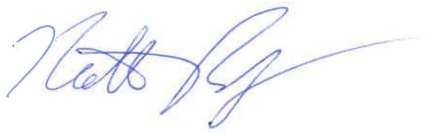
DOCKETED	
Docket Number:	21-TPG-01
Project Title:	Roseville Energy Park Temporary Power Generators
TN #:	266947
Document Title:	RPEAK (REPR-20-03 AND 04) Quarterly CEMS Report - Third Quarter 2025 - Part 4s
Description:	N/A
Filer:	Roseville Electric Compliance
Organization:	Roseville Electric
Submitter Role:	Public Agency
Submission Date:	10/30/2025 5:01:38 PM
Docketed Date:	10/31/2025

Follow-Up Actions:

While it is common practice to have an operator stationed at RPEAK during engine start-ups, operators will stand by the field breaker and motor starter when able during start evolutions. Staff will continue to monitor and observe proper system operation.

There have been no subsequent trips of CT5's water injection pump at the time of writing this memo.

Respectfully,



Nathan Ribordy, P.E.
(916) 746-1673
nribordy@roseville.ca.us

Startup/Shutdown Event Report

CT5 - NOx Lbs Per Startup/Shutdown

From: 08/20/2025 00:00 **To:** 08/20/2025 23:59 **Facility Name:** ROSEVILLE ENERGY
Generated: 08/21/2025 10:43 **Location:** Roseville, CA
Tag Name: CT5_NOx_LbPerHr_1M
SI = SampleInvalid, * = Excess Emission

Total Operating Time: 4.83 Hours
Non-Operating Time: 19.17 Hours Report Time: 24.00 Hours

Unit Operation and Excess Events

Event Period				Reason	Action
Begin/End	Duration in Minute(s)	Lb/Event	Limit	Code - Description	Code - Description
08/20/2025 11:53 08/20/2025 12:03 Startup	11	1.14	3.10		
08/20/2025 12:37 08/20/2025 12:44 Shutdown	8	2.99	3.40		
08/20/2025 13:51 08/20/2025 14:03 Startup	13	4.78 *	3.10	Control equipment problems	Process held at specific load then returned to normal operations
08/20/2025 14:49 08/20/2025 14:56 Shutdown	8	2.52	3.40		
08/20/2025 18:14 08/20/2025 18:24 Startup	11	1.18	3.10		
08/20/2025 20:58 08/20/2025 21:05 Shutdown	8	0.12	3.40		

Total Duration of Excess Emission	**13**	**Minute(s)**
Time of Excess Emission as a percentage of operating time	**4.48**	**%**
Time in compliance as percentage of operating time	**95.52**	**%**

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Total Operating Time: 4.83 Hours
Non-Operating Time: 19.17 Hours Report Time: 24.00 Hours

Event Invalid Information

No invalid events were found in the reporting period.

Startup/Shutdown Event Report

CT5 - NOx Lbs Per Startup/Shutdown

From: 08/20/2025 00:00 **To:** 08/20/2025 23:59 **Facility Name:** ROSEVILLE ENERGY

Generated: 08/21/2025 10:43 **Location:** Roseville, CA

Tag Name: CT5_NOx_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 4.83 Hours

Non-Operating Time: 19.17 Hours Report Time: 24.00 Hours

Periodic Excess and Invalid Summary

Emission Data Summary

1.	Duration of excess emission in event reporting period due to:	
	a. Startup/shutdown	0
	b. Control equipment problems	0
	c. Process problems	0
	d. Other known causes	0
	e. Unknown causes	13
2.	Total Duration of Excess Emission in Minute(s)	13
3.	Time of Excess Emission as a percentage of operating time	4.48
4.	Time in compliance as percentage of operating time	95.52

CMS Performance Summary

1.	CMS downtime in event reporting period due to:	
	a. Monitor equipment malfunctions	0
	b. Non-Monitor equipment malfunctions	0
	c. Quality assurance calibration	0
	d. Other known causes	0
	e. Unknown causes	0
2.	Total CMS Downtime in Minute(s)	0
3.	Total Downtime as a percentage of operating time	0.00
4.	Total Availability as a percentage of operating time	100.00

TYPICAL START-UP

Sample Spreadsheet Listing

	CT5_GasFlow_kscfh_1M			CT5_WaterInj_GPM_1M			CT5_NOx_SCR_Ppm_1M			CT5_NH3Inj_LbPerHr_1M			CT5_NOx_Ppmvdc_1M			CT5_NOx_SUSD_Lbs_1M		
Date/Time	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**
08/25/25 11:52	0.3			0			0			0.1			-0.2			0		
08/25/25 11:53	0.9			0			0			0.2			-0.2			0		
08/25/25 11:54	26.1			0.7			3.6			0			-5.9			0		
08/25/25 11:55	34			0			12.1			0.2			16.36			0.04		
08/25/25 11:56	41.9			0			14.4			-0.1			24.58			0.11		
08/25/25 11:57	42.4			0			17.6			0			29.5			0.19		
08/25/25 11:58	129.8			5.3			18			-0.1			26.86			0.42		
08/25/25 11:59	232.3			23.9			29.4			66.6			26.55			0.82		
08/25/25 12:00	257.2			28.9			24.9			99.4			8.67			0.96		
08/25/25 12:01	254.6			28.8			23.8			97.9			0.55			0.97		
08/25/25 12:02	254.4			28.6			23.2			98			0.46			0.98		
08/25/25 12:03	253.4			28.4			23.1			97.9			0.65			0		
08/25/25 12:04	251.7			28.1			23.3			99.8			0.84			0		
08/25/25 12:05	253.3			27.9			23.6			100.2			1.12			0		
08/25/25 12:06	251.5			27.7			23.6			97.9			1.45			0		
08/25/25 12:07	251.9			27.7			22.9			97.5			1.76			0		
08/25/25 12:08	250.8			27.5			21.8			96.9			1.64			0		
08/25/25 12:09	251.5			27.4			20.5			92.4			1.22			0		
08/25/25 12:10	251.4			27.2			19.9			86.4			0.91			0		
08/25/25 12:11	250.6			27.1			19.6			82.4			0.91			0		
08/25/25 12:12	250			27			19.3			79.9			0.91			0		
08/25/25 12:13	250.8			27			19.3			77.1			1.02			0		
08/25/25 12:14	250.6			26.8			19.8			77			1.13			0		
08/25/25 12:15	251.3			26.8			20.2			77.2			1.36			0		
08/25/25 12:16	249.3			26.7			20.5			76.9			1.48			0		
08/25/25 12:17	250.8			26.7			20.6			77.1			1.48			0		
08/25/25 12:18	250.6			26.7			20.6			76.6			1.62			0		
08/25/25 12:19	249.3			26.7			20.6			73.9			1.59			0		
08/25/25 12:20	248.9			26.6			20.1			73.8			1.59			0		
08/25/25 12:21	248.6			26.5			19.4			70.8			1.48			0		
08/25/25 12:22	250.3			26.6			19.2			71.1			1.48			0		
08/25/25 12:23	251.2			26.6			19.2			69.2			1.48			0		

~5MIN

Sample Spreadsheet Listing

	CT5_GasFlow_kscfh_1M			CT5_WaterInj_GPM_1M			CT5_NOx_SCR_Ppm_1M			CT5_NH3Inj_LbPerHr_1M			CT5_NOx_Ppmvdc_1M			CT5_NOx_SUSD_Lbs_1M		
Date/Time	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**	**Value**	**SI**	**Modc**
08/20/25 13:50	-0.1			0			-0.2			0			-0.2			0		
08/20/25 13:51	0			0			-0.2			0			-0.2			0		
08/20/25 13:52	15.5			3.1			0.4			0			-0.2			0		
08/20/25 13:53	31.4			0			9.1			0			12.15			0.02		
08/20/25 13:54	41.4			0			11.4			0			27.73			0.09		
08/20/25 13:55	41.5			0			16.3			0			34.06			0.18		
08/20/25 13:56	96.3			1.1			16.7			2.3			31.55			0.38		
08/20/25 13:57	202.7			0			100			61.9			64.21			1.22		
08/20/25 13:58	202			0			100			70.7			123.58			2.84		
08/20/25 13:59	100.7			0.1			100			40.1			163.4			3.91		
08/20/25 14:00	123.7			4.4			100			36.6			78.41			4.54		
08/20/25 14:01	224.4			23.4			27.3			75.9			13.4			4.74		
08/20/25 14:02	268.5			31.2			25.3			105.5			1.26			4.76		
08/20/25 14:03	269.3			31.1			24.8			106.2			1.03			4.78		
08/20/25 14:04	268.9			31			23.8			106.1			1.31			0		
08/20/25 14:05	268.6			30.9			23.3			107.2			1.67			0		
08/20/25 14:06	268.4			30.8			22.6			111.4			2.07			0		
08/20/25 14:07	268.5			30.7			21.3			111.8			1.93			0		
08/20/25 14:08	267.8			30.6			20.4			106.2			1.53			0		
08/20/25 14:09	268			30.6			19.7			100.3			1.22			0		
08/20/25 14:10	268			30.6			19.4			95.6			1.11			0		
08/20/25 14:11	267.5			30.7			19.2			94			1.13			0		
08/20/25 14:12	267.7			30.6			19.1			93.7			1.25			0		
08/20/25 14:13	267.6			30.6			19.1			91.6			1.25			0		
08/20/25 14:14	267.6			30.6			19.1			90.5			1.25			0		
08/20/25 14:15	267.3			30.5			19.1			88.1			1.36			0		
08/20/25 14:16	267.2			30.5			19.1			88.1			1.36			0		
08/20/25 14:17	266.9			30.5			19.2			86			1.48			0		
08/20/25 14:18	267.1			30.4			19.3			85.3			1.48			0		
08/20/25 14:19	266.9			30.4			19.3			83.6			1.59			0		
08/20/25 14:20	266.4			30.3			19.4			83.1			1.59			0		
08/20/25 14:21	266.3			30.1			19.6			83.1			1.7			0		

~9/min

| | | | | | 2 0 2 5 0 1 9 |
Year — Non-Compliance Event Number

Placer County Air Pollution Control District
110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • www.placer.ca.gov/apcd
Erik C. White, Air Pollution Control Officer

NON-COMPLIANCE EVENT NOTIFICATION FORM – PART I

submit within 2 business hours after detection of the Non-Compliance Event

1. Company Name ROSEVILLE ENERGY PARK - RPEAK	**Address** 5120 PHILLIP ROAD, ROSEVILLE, CA.
2. Title V Source Status Major Yes ☒ No ☐	Synthetic Minor Yes ☐ No ☒
3. For Title V Sources, is the Non-Compliance Event the Result of an Emergency under District Rule 507, Section 402.2(I)	Yes ☐ No ☒
4. Emission Exceedances NOx ☒ SOx ☐ PM ☐ VOC ☐ CO ☐ Opacity ☐ None ☐	check all that apply
5. CEMS / COMS / CMS Breakdown Yes ☐ No ☒	
6. Detection of Non-Compliance Event Date 8/23/25 Time 21:00	☐ AM ☒ PM
7. Start of Non-Compliance Event Date 8/23/25 Time 20:00	☐ AM ☒ PM ☐ Not known
8. Violation Permit No. REPR-20-03 Condition No. 34 Rule	Section
9. Unit / Equipment Involved CT5	
10. Description / Cause of Non-Compliance Event NOx Hour Ave., load change	☒ additional information attached
11. Immediate Corrective Actions Shutdown unit	☒ additional information attached
12. Was the Non-Compliance Event an Emission Violation or Monitoring Equipment Failure or Malfunction Yes ☐ No ☒ If yes, do you Request that the Violation, Failure or Malfunction be Shielded from Enforcement Action as an Upset / Breakdown Pursuant to District Rule 404	
Yes ☐ No ☐ Not Able to Determine at this Time ☒	If "Yes", complete and submit the Upset / Breakdown Checklist Form with Part I
13. Submitted By NATHAN RIBORDY	**Telephone** (916) 746 - 1673
Signature [signature]	Date 8/25/25 Time 11:25 ☒ AM ☐ PM

NON-COMPLIANCE EVENT NOTIFICATION FORM – PART II

submit within 7 calendar days after end of the Non-Compliance Event

14. End of Non-Compliance Event Date 8/23/25 Time 2059	☐ AM ☒ PM
15. Duration of Non-Compliance Event Hours 1	Minutes
16. Excess Emissions Estimates NOx 2.7 ppmvdc 1-HR SOx	PM
VOC CO Opacity %, for minutes	Other
17. Variance in Effect Yes ☐ Variance #	No ☒
18. Corrective and Preventative Actions Taken (a) Minimize Emissions (b) Correct Event (c) Prevent Future Events ☒ additional information attached	
19. If Not Able to Determine in Item 12 of Part I, Was the Non-Compliance Event an Emission Violation or Monitoring Equipment Failure or Malfunction If yes, do you Request that the Violation, Failure or Malfunction be Shielded from Enforcement Action as an Upset / Breakdown Under District Rule 404	
Yes ☐ No ☒	If "Yes", complete and submit the Upset / Breakdown Checklist Form if not previously submitted with Part I
20. Submitted By NATHAN RIBORDY	**Telephone** (916) 746 - 1673
I certify under penalty of law that I am the responsible official for this facility, or his/her duly designated representative, and based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.	
Signature [signature]	Date 8/26/25 Time 1400 ☐ AM ☒ PM

Year
2 0 _ _ - _ _ _

Non-Compliance Event Number

UPSET / BREAKDOWN AND EMERGENCY CHECKLIST

Company Name		Address	
Detection of Non-Compliance Event	Date	Time	☐ AM ☐ PM

Complete the following questions associated with determining whether an event is an "Upset/Breakdown" Event pursuant to Rule 404, and/or an "Emergency" Event pursuant to Rule 507. To be considered as a legitimate Upset / Breakdown or Emergency event, all of the checklist questions must be answered with a "Yes" checkmark.

Yes	No		
☐	☐	1.	Equipment associated with the breakdown event have been designed, maintained, and operated in a manner consistent with minimizing emissions.
☐	☐	2.	The amount and duration of emissions as a result of the event have been minimized.
☐	☐	3.	The event is not part of a recurring pattern of previous breakdowns of the same equipment for same/similar reasons that are indicative of inadequate equipment design, operation, or maintenance.
☐	☐	4.	The event is not the result of operator error, negligence, carelessness, or willful misconduct (i.e., the facility is being properly operated).
☐	☐	5.	The event is not the result of improper equipment design.
☐	☐	6.	The event is not the result of improper preventative maintenance of equipment.
☐	☐	7.	The event is the result of a sudden, unavoidable breakdown of equipment, beyond the control of the operator.
☐	☐	8.	The event could not have been foreseen or avoided or planned for, and could not have been avoided or prevented by better operating and maintenance practices.
☐	☐	9.	The event has not resulted in a nuisance.
☐	☐	10.	The event is not the result of the disregard of air pollution rules or regulations.
☐	☐	11.	This Upset / Breakdown form has been completed and submitted to the District in a timely manner -- within 7 calendar days from the end of the Non-Compliance Event.
☐	☐	12.	Immediate corrective actions have been taken to minimize emissions, as described in Item 11 on the Part I Non-Compliance Event Notification Form.

I certify under penalty of law that I am the responsible official for this facility, or his/her duly designated representative, and based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Signature _____

You are requesting that the District not take enforcement action because the Non-Compliance Event is the result of an "Upset / Breakdown" Event under District Rule 404. A breakdown condition means an unforeseeable failure or malfunction of 1) any air pollution control equipment or related operating equipment which causes a violation of any emission limitations or restriction prescribed by the District Rules and Regulations, or by State law, or 2) any in-stack continuous monitoring equipment, where such failure or malfunction: (1) is not the result of neglect or disregard of any air pollution control law or rule or regulation; (2) is not intentional or the result of negligence; (3) is not the result of improper maintenance; (4) does not constitute a nuisance; (5) is not a recurrent breakdown of the same equipment. You have the burden of providing sufficient information to demonstrate that the Upset / Breakdown was an unforeseeable equipment failure or malfunction that meets the above listed criteria. This checklist must be completed and returned to the District with either the Part 1 or Part II Non-Compliance Event Notification form to attest to your having made this determination. Submission of a request for shielding from enforcement action does not by itself confer such a shield. If breakdown or emission exceeding operations continue after the breakdown or emission exceedance is identified, the possibility exists that the District after consideration of the information provided, the timeliness and completeness of the submittals, and a comparison to other like breakdowns, may ultimately determine that the Non-Compliance Event was not the result of a legitimate Upset / Breakdown event and may elect to take enforcement action. Action to return to compliance should be accomplished as expeditiously as possible. Thus, you are advised to: (1) assure that the breakdown meets the criteria for an unforeseeable failure or malfunction; (2) minimize emissions resulting from the event to the maximum degree possible; and (3) assure that the required failure and malfunction information and information on the corrective actions taken is provided to the District in a complete and timely manner.

CITY OF ROSEVILLE CALIFORNIA

Memorandum

Roseville Electric - Generation

To: Bruce Springsteen, *Manager, Compliance and Enforcement, PCAPCD*
Heather Selvester, *Air Quality Specialist, PCAPCD*

From: Nathan Ribordy, *Power Generation Superintendent*

Date: August 26, 2025

Subject: Non-Compliance Event Notification #2025-019 PART II

This memo provides supplemental details to the Non-Compliance Event Notification #2025-019 submitted on August 25, 2025, regarding an incident involving RPEAK Combustion Turbine #5 (CT5) on August 23, 2025.

Incident Summary:

- **Fuel Flow Start:** 13:57
- **Full Load Achieved:** 14:04
- **Fuel Flow Stop:** 20:12
- **Event:** Excess emissions NOx ppmvdc 1-hour from 20:00-21:59
- **Response:** Engine was shut down.
- **Investigation:** Typical engine stops are initiated from steady state at base load. CT5 was load following the dispatch operating target (DOT) issued by the California Independent System Operator (CA ISO) and was in process of reducing load before shutdown. The transient (Attachment) prior to the shutdown command being initiated resulted in a swing in emissions. The resultant swing coupled with an engine shutdown resulted in high NOx emissions leading into the 2000 hour.

Follow-Up Actions:

Operators were briefed on the engine limitations regarding shutdown activities. Plant staff coordinated with the power scheduler to ensure future DOTs issued by CA ISO won't result in engine ramps immediately preceding a shutdown.

Respectfully,

Nathan Ribordy, P.E.
(916) 746-1673
nribordy@roseville.ca.us


California ISO | Automated Dispatch System
Interval | RT DOT/FR | Hourly DOT | Exceptional | Commitment | FMM AS | Hourly AS | Opr Instruction | AS Test
Current Interval | 21:15-21:20 | 21:00-22:00 | | 21:15-21:30 | 21:15-21:30 | 21:00-22:00 | |
Dispatch Interval | 21:20-21:25 | 22:00-23:00 | | 21:45-22:00 | 21:45-22:00 | 22:00-23:00 | |
Received/Status | 21:16:21 | 20:59:07 | 21:16:21 | 21:17:39 | 21:17:42 | 20:59:24 | Idle | Idle
System Messages
08/23/2025 21:17:42 Received new FI AC194215CC10
08/23/2025 21:17:42 Received new FI AC194215CC10
08/23/2025 21:17:39 Received new U AC194215CC10
08/23/2025 21:16:21 Received new E FF84-AC194250
08/23/2025 21:16:21 Received new 5 AC19425D0C17
Filter Resources
Hourly Pre-Dispatch
Valid | Res Type | Resource ID | DOT Type | Config ID | SC ID | RT DOT | RT Prev DOT | RT DOT Delta | Current DOT Delta | DOT Start Time | DOT End Time | RTD FRD | RTD FRU | AS Test Constraint MW | ED Fixed | ED Max | ED Min | Unit Commitment | Commitment Start Time | Commitment End Time
GEN | REP_6_UNITS | DOT | REP_6_UNITS_2X1DF | ROSE | 135.00 | 130.00 | 5.00 | | 21:22
GEN | RPEAK_6_UNITS | DOT | | ROSE | 28.00 | 28.00 | 0.00 | | 21:22
GEN | RPP2_6_CTG1 | DOT | | ROSE | 0.00 | 0.00 | 0.00 | | 21:22
GEN | RPP2_6_CTG2 | DOT | | ROSE | 0.00 | 0.00 | 0.00 | | 21:22
Trajectory Plot: RPEAK_6_UNITS
50.0
40.0
30.0
20:20 20:30 20:40 20:50 21:00 21:10 21:20 21:30 21:40 21:50 22:00
DOT
DOP
Instructions - Resource ID: RPEAK_6_UNITS
Valid | Accept DOT | Instr MW | Start Time | Prev Goto
28.00 | 28.00 | 21:22 | 28.00
28.00 | 28.00 | 21:17 | 28.00
28.00 | 28.00 | 21:12 | 30.75
30.75 | 30.75 | 21:07 | 36.25
36.25 | 36.25 | 21:02 | 41.75
41.75 | 41.75 | 20:57 | 47.25
47.25 | 47.25 | 20:52 | 50.00
50.00 | 50.00 | 20:47 | 50.00
50.00 | 50.00 | 20:42 | 50.00
50.00 | 50.00 | 20:37 | 50.00
50.00 | 50.00 | 20:32 | 50.00
50.00 | 50.00 | 20:27 | 50.00
50.00 | 50.00 | 20:22 | 50.00
CONNECTED
RCONTROLROOMXX17037 | APP_ADS_READONLY [CARP, SRRV, ROSE] | PRODUCTION 1351_3 | VERSION: 1.4.3-29 | BUILD TIMESTAMP: 01-13-202
SHARP