BEFORE THE HEARING BOARD OF THE

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of WALNUT CREEK ENERGY LLC [Facility ID No. 146536], Petitioner, v. SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. Respondent.	Case No. 6230-2 **DECLARATION OF GEORGE PIANTKA RE REGULAR VARIANCE PETITION; FILED IN SUPPORT OF CONSENT CALENDAR** Hearing Date: May 21, 2024 Time: 9:30 a.m. Place: South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765

I, George Piantka, declare:

1. I am the Senior Director for NRG Energy, which operates Walnut Creek Energy ("Facility"). If called as a witness, I could testify to the following based on personal knowledge.

2. I am familiar with and have reviewed the petition filed in Case no 6230-2, and I am familiar with the issues presented in the petition related to the start-up nitrogen oxides (NOx) mass emission requirements of the Facility's permit, including Permit Condition A195.7 on Facility Permit No. 146536 (Revision no. 9) (the revised "Title V Permit").

3. For the past 9 years I have served as the Senior Director of Regulatory Environmental Services at NRG Energy, which operates Walnut Creek Energy, a 500 MW natural gas-fired power plant powered by five (5) GE LMS100 simple cycle gas turbines. On January 31, 2024, the Facility was issued a Permit to Construct and Temporary Permit to Operate (PTC/TPTO) for an increase of the maximum heat input rate that will allow increased electrical generation to

California's power grid that would help address regional generation needs and improve system grid reliability.

4. The PTC/TPTO contained a new Permit Condition A195.7 that applies to Gas Turbine Units 1-5 (Devices D1, D7, D13, D19, D25). This condition includes, for the first time, a new NOx mass emission limit for start-up operations that takes effect 90 days after the completion of recommissioning for each unit following replacement of the selective catalytic reduction (SCR) catalyst. The new mass emission start-up limit for NOx, as stated in A195.7, does not represent a rule compliance requirement or Best Available Control Technology (BACT) standard. This limit was added to the Title V permit in the January 31, 2024 PTC/TPTO to enforce NOx emission estimates for start-up operations assumed by the South Coast AQMD engineering staff during initial facility permitting and used for emission calculation purposes.

5. The SCR catalysts for Units 1-5 were installed between February 18, 2024, and April 28, 2024. Following the start-up of the first unit, Unit 2, on February 27, 2024, after SCR installation, the Facility reviewed continuous emissions monitoring system (CEMS) data and determined that the NOx start-up mass emission limit identified in A195.7 could not be achieved. Following start-up of Unit 3, a similar review of CEMS data also determined that compliance with the new NOx startup limit could not be achieved. The Facility along with its consultant, Yorke Engineering, compared the new start-up limit to other similar electrical generating units permitted in the South Coast AQMD and found this limit to be lower and inconsistent with those permits. In consultation with South Coast AQMD permitting staff, it was agreed that an increase in the NOx start-up limit would be appropriate but that the change would have to be permitted through a separate permitting action from the PTC/TPTO that was issued on January 31, 2024.

6. Unit 2 will become subject to the new start-up mass emission limit for NOx on July 15, 2024, followed by Unit 3 on July 22, 2024, and then Units 1, 4, and 5 by September 5-25, 2024, respectively. The Facility plans to submit a permit application to modify the NOx start-up limit shown in Permit Condition A195.7 within 60 days of the variance hearing.

7. The team at the Facility, including myself, have worked diligently to determine the appropriate course of action in light of these facts.

8. Excess emission will be mitigated through compliance with existing natural gas throughput usage limits, and compliance with all other Title V mass emission limits. The Facility is subject to a permitted natural gas fuel usage limit of no more than 20.7 MM cubic feet per day per turbine. The Facility will comply with this limit throughout the variance period, and not exceed any existing permitted mass emission limit, other than the NOx start-up limit for which relief is requested. The daily natural gas usage limit developed during recent permitting actions to enforce potential to emit emissions under new source review based on operating 24 hours per day at maximum turbine load (i.e., 100% fuel heat input rate). By committing to operate below the daily natural gas fuel limit, the Facility will ensure that actual emissions will remain less than permitted levels for all pollutants, including NOx. Moreover, the Facility will monitor NOx emissions during the variance period using a certified continuous emission monitoring system (CEMS) for gas turbine Units 1-5.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this day of May 21, 2024 at City of Industry, California.

GEORGE PIANTKA