DOCKETED	
Docket Number:	03-AFC-01C
Project Title:	Roseville Energy Park Compliance
TN #:	265824
Document Title:	ANNUAL COMPLIANCE REPORT- 2024 - Part1
Description:	ANNUAL COMPLIANCE REPORT- 2024 - Part1
Filer:	Anwar Ali
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	8/29/2025 12:24:19 PM
Docketed Date:	8/29/2025



# **2024 Updated Annual Compliance Report**

As required by California Energy Commission: City of Roseville, Roseville Electric Utility-Roseville Energy Park COM-7 (03-AFC-1)

07/28/2025

Julie Manfredi Compliance Officer City of Roseville – Roseville Energy Park Phone: 916-774-5674

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	B) AS REQUIRED COMPLIANCE REPORTING

# I. COM-5 Compliance Matrix

# a) Annual Compliance Reporting

Technical Area	Condition Number	Verification Action	Date Required
Air Quality	AQ-42	NOx and VOC Emissions	June-August
Air Quality	AQ-68	Cooling Tower Lab Analysis	June-August
Air Quality	AQ-SC12	Off-Road Equipment	June-August
Biological Resources	BIO-2	Designated Biologist	June-August
Biological Resources	BIO-4	WEAP Training	June-August
General Compliance Condition	COM-5	Compliance Matrix	June-August
General Compliance Condition	COM-7	Annual Compliance Report Submittal	June-August
General Compliance Condition	COM-13	On-Site Contingency Plan Review	June-August
Hazardous Materials Management	HAZ-1	Hazardous Materials at the Facility	June-August
Soil and Water Resources	Soil & Water-2	Drainage, Erosion, Sedimentation Control Plan	June-August
Soil and Water Resources	Soil & Water-7	Water Use Summary	June-August
Soil and Water Resources	Soil & Water-8	Status Report on ZLD	June-August
Traffic and Transportation	TRANS-4	Permitting for Hazardous Material Transportation	June-August
Visual Resources	VIS-2	Cooling Tower Operation	June-August
Visual Resources	VIS-4	Surface Treatment Maintenance	June-August
Visual Resources	VIS-5	Landscape Screening	June-August
Waste Management	WASTE-5	Waste Management Plan	June-August

# b) As Required Compliance Reporting

Technical Area	Condition Number	Verification Action	Date Required		
Air Quality	AQ-22	NOx Emissions Records	As Requested		
Air Quality	AQ-30	Annual Source Test Protocol for NOx	30 days Prior		
Air Quality	AQ-30	Annual Source Test Results for NOx	Within 60 Days of Test		
Air Quality	AQ-31	Gas Turbine Operating Log	As Requested		
Air Quality	AQ-35	All Permit Records Maintained for 5 years	As Requested		
Air Quality	AQ-44	Annual Performance Test Protocol	30 Days Prior		
Air Quality	AQ-44	Annual Performance Test Results	Within 60 Days of Test		
Air Quality AQ-45		Cold Start NOx and CO Emissions Performance Test Protocol	Every 7 Years after Commissioning - Results within 60 Days of Test		
Air Quality AQ-45		Cold Start NOx and CO Emissions Performance Test Results	Every 7 Years after Commissioning - Protocol 30 Days Prior		
Air Quality	AQ-46	Annual Performance Test Methods Protocol	30 Days Prior		
Air Quality	AQ-46	Annual Performance Test Methods Results	Within 60 Days of Test		
Air Quality	AQ-49	Annual Particulate Matter Performance Test Protocol	30 Days Prior		
Air Quality	AQ-49	Annual Particulate Matter Performance Test Results	Within 60 Days of Test		
Air Quality	AQ-50	Annual SOx Performance Test Protocol	30 Days Prior		
Air Quality	AQ-50	Annual SOx Performance Test Results	Within 60 Days of Test		
Air Quality	AQ-51	NH3 Slip Exceedance	Within 10 Days of Exceedance		
Air Quality	AQ-51	Plan for Replacement or Reconditioning of Catalyst	30 Days Prior to Scheduled Date		
Air Quality	AQ-53	NOx Excursions	Within 5 Working Days of Occurrence		
Air Quality	AQ-66	No Hexavalent Chromium Compounds Added to Cooling Tower	Records Available as Requested		
Air Quality	AQ-110	Portable Equipment	Site Available for Inspection		

# c) Quarterly Compliance Reporting

Technical Area	Condition Number	Verification Action	Date Required
Air Quality	AQ-15	Operational Status of SCR and Oxidation Catalyst	April 30, July 30, October 30, January 30
Air Quality	AQ-20	Sulfur Content of Natural Gas	April 30, July 30, October 30, January 30
Air Quality	AQ-21	Start-ups and Shut-downs	April 30, July 30, October 30, January 30
Air Quality	AQ-32	Hourly, Daily, and Quarterly NOx and CO Emissions	April 30, July 30, October 30, January 30
Air Quality	AQ-33	Hourly, Daily, and Quarterly SOx Emissions	April 30, July 30, October 30, January 30
Air Quality	AQ-34	Invalid Data and CEMS Downtime	April 30, July 30, October 30, January 30
Air Quality	AQ-36	Upset Breakdown Reports	April 30, July 30, October 30, January 30
Air Quality	AQ-37	Notices of Non-Compliance	April 30, July 30, October 30, January 30
Air Quality	AQ-38	Upset Breakdown Corrections	April 30, July 30, October 30, January 30
Air Quality	AQ-39	CEMS Audits	April 30, July 30, October 30, January 30
Air Quality	AQ-40	CEMS QA Failures	April 30, July 30, October 30, January 30
Air Quality	AQ-41	Excess Emissions Reports	April 30, July 30, October 30, January 30
Air Quality	AQ-47	Emissions Nuisances	April 30, July 30, October 30, January 30
Air Quality	AQ-48	Opacity Violations	April 30, July 30, October 30, January 30
Air Quality	AQ-51	Hourly and 24-hour NH3 Slip Concentrations	April 30, July 30, October 30, January 30
Air Quality	AQ-55	Alstom GX100 NOx and CO Emissions During Start-ups and Shut-downs	April 30, July 30, October 30, January 30
Air Quality	AQ-57	Alstom GX100 LB/Hr Emissions Except During Start-ups and Shut-downs	April 30, July 30, October 30, January 30

Technical Area	Condition Number	Verification Action	Date Required
Air Quality	AQ-59	Alstom GX100 Daily Emission Limits	April 30, July 30, October 30, January 30
Air Quality	AQ-60	GTX100 Turbine Quarterly Emission Limits	April 30, July 30, October 30, January 30
Air Quality	AQ-63	Cooling Tower Annual Emission Limits	April 30, July 30, October 30, January 30
Air Quality	AQ-69	Cooling Tower Emissions Nuisances	April 30, July 30, October 30, January 30
Air Quality	AQ-70	Cooling Tower PM-10 Emission Exceedances	April 30, July 30, October 30, January 30
Air Quality	AQ-71	Cooling Tower PM-10 Emission Limit	April 30, July 30, October 30, January 30
Air Quality	AQ-86	Firewater Pump Emergency Generator Diesel Engine & Generator Testing Limits	April 30, July 30, October 30, January 30
Air Quality	AQ-87	Firewater Pump Limits for Operation and Maintenance Testing	April 30, July 30, October 30, January 30
Air Quality	AQ-88	Firewater Pump Sulfur Content of Diesel Fuel	April 30, July 30, October 30, January 30
Air Quality	AQ-89	Firewater Pump Operation and Maintenance Records	April 30, July 30, October 30, January 30
Air Quality	AQ-90	Firewater Pump Emissions Nuisances	April 30, July 30, October 30, January 30
Air Quality	AQ-91	Firewater Pump Opacity Violations	April 30, July 30, October 30, January 30
Air Quality	AQ-99	Emergency Generator Diesel Engine & Generator Testing Limits	April 30, July 30, October 30, January 30
Air Quality	AQ-100	Emergency Generator Operation Run Time Limits	April 30, July 30, October 30, January 30
Air Quality	AQ-101	Emergency Generator Sulfur Content of Diesel Fuel	April 30, July 30, October 30, January 30
Air Quality	AQ-102	Emergency Generator Operation and Maintenance Records	April 30, July 30, October 30, January 30
Air Quality	AQ-103	Emergency Generator Emissions Nuisances	April 30, July 30, October 30, January 30
Air Quality	AQ-104	Emergency Generator Opacity Violations	April 30, July 30, October 30, January 30
Air Quality	AQ-117	Excess Emissions During Upset, Breakdown, or Maintenance	April 30, July 30, October 30, January 30

### II. Project Operating Status

The Roseville Energy Park (REP) operated throughout most of the 2024 calendar year per the design basis.

#### III. Required Conditions

The required conditions are included in the Compliance Matrix within this Annual Report.

## IV. Post-Certificate Changes

REP did not submit a post-certification petition with the California Energy Commission (CEC) in 2024.

#### V. Submittal Deadline Resolutions

Pursuant to COM-7, REP will submit its annual report no later than July 30th. This date is 30+ days later than in past years but mutually agreed upon due to the State of California COVID-19 and possible staff shortages.

#### VI. New Filings

REP had no post certification filings submitted in calendar year 2024.

The PCAPCD Operating Permits (REPR-29-01, REPR-20-01, REPR-20-02, REPR-01-02, and REPR-01-01) for major equipment at REP were renewed through the annual process and are valid from October 1, 2024 – September 30, 2025. No changes were made to the permit conditions.

In total, three variances were issued during calendar year 2024.

- Short Term Variance 2024-02 was granted to identify the root cause of an unexpected mechanical vibration discovered after the 2021 hardware upgrade of combustion turbine generator #2. This Short-Term Variance was granted from March 27, 2024 through May 1, 2024.
  - Siemens prepared the unit for vibration tuning and testing and Generation staff at Roseville performed the following steps and completed the testing on April 2, 2024.
  - Generation staff conducted a series of controlled ramping and load-hold tests to support vibration tuning and data collection. To minimize NOx emissions during testing, the NOx setpoint was temporarily reduced, and emissions were closely managed throughout.
  - During testing, three high carbon monoxide (CO) exceedances occurred and were reported as Non-Compliance Event 2024-02.
  - The unit was returned to normal operations following the completion of testing and analysis.

- Emergency Variance 2024-03 was granted to investigate and identify the root cause of unexpected VOC and NOx exceedances during its annual source testing and RATA for CT2 and on July 9, 2024 and July 12, 2024. The unexpected exceedances did not meet EPA Performance Specification 2 to be within 20%.
  - Ouring the variance period, automatic calibrations were performed every eight hours and submitted to the PCAPCD daily. An internal investigation concluded that the likely contributors to the failed test results were minor drift in analyzer readings following gas bottle replacement and potential variability in portable lab equipment used during testing.
  - Although no emission exceedances occurred during the variance period, a separate Non-Compliance Event 2024-018 was reported due to an unrelated loss of ammonia control caused by a fiber optic signal failure. This issue was resolved through the installation of an alternate cable route.
  - Re-testing was completed successfully between July 23 and July 24, 2024 after manual calibrations were applied, and the updated test results were submitted to the PCAPCD on August 28, 2024.
- Emergency Variance 2024-07 was granted Emergency Variance #2024-07 investigate and identify the root cause of unexpected electrical generator trip on Combustion Turbine 2 (CT2).
  - On November 16, 2024, the REP was taken offline by its facility operators out of an abundance of caution and remained offline through March of 2025.
  - In coordination with generation staff and after extensive investigation and troubleshooting by Siemens the cause of CT2's electrical trip has been identified as failed gas turbine components.
  - Parts and materials were specifically identified when the engine was disassembled, and repair activities were completed.

#### VII. Projected Compliance Activities

The REP has planned and budgeted the following repetitive compliance activities:

- Maintain compliant operations of the facility through the purchase and use of required consumables
- Planning of prudent preventative maintenance tasks
- Compliance training of site personnel
- Conduct and complete required annual testing i.e., RATA and Source Testing
- Evaluate critical spares in stock and update lists based on industry best management practices
- Timely compliance report submittals

### VIII. Compliance File Additions

Visual Condition of Certification (VIS-5) has been added to this Annual Report as the Blue Oaks / Phillip Road extensions have been completed, however landscaping south of Blue Oaks is not complete.

This project will continue to be evaluated over the next fiscal year. Simultaneously, or when we submit the landscaping plan to the City of Roseville Planning Department, we will also submit to the Compliance Project Manager (CPM) for review and approval. Commencement of the landscape installation will begin after the CPM approves the plan.

Soil & Water – 2 has been added as an amendment to the CY2022 and CY2023 Annual Reports and added to future year reports beginning with the CY2024 report which will be completed in 2025.

## IX. Contingency Plan Evaluation

After reviewing the On-Site Contingency Plan, it has been determined that the measures outlined in the plan are sufficient for an unplanned facility closure. At this time, the state of the facility has not changed since the CEC's initial review of the plan.

## X. Complaint, NOV, Official Warnings, and Citations List with Resolutions

Roseville Energy Park did not receive any complaints, official warnings or citations for calendar year 2024.

Roseville Energy Park received 2 NOVs for non-compliance events during calendar year 2024.

- **NOV 6048** was issued due to a carbon monoxide (CO) emission exceedance during the startup of Combustion Turbine 2 (CT2), which was initiated in response to an urgent shutdown of CT1 following an ammonia valve failure on June 14, 2024.
  - Cause: CO emissions during startup exceeded the permitted limit of 89.5 lbs./hr. as specified in Permit to Operate REPR-20-02, Condition #51. The exceedance was attributed to a delayed ramp-up to Pmin after generator synchronization and was reported as Non-Compliance Event 24-013.
  - Correction: During the next startup, Power Plant Operators ensured sufficient time for generator breaker synchronization and proper ramp-up to Pmin to prevent recurrence.

• NOV 5951 and 5952 were issued due to a volatile organic compounds (VOC) emissions exceedances during RATA testing on May 22, 2024 and May 30, 2024. Both NOVs were issued under a single action for the same issue affecting CT2 (REP) and CT6 (RPEAK), with no delineation as to which NOV applied to which unit. Therefore, both NOV numbers are listed above.

#### Cause:

- During annual source testing and RATA conducted on May 22, VOC emissions from CT2 were measured at 2.1 ppmvd @ 15% O₂, exceeding the permitted limit of 2.0 ppmvd (1-hour average) as outlined in Permit to Operate REPR-20-02, Condition #49.
- Additionally, the NOx monitor on CT2 failed the RATA, with a relative accuracy of 23.2% ppm @ 15% O<sub>2</sub> and 20.4% for lb/hr. This did not meet the 40 CFR Part 60, Appendix B Performance Specification limit of 20% of the reference mean, as required by Permit REPR-20-02, Condition #15.
- The NOx RATA failure was attributed to minor variations in calibration gas bottle concentrations, which led to analyzer drift. VOC test failures were attributed to contamination.

#### Correction:

- Emergency Variance 24-03 was requested and granted by the PCAPCD Hearing Board on July 12, 2025, allowing continued operation during troubleshooting and repair.
- The facility replaced calibration gases, performed manual calibrations, and addressed the analyzer drift.
- Retesting was performed on July 23 and July 24, 2024, with results demonstrating compliance with both VOC permit limits and NOx monitor RATA requirements, as documented in test reports dated August 28, 2024.

## XI. Appendix: Specific Conditions Operating Data

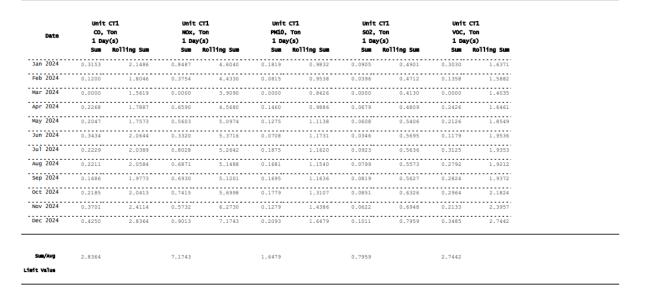
### i) AQ-42 - Combustion Turbine #1

#### Tons 12 Month Rolling Summary

CT1

From: 01/01/2024 00:00 To: 12/31/2024 23:59 Facility Name: ROSEVILLE ENERGY Generated: 06/19/2025 12:36 Location: Roseville, CA

\* = Excess Emission



CT1\_Tons\_12MonthRollingSummary

# ii) AQ-42 - Combustion Turbine #2

## Tons 12 Month Rolling Summary

CT2

 From:
 01/01/2024 00:00
 To:
 12/31/2024 23:59
 Facility Name:
 ROSEVILLE ENERGY LOCATION:

 Generated:
 06/19/2025 12:37
 Location:
 Roseville, CA

\* = Excess Emission



Date	Unit CT2 CO, Ton 1 Day(s) Sum Rollin		Unit CT2 NOX, Ton 1 Day(s) Sum Rolling S	PM10 1 Da	c CT2 , Ton uy(s) Rolling Sum	Unit ( SO2, 1 1 Day( Sum	ron	Unit C VOC, T 1 Day( Sum	on
Jan 2024	0.3059 2	.3823 0.7	360 4.03	40 0.1569	0.8334	0.0772	0.4105	0.2615	1.3900
Feb 2024	0.0494 1	.9792 0.0	281 3.54	44 0.0044	0.7346	0.0023	0.3596	0.0073	1.2251
Mar 2024	0.0071 1	.2791 0.0	054 3.06	35 0.0018	0.6528	0.0009	0.3189	0.0030	1.0890
Apr 2024	0.1880 1	.4671 0.0	383 3.10	18 0.0042	0.6570	0.0020	0.3209	0.0070	1.0960
May 2024	0.1524 1	.6195 0.3	268 3.42	86 0.0677	0.7247	0.0318	0.3527	0.1127	1.2087
Jun 2024	0.2889 1	.9084 0.7	329 4.16	15 0.1559	0.8806	0.0725	0.4252	0.2599	1.4686
Jul 2024	0.2313 1	.8712 0.8	666 4.47	17 0.1864	0.9479	0.0890	0.4544	0.3102	1.5803
Aug 2024	0.2995 1	.9018 0.6	915 4.30	46 0.1785	0.9414	0.0817	0.4458	0.2978	1.5690
Sep 2024	0.2726 1	.9597 0.8	389 4.59	58 0.1830	1.0074	0.0859	0.4758	0.3047	1.6784
Oct 2024	0.2326 2	.0616 0.5	982 4.89	12 0.1289	1.0724	0.0610	0.5066	0.2147	1.7866
Nov 2024	0.1571 2	.1848 0.2	090 5.07	17 0.0409	1.1086	0.0192	0.5235	0.0680	1.8468
Dec 2024	0.0000 2	.1848 0.0	000 5.07	17 0.0000	1.1086	0.0000	0.5235	0.0000	1.8468
Sum/Avg	2.1848	5.0	717	1.1086		0.5235		1.8468	
Limit Value									

CT2\_Tons\_12MonthRollingSummary

## iii) AQ-68 - Analytical Report



10041 Lickinghole Road - Ashland, Virginia 23005 + t/804.935.2418 + www.chemtreat.com

**Analytical Lab** 

# **Certificate of Analysis**

Apr 22, 2024

Laboratory No. W-240416-036

Company CITY OF ROSEVILLE (C007748)
Address 5120 PHILLIP RD, 95747-9116,

Account Manager Karl Wolff
Request Date Apr 16, 2024
Sample Class Water

Analysis	RECYCLED WATER	COOLING TOWER
Analysis	Apr 11, 2024	Apr 11, 2024
Lab pH	7.04	6.86
Conductivity	471 umho	2745 umho
P-Alkalinity, as CaCO3	<1 mg/L	<1 mg/L
M-Alkalinity, as CaCO3	62 mg/L	33 mg/L
Calcium Hardness, as CaCO3	35 mg/L	154 mg/L
Magnesium Hardness, as CaCO3	20 mg/L	74 mg/L
Iron, as Fe	0.04 mg/L	0.04 mg/L
Copper, as Cu	<0.01 mg/L	<0.01 mg/L
Zinc, as Zn	0.04 mg/L	0.04 mg/L
Sodium, as Na	79 mg/L	561 mg/L
Potassium, as K	15 mg/L	61 mg/L
Chloride, as Cl	70 mg/L	558 mg/L
Sulfate, as SO4	27 mg/L	425 mg/L
Nitrate, as NO3	43 mg/L	209 mg/L
Ortho-Phosphate, as PO4	11 mg/L	26 mg/L
Silica, as SiO2	16 mg/L	65 mg/L
Total Phosphate, as PO4	12 mg/L	30 mg/L
Filtered Phosphate, as PO4	-	30 mg/L
Fluoride, as F	0.80 mg/L	4.2 mg/L
Bromide, as Br	-	17 mg/L

Comments

Respectfully Submitted,

Joel Phillips

Director, Analytical Lab ChemTreat International, Inc.

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**Analytical Lab** 

## **Certificate of Analysis**

Apr 22, 2024

Laboratory No. W-240416-036

Company CITY OF ROSEVILLE (C007748) Address 5120 PHILLIP RD, 95747-9116,

Account Manager Karl Wolff
Request Date Apr 16, 2024
Sample Class Water

Analysis	RECYCLED WATER	COOLING TOWER
Allalysis	Apr 11, 2024	Apr 11, 2024
Polymer, PAA	-	6.0 mg/L
Filtered Polymer	-	5.0 mg/L
Ammonia, as NH3	1.0 mg/L	0.16 mg/L
Aluminum, as Al	<0.01 mg/L	0.15 mg/L
Barium, as Ba	<0.01 mg/L	0.02 mg/L
Manganese, as Mn	<0.01 mg/L	0.35 mg/L
Molybdenum, as Mo	-	<0.05 mg/L
Strontium, as Sr	0.08 mg/L	0.36 mg/L
тос	-	9.0 mg/L
Turbidity, as NTU	203 ntu	2.5 ntu

Comments

Respectfully Submitted,

Joel Phillips

Director, Analytical Lab ChemTreat International, Inc.

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## iv) AQ-SC12 - Off road equipment handling or loading equipment

REP currently does not own or utilize any off-road material loading or handling equipment.

#### v) BIO-2 – Designated Biologist Duties

#### Kelly Fitzgerald-Holland, CWB®

Senior Wildlife Biologist and Regulatory Specialist

Kelly Fitzgerald-Holland is a senior wildlife biologist and environmental compliance expert. She leads GEI's Biological Resources Team, overseeing field surveys and construction compliance monitoring. She is a Certified Wildlife Biologist<sup>®</sup>, who has over 27 years of experience in ecological research, program management, environmental regulation and compliance, and conservatin planning. She has served as senior wildlife biologist and task lead manager for a large number of projects that require endangered species permitting and biological analysis for California Environmental Quality Act (CEQA)/National Environmental Policy act (NEPA) compliance. Ms. Holland specializes in evaluating impacts on threatened and endangered wildlife species and their habitats and coordinating with agency staff to ensure compliance with the Federal and State Endangered Species Acts (ESA and CESA, respectively). Ms. Holland is a recognized expert in ESA consultations and impact analysis, and has lead a number of workshops and trainings on ESA and CESA.

#### PROJECT EXPERIENCE

On-Call Biological Services for City of Roseville, IEC Corporation, Roseville, CA. Project manager and senior wildlife biologist who provided on-call biological services to assist the City of Roseville with compliance at the City's Electric Energy Park facility. Served as the Designated Biologist approved by the California Energy Commission (CEC). Assisted with biological resource consultations to evaluate compliance with permits, and prepare annual statements, as defined in the CEC Conditions of Certification.

Reclamation District 17 Levee Seepage Area Repair Project, Reclamation District 17, San Joaquin County, CA. Project manager for this \$1.5 million project that would construct needed repairs to the eastside of the San Joaquin River levee to enable the levee system to withstand 100-year flood conditions and receive Federal Emergency Management Agency certification. GEI provided comprehensive environmental services, including NEPA/CEQA documentation, environmental permitting, habitat mitigation design, and construction compliance monitoring. Served as the principal biologist and regulatory specialist who prepared a biological assessment that evaluated project plans, and coordinated with the regulatory agencies (U.S. Fish and Wildife Service (USFWS) and the National Marine Fisheries Service) during ESA Section 7 consultation. Led the development of the permitting and mitigation strategy, which included the mitigation and monitoring plan to offset project impacts on the riparian brush rabbit. Oversaw implementation of compliance monitoring and mitigation.

Tisdale Weir Rehabilitation and Fish Passage Project, U.S. Army Corps of Engineers and California Department of Water Resources (DWR), Sutter County, CA. Project manager for this \$310,000 effort that provided various environmental services support for this project. Tisdale Weir is a critical, State-owned component of the State Plan of Flood Control. The project would construct needed structural repairs to Tisdale Weir and modify the weir to add new on-



#### **EDUCATION**

M.S., Environmental Science, Washington State University, Pullman B.A., Environmental Studies, University of

California, Santa Cruz

EXPERIENCE IN THE INDUSTRY 27 years

EXPERIENCE WITH GEI

8 years

**CERTIFICATIONS** 

Certified Wildlife Biologist, The Wildlife Society (TWS) (since 2014) Wilderness First Aid (exp. 12/3/2026) PROFESSIONAL ASSOCIATIONS

TWS Certification Review Board (2022 -

Conservation Affairs Committee Chair, Western Section of TWS (2016 - 2024) Past-President, Western Section of TWS (Pres.-Elect, 2019; President, 2020) Board Member, Western Section TWS (2016 - 2024)

The Wildlife Society (since 2008)

PRESENTATIONS & TRAININGS CEQA: Biological Resources Analysis for Water Projects Workshop (Two-part Series). Association of Women in Water, Energy, and Environment. 2024.

Federal Policy Engagement with Local Impacts: Supporting Science-Based Decision-Making From a Section Perspective. TWS, 2023 Annual Conference, Louisville, KY, Nov. 2023

Major Environmental Regulations 4-Hour Workshop. Western Section of TWS Annual Meeting, Reno, NV. Feb. 2022.

CEQA for Biologists 4-Hour Training. \*AEP, Sacramento, CA. July 2021. \*TWS, Arcata, CA, December 2019 \*TWS/AFS, Reno, NV. September 2019. \*AEP, Sacramento, CA. January 2018.

Wetlands and Endangered Species Act 8-Hour Training. Beale Air Force, Yuba County, California. May 2014.

Endangered Species Act Section 7 Consultation and Incidental Take Permit Applications - Overview. Sacramento, California. October 2014.



site fish passage facilities (notch/channel/baffles/fish collection basin) to allow passage from behind the weir to the river to decrease the incidence of stranding. GEI revised the biological assessment to include additional analysis on the project's impacts on designated critical habitat and federally listed fish species, prepared a fish rescue plan to support project permit conditions, and conducted an anslysis of compensatory mitigation strategies and approaches. In addition, GEI provided technical assistance on other project permit applications, including the Clean Water Act Sections 401 and 404 permits and the California Fish and Game Code Section 1600 permit, and on the vegetation management plan, a long-term management plan, and an adaptative management plan.

Right-of-Way Reinforcement Program, El Dorado Irrigation District (EID), El Dorado County, CA. Project manager for implementing biological surveys and constraints evaluation along 32 miles of pipeline cornidor where vegetation management treatments would be implemented. Senior wildlife biologist who led the preparation of the biological resource analysis for the Initial Study/Mitigation Negative Declaration. This program would treat vegetation within the 60-foot-wide utility cornidor along the EID's approximately 88-mile transmission line system to allow for EID staff to access and maintain the water conveyance system. Conducted the biological resources impact analysis, developed mitigation measures, and provided cost analysis for mitigation.

Sly Park Day Use Area Shoreline Stabilization Project, EID, El Dorado County, CA. Assistant project manager for preconstruction survey in aquatic habitat for special-status species, notably California red-legged frog. Supported client coordination and task management for deliverables, including a technical memo of survey activities and results and daily monitoring reports.

Marysville Ring 2B Project, Odin Construction, Marysville, CA. Project manager for providing biological services to avoid and minimize impacts to special-status species (e.g., giant garter snake [GGS], Swainson's hawk, and valley elderberry longhorn beetle) and habitats during levee construction. Biological services included: developing and delivering worker environmental awareness program (WEAP) trainings; surveying for and mapping elderberry shrubs; conducting biological construction monitoring; and enforcing permit compliance during construction. The project's purpose is to reduce overall flood risk to the city of Marysville by reinforcing a portion of the levee adjacent to the Yuba River.

American River Watershed Common Features (ARCF), Natomas Basin – Reach D / Highway 99 Window Project, Odin Construction, Sutter County, CA. Project manager for providing construction compliance monitoring for biological and cultural resources. Services included: developing and delivering WEAP trainings; conducting preconstruction nesting bird surveys; and conducting biological and cultural resources construction monitoring; and enforcing permit compliance during construction. The project consists of the construction of 744 feet of cut off wall to complete the window (gap) in the existing Natomas levee cut off wall located in Reach D. The window resides both through and on either side of California State Route 99.

Yolo Bypass East Levee (North Area) Project, Odin Construction, West Sacramento (Yolo County), CA. Project manager for providing construction compliance monitoring for biological and cultural resources. Services included: developing and delivering WEAP trainings; conducting preconstruction nesting bird surveys; and conducting biological and cultural resources construction monitoring; and enforcing permit compliance during construction. The work includes proposed improvements and repairs to the Yolo Bypass East Levee. A segment of the levee will be repaired to restore landside levee embankments, improve landside toe drainage, and mitigate seepage through construction of a subdrain system and pumping station.

Sutter Bypass Pumping Plant Rehabilitation Project, DWR, Sutter County, CA. Project manager for providing biological services to avoid and minimize impacts to the threatened GGS during the rehabilitation of three pumping plants along the Sutter Bypass. Biological services included conducting preconstruction surveys and biological monitoring during construction, and preparing and delivering WEAP training.

Sutter Collecting Canals Aquatic Vegetation and Sediment Removal Project, DWR, Sutter County, CA. Project manager for providing biological services to avoid and minimize impacts to the threatened GGS during removal of aquatic vegetation along the Sutter Bypass and removal of sediment along the Sutter Collecting Canals. Biological services included conducting preconstruction surveys and biological monitoring during aquatic vegetation and sediment removal, as well as implementing a scent-detection dog survey of the canals. The scent-detection dog survey was conducted by a subconsultant along sections of the Sutter Collecting Canals and around



three associated pumping stations at the request of DWR, as a supplement to the preconstruction surveys. The survey was conducted with a fully trained GGS scent-detection dog and survey methodology followed previously developed protocols for detection of GGS. The objective of the survey was to further explore the potential benefits of enhanced survey techniques (e.g., scent-detection dogs) along collecting canals to help identify potential GGS locations to further DWR's commitment to environmental sustainability. Developed a study design to test rodent abatement methodology, and specifically examining the effectiveness of various traps to manage rodent populations on levee systems.

Calaveras Cement CKD 3 Closure Project, Lehigh Hanson, County of Calaveras, CA. Project manager for this \$40,000 effort of providing biological surveys and compliance monitoring for the project. The project involved the cleanup and closure of areas pertaining to the Lehigh Southwest Cement Company. Environmental services included developing and delivering a WEAP training program, and conducting biological construction monitoring for nesting birds and special-status species: California red-legged frog, foothill yellow-legged frog, and western pond turtle.

John Smith Road Landfill Expansion Project, Waste Connections, Hollister, CA. Project manager for this effort that provided environmental compliance strategies for this landfill expansion project, with over \$250,000 in tasks that include special-status species surveys and habitat evaluations, a wetland delineation, preconstruction surveys, WEAP trainings, and development of an habitat conservation plan (HCP). The existing 65-acre landfill site, located in Hollister, California, would be expanded by nearly 390 acres. Developed a Species Impact Avoidance Strategy for the site. Prepared the biological resources CEQA section that evaluated impacts related to the landfill expansion. Oversaw the preparation of a visual simulation analysis, and the CEA sections for cultural resources and aesthetics. Prepared HCP (ESA Section 10) and CESA 2081(b) incidental take permit application.

Calaveras Cement CKD 3 Closure Project, Lehigh Hanson, County of Calaveras, CA. Project manager for this \$40,000 effort of providing biological surveys and compliance monitoring for the project. The project involved the cleanup and closure of areas pertaining to the Lehigh Southwest Cement Company. Environmental services included developing a WEAP training, and conducting biological construction monitoring for nesting birds and special-status species: California red-legged frog, foothill yellow-legged frog, and western pond turtle.

Ranch 35 Quarry Project, Mitchell Chadwick, LLP, San Benito County, CA. Project manager for this \$127,000 effort of providing biological surveys and habitat evaluation for the project site. GEI biologists conducted a comprehensive survey of the 126-acre project site to characterize habitats and identify the potential for special-status species occurrence in order to identify environmental constraints to site development. The environmental report provided recommendations to avoid and minimize impacts to biological resources identified on the site. In addition, GEI biologists conducted a wetland assessment and a rare plant survey of the site.

Hidden Canyon Quarry Project, Mitchell Chadwick, LLP, Monterey County, CA. Project manager for this \$31,500 effort of providing biological surveys and habitat evaluation for the project site. GEI biologists conducted a comprehensive survey of three areas surrounding an 184-acre existing quarry. These three areas, totaling approximately 200 acres, are being considered for expansion of quarry operations. GEI biologists surveyed these areas to characterize habitats and identify the potential for special-status species occurrence in order to identify environmental constraints to site development. The environmental report provided recommendations to avoid and minimize impacts to biological resources identified on the site.

ARCF 2016, Folsom Dam Raise, and Marysville Ring Levee Projects, DWR, Sacramento and Marysville, CA. Senior wildlife biologist who coordinated environmental surveys – specifically focused on nesting birds, including Swainson's hawk – to support construction of the Lower American River (LAR) Contract 1, LAR Contract 2, and Sacramento Erosion River Contract 1/ River Mile 55.2 Left Bank Protection, among other components of the ARCF 2016 Project, Marysville Ring Levee Phase 3 project, and Folsom Dam Raise project. Oversaw updates to habitat mapping and rare plant surveys for project sites.

Morrison Creek/Beach Lake Levee Project, Sacramento Area Flood Control Agency, Sacramento County, CA. Senior wildlife biologist who oversaw biological surveys and habitat evaluation for the project site. GEI biologists conducted a comprehensive survey of the project site to characterize habitats and identify the potential for special-status species occurrence in order to identify environmental constraints to site development. The environmental report provided recommendations to avoid and minimize impacts to biological resources identified on the site. Led the development of a biological assessment to support ESA consultation with USFWS.



#### vi) BIO-4 – Worker Environmental Awareness Program

Worker Environmental Awareness Program (WEAP) Training is provided to employees of REP and contractors in the form of a video and by review of the program documentation. Training is acknowledged through a signature page. These records are retained at REP for at least 12 months following the termination of an individual's employment.

#### vii) COM-13 – Unplanned Temporary Closure/On-Site Contingency Plan

After reviewing the On-Site Contingency Plan, it has been determined that the measures outlined in the plan are sufficient for an unplanned facility closure. At this time, the state of the facility has not changed since the CEC's initial review of the plan.

#### viii) HAZ-1 - Hazardous Materials Contained On-Site

There were no changes to the Hazardous Materials and Wastes Inventory Matrix Report between 2023 and 2024.

CERS Business/Org.	City of Ros	eville, Roseville Electric		Chemical Location						10207330		
acility Name		nergy Park		Aqueous Ammonia Storage Area					CERSID 10207330 Facility ID			
	5120 Phillip F	td, Roseville 95747							Status Submitted on 9/14/2023 5:			
					Quantities		Annual Waste			Hazardous Component (For mixture only)		
DOT Code/Fire Haz.	Class	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.	
OOT: 8 - Corrosive: Solids)	s (Liquids and	Ammonium Hydroxide	Gallons	9000	10000	5000			Ammonia	28%		
3)		CAS No 1336-21-6	Liquid A	Storage Container Aboveground Tank Days on Site: 365		Pressue Temperature	Waste Cod	e	Water	72%		

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			Hazardo	us Materials	And Waste	s Inventory	Matrix	Report			
ERS Business/Org. acility Name		seville, Roseville Electric Energy Park	Chemical Location Closed Cooling Water System						CERSID 10207330 Facility ID		
5120 Phillip Rd,		Rd, Roseville 95747								Submitted on 9/1	4/2023 5:18 PM
					Quantities		Annual Waste	Federal Hazard		Hazardous Componen (For mixture only)	ts
DOT Code/Fire Haz. C	lass	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
DOT: 3 - Flammable Combustible Liquid		AntiFreeze	Gallons State	800 Storage Container	400	300 Pressue					
		57-55-6	Liquid Type	Other	_	Ambient Temperature	Waste Cod	e			
				Days on Site: 365		Ambient					

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			Hazardo	us Materials	And Waste	s Inventor	y Matrix	Report			
CERS Business/Org.	City of R	oseville, Roseville Electric			Chemical Loca	CERSID	10207330				
Facility Name	Roseville	Energy Park	Combustion Turbine Generator #3 & hydraulic starting Fadility ID								
	5120 Phillip	Rd, Roseville 95747	system						Status Submitted on 9/14/2023 5:18 PM		
			Quantiti			Annual Waste		Hazardous Components (For mixture only)			
DOT Code/Fire Haz. C	lass	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	y Amount	Categories	Component Name	% Wt	EHS CAS No.
		Mobile Jet Oil	t Oil Gallon	81	81	81		- Physical			
Combustible Liquid	, Class II	CAS No.	State Liquid	Storage Container Other	-	Pressue	Waste Code	Flammable			
			Type Pure			Temperature	-				

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			Hazardo	us Materials /	And Waste	s Inventor	y Matrix	Report			
CERS Business/Org.		oseville, Roseville Electric			Chemical Loca			2 2 W	CERSID	10207330	
acility Name		e Energy Park p Rd, Roseville 95747			Combusti system	on Turbine	Generato	r#4 & hydrau	lic starting Fedlity Status	Submitted on 9/3	14/2023 5:18 PM
04045550 a 55050 a 400 a 4	20		45945		Quantities		Annual Waste	Federal Hazard	2	Hazardous Componen (For mixture only)	ts
DOT Code/Fire Haz. (	Class	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CAS No.
	66 Mar 64 Star 1 of 100 S	Mobile Jet Oil	Gallons	81 Storage Container		81 Pressue	Waste Code	- Physical Flammable			
Combustible Liquic	d, Class II	CAS No	Liquid Type Pure	Other		Temperature					

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CERS Business/Org.	City of Roseville, Roseville Electric			Chemical Loca	ation			CERS ID 10207	330	
acility Name	Roseville Energy Park			Cooling T	ower			Facility ID		
	5120 Phillip Rd, Roseville 95747							Status Submitt	ed on 9/1	4/2023 5:18 PM
				Quantities		Annual Waste	Federal Hazard	Hazardous (For mix		ts
OOT Code/Fire Haz. C	lass Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
	Dispersant - Cooling water treatment	Gallons State	300 Storage Container	275	300 Pressue			Phosphonobutane Tricarboxylic Acid	10%	37971-36-3
	CAS No	Liquid /	Aboveground Tank		Ambient Temperature Ambient	Waste Cod	le_	Acrylic copolymer	10%	MIXTURE

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ERS Business/Org.		eville, Roseville Electric			Chemical Loca					10207330	
acility Name		nergy Park d. Roseville 95747			Cooling 1	ower Chemi	cal Encio	sure	Facility ID		
	5120 Phillip K	a, Roseville 95/4/			Quantities		Annual Waste	Federal Hazard	На	Submitted on 9/14 ardous Components (For mixture only)	
OT Code/Fire Haz. C	lass	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
		Corrosion Inhibitor	Gallons	800	400	400					
		CAS No 64665-57-2	State Liquid	Storage Container Aboveground Tank		Pressue Ambient	Waste Code	1			
		disciplinate disciplinate	Type Mixture	Days on Site: 365		Temperature Ambient					
		Corrosion Inhibitor	Gallons	55	55	55			Sodium Hydroxide		1310-73-2
		CAS No	State	Storage Container		Pressue	Waste Code		Sodium Molybdate		7631-95-0
		8780	Liquid	Other		Ambient			Sodium Totylnazole		64665-57-
			Type Mixture	Days on Site: 365		Temperature Ambient			Sodium Metaborate Sodium Nitrite		7775-19-1 7631-99-4
		Sodium Hypochlorite >5% - 12	.5% Gallons	8000	8000	5000			SODIUM HYPOCHLORITI		7681-52-9
		CAS No	State	Storage Container		Pressue	Waste Code		WATER	88%	7732-18-5
		7681-52-9	Liquid	Aboveground Tank		Ambient					
		, , , , , , , , , , , , , , , , , , , ,	Туре			Temperature					
			Mixture	Days on Site: 365		Ambient					
OT: 8 - Corrosives	(Liquids and	Sulfuric Acid	Gallons	6000	6000	4000			Sulfuric Acid	93%	7664-93-9
olids)		CAS No	State	Storage Container		Pressue					
		7664-93-9	Liquid	Aboveground Tank		Ambient	Waste Code	<u>.</u>	Water	7%	
Oxidizing, Class 1			Туре			Temperature					
			Mixture			Ambient					

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RS Business/Org.	City of Roseville, Roseville Electric			Chemical Loca				CERSID 10207	220	
						I Building			330	
cility Name	Roseville Energy Park			Electrical	/Mechanica	Building		Facility ID		
	5120 Phillip Rd, Roseville 95747							7.7-10.0-1		4/2023 5:18 PM
				Quantities		Annual Waste	Federal Hazard	Hazardous (For mix	Component ture only)	s
T Code/Fire Haz.	Class Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
	CCCW Molybdate Treatment	Gallons	55	55	55		- Physical	Sodium hydroxide		√ 1310-73-2
	Drewgard		Storage Container	_	Pressue	Waste Code	Corrosive To	MOLYBDENUM COMPOUND		✓ Trade Secre
	CAS No.	Liquid	Plastic/Non-metal	ic Drum	Ambient		Metal - Physical Hazard			
	315	Туре			Temperature		Not Otherwise			
		Pure			Ambient		Classified			
							- Health Skin			
							Corrosion			
							Irritation - Health Serious			
							Eye Damage Eye			
							Irritation			
	Corrosion Inhibitor	Gallons	400	400	280			Cyclohexylamine	5%	108-91-8
	CAS No	State	Storage Container	_	Pressue	Waste Code	_	Monoethanolamine	20%	141-43-5
	50 10 11 0 10 10 10 10 10 10 10 10 10 10 10 10 10 1	Liquid	Aboveground Tan	k				Methoxypropylamine	20%	5332-73-0
		Туре			Temperature					
	Natural Control	Mixture	400	400	200			Carbohydrazid		497-18-7
	Nalco Elimin-Ox Oxygen	Gallons	400 Storage Container	400	280 Pressue	Waste Code		Carbonyarazia		437-10-7
	Scavenger		Aboveground Tan	_ k	Ambient	waste code	-			
	CAS No	Туре	indevegreenia run		Temperature					
			Days on Site: 365		Ambient	-				
	Trisodium phosphate	Gallons	400	400	300			Trisodium Phosphate		7601-54-9
			Storage Container		Pressue	Waste Code		Sodium Hydroxide	5%	1310-73-2
	7601-54-9		Aboveground Tan	k			-			
	7001-34-9	Туре			Temperature					
		Mixture	Days on Site: 365		300000000000000000000000000000000000000	8				

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CERS Business/Org. Facility Name	City of Roseville, Roseville Electric Roseville Energy Park 5120 Phillip Rd, Roseville 95747			Chemical Loca HRSG Are				Facility ID	207330	4/2023 5:18 PM
	SZZ Filmip III., NOSCIIIC SS. 17			Quantities		Annual Waste	Federal Hazard	Hazar	dous Component or mixture only)	
DOT Code/Fire Haz. C	lass Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
	Calibration Gases	Cu. Feet	20000	250	7500			Nitric Oxide	1%	10102-43-9
		State St	torage Container		Pressue	Waste Code		Carbon Monoxide	1%	630-08-0
	CAS No		ylinder	-	> Ambient			Oxygen	21%	7782-44-7
		Type Mixture	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		Temperature Ambient			Carbon Dioxide Nitrogen	20%	124-38-9 7727-37-9
OOT: 3 - Flammable	and Diesel Fuel No. 2	Gallons	1500	1500	1500					-33
Combustible Liquid	S CAS No	State St	torage Container		Pressue					
	68476-34-6		boveground Tan	k	Ambient	Waste Cod	2			
	00470-34-0	Туре			Temperature					
			ays on Site: 365		Ambient					

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		Hazardou	s Materials	And Waste	s Inventor	y Matrix I	Report			
ERS Business/Org.	City of Roseville, Roseville Electric			Chemical Loca	etion			CERSID	10207330	
Facility Name	Roseville Energy Park			Plant				Facility	D	
	5120 Phillip Rd, Roseville 95747							Status	Submitted on 9/1	4/2023 5:18 PM
				Quantities		Annual Waste	Federal Hazard		Hazardous Componen (For mixture only)	ts
DOT Code/Fire Haz.	Class Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
	Nitrogen Gas	Cu. Feet	53 orage Container	53	35.31 Pressue	Waste Code	- Physical Gas Under Pressure			
	CAS No	Gas O	ther ays on Site: 365	-	Temperature					

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CERS Business/Org.	City of Roseville, Roseville Electric			Chemical Loca	ation			CERSID 1	0207330	
acility Name	Roseville Energy Park			Power Pla	ant			Fadility ID		
	5120 Phillip Rd, Roseville 95747							Status <b>S</b> u	bmitted on 9/14	/2023 5:18 PM
				Quantities		Annual Waste	Federal Hazard		rdous Components or mixture only)	
OOT Code/Fire Haz. 0	Class Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
	Fuel Gas Drains	Gallons	350	250	150	95		Natural Gas Condensate		68919-39-1
	CAS No	State	Storage Container		Pressue	Waste Code		Benzene	2%	71-43-2
	68919-39-1	Liquid	Aboveground Tank	·		213				
		Type Waste	Days on Site: 365		Temperature					
	Waste Oil	Gallons	110	55	30	1000				
	CAS No	State	Storage Container		Pressue	Waste Code				
		Liquid	Steel Drum		Ambient	221				
		Type	Davs on Site: 365		Temperature Ambient					

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			Häzardo	us Materials A	and Waste	s inventory	Watrix	Report			
ERS Business/Org.	City of Ro	seville, Roseville Electric			Chemical Loca	ition			CERSID	10207330	
acility Name	Roseville	Energy Park			Recycled 1	Water Tank	Area		Facility	D	
	5120 Phillip	Rd, Roseville 95747							Status	Submitted on 9/1	4/2023 5:18 PM
					Quantities		Annual Waste	Federal Hazard		Hazardous Component (For mixture only)	s
OOT Code/Fire Haz. 0	lass	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
OOT: 3 - Flammabl		Diesel Fuel No. 2	Gallons	290	290	290					7
Combustible Liquid	IS	CAS No		Storage Container		Pressue	Waste Code				
		68476-34-6	Liquid	Aboveground Tank		Ambient	Truste cour	_			
			Туре			Temperature					
			Pure	Days on Site: 365							

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ille Energy Park			Chemical Loca	stion			CERSID	10207330	
			RPEAK - C	TG3 and CT	G4		Facility		
hillip Rd, Roseville 95747							Status	Submitted on 9/1	4/2023 5:18 PM
			Quantities		Annual Waste	Federal Hazard		Hazardous Component (For mixture only)	S
Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
Animoniani riyaroxiae Solation	State	Storage Container	330	600 Pressue	West Code	- Physical Flammable	Aqueous Ammonia	70%	1336-21-6
1336-21-6	Type Pure	Aboveground Tank		Temperature	122	Toxicity - Health Skin Corrosion Irritation - Health Serious			
	Ammonium Hydroxide Solution  CAS No.	Ammonium Hydroxide Solution  CAS No 1336-21-6  Gallons State Liquid Type	and Ammonium Hydroxide Solution Gallons 2640  CAS No 1336-21-6 State Liquid Aboveground Tank Type	Common Name   Unit   Miss. Daily   Largest Cont.	Common Name   Unit   Max. Daily   Largest Cont.   Avg. Daily	Common Name   Unit   Max. Deliry   Largest Cont.   Avg. Daliry   Avg. Daliry   Largest Cont.	Common Name  Unit  Max. Dailly Largest Cont.  Aug. Daily Ammonium Hydroxide Solution  CAS No Liquid  1336-21-6  Liquid  Liquid	Common Name    Common Name   C	CommonName   Unit   Max. Daily   Lagest Cont.   Aug. Daily   Amount   Categories   Component Name   (For mixture only)

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		Hazardous	Materials	And Waste	s Inventor	y Matrix	Report			
CERS Business/Org.	City of Roseville, Roseville Electric			Chemical Loca	ition			CERSID	10207330	
acility Name	Roseville Energy Park			RPEAK are	a			Facility	D	
	5120 Phillip Rd, Roseville 95747							Status	Submitted on 9/1	4/2023 5:18 PM
				Quantities		Annual Waste	Federal Hazard		Hazardous Componen (For mixture only)	ts
DOT Code/Fire Haz. C	Class Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
	Calibration Gases	Cu. Feet State Sto	2000 orage Container	125	700 Pressue	Waste Coo	e	Nitric Oxide Carbon Monoxide		
	CAS No		dinder		Temperature			Oxygen Carbon Dioxide Nitrogen		

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			Hazardo	us Materials	And Waste	s Inventor	y Matrix	Report			
CERS Business/Org.	City of R	oseville, Roseville Electric			Chemical Loca	stion			CERSID	10207330	
Facility Name	Roseville	Energy Park			Steam Tu	rbine Circui	t Breaker	r	Facility	D	
	5120 Philli	p Rd, Roseville 95747							Status	Submitted on 9/1	4/2023 5:18 PM
					Quantities		Annual Waste	Federal Hazard		Hazardous Componen (For mixture only)	ts
DOT Code/Fire Haz.	Class	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
		SF6	Cu. Feet	25.6	25.6	25.6					
		CAS No	State	Storage Container	_	Pressue	Waste Cod	e			
		21272	Gas	Other		Ambient					
			Type Pure			Temperature Ambient					

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CERS Business/Org. Facility Name	City of Roseville, Roseville Electric Roseville Energy Park			Chemical Loca Various	rtion			CERS ID Facility II	10207330	
	5120 Phillip Rd, Roseville 95747							Status	Submitted on 9/1	4/2023 5:18 PM
				Quantities		Annual Waste	Federal Hazard	2	Hazardous Component (For mixture only)	s
OOT Code/Fire Haz. C	lass Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CASNo.
	Equipment Lubricating Oil  CAS No		15000 Storage Container Other	3170	Pressue Ambient Temperature Ambient	Waste Code	=			
	Hydraulic Oil CAS No	Gallons State Liquid Type	250 Storage Container Other Days on Site: 365	150	150 Pressue Ambient Temperature Ambient	Waste Code				3-3
OOT: 2.1 - Flammai	ble Gases Liquefied Petroleum Gas (lpg)  CAS No 74-98-6		t 1000 Storage Container Other	67.7	250 Pressue > Ambient Temperature Ambient	Waste Code	5	Propane Propylene Butanes Sulphur	97% 97% 3% 1%	74-98-6 115-07-1 106-97-8 7704-34-9
	Transformer Insulating Oil  CAS No.	Liquid Type	29000 Storage Container Other Days on Site: 365	7000	Pressue Ambient Temperature Ambient	Waste Code	_			

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ERS Business/Org.	City of Roseville, Roseville Electric			Chemical Loca	tion			CERSID	10207330	
acility Name	Roseville Energy Park			ZLD Area				Facility ID		
	5120 Phillip Rd, Roseville 95747							Status	Submitted on 9/14	1/2023 5:18 PM
						Annual		H	azardous Component	s
				Quantities		Waste	Federal Hazard		(For mixture only)	
OT Code/Fire Haz.		Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name Parrafin Wax	% Wt	EHS CAS No. 8002-74-2
	AntiFoam	Gallons		200	280	144		Hydrotreated Light Dist		64742-47-8
	CAS No		Storage Container Tote Bin	-	Pressue Ambient	Waste Code	_	Strait Run Middle Distil		64741-44-2
		Туре	rote biii		Temperature					
			Days on Site: 365		Ambient					
	AntiFoam	Gallons		400	280			Alkoxylated Alcohol	40%	
	CAS No		Storage Container		Pressue	Waste Code		Water	60%	
	FC2386	Liquid	Tote Bin	-	Ambient		_			
		Туре			Temperature					
	No. 12 No. 2	Mixture	1000		Ambient					
	Anti-Scalant	Gallons		400	280	147				
	CAS No		Storage Container Tote Bin	₹"	Pressue Ambient	Waste Code	<u>_</u>			
		Түре	Tote Bill		Temperature					
			Days on Site: 365		Ambient	=				
	Coagulant	Gallons	800	400	280					
	CAS No	State	Storage Container		Pressue	Waste Code				
	CAS NO	Liquid	Tote Bin	=	Ambient					
		Туре			Temperature					
			Days on Site: 365		Ambient					
	Conntect 6000 Compressor	Gallons		55	55					
	Cleaner		Storage Container	- D	Pressue	Waste Code	_			
	CAS No		Plastic/Non-metali	ic Drum	Ambient Temperature					
		Type	Days on Site: 365		Ambient	-				
	C A-1- 1000/	Pounds	3000	3000	2000					
	Soda Ash 100%		Storage Container	3000	Pressue	Waste Code				
	CAS No		Bag	-	Ambient	- Vedate code	-			
	497-19-8	Туре			Temperature					
			Days on Site: 365		Ambient	-				
OT: 8 - Corrosive	s (Liquids and Sodium Bisulfite	Gallons	800	400	280			Sodium Bisulfite		7631-90-5
olids)	CAS No		Storage Container	_	Pressue			144		
orrosive	7631-90-5	Liquid	Tote Bin		Ambient	Waste Code	_	Water		
JIIOSIVE		Туре			Temperature					
		Mixture	Days on Site: 365		Ambient					
OT: 8 - Corrosive	s (Liquids and Sodium Hydroxide Solid	Gallons	3000	3000	2500			Sodium Hydroxide	50%	1310-73-2
olids)	CAS No		Storage Container		Pressue					
	1310-73-2	Liquid	Aboveground Tank	<	Ambient	Waste Code	_	Water Sodium Chloride	50% 1%	7647-14-5
	dominational	Туре			Temperature	_		Sodium Chloride	1%	/64/-14-5
		Mixture	Days on Site: 365		Ambient					

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CERS Business/Org. Ci	ity of Roseville, Roseville Ele	ctric		Chemical Loca	rtion			CERSID	10207330	
acility Name Re	oseville Energy Park		ZLD Area				Facility ID			
51	20 Phillip Rd, Roseville 95747							Status	Submitted on 9/1	4/2023 5:18 PM
				Quantities		Annual Waste	Federal Hazard		Hazardous Componen (For mixture only)	ts
DOT Code/Fire Haz. Class	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CAS No.
OOT: 8 - Corrosives (Li	quids and Sulfuric Acid	Gallons	6000	6000	4000			Sulfuric Acid	93%	7664-93-9
Solids) Oxidizing, Class 1	CAS No 7664-93-9	Liquid Type	Storage Container Above ground Tank Days on Site: 365		Pressue Temperature	Waste Cod		Water	7%	

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#### ix) Soil & Water-2 – Drainage, Erosion, Sedimentation Control Plan (ESCP)

Once operational, the Project owner shall provide in the annual compliance report information on the results of monitoring and maintenance actives. A field copy of the plan shall be maintained on-site and available for CPM review. The BMP implementation schedule shall reflect actual on-site conditions and location of each erosion and sediment control BMP. The ECSP shall include the following elements.

The REP's ESCP was preceded by its Storm Water Pollution Prevention Plan (SWPPP) as required by its National Pollutant Discharge Elimination System (NPDES) Permit once operational. The attached SWPPP has been maintained and managed to effectively address the items listed below.

In 2017, subsequent to the approval of the 2005 ECSP, the REP submitted a Petition for Staff Approved Modification (Docket #03-AFC-01C) to replace five gravel areas with cement pads. The CEC approved the modification and issued a final notice of determination, determining that the work would not significantly impact the environment, thus waiving the petition to amend. The replacement work was completed between 2019 and 2020.

The REP has continued to maintain the areas as specified in the ECSP and the Best Management Practices (BMP's) outlined in the SWPPP, with no changes made in 2024.

**Vicinity Map** – A map shall be provided indicating the location of all Project elements with depiction of significant geographic features to include watercourses, creeks, wetlands, and sensitive habitat.

**Site Delineation** – The REP site and all Project elements shall be delineated showing boundary lines of all construction areas and the location of existing and proposed structures, pipelines, roads, and drainage facilities.

**Watercourses and Critical Areas** – The ESCP shall show the location of watercourses and critical areas such as creeks, rivers, wetlands and other environmentally sensitive areas. Indicate the proximity of those features to the REP construction site and all pipeline construction corridors.

**Drainage** – The ESCP shall provide a topographic site map showing existing, interim and proposed drainage systems; drainage area boundaries and water shed sizes in acres; the hydraulic analysis to support the selection of BMPs to divert off-site drainage around or through the plant and laydown areas; and all pipeline trenching and boring sites. On the map, spot elevations are required where relatively flat conditions exist. The spot elevations and contours shall be extended off-site for a minimum distance of 100 feet in flat terrain.

**Clearing and Grading** – The plan shall provide a delineation of areas to be cleared of vegetation and areas to be preserved. The plan shall provide elevations, slope, location, and extent of all proposed gradings as shown by contours, cross sections or other means. The locations of any disposal areas, fills, or other special features will also be

shown. Illustrate existing and proposed topography tying in proposed contours with existing topography. The ESCP shall include a statement of the quantities of material excavated or filled for each element of the REP (site and pipeline corridors), whether such excavations or fill is temporary or permanent, and the amount of such material to be imported or exported.

Best Management Practices – The ESCP shall show the location, timing, and maintenance schedule of all erosion and sediment control BMPs to be used prior to initial grading, during Project element excavation and construction, and final grading/stabilization. BMPs shall include measures designed to control dust and stabilize construction access roads and entrances.

**Erosion Control Drawings** -- The erosion control drawings and narrative must be designed and sealed by a professional engineer/erosion control specialist.

# x) SOIL & WATER-7 - Recycled and Potable Water Use Summary Report

	RECYCLE GALLONS	POTABLE GALLONS		RECYCLE GALLONS	POTABLE GALLONS
JANUARY	15,056,242	50,591	MINIMUM	349,362	21,716
FEBRUARY	5,341,952	48,908	MAXIMUM	104,810,325	543,511
MARCH	349,362	43,305	AVERAGE	20,950,507	102,020
APRIL	8,710,706	77,169			
MAY	12,143,821	43,581			
JUNE	13,289,969	60,390			
JULY	27,442,678	123,922			
AUGUST	104,810,325	543,511		ANNUAL TO	TALS
SEPTEMBER	22,841,497	82,645		RECYCLE	POTABLE
OCTOBER	21,342,764	84,874	GALLONS	251,406,080	1,224,244
NOVEMBER	8,356,377	43,634	ACRE-FEET	771.54	3.76
DECEMBER	11,720,388	21,716		Divide gallon by / 325,851	

YEAR	RECYCLE GALLONS	POTABLE GALLONS	AVERAGE RECYCLE	AVERAGE POTABLE	RANGE RECYCLE	RANGE POTABLE
2007	19,393,396	1,121,252	9,696,698	560,626	2,349,468	467,500
2008	173,325,812	19,278,952	1,606,579	1,606,579	25,880,052	13,541,044
2009	195,834,628	231,880	16,319,552	19,323	21,445,908	107,712
2010	133,425,248	97,988	11,118,771	8,166	25,010,128	32,912
2011	44,785,004	323,136	3,732,084	26,928	15,782,052	68,068
2012	165,731,368	665,720	13,810,947	55,477	24,362,360	199,716
2013	165,444,136	586,432	13,787,011	48,869	25,059,496	198,220
2014	135,300,484	480,216	11,275,040	40,018	25,474,636	106,964
2015	176,179,432	471,988	14,681,619	39,332	21,033,012	109,208
2016	115,772,448	41,5888	9,647,704	34,657	24,060,168	120,428
2017	18,581,816	434,588	1,548,484	36,215	5,578,584	107,712
2018	76,291,512	299,948	11,737,155	46,145	14,555,332	80,036
2019	82,147,859	322,410	6,845,655	26,868	15,877,361	88,269
2020	101,108,683	27,300	8,425,723	2,275	24,238,316	5,500
2021	154,064,638	335,874	12,838,720	27,990	20,595,500	44,900
2022	175,013,030	501,942	14,584,419	41,828.50	23,685,507	111,459
2023	103,141,739	374,779	8,595,144	31,231	24,286,191	67,571
2024	251,406,080	1,224,244	20,950,507	102,020	104,460,963	521,795

#### xi) SOIL & WATER-8 – Status Report on Operation of ZLD system

- o **2024**
- No disruptions

#### Maintenance

All routine preventative maintenance tasks were completed in 2024.

Additional maintenance tasks were included but were not limited to:

- Performed belt press repairs and maintenance as needed
- Performed vendor recommended routine maintenance for all pumps and motors
- Performed annual vapor compressor maintenance
- Replace steam traps as needed
- Re-gasket and cleaned heat exchangers for both crystallizer skids
- Replaced various HERO and UF filters as needed
- Performed quarterly silica and hardness analyzer maintenance
- Performed routine inspection and cleaning of waste tanks
- Replaced Vapor Compressor A to increase efficiency
- Replaced Vapor Compressor B to increase efficiency
- Refurbished failed Decarbonator Pump A
- Refurbished failed Decarbonator Pump B
- Refurbished failed BFU Blower 002
- Repaired failed Belt Press Platen

#### Volumes of interim waste streams stored onsite.

- The maximum waste stream volumes stored at any one time are limited to the following onsite storage capacities:
  - NaZ regeneration waste 40,000 gallons
  - WAC neutralized regeneration waste 20,000 gallons
  - HERO reject 40,000 gallons

#### Volumes of residual solids generated and transported to landfills.

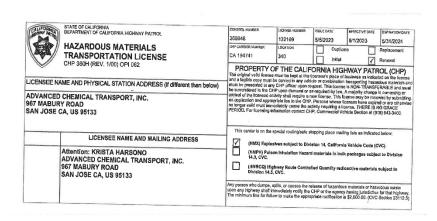
- REP ZLD generated approximately 328 tons of solid waste in 2024.
- All solid wastes were shipped for disposal to Western Placer Waste Management Authority.

#### xii) TRANS-4 - Transport of Hazardous Material

All hazardous materials from REP are transported by Fremouw Environmental Services, which was acquired by Advanced Chemical Transport (ACT), Inc. in 2023–2024. Below is a copy of ACT's current hazardous materials transport license.

Please note that the gap in effective license dates for ACT was due to the company's transition from a corporation (Inc.) to a limited liability company (LLC), which required submission of a new license application under California Highway Patrol (CHP) oversight.

Additionally, CHP conducted terminal inspections at all ACT facilities in California prior to license approval. These inspections began on June 28, 2024, and were completed by October 31, 2024 contributing to the delay in license reissuance.



ALIFORNI	STATE OF CALIFORNIA	CONTROL NUMBER	LICENSE NUMBER	ISSUE DATE	EFFECTIVE DATE	EXPIRATION DATE		
IBHMAY PATRO	DEPARTMENT OF CALIFORNIA HIGHWAY PATROL	273630	273630	11/25/2024	11/25/2024	10/31/2025		
	HAZARDOUS MATERIALS	CHP CARRIER NUMBER	LOCATION	Duplice	ite	Replacement		
	TRANSPORTATION LICENSE	CA 644039	340	✓ Initial		Renewal		
	P 360H (REV. 1/00) OPI 062	PROPERTY Of The original valid license and a leable copy must	must be kept at the I	icensee's place of	business as indica	ated on the license		
LICENSEE NA	AME AND PHYSICAL STATION ADDRESS (If different than below)	must be presented to an be surrendered to the CI	y CHP officer upon re HP upon demand or a	quest. This license is required by law.	o is NON-TRANSF A majority change	ERABLE and mus in ownership or		
ADVANCED CHEMICAL TRANSPORT LLC ACTENVIRO 967 MABURY ROAD SAN JOSE CA, US 95133		control of he licensed activity shall require a new license. This license may be reinwest by subin- an application and appropriate les be his DEP. Persons whose lorenous have supplied or are other PERICO. For licensing information contact CHP. Commercial Vehicle Section at (916) 843-3400.  This cerrier is on the special routing/safe stopping place mailing lists as indicated helion:						
	LICENSEE NAME AND MAILING ADDRESS	(HMX) Explo	sives subject to Div	islon 14, Californ	la Vehicle Code (	(cvc).		
	Attention: Krista Harsono	(HMPH) Poison inhalation Hazard materials in bulk packages subject to Division 14.3, CVC.						
AC	ADVANCED CHEMICAL TRANSPORT LLC ACTENVIRO 967 MABURY ROAD SAN JOSE CA, US 95133	(HMRCQ) HI Division 14.5	ghway Route Contro 5, CVC.	illed Quantity rad	iloactive material	s subject to		
		Any person who dumps, upon any highway shall The minimum line for fai	immediately notify the	CHP or the agenc	cy having jurisdiction	on for that highway		

#### xiii) VIS-2 - Cooling Tower

REP constructed the Cooling Tower according to the CEC approved design. As a result of a prior CEC request, sound dampening walls were installed around fan motors. No further modifications have been made and the Cooling Tower operated throughout 2024 within the approved design parameters.

#### xiv) VIS-4 – Surface Treatment of Project Structures and Buildings

REP constructed the facility according to the plan that was approved by the CEC and the City of Roseville Planning Department.

#### xv) VIS-5 – Landscape Screening

The Blue Oaks / Phillip Road extensions have been completed, however construction and landscaping south of Blue Oaks is not complete therefore this project will be evaluated over the next year.

# xvi) WASTE-5 – 2024 Waste Management Activities

WASTE STREAMS	ACTUAL	PLANNED	COMMENTS
Rags, discarded metal & machine parts, electrical material from routine maintenance, empty containers, other solid waste including typical industrial refuse, office wastes	N/A	N/A	All metals, machine parts and large electrical wastes are recycled. Minor waste streams, ordinary refuse, are not tracked.
Oily rags, oil absorbent	13	N/A	Drums
Sanitary waste	N/A	N/A	Not tracked
Nitrate blowdown of ZLD	709690	N/A	Varies based on facility capacity
Plant equipment drains	N/A	N/A	All drains go to Cooling Tower
Turbine/HRSG wash water	330	330	Washed turbines once, filled 1–330-gal tote.
Cooling Tower sludge	0	0	
Used oil	455	N/A	Varies based on oil analysis and filtration limitations
Used oil filters	8	N/A	Drums
Laboratory analysis waste	0	0	
SCR & CO catalyst units	0	0	
Chemical cleaning waste	0	0	Drums
Condensate from natural gas pipeline	0	0	
Batteries, alkaline, lead acid, nickel cadmium, mercury	0.22	N/A	5-gallon sized tubes collected