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 6</p> <p>B. Description: Additional Permit Requirements Condition No. 6 - Steam Boilers - Standby Service</p>	<p>D. Frequency of monitoring: As Needed</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain records documenting the transition period during which the B&W boilers and the Gas Turbine are simultaneously operated.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 7 & 8</p> <p>B. Description: Additional Permit Requirements Condition No. 7 - GE LM 2500-33 Gas Turbine Fuel Use Limits Condition No. 8 - Records</p>	<p>D. Frequency of monitoring: Upon use.</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain Records of fuel oil used. No fuel oil used this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 9</p> <p>B. Description: Additional Permit Requirements Combustion Emission Units Condition No. 9 - Planned Shutdowns</p>	<p>D. Frequency of monitoring: Annually</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Notified District in letter dated October 11, 2011 of dates for planned shutdowns for calendar year 2012.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Formal Survey Periodic visual observations</p>
<p>B. Description: Rule 50 Applicable Requirements Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Routine surveillance and visible inspections. Records of visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour including date, time, and identity of emissions unit.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Rule 54 Applicable Requirements Sulfur Compounds - Sulfur Emissions from Combustion Operations at Point of Discharge.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94.</p>
<p>C. Method of monitoring: Gas analysis demonstrating that natural gas burned has a sulfur content less than 236 ppm.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.2</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Rule 54 Applicable Requirements Sulfur Compounds - Sulfur Dioxide Concentration</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable SO2 - BAAQMD Manual of Procedures, Vol. VI, Section 1, ground Level Monitoring for H2S and SO2.</p>
<p>C. Method of monitoring: Per District Memo dated May 23, 1996, CI Power maintains Sulfur analysis of all fuels that shows Sulfur content below 0.5%. This results in sulfur dioxide concentrations below 0.25 ppm averaged over one hour, or 0.04 ppm averaged over a 24-hour period, at ground level at any point at or beyond the property line.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 55</p>	<p>D. Frequency of monitoring: As needed.</p>
<p>B. Description: Rule 55 Applicable Requirements Fugitive Dust</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Method 9</p>
<p>C. Method of monitoring: No operations, disturbed surface areas, or man made conditions at this stationary source that are subject to Rule 55 this reporting period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> <i>*If yes, attach Deviation Summary Form</i></p>

<p>A. Attachment # or Permit Condition #: Rule 57.1</p>	<p>D. Frequency of monitoring: Continuous.</p>
<p>B. Description: Rule 57 Applicable Requirements Combustion Contaminants - Specific - Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: District analysis of Rule 57.1 compliance is based on EPA emission factors.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> <i>*If yes, attach Deviation Summary Form</i></p>

<p>A. Attachment # or Permit Condition #: Rule 64.B.1</p>	<p>D. Frequency of monitoring: Continuous.</p>
<p>B. Description: Rule 64.B.1 Applicable Requirements Sulfur Content of Fuels - Gaseous Fuel Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable SCAQMD Method 307-94</p>
<p>C. Method of monitoring: Only burned PUC quality natural gas this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> <i>*If yes, attach Deviation Summary Form</i></p>



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<p>A. Attachment # or Permit Condition #: Rule 64.B.2</p>	<p>D. Frequency of monitoring: Each delivery.</p>
<p>B. Description: Rule 64.B.2 Applicable Requirements Sulfur Content of Fuels - Solid or Liquid Fuel Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ASTM D4294-98 or D2622-98</p>
<p>C. Method of monitoring: Maintain Records of sulfur content of fuels purchased. No solid or liquid fuel deliveries this</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.6</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Rule 74.6 Applicable Requirements Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 3.</p>
<p>C. Method of monitoring: Routine surveillance of solvent cleaning activities. Maintain records of current solvent information including: 1) Name and Manufacturer's description. 2) Intended use at the facility. 3) ROC content and ROC composite pressure. 4) Mix Ratio if blended.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.11</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: Rule 74.11 Applicable Requirements Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Facility does not have any applicable equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 74.22</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: Rule 74.22 Applicable Requirements Natural Gas-Fired Fan-Type Central Furnaces.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Facility does not have any applicable equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.1</p>	<p>D. Frequency of monitoring: Not Applicable this period</p>
<p>B. Description: Rule 74.1 Applicable Requirements Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable CCR Section 92400</p>
<p>C. Method of monitoring: Maintain Records of abrasive blasting performed on site. No abrasive blasting performed on site this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.2</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Rule 74.2 Applicable Requirements Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 4.</p>
<p>C. Method of monitoring: Routine surveillance of architectural coating operations. Maintain records of usage of architectural coatings.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 74.4.D</p>	<p>D. Frequency of monitoring: Not Applicable this period</p>
<p>B. Description: Rule 74.4.D Applicable Requirements Cutback Asphalt - Road Oils</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ASTM D402</p>
<p>C. Method of monitoring: Maintain Records of ROC content in cutback asphalt used on site. No cutback asphalt used on site this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR 61.M</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: 40 CFR Part 61, Subpart M Applicable Requirements National Emission Standard for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See 40 CFR 61.145</p>
<p>C. Method of monitoring: Maintain Records of asbestos demolition or renovation activities. No asbestos demolition or renovation performed this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR 68 RMP-1267</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: 40 CFR Part 68 Applicable Requirements Accidental Release Prevention and Risk Management Plans</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Effective 3/27/2009 the Facility de-registered from the 40 CFR Part 68 RMP by reducing on site inventory of all regulated substances below TQ's.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 40 CFR 82</p>	<p>D. Frequency of monitoring: Not Applicable this period</p>
<p>B. Description: 40 CFR Part 82 Applicable Requirements Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: No servicing of motor (fleet) vehicles involving ozone-depleting substance refrigerants in the motor vehicle occurred. No maintenance, repair or disposal of appliances occurred.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p>	<p>F. Currently in Compliance? (Y or N): _____ G. Compliance Status? (C or I): _____ H. *Excursions, exceedances, or other non-compliance? (Y or N): _____ *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p>	<p>F. Currently in Compliance? (Y or N): _____ G. Compliance Status? (C or I): _____ H. *Excursions, exceedances, or other non-compliance? (Y or N): _____ *If yes, attach Deviation Summary Form</p>

NOTE	ATTACHMENT	
1	STRMLN1267-LM-2500-NOx, NH3, BOX E	NOx – EPA Method 20 O2 – ARB Method 100 NH3 – BAAQMD Method ST-1B Nat Gas HHV – ASTM D1826-88 Fuel Oil HHV – ASTM 240-87
2	STRMLN1267-LM-2500-Sox, Box E	Gaseous Fuel – SCAQMD Method 307-94 Fuel Oil – ASTM D4294-98 or D2622-98 Exhaust sulfur compounds – EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD 307-94, as appropriate.
3	Rule 74.6, Box E	ROC Content – EPA Test Method 24 Identity of solvent compounds – ASTM E168-67, ASTM E169-87, or ASTM E260-85 True VP or composite VP – ASTM D2879-86 or other methods per Rule 7436.G.5 Initial Boiling Point – ASTM 1078-78 or published source Spray Gun active/passive solvent losses – SCAQMD method (10-3-89)
4	Rule 74.2, Box E	VOC Content – EPA Method 24 or CARB Method 432 Acid Content – ASTM Method D1613-85 Metal Content – SCAQMD Method 311-91

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**Emergency Standby Stationary Internal Combustion Engines
Attachment 74.9N7**

Emergency standby stationary internal combustion engines are subject to the permit conditions of this Attachment. Annual Compliance Certification consists of the following information.

Engine	Maintenance Operations	Permit Condition
Blackstart Generator	0.8 hours	< 50 hours per year

Emergency Operations

Date / Time	Duration	Reason
4/3/11 09:25	10.2 hours	SCE Equipment Upgrade
9/20/11 11:28	1.0 hours	66 KV line down
11/2/11 17:42	9.4 hours	66 KV line down
12/28/11 08:55	1.6 hours	66 KV line down
3/17/12 14:10	14.5 Hours	66 KV line down

Emergency Standby Stationary Internal Combustion Engine Data

Characteristic	Data
Manufacturer	Detroit Diesel
Model Number	16V71 GDT 565
Operator ID	Blackstart Engine
Location	Between switchyard and package boilers



January 17, 2012

Tod Neilan
Air Quality Specialist, Compliance Division
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

RE: Stationary Internal Combustion Engine Maintenance Hours

Dr. Mr. Neilan,

In compliance with Title V Attachment 74.9 condition 4, the annual hours of maintenance operation for CY 2011 are summarized below:

Engine	Maintenance Operation	Permit Condition
Blackstart Generator	1.20 hours per year	< 50 hours per year

If you have any questions, please feel free to contact me at 805-388-7065 or via email jeff.smith@csuci.edu.

Sincerely,

Jeffrey M. Smith
Plant Manager
CI Power

**Emergency Standby Stationary Internal Combustion Engines
Attachment ATCM**

Emergency standby stationary internal combustion engines are subject to the permit conditions of this Attachment. Annual Compliance Certification consists of the following information.

Engine	Maintenance Operations	Permit Condition
Blackstart Generator	0.8 hours	< 20 hours per year

Emergency Standby Stationary Internal Combustion Engine Fuel Purchases

Date	Volume	Fuel Type
11/16/11	534 Gallons	CARB Ultra Low Sulfur dyed Diesel Fuel

**GE LM 2500-33 Gas Turbine Based Cogeneration Unit
Attachment STRMLN1267LM2500-NO_xNH₃**

GE LM 2500-33 Gas Turbine is subject to the permit conditions of this Attachment. Annual Compliance Certification includes the following information.

*No Breakdowns this reporting period.

List of CEM Breakdowns

Date	Time	Description	Excess Emissions

**Emergency Standby Stationary Internal Combustion Engines
Attachment ATCM**

Emergency standby stationary internal combustion engines are subject to the permit conditions of this Attachment. Annual Compliance Certification consists of the following information.

Engine	Maintenance Operations	Permit Condition
Blackstart Generator	0.8 hours	< 20 hours per year

Emergency Standby Stationary Internal Combustion Engine Fuel Purchases

Date	Volume	Fuel Type
11/16/11	534 Gallons	CARB Ultra Low Sulfur dyed Diesel Fuel

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	141.984	158.055	164.037	168.072	162.195	143.347	162.245	157.172	173.432	154.415	167.238	137.224
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2009.08	2236.48	2321.12	2378.22	2294.94	2028.96	2285.77	2223.98	2454.07	2184.98	2366.42	1841.72
NOx	3656.82	3981.74	3934.258	4159.85	4000.18	3819.19	4052.2	3905.33	4365.74	3853.59	4209.1	3244.7
PM	865.10	964.14	1000.62	1025.24	989.34	874.41	989.69	958.75	1057.94	941.94	1020.15	837.07
SOx	85.19	94.83	98.42	100.84	97.31	86.01	97.35	94.30	104.06	92.65	100.34	82.33
CO	7501.03	8350.07	8666.05	8879.25	8568.31	7573.01	8571.40	8303.38	9162.42	8157.78	8835.20	7249.55
NH ₃ Usage (KSCF)	225.125	221.641	225.586	228.342	209.266	188.088	241.377	215.333	250.378	223.960	222.396	240.330

GE LM-2500-33 GAS TURBINE		
EMISSION SUBTOTALS		EMISSION FACTORS
		GAS LBS/MMCF
1889.41	MMCF	14.15
0.00	MMCF	
26735.13	LBS	13.37 TONS
47222.70	LBS	23.61 TONS
11525.39	LBS	5.76 TONS
1133.65	LBS	0.57 TONS
99817.45	LBS	49.91 TONS
		FUEL OIL LBS/MGAL
		1.84

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	1.497	0.306	0.196	0.100	0.178	1.261	0.492	0.810	0.067	0.165	0.095	1.334
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	20.13	4.12	2.63	1.35	2.39	16.96	6.62	10.89	0.76	2.21	1.28	17.94
NOx	76.25	15.59	9.96	5.09	9.07	64.24	25.06	41.26	2.88	8.39	4.83	67.95
PM	11.38	2.33	1.49	0.76	1.35	9.58	3.74	6.16	0.43	1.25	0.72	10.14
SOx	0.90	0.18	0.12	0.08	0.11	0.76	0.30	0.49	0.03	0.10	0.08	0.80
CO	464.01	84.86	60.64	31.00	55.16	390.97	152.52	251.07	17.55	51.05	29.41	413.54

BABCOCK & WILCOX BOILERS		
EMISSION SUBTOTALS		EMISSION FACTORS
		GAS LBS/MMCF
6.49	MMCF	13.45
0.00	MMCF	
87.28	LBS	0.04 TONS
330.57	LBS	0.17 TONS
49.32	LBS	0.02 TONS
3.89	LBS	0.00 TONS
2011.72	LBS	1.01 TONS
		FUEL OIL LBS/MGAL
		7.60

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.10	0.10	0.00	0.40	0.30	0.00	0.30	0.20	0.40	0.20	0.20	0.00
Emergency	0.00	7.20	0.00	0.00	0.00	12.00	0.00	8.00	0.00	0.00	0.00	10.20

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

PERMITTED CONDITIONS (PER YEAR)	
ROC	14.88 TONS
NOx	33.38 TONS
PM	8.73 TONS
SOx	25.01 TONS
CO	57.59 TONS

EMISSION TOTALS	
ROC	26622.41 LBS
NOx	47563.27 LBS
PM	11574.71 LBS
SOx	1137.54 LBS
CO	101829.18 LBS
	50.91 TONS

TOTAL HOURS	
Maintenance	2.20 HOURS
Emergency	37.40 HOURS

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	EMISSION SUBTOTALS												EMISSION FACTORS	
	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	GAS LBS/MMCF
Fuel Gas (MMCF)	158.055	164.037	168.072	162.166	143.347	162.245	157.172	173.432	154.416	167.238	137.224	154.646		
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0		
ROC	2236.48	2321.12	2378.22	2284.94	2026.36	2295.77	2223.98	2454.07	2184.98	2366.42	1941.72	2188.23	13.46 TONS	14.15
NOx	3981.74	3934.258	4159.85	4000.18	3819.19	4062.2	3905.33	4385.74	3853.59	4209.1	3244.7	3633.1	23.69 TONS	1.84
PM	964.14	1000.62	1025.24	989.34	874.41	989.69	968.75	1057.94	941.94	1020.15	837.07	943.34	5.80 TONS	6.10
SOx	94.83	98.47	100.84	97.31	86.01	97.35	94.30	104.06	92.65	100.34	82.33	92.79	0.57 TONS	0.60
CO	8350.07	8686.06	8879.25	8568.31	7573.01	8571.40	8303.38	9162.42	8157.78	8835.20	7249.55	8169.93	50.24 TONS	24.41
NH3 Usage (MMCF)	221.841	225.585	228.342	209.268	188.088	241.377	215.333	250.378	223.960	222.385	240.330	262.280	52.83	4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	EMISSION SUBTOTALS												EMISSION FACTORS	
	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	GAS LBS/MMCF
Fuel Gas (MMCF)	0.306	0.195	0.100	0.178	1.261	0.492	0.810	0.057	0.165	0.095	1.334	0.453		
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0		
ROC	4.12	2.63	1.35	2.39	16.96	6.62	10.89	0.76	2.21	1.28	17.94	6.10	0.04 TONS	13.45
NOx	15.59	9.96	5.09	9.07	64.24	25.06	41.26	2.88	8.39	4.83	67.95	23.10	0.14 TONS	50.84
PM	2.33	1.49	0.76	1.35	9.58	3.74	6.16	0.43	1.25	0.72	10.14	3.45	0.02 TONS	7.80
SOx	0.18	0.12	0.06	0.11	0.78	0.30	0.49	0.03	0.10	0.06	0.80	0.27	0.00 TONS	0.60
CO	94.86	60.64	31.00	55.18	380.91	152.52	251.07	17.55	51.05	29.41	413.54	140.57	0.84 TONS	310.00

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	PERMITTED CONDITIONS (PER YEAR)												
	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11
Maintenance	0.10	0.00	0.40	0.30	0.00	0.30	0.20	0.40	0.20	0.20	0.00	0.10	2.20 HOURS
Emergency	7.20	0.00	0.00	0.00	12.00	0.00	8.00	0.00	0.00	0.00	10.20	0.00	37.40 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	HOURS
Maintenance	20.00 HOURS
Emergency	N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	EMISSION SUBTOTALS												EMISSION FACTORS	
	1	2	3	4	5	6	7	8	9	10	11	12	GAS LBS/MMCF	FUEL OIL LBS/MGAL
Fuel Gas (MMCF)	164.037	156.072	162.185	143.347	152.245	157.172	173.432	154.416	167.238	137.224	154.646	151.077	1895.09	
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0	0.00	
ROC	2321.12	2378.22	2294.94	2028.36	2295.77	2723.98	2454.07	2184.98	2366.42	1941.72	2188.23	2137.75	13.41	1.84
NOx	3534.258	4159.85	4000.18	3818.19	4052.2	3905.33	4385.74	3853.59	4209.1	3244.7	3633.1	3415.49	23.41	CEM
PM	1000.62	1025.24	989.34	874.41	989.69	958.75	1057.94	941.84	1020.15	837.07	943.34	921.57	3.76	CEM
SOx	98.42	100.84	97.31	86.01	97.35	94.30	104.06	92.65	100.34	82.33	92.79	90.85	6.10	3.10
CO	8656.05	8879.25	8968.31	7573.01	8571.40	8303.38	9182.42	8157.78	8835.20	7249.55	8169.93	7981.42	0.57	24.41
NH3 Usage (lbscf)	225.566	226.342	209.295	188.088	241.377	215.333	250.378	223.960	222.396	240.330	262.260	166.420	50.06	4.45

EMISSION SUBTOTALS				EMISSION FACTORS	
MMCF	LBS	TONS	LBS/MMCF	LBS/MGAL	
1895.09			13.41	1.84	
0.00			23.41	CEM	
26815.55			3.76	3.10	
46922.73			0.57	24.41	
11560.06			50.06	4.45	
1137.06					
100117.71					

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	EMISSION SUBTOTALS												EMISSION FACTORS	
	1	2	3	4	5	6	7	8	9	10	11	12	GAS LBS/MMCF	FUEL OIL LBS/MGAL
Fuel Gas (MMCF)	0.196	0.100	0.178	1.261	0.492	0.810	0.057	0.165	0.095	1.334	0.453	0.104	5.24	
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0	0.00	
ROC	2.83	1.35	2.39	16.96	6.62	10.89	0.76	2.21	1.28	17.94	6.10	1.40	0.04	1.60
NOx	9.96	5.09	9.07	64.24	25.06	41.26	2.86	8.39	4.83	67.85	23.10	5.32	0.13	20.74
PM	1.49	0.76	1.35	9.58	3.74	6.16	0.43	1.25	0.72	10.14	3.45	0.79	0.02	2.00
SOx	0.12	0.06	0.11	0.76	0.30	0.49	0.03	0.10	0.06	0.80	0.27	0.06	0.00	0.60
CO	60.64	31.00	55.18	390.91	152.52	251.07	17.55	51.05	29.41	413.54	140.57	32.95	0.81	310.00

EMISSION SUBTOTALS				EMISSION FACTORS	
MMCF	LBS	TONS	LBS/MMCF	LBS/MGAL	
5.24			0.04	1.60	
0.00			0.13	20.74	
70.54			0.02	2.00	
267.15			0.00	0.60	
39.86			0.81	310.00	
3.15					
1625.79					

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)		EMISSION TOTALS	
ROC	NOx	LBS	TONS
14.88	33.38	26885.09	13.44
8.73	25.01	47089.88	23.54
57.59	5.80	11589.92	5.80
		1140.20	0.57
		101743.50	50.87

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	TOTAL HOURS												PERMITTED LIMITS	
	1	2	3	4	5	6	7	8	9	10	11	12	Maintenance	Emergency
Maintenance	0.00	0.40	0.30	0.00	0.30	0.20	0.40	0.20	0.20	0.00	0.10	0.00	20.00	
Emergency	0.00	0.00	0.00	12.00	0.00	8.00	0.00	0.00	0.00	10.20	0.00	0.00	N/A	

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	EMISSION SUBTOTALS												EMISSION FACTORS	
	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	GAS LBS/MMCF	FUEL OIL LBS/MGAL
Fuel Gas (MMCF)	168.072	162.185	143.347	162.245	157.172	173.432	154.416	187.238	137.224	154.646	151.077	182.827	1893.88	0.00
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0	0.00	26798.44
ROC	2378.22	2284.84	2028.36	2295.77	2223.96	2454.07	2184.98	2366.42	1941.72	2186.23	2137.75	2304.00	13.40	14.15
NOx	4159.85	4000.18	3819.19	4062.2	3905.33	4385.74	3853.59	4209.1	3244.7	3833.1	3415.49	3136.83	23.01	1.84
PM	1025.24	989.34	874.41	989.69	968.75	1057.94	941.94	1020.15	837.07	943.34	921.87	993.24	5.78	6.10
SOx	100.84	97.31	86.01	97.35	94.30	104.06	92.65	100.34	82.33	92.79	90.85	97.70	0.57	0.60
CO	8879.25	8668.31	7573.01	8571.40	8303.38	9162.42	8157.78	8835.20	7249.55	8189.93	7981.42	8602.15	0.60	24.41
NH3 Usage (Kscf)	228.342	209.286	188.088	241.377	215.353	250.378	223.950	222.366	240.330	262.280	166.420	158.508	50.03	52.83
														4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	EMISSION SUBTOTALS												EMISSION FACTORS	
	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	GAS LBS/MMCF	FUEL OIL LBS/MGAL
Fuel Gas (MMCF)	0.100	0.178	1.261	0.492	0.810	0.057	0.165	0.095	1.334	0.453	0.104	0.000	5.05	0.00
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0	0.00	257.19
ROC	1.35	2.39	16.96	6.62	10.89	0.76	2.21	1.28	17.94	6.10	1.40	0.00	0.03	13.45
NOx	5.09	9.07	64.24	25.06	41.26	2.88	8.39	4.83	67.95	23.10	5.32	0.00	0.13	50.84
PM	0.76	1.35	9.58	3.74	6.16	0.43	1.25	0.72	10.14	3.45	0.79	0.00	0.02	7.80
SOx	0.08	0.11	0.76	0.30	0.49	0.03	0.10	0.06	0.80	0.27	0.06	0.00	0.00	2.00
CO	31.00	55.18	390.91	152.52	281.07	17.56	51.05	28.41	413.54	140.57	32.36	0.00	0.78	310.00

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	PERMITTED CONDITIONS (PER YEAR)												
	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	
Maintenance	0.40	0.30	0.00	0.30	0.20	0.40	0.20	0.20	0.00	0.10	0.00	0.20	14.88
Emergency	0.00	0.00	12.00	0.00	8.00	0.00	0.00	0.00	10.20	0.00	0.00	0.00	33.38
													8.73
													25.01
													57.59

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

EMISSION TOTALS	
ROC	26966.34 LBS
NOx	46282.49 LBS
PM	11591.05 LBS
SOx	1139.36 LBS
CO	101618.96 LBS

EMISSION TOTALS	
ROC	13.43 TONS
NOx	23.14 TONS
PM	5.80 TONS
SOx	0.37 TONS
CO	50.81 TONS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	162.185	143.347	152.245	157.172	173.432	154.416	157.238	137.224	154.646	151.077	162.827	163.192
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2294.94	2028.36	2285.77	2223.98	2454.07	2184.98	2368.42	1941.72	2188.23	2137.75	2304.00	2309.17
NOx	4000.18	3819.19	4062.2	3905.33	4385.74	3853.59	4209.1	3244.7	3833.1	3415.49	3136.83	3015.65
PM	989.34	874.41	909.69	858.75	1057.94	941.94	1020.15	837.07	943.34	921.57	993.24	995.47
SOx	97.31	85.01	97.35	94.30	104.06	92.65	100.34	82.33	92.79	90.65	97.70	97.92
CO	8568.31	7573.01	8571.40	8303.38	9162.42	8157.78	8835.20	7249.55	8169.93	7981.42	8602.15	8621.43
NH ₃ Usage (MSCF)	209.285	168.069	241.377	215.333	250.378	223.950	222.368	240.330	262.280	166.420	158.503	161.222

GE LM-2500-33 GAS TURBINE			EMISSION FACTORS	
EMISSION SUBTOTALS			GAS	FUEL OIL
			LBS/MMCF	LBS/MGAL
1869.00	MMCF		14.15	1.84
0.00	MMCF			
26729.38	LBS	13.36 TONS		
44891.10	LBS	22.44 TONS		
11522.91	LBS	5.76 TONS		
1133.40	LBS	0.57 TONS		
99795.99	LBS	49.90 TONS		

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.178	1.261	0.492	0.810	0.057	0.165	0.095	1.334	0.453	0.104	0.000	0.252
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2.39	16.96	6.52	10.89	0.76	2.21	1.28	17.84	6.10	1.40	0.00	3.39
NOx	9.07	64.24	25.05	41.26	2.88	8.39	4.83	67.95	23.10	5.32	0.00	12.83
PM	1.35	9.58	3.74	6.16	0.43	1.25	0.72	10.14	3.45	0.79	0.00	1.91
SOx	0.11	0.76	0.30	0.49	0.03	0.10	0.08	0.80	0.27	0.06	0.00	0.15
CO	55.18	390.91	152.52	251.07	17.55	51.05	29.41	413.54	140.57	32.36	0.00	78.10

BABCOCK & WILCOX BOILERS			EMISSION FACTORS	
EMISSION SUBTOTALS			GAS	FUEL OIL
			LBS/MMCF	LBS/MGAL
5.20	MMCF		13.45	1.60
0.00	MMCF			
69.95	LBS	0.03 TONS		
264.93	LBS	0.13 TONS		
39.53	LBS	0.02 TONS		
3.12	LBS	0.00 TONS		
1612.24	LBS	0.81 TONS		

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)	
ROC	14.88 TONS
NOx	33.38 TONS
PM	8.73 TONS
SOx	25.01 TONS
CO	57.59 TONS

EMISSION TOTALS	
ROC	26789.33 LBS
NOx	45146.03 LBS
PM	11562.44 LBS
SOx	1136.52 LBS
CO	101408.23 LBS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.30	0.00	0.30	0.20	0.40	0.20	0.20	0.00	0.10	0.00	0.20	0.30
Emergency	0.00	12.00	0.00	8.00	0.00	0.00	0.00	10.20	0.00	0.00	0.00	0.00

TOTAL HOURS	
	2.20 HOURS
	30.20 HOURS

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	143.347	162.245	157.172	173.432	154.416	167.238	137.224	154.646	151.077	162.827	163.192	157.314
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2028.36	2295.77	2223.98	2454.07	2184.98	2366.42	1841.72	2188.23	2137.75	2304.00	2309.17	2225.99
NOx	3519.19	4067.2	3905.33	4385.74	3853.59	4209.1	3244.7	3833.1	3415.49	3136.83	3015.65	3137.73
PM	874.41	989.69	958.75	1057.94	941.94	1020.15	837.07	943.34	921.57	983.24	995.47	959.62
SOx	86.01	97.35	94.30	104.06	92.85	100.34	82.33	92.78	90.65	97.70	97.92	94.38
CO	7573.01	8571.40	8303.38	9162.42	8157.78	8835.20	7248.55	8169.93	7981.42	8602.15	8627.43	8310.90
NH3 Usage (Kscf)	188.068	241.377	215.333	250.378	223.960	222.395	240.330	262.280	166.420	156.508	161.222	154.076

GE LM-2500-33 GAS TURBINE		EMISSION FACTORS	
EMISSION SUBTOTALS		GAS	FUEL OIL
1884.13	MMCF	LBS/MMCF	LBS/MGAL
0.00	MMCF		
26660.44	LBS	13.33 TONS	14.15
44018.65	LBS	22.01 TONS	CEM
11493.19	LBS	5.75 TONS	6.10
1130.48	LBS	0.57 TONS	0.60
99538.58	LBS	49.77 TONS	52.83
			4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	1.261	0.492	0.810	0.057	0.165	0.095	1.334	0.453	0.104	0.000	0.252	0.170
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	16.96	6.62	10.89	0.76	2.21	1.28	17.94	6.10	1.40	0.00	3.39	2.29
NOx	64.24	25.06	41.26	2.88	8.39	4.83	67.95	23.10	5.32	0.00	12.83	8.66
PM	9.58	3.74	6.16	0.43	1.25	0.72	10.14	3.45	0.79	0.00	1.91	1.29
SOx	0.76	0.30	0.49	0.03	0.10	0.06	0.80	0.27	0.06	0.00	0.15	0.10
CO	360.91	152.52	251.07	17.55	51.05	29.41	413.54	140.57	32.36	0.00	76.10	52.70

BABCOCK & WILCOX BOILERS		EMISSION FACTORS	
EMISSION SUBTOTALS		GAS	FUEL OIL
5.19	MMCF	LBS/MMCF	LBS/MGAL
0.00	MMCF		
69.84	LBS	0.03 TONS	13.45
284.52	LBS	0.13 TONS	50.84
39.47	LBS	0.02 TONS	7.60
3.12	LBS	0.00 TONS	2.00
1609.76	LBS	0.80 TONS	310.00
			43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.30	0.20	0.40	0.20	0.20	0.00	0.10	0.00	0.20	0.30	0.00
Emergency	12.00	0.00	8.00	0.00	0.00	0.00	10.20	0.00	0.00	0.00	0.00	1.00

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

PERMITTED CONDITIONS (PER YEAR)	
ROC	14.68 TONS
NOx	33.38 TONS
PM	6.73 TONS
SOx	25.01 TONS
CO	57.59 TONS

EMISSION TOTALS	
ROC	26730.28 LBS
NOx	44283.17 LBS
PM	11532.66 LBS
SOx	1133.59 LBS
CO	101148.34 LBS

TOTAL HOURS	
	1.90 HOURS
	31.20 HOURS

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	162.245	157.172	173.432	154.416	167.238	137.224	154.646	151.077	162.827	163.192	157.314	131.720
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2295.77	2223.98	2454.07	2184.98	2366.42	1941.72	2188.23	2137.75	2304.00	2309.17	2225.99	1863.83
NOx	4062.2	3905.33	4385.74	3853.59	4209.1	3244.7	3833.1	3415.49	3136.83	3015.65	3137.73	2633.85
PM	989.69	958.75	1057.94	941.94	1020.15	837.07	943.34	921.57	993.24	995.47	959.62	803.49
SOx	97.35	94.30	104.05	92.65	100.34	82.33	92.79	80.65	97.70	97.92	94.39	79.03
CO	8571.40	8303.38	9162.42	8157.78	8835.20	7249.55	8169.93	7981.42	8602.15	8621.43	8310.90	8558.74
NH3 Usage (KSCF)	241.377	215.333	250.378	223.960	222.386	240.330	262.280	166.420	156.508	161.222	154.076	142.108

EMMISSION SUBTOTALS			EMISSION FACTORS		
1872.50	MMCF			GAS	FUEL OIL
0.00	MMCF			LESS/MMCF	LESS/MGAL
26495.91	LBS	13.75 TONS		14.15	1.84
43133.31	LBS	21.57 TONS			CEM
11422.27	LBS	5.71 TONS			CEM
1123.50	LBS	0.56 TONS			0.60
98924.31	LBS	49.46 TONS			52.83
					4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.492	0.810	0.057	0.165	0.095	1.334	0.453	0.104	0.000	0.252	0.170	1.336
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	6.62	10.89	0.76	2.21	1.28	17.94	6.10	1.40	0.00	3.39	2.29	17.97
NOx	25.06	41.26	2.89	8.39	4.83	67.85	23.10	5.32	0.00	12.83	8.66	68.06
PM	3.74	6.16	0.43	1.25	0.72	10.14	3.45	0.79	0.00	1.91	1.29	10.15
SOx	0.30	0.49	0.03	0.10	0.06	0.80	0.27	0.06	0.00	0.15	0.10	0.80
CO	152.52	251.07	17.55	51.05	28.41	413.54	140.57	32.36	0.00	78.10	52.70	414.16

EMMISSION SUBTOTALS			EMISSION FACTORS		
5.27	MMCF			GAS	FUEL OIL
0.00	MMCF			LESS/MMCF	LESS/MGAL
70.85	LBS	0.04 TONS		13.45	1.80
268.34	LBS	0.13 TONS			50.94
40.04	LBS	0.02 TONS			7.80
3.16	LBS	0.00 TONS			0.60
1633.01	LBS	0.62 TONS			310.00
					43.92

PERMITTED CONDITIONS (PER YEAR)	11	12
ROC	14.88 TONS	
NOx	33.38 TONS	
PM	8.73 TONS	
SOx	25.01 TONS	
CO	57.59 TONS	

EMISSION TOTALS	
26586.76	LBS 13.28 TONS
43401.65	LBS 21.70 TONS
11462.30	LBS 5.73 TONS
1126.66	LBS 0.56 TONS
100557.33	LBS 50.28 TONS

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.30	0.20	0.40	0.20	0.20	0.00	0.10	0.00	0.20	0.30	0.00	0.00
Emergency	0.00	8.00	0.00	0.00	0.00	10.20	0.00	0.00	0.00	0.00	1.00	0.00
TOTAL HOURS												
	1.90 HOURS	19.20 HOURS										

PERMITTED LIMITS	11	12
Maintenance	20.00 HOURS	
Emergency	N/A	HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	157.172	173.432	154.418	167.238	137.224	154.646	151.077	162.827	163.192	157.314	131.720	163.642
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2223.98	2454.07	2184.98	2368.42	1941.72	2188.23	2137.75	2304.00	2309.17	2225.99	1863.83	2315.53
NOx	3905.33	4385.74	3853.59	4209.1	3244.7	3833.1	3415.49	3136.83	3015.65	3137.73	2933.85	3784.47
PM	958.75	1057.94	941.94	1020.15	837.07	943.34	921.57	983.24	995.47	959.62	803.49	988.21
SOx	8303.38	9162.42	8157.78	8835.20	7249.55	8169.93	7961.42	8602.15	8621.43	8310.90	6958.74	8645.18
CO	215.333	250.378	223.960	222.385	240.330	262.280	168.420	158.508	161.222	154.076	142.108	205.141
ME3 Usage (M3CF)												

GE LM-2500-33 GAS TURBINE		
EMISSION SUBTOTALS		EMISSION FACTORS
1873.90	MMCF	GAS LBS/MMCF
0.00	MMCF	FUEL OIL LBS/MGAL
26515.67	LBS	13.26 TONS
42855.53	LBS	21.43 TONS
11430.79	LBS	5.72 TONS
1124.34	LBS	0.56 TONS
98968.09	LBS	49.50 TONS
		52.83
		4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.810	0.057	0.165	0.093	1.334	0.453	1.04	0.000	0.252	0.170	1.336	0.117
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	10.89	0.76	2.21	1.28	17.94	6.10	1.40	0.00	3.39	2.29	17.97	1.87
NOx	41.28	2.88	8.39	4.83	67.95	23.10	5.32	0.00	12.83	8.68	68.06	5.96
PM	6.16	0.43	1.25	0.72	10.14	3.45	0.79	0.00	1.91	1.29	10.15	0.89
SOx	0.49	0.03	0.10	0.06	0.80	0.27	0.08	0.00	0.15	0.10	0.80	0.07
CO	251.07	17.55	51.05	29.41	413.54	140.57	32.38	0.00	78.10	52.70	414.16	38.27

BABCOCK & WILCOX BOILERS		
EMISSION SUBTOTALS		EMISSION FACTORS
4.89	MMCF	GAS LBS/MMCF
0.00	MMCF	FUEL OIL LBS/MGAL
65.81	LBS	0.03 TONS
249.24	LBS	0.12 TONS
37.19	LBS	0.02 TONS
2.94	LBS	0.00 TONS
1516.76	LBS	0.76 TONS
		310.00
		43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.20	0.40	0.20	0.20	0.00	0.10	0.00	0.20	0.30	0.00	0.00	0.00
Emergency	8.00	0.00	0.00	0.00	10.20	0.00	0.00	0.00	0.00	1.00	0.00	9.40

TOTAL HOURS	
1.60	HOURS
28.60	HOURS

PERMITTED CONDITIONS (PER YEAR)	
14.88	TONS
33.38	TONS
8.73	TONS
25.01	TONS
57.59	TONS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	
20.00	HOURS
N/A	HOURS

CI POWER COGENERATION PLANT ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	173.432	154.416	167.238	137.224	154.646	151.077	162.827	163.192	157.314	131.720	163.642	168.167
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2454.07	2184.98	2366.42	1941.72	2188.23	2137.75	2304.00	2309.17	2225.99	1863.83	2315.53	2379.58
NOx	4385.74	3853.59	4209.1	3244.7	3633.1	3415.49	3136.83	3015.65	3137.73	2933.85	3784.42	4124.09
PM	1057.94	941.94	1020.15	837.07	943.34	921.57	993.24	995.47	969.62	803.49	998.21	1025.82
SOx	104.06	97.65	100.34	82.33	92.79	90.65	97.70	97.92	94.39	79.03	98.18	100.90
CO	9182.42	8151.78	8835.20	7249.55	8169.93	7981.42	8602.15	8621.43	8310.90	6958.74	8845.18	8884.25
NH3 Usage (KSCF)	250.378	223.960	222.366	240.330	262.280	166.420	156.508	161.222	154.076	142.108	205.141	234.649

GE LM-2500-33 GAS TURBINE			EMISSION FACTORS	
EMISSION SUBTOTALS			GAS	FUEL OIL
			LBS/MMCF	LBS/MGAL
1884.89	MMCF		14.15	1.84
0.00	MMCF			
29671.25	LBS	13.34 TONS		
43074.29	LBS	21.54 TONS		
11497.88	LBS	5.75 TONS		
1130.94	LBS	0.57 TONS		
95578.96	LBS	49.79 TONS		
			52.83	4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.057	0.165	0.056	1.334	0.453	0.104	0.000	0.252	0.170	1.336	0.117	0.212
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	0.76	2.21	1.28	17.94	8.10	1.40	0.00	3.39	2.29	17.97	1.57	2.85
NOx	2.86	8.39	4.83	67.95	23.10	5.32	0.00	12.83	8.66	68.06	5.96	10.81
PM	0.43	1.25	0.72	10.14	3.45	0.79	0.00	1.91	1.29	10.15	0.89	1.61
SOx	0.03	0.10	0.06	0.80	0.27	0.06	0.00	0.15	0.10	0.80	0.07	0.13
CO	17.55	51.05	29.41	413.54	140.57	32.36	0.00	78.10	52.70	414.16	36.27	65.79

BABCOCK & WILCOX BOILERS			EMISSION FACTORS	
EMISSION SUBTOTALS			GAS	FUEL OIL
			LBS/MMCF	LBS/MGAL
4.30	MMCF		13.45	1.60
0.00	MMCF			
57.77	LBS	0.03 TONS		
218.79	LBS	0.11 TONS		
32.64	LBS	0.02 TONS		
2.58	LBS	0.00 TONS		
1331.49	LBS	0.67 TONS		
			310.00	43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)	
ROC	14.88 TONS
NOx	33.38 TONS
PM	8.73 TONS
SOx	25.01 TONS
CO	57.59 TONS

EMISSION TOTALS	
ROC	26729.02 LBS
NOx	43293.08 LBS
PM	11530.50 LBS
SOx	1133.51 LBS
CO	100910.45 LBS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.40	0.20	0.20	0.00	0.10	0.00	0.20	0.30	0.00	0.00	0.00	0.00
Emergency	0.00	0.00	0.00	10.20	0.00	0.00	0.00	0.00	1.00	0.00	9.40	1.60

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM/ In-Use Emergency Engines

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	154.415	187.238	137.224	154.546	151.077	162.827	163.192	157.314	131.720	163.642	168.167	170.830
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2184.98	2366.42	1941.72	2188.23	2137.75	2304.00	2309.17	2225.98	1863.83	2315.53	2379.56	2417.24
NOx	3853.59	4209.1	3244.7	3833.1	3415.49	3136.83	3015.65	3137.73	2933.85	3784.42	4124.09	4101.06
PM	941.94	1020.15	837.07	943.34	921.57	963.24	985.47	959.62	803.49	998.21	1025.82	1042.06
SOx	92.65	100.34	82.33	92.78	90.65	97.70	97.92	94.39	79.03	98.18	100.90	102.50
CO	8157.78	8835.20	7249.55	8169.93	7981.42	8602.15	8621.43	8310.90	6958.74	8645.18	8984.25	9024.94
M3 Usage (KSCF)	223.960	222.386	240.330	262.280	166.420	156.506	161.222	134.076	142.108	205.141	234.549	239.243

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.165	0.095	1.334	0.453	0.104	0.000	0.252	0.170	1.336	0.117	0.212	0.132
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2.21	1.28	17.94	6.10	1.40	0.00	3.39	2.29	17.97	1.57	2.85	1.78
NOx	8.39	4.83	67.95	23.10	5.32	0.00	12.83	8.66	68.06	5.86	10.81	6.75
PM	1.25	0.72	10.14	3.45	0.79	0.00	1.91	1.29	10.15	0.89	1.61	1.01
SOx	0.10	0.08	0.80	0.27	0.06	0.00	0.15	0.10	0.80	0.07	0.13	0.08
CO	51.05	28.41	413.54	140.57	32.36	0.00	78.10	52.70	414.16	36.27	65.79	41.07

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.20	0.20	0.00	0.10	0.00	0.20	0.30	0.00	0.00	0.00	0.00	0.20
Emergency	0.00	0.00	10.20	0.00	0.00	0.00	0.00	1.00	0.00	0.00	9.40	0.00

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines Attachment ATCM In-Use Emergency Engines

GE LM-2500-33 GAS TURBINE			EMISSION FACTORS		
EMISSION SUBTOTALS			EMISSION FACTORS		
1687.29	MMCF			GAS	FUEL OIL
0.00	MMCF			LBS/MMCF	LBS/MGAL
26634.43	LBS	13.32 TONS	14.15		1.84
42789.63	LBS	21.39 TONS	6.10		3.10
11481.98	LBS	5.74 TONS	0.60		24.41
1129.38	LBS	0.56 TONS	52.83		4.45
99441.49	LBS	49.72 TONS			

BABCOCK & WILCOX BOILERS			EMISSION FACTORS		
EMISSION SUBTOTALS			EMISSION FACTORS		
4.37	MMCF			GAS	FUEL OIL
0.00	MMCF			LBS/MMCF	LBS/MGAL
58.79	LBS	0.03 TONS	13.45		1.60
222.66	LBS	0.11 TONS	50.84		20.72
33.22	LBS	0.02 TONS	7.80		2.00
2.62	LBS	0.00 TONS	0.60		24.41
1355.01	LBS	0.68 TONS	310.00		43.92

EMISSION TOTALS	
26693.22	LBS
43012.29	LBS
11515.20	LBS
1132.00	LBS
100798.49	LBS
13.35	TONS
21.51	TONS
5.76	TONS
0.57	TONS
50.40	TONS

TOTAL HOURS	
1.20	HOURS
22.20	HOURS

PERMITTED LIMITS	HOURS
Maintenance	20.00
Emergency	N/A

CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	12											
	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Jan-12	Feb-12
Fuel Gas (MMCF)	167.238	137.224	154.646	151.077	162.827	163.192	157.314	131.720	163.642	168.167	170.830	164.320
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	2366.42	1941.72	2188.23	2137.75	2304.00	2309.17	2225.99	1863.83	2315.53	2379.56	2417.24	2325.12
NOx	4709.1	3244.7	3833.1	3415.49	3136.83	3015.65	3137.73	2933.85	3784.42	4124.09	4101.08	3931.13
PM	1020.15	637.07	943.34	921.57	993.24	995.47	959.62	803.49	998.21	1025.82	1042.06	1002.35
SOx	100.34	82.33	92.79	90.65	97.70	97.92	94.39	79.03	98.18	100.90	102.50	98.59
CO	8635.20	7249.55	8169.93	7981.42	8602.15	8621.43	8310.90	6956.74	8645.18	8984.25	9024.94	8681.00
NES Usage (Mscf)	222.388	240.330	262.280	166.420	156.505	161.222	154.076	142.108	205.141	234.549	239.243	221.239

GE LM-2500-33 GAS TURBINE			EMISSION FACTORS	
EMISSION SUBTOTALS			GAS	FUEL OIL
			LBS/MMCF	LBS/MGAL
1892.20	MMCF			
0.00	MMCF			
26774.67	LBS	13.39 TONS	14.15	1.84
42867.17	LBS	21.43 TONS	CEM	CEM
11542.39	LBS	5.77 TONS	6.10	3.10
1135.32	LBS	0.57 TONS	0.60	24.41
89964.71	LBS	49.88 TONS	52.83	4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	12											
	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Jan-12	Feb-12
Fuel Gas (MMCF)	0.095	1.334	0.453	0.104	0.000	0.252	0.170	1.336	0.117	0.212	0.132	0.000
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	1.28	17.94	6.10	1.40	0.00	3.39	2.29	17.97	1.57	2.85	1.78	0.00
NOx	4.83	67.95	23.10	5.32	0.00	12.83	8.68	68.06	5.96	10.81	6.75	0.00
PM	0.72	10.14	3.45	0.79	0.00	1.91	1.29	10.15	0.89	1.61	1.01	0.00
SOx	0.06	0.80	0.27	0.08	0.00	0.15	0.10	0.80	0.07	0.13	0.08	0.00
CO	29.41	413.54	140.57	32.36	0.00	78.10	52.70	414.16	36.27	65.79	41.07	0.00

BABCOCK & WILCOX BOILERS			EMISSION FACTORS	
EMISSION SUBTOTALS			GAS	FUEL OIL
			LBS/MMCF	LBS/MGAL
4.21	MMCF			
0.00	MMCF			
214.27	LBS	0.03 TONS	13.45	1.60
31.97	LBS	0.11 TONS	50.94	20.74
2.52	LBS	0.02 TONS	7.60	2.00
1303.96	LBS	0.65 TONS	310.00	43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)	
ROC	14.88 TONS
NOx	33.38 TONS
PM	8.73 TONS
SOx	25.01 TONS
CO	57.59 TONS

EMISSION TOTALS	
ROC	26831.15 LBS
NOx	43081.44 LBS
PM	11574.36 LBS
SOx	1137.84 LBS
CO	101268.67 LBS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	12											
	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Jan-12	Feb-12
Maintenance	0.20	0.00	0.10	0.00	0.20	0.30	0.00	0.00	0.00	0.00	0.20	0.00
Emergency	0.00	10.20	0.00	0.00	0.00	0.00	1.00	0.00	9.40	1.60	0.00	0.00

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

TOTAL HOURS	
Maintenance	1.00 HOURS
Emergency	22.20 HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	137,224	154,646	151,077	162,827	157,314	131,720	170,830	164,320	154,600	164,320	164,320	154,600
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	1941.72	2188.23	2137.75	2304.00	2309.17	2225.99	1953.83	2315.53	2379.56	2417.24	2325.12	2329.09
NOx	3244.77	3833.1	3415.49	3136.83	3015.65	3137.73	2933.85	3784.42	4124.09	4101.06	3931.13	4003.5
PM	837.07	943.34	921.57	993.24	985.47	959.62	903.49	988.21	1025.82	1042.06	1002.35	1004.06
SOx	82.33	92.79	90.65	97.70	97.92	94.39	79.03	98.18	100.90	102.50	98.59	98.76
CO	7249.55	8169.93	7981.42	8602.15	8621.43	8310.90	6958.74	8645.18	8884.25	9024.94	8681.00	8695.82
NH3 Usage (KSCF)	240.330	262.280	166.420	158.508	161.222	154.076	142.108	206.141	234.549	239.243	221.239	217.419

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	1.34	0.453	0.104	0.000	0.252	0.170	1.336	0.117	0.212	0.132	0.000	0.243
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	17.94	6.10	1.40	0.00	3.36	2.29	17.97	1.57	2.85	1.78	0.00	3.27
NOx	67.85	23.10	5.32	0.00	12.83	8.68	68.06	5.86	10.81	6.75	0.00	12.38
PM	10.14	3.45	0.79	0.00	1.91	1.29	10.15	0.89	1.61	1.01	0.00	1.85
SOx	0.80	0.27	0.06	0.00	0.15	0.10	0.80	0.07	0.13	0.08	0.00	0.15
CO	413.54	140.57	32.36	0.00	78.10	52.70	414.16	36.27	65.79	41.07	0.00	75.33

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.10	0.00	0.20	0.30	0.00	0.00	0.00	0.00	0.20	0.00	0.00
Emergency	10.20	0.00	0.00	0.00	0.00	1.00	0.00	9.40	1.60	0.00	0.00	14.50

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines, Attachment ATCM In-Use Emergency Engines

GE LM-2500-33 GAS TURBINE			
EMISSION SUBTOTALS		EMISSION FACTORS	
1839.56	MMCF	GAS	FUEL OIL
0.00	MMCF	LBS/MMCF	LBS/MGAL
26737.24	LBS	13.37 TONS	14.15
42663.07	LBS	21.33 TONS	CEM
11526.30	LBS	5.76 TONS	6.10
1133.73	LBS	0.57 TONS	0.60
98825.32	LBS	49.91 TONS	52.83
			4.45

BABCOCK & WILCOX BOILERS			
EMISSION SUBTOTALS		EMISSION FACTORS	
4.35	MMCF	GAS	FUEL OIL
0.00	MMCF	LBS/MMCF	LBS/MGAL
58.57	LBS	0.03 TONS	13.45
221.82	LBS	0.11 TONS	50.94
33.09	LBS	0.02 TONS	7.80
2.61	LBS	0.00 TONS	0.50
1349.86	LBS	0.67 TONS	310.00
			43.92

EMISSION TOTALS	
26795.81	LBS
42884.89	LBS
11559.39	LBS
1136.35	LBS
101175.20	LBS

PERMITTED CONDITIONS (PER YEAR)	
14.88	TONS
33.38	TONS
8.73	TONS
25.01	TONS
57.99	TONS

TOTAL HOURS	
0.80	HOURS
36.70	HOURS

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

Attachment PO1267PC1
Usage Log for Solvent Cleaning

Material Name	Material ID	Manufacturer	Date of MSDS	Size [oz]	Quantity Used	ROC Content [lb/gal]	ROC [lb]
Aerosol Penetrating Oil		Kano Labs	3/30/2001	10	0	5.01	0.00
Aerosol Surface Cleaner	M715	Gunk	1/12/2006	14	36	3.67	14.45
Aerosol paint remover	7764T21	Diversified Brands	8/17/1998	15	0	2.31	0.00
						Annual Total ROC [lb]	14.45
						Rule 23 ROC limit [lb]	200



October 11, 2011

Lyle Olson
Environmental Engineer, Compliance Section
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Re: Projected Shutdown Schedule for CY 2012

Mr. Olson,

In compliance with Title V Attachment PO1267PC2 Section 9, the proposed shutdown schedule for CY 2012 is submitted as follows:

Month	Start		End		Total Hours
	Day	Time	Day	Time	
Jan	14	0600	14	1800	12
Feb	18	0600	18	1800	12
Mar	17	0600	17	1800	12
Apr	14	0000	17	2400	96
May	12	0600	12	1800	12
Jun	16	0600	16	1800	12
Jul	14	0600	14	1800	12
Aug	11	0600	11	1800	12
Sep	15	0600	15	1800	12
Oct	13	0000	16	2400	96
Nov	10	0000	10	2400	12
Dec	15	0600	15	1800	12

The above schedule is for planning purposes only and is subject to change due to the maintenance and operational requirements of the facility.

Sincerely,

Dr. A. Michael Berman
Interim Vice President



November-18, 2011

Memorandum to File

Re: Annual Gas Turbine and Standby boiler Opacity Survey

1. On November 18, 2011 from 08:00 to 14:00, Delta Air Quality Services, Inc. conducted the annual source testing of the Gas Turbine while the unit was running at normal full load operation. Three one-hour emissions data runs were taken. The HRSG exhaust stack was inspected for visible emissions. There were no visible emissions observed at the HRSG exhaust stack.
2. On November 30, 2010 from 14:00 to 17:00, the Delta Air Quality Services, Inc. conducted the Bi-annual source testing of the Standby Boiler Units. The boiler stacks were inspected for visual emissions during the entire test run. The boilers operated with no visible emissions at each stack.

A handwritten signature in black ink, appearing to read 'Jeffery M. Smith'.

Jeffery M. Smith
Plant Manager
CI Power

Solvent Cleaning – Material List

Solvent Name	Manufacturer's Description	ROC Content	ROC Partial Pressure	Intended Use	ROC Limit *
Aerosol Paint Remover	Diversified Brands #7764T21	277 g/l	Unknown	Maintenance cleaning	900 g/l
Aerosol Penetrating Oil	Kano Labs	60% by volume	Unknown	Rust Penetrator	900 g/l
Aerosol Surface Cleaner	Gunk M715	44% by volume	Unknown	Maintenance cleaning	900 g/l

* Notes:

- 1) ROC content limit is 900 grams per liter and ROC composite partial pressure limit is 20 mmHg at 20°C for repair and maintenance cleaning.
- 2) ROC limit is 950 grams per liter and ROC composite partial pressure limit is 35 mmHg at 35°C for cleanup including cleaning of application equipment.
- 3) ROC limit is 70 grams per liter for manufacturing or surface preparation.

Attachment Rule 74.2
Usage Log for Architectural Coatings and Thinners

Material Name	Material ID	Manufacturer	Date of MSDS	Size [oz]	Quantity Used	ROC Content [g/l]	Usage	Exemption or ROC Limit [g/l]	ROC Content as Applied [lb/gal]	ROC [lb]
Rust Inhibitor High temp. aerosol paint (Aluminum)	Conquest	Chemsearch	7/21/2009	32	12	18	Rust preventative coating	400	0.15	0.45
Galvanizing Compound (aerosol)	Z635	Aerove	3/11/2008	11	36	644	Aerosol coating	Rule 74.2 F.2	5.37	16.63
Syn-Lustro gunmetal gray	141	Aerove	10/10/2010	13	0	295	Aerosol coating	Rule 74.2 F.2	2.46	0.00
Syn-Lustro tawny yellow	10-12-1	Dunn- Edwards	4/1/1999	128	3	390	Rust Preventative Alkyd Enamel Coating	400	3.25	9.76
Syn-Lustro Meadow Green	10-M	Dunn- Edwards	4/1/1999	128	0	390	Rust Preventative Alkyd Enamel Coating	400	3.25	0.00
Syn-Lustro Safety Green	10-27	Dunn- Edwards	4/1/1999	128	0	390	Rust Preventative Alkyd Enamel Coating	400	3.25	0.00
High temp. aerosol paint (Primer)	10V-11-1	Dunn- Edwards	4/1/1999	128	0	390	Rust Preventative Alkyd Enamel Coating	400	3.25	0.00
High temp. aerosol paint (Black)	V2169838	Krylon	11/28/2010	15	5	760	Rust preventative coating	Rule 74.2 F.2	6.34	3.72
Irish Green	V2177838	Rustoleum	6/6/2008	15	17	760	Rust preventative coating	Rule 74.2 F.2	6.34	12.63
Hi Vis Yellow	10-24	Dunn- Edwards	4/1/1999	128	0	390	Rust Preventative Alkyd Enamel Coating	400	3.25	0.00
Brown	40465	Dunn- Edwards	4/1/1999	128	0	390	Rust Preventative Alkyd Enamel Coating	400	3.25	0.00
Navajo White	W705u	Dunn- Edwards	4/1/1999	128	0	140	Industrial Maintenance Coating	250	1.17	0.00
Metal Grain	W705l	Dunn- Edwards	4/1/1999	128	0	140	Industrial Maintenance Coating	250	1.17	0.00
Precaution Blue	10-27	Dunn- Edwards	4/1/1999	128	0	390	Rust Preventative Alkyd Enamel Coating	400	3.25	0.00
Paint Thinner	10-22	Dunn- Edwards	4/1/1999	128	0	390	Rust Preventative Alkyd Enamel Coating	400	3.25	0.00
		Bortz	11/9/1992	128	3	760	Thinner	N/A	6.51	19.53
									Annual total ROC [lb]	63
									Rule 23 ROC limit [lb]	200

Jan 20 04 04:17p WBBM

801-489-0902

p.2

3/27/2009

RMP Reporting Center
P.O. Box 1515
Lanham-Seabrook, Maryland 20703-1515
Attention: RMP De-registration

Re: De-registration of EPA Facility ID#: 1000 0005 2006

Reason for De-registration: Source reduced inventory of all regulated
substances below TQs

OLS Energy-Camarillo Cogeneration Facility
1947 W. Potrero Drive
Camarillo, CA 93010

Ventura County (111)

Effective date of De-registration: 03/27/2009

I certify the above stationary source as of the above effective date is no longer covered by the
Risk Management Plan, 40 CFR Part 68.


Signature

VICE PRESIDENT
Title

4/1/09
Date