DOCKETED	
Docket Number:	21-TPG-01
Project Title:	Roseville Energy Park Temporary Power Generators
TN #:	266952
Document Title:	RPEAK (REPR-20-03 AND 04) Quarterly CEMS Report - Third Quarter 2025 - Part 3s
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

	CT5_NOx_S	CR_Ppm_1M	CT5_NH3Slip	_Ppmvd	lc_1M	CT5_NOx_F	pmvdc	_1M	T5_ExhaustFlo	w_Lb	PerHr_1N	CT5_GasFlo	w_ksc	fh_1M	CT5_Load	_MW	e_1M
Date/Time	Value	SI Modc	Value	SI I	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Mode
08/06/25 16:57	27.4		10.7			2.38			753446.8		-	270.9			28.3		
08/06/25 16:58	27.4		10.8			2.38			749496.5			269.5			28.3		
08/06/25 16:59	27.4		10.8			2.38			748706.4			269.2			28.3		
08/06/25 17:00	27.5		10.8			2.38			748443.1			269.1			28.3		
08/06/25 17:01	27.7		10.7			2.38			749496.5			269.5			28.3		
08/06/25 17:02	27.9		10.7			2.38			748179.7			269			28.3		
08/06/25 17:03	28.2		10.6			2.38			748443.1			269.1			28.3		
08/06/25 17:04	28.3		10.7			2.5			748706.4			269.2			28.3		
08/06/25 17:05	28.3		10.9			2.5			749496.5			269.5			28.3		
08/06/25 17:06	28.4		10.9			2.5			747653			268.8			28.3		
08/06/25 17:07	28.4		10.8			2.5			751076.6			270.1			28.3		
08/06/25 17:08	28.3		10.9			2.38			747916.4			268.9			28.3		
08/06/25 17:09	28.2		10.9			2.38			748179.7			269			28.3		
08/06/25 17:10	28.1		11			2.38			747916.4			268.9			28.3		
08/06/25 17:11	28		10.9			2.27			748706.4			269.2			28.3		
08/06/25 17:12	27.8		11			2.27			747916.4			268.9			28.3		
08/06/25 17:13	27.7		10.7			2.16			748706.4			269.2			28.3		
08/06/25 17:14	27.7		10.8			2.16			744492.8			267.7			28.2		
08/06/25 17:15	27.9		10.8			2.27			745282.9			268			28.2		
08/06/25 17:16	27.9		10.7			2.27			750023.2			269.7			28.3		
08/06/25 17:17	27.8		10.8			2.27			745546.2			268.1			28.2		
08/06/25 17:18	27.8		10.7			2.27			748443.1			269.1			28.3		
08/06/25 17:19	27.8		10.7			2.27			747653			268.8			28.3		
08/06/25 17:20	27.9		10.7			2.38			747653			268.8			28.3		
08/06/25 17:21	28.2		10.9			2.38			747916.4			268.9			28.3		
08/06/25 17:22	28.4		10.8			2.38			747653			268.8			28.3		
08/06/25 17:23	28.4		10.8			2.38			733958.8			263.9			27.6		
08/06/25 17:24	28.1		10.3			2.43			740026.2			261			27.3		
08/06/25 17:25	27.8		10.4			2.31			738952.1			260.6			27.3		
08/06/25 17:26	27.6		10.3			2.31			743248.4			262.1			27.3		
08/06/25 17:27	27.6		10.2			2.2			740026.2			261			27.3		
08/06/25 17:28	27.6		10.1			2.2			740831.7			261.3			27.3		
08/06/25 17:29	27.7		10.1			2.31			741368.8			261.5			27.3		
08/06/25 17:30	27.7		10.1			2.31			740563.2			261.2			27.3		
08/06/25 17:31	27.6		10.1			2.31			739489.2			260.8			27.2		

	CT5_NOx_S	CR_Ppm_1M	CT5_NH3Slip	_Ppmvdc_1M	CT5_NOx_P	pmvdc_1M	T5_ExhaustFlo	ow_LbP	erHr_1N	CT5_GasFlo	w_ksc	fh_1M	CT5_Load	_MWe	e_1M
Date/Time	Value	SI Mode	Value	SI Mode	Value	SI Mode	Value	SI	Modc	Value	SI	Modc	Value	SI	Mode
08/06/25 17:32	27.6		10.1		2.31		739757.7			260.9			27.3		
08/06/25 17:33	27.6		10.2		2.31		738683.6			260.5			27.2		
08/06/25 17:34	27.7		10.1		2.31		739757.7			260.9			27.3		
08/06/25 17:35	27.8		10		2.31		744053.9			262.4			27.3		
08/06/25 17:36	28		10.1		2.31		739489.2			260.8			27.3		
08/06/25 17:37	27.9		10.2		2.31		740026.2			261			27.3		
08/06/25 17:38	27.9		10.1		2.31		739757.7			260.9			27.3		
08/06/25 17:39	27.9		10.1		2.2		737878.1			260.2			27.2		
08/06/25 17:40	27.8		10.1		2.31		738683.6		1 1 1 1	260.5			27.2		
08/06/25 17:41	27.7		10.1		2.2		738415.1			260.4			27.3		
08/06/25 17:42	27.7		9.9		2.2		741637.3			261.6			27.3		
08/06/25 17:43	27.6		9.8		2.2		740563.2			261.2			27.3		
08/06/25 17:44	27.5		9.8		2.2		738146.6			260.3			27.3		
08/06/25 17:45	27.4		9.8		2.2		739220.7			260.7			27.3		
08/06/25 17:46	27.4		9.8		2.2		740294.7			261.1			27.3		
08/06/25 17:47	27.4		9.7		2.2		742174.3			261.7			27.3		
08/06/25 17:48	27.3		9.6		2.08		739757.7			260.9			27.3		
08/06/25 17:49	27.1		9.4		2.08		738146.6			260.3			27.2		
08/06/25 17:50	27		9.4		2.08		742979.9			262			27.3		
08/06/25 17:51	27		9.3		2.08		744322.4			262.5			27.3		
08/06/25 17:52	27		9.2		2.08		740563.2			261.2			27.3		
08/06/25 17:53	27.1		9.3		2.2		741637.3			261.6			27.3		
08/06/25 17:54	27.2		9.4		2.31		743248.4			262.1			27.3		
08/06/25 17:55	27.4		9.4		2.31		740831.7			261.3			27.3		
08/06/25 17:56	27.4		9.4		2.31		741637.3			261.6			27.3		
08/06/25 17:57	27.4		9.3		2.31		742711.3			261.9			27.3		
08/06/25 17:58	27.5		9.1		2.31		738683.6			260.5			27.3		
08/06/25 17:59	27.6		9		2.31		742174.3			261.7			27.3		
08/06/25 18:00	27.6		9.1		2.43		739489.2			260.8			27.3		
08/06/25 18:01	27.7		9.3		2.43		741100.3			261.4			27.3		
08/06/25 18:02	27.5		9.4		2.43		740026.2			261			27.3		
08/06/25 18:03	27.5		9		2.31		740563.2			261.2			27.3		
08/06/25 18:04	27.5		9.1		2.31		739757.7			260.9			27.3		
08/06/25 18:05	27.5		9.2		2.43		740294.7			261.1			27.3		
08/06/25 18:06	27.6		9.4		2.43		740026.2			261			27.3		

	CT5_NOx_S	CR_Ppm_1M	CT5_NH3Slip	_Ppmvdc_1M	CT5_NOx_	Ppmvdc_1M	T5_ExhaustFlo	ow_LbPerHr_1	CT5_GasFlo	ow_kscfh_1M	CT5_Load	_MWe	∍_1M
Date/Time	Value	SI Mode	Value	SI Modc	Value	SI Mod	c Value	SI Mode	Value	SI Modc	Value		Mode
08/06/25 18:07	27.7		9.3		2.43		740294.7	200000	261.1		27.3		inout
08/06/25 18:08	27.8		9.3		2.43		742174.3		261.7		27.3		
08/06/25 18:09	27.7		9.2		2.31		743785.4		262.3		27.3		
08/06/25 18:10	27.7		9.2		2.31		741637.3		261.6	1	27.3		
08/06/25 18:11	27.6		9.3		2.43		738952.1		260.6		27.3		
08/06/25 18:12	27.6		9.2		2.43		740563.2		261.2		27.3		
08/06/25 18:13	27.6		9.2		2.43		739489.2		260.8		27.3		
08/06/25 18:14	27.5		9.2		2.31		741100.3		261.4		27.3		
08/06/25 18:15	27.5		9.2		2.31		738683.6		260.5		27.3		
08/06/25 18:16	27.6		9.1		2.31		739489.2		260.8		27.3		
08/06/25 18:17	27.5		9		2.31		740831.7		261.3		27.3		
08/06/25 18:18	27.4		9.1		2.31		740563.2		261.2		27.3		
08/06/25 18:19	27.3		9.1		2.31		739220.7		260.7		27.3		
08/06/25 18:20	26.8		9.1		2.2		739489.2		260.8		27.3		
08/06/25 18:21	26.2		8.8		2.08		737878.1		260.2		27.3		
08/06/25 18:22	26		8.8		2.08		742711.3		261.9		27.3		
08/06/25 18:23	25.9		8.8		2.08		739489.2		260.8		27.3		
08/06/25 18:24	26		8.7		2.08		736535.5		259.8		27.2		
08/06/25 18:25	26		8.8		2.2		736267		259.7		27.2		
08/06/25 18:26	26.2		8.5		2.08		738952.1		260.6		27.3		
08/06/25 18:27	26.2		8.3		2.08		738415.1		260.4		27.3		
08/06/25 18:28	26.1		8.3		2.08		739489.2		260.8		27.3		
08/06/25 18:29	26.2		7.9		2.24		754005.1		260.7		27.3		
08/06/25 18:30	26.2		8.3		2.2		738952.1		260.6		27.3		
08/06/25 18:31	26.3		7.9		2.24		757017.8		261.7		27.3		
08/06/25 18:32	26.3		7.9		2.24		750992.3		259.7		27.2		
08/06/25 18:33	26.3		8.2		2.2		740026.2		261		27.3		
08/06/25 18:34	26.3		8		2.2		738415.1		260.4		27.3		
08/06/25 18:35	26.3		8.3		2.31		738683.6		260.5		27.3		
08/06/25 18:36	26.2		8.3		2.31		738683.6		260.5		27.3		
08/06/25 18:37	26.2		8.3		2.31		738683.6		260.5		27.3		
08/06/25 18:38	26.3		8.3		2.31		738683.6		260.5		27.3		
08/06/25 18:39	26.4		8		2.31		738146.6		260.3		27.3		
08/06/25 18:40	26.5		8		2.31		740831.7		261.3		27.3		
08/06/25 18:41	26.4		8.3		2.43		740563.2		261.2		27.3		

	CT5_NOx_S	CR_Ppm_1M	CT5_NH3Slip	_Ppm	/dc_1M	CT5_NOx_I	Ppmvdo	c_1M	T5_ExhaustFlo	w_Lbl	PerHr_1N	CT5_GasFlo	w_ksc	fh_1M	CT5_Load	_MWe	_1M
Date/Time	Value	SI Mod	c Value	SI	Modc	Value	SI	Mode	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc
08/06/25 18:42	26.5		8.3			2.43			738415.1			260.4			27.3		
08/06/25 18:43	26.7		8.3			2.43			737609.6			260.1			27.3		
08/06/25 18:44	26.8		8.2			2.55			738683.6			260.5			27.3		
08/06/25 18:45	26.9		8.3			2.55			738146.6			260.3			27.3		
08/06/25 18:46	26.9		7.9			2.6			754005.1			260.7			27.3		
08/06/25 18:47	26.7		7.9			2.48			752361.8			260.1			27.3		
08/06/25 18:48	26.6		8.2			2.31			738683.6			260.5			27.3		
08/06/25 18:49	26.5		8.3			2.31			738683.6			260.5			27.3		
08/06/25 18:50	26.6		7.8			2.36			753457.3			260.5			27.3		
08/06/25 18:51	26.7		8.3			2.43			738146.6			260.3			27.3		
08/06/25 18:52	26.8		8.2			2.43			739489.2			260.8			27.3		
08/06/25 18:53	26.8		8.2			2.43			734924.4			259.2			27.3		
08/06/25 18:54	26.8		7.8			2.48			755374.5			261.2			27.3		
08/06/25 18:55	26.9		7.9			2.48			750718.4			259.6			27.3		
08/06/25 18:56	26.9		7.8			2.48			754005.1			260.7			27.3		
08/06/25 18:57	26.9		8.2			2.43			740831.7			261.3			27.3		
08/06/25 18:58	27		7.8			2.48			753183.4			260.4			27.3		
08/06/25 18:59	27		7.8			2.48			751266.2			259.8			27.3		
08/06/25 19:00	26.9		8			2.48			689094.3			238.3			24.2		
08/06/25 19:01	23.1		6.2			2.61			490445			145.8			12.3		
08/06/25 19:02	17.8		-0.2			3.44			261331.8			43.4			0.4		
08/06/25 19:03	13.9		-7			4.21			398111.2			38.5			0		
08/06/25 19:04	15.4		-2			3.37			262799.1			38.2			0		
08/06/25 19:05	17.2		-1.7			3.85			244710.2			38.9			0		
08/06/25 19:06	18.5		-1.9			4.62			244710.2			38.9			0		
08/06/25 19:07	17.8		13.5			5.9			62869			9.6			0		
08/06/25 19:08	4.4		-16			1.8			13694.2			0.1			0		
08/06/25 19:09	0.5		0			0.9			0			-0.1		1	0		
08/06/25 19:10	0.4		0			0.1			0			0.2		ļ	0		

Tuesday, August 12, 2025

Start Time: 08/06/2025 07:40:00 L1: 08/06/2025 08:07:36

End Time: 08/06/2025 19:10:00 L2: 08/06/2025 18:57:34.800, (L2 - L1): 10:49:58.8

	G	Point Name	Historian	Processing	Description	End Value	Units	S	Low Sc	High Sc	Left Curso	Right Cur	Difference
1	V	(A) A1MBL30CT005-XQ01.UNIT1@NET0	Auto Historian	Actual	TEMP AMBIENT AIR (T0)	96.00	F	V	-49	176	74.00	95.00	21.00
2	V	(A) A2MBL30CT005-XQ01.UNIT1@NET0	Auto Historian	Actual	TEMP AMBIENT AIR (T0)	95.00	F	V	-49	176	72.00	96.00	24.00

Date Time	A1MBL30CT00	A2MBL30CT00
08/06/2025 19:03:06	96.00	95.00
08/06/2025 18:56:12	95.00	96.00
08/06/2025 18:49:18	96.00	96.00
08/06/2025 18:42:24	96.00	96.00
08/06/2025 18:35:30	95.00	97.00
08/06/2025 18:28:36	94.00	97.00
08/06/2025 18:21:42	95.00	95.00
08/06/2025 18:14:48	97.00	98.00
08/06/2025 18:07:54	95.00	95.00
08/06/2025 18:01:00	96.00	95.00
08/06/2025 17:54:06	95.00	95.00
08/06/2025 17:47:12	94.00	97.00
08/06/2025 17:40:18	96.00	96.00
08/06/2025 17:33:24	95.00	95.00
08/06/2025 17:26:30	93.00	93.00
08/06/2025 17:19:36	94.00	94.00
08/06/2025 17:12:42	93.00	94.00
08/06/2025 17:05:48	93.00	96.00
08/06/2025 16:58:54	92.00	94.00
08/06/2025 16:52:00	92.00	94.00
08/06/2025 16:45:06	92.00	93.00

Start Time: 08/06/2025 07:40:00 L1: 08/06/2025 08:07:36

End Time: 08/06/2025 19:10:00 L2: 08/06/2025 18:57:34.800, (L2 - L1): 10:49:58.8

Date Time	A1MBL30CT00	A2MBL30CT00
08/06/2025 16:38:12	92.00	94.00
08/06/2025 16:31:18	91.00	91.00
08/06/2025 16:24:24	92.00	92.00
08/06/2025 16:17:30	92.00	92.00
08/06/2025 16:10:36	92.00	91.00
08/06/2025 16:03:42	91.00	93.00
08/06/2025 15:56:48	92.00	91.00
08/06/2025 15:49:54	91.00	91.00
08/06/2025 15:43:00	90.00	90.00
08/06/2025 15:36:06	88.00	89.00
08/06/2025 15:29:12	89.00	89.00
08/06/2025 15:22:18	89.00	90.00
08/06/2025 15:15:24	88.00	89.00
08/06/2025 15:08:30	90.00	89.00
08/06/2025 15:01:36	90.00	90.00
08/06/2025 14:54:42	90.00	90.00
08/06/2025 14:47:48	90.00	90.00
08/06/2025 14:40:54	90.00	90.00
08/06/2025 14:34:00	91.00	91.00
08/06/2025 14:27:06	91.00	91.00
08/06/2025 14:20:12	91.00	91.00
08/06/2025 14:13:18	90.00	91.00
08/06/2025 14:06:24	90.00	90.00
08/06/2025 13:59:30	90.00	90.00
08/06/2025 13:52:36	92.00	91.00

Start Time: 08/06/2025 07:40:00

L1:08/06/2025 08:07:36

End Time: 08/06/2025 19:10:00

L2: 08/06/2025 18:57:34.800, (L2 - L1): 10:49:58.8

Date Time	A1MBL30CT00	A2MBL30CT00
08/06/2025 13:45:42	91.00	91.00
08/06/2025 13:38:48	90.00	89.00
08/06/2025 13:31:54	90.00	88.00
08/06/2025 13:25:00	89.00	91.00
08/06/2025 13:18:06	89.00	90.00
08/06/2025 13:11:12	90.00	89.00
08/06/2025 13:04:18	88.00	87.00
08/06/2025 12:57:24	88.00	88.00
08/06/2025 12:50:30	87.00	87.00
08/06/2025 12:43:36	87.00	87.00
08/06/2025 12:36:42	87.00	87.00
08/06/2025 12:29:48	87.00	86.00
08/06/2025 12:22:54	86.00	86.00
08/06/2025 12:16:00	86.00	86.00
08/06/2025 12:09:06	85.00	85.00
08/06/2025 12:02:12	86.00	87.00
08/06/2025 11:55:18	85.00	84.00
08/06/2025 11:48:24	85.00	85.00
08/06/2025 11:41:30	83.00	84.00
08/06/2025 11:34:36	85.00	85.00
08/06/2025 11:27:42	85.00	83.00
08/06/2025 11:20:48	83.00	82.00
08/06/2025 11:13:54	83.00	83.00
08/06/2025 11:07:00	83.00	85.00
08/06/2025 11:00:06	81.00	81.00

Start Time: 08/06/2025 07:40:00 L1: 08/06/2025 08:07:36

End Time: 08/06/2025 19:10:00 L2: 08/06/2025 18:57:34.800, (L2 - L1): 10:49:58.8

Date Time	A1MBL30CT00	A2MBL30CT00
08/06/2025 10:53:12	81.00	81.00
08/06/2025 10:46:18	80.00	80.00
08/06/2025 10:39:24	80.00	80.00
08/06/2025 10:32:30	80.00	81.00
08/06/2025 10:25:36	81.00	79.00
08/06/2025 10:18:42	80.00	80.00
08/06/2025 10:11:48	79.00	79.00
08/06/2025 10:04:54	80.00	78.00
08/06/2025 09:58:00	78.00	79.00
08/06/2025 09:51:06	77.00	78.00
08/06/2025 09:44:12	78.00	78.00
08/06/2025 09:37:18	78.00	77.00
08/06/2025 09:30:24	77.00	78.00
08/06/2025 09:23:30	76.00	77.00
08/06/2025 09:16:36	77.00	77.00
08/06/2025 09:09:42	76.00	77.00
08/06/2025 09:02:48	74.00	76.00
08/06/2025 08:55:54	74.00	77.00
08/06/2025 08:49:00	73.00	75.00
08/06/2025 08:42:06	74.00	75.00
08/06/2025 08:35:12	73.00	78.00
08/06/2025 08:28:18	73.00	77.00
08/06/2025 08:21:24	75.00	76.00
08/06/2025 08:14:30	73.00	76.00
08/06/2025 08:07:36	74.00	72.00

Start Time: 08/06/2025 07:40:00 L1: 08/06/2025 08:07:36

Date Time	A1MBL30CT00	A2MBL30CT00
08/06/2025 08:00:42	71.00	72.00
08/06/2025 07:53:48	73.00	73.00
08/06/2025 07:46:54	72.00	71.00
08/06/2025 07:40:00	72.00	71.00

Year

Non-Compliance Event Number



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	Addı	ess	5120 PH	HILLIP ROAD	, ROSEVILL	E, CA.			
2.	Title V Source Status Major Yes ⊠ No □	Synthe	tic Min	or Yes 🗌	No 🗵					
3.	For Title V Sources, is the Non-Compliance Event the Re Rule 507, Section 402.2(I)	sult of	an Em	ergency ι	ınder Distric	t Yes 🗌	No 🗵			
4.	Emission Exceedances NOx ⊠ SOx □ PM □] VO	c 🗆	со 🗆	Opacity	None	check all that apply			
5.	5. CEMS / COMS / CMS Breakdown Yes No 🖂									
6.	Detection of Non-Compliance Event Date 8/7/25		Time	19:0	0	☐ AM ⊠ P	M			
7.	Start of Non-Compliance Event Date 8/7/25		Time	18:0	0	☐ AM ⊠ P	M 🔲 Not known			
8.	8. Violation Permit No. REPR-20-03 Condition No. 34(b) Rule Section									
9.	Unit / Equipment Involved CT5									
10.	Description / Cause of Non-Compliance Event additional information attached NH3 in	jection	tuning	g slow, ca	libration at e	nd of hour				
11.	Immediate Corrective Actions Lowered NOX setpoint		□a	dditional inf	ormation attach	ned				
12.	Was the Non-Compliance Event an Emission Violation or	Monito	oring E	quipmen	t Failure or N	lalfunction `	Yes ☐ No 🏻			
	If yes, do you Request that the Violation, Failure or Malfu Breakdown Pursuant to District Rule 404	ınction	be Shi	elded fro	m Enforceme	ent Action a	s an Upset /			
	Yes No Not Able to Determine at this Tir	ne 🛚			nplete and sub orm with Part I	mit the Upset /	Breakdown			
13.	Submitted By Eddje Vasquez			Telepho	one (916	746 - 1683				
	Signature	Date	8/8/2	5 Tir	ne 1530	□ A	М ⊠ РМ			

NON-COMPLIANCE EVENT NOTIFICATION FORM - PART II

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

14.	End of Non-Compliance Eve	nt D	ate 8/7/25	Time	1900	☐ AM ,	₽ PM
15.	Duration of Non-Compliance	Event H	ours	M	linutes 💍		
16.	Excess Emissions Estimates	s NOx 2	-6ppmude	SOx		PM	
	VOC CC)	Opacit	y %, for	minu	tes Othe	r
17.	Variance in Effect	Yes [☐ Variance #		No 🗵		
18.	Corrective and Preventative Future Events X	Actions Take additional inform	. ,	ze Emissions	× (I	o) Correct Event	(c) Prevent
19.	If Not Able to Determine in It Equipment Failure or Malfun If yes, do you Request that the Breakdown Under District Ro	ction he Violation, I		-			,-
	Yes ☐ No ☑ Ⅱ	f "Yes", complete	e and submit the	Upset / Breakdo	wn Checklist F	orm if not previously	submitted with Part I
20.	Submitted By NATHAN R	1BORDY			Teleph	one (916) 746	- 1673
	I certify under penalty of law that I information and belief formed after Signature			nts and information		ment are true, accura	

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	Yea	ar		 	
2	0		-		

UPSET / BREAKDOWN AND EMERGENCY CHECKLIST

Non-Compliance Event Number

	Company Na	ame			Address	
	Detection of	Non-	Compliance Event	Date	Time	☐ AM ☐ PM
р	ursuant to Ru	ıle 40	4, and/or an "Emerge	ncy" Event pu	ermining whether an event is a rsuant to Rule 507. To be cons uestions must be answered with	idered as a legitimate Upset
Y	<u>'es No</u>					
		1.			oreakdown event have been ith minimizing emissions.	designed, maintained, and
		2.	The amount and dura	ation of emiss	ions as a result of the event hav	ve been minimized.
		3.			pattern of previous breakdown dicative of inadequate equip	
		4.	The event is not the (i.e., the facility is be	•	rator error, negligence, careles perated).	sness, or willful misconduct
		5.	The event is not the	result of impro	per equipment design.	
		6.	The event is not the	result of impro	per preventative maintenance of	of equipment.
		7.	The event is the result of the operator.	ılt of a sudder	, unavoidable breakdown of eq	uipment, beyond the control
		8.			reseen or avoided or planned for erating and maintenance practio	
		9.	The event has not re	sulted in a nui	sance.	
		10.	The event is not the	result of the d	isregard of air pollution rules or	regulations.
		11.			been completed and submitter com the end of the Non-Complia	
		12.	Immediate corrective on the Part I Non-Co		been taken to minimize emissiont Notification Form.	ons, as described in Item 11
0					or this facility, or his/her duly design e statements and information in thi	
S	ignature					
	/ Breakdown" air pollution or restriction pre	Even contro escrib	t under District Rule 404 Il equipment or related ed by the District Rules	. A breakdown operating equi and Regulation	tion because the Non-Compliance condition means an unforeseeable pment which causes a violation of ons, or by State law, or 2) any ir he result of neglect or disregard of	failure or malfunction of 1) any of any emission limitations or n-stack continuous monitoring

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

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To:

Bruce Springsteen, Manager, Compliance and Enforcement, PCAPCD

Heather Selvester, Air Quality Specialist, PCAPCD

From:

Nathan Ribordy, Power Generation Superintendent

Date:

August 13, 2025

Subject:

Non-Compliance Event Notification #2025-016 PART II

This memo provides supplemental details to the Non-Compliance Event Notification #2025-016 submitted on August 8, 2025, regarding an incident involving RPEAK Combustion Turbine #5 (CT5).

Incident Summary:

Startup Time: 8/7/25 ~1745

Full Load Achieved: 18:05

Shutdown Time: 20:03

Event: NOx ppmvdc 1-hour exceedance for the 1800 hour following CEMS calibration.

- **Response:** Following calibration the controller was attempting to drive NOx down to 2.3ppmvdc after lowering the NOx setpoint.
- Investigation: It was identified that the control room operator (CRO) initiated the CEMS calibration prior to the system reaching steady state following start up. The exceedance is a result of human error.

Follow-Up Actions:

Training was conducted during the division's safety meeting on 8/12/25 regarding emissions control and the need to reach steady state operations prior to commencing CEMS calibrations.

A review of our operating profiles verified that our "minimum on time" for the RPEAK engines are two hours, allowing sufficient time for the engine to reach steady state prior to commencing a calibration.

Respectfully,

Nathan Ribordy, P.E. (916) 746-1673

nribordy@roseville.ca.us

NOx Ppmvdc 1-Hour Block Excess Emissions

CT5

From:

08/07/2025 00:00 **To:** 08/07/2025 23:59

Facility Name:

ROSEVILLE ENERGY

Location:

Roseville, CA

Tag Name:

CT5_NOx_Norm_Ppmvdc_1H

Total Operating Time: 4.00 Hour(s)

No Exclusions Allowed

Non-Operating Time: 20.00 Hour(s) Report Time: 24.00 Hour(s)

Generated: 08/08/2025 01:23

Inc No	Start Time	End Time	Duration in Hour(s)	Tag Value	Limit	Reason Code	Action Code
1	08/07/25 18:00	08/07/25 18:59	1	2.6	2.5	23 - CALIBRATION COMPLETE AT END OF HOUR	23 - LOWERED NOX SETPOINT

Total Operating Time:

Total Duration (Online only):

4.00 Hour(s)

1.00 Hour(s)

25.00 %

75.00 %

Time in exceedance as a percentage of operating time:

Time in compliance as a percentage of operating time:

Report Code	Туре	Text	Duration	Duration Percent
23	Reason	CALIBRATION COMPLETE AT END OF HOUR	1	100.00
23	Action	LOWERED NOX SETPOINT	1	100.00

Sample Spreadsheet Listing

	CT5_CO_F	pmvdc_1M	CT5_NOx_	Ppmvdc_1M	T5_ExhaustFlo	w_LbPerHr_1N	CT5_GasFid	ow_kscfh_1M	CT5_Load	_MWe_1M	CT5_NOx_S	USD_L	bs_1M
Date/Time	Value	SI Modc	Value	SI Mod	c Value	SI Modc	Value	SI Modc	Value	SI Modc	Value	SI	Modc
08/07/25 18:00	7.6		29.26		238827.6		41.3		0		0.19		
08/07/25 18:01	7.3		27.14		327018.5		56.5		2		0.29		
08/07/25 18:02	4.4		33.6		672919.9		167.5		15.1		0.66		
08/07/25 18:03	1.7		29.91		622852		249.8		25.2		1.14		
08/07/25 18:04	0.7		14.12		589060		268.8		27.4		1.39		
08/07/25 18:05	0.5		0.88		592327.1		274.4		28.1		1.41		
08/07/25 18:06	0.5		1.06		593144.7		274.8		28.3		1.43		
08/07/25 18:07	0.5		1.5		592327.1		274.4		28.3		0		
08/07/25 18:08	0.4		2.23		599019.4		273.4		28.3		0		
08/07/25 18:09	0.4		3.18		626674.7		273		28.3		0		
08/07/25 18:10	0.4		3.66		678101.2		272		28.3		0		
08/07/25 18:11	0.4		3.11		715088.5		272		28.3		0		
08/07/25 18:12	0.5		2.19		728077.3		271.9		28.3		0		
08/07/25 18:13	0.6		1.89		739489.2		271		28.3		0		
08/07/25 18:14	0.6		2.12		739230.8		270.9		28.3		0		
08/07/25 18:15	0.6		2.34		737680.5		270.4		28.3		0		
08/07/25 18:16	0.6		2.45		739489.2		271		28.3		0		
08/07/25 18:17	0.6		2.34		737422.1		270.3		28.3		0		
08/07/25 18:18	0.6		2.45		737163.7		270.2		28.3		0		
08/07/25 18:19	0.6		2.56		737680.5		270.4		28.3		0		
08/07/25 18:20	0.6		2.56		736388.6		269.9		28.3		0		
08/07/25 18:21	0.6		2.45		737163.7		270.2		28.3		0		
08/07/25 18:22	56.7	X	2.88	X	908597.2	Χ	270.2		28.3		0		
08/07/25 18:23	37	X	0	X	0	Χ	270.2		28.3		0		
08/07/25 18:24	18.5	X	-0.2	X	0	Χ	269.6		28.3		0		
08/07/25 18:25	18.4	X	-0.2	Χ	0	Χ	269.9		28.3		0		
08/07/25 18:26	18.4	X	-0.2	Χ	0	Χ	269.7		28.3		0		
08/07/25 18:27	15	X	0.09	X	619066.8	Χ	269.7		28.3		0		
08/07/25 18:28	0.4	X	2.46	Χ	186870.7	Χ	270.1		28.3		0		
08/07/25 18:29	-0.1	Χ	2.63	Х	186281	Χ	269.2		28.3		0		
08/07/25 18:30	-0.1	Χ	2.65	Χ	186805.2	Χ	270		28.3		0		
08/07/25 18:31	-0.1	X	2.65	Х	186346.6	Х	269.3		28.3		0		

Friday, Augus' ?025

	CT5_CO_I	Ppmvdc_1M	CT5_NOx	_Ppmvd	dc_1M	T5_ExhaustFlo	w_Lb	PerHr_1N	CT5_GasFlo	w_ksc	fh_1M	CT5_Load	_MW	e_1M	CT5_NOx_S	USD_	Lbs_1M
Date/Time	Value	SI Mo	dc Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Mode
08/07/25 18:32	-0.1	Х	2.68	Х		186281	Х		269.2			28.3			0		
08/07/25 18:33	-0.1	Х	92.14	Х		186346.6	Х		269.3			28.3			0		
08/07/25 18:34	-0.1	X	142.81	Х		186477.6	Х		269.5			28.3			0		
08/07/25 18:35	-0.1	Χ	142.79	Х		186412.1	Х		269.4			28.3			0		
08/07/25 18:36	-0.1	X	142.79	X		186608.6	Х		269.7			28.3			0		
08/07/25 18:37	37	X	137.08	Х		186412.1	Х		269.4			28.3			0		
08/07/25 18:38	286.1	X	7.54	Х		186281	Х		269.2			28.3			0		
08/07/25 18:39	304.6	Х	0.31	Х		186281	Х		269.2			28.3			0		
08/07/25 18:40	304.6	X	0.25	Х		186215.5	Х		269.1			28.3			0		
08/07/25 18:41	304.6	Х	0.17	Х		186215.5	Х		269.1			28.3			0		
08/07/25 18:42	406	X	0.23	Х		306449.1	Х		269.1			28.3			0		
08/07/25 18:43	68.6	X	1.2	Х		793986.7	Х		269			28.3			0		
08/07/25 18:44	1	Х	2.5	Х		748443.1	Х		269.1			28.3			0		
08/07/25 18:45	0.7	Х	3.4	Х		747916.4	Х		268.9			28.3			0		
08/07/25 18:46	0.7	X	3.29	Х		747916.4	X		268.9			28.3			0		
08/07/25 18:47	0.7		3.29			748443.1			269.1			28.3			0		
08/07/25 18:48	0.7		3.06			747653			268.8			28.3			0		
08/07/25 18:49	0.7		2.84			747126.3			268.7			28.3			0		
08/07/25 18:50	0.7		2.61			748706.4			269.2			28.3			0		
08/07/25 18:51	0.7		2.61			747916.4			268.9			28.3			0		
08/07/25 18:52	0.7		2.61			747916.4			268.9			28.3			0		
08/07/25 18:53	0.7		2.61			748179.7			269			28.3			0		
08/07/25 18:54	0.7		2.5			747653			268.8			28.3			0		
08/07/25 18:55	0.7		2.5			747126.3			268.7			28.3			0		
08/07/25 18:56	0.7		2.5			747653			268.8			28.3			0		
08/07/25 18:57	0.7		2.5			747653			268.8			28.3			0		
08/07/25 18:58	0.7		2.5			746599.6			268.5			28.3			0		
08/07/25 18:59	0.7		2.5			749233.1			269.4			28.3			0		
08/07/25 19:00	0.7		2.5			745809.6			268.2			28.3			0		
08/07/25 19:01	0.7		2.5			744492.8			267.7			28.2			0		
08/07/25 19:02	0.7		2.5			743966.1			267.5			28.2			0		
08/07/25 19:03	0.7		2.38			745809.6			268.2			28.3			0		
08/07/25 19:04	0.7		2.27			744492.8			267.7			28.2			0		
08/07/25 19:05	0.7		2.27			748179.7			269			28.3			0		
08/07/25 19:06	0.7		2.27			746336.3			268.4			28.3			0		

Friday, Augus' ?025

	CT5_CO_F	pmvdc_1M	CT5_NOx_	Ppmvdc	_1M	T5_ExhaustFlo	w_LbF	PerHr_1N	CT5_GasFlo	ow_ksc	fh_1M	CT5_Load	_MWe	_1M	CT5_NOx_S	USD_	Lbs_1M
Date/Time	Value	SI Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc
08/07/25 19:07	0.7		2.38			743439.4			267.3			28.2			0		
08/07/25 19:08	0.7		2.38			744756.2			267.8			28.2			0		
08/07/25 19:09	0.7		2.38			748706.4			269.2			28.3			0		
08/07/25 19:10	0.7		2.38			746336.3			268.4			28.3			0		
08/07/25 19:11	0.7		2.38			746072.9			268.3			28.3			0		
08/07/25 19:12	0.7	j	2.38			746599.6			268.5			28.3			0		
08/07/25 19:13	0.7		2.38			746072.9			268.3			28.3			0		
08/07/25 19:14	0.7		2.27			746863			268.6			28.3			0		
08/07/25 19:15	0.7		2.27			746863			268.6			28.3			0		
08/07/25 19:16	0.7		2.27			746599.6			268.5			28.3			0		
08/07/25 19:17	0.7		2.16			748443.1			269.1			28.3			0		
08/07/25 19:18	8.0		2.16			746336.3			268.4			28.3			0		
08/07/25 19:19	0.8		2.16			746863			268.6			28.3			0		
08/07/25 19:20	0.8		2.16			747653			268.8			28.3			0		
08/07/25 19:21	0.8		2.16			746072.9			268.3			28.3			0		
08/07/25 19:22	0.7		2.16			746072.9			268.3			28.3			0		
08/07/25 19:23	0.7		2.16			746072.9			268.3			28.3			0		
08/07/25 19:24	0.7		2.27			746072.9			268.3			28.3			0		
08/07/25 19:25	0.7		2.27			746599.6			268.5			28.3			0		
08/07/25 19:26	0.7		2.38			746072.9			268.3			28.3			0		
08/07/25 19:27	0.7		2.38			746072.9			268.3			28.3			0		
08/07/25 19:28	0.7		2.38			746072.9			268.3			28.3			0		
08/07/25 19:29	0.7		2.27			746336.3			268.4			28.3			0		
08/07/25 19:30	0.7		2.27			746072.9			268.3			28.3			0		
08/07/25 19:31	0.7		2.38			745809.6			268.2			28.3			0		
08/07/25 19:32	0.7		2.38			746336.3			268.4			28.3			0		
08/07/25 19:33	0.7		2.27			745809.6			268.2			28.3			0		
08/07/25 19:34	0.7		2.27			745282.9			268			28.3			0		
08/07/25 19:35	0.7		2.27			744756.2			267.8			28.3			0		
08/07/25 19:36	0.7		2.27			746336.3			268.4			28.3			0		
08/07/25 19:37	0.7		2.16			745809.6			268.2			28.3			0		
08/07/25 19:38	0.7		2.16			746072.9			268.3			28.3			0		
08/07/25 19:39	0.7		2.04			745809.6			268.2			28.3			0		
08/07/25 19:40	0.8		2.04			745019.5			267.9			28.3			0		
08/07/25 19:41	0.7		2.04			745546.2			268.1			28.3			0		

Friday, Augus' 7025

	CT5_CO_F	Ppmvdc_1M	CT5_NOx_F	pmvdc_1M	T5_ExhaustFlo	ow_LbPe	erHr_1N	CT5_GasFlo	ow_ksc	fh_1M	CT5_Load	_MWe	_1M	CT5_NOx_S	USD_I	_bs_1M
Date/Time	Value	SI Modc	Value	SI Mode	Value	SI I	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc
08/07/25 19:42	0.8		2.04		745282.9			268			28.3			0		
08/07/25 19:43	0.8		2.04		746072.9			268.3			28.3			0		
08/07/25 19:44	0.8		2.16		745282.9			268			28.3			0		
08/07/25 19:45	0.8		2.16		746599.6			268.5			28.3			0		
08/07/25 19:46	0.7		2.16		745282.9			268			28.3			0		
08/07/25 19:47	0.7		2.04		745809.6			268.2			28.3			0		
08/07/25 19:48	0.7		2.04		744492.8			267.7			28.3			0		
08/07/25 19:49	0.7		2.16		746599.6			268.5			28.3			0		
08/07/25 19:50	0.7		2.16		745546.2			268.1			28.3			0		
08/07/25 19:51	0.7		2.27		745809.6			268.2			28.3			0		
08/07/25 19:52	0.7		2.27		745282.9			268			28.3			0		
08/07/25 19:53	0.8		2.27		745546.2			268.1			28.3			0		
08/07/25 19:54	8.0		2.27		746072.9			268.3			28.3			0		
08/07/25 19:55	0.7		2.27		745019.5			267.9			28.3			0		
08/07/25 19:56	0.7		2.27		745809.6			268.2			28.3			0		
08/07/25 19:57	0.7		2.16		744756.2			267.8			28.3			0		
08/07/25 19:58	0.8		2.04		745546.2		1 1 2 2 1	268.1			28.3			0		
08/07/25 19:59	0.8		2.04		745282.9			268			28.3			0		
08/07/25 20:00	8.0		2.04		729218.5			262.2			27.3			0.03		

Year

Non-Compliance Event Number

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

Placer County

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 □ S	ynthetic Minor Yes ☐ No 🏻
3.	For Title V Sources, is the Non-Compliance Event the Res Rule 507, Section 402.2(I)	ult of an Emergency under District 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 8/8/25	Time 19:00 ☐ AM ⊠ PM
7.	Start of Non-Compliance Event Date 8/8/25	Time 1800 ☐ AM ☐ PM ☐ Not known
8.	Violation Permit No. REPR-20-03 Condition No. 43	Rule Section
9.	Unit / Equipment Involved CT5	
10.	Description / Cause of Non-Compliance Event NH3 Slip	o - 1 Hour additional information attached
11.	Immediate Corrective Actions Raised NOx Setpoint	☑ additional information attached
12.	Was the Non-Compliance Event an Emission Violation or I	Monitoring Equipment Failure or Malfunction Yes 🗌 No 🗵
	If yes, do you Request that the Violation, Failure or Malfun Breakdown Pursuant to District Rule 404	ction be Shielded from Enforcement Action as an Upset /
	Yes ☐ No ☐ Not Able to Determine at this Time	e If "Yes", complete and submit the Upset / Breakdown Checklist Form with Part I
13.	Submitted By NATHAN RIBORDY	Telephone (916) 746 - 1673
	Signature / Conference Confer	Date 8/11/25 Time 14:45 ☐ 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	8/8/25	Time	2000		☐ AM ☑ PM	
15.	Duration of Non-Compliance Event	Hours	2	N	linutes O			
16.	Excess Emissions Estimates NOx			SOx			PM	
	VOC CO		Opacity	%, for	minu	utes	Other NH3	fanual
17.	Variance in Effect Ye	es 🗌 V	ariance#		No	V		
18.	Corrective and Preventative Actions Ta Future Events			issions	d	b) Correc	t Event	(C) Prevent
19.	If Not Able to Determine in Item 12 of P Equipment Failure or Malfunction If yes, do you Request that the Violatio Breakdown Under District Rule 404			•				
	Yes ☐ No ☑ If "Yes", comp	lete and	submit the Upset	/ Breakdo	wn Checklist	Form if not p	oreviously submitte	ed with Part I
20.	Submitted By NATHAN RIBERRY				Teleph	none (916) 746-1673	
	I certify under penalty of law that I am the responding information and belief formed after reasonable Signature			information	on in this doc			complete.

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	Ye	ar					
2	0	2	2	-	0	-	7

UPSET / BREAKDOWN AND EMERGENCY CHECKLIST

Non-Compliance Event Number

	Company Na	ame				
	Detection of	Non	-Compliance Event	Date	Time	☐ AM ☐ PM
р	ursuant to Ru	ıle 40	04, and/or an "Emerge	ency" Event pursi		an "Upset/Breakdown" Event nsidered as a legitimate Upset ith a "Yes" checkmark.
<u>Y</u>	es No					
		1.			akdown event have been minimizing emissions.	designed, maintained, and
		2.	The amount and dur	ation of emission	s as a result of the event ha	ave been minimized.
		3.				ns of the same equipment for pment design, operation, or
		4.	The event is not the (i.e., the facility is be			ssness, or willful misconduct
		5.	The event is not the	result of imprope	r equipment design.	
		6.	The event is not the	result of imprope	r preventative maintenance	of equipment.
		7.	The event is the rest of the operator.	ult of a sudden, u	navoidable breakdown of e	quipment, beyond the control
		8.			een or avoided or planned ting and maintenance pract	for, and could not have been ices.
		9.	The event has not re	sulted in a nuisa	nce.	
		10.	The event is not the	result of the disre	egard of air pollution rules o	r regulations.
		11.			een completed and submitt the end of the Non-Compl	ted to the District in a timely iance Event.
		12.	Immediate corrective on the Part I Non-Co			ions, as described in Item 11
on						nated representative, and based nis document are true, accurate,
Si	gnature					
	/ Breakdown" I air pollution c restriction pre-	Eventontro	tunder District Rule 404 I equipment or related ed by the District Rules	. A breakdown con operating equipment and Regulations	dition means an unforeseeable ent which causes a violation , or by State law, or 2) any	e Event is the result of an "Upset e failure or malfunction of 1) any of any emission limitations or in-stack continuous monitoring f any air pollution control law or

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 ultimately determine that the Non-Compliance Event was not the result of a legitimate Upset / Breakdown event and may ultimately determine that the Non-Compliance Event was not the result of a legitimate Upset / Breakdown event and may ultimately determine that the Possibility of the Event to the maximum degree possible; a

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To:

Bruce Springsteen, Manager, Compliance and Enforcement, PCAPCD

Heather Selvester, Air Quality Specialist, PCAPCD

From:

Nathan Ribordy, Power Generation Superintendent

Date:

August 14, 2025

Subject:

Non-Compliance Event Notification #2025-017 PART II

This memo provides supplemental details to the Non-Compliance Event Notification #2025-017 submitted on August 11, 2025, regarding an incident involving RPEAK Combustion Turbine #5 (CT5) on August 8, 2025.

Incident Summary:

Fuel Flow Start: 17:51

Full Load Achieved: 17:59

Fuel Flow Stop: 20:06

Event: Excess slip recorded for the 1800 hour at 10.1ppmvdc and 1900 hour at 10.3ppmvdc.

- Response: After the engine reached base load it was noted that the NOx setpoint of 2.2ppm in the ammonia injection controller was not driving down NOx as anticipated. The setpoint was lowered to 2.0ppm to drive NOx down. After NOx was in compliance the setpoint was returned to 2.2ppm. The changing of the NOx setpoint resulted in more ammonia use and accompanying slip for the 1800 hour. It was anticipated by operations that the system had reached steady state and would control for the second hour, but the system was unable to maintain setpoint without causing excessive slip for the 1900 hour at 10.3ppmvdc.
- Investigation: It was noted that the inlet NOx from the engine was higher than what was expected going into the catalyst, like the event on August 6, 2025 (NCE 2015-015). Evaluation of the day's CEMS data showed a steady increase in SCR inlet NOx, above the designed 25ppm. Increased slip with an elevated inlet NOx is indicative of the emissions control equipment attempting to correct for the high inlet NOx.

Review of the SCR design data (Braden-Americas DWG 25101-101 Rev E) reveals the catalyst and associated equipment are designed for 25ppmvdc NOx (Figure 1). The inlet NOx from the engine at approximately 27ppmvdc was operating beyond the design capability of the catalyst.

FLOW CONDITIONS:

- MASS FLOW RATE: 823,365 PPH - NORMAL AVERAGE EXHAUST TEMPERATURE 850°F

EMISSIONS AT STACK OUTLET:

- NOX: DESIGN 25 TO 2.5 PPMVD @ 15% OXYGEN

- CO: DESIGN 78.3 TO 2.5 PPMVD @ 15% OXYGEN - NH3 SLIP: 5 PPMVD @ 15% OXYGEN

SCR CATALYST DESIGN FOR 20,000 OPERATING HOURS OR 39 MONTHS

FROM SHIPMENT

- CO CATALYST DESIGN FOR 20,000 OPERATING HOURS NOT TO EXCEED 60 MONTHS OF OPERATION OR 66 MONTHS FROM SHIPMENT - 20 MINUTES TO EMISSION COMPLIANCE

Figure 1

Engine NOx is controlled by water injection. Water injection rates are derived from a table in the control system. Fuel flow determines the water injection rate (in pounds per hour) from what appears to be an uncorrected ACFM fuel flow. Based on the investigation and available data water injection ratios that were previously tuned were not sufficient at higher ambient temperatures.

Follow-Up Actions:

Training was conducted during the division's safety meeting on 8/12/25 regarding emissions control and the need to reduce engine load if other troubleshooting activities do not resolve the issue.

Test runs were scheduled for CT5 on 8/12/25 to adjust the water injection curves while ambient temperatures better reflected summertime operations to reduce demand on the emissions control equipment. It should be noted that operating the SCR to produce stack NOx values lower than the designed 2.5ppmvdc stresses the system and likely contributes to ammonia slip.

Additional investigation is being made to determine if the fuel flow errors used in the water injection control logic can be corrected. The existing plan is to develop optimum water to fuel curves for winter and summer operations. Tuning changes may need to be implemented prior to season changes to minimize NOx from the engine while not increasing engine wear from excessive water use.

Respectfully,

Nathan Ribordy, P.E. (916) 746-1673

nribordy@roseville.ca.us

NH3 Slip Ppmvdc 1-Hour Block Excess Emissions

CT5

Facility Name: From: 08/08/2025 00:00 **To:** 08/08/2025 20:21 ROSEVILLE ENERGY

Generated: 08/08/2025 20:22 Location: Roseville, CA

Tag Name:

CT5_NH3Slip_Ppmvdc_1H

Total Operating Time: 3.00 Hour(s)

No Exclusions Allowed

Non-Operating Time: 18.00 Hour(s) Report Time: 21.00 Hour(s)

Inc No	Start Time	End Time	Duration in Hour(s)	Tag Value	Limit	Reason Code	Action Code
1	08/08/25 18:00	08/08/25 18:59	1	10.1	10.0		
2	08/08/25 19:00	08/08/25 19:59	1	10.3	10.0		

Total Operating Time:

Total Duration (Online only):

3.00 Hour(s)

Time in exceedance as a percentage of operating time:

2.00 Hour(s)

66.67 %

Time in compliance as a percentage of operating time:

33.33 %

Sample Spreadsheet Listing

	CT5_NOx_S	CR_Ppm_1M	CT5_NOx_	Ppmvdc_1	М	CT5_NH3Slip	_Ppmv	dc_1M	CT5_GasFlo	w_ksc	fh_1M	CT5_Load	_MWe	_1M	T5_ExhaustFlo	ow_Lb	PerHr_1N
Date/Time	Value	SI Modc	Value	SI M	odc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc
08/08/25 17:45	0		-0.2			0			0.3			0			0		
08/08/25 17:46	0		-0.2			0			0.2			0			0		
08/08/25 17:47	0		-0.2			0			0.4			0			0		
08/08/25 17:48	0		-0.2			0			0.3			0			0		
08/08/25 17:49	0		-0.2			0			0.3			0			0		
08/08/25 17:50	0		-0.2			0			0			0			0		
08/08/25 17:51	0		-0.2			0			1.3			0			0		
08/08/25 17:52	2.7		-1.48			0			27.5			0			992832.7		
08/08/25 17:53	12.7		18.5			0			34.3			0			225332.6		
08/08/25 17:54	15.3		25.81			0			42.6			0			256767.1		
08/08/25 17:55	18.5		30.92			0			45			0.5			260190.6		
08/08/25 17:56	26.5		28.93			0			143.4			11.9			668809.2		
08/08/25 17:57	32.9		28.32			2			236.4			23.5			621469.7		
08/08/25 17:58	31.6		22.06			16.5			259.6			26.4			577475.7		
08/08/25 17:59	31.1		1.16			12.8			264.6			27.1			579723		
08/08/25 18:00	30.6		1.16			13.1			264.3			27.2			579100.5		
08/08/25 18:01	31		1.52			13.1			264			27.3			578478.1		
08/08/25 18:02	31.7		2.41			13.1			264.4			27.4			579308		
08/08/25 18:03	32		3.5			12.4			263.5			27.3			595485.6		
08/08/25 18:04	31.6		4.72			11.1			263.2			27.3			634271.7		
08/08/25 18:05	29.9		4.85			9.9			263			27.3			679087.8		
08/08/25 18:06	28		3.71			9.1			263.3			27.4			705000		
08/08/25 18:07	27		2.78			9			263.1			27.4			717785.1		
08/08/25 18:08	26.6		2.34			7.4			262.9			27.4			717268.3		
08/08/25 18:09	26.4		2.61			7.3			263.2			27.4			731852		
08/08/25 18:10	26.4		2.95			7.9			262.2			27.4			729218.5		
08/08/25 18:11	26.4		2.95			8.3			262.6			27.4			730271.9		
08/08/25 18:12	26.3		2.72			8.2			263.3			27.5			732115.3		
08/08/25 18:13	26.2		2.61			8.2			263.1			27.5			731588.6		
08/08/25 18:14	26.2		2.61			8.2			263.3			27.6			732115.3		
08/08/25 18:15	26.2		2.61			8.5			263.5			27.6			732905.4		
08/08/25 18:16	26.1		2.61			8.7			263.3			27.6			732115.3		

	CT5_NOx_S	CR_Ppm_1M	CT5_NOx_I	Ppmvd	c_1M	CT5_NH3Slip	_Ppmv	/dc_1M	CT5_GasFlo	w_ksc	fh_1M	CT5_Load	_MWe_1	IM ;	T5_ExhaustFlo	w_Lbl	PerHr_1l
Date/Time	Value	SI Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Mode
08/08/25 18:17	26		2.5		1	8.6			263			27.6			731325.3		
08/08/25 18:18	26.1	i.	2.5			8.6			263.7			27.6			733432.1		
08/08/25 18:19	26.1		2.61			9			264.1			27.7			734485.5		
08/08/25 18:20	26.1	1	2.61			9			264			27.7			734222.2		
08/08/25 18:21	26.1		2.5			9			264.6			27.7			735802.3		
08/08/25 18:22	26.2		2.5			9			264.8			27.8			736329		
08/08/25 18:23	26.3		2.5			9			265.2			27.8			737645.7		
08/08/25 18:24	26.3		2.61			9.4			263.3			27.7			732115.3		
08/08/25 18:25	26.4		2.5			9.3			263.9			27.8			733958.8		
08/08/25 18:26	26.5		2.5			9.6			264.1			27.8			734485.5		
08/08/25 18:27	26.6		2.5			12.8			265			27.8			736855.7		
08/08/25 18:28	26.6		2.27			14			264.9			27.9			736592.3		
08/08/25 18:29	26.5		1.93			14.8			265.9			28			739489.2		
08/08/25 18:30	26.5		1.7			10.6			264.9			27.9			736592.3		
08/08/25 18:31	26.4		1.82			9.2			264.8			27.8			736329		
08/08/25 18:32	26.5	1	2.27			9.8			264.4			27.8			735275.6		
08/08/25 18:33	26.6		2.5			10.4			265.5			28			738435.8		
08/08/25 18:34	26.5		2.38			10.4			266			28.1			739752.5		
08/08/25 18:35	26.3		2.27			10.3			267.1			28.2			742912.7		
08/08/25 18:36	26.3		2.27			10.4			267.8			28.2			744756.2		
08/08/25 18:37	26.2		2.27			10.4		į	268			28.3			745282.9		
08/08/25 18:38	26.1		2.23			10.9			268.1			28.3			731479.3		
08/08/25 18:39	26.1		2.12			10.9			267.9			28.3			730962.6		
08/08/25 18:40	26.1		2.12			10.9			268.2			28.3			731737.7		
08/08/25 18:41	26.1		2.12			10.9			267.7			28.3			730445.8		
08/08/25 18:42	26.2		2.67	X		6	X		268.2			28.3			923383.3	Х	
08/08/25 18:43	26.1		2.04	Х		10.5	Х		267.7			28.3			744492.8	Х	
08/08/25 18:44	26.2		2.12	Х		10.9	Х		267.6			28.3			730187.4	Х	
08/08/25 18:45	26.2		2.27	Х		10.5	Х		267.9			28.3			745019.5	Х	
08/08/25 18:46	26.3		2.12			10.9			267.2			28.3			729153.9		
08/08/25 18:47	26.3		2.27			10.5			267.7			28.2			744492.8		
08/08/25 18:48	26.4		2.27			10.7			267.1			28.2			742912.7		
08/08/25 18:49	26.4		2.27			10.7			267			28.2			742649.4		
08/08/25 18:50	26.3		2.27			10.8			266.9			28.2			742122.7		
08/08/25 18:51	26.3		4.53	Х		7.1	Х		267.1			28.2			898406.1	Х	

	CT5_NOx_S	CR_Ppm_1M	CT5_NOx_I	Ppmvd	c_1M	CT5_NH3Slip	_Ppm	vdc_1M	CT5_GasFlo	ow_ksc	fh_1M	CT5_Load	_MWe	_1M	T5_ExhaustFlo	w_Lb	PerHr_1N
Date/Time	Value	SI Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Modc	Value	SI	Mode	Value	SI	Modc
08/08/25 18:52	26.3		1.6	Х		0	Х		267			28.2			0	Х	
08/08/25 18:53	26.3		-0.2	Χ		0	Χ		267.4			28.2			0	X	
08/08/25 18:54	26.3		-0.2	Х		0	X		268.1			28.3			0	Х	
08/08/25 18:55	26.3		-0.2	Χ		0	Χ		267.9			28.3			0	X	
08/08/25 18:56	26.2		-0.18	Х		15.6	Х		267.4			28.3			594962.2	Χ	
08/08/25 18:57	26.1		2.37	Χ		64.6	Χ		267.8			28.3			185298.2	X	
08/08/25 18:58	26		2.68	Χ		64.8	Χ		267.2			28.3			184905.1	Х	
08/08/25 18:59	25.9		2.68	Х		64.7	Х		267.8			28.3			185298.2	Х	
08/08/25 19:00	25.8		2.71	Х		64.6	Х		268.1			28.3			185494.8	Х	
08/08/25 19:01	25.7		5.42	Х		65.3	Х		267.3			28.3			184970.6	X	
08/08/25 19:02	25.7		106.31	Χ		85.9	Х		266.9			28.3			184643	X	
08/08/25 19:03	26.1		142.67	Χ		93.1	Х		267.6			28.3			185167.1	Х	
08/08/25 19:04	26.8		142.67	Х		93.3	Х		266.6			28.3			184446.4	X	
08/08/25 19:05	27.2		142.73	Х		93.2	Х		267.1			28.3			184839.5	Х	
08/08/25 19:06	27.4		132.2	Χ		91.1	Х		266.9			28.3			184643	Х	
08/08/25 19:07	27.4		21.45	Х		68.5	Х		268.1			28.3			185494.8	Х	
08/08/25 19:08	27.5		0.31	Χ		64.2	Х		267.2			28.3			184905.1	Х	
08/08/25 19:09	27.6		0.23	X		64.3	Х		266.8			28.3			184577.4	Х	
08/08/25 19:10	27.5		0.11	Х		64.3	Х		266.9			28.3			184643	Х	
08/08/25 19:11	27.4		0.14	Х		37.2	Х		266.6			28.3			305946.8	Х	
08/08/25 19:12	27.3		1.08	Х		9	Х		266.5			28.3			786440.9	Х	
08/08/25 19:13	27.1		1.93	Х		10.5	Х		266.9			28.3			742122.7	X	
08/08/25 19:14	26.9		2.38	Х		10.6	Х		267.2			28.3			743176.1	Х	
08/08/25 19:15	26.9		2.38	Х		10.7	Х		266.9			28.3			742122.7	Х	
08/08/25 19:16	27		2.38			10.7			266.5			28.3			741069.3		
08/08/25 19:17	27.1		2.38			10.6			267.4			28.3			743702.8		
08/08/25 19:18	27.2		2.38			10.8			267.3			28.3			743439.4		
08/08/25 19:19	27.4		2.38			11			266.9			28.3			742122.7		
08/08/25 19:20	27.5		2.5			11			266.8			28.3			741859.3		
08/08/25 19:21	27.5		2.5			11			266.8			28.3			741859.3		
08/08/25 19:22	27.5		2.5			11.2			267.4			28.3			743702.8		
08/08/25 19:23	27.4		2.38			11.2			268.1			28.3			745546.2		
08/08/25 19:24	27.4		2.38			11.2			267			28.3			742649.4		
08/08/25 19:25	27.1		2.27			11.3			266.9			28.3			742122.7		
08/08/25 19:26	27		2.16			11.1			266.2			28.3			740279.2		

Thursday, August 14, 2025

	CT5_NOx_S	CR_Ppm_1M	CT5_NOx_I	Ppmvdc_1M	CT5_NH3Slip	p_Ppmvdc_1M	CT5_GasFle	ow_kscfh_1M	CT5_Load	_MWe_1M	T5_ExhaustFl	ow_Lt	oPerHr_1N
Date/Time	Value	SI Modc	Value	SI Mod	c Value	SI Modc	Value	SI Modc	Value	SI Modc	Value	SI	Modc
08/08/25 19:27	26.8		2.16		11.1		266.7		28.3		741596		
08/08/25 19:28	26.7		2.04		11.1		266.6		28.3		741332.6		
08/08/25 19:29	26.6		2.04		10.7		266.5		28.3		741069.3		
08/08/25 19:30	26.5		1.93		10.8		266.6		28.3		741332.6		
08/08/25 19:31	26.5		2.04		10.6		267.2		28.3		743176.1		
08/08/25 19:32	26.6		2.04		10.4		268.1		28.3		745546.2		
08/08/25 19:33	26.6		2.04		10.6		266.9		28.3		742122.7		
08/08/25 19:34	26.5		2.04		10.7		266.7		28.3		741596		
08/08/25 19:35	26.5		2.04		10.6		266.8		28.3		741859.3		
08/08/25 19:36	26.6		2.04		10.4		266.9		28.3		742122.7		
08/08/25 19:37	26.6		2.04		10.4		267.5		28.3		743966.1		
08/08/25 19:38	26.7		2.16		9.8		267.1		28.3		742912.7		
08/08/25 19:39	26.7		2.16		8.2		267.1		28.3		742912.7		
08/08/25 19:40	26.8		2.5		7.1		266.7		28.3		741596		
08/08/25 19:41	27		3.06		10.8		267		28.3		742649.4		
08/08/25 19:42	27		3.06		11.1		266.6		28.3		741332.6		
08/08/25 19:43	26.9		2.38		10.4		266.9		28.3		742122.7		
08/08/25 19:44	26.8		2.16		10		266.6		28.3		741332.6		
08/08/25 19:45	26.8		2.16		10		267		28.3		742649.4		
08/08/25 19:46	26.9		2.16		10		266.8		28.3		741859.3		
08/08/25 19:47	26.9		2.16		9.9		267.5		28.3		743966.1		
08/08/25 19:48	26.8		2.16		10		266.4		28.3		740805.9		
08/08/25 19:49	26.8		2.16		10		267		28.3		742649.4		
08/08/25 19:50	26.8		2.16		9.9		266.9		28.3		742122.7		
08/08/25 19:51	26.8		2.16		9.7		266.6		28.3		741332.6		
08/08/25 19:52	26.8		2.27		9.7		267.1		28.3		742912.7		
08/08/25 19:53	26.9		2.27		9.7		266.3		28.3		740542.6		
08/08/25 19:54	27		2.27		9.7		267.2		28.3		743176.1		
08/08/25 19:55	27		2.38		9.7		267		28.3		742649.4		
08/08/25 19:56	27.1		2.38		9.8		266.5		28.3		741069.3		
08/08/25 19:57	27.1		2.38		9.9		267.3		28.3		743439.4		
08/08/25 19:58	27.1		2.38		10.1		261.2		27.4		726321.6		
08/08/25 19:59	25.4		2.46		7.8		195.7		18.6		589708.4		
08/08/25 20:00	19		2.7		5.8		81.8		4.5		338052.2		
08/08/25 20:01	15.4		3.93		-6.6		36.7		0		354224.4		

	CT5_NOx_S	CR_Ppm_1M	CT5_NOx_f	pmvdc_1M	CT5_NH3Slip	o_Ppmvdc_1M	CT5_GasFlo	ow_kscfh_1M	CT5_Load_	MWe_1M	5_ExhaustFlo	w_LbPerHr_1N
Date/Time	Value	SI Modc	Value	SI Modc	Value	SI Modc	Value	SI Modc	Value	SI Modc	Value	SI Modc
08/08/25 20:02	13.3		2.75		-5.6		38.3		0		368831.6	
08/08/25 20:03	14.8		2.15		-1.5		38.1		0		250231.2	
08/08/25 20:04	15.9		2.05		-1.6		38		0		238756.2	
08/08/25 20:05	16.9		2.57		0.1		28.4		0		178620.6	
08/08/25 20:06	10.3		1.3		97.2		0.4		0		4564.7	
08/08/25 20:07	0.5		1		0		0.1		0		0	
08/08/25 20:08	0.4		0.3		0		0.4		0		0	
08/08/25 20:09	0.3		-0.1		0		0.8		0		0	
08/08/25 20:10	0.3		-0.1		0		1.1		0		0	
08/08/25 20:11	0.2		-0.1		0		-0.7		0		0	
08/08/25 20:12	0.2		-0.2		0		0.4		0		0	
08/08/25 20:13	0.2		-0.1		0		0.1		0		0	
08/08/25 20:14	0.1		-0.1		0		0.2		0		0	
08/08/25 20:15	0.1		-0.2		0		0.2		0		0	

Year

Non-Compliance Event Number



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 - 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)
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 8/20/25 Time 1400 ☐ AM ☒ PM
7.	Start of Non-Compliance Event Date 8/20/25 Time 1350 ☐ AM ☐ PM ☐ Not known
8.	Violation Permit No. REPR-20-03 Condition No. 35 a. ii Rule Section
9.	Unit / Equipment Involved CT5
10.	Description / Cause of Non-Compliance Event information attached ammonia pump tripped during start up
11.	Immediate Corrective Actions Restarted pump
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 Eddie Vasquez Telephone (916) 746 - 1683
	Signature Date 8/21/25 Time 0930 ☑ 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-Complia	nce Event	Date	e 8/10/15	Time	1403	□ AM □	⊠ PM
15.	Duration of Non-Compliance Event			irs O	Mir	nutes 13		
16.	Excess Emissions E	stimates	NOx 4,7	816	SOx		PM	
	VOC	CO		Opacity	%, for	minutes	other	•
17.	Variance in Effect		Yes 🗌	Variance #		No 🔀		
18.	Corrective and Preversiture Events		ons Taken ional information		Emissions	(b)	Correct Event	(c) Prevent
	If Not Able to Determ Equipment Failure of If yes, do you Reque Breakdown Under Di	r Malfunctio st that the V	n ĭiolation, Fai					
	Yes 🗌 No	If "Ye	s", complete a	nd submit the Up	set / Breakdow	n Checklist Fon	m if not previously s	submitted with Part I
20.	Submitted By	Ab O	RIBORD	4, WATHAN		Telephon	e (916) 746 -	1673
	I certify under penalty of information and belief for							
	Signature The	16		Date of	125	Time 1305		АМ 🚻 РМ

Revised 06/13 Page 1 of 3

	Ye	ar			
2	0		-		

UPSET / BREAKDOWN AND EMERGENCY CHECKLIST

Non-Compliance Event Number

	Company	Name				
	Detection	of Non-	Compliance Event	Date	Time	☐ AM ☐ PM
рι	ursuant to F	Rule 40	4, and/or an "Emerge	ency" Event pur	rmining whether an event is a suant to Rule 507. To be cons estions must be answered wit	sidered as a legitimate Upset
Y	es <u>No</u>					
		1.			reakdown event have been th minimizing emissions.	designed, maintained, and
		2.	The amount and dur	ration of emissi	ons as a result of the event ha	ve been minimized.
		3.			pattern of previous breakdown dicative of inadequate equip	
		4.	The event is not the (i.e., the facility is be		ator error, negligence, careles erated).	sness, or willful misconduct
		5.	The event is not the	result of impro	per equipment design.	
		6.	The event is not the	result of impro	per preventative maintenance	of equipment.
		7.	The event is the rest of the operator.	ult of a sudden,	unavoidable breakdown of eq	uipment, beyond the control
		8.			eseen or avoided or planned for ating and maintenance praction	
		9.	The event has not re	esulted in a nuis	sance.	
		10.	The event is not the	result of the di	sregard of air pollution rules or	regulations.
		11.			been completed and submitte om the end of the Non-Complia	
		12.	Immediate corrective on the Part I Non-Co		oeen taken to minimize emissi t Notification Form.	ons, as described in Item 11
or		and be			r this facility, or his/her duly desigr statements and information in th	
Si	gnature _					
	/ Breakdown	n" Event	under District Rule 404	I. A breakdown o	ion because the Non-Compliance ondition means an unforeseeable ment which causes a violation	failure or malfunction of 1) any

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





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 #2025-018 PART II

This memo provides supplemental details to the Non-Compliance Event Notification #2025-018 submitted on August 21, 2025, regarding an incident involving RPEAK Combustion Turbine #5 (CT5) on August 20, 2025.

A correction to the Part I, in addition to the Part II, is attached. Line 10 of the Part I dated 8/21/25 should read "water injection pump tripped during start up".

Incident Summary:

Fuel Flow Start: 13:52

Full Load Achieved: 14:02

Fuel Flow Stop: 14:58

- Event: Excess emissions NOx Lbs Per Startup/Shutdown at 4.78lb due to trip of NOx water injection pump.
- Response: Engine NOx water injection pump reset and restarted.
- Investigation: Typical engine starts see water flow approximately 5-min after fuel flow commences (Attachment). CT5 water injection started at approximately 5-min into the run, and immediately tripped offline. About 4-minutes later the water inject pump was reset and started. Due to the lack of water injection the SCR experienced high inlet NOx that could not be corrected. The minutes following the incident elevated ammonia injection flows can be observed due to the controller being 'spooled up' due to the transient, settling into expected conditions 20-25 minutes into the run.

No apparent cause for the water pump tripping offline.