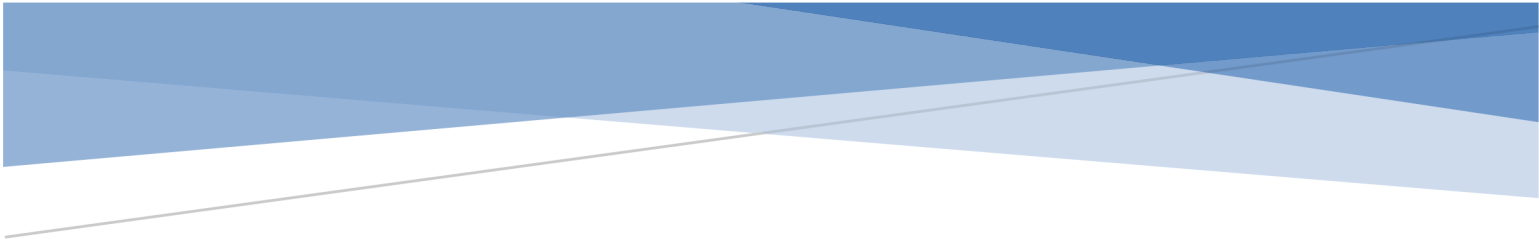


**DOCKETED**

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|-------------------------|-------------------------------------------------|
| <b>Docket Number:</b>   | 00-AFC-01C                                      |
| <b>Project Title:</b>   | Contra Costa Power Plant Project Compliance     |
| <b>TN #:</b>            | 266146                                          |
| <b>Document Title:</b>  | PG&E Petition For Amendment AQ Conditions - GGS |
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| <b>Organization:</b>    | DayZenLLC                                       |
| <b>Submitter Role:</b>  | Applicant Representative                        |
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# PETITION FOR AMENDMENT

GATEWAY GENERATING STATION (00-AFC-1C)

SUBMITTED TO: CALIFORNIA ENERGY COMMISSION

SUBMITTED BY: **PACIFIC GAS & ELECTRIC  
COMPANY (PG&E)**

September 2025



## Section 1 INTRODUCTION

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### 1.1 INTRODUCTION TO PETITION

Pacific Gas & Electric Company (PG&E) files this Petition To Amend (Petition) with the California Energy Commission (Commission) to modify the Gateway Generating Station (GGS) to delete Condition of Certification **AQ-SC13** and modify **AQ-SC12**. This Petition is filed pursuant to Section 1769 of the Commission Regulations<sup>1</sup>. This section describes the procedural background of the GGS, sets forth the purpose and need for the proposed modifications,

Section 2 of the Petition describes the specific modifications proposed to the GGS Conditions of Certification **AQ-SC12** and **AQ-SC13**.

Section 3 contains analysis of the proposed modifications comparing the potential environmental impacts from the modifications to the potential environmental impacts of the GGS as approved in the Commission Final Decision. As discussed in these Sections, PG&E does not anticipate any significant environmental impacts from the proposed modifications proposed in this Petition. Section 3 also contains an analysis demonstrating that the modifications do not increase any potential effects on nearby property owners or the public.

### 1.2 FINAL DECISION BACKGROUND

On June 8, 2001, the Commission issued a Final Decision to authorize the construction and operation of the Contra Costa Unit 8 Power Project, now known as the Gateway Generating Station (GGS)<sup>2</sup>. The GGS Final Decision has been amended several times with the last Petition To Amend being approved by the Commission on October 28, 2016<sup>3</sup>. The Commission also approved a Settlement Agreement relating to potential visible stack emissions from the GGS on August 2, 2018 (Settlement Agreement) which added Conditions of Certification **AQ-SC12** and **AQ-SC13** to the GGS License.<sup>4</sup> These Conditions of Certification are the subject of this Petition.

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<sup>1</sup> Title 20 CCR 1769.

<sup>2</sup> Final Decision approving and Petition For Amendment to change the name from Contra Costa Unit 8 Power Project, to Gateway Generating Station, TN 39055, January 23, 2007.

<sup>3</sup> Notice of Determination for Petition to Amend Gateway Generating Station to install a New Storm Water Treatment System, TN 214245, October 28, 2016

<sup>4</sup> Order approving Settlement Agreement Order No: 18-0801-5, TN 224369, August 2, 2018; Settlement Agreement, TN 224461, August 10, 2018 .

### 1.3 PURPOSE AND NEED FOR AMENDMENT

The following brief background is provided to provide context relating to the addition of Conditions of Certification **AQ-SC12** and **AQ-SC13** to the GGS License as part of the Settlement Agreement.

- Major maintenance, including inspection and repairs on the major combustion turbines, the Heat Recovery Steam Generators (HRSGs), and steam turbines, as well as valve work, occurred at the GGS facility between March 27, 2016, and May 27, 2016. Full operations resumed on May 27, 2016.
- PG&E received four complaints between May 28, 2016, and June 22, 2016, alleging that emissions associated with the operations at the GGS facility caused damage to boats and other personal property located in the city of Antioch, approximately 0.25 miles east of GGS.
- Internally, the GGS facility was initially unaware of complaints since the complaints were sent to a PG&E corporate office that is not directly related to, or involved in, operations and compliance activities at GGS.
- When the GGS facility became aware of the complaints, PG&E notified the Commission by telephone on August 29, 2016, and provided a written report of the complaints on September 2, 2016. PG&E contracted the Rimkus Consulting Group to help better understand the issue. Their review concluded that the reddish-brown material deposited on the boats was “suggestive that the major constituent contributing to the stain was iron.” However, due to the inadvertent delay in reporting the complaints, the Commission was unable to investigate the root cause of the boat damage in a timely manner.
- GGS’s Conditions of Certification contained in the Final Decision require reporting complaints to the Commission Compliance Project Manager (CPM) within 10 days of receipt. GGS was out of compliance with reporting requirements. As a result of this noncompliance, the Commission added Conditions of Certification **AQ-SC12** and **AQSC-13**, and amended the reporting of complaints, notices, and citation requirements.

Condition of Certification **AQ-SC12** limits single source visible emissions to opacity less than Ringelmann No. 1.

Condition of Certification **AQ-SC13** requires PG&E to perform a Visual Emissions Evaluation (VEE) using EPA Method 9 during any restart of the turbine following any maintenance activities requiring the HRSG to be opened. Notification to both the Bay Area Air District (the Air District) and the Commission is required before the VEE can be performed and the facility made available for inspection.

PG&E has complied with VEE requirements for the past 6 years and no evaluated air containment emissions have been No.1 or darker on the Ringelmann Chart demonstrating consistent compliance with Condition of Certification **AQ-SC12**. Also, PG&E has made the GGS facility available for inspection at any time and implemented additional resources to manage public complaints. PG&E has a call line for public complaints to be filed and has posted signs outside the plant with the phone number of the call line.

The VEE requirements, as outlined in Condition of Certification **AQ-SC13**, present an operational burden to the GGS facility by limiting how quickly the plant can restart operations after an outage. Relevant considerations that impact GGS's ability to operate are outlined below:

- GGS must make arrangements for a certified VEE individual to be onsite and must notify the Commission and the Air District before they can restart operations.
- Many scheduled outages occur at nighttime so GGS must delay restarting operations for daylight when the VEE can be completed.
- VEE Certification for California is valid for a period of only 6 months at a time, requiring recertification and associated delays if the certified VEE individual is unable to attend the certification opportunities (strictly offered by CARB for only a few dates every six months) for emergent reasons (like sickness, leave of absence, etc.)

At crucial operating times, such as hot summer temperatures, the VEE requirements could delay the restart of operations, negatively impacting PG&E customers and creating unnecessary risk. The GGS plant is at a competitive disadvantage as other plants do not have VEE requirements.

Additionally the Commission should consider the following to support the approval of this Petition: After consultation with Staff, PG&E has proposed the inclusion of the following five additional precautionary measures in Condition of Certification **AQ-SC12**.

- a. Thorough inspection will be performed.
- b. Loose debris will be removed by appropriate means.
- c. Thorough vacuuming of internal flue gas spaces including catalyst faces.
- d. In the event of extended (greater than 60 days) dry lay-up, a means to dehumidify the internal flue gas space will be installed and utilized.
- e. During abrasive blasting activities to address tube bundle fouling, the exhaust stack will be blinded using a suitable method while the work is being performed.

PG&E has implemented Items a, b, c and e routinely for the past 6 years during which there has been no visible emissions identified pursuant to Condition of Certification **AQ-SC13**, and there have been no complaints. Staff suggested the inclusion of Item d and we have incorporated it here, although it is unlikely that the GGS would have a dry lay-up in excess of 60 days.

Therefore, with PG&E's proven practices incorporated into the Condition of Certification **AQ-SC12**, and its demonstrated through visible emissions inspections and the lack of complaints for the last six years, the Commission should approve this Petition in its entirety.

#### **1.4 INFORMATION NOT KNOWN AT TIME OF FINAL DECISION**

The information contained in this Petition could not have been known at the time of the Final Decision because the Settlement Agreement adding Conditions of Certification **AQ-SC12** and **AQ-SC13** were added to the Final Decision 17 years after the issuance of the Final Decision.

#### **1.5 MODIFICATIONS DO NOT UNDERMINE FINAL DECISION**

The modifications do not undermine the Final Decision as amended by the Settlement Agreement because while Condition of Certification **AQ-SC13** is proposed for deletion, **AQ-SC12** has been modified to ensure that visible emissions continue to meet applicable standards and PG&E continues to implement its current Best Management Practices that have eliminated complaints for the last 6 years, thereby avoiding any potential impacts.

#### **1.6 PROPERTY OWNERS**

The ownership of some of the properties currently on the notice list has changed. PG&E is working internally with its Land Department and the City and will submit a modified Notice List under separate cover when available.

## **Section 2            DESCRIPTION OF MODIFICATIONS**

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This section provides proposed modifications to the Conditions of Certification **AQ-SC12** and **AQ-SC13**. PG&E requests that Condition of Certification **AQ-SC13** be deleted as it is no longer necessary and that Condition of Certification **AQ-SC-12** be modified as follows:

**AQ-SC12** Except for temporary sandblasting operations and the fire pump engine, the project owner shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

- a. As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

**The project owner shall implement the following precautionary measures to ensure loose debris that could exit the heat recovery generator exhaust stack, will be mitigated following maintenance activities. These measures could include, but are not limited to:**

- a. **Thorough inspection will be performed.**
- b. **Loose debris will be removed by appropriate means.**
- c. **Thorough vacuuming of internal flue gas spaces including catalyst faces.**
- d. **In the event of extended (greater than 60 days) dry lay-up, a means to dehumidify the internal flue gas space will be installed and utilized.**
- e. **During abrasive blasting activities to address tube bundle fouling, the exhaust stack will be blinded using a suitable method while the work is being performed.**

**Verification: The project owner shall certify compliance with the condition in the quarterly reports required by condition AQ-14. The project owner shall report all instances of non-compliance with the condition in writing to the Compliance Project Manager (CPM) within 10 calendar days of the discovery of the incident.**

The project owner shall make the site available for inspection by representatives of the Bay Area Air Quality Management District (BAAQMD), California Air Resources Board

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### **Gateway Generating Station**

(ARB), United States Environmental Protection Agency (EPA) and California Energy Commission (Energy Commission) Compliance Project Manager (CPM).

### **Section 3 ENVIRONMENTAL AND AFFECT ON NEARBY PROPERTY OWNER ANALYSES**

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The proposed modifications to the Condition of Certification **AQ-SC12** and the deletion of **AQ-SC13** were added to ensure that operation and maintenance of the GGS would not result in environmental impacts and impacts to nearby property owners as identified in the complaints. Specifically, **AQ-SC12** continues to provide objective VEE standards, and with the modifications proposed by PG&E ensures that PG&E will continue to implement its Best Management Practices during maintenance and restart, which have successfully eliminated the types of complaints received in 2016.