

DOCKETED

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California
ENERGY COMMISSION



CALIFORNIA
**NATURAL
RESOURCES
AGENCY**

DATE: March 4, 2026

TO: Interested Parties

FROM: John Heiser, Compliance Project Manager

SUBJECT: Gateway Generation Station (00-AFC-01C)
CEC Staff Analysis of Petition to Amend the Final Commission Decision

On September 25, 2025, the Pacific Gas and Electric Company (project owner) filed a Post-Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision (Final Decision) ([TN 266146](#)) with the California Energy Commission (CEC). The project owner is requesting to amend the Gateway Generating Station (GGS) Air Quality Conditions of Certification (COCs) to modify **AQ-SC12** and delete **AQ-SC13**. Both conditions of certification were imposed by the CEC in 2018 ([TN 224461](#)) to monitor emissions at start up after certain maintenance operations at the GGS and to ensure the facility operates in compliance with all laws, ordinances, regulations, and standards (LORS).

GGS is a 530-megawatt (MW) combined-cycle, natural gas facility that was certified by the CEC in May 2001. It began commercial operation in January 2009. The facility is within the site complex of the existing Contra Costa Power Plant in Contra Costa County, just north of the City of Antioch.

DESCRIPTION OF PROPOSED CHANGE

The project owner seeks approval to modify the COC **AQ-SC12** and delete COC **AQ-SC13** in the Final Decision. The reason for the amendment requests is related to operational challenges.

These conditions, COC **AQ-SC12** and COC **AQ-SC13**, were included on August 10, 2018, [TN 224461](#), after the CEC and the project owner, entered into a Settlement Agreement and CEC amended the Final Decision, detailed in the Executive Summary below.

The requested changes to the COCs include impacts to facility reliability and minimizing facility operations and downtime especially in the summer months during peak loads.

The proposed AQ-12 text amendments include additional measures for continued compliance and verification reporting with the CEC and the Bay Area Air District (BAAD).

To access the petition to amend, go to the [CEC's project webpage](#), <https://www.energy.ca.gov/powerplant/combined-cycle/gateway-generating-station>. In the box labeled "Compliance Proceeding" click on the Docket Log (00-AFC-01C) and locate the petition by the transaction number noted above.

CEC STAFF REVIEW AND CONCLUSIONS

Consistent with the California Code of Regulations, title 20, section 1769, the CEC staff (staff) has reviewed the petition for potential environmental effects and consistency with LORS. Based on staff analysis, contained below, staff has concluded that the proposed modifications to COCs Air Quality **AQ-SC12** and **AQ-SC13** would not have a significant effect on the environment, or cause the Gateway Generating Station to fail to comply with any applicable LORS. Consistent with California Code of Regulations, title 20, section 1769(a)(4), staff is bringing this petition to the Commission for approval.

Staff conclude that none of the findings specified in California Code of Regulations, title 20, section 1748(b) apply to the proposed change.

Lastly, staff concludes the proposed change does not meet any of the criteria requiring the production of subsequent or supplemental review pursuant to Public Resources Code section 21166.

Staff intends to recommend approval of the petition at the April 8, 2026, Business Meeting of the CEC.

The CEC's [project webpage](#), <https://www.energy.ca.gov/powerplant/combined-cycle/gateway-generating-station> has a link to the petition and the Staff Analysis on the right side of the webpage in the box labeled "Compliance Proceeding." Click on the "[Docket Log \(00-AFC-01C\)](#)" option. If approved, the CEC's Order approving this petition will also be available from the same webpage.

This letter has been mailed to the CEC's list of interested parties and property owners of all parcels within 500 feet of any affected project linear facilities and 1,000 feet of the project site. It has also been emailed to the GGS subscription list. The list is an automated CEC email system by which information about this facility is emailed to parties who have subscribed. To subscribe, go to the [CEC's project webpage](#), cited above, scroll down the right side of the project's webpage to the box labeled "Subscribe," and provide the requested contact information.

Any person may comment on the Staff Analysis. Those who wish to submit comments on the analysis prior to the CEC Business meeting may do so by using the CEC's electronic commenting feature. Go to the [CEC's project webpage](#) and click on either the

"Comment on this Proceeding," or "[Submit e-Comment](#)" link. When your comments are filed, you will receive an email with a link to them.

Written comments may also be mailed or hand-delivered to:

California Energy Commission
Docket Unit, MS-4
Docket No. 00-AFC-01C
715 P Street
Sacramento, CA 95814-5512

Comments will also be accepted during the scheduled business meeting. All comments and materials filed with the Dockets Unit will be added to the facility Docket Log and become publicly accessible on the [CEC's project webpage](#).

If you have questions about this notice, please contact Compliance Project Manager John Heiser, Compliance Monitoring and Enforcement Unit, Safety and Reliability Branch, at (916) 628-5566 or via e-mail at John.Heiser@energy.ca.gov.

For information on public participation, please contact the CEC's Office of Public Advisor, Energy Equity, and Tribal Affairs at (916) 957-7910 or email at publicadvisor@energy.ca.gov.

News media inquiries should be directed to the CEC's Media Office at (916) 654-4989, or by e-mail to mediaoffice@energy.ca.gov.

Mail List: 755
Subscription: Gateway Generating Station

GATEWAY GENERATING STATION (00-AFC-01C)
Petition to Amend Commission Decision
EXECUTIVE SUMMARY

John Heiser

INTRODUCTION

On September 25, 2025, the Pacific Gas and Electric Company (PG&E or project owner) filed a Post-Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision (Final Decision) ([TN 266146](#)) with the California Energy Commission (CEC). The project owner is requesting to amend the Gateway Generating Station (GGS) Air Quality Conditions of Certification (COCs) to modify **AQ-SC12** and delete **AQ-SC13**. Both conditions of certification were imposed by the CEC in 2018 ([TN 224461](#)) to monitor emissions at start up after certain maintenance operations at the GGS and to ensure the GGS operates in compliance with all laws, ordinances, regulations, and standards (LORS).

GGS is a 530-megawatt (MW) combined-cycle, natural gas facility that was certified by the CEC in May 2001. It began commercial operation in January 2009. The facility is within the site complex of the existing Contra Costa Power Plant in Contra Costa County, just north of the City of Antioch.

DESCRIPTION OF PROPOSED CHANGE(S)

The project owner seeks approval to modify the COC **AQ-SC12** and delete COC **AQ-SC13** in the Final Decision. The reason for the amendment requests is related to operational challenges detailed below.

The visual emissions evaluation (VEE) requirements, as outlined in COC **AQ-SC13**, present an operational challenge to the GGS facility by limiting the response time in which the plant can restart operations after an outage. Relevant considerations that impact GGS's ability to operate include making arrangements for a certified VEE individual to be onsite and required notification to the CEC and the Bay Area Air District (BAAD) 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 California Air Resources Board (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, which impact PG&E customers and create

unnecessary risk. The GGS plant is at a competitive disadvantage as other plants do not have VEE requirements.

Further, the project owner has complied with these VEE requirements for the past six years and this Petition to Amend (PTA or petition) request includes five additional, proposed precautionary measures to be added to COC **AQ-SC12** in the proposed removal of COC **AQ-SC13**, which creates challenging notification and VEE inspection requirements. The project owner would still be required to comply with existing AQ COC reporting requirements, which include the BAAD, CEC, CARB, and the United States Environmental Protection Agency.

These conditions, COC **AQ-SC12** and COC **AQ-SC13**, were included on August 10, 2018, [TN 224461](#), after the CEC and the project owner, entered into a Settlement Agreement and CEC amended the Final Decision.

AQ-SC12 proposed modifications: (bold, underline and italicized text)

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:

1. 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
2. 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 precautionary measures to ensure loose debris that could exit the heat recovery generator exhaust stack, is mitigated following maintenance activities. These measures include, but are not limited to the following:

a. Thorough inspection of the heat recovery generator exhaust stack will be performed.

b. Loose debris in the heat recovery generator exhaust stack will be removed by appropriate means, such as dry ice blasting, vacuuming, or brushing.

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

AQ-SC13 proposed deletion: (Strike out text)

~~**AQ-SC13** The project owner shall perform a visible emissions evaluation (VEE) using EPA Method 9 during any restart of the turbine following any maintenance activities requiring the Heat Recovery Steam Generator (HRSG) to be opened. For the purpose of this condition, restart shall include anytime the turbine is operated after being taken offline for maintenance activities and prior to the actual return to commercial service. The individual performing the evaluation shall be trained and certified in Method 9 evaluations.~~

~~The project owner shall notify the BAAQMD and the Energy Commission CPM at least 7 days prior to any VEE performed for a restart after scheduled maintenance activities and as soon as practicable for a restart after unscheduled maintenance activities.~~

~~**Verification:** At least 7 days prior to the VEE for a restart after scheduled maintenance activities and as soon as practicable for a restart after unscheduled maintenance activities, the project owner shall notify the BAAQMD and Energy Commission CPM of the anticipated restart(s) and shall provide documentation of certification of the individual performing the VEE. The project owner shall make the site available to representatives of the BAAQMD, ARB, EPA and Energy Commission CPM for viewing the restart(s). The VEE results shall be submitted to the Energy Commission CPM within 7 days of any restart.~~

Staff reviewed the petition for potential environmental effects and consistency with LORS. Staff's conclusions for all technical and environmental areas are summarized in **Table 1.**

TABLE 1
Summary of Conclusions for all Technical and Environmental Areas

Technical Areas Reviewed	CEQA				Conforms with applicable LORS
	Potentially Significant Impact	Less Than Significant Impact with Mitigation (with Revised or New COCs)	Less Than Significant Impact (with or without Existing COCs)	No Impact	
Air Quality		X			Yes
Biological Resources				X	Yes
Cultural Resources				X	Yes
Efficiency				X	
Facility Design					Yes
Geological Resources				X	Yes
Hazardous Materials Management			X		Yes
Land Use				X	Yes
Noise and Vibration				X	Yes
Paleontological Resources				X	Yes
Public Health		X			Yes
Reliability					
Socioeconomics				X	
Soil and Water Resources				X	
Traffic and Transportation				X	Yes
Transmission Line Safety and Nuisance				X	Yes
Transmission System Engineering					Yes
Visual Resources				X	Yes
Waste Management				X	
Worker Safety and Fire Protection			X		Yes

Areas shown in gray are not subject to CEQA consideration or have no applicable LORS the project must comply with.

Staff have determined that the modified COCs would continue to comply with applicable LORS, and the project change would not result in any significant adverse environmental impacts or require a change to any conditions of certification, other than the changes to air quality conditions of certification.

The basis for each of staff's conclusions is provided below:

AIR QUALITY

The project proposes to delete **AQ-SC13**, which requires visible emissions evaluation (VEE) during restarts following maintenance activities to provide a restart-specific mechanism to verify compliance. Staff reviewed the project's compliance reports since the adoption of **AQ-SC13**. Following each restart event, a CARB-certified method 9 observer conducted a one-hour VEE with 15-second opacity readings and confirmed that no visible emissions exceeded Ringelmann No.1¹. Additionally, no complaints related to visible emissions were received during the past six years. While compliance history alone is not the sole justification for deletion of the condition, this record provides supporting evidence that the risks addressed by **AQ-SC13** are being effectively mitigated through current operational practices.

In addition, the proposed modification to **AQ-SC12** would incorporate enhanced preventive maintenance measures including inspections, debris removal, internal vacuuming of flue gas spaces, dehumidification during extended lay-ups, and stack blinding. These measures provide an equivalent level of assurance that visible emissions would remain below applicable opacity standards, without reliance on a VEE.

The proposed modification would not introduce new emission sources or increase emissions. Therefore, the proposed changes would result in a less than significant impact, and the project would remain in compliance with all applicable LORS related to air quality.

BIOLOGICAL RESOURCES

The proposed modifications to the Air Quality COCs would have no impact to biological resources. The proposed changes would affect air quality monitoring and would not introduce new emission sources or increase emissions. No ground disturbing activities or impacts to biological resources would occur.

CULTURAL RESOURCES

The proposed modifications to the Air Quality COCs would have no impact to cultural resources. The proposed changes only impact air quality monitoring and do not have any potential for ground disturbing activities that could impact cultural resources.

¹ The Ringelmann scale is a scale for measuring the apparent density or opacity of smoke. Ringelmann No. 1 corresponds to an opacity of 20%.

EFFICIENCY

The proposed modifications to Air Quality COCs would not impact the efficiency of the project. The proposed changes would facilitate quicker restart operations. No LORS apply to power plant efficiency.

FACILITY DESIGN

The proposed modifications to the Air Quality COCs would not involve construction or ground disturbing activities. The project would continue to meet the existing Facility Design conditions of certification adopted in the Final Decision.

GEOLOGICAL AND PALEONTOLOGICAL RESOURCES

The proposed modifications to the Air Quality COCs would not involve construction or ground disturbing activities. The proposed changes would have no impacts related to geology, paleontology, and mineral resources.

HAZARDOUS MATERIALS MANAGEMENT

The proposed modifications to COC **AQ-SC12** and deletion of COC **AQ-SC13** would not involve hazardous materials. The petition to amend does not involve construction or ground disturbing activities. The precautionary measures described in the proposed modifications to COC **AQ-SC12** would not require additional hazardous materials beyond those listed in the original Final Decision. Compliance with applicable LORS would ensure less than significant impacts related to hazardous materials management. Therefore, the proposed changes would have a less than significant impact to the offsite public or the environment.

LAND USE

The proposed modifications to the Air Quality COCs would not result in a change in land use. There are no land use impacts, and the facility would remain in compliance with applicable LORS.

NOISE AND VIBRATION

The proposed modifications to Air Quality COCs would not involve construction or ground disturbing activities and therefore would not impact the noise and vibration levels of the project.

The operational noise would not be affected because of this petition to amend. Furthermore, the project would continue to meet operational noise requirements established in the Final Decision. Therefore, the modifications proposed in this petition would result in no impact due to operational noise.

PUBLIC HEALTH

The proposed changes would remove the VEE monitoring requirement under **AQ-SC13**. The project owner has demonstrated consistent compliance with applicable opacity

limits for more than six years in the compliance records. Further, no public complaints were received during this time related to visible emissions. With the implementation of enhanced preventive maintenance measures included in the updated modified **AQ-SC12**, the project is expected to continue to comply with the opacity limits.

The proposed changes would not introduce new emission sources or increase emissions. Therefore, the modification to these conditions of certification would result in a less than significant impact to public health. The project would remain in compliance with applicable LORS related to public health.

RELIABILITY

The proposed modifications to Air Quality COCs would not adversely impact the reliability or power generation capability of the project and would support quicker restart operations.

SOCIOECONOMICS

The proposed modifications to the Air Quality COCs would not involve any additional workforce. No workforce related impacts on population, housing, public services, and recreation would occur.

SOIL AND WATER

The proposed modifications to the Air Quality COCs do not involve construction or ground disturbing activities. Therefore, soil and water resources would not be impacted. The project would remain in applicable LORS related to soil and water resources and changes to the existing COCs would not be required.

TRAFFIC AND TRANSPORTATION

The proposed modifications to the Air Quality COCs would not generate any additional vehicle trips. Impacts to transportation, including vehicle miles traveled, would not occur and the project would remain in compliance with applicable LORS.

TRANSMISSION LINE SAFETY AND NUISANCE

The proposed modifications to Air Quality COCs would not change the existing level of electrical field or electromagnetic field from the substation equipment or the transmission system. Therefore, the existing COCs would ensure compliance with applicable LORS and would continue to minimize impacts related to Transmission Line Safety and Nuisance to less than significant. Thus, the proposed changes would have no impact on the public.

TRANSMISSION SYSTEM ENGINEERING

The proposed modifications to the Air Quality COCs would not result in any changes to the existing transmission lines; therefore, there would be no impacts to Transmission

System Engineering. The project would continue to comply with applicable LORS and would not require any changes to the Transmission System Engineering COCs.

VISUAL RESOURCES

The proposed modifications to the Air Quality COCs would not introduce a visual change to the existing physical environment on the site or in the surrounding vicinity. There would be no impacts to visual resources, and the project would remain in compliance with applicable LORS.

WASTE MANAGEMENT

The proposed modifications to the Air Quality COCs would not impact waste management. The project would remain in compliance with applicable LORS related to solid waste and changes to the existing COCs would not be required.

WORKER SAFETY AND FIRE PROTECTION

The proposed changes do not involve construction or ground disturbing activities. During maintenance activities associated with the proposed modifications to COC **AQ-SC12**, existing COC **WORKER SAFETY-2** would ensure compliance with applicable LORS and would ensure less than significant impacts related to worker safety and fire protection. Therefore, the proposed changes would have a less than significant impact to the onsite worker health and safety or the offsite public.

CALENVIROSCREEN 4.0

CALENVIROSCREEN

Staff reviewed CalEnviroScreen 4.0 data to determine whether the United States census tract where the Gateway Generating Station is located (6013306002) is identified as a disadvantaged community. This science-based mapping tool is used by the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria pursuant to Health and Safety Code section 39711 as enacted by Senate Bill 535 (De León, Chapter 830, Statutes of 2012). The CalEnviroScreen 4.0 overall percentile score for this census tract is 72 and, thus, is not identified as a disadvantaged community².

² The four categories of geographic areas identified by CalEPA as disadvantaged are: 1) Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0, 2) Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores, 3) Census tracts identified in the 2017 DAC designation, regardless of their scores in CalEnviroScreen 4.0, and 4) Lands under the control of federally recognized Tribes. Source: CalEPA Final Designation of Disadvantaged Communities: May 2022 <https://calepa.ca.gov/envjustice/ghginvest/>

ENVIRONMENTAL JUSTICE

Environmental Justice Figure 1 shows 2020 census blocks in the six-mile radius of the Gateway Generating Station a minority population greater than or equal to 50 percent. The population in these census blocks represents an environmental justice (EJ) population based on race and ethnicity as defined in the United States Environmental Protection Agency's *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. Staff conservatively obtains demographic data within a six-mile radius around a project site based on the parameters for dispersion modeling used in staff's air quality analysis. Air quality impacts are generally the type of project impacts that extend the furthest from a project site. Beyond a six-mile radius, air emissions have either settled out of the air column or mixed with surrounding air to the extent the potential impacts are less than significant. The area of potential impacts would not extend this far from the project site for most other technical areas included in staff's EJ analysis.

Based on California Department of Education data in **Environmental Justice Table 1**, staff concluded that the percentage of those living in the River Delta Joint Unified and Antioch Unified school districts (in a six-mile radius of the project site) and enrolled in the free or reduced-price meal program is greater than those in the reference geography. Thus, it is considered an EJ population based on low income as defined in *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. **Environmental Justice – Figure 2** shows where the boundaries of the school districts are in relation to the six-mile radius around the Gateway Generating Station Plant site.

Environmental Justice – Table 1
Low Income Data within the Project Area

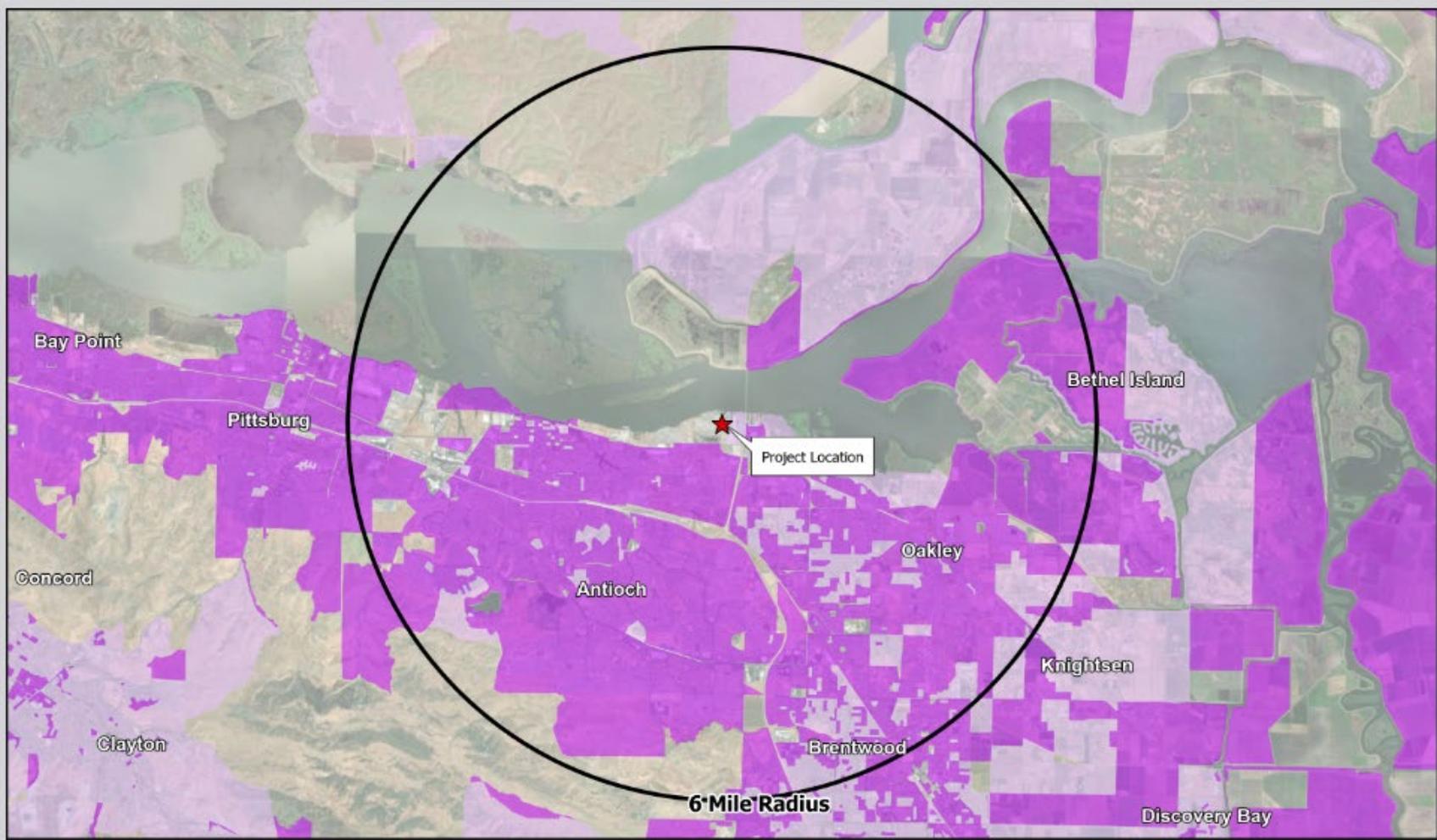
CONTRA COSTA COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS		Enrollment Used for Meals	Free or Reduced Price Meals	
Antioch Unified		16,199	12,662	78.2%
Brentwood Union		10,049	4,098	40.8%
Oakley Union Elementary		5,131	2,243	43.7%
REFERENCE GEOGRAPHY				
Contra Costa County		169,261	75,675	44.7%
SACRAMENTO SCHOOL DISTRICTS IN SIX-MILE RADIUS		Enrollment Used for Meals	Free or Reduced Price Meals	
River Delta Joint Unified		2,039	1,419	69.6%
REFERENCE GEOGRAPHY				
Sacramento County		258,235	161,714	62.6%

Source: CDE 2025. California Department of Education, DataQuest, Free or Reduced Price Meals, District level data for the year 2024-2025, <http://dq.cde.ca.gov/dataquest/>.

The following technical areas (if affected) consider impacts to EJ populations: Air Quality, Cultural Resources (indigenous people), Hazardous Materials Management, Noise and Vibration, Public Health, Soil and Water Resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Visual Resources, Waste Management, and Worker Safety and Fire Protection.

Environmental Justice Conclusions

For this petition, the following technical areas considered impacts to EJ populations: Air Quality, Hazardous Materials Management, Public Health, and Worker Safety and Fire Protection. For these areas, staff concludes that impacts would be less than significant and thus would be less than significant on the EJ population represented in **Environmental Justice Figure 1, Figure 2, and Table 1.**



 6 Mile Radius
 Project Location

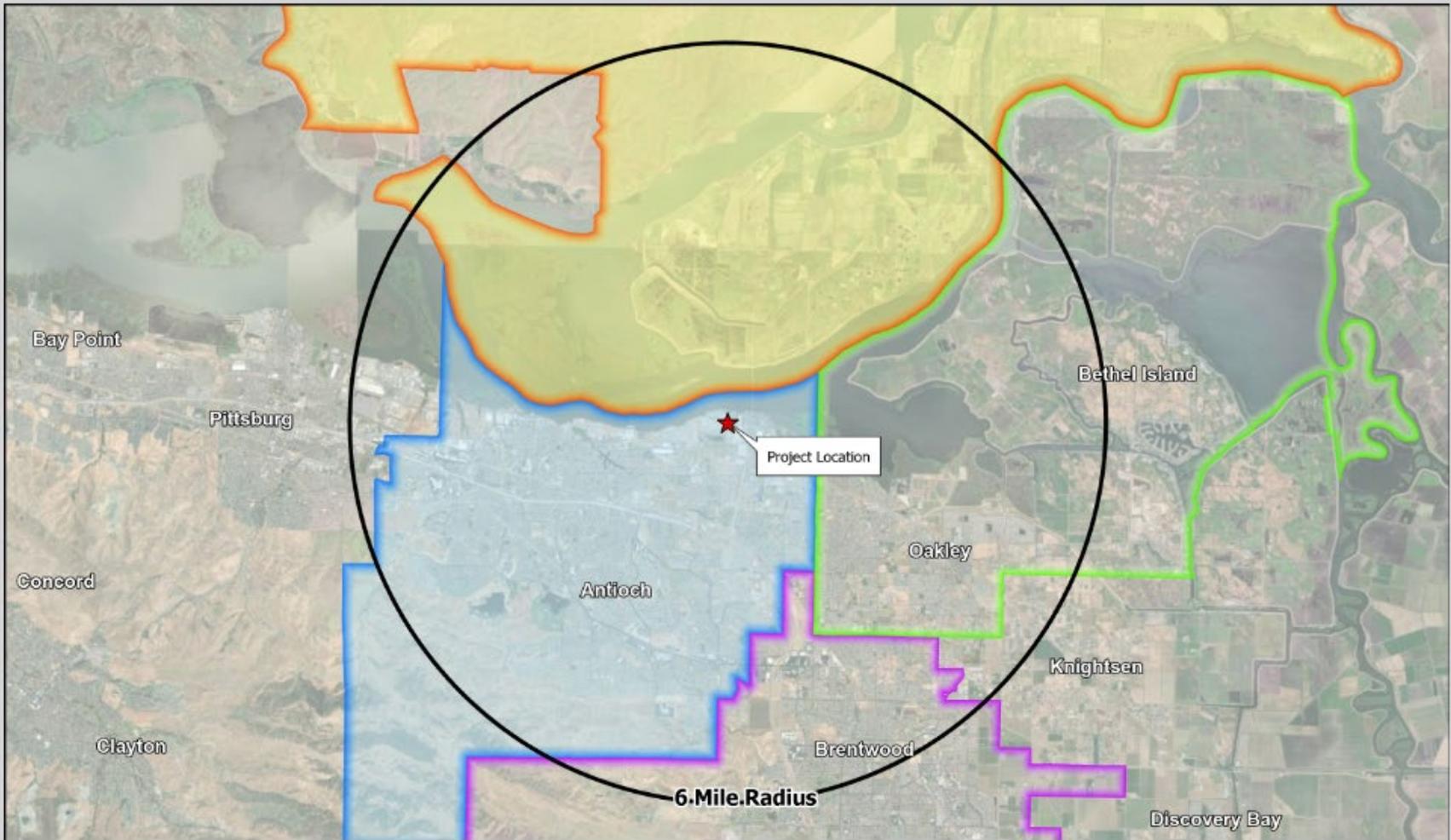
2020 Census
 Percent Minority Population by Census Block
 0 - 50%
 51 - 100%

Environmental Justice Figure 1

0 2 4

 Miles

Sources: Census 2020 PL 94-171 Data



 6 Mile Radius
 Project Location



School District

-  Antioch Unified School District
-  Brentwood Union Elementary School District
-  Oakley Union Elementary School District
-  River Delta Joint Unified School District

Environmental Justice Figure 2

Note: Shaded areas have an EJ population based on low income
 Sources: TIGER Data, CDE 2025

