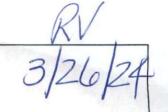
ORIGINAL

SOUTH COAST AOMD CLERK OF THE BOARDS 2024 FEB 13 PM 12: 12

PETITION FOR VARIANCE BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT



PETITI	ONER: COLTON POWER L.P.	CASE NO:6167-4
		FACILITY ID: 182561
FACILI	TY ADDRESS: 671 S. Cooley Dr. on of equipment/site of violation; specify business/co	orporate address, if different, under Item 2, below]
City, St	tate, Zip <u>: Colton, CA, 92324</u>	
1.	TYPE OF VARIANCE REQUESTED (more than one boselecting) INTERIM SHORT REGULAR I	ox may be checked; see Attachment A, Item 1, before EMERGENCY EX PARTE EMERGENCY
2.	CONTACT: Name, title, company (if different than Fauthorized to receive notices regarding this Petition (no	Petitioner), address, and phone number of persons more than two authorized persons).
	Joseph Shephard	Jessica Gammett
	Plant Manager	Environmental Health & Safety
	14950 W Shulte Ave., Tracy, CA Zip 95377	671 S. Cooley Dr., Colton CA, Zip 92324
	2 (925) 766-7356 Ext.	2 (209) 699-0225
	Fax_()	Fax_()
	E-mailjshephard@mrpgenco.com	_E-mailjgammett@mrpgenco.com
3.	RECLAIM Permit Yes No	Title V Permit Yes No
	Persons with disabilities may request this docu the Clerk of the Board at 909-396-2500 or by e	
3	If you require disability-related accommodation contact the Clerk of the Board at least five (5) of	

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4.	GOOD CAUSE: Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)	
	N/A	
5.	Briefly describe the type of business and processes at your facility.	
	Colton Power, LP (Century) is an electric power generating plant which utilizes four simple cycle 10.5 MW natural gas fired combustion turbines. The Facility uses these turbines to generate electricity in times of peak demand and ensure electrical grid reliability for the city of Colton, California.	
6.	List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach only the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.	
	Equipment/Activity Application/ Permit No. RECLAIM Device No. Application/Plan Denied	はなる
	Turbine No. 3, Natural Gas, General Electric, Model 10B-1, 2023 annual ammonia slip testing	
	Attach copy of denial letter	
7.	Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schemat or diagram may be attached, in addition to the descriptive text.	ic
	The Facility must operate the gas turbine to conduct the ammonia slip test, as required by Permit Condition D28.1. The unit is scheduled for an SCR catalyst replacement but repairs cannot be completed until the facili receives a permit to construct. Without the permit to construct it is not possible to comply with Condition D28. by the due date extended by Variance Case No. 6167-4 of March 29, 2024.	
8.	Is there a regular maintenance and/or inspection schedule for this equipment? Yes No	
0.	If yes, how often: Periodic Date of last maintenance and/or inspection 1/18/2024	
	Describe the maintenance and/or inspection that was performed.	
	Prior to December 14, 2023, attempts were made to tune the engine onsite several times. In the interim	-
	between the 7 th and the 14 th , the facility attempted to remotely tune the unit but was not successful. An	
	engineer, one of the few in the world that specializes in these units, was brought in from out of the country ar was able to make the necessary adjustments to allow the unit to start.	d
	was able to make the necessary adjustments to allow the unit to start.	

are seeking variance rel	ief (if requesting va	ariance from Rule 401 or	c section(s) and subsection(s)] from permit condition, see Attachment A see Attachment A, Item 9, Example). Briefly
Rule	等為以 及6935	自然是一种的	Explanation	4.4.4.5.30
203 (b), 2004(f)(1), 300 Permit Condition D28.1	2(c)(1), As requir annual a	red by these rules and cor mmonia slip test by the re	nditions, the Facility will not be able to quired deadline of 12/31/23.	perform the
1134 (e)(2)(C)(iii)		red by this rule, the Facility by the required deadline of	y will not be able to perform the annual f 12/31/23.	al ammonia
Variance Case No. 6 Condition #2	167-4 The facil	ity will not be able to cond	luct the ammonia slip test before Marc	ch 29, 2024.
. Are the equipment or ac	ctivities subject to t	his request currently und	er variance coverage? Yes 🏻	No 🗌
Case No.	Date of Action	Final Compliance Date	Explanation	
6167-4	12/31/2023	03/29/2024	The unit was discovered to be non prior to the annual ammonia slip to variance was granted to extend the slip test deadline from 12/31/2023 3/29/2024.	est. A short e ammonia
. Are any other equipmer coverage? Yes	nt or activities at thi No	is location currently (or w Final Compliance Date	rithin the last six months) under varia	ance
		n or Notice(s) to Comply	concerning this equipment or activit	y within the
. ,				
If yes, you must attach P66096, P66098, P789		ice.		
				20 100
Have you received any within the last six month		ne public regarding the op No 🛛	peration of the subject equipment or	activity
U MAY ATTACH ADDITIONAL PA	GES IF NECESSARY]		PAGE 3 OF 12	

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

The facility is in the process of replacing the SCR Catalyst associated with the unit, D15. The facility submitted an expedited application to install new SCR catalysts on November 21, 2023.

As of February 8th the application had not been sent to the EPA for the 45-day review and therefor will not likely be issued in time for the facility to install the new SCR by the March 29 deadline for ammonia slip testing listed in Variance Case No. 6167-4.

The facility has made every effort to prepare contractors and schedule repairs as quickly as possible and was prepared to have the installation complete and tested for compliance by the end of March 2024 consistent with the existing variance. However, the timing for receiving the SCR permit to construct does not allow the new SCR to be installed and tested by the deadline of March 2024 as anticipated.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

On January 26, 2024 the facility reached out to SCAQMD for a status update regarding the SCR catalyst permit application and was informed that the permit would likely be issued by the end of March. During an internal meeting in early February, facility staff determined that there would not be enough time between receiving the permit to construct and the deadline listed in Variance Case No. 6167-4 to complete the installation and conduct an ammonia slip test.

List date(s) and action(s) you have taken since that time to achieve compliance.

Upon determining that the facility wouldn't receive the permit to construct in time to install the SCR catalyst and test the unit prior to the March 29th deadline, installation of the SCR catalysts and compliance testing was rescheduled.

17.	What would be the harm to your business during and/or after the period of the variance if the variance were not granted?	
	Economic losses: \$ (Not quantifiable at this time.) Any loss would be due to a SCAQMD Notice of Violation for	
	not completing the Ammonia slip test by 3/29/2024.	
	Number of employees laid off (if any): None	
	Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts hardship on customers, layoffs, and/or similar impacts).	ί,
	The ammonia slip test cannot be conducted until the permit to construct is issued and the new SCR catalyst installation has been completed. If the variance is not granted, the Facility would expect to receive a Notice of Violation from SCAQMD for non-compliance. Any economic losses would be as a result of an associated penalty.	
18.	Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.	
	In conjunction with the variance, the facility will not operate except to assess repairs and tune the unit. The CEMS for the unit will remain fully functional while the unit is able to operate.	
19.	Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.	
[YOU	AY ATTACH ADDITIONAL PAGES IF NECESSARY] PAGE 5 OF 12	

Pollutant	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A			
* Column A minus Column B = Column C			
Excess Opacity: N/A %			
Show calculations used to estimate quantities emissions.	s in No. 19, or explain v	why there will be no ex	xcess
The facility will not operate except to asses CEMS, and the pollution control devices will			
Explain how you plan to reduce (mitigate) excleasible, or why reductions are not feasible.	cess emissions during t	he variance period to	the maximum extent
See Item #20.			
How do you plan to monitor or quantify emiss period, and to make such records available to RECLAIM facilities from applicable missin	the District? Any prop		
The CEMS and pollution control devices w	ill remain functional wh	ile the unit is evailable	a to operate. Any
emissions from the unit would be captured		ne the unit is available	e to operate. Any

How do you intend to achieve sampliance will	th the rule(s) and/or	mit condition(s)Q In-	ludo o dotailad
How do you intend to achieve compliance wit description of any equipment to be installed, to be amended, etc., dates by which the action	modifications or proces	s changes to be mad	e, permit conditions

PAGE 6 OF 12

20.

21.

22.

23.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

date by which yo If the regular vari specifying dates	ou are requesting the variance to u expect to achieve final compliance is to extend beyond one your or time increments for steps ne Progress (see Attachment A, It	year, you must include a geded to achieve compli	a Schedule of Inc	crements of Progres
	s of Progress here:			
variance petition	any District personnel with who	on or Notice to Comply.		
variance petition	any District personnel with who or any related Notice of Violatio hilip Nguyen	on or Notice to Comply. Ext.	2722	
If the petition wa Name The undersigned	or any related Notice of Violation	en or Notice to Comply. Ext. Ext. Ext. than the petitioner, plea	2722 ase provide their n	name and title below.
If the petition wa Name The undersigned	or any related Notice of Violatic hilip Nguyen s completed by someone other Company I, under penalty of perjury, state	ExtExtExtext.	ase provide their n Title	name and title below.
If the petition wa Name The undersigned therein set forth,	s completed by someone other Company I, under penalty of perjury, state is true and correct. 2/12/2024	ExtExtExtextextextextextextextextextextextextextextextextextext.	ase provide their notitle Title n, including attach	name and title below.

Attachment A

Minute order from Short Variance Case No. 6167-4

BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT MINUTE ORDER

COLTON POWER, LP 671 S. Cooley Drive, Colton, CA 92324

Case No: 6167-4

Facility ID: 182563

Incorrect Facility ID. Colton Century FID:

182561

Hearing Date: 01/11/2024

Hearing Type: Short

Consent Calendar: Yes

HEARING BOARD ACTION

Action: Granted

Starting Date: 12/31/2023

Ending Date: 03/29/2024

RULES

203(b) (from Condition D28.1 of Facility Permit to Operate No. 182561)

1134(e)(2)(C)

2004(f)(1) {from Condition D28.1 of Facility Permit to Operate No. 182561}

3002(c)(1) {from Condition D28.1 of Facility Permit to Operate No. 182561}

EQUIPMENT DESCRIPTION

DEVICE/APPLICATION/PERMIT

Turbine No. 3

D15

CONDITIONS

- Petitioner shall complete the repair of Turbine No. 3 (Device No. D15) expeditiously and provide
 a notification when the repair is complete to the South Coast AQMD via email to AQ Engineer
 Philip Nguyen (pnguyen2@aqmd.gov), AQ Inspector Avelino Revilla arevill@aqmd.gov), and
 Supervising AQ Inspector Thomas Lee (tlee2@aqmd.gov).
- Petitioner shall conduct the ammonia slip test in accordance with permit condition D28.1 within 14 operating days after Turbine No. 3 (DeviceD15) is returned to service, and before March 30, 2024.
- Petitioner shall notify the South Coast AQMD by calling -800-CUT-SMOG and by sending an
 email to AQ Inspector II Avelino Revilla (<u>arevilla@aqmd.gov</u>), Supervising AQ Inspector
 Thomas Lee (<u>tlee2@aqmd.gov</u>), and AQ Engineer Philip Nguyen (<u>pnguyen2@aqmd.gov</u>) at least
 24 hours prior to starting the ammonia slip test.
- 4. Petitioner shall submit a complete source test report showing preliminary compliance with ammonia slip conditions to the South Coast AQMD Source Testing (sourcetesting@aqmd.gov)

BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT MINUTE ORDER

COLTON POWER, LP 671 S. Cooley Drive, Colton, CA 92324

Case No: 6167-4

Facility ID: 182561

Hearing Date: 01/11/2024

Hearing Type: Short

Consent Calendar: Yes

HEARING BOARD ACTION

Action: Granted

Starting Date: 12/31/2023

Ending Date: 03/29/2024

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203(b) (from Condition D28.1 of Facility Permit to Operate No. 182561)

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EQUIPMENT DESCRIPTION DEVICE/APPLICATION/PERMIT

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- 3. Petitioner shall notify the South Coast AQMD by calling -800-CUT-SMOG and by sending an email to AQ Inspector II Avelino Revilla (arevilla@aqmd.gov), Supervising AQ Inspector Thomas Lee (<u>tlee2@aqind.gov</u>), and AQ Engineer Philip Nguyen (<u>pnguyen2@aqind.gov</u>) at least 24 hours prior to starting the ammonia slip test.
- 4. Petitioner shall submit a complete source test report showing preliminary compliance with ammonia slip conditions to the South Coast AQMD Source Testing (sourcetesting@aqmd.gov)

- and to AQ Inspector II Avelino Revilla (arevilla@aqmd.gov) and Supervising AQ Inspector Thoms Lee (tlee2@aqmd.gov) within 45 calendar days after the test date.
- 5. Petitioner shall operate the Continuous Emissions Monitoring System (CEMS) to continuously monitor the exhaust from the Turbine No. 3 (Device ID N. D15) and record all required parameters (i.e., NOx concentration, oxygen content, and fuel flow) pursuant to Rule 2012, Appendix A, Chapter 2 for the duration of the variance period including showing valid zeros or all parameters when the turbine is not operating. In lieu of the abovementioned requirement, the Petitioner may choose to comply with the requirements in Rule 2012(c)(2)(D) and 2012(c)(2)(E), as amended on November 3, 2023.
- Petitioner shall notify the Clerk off the Board at <u>clerkofboard@aqind.gov</u> when final compliance is achieved.

EXCESS EMISSIONS

None

Failure to comply in full with any and all conditions and increments of progress may result in modification or revocation of this order by the Hearing Board, and/or enforcement actions by the South Coast AQMD.

REMINDER

In the event petitioner will be unable to comply with the final compliance date, a petition requesting a modification and extension of the variance may be filed. To meet notice requirements, the petition must be filed no later than ... In the event the hearing is not needed and taken off calendar, petitioner may request a refund of 50% of the filing fee, however, petitioner will be responsible for the publication fee.

Present:

WARRY STATES IN A SECTION OF STATES

Cynthia Verdugo-Peralta, Chair Robert Pearman, Esq., Vice Chair Jerry P. Abraham, M.D., MPH, CMQ Micah Ali Mohan Balagopalan

Representing the Petitioner: No Appearance

Representing the Respondent: No Appearance

Colton Power, L.P. Case No. 6167-4

Petitioner's Exhibits:	#1 - Stipulation to Place Matter on Consent Calendar *#2 - Declaration of Joseph Shepherd #3 - Proposed Findings and Decision
Hearing Board's Exhibis:	HB-I - Email from Balagopalan to the Parties
*Entered Into Evidence	
Motion:	Balagopalan/Ali 5-0
Board Review/Ap	proval Mohan Balagopalan
	Dated

Prepared by: Altheresa Rothschild

Attachment B

TV Permit Condition D28.1



South Coast Air Quality Management District 21865 Copley Drive, Diamond Bar, CA 91765-4178

Section D Page: 19
Facility ID: 18256
Revision #:
Date: October 09, 2020

FACILITY PERMIT TO OPERATE COLTON POWER, LP

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The operator shall also install and maintain a device to continuously record the parameter being measured.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 10-20-2000; RULE 2005, 6-3-2011]

[Devices subject to this condition: C5, C12, C19, C26]

D12.5 The operator shall install and maintain a(n) pressure gauge to accurately indicate the pressure across the SCR catalyst bed in inches of water column.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

The operator shall maintain the pressure drop accross the SCR bed between 2 and 5 inches of water column

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 10-20-2000; RULE 2005, 6-3-2011]

[Devices subject to this condition: C5, C12, C19, C26]

D28.1 The operator shall conduct source test(s) in accordance with the following specifications:



South Coast Air Quality Management District 21865 Copley Drive, Diamond Bar, CA 91765-4178

Section D Page: 2 Facility ID: 1825 Revision #:

Date: October 09, 2020

FACILITY PERMIT TO OPERATE COLTON POWER, LP

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

The test shall be conducted and the results submitted to the District within 60 days after the test date.

The test shall be conducted at least quarterly during the first twelve months of operation and at least annually thereafter. If an annual test is failed, four consecutive quarterly source tests must demonstrate compliance with the ammonia emissions limits prior to resuming annual source tests.

The District shall be notified of the date and time of the test at least 10 days prior to the test.

The test shall be conducted to demonstrate compliance with the Rule 1303 concentration limit.

The test shall be conducted to determine the NH3 emissions using District Method 207.1 or any other approved method measured over a 60-minute averaging time period. The NOx concentration, as determined by reading the CEMS, shall be simultaneously recorded during the test. If the CEMS is inoperable, a test shall be conducted to determine the NOx emissions using District Method 100.1 measured over a 60-minute averaging time period.

[RULE 1134, 4-5-2019; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 10-20-2000]

[Devices subject to this condition: C5, C12, C19, C26]

D29.1 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
CO emissions	District method 100.1	1 hour	Outlet of the SCR serving this equipment

Attachment C

Notices of Violation



South Coast Air Quality Management District 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 66098

Day (4)

Colton Power LP		182561	EJ.
LICENTON ADDRESS: LICENT ADDRE	colton	2	72324
944 S Stockton Ave.	Ripon	2	95366

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

DI	ESCRIPTION	OF VIOLATIO	ONS		
	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	SCAQMD CH&SC CCR	2004 (f)(i)		D82.1 D82.2	Failed to maintain a CEMS to measure NOx and CO concentrations for Device D8.
2	SCAQMD CH&SC CCR	3002		D82.1 D82.2	Failed to maintain a CEMS to measure NOx and CO concentration for Device D8.
3	SCAQMD CH&SC CCR	2012 (c)(2)(A)			Failed to maintain and operate a CEMS to monitor NDX for Device DB.
4	SCAQMD CH&SC CCR CFR	218 (6)(2)			Failed to maintain and operate a CEMS to monitor CO for Device Do.
5	SCAOMD CH&SC CCR	218.1 (6)X4)XO)			Failed to perform CEA on Device DI for quarter 2 of the 2022 CY.
Ser	Steve	Bruss	iel 2	 09-253-	647 Jessich Abbruzzese 6/22/23
R	legional	Compliance	Mgr. Sbrus	see@aen	y. US 310-233- JAbbruz-188@ agmd.gov



South Coast Air Quality Management District 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 78903

DAT	E OF VIOLA	TION
UL-ron	Day	Toda
0		100

Colton Power, LP		182561	EJ
661 S Cooley Dr	Colton	9	2324
14950 W Schulte Rd	Tracy	20	5377

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW, IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

VIOLATION ARE ISSUED.										
DESCRIPTION OF VIOLATIONS										
	Authority*	Code Section or Rule No	SCAQMD Permit to Operate or CAR8 Registration No.	Condition No (If Applicable)		Descri	ption of Violation			
1	SCAOMD CH&SC CCR CFR	2012 (c)(3)(A)	>		ma.	led to trans SS emissions ry codes by wing decy f	of NOxa 5:00 p	I daily and daily on the		
2	SCAOMD CH&SC CCR CFR	2012 App.A Chap2-E			Fail dail	y total eni		reporting		
3	SCAQMD CH&SC CCR CFR	2012 App. A A++.B				iled to app emission co evice DI.	oly BAF alculations	for for		
4	SCAQMO CHASC CCR CFR	2004 (e)(1)			Fa 1,2	iled to Su Bacers wi	th accura	e quarter to emissions		
5	SCAOMO CHASC CCR CFR	2004 (b)(4)			Fa	ort with nissions.	bout the	A PEP		
Sept	JT Shea 209-275.			7079	Comment (fly	bruzzese	12/8/2023			
E	Environmental Shear MRPG					☑ 909-396-3091 □ 310-233-	Email	USE@ aqmd.gov		
×e	*Key to Authority Abbreviations SCAOMD - South Coast Air Quality Management District CFR - Code of Frederice Regulations CFR - Code of Frederice Regulations Method of Service In Person Certified Mail									

SOUTH COAST AOMD CLERK OF THE BOARDS 2024 FEB 13 PM 12: 12

February 12, 2024

South Coast Air Quality Management District Attn: Clerk of the Board 21865 Copley Dr. Diamond Bar, Ca, 91765

Re: Regular Variance Petition - Colton Power, LP Century FID 182561

To Whom it May Concern:

Please find enclosed a Petition for Regular Variance for Colton Power, LP Century along with eight copies. Please note that the minute orders received on February 9th, 2024 for Variance Case No. 6167-4 included a typo in the facility ID, as highlighted in the Petition for Regular Variance. This petition will also be emailed to the Clerk of the Board.

If you have any questions regarding these re, please feel free to contact JT Shea at (209) 275-7079. Thank you for your time and consideration in this matter.

Respectfully,

JT Shea

San Joaquin Energy, Colton Power, LP Environmental Health and Safety Specialist