FACILITY PERMIT TO OPERATE
NM MILLIKEN GENCO, LLC

SECTION I: PLANS AND SCHEDULES

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules specified below. The operator shall comply with all conditions specified in the approval of these plans.

Documents pertaining to the plan applications listed below are available for public review at AQMD Headquarters. Any changes to plan applications will require permit modification in accordance with Title V permit revision procedures.

List of approved plans:

Application	Rule
486800	1110.2

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - Title V Permits; Rule 3004(a)(10)(C). For equipment subject to a variance, order for abatement, or alternative operating condition granted pursuant to Rule 518.2, equipment specific conditions are added to the equipment in Section D or H of the permit.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 · www.aqmd.gov

Facility ID: 129661
Date: January 13, 2012

COMPANY NAME: NM MILLIKEN GENCO LLC
MAILING ADDRESS: 3005 DOUGLAS BLVD., STE. 105
ROSEVILLE, CA 95661

ATTENTION: MR. ANTHONY J. FALBO, VP & GENERAL MANAGER

APPLICATION NUMBER: **486800**

RULE 1110.2 (f) (1) (D) INSPECTION AND MONITORING (I & M) PLAN FOR THE FACILITY LOCATED AT 2050 S. MILLIKEN AVENUE, ONTARIO, CA 91761.

Please refer to the application you submitted for the evaluation of your Inspection and Monitoring (I & M) plan under District Rule 1110.2 (f) (1) (D), for the facility described above.

The Rule 1110.2 Inspection & Monitoring plan you submitted has been APPROVED.

A copy of your approved plan, together with any addendum, statements or declarations you provided during the evaluation of your plan, is attached. In accordance with Rule 1110.2 (f)(1)(D)(ix), any change in equipment, control equipment, operating conditions or emission limits will require that you submit an application to the District for the revision of your I & M plan.

If you have any questions about this approval, please call Mr. Ray Ronquillo at (909) 396-3049.

Very truly yours,

Charles Tupac, P.E.
Air Quality and Compliance Supervisor
Refinery and Waste Management Unit

Enclosure(s)

FORTISTAR Methane Group
NM Milliken Genco Energy LLC.

Rule 1110.2 Inspection and Monitoring Plan

1.0 Introduction:

The South Coast Air Quality Management District (SCAQMD) modified Rule 1110.2 in February 2008. This rule applies to Internal Combustion Engines (ICEs) that are rated higher than 50 HP. The modified version of this rule included several new requirements including the requirement for an Inspection and Monitoring (I&M) Plan for ICEs that met certain criteria. ICEs that do not have a continuous emission monitoring system (CEMS) for NOx and CO are required to implement a SCAQMD approved I&M Plan to assure continued compliance of the engines between the required annual source tests.

The ICEs at NM Milliken Genco Energy LLC. are equipped with a NOx CEMS but do not have CEMS for CO. Therefore, an I&M Plan focused on CO monitoring is required for the site.

Rule 1110.2 states that an I&M Plan, if required, be submitted to the SCAQMD by August 1, 2008. The approved plan will be effective December 1, 2008. As required by the Rule, NM Milliken Genco Energy LLC. is submitting a completed form 400-A, a compliance plan for CO emissions and a check in the amount of $505.35 towards filing and review fees as required by Rule 306.

2.0 Facility Description:

NM Milliken Genco Energy LLC. is located at 2050 S. Milliken Avenue, Ontario, California and is identified by the SCAQMD with Facility ID 129661. Two landfill gas fired ICEs are being operated at this facility. A Title V permit was issued by the SCAQMD for this facility on December 21, 2007. The facility is current with its reporting as required by the Title V permit.

3.0 Inspection and Monitoring Plan:

3.1 Engine Parameters affecting CO emissions:

Rule 1110.2 requires identification of engine operating parameters necessary to keep pollutant concentrations within rule limits. CO emissions from ICEs at NM Milliken Genco LLC. can be gauged by reviewing the exhaust temperature and the percent oxygen data. Both these parameters are/will be recorded continuously for the engines using a SCADA system.

An operating range will be established based on exhaust stack temperature and oxygen data recorded during the most recent compliant annual source test. This range will be set at + or – 15% of the average concentrations measured during the source test. Parameters outside the operating range will be considered to potentially cause an exceedence of CO emissions at the engines.

3.2 Quarterly Emission Checks:

The Rule requires all lean burn engines equipped with a NOx CEMS subject to a CO limit more stringent than 2000 ppmvd to perform quarterly or every 2000 hour CO emissions checks. The operator can chose the limit that results in the later date for testing. The portable analyzer used for this testing shall be calibrated, maintained and operated in accordance with manufacturer's specifications and recommendations. The SCAQMD is in the process of preparing a Protocol for Periodic Monitoring of Nitrogen Oxides, Carbon Monoxide, and Oxygen from the Stationary Engines for ICEs subject to Rule 1110.2. This Protocol, when available and finalized, shall be followed for quarterly CO emission checks.

NM Milliken Genco Energy LLC. plans to utilize a portable emission analyzer (such as a COSA Model 704 or an ECOM) for quarterly CO emission monitoring. The specification for this analyzer will be maintained as Attachment A to this I&M Plan (as a placeholder, an ECOM information sheet is provided). Further, an experienced, SCAQMD trained operator will perform the emission check each quarter. SCAQMD is in the process of developing a training program for operators for this purpose. Once available, operators responsible for quarterly testing will ensure they get certified by SCAQMD as required.

3.3 Daily Monitoring

Using the existing proprietary SCADA system at the facility, operators will record the following parameters on a daily basis:

1. Engine load
2. Fuel flowrate
3. Engine elapsed time meter operating hours
4. Set points (Maximum and Minimum) and acceptable range of percent Oxygen
5. Set points (Maximum and Minimum) and acceptable range of exhaust temperature and
6. Operating hours since last CO emission check

3.4 Procedures for Breakdown/Malfunction Events:

The procedures mentioned in Rule 1110.2 and clarified in the compliance guide will be followed during breakdown and malfunctions. Specifically;

1. For breakdowns resulting in rule violations or exceedence of permitted CO emission limits, a notification will be made to AQMD as required by the R1110.2 Periodic Monitoring Protocol. For excess CO emissions recorded during routine quarterly emission checks, the operator will immediately retest the engine with the portable analyzer to confirm the first reading obtained. If the reading is confirmed to be a violation, an attempt will be made to expeditiously resolve the problem within 24 hours of detection and conduct an emissions check to confirm compliance. If trouble shooting is not successful, the ICE will be shutdown awaiting diagnostics and repair.

2. For malfunctions that do not result in excess CO emissions, the operator will attempt to correct the problem and conduct an emissions check within 48 hours of initial knowledge of the problem using the calibrated portable analyzer mentioned in 3.2 above.

Operators will follow manufacture recommended procedures, detailed in the Operation and Maintenance (O&M) Manual, during trouble shooting and maintenance of the ICEs.

3.5 Preventative Maintenance

Operators at NM Milliken Genco Energy LLC. conduct routine maintenance of the ICEs according to manufacturer's recommendations. In addition to the annual major maintenance of the ICEs, daily, weekly and quarterly maintenance is conducted. The ICEs are maintained constantly to ensure that they function as designed and in compliance with the emission limits dictated by SCAQMD rules and permit limits.

3.6 Reporting Requirements

Oxygen and exhaust temperature are being used as a surrogate for CO emission monitoring. If these parameters exceed the operating range identified in 3.1 above (+ or – 15% of that recorded during the most recent compliant source test) or CO emission checks have indicated exceedences, the operator shall comply with the following requirements:

a. For excess emissions caused by a breakdown, we will notify AQMD at 1-800-CUT-SMOG within one hour of learning of the breakdown in the same manner required by paragraph (b)(1) of Rule 430. This report is not required if there is no breakdown.

b. Within 24 hours or the end of an operating cycle, whichever is sooner; we will correct the problem and demonstrate compliance with another emission check or shut down the engine for diagnostics and repair.

c. Comply with all other requirements of Rule 1110.2 (f)(1)(H) if there was a breakdown.

d. Since NM Milliken is a Title V facility, we will also notify AQMD at 1-800-CUT-SMOG within 72 hours of learning of learning of any emission exceedance and submit a written report with 14 days using Form 500-N Deviations, Emergencies & Breakdowns.

This rule also requires the submittal of Quarterly Compliance Reports in a format approved by SCAQMD. Such reports are required to be submitted within 15 days of the end of the calendar quarter. Attachment C presents the form developed by SCAQMD for Quarterly Reporting – Rule 1110.2 – Quarterly Report for Stationary Engines. NM Milliken Genco Energy LLC. is in compliance with this reporting requirement and such quarterly reporting will continue.

ATTACHMENT A

PORTABLE EMISSIONS ANALYZER BROCHURE

ECOM A-PLUS

Portable Emission Analyzer

- Measures O_2, CO, NO_X, "Low NO_X", SO_2, & Combustibles
- CO_2, Efficiency & Excess Air Calculations
- Stack Temperature and Draft Measurement
- Large backlit LCD display
- On - board impact printer
- Thermoelectric Gas cooler & automatic moisture drain
- In-line flowmeter with 2.5+ lpm pump
- Automatic purge / Sensor overrange protection
- Advanced DAS 2.0 software compatible

Both the EPA / ETV (Environmental Technology Verification) program and the South Coast Air Quality Management District, (SCAQMD) have documented the exceptional performance of the A-PLUS. The unit also meets the criteria of the EPA CTM protocols for portable EC based analyzers and EPA's 40CFR Part 60 Update of Continuous Instrumental Test Methods, Final Rule.

The ECOM A-PLUS portable emission analyzer offers affordable "compliance level" performance in a rugged, easy to use package. The A-PLUS features an advanced Sample Conditioning system, incorporating an optional heated sample line, thermoelectric Peltier Gas Cooler, and peristaltic pump for continuous moisture removal.

The A-PLUS can be fitted with sensors to measure O_2, CO, NO, NO_2, SO_2, and Combustibles, along with gas and ambient temperatures, stack draft & pressure, plus calculations of CO_2, efficiency, dew point and excess air. A special Low NOx version of the A-PLUS is designed for single digit NO_X measurements with resolution to 0.1 PPM! In addition, the A-PLUS can be fitted with USB for use with ECOM's Advanced DAS Compliance Testing Software for complete emissions analysis.

Housed in a high quality, aluminum reinforced case, the A-PLUS comes complete with a standard sample line and probe, internal battery, AC power cord, thermocouple, spare filters, extra printer paper, quick reference User Card, and Operation Manual.

ETV

ECOM America, Ltd.
1628 Oakbrook Drive
Gainesville, GA 30507
Toll Free: **877.326.6411**
Tel: 770.532.3280
Fax: 770.532.3620
info@ecomusa.com
www.ecomusa.com

Technical Specifications

ECOM A-PLUS

MEASUREMENT (KEY)	RANGE	ACCURACY	RESOLUTION	SENSOR LIFE	SENSOR TYPE
Oxygen (O)	0-21% vol.	± 2% Measured	0.1% vol.	2 Years	Electrochemical
Carbon Monoxide (C)	0-4,000 ppm	± 2% Measured	1 ppm	3 Years	Electrochemical
Carbon Monoxide (V)	0-40,000 ppm	± 2% Measured	1 ppm	3 Years	Electrochemical
Nitric Oxide (N)	0-4,000 ppm	± 2% Measured	1 ppm	3 Years	Electrochemical
Nitric Oxide (.N)	0-400 ppm	± 2% Measured	0.1 ppm	3 Years	Electrochemical
Nitrogen Dioxide (X)	0-500 ppm	± 2% Measured	1 ppm	3 Years	Electrochemical
Nitrogen Dioxide (.X)	0-50 ppm	± 2% Measured	0.1 ppm	3 Years	Electrochemical
Sulfur Dioxide (S)	0-5,000 ppm	± 2% Measured	1 ppm	3 Years	Electrochemical
Combustibles (H)	0-6.00 % vol.	± 2% Measured	0.01% vol	5 Years	Pellister
Gas Temperature	32-1800 F	± 2% Measured	1 deg F	10 Years	NiCrNi
Ambient Temperature	0-250 F	± 2% Measured	1 deg F	10 Years	Semi-conductor
Draft / Pressure	± 40" H_2O	± 2% Measured	0.1% H_2O	10 Years	DMS
O_2 Correction	0-20% Oxygen				
Smoke Scale	0-9				
Carbon Dioxide CO_2	0-CO_2 max of fuel	Calculated			
Efficiency	0-99.9%	Calculated			
Excess Air (Lambda)	1-infinity	Calculated			

*ACCURACY: When calibrated prior to use per ECOM America, Ltd. specifications.

Physical

Instrument: 16" x 10" x 12" Aluminum Carry Case
Probe: 13" Length x 3/8" OD Inconel w/ Pistol Grip Handle*
Sample Line: 15' high-temp flex hose w/thermocouple wire*
Weight: 28 lbs.

Electrical

AC: 110/220V 50/60Hz (User selectable)
Batteries: 12V lead-acid, 2-3 hour life
Pump: Flow rate of 2.5 lpm
Display: Backlit, adjustable contrast & zoom, displays all parameters simultaneously.

Operating Temperature

Core temperature of the instrument is monitored continuously. Internal Temperature Compensation software assures accurate sensor response over the range of 20°F to 104°F.

*Optional probe & sample line lengths are available

Order Information

ECOM A-PLUS

A-PLUS is available with 2-5 sensors. Common configurations include:

2-3 Gas	4 Gas	5 Gas
OC	OCNX	OCVNX
OCN	OCNX	OCVNX
		OCNXH
		OCNXS
		OCNXS
		OCNXH

Consumables:
Water Trap / Particulate Filters, NO_2 / SO_2 Filter Media, Printer Paper / Printer Ribbon

Parts & Accessories:
Transport / Shipping Cases, Refillable Calibration Gas Bottles, Heated Sample Line, Data Acquisition Software

ECOM America Ltd. has built an outstanding reputation in the industries we serve by providing a high quality product and responsive technical support to our customers. We maintain a large inventory of analyzers and parts to assure fast delivery of new items and quick turnaround on service. Always Expect Responsive Customer Support & Service from ECOM!

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ATTACHMENT B

Rule 1110.2 –Quarterly Report for Stationary Engines

South Coast Air Quality Management District

Rule 1110.2 - Quarterly Report for Stationary Engines

Due 15 days after the end of each calendar quarter (January 15, April 15, July 15, October 15)

Fax to 909-396-3343, or Mail to SCAQMD, Attention: Enforcement, P.O. Box 4941, Diamond Bar, CA 91765-0941

Quarter Ended (mm/dd/yyyy) _____ Report Date _____ Page Number ___ of ___

If there were no reportable incidents, enter "None" in box to right, complete Sections I and IV and submit form. ☐

Section I - Facility Information

Permit Issued to (business name of operator that appears on permit): _____ Valid AQMD Facility ID (available on permit or invoice issued by AQMD): _____

Facility Address: _____

City: _____ State: CA Zip Code: _____

Mailing Address (if different): _____

City: _____ State: _____ Zip Code: _____

Name, title and phone number of the person to contact for further information:

Name _____ Title _____ Phone _____

Section II - Previously Reported Engine Breakdowns and Title V Deviations During the Quarter (Attach additional pages if needed.)

Engine Application No.	Type of Incident*	Date of Incident	Date of Written Report

*Enter one of the following: "Breakdown", "Title V Deviation", or "Title V Emergency".

Section III - Other Reportable Incidents During the Quarter (Summarize here, attach additional pages if needed, and complete Section V.)

Engine Application No.	Type of Incident**	Date Operator Learned of Incident

**Enter one of the following: "Air-to-Fuel Ratio Controller Fault or Alarm", "Parameter Out of Range", "Excess Emission Check" or "Other".

Section IV - Certification Statement

I certify under penalty of law that based on information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate and complete.

For Title V Facilities Only: ☐ I also certify under penalty of law that I am the responsible official for this facility as defined in AQMD Regulation XXX.

Signature _____ Title _____ Date _____

Type or Print Name _____ Phone _____ Fax _____

Address _____ City _____ State _____ Zip Code _____

Rule 1110.2 Quarterly Report for Stationary Engines

Facility ID: _____ Quarter Ended (mm/dd/yyyy): _____ Page Number ___ of ___

Section V: Information Regarding Incidents Reported in Section III:

Engine Application No. _____ Engine Description _____

Type of Incident* _____

Incident Description _____

Cause (to extent known) _____

Corrective Action Taken _____

Dates and Times of Events

Incident Began (to extent known) _____ Operator Discovered _____

Corrective Action Started _____ Compliance Achieved _____

Engine Shutdown _____ Engine Restarted _____

	O2, % (dry)	NOx, ppmvd @ 15% O2	CO, ppmvd @ 15% O2
Portable Analyzer Data before Corrective Action (if any)			
Portable Analyzer Data after Corrective Action			

Engine Application No. _____ Engine Description _____

Type of Incident* _____

Incident Description _____

Cause (to extent known) _____

Corrective Action Taken _____

Dates and Times of Events

Incident Began (to extent known) _____ Operator Discovered _____

Corrective Action Started _____ Compliance Achieved _____

Engine Shutdown _____ Engine Restarted _____

	O2, % (dry)	NOx, ppmvd @ 15% O2	CO, ppmvd @ 15% O2
Portable Analyzer Data before Corrective Action (if any)			
Portable Analyzer Data after Corrective Action			

*Enter one of the following: "Air-to-Fuel Ratio Controller Fault or Alarm", "Parameter Out of Range", "Excess Emission Check" or "Other".

(Attach additional pages if needed.)

Ray Ronquillo

From: Scott Overhoff [soverhoff@fortistar.com]
Sent: Wednesday, September 14, 2011 11:23 AM
To: Ray Ronquillo
Cc: 'Suparna Chakladar'; Jonathan Uhl
Subject: RE: Required Forms and Additional Information

Hello Mr. Ronquillo,

Thank you for your patience in receiving a response to your email. Please see the red text below in response to your questions.

Scott Overhoff
Environmental Manager
FORTISTAR
5087 Junction Road
Lockport, New York 14094
Phone: (716) 439-1004 ext. 118
Fax: (716) 439-1000
email: : soverhoff@fortistar.com

From: Ray Ronquillo [mailto:RRonquillo1@aqmd.gov]
Sent: Friday, August 05, 2011 4:58 PM
To: Scott Overhoff
Cc: 'Suparna Chakladar'
Subject: Required Forms and Additional Information

Mr. Overhoff,

Thank you for your email. I guess this is an opportune time for me to clarify/re-state the additional forms and information that I requested during my telephone conversation with Ms. Chakladar a couple of days ago:

NM Prima Deshecha (ID: 117297):

Since this facility is a **Title V facility**, and the addition of the permit for the emergency fire pump engine (A/N 525443) and the Rule 1110.2 I & M plan (A/N 486803) will constitute a revision of the **Title V permit**, I will need the following forms in order to process a Title V permit revision:

1. **Form 400-A** – please indicate in **Section D**, Nos. **6**, **7b** and **9**, that the application is for **"Revision of an existing Title V permit"** (*see attached latest version of 400-A form*)
2. **Form 400-CEQA** – please indicate in **Sections A** and **B** that the application is for **"Revision of an existing Title V permit"** (*see attached latest version of 400-CEQA*)
3. **Forms 500-A2, 500-C1** and **500-C2** – ***I already have these forms***.

As I indicated above, I need the properly completed Forms 400-A and 400-CEQA for Prima Deshecha. As you have done before, please email these forms to me in advance so that I can have our Permit Services Unit prepare the proper application folder.

After examining your **current Title V permit** for this facility, I noticed that Section D, Page 4 listed a **350,000 BTU/HR Landa PHW4-2000 Kerosene-fueled Hot Water Pressure Washer** (PTO# **F29322**; A/N **354977**). I found out that the command-and-control permit (PTO# F29322) for this equipment is already INACTIVE. Is this equipment still in use? If YES and you want to keep it on your Title V permit, then you must contact our Customer Service Dept. at (909) 396-2900 to find out how to reactivate this permit (if possible). Otherwise, I must exclude this equipment from your Title V permit.

The forms have been previously submitted and we have indicated that the Pressure Washer is no longer used. We do want this device removed from the Permit.

Regarding the **Rule 1110.2 I & M Compliance Plans** that I am evaluating for all your 5 facilities, please provide the following additional information:

For: **NM Lopez Energy (ID: 104806)** only:

Since this facility is also a Title V facility, please send to me a statement (via email is fine with me) saying that, under the heading "Reporting Requirements", you "**will also notify AQMD at 1-800-CUT-SMOG within 72 hours of learning of any emission exceedance and submit a written report within 14 days using FORM 500-N – Deviations, Emergencies & Breakdowns**".

For the MM Lopez Facility under the "Reporting Requirements" section...please note that we (MM Lopez Energy) "**will also notify AQMD at 1-800-CUT-SMOG within 72 hours of learning of any emission exceedance and submit a written report within 14 days using FORM 500-N – Deviations, Emergencies & Breakdowns**".

For: **NM Mid Valley (ID: 129660), NM Milliken Genco (ID: 129661) and NM Colton Genco (ID: 129659)** only:

The permits for all the engines located at these three facilities contain two conditions (#9 and #10) that require that:

- #9 – "THE ENGINE SHALL BE EQUIPPED WITH AN AIR TO FUEL RATIO CONTROLLER APPROVED BY THE AQMD", and
- #10 – "THE AIR TO FUEL RATIO MUST BE CHECKED WEEKLY TO ENSURE THAT THE MANUFACTURER SPECIFIED OXYGEN CONCENTRATION IS MAINTAINED. THIS MAINTENANCE SCHEDULE MAY BE CHANGED UPON APPROVAL OF THE AQMD."

These engines are NOT equipped with an AFRC. The permits were issued prior to the current Operating company's management team, therefore it is not clear why these requirements are contained in the permit.

If these engines are indeed equipped with AFRCs, then you must include in your I & M plan the following:

- Make/Model of the AFRC
- Indicate whether the AFRC is set with a single set point, or, with variable set points at variable loads
- Type of oxygen sensor used: Unheated narrow band (EGO), Heated narrow band (HEGO), or Universal Wideband (UEGO)
- Optimum oxygen sensor range setting
- Location of the O_2 sensor: Upstream only, or, Upstream and Downstream
- Specify the procedure for establishing the optimum AFRC set point(s) (note: if variable load, set points at minimum, midpoint and maximum loads)
- Specify the procedure for re-establishing the optimum AFRC set point(s) whenever the set point must be readjusted or within 24 hours after replacing an oxygen sensor.
- Procedure for alerting the operator of any AFRC malfunctions (indicator light and/or audible alarm).

Not Applicable – No AFRC.

If these engines are not equipped with AFRCs, please initiate steps to modify these permits in order to eliminate the AFRC conditions. You must be prepared to justify why an AFRC is not required for each engine.

The permits are currently in for modification and are being reviewed by Jonathan Uhl. We will discuss the necessary modifications with Jon and Charles Tupac. It should be noted that efficient combustion is monitored through use of the required NOx CEMS and quarterly CO monitoring. It should be noted that efficient combustion is monitored through use of the required NOx CEMS and quarterly CO monitoring. Jon has shared a draft of the revised Colton permit with us wherein Conditions 9 and 10 have been revised as follows:

9) THE ENGINE SHALL BE EQUIPPED WITH AN AIR TO FUEL RATIO CONTROLLER APPROVED BY THE AQMD. [RULE 1303(a)(1)-BACT]
THE OPERATOR SHALL KEEP A MONTHLY OPERATING LOG THAT INCLUDES: A. TOTAL HOURS OF OPERATION.
B. TOTAL CUBIC FEET OF LANDFILL GAS CONSUMED. C. CUMULATIVE HOURS OF OPERATION SINCE THE LAST SOURCE TEST. [RULE 1110.2]
10) THE AIR TO FUEL RATIO MUST BE CHECKED WEEKLY TO ENSURE THAT THE MANUFACTURER SPECIFIED OXYGEN CONCENTRATION IS MAINTAINED. THIS MAINTENANCE SCHEDULE MAY BE CHANGED UPON APPROVAL OF THE AQMD.
[RULE 1303(a)(1)-BACT]
THE OPERATOR SHALL REPORT ANY BREAKDOWN RESULTING IN EMISSIONS IN EXCESS OF RULE OR PERMIT LIMITS PER THE REQUIREMENTS OF SCAQMD RULE 1110.2. [RULE 1110.2]

For: **All five facilities** – Lopez Energy, Prima Deshecha, Mid Valley, Milliken Genco and Colton Genco:

Please provide the following additional information:

1. Please explain how you are going to store the data obtained from each portable analyzer test. Please indicate the manner, frequency and format of data storage.

Portable analyzer data is entered manually onto an excel spreadsheet by the individual collecting the measurements. The frequency of the measurements is quarterly for CO. The excel spreadsheets are maintained by the Environmental Department and are available upon request within 4-hours or the next business day. NOx CEMS data is collected continuously and is also maintained by the Environmental Department.

2. Please explain if you have a specific schedule for performing your quarterly CO emission portable analyzer tests. For example, do you plan to do it every first day of the months of January, April, July and October?

The CO measurements are taken on the middle month of every quarter (Feb, May, Jul, Oct.), however this does not preclude taking readings during one of the other months of the quarter when necessary due to any number of unforeseen circumstances.

3. Under "Preventive Maintenance", please provide a list of the items/parameters that are regularly checked (e.g., spark plug replacements, tune ups, oxygen sensor replacement, etc.).

This is a very comprehensive list and is based on the manufacturer recommendation for each type of engine. The equipment manufacturer specifies the necessary maintenance tasks and their frequency. This information is found in the equipment manuals which are maintained at each facility.

4. Please indicate if the NOx CEMS is interfaced with the SCADA system and if the SCADA is programmed to provide instantaneous warnings to the operator when non-compliant NOx emission readings occur (within certain tolerance limits).

The NOx CEMS is interfaced with the SCADA system and there are warnings that alert the operators when a NOx limit has been exceeded. The warnings are in the form of an indicator on the system display. Operators review this data continuously when on site and immediately upon start of shift following unmanned hours.

5. The I & M plan for **Lopez Energy** contained a reporting form called **"Excess CO Emissions Report"**. This report did not appear in the I & M plans for the other 4 facilities. Is there actually such report available for each facility?

This must have been an administrative typographical error. Please delete this statement.

Thank you in advance for your help. Please provide the requested information as soon as possible because we intend to include the approved I & M plans in the Title V permit revisions for your facilities.

Ray Ronquillo
Air Quality Engineer II
South Coast Air Quality Management Distr...
21865 Copley Drive
Diamond Bar, CA 91765

(909) 396-3049 Work
(909) 396-3341 Fax
RRonquillo1@aqmd.gov Email

From: Scott Overhoff [mailto:soverhoff@fortistar.com]
Sent: Friday, August 05, 2011 7:18 AM
To: Ray Ronquillo
Cc: 'Suparna Chakladar'
Subject: Revised Form 400-A's - Fortistar Engine Plant Rule 1110.2 Complaince Plan

Mr. Ronquillo,

Please find attached the revised Form 400-A's related to the Rule 1110.2 Compliance Plans for our engine plant facilities. Please note that the appropriate fees were submitted at the time of submittal. These forms are being submitted only electronically via this email.

The other information that you requested will be forthcoming next week sometime. If you have any questions in the mean time, please do not hesitate to contact me.

Thank you and have a good day,

Scott Overhoff
Environmental Manager
FORTISTAR
5087 Junction Road
Lockport, New York 14094
Phone: (716) 439-1004 ext. 118
Fax: (716) 439-1000
email: : soverhoff@fortistar.com