

APPENDIX A

Proposed Federal PSD Permit for the Russell City Energy Center
Additional Statement of Basis, August 3, 2009

SDG&E – Palomar Energy Center **Summary of Emissions of NOx During Startup Events After Installation of OpFlex**

2006 based upon minute-by-minute NOx data; 2007 as provided by SDG&E

	Date	Start Time	Compliance Time	Total Time	Total Nox lbs	Hours since shutdown
CT1	10/11/2006	7:15	11:58	4:43	735	4 days
	10/12/2006	2:16	4:04	1:48	248	5 hours
	10/13/2006	6:05	7:36	1:31	42	5.5 hours
	16-Oct	6:44	8:03	1:19	107	2 days 13 hours
	17-Oct	6:02	7:00	0:58	48	7 hours
	18-Oct	6:02	6:54	0:52	39	6.5 hours
	11/4/2006	12:24	13:20	0:56	37	2 hours
	11/11/2006	7:03	7:41	0:38	26	6 hours
	11/12/2006	5:39	6:32	0:53	32	5.5 hours
	11/13/2006	6:00	6:54	0:54	34	7 hours
	11/14/2006	4:59	5:49	0:50	32	5 hours
	11/17/2006	4:59	5:55	0:56	28	5 hours
	19-Nov	7:01	7:39	0:38	30	7 hours
	11/26/2006	7:16	8:19	1:03	88	3 days; hot steam turbine
	12/10/2006	8:14	8:37	0:23	22	8 hours
	12/24/2006	6:14	6:38	0:24	24	6 hours
	12/25/2006	8:14	8:43	0:29	31	8 hours

	Date	Start Time	Compliance Time	Total Time	Total Nox lbs	Hours since shutdown
CT1	11/27/2006	10:13	10:41	0:28	28	10 hours
	12/28/2006	9:12	9:40	0:28	23	9 hours
	12/31/2006	7:14	7:39	0:25	23	7 hours
	5/1/2007	9:00	10:51	1:51	145	Regular (Questionable)
	10/22/2007	11:59	13:31	1:32	225	Cold CT; hot ST
CT2	10/12/2006	4:27	6:48	2:21	460	>48 hours
	10/12/2006	12:10	12:33	0:23	12	2 hours
	11/4/2006	13:38	14:10	0:32	17	4 hours
	11/5/2006	7:02	7:55	0:53	39	7 hours
	11/6/2006	5:02	5:47	0:45	39	5 hours
	11/18/2006	6:38	7:35	0:57	40	6.5 hours
	11/23/2006	6:05	6:25	0:20	16	6 hours
	11/27/2006	7:00	7:30	0:30	75	7 hours
	12/11/2006	5:11	5:27	0:16	19	4 hours
	12/23/2006	14:55	15:52	0:57	111	38 hours
	12/29/2006	15:14	15:53	0:39	50	15 hours
	12/30/2006	15:15	15:48	0:33	31	14 hours
	5/7/2007	7:11	8:53	1:42	119	Cold CT; hot ST
	10/22/2007	6:29	11:26	4:57	375	Cold CT; cold ST