DOCKETED	
Docket Number:	09-AFC-05C
Project Title:	Abengoa Mojave Compliance
TN #:	268953
Document Title:	Segment 001 of COMPLIANCE7-09-00 Mojave Solar Project 2025 Annual Compliance Report (09-AFC-05C)
Description:	N/A
Filer:	Mahnaz Ghamati
Organization:	Abengoa Solar
Submitter Role:	Applicant
Submission Date:	3/5/2026 1:53:34 PM
Docketed Date:	3/5/2026

Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347

Phone: 760 308 0400

09-AFC-5C Mojave Solar Project Annual Compliance Report 2025 Reporting Period

Prepared by:

Mahnaz Ghamati

For

Mojave Solar Project
42134 Harper Lake Road
Hinkley, California 92347

Mojave Solar LLC

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Subject:	**09-AFC-5C**
Condition Number:	**COMPLIANCE-7**
Description:	**Annual Compliance Report – January – December 2025**
Submittal Number:	**COMPLIANCE7-09-00**

February 26, 2026

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov

Dear Ms. Gutierrez,

As required by the California Energy Commission ("CEC") Condition of Certification COMPLIANCE-7, the following document is the 2024 Annual Compliance Report ("ACR"). The CEC Commission Decision includes the following requirements:

Annual Compliance Report (COMPLIANCE-7)

After construction is complete, the project owner shall submit Annual Compliance Reports instead of Monthly Compliance Reports. The reports are for each year of commercial operation and are due to the CPM each year at a date agreed to by the CPM. Annual Compliance Reports shall be submitted over the life of the project unless otherwise specified by the CPM. Each Annual Compliance Report shall include the AFC number, identify the reporting period, and shall contain the following:

1. An updated compliance matrix showing the status of all Conditions of Certification (Fully satisfied conditions do not need to be included in the matrix after they have been reported as completed).

2. A summary of the current project operating status and an explanation of any significant changes to facility operations during the year.

3. Documents required by specific conditions to be submitted along with the Annual Compliance Report. Each of these items must be identified in the transmittal letter, with

the condition it satisfies, and submitted as attachments to the Annual Compliance Report.

4. A cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM.

5. An explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided.

6. A listing of filings submitted to, or permits issued by, other governmental agencies during the year.

7. A projection of project compliance activities scheduled during the next year.

8. A listing of the year's additions to the on-site compliance file.

9. An evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date [see Compliance Conditions for Facility Closure addressed later in this section]; and

10. A listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved matters, and the status of any unresolved matters.

Please contact me with any questions.

Sincerely,

Mahnaz Ghamati
Quality, Environmental & Compliance Manager
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List of submittals and Approvals -Appendix E

This Annual Compliance Report (ACR) covers the period from January until December and is submitted on or before February 28 of the following year, upon agreement reached on October 27, 2016, between Dale Rundquist, Compliance Project Manager from the California Energy Commission for Mojave Solar Project and Abengoa Solar Inc. Operations Jose Manuel Bravo Romero Compliance, Quality and Environment Department Manager. Attached please find the email correspondence for your convenience. Appendix A.

The table below provides a summary of Mojave Solar Project (MSP) submissions to the California Energy Commission (CEC) for the period of January 2025 through December 2025.

MSP Submittals, Updates & Approvals			
1/13/2025	Submittal	AQ58-08-00	AQ58-08-00 Annual Fuel Throughput Report for Mojave Solar 2024. Facility #3130 Company #1876
1/14/2025	Submittal	BIO19-135-00	BIO19-135-00 Evaporation Pond Plan Quarterly Report _October-December 2024
1/16/2025	Submittal	WASTE10-60-00	WASTE10-60-00 HTF Contaminated Soil Lab Results for spills A-26F &A39D
2/5/2025	Submittal	SWAT6-34-00	SWAT6-34-00 Semi-Annual Detection Monitoring Program July-December 2024-Groundwater Monitoring Plan Report (09-AFC-5C)
2/11/2025	Submittal	COMP07-08-00	COMPLIANCE7-08-00 Mojave Solar Project 2024 Annual Compliance Report (09-AFC-5C)
4/10/2025	Submittal	NA	Mojave Solar Project- CEC 1304 Form (Q1 2025)
4/24/2025	Submittal	WASTE10-61-00	WASTE10-61-00 HTF Contaminated Soil Lab Results for spills Beta 86B,95D-Alpha 48H,197F
4/25/2025	Submittal	BIO19-136-00	BIO19-136-00 Evaporation Pond Plan Quarterly Report _January-March 2025
4/25/2025	Submittal	COMP10-08-00	COMP10-08-00 TN262752_zane Comments-Project External Lights
5/13/2025	Submittal	COMP10-09-00	COMP10-09-00 Employee Complaint to Cal/OSHA
6/5/2025	Submittal	AQ72-17-00	AQ72-17-00 Protocol for VOC _ Benzene Emissions Testing on Carbon System for Annual Test 2025

7/9/2025	Submittal	NA	Mojave Solar Project- CEC 1304 Form (Q2 2025)
7/21/2025	Submittal	BIO19-137-00	BIO19-137-00 Evaporation Pond Plan Quarterly Report _April-June 2025
8/5/2025	Submittal	SWAT6-35-00	SWAT6-35-00 Annual & 5-Year Detection Monitoring Program -Groundwater Monitoring Plan Report (09-AFC-5C)_ January-June 2025
8/26/2025	Submittal	COMP10-10-00	COMP10-10-00 Notice of Violation from Lahontan Regional Water Quality Control Board
9/9/2025	Submittal	AQ72-17-01	AQ72-17-01 Annual Compliance Test for VOC & Benzene Emissions, Carbon System 2025 (09-AFC-5C)
9/22/2025	Submittal	COMP10-11-00	COMP10-11-00 Notice of Violation from California Public Utilities Commission
9/23/2025	Submittal	WASTE10-62-00	WASTE10-62-00 HTF Contaminated Soil Lab Results for Spills Beta 99 G- 91 C- 72 I
10/24/2025	Submittal	BIO19-138-00	BIO19-138-00 Evaporation Pond Plan Quarterly Report _July-September 2025
10/24/2025	Submittal	NA	Mojave Solar Project- CEC 1304 Form (Q3 2025)
10/30/2025	Submittal	COMP10-10-01	COMP10-10-01 Notice of Violation from Lahontan Regional Water Quality Control Board-Workplan Submission
10/31/2025	Submittal	COMP10-11-01	COMP10-11-01 Closure Letter NOV-GE20240315-01
11/5/2025	Submittal	COMP10-09-01	COMP10-09-01 CalOSHA Inspection 1823730-Closure
12/15/2025	Submittal	BIO21-13-00	BIO21-13-00 Biological Opinion Annual Compliance Report 2025 (09-AFC-5C)

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Cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM:

No	Condition of Certification	Description	Date Submitted	Date Approval	Relevant Document
1	BIO-7	Request to remove the 25-mph restriction for MSP personnel driving on Harper Lake Road and allow them to drive the legal, posted speed limit, like other users of the road.	March 30, 2012, Petition to Amend	August 9, 2012, by the CEC	Order No. 12-0809-3 ORDER APPROVING a Petition to Modify Condition of Certification BIO-7 to Remove 25 mph Restriction on Harper Lake Rd.
2	HAZ-7	Request to eliminate the requirement for fire hydrant loops in the solar fields and revise Condition of Certification HAZ-7 regarding fire water loop infrastructure in the solar fields.	July 27, 2012, Petition to Amend		Order No. 12-1212-3 ORDER APPROVING a Petition to Amend the Energy Commission Decision (Condition of Certification HAZ-7)
3	Deletion of AQ-1 through AQ-8; Modifications to AQ-10, AQ-11, AQ-12, AQ-33,AQ-38, AQ-44, AQ-47, AQ-50 through AQ-59, "Reservation" (deletion) of AQ-13,AQ-14, AQ-15, AQ-17,AQ-18, AQ-19, AQ-20,AQ-37, AQ- 46; Addition of AQ-29a, AQ-	Changes in equipment and Power Block General arrangement affecting some Air Quality COCs	October 29, 2013, Revised Petition to Amend	April 22, 2014, by CEC	Order No. 14-0422-4 APPROVING a Petition to Amend Air Quality

	40a, AQ-60 through -74.				
4	AQ-25, AQ-26, AQ-28	Change to method for direct measurement of TDS in Cooling Towers	August 15, 2014, Petition for Modification	November 17, 2014, by CEC	OrderNo.14-1117-6 ORDER APPROVING a Petition to Amend the Energy Commission Decision (Conditions of Certification AQ-25, AQ-26, and AQ-28)
5	Adding GEN- 1.1, GEN-1.2, GEN-1.3	Fire-protection- system-related Conditions of Certification as part of a Settlement Agreement		December 19, 2016, by CEC	Resolution Approving Settlement - Resolution No:16-1214-4
6	COMP 14	Petition to Amend with the California Energy Commission. Alpha Warehouse	10/10/2019	2/13/2020	COMP 14-05-00 submittal
7	COMP 14	Petition for Improvement t with the CEC California Energy Commission. Carbon Adsorption system	2/13/2020		COMP 14-06-00 submittal
8	BIO19	Evaporation Pond and Adaptive Management Plan REV 8 (09-AFC-5C)	10/19/2021	11/27/2021	BIO19-98-00 Submittal
9	BIO17	Bird Monitoring Study Annual Report Second Year 2018-2109 (09-AFC-5C) - 3rd Revision- Final	10/29/2021	11/1/2021	BIO17-11-04 Submittal
10	PTA	09-AFC-05- PTA_Abengoa Mojave Solar Hydrogen Project	1/13/2022	6/8/2022	TN#243091 TN#241162
11	Non-PTA	Weeping system	4/1/2022	4/11/2022	Email approval
12	Non-PTA	Installation of SMI Supercat Evaporators	7/20/2022	3/17/2023	MOJAVE Approval Letter_Final_Signed

13	Non-PTA	Replacement of the cooling tower sodium hypochlorite tanks at Alpha and Beta power blocks with the addition of a 2-foot concrete wall on the existing concrete pads- Project Cancelation	4/6/2023	4/12/2023	Mojave Solar Project_Non_PTA Approval Letter_Sodium_Hypochlorite_Tanks
14	Non-PTA	Netting of Evaporation Ponds- Approval with Modification		6/15/2023	Email-06152023 Lake Tank Order---MSP Netting of Evaporation Ponds - APPROVAL WITH MODIFICATION
15	Non-PTA	Replacement of the two existing 528-gallon, sulfuric acid tanks with two larger 2,500-gallon tanks. In addition, the existing 2,600-gallon, sodium hypochlorite tanks that are located in the same area would be replaced with two smaller 250-gallon tanks allowing adequate room for placement of the larger sulfuric acid tanks.	4/26/2023	5/9/2023	CEC Non-PTA Letter for Acid Tanks MSP
16	Non-PTA	Installation of a CO2 purge system	9/27/2023	10/16/2023	Mojave Solar Project CO2 Non-PTA Letter_PDF_Final
17	Non-PTA	Installation of the lake tanks- 4 tanks at Alpha and Beta Power Block	5/25/2023	6/16/2023	1- MSP NON-PTA LETTER LAKE TANKS_Final_Signed (1) 2- NON-PTA LETTER LAKE TANKS Location Change_Final_Signed
18	Non-PTA	Installation of four PittBoss Sprayless Evaporators	11/22/2023	12/22/2023	MSP Non-PTA Letter for Sprayless Evaporators_Signed
19	PTA	Pond's Liner Extension	11/29/2023	02/29/2024-04/12/2024	Withdrawn
20	Non-PTA	Installation of an additional eight temporary lake tanks	12/19/2023	1/23/2024	NPTA Letter MSP 8 Additional Lake Tanks_signed
21	PTA	Construction of two new ponds	12/22/2023	TBD	TBD

22	Non-PTA	Revers Osmosis System upgrade to CCRO	1/8/2024	09/10/2024	NPTA Letter_ MSP CCRO_
23	Non-PTA	Lake Tank Aeration	4/18/2024	5/3/2024	WA-78_Acceptance Aeration Sys_2024-05-03
24	Non-PTA	AFFF Foam replacement	6/24/2024	7/5/2024	WA-79_Acceptance_2024-07-05
25	PTA-Addendum	Addendum to Dec 26, 2023 Petition for Modification for 2015 LGIA Agreement	9/25/2024	TBD	TBD
26	PTA	TN260764_20241220T135626_Mojave Solar Project (09-AFC-05C) Petition to Amend for OSP Shared Facilities	12/20/2024	7/31/2025	TN265190_20250731T151302_Statement of Staff Approval of Post Certification Change for Mojave Solar P
27	Non-PTA	Pump to Ponds Underground Pipe Replacment	4/10/2025	6/4/2025	MSP NON-PTA LETTER Beta Underground Discharge Pipe_signed
29	Non-PTA	Tesla EV Chargers	11/11/2025	12/9/2025	MSP NON-PTA LETTER EV CHARGERS_ADA and Signed

Other Permits\Filings

Summary of Mojave Solar's Permits:

Permit #	Description	Issuing Agency	Renewal Freq.
N011039	Permit to operate; Gasoline Dispensing Facility	Mojave Desert Air Quality Management District	Annual
C012015	Permit to operate; Alpha Carbon Absorption System	Mojave Desert Air Quality Management District	Annual
C012016	Permit to operate; Beta Carbon Absorption System	Mojave Desert Air Quality Management District	Annual
E011042	Permit to operate; Diesel IC Engine, Emergency Generator (Alpha)	Mojave Desert Air Quality Management District	Annual
E011043	Permit to operate; Diesel IC Engine, Emergency Generator (Beta)	Mojave Desert Air Quality Management District	Annual

E011044	Permit to operate; Diesel IC Engine, Fire Pump (Alpha)	Mojave Desert Air Quality Management District	Annual
E011045	Permit to operate; Diesel IC Engine, Fire Pump (Beta)	Mojave Desert Air Quality Management District	Annual
B011037	Permit to operate; Cooling Tower (Alpha)	Mojave Desert Air Quality Management District	Annual
B011038	Permit to operate; Cooling Tower (Beta)	Mojave Desert Air Quality Management District	Annual
B011046	Permit to operate; Heat Transfer Fluid (Alpha)	Mojave Desert Air Quality Management District	Annual
B011047	Permit to operate; Heat Transfer Fluid (Beta)	Mojave Desert Air Quality Management District	Annual
NONA 6B36C361721 ID 6B36NNA000226	Storm Water Permit	Lahontan Regional Water Quality Control District (LRWCQB)	N/A
CAR000242040	Hazardous Waste Generator Permit (EPA ID No.)	California Department of Toxic Substances Control (DTSC)	Annual
FEIN:451741797	EPA ID Number verification fee	(DTSC)- Website	Annual
PT0026442 PT0028858 PT0026440 PT0026441	CUPA permit	San Bernardino County Department of Toxic Substances	Annual
N/A	SBCFD annual fee	San Bernardino County Fire Department	Annual
FA0028762 FA0028763	SBC Potable Water Permit	San Bernardino County Department of Health	Annual
AR0056050 / FA0028694	Septic Permit / Sewage Holding Tank	San Bernardino County Department of Health	Annual
SCP 13623 / SPUT MB27095C-0	Wildlife Collection Permit	California Department of Fish and Wildlife and US Fish and Wildlife	Triannual / N/A
164268 and 164269	Conveyance Elevator Permit (240 per unit)	San Bernardino County Department of Health	Annual
B009812-14-14-15 Air Tanks permits	(NBVP) Pressure Vessel (Steam Drum)	National Board of Pressure Vessels (NBPV) OSHA	Annual
N/A	CEC annual fees	CEC	Annual
N/A	Watermaster Fee	Watermaster	Annual
4204	Sewage Holding Tank Permit	SBC Health	Annual

Tire Program ID 1896687-01	CA recycling program	CA recycling program	Permanent
Certificate of occupancy	Alpha Warehouse	Department of building inspection	Permanent
B009812-14	PTO Steam Boiler- Alpha A	Dep Industrial Relationship	Annual
B009813-14	PTO Steam Boiler- Alpha B	Dep Industrial Relationship	Annual
B009814-14	PTO Steam Boiler	Dep Industrial Relationship	Annual
B009815-14	PTO Steam Boiler	Dep Industrial Relationship	Annual
A010112-14	PTO Air pressure Tank- Alpha 1	Dep Industrial Relationship	Every 5 yrs.
A010114-14	PTO Air pressure Tank- Alpha 1	Dep Industrial Relationship	Every 5 yrs.
A010116-14	PTO Air pressure Tank- Alpha 1	Dep Industrial Relationship	Every 5 yrs.
A010117-14	PTO Air pressure Tank	Dep Industrial Relationship	Every 5 yrs.
A010120-14	PTO Air pressure Tank	Dep Industrial Relationship	Every 5 yrs.
A010122-14	PTO Air pressure Tank	Dep Industrial Relationship	Every 5 yrs.

COMPLIANCE-5, Compliance Matrix -Appendix B

- A compliance matrix shall be submitted by the project owner to the CPM along with each monthly and annual compliance report. The compliance matrix is intended to provide the CPM with the status of all Conditions of Certification in a spreadsheet format. The compliance matrix must identify:
  1. The technical area
  2. The Condition number
  3. A brief description of the verification action or submittal required by the Condition
  4. Date of submittal is required (e.g., 60 days prior to construction, after final inspection, etc.)
  5. The expected or actual submittal date
  6. The date a submittal or action was approved by the Chief Building Official (CBO), CPM, or
  delegate agency, if applicable; and
  7. The compliance status of each Condition, e.g., "not started," "in progress" or "completed"

(Include the date).
8. If the Condition was amended, the date of the amendment. Satisfied Conditions shall be placed at the end of the matrix.
The updated Compliance Matrix has been included, see attachment Appendix B.

COMPLIANCE-10, Complaints – Appendix C

The project owner shall report and provide copies to the CPM of all complaint forms, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations, within 10 days of receipt.
Complaints shall be logged and numbered. Noise complaints shall be recorded on the form provided in the NOISE Conditions of Certification. All other complaints shall be recorded on the complaint form located at the end of this section.

- COMP10-08-00 TN262752_zane Comments-Project External Lights
- COMP10-08-01 TN262752_zane Comments-Project External Lights-Resolution
- COMP10-09-00 Employee Complaint to CalOSHA
- COMP10-09-01 CalOSHA Inspection 1823730-Closure
- COMP10-10-00 Notice of Violation from Lahontan Regional Water Quality Control Board
- COMP10-10-01 Notice of Violation from Lahontan Regional Water Quality Control Board-Workplan Submission
- COMP10-11-00 Notice of Violation from California Public Utilities Commission
- COMP10-11-01 Closure Letter NOV- GE20240315-01

COMPLIANCE-12, On-site Contingency Plan for Unplanned Temporary Closure

plan as necessary. The CPM may require revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Energy Commission, the project owner will review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM.
On 05/4/2016, MSLLC submitted COMP12-01-00, updating sections 5.5.1, Insurance Coverage, and 5.5.2, Major Equipment Warranties, of the On-site Contingency Plan for Unplanned Temporary Closure to reflect the most current information. On December 1st, 2017, Atlantica Yield sent an email to the CEC CPM with updated insurance information for Mojave Solar LLC. CEC CPM acknowledged receipt on December 8th, 2017. Yearly updates have been submitted to the CEC along with the DMP annual report. Last one submitted on 08/05/2024, SWAT6-35-00 July 2025- Annual Detection Monitoring Program -Groundwater Monitoring Plan Report (09-

AFC-5C). No additional changes are recommended currently.

COMPLIANCE-14, Permit Modifications

See Compliance 7, Item 4. The project owner must petition the Energy Commission pursuant to Title 20, California Code of Regulations, section 1769, to modify the project (including linear facilities) design, operation, or performance requirements, and to transfer ownership or operational control of the facility. It is the responsibility of the project owner to contact the CPM to determine if a proposed project change should be considered a project modification pursuant to section 1769. Implementation of a project modification without first securing Energy Commission, or Energy Commission staff approval, may result in enforcement action that could result in civil penalties in accordance with section 25534 of the Public Resources Code.

No ownership changes occurred during the reporting period.

Petition to Amend TN260764_20241220T135626 was submitted to and approved by the California Energy Commission (CEC) for OSP Shared Facilities to allow the following:

1. Construction of a 1.1-mile, 230-kilovolt (kV) generation interconnection (gen-tie) corridor extending east across the southern portion of the Alpha block and connecting to an existing gen-tie line along the southern perimeter of the Alpha substation.
2. Use of groundwater from the Alpha-1 or Alpha-2 wells to supply OSP for construction and operational purposes. During construction, groundwater would be drawn from either well and transferred to an adjacent temporary water tank for delivery to the OSP site via water trucks.

Air Quality Permit

Air Quality permit amendment applications were submitted to MDAQMD on 10/19/2013 and approved on 02/24/2014. The approval and revised ATC were sent to CPM on 03/14/2014. CPM proposed revised conditions on 03/21/2014. On 04/22/2014, the CEC issued Order No. 14-0422-4, approving the amendments. Revised air quality permits were issued by MDAQMD on 04/28/2014. Verbiage to report all VOC emissions before January each year was added to permits C012015 and C012016 on 11/16/2022. The annual gasoline throughput for Permit N011039 was reduced from 600,000 gallons to 480,000 gallons on 10/29/2024, and updated permits were submitted to the CPM.

AQ-SC6, On Site Vehicle and Equipment Fleet Plan – Appendix D

Vehicle Fleet Plan. At least 30 days prior to the start commercial operation, the project owner shall submit to the CPM a copy of the plan that identifies the size and type of the on-site vehicle and equipment fleet and the vehicle and equipment purchase orders and contracts and/or purchase schedule. The plan shall be updated every other year and submitted in the Annual Compliance

Report. No changes to the On-Site Vehicle and Equipment Fleet Plan, submittal AQSC6-00-02, approved by the CPM on September 18, 2014. The 2026 updated fleet plan is included in Appendix D.

AQ-16, HTF Use Quantity Report -Appendix E

The inspection and maintenance plan shall be submitted to the CPM for review and approval at least 30 days before taking delivery of the HTF. As part of the Annual Compliance Report, the project owner shall provide the quantity of used HTF fluid removed from the system and the amount of new HTF fluid added to the system each year. The project owner shall make the site available for inspection of HTF piping Inspection and Maintenance Program records and HTF system equipment by representatives of the District, ARB, and the Energy Commission.
MSP purchased 10,000 gallons of heat transfer fluid (HTF) in March 2025 and an additional 10,000 gallons in November 2025. Both deliveries were distributed equally between the Alpha and Beta plants. HTF delivery documentation is included in Appendix E.

AQ-24, Cooling Tower Emission Rates – Appendix F

Cooling Tower emission calculation. The manufacturer guarantee data for the drift eliminator, showing compliance with this condition, shall be provided to the CPM and the District 30 days prior to cooling tower operation. As part of the Annual Compliance Report the project owner shall include information on operating emission rates to demonstrate compliance with this condition. The emission rate for the Cooling Towers is included in Appendix F.

AQ-34, Emergency Generator Fuel and Time of Use Records – Appendix G

The project owner shall submit records required by this condition that demonstrating compliance with the sulfur content and engine use limitations of conditions AQ-28 and AQ-30 in the Annual Compliance Report, including a photograph showing the annual reading of engine hours. Emergency diesel generator (AQ-34) and fire diesel pump (AQ-45) panel pictures, sulfur content, and engine use limitations documents are in Appendix G.

AQ-45, Diesel Fire Pump Engine Fuel and Time of Use Records – Appendix H

The project owner shall submit records required by this condition that demonstrating compliance with the sulfur content and engine use limitations of conditions AQ-42 and AQ-44, and AQ-46 in the Annual Compliance Report, including a photograph showing the annual reading of engine hours. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission. See Appendix H, as noted previously in AQ-34.

AQ-54, Gasoline Tank Annual Test – Appendix I

Gasoline tank annual test. The project owner shall notify the district at least 10 days prior to performing the required tests. The test results shall be submitted to the district within 30 days of completion of the tests and shall be made available to the CPM if requested. (VOC) Vapor Recovery system, installation and testing occurred on 04/16/2016.
The Gasoline Dispensing Tank Vapor Recovery Test results submitted to MDAQMD on 04/18/2025, please see attachment, is included as Appendix I.

AQ-58, Gasoline Tank Usage – Appendix J

The annual throughput of gasoline shall not exceed 600,000 gallons per year.
The project owner shall submit to the CPM gasoline throughput records demonstrating compliance with this condition as part of the Annual Compliance Report. The project owner shall maintain on site the annual gasoline throughput records and shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission. The annual Fuel Throughput Request for Mojave Solar Facility #3130, Company #1876, submitted to MDAQMD on January 23, 2026, is included as Appendix J.

AQ-63, 66, Carbon Adsorption System – Annual Test, Control Efficiency - Appendix K

The project owner shall notify the District and the CPM within fifteen (15) working days before the execution of the compliance test required in this condition. The initial test results shall be submitted to the district and to the CPM within 180 days of initial startup. As part of the Annual Compliance Report, the project owner shall include information demonstrating compliance with control efficiency. The AQ72-17-00 Protocol for VOC & Benzene Emissions Testing on Carbon System for Annual Test was submitted to the MDAQMD and CPM on June 4, 2025. Additionally, the AQ-72-17-01 Annual Compliance Test for VOC & Benzene Emissions, Carbon System (09-AFC-5C) 2024 was submitted to the MDAQMD and CPM on September 9, 2025. See Appendix K.

AQ-65, Carbon Adsorption System – Annual VOC emissions - Appendix K

As part of the Annual Compliance Report, the project owner shall include the test results demonstrating compliance with this condition and the project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission. The AQ72-17-00 Protocol for VOC & Benzene Emissions Testing on Carbon System for Annual Test was submitted to the MDAQMD and CPM on June 4, 2025. Additionally, the AQ-72-17-01 Annual

Compliance Test for VOC & Benzene Emissions, Carbon System (09-AFC-5C) 2024 was submitted to the MDAQMD and CPM on September 9, 2025. See Appendix K.

AQ-72, Carbon Adsorption System – Annual Test, Emissions – Appendix K

Annual VOC and Benzene emission calculation. As part of the Annual Compliance Report. the project owner shall include information demonstrating compliance with operating emission rates. The AQ72-17-00 Protocol for VOC & Benzene Emissions Testing on Carbon System for Annual Test was submitted to the MDAQMD and CPM on June 4, 2025. Additionally, the AQ-72-17-01 Annual Compliance Test for VOC & Benzene Emissions, Carbon System (09-AFC-5C) 2025 was submitted to the MDAQMD and CPM on September 9, 2025. See Appendix K.

AQ-66, Benzene Emission Limit – Appendix L

Total emissions of benzene to the atmosphere shall not exceed 507.4 lbs/year, calculated based on the most recent test results.
The 2025 annual summary of VOC emissions was reported to the Mojave Desert Air Quality Management District (MDAQMD) as part of the 2025 Mojave Solar Comprehensive Emission Inventory Report on February 12, 2026. The repost is in Appendix L.

AQ-70, Carbon Adsorption System – Annual VOC Emissions Summary - Appendix L

As part of the Annual Compliance Report. the project owner shall include the test results demonstrating compliance with this condition and the project owner shall make the site available for inspection of records by representatives of the district. ARB. and the Energy Commission.
The 2025 annual summary of VOC emissions was reported to the Mojave Desert Air Quality Management District (MDAQMD) as part of the 2025 Mojave Solar Comprehensive Emission Inventory Report on February 12, 2026. The repost is in Appendix L.

BIO-1 to BIO-21 Designated Biologist Summaries - Appendix M

During project operation, the Designated Biologist shall submit record summaries in the Annual Compliance Report unless their duties are ceased as approved by the CPM. The Biological Resources Section of the Annual Compliance Report in Appendix M addresses all Biological Resource COCs (BIO-1 to BIO-21).

HAZ-1 Hazardous Materials List - Appendix N

The project owner shall not use any hazardous materials not listed in Appendix A (Hazardous Materials Proposed for Use at AMS During Operations), below, or in greater quantities or strengths than those identified by chemical name in Appendix A, below, unless approved in

advance by the Compliance Project Manager (CPM). The project owner shall provide to the CPM, in the Annual Compliance Report, a list of hazardous materials contained at the facility.
The Facility Submittal including the Facility Information, Hazardous Materials Inventory, Emergency Response and Training Plans, Aboveground Petroleum Storage Act for Mojave Solar LLC (#10453255) Submitted on February 18, 2026.
The submittal elements are included in Appendix N.

HAZ-6, Site Security – Appendix O

At least thirty (30) days prior to the initial receipt of hazardous materials on site, the project owner shall notify the CPM that a site-specific operations site security plan is available for review and approval. In the annual compliance report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and that updated certification statements have been appended to the operations security plan. In the annual compliance report, the project owner shall include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations. Please see the attachment for the vendor and operations companies' certification statements. Appendix O.

LAND-1, Farmland Mitigation – Appendix P

The project owner shall provide a mitigation fee payment to an agricultural land trust such as the Transition Habitat Conservancy or any other land trust that has been previously approved by the Compliance Project Manager (CPM) prior to the start of construction. The fee payment will be determined by an independent appraisal conducted on available, comparable, farmland property on behalf of the agricultural land trust. The project owner shall pay all costs associated with the appraisal. The project owner shall provide documentation to the CPM that the fee has been paid and that the 128 acres of farmland and/or easements shall be purchased within three years of start of operation as compensation for the 128 acres of FMMP-designated Important Farmland to be converted by the AMS project. The documentation also shall guarantee that the land/easements purchased by the trust will be in San Bernardino County and will be available in perpetuity for productive agricultural use. If no available land or easements can be purchased in San Bernardino County, then the purchase of lands/easements in other areas within western Mojave or adjacent counties, such as Kern County or Riverside County, is acceptable. The project owner shall provide to the CPM updates in the Annual Compliance Report on the status of farmland/easement purchase(s).
This was completed in full of submittal LAND1-03-00 submitted to the CPM on January 5, 2012.
A summary for the annual report from the Transition Habitat Conservancy is in Appendix P.

Worker Safety-6, SBCFD Payments – Appendix Q

At least five (5) days before construction of permanent aboveground structures, the project owner shall provide to the CPM:

(1) A copy of the individual agreement with the SBCFD or, if the owner joins a power generation industry association, a copy of the group's bylaws and a copy of the group's agreement with the SBCFD; and evidence in each January Monthly Compliance Report that the project owner is in full compliance with the terms of such bylaws and/or agreement; or (2) A protocol, scope and schedule of work for the independent study and the qualifications of proposed contractor(s) for review and approval by the CPM; a copy of the completed study showing the precise amount the project owner shall pay for mitigation; and documentation that the amount has been paid.
Annually thereafter, the owner shall provide the CPM with verification of funding to the SBCFD if annual payments were approved or recommended under either of the above- described funding resolution options.
The SBCFD Annual O&M Contribution Verification for 2024-2025 was remitted on April 30, 2025, the proof of payment and supporting documentation provided in Appendix Q.

Worker Safety-9, Joint Training with the SBCFD – Appendix R

The project owner shall participate in joint training exercises with the SBCFD. The project owner shall coordinate this training with other Energy Commission-licensed solar power plants within San Bernardino County such that this project shall host the annual training on a rotating yearly basis with the other solar power plants.
Verification: At least 10 days prior to the start of commissioning, the project owner shall submit to the CPM proof that the joint training with the SBCFD is established and shall include the date, list of participants, training protocol, and location in the yearly compliance report to the CPM.
The San Bernardino County Fire Department was invited to participate in a joint training exercise with the MSP Emergency Response Team (ERT) on November 17, 2025. However, no response was received from the SBCFD office. The invitation email is included as Appendix R.

SOIL&WATER-1, Drainage, Erosion, and Sedimentation Control Plan (DESCP)– Appendix S

The project owner shall provide in the annual compliance report information on the results of storm water BMP monitoring and maintenance activities. The project owner shall also indicate what maintenance activities were completed to maintain the project's on-site storm water flow. Provide an analysis on the effectiveness of the drainage, erosion, and sediment control measures and the results of monitoring and maintenance activities.
The monthly inspection of channel maintenance, which is combined with stormwater inspection, is documented in Appendix S.

SOIL&WATER-3 Channel Maintenance Plan – Appendix T

As part of the AMS project Annual Compliance Report, submit an Annual Channel Maintenance Report that specifies which maintenance activities were completed during the year including type of work, location, and measure of the activity (e.g., cubic yards of

sediment removed)
No maintenance activities were required during this reporting period.

SOIL&WATER-5, Operations Water Use – Appendix U

The project owner shall prepare an annual summary report, which will include maximum daily and monthly usage in gallons per day and the total monthly and annual usage in acre-feet. Following the first year of operation, the annual summary report will summarize the annual usage in tabular form. For calculating the total water use, the term "year" will correspond to the date established for the annual compliance report submittal.
The water usage calculations and records included in Appendix U.

SOIL&WATER-10, Non- transient, Non-community Water System Permit– Appendix V

The project owner shall obtain a permit to operate a non-transient, non-community water system with the County of San Bernardino at least sixty (60) days prior to commencement of construction at the site. The project owner shall supply updates annually for all monitoring requirements and submittals to County of San Bernardino related to the permit, and proof of annual renewal of the operating permit.

All the monitoring requirements for Alpha and Beta Non- transient, Non-community Water Systems have been provided to County of San Bernardino through the online reporting websites https://sdwis.waterboards.ca.gov , https://ear.waterboards.ca.gov and via emails to San Bernardino Department of Public Health. The proof of annual renewal of the operating permit is included in appendix V.

SOIL&WATER-11, Free Production Allowance Sequestration – Appendix W

The volume of FPA sequestered shall be documented in the Annual Compliance Report submitted to the CPM and Watermaster. This documentation shall include a table showing the annual and cumulative total FPA sequestered.
The calculation of water sequestration, as well as the Mojave Basin Area Watermaster Annual Water Production Verification Letter, are provided in Appendix W.

SOIL&WATER-12, Water Conservation Program Donation – Appendix W

The project owner shall do the following:

1) The project owner shall submit to the CPM the following documentation as part of the Annual Compliance Report
   a. A copy of the receipt from the MWA for the annual contribution; and
   b. An accounting of the following:
      i. The annual and cumulative volume of groundwater used by the project in acre-feet per year.

ii. The annual and cumulative volume of FPA sequestered by the project in acre-feet per year.

iii. The numerical difference between annual and cumulative totals in Items i and ii above, and

iv. The annual and cumulative monetary contribution and estimated annual and cumulative volume of water conserved by the project owner's contribution to MWA's turf replacement program, high-efficiency toilet program, or other water conservation program approved by the CPM.

2) If the project owner proposes to reduce the amount of the annual contribution based on the water conservation achieved through previous contributions, the project owner shall provide a plan demonstrating how the adjusted amount will ensure the water conservation program meets the requirements of this condition. The plan shall be provided for CPM review and approval 60 days prior to the annual contribution anniversary date.

The donation is not required for 2025.

VIS-1, Surface Treatment of Project Structures and Buildings – Appendix X

The Project owner shall provide a status report regarding surface treatment Maintenance in the Annual Compliance Report. The report shall specify a): the condition of the surfaces of all structures and buildings at the end of the reporting year b): maintenance activities that occurred during the reporting year; and c) the schedule of maintenance activities for the next year.
MSP confirms that the condition of all structures and buildings' surfaces at the end of 2025 was satisfactory, and no corrective maintenance was required during that period.

VIS-4, Screening Fence Maintenance – Appendix X

The screening plan shall be submitted to the CPM for review and approval at least 90 days prior to installation. If the CPM determines that the plan requires revision, the project owner shall provide to the CPM a revised plan for review and approval by the CPM. The review of any subsequent revisions shall be completed by the CPM within 15 days of receipt of the revisions. The project owner shall notify the CPM within seven days after completing the screening installation that the screening is ready for inspection.
The project owner shall report maintenance activities, including replacement of or destroyed screening for the previous year of operation in each Annual Compliance Report.
The list of the maintenance activities has been included in Appendix X.

WASTE-9, Operation Waste Management Plan– Appendix Y

The project owner shall also document in each Annual Compliance Report the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed

in the original Operation Waste Management Plan; and update the Operation Waste Management Plan, as necessary, to address current waste generation and management practices.
The 2025 annual waste comparison is included in Appendix Y.

WASTE-11, Cooling Tower Basin Sludge Test Results – Appendix Y

The project owner shall report the results of filter cake testing to the CPM within 30 days of sampling. If two consecutive tests show that the sludge is non-hazardous, the project owner may apply to the CPM to discontinue testing. The test results and method and location of sludge disposal shall also be reported in the Annual Compliance Report required in Condition of Certification WASTE-9.
The results of the 2025 filter cake test can be found in Appendix Y. No cooling tower basin sludge disposal activities occurred during 2025 for reporting purposes.

Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Appendix A

Compliance 7

Annual Compliance Report delivery date agreement

From: José Manuel Bravo Romero [mailto:jmanuel.bravo@abengoa.com]
Sent: Thursday, October 27, 2016 2:53 PM
To: Rundquist, Dale@Energy
Cc: Nicholas Potrovitza; Enrique Guillen; Kathleen Sullivan; Adriana Valencia Endress; Neha Singh; Maria Elena Lopez
Subject: RE: Annual Compliance Reporting delivery date.

Then,

Can be until the end of February? Just in case.

Thank you Dale.

Best regards.
José Manuel Bravo Romero. Manager. Compliance, Quality & Environmental Department.

ABENGOA
SOLAR
Mojave Solar
42134 Harper Lake Road
Hinkley, CA 92347
Cell: (303) 378-7302
Office: (636) 519-3632 ext. 86242
jmanuel.bravo@abengoa.com

From: Rundquist, Dale@Energy [mailto:Dale.Rundquist@energy.ca.gov]
Sent: jueves, 27 de octubre de 2016 14:18
To: José Manuel Bravo Romero <jmanuel.bravo@abengoa.com>
Cc: Nicholas Potrovitza <nicholas.potrovitza@abengoa.com>; Enrique Guillen <Enrique.Guillen@atlanticayield.com>; Kathleen Sullivan <kathleen.sullivan@abengoa.com>; Adriana Valencia Endress <adriana.endress@atlanticayield.com>; Neha Singh <neha.singh1@abengoa.com>; Maria Elena Lopez <mariaelena.lopez@abengoa.com>
Subject: RE: Annual Compliance Reporting delivery date.

Hi José,
How about the first 45 days of the following reporting year? (that would make it about February 15).
The first 45 business days would extend it into March.
Would that work?
Thank you,
Dale R.

From: José Manuel Bravo Romero [mailto:jmanuel.bravo@abengoa.com]
Sent: Tuesday, October 25, 2016 10:45 AM
To: Rundquist, Dale@Energy
Cc: Nicholas Potrovitza; Enrique Guillen; Kathleen Sullivan; Adriana Valencia Endress; Neha Singh; Maria Elena Lopez
Subject: Annual Compliance Reporting delivery date.

Good morning Dale,

Following up on our conversation from last week about the Annual Compliance report delivery, we propose to deliver the ACR within the first 45 business days of the following reporting year.

Please, let us know if you agree with our proposal.

Thank you in advance.

Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Appendix B

Compliance 5

Compliance Matrix

Atlantica
Sustainable Infrastructure

Mojave Solar LLC

Document	COMPLIANCE MATRIX	By	Mahnaz Ghamati	
Project	MOJAVE SOLAR PROJECT			
Location	Harper Lake, California	Last Update	1/28/2026	

Sort code key:	Pre-Cons.	Construction	Construction & Operations	Commissioning	Operations

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
No	Accomplished	N/A	Continuous	N/A	COMPLIANCE-1	PC, CONS, COMM, OPS	Grant Site Access to CEC	The CPM, responsible Energy Commission staff, and delegated agencies or consultants shall be guaranteed and granted unrestricted access to the power plant site, related facilities, project-related staff, and the records maintained onsite, for the purpose of conducting audits, surveys, inspections, or general site visits. Although the CPM will normally schedule site visits on dates and times agreeable to the project owner, the CPM reserves the right to make unannounced visits at any time.	As required	CEC	Permitting	As Req
No	Accomplished	N/A	Continuous	N/A	COMPLIANCE-2	PC, CONS, COMM, OPS	Provide Copies on-site of all Drawings and Documents	Maintain project files on-site or at an alternative site approved by the CPM for the life of the project, unless a lesser period of time is specified by the Conditions. The files shall contain copies of all “as-built” drawings, documents submitted as verification for Conditions, and other project-related documents. Energy Commission staff and delegate agencies shall, upon request, be given unrestricted access to the files maintained pursuant to this Condition.	As required	CEC	Permitting	As Req
No	Accomplished	N/A	Continuous	N/A	COMPLIANCE-3	PC, CONS, COMM, OPS	Provide Cover Letter and Transmittal of all Coorespondance to CEC	A cover letter required for all compliance submittals and correspondence pertaining to compliance matters. The cover letter subject line shall identify the project by AFC number, the appropriate Condition(s) of Certification by Condition number(s), and a brief description of the subject of the submittal. Also identify those submittals not required by a Condition of Certification with a statement such as: “This submittal is for information only and is not required by a specific Condition of Certification.”	As required	CEC	Permitting	As Req
No	Accomplished	N/A	Continuous	N/A	COMPLIANCE-3	PC, CONS, COMM, OPS	Provide Cover Letter and Transmittal of all Resubmittals to CEC	When submitting supplementary or corrected information, reference the date of the previous submittal and CEC submittal number. The project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such Condition was satisfied by work performed by the project owner or an agent of the project owner.	As required	CEC	Permitting	As Req
No	Accomplished	N/A	Continuous	N/A	COMPLIANCE-3	PC, CONS, COMM, OPS	Provide CEC Hard Copies of any Documents as Requested	Hard copy submittals shall be accompanied by a searchable electronic copy, on a CD or by e-mail, as agreed upon by the CPM.	As required	CEC	Permitting	As Req
No	Accomplished	N/A	Continuous	N/A	COMPLIANCE-3	PC, CONS, COMM, OPS	Provide to CEC Request for Staff Action	If the project owner desires Energy Commission staff action by a specific date, that request shall be made in the submittal cover letter and shall include a detailed explanation of the effects on the project if that date is not met.	As required	CEC	Permitting	As Req
No	Accomplished	N/A	Milestone	N/A	COMPLIANCE-4	PC	Provide to CEC a Copy of Compliance Matrix	Prior to commencing construction, a compliance matrix addressing only conditions that must be fulfilled before the start of construction shall be submitted to the CPM. This matrix will be included in the first compliance submittal or prior to the first pre-construction meeting, whichever comes first. It will be submitted in the same format as the compliance matrix.	Prior to construction	CEC	Permitting	As Req
Yes	On going	N/A	Continuous	Annual	COMPLIANCE-4	PC, CONS, COMM, OPS	Provide to CEC a Copy of the MCR During Construction and the ACR During Operations	There are two different compliance reports that must be submitted to assist the CPM in tracking activities and monitoring compliance with the terms and conditions of the Energy Commission Decision. During construction, submit Monthly Compliance Reports. During operation, an Annual Compliance Report (ACR) must be submitted. These reports, and the requirement for an accompanying compliance matrix, are described below. The majority of the Conditions of Certification require that compliance submittals be submitted to the CPM in the monthly or annual compliance reports.	MCR/ACR	CEC	Permitting	As Req

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	On going	Compliance Matrix	Continuous	Annual	COMPLIANCE-5	PC, CONS, COMM, OPS	Submit Compliance Matrix to CEC	A compliance matrix shall be submitted to the CPM along with each monthly and annual compliance report.	MCR/ACR	CEC	Permitting	Monthly
No	Accomplished	N/A	Milestone	Monthly	COMPLIANCE-6	PC, CONS, COMM, OPS	Submit MCR Within 10 Working Days after End of Each Month	The first MCR is due one month following the Energy Commission business meeting date upon which the project was approved, unless otherwise agreed to by the CPM. The first MCR shall include the AFC number and an initial list of dates for each of the events identified on the Key Events List found at the end of this section of the Decision. During pre-construction and construction of the project, submit an original and an electronic searchable version of the MCR within 10 working days after the end of each reporting month. MCR shall be clearly identified for the month being reported.	10 working days after end of each month	CEC	Permitting	Monthly
Yes	On going	N/A	Continuous	Annual	COMPLIANCE-7	COMM, OPS	ACR	ACR: After construction is complete, the project owner shall submit Annual Compliance Reports instead of Monthly Compliance Reports. The reports are for each year of commercial operation and are due to the CPM each year at a date agreed to by the CPM. Annual Compliance Reports shall be submitted over the life of the project unless otherwise specified by the CPM.	Post COD - annually	CEC	Permitting	Post COD - annually
No	As required	N/A	Continuous	N/A	COMPLIANCE-8	PC, CONS, COMM, OPS	Submit Confidential Information to CEC per Title 20 Confidentiallity Regulations	Confidential Information: Any information that the project owner deems confidential shall be submitted to the Energy Commission's Executive Director with an application for confidentiality pursuant to Title 20, California Code of Regulations, section 2505(a). Any information that is determined to be confidential shall be kept confidential as provided for in Title 20, California Code of Regulations, section 2501 et. seq.	As required	CEC	Permitting	As Req
Yes	On going	N/A	Continuous	Annual	COMPLIANCE-9	PC, CONS, COMM, OPS	ASI to Pay Annual Energy Compliance Fee	Annual Energy Facility Compliance Fee: Pursuant to the provisions of section 25806(b) of the Public Resources Code, the project owner is required to pay an annual compliance fee, which is adjusted annually.	Day of Comm. Dec., Annually thereafter by July 1	CEC	ASI	As Req
No	Accomplished	N/A	Milestone	N/A	COMPLIANCE-10	PC	ASI to Notify All Residents Within 1 Mile of Project of Contact Information to Make Complaints or Address Concerns	Reporting of Complaints, Notices, and Citations: Prior to the start of construction, the project owner must send a letter to property owners living within one mile of the project notifying them of a telephone number to contact project representatives with questions, complaints or concerns. If the telephone is not staffed 24 hours per day, it shall include automatic answering with date and time stamp recording. ...The telephone number shall be posted at the project site and made easily visible to passersby during construction and operation. The telephone number shall be provided to the CPM who will post it on the Energy Commission's web page at: http://www.energy.ca.gov/sitingcases/power_plants_contacts.html Any changes to the telephone number shall be submitted immediately to the CPM, who will update the web page.	Prior to construction	CEC	Permitting	7/30/2011
Yes	As required	N/A	Continuous	N/A	COMPLIANCE-10	PC, CONS, COMM, OPS	Address All Complaints Within 24 Hours	All recorded complaints shall be responded to within 24 hours.	within 24 hours of receipt	CEC	ASI	As Req
Yes	As required	N/A	Continuous	N/A	COMPLIANCE-10	PC, CONS, COMM, OPS	Submit Any New Telephone Number to CEC Immediately	Any changes to the telephone number shall be submitted immediately to the CPM, who will update the web page.	As required	CEC	ASI	As Req
Yes	As required	N/A	Continuous	N/A	COMPLIANCE-10	PC, CONS, COMM, OPS	Provide CEC Copies of All Complaints and Violations Within 10 Days	In addition to the monthly and annual compliance reporting requirements described above, the project owner shall report and provide copies to the CPM of all complaint forms, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations, within 10 days of receipt. Complaints shall be logged and numbered. Noise complaints shall be recorded on the form provided in the NOISE Conditions of Certification. All other complaints shall be recorded on the complaint form located at the end of this section.	within 10 days of receipt	CEC	ASI	As Req

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	As required	N/A	Continuous	N/A	COMPLIANCE-11	OPS	Notify CEC 12 Months (or other agreed-upon period) of Planned Closure of Plant	Planned closure: In order to ensure that a planned facility closure does not create adverse impacts, a closure process that provides for careful consideration of available options and applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of closure, will be undertaken. To ensure adequate review of a planned project closure, the project owner shall submit a proposed facility closure plan to the Energy Commission for review and approval at least 12 months (or other period of time agreed to by the CPM) prior to commencement of closure activities. The project owner shall file 120 copies (or other number of copies agreed upon by the CPM) of a proposed facility closure plan with the Energy Commission.	12 months (or other period of time agreed to by the CPM) prior to commencement of closure activities	CEC	ASI	As Req
Yes	As required	N/A	Continuous	N/A	COMPLIANCE-11	OPS	Submit Proposed Closure Plan to CEC	Prior to submittal of the proposed facility closure plan, a meeting shall be held between the project owner and the Energy Commission CPM for the purpose of discussing the specific contents of the lan. In the event that there are significant issues associated with the proposed facility closure plan's approval, or the desires of local officials or interested parties are inconsistent with the plan, the CPM shall hold one or more workshops and/or the Energy Commission may hold public hearings as part of its approval procedure.	Prior to submittal of closure plan	CEC	ASI	As Req
No	As required	N/A	Continuous	N/A	COMPLIANCE-12	COMM	Submit Unplanned/Temp Closure and Contingency Plan to CEC	Unplanned Temporary Closure/On-Site Contingency Plan: In order to ensure that public health and safety and the environment are protected in the event of an unplanned temporary facility closure, it is essential to have an on-site contingency plan in place. The on-site contingency plan will help to ensure that all necessary steps to mitigate public health and safety impacts and environmental impacts are taken in a timely manner. The project owner shall submit an on-site contingency plan for CPM review and approval. The plan shall be submitted no less than 60 days (or other time agreed to by the CPM) prior to commencement of commercial operation. The approved plan must be in place prior to commercial operation of the facility and shall be kept at the site at all times.	60 days prior to commercial operation	CEC	ASI	
Yes	As required	N/A	Recurrent	Annual	COMPLIANCE-12	OPS	Submit Updates of Contingency Plan to CEC as Necessary	The project owner, in consultation with the CPM, will update the on-site contingency plan as necessary. The CPM may require revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Energy Commission, the project owner will review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM. The on-site contingency plan shall provide for taking immediate steps to secure the facility from trespassing or encroachment. In addition, for closures of more than 90 days, unless other arrangements are agreed to by the CPM, the plan shall provide for removal of hazardous materials and hazardous wastes, draining of all chemicals from storage tanks and other equipment, and the safe shutdown of all equipment. (Also see specific Conditions of Certification for the technical areas of Hazardous Materials Management and Waste Management.) In addition, consistent with requirements under unplanned permanent closure addressed below, the nature and extent of insurance coverage, and major equipment warranties must also be included in the on-site contingency plan. In addition, the status of the insurance coverage and major equipment warranties must be updated in the annual compliance reports.	ACR	CEC	ASI	As Req

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	As required	N/A	Milestone	N/A	COMPLIANCE-12	OPS	Notify Agencies of Unplanned/Temp Closure	In the event of an unplanned temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the circumstances and expected duration of the closure.	within 24 hours of unplanned temporary closure	CEC, SBCFD	ASI	As Req
Yes	As required	N/A	Milestone	N/A	COMPLIANCE-12	OPS	Present Permanent Closure Plan	If the CPM determines that an unplanned temporary closure is likely to be permanent, or for a duration of more than 12 months, a closure plan consistent with the requirements for a planned closure shall be developed and submitted to the CPM within 90 days of the CPM's determination (or other period of time agreed to by the CPM).	within 90 days of CPM determination	CEC	ASI	As Req
Yes	As required	N/A	Milestone	N/A	COMPLIANCE-13	OPS	Submit Proposed Closure Plan to CEC that also includes Permanent Measures	Unplanned Permanent Closure/On-Site Contingency Plan: The on-site contingency plan required for unplanned temporary closure shall also cover unplanned permanent facility closure. All of the requirements specified for unplanned temporary closure shall also apply to unplanned permanent closure. In addition, the on-site contingency plan shall address how the project owner will ensure that all required closure steps will be successfully undertaken in the event of abandonment. In the event of an unplanned permanent closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the status of all closure activities.	60 days prior to commercial operation	CEC	ASI	5/1/2014
Yes	As required	N/A	Continuous	N/A	COMPLIANCE-14	PC, CONS, COMM, OPS	Petition CEC for any Post Cert Changes per Title 20	Post Certification Changes to the Energy Commission Decision: Amendments, Ownership Changes, Staff Approved Project Modifications and Verification Changes: The project owner must petition the Energy Commission pursuant to Title 20, California Code of Regulations, section 1769, in order to modify the project (including linear facilities) design, operation or performance requirements, and to transfer ownership or operational control of the facility. It is the responsibility of the project owner to contact the CPM to determine if a proposed project change should be considered a project modification pursuant to section 1769. Implementation of a project modification without first securing Energy Commission, or Energy Commission staff approval, may result in enforcement action that could result in civil penalties in accordance with section 25534 of the Public Resources Code. (See COC)	As required	CEC	ASI	As Req
Yes	Accomplished	N/A	Milestone	N/A	AQ-SC1	PC	Provide Name of on-site AQCMM	Submit to the CPM for approval the name, resume, qualifications and contact information for the onsite AQCMM and all Delegates.	30 days prior to ground disturbance	CEC	ASI	7/29/2011
Yes	Accomplished	N/A	Milestone	N/A	AQ-SC2	PC	Provide AQCMP plan	Submit AQCMP to CPM for approval. Include effectiveness and environmental data for the proposed soil stabilizer. CPM will notify of any necessary modifications to the plan within 15 days from the date of reciept.	30 days prior to ground disturbance	CEC	ASI/CH2M	-
Yes	Accomplished	N/A	Recurrent	Monthly	AQ-SC3	CONS	Provide Any Dust Control Complaints on a Monthly Basis	Provide the CPM the following to demonstrate control of fugitive dust emissions: A summary of all actions taken to maintain compliance with this condition; Copies of any complaints filed with the District in relation to project construction; and Any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk.	MCR	CEC, AQCMM	ASI/CH2M	Monthly

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	Accomplished	N/A	Recurrent	Monthly	AQ-SC4	CONS	Provide Any Dust Control Complaints on a Monthly Basis	Provide a summary of all actions taken to maintain compliance with this condition; copies of any complaints filed with the District in relation to project construction; and any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition.	MCR	CEC, AQCMM	ASI/CH2M	As Req
Yes	N/A	N/A	Milestone	Monthly	AQ-SC5	CONS	Provide List of on-site Heavy Equipment on a Monthly Basis	Include the following to demonstrate control of diesel construction-related emissions: summary of all actions taken to control diesel construction related emissions; list of all heavy equipment used on site during that month, including the owner of that equipment and a letter from each owner indicating that equipment has been properly maintained; and any other documentation deemed necessary by the CPM or AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk.	MCR	CEC, AQCMM	ASI/CH2M	As Req
No	Accomplished	Onsite vehicle and equipment fleet Plan	Milestone	N/A	AQ-SC6	COMM	Provide Onsite Vehicle and Equipment Fleet Plan	Submit to the CPM a copy of the plan that identifies the size and type of the on-site vehicle and equipment fleet and the vehicle and equipment purchase orders and contracts and/or purchase schedule.	30 days prior to COD	CEC	ASI	6/1/2014
Yes	On going	Onsite vehicle and equipment fleet Plan	Continuous	Annual	AQ-SC6	OPS		The plan shall be updated every other year.	ACR	CEC	ASI	-
No	Accomplished	ODCP	N/A	N/A	AQ-SC7	COMM	Provide ODCP plan for Dust Control and Evironmental procedures	Submit to CPM for review and approval a copy of site ODCP that identifies the dust and erosion control procedures including effectiveness and environmental data for the proposed soil stabilizer, that will be used during operation of the project and that identifies all locations of the speed limit signs.	30 days prior to COD	CEC	ASI	6/1/2014
Yes	Accomplished	Reports of speed limits signal locations/Manual for employee and contractor training on dust and erosion control	Milestone	N/A	AQ-SC7	OPS	Provide Report Identifying Locations of all site speed limit signs	Provide CPM a report indentifying the locations of all speed limit signs and a copy of the project employee and contractor training manual that clearly identifies that project employees and contractors are required to comply with the dust and erosion control procedures and on-site speed limits.	60 days after COD	CEC	ASI	6/1/2014
Yes	As required	N/A	Continuous	N/A	AQ-SC8	CONS & OPS	Provide Federal Air Permit Modifications	Submit any ATC, PTO, and proposed federal air permit modifications to the CPM within five working days of its submittal either by 1) the project owner to an agency, or 2) receipt of proposed modifications from an agency. Submit all modified ATC/PTO documents and all federal air permits to the CPM within 15 days of reciept.	Within 5 days of its submittal or receipt	CEC	ASI/AECOM	As Req

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No	Accomplished	N/A	Milestone	N/A	AQ-SC9	PC	Provide Signed ASI Documentation that Residents were notified and offered Relocation	Provide to the CPM, a statement signed by the project owner's project manager stating that the owner or residents of the properties affected by this condition have been notified and that the residents have been offered paid relocation during the affected period of the initial grading/site preparation phase of construction. The statement shall list affected property owners/residents notified and the means of notification.	Prior to initial grading	CEC	ASI	6/30/2011
Yes	Accomplished	N/A	Recurrent	Monthly	AQ-SC9	CONS	Provide Documentation from Residents	Provide documentation regarding any requests from the residents to be relocated for longer periods during construction and the actions taken to evaluate those requests.	MCR	CEC	ASI	None received.
					Two HTF Ullage/Expansion Sysytems							
Yes	As required	Operation of Overflow and Expansion System Procedure/Temperature of HTF Records	Continuous	N/A	AQ-9	COMM/OPS	Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	HTF Ullage/Expansion System, operation: Make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
Yes	As required	Operation of Overflow and Expansion System Procedure/Records of Expansion System	Continuous	N/A	AQ-10	COMM/OPS	This system shall store only HTF in liquid and/or vapor phase (including low boilers and high boilers), and nitrogen for blanketing.	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
Yes	As required	Operation of Overflow and Expansion System Procedure/Records of the expansion tanks nitrogen blanket	Continuous	N/A	AQ-11	COMM/OPS	The four (4) vertical expansion vessels, low boiler condensate receiver vessel, and two (2) vertical HTF overflow tanks shall be operated at all times under a nitrogen blanket.	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
Yes	Accomplished	N/A	Milestone	N/A	AQ-12	CONS & OPS	The ullage/expansion system nitrogen venting shall be carried out only through District permit numbers C012015 and C012016	The project owner shall provide the District and CPM manufacturer design specifications showing compliance with this condition at least 30 days prior to the installation of the ullage/expansion vent system.	30 days prior to installation of ullage/expansion vent system	District, CEC		
No	N/A	N/A	N/A	N/A	AQ-13	CONS & OPS	Reserved					
No	N/A	N/A	N/A	N/A	AQ-14	CONS & OPS	Reserved					
No	N/A	N/A	N/A	N/A	AQ-15	CONS & OPS	Reserved					

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Yes	As required	HTF System: Inspection, Monitoring and Maintenance Plan	Continuous	N/A	AQ-16	CONS & OPS	Inspection and Maintenance Plan to include: a. All pumps, compressors and pressure relief devices (pressure relief valves or rupture disks) shall be electronically, audio, or visually inspected once every operating day. b. All accessible valves, fittings, pressure relief devices (PRDs), hatches, pumps, compressors, etc. shall be inspected quarterly using a leak detection device such as a Foxboro OVA 108 calibrated for methane. c. Inspection frequency for accessible components, except pumps, compressors and pressure relief valves, may be changed from quarterly to annual when two percent or less of the components within a component type are found to leak during an inspection for five consecutive quarters. d. Inspection frequency for accessible components, except pumps, compressors and pressure relief valves, shall be increased to quarterly when more than two percent of the components within a component type are found to leak during any inspection or report. e. If any evidence of a potential leak is found the indication of the potential leak shall be eliminated within 7 calendar days of detection. f. VOC leaks greater than 10,000-ppmv shall be repaired within 24-hours of detection.	The project owner shall establish an inspection and maintenance program to determine, repair, and log leaks in HTF piping network and expansion tanks. Inspection and maintenance program and documentation shall be available to District staff upon request. a. All pumps, compressors and pressure relief devices (pressure relief valves or rupture disks) shall be electronically, audio, or visually inspected once every operating day. b. All accessible valves, fittings, pressure relief devices (PRDs), hatches, pumps, compressors, etc. shall be inspected quarterly using a leak detection device such as a Foxboro OVA 108 calibrated for methane. c. Inspection frequency for accessible components, except pumps, compressors and pressure relief valves, may be changed from quarterly to annual when two percent or less of the components within a component type are found to leak during an inspection for five consecutive quarters. d. Inspection frequency for accessible components, except pumps, compressors and pressure relief valves, shall be increased to quarterly when more than two percent of the components within a component type are found to leak during any inspection or report. e. If any evidence of a potential leak is found the indication of the potential leak shall be eliminated within 7 calendar days of detection. f. VOC leaks greater than 10,000-ppmv shall be repaired within 24-hours of detection. g. After a repair, the component shall be re-inspected for leaks as soon as practicable, but no later than 30 days after the date on which the component is repaired and placed in service. h. The project owner shall maintain a log of all VOC leaks exceeding 10,000-ppmv, including location, component	30 days before delivery of HTF			
Yes	On going	HTF System: Inspection, Monitoring and Maintenance Plan Records	Continuous	Annual	AQ-16	OPS	HTF Log; see above	Provide the quantity of used HTF fluid removed from the system and the amount of new HTF fluid added to the system each year.	ACR	CEC		
Yes	on going	HTF System: Inspection, Monitoring and Maintenance Plan Records	Continuous	N/A	AQ-16	OPS	See above	Make the site available for inspection of HTF piping Inspection and Maintenance Program records and HTF system equipment by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
No	N/A	N/A	N/A	N/A	AQ-17	COMM	Reserved					
No	N/A	N/A	N/A	N/A	AQ-18	COMM	Reserved					
No	N/A	N/A	N/A	N/A	AQ-19	OPS	Reserved					
No	N/A	N/A	N/A	N/A	AQ-20	OPS	Reserved					
Yes	Accomplished	Toxic and hazardous substances Compliance Plan	Milestone	N/A	AQ-21	OPS	The project owner shall submit a compliance plan of the toxic or hazardous substances for District approval and CPM review if current non-criteria substances in the HTF become regulated as toxic or hazardous substances.	Toxic or Hazardous Substance Compliance Plan for Newly Regulated Materials If current non-criteria substances become regulated as toxic or hazardous substances and are used in this equipment, the project owner shall submit to the District a plan demonstrating how compliance will be achieved and maintained with such regulations.	As required	District		
					Cooling Towers							
Yes	Accomplished	Cooling Tower Startup, normal, and night-time operation Procedure	Continuous	N/A	AQ-22	OPS	Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	Make site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
Yes	Accomplished	Cooling Tower Startup, normal, and night-time operation Procedure	Continuous	N/A	AQ-23	OPS	This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.	The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
Yes	Accomplished	Cooling Tower Startup, normal, and night-time operation Procedure	Continuous	N/A	AQ-24	COMM	The drift rate shall not exceed 0.0005 percent with a maximum circulation rate of 90,000 gallons per minute. The maximum hourly PM10 emission rate shall not exceed 2.24 pounds per hour, as calculated per the written District-approved protocol.	The manufacturer guarantee data for the drift eliminator, showing compliance with this condition, shall be provided to the CPM and the District.	30 days prior to cooling tower operation	District, CEC		

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Yes	Accomplished	Cooling Tower Startup, normal, and night-time operation Procedure/Cooling Tower Operating Emissions Rate Log Records	Recurrent	Annual	AQ-24	OPS	Cooling Tower Operating Emissions Rate Log	See above: As part of the Annual Compliance Report the project owner shall include information on operating emission rates to demonstrate compliance with this condition.	ACR	CEC		
Yes	Accomplished	Cooling Tower Conductivity Test Results	Milestone/Recurrent	30 days prior to COD/Weekly/Quarterly	AQ-25	COMM & OPS	Cooling Tower Recirculation Water TDS Content Test Results- Weekly and Quarterly Logs	The total dissolved solides (TDS) from the blowdown water shall not exceed 10,000 ppm on a calendar monthly basis. To verifiy compliance, weekly TDS measurement will be performed using a Hach MP-6 portable meter (or equivalent as approved by the District). The meter must be calibrated monthly to manufacturer specifications. At least 30 days prior to the start of commercial operation, the project owner should submit to the CPM a copy of the meter sepcifications and the calibration methodology. The TDS content test results shall be provided to representatives of the District, ARB, and the Energy Commission upon request.	As required	District, ARB, CEC		
Yes	Accomplished	Cooling Tower Conductivity Test procedure	Milestone	N/A	AQ 25	COMM & OPS	Conductivity test procedure					
Yes	Accomplished	Cooling Tower Water Tests and Emissions Calculation Protocol	Recurrent	N/A	AQ-26	COMM	Cooling Tower Emissions Calculation and Water Sample Testing Protocol	The project owner shall conduct all required cooling tower water measurements in accordance with a District-approved measurement and emissions calculation protocol. Thirty (30) days prior to the first such measurement, the project owner shall provide a written measurement and emissions calculation protocol for District review and approval. The project owner shall provide an emissions calculation and water sample measurement protocol to the District for approval and CPM for review at least 30 days prior to the first cooling tower measurement.	30 days prior to cooling tower water test	District		
Yes	Accomplished	Cooling Tower Startup, normal, and night-time operation Procedure	Continuous	N/A	AQ-27	COMM/OPS		This equipment shall not be operated for more than 5,840 hours per rolling twelve month period.	ACR	CEC		
Yes	Accomplished	Cooling Tower Operating Records/Cooling Tower Water Tests and Emissions Calculation Results	Continuous	N/A	AQ-28	OPS	Cooling Tower Operating Data Log	The project owner shall maintain an operations log for this equipment on-site and current for a minimum of five (5) years, and said log shall be provided to District personnel on request. The operations log shall include the following information at a minimum: a. Total operation time (hours per day, hours per month, and hours per rolling twelve month period); and b. The date and result of each blow-down water measurement in TDS ppm, andthe resulting mass emission rate.	As required	District, ARB, CEC		
Yes	Accomplished	Cooling Tower Startup, normal, and night-time operation Procedure	Milestone	N/A	AQ-29	COMM/OPS	Cooling Tower Maintenance Procedure	A maintenance procedure shall be established that states how often and what procedures will be used to ensure the integrity of the drift eliminators. This procedure is to be kept onsite and available to District personnel on request.	As required	District		
					Two 2,280 kW Emergency IC Engine							
Yes	Accomplished	N/A	Continuous	N/A	AQ-29a	OPS	Engine Type	This engine shall be a US EPA Tier 2 certified, non-road compression ignition engine, as evidenced by the manufacturer's engine tag	As required	District, ARB, CEC		
Yes	Accomplished	Emergency Generator Installation, Operation and Maintenance Procedure	Continuous	N/A	AQ-30	OPS	Emergency Generator Operating Log, Records and External Inspection or Visit Procedure	This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.	As required	District, ARB, CEC		
Yes	Accomplished	Emergency Generator Installation, Operation and Maintenance Procedure	Milestone	Monthly	AQ-30	CONS & COMM	Evidence of installation in accordance with manufacturer specifications and sound engineering principals		As required	District, ARB, CEC		

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Yes	Accomplished	Emergency Generator Installation, Operation and Maintenance Procedure	Milestone	N/A	AQ-30	CONS & COMM	Operations and Maintenance Manual		As required	District, ARB, CEC		
Yes	Accomplished	Emergency Generator Installation, Operation and Maintenance Procedure/Fuel Purchase Records Log	Continuous	N/A	AQ-31	COMM/OPS	Fuel Purchase Records Log	This unit shall only be fired on ultra-low sulfur diesel fuel, whose sulfur concentration is less than or equal to 0.0015% (15 ppm) on a weight per weight basis per CARB Diesel or equivalent requirements. The project owner shall make the site available for inspection of equipment and fuel purchase records by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
No	Accomplished	N/A	Milestone	N/A	AQ-32	CONS	Hour Meter Specifications	A non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed and maintained on this unit to indicate elapsed engine operating time. (Title 17 CCR §93115.10(e)(1)). Provide the District and the CPM the specification of the hour meter.	30 days prior to installation of engine	District, CEC		
Yes	Accomplished	Emergency Generator Installation, Operation and Maintenance Procedure/Emergency Generator Operating Time Records	Continuous	N/A	AQ-33	OPS	Emergency Engine Use	This unit shall be limited to use for emergency power, defined as in response to a fire or when utility back-feed power is not available. In addition, this unit shall be operated no more than 0.5 hours per day and 50 hours per year for testing and maintenance, excluding compliance source testing. There is no limit on engine operation for emergency use.	As required	District, ARB, CEC		
Yes	Accomplished	Emergency Generator Operating Time Records/Emergency Generator Operating Log	Recurrent	Annual	AQ-34	OPS	Emergency Generator Operating Log, Fuel Purchase Logs, Records and External Inspection or Visit Procedure	The project owner shall maintain a operations log for this unit current and on-site, either at the engine location or at a on-site location, for a minimum of two (2) years, and for another year where it can be made available to the District staff within five (5) working days from the District's request, and this log shall be provided to District, State and Federal personnel upon request. The log shall include, at a minimum, the information specified below: a. Date of each use and duration of each use (in hours); b. Reason for use (testing & maintenance, emergency, required emission testing); c. Calendar year operation in terms of fuel consumption (in gallons) and total hours; and, d. Fuel sulfur concentration (the project owner may use the supplier's certification of sulfur content if it is maintained as part of this log). The project owner shall submit records required by this condition that demonstrating compliance with the sulfur content and engine use limitations of conditions AQ-31 and AQ-32 in the Annual Compliance Report, including a photograph showing the annual reading of engine hours. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	ACR	District, ARB, CEC		
Yes	Accomplished	N/A	Continuous	N/A	AQ-34	OPS	Records and External Inspection or Visit Procedure	Make site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
Yes	Accomplished	Emergency Generator Operating Log/Emergency Generator O&M Procedure	Continuous	N/A	AQ-35	OPS	Engine Isolation	This unit shall not be used to provide power to the interconnecting utility and shall be isolated from the interconnecting utility when operating.	As required	District, ARB, CEC		
Yes	Accomplished	Emergency Generator Operating Log/Emergency Generator O&M Procedure	Continuous	N/A	AQ-36	OPS	Outage Use	This engine may operate in response to notification of impending loss of utility back-feed power if the interconnected utility has ordered an outage to the plant or expects to order such outages at a particular time, the engine is operated no more than 30 minutes prior to the forecasted outage, and the engine is shut down immediately after the utility advises that the outage is no longer imminent or in effect.	As required	District, ARB, CEC		
No	N/A	N/A	N/A	N/A	AQ-37		Reserved					
Yes	Accomplished	N/A	Continuous	N/A	AQ-38	COMM	Stack Height	This engine shall exhaust through a stack at a minimum height of 30 feet. Records and External Inspection or Visit Procedure.	As required	District, ARB, CEC		

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Yes	Accomplished	Airborne Toxic Control Measure	Milestone	N/A	AQ-39	OPS	Airborne Toxic Control Measure (ATCM)	This unit is subject to the requirements of the Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines (Title 17 CCR 93115). In the event of conflict between these conditions and the ATCM, the more stringent shall govern. AEPC to provide ASLLC evidence or statement of conformance to the requirements of the Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines (Title 17 CCR 93115)	As required	N/A		
No	Accomplished	N/A	Milestone	N/A	AQ-40	CONS	Emergency Generator Engine Specifications	This unit is subject to the requirements of the Federal National Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60 Subpart IIII). The project owner shall submit the engine specifications at least 30 days prior to purchasing the engines for review and approval demonstrating that the engines meet NSPS and ARB ATCM emission limit requirements at the time of engine purchase.	30 days prior to purchase	CEC		
					Two 575-617 HP Emergency IC Engine							
Yes	Accomplished	N/A	Continuous	N/A	AQ-40a		Engine Type	This engine shall be a US EPA Tier 3 certified, non-road compression ignition engine, as evidenced by the manufacturer's engine tag. Records and External Inspection or Visit Procedure	As required	District, ARB, CEC		
Yes	Accomplished	Emergency IC Engine O&M Procedure	Continuous	N/A	AQ-41	COMM & OPS	Minimum Emissions	This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit. Emergency Generator Operating Log, Records and External Inspection or Visit Procedure.	As required			
Yes	Accomplished	Emergency IC Engine O&M Procedure	Milestone	N/A	AQ-42	OPS	Uultra-low sulfur diesel fuel	This unit shall only be fired on ultra-low sulfur diesel fuel, whose sulfur concentration is less than or equal to 0.0015% (15 ppm) on a weight per weight basis per CARB Diesel or equivalent requirements.	As required	District, ARB, CEC		
Yes	Accomplished	N/A	Milestone	N/A	AQ-43	OPS	Hour Meter Specifications	A non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed and maintained on this unit to indicate elapsed engine operating time. (Title 17 CCR §93115.10(e)(1)). At least thirty (30) days prior to the installation of the engine, the project owner shall provide the District and the CPM the specification of the hour timer.	30 days prior to installation of engine	District, CEC		
Yes	Accomplished	Emergency IC Engine O&M Procedure/Emergency Generator Operating Log: Direct Drive Fire Pump Operating Time	Continuous	N/A	AQ-44	OPS	Direct drive fire pump engine	This new direct drive fire pump engine shall be limited to use for emergency fire suppression, defined as in response to a fire or due to low fire water pressure. In addition, this engine shall be operated no more than 30 minutes in any one hour and no more than 10 hours per year for initial start-up testing and compliance demonstrations. Additionally, this engine shall not operate more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," (current edition). The hours of operation for source testing or to perform testing on an engine that has experienced a breakdown or failure during testing will not be counted towards either of the allowable annual limits above. There is no limit on engine operation for emergency use. [Title 17 CCR 93115.6(a)(4)] Operating Log, Records	As required	District, ARB, CEC		

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Yes	Accomplished	Emergency Generator Operating Log	Recurrent	Annual	AQ-45	OPS	Sulfur Content & Engine Use	The project owner shall maintain a operations log for this unit current and on-site, either at the engine location or at a on-site location, for a minimum of two (2) years, and for another year where it can be made available to the District staff within five (5) working days from the District's request, and this log shall be provided to District, State and Federal personnel upon request. The log shall include, at a minimum, the information specified below: a. Date of each use and duration of each use (in hours); b. Reason for use (testing & maintenance, emergency, required emission testing); c. Calendar year operation in terms of fuel consumption (in gallons) and total hours; and, d. Fuel sulfur concentration (the project owner may use the supplier's certification of sulfur content if it is maintained as part of this log). The project owner shall submit records required by this condition that demonstrating compliance with the sulfur content and engine use limitations of conditions AQ-42, AQ-44, and AQ-46 in the Annual Compliance Report, including a photograph showing the annual reading of engine hours. The project owner shall make the site available for inspection of records by representatives of the District,	ACR	CEC		
No	N/A	N/A	N/A	N/A	AQ-46	COMM & OPS	Reserved					
Yes	Accomplished	N/A	Continuous	N/A	AQ-47	COMM	Stack Height	This engine shall exhaust through a stack at a minimum height of 20 feet.	As required	District, ARB, CEC		
Yes	Accomplished	Airborne Toxic Control Measure	Continuous	N/A	AQ-48	OPS	Airborne Toxic Control Measure (ATCM)	This unit is subject to the requirements of the Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines (Title 17 CCR 93115). In the event of conflict between these conditions and the ATCM, the requirements of the ATCM shall govern.	As required	N/A		
Yes	Accomplished	N/A	Milestone	N/A	AQ-49	CONS	Engine Specifications	This unit is subject to the requirements of the Federal National Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60 Subpart IIII). The project owner shall submit the engine specifications at least 30 days prior to purchasing the engines for review and approval demonstrating that the engines meet NSPS and ARB ATCM emission limit requirements at the time of engine purchase.	30 days prior to purchase	CEC		
					AGS							
Yes	Accomplished	N/A	N/A	N/A	AQ-50	CONS	Telephone Posting.	The toll-free telephone number that must be posted is 1-800-635-4617	As required	CEC		
Yes	Accomplished	Gasoline Storage Tank Inspection and Maintenance Procedure/Gasoline Storage Tank Logs: Maintenance, Inspection, Test and Repair records	Continuous	N/A	AQ-51	OPS	Maintence, Inspection, Test and Repair Log	The project owner shall maintain a log of all inspections, repairs, and maintenance on equipment subject to Rule 461. Such logs or records shall be maintained at the facility for at least two (2) years and available to the District upon request. Records of Maintenance, Tests, Inspections, and Test Failures shall be maintained and available to District personal upon request; record form shall be similar to the Maintenance Record form indicated in current ARB E xecutive Order Rule 461	As required	District, ARB, CEC		
No	N/A	N/A	N/A	N/A	Deleted							
Yes	Accomplished	N/A	Milestone	N/A	AQ-52	CONS	Vapor Recovery System	Any modifications or changes to the piping or control fitting of the vapor recovery system require prior approval from the District. [Rule 204].	As required	District		
Yes	Accomplished	N/A	Continuous	N/A	AQ-53	CONS	Pressure Relief Valves	Pursuant to current Executive Orders (EOs) vapor vent pipes are to be equipped with pressure relief valves or allowed by EO Rule 204].	As required	CEC		

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Yes	Accomplished	N/A	Recurrent	N/A	AQ-54	COMM	Static Pressure Tests - COD	The project owner shall perform the following tests within 60 days of construction completion and annually thereafter in accord with the following test procedures: a.Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Storage Tanks shall be conducted per current ARB Executive Orders b.Phase I Adapters, Emergency Vents, Spill Container Drain Valve, Dedicated gauging port with drop tube and tank components, all connections, and fittings shall NOT have any detectable leaks; test methods shall be per current ARB Executive Orders c.Liquid Removal Test (if applicable) per TP-201.6, and Summary of Test Data shall be documented on a Form similar to the form in current ARB Executive Orders.	with in 60 construction completion	District		
Yes	Accomplished	Gasoline Storage Tank Static Pressure Tests Records	Recurrent	Annual	AQ-54	OPS	Static Pressure Tests - Annual	The project owner shall perform the following tests within 60 days of construction completion and annually thereafter in accord with the following test procedures: a.Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Storage Tanks shall be conducted per current ARB Executive Orders b.Phase I Adapters, Emergency Vents, Spill Container Drain Valve, Dedicated gauging port with drop tube and tank components, all connections, and fittings shall NOT have any detectable leaks; test methods shall be per current ARB Executive Orders c.Liquid Removal Test (if applicable) per TP-201.6, and Summary of Test Data shall be documented on a Form similar to the form in current ARB Executive Orders.	ACR	District		
Yes	Accomplished	N/A	N/A	N/A	AQ-54	OPS	Test Notification District	Notify the District prior to performing the required tests.	10 days prior to testing	District		
Yes	Accomplished	Gasoline Storage Tank Static Pressure Tests Records	Milestone	N/A	AQ-54	COMM & OPS	Test Result Submittal	The test results shall be submitted to the District after completion of the tests and shall be made available to the CPM if requested.	30 days after completion of testing	District		
Yes	Accomplished	Gasoline Storage Tank Static Pressure Tests Reports	Milestone	N/A	AQ-54	OPS	Test report	The District shall receive passing test reports no later than six (6) weeks prior to the expiration date of this permit. [Rule 204]	6 wks prior to expiration date of permit	District		
Yes	Accomplished	Gasoline Storage Tank O&M Procedure	Continuous	N/A	AQ-55	CONS & OPS	Above-ground Tank	Pursuant to California Health and Safety Code sections 39600,39601 and 41954, this aboveground tank shall be installed and maintained in accordance withcurrent ARB Executive Orders for EVR Phase I, and Standing Loss requirements Additionally, Phase II Vapor Recovery System shall be installed and maintained per current ARB Executive Orders with the exception that hanging hardware shall be EVR Balance Phase II type hanging hardware (VST or other GARB Approved EVR Phase II Hardware). [Rule 204]	As required	District, ARB, CEC		
Yes	Accomplished	EVR O&M Manual	Continuous	N/A	AQ-56	COMM & OPS	EVR Phase I OPW system components\OPW Certified Technicians	Pursuant to current ARB Executive Orders: Maintenance and repair of components, including removal and installation of such components in the course of any required tests, shall be performed by Vendor Certified Technicians.	As required	District, ARB, CEC		
No	N/A	N/A			AQ 56		List of certified service providers	DELETE - NOT A REQUIRMENT OF AQ-56				

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Yes	Accomplished	N/A	Continuous	N/A	AQ-57	OPS	Misc Maint.\OPW Certified Technicians	Pursuant to current ARB Executive Orders, Maintenance Intervals for ARB Executive Orders; Tank Gauge Components; Dust Caps Emergency Vents; Phase I Product and Vapor Adapters, and Spill Container Drain Valve, shall be conducted by an trained technician annually.	As required	District, ARB, CEC		
No	N/A	N/A	N/A	N/A	AQ-57		Technician training	Delete. See actions above				
Yes	Accomplished	GST Gasoline Use Records	Recurrent	Annual	AQ-58	OPS	Gasoline Use ACR	The annual throughput of gasoline shall not exceed 600,000 gallons per year. Throughput Records shall be kept on site and available to District personnel upon request. Before this annual throughput can be increased the facility may be required to submit to the District a site specific Health Risk Assessment in accord with a District approved plan. In addition public notice and/or comment period may be required. [Regulation XIII; Rule 204]	ACR	CEC		
Yes	Accomplished	GST Gasoline Use Records	Continuous	N/A	AQ-58	OPS	Gasoline Use - District	Maintain on site the annual gasoline throughput records and shall make the site available for inspection of records by representatives of the District.	As required	District		
Yes	Accomplished	EVR O&M Manual/EVR Operating Records	Continuous	N/A	AQ-59	CONS & OPS	EVR Phase I	The project owner shall install, maintain, and operate Enhanced Vapor Recovery (EVRI.Phase I and Phase II in compliance with current ARB Executive Orders with the exception that hanging hardware shall be EVR Balance Phase II type hanging hardware (Vapor Systems Technologies rvsn or other ARB Approved EVR Phase II Hardware). In the event of conflict between these permit conditions and/or the referenced EO's the more stringent	As required	District, ARB, CEC		
No	N/A	N/A	N/A	N/A	Deleted							
No	N/A	N/A	N/A	N/A	Deleted							
Yes	Accomplished	Gasoline Storage Tank O&M Procedure	Continuous	N/A	AQ-60	COMM & OPS	Operation Requirements	The project owner shall install, maintain, and operate this equipment in compliance with these permit conditions and 40 CFR Part 63 Subpart CCCCC; in the event of conflict the more stringent requirements shall govern. [Rule 204] The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	As required	District, ARB, CEC		
					Carbon Adsorption System							
Yes	Accomplished	Carbon Absorption System O&M Procedure	Continuous	N/A	AQ-61	COMM & OPS	Operation Requirements	Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	As necessary	District, CEC		
Yes	Accomplished	Carbon Absorption System O&M Procedure	Continuous	N/A	AQ-62	COMM & OPS	Operation Requirements	This equipment must be in use and operating properly at all times the HTF ullage/expansion system with valid District Permit B011046 and B011047 is venting.	As necessary	District		
Yes	Accomplished	Carbon Absorption System Operating Records	Milestone	N/A	AQ-63	COMM	Control Efficiency - Test Notification	This carbon adsorption system shall provide at a minimum 95% control efficiency of VOC emissions vented from the HTF ullage/expansion system under valid District Permit B011046 and B011047. Control efficiency shall be demonstrated by sampling VOC emissions per US EPA Method 25 at the inlet and outlet of the carbon beds during initial and annual compliance tests.	Within fifteen (15) working days before the execution of the compliance test	District, CEC		
Yes	Accomplished	Carbon Absorption System Operating Records	Milestone	N/A	AQ-63	COMM	Control Efficiency - Initial Test Results	This carbon adsorption system shall provide at a minimum 95% control efficiency of VOC emissions vented from the HTF ullage/expansion system under valid District Permit B011046 and B011047. Control efficiency shall be demonstrated by sampling VOC emissions per US EPA Method 25 at the inlet and outlet of the carbon beds during initial and annual compliance tests.	The initial test results shall be submitted to the District and to the CPM within 180 days of initial start up.	District, CEC		
Yes	Accomplished	Carbon Absorption System Operating Records	Recurrent	Annual	AQ-63	COMM & OPS	Control Efficiency - Annual Test Results	As part of the Annual Compliance Report, the project owner shall include information demonstrating compliance with control efficiency.	ACR	CEC		
No	N/A	N/A	N/A	N/A	Deleted							

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Yes	Accomplished	Carbon Absorption System Monitoring and Changeout Plan	Milestone	N/A	AQ-64	COMM	Monitoring and changeout plan for the carbon adsorption system	The project owner shall prepare and submit a monitoring and changeout plan for the carbon adsorption system which ensures that the system is operating at optimal control efficiency at all times for District approval 60 days prior to commercial operation date (COD). Once approved, any subsequent changes to the monitoring and change-out plan must be submitted in writing to the District for approval prior to implementation. The project owner shall provide the District for review and approval and the CPM for review the required monitoring and change-out plan within the timeframe required by this condition.	60 days prior to commercial operation date	District		
Yes	Accomplished	Carbon Absorption System O&M Procedure/Carbon Absorption System Operating Records	Recurrent	Annual	AQ-65	COMM & OPS	VOC Emission Limit	Total emissions of volatile organic compounds (VOC) to the atmosphere shall not exceed 792.1 lbs/year, calculated based on the most recent test results.	ACR	CEC		
No	N/A	N/A	N/A	N/A	Deleted							
Yes	Accomplished	Carbon Absorption System O&M Procedure/Carbon Absorption System Operating Records	Recurrent	Annual	AQ-66	COMM & OPS	Benzene Emission Limit	Total emissions of benzene to the atmosphere shall not exceed 507.4 lbs/year, calculated based on the most recent test results.	ACR	CEC		
No	N/A	N/A	N/A	N/A	Deleted							
Yes	Accomplished	Carbon Absorption System O&M Procedure/Carbon Absorption System Operating Records	Recurrent	Weekly	AQ-67	OPS	VOX Hexane\PID	During operation, the project owner shall monitor VOC (as hexane) measured at outlet from the carbon beds. Sampling is to be performed at a minimum on a weekly basis. Samples shall be analyzed using a District approved photo ionization detector (PID).	weekly	District, CEC		
Yes	Accomplished	PID Calibration Procedure	Continuous	N/A	AQ-68	OPS	PID Calibration	The photo Ionization detector shall be considered invalid if not calibrated in accordance with the manufactures recommended calibration procedures.	As necessary	District, CEC		
Yes	Accomplished	Carbon Absorption System Operating Records	Continuous	N/A	AQ-69	OPS	VOC Monitoring Logs	The project owner shall maintain an operations log (in electronic or hardcopy format) current and onsite for a period of five (5) years. The log shall contain at a minimum the following information and shall be provided to District personnel upon request. a. Date and time of VOC monitoring; b. Results of VOC monitoring; and c. Date and description of all maintenance, malfunctions, repairs, and carbon change out(s).	The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.	District, CEC		
Yes	Accomplished	Carbon Absorption System Operating Records	Recurrent	Annual	AQ-70	OPS	VOC Emission Summary - Annual	Prior to January 31 of each new year, the project owner of this unit shall submit to the District a summary report of all VOC emissions (based on annual source test results). As part of the Annual Compliance Report, the project owner shall include the test results demonstrating compliance with this condition.	ACR	CEC		

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Yes	Accomplished	N/A	Continuous	N/A	AQ-71	CONS/COM M	Stack Sampling\Port Platform	The project owner shall provide stack sampling ports and platforms necessary to perform source tests required to verify compliance with District rules, regulations and permit conditions. The location of these ports and platforms shall be subject to District approval.	As necessary	District		
Yes	Accomplished	Compliance Certification Test Plan	Milestone	N/A	AQ-72	COMM	Compliance Certification Test Plan - Protocol Submission	The project owner shall conduct all required compliance/certification tests in accordance with a District-approved test plan. Thirty (30) days prior to the compliance/certification tests the operator shall provide a written test plan for District review and approval. Written notice of the compliance/certification test shall be provided to the District ten (10) days prior to the tests so that an observer may be present. A written report with the results of such compliance/certification tests shall be submitted to the District within forty-five (45) days after testing is completed.	30 Days Prior to the Compliance /Certification Test	District, CEC		
Yes	Accomplished	N/A	Continuous	N/A	AQ-72	COMM/OPS	Compliance Certification Test Plan - Notice of Test	The project owner shall notify the District and the CPM within ten (10) working days before the execution of the compliance tests required in AQ-73 and AQ-74	10 Days prior to test	District, CEC		
Yes	Accomplished	Compliance Certification Test Plan Results	Continuous	N/A	AQ-72	COMM/OPS	Compliance Certification Test Plan - Test Results	The test results shall be submitted to the District and to the CPM within forty-five (45) days after the tests are conducted	45 Days after testing	District, CEC		
Yes	N/A	N/A	N/A	N/A	Deleted							
Yes	Accomplished	Carbon Absorption System Operating Records	Milestone	N/A	AQ-73	COMM	Hexane & Benzene Testing - COD	The project owner shall perform the following initial compliance tests on this equipment in accordance with the MDAQMD Compliance Test Procedural Manual. The test report shall be submitted to the District within 180 days of the commercial operation date (COD). The following compliance tests are required: a. VOC as hexane in ppmvd and lb/hr (measured per USEPA Reference Methods 25 and 18 or equivalent). b. Benzene in ppmvd and lb/hr (measured per ARB Method 410 or equivalent).	(30) working days before the execution of the compliance test	Compliance Test Notification		
Yes	N/A	N/A	N/A	N/A	Deleted							
Yes	Accomplished	Carbon Adsorption System Operating Records	Milestone	N/A	AQ-73	OPS	Hexane & Benzene Test Results	The test results shall be submitted to the District and to the CPM within 180 days of initial start up.	Within 180 days of initial start up.	CEC		
Yes	Accomplished	Carbon Absorption System Operating Records	Recurrent	Annual	AQ-74	OPS	Hexane & Benzene Testing - Annual	The project owner shall perform the following annual compliance tests on this equipment in accordance with the MDAQMD Compliance Test Procedural Manual. The test report shall be submitted to the District no later than six weeks prior to the expiration date of this permit. The following compliance tests are required: a. VOC as hexane in ppmvd and lb/hr (measured per US EPA Reference Methods 25A and 18 or equivalent). b. Benzene in ppmvd and lb/hr (measured per ARB Method 410 or equivalent). As part of the Annual Compliance Report, the project owner shall include information demonstrating compliance with operating emission rates.	ACR	CEC		
Yes	Accomplished	Carbon Absorption System Operating Records	Recurrent	Every 5 years	AQ-74	OPS	Hexane & Benzene Test Records	Additionally, records of all compliance tests shall be maintained on site for a period of five (5) years and presented to District personnel upon request.	Five (5) Years	District, CEC		
Yes	Accomplished	N/A	N/A	N/A	BIO-1	PC	Provide Resume of DB.	Submit the resume. The CEC, CDFG, and USFWS have 30 days to approve or deny proposed Designated Biologists. No site or related facility activities shall commence until an approved Designated biologist is available to be on site.	60 days prior to site mobilization	CEC, CDFG, USFWS	ASI	6/29/2011

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Yes	Accomplished	N/A	N/A	N/A	BIO-1	PC & CONS	Provide Resume of New DB Prior to Release of Preceding DB	If a DB needs to be replaced, the resume of the proposed replacement must be submitted to the CPM at least 10 working days prior to the termination or release of the preceding DB. In an emergency, immediately notify the CPM to discuss the qualifications and approval of a short term replacement while a permanent DB is proposed to the CPM for consideration.	10 working days	CEC	ASI	As Req.
Yes	Accomplished	N/A	N/A	N/A	BIO-2	CONS	Provide Written Reports to CEC	Submit to the CPM copies of all written reports and summaries that document biological resource compliance activities, including those conducted by Biological Monitors.	MCR	CEC	ASI	Monthly
Yes	Accomplished	N/A	N/A	N/A	BIO-2	CONS	Provide Monitors as Needed	If actions may affect biological resources during operation, a designated biologist or biological monitor under the supervision of the designated biologist shall be available for monitoring and reporting.	As required	CEC	ASI	As Req.
Yes	Accomplished	BRMIMP Records Summaries	Recurrent	Annual	BIO-2	OPS	Provide summaries to agencies.	Designated Biologist shall submit record summaries unless their duties are ceased as approved by the CEC. Reports shall also be submitted to CDFG and USFWS.	ACR	CEC, CDFG, USFWS	ASI	ACR 2014
No	Accomplished	N/A	N/A	N/A	BIO-3	PC	Submit information to agencies.	Submit the specified information to the CEC, CDFG, and USFWS for approval. The CEC, CDFG, and USFWS have 30 days to approve or deny proposed Biological Monitor(s). Submit a written statement to the CEC confirming that Biological Monitor(s) have been trained.	60 days prior to site mobilization	CEC, CDFG, USFWS	ASI	6/1/2011
No	Accomplished	N/A	Milestone	N/A	BIO-3	CONS	Submit new information to CEC.	If additional biological monitors are needed during construction, the specified information shall be submitted to the CEC for approval.	10 days prior to their first day of monitoring	CEC	ASI	As Req.
No	Accomplished	N/A	milestone	N/A	BIO-4	CONS	Notify CEC immediately of an incident.	Notify the CEC immediately (and no later than the following morning of the incident, or Monday morning in the case of a weekend) of any non-compliance or a halt of any site mobilization, ground disturbance, grading, construction, and operation activities. Also notify the CEC of the circumstances and actions being taken to resolve the problem.	Immediately as required	CEC	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	BIO-4	CONS	Notify CEC of corrective action within 5 days.	Whenever corrective action is taken, a determination of success or failure will be made by the CEC within five working days after receipt of notice that corrective action is completed, or the project owner will be notified by the CEC that coordination with other agencies will require additional time before a determination can be made.	Immediately as required	CEC	ASI	As Req.
NO	Accomplished	N/A	Milestone	N/A	BIO-5	PC	Provide the CEC a copy of the WEAP program.	Worker Environmental Awareness Program: Provide the CEC the proposed WEAP and all supporting materials prepared or reviewed by the Designated Biologist and a resume of the person(s) administering the program. The CEC shall review and provide written comments within 15 days of receipt.	45 days prior to site mobilization	CEC	ASI	6/15/2011

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No	Accomplished	N/A	Recurrent	Monthly	BIO-5	CONS	Provide the number of persons who have completed the WEAP training.	Provide the number of persons who have completed the training in the prior month and a running total of all persons who have completed the training to date.	MCR	CEC	ASI	Monthly
NO	Accomplished	N/A	Milestone	N/A	BIO-5	PC	Provide CEC approved materials list.	Prior to site and related facilities mobilization submit two copies of the CEC-approved materials.	10 days prior to site mobilization	CEC	ASI	8/19/2011
No	Accomplished	Worker Environmental Awareness Program (WEAP)/Training acknowledgment	Continuous	N/A	BIO-5	CONS, COMM & OPS	Keep signed training forms on site.	Training acknowledgement forms signed during construction shall be kept on file by the project owner for a period of at least six months after the start of commercial operation. During operation signed statements for operational personnel shall be kept on file for 6 months following termination of employment.	As required	CEC	ASI	As Req.
NO	Accomplished	N/A	Milestone	N/A	BIO-6	PC	Provide the CEC a copy of the BRMIMP plan.	Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP) Development and Compliance: Provide the specified document prior to start of any site (or related facilities) mobilization. The CEC will determine the BRMIMP's acceptability within 30 days of receipt. If there are any permits that have not yet been received when the BRMIMP is first submitted, these permits shall be submitted to the CPM within 5 days of their receipt, and the BRMIMP shall be revised or supplemented to reflect the permit condition within 10 days of their receipt by the project owner. Ten days prior to pre-construction site mobilization the revised BRMIMP shall be resubmitted to the CEC.Site mobilization will not occur without an approved BRMIMP.	45 days prior to site mobilization	CEC	ASI	6/15/2011
No	Accomplished	N/A	Recurrent	Monthly	BIO-6	CONS	Implementation of BRMIMP measures will be reported.	Implementation of BRMIMP measures will be reported.	MCR	CEC	ASI	Monthly
NO	Accomplished	N/A	milestone	N/A	BIO-6	COMM	Provide a written construction closure report to CEC.	Provide to the CEC, for review and approval, a written construction closure report identifying which items of the BRMIMP have been completed etc. (see COC)	30 days after completion of construction	CEC	ASI	As Req.
NO	Accomplished	N/A	Milestone	N/A	BIO-7	PC	Include all mitigation measures in BRMIMP.	All mitigation measures and their implementaion methods shall be included in the BRMIMP.	45 days prior to site mobilization	CEC	ASI	6/15/2011
NO	Accomplished	N/A	Milestone	N/A	BIO-7	CONS	Report measures to CEC.	Implementation of the measures will be reported. 8/17/2012 CEC Notice of Decision removed wording limiting HLR speed limit to 25mph.	MCR	CEC	ASI	Monthly
Yes	Accomplished	Construction Termination Report	Milestone	N/A	BIO-7	OPS	Provide construction termination report to CEC, CDFG and USFWS.	Provide to the CEC, for review and approval, a written construction termination report identifying how measures have been completed. Additional copies shall be provided to CDFG and USFWS.	30 days after completion of construction	CEC, CDFG, USFWS	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	BIO-8	PC	Pre-Construction Nest Surveys and Impact Avoidance and Minimization Measures for Migratory Birds: Provide the CEC a letter-report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); and a list of species observed. If active nests are detected during the survey, the report shall include a map or aerial photo identifying the location of the nest and shall depict the boundaries of the no-disturbance buffer zone around the nest. Additional copies shall be provided to CDFG and USFWS.	At least 10 days prior to the start of any pre-construction site-mobilization, the project owner shall provide the CPM a letter-report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); and a list of species observed. If active nests are detected during the survey, the report shall include a map or aerial photo identifying the location of the nest and shall depict the boundaries of the no-disturbance buffer zone around the nest. Additional copies shall be provided to CDFG and USFWS.	10 days prior to site mobilization	CEC, CDFG, USFWS	ASI	8/19/2011
No	Accomplished	N/A	Milestone	N/A	BIO-9	PC	Submit a report to the CEC, CDFG, and USFWS. This report shall document the results of the inventory and monitoring as described in Pagel et al. 2010.	Submit a report to the CEC, CDFG, and USFWS. This report shall document the results of the inventory and monitoring as described in Pagel et al. 2010.	within 30 days of completion of GOEA breeding-season surveys	CEC, CDFG, USFWS	ASI	3/1/2011
No	Accomplished	N/A	Milestone	N/A	BIO-9	PC	Submit a report to the CEC, CDFG, and USFWS. This report shall document the results of the protocol surveys as described in Pagel et al. 2010 or more recent guidance by USFWS (e.g., Pagel et al, in prep).	Submit a report to the CEC, CDFG, and USFWS. This report shall document the results of the protocol surveys as described in Pagel et al. 2010 or more recent guidance by USFWS (e.g., Pagel et al, in prep).	within 30 days of completion of GOEA non-breeding-season surveys (late-summer/early winter 2010)	CEC, CDFG, USFWS	ASI	3/1/2011

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No	Accomplished	N/A	Milestone	N/A	BIO-9	PC	Provide the CEC, CDFG, and USFWS with the final version of the Golden Eagle Territory-Specific Management Plan, based on breeding-season inventory results. This final Plan shall have been reviewed and approved by the CEC in consultation with USFWS. [or (see next entry below)]	Provide the CEC, CDFG, and USFWS with the final version of the Golden Eagle Territory-Specific Management Plan, based on breeding-season inventory results. This final Plan shall have been reviewed and approved by the CEC in consultation with USFWS. [or (see next entry below)]	30 days prior to site mobilization	CEC, CDFG, USFWS	ASI	7/292011
No	Accomplished	N/A	Milestone	N/A	BIO-9	PC	If disturbance to eagles would not occur and a Plan is not warranted, a letter from USFWS documenting this determination shall be submitted to the CEC at least 10 days prior to the start of any pre-construction site mobilization.	If disturbance to eagles would not occur and a Plan is not warranted, a letter from USFWS documenting this determination shall be submitted to the CEC at least 10 days prior to the start of any pre-construction site mobilization.	10 days prior to site mobilization	CEC, CDFG, USFWS	ASI	8/19/2011
NO	Accomplished	N/A	Milestone	N/A	BIO-9	PC	An addendum to the Plan may be required by USFWS based on non-breeding season survey results. If required, a final addendum, which has been reviewed and approved by the CEC in consultation with USFWS, shall be submitted to the CEC.	An addendum to the Plan may be required by USFWS based on non-breeding season survey results. If required, a final addendum, which has been reviewed and approved by the CEC in consultation with USFWS, shall be submitted to the CEC.	within 90 days of completion non-breeding season surveys	CEC, CDFG, USFWS	ASI	6/1/2011
No	Accomplished	N/A	Milestone	N/A	BIO-10	PC	Documentation of Bald and Golden Eagle Act Compliance: Submit to the CEC documentation that the project is in compliance with the Bald and Golden Eagle Protection Act (Title 16, United States Code, sections 668-668d). This shall include documentation from the USFWS in the form of written or electronic transmittal indicating the status of the permit, if required, and any follow up actions required by the project owner. Any additional actions shall be added to the BRMIMP and implemented.	Documentation of Bald and Golden Eagle Act Compliance: Submit to the CEC documentation that the project is in compliance with the Bald and Golden Eagle Protection Act (Title 16, United States Code, sections 668-668d). This shall include documentation from the USFWS in the form of written or electronic transmittal indicating the status of the permit, if required, and any follow up actions required by the project owner. Any additional actions shall be added to the BRMIMP and implemented.	10 days prior to site mobilization	CEC	ASI	8/19/2011
Yes	Accomplished	N/A	Milestone	N/A	BIO-11	PC	Desert Tortoise Exclusion Fencing, Clearance Surveys, and Translocation Plan: The entire project site shall be fenced with desert tortoise exclusion fence. To avoid impacts to desert tortoise during fence construction, the proposed fence alignment shall be flagged and the alignment surveyed within 24 hours prior to fence construction.	Desert Tortoise Exclusion Fencing, Clearance Surveys, and Translocation Plan: The entire project site shall be fenced with desert tortoise exclusion fence. To avoid impacts to desert tortoise during fence construction, the proposed fence alignment shall be flagged and the alignment surveyed within 24 hours prior to fence construction.	Prior to ground disturbance	CEC	Permitting	8/1/2011
No	Accomplished	N/A	Milestone	N/A	BIO-11	PC	Provide the CEC with the final version of the Desert Tortoise Translocation Plan that has been approved by the Energy Commission staff, USFWS, and CDFG. The CEC will determine the plan's acceptability within 15 working days of receipt of receipt of the final plan.	Provide the CEC with the final version of the Desert Tortoise Translocation Plan that has been approved by the Energy Commission staff, USFWS, and CDFG. The CEC will determine the plan's acceptability within 15 working days of receipt of receipt of the final plan.	45 days prior to site mobilization	CEC	ASI	6/15/2011
NO	Accomplished	N/A	Continuous	N/A	BIO-11	PC	All modifications to the approved Desert Tortoise plan must be made only after approval by the Energy Commission staff, USFWS, and CDFG.	All modifications to the approved Desert Tortoise plan must be made only after approval by the Energy Commission staff, USFWS, and CDFG.	As required	CEC, CDFG, USFWS	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	BIO-11	PC	The project owner shall notify the CEC no fewer than five working days before implementing any CEC-approved modifications to the Translocation Plan.	The project owner shall notify the CEC no fewer than five working days before implementing any CEC-approved modifications to the Translocation Plan.	5 working days before implementation	CEC	ASI	As Req.

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No	Accomplished	N/A	Milestone	N/A	BIO-11	PC	Submit report to the CEC, USFWS, and CDFG describing how each of the mitigation measures described have been satisfied. The report shall include the desert tortoise survey results, capture and release locations of any translocated desert tortoises, and any other information needed to demonstrate compliance with the measures described.	Submit report to the CEC, USFWS, and CDFG describing how each of the mitigation measures described have been satisfied. The report shall include the desert tortoise survey results, capture and release locations of any translocated desert tortoises, and any other information needed to demonstrate compliance with the measures described.	30 days of completing Desert Tortoise clearance surveys	CEC, CDFG, USFWS	ASI	
No	Accomplished	N/A	Milestone	N/A	BIO-12	PC	Mohave Ground Squirrel Clearance Surveys: Submit a report to the CEC and CDFG describing how the measures described were implemented. The report shall include the MGS survey results, capture and release locations of any relocated squirrels, and any other information needed to demonstrate compliance with the measures described. [Survey required to be conducted after the installation of the desert tortoise exclusion fence and immediately prior to any ground disturbance.]	Mohave Ground Squirrel Clearance Surveys: Submit a report to the CEC and CDFG describing how the measures described were implemented. The report shall include the MGS survey results, capture and release locations of any relocated squirrels, and any other information needed to demonstrate compliance with the measures described. [Survey required to be conducted after the installation of the desert tortoise exclusion fence and immediately prior to any ground disturbance.]	Report due within 30 days of completing MGS clearance surveys [Survey required after DT fencing, immed. prior to ground disturbance]	CEC, CDFG, USFWS	ASI	6/15/2011
No	Accomplished	N/A	Milestone	N/A	BIO-13	PC	Provide CEC and CDFG with the final version of the Burrowing Owl Monitoring and Mitigation Plan that has been reviewed and approved by the CEC in consultation with CDFG.	Provide CEC and CDFG with the final version of the Burrowing Owl Monitoring and Mitigation Plan that has been reviewed and approved by the CEC in consultation with CDFG.	45 days prior to site mobilization	CEC/CDFG	ASI	6/15/2011
No	Accomplished	N/A	Milestone	N/A	BIO-13	PC	An addendum to the plan, which includes the pre-construction survey results and the CDFG approved amount of compensatory mitigation, shall be submitted.	An addendum to the plan, which includes the pre-construction survey results and the CDFG approved amount of compensatory mitigation, shall be submitted.	10 days after completing burrowing owl surveys	CEC/CDFG	ASI	6/15/2011
No	Accomplished	N/A	Milestone	N/A	BIO-13	PC	All modifications to the approved Plan may be made by the CEC after consultation with CDFG. The project owner shall notify the CEC before implementing any CEC-approved modifications to the Burrowing Owl Monitoring and Mitigation Plan.	All modifications to the approved Plan may be made by the CEC after consultation with CDFG. The project owner shall notify the CEC before implementing any CEC-approved modifications to the Burrowing Owl Monitoring and Mitigation Plan.	5 working days before implementation	CEC/CDFG	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	BIO-14	PC	American Badger and Desert Kit Fox Impact Avoidance and Minimization Measures: Submit report to CEC and CDFG after completion of badger and kit fox surveys. The report shall describe survey methods, results, mitigation measures implemented, and the results of the measures.	American Badger and Desert Kit Fox Impact Avoidance and Minimization Measures: Submit report to CEC and CDFG after completion of badger and kit fox surveys. The report shall describe survey methods, results, mitigation measures implemented, and the results of the measures.	within 30 days of completion of surveys	CEC/CDFG	ASI	6/15/2011
No	Accomplished	N/A	Milestone	N/A	BIO-15	PC	Submit a formal acquisition proposal to the CEC, CDFG and USFWS describing the parcels intended for purchase or title/easement transfer.	Submit a formal acquisition proposal to the CEC, CDFG and USFWS describing the parcels intended for purchase or title/easement transfer.	90 days prior to acquisition of property	CEC/CDFG	ASI	6/15/2011
No	Accomplished	N/A	Milestone	N/A	BIO-15	PC	Provide written verification to the CEC that the compensation lands or conservation easements have been acquired and recorded in favor of the approved recipients.	Provide written verification to the CEC that the compensation lands or conservation easements have been aquired and recorded in favor of the approved recipients.	30 days prior to ground disturbance	CEC/CDFG	ASI	-
No	Accomplished	N/A	Milestone	N/A	BIO-15	PC, CONS	Provide CEC with a management plan for review and approval, in consultation with CDFG, for the compensation lands and associated funds.	Provide CEC with a management plan for review and approval, in consultation with CDFG, for the compensation lands and associated funds.	within 6 months of land purchase	CEC/CDFG	ASI	1/1/2011

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
No	Accomplished	N/A	Milestone	N/A	BIO-15	COMM	Provide to the CEC verification that disturbance to desert tortoise and MGS habitat did not exceed 430 acres, and that construction activities did not result in impacts to desert tortoise, MGS, and burrowing owl habitat adjacent to work areas. If habitat disturbance exceeds that described in this analysis, the CEC shall notify of any additional funds required or lands that must be purchased.	Provide to the CEC verification that disturbance to desert tortoise and MGS habitat did not exceed 430 acres, and that construction activities did not result in impacts to desert tortoise, MGS, and burrowing owl habitat adjacent to work areas. If habitat disturbance exceeds that described in this analysis, the CEC shall notify of any additional funds required or lands that must be purchased.	90 days after construction completion	CEC	ASI	As Req.
No	N/A	N/A	N/A	N/A	BIO-15	PC	If electing to use an in-lieu fee provision, request from the Energy Commission a determination that the project's in-lieu fee proposal meets CEQA and CESA requirements.	If electing to use an in-lieu fee provision, request from the Energy Commission a determination that the project's in-lieu fee proposal meets CEQA and CESA requirements.	As required	CEC	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	BIO-16	PC	Project owner shall submit to the CEC a copy of the Energy Commission staff- and CDFG-approved Tamarisk Eradication Monitoring and Reporting Plan, including success criteria.	Project owner shall submit to the CEC a copy of the Energy Commission staff- and CDFG-approved Tamarisk Eradication Monitoring and Reporting Plan, including success criteria.	30 days prior to ground disturbance	CEC	ASI	7/29/2011
Yes	On going	Tamarisk Eradication, Monitoring, and Reporting Plan/Tamarisk Eradication, Monitoring, and Reporting Plan Reports	Recurrent	Annual	BIO-16	CONS, COMM, OPS	The Designated Biologist shall submit annual reports to the CEC and CDFG describing the dates, durations and results of monitoring. Reports shall fully describe any actions taken to remedy regrowth. [Monitoring and maintenance of the site shall be conducted for five years unless less monitoring can be justified. Following the first year of monitoring, if the project owner petitions to terminate the monitoring program, staff and CDFG will determine whether more years are of monitoring are needed.]	The Designated Biologist shall submit annual reports to the CEC and CDFG describing the dates, durations and results of monitoring. Reports shall fully describe any actions taken to remedy regrowth. [Monitoring and maintenance of the site shall be conducted for five years unless less monitoring can be justified. Following the first year of monitoring, if the project owner petitions to terminate the monitoring program, staff and CDFG will determine whether more years are of monitoring are needed.]	ACR	CEC	ASI	Annually
Yes	Accomplished	N/A	Continuous	N/A	BIO-16	CONS, OPS	The CEC and CDFG shall verify compliance with protective measures to ensure the accuracy of the PO's mitigation, monitoring and reporting efforts; and review relevant documents maintained by the project owner, interview the project owner's employees and agents, inspect the work site and take other actions as necessary to assess compliance with or effectiveness of protective measures.	The CEC and CDFG shall verify compliance with protective measures to ensure the accuracy of the PO's mitigation, monitoring and reporting efforts; and review relevant documents maintained by the project owner, interview the project owner's employees and agents, inspect the work site and take other actions as necessary to assess compliance with or effectiveness of protective measures.	None	CEC, CDFG	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	BIO-17	PC	Monitoring Impacts of Solar Collection Technology on Birds: Submit to the CEC, USFWS, and CDFG a draft Bird Monitoring Study.	Monitoring Impacts of Solar Collection Technology on Birds: Submit to the CEC, USFWS, and CDFG a draft Bird Monitoring Study.	60 days prior to ground disturbance	CEC, CDFG, USFWS	ASI	
No	Accomplished	Birds Monitoring and Reporting Plan	Milestone	N/A	BIO-17	PC	Provide CEC with the final version of the Bird Monitoring Plan that has been reviewed and approved by the CEC, in consultation with CDFG and USFWS.	Provide CEC with the final version of the Bird Monitoring Plan that has been reviewed and approved by the CEC, in consultation with CDFG and USFWS.	30 days prior to ground disturbance	CEC, CDFG, USFWS	ASI	

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
No	Accomplished	Birds Monitoring and Reporting Plan/Birds Monitoring and Reporting Plan Reports	Milestone	quarterly	BIO-17	OPS	Reports to the CEC, CDFG and USFWS describing the dates, durations and results of monitoring. Reports shall provide a detailed description of any project related bird or wildlife deaths or injuries detected.	Reports to the CEC, CDFG and USFWS describing the dates, durations and results of monitoring. Reports shall provide a detailed description of any project related bird or wildlife deaths or injuries detected.	Quarterly after COD, for at least 2 years	CEC, CDFG	ASI	As Req.
Yes	Accomplished	Birds Monitoring and Reporting Plan/Birds Monitoring and Reporting Plan Reports	Milestone	Annual	BIO-17	OPS	Annual Report summarizing the year's data, analyzes any Project-related bird fatalities or injuries detected, and provides recommendations for future monitoring and any adaptive management actions needed. Provided to the CEC, CDFG, and USFWS.	Annual Report summarizing the year's data, analyzes any Project-related bird fatalities or injuries detected, and provides recommendations for future monitoring and any adaptive management actions needed. Provided to the CEC, CDFG, and USFWS.	ACR	CEC, CDFG, USFWS	ASI	As Req.
No	Accomplished	Birds Monitoring and Reporting Plan/Birds Monitoring and Reporting Plan Reports	Milestone	quarterly	BIO-17	OPS	Quarterly reports shall continue until the CEC, in consultation with CDFG and USFWS, determine whether more years of monitoring are needed, and whether mitigation and/or adaptive management measures are necessary.	Quarterly reports shall continue until the CEC, in consultation with CDFG and USFWS, determine whether more years of monitoring are needed, and whether mitigation and/or adaptive management measures are necessary.	As required	CEC, CDFG, USFWS	ASI	As Req.
No	Accomplished	Birds Study Design and Monitoring paper	Milestone	N/A	BIO-17	OPS	Prepare a paper describing the study design and monitoring results to be submitted to a peer-reviewed scientific journal. Proof of submittal provided to the CEC within one year of concluding the monitoring study.	Prepare a paper describing the study design and monitoring results to be submitted to a peer-reviewed scientific journal. Proof of submittal provided to the CEC within one year of concluding the monitoring study.	1 year after conclusion of study	CEC, CDFG, USFWS	ASI	As Req.
No	Accomplished	Common Raven Monitoring, Management, and Control Plan	Milestone	N/A	BIO-18	PC	Provide CEC, USFWS and CDFG with the final version of the Raven Management Plan that has been reviewed and approved by USFWS and CDFG. CEC shall determine the plan's acceptability within 10 days of receipt of the final plan.	Provide CEC, USFWS and CDFG with the final version of the Raven Management Plan that has been reviewed and approved by USFWS and CDFG. CEC shall determine the plan's acceptability within 10 days of receipt of the final plan.	30 days prior to ground disturbance	CEC, CDFG, USFWS	ASI	
No	Accomplished	Common Raven Monitoring, Management, and Control Plan	Milestone	N/A	BIO-18	PC, CONS, COMM, OPS	All modifications to the approved Raven Management Plan must be made only after consultation with the Energy Commission staff, USFWS, and CDFG. The project owner shall notify the CEC no less than five working days before implementing any CEC-approved modifications to the Raven Plan.	All modifications to the approved Raven Management Plan must be made only after consultation with the Energy Commission staff, USFWS, and CDFG. The project owner shall notify the CEC no less than five working days before implementing any CEC-approved modifications to the Raven Plan.	5 days prior to implementation	CEC, CDFG, USFWS	ASI	
No	Accomplished	N/A	Milestone	N/A	BIO-18	PC	Submit to the CEC verification of payment to the REAT Account to support the regional raven monitoring plan. Payment shall be included in the AMS project's land management enhancement fund, pursuant to Condition of Certification BIO-15 (5(D)).	Submit to the CEC verification of payment to the REAT Account to support the regional raven monitoring plan. Payment shall be included in the AMS project's land management enhancement fund, pursuant to Condition of Certification BIO-15 (5(D)).	Prior to ground disturbance	CEC, CDFG, USFWS	ASI	
Yes	On going	Common Raven Management Plan Implementation Reports	Recurrent	N/A	BIO-18	COMM & OPS	Provide to the CEC for review and approval a report identifying which items of the Raven Plan have been completed, a summary of all modifications to mitigation measures made during the project's construction phase, and which items are still outstanding.	Provide to the CEC for review and approval a report identifying which items of the Raven Plan have been completed, a summary of all modifications to mitigation measures made during the project's construction phase, and which items are still outstanding.	30 days after completion of construction	CEC, CDFG, USFWS	ASI	Post COC

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	Accomplished	Evaporation Pond Plan	Milestone	N/A	BIO-19	COMM & OPS	Submit a draft Evaporation Pond Monitoring and Adaptive Management plan to the CEC that incorporates the guidance in this condition.	Submit a draft Evaporation Pond Monitoring and Adaptive Management plan to the CEC that incorporates the guidance in this condition.	90 days prior to operation of evaporation ponds	CEC, CDFG, USFWS	ASI	
Yes	Accomplished	Evaporation Pond Plan	Milestone	N/A	BIO-19	COMM & OPS	Provide the CEC, USFWS, RWQCB and CDFG with the final version of the Plan that has been reviewed and approved by the CEC in consultation with USFWS, RWQCB, and CDFG.	Provide the CEC, USFWS, RWQCB and CDFG with the final version of the Plan that has been reviewed and approved by the CEC in consultation with USFWS, RWQCB, and CDFG.	30 days prior to operation of evap ponds	CEC, CDFG, USFWS	ASI	
Yes	On going	Evaporation Pond Plan	Continuous	N/A	BIO-19	OPS	Notify the CEC no less than 5 working days before implementing any CEC approved modifications to the Evaporation Pond Plan.	Notify the CEC no less than 5 working days before implementing any CEC approved modifications to the Evaporation Pond Plan.	As required	CEC, CDFG, USFWS	ASI	As Req.
Yes	N/A	N/A	Milestone	N/A	BIO-20	OPS	Provide proof, to the satisfaction of the CEC, that the alternate well is completed and able to effectively convey a minimum of 75 acre feet per year to the Harper Dry Lake Marsh. Proof shall include, but not be limited to, a description of the well parameters, as constructed.	Provide proof, to the satisfaction of the CEC, that the alternate well is completed and able to effectively convey a minimum of 75 acre feet per year to the Harper Dry Lake Marsh. Proof shall include, but not be limited to, a description of the well parameters, as constructed.	15 days prior to decomissioning well	CEC	ASI	8/15/2012
Yes	Accomplished	N/A	Milestone	N/A	BIO-21	PC	Submit USFWS Biological Opinion to CEC.	Submit to CEC copy of USFWS Biological Opinion. Verify that the permit terms and conditions of the Biological Opinion are incorporated into the BRMIMP and will be implemented.	45 days prior to site mobilization	CEC	ASI	6/15/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-1	PC	Prior to the start of ground dis	Provide resumes for CRS and alternates for approval by CEC.	45 days prior to ground disturbance	CEC	ASI	6/15/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-1	PC	CRS to provide letter to CEC.	CRS shall provide a letter naming anticipated CRMs for the project and stating that they meet the minimum requirements for cultural resource monitoring.	20 days prior to ground disturbance	CEC	CRS	8/1/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-1	PC	CRS to provide additional letters to CEC.	If additional CRMs are obtained during the project, the CRS shall provide additional letters to the CPM identifying the CRMs and attesting to the qualifications of the CRMs.	5 days prior to CRMs beginning on-site duties	CEC	CRS	8/20/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-1	PC	Provide resumes of specialist to CEC.	Resumes of specialists provided to CEC for review and approval.	10 days prior to specialists begin work	CEC	CRS	8/9/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-1	PC	Confirm to CEC in writing that CRS is available and on site.	Project owner shall confirm in writing to the CEC that the approved CRS will be available for onsite work and is prepared to implement the cultural resources conditions.	10 days prior to ground disturbance	CEC	CRS	8/9/2011

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	Accomplished	N/A	Milestone	N/A	CUL-2	PC	Provide CRS documents to CEC.	The project owner shall provide the AFC, data responses, and confidential cultural resources documents to the CRS, if needed, and the subject maps and drawings to the CRS and CPM. The CPM will review submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities.	40 days prior to ground disturbance	CEC	ASI	7/20/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-2	PC	If there are changes to any project-related footprint, revised maps and drawings shall be provided.	If there are changes to any project-related footprint, revised maps and drawings shall be provided.	15 days prior to ground disturbance	CEC	ASI	8/1/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-2	PC	If project construction is phased, if not previously provided, submit the subject maps and drawings.	If project construction is phased, if not previously provided, submit the subject maps and drawings.	15 days prior to each phase	CEC	ASI	8/1/2011
Yes	Accomplished	N/A	Recurrent	Weekly during ground disturbance	CUL-2	CONS	CRS to provide schedule to CEC.	Current schedule of anticipated project activity shall be provided to the CRS and CEC by letter, e-mail or fax.	Weekly during ground disturbance	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	CUL-2	CONS	Provide written notice of any changes.	Provide written notice of any changes to scheduling of construction phase.	within 5 days of identifying changes	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	CUL-3	PC	Submit CRMMP to CEC.	Submit the Cultural Resources Monitoring and Mitigation Plan (CRMMP) to the CEC for review and approval.	30 days prior to ground disturbance	CEC	ASI	7/29/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-3	PC	Letter provided to the CEC indicating that the owner agrees to pay curation fees for any materials collected as a result of the archaeological investigations.	Letter provided to the CEC indicating that the owner agrees to pay curation fees for any materials collected as a result of the archaeological investigations.	30 days prior to ground disturbance	CEC	ASI	7/29/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-4	CONS	Submit the Cultural Resources Report (CRR) to the CEC for review and approval. If any reports have previously been sent to the California Historical Resource Information System (CHRIS), then receipt letters from the CHRIS or other verification of receipt shall be included in an appendix.	Submit the Cultural Resources Report (CRR) to the CEC for review and approval. If any reports have previously been sent to the California Historical Resource Information System (CHRIS), then receipt letters from the CHRIS or other verification of receipt shall be included in an appendix.	90 days after completion of ground disturbance (including landscaping)	CEC	ASI Staff	10/1/2014
Yes	Accomplished	N/A	Milestone	N/A	CUL-4	CONS	Provide copy of agreement with, or other written commitment from, a curation facility that meets the standards stated in the CA State Historical Resources Commissions Guidelines for the Curation of Archeological Collections, to accept cultural materials, if any, from this project. Any agreements concerning curation will be retained and available for audit for the life of the project.	Provide copy of agreement with, or other written commitment from, a curation facility that meets the standards stated in the CA State Historical Resources Commissions Guidelines for the Curation of Archeological Collections, to accept cultural materials, if any, from this project. Any agreements concerning curation will be retained and available for audit for the life of the project.	90 days after completion of ground disturbance (including landscaping)	CEC	ASI Staff	10/1/2014
Yes	Accomplished	N/A	Milestone	N/A	CUL-4	CONS	Provide documentation to the CEC confirming that copies of the CRR have been provided to the SHPO, the CHRIS and the curating institution, if archaeological materials were collected.	Provide documentation to the CEC confirming that copies of the CRR have been provided to the SHPO, the CHRIS and the curating institution, if archaeological materials were collected.	within 10 days of CEC approval	CEC	ASI Staff	7/10/2014
Yes	Accomplished	N/A	Milestone	N/A	CUL-4	CONS	Submit a draft CRR to the CEC for review and approval.	Submit a draft CRR to the CEC for review and approval.	within 30 days after requesting a suspension of construction activities	CEC	ASI Staff	8/1/2014
Yes	Accomplished	N/A	Milestone	N/A	CUL-5	PC	The CRS shall provide the training program draft text and graphics and the informational brochure to the CEC for review and approval. The CPM will provide to the project owner a WEAP Training Acknowledgement form for each WEAP-trained worker to sign.	The CRS shall provide the training program draft text and graphics and the informational brochure to the CEC for review and approval. The CPM will provide to the project owner a WEAP Training Acknowledgement form for each WEAP-trained worker to sign.	30 days prior to ground disturbance	CEC	ASI	7/29/2011
Yes	Accomplished	N/A	Recurrent	Monthly	CUL-5	COMM	On a monthly basis, until ground disturbance is completed, the project owner shall provide in the MCR the WEAP Training Acknowledgement forms of workers at the project site and on the linear facilities who have completed training in the prior month and a running total of all persons who have completed training to date.	On a monthly basis, until ground disturbance is completed, the project owner shall provide in the MCR the WEAP Training Acknowledgement forms of workers at the project site and on the linear facilities who have completed training in the prior month and a running total of all persons who have completed training to date.	MCR	CEC	ASI Staff	Monthly
Yes	Accomplished	N/A	Milestone	N/A	CUL-6	PC	CEC will provide to the CRS an electronic copy of a form to be used as a daily monitoring log.	CEC will provide to the CRS an electronic copy of a form to be used as a daily monitoring log.	30 days prior to ground disturbance	CEC/CRS	ASI	7/29/2011
Yes	Accomplished	N/A	Recurrent	Monthly	CUL-6	CONS	While monitoring is on-going, include a copy of the monthly summary report of cultural resources-related monitoring prepared by the CRS.	While monitoring is on-going, include a copy of the monthly summary report of cultural resources-related monitoring prepared by the CRS.	MCR	CEC	ASI Staff	As Req.

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	Accomplished	N/A	Recurrent	Daily	CUL-6	CONS	Daily, as long as no cultural resources are found, the CRS shall provide a statement that “no cultural resources over 50 years of age were discovered” to the CEC as an e-mail, or in some other form acceptable to the CEC. If the CRS concludes that daily reporting is no longer necessary, a letter or e-mail providing a detailed justification for the decision to reduce or end daily reporting shall be provided to the CEC for review and approval at least 24 hours prior to reducing or ending daily reporting.	Daily, as long as no cultural resources are found, the CRS shall provide a statement that “no cultural resources over 50 years of age were discovered” to the CEC as an e-mail, or in some other form acceptable to the CEC. If the CRS concludes that daily reporting is no longer necessary, a letter or e-mail providing a detailed justification for the decision to reduce or end daily reporting shall be provided to the CEC for review and approval at least 24 hours prior to reducing or ending daily reporting.	Daily logs emailed to CEC	CEC	ASI Staff	Daily
Yes	Accomplished	N/A	Milestone	N/A	CUL-6	CONS	At least 24 hours prior to implementing a proposed change in monitoring level, documentation justifying the change shall be submitted to the CEC for review and	At least 24 hours prior to implementing a proposed change in monitoring level, documentation justifying the change shall be submitted to the CEC for review and approval.	24 hours prior to implementing a proposed change	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	CUL-6	CONS	Following the discovery of any Native American cultural materials, submit to the CEC copies of the information transmittal letters sent to the Chairperson of the Native American tribes or groups who requested the information. Additionally, submit to the CEC copies of letters of transmittal for all subsequent responses to Native American requests for notification, consultation, and reports and records and any comments or information provided in response by the Native Americans.	Following the discovery of any Native American cultural materials, submit to the CEC copies of the information transmittal letters sent to the Chairperson of the Native American tribes or groups who requested the information. Additionally, submit to the CEC copies of letters of transmittal for all subsequent responses to Native American requests for notification, consultation, and reports and records and any comments or information provided in response by the Native Americans.	30 days after discovery of Native American Artifacts	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	CUL-7	PC	Provide CEC and CRS letter to give CRM's authority to halt construction activities given a culture resource discovery is found.	Provide the CEC and CRS with a letter confirming that the CRS, alternate CRS and CRMs have the authority to halt construction activities in the vicinity of a cultural resource discovery, and that the project owner shall ensure that the CRS notifies the CEC within 24 hours of a discovery or by Monday morning if the cultural resources discovery occurs between 8:00 AM on Friday and 8:00 AM on Sunday morning.	30 days prior to ground disturbance	CEC/CRS	ASI	7/29/2011
Yes	Accomplished	N/A	Milestone	N/A	CUL-7	CONS	Submit CRS form no less than 24 hours after a cultural resource is found.	Completed DPR 523 forms for resources newly discovered during construction shall be submitted to the CEC for review and approval no later than 24 hours following the notification of the CEC, or 48 hours following the completion of data recordation/recovery, whichever the CRS decides is more appropriate for the subject cultural resource.	24 hours following the notification of the CEC.	CEC	ASI	As Req.
Yes	on going	HMB Plan/Hazardous Materials List	Recurrent	Annual	HAZ-1	OPS	Provide Hazardous Materials list to CEC.	Provide to the CEC a list of hazardous materials contained at the facility.	ACR	CEC	Permitting/ASI	As Req.
Yes	on going	HMB Plan SPCC Plan PSM Plan	Recurrent	Annual	HAZ-2	CONS/OPS	Provide a Haz Mat Business Plan, SPCC Plan and Process Safety Management Plan to SBC for comment and CEC for review.	At least 60 days prior to receiving any hazardous material on the site for commissioning or operations, the project owner shall provide a copy of a final Hazardous Materials Business Plan, Spill Prevention, Control, and Countermeasure Plan, and a Process Safety Management Plan to the CEC for approval.	60 days prior to receiving hazardous material for COMM or OPS	SBC/CEC	ASI/Permitting	12/15/2013

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	Accomplished	N/A	Continuous	N/A	HAZ-3	CONS/OPS	Provide a Safety Management Plan to the CEC.	Provide a Safety Management Plan as described to the CEC for review and approval.	60 days prior to delivery of any liquid hazardous materials to facility	CEC	ASI/Permitting	8/15/2013
Yes	Accomplished	N/A	Milestone	N/A	HAZ-4	CONS	Provide HTF Pipe Loop Drawings to CEC.	Provide the design drawings as described in COC HAZ-4 to the CPM for review and approval. [The project owner shall place an adequate number of isolation valves in the Heat transfer Fluid (HTF) pipe loops so as to be able to isolate a solar collector loop in the event of a leak of fluid.]	60 days prior to commencement of solar array construction	CEC	Permitting	4/12/2013
Yes	Accomplished	N/A	Milestone	N/A	HAZ-5	PC	Submit Site Security plan 30 days prior to construction.	Notify the CPM that a site-specific Construction Security Plan is available for review and approval.	30 days prior to construction	CEC	Permitting	4/24/2013
Yes	Accomplished	N/A	Milestone	N/A	HAZ-6	COMM	Provide the Site-specific Security plan to the CEC for review and approval.	The project owner shall notify the CEC that a site-specific operations site security plan is available for review and approval.	30 days prior to initial receipt of hazardous materials on-site	CEC	ASI/Permitting	12/15/2013
Yes	Accomplished	HMB Plan/HMB Plan Records	Recurrent	Annual	HAZ-6	COMM & OPS	Provide statement in ACR that background checks for all employees have been performed.	In the annual compliance report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and that updated certification statements have been appended to the operations security plan. In the annual compliance report, the project owner shall include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.	ACR	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	HAZ-7	CONS	Provide HTF crossing plans for Harper Lake Road to the CEC for review and approval.	Provide the design drawings as described in COC HAZ-7 to the CEC for review and approval. [The project owner shall ensure that all pipes carrying heat transfer fluid (HTF), all command and control systems, and the fire water loop that are required to cross Harper Lake Road or Lockhart Road will be placed underground for the crossing.] 12/12/2012 CEC Notice od Decision noted fire water loops need not be placed in solar field.	60 days prior to commencement of solar array piping construction	CEC	Permitting	4/9/2013
Yes	Accomplished	N/A	Milestone	N/A	LAND-1	PC	Provide conservation easement or fee title deed	Option A: The project owner shall provide to the CPM copy(-ies) of the recorded agricultural conservation easement(s) or fee title deed of protected farmland held by the approved land trust along with documentation of payment of stewardship and enforcement endowment funds to the land trust.	30 days prior to commencement of ground-disturbing activities within the 128-acre crop circle area identified for farmland mitigation.	CEC	ASI	7/29/2011
Yes	Accomplished	N/A	Milestone	N/A	LAND-1	COMM	Provide conservation easement or fee title deed with security deposit	Option B: The project owner may proceed with ground-disturbing activities within the 128-acre crop circle area identified for farmland mitigation before fully completing the required compensatory mitigation only if: - Provide security deposit sufficient to cover the estimated acquisition costs of a conservation easement or fee title purchase of farmland mitigation lands - Security deposit based on an independent appraisal conducted on available, comparable, farmland property on behalf of the agricultural land trust - Security deposit shall be held by The Community Foundation - 30 days prior to commencement of ground-disturbing activities within the 128-acre crop circle area identified for farmland mitigation.	3 years after commercial operation	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Recurrent	Annual	LAND-1	OPS	Provide CEC update of lease purchase.	Provide to the CEC updates on the status of farmland/easement purchase(s).	ACR	CEC	ASI Staff	As Req.

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	Accomplished	N/A	Milestone	N/A	LAND-2	OPS	Submit closure plan within 12 months of planned closure.	Consistent with the requirements of COMPLIANCE-11, incorporate the applicable requirements of the San Bernardino County Development Code section 84.29.060, Decommissioning Requirements, into the AMS Facility Closure Plan, to the extent feasible, and in as much as the county requirements do not conflict with the California Energy Commission's requirements and standards related to the closure of power generating facilities. Consistent with the requirements of COMPLIANCE-11, submit the Facility Closure Plan to the CEC.	12 months prior to planned closure/decommissioning	CEC/SBC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	LAND-3	PC	Submit final plat to CEC.	Submit evidence to the CEC, indicating approval of the merger of parcels by San Bernardino County, or written approval of another process that is acceptable to the county. Shall include evidence of compliance with all conditions and requirements associated with the approval of the Certificate of Merger and/or Notice of Lot Line Adjustment by the county. If all parcels or portions of parcels are not owned by the PO at the time of the merger, a separate deed shall be executed and recorded with the county recorder. A copy of the recorded deed shall be submitted to the CEC, as part of the compliance package.	30 days prior to construction	CEC/SBC	ASI	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	NOISE-1	PC	Submit to CEC statement signed by owner that notification was performed.	The project owner shall transmit to the compliance project manager (CEC) a statement, signed by the project owner's project manager, stating that the above notification has been performed, and describing the method of that notification. This communication shall also verify that the telephone number has been established and posted at the site, and shall provide that telephone number.	15 days prior to ground disturbance	CEC	ASI	6/14/2011
Yes	Accomplished	N/A	Continuous	N/A	NOISE-1	CONS & OPS	Maintain complaint phone line	Maintain Noise complaint phone line for 1 year after COD	During construction to 1 year after COD	CEC	Permitting/ASI	As Req.
Yes	Accomplished	Noise Complaints Management Procedure/Noise Complaints Records	Milestone	N/A	NOISE-2	CONS & OPS	Submit any Noise Complaint to CEC within 5 days of receipt.	The project owner shall file a Noise Complaint Resolution Form, shown below, with both the local jurisdiction and the CEC, that documents the resolution of the complaint. If mitigation is required to resolve the complaint, and the complaint is not resolved within a three-day period, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is performed and complete.	within 5 days of receiving complaint	CEC	Permitting/ASI	As Req.
Yes	Accomplished	N/A	Milestone	N/A	NOISE-3	PC	Submit Noise Control plan.	Submit the noise control program to the CEC. Make the program available to Cal-OSHA upon request.	30 days prior to ground disturbance	CEC/CAL-OSHA	Permitting/ASI	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	NOISE-4	COMM	Conduct 25 hour survey at LT-1 on a windy day.	Conduct a 25 hour survey at LT-1 on a windy day, it shall include measurement of one-third octave band sound pressure levels to ensure no new pure-tone noise components have been caused by the project.	within 90 days of project achieving sustained output >= 90% of rated capacity	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	NOISE-4	CONS & OPS	Submit summary report 30 days after completing survey	Submit a summary report to the CEC. Include a description of any additional mitigation measures necessary to achieve compliance with the listed noise limit, and a schedule for implementing these measures. When the measures are in place the survey shall be repeated.	within 30 days of completing survey	CEC	ASI Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	NOISE-4	CONS & OPS	Submit a copy of summary report to CEC.	Submit to the CEC a summary report of the new noise survey, performed as described and showing compliance with this condition.	within 30 days of completing new survey	CEC	ASI Staff	As Req.
No	N/A	N/A			NOISE-5	CONS & OPS	Conduct occupational noise survey.	The project owner shall conduct an occupational noise survey to identify any noise hazardous areas in the facility.	after achieving sustained output >= 90% of rated capacity	CEC	ASI Staff	As Req.
No	N/A	N/A			NOISE-5	CONS & OPS	Submit Noise survey to CEC.	Submit noise survey report to the CEC. Make the report available to OSHA and Cal-OSHA on request.	within 30 days of completing survey	CEC	ASI Staff	As Req.

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Yes	Accomplished	N/A	Milestone	N/A	NOISE-6	PC	Submit to CEC statement acknowledging the restrictions will be observed throughout construction.	Transmit to the CEC a statement acknowledging that the restrictions will be observed throughout the construction of the project.	Prior to ground disturbance	CEC	ASI	6/29/2011
Yes	Accomplished	N/A			NOISE-7	COMM	Notify all residents and businesses within 2 miles of the site 30 days prior to start of project.	Notify all residents and business owners within two miles of the project site. The notification may be in the form of letters, phone calls, fliers, or other effective means as approved by the CEC. The notification shall include a description of the purpose and nature of the steam blow(s), the planned schedule, expected sound levels, and explanation that it is a one-time activity and not part of normal plant operation. During steam blow activities, noise levels will be monitored at receptor locations LT-1, ST-1 and ST-2 and the results reported to the CEC.	15 days prior to the first steam blow	CEC	Permitting/ASI	
No	Accomplished	Cooling Water Management Plan	Milestone	N/A	PUBLIC HEALTH-1	COMM	Submit Cooling Water Management Plan to CEC.	The Cooling Water Management Plan shall be provided to the CPM for review and approval.	60 days prior to commencement of cooling tower operations	CEC	ASI/Permitting	5/1/2014
No	Accomplished	DESCP	Milestone	N/A	SOIL&WATER-1	PC	Prior to site mobilization, the project owner shall obtain the CPM approval for a site specific DESCP.	DESCP shall be consistent with the grading and drainage plan as required by Condition of Certification CIVIL-1 and relevant portions of the DESCP shall be submitted to the CBO for review and approval.	No later than 60 days prior to site mobilization	Submit simultaneously to the County of San Bernardino and Lahontan RWQCB no later than 60 days prior to site mobilization	Permitting	6/29/2011
No	Accomplished	DESCP	Milestone	N/A	SOIL&WATER-1	PC	Submit DESCP Plan to CEC, SBC and RWQCB	Submit a copy of the Drainage, Erosion, and Sediment Control Plan (DESCP) to the County of San Bernadino and the RWQCB for review and comment. CPM shall consider comments from county and RWQCB and approve the DESCP based upon comments as appropriate.	After review comments have been received	CPM shall consider comments from the County of San Bernardino and Lahontan RWQCB and approve the DESCP based on comments as appropriate	Permitting	6/29/2011
No	Accomplished	N/A	Recurrent	Monthly	SOIL&WATER-1	CONS	Provide SWPPP Udates in MCR.	Provide an analysis on the effectiveness of the drainage, erosion, and sediment control measures and the results of monitoring and maintenance activities.	Monthly during construction	CPM	Permitting	Monthly
Yes	Accomplished	BMP Monitoring Plan/BMP Monitoring Plan Records	Recurrent	Annual-ACR	SOIL&WATER-1	OPS	Provide SWPPP Udates to CEC.	Provide information on the results of storm water BMP monitoring and maintenance activities. Also indicate what maintenance activities were completed to maintain the project's on-site storm water flow.	Annually once operational	CEC	Permitting	Annually
Yes	Accomplished	N/A	Continuous	N/A	SOIL&WATER-1	CONS & OPS	Provide 2 Copies of SWPPP Udates to CEC.	Provide the CPM with two copies each of all monitoring or compliance reports.	As required	CEC	Permitting/ASI	As Req.

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Yes	Accomplished	Groundwater Monitoring and Reporting Plan/Evaporation Pond Closure Plan/LTU Closure Plan/Reasonable Foreseeable Release Response Plan/Bioremediation Plan/WDR's Compliance Records	Milestone	N/A	SOIL&WATER-2	CONS & OPS	The project owner shall comply with the Waste Discharge Requirements (WDR's) established in Soil and Water Resources Appendices C, D and E for the construction and operation of the surface impoundments (evaporation ponds), land treatment units, and storm water management system.	Provide documentation to the CPM, with copies to the Lahontan RWQCB, demonstrating compliance with the WDRs established in Appendices C, D, and E.	No later than 60 days prior to wastewater or stormwater discharge or use of land treatment units	Submit copies to both Lahontan RWQCB and CEC no later than 60 days prior to wastewater or stormwater discharge or use of land treatment units	Permitting/ASI	
Yes	Accomplished	WDR's Compliance Records	Milestone	N/A	SOIL&WATER-2	CONS & OPS	Submit any design changes to CEC and LRWQCB for review and approval.	Any changes to the design, construction, or operation of the ponds, treatment units, or storm water system shall be requested in writing to the CPM, with copies to the Lahontan RWQCB, and approved by the CPM, in consultation with the Lahontan RWQCB, prior to initiation of any changes.	Prior to initiation of any design, construction, or operational changes	Request in writing any changes to CEC with copies to Lahontan RWQCB	Permitting/ASI	As Req.
Yes	Accomplished	N/A	Recurrent	Annual	SOIL&WATER-2	OPS	Pay Annual Discharge Fees to LRWQCB and send a copy of receipt to CEC.	The Commission hereby delegates the enforcement of these requirements, and associated monitoring, inspection and annual fee collection authority, to the Water Boards. Accordingly, the Commission and the Water Board shall confer with each other and coordinate, as needed, in the enforcement of the requirements. The project owner shall pay the annual waste discharge permit fee associated with this facility to the Water Boards.	Annually	Pay annual fees to Lahontan RWQCB, Provide a copy of receipt to CEC	ASI	As Req.
Yes	Accomplished	WDR's Compliance Records	Continuous	N/A	SOIL&WATER-2	OPS	Provide CEC all monitoring reports with copies to RWQCB	Provide to the CPM, with copies to the Lahontan RWQCB, all monitoring reports required by the WDRs, and fully explain any violations, exceedances, enforcement actions, or corrective actions related to construction or operation of the ponds, treatment units, or storm water system.	As required	Provide a copy of any monitoring reports required by the WDR's to CEC, with a copy to Lahontan RWQCB	ASI	As Req.
Yes	Accomplished	Channel Maintenance Plan	Milestone	N/A	SOIL&WATER-3	COMM	The AMS project shall develop and implement a Channel Maintenance Program for routine maintenance of the AMS project storm water channels.	Submit to the CPM a Channel Maintenance Plan for review and approval.	60 days prior to commercial operation	Submit to CEC at least 60 days before the start of plant operations	Permitting	5/1/2014
Yes	On going	Channel Maintenance Plan	Continuous	N/A	SOIL&WATER-3	CONS & OPS	Notify CEC of any changes to Channel Maintenance Plan	Provide written notification to the CPM at least 60 days in advance of any planned changes to the Channel Maintenance Plan.	60 days prior to implementing changes to plan	Provide written notification to CPM at least 60 days in advance of any changes to the Channel Maintenance Plan	Permitting/ASI	As Req.
Yes	On going	Channel Maintenance Plan	Continuous	N/A	SOIL&WATER-3	CONS & OPS	Implement the Channel Maintenance Plan.	Implement the Channel Maintenance Plan in Item D (Channel Maintenance Plan and Reporting)	As required	CPM	Permitting/ASI	As Req.
Yes	On going	Channel Maintenance Training Records	Continuous	Annual	SOIL&WATER-3	CONS & OPS	Ensure AMS workers receive training on the Channel Maintenance Plan	Ensure that the AMS project Construction and Operations Managers receive training on the Channel Maintenance Plan.	As required	CPM	Permitting/ASI	As Req.

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Yes	On going	Annual Channel Maintenance Report	Continuous	Annual	SOIL&WATER-3	OPS	Submit Annual Channel Maintenance Report.	Submit an Annual Channel Maintenance Report that specifies which maintenance activities were completed during the year including type of work, location, and measure of the activity (e.g. cubic yards of sediment removed).	Annually	Submit to CPM an annual report indicating which maintenance activities were performed	ASI	-
Yes	Accomplished	N/A	Milestone	N/A	SOIL&WATER-4	CONS	Pre-well Installation. The project owner shall construct and operate up to two on-site groundwater wells that produce water from the Harper Valley Groundwater Basin and two backup wells.	Submit a Groundwater Monitoring and Management Plan to the County of San Bernardino for review and comment (see Condition of Certification SOIL&WATER-6).	60 days prior to construction of on-site groundwater wells	SBC	Permitting	-
Yes	Accomplished	N/A	Milestone	N/A	SOIL&WATER-4	CONS	Submit to CEC a copy of the Well Abandonment Packet.	Submit to the CPM a copy of the water well abandonment and construction packet submitted to the County of San Bernardino for review and comment.	60 days prior to the abandonment and const. of the on-site groundwater wells	Submit to CPM a copy of the water well and abandonment and construction packet submitted to County of San Bernardino no later than 60 days prior to abandonment and construction of the on-site groundwater wells	Permitting	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	SOIL&WATER-4	CONS	Submit to CEC a copy of any comments from SBC.	Submit a copy of any written comments received from the County of San Bernardino indicating whether the proposed well abandonment and construction activities comply with all county well requirements and meet the requirements established by the county's water well permit program.	30 days prior to construction of on-site water supply wells	Submit to CPM a copy of any written comments from County of San Bernardino indicating whether proposed well abandonment and construction activities comply with all county standards no later than 30 days prior to construction of on-site wells	Permitting	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	SOIL&WATER-4	CONS	Provide Well Completion Reports to CEC.	Provide to the CEC copies of the Well Completion Reports submitted to the DWR by the well driller. Submit to the CEC, together with the Well Completion Report, a copy of well drilling logs, water quality analyses, and any inspection reports.	60 days after installation of each well	Submit to CPM copies of the well completion reports submitted to CA DWR no later than 60 days after installation of each well	Permitting	
Yes	Accomplished	N/A	Milestone	N/A	SOIL&WATER-4	CONS & OPS	Submit 2 Copies of any changes to Well Construction.	Submit two (2) copies to the CPM for review and approval any proposed well construction or operation changes.	During const & op life of well	CEC	Permitting/ASI	As Req.

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Yes	Accomplished	Water Well Compliance Reports	Continuous	N/A	SOIL&WATER-4	OPS	Submit 2 Copies of all monitoring reports.	Provide the CPM with 2 copies of all monitoring and other reports required for compliance with the County of San Bernardino water well standards and operation requirements.	As required	CEC	ASI	As Req.
Yes	Accomplished	N/A	Milestone	N/A	SOIL&WATER-4	CONS	Submit Documentation to CEC confirming all drilling and disposal was per applicable LORS.	Submit documentation to the CEC confirming that well drilling activities were conducted in compliance with Title 23, California Code of Regulations, Chapter 15, Discharges of Hazardous Wastes to Land, (23 CCR, sections 2510 et seq.) requirements and that any on-site drilling sumps used for project drilling activities were removed in compliance with 23 CCR section 2511(c).	15 days after completion of wells	CEC	Permitting	
Yes	On going	N/A	Recurrent	Semi-annual- DMP	SOIL&WATER-5	OPS	The proposed project's use of groundwater for all construction and operations activities shall not exceed 2,160 acre-feet per year.	Prepare a semi-annual summary report of the amount of water used for construction purposes. The summary shall include the monthly range and monthly average of daily water usage in gallons per day.	6 months after start of construction & ea. 6 mos. of construction	CEC	Permitting	As Req.
Yes	Accomplished	N/A	Milestone	N/A	SOIL&WATER-5	PC	Submit to CEC evidence that metering devices have been installed.	Submit to the CEC a copy of evidence that metering devices have been installed and are operational.	60 days prior to start of construction	CEC	ASI	As Req.
Yes	On going	Annual Report for Water Usage	Recurrent	Annual	SOIL&WATER-5	CONS & OPS	Prepare Annual Report for Water Usage	Prepare an annual summary report, which will include the maximum daily and monthly usage in gallons per day and the total monthly and annual usage in acre-feet. Following the first year of operation, the annual summary report will summarize the annual usage in tabular form. For calculating the total water use, the term "year" will corrsepond to the date established for the ACR submittal.	ACR	CEC	ASI	Annually
Yes	On going	N/A	Continuous	N/A	SOIL&WATER-6	CONS & OPS	The project owner shall submit a Groundwater Monitoring and Reporting Plan to the CPM for review and approval.	Submit to the CPM, for review and approval, a comprehensive plan (Groundwater Level Monitoring and Reporting Plan) presenting all the data and information required in Item A1 SOIL&WATER-6.Submit to the both the CPM all calculations and assumptions made in development of the plan.	60 days prior to construction	Submit to CEC a comprehensive plan presenting all the data for well reconnaissance and well monitoring, Monitoring plan shall be submitted to CEC at least 60 days prior to construction	ASI	6/29/2011

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
Yes	Accomplished	N/A	Recurrent	Quarterly	SOIL&WATER-6	CONS	Submit Quarterly Reports to CEC on Monitoring Data.	Submit to the CPM quarterly reports presenting all the data and information required in Item A2, SOIL&WATER-6. Submit to the CPM all calculations and assumptions made in development of the report data and interpretations.	Quarterly during construction	CEC	ASI	As Req.
Yes	On going	Wells Monitoring Records	Milestone	N/A	SOIL&WATER-6	OPS	Provide CEC for review and approval documentation showing any mitigation.	Provide to the CEC, for review and approval, documentation showing that any mitigation to private well owners during project construction was satisfied, based on the requirements of the property owner as determined by the CEC.	60 days after commercial operation	CEC	ASI	As Req.
Yes	On going	Wells Monitoring Records	Recurrent	Quarterly, Bi-Annually, Annually as required	SOIL&WATER-6	OPS	Submit monitoring reports to CEC.	Submit to CEC, applicable quarterly, semi-annual, and annual reports presenting all the data and information required in Item 2C, SOIL&WATER-6. Submit to the CEC all calculations and assumptions made in development of report data and interpretations, calculations, and assumptions used in development of any reports.	Quarterly, Bi-Annually, Annually as required	CEC	ASI	As Req.
Yes	Accomplished	Wells Monitoring Records	Continuous	N/A	SOIL&WATER-6	OPS	Provide Mitigation as Described in item 2D, SOIL&WATER-6.	Provide mitigation as described in Item 2D, SOIL&WATER-6, if the CEC's inspection of the monitoring information confirms project-induced changes to water levels and water level trends relative to measured pre-project water levels, and well yield has been lowered by project pumping. The type and extent of mitigation shall be determined by the amount of water level decline and site-specific well construction and water use characteristics. The mitigation of impacts will be determined as set forth in Item 2D, SOIL&WATER-6.	As required	CEC	ASI	As Req.
Yes	As required	Wells Monitoring Records	Continuous	N/A	SOIL&WATER-6	OPS	Submit well drawdown calculations 30 days after approval of well drawdown analysis.	Submit to the CEC for review and approval all documentation and calculations describing necessary compensation for energy costs associated with additional lift requirements.	30 days after CEC approval of well drawdown analysis	CEC	ASI	As Req.
Yes	As required	Wells Monitoring Records	Continuous	N/A	SOIL&WATER-6	OPS	Submit all calculations and any letters from well owners indicating agreement with calculations.	Submit to the CEC all calculations, along with any letters signed by the well owners indicating agreement with the calculations, and the name and phone numbers of those well owners that do not agree with the calculations.	As required	CEC	ASI	As Req.
Yes	As required	N/A	Continuous	N/A	SOIL&WATER-6	OPS	Provide proof of payment for mitigation.	If mitigation includes monetary compensation, provide documentation to the CEC that compensation payments have been made by March 31 of each year of project operation or, if a lump-sum payment is made, payment shall be made by March 31 of the following year. Within 30 days after compensation is paid, submit to the CEC a compliance report describing compensation for increased energy costs necessary to comply with the provisions of this condition.	As required	CPM	ASI	As Req.
Yes	On going	Wells Monitoring Records	Continuous	Every five years	SOIL&WATER-6	OPS	Submit 5-year monitoring report after initial 5-year period and every 5-years after.	fter the first 5-year operational and monitoring period, and every subsequent 5-year period, submit a 5-year monitoring report to the CEC for review and approval. This report shall contain all monitoring data collected and provide a summary of the findings and a recommendation about whether the frequency of water level measurements should be revised or eliminated.	Every 5 years	CPM	ASI	As Req.
Yes	As required	Wells Monitoring Records	Continuous	N/A	SOIL&WATER-6	CONS & OPS	Provide CEC all monitoring reports, complaints, studies and other relevant data for life of project.	During the life of the project, provide to the CEC all monitoring reports, complaints, studies, and other relevant data.	within 10 days of receipt	CEC	ASI	As Req.

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Yes	Accomplished	Groundwater Monitoring and Reporting Plan/Groundwater Reports	Milestone	N/A	SOIL&WATER-7	PC	A water quality baseline fo pre-construction conditions shall be established for all wells in the monitoring network established by Condition of Certification SOIL&WATER-6, including all monitoring wells that are installed to comly with Waste Discharge Requirements for the evaporation ponds and land treatment unit associated with the project, the existing BLM well and any retrofitted or newly installed BLM marsh water supply well.	Groundwater Quality Monitoring and Reporting Plan in compliance with Item A shall be submitted to the CPM for review and approval.	60 days prior to construction	Submit to CEC at least 60 days prior to the start of construction	ASI	6/29/2011
Yes	N/A	N/A			SOIL&WATER-7	PC	Submit Pre-Construction Groundwater quality report 30 days prior to start of construction.	Pre-construction groundwater quality report in compliance with Item B shall be submitted to the CPM for review and approval.	30 days prior to construction	Submit to CEC at least 30 days prior to start of construction	ASI	7/29/2011
Yes	On going	Groundwater Quality Report	Continuous	Semi-annual	SOIL&WATER-7	OPS	Submit Semi-Annual Groundwater quality reports to CEC for approval and BLM for review.	Semi-annually, by March 31 and September 31, submit Groundwater Quality Reports in compliance with Item D to the CEC for review and approval and to the BLM for review.	Semi-annually	Submit semi-annually to CEC and BLM	ASI/CH2M Hill	7/29/2011
Yes	On going	Groundwater Monitoring and Reporting Plan/Groundwater Reports	Continuous	Every five years	SOIL&WATER-7	OPS	Submit 5-year monitoring report after initial 5-year period and every 5-years after.	fter the first 5-year operational and monitoring period, and every subsequent 5-year period, submit a 5-year monitoring report to the CPM, for review and approval, that contains all groundwater quality data collected and provides a summary of the findings and a recommendation about whether the frequency of groundwater quality data collection should be revised or eliminated.	Every 5 years	Submit to CEC every 5 years	ASI	As Req.
Yes	As required	Groundwater Monitoring and Reporting Plan/Groundwater Reports	Continuous	N/A	SOIL&WATER-7	CONS & OPS	Provide CEC all monitoring reports, complaints, studies and other relevant data for life of project.	During the life of the project, provide to the CEC all monitoring reports, complaints, studies, and other relevant data.	CEC	Within 10 days of receipt	ASI	As Req.
Yes	As required	Waste Management Plan/Waste Management Records	Continuous	N/A	SOIL&WATER-8	COMM & OPS	The project owner shall recycle and reuse all process wastewater streams to the extent practicable.	Prior to transport and offsite disposal of any facility operation wastewaters that are not suitable for treatment and reuse on-site, test and classify the stored wastewater to determine proper management and disposal requirements. All records of this testing and classification shall be maintain at the project site. Ensure that the wastewater is transported and disposed of in accordance with the wastewater's characteristics and classification and all applicable LORS (including any CCR Title 22 Hazardous Waste and Title 23 Waste Discharges to Land requirements).	As required	Project owner shall test any on-site soils to assess whether they are suitable or not. Project owner shall ensure that all unsuitable material is transported and disposed per the aforementioned LORS.	Permitting/ASI	As Req.
Yes	N/A	N/A			SOIL&WATER-9	COMM	Prior to the start of construction of the sanitary waste system, the project owner shall submit plans for the construction and operation of the project's proposed sanitary waste septic system and leach field.	Submit to the County of San Bernardino appropriate fees and plans for review and comment for the construction and operation of the project's sanitary waste septic system and leach field. A copy of these plans shall be simultaneously submitted to the CPM for review and approval. These plans shall demonstrate compliance with the sanitary waste disposal facility requirements of County of San Bernardino Codes Title 3, Division 3, Chapter 8, Waste Management, Article 5, Liquid Waste Disposal and Title 6, Division 3, Chapter 3, and the Uniform Plumbing Code.	60 days prior to commercial operation	Simutaneously submit to County of San Bernardino and CPM at least 60 days prior to commercial operations fees and plans for review of project's sanitary waste septic system and leach field.	Permitting	

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
No	N/A	N/A	N/A	N/A	SOIL&WATER-10	PC	The project is subject to the requirement of Title 22, Article 3, Sections 64400.80 through 64445 for a non-transient, non-community water system.	The project owner shall obtain a permit to operate a non-transient, non-community water system with the County of San Bernardino at least thirty (30) days prior to construction of the potable water treatment system. The project owner shall supply updates annually for all monitoring requirements and submittals to County of San Bernardino related to the permit, and proof of annual renewal of the operating permit.	30 days prior to construction of the potable water treatment system.	Project owner to obtain permit from County of San Bernardino to operate a non-transient, noncommunity water system at least 30 days prior to construction	Permitting	6/29/2011, 10/1/2013 Water plans
Yes	On going	Non-transient, Not-community water system monitoring plan	Continuous	Annual	SOIL&WATER-10	OPS	Supply Annual Updates of Monitoring Requirements and Proof of Annual Renewal Fee permit payment.	Supply updates annually for all monitoring requirements and submittals to County of San Bernardino related to the permit, and proof of annual renewal of the operating permit.	Annually	Submit annual monitoring reports to County of San Bernardino	ASI/Permitting	As Req.
Yes	On going	FPA Sequestered Water Records	Continuous	Annual	SOIL&WATER-11	OPS	As a conservation method, the project owner shall annually sequester a volume of Free Production Allowance (FPA) equal to the annual volume of groundwater pumped for the AMS project.	The volume of FPA sequestered shall be documented and submitted to the CPM and Watermaster. This documentation shall include a table showing the annual and cumulative total FPA sequestered.	Annually	Submit annually to Lahontan RWQCB and CEC	ASI	As Req.
Yes	As required	N/A	Continuous	Annual	SOIL&WATER-12	OPS	The project owner may be required to contribute up to $50,000 annually, for the life of the AMS project, towards the Mojave Water Agency's (MWA) turf replacement program, high-efficiency toilet program, or other water conservation programs as approved by CPM.	Submit to the CPM a copy of the receipt from the MWA for the annual contribution; and an accounting of the following: i. The annual and cumulative volume of groundwater used by the project in acre-feet per year; ii. The annual and cumulative volume of FPA sequestered by the project in acre-feet per year; iii. The numerical difference between annual and cumulative totals in Items i and ii above; and iv. The annual and cumulative monetary contribution and estimated annual and cumulative volume of water conserved by the project owner's contribution to MWA's turf replacement program, high-efficiency toilet program, or other water conservation program approved by the CPM.	Annually As required	Submit annual fee to MVA. Submit to CEC copy of receipt from MVA	ASI	As Req.
Yes	As required	N/A	Continuous	N/A	SOIL&WATER-12	OPS	The project owner may be required to contribute up to $50,000 annually, for the life of the AMS project, towards the Mojave Water Agency's (MWA) turf replacement program, high-efficiency toilet program, or other water conservation programs as approved by CPM.	If owner proposes to reduce the amount of the annual contribution based on the water conservation achieved through previous contributions, provide a plan demonstrating how the adjusted amount will ensure the water conservation program meets the requirements of this condition. The plan shall be provided for CPM review and approval 60 days prior to the annual contribution anniversary date.	60 days prior to the annual contribution anniversary date	Submit to CEC for review and approval	ASI	-
Yes	As required	N/A	Continuous	N/A	SOIL&WATER-12	OPS	The project owner may be required to contribute up to $50,000 annually, for the life of the AMS project, towards the Mojave Water Agency's (MWA) turf replacement program, high-efficiency toilet program, or other water conservation programs as approved by CPM.	If owner proposes to reduce the amount of the annual contribution based on the water conservation achieved through previous contributions, provide a plan demonstrating how the adjusted amount will ensure the water conservation program meets the requirements of this condition. The plan shall be provided for CPM review and approval 60 days prior to the annual contribution anniversary date.	60 days prior to the annual contribution anniversary date	Submit to CEC for review and approval	ASI	-
No	Accomplished	N/A	Milestone	N/A	TRANS-1	PC	Prior to site mobilization, the project owner shall secure or construct one or more park-and-ride facilities with a combined capacity of 500 spaces.	Propose new park-and-ride lot(s) to the County of San Bernardino for review and comment and the CPM for review and approval. The proposal shall include a rationale for the location of the lot(s) based upon the expected geographic distribution of employees and availability of suitable sites.	90 days prior to site mobilization	County of San Bernardino, CPM	ASI	5/29/2011

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No	N/A	N/A	Milestone	N/A	TRANS-1	PC	Inform SBC and CEC Park-and-Ride Facility is ready.	Notify the County of San Bernardino and the CPM that the park-and-ride lot(s) are ready for usage and available for inspection.	30 days prior to site mobilization	County of San Bernardino, CEC	ASI	5/29/2011
No	N/A	N/A	Milestone	N/A	TRANS-2	PC	The project owner shall develop and implement a construction traffic control plan.	Provide to the County of San Bernardino for review and comment and the CPM for review and approval a copy of the construction traffic control plan. The plan must document consultation with Caltrans.	60 days prior to site mobilization	County of San Bernardino, Caltrans, CEC	Permitting	6/29/2011
No	N/A	N/A	Milestone	N/A	TRANS-3	PC	Prior to construction, the project owner shall document the existing condition of the primary roadways that will be used by the construction workers and heavy vehicle deliveries along Harper Valley Road to SR-58 and SR-58 for 1000 feet in each direction from Harper Lake Road.	Submit a review of existing roadway pavement conditions to San Bernardino County and Caltrans for review and comment and the CPM for review and approval. This review will include photographs and the visual analysis of pavement and sub-surface conditions. The CPM will need to approve the summary of existing pavement conditions prior to commencement of construction.	90 days prior to site mobilization	County of San Bernardino, Caltrans, CEC	Permitting	6/29/2011
No	N/A	N/A	Milestone	N/A	TRANS-3	COMM	Submit Roadway Analysis report to SBC and CEC.	Submit an analysis of the roadway pavement conditions to San Bernardino County and Caltrans for review and comment and to the CPM for review and approval. The review will include photographs, the visual analysis of pavement and sub-surface conditions and a schedule for repair.	60 days after the end of construction activities	County of San Bernardino, Caltrans, CEC	Permitting	Post COD
No	N/A	N/A	Milestone	N/A	TRANS-3	COMM	Submit Roadway Analysis report to SBC and CEC.	Submit a letter to San Bernardino County, Caltrans, and the CPM indicating such repairs are finished and ready for inspection.	After completion of repairs	County of San Bernardino, Caltrans, CEC	Permitting	Post COD
No	N/A	N/A	Milestone	N/A	TRANS-4	PC	During construction, the project owner will stagger the employee start times and delivery times so as not to overload the existing highway traffic.	Include these restrictions in the construction traffic control plan required by TRANS-2	60 days prior to site mobilization	County of San Bernardino, Caltrans, CEC	Permitting	6/29/2011
Yes	Accomplished	Waste Management Plan	Continuous	N/A	TRANS-5	COMM & OPS	The project owner shall not allow hazardous materials deliveries during non-daylight hours.	A record of hazardous deliveries shall be provided to the CPM as required in HAZ-3.	As required	CEC	ASI/Permitting	As Req.
No	N/A	N/A	milestone	N/A	TLSN-1	CONS	Submit Signed Letter to CEC	Submit to the CPM a letter signed by a California registered electrical engineer affirming that the lines will be constructed according to the requirements stated in the condition.	30 days prior to construction of transmission line or related structures and facilities	CEC	Electrical/Permitting	8/5/2011
Yes	Accomplished	N/A	milestone	Annual	TLSN-2	OPS	Submit All Line Related Complaint Records	All reports of line-related complaints shall be summarized for the project-related lines and included during the first five years of plant operation in the Annual Compliance Report.	ACR, for first 5 years of operation	CEC	ASI	As Req.
No	N/A	N/A	Milestone	N/A	TLSN-3	CONS	File Energization Measurements	File copies of the pre-and post-energization measurements with the CPM after completion of the measurements.	60 days after completion of the measurements	CEC	Electrical	
No	Accomplished	N/A	Recurrent	Annual	TLSN-4	OPS	Submit Inspection Results and Fire Prevention Activities	During the first five years of operation, the project owner shall provide a summary of inspection results and any fire prevention activities carried out along the rights-of-way and provide such summaries in the ACR for transmission line safety and nuisance-related requirements.	ACR, for first 5 years of operation	CEC	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	TLSN-5	COMM & OPS	Ground All Metallic Objects Within Transmission Line Right-of-Way	The project owner shall ensure that all permanent metallic objects within the right-of-way of the project-related lines are grounded according to industry standards regardless of ownership. Transmit to the CPM a letter confirming compliance with this condition.	30 days before lines are energized	CEC	Electrical/Field	10/1/2013

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Yes	Accomplished	N/A	Milestone	N/A	VIS-1	PC	Vendor Colors of All Structures To Be Provided to CEC	At least 90 days prior to specifying to the vendor the colors and finishes of the first structures or buildings that are surface treated during manufacture, the project owner shall submit the proposed treatment plan to the CPM for review and approval. If the CPM determines that the plan requires revision, the project owner shall provide to the CPM a plan with the specified revision(s) for review and approval by the CPM before any treatment is applied. Any modifications to the treatment plan must be submitted to the CPM for review and approval. The review of any subsequent revisions shall be completed by the CPM within 15 days of receipt of the revisions.	90 days prior to specifying colors to vendor	CEC	Permitting	5/14/2012
No	Accomplished	N/A	Milestone	N/A	VIS-1	COMM	Notify CEC that all Structures and Buildings are Ready for Inspection	The project owner shall notify the CPM that surface treatment of all listed structures and buildings has been completed and they are ready for inspection and shall submit one set of electronic color photographs from key observation points 1, 2, 3, 4, 5, 6, 7, and 8 analyzed in the Staff Assessment.	Prior to COD	CEC	Permitting	-
Yes	On going	Surface Treatment Maintenance Procedure/Surface Maintenance Reports	Recurrent	Annual	VIS-1	OPS	Provide Status Report to CEC	Provide a status report regarding surface treatment maintenance. Specify a): the condition of the surfaces of all structures and buildings at the end of the reporting year; b) maintenance activities that occurred during the reporting year; and c) the schedule of maintenance activities for the next year.	ACR	CEC	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	VIS-2	COMM	Provide Landscape Screening Plan to CEC	The screening plan shall be submitted to the CPM for review and approval.	90 days prior to installation	CEC	ASI	4/1/2014
No	Accomplished	Screening Maintenance Reports	Milestone	First 5 years	VIS-2	COMM	Report Maintenance Activities to CEC in ACR	Report maintenance activities, including replacement of plants that fail to thrive for the previous year of operation.	ACR, for first 5 years of operation	CEC	ASI	-
No	Accomplished	N/A	Milestone	N/A	VIS-3	CONS	Notify CEC that Compliance has been Met	Contact the CPM to show compliance with all of the above requirements. This shall include: final lighting plans, fixture and control schedules, fixture and control cut sheets and specifications, a photometric plan showing vertical and horizontal footcandles at all property lines to a height of 20 feet, and the proposed time clock schedule.	90 days prior to ordering exterior lighting	CEC	Permitting	temp light, 4/27/12, perm light, 8/28/13
No	Accomplished	N/A	Milestone	N/A	VIS-3	PC, CONS, & COMM	Notify CEC that Temp and Permanent Lighting is complete and ready for inspection	Notify the CPM that the temporary and permanent lighting has been completed and is ready for inspection. If after inspection the CPM says that modifications to the lighting are needed, within 30 days of receiving that notification owner shall implement the modifications and notify the CPM that the modifications have been completed and are ready for inspection.	Prior to construction/Prior to operation	CEC	Permitting	As Req.
Yes	As required	Lighting Complaints Reports	Continuous	N/A	VIS-3	CONS & OPS	Notify CEC of Lighting Complaints	Provide the CPM with a complaint resolution form report as specified in the Compliance General Conditions, including a proposal to resolve the complaint, and a schedule for implementation. A copy of the complaint resolution form report shall be submitted to the CPM within 30 days and included in the Annual Report.	within 48 hours of receiving lighting complaint	CEC	ASI	As Req.

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No	Accomplished	N/A	Milestone	N/A	VIS-4	PC	Submit Screening Plan to CEC	The screening plan shall be submitted to the CPM for review and approval.	90 days prior to installation	CEC	Permitting	4/9/2012
No	Accomplished	N/A	Milestone	N/A	VIS-4	CONS	Notify CEC that Screen Fence is Completed	Notify the CPM that the screening is ready for inspection.	7 days after completing screening install	CEC	Permitting	-
Yes	As required	Screening Maintenance Plan/Screening Maintenance Reports	On going	N/A	VIS-4	OPS	Report Maintenance Activities to CEC in ACR	Report maintenance activities, including replacement of damaged or destroyed screening for the previous year of operation.	ACR	CEC	ASI	ACR
Yes	Accomplished	N/A	Milestone	N/A	WASTE-1	PC	Prior to the removal of any underground storage tanks (UST's) found on site, the project owner shall submit a copy of the information typically required to obtain a permit to the San Bernardino Fire Department for review and comment.	Provide the plans to remove the underground storage tanks to the CPM for review and approval.	60 days prior to site mobilization	San Bernardino Fire Department, CPM	ASI	6/29/2011
Yes	Accomplished	N/A	Recurrent	Monthly	WASTE-1	PC	Submit ALL UST Data to CEC	Inform the CPM of the data when all USTs were removed from the site.	In MCR in month following removal	CPM	ASI	-
Yes	Accomplished	N/A	Milestone	N/A	WASTE-2	PC & CONS	The project owner shall obtain a hazardous waste generator identification number from the USEPA.	Obtain a hazardous waste generator identification number form the USEPA prior to generating any hazardous waste during project construction and operations.	Prior to Haz Waste generation	USEPA, CPM	Permitting	12/31/2012
Yes	Accomplished	N/A	Continuous	N/A	WASTE-2	CONS & OPS	Project Owner Shall Keep a Copy of Waste Generator Number on File at Project Site	Project owner shall keep a copy of the identification number on file at the project site and provide documentation of the hazardous waste generation notification and receipt of the number to the CPM after receipt of the number. Submittal of the notification and issued number documentation to the CPM is only needed once unless there is a change in ownership, operation, waste generation, or waste characteristics that requires a new notification to USEPA.	Monthly	USEPA, CPM	Permitting	12/31/2012
Yes	Accomplished	N/A	Milestone	N/A	WASTE-2	CONS & OPS	Changes in Waste Generator Numbers Shall Be Submitted to CEC	Documentation of any new or revised hazardous waste generation notifications or changes in identification number shall be provided to the CPM.	As required	USEPA, CPM	ASI/Permitting	As Req.
Yes	As required	N/A	Continuous	N/A	WASTE-3	CONS & OPS	The project owner shall ensure that the AMS is properly characterized and remediated as necessary pursuant to LRWQCB or DTSC voluntary site cleanup programs.	Submit to the CPM copies of all pertinent correspondence, work plans, agreements, and authorizations between the AMS Project and DTSC regarding Voluntary Site Cleanup Program requirements and activities at the AMS project site. The CPM shall review and comment on the proposed Cleanup Program requirements and activities. Provide to the CPM written notice from DTSC that the AMS site has been investigated and remediated, as necessary, for compliance with the Voluntary Cleanup Program.	60 days prior to site mobilization	Lahontan RWQCB, DTSC, CPM	ASI	6/29/2011
No	Accomplished	N/A	Milestone	N/A	WASTE-4	PC	If potentially contaminated soil is identified during site characterization, demolition, excavation or grading at either the proposed site or linear facilities the professional engineer or geologist shall inspect the site and determine the nature and extent of contamination.	Submit any final reports filed by the professional engineer or professional geologist to the CPM.	within 5 days of receipt	CEC	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	WASTE-4	PC	Notify CEC if Construction is Halted	Notify the CPM within 24 hours of any orders issued to halt construction.	within 24 hours of orders to halt construction	CEC	ASI	As Req.
No	Accomplished	N/A	Milestone	N/A	WASTE-5	PC	The project owner shall provide the resume of an experienced and qualified Professional Engineer or Geologist, who shall be available for consultation to the CPM for review and approval.	Submit the resume to the CPM for review and approval.	30 days prior to site mobilization	CEC	ASI	6/29/2011
No	Accomplished	N/A	Milestone	N/A	WASTE-6	PC	The project owner shall prepare a Construction Waste Management Plan.	Submit the Construction Waste Management Plan to the CPM for approval.	30 days prior to site mobilization	CEC	Permitting	7/29/2011
Yes	On going	Waste Disposal Records	Continuous	N/A	WASTE-7	CONS & OPS	During the construction and operation phase, the project owner shall maintain copies of the contracted waste and/or refuse haulers documentation of each waste load transferred from the construction site to a disposal site and/or recycling center.	Identify permitted solid waste facilities or recycling centers that receive construction waste and maintain copies of weigh tickets and manifests showing the type and volume of waste disposed. This information shall be maintained at the project site and made accessible to CPM and the San Bernardino County Environmental Health Service Department Solid Waste Program.	As required	San Bernardino County Environmental Health Service Dept. Solid Waste, CEC	ASI/Permitting	As Req.
Yes	As required	N/A	Continuous	N/A	WASTE-8	CONS & OPS	Prior to demolition of existing structures, the project owner shall complete and submit a copy of a MDAQMD Asbestos Demolition Notification form to the CPM and the MDAQMD for approval.	Provide the Asbestos Demolition Notification Form to the CPM for review and approval.	60 days prior to commencement of structure demolition	MDAQMD, CEC	ASI	01/22/2012

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Yes	Accomplished	N/A	Recurrent	Monthly	WASTE-8	CONS	Inform CEC when all Asbestos is Removed from Site	Inform the CPM of the data when all ACM is removed from the site.	Monthly	MDAQMD, CEC	ASI/Permitting	1/27/2012
Yes	Accomplished	N/A	Milestone	N/A	WASTE-9	COMM	The project owner shall prepare an Operation Waste Management Plan	Submit the Operation Waste Management Plan to the CPM for approval.	30 days prior to commercial operation	Local Certified Unified Program Agency, Dept. of Toxic Substances Control, CEC	ASI	6/15/2014
Yes	As required	N/A	Continuous	N/A	WASTE-9	COMM&OPS	The project owner shall prepare an Operation Waste Management Plan	Submit any required revisions to the CPM.	20 days of notification from the CPM revisions required	CEC	ASI	As Req.
Yes	On going	Waste Management Plan/Waste Management Records	Continuous	Annual	WASTE-9	OPS	Document Actual Waste Volumes and Methods and Update Waste Plan as Necessary.	Document the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan; and update the Operation Waste Management Plan, as necessary, to address current waste generation and management practices.	ACR	CEC	ASI	As Req.
Yes	On going	Waste Management Plan/Waste Management Records	Continuous	N/A	WASTE-10	OPS	The project owner shall submit to CEC and DTSC for approval the applicant's assessment of whether the HTF contaminated soil is considered hazardous or not.	Document all releases and spills of HTF as described in Condition of Certification WASTE-9 and as required in the SOIL & WATER RESOURCES section of the Staff Assessment. Cleanup and temporary staging of HTF-contaminated soils shall be conducted in accordance with the USEPA's current version of "Test Methods for Evaluating Solid Waste" (SW-846). Samples shall be analyzed in accordance with USEPA Method 1625B or other method to be reviewed and approved by DTSC and the CPM.	As required	DTSC, CEC	ASI/Permitting	As Req.
Yes	On going	HTF Contaminated Tests Results	Milestone	N/A	WASTE-10	OPS	Provide test results of HTF contaminated soil to DTSC and CEC.	Provide the results of the analyses and their assessment of whether the HTF-contaminated soil is considered hazardous or non-hazardous to DTSC and the CPM for review and approval.	within 28 days of an HTF spill	DTSC, CEC	ASI/Permitting	6/17/2014 WASTE10-05-00 6-04-14 WASTE10-03-00 Submitted 5/12/2014 WASTE10-00-00
Yes	Accomplished	Waste Management Plan/Waste Management Records	Milestone	N/A	WASTE-10	OPS	Dispose of Soil per CA HSC 25203 if DTSC and CEC determine that it is hazardous.	If DTSC and the CPM determine the HTF-contaminated soil is considered hazardous it shall be disposed of in accordance with California HSC Section 25203 and procedures outlined in the approved Operation Waste Management Plan required in Condition of Certification WASTE-9 and reported to the CPM in accordance with Condition of Certification WASTE-12.	As required	DTSC, CEC	ASI/Permitting	As Req.

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Yes	Accomplished	Waste Management Plan/Waste Management Records	Milestone	N/A	WASTE-10	OPS	If Soil is deemed Non-Hazardous by DTSC and CEC it shall be disposed of and retained in an on-site land farm.	If DTSC and the CPM determine the HTF-contaminated soil is considered nonhazardous it shall be retained in the land farm and treated on-site in accordance with the Waste Discharge Requirements contained in the Soil & Water Resources section of the PMPD.	As required	DTSC, CEC	ASI/Permitting	As Req.
Yes	Accomplished	Waste Management Plan/Cooling Tower Filter Cake Tests Results	Milestone	N/A	WASTE-11	COMM & OPS	The project owner shall ensure that the cooling tower basin sludge is tested.	Report the results of filter cake testing to the CPM. If two consecutive tests show that the sludge is non-hazardous, may apply to the CPM to discontinue testing.	Within 30 days of sampling	CEC	ASI/Permitting	As Req.
Yes	Accomplished	Waste Management Plan/Waste Management Records	Recurrent	Annual	WASTE-11	OPS	Report Test Results in ACR as condition of compliance WASTE-9.	The test results and method and location of sludge disposal shall reported in the ACR as required in Condition of Certification WASTE-9.	Annually	CEC	ASI Staff	As Req.
Yes	On going	Waste Management Plan/Waste Management Records	Continuous	N/A	WASTE-12	CONS & OPS	The project owner shall ensure that all spills or releases of hazardous substances, materials, or wastes are reported cleaned up, and remediated as necessary.	Document all unauthorized releases and spills of hazardous substances, materials, or wastes that are in excess of reportable quantities that occur on the project property or transmission corridors during construction and on the project property during operation.	As required	CEC	ASI/Permitting	As Req.
Yes	As required	Waste Management Plan/Waste Management Records	Continuous	N/A	WASTE-12	CONS & OPS	Provide any unauthorized spill documentation to CEC.	Copies of the unauthorized spill documentation shall be provided to the CEC.	Within 30 days of the date the release was discovered	CEC	ASI/Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	WORKERSAFETY-1	PC	The project owner shall submit to the CPM a copy of the Project Construction Safety and Health Program.	Submit to the SBCFD a copy of the Construction Fire Prevention Plan and Emergency Action Plan for review and comment and a copy of the Project Construction Safety and Health Program to the CPM for review and approval.	30 days prior to start of construction	San Bernardino County Fire Dept., CEC	Permitting	7/20/2011
No	Accomplished	N/A	Milestone	N/A	WORKERSAFETY-2	COMM	The project owner shall submit to CPM a Maintenance Safety and Health Program.	Submit to the SBCFD the final Operations Fire Prevention Plan and Emergency Action for review and the final Project Operations and Maintenance Safety and Health Program to the CPM for approval.	30 days prior to start of commissioning	San Bernardino County Fire Dept., CEC	ASI	7/20/2011
No	Accomplished	N/A	Milestone	N/A	WORKERSAFETY-3	PC	The project owner shall provide a site Construction Safety Supervisor (CSS) who is qualified and capable of identifying workplace hazards and has authority to take appropriate action to assure compliance and mitigate hazards.	Submit to the CPM the name and contact information for the Construction Safety Supervisor (CSS). The contact information of any replacement CSS shall be submitted to the CPM within one business day.	60 days prior to site mobilization	CEC, OSHA	Permitting	6/29/2011

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No	Accomplished	N/A	Recurrent	Monthly	WORKERSAFETY-3	CONS	Submit Safety Report as part of MCR.	The CSS shall submit in the MCR a monthly safety inspection report	MCR	CEC, OSHA	Permitting	Monthly
No	Accomplished	N/A	Milestone	N/A	WORKERSAFETY-4	PC	The project owner shall make payments to the Chief Building Officer (CBO) for the services of a Safety Monitor based on a reasonable fee schedule to be negotiated between the project owner and the CBO.	Provide proof of its agreement to fund the Safety Monitor services to the CPM for review and approval.	60 days prior to start of construction	CEC	ASI	6/29/2011
No	Accomplished	N/A	Milestone	N/A	WORKERSAFETY-5	PC	The project owner shall ensure that a portable external defibrillator (AED) is located on site during construction and operations.	Submit to the CPM proof that a portable automatic external defibrillator exists on site and a copy of the training and maintenance program for review and approval.	30 days prior to site mobilization	CEC	Permitting	7/31/2011
No	Accomplished	N/A	milestone	N/A	WORKERSAFETY-6	CONS	The project owner shall either, 1) reach a funding agreement with SBCFD regarding its project share-related costs of capital and operations to improve fire protection response or if no agreement can be reached, the project owner shall fund a study conducted by an independent contractor and in consultation with SBCFD to study project's fire protection requirements.	(1) A copy of the individual agreement with the SBCFD or, if the owner joins a power generation industry association, a copy of the group's bylaws and a copy of the group's agreement with the SBCFD; and evidence in each January Monthly Compliance Report that the project owner is in full compliance with the terms of such bylaws and/or agreement; or (2) A protocol, scope and schedule of work for the independent study and the qualifications of proposed contractor(s) for review and approval by the CPM; a copy of the completed study showing the precise amount the project owner shall pay for mitigation; and documentation that the amount has been paid.	five (5) days before construction of permanent aboveground structures	San Bernardino County Fire Dept., CPM	ASI	-
Yes	On going	N/A	Continuous	Annual	WORKERSAFETY-6	OPS	Provide CEC verification of payment to the SBCFD.	Annually thereafter, the owner shall provide the CPM with verification of funding to the SBCFD if annual payments were approved or recommended under either of the above-described funding resolution options.	Annually	San Bernardino County Fire Dept., CPM	ASI	-
No	Accomplished	N/A	Milestone	N/A	WORKERSAFETY-7	PC	The project owner shall provide a $200,000 payment to San Bernardino County Fire Department prior to start of construction to offset any initial funding required by WORKER SAFETY-6.	Provide a $200,000 payment to San Bernardino County Fire Department prior to the start of construction. Provide documentation of the payment described above to the CPM. The CPM shall adjust the payments initially required by WORKER SAFETY-6 based upon the accounting provided by the SBCFD.	5 days prior to start of construction	San Bernardino County Fire Dept., CPM	ASI	7/31/2011
No	Accomplished	N/A	Milestone	N/A	WORKERSAFETY-8	PC	The project owner shall develop and implement an enhanced Dust Control Plan.	Enhanced Dust Control Plan shall be provided to the CPM for review and approval.	60 days prior to site mobilization	CPM	ASI	6/29/2011
No	On going	N/A	Milestone	N/A	WORKERSAFETY-9	COMM	The project owner shall participate in joint training exercises with the SBCFD.	Submit to the CPM proof that the joint training with the SBCFD is established.	10 days prior to commissioning	San Bernardino County Fire Dept., CPM	ASI	
Yes	On going	N/A	Continuous	Annually	WORKERSAFETY-9	OPS	Submit to CEC proof that joint training with SBCFD was conducted.	Submit to the CPM proof that the joint training with the SBCFD was conducted. Include the date, list of participants, training protocol, and location in the yearly compliance report to the CPM.	Annually	San Bernardino County Fire Dept., CPM	ASI	02/19/14 Submittal Annual Training WKSF-9-00-01 3/11/14 Approval WKSF9-00-01
No	Accomplished	N/A	Milestone	N/A	GEN-1	COMM	Submit Verification Statement and CBO certified Certificate of Occupancy to CEC.	Submit to the CPM a statement of verification, signed by the responsible design engineer, attesting that all designs, construction, installation, and inspection requirements of the applicable LORS and the Energy Commission's decision have been met in the area of facility design. Provide the CPM a copy of the certificate of occupancy within 30 days of receipt from the CBO.	30 days of receipt of certificate of occupancy	CBO/CEC	All	Post CO
Yes	As required	N/A	Continuous	As Req.	GEN-1	OPS	Once Certificate of Occupancy has been issued, inform the CEC prior to any construction, repair or maintenance that requires CBO approval per LORS.	Once the certificate of occupancy has been issued, inform the CPM prior to any construction, addition, alteration, moving, demolition, repair, or maintenance to be performed on any portion(s) of the completed facility that requires CBO approval for compliance with the above codes. The CPM will then determine if the CBO needs to approve the work.	30 days prior to start of any activity listed requiring CBO approval	CBO/CEC	All	10/26/2017 Final Approval
No	Accomplished	N/A	Milestone	N/A	GEN-2	PC	Submit to CEC and CBO the monthly master discipline lists.	Submit to the CBO and to the CPM the schedule, and the master drawings and master specifications list of documents to be submitted to the CBO for review and approval. These documents shall be the pertinent design documents for the major structures, systems, and equipment defined above in Condition of Certification GEN-2. Major structures and equipment shall be added to or deleted from the list only with CPM approval.	60 days prior to start of grading	CBO/CEC	Permitting	6/29/2011
No	Accomplished	N/A	Milestone	N/A	GEN-2	CONS	Provide schedule updates in MCR.	Provide schedule updates in the monthly compliance report.	MCR	CBO/CEC	Permitting	6/29/2011

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
No	Accomplished	N/A	Milestone	N/A	GEN-3	PC	Make Required Payments to CBO.	Make the required payments to the CBO in accordance with the agreement. Send a copy of the CBO's receipt of payment to the CPM indicating that applicable fees have been paid. A copy of the contract between the project owner and the CBO shall be submitted to the CPM for review.	In next MCR	CBO/CEC	ASI	-
No	Accomplished	N/A	Milestone	N/A	GEN-4	PC	Submit Resume of RE and RE Delegate.	Submit to the CBO for review and approval, the resume and registration number of the resident engineer (RE) and any other delegated engineers assigned to the project. If the RE or the delegated engineer(s) is subsequently reassigned or replaced, the project owner has five days to submit the resume and registration number of the newly assigned engineer to the CBO for review and approval.	30 days prior to start of grading	CBO/CEC	Permitting	8/29/2011
No	Accomplished	N/A	Milestone	N/A	GEN-4	PC	Notify CEC of Any Change within 5 days.	Notify the CPM of the CBO's approvals of the RE and other delegated engineer(s).	within 5 days of CBO's approval	CBO/CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	GEN-5	PC	Submit Resumes within 30 days of grading to CBO.	Submit to the CBO for review and approval, resumes and registration numbers of the responsible civil engineer, soils (geotechnical) engineer and engineering geologist assigned to the project.	30 days prior to start of grading	CBO	Permitting	8/29/2011
No	Accomplished	N/A	Milestone	N/A	GEN-5	PC	Submit Resumes within 30 days of construction to CBO.	Submit to the CBO for review and approval, resumes and registration numbers of the responsible design engineer, mechanical engineer, and electrical engineer assigned to the project.	30 days prior to start of construction	CBO	Permitting	8/29/2011
No	Accomplished	N/A	Milestone	N/A	GEN-5	PC	Notify CEC of Any Change within 5 days.	Notify the CPM of the CBO's approvals of the responsible engineers.	within 5 days of the CBO's approval	CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	GEN-5	CONS	Notify CEC of Any Change within 5 days.	If the designated responsible engineer is subsequently reassigned or replaced, submit the resume and registration number of the newly assigned engineer to the CBO for review and approval.	within 5 days of replacement	CBO	Permitting	03/05/2014 GEN-05-06-00
No	Accomplished	N/A	Milestone	N/A	GEN-6	CONS	Submit Names and qualifications of Certified Weld Inspectors to CBO and copy CEC.	Submit to the CBO for review and approval, with a copy to the CPM, the name(s) and qualifications of the certified weld inspector(s), or other certified special inspector(s) assigned to the project to perform one or more of the duties set forth above.	15 days prior to start of activity requiring special inspection	CBO/CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	GEN-6	CONS	Submit Names and qualifications of Special Inspectors to CBO and copy CEC.	Also submit to the CPM a copy of the CBO's approval of the qualifications of all special inspectors.	in next MCR	CBO/CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	GEN-7	CONS	Submit CBO approval of any corrective action to CEC.	Transmit a copy of the CBO's approval of any corrective action taken to resolve a discrepancy to the CPM.	MCR	CBO/CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	GEN-7	CONS	If corrective action is disapproved, advise CEC within 5 days revised corrective action.	If any corrective action is disapproved, advise the CPM, within five days, of the reason for disapproval and the revised corrective action to obtain CBO's approval.	within 5 days of disapproval by CBO	CBO/CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	GEN-8	CONS	Submit Letter to CBO with copy to CEC that all work is ready for inspection.	Submit to the CBO, with a copy to the CPM, in the next monthly compliance report, (a) a written notice that the completed work is ready for final inspection, and (b) a signed statement that the work conforms to the final approved plans.	within 15 days of completion of CBO-approved work	CBO/CEC	Permitting	As Req.

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No	Accomplished	N/A	Milestone	N/A	GEN-8	CONS	Submit Letter confirming all documents are stored on site and location to CPM.	Submit to the CPM a letter stating both that the above documents have been stored and the storage location of those documents.	After storing the final approved engineering plans etc	CEC	Post COC	Post COC
No	Accomplished	N/A	Milestone	N/A	GEN-8	COMM	Submit 3 Sets of Electronic Copies to CBO.	Provide to the CBO three sets of electronic copies of the above documents at the project owner's expense. These are to be provided in the form of "read only" (Adobe .pdf 6.0) files, with restricted (password-protected) printing privileges, on archive quality compact disks.	within 90 days of completion of construction	CBO	Civil/Permitting	Post COC
Yes	Accomplished	N/A	Milestone	N/A	CIVIL-1	PC	Submit the Grading Plans to the CBO for review and approval and a copy of the transmittal letter to CEC.	Submit the 1. Design of the proposed drainage structures and the grading plan; 2. An erosion and sedimentation control plan; 3. Related calculations and specifications, signed and stamped by the responsible civil engineer; and 4. Soils, geotechnical, or foundation investigations reports required by the 2007 CBC to the CBO for design review and approval.	15 days prior to site grading	CBO/CEC	Civil	8/29/2011
Yes	Accomplished	N/A	Recurrent	Monthly	CIVIL-1	PC	Submit a written statement certifying that the documents have been approved by the CBO.	Submit a written statement certifying that the documents have been approved by the CBO.	in the next MCR	CBO/CEC	Permitting	9/10/2011
Yes	Accomplished	N/A	Milestone	N/A	CIVIL-2	CONS	Notify CEC within 24 hours when Earthwork and Construction are stopped as a result of adverse geologic/soil conditions.	Notify the CPM within 24 hours, when earthwork and construction is stopped as a result of unforeseen adverse geologic/soil conditions. Within 24 hours of the CBO's approval to resume earthwork and construction in the affected areas, provide to the CPM a copy of the CBO's approval.	24 hours following stop of construction; & within 24-hours of CBO's approval to resume	CBO/CEC	ASI/Permitting	As Req.
Yes	Accomplished	N/A	Milestone	N/A	CIVIL-3	CONS	RE to send NCR to CBO and CEC.	RE shall transmit to the CBO and the CPM a non-conformance report (NCR), and the proposed corrective action for review and approval.	within 5 days of discovery of discrepancies	CBO/CEC	ASI/Field	As Req.
Yes	Accomplished	N/A	Milestone	N/A	CIVIL-3	CONS	Owner to submit corrective action to CBO and CEC.	Owner shall submit the details of the corrective action to the CBO and CPM.	within 5 days of resolution of NCR	CBO/CEC	ASI/Permitting	As Req.
Yes	Accomplished	N/A	Recurrent	Monthly	CIVIL-3	CONS	Include NCR's in MCR.	A list of NCRs, for the reporting month, shall be included in MCR.	monthly in MCR	CEC	ASI/Permitting	As Req.
Yes	Accomplished	N/A	Milestone	N/A	CIVIL-4	CONS	Submit Grading Plans to CBO for Review and Approval with a Transmittal Copy to CEC	Submit to the CBO, for review and approval, the final grading plans (including final changes) and the responsible civil engineer's signed statement that the installation of the facilities and all erosion control measures were completed in accordance with the final approved combined grading plans, and that the facilities are adequate for their intended purposes, along with a copy of the transmittal letter to the CPM.	30 days of completion of erosion and sediment control work	CBO/CEC	Civil/Permitting	Post COC
Yes	Accomplished	N/A	Recurrent	N/A	CIVIL-4	CONS	Send the CPM a copy of the transmittal letter in the next monthly compliance report.	Submit a copy of the CBO's approval to the CPM in the next monthly compliance report.	In the next MCR following approval	CEC	Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-1	PC	Submit Structural Plans to CBO for Review and Approval with a Transmittal Copy to CEC	At least 60 days (or project owner and CBO approved alternative time frame) prior to the start of any increment of construction of any structure or component listed in the CBO-approved master drawing and master specifications list, the project owner shall submit to the CBO the above final design plans, specifications and calculations, with a copy of the transmittal letter to the CPM.	60 days prior to the start of construction of listed major structure	CBO/CEC	Mechanical	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-1	PC	Send the CPM a copy of the transmittal letter in the next monthly compliance report.	Submit to the CPM, in the next monthly compliance report, a copy of a statement from the CBO that the proposed structural plans, specifications, and calculations have been approved and comply with the requirements set forth in applicable engineering LORS.	In the next MCR following approval	CEC	Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-2	CONS	Send the CPM a copy of any Discrepancies in the form of an NCR and Include Corrective Actions	If a discrepancy is discovered in any of the above data, prepare and submit an NCR describing the nature of the discrepancies and the proposed corrective action to the CBO, with a copy of the transmittal letter to the CPM. The NCR shall reference the condition(s) of certification and the applicable CBC chapter and section.	within 5 days of discovery of discrepancies	CEC	Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-2	CONS	Submit a copy of the corrective action to the CBO and the CPM.	Submit a copy of the corrective action to the CBO and the CPM.	within 5 days of resolution of NCR	CBO/CEC	Structural/Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-2	CONS	Submit a copy of the CBO's corrective action decision to the CPM.	Transmit a copy of the CBO's approval or disapproval of the corrective action to the CPM .	within 15 days of CBO decision	CBO/CEC	Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-2	CONS		If disapproved, advise the CPM, the reason for disapproval, and the revised corrective action to obtain CBO's approval.	within 5 days of disapproval by CBO	CBO/CEC	Structural/Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-3	PC & CONS	Submit a copy of intended design changes to the CBO and a copy of the transmittal to the CPM.	Notify the CBO of the intended filing of design changes, and submit the required number of sets of revised drawings and the required number of copies of the other above-mentioned documents to the CBO, with a copy of the transmittal letter to the CPM.	on a schedule suitable to the CBO	CBO/CEC	Structural/Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-3	PC & CONS	Submit a copy of the CBO's Plan and Inspection Approvals.	Notify the CPM, via monthly compliance report, when the CBO has approved the revised plans.	In the next MCR following approval	CBO/CEC	Permitting	As Req.

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No	N/A	N/A	Milestone	N/A	STRUC-4	CONS	Submit Structural Tank or Vessel Plans to CBO for Review and Approval with a Transmittal Copy to CEC	Prior to the start of installation of the tanks or vessels containing the specified quantities of toxic or hazardous materials, submit to the CBO for design review and approval final design plans, specifications, and calculations, including a copy of the signed and stamped engineer's certification.	30 days prior to installation	CBO	Structural/Permitting	As Req.
No	N/A	N/A	Milestone	N/A	STRUC-4	CONS	Submit a copy of the CBO's Plan and Inspection Approvals.	Send copies of the CBO approvals of plan checks to the CPM in the following monthly compliance report. Also transmit a copy of the CBO's inspection approvals to the CPM in the monthly compliance report following completion of any inspection.	In the next MCR following approval	CBO/CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	MECH-1	CONS	Submit Piping and Plumbing Plans to CBO for Review and Approval.	At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of any increment of major piping or plumbing construction listed in the CBO-approved master drawing and master specifications list, the project owner shall submit to the CBO for design review and approval the final plans, specifications, and calculations, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with applicable LORS.	30 days prior to the start of any increment of major piping or plumbing construction	CBO	Mechanical/Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	MECH-1	CONS	Send the CPM a copy of the transmittal letter.	Send the CPM a copy of the transmittal letter.	in the next MCR	CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	MECH-1	CONS	Send the CPM a copy of the Inspection Approval from CBO.	Transmit to the CPM following completion of any inspection, a copy of the transmittal letter conveying the CBO's inspection approvals.	In the next MCR following inspection	CBO/CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	MECH-2	CONS	Submit Pressure Vessel Plans to CBO for Review and Approval and Transmittal to CEC.	For all pressure vessels installed in the plant: Submit to the CBO for design review and approval, the listed documents, including a copy of the signed and stamped engineer's certification, with a copy of the transmittal letter to the CPM.	30 days prior to the start of PV on-site fabrication or installation	CBO	Mechanical/Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	MECH-2	CONS & COMM	Send the CPM a copy of the Inspection Approval from CBO.	Transmit to the CPM, following completion of any inspection, a copy of the transmittal letter conveying the CBO's and/or Cal-OSHA inspection approvals.	In the next MCR following inspection	CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	MECH-3	CONS	Submit HVAC Plans to CBO for Review and Approval and Transmittal to CEC.	Prior to the start of construction of any HVAC or refrigeration system, submit to the CBO the required HVAC and refrigeration calculations, plans, and specifications, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with the CBC and other applicable codes, with a copy of the transmittal letter to the CPM.	30 days prior to construction of any HVAC or refrigeration system	CBO/CEC	Mechanical/Permitting	As Req.
No	N/A	N/A	Milestone	N/A	ELEC-1	CONS	Submit Electrical Plans to CBO for Review and Approval with a Transmittal Copy to CEC	Prior to the start of each increment of electrical construction, submit to the CBO for design review and approval the above listed documents. Include in this submittal a copy of the signed and stamped statement from the responsible electrical engineer attesting compliance with the applicable LORS.	30 days prior to start of each increment of electrical construction	CBO/CEC	Electrical	As Req.
No	N/A	N/A	Milestone	N/A	ELEC-1	CONS	Send the CPM a copy of the transmittal letter in the next monthly compliance report.	Send the CPM a copy of the transmittal letter in the next monthly compliance report.	in the next MCR	CBO/CEC	Permitting	As Req.
Yes	Accomplished	N/A	Milestone	N/A	PAL-1	PC	Submit statement and resume of availability of PRS	Submit a resume and statement of availability of its designated paleontological resource specialist (PRS) for on-site work.	60 days prior to ground disturbance	CEC	ASI	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	PAL-1	PC	Provide letter naming all monitors	Provide a letter with resumes naming anticipated monitors for the project, stating that the identified monitors meet the minimum qualifications for paleontological resource monitoring required by the condition. If additional monitors are obtained during the project, the PRS shall provide additional letters and resumes to the CPM. The letter shall be provided to the CPM no later than one week prior to the monitor's beginning on-site duties.	20 days prior to ground disturbance	CEC	ASI	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	PAL-1	CONS	Provide Resume of New PRS	Prior to the termination or release of a PRS, submit the resume of the proposed new PRS to the CPM for review and approval.	As required	CEC	ASI	As Req.
Yes	Accomplished	N/A	Milestone	N/A	PAL-2	PC	Provide Monitor Maps to PRS and CEC	Provide the maps and drawings to the PRS and CPM.	30 days prior to ground disturbance	CEC	ASI/AEPC Staff	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	PAL-2	PC	Provide Revised Monitor Maps to PRS and CEC	If there are changes to the footprint of the project, revised maps and drawings shall be provided to the PRS and CPM.	15 days prior to ground disturbance	CEC	ASI/AEPC Staff	As Req.
Yes	Accomplished	N/A	Milestone	N/A	PAL-2	PC	Provide Scheduling Changes of Construction Phases to CEC	If there are changes to the scheduling of the construction phases, submit a letter to the CPM.	within 5 days of identifying changes	CEC	ASI/AEPC Staff	As Req.

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Yes	Accomplished	N/A	Milestone	N/A	PAL-3	PC	Provide a Copy of the PRMMP to CEC	Provide a copy of a paleontological resources monitoring and mitigation plan (PRMMP) to the CPM. The PRMMP shall include an affidavit of authorship by the PRS and acceptance of the PRMMP by the project owner evidenced by a signature.	30 days prior to ground disturbance	CEC	ASI	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	PAL-4	PC	Provide a Copy of the WEAP to CEC	Submit the proposed Worker Environmental Awareness Program (WEAP), including the brochure, with the set of reporting procedures for workers to follow.	30 days prior to ground disturbance	CEC	ASI	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	PAL-4	PC	Provide a Copy of the WEAP to CEC	Submit the training program presentation/ materials to the CPM for approval if planning to use a presentation format other than an in-person trainer for training.	30 days prior to ground disturbance	CEC	ASI	6/29/2011
Yes	Accomplished	N/A	Milestone	N/A	PAL-4	PC	Provide a Copy of the WEAP to CEC	If the owner requests an alternate paleontological trainer, the resume and qualifications of the trainer shall be submitted to the CPM for review and approval prior to installation of an alternate trainer. Alternate trainers shall not conduct training prior to CPM authorization.	As necessary	CEC	ASI	As Req.
Yes	Accomplished	N/A	Recurrent	Monthly	PAL-4	CONS	Provide a Copy of the WEAP to CEC	Provide copies of the WEAP certification of completion forms with the names of those trained and the trainer or type of training (in-person or other approved presentation format) offered that month. Also include a running total of all persons who have completed the training to date.	MCR	CEC	ASI	Monthly
Yes	Accomplished	N/A	Recurrent	Monthly	PAL-5	CONS	Notify CEC of Any Planned Monitoring Changes	Ensure that the PRS submits the summary of monitoring and paleontological activities in the MCR.	MCR	CEC	ASI	As Req.
Yes	Accomplished	N/A	Milestone	N/A	PAL-5	CONS	Notify CEC of Any Planned Monitoring Changes	When feasible, the CPM shall be notified 10 days in advance of any proposed changes in monitoring different from the plan identified in the PRMMP. If there is any unforeseen change in monitoring, the notice shall be given as soon as possible prior to implementation of the change.	10 days in advance of proposed monitoring changes, or ASAP	CEC	ASI	As Req.
Yes	Accomplished	N/A	Continuous	N/A	PAL-6	OPS	Maintain Paleontological Agreements	Maintain in compliance file copies of signed contracts or agreements with the designated PRS and other qualified research specialists. Maintain these files for a period of three years after project completion and approval of the CPM-approved paleontological resource report (see Condition of Certification PAL-7). Shall be responsible for paying any curation fees charged by the museum for fossils collected and curated as a result of paleontological mitigation. A copy of the letter of transmittal submitting the fossils to the curating institution shall be provided to the CPM.	maintain for 3 years after project completion and CPM-approval of PR Report	CEC	ASI	As Req.
Yes	N/A	N/A	Milestone	N/A	PAL-7	CONS	Submit PRR	Submit the PRR under confidential cover to the CPM.	within 90 days of completion of ground disturbance	CEC	ASI	Post COC
No	Accomplished	N/A	Milestone	N/A	TSE-1	PC	Submit Master Drawing and Specifications Lists 6/29/2011to CBO and CEC	At least 60 days prior to the start of construction of the transmission elements of the project, submit the schedule, a Master Drawing List, and a Master Specifications List to the CBO and to the CPM. The schedule shall contain a description and list of proposed submittal packages for design, calculations, and specifications for major structures and equipment. Additions and deletions shall be made to the table only with CPM and CBO approval.	60 days prior to start of construction of the transmission elements	A/T	Permitting	8/29/2011
No	Accomplished	N/A	Milestone	N/A	TSE-1	CONS	Provide Monthly Schedule Updates	Provide schedule updates in the MCR.	MCR	CEC	Permitting	Monthly
No	Accomplished	N/A	Milestone	N/A	TSE-2	PC	Provide CBO Resumes of All Responsible Project Engineers	Submit to CBO for review and approval, the names, qualifications and registration numbers of all the responsible engineers assigned to the project.	30 Days Prior to Rough Grading	CBO	Permitting	8/1/2011
No	Accomplished	N/A	Milestone	N/A	TSE-2	PC	Provide Resume copies to CEC	Notify CPM of the CBO's approval.	within 5 days of CBO approval	CEC	Permitting	6/5/2011
No	Accomplished	N/A	Milestone	N/A	TSE-2	PC & CONS	Provide Resume of New Engineer and notify CEC within 5 Days	If the designated responsible engineer is subsequently reassigned or replaced, the project owner has five days in which to submit the name, qualifications, and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer within five days of the approval.	within 5 days of change in RE	CBO, CEC	Permitting	As Req.

Action Req	Progress	EMS Plan link	Evaluation Type	Frequency	Cond. #	Sort Code	Description	Verification/Action/Submittal Required by Project Owner	Timeframe	Involved Agencies	Responsible Discipline	Required Approval Date Drws/Docs
No	Accomplished	N/A	Milestone	N/A	TSE-3	CONS	Provide Copy of CBO approval or disapproval	Submit a copy of CBO's approval or disapproval of any corrective action taken to resolve a discrepancy to the CPM.	within 15 days of receipt	CBO, CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	TSE-3	CONS	If Disapproved, Provide Corrective Action	If disapproved, advise the CPM, the reason for disapproval, and the revised corrective action to obtain CBO's approval.	within 5 days of CBO disapproval	CBO, CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	TSE-4	CONS	Prior to start of Construction, Submit Proposed Design Plans to CBO	Prior to the start of each increment of construction, submit to the CBO for review and approval the final design plans, specifications and calculations for equipment and systems of the power plant switchyard, outlet line and termination, including a copy of the signed and stamped statement from the responsible electrical engineer attesting to compliance with the applicable LORS.	30 days prior to start of each increment of construction	CBO	Electrical	As Req.
No	Accomplished	N/A	Milestone	N/A	TSE-4	CONS	Send CEC a Copy of Transmittal	Send the CPM a copy of the transmittal letter.	in the next MCR	CEC	Permitting	As Req.
No	Accomplished	N/A	Milestone	N/A	TSE-5	CONS	Submit Proposed Transmission Facility Drawings to CBO	To ensure the proposed transmission facilities will conform to all applicable LORS, submit to the CBO for approval: Items A through G listed in the COC, including Design drawings, specifications and calculations, with design criteria, Electrical one-line diagrams, the Special Protection System (SPS) sequencing and timing if applicable, a letter stating the mitigation measures or projects selected by the transmission owners for each reliability criteria violation are acceptable, an Operational study report based on the expected or current COD from the California ISO and/or SCE, and a copy of the executed LGIA signed by the California ISO and the project owner.	60 days prior to construction of transmission facilities	CBO	Electrical	As Req.
No	Accomplished	N/A	Milestone	N/A	TSE-6	CONS	Submit Change Request of Transmission Facility Drawings to CBO and CEC	Inform the CBO and the CPM of any impending changes that may not conform to requirements of TSE-5 and request approval to implement such changes.	60 days prior to construction of transmission facilities	CBO, CEC	Electrical	As Req.
No	Accomplished	N/A	Milestone	N/A	TSE-7	COMM	Provide CEC a Copy of CAISO Letter	Provide copies of the CAISO letter to the CPM when it is sent to the CAISO.	1 week prior to initial synchronization with grid	CAISO, CEC	Electrical	
No	Accomplished	N/A	Milestone		TSE-7	COMM	Contact CAISO One Day Prior to Synchronization	Contact CAISO Outage Coordination Department, Mon thru Fri, btwn 0700 and 1530 at (916) 351-2300 at least one business day prior to synchronizing the facility with the grid for testing. A report of conversation with the CAISO shall be provided electronically to the CPM one day before synchronizing the facility with the CA transmission system for the first time.	1 day prior to initial synchronization with grid	CAISO, CEC	Electrical	
No	Accomplished	N/A	Milestone		TSE-8	COMM	Submit As-Built Drawings to CBO and CEC	Transmit to the CPM and CBO: "As Builts" and one-line drawings of the electrical portion; "as built" engineering description of the mechanical, structural, and civil portion of the transmission facilities they shall be maintained at the power plant and made available if requested for CPM Audit; A summary of inspections of the completed transmission facilities. [See COC]	within 60 days after first synchronization	CBO, CEC	Electrical	As Req.

Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Appendix C

Compliance 10

Complaints

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Submitted Electronically

Subject: **09-AFC-5C**
Condition Number: **COPM 10**
Description: **TN262752_zane Comments-Project External Lights**
Submittal Number: **COMP10-08-00**

April 25, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov

Ms. Gutierrez,

In accordance with Condition of Compliance 10, MSP acknowledges receipt of TN262752 submitted through the project docket concerning the brightness of the project's external light. The comment was submitted on April 23, 2025, and MSP began investigating immediately. An update with resolutions will be provided in the coming weeks.

Please feel free to contact me if you have any questions or comments.

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

Attachment:
TN262752_20250423T133519_zane Comments - lights

DOCKETED	
Docket Number:	09-AFC-05C
Project Title:	Abengoa Mojave Compliance
TN #:	262752
Document Title:	zane Comments - lights
Description:	N/A
Filer:	System
Organization:	zane
Submitter Role:	Public
Submission Date:	4/23/2025 1:35:20 PM
Docketed Date:	4/23/2025

Comment Received From: zane
Submitted On: 4/23/2025
Docket Number: 09-AFC-05C

lights

to whom it may concern -

the external lights during dark hours for the mojave solar project appear way too bright.

thank you,

zane

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: 09-AFC-5C
Condition Number: COMP 10
Description: TN262752_zane Comments-Project External Lights Resolution
Submittal Number: COMP10-08-01

May 23, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov
Submitted electronically via email

Ms. Gutierrez,

Following the comment received, attached as *Exhibit A*, from Docket Number 09-AFC-05C on April 23, 2025 (TN262752) regarding the brightness of the Mojave Solar Project's ("MSP") external lighting, MSP immediately investigated this matter to resolve the comment.

MSP's investigation revealed that following the scheduled replacement of burned-out lights, some of the light fixtures were not angled correctly. In response, MSP re-adjusted several light fixtures to re-direct illumination back toward the ground and focus the illumination specifically on operational equipment. These adjustments were made to reduce any unintended light spill while maintaining necessary visibility for the safety of MSP staff and operations.

MSP reached out to the complainant via email on May 21, 2025, to communicate MSP's resolution. *See Exhibit B attached*. As of the date of this letter, MSP has not received a response from the complainant. Accordingly, MSP considers this matter closed. In the event the complainant responds, MSP will supplement accordingly. Please feel free to reach out if you have any questions.

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
Email: mahnaz.ghamati@atlantica.com

Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347

Phone: 760 308 0400

Exhibit A
Docket Number 09-AFC-5C
Submittal Number COMP 10-08-01
TN262752

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Submitted Electronically

Subject: **09-AFC-5C**
Condition Number: **COPM 10**
Description: **TN262752_zane Comments-Project External Lights**
Submittal Number: **COMP10-08-00**

April 25, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov

Ms. Gutierrez,

In accordance with Condition of Compliance 10, MSP acknowledges receipt of TN262752 submitted through the project docket concerning the brightness of the project's external light. The comment was submitted on April 23, 2025, and MSP began investigating immediately. An update with resolutions will be provided in the coming weeks.

Please feel free to contact me if you have any questions or comments.

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

Attachment:
TN262752_20250423T133519_zane Comments - lights

DOCKETED	
Docket Number:	09-AFC-05C
Project Title:	Abengoa Mojave Compliance
TN #:	262752
Document Title:	zane Comments - lights
Description:	N/A
Filer:	System
Organization:	zane
Submitter Role:	Public
Submission Date:	4/23/2025 1:35:20 PM
Docketed Date:	4/23/2025

Comment Received From: zane
Submitted On: 4/23/2025
Docket Number: 09-AFC-05C

lights

to whom it may concern -

the external lights during dark hours for the mojave solar project appear way too bright.

thank you,

zane

Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347

Phone: 760 308 0400

Exhibit B

MSP correspondence to complainant

ATTACHMENT 1
COMPLAINT REPORT/RESOLUTION FORM

COMPLAINTANT INFORMATION

Name: Zane Phone Number: NA

Address: zanemurdock@gmail.com

COMPLAINT

DATE COMPLAINT RECEIVED: April 23, 2025 TIME COMPLAINT RECEIVED: 13:35

COMPLAINT RECEIVED BY: ☐ TELEPHONE ☒ IN WRITING (COPY ATTACHED)

DATE OF FIRST OCCURRENCE: April 23, 2025

DESCRIPTION OF COMPLAINT (INCLUDING DATES, FREQUENCY, AND DURATION):

the external lights during dark hours for the mojave solar project appear way too bright.

FINDINGS OF INVESTIGATION BY PLANT PERSONNEL:

During the replacement of the burned-out lights, some of the newly installed lights were not positioned at the correct angles.

DOES COMPLAINT RELATE TO VIOLATION OF A CEC REQUIREMENT? ☐ YES ☒ NO

DATE COMPLAINTANT CONTACTED TO DISCUSS FINDINGS: 05/21/2025

DESCRIPTION OF CORECTIVE MEASURES TAKEN OR OTHER COMPLAINT RESOLUTION:

Some of the light fixtures repositioned to direct the light more toward the ground,and focusing it specifically on the equipment.These changes were made to minimize any unintended impact while maintaining operational visibility.

DOES COMPLAINTANT AGREE WITH PROPOSED RESOLUTION? ☐ YES ☐ NO

IF NOT, EXPLAIN: MSP has not received any response from the complaintant yet.

CORRECTIVE ACTION

IF CORRECTIVE ACTION NECESSARY, DATE COMPLETED:

DATE FIRST LETTER SENT TO COMPLAINTANT (COPY ATTACHED):

DATE FINAL LETTER SENT TO COMPLAINTANT (COPY ATTACHED):

OTHER RELEVANT INFORMATION:

"This information is certified to be correct."

PLANT MANAGER SIGNATURE: DATE:

(ATTACH ADDITIONAL PAGES AND ALL SUPPORTING DOCUMENTATION, AS REQUIRED)

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: **09-AFC-5C**
Condition Number: **COPM 10**
Description: **Employee Complaint to Cal/OSHA**
Submittal Number: **COMP10-09-00**

May 13, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov
Submitted electronically via email

Ms. Gutierrez,

In accordance with Condition of Compliance 10, I am writing to inform you that on May 8, 2025, a Cal/OSHA Associate Safety Engineer from the San Bernardino Enforcement office conducted a site visit at our facility. This visit was allegedly initiated in response to an employee complaint, which necessitated a site investigation.

Cal/OSHA is currently undertaking an investigation based on the alleged complaint received. We are fully cooperating with their inquiries and have submitted the requested documents as part of their data request.

We will continue to keep you informed of the progress of this matter and any subsequent developments. Please feel free to contact us with any questions or concerns.

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

Attachment: Doc Req Mojave Solar-05082025

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH
Submit to: 464 W. Fourth St., Suite 332, San Bernardino, CA 92401-1429
Tel: (909) 383-4321
Fax: (909) 383-6789

DOCUMENT REQUEST SHEET

EMPLOYER: Mojave Solar DATE: 5/8/2025 POSTMARK BY DATE: 5/15/2025
EMPLOYER CONTACT: Mahnaz Ghamati RECEIVED BY: Mahnaz Ghamati

As discussed during the inspection on 5/8/2025 it has been determined that copies of the following documents are required for review. Please provide the Cal/OSHA inspector with the required copies by the "postmark" date noted above. If the copies are not provided by that date, it will be interpreted as an admission that the documents do not exist, and possible citations and monetary penalties could result.
No Share Drives Please.

□ ER Tax ID No. (FEIN/State) X Workers Com Ins. Cert. □ Garment Registration □ Farm Labor Contractor Num. Rec'd_____
□ Business License □ CSLB □ Permits: Project/Annual/Building □ Excavation □ Erection □ Scaffolding □ Carcinogen Rec'd_____

□ Facility Layout (floor plan, evacuation routes, process flow diag., equipment location of confined spaces) _____ Rec'd _____

X Cal/OSHA 300(Log of Work-Related Injuries and Illnesses) Current & previous _3_ years[8 CCR §14301] _____ Rec'd _____

□ Cal/OSHA 301 (Injury and Illness Incident Report) _____ Rec'd _____

□ Cal/OSHA 5020 (Employer's First Report of Injury) _____ Rec'd _____

□ Cal/OSHA 5021 (Doctor's First Report of Injury) _____ Rec'd _____

□ DWC Form 1 (Worker's Compensation Claim)_____ Rec'd _____

X Written Injury and Illness Prevention Program-IIPP (written safety program) [8 CCR §3203/§1509]_____ Rec'd _____

□ Safety Inspection Records _____ Rec'd _____

□ Employee Training Records_____ Rec'd _____

□ Employer's Accident Investigation Report (including photos, witness statement, video, etc.)_____ Rec'd _____

□ Code of Safe Practices □ Toolbox/Tailgate Meeting Records_____ Rec'd _____

□ Other:_____ Rec'd _____

□ Emergency Action Plan [8 CCR §3220] □ Fire Prevention Plan [8 CCR §3221] □ First Aid Kit Medical Approval [8 CCR §3400/§1512]_____ Rec'd _____

X Written Heat Illness Prevention Program [8 CCR §3395]_____ Rec'd _____

□ Training For:_____ Rec'd _____

□ Hazard Communication Program (HazCom) [8 CCR §5194] Including: _____ Rec'd _____

□ Training (HazCom) For:_____ Rec'd _____

□ Safety Data Sheets (SDS) _____ Rec'd _____

□ Hazardous Substances Inventory_____ Rec'd _____

□ Respiratory Protection Program [8 CCR §5144]_____ Rec'd _____

□ Hearing Conservation Program (Noise) [8 CCR §5097]_____ Rec'd _____

□ Exposure Control Plan (Bloodborne Pathogens) [8 CCR §5193] □Sharps Injury Log (s)_____ Rec'd _____

□ Workplace Exposure Records/Monitoring Records_____ Rec'd _____

X Hazardous Energy Control Procedure (lockout/Tagout) [8 CCR §3314]___and training materials_____ Rec'd _____

□ Carcinogen Registration [8 CCR §Article 110]_____ Rec'd _____

□ Equipment Manuals/Safety Instructions (operation, user, maintenance, etc.)_____ Rec'd _____

□ Contract Agreement _____ Rec'd _____

X Nationwide total count of employees (incl mgt) & count of employees at this site _____ Rec'd _____

□ List of employee names w/title and department (incl mgt)_____ Rec'd _____

X Signed Letter certifying the legal name of the employer_____ Rec'd _____

□ Payroll records and timesheets for:_____ Rec'd _____

X Other:__Electrical training materials for training that is provided to electrical workers_____ Rec'd _____

□ Other:_____ Rec'd _____

□ Other:_____ Rec'd _____

If you require an extension of time in order to satisfy this request, please contact the Cal/OSHA inspector who conducted your inspection at the phone numbers above before the deadline. All extension requests are subject to approval. .

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: **09-AFC-5C**
Condition Number: **COPM 10**
Description: **Cal/OSHA Inspection 1823730-Closure**
Submittal Number: **COMP10-09-01**

November 5, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov
Submitted electronically via email

Ms. Gutierrez,

As required by Condition of Compliance 10, I'm providing an update on the Cal/OSHA inspection that began May 8, 2025, when an Associate Safety Engineer from the San Bernardino Enforcement Office visited the site. The inspection was allegedly initiated in response to an employee complaint.

On October 31, MSP received a "Citation and Notification of Penalty Letter" from the California Department of Industrial Relations, Division of Occupational Safety and Health (San Bernardino District Office), concluding investigation #1823730.

As stated in the citation letter, all findings were corrected by MSP during the investigation, and an abatement credit was granted for those corrective actions.

A penalty totaling $16,233 was assessed and subsequently paid by MSP on November 4, 2025.

The "citation and penalty letter" and the "payment confirmation" are attached for your reference. Please let us know if you have any questions.

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

Attachment:
- Citations Mojave Solar 1823730
- Payment Confirmation

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

CITATION AND NOTIFICATION OF PENALTY

To:
Mojave Solar Project
and its successors
42134 Harper Lake Road
Hinkley, CA 92347

Inspection Site:
42134 Harper Lake Road
Hinkley, CA 92347

Inspection #: 1823730
Inspection Date (s): 05/08/2025 – 10/31/2025
Issuance Date: 10/31/2025
CSHO ID: P0550
Optional Report #: 24
Reporting ID: 0950633

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (hereinafter Citation) is being issued in accordance with California Labor Code Section 6317 for violations that were found during the inspection/ investigation. **This Citation or a copy, including the enclosed multilingual employee notice, must be prominently posted upon receipt by the employer at or near the location of each violation until the violative condition is corrected or for three working days, whichever is longer**. Violations of Title 8 of the California Code of Regulations or of the California Labor Code may result in some instances in prosecution for a misdemeanor.

YOU HAVE A RIGHT to contest this Citation and Notification of Penalty by filing an appeal with the Occupational Safety and Health Appeals Board. To initiate your appeal, you **must** contact the Appeals Board, in writing or by telephone, or online, within 15 working days from the date of receipt of this Citation. If you miss the 15 working day deadline to appeal, the Citation and Notification of Penalty becomes a final order of the Appeals Board, not subject to review by any court or agency.

Informal Conference - You may request an informal conference with the manager of the district office which issued the Citation within 10 working days after receipt of the Citation. However, if the citation is appealed, you may request an informal conference at any time prior to the day of the hearing. Employers are encouraged to schedule a conference at the earliest possible time to assure an expeditious resolution of any issues. At the informal conference, you may discuss the existence of the alleged violation(s), classification of the violation(s), abatement date or proposed penalty.

Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an agreement which resolves this matter without litigation or contest.

APPEAL RIGHTS

The Occupational Safety and Health Appeals Board (Appeals Board) consists of three members appointed by the Governor. The Appeals Board is a separate entity from the Division of Occupational Safety and Health (Cal/OSHA or the Division) and employs experienced administrative law judges to hear appeals fairly and impartially. To initiate an appeal from a Citation and Notification of Penalty, you must contact the Appeals Board in writing, or by telephone, or online via the Board's OASIS system, within 15 working days from the date of receipt of a Citation.

After you have initiated your appeal, you must then file a completed appeal form with the Appeals Board, at the address listed below, or online via the Board's OASIS system, for each contested Citation. Failure to file a completed appeal form with the Appeals Board may result in dismissal of the appeal. Appeal forms are available to print online at: https://www.dir.ca.gov/oshab/appealform.pdf. You may also file the appeal through the Board's online OASIS system at: https://www.dir.ca.gov/oshab/. Hard copies can also be picked up from district offices of the Division, or from the Appeals Board:

Occupational Safety and Health Appeals Board
2520 Venture Oaks Way, Suite 300
Sacramento, CA 95833
Telephone: (916) 274-5751 or (877) 252-1987
Fax: (916) 274-5785

If the Citation you are appealing alleges more than one item, you must specify on the appeal form which items you are appealing. The appeal form also asks you to identify the grounds for your appeal. Among the specific grounds for an appeal are the following: the safety order was not violated, the classification of the alleged violation (e.g., serious, repeat, willful) is incorrect, the abatement requirements are unreasonable or the proposed penalty is unreasonable.

Important: You must notify the Appeals Board, not the Division, of your intent to appeal within 15 working days from the date of receipt of the Citation. Otherwise, the Citation and Notification of Penalty becomes a final order of the Appeals Board not subject to review by any court or agency. An informal conference with Cal/OSHA or the Division **does not** constitute an appeal and **does not** stay the 15 working day appeal period. If you have any questions concerning your appeal rights, call the Appeals Board, at (916) 274-5751 or (877) 252-1987.

PENALTY PAYMENT OPTIONS

Penalties are due within 15 working days of receipt of this Citation and Notification of Penalty unless contested. If you are appealing any item of the Citation, remittance is still due on all items that are not appealed. Enclosed for your use is a Penalty Remittance Form for payment.

If you are paying electronically, please have the Penalty Remittance Form on-hand when you are ready to make your payment. The company name, inspection number, and Citation number(s) will be required in order to ensure that the payment is accurately posted to your account. Please go to: **www.dir.ca.gov/dosh/CalOSHA_PaymentOption.html** to access the secure payment processing site. **Additionally, you must also mail the Penalty Remittance Form to the address below.**

If you are paying by check, return one copy of the Citation, along with the Notice of Proposed Penalties Sheet and the Penalty Remittance Form and mail to:

Department of Industrial Relations
Cal/OSHA Penalties
P. O. Box 516547
Los Angeles, CA 90051-0595

Cal/OSHA does not agree to any restrictions, conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions, conditions, or endorsements do not exist.

NOTIFICATION OF CORRECTIVE ACTION

For violations which you do not contest, you should notify the Division of Occupational Safety and Health promptly by letter that you have taken appropriate corrective action within the time frame set forth on this Citation and Notification of Penalty. Please inform the district office listed on the Citation by submitting the Cal/OSHA 160 form with the abatement steps you have taken and the date the violation was abated, together with adequate supporting documentation, e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results, etc. The adjusted penalty for general violations has already been reduced by 50% on the presumption that the employer will correct the violations by the abatement date. The adjusted penalty for serious violations, if any, has already been reduced by 50% because abatement of those violations has been completed.

Note: Return the Cal/OSHA 160 form to the district office listed on the Citation and as shown below:

Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Telephone: (909) 383-4321
Fax: (909) 383-6789

EMPLOYEE RIGHTS

Employer Discrimination Unlawful - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under Labor Code Section 6310 or 6311. An employee who believes that he/she has been discriminated against may file a complaint no later than six (6) months after the discrimination occurred with the Division of Labor Standards Enforcement.

Employee Appeals - An employee or authorized employee's representative may, within 15 working days of the issuance of a citation, special order, or order to take special action, appeal to the Occupational Safety and Health Appeals Board the reasonableness of the period of time fixed by the Division of Occupational Safety and Health (Division) for abatement. An employee appeal may be filed with the Appeals Board or with the Division. No particular format is necessary to initiate the appeal, but the notice of appeal must be in writing.

If an Employee Appeal is filed with the Division, the Division shall note on the face of the document the date of receipt, include any envelope or other proof of the date of mailing, and promptly transmit the document to the Appeals Board. The Division shall, no later than 10 working days from receipt of the Employee Appeal, file with the Appeals Board and serve on each party a clear and concise statement of the reasons why the abatement period prescribed by it is reasonable.

Employee Appeal Forms are available from the Appeals Board, or from a district office of the Division.

Employees Participation in Informal Conference - Affected employees or their representatives may notify the District Manager that they wish to attend the informal conference. If the employer objects, a separate informal conference will be held.

DISABILITY ACCOMMODATION

Disability accommodation is available upon request. Any person with a disability requiring an accommodation, auxiliary aid or service, or a modification of policies or procedures to ensure effective communication and access to the programs of the Division of Occupational Safety and Health, should contact the Disability Accommodation Coordinator at the local district office or the Statewide Disability Accommodation Coordinator at 1-866-326-1616 (toll free). The Statewide Coordinator can also be reached through the California Relay Service, by dialing 711 or 1-800-735-2929 (TTY) or 1-800-855-3000 (TTY - Spanish).

Accommodations can include modifications of policies or procedures or provision of auxiliary aids or services. Accommodations include, but are not limited to, an Assistive Listening System (ALS), a Computer-Aided Transcription System or Communication Access Realtime Translation (CART), a sign-language interpreter, documents in Braille, large print or on computer disk, and audio cassette recording. Accommodation requests should be made as soon as possible. Requests for an ALS or CART should be made no later than five (5) days before the hearing or conference.

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

Inspection #: 1823730
Inspection Dates: 05/08/2025 - 10/31/2025
Issuance Date: 10/31/2025
CSHO ID: P0550
Optional Report #: 24

Citation and Notification of Penalty

Company Name: Mojave Solar Project
Establishment DBA:
and its successors
Inspection Site: 42134 Harper Lake Road
Hinkley, CA 92347

Citation 1 Item 1 Type of Violation: **General**

CA Title 8 CCR 3203(a)(4)(7):
(a) Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program (Program). The Program shall be in writing and, shall, at a minimum:
(4) Include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards:
(7) Provide training and instruction:

Instance 1:
Prior to and during the course of inspection, including but not limited to 5/8/2025, the employer failed to identify and evaluate hazards including but not limited to the reclosing of circuit breakers after a trip.

Instance2:
Prior to and during the course of inspection, including but not limited to 5/8/2025 the employer failed to provide needed training including but not limited to training electricians on the construction and operation of the electric equipment and installations on site and the hazards involved.

Date By Which Violation Must be Abated: **Corrected During Inspection**
Proposed Penalty: **$605.00**

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

Inspection #: 1823730
Inspection Dates: 05/08/2025 - 10/31/2025
Issuance Date: 10/31/2025
CSHO ID: P0550
Optional Report #: 24

Citation and Notification of Penalty

Company Name: Mojave Solar Project
Establishment DBA:
and its successors
Inspection Site: 42134 Harper Lake Road
Hinkley, CA 92347

Citation 1 Item 2 Type of Violation: **General**

CA Title 8 CCR 3221(b)(1):
(b) Elements. The following elements, at a minimum, shall be included in the fire prevention plan:

(1) Potential fire hazards and their proper handling and storage procedures, potential ignition sources (such as welding, smoking and others) and their control procedures, and the type of fire protection equipment or systems which can control a fire involving them;

Prior to and during the course of inspection, including but not limited to 5/8/2025, the employer failed to identify potential ignition sources, their control procedures, and the type of equipment or systems that could control the fires employees could be exposed to in the solar fields.

Date By Which Violation Must be Abated: **Corrected During Inspection**
Proposed Penalty: **$605.00**

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

Inspection #: 1823730
Inspection Dates: 05/08/2025 - 10/31/2025
Issuance Date: 10/31/2025
CSHO ID: P0550
Optional Report #: 24

Citation and Notification of Penalty

Company Name: Mojave Solar Project
Establishment DBA:
and its successors
Inspection Site: 42134 Harper Lake Road
Hinkley, CA 92347

Citation 1 Item 3 Type of Violation: **General**

CA Title 8 CCR 2340.24:
When a circuit is abandoned or discontinued, its conductors shall be removed from the raceways, or be maintained as if in use.

Prior to and during the course of inspection, including but not limited to 5/8/2025, the employer failed to either remove abandoned circuit conductors from raceways or maintain them as if in use at both their Alpha plant and the Beta plant.

Date By Which Violation Must be Abated: **Corrected During Inspection**
Proposed Penalty: **$160.00**

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

Inspection #: 1823730
Inspection Dates: 05/08/2025 - 10/31/2025
Issuance Date: 10/31/2025
CSHO ID: P0550
Optional Report #: 24

Citation and Notification of Penalty

Company Name: Mojave Solar Project
Establishment DBA:
and its successors
Inspection Site: 42134 Harper Lake Road
Hinkley, CA 92347

Citation 1 Item 4 Type of Violation: **General**

CA Title 8 CCR 2783:
Metal-clad cable shall be permitted to be installed on metal racks, trays, troughs, or continuous rigid cable supports which are effectively grounded. Each cable shall be supported at intervals not exceeding 6 feet and within 2 feet of every box or fitting, and each cable shall be attached to the support at intervals of not more than 10 feet horizontally and 2 feet vertically.

Prior to and during the course of inspection, including but not limited to 5/8/2025, the employer failed to ensure that a metal-clad cable operating at greater than 600 volts installed in a vertical cable tray at their Beta Plant was secured at least every 2 feet.

Date By Which Violation Must be Abated: **Corrected During Inspection**
Proposed Penalty: **$240.00**

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

Inspection #: 1823730
Inspection Dates: 05/08/2025 - 10/31/2025
Issuance Date: 10/31/2025
CSHO ID: P0550
Optional Report #: 24

Citation and Notification of Penalty

Company Name: Mojave Solar Project
Establishment DBA:
and its successors
Inspection Site: 42134 Harper Lake Road
Hinkley, CA 92347

Citation 2 Item 1 Type of Violation: **Serious**

CA Title 8 CCR 3314(g)(2)(A):
(a) Application.
(3) Requirements for working on energized electrical systems are prescribed in Sections 2320.1 through 2320.9 or 2940 through 2945.
(g) Hazardous Energy Control Procedures. A hazardous energy control procedure shall be developed and utilized by the employer when employees are engaged in the cleaning, repairing, servicing, setting-up or adjusting of prime movers, machinery and equipment.
(2) The employer's hazardous energy control procedures shall be documented in writing.
(A) The employer's hazardous energy control procedure shall include separate procedural steps for the safe lockout/tagout of each machine or piece of equipment affected by the hazardous energy control procedure.

Reference 3314(a)(3)
Prior to and during the course of inspection, including but not limited to 5/8/2025, the employer failed to develop a written Hazardous Energy Control Procedure that meet the requirements of the regulation for working on energized electrical systems and failed to include procedural steps for the safe lockout/tagout of each machine or piece of equipment affected by the hazardous energy control procedure.

Date By Which Violation Must be Abated: **Corrected During Inspection**
Proposed Penalty: **$7313.00**

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

Inspection #: 1823730
Inspection Dates: 05/08/2025 - 10/31/2025
Issuance Date: 10/31/2025
CSHO ID: P0550
Optional Report #: 24

Citation and Notification of Penalty

Company Name: Mojave Solar Project
Establishment DBA:
and its successors
Inspection Site: 42134 Harper Lake Road
Hinkley, CA 92347

Citation 3 Item 1 Type of Violation: **Serious**

Title 8 CCR 2940.13(c):
(c) Hazardous Energy Control Procedures. Written procedures shall be developed, documented, and used for the control of potentially hazardous energy covered by subsection (a) of this section.
(1) The procedure shall clearly and specifically outline the scope, purpose, responsibility, authorization, rules, and techniques to be applied to the control of hazardous energy, and the measures to enforce compliance including, but not limited to, the following:
(A) A specific statement of the intended use of this procedure;
(B) Specific procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy;
(C) Specific procedural steps for the placement, removal, and transfer of lockout devices or tagout devices and the responsibility for them;
(D) Specific requirements for testing a machine or equipment to determine and verify the effectiveness of lockout devices, tagout devices, and other energy control measures; and
(E) The employer's hazardous energy control procedure shall include separate procedural steps for the safe lockout/tagout of each machine or piece of equipment affected by the hazardous energy control procedure.

Prior to and during the course of inspection, including but not limited to 5/8/2025, the employer failed to develop a written procedure for the control of potentially hazardous energy that meets the requirements of the regulations specific for electrical work with machines or equipment that operate at a level of 600 volts or greater.

Date By Which Violation Must be Abated: **Corrected During Inspection**
Proposed Penalty: **$7310.00**

Marty Felts
Compliance Officer

Robert Delgado
Senior Safety Engineer

State of California
Department of Industrial Relations
Division of Occupational Safety and Health
San Bernardino District Office
464 West 4th Street, Suite 332
San Bernardino, CA 92401
Phone: (909) 383-4321 Fax: (909) 383-6789

NOTICE OF PROPOSED PENALTIES

Company Name: Mojave Solar Project
Establishment DBA:
and its successors
Inspection Site: 42134 Harper Lake Road, Hinkley, CA 92347
Mailing Address: 42134 Harper Lake Road, Hinkley, CA 92347
Issuance Date: 10/31/2025
Reporting ID: 0950633
CSHO ID: P0550

Summary of Penalties for Inspection Number 1823730

Citation 1 Item 1, General	$605.00
Citation 1 Item 2, General	$605.00
Citation 1 Item 3, General	$160.00
Citation 1 Item 4, General	$240.00
Citation 2 Item 1, Serious	$7313.00
Citation 3 Item 1, Serious	$7310.00
TOTAL PROPOSED PENALTIES:	**$16233.00**

Penalties are due within 15 working days of receipt of this notification unless contested. If you are appealing any item of this citation, remittance is still due on all items that are not appealed. Enclosed for your use is a Penalty Remittance Form.

If you are paying electronically: Please have this form on-hand when you are ready to make your payment. The company name, reporting ID and Citation number(s) will be required to ensure that the payment is accurately posted to your account. Please go to: **www.dir.ca.gov/dosh/CalOSHA_PaymentOption.html** to access the secure payment processing site. **Additionally, you must also mail the Penalty Remittance Form to the address below.**

If you are paying by check: Mail this Notice of Proposed Penalties, the Penalty Remittance Form, along with a copy of the Citation and Notification of Penalty to:

DEPARTMENT OF INDUSTRIAL RELATIONS
CAL/OSHA PENALTIES
P. O. BOX 516547
LOS ANGELES, CA 90051-0595

Cal/OSHA does not agree to any restrictions, conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions, conditions or endorsements do not exist.

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH – CAL/OSHA
Accounting Office - Cashiering Unit
Phone (415) 703-4325
Email: AccountingCalosha@dir.ca.gov

PENALTY REMITTANCE FORM

CIVIL PENALTY INFO	**INSPECTION NO.:**	1823730	**REPORTING ID:**	0950633
COMPANY NAME:	Mojave Solar Project		**FEIN/SEIN:**	
ESTABLISHMENT DBA:				
CONTACT PERSON:	Mahnaz Ghamati			
PHONE NO.:	(760) 498-0549	Email: Mahnaz.Ghamati@atlantica.com	**FAX NO.:**	
SITE ADDRESS:	42134 Harper Lake Road, Hinkley, CA 92347			
MAILING ADDRESS:	42134 Harper Lake Road, Hinkley, CA 92347			

CITATION INFORMATION:

Penalties are due within 15 working days of receipt of this notification unless contested. If you are appealing any item of this Citation, remittance is still due on all items that are not appealed.

PAYMENT INSTRUCTIONS:

For check or money order: please make check or money order payable to Department of Industrial Relations. Write the inspection number and total amount enclosed on the payment coupon below and on the check or money order.

For credit card or EFT payment, go to: www.dir.ca.gov/dosh/CalOSHA_PaymentOption.html

----- Detach here and return bottom portion with check or money order payment -----

PAYMENT COUPON

DIR State of California Department of Industrial Relations EST. 1927

Inspection No.: 1823730

Amount Enclosed: $ _____

Mail payment to:

DEPARTMENT OF INDUSTRIAL RELATIONS
CAL/OSHA PENALTIES
P.O. BOX 516547
LOS ANGELES, CA 90051-0595

For credit card or EFT payment, go to:
www.dir.ca.gov/dosh/CalOSHA_PaymentOption.html

English

MULTI-LINGUAL EMPLOYEE NOTIFICATION– Post as required by LC § 6318(c)

Cal/OSHA investigated the workplace and found one or more workplace safety or health violations. This investigation resulted in one or more citations or orders, which the employer must post **at or near the place of the violation for three working days**, or until the unsafe condition is corrected, whichever is longer. Your employer is required to communicate any hazards at the workplace in a language and manner you understand. You can contact Cal/OSHA at **833-579-0927**. You can search for citations Cal/OSHA issued against your employer at https://www.osha.gov/ords/imis/establishment.html

Español

NOTIFICACIÓN A LOS EMPLEADOS MULTILINGÜES– Publicar según lo requerido por LC § 6318(c)

Cal/OSHA investigó el lugar de trabajo y encontró una o más violaciones de seguridad o salud en el lugar de trabajo. Como resultado de esta investigación se generaron una o más citaciones u órdenes, que el jefe debe fijar **en o cerca del lugar de la violación por tres días laborables** o hasta que se corrija la condición insegura, cualquiera que sea el caso que se prologue más. Su jefe está obligado a comunicarle cualquier peligro en el lugar de trabajo en los términos y de una forma que le sean claros. Puede contactar a Cal/OSHA al número de teléfono **833-579-0927**. Puede buscar citaciones que Cal/OSHA haya emitido en contra de su jefe en https://www.osha.gov/ords/imis/establishment.html

Punjabi

ਬਹੁ-ਭਾਸ਼ੀ ਕਰਮਚਾਰੀ ਅਧਿਸੂਚਨਾ – LC § 6318(c) ਦੀ ਲੋੜ ਅਨੁਸਾਰ ਪੋਸਟ ਕਰੋ

Cal/OSHA ਨੇ ਕਾਰਜ-ਸਥਾਨ ਦੀ ਜਾਂਚ ਕੀਤੀ ਅਤੇ ਕਾਰਜ-ਸਥਾਨ 'ਤੇ ਇੱਕ ਜਾਂ ਜ਼ਿਆਦਾ ਸੁਰੱਖਿਆ ਜਾਂ ਸਿਹਤ ਸੰਬੰਧੀ ਉਲੰਘਣਾਵਾਂ ਪਾਈਆਂ। ਇਸ ਜਾਂਚ ਦਾ ਸਿੱਟਾ ਇੱਕ ਜਾਂ ਵਧੇਰੇ ਹਵਾਲਿਆਂ ਜਾਂ ਆਦੇਸ਼ਾਂ ਦੇ ਰੂਪ ਵਿੱਚ ਨਿਕਲਿਆ, ਜਿੰਨ੍ਹਾਂ ਨੂੰ ਰੁਜ਼ਗਾਰਦਾਤਾ ਨੂੰ ਲਾਜ਼ਮੀ ਤੌਰ 'ਤੇ **ਉਲੰਘਣਾ ਵਾਲੇ ਸਥਾਨ 'ਤੇ ਜਾਂ ਇਸਦੇ ਨੇੜੇ ਤਿੰਨ ਕੰਮਕਾਜੀ ਦਿਨਾਂ ਵਾਸਤੇ**, ਜਾਂ ਜਦੋਂ ਤੱਕ ਅਸੁਰੱਖਿਅਤ ਅਵਸਥਾ ਨੂੰ ਠੀਕ ਨਹੀਂ ਕਰ ਲਿਆ ਜਾਂਦਾ, ਦੋਹਾਂ ਵਿੱਚੋਂ ਜੋ ਵੀ ਲੰਬਾ ਹੋਵੇ, ਪੋਸਟ ਕਰਨਾ ਲਾਜ਼ਮੀ ਹੈ। ਤੁਹਾਡੇ ਰੁਜ਼ਗਾਰਦਾਤਾ ਤੋਂ ਉਮੀਦ ਕੀਤੀ ਜਾਂਦੀ ਹੈ ਕਿ ਉਹ ਕਾਰਜ-ਸਥਾਨ 'ਤੇ ਕਿਸੇ ਵੀ ਜ਼ੋਖਮ ਬਾਰੇ ਅਜਿਹੀ ਭਾਸ਼ਾ ਅਤੇ ਤਰੀਕੇ ਨਾਲ ਸੰਚਾਰ ਕਰਨ, ਜਿਸਨੂੰ ਤੁਸੀਂ ਸਮਝਦੇ ਹੋ। ਤੁਸੀਂ **833-579-0927** 'ਤੇ Cal/OSHA ਨਾਲ ਸੰਪਰਕ ਕਰ ਸਕਦੇ ਹੋ। Cal/OSHA ਵੱਲੋਂ

ਤੁਹਾਡੇ ਰੁਜ਼ਗਾਰਦਾਤਾ ਦੇ ਖਿਲਾਫ਼ ਜਾਰੀ ਕੀਤੇ ਹਵਾਲਿਆਂ ਲਈ ਤੁਸੀਂ

https://www.osha.gov/ords/imis/establishment.html 'ਤੇ ਦੇਖ ਸਕਦੇ ਹੋ।

Vietnamese

THÔNG BÁO CHO NHÂN VIÊN ĐA NGÔN NGỮ- Đăng theo yêu cầu của LC § 6318(c)

Cal/OSHA đã điều tra nơi làm việc và phát hiện một hay nhiều vi phạm về an toàn hoặc sức khỏe tại nơi làm việc. Cuộc điều tra này đã dẫn đến việc đơn vị sử dụng lao động phải niêm yết một hay nhiều mệnh lệnh hoặc lệnh tại hoặc gần nơi vi phạm trong ba ngày làm việc hoặc cho đến khi tình trạng không an toàn được khắc phục, tùy theo thời gian nào lâu hơn. Đơn vị sử dụng lao động của bạn được yêu cầu thông báo về mọi mối nguy hiểm tại nơi làm việc bằng ngôn ngữ và cách thức mà bạn có thể hiểu. Bạn có thể liên hệ với Cal/OSHA theo số điện thoại **833-579-0927**. Bạn có thể tìm kiếm mệnh lệnh mà Cal/OSHA ban hành cho đơn vị sử dụng lao động của bạn tại https://www.osha.gov/ords/imis/establishment.html

Korean

다국어로 된 직원대상 알림– **LC § 6318(c)** 의거 명령에 따라 게시

Cal/OSHA 가 작업장을 조사한 결과 하나 이상의 작업장 안전 또는 보건관련 위반 사항을 발견했습니다. 그 결과 하나 이상의 소환장 또는 명령이 내려졌으며, 이에 따라 고용주는 **위반 장소나 그 근처에 근무일 기준 3 일 동안,** 또는 불안전한 상태가 시정될 때까지(둘 중 더 긴 기간 적용) 이를 게시해야 합니다. 귀하의 고용주는 귀하가 이해할 수 있는 언어와 방식으로 작업장에서 일어날 수 있는 위험을 전달해야 합니다. 귀하는 **833-579-0927** 로 Cal/OSHA 에 연락하실 수 있습니다. 또한 https://www.osha.gov/ords/imis/establishment.html 에서 귀하 고용주를 대상으로 발행된 Cal/OSHA 소환장을 검색하실 수 있습니다.

Armenian

ԲԱՀՄԱԼԵԶՈՒ ԱՇԽԱՏԱԿՑԻ ԾԱՆՈՒՑՈՒՄ – Գրառում, ինչպես պահանջվում է LC § 6318(c) կողմից

Cal/OSHA-ն ուսումնասիրել է աշխատավայրը և հայտնաբերել աշխատավայրի անվտանգության կամ առողջության մեկ կամ մի քանի խախտում: Այս ուսումնասիրությունը հանգեցրել է նրան, որ գործատուն պետք է տեղադրի մեկ կամ մի քանի ծանուցում կամ **երեք աշխատանքային օրվա ընթացքում** կարգադրություն տեղադրի **խախտման վայրում կամ վայրի մոտ** կամ մինչև անապահով պայմանը շտկվի, որն ավելի երկար կտևի: Ձեր գործատուից պահանջվում է տեղեկացնել Ձեզ աշխատավայրում ցանկացած վտանգի մասին Ձեզ հասկանալի լեզվով և ձևով: Դուք կարող եք կապվել Cal/OSHA-ի հետ **833-579-0927** հեռախոսահամարով: Դուք կարող եք փնտրել Ձեր գործատուի դեմ տրված Cal/OSHA ծանուցումները հետևյալ կայքում՝ https://www.osha.gov/ords/imis/establishment.html

Tagalog

ABISO SA EMPLEYADO NA NASA MARAMING WIKA– Ipaskil ayon sa Kinakailangan ng LC § 6318(c)

Inimbestigahan ng Cal/OSHA ang lugar ng trabaho at may nakitang isa o higit pang mga paglabag sa kaligtasan sa lugar ng trabaho o kalusugan. Nagresulta ang imbestigasyon na ito ng isa o higit pang pagbanggit o pag-uutos, na dapat ipaskil ng amo **sa o malapit sa lugar ng paglabag sa loob ng tatlong araw ng trabaho**, o hanggang sa maiwasto ang hindi ligtas na kondisyon, alinman ang mas matagal. Kinakailangan ng iyong amo na sabihin ang anumang panganib sa lugar ng trabaho sa wika at paraan na nauunawaan mo. Maaari kang makipag-ugnay sa Cal/OSHA sa **833-579-0927**. Maaari mong hanapin ang mga pagbanggit na ibinigay ng Cal/OSHA laban sa iyong amo sa https://www.osha.gov/ords/imis/establishment.html

Simplified Chinese

根据 LC § 6318(c) 的要求发布多语言雇员通知

Cal/OSHA 对工作场所进行了调查，发现了一项或多项工作场所安全或健康违规行为。这项调查导致一份或多份传讯或命令，雇主必须**在违规地点或附近张贴三个工作日，或者直到不安全状况得到**纠正，以时间较长者为准。你的雇主必须以你理解的语言和方式传达工作场所的任何危险。你可以通过 **833-579-0927** 联系 Cal/OSHA。你可以搜索 Cal/OSHA 发布针对你的雇主的传讯，就在 https://www.osha.gov/ords/imis/establishment.html

Traditional Chinese

根據 LC § 6318(c) 的要求發佈多語言雇員通知

Cal/OSHA 對工作場所進行了調查，發現了一項或多項工作場所安全或健康違規行為。這項調查導致一份或多份傳訊或命令，雇主必須**在違規地點或附近張貼三個工作日，**或者直到不安全狀況得到糾正，以時間較長者為准。你的雇主必須以你理解的語言和方式傳達工作場所的任何危險。你可以通過撥打 **833-579-0927** 聯繫 Cal/OSHA。你可以搜索 Cal/OSHA 發佈針對你的雇主的傳訊，就在 https://www.osha.gov/ords/imis/establishment.html

Payment Confirmation

Please take note of the confirmation number or print this page for your records.

Confirmation Number is: **8700951**

Payment Submission Date and Time (PST): 11/4/2025 Time: 12:01:48 PM

DIR Claim # :	1823730
Payment Type :	OSHA Penalty Assessment
Invoice Amount :	$16,233.00
Other Amount :	$0.00
Total Amount :	$16,233.00
Bank Debit Date :	11/05/2025
Bank Account :	*****6072

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: **09-AFC-5C**
Condition Number: **COPM 10**
Description: **Notice of Violation of Waste Discharge Prohibitions and California Water Code section 13243**
Submittal Number: **COMP10-010-00**

August 26, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov
Submitted electronically via email

Ms. Gutierrez,

Pursuant to Condition of Compliance 10, this letter serves as formal notification to the California Energy Commission regarding a Notice of Violation (NOV) issued to the Mojave Solar Project (MSP) by the Lahontan Regional Water Quality Control Board.

The NOV dated August 18, 2025, references findings from the Environmental Site Investigation Report prepared by Hushmand Associates, Inc. and submitted by MSP in October 2024. The Lahontan Water Board staff alleges a violation of Waste Discharge Prohibitions and California Water Code section 13243 due to the unauthorized discharge of heat transfer fluid compounds into the Harper Valley Groundwater Basin from the Alpha East Land Treatment Unit (LTU).

Required Response Actions:

1. Immediate Covering of LTU

   MSP must cover the LTU with plastic sheeting (or an approved alternative) to prevent precipitation infiltration. The cover must remain in place until cleanup goals are met.

2. Submission of Workplan

   A workplan must be submitted by Monday, November 17, 2025, to delineate the

release to groundwater and remove secondary contamination sources. The workplan must be prepared, signed, and stamped by a qualified California-licensed Professional Geologist or Professional Engineer.

MSP Response:

- The Alpha East LTU has been covered with a liner; the photo is attached for reference.

- MSP is actively working with a qualified geological consultant to prepare the required workplan for the corrective actions.

We will include you in the communications with the Lahontan Water Board staff to ensure you are informed of all correspondence and progress.

Please let me know if you need any additional documentation or clarification.

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

August 18, 2025 GeoTracker Global ID: T10000005850

Mahnaz Ghamati
Quality, Environmental & Compliance Manager
Atlantica Sustainable Infrastructure LLC
43134 Harper Lake Toad
Hinkley, CA 93247
Mahnaz.ghamati@atlantica.com

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7017 1450 0001 3059 1819

Notice of Violation of Waste Discharge Prohibitions and California Water Code section 13243, Mojave Solar Facility, 43134 Harper Lake Road, Hinkley, San Bernardino County

The purpose of this Notice is to inform Mojave Solar LLC, subsidiary of Atlantica Inc., that Lahontan Regional Water Quality Control Board (Lahontan Water Board) staff is alleging a violation of Waste Discharge Prohibitions and California Water Code section 13243 for an unauthorized discharge of heat transfer fluid compounds to the Harper Valley Groundwater Basin from the Alpha East Land Treatment Unit (LTU). Lahontan Water Board staff discovered the alleged violation during review of the *Environmental Site Investigation Report*, prepared by Hushmand Associates, Inc. (dated October 2024). This violation is subject to additional enforcement, including administrative civil liability (fine) up to $10,000 for each day in which the violation occurs pursuant to California Water Code section 13385(c). Your response to this Notice will be taken into consideration by Lahontan Water Board staff when determining what, if any, additional enforcement to take.

VIOLATION

Unauthorized discharge of waste including biphenyl, diphenyl oxide and toluene to groundwater. Violation of Waste Discharge Prohibition II.A.1. and II.B.4., and California Water Code section 13243.

REQUIRED RESPONSE ACTIONS

1. Immediately cover the LTU with plastic sheeting (or alternative) to prevent infiltration of precipitation through the waste management unit. The covering must remain until cleanup goals have been achieved.

2. Submit a workplan by **Monday, November 17, 2025** to delineate the release to groundwater and remove secondary sources to groundwater contamination.

A. Signatory Requirements: The workplan must be prepared, signed, and stamped by an appropriately experienced California-licensed Professional Geologist or Professional Engineer.

B. Elements to be Included: Include the following items in the workplan:

a. Site Map: A map that graphically depicts the step-out locations where drilling and sampling will be conducted. Include the known direction of groundwater flow and gradient. Show the locations where the previous soil, soil vapor, and groundwater samples were collected to investigate the release from the LTU.

b. Tabulated Analytical Data: Tabulated analytical data for soil, soil vapor and groundwater that has been collected from the LTU.

c. Soil Vapor Sampling Information: A copy of the batch canister certification report for each vapor sampling canister and the name of the leak check compound used during sampling on July 18, 2024.

d. Sampling and Analysis Plan: A sampling and analysis plan (SAP) for groundwater, soil and soil vapor including the list of constituents to be analyzed, method of sample collection, depth of sample collection, frequency of sample collection and the name and certification of the analytical laboratory. Include the expected reporting limits and laboratory analytical method detection limits obtainable by the analytical laboratory.

e. Drilling Method: The proposed drilling method to collect samples and soil vapor probes.

f. Land Treatment Unit Construction Details: The as-built construction drawings for the land treatment units and a narrative discussion of deviations from the original plans.

g. Secondary Source Removal System: A proposed strategy to remove the chemical compounds in soil that are affecting groundwater.

C. Soil Logging: Log soil lithology according to the Unified Soil Classification System (USCS) using an appropriately experienced and California-licensed Professional Geologist or Professional Engineer.

D. Investigation Derived Waste Handling: Containerize and clearly labeled all investigation derived waste pending transport for offsite disposal. Label the containers in a manner that is easily interpreted by emergency response personnel as to the contents of the container. Remove the containers from the Site within 90 days of waste generation.

E. Permitting: Obtain boring permits prior to commencement of the approved scope of work.

3. Alternatively, if you believe that you have received this Notice in error, or that any of the information provided in this Notice is incorrect or incomplete, submit a written response explaining your position.

ADDITIONAL ENFORCEMENT

The Lahontan Water Board takes the above-referenced violation very seriously, as indicated by the significant fines that can be imposed for such violations. Additional days of violation will continue to accumulate until the conditions resulting in the alleged violations are corrected. As set forth above, your response to this Notice will be taken into consideration when staff is determining whether to take additional enforcement actions, including referring this case to the State Water Resources Control Board's (State Water Board) Office of Enforcement for legal action.

Electronic document submittal is required. Please upload all documents and correspondence regarding this case to the State Water Resources Control Board GeoTracker Data Management System under Global ID T10000005850.

If you have any questions regarding this notice, please contact Case Manager Kerri O'Keefe, Engineering Geologist, at (530) 542-5473 (kerri.okeefe@waterboards.ca.gov), or me at (530) 542-5420 (jeff.brooks@waterboards.ca.gov).

Jeff Brooks, PG
Senior Engineering Geologist
Chief – Cleanup, Site Investigation & Enforcement Unit

cc: Ashley Gutierrez, California Energy Commission
James Ackerman, California Energy Commission
Hurshbir Shahi, California Energy Commission
Alex Mayer, California Energy Commission
Timothy Middlemis-Clark, Lahontan Water Board
Shelby Barker, Lahontan Water Board
Kerri O'Keefe, Lahontan Water Board

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: **09-AFC-5C**
Condition Number: **COPM 10**
Description: **Notice of Violation of Waste Discharge Prohibitions and California Water Code section 13243- Workplan Submission**
Submittal Number: **COMP10-10-01**

October 30, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov
Submitted electronically via email

Ms. Gutierrez,

Pursuant to Condition of Compliance 10, please find attached the "Groundwater Quality Assessment and Contaminated Soil Remediation Work Plan," which was submitted to the Lahontan Regional Water Quality Control Board on October 23, 2025, in response to the Notice of Violation (NOV) dated August 18, 2025.

The NOV references findings from the Environmental Site Investigation Report prepared by Hushmand Associates, Inc., submitted by MSP in October 2024. The Lahontan Water Board staff alleges a violation of Waste Discharge Prohibitions and California Water Code Section 13243 due to the unauthorized discharge of heat transfer fluid compounds into the Harper Valley Groundwater Basin from the Alpha East Land Treatment Unit (LTU).

Please let me know if you need any additional documentation or clarification.

Sincerely,
Mahnaz Ghamati

Quality, Environmental & Compliance Manager

Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Mojave Solar Project
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Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

Attachment: Groundwater Quality Assessment and Contaminated Soil Remediation Work Plan

GROUNDWATER QUALITY ASSESSMENT AND CONTAMINATED SOIL REMEDIATION WORK PLAN

ALPHA EAST BIOREMEDIATION UNIT

MOJAVE SOLAR PLANT NEAR HINKLEY, CALIFORNIA

Prepared for:

ATLANTICA Sustainable Infrastructure
Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347

Prepared by

250 Goddard
Irvine, California 92618
(949) 777-1266

October 2025

HUSHMAND ASSOCIATES, INC.
Geotechnical and Earthquake Engineers

Hushmand Associates, Inc.
250 Goddard
Irvine, CA 92618

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October 15, 2025

Mojave Solar LLC
Mojave Solar Project
42134 Harper Lake Road
Hinkley, California 92347

Attention: Ms. Mahnaz Ghamati, Quality, Environmental & Compliance Manager

Subject: **Workplan: Groundwater Quality Assessment and Contaminated Soil Removal and Disposal, Alpha East Land Treatment Unit (LTU)**
Mojave Solar Plant, Hinkley, California
For Submittal to Agencies

Dear Ms. Ghamati:

Hushmand Associates, Inc. (HAI) is pleased to provide this Groundwater Monitoring and Site Remediation Workplan (Workplan) to address the groundwater quality assessment adjacent to Alpha East Land Treatment Unit (LTU) and contaminated soil removal and replacement with compacted clean soil at Alpha East LTU at the Mojave Solar Plant (MSP) near Hinkley, California (**Figure 1**). This Workplan has been prepared in response to a Notice of Violation (NOV) letter dated August 18, 2025, issued by the California Regional Water Board – Lahontan Region (RWB) in response to the accidental discharge of waste to groundwater (violation of Waste Discharge Prohibition II.A.1. and II.B.4., and California Water Code section 13243.), CEC's comments received via MS email dated August 26, 2025, and the virtual meeting between RWB, CEC, MS, and HAI on September 24, 2025. A copy of the NOV is included in **Attachment A**.

1.0 INTRODUCTION

A Sampling and Analysis Plan (SAP) for the Alpha East Bioremediation Unit, dated June 21, 2024, was prepared by HAI and submitted to MS and the agencies. The SAP included total of 6 soil borings (B1 through B6) within the Alpha East LTU for collection of soil and soil vapor samples for laboratory analysis. Refer to **Figure 2a** for the locations of soil borings. The SAP also proposed extending the soil boring B6 to groundwater, expected to be around 33-35 ft below ground surface (bgs), and collecting a grab sample of groundwater using a hydropunch sampler for laboratory testing. The SAP was submitted for review and approval to MS and the agencies.

Upon approval of the SAP, HAI conducted the field work which was completed during June and July of 2024. During the field investigation, perched groundwater was encountered in soil boring B6 at a depth of 40-41.5 feet bgs. A grab sample of the perched groundwater was collected for

laboratory analysis. Based on the analytical results, the grab groundwater sample collected in soil boring B6 contained 280 ug/L Biphenyl, 990 ug/L Diphenyl Oxide, Toluene at 8.3 ug/L, and MBAS at 0.33 ug/L. Soil samples were also collected from B6 for laboratory analysis. Based on the analytical test results, with the exception of soil sample collected at the 6 feet depth interval of B6 which contained Biphenyl and Diphenyl Oxide at concentrations of 1800 ug/L and 5100 ug/L, the remaining samples collected from the depths of 11 feet, 16 feet and 41 feet of the soil boring B6 did not contain HTF and any other VOCs at reportable concentrations. Copies of the tables containing the analytical test results for soil, and grab groundwater samples from B6 are attached as **Attachment B** to this Workplan for reference. HAI documented the results of the SAP in a report entitled "Environmental Site Investigation Report", dated October 2024, and submitted the report to MS for review and submittal to the RWB and CEC.

Upon review of the October 2024 Report, the RWB issued a NOV letter dated August 18, 2025, requiring response actions to include; immediately covering the LTU with plastic sheeting (or alternative) to prevent infiltration of precipitation through the waste management unit, to keep the cover in place until cleanup goals have been achieved, and submit a workplan by Monday, November 17, 2025 to delineate the release to groundwater and remove secondary sources to groundwater contamination.

MSP confirmed that, upon receipt of the NOV, a liner was promptly installed at the Alpha East LTU and photographic documentation was provided to both the RWB and CEC.

MS requested HAI to help develop the workplan for corrective action. To align the corrective action with the CEC and RWB expectations, a virtual Teams meeting was held on September 24, 2025, between MS, HAI, CEC, and RWB. It was agreed to perform groundwater sampling using combination of drill rig and hydro punch to collect two groundwater samples at two locations, downstream of Alpha East LTU as shown in **Figures 2a and 2b** prior to installation of two long-

term permanent groundwater monitoring wells. After analyzing the results of the groundwater samples from hydropunch locations, the proposed locations of the two new monitoring wells will be re-evaluated and adjusted accordingly. The two new monitoring wells will be installed on the upgradient and downgradient sides of Alpha East LTU. Soil excavation, removal, handling, and replacement with clean soil in Alpha East LTU were also discussed during the virtual meeting and are addressed later in this Workplan.

This Workplan has been prepared in response to the RWB's comments in the above-referenced NOV, the CEC comments, and the September 24, 2025, virtual meeting and includes the following information:

Site Maps: A site map showing the locations of previous soil, soil vapor, and groundwater sample collections, the estimated groundwater flow directions, and the proposed locations of the recommended hydropunch groundwater samples and new perched groundwater monitoring wells.

Tabulated Analytical Data: Tabulated analytical data for soil, soil vapor and groundwater that has been collected from the LTU during 2024 Alpha LTU investigation.

Soil Vapor Sampling Information: A copy of the batch canister certification report for each vapor sampling canister with the name of the leak check compound used during sampling on July 18, 2024 is included as **Attachment C** in this Workplan.

Sampling and Analysis: Descriptions of soil and groundwater sampling procedures, a list of constituents to be analyzed, and the name and certification of the analytical laboratory is described in this Workplan.

Drilling, logging, and Well Installation: Descriptions of the proposed drilling method for the installation of hydro punch and the perched groundwater wells, soil logging procedures, and the proposed groundwater well construction design.

Land Treatment Unit Construction Details: The original design drawings provided by MS are included in Attachment D of this Workplan. We do not have access to the CQA documentation for LTU construction, to discuss the deviations from the original plans.

Excavation of Contaminated Soils: Description of the excavation and removal of contaminated soils from above and beneath the bentomat clay liner for stockpiling based on the field PID screening, for onsite use or offsite disposal based on laboratory results.

2.0 SITE INFORMATION

2.1 Site Location

The Mojave Solar Plant (MSP) is located east and west of Harper Lake Road and north and south of Lockhart Road near Hinkley, San Bernardino County, California. The property includes Section 33 and portions of Sections 28, 29, 30, and 32 within Township 11 North, Range 4 West, San Bernardino Base and Meridian (Figures 1 and 2). The site is relatively level with a gentle slope toward Harper Lake to the northeast. Surface elevations at the project site range from approximately 2,100 feet mean sea level (msl) at the southwestern area of the site to approximately 2,025 feet msl at the northeastern portion of the site close to Harper Lake.

The MSP consists of two independently operable solar fields referred to as Alpha and Beta, each feeding a 140-megawatt (gross) power island. The Alpha and Beta plants are located to the north and south of Lockhart Road, respectively. Each solar field has 1,128 parabolic trough collectors, consisting of support structures, mirrors, receiver tubes, and drive systems. The sun provides 100% of the power supplied to the project through solar-thermal collectors.

The waste facilities at the MSP include two pairs of evaporation ponds and two associated LTUs. The evaporation ponds and LTUs comprise the waste management units (WMUs) to be monitored per the Detection Monitoring Program (DMP).

One pair of evaporation ponds and an associated LTU are associated with the Alpha plant and the second pair of ponds and an LTU are associated with Beta plant. One of the two LTUs is located west of the Alpha ponds, and the second one is located east of the Beta ponds. Each LTU covers an area of approximately 75 feet by 150 feet. LTUs were constructed with a low permeability base designed to slow the rate of water infiltration in the treatment area. The LTUs are surrounded by 4-feet high reinforced concrete walls, 2-feet of which are above-ground. The perimeter walls and grading are designed to control and prevent stormwater runoff from flowing in or out of the units.

2.2 Site Geology and Hydrogeology

The following sections provide a summary of the MSP regional and local hydrogeology. The locations of groundwater monitoring wells at MSP are shown in **Figure 2b**.

Based on background information, the MSP is located in the Harper Valley Groundwater Basin (HVGB), a sub-basin of the regional Mojave River Basin (MRB). Within the MRB, two aquifers are recognized by the USGS and the Mojave Basin Area Watermaster, commonly referred to as the Floodplain and Regional aquifers. These aquifers are hydraulically connected, with underflow from the Floodplain aquifer to the Regional aquifer. Transmissivity is significantly larger within the Floodplain aquifer than within the Regional aquifer. Regional groundwater flow direction beneath the site has generally been toward the north and northeast at a gradient ranging from 0.001 to 0.02 feet/foot (ft/ft) (MSP, 2009).

A shallow perched groundwater zone underlies the site. Eight groundwater monitoring wells were installed in this perched zone in January 2014 to meet the requirements of the CCR Title 27. Four wells were installed around the perimeter of each evaporation pond (four per pond) to detect possible releases from the evaporation ponds. The DMP wells MWP-A100-400 and MWP-B100-400 are screened in the Quaternary alluvium consisting of sand/silty sand/clayey sand. Well completion report and boring log for nearby groundwater monitoring well MWP-A200 indicates silty fine to coarse sand (SM) ranging with depth from medium dense to very dense to 14 ft below ground surface (bgs), very dense clayey medium to coarse sand (SC) from 14 to 17 ft bgs, a layer of very dense well graded sand (SW) from 17 to 18.5 ft bgs, and very dense silty coarse sand (SM) to 34 ft bgs.

2.3 Land Treatment Units

As described in the Land Treatment Units (LTU) Preliminary Closure/Post Closure Maintenance Plan (MSP, 2014), each LTU covers an area of approximately 75 by 150 feet and is constructed of a base consisting of a liner of Bentomat® geosynthetic clay liner, a bentonite layer, cover soil (min 12“), and an additional 24” of native soil mixed with soil cement on top of the cover soil. This base serves as a competent platform to the land treatment activities and slows the rate of surface water infiltration in the treatment area. The LTUs are used to treat soils impacted by spills of the heat transfer fluid (HTF) used in equipment at the site. The HTF consists of diphenyl oxide (73.5%) and diphenyl (26.5%), as detailed in the attached Safety Data Sheet (SDS). The compacted and native soil beneath the LTU is designated as a “treatment zone.” The LTUs are surrounded on all sides by 2-foot-high reinforced concrete walls. These walls and site grading will control and prevent potential inflow (run-on) of surface storm water into the units or runoff of storm water from the units. The drawings for Alpha LTU is included in **Attachment D**.

The LTU is divided into two sides, East and West, each equipped with three sampling ports for collecting samples per the detection monitoring plan.

2.4 Detected Soil and Groundwater Contamination

Analytical test results on samples taken from depths of 7 to 10 feet on the East side (sample ports E2 and E3) indicated the presence of detectable concentrations of Biphenyl and Diphenyl Oxide. The test results for samples obtained in 2018-2025 time period are provided in **Attachment E** (Table 29b from 2024 Annual DMP report).

3.0 GROUNDWATER QUALITY ASSESSMENT

As required by the RWB, we will install two permanent groundwater monitoring wells, one downgradient within 50 feet of the northern edge of Alpha East LTU, and one upgradient monitoring well within 50 feet of the southern edge of Alpha East LTU, which will later be included in the MSP Detection Monitoring Program (DMP).

During the virtual meeting on September 24, 2025, HAI proposed to install two soil borings at locations shown on **Figures 2a** and **2b**, prior to the installation of the two groundwater monitoring wells, and collect grab groundwater samples for laboratory analysis with the intention of using the laboratory results to help best locate the two new permanent perched groundwater monitoring wells. The proposed initial groundwater sampling and analysis using a hydropunch was verbally agreed upon by CEC and RWB.

The groundwater quality assessment will include the following tasks.

Task 3.1 – Pre-field Activities

Standard Operating Procedures - HAI's Standard Operating Procedures (SOP) will be followed during the field work. A copy of the SOP is included in **Appendix A**.

Health and Safety Plan – A Health and Safety Plan (H&S) has been prepared by HAI, and a copy is included in **Appendix B**. H&S procedures will be followed during the field work. It mainly includes Level D personal protective equipment (PPE) which will be worn by the field crew during soil sampling activities.

Permits - Prior to the start of filed work, HAI will obtain all necessary permits from the San Bernardino County Department of Public Health for the drilling of the two soil borings and collection of grab groundwater samples using a hydropunch, and for the installation of two new perched groundwater monitoring wells.

Staking/Marking Boring Locations - HAI will stake/mark the drilling locations clearly and notify Underground Service Alert (USA) to obtain underground utility clearance.

Underground Utility Clearance – After marking/staking the hydropunch and perched groundwater monitoring well locations, HAI will notify Underground Service Alert (USA) at least 72 hours prior to conducting drilling. For additional safety reasons and to minimize potential liabilities to MS and HAI, HAI recommends the use of geophysical methods (e.g. ground penetrating radar [GPR]) to help locate utilities, if present. HAI will subcontract a private utility locator for completing a geophysical survey of the site so that public or private underground utilities at the proposed boring locations can be identified prior to beginning fieldwork.

Drilling Contractor Selection - HAI will select a qualified driller with C-57 license and extensive experience in installation of monitoring wells in San Bernardino County for the drilling and ground water sampling using hydropunch, and installation of groundwater monitoring well(s).

Brief summaries of the procedures that will be used for the collection of grab groundwater samples using hydropunch and installation of 2 permanent perched groundwater monitoring wells are provided below.

Task 3.2 – Grab Groundwater Sampling Using Hydropunch

- Soil borings will be drilled at the locations shown on **Figures 2a** and **2b** utilizing the combination of hollow stem auger drilling method and hydropunch groundwater sampling.
- Soil borings will be drilled to about 28 to 30 feet bgs, followed by advancing a hydropunch to 31 feet bgs or until groundwater is encountered. Grab samples of groundwater from two locations will be collected using the hydropunch.
- All drilling and sampling equipment/tools will be decontaminated before and after drilling each soil boring and between sampling groundwater.
- An experienced engineer or geologist under direct supervision of California-licensed Professional Geologist or Professional Engineer will log the soil borings per ASTM D 2487 standards.
- Groundwater samples will be collected in laboratory prepared containers, and will be labeled, preserved, packaged and delivered under Chain-of-Custody to the laboratory.
- All Health and Safety procedures will be followed by field personnel, and the work area and breathing zone will be routinely monitored for VOCs using a Photo Ionization Detector (PID) equivalent to MiniRAE 3000.
- All excess drill cuttings, decontamination liquids and used PPE will be placed in Department of Transportation (DOT) 55-gal drums, and drums will be sealed and labelled for proper disposal pending the receipt and evaluation of analytical results. Waste drums will be removed from the site and properly disposed within 90 days of waste generation.
- After sampling is completed each hydropunch boring will be backfilled up to depth of 5 ft bgs with 5% Bentonite/Portland cement grout and above 5 ft depth the borings will be backfilled with local native soil per the requirement of the San Bernardino County Department of Health permit.
- Boring locations will be measured from the Alpha East LTU for presentation on a figure/map of the LTU.

<u>Perched Groundwater Monitoring Well Installation</u>

- As required by the RWB, we will install two permanent groundwater monitoring wells, one downgradient of Alpha East LTU, and one upgradient of the Alpha East LTU. The proposed locations of the monitoring wells MW-LTU-A1 and MWLTU-A2 are shown in **Figure 2b**. Per our virtual meeting on September 24, 2025, HAI will discuss the analytical results for the grab samples with the RWB and CEC to adjust the location of the downgradient well, as necessary.
- The design of the new perched monitoring wells will be similar to the design of the existing monitoring wells shown in **Figure 3**.

- HAI's State of California Certified Engineering Geologist (CEG) will log the soil borings according to the Unified Soil Classification System (USCS).
- The soil cuttings generated from the borings will be drummed and all soil borings will be backfilled with non-shrink cement bentonite grout. The sampler and augers will be decontaminated between borings.
- Soil samples will be obtained using clean rings/tubes and taken to our Geotechnical Laboratory for grain size, and plasticity determinations.
- After completion of groundwater monitoring wells installation, the two wells will be developed to remove fine sediments, and any residuals from the borehole and filter pack, allowing groundwater to flow freely into the well screen.
- Following well development, groundwater samples will be collected in laboratory prepared containers, labeled and sent to Eurofins Calscience laboratory in Tustin, a State-certified laboratory, for analysis.

Task 3.3 - Laboratory Testing

- The collected groundwater samples will be analyzed using the appropriate EPA Test Methods for the following compounds:
  - EPA Test Method 8015B modified for detection/identification of Biphenyl (CAS N0. 92-52-4), and Diphenyl Oxide (CAS No. 101-84-8),
  - EPA Test Method 8260B for VOCs,
- Laboratory to provide results in report and excel spreadsheet format (to facilitate screening of results) and full Laboratory Quality Control results.

Task 3.4 – Evaluation of Results

- The laboratory results and comparisons will be summarized in "screening" tables for ease of review.
- Compare the test results to the State and Federal criteria and to the established allowable levels by RWQCB, CEC and DTSC. The detected concentrations of analytes in the groundwater samples will be discussed with RWQCB and CEC.

Task 3.5 - Prepare Report

- HAI will prepare a report summarizing the results of the groundwater quality investigation. The report will include a summary of work performed including introduction and purpose of the investigation, a brief summary of the site's background, descriptions of field activities, maps showing the site location and locations of new monitoring wells and hydropunch sampling, tabulated analytical results, and our evaluation of the results and recommendations for additional work, if warranted. The report will also include copies of boring logs and well construction design, chain of custody records, copies of laboratory reports, Health and Safety Plan, and the SOP. The report will be prepared and signed by HAI California Licensed PE with extensive experience in environmental investigations/ remediation.

4.0 CONTAMINATED SOIL EXCAVATION, REMOVAL, AND ALPHA EAST LTU CLOSURE

Per the September 24, 2025, virtual meeting with CEC and RWB, MS will either restore the Alpha East LTU or close it provided there is sufficient remaining LTU space for contaminated soil storage. If closure option is selected by MS, then MS will provide a plan to the RWB and CEC stating the protocol for proper management of an emergency high volume spill/leak.

Following the abovementioned meeting MS requested HAI to search for an environmental remediation contractor to handle removal of the contaminated soil, liner, and sample ports from Alpha East LTU and backfill the excavation with clean soil. MS indicated that they would proceed with Alpha East LTU closure.

In addition, during the virtual meeting it was decided that pre-soil removal sampling would not be required, and that the best option would be to excavate the contaminated soils from Alpha East LTU for either onsite use or proper offsite disposal based on analytical results for the samples.

Following excavation of the contaminated soils and the LTU liner, stockpiling the contaminated soil, confirmatory sampling and testing at bottom and walls of excavation for non-detects, composite sampling and testing of stockpile soil samples, and transport of contaminated soil stockpiles to appropriate landfill, import clean soil, backfill and compact, and abandon the Alpha East LTU. The soil samples will be analyzed for Biphenyl, Diphenyl Oxide, and Volatile Organic Compounds (VOCs) using EPA method 8260B. During excavation of the contaminated soil and LTU liner, HAI will document the as-built details of the liner system to complement information obtained from the project documents on the liner system construction.

For contaminated soil management scope, HAI proposes to conduct the following tasks:

Task 4.1 –Pre-field Activities

Health and Safety Plan - Health and safety procedures to be followed during the field work are included in **Appendix B**. Level D personal protective equipment (PPE) will be worn by the field crew during soil sampling activities. PID will be used to monitor soil, work area and breathing zone for VOCs.

Excavation/Backfilling Contractor Selection - HAI will select a qualified excavation/backfilling earthwork contractor to handle soil excavation, transportation, and backfilling needs.

Staking Excavation Area - HAI will coordinate with the selected Contractor and Client to stake/mark the excavation area and notify Underground Service Alert (USA) to obtain underground utility clearance.

Underground Utility Clearance – After marking/staking the excavation area, HAI/Contractor will notify Underground Service Alert (USA) at least 72 hours prior to mobilization. For additional safety reasons and to minimize potential liabilities to MS and HAI, HAI recommends the use of geophysical methods (e.g. ground penetrating radar [GPR]) to help locate utilities.

HAI will subcontract a private utility locator for completing a geophysical survey of the site so

that public or private underground utilities at the proposed excavation area can be identified prior to beginning fieldwork.

Task 4.2 – Soil Excavation and Sampling

- A remediation contractor will be mobilized to remove the contaminated soil from Alpha East LTU.
- MS will secure all permits associated with the impacted soil removal project. Remediation contractor will secure a Cal-OSHA permit.
- The excavation contractor will prepare and implement their own Site-Specific Health and Safety Plan for review by HAI and MS prior to the start of work.
- The area to be excavated has been estimated to be approximately 80 feet long by 40 feet wide. The soil within LTU will be excavated to about 2.5 below the bottom of the LTU to remove the contaminated soil beneath the LTU. The excavated soil will be stockpiled next to the excavation area (i.e., within 100 feet).
- During the excavation, HAI will use a PID to screen soil removed for the VOCs. The excavated soils will be stockpiled on and covered with visqueen at the end of each day. The following PID readings will be used to separate the stockpile areas as follows:
    - Stockpile 1 (PID reading 0-100 ppm),
    - Stockpile 2 (PID reading 100-1000 ppm),
    - Stockpile 3 (PID reading >1000 ppm).
- Upon completion of the excavation activities, each stockpile will be divided into 4 sections, and 3 samples will be collected from each section at equal depth interval from the top to the bottom of the stockpile. The 3 samples from each section will be composed at the laboratory and will be analyzed for Biphenyl (CAS N0. 92-52-4), and Diphenyl Oxide (CAS No. 101-84-8) using EPA Test Method 8015B modified, and VOCs using EPA Test Method 8260B, for a total of 4 samples from each stockpile.
- When PID readings are within 0-100 ppm for the soils excavated from the bottom of the LTU excavation, HAI will collect up to 10 confirmatory samples in laboratory provided containers from the base and the walls of the excavation. Soil samples will be labeled, preserved, packaged and delivered under Chain-of-Custody to the laboratory for laboratory analysis (expedited turnaround) to inform the contractor of the results immediately and avoid demobilization or significant downtime. The excavation activities will terminate when laboratory results are non-detect for Diphenyl, Diphenyl Oxide and VOCs in the confirmatory samples.
- Two existing sample ports will be removed and disposed of as trash off site. No sample ports will be reinstalled.
- MS will supply water for dust control and backfill. The remediation contractor will supply a water truck to transport water to the excavation area.
- MS will review and use the laboratory results for each stockpile to determine the disposal requirement, based on the detected concentrations of HTF in the samples. The stockpiles with the laboratory reported results between 0-100 mg/kg for the HTF compounds will

be used onsite. The stockpiles with the laboratory reported results between 100-1000 mg/kg, and >1000 mg/kg for the HTF compounds will be evaluated for proper disposal at offsite disposal facilities with the required manifest signed by MS.

- The excavated area will be backfilled with clean import soil and compacted.
- The clean soil has been estimated to be imported from Vulcan Materials in Barstow, California. The remediation contractor will make proper arrangements prior to mobilization for HAI to conduct soil testing, acceptance, and to conduct Proctor density testing.
- The remediation contractor will provide box shoring to support the retaining wall to a depth of two feet below the bottom elevation of the footing. No undermining of the footing will be conducted.
- HAI will provide soil compaction testing and reporting.

Task 4.3 - Laboratory Testing

- Soil samples will be tested by Eurofins Calscience of Tustin, California, a State Certified chemical analysis laboratory, as follows:
    - EPA Test Method 8015B modified for detection/identification of Biphenyl (CAS N0. 92-52-4), and Diphenyl Oxide (CAS No. 101-84-8),
    - EPA Test Method 8260B for VOCs,
- Laboratory will provide results in report and excel spreadsheet format (to facilitate screening of results) and full Laboratory Quality Control results.

Task 4.4 - Prepare Report

HAI will prepare a report summarizing the field activities during excavation, sampling of the stockpiles, supported by photos, drawings of the final excavation and stockpiles' sizes, stockpile sample locations and depths, and field notes. All data collected during the excavation phase of the investigation will be provided in tables, and a summary of the data evaluation and fate of the excavated soils based on the analytical results will be provided in the report. Copies of all chain-of-custody and laboratory reports will be included in the report. Report. will be prepared and signed by HAI California Licensed PE with extensive experience in environmental investigations/remediation.

Prepared by Hushmand Associates, Inc.

Ben Hushmand, President, CA PE 44777 Date

Included:

FIGURES

Figure 1 – Site Location
Figure 2a - Alpha East LTU Soil Boring and Groundwater Grab Sample Locations with HTF Test Results and Proposed Hydropunch Groundwater Sample Locations
Figure 2b - Proposed Locations of Hydropunch Groundwater Sample and Additional Monitoring Wells
Figure 3 - Proposed Well Design

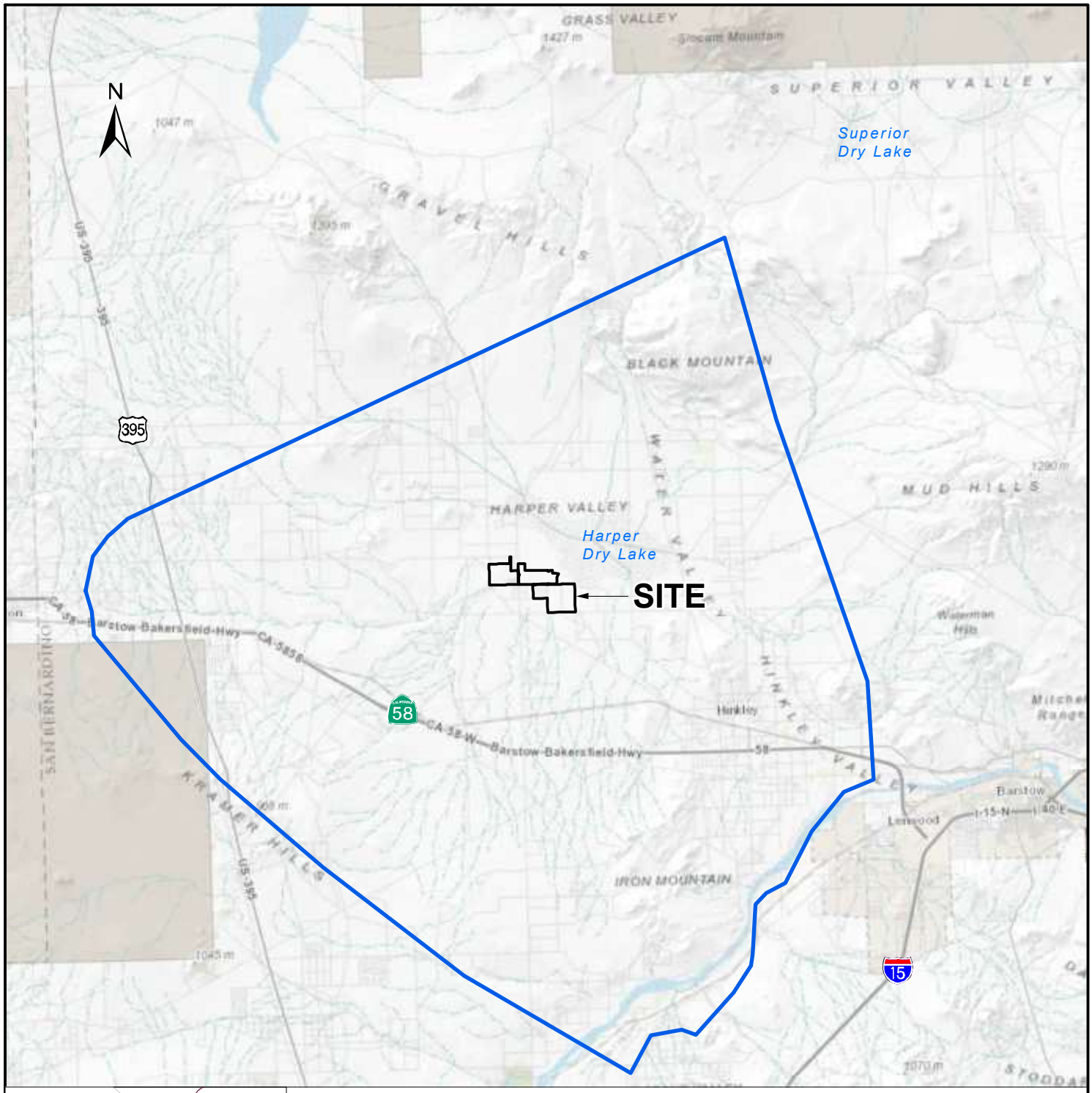
APPENDICES

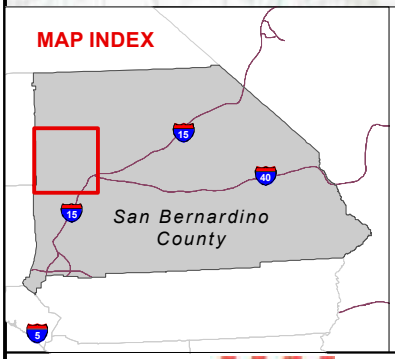
Appendix A - Standard Operating Procedures for Field Operations
Appendix B - Site-Specific Health and Safety Plan for Mojave Solar Project Alpha East Land Treatment Unit

ATTACHMENTS

Attachment A - Copy of NOV Letter
Attachment B - Copies of the Tables containing the Analytical Results For Soil, and Grab Groundwater Samples (2024 Investigation Results)
Attachment C - Copy of Batch Canister Certification
Attachment D - Alpha LTU Drawings
Attachment E - Table 29b from 2024 Annual DMP Report

FIGURES





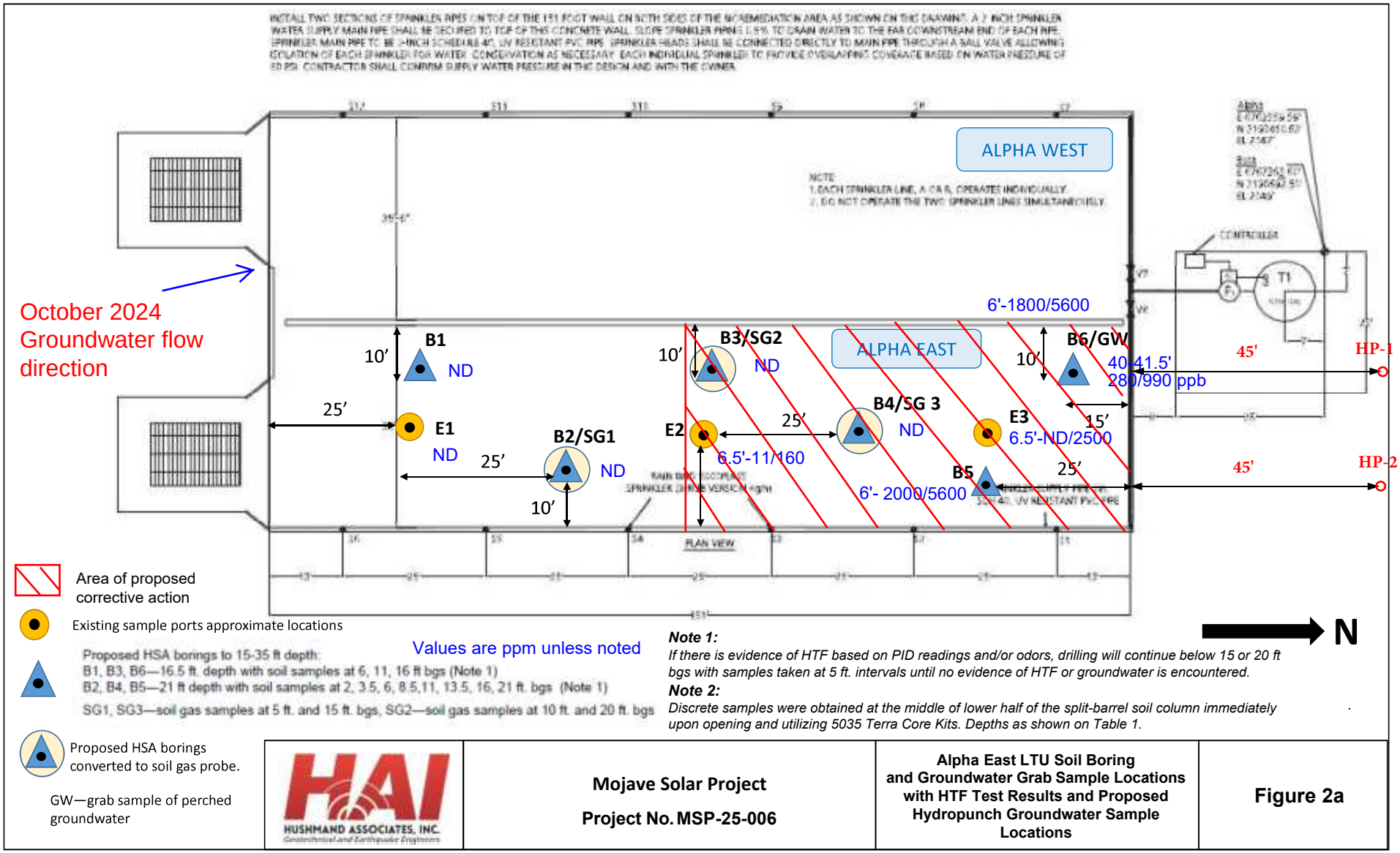
Sources: Esri, DeLorme, NAVTEQ, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, and the GIS User Community

SCALE IN MILES

0 5 10

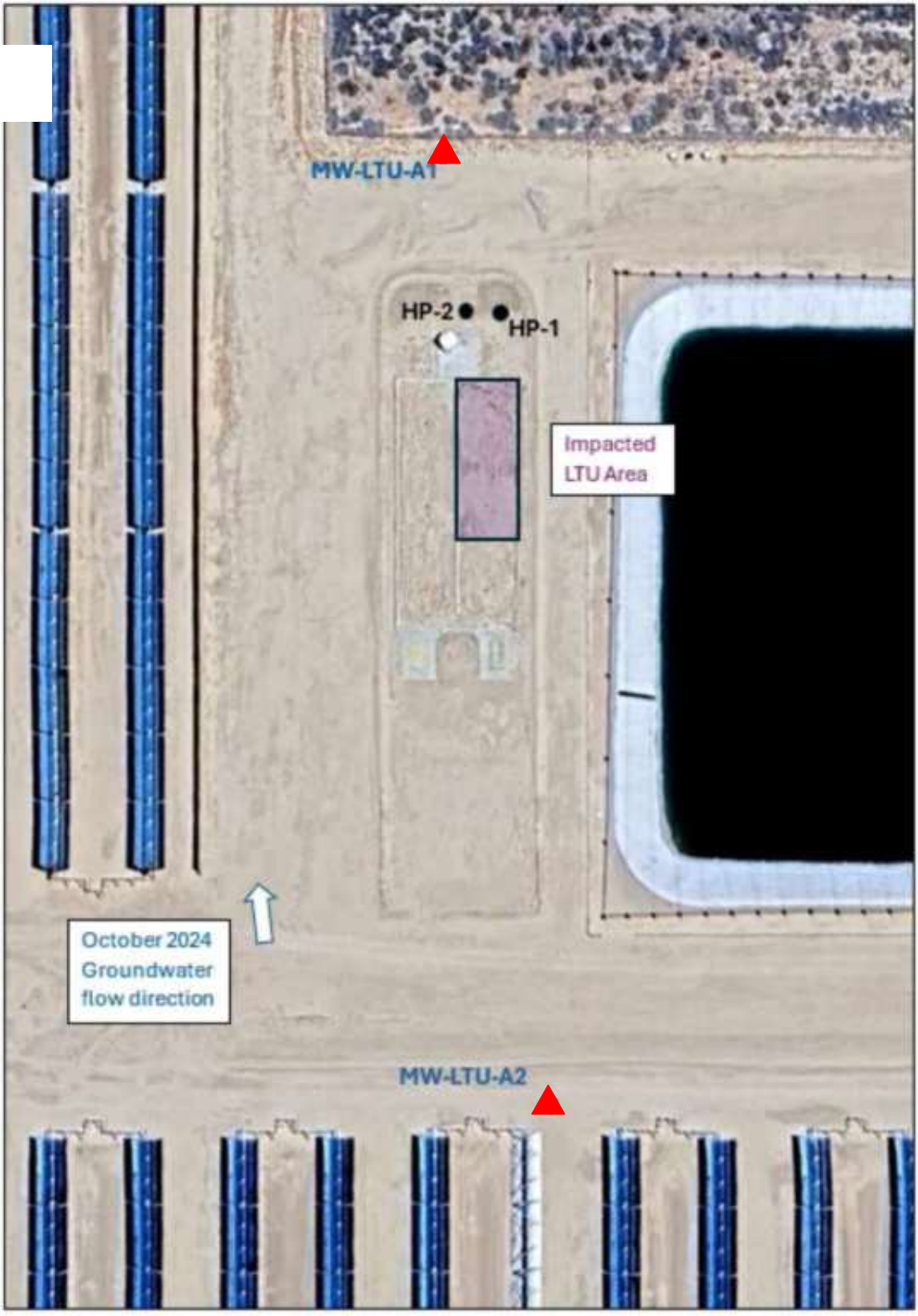
NOTE: DIRECTIONS, DIMENSIONS AND LOCATIONS ARE APPROXIMATE

HAI		**SITE LOCATION**	FIGURE
PROJECT NO.	DATE	MOJAVE SOLAR PROJECT SAN BERNARDINO COUNTY, CALIFORNIA	**1**
MSP-25-006	10/07		



HUSHMAND ASSOCIATES, INC.	**Mojave Solar Project** **Project No. MSP-25-006**	**Alpha East LTU Soil Boring and Groundwater Grab Sample Locations with HTF Test Results and Proposed Hydropunch Groundwater Sample Locations**	**Figure 2a**

Proposed HSA borings to 15-35 ft depth:
B1, B3, B6—16.5 ft. depth with soil samples at 6, 11, 16 ft bgs (Note 1)
B2, B4, B5—21 ft depth with soil samples at 2, 3.5, 6, 8.5,11, 13.5, 16, 21 ft. bgs (Note 1)
SG1, SG3—soil gas samples at 5 ft. and 15 ft. bgs, SG2—soil gas samples at 10 ft. and 20 ft. bgs

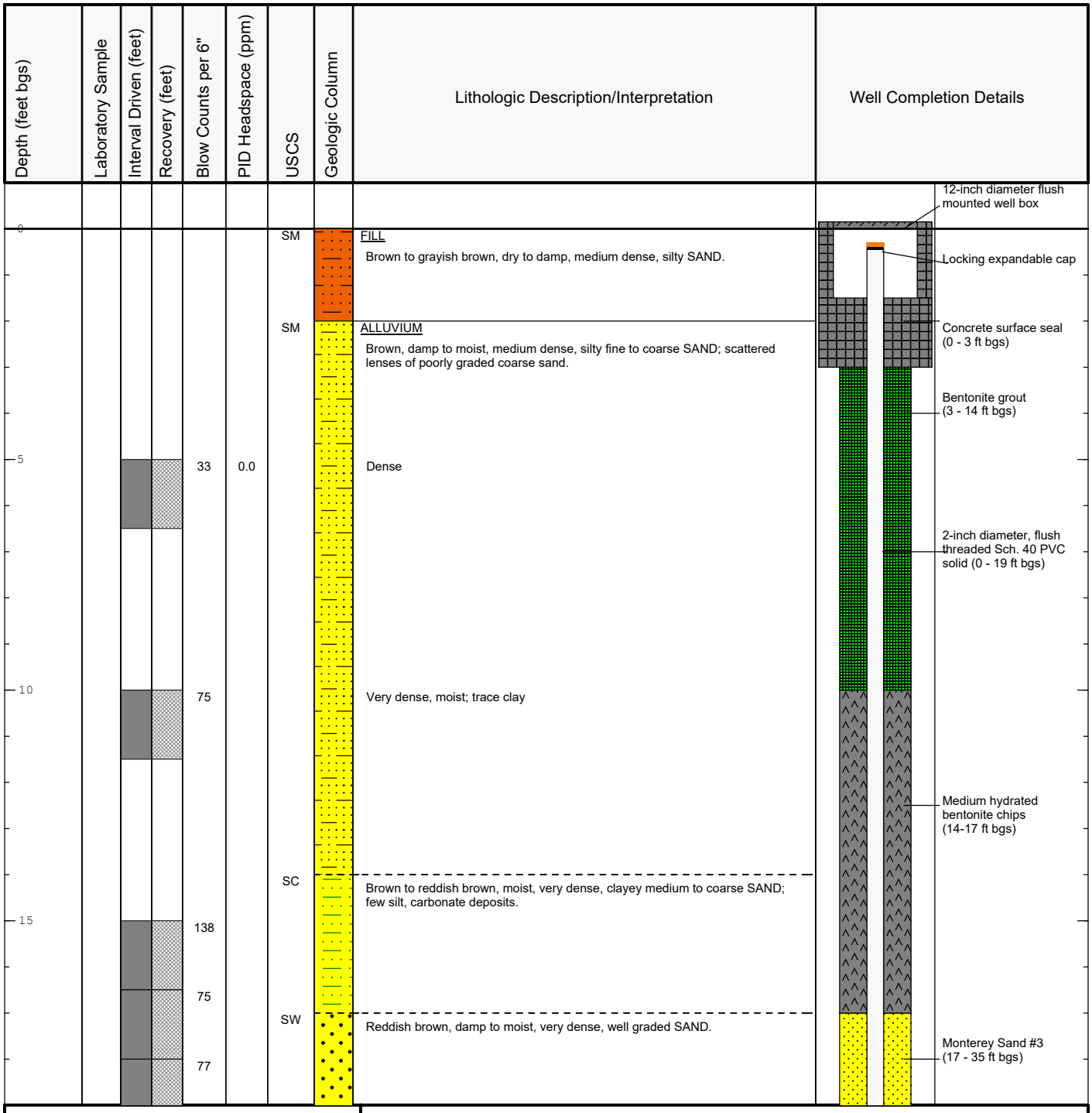


▲ **Proposed location of additional monitoring well**

● **Proposed hydro punch locations**

HUSHMAND ASSOCIATES, INC. Geotechnical and Earthquake Engineers	**MOJAVE SOLAR PROJECT** **SAN BERNARDINO COUNTY, CALIFORNIA** Project No. MSP-25-006	**Proposed Locations of Hydropunch Groundwater Sample and Additional Monitoring Wells**	**Figure 2b**

Date Start/Finish: **Drilling Company:** **Driller's Name:** **Drilling Method:** Hollow Stem Auger **Bit Size:** 8.5-inch **Auger Size:** 8-inch **Rig Type:** CME-85 **Sampling Method:** 1.5" OD SPT, 2.5" OD core	**Northing:** **Easting:** **Elevation:** **Total Depth:** 35 ft bgs **Logged By:** **Sampled By** **Reviewed By:**	**Boring ID:** **Client:** **Location:**



bgs - below ground surface
ft - feet
lbs - pounds
msl - mean sea level
NM - not measured
OD - outer diameter
PID - photoionization detector
PVC - polyviny chloride
P.G. - Professional Geologist
ppm - parts per million
Sch. - schedule

Figure 3 - Proposed Monitoring Well Design

Date Start/Finish:		**Northing:**	**Boring ID:**
Drilling Company:		**Easting:**	
Driller's Name:		**Elevation:**	**Client:**
Drilling Method:	Hollow Stem Auger	**Total Depth:** 35 ft bgs	
Bit Size:	8.5-inch		**Location:**
Auger Size:	8-inch	**Logged By:**	
Rig Type:	CME-85	**Sampled By**	
Sampling Method:	1.5" OD SPT, 2.5" OD core	**Reviewed By:**	

Depth (feet bgs)	Laboratory Sample	Interval Driven (feet)	Recovery (feet)	Blow Counts per 6"	PID Headspace (ppm)	USCS	Geologic Column	Lithologic Description/Interpretation	Well Completion Details
20				20/6"		SM		ALLUVIUM (continued) Reddish brown, moist, very dense, silty coarse SAND; scattered carbonate deposits and evaporite minerals.	
				105					
				90				Fine to medium sand	
				83				Trace coarse sand	2-inch diameter flush threaded 0.020-inch slot Sch. 40 PVC well screen (19 -34 ft bgs)
25								Trace gravel, magnesium oxide staining	
								Wet	
								Saturated	
								Scattered lenses of coarse sand	
30									Monterey Sand #3 (17 - 35 ft bgs)
						CL		Brown, saturated, very stiff to hard, silty CLAY; manganese oxide staining, polished parting surfaces.	2-inch diameter flush threaded SCH. 40 PVC end cap
35								Terminated boring at 35 ft bgs. Groundwater encountered at approximately 27.0 ft bgs during drilling and measured at 27.05 ft bgs two days after completion of well installation. Groundwater may rise or fall due to seasonal variations in precipitation and/or several other factors.	

bgs - below ground surface
ft - feet
lbs - pounds
msl - mean sea level
NM - not measured
OD - outer diameter
PID - photoionization detector
PVC - polyviny chloride
P.G. - Professional Geologist
ppm - parts per million
Sch. - schedule

Figure 3 - Proposed Monitoring Well Design
(continued)

APPENDICES

APPENDIX A

STANDARD OPERATING PROCEDURES FOR FIELD OPERATIONS

TABLE OF CONTENTS

A.1 SOP 1: HOLLOW-STEM AUGER DRILLING/SOIL SAMPLING

A.1.1 REQUIRED EQUIPMENT

- Sampling and Analysis Plan (SAP)
- Site logbook or blank Daily Field Reports and boring logs
- Indelible black-ink pens and markers
- Camera
- Hollow-stem auger drill rig
- Split-barrel samplers
- Photoionization detector (PID)
- Plastic sheeting
- 55-gallon drums
- Insulated cooler(s), chain-of-custody seals, Ziploc bags
- Sample labels and appropriate documentation
- Assorted geology supplies (e.g., hand lens, grain size card, scales, etc., as needed)
- Decontamination equipment

A.1.2 TYPICAL PROCEDURES

A.1.2.1 Preparation

1. Conduct site activity/health and safety briefing.
2. Confirm utility clearance has been completed and site is clear.
3. Calibrate field instrumentation.
4. Record necessary data in field logbook or on Daily Field Report.
5. Obtain photograph(s) of site before drilling.
6. Place plastic sheeting and drums at drilling location to collect cuttings.
7. Move equipment and supplies to drilling location.
8. Set up decontamination and sampling stations.

A.1.2.2 Construction

1. Obtain surface soil samples, if required.
2. Drill to first sampling depth, as described in the SAP.
3. Place three (3) decontaminated stainless sleeves in the spilt-barrel sampler. (Only at selected locations for obtaining samples for moisture/density as described in the SAP).
4. Place decontaminated split-barrel sampler on center rods.
5. Drive split-barrel sampler. Retrieve sampler.
6. Field screen the sample in accordance with SOP 2 Headspace Field Screening.
7. Collect soil samples for VOC testing using the Terra Core Kit and preservative.
8. Using a stainless-steel scoop fill a 4 oz clean glass jar with soil from the sampler for the remaining testing.
9. Describe soil in accordance with ASTM D2488 on the boring log form.
10. Prepare samples for preservation and transport per SOP 4 Sample Packing and Shipping.
11. Decontaminate the split-barrel sampler and scoop by scraping out soil then washing equipment with tap water/detergent (Alconox or equivalent) solution and rinse equipment twice with tap water.
12. Continue drilling at next sample location. Clean augers must be used at each new location.
13. Collect samples as outlined above.
14. During drilling routinely check auger soil cuttings with PID or FID. If readings exceed 50 ppm stop drilling activities, move personnel about 20 ft. up wind from the drill rig and wait for VOCs to clear. Recheck with PID before returning to drilling/sampling. Also, either have the contractor place the soil in sealed 55-gal drums or cover the stockpile with plastic sheeting secured by clean soil or sandbags.

A.2 SOP 2: HEADSPACE FIELD SCREENING

A.2.1 REQUIRED EQUIPMENT

- Sampling and Analysis Plan (SAP)
- Indelible black-ink pens and markers
- Site logbook or blank Daily Field Reports and boring logs.
- Camera
- Ziploc bags
- Photoionization detector (PID)

A.2.2 TYPICAL PROCEDURE

1. Calibrate PID in accordance with the manufacturer's specifications.
2. Label Ziploc bag with the sample number. Best done in advance of sampling to expedite the process.
3. Use stainless steel spoon to scoop the soil from the split-barrel and place soil immediately in Ziploc bag until bag is approximately one-half full. Seal and shake Ziploc bag to homogenize sample.
4. Let the Ziploc sit for 5 minutes +/- then place PID wand into Ziploc bag, being careful not to contact soil with PID probe.
5. Record highest sustained reading in field logbook or on soil boring log.

A.3 SOP 3: FIELD INSTRUMENT CALIBRATIONS

A.3.1 CALIBRATION FREQUENCY FOR FIELD EQUIPMENT

Field equipment used for on-site measurements will be calibrated in accordance with the manufacturer's specification before and after field use each day, or at a frequency recommended by the equipment manufacturer or industry practice. If any screening or test device requiring calibration cannot immediately be removed from service, the Project Manager may extend the calibration cycle, providing a review of the equipment's history warrants the issuance of an extension. No equipment will be extended more than twice per calibration cycle, nor will the extension exceed one-half the prescribed calibration cycle.

All calibration information will be recorded in the site logbook or Daily Report. This includes the instrument's make, model, serial number, condition, and all adjustments made during calibration of the instrument.

A.4 SOP 4: SAMPLE PACKING AND SHIPPING

A.4.1 REQUIRED EQUIPMENT

1. Sampling and Analysis Plan (SAP)
2. Indelible black-ink pens
3. Site logbook/ Daily Field Report blanks
4. Ziploc bags
5. Coolers
6. Blue Ice (or equivalent)
7. Strapping tape or duct tape
8. Vermiculite (or equivalent)
9. Sample Logs
10. Sample labels
11. Chain-of-custody forms

A.4.2 TYPICAL PROCEDURES

Note: Before packing, all samples will be individually labeled and noted in the site logbook or Daily Field Report. Labels will be completed with all required information. The samples will be assigned individual numbers. At a minimum the label will have Project Name/No., date, time, sample number, designation if duplicate, and initials of field personnel taking the sample. The labels should be prepared in advance to expedite getting the samples into the cooler. The sample numbers will be used to complete the chain-of-custody forms.

Samples to be hand-delivered to the laboratory:

1. Attach sampling label and custody seals (if necessary) on each sample.
2. Place each sample in a Ziploc bag and align the label so it can be easily read. Seal the bag.
3. Place individual samples into the cooler lined with a larger heavy duty plastic garbage bag so that each container is safely secured.
4. Include three or more (sufficient) Blue Ice packs (or equivalent) to maintain a low temperature environment (approximately 4°C or less). These should be added the night prior to sampling or early on the day of sampling. Blue Ice packs should not be in contact with the sample containers.
5. Prepare a chain-of-custody form for the containers and seal in a Ziploc bag. Place the chain-of-custody form in the cooler. Always transport the cooler with its accompanying chain-of-custody form together.

Samples to be shipped to the Laboratory:

1. Place each sample in a Ziploc bag and align the label so it can be easily read. Seal the bag.
2. Place individual samples into the cooler so that each container has some clearance on all sides.
3. Fill void space with vermiculite or equivalent low-density packing material.
4. Cover the head space inside the cooler with frozen Blue Ice packs (or equivalent).
5. Place the chain-of-custody form in a sealed Ziploc bag and place it in the cooler.
6. Close and latch the cooler. Wrap the cooler and lid with at least two turns of strapping or duct tape. Affix signed custody seals over the edge of the lid and the top of the cooler body at front and rear.
7. Label coolers with up arrows and information to comply with Department of Transportation (DOT) requirements.
8. The HAI geologist will notify the laboratory approximately when and how many samples will arrive. The samples must be kept under refrigeration (or packed with Blue Ice or equivalent) between sampling and analysis processing. The sample containers will be checked on arrival at the laboratory for damage.

A.5 SOP 5: SAMPLING EQUIPMENT DECONTAMINATION

A.5.1 REQUIRED EQUIPMENT

1. Tap water
2. Deionized water
3. Laboratory-grade detergent (i.e., Alconox or equivalent)
4. 5-gallon buckets, or other appropriate container
5. Scrub brushes
6. Plastic garbage can
7. Methanol
8. Dilute nitric acid (if metals analysis will be conducted)
9. Hexane (if pesticide or PCB analysis will be conducted)
10. Plastic sheeting
11. Sprayers (garden or hand)

A.5.2 TYPICAL PROCEDURE

A.5.2.1 Preparation

1. Set up decontamination area on plastic sheeting.
2. Set up "clean" area upwind of decontamination area for air drying of equipment.
3. Fill one 5-gallon "wash" bucket with detergent and tap water.
4. Fill spray bottles with tap water, deionized water, and applicable solvents.

A.5.2.2 Decontamination of Sampling Equipment

1. Remove gross contamination from sampling equipment.
2. Wash equipment with tap water/detergent solution.
3. Rinse equipment twice with tap water.
4. Rinse equipment with deionized water (sprayer).
5. Air dry.
6. Place disposable items (sampling gloves, paper towels, etc.) in garbage bag.

A.6 SOP 6: INVESTIGATION-DERIVED WASTE HANDLING

A.6.1 REQUIRED EQUIPMENT

- 55-gallon drums
- Paint markers
- Tools
- Ziploc bag
- Drum labels

A.6.2 SOLID WASTE HANDLING

1. Solid wastes needing to be containerized will be placed in 55-gallon drums or other approved containers. Solid residues known to be from a contaminated area should not be combined with other residues.
2. After proper decontamination, protective clothing and used disposable sampling equipment should be drummed together and separated from other waste types. Protective clothing and disposable sampling equipment should be collected daily and placed in a dedicated drum for this waste type. Personal protective equipment that does not come in contact with contaminated media can be disposed of (except footwear) along with domestic waste. However, disposable footwear should always be containerized in drums for proper disposal.
3. All filled or partially filled drums must be properly closed, sealed, labeled, and staged before demobilization. If storage is anticipated in excess of 2 weeks, the drums should be covered with a wind/rain resistant cover, such as a plastic or polyethylene tarp. **The waste must be removed within 90 days of waste generation.**

APPENDIX B

APPENDIX B
SITE-SPECIFIC HEALTH AND SAFETY PLAN
MOJAVE SOLAR PROJECT
ALPHA EAST LAND TREATMENT UNIT

In an Emergency Call Mojave Solar Control Room (760) 308-0400; If Not Available Call Mojave Compliance Manager (760) 308-0385; If Not Available Dial 911

Submission to the Agencies

Prepared for

Atlantica Sustainable Infrastructure
Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
(760) 308-0418

Prepared by

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April 2024

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LIST OF ATTACHMENTS

1.0 INTRODUCTION

1.1 GENERAL

This Site-specific Health & Safety Plan (HASP) has been prepared by Hushmand Associates, Inc. (HAI) for personnel performing project-specific activities associated with the Mojave Solar Alpha East Land Treatment Unit, referred to herein as the "Project". The Project is located the Mojave Solar facilities 42134 Harper Lake Road, Hinckley, California.

This plan addresses specific health and safety requirements for field personnel during the field investigation activities. The work to be completed is described in the Sampling and Analysis Plan to which this HASP is appended. All field staff must understand and adhere to the requirements of this HASP. Acknowledgement that personnel are aware of this plan and its contents will be documented by signing the HASP Acknowledgement Form located in Attachment B-1. This HASP has been prepared in accordance with the California Code of Regulations (CCR), Title 8, Section 5192, and the Occupational Safety and Health Administration (OSHA) Standards, Code of Federal Regulations (CFR) Section 1910.120.

1.2 SCOPE OF EXPLORATIONS

Analytical results on samples from existing sample ports at the Alpha East LTU have indicated detected concentrations of Biphenyl (CAS N0. 92-52-4), and Diphenyl Ether (CAS No. 101-84-8). Due to these detections, a Corrective Action Plan (CAP) is required to submit to the agencies. To develop the CAP additional information is needed on the nature and extent of the contamination. To accomplish this, borings are to be completed to obtain soil and soil gas samples from the subsurface at the Alpha East LTU.

2.0 ORGANIZATION AND RESPONSIBILITIES

HAI expects its employees and subcontractor employees to follow the policies and procedures set forth in this document and in the HAI company health and safety program. Employees at all levels of the organization are covered by this requirement and shall not disregard and/or alter policies or procedures herein. In certain cases, deviations to a policy or procedure may be appropriate, but any changes must be justifiable and documented. Changes to this document and HAI health and safety program will only be made with prior approval of the Site Safety Officer (SSO).

The health and safety goal on this project, as on all HAI projects, is to experience **zero injuries** and to remain in full compliance with applicable federal, state, and local health and safety requirements. Accountability for employee health and safety on this project is defined in the following sections. The following identifies the responsible personnel for Health and Safety:

Site Safety Officer **Barzin Sharifi, MS, EIT**

- Responsible for all onsite Health and Safety Plan implementation;
- Establishes restricted work zone and decontamination zone at each boring site and delineates each with cones, caution tape and signs;
- Conducts and documents daily onsite Health and Safety briefings;
- Performs work area and breathing zone monitoring with organic vapor analyzer (PID or FID);

- Supervises actions taken onsite related to HASP issues (e.g., exceedance of VOC trigger level and actions taken) and prepares field memorandum to report the issue and actions taken; and
- Reports immediately to CIH and Project Manager any HASP related issue, actions taken and consults with CIH if further action may be needed.

Project Manager/Assistant Manager **Ben Hushmand, PhD, PE/ Santosh Bhattarai, MS, PE**

- Prepares scope of work and supervises implementation;
- Consults with HSO and SSO on any activity or change of activity or location with potential impacts to HASP and/or HASP implementation;
- Communicates directly to the client regarding field work progress and Health and Safety issues;
- Reviews all QC and implements project QA including review of laboratory QA/QC; and
- Supervises and reviews all data screening, data validation and report preparation.

More detail is provided in the next subsections. All personnel conducting work activities on site must have 40-hr and 8-hr refresher training complaint with Cal-OSHA requirements for hazardous waste site work and be under a medical surveillance program.

2.1 PROJECT MANAGER

The Project Manager (PM) has the ultimate responsibility to ensure that the project conforms to contract specifications and that all project activities are conducted safely. The PM can order field activities to be suspended if he/she feels that the project may be jeopardized by not doing so. The PM has the responsibility of coordinating the work with Mojave Solar and regulatory agencies.

2.2 SITE SAFETY OFFICER/FIELD REPRESENTATIVE

The Site Safety Officer (SSO), who may also be HAI field representative on site, is responsible for implementing the HASP during the project field tasks. Items that may be implemented for this project include verifying health and safety qualifications of site personnel; obtaining and maintaining documentation of training, monitoring, and site safety notes; enforcing the requirements of the HASP; and conducting site safety meetings. The SSO can order field activities be suspended due to health and safety deficiencies or concerns.

2.3 SUBCONTRACTORS

Only trained, experienced drilling and backhoe subcontractors, and associated field staff will be used for this project. All personnel on-site will be required to review and understand this HASP. Daily safety meetings will be held in which health and safety issues, such as site access and physical hazards, will be discussed. Subcontractors shall abide by the HASP and directions from the SSO on health and safety matters.

3.0 HAZARD EVALUATION ANALYSIS

3.1 GENERAL

Because this is a geotechnical/environmental project, the primary hazards associated with the fieldwork are physical and chemical hazards. There is some potential for exposure to soils contaminated with

Biphenyl (CAS N0. 92-52-4), and Diphenyl Ether (CAS No. 101-84-8), chemicals in Therminol VP1 Heat Transfer Fluid used for site operations and treated by bioremediation in the LTU. The Anticipated physical and chemical hazards associated with this project are summarized in Table B-1, Hazard Evaluation Analysis and discussed further in this HASP. Many hazards are common to each task to be conducted during the project and are addressed in Standard Operating Procedures section of this document (HASP).

Table B-1. Hazard Evaluation Analysis

Description of Task	Potential Hazard	Prevention
Drilling	1. Crushed feet from equipment	▪ Use steel-toed boots. ▪ Stand in areas outside of auger placement.
	2. Head injury	▪ Wear hard hat. ▪ Watch for overhead objects including augers and swing equipment. ▪ Stay out of fall zone.
	3. Buried utilities	▪ Review Mojave Solar utility maps. ▪ Verify locations of markings. ▪ Utilize USA Alert services where applicable. ▪ Hand auger upper 5 ft at each boring location prior to HSA drilling. ▪ Note pavement cuts, drains and location of surface utilities.
	4. Noise	▪ Noise levels of the HAS drill rig are low and typically do not create a noise hazard. If necessary, the drilling crew and geologist will wear hearing protection.
	5. Explosion of Hydrocarbon Vapors	▪ Monitor VOC level at boring lip and stop drilling if trigger is exceeded. ▪ No smoking allowed in work areas.
	6. Vapor inhalation	▪ Monitor breathing space with PID, if trigger level is exceeded stop drilling until clears or don full face organic vapor respirator.
	7. Potential public exposure to chemicals	▪ Restrict access to work areas. ▪ Perform monitoring of VOCs in the work area and breathing zone and take designated mitigation actions.

Description of Task	Potential Hazard	Prevention
	8. Worker exposure to Biphenyl (CAS N0. 92-52-4), and Diphenyl Ether (CAS No. 101-84-8) and heavy metals through digestion and/or skin contact	▪ Use protective gloves and clothing, including Nitrile-based gloves when handling samples. ▪ No eating or smoking in designated work areas.
Sampling –Soil	1. Finger pinch 2. Vapor inhalation, skin contact, splash in eye, digestion	▪ Use protective gloves and clothing, including Nitrile-based gloves, when handling samples. ▪ Monitor breathing space with PID, if trigger level is exceeded stop drilling until clears or don full face organic vapor respirator. ▪ Wear eye protection googles. ▪ No eating or smoking in designated work areas.
Surface Logging	1. Vapor inhalation 2. Dermatitis & skin irritation	▪ Monitor breathing space with PID. ▪ Use protective gloves and clothing, including Nitrile-based, when handling samples.
Lifting	1. Back strain	▪ Use proper lifting techniques. ▪ Stretch previous to starting work shift. ▪ Wear back brace to promote proper posture. ▪ Lift with legs. ▪ Ask for help if the load is beyond capabilities or heavier than 50 lbs.
Work Zone Movements	1. Vehicle traffic	▪ Observe traffic patterns prior to work. Set up cones to create safe zone around equipment.* ▪ Walk on sidewalk side of equipment, if possible.
	2. Slip, Trip, Fall	▪ Complete initial site walk noting obstructions near boreholes.

3.2 PHYSICAL HAZARDS

Major hazards associated with this project include working on or near operating drill rigs and slip/trip/fall during geologic mapping. Operating drill rigs expose workers to high noise levels, heavy objects and moving machinery. Workers may also be exposed to falling objects, tripping hazards, exposure to hot or cold weather and the need to lift and carry heavy objects. Workers involved in drilling and trenching in

areas of developed properties should also be aware of the possible presence of buried utility lines. The physical risks are listed below:

- Crush Hazard
- Pinching Hazard
- Moving Machinery
- Buried Utilities
- Traffic
- Falling Objects
- Slip, Trip, Fall
- Noise
- Weather

Many of these hazards are discussed below in greater detail. HAI employees and their subcontractors shall wear modified Level D PPE while on site. Each will carry onsite the required respirator should it be necessary to use it based on VOC conditions and work requirements.

3.2.1 Drilling Operations

Heavy equipment, such as drill rigs, present significant hazards to site personnel. The subcontractor responsible for drilling must enforce a safety program providing specific safety procedures. Site personnel and visitors must be aware of the various hazards associated with the operation of the drill rig. personnel should never stand beside, or to the rear of equipment, and should make sure to remain in the line-of-sight of the operator. Also, personnel should stay clear of any rotating equipment or swing zones.

3.2.2 Utilities and Electricity

Electrical safety will be of concern for those above ground activities using equipment or instrumentation that is powered by electricity or that is near the location of overhead electrical lines while drilling. Electrical cords or plugs will be equipped with a ground-fault circuit interrupter. The **drill rig mast/derrick must be always kept a minimum of 15 feet from overhead electrical lines.** Further details regarding standard procedures for work around electric lines are in the Standard Operating Procedures section.

For subsurface work, **underground utilities/cables must be identified and marked**, if applicable, by site personnel knowledgeable about the existence of such utilities prior to the commencement of drilling. This is to be accomplished for this project by 1) review of utility maps from Mojave Solar 2) use the services of USA Alert where applicable, and 3) hand auguring the upper 5 ft. depth at each deep boring location prior to beginning the HSA drill.

3.2.3 Slips/Trips/Falls

While working, care must be taken when moving around the project site. It is likely that there are changes in elevation such as ruts or holes in the ground, broken pavement, berms, edges, etc. Site personnel should be aware of their surroundings on-site to reduce the potential for slip, trip, and fall hazards. **One way to increase awareness of any potential trip and fall hazards may be to mark them with a bright flag or marker.**

3.2.4 Lifting

The use of some field equipment may involve heavy lifting. To assure personnel safety, the following lifting guidelines will be employed at the site:

- Use two individuals to lift heavy objects.
- Assure steady footing when lifting the load.
- Remind workers to spread their feet no wider than the width of their shoulders when lifting.
- Use only one person to give commands when teams are lifting.
- Lift with legs rather than the back.

3.2.5 Drilling Operations

Heavy equipment, such as drill rigs, present significant hazards to site personnel. The subcontractor responsible for drilling must enforce a safety program providing specific safety procedures. Site personnel and visitors must be aware of the various hazards associated with the operation of the drill rig. Specifically, personnel should never stand besides, or to the rear of equipment, and should make sure to remain in the line-of-sight of the operator. Also, personnel should stay clear of any rotating equipment or swing zones.

3.3 CHEMICAL HAZARDS

There is some potential for exposure to soils contaminated with Biphenyl (CAS N0. 92-52-4), and Diphenyl Ether (CAS No. 101-84-8) during drilling and sampling activities of the exploration program. The manufacture's Safety Data Sheet for Therminol VP1 is included as Attachment B-2. Also, some southern California soils contain high concentrations of naturally occurring heavy metals (e.g. lead, arsenic, copper etc.). The hazards are reduced by limiting dust-generating activities and by protecting against skin contact with product or contaminated sediment. Thus, personnel will wear modified Level D Personal Protective Equipment (PPE) including Nitrile-based gloves to reduce contact with potential contaminants.

3.3.1 Heavy Metals

Heavy metals can produce a wide variety of harmful effects and symptoms in the human body. Based on the field activities that are planned for this project, there is a likelihood of elevated, airborne, heavy metals concentrations, particularly lead from aerially distributed lead from the long-term traffic on the roadway. Heavy metals may be transported via dust particles. Whenever possible, personnel will position themselves upwind of the exploratory activities as an extra precautionary measure. Watering of the ground surface may also be implemented to reduce dust. It is possible that skin contact will present a slight health threat. Therefore, personnel will be protected from skin contact with potentially contaminated sediments by wearing Nitrile work gloves.

3.3.2 Volatile Organic Compounds

Although the potential for exposure to VOC vapors is considered low, there is the possibility that inhalation health threat or direct contact threat may exist with respect to hydrocarbon and other VOC-contaminated soil and/or vapors during the sampling activities. Routine air monitoring will be performed during the field exploration program and workers should be aware of the potential hazard. The monitoring will have a set trigger of 50 ppm for VOCs an alarm will be sounded if the trigger is exceeded. All workers will move upwind of the drilling operations, notify the SSO and PM and note air monitoring results with

the photoionization detector (PID). Field staff will wear modified Level D PPE to prevent skin or eye contact with potential contaminants. Also, smoking, which can acerbate inhalation of VOCs, will not be allowed within 20 feet of the work zones.

Although considered to be low, the primary risk of exposure on this project is through skin contact with contaminated sediments. **Nitrile work gloves** will be worn to prevent skin contact with potential SVOC contaminants. The likelihood of elevated levels of airborne SVOCs is low, as most SVOCs have a low volatility. As SVOCs are sometimes associated with VOCs in air, routine air monitoring of VOCs will be conducted. If the VOC trigger level of 50 ppm is exceeded the work will stop and all workers will move upwind of the area and wait until the VOCs clear. Field staff will wear modified Level D PPE to prevent skin or eye contact with potential contaminants.

4.0 GENERAL HEALTH AND SAFETY REQUIREMENTS

4.1 EMPLOYEE CLEARANCE AND SITE SAFETY MEETINGS

Each employee assigned to the fieldwork described in this HASP must be:

(1) given a personal copy of this HASP by the SSO;

(2) briefed on the health and safety requirements of this HASP by the SSO; and

(3) Must acknowledge receipt of and willingness to comply with the provisions of the HASP by signing the attached acknowledgement agreement. Individuals refusing to sign the agreement will not be permitted to conduct field work for this project.

Completed agreements shall be provided to the HSO. Completing the above three items provide an employee with the necessary clearance to perform fieldwork for the project.

Regular daily briefings (tailgate safety sessions) will be conducted by the SSO or their designated representative. The tailgate sessions will review the safety requirements set forth in this HASP. The session will also provide a forum for field personnel to discuss any additional safety issues and provide recommendations for changes in procedures and updating this HASP. Each tailgate session shall be documented using the form provided in Attachment B-3.

4.2 INCIDENT REPORTING

If an incident relating to worker health and safety, such as an accident, illness, or unexpected chemical exposure occurs at the project, the Project Manager (PM) or SSO must report the incident to the Corporate Health and Safety Officer using **the accident/incident form** (see Attachment B-4). This form defines the types of incidents which must be reported and the time frame within which these reports must be made. The SSO shall immediately contact Mojave Solar in the event of any accident or health and safety incident.

4.3 PROHIBITED ON-SITE ACTIVITIES

The following are prohibited on-site activities:

- Operating motor vehicles without a valid driver's license;
- Operating a motor vehicle after consuming alcohol or other controlled substance; and
- Smoking while operating equipment, within a 20 foot radius of the borehole, or anytime hazardous vapors are suspected.

5.0 SITE SPECIFIC HEALTH AND SAFETY REQUIREMENTS

5.1 SPECIAL TRAINING

Field personnel involved in collecting samples for environmental analysis will have a current 40-hour Hazardous Materials Safety Course Certificate [OSHA 1910.120(e) (8)] and certificate of having completed the annual 8-hour refresher training. The documentation will be provided to the HSO prior to commencement of the work or prior to a different worker coming to the site (e.g., replacement due to illness or family emergency).

5.2 PERSONAL PROTECTIVE EQUIPMENT (PPE)

To protect personnel from potential site health and safety hazards, minimum PPE requirements have been established. These requirements do not preclude the need to conduct air monitoring, nor do they preclude the need to amend PPE requirements as conditions warrant. Any amendment to the minimum PPE requirements must first be approved by the SSO and PM. Site personnel, at their own discretion, may increase, but not decrease, the degree of respiratory protection and PPE used.

5.3 PERSONAL PROTECTIVE EQUIPMENT DESIGNATIONS

The minimum PPE requirements depend on the specific type of activity being performed. These PPE requirements are identified using designations similar to those defined by the Environmental Protection Agency (EPA) as EPA Level A, EPA Level B, EPA Level C, and EPA Level D. EPA Level A, B, or C is not anticipated for the current scope of work. A slight deviation from EPA's Level D will be used during drilling and sampling activities; therefore, the term "modified" shall be used. PPE shall meet the current American National Standards Institute (ANSI) standards.

5.4 MODIFIED LEVEL D PPE REQUIREMENTS

Work uniform or at a minimum long pants and long sleeve shirt shall be worn by field staff. Additionally, the following PPE are required in the field:

- Steel-toed boots
- Work gloves
- Hearing protection (when required)
- Hard-hat
- Safety glasses
- High visibility traffic vest

As indicated previously, there is a potential for exposure to hazardous waste/materials during the course of this project. The primary hazards associated with the drilling operations are potential contaminant exposure, and various physical hazards. With the use of appropriate PPE, air monitoring equipment, awareness, and first aid/emergency response equipment, these hazards should be kept to a minimum.

5.5 DRILLING AND SOIL SAMPLING ACTIVITIES

Drilling, soil sampling activities will be performed with a minimum PPE requirement of Modified Level D. If PID measurements indicate readings above the **action levels specified in Table A-2**, an upgrade to Modified Level C may be required. Appropriate decontamination of equipment, tools, and personnel prior to leaving the Exclusion Zone will be performed to reduce the potential for cross contamination. In the

event that unusual soil or waste material is identified during drilling or actionable atmospheric monitoring concentrations are detected, Mojave Solar shall be notified, and work is to stop until the SSO and PM determine it is safe and appropriate to proceed. In the event drilling activities are not completed at shift's end, the boring will be covered with a traffic-rated steel plate or ¾" plywood sheet with the bucket or auger placed on the cover to prevent removal. Removal of the plate should be performed with non-sparking attachment devices if the presence of gas or other combustibles is suspected.

5.6 SITE VISIT/SITE SURVEY

A minimum of modified Level D PPE will be required for any personnel in the work areas during site visits.

5.7 DECONTAMINATION ACTIVITIES

The minimum level of PPE required for personnel performing decontamination activities is Level D. If a change in site conditions warrants personnel to don higher than Level D PPE, the same level of PPE will be donned during decontamination activities.

6.0 WORK ZONE AIR MONITORING AND PERSONAL MONITORING

6.1 WORK ZONE AIR MONITORING

Exclusion zone and location-specific (over the borehole) monitoring will be routinely performed during the drilling activities, due to the potential for airborne vapor hazards. The air monitoring equipment shall be calibrated in accordance with the manufacturer's guidelines on a daily basis prior to the start of that day's field activities.

Monitoring of the air within the work zone should be performed routinely during above ground drilling activities. However, if at any time airborne concentrations are detected above the action levels, monitoring frequency will be increased. If sustained elevated levels are detected by the meter(s), workers will either evacuate the area for a sufficient period of time to allow the concentrations to return to normal, or the decision to upgrade the level of PPE will be made. If actionable concentrations of monitored gases are identified and do not return to normal concentrations within a reasonable amount of time, evacuate and secure the area, the area will be evacuated and secured, and the HSO/CIH, PM, and the City will be immediately notified.

There is a low potential that contaminants present in the sediments could pose an airborne particulate concern. However, efforts will be taken to minimize the visible dust generated during the project. As long as there are no visible dust emissions, perimeter dust monitoring will not be performed.

6.2 PERSONAL EXPOSURE MONITORING

No personal exposure monitoring will be performed during the drilling and sampling activities on this project. If new information concerning the presence of contamination is discovered during these activities, the HASP will be revised, and depending on the type and frequency of contaminants identified, personal exposure monitoring may be implemented.

Table B-2. Action Levels

Constituent	Action Level	Action
Volatiles (PID)	50 ppm	Clear Drilling Area by 20 feet minimum upwind. Retest site after 2 minutes.

7.0 STANDARD OPERATING PROCEDURES

The standard operating procedures (SOPs) in this section describe the required actions common to the project. These SOPs describe precautions or procedures that are required of personnel involved in any of the field activities.

7.1 SITE GUIDELINES

The following are general guidelines, which shall be followed during all on-site field activities:

- If the PID meter detects elevated levels VOC gas during the field activities, the work shall stop, and all field staff will move up wind of the location until either the levels have decreased to normal (relative to the background reading obtained prior to the start of the project) or alternative engineering or administrative controls have been implemented to lower the levels.
- Maintain line-of-sight with the drill rig operator during drilling operations.
- Personnel shall be properly trained in accordance with federal and state regulations and copies of the applicable training certificates should be present at the job site.
- Personnel shall wear the proper PPE selected for each work task.

All PPE shall be inspected prior to and after wearing. Any defective or damaged PPE shall be tagged as prohibited for use and removed from the site for either repair by an authorized person or destroyed.

- No contaminated tools or sampling equipment are allowed outside the immediate work area.
- No eating, drinking, chewing of tobacco, or smoking in areas that are suspected of being contaminated.
- In the event PPE is ripped or torn, remove the damaged PPE from the site and replace as soon as possible.
- Be alert to any unusual changes in your own condition; never ignore warning signs.
- IMMEDIATELY notify the PM or HSO of any accidents or near misses.
- Be familiar with the site's emergency response procedures and routes of escape.

- Always note the wind direction. Personnel shall remain upwind whenever possible during on-site activities.
- Never climb over or under obstacles that would endanger you or others.
- Hands and face should be thoroughly washed before eating, drinking, or using the restrooms.

7.2 CONFINED SPACE ENTRY

The planned work activities for this project will NOT involve entry into confined spaces.

7.3 FALL PROTECTION

The planned work activities for this project will not require the use of fall protection equipment.

7.4 ELECTRICAL SAFETY

Overhead power lines, downed electrical wires, and buried cables all pose a danger of shock or electrocution if personnel or equipment contact them during site operations. Utility locating activities, electrical equipment used on site, and lightning may also pose a hazard to site personnel. The following procedures have been developed to reduce these potential electrical hazards.

- Low-voltage equipment with ground-fault circuit interrupters and watertight, corrosion resistant connecting cable should be used on site.
- Electrical cords should be inspected for wear daily.
- Electrical cords should be placed so that heavy equipment or repetitive wear is avoided.
- Weather conditions should be monitored, and work should be suspended during electrical storms. Equipment operation should be halted, and personnel are to maintain at least a 20-foot distance from equipment in the event of a lightning storm.
- During drilling and trenching activities, the equipment will be separated by at least 15 feet from any overhead power transmission lines.
- To prevent contact with buried utility lines, the PM or his/her designee must contact local representatives of the telephone, electric, gas companies and other buried utilities to have buried lines located and marked. All contact with utility representatives must be documented.

7.5 ILLUMINATION

Night work is not anticipated during this project. However, the following procedures should be implemented if work is extended into the night. The work area and support zones shall be illuminated with a minimum of 5 foot-candles of artificial light. Locker rooms, restrooms, and changing areas shall have a minimum of 10 foot-candles of light.

7.6 MOTORIZED EQUIPMENT

Motorized equipment includes drill rigs, backhoes, trucks, and automobiles. It is important to remember that the load being handled, dusty conditions, complicated terrain or other equipment may obscure the operator's visibility. The following procedures have been developed to reduce and/or eliminate these potential hazards.

- Site personnel must make their presence known.

- Back-up alarms are required on all equipment, per OSHA requirements in 29 Code of Federal Regulations (CFR) 1926.602(a) (9).
- Operators must stay in moving equipment and wait until it stops before getting off.
- Personnel must be aware of rotating equipment. Do not wear loose clothing or jewelry. Tie long hair back.
- Observe traffic patterns and stay out of the way (minimum of 3-foot distance from the perimeter of the traffic control zone must be maintained at all times). Drill rigs and employee vehicles should be marked with orange traffic cones.

Assure equipment is in working order. Equipment will be checked daily as per OSHA requirements in 29 CFR 1926.601(b) (14).

7.7 PEDESTRIAN TRAFFIC CONTROL

The work covered by this HASP will take place in an area where pedestrian traffic is not anticipated. Staff should be aware of persons approaching the rig. Safety tape should be erected around the drill rig working area if necessary.

8.0 PERSONAL DECONTAMINATION

As there is potential for contact with contaminants or hazardous materials/wastes, the following decontamination steps should be followed.

- Step 1: Scrub boots with soap and water, or remove outer boot covers.
- Step 2: Remove hard-hat and wipe clean.
- Step 3: Remove gloves or any other clothing that was in contact with the contaminated media, place inside doubled, heavy-duty garbage bags or steel drums for proper disposal.
- Step 4: Depart the work area.
- Step 5: Wash hands, face, and neck before breaks and lunch.

Drilling and sampling equipment decontamination procedures are described in the SOPs included in Appendix A.

9.0 EMERGENCY RESPONSE AND ACCIDENT PREVENTION

In the event of an emergency, personnel shall move to an area clear of the drilling rig. The SSO will evaluate the nature of the injury or emergency and will determine the appropriate actions to take. As soon as possible, the PM will be notified. First aid treatment other than for minor cuts or abrasions should be administered by the medical staff located at the nearest hospital, i.e. Barstow Community Hospital
555 S 7th Ave, Barstow, CA 92311(760) 256-1761 or by emergency response personnel. **See Attachment B-5 for a map showing the location of the nearest hospital in the project area. Police, fire, or medical assistance can be summoned by calling 911.** Each HAI employee shall have a cellular phone on their person while working on site.

9.1 EMERGENCY EQUIPMENT

Emergency equipment including first aid kits will be located in the employee's vehicle. The equipment will be readily available in the event of an accident and all site personnel will be aware of its location prior to the start of work.

- First aid kit with enough supplies adequate for the number of site personnel.
- A mobile telephone.

9.2 CONTACTS

The personnel listed in Table B3 are the primary points of contact for health and safety related matters at the site. These personnel are also the points of contact to be notified in the event of an accident or incident.

Table B-3. Site Contacts

Title/Contact	Name	Telephone
Mojave Solar Project Manager	Mahnaz Ghamati	O: 760-308-0418 C: 760-498-0549
HAI Project Manager Assistant Project Manager	Ben Hushmand, PhD, PE Santosh Bhattarai, MS, PE	O: 949-777-1266 O: 949-777-1273
HAI Health and Safety Manager	Arash Hushmand	O: 949-777-1266 C: 949-394-8942
HAI Field Geologist/SSO	Barzin Sharifi	O: 949-777-1266 C: 949-874-8585

9.3 ACCIDENT/INCIDENT REPORTING

Accidents and/or near-miss incidents shall be reported, treated, investigated, and mitigated as soon as possible. Accidents or near-miss incidents that occur on site will be reported immediately to the PM. The HSO will investigate the accident or near miss incident and complete the Accident/Incident Field Report Form located in Attachment B-5. The cause shall be removed from site or isolated/demarcated to reduce the hazard(s) and the chance of a reoccurring accident or near-miss incident. The SSO will notify the PM within 24 hours of an accident or near miss incident.

10.0 TRAINING

It is HAI policy to require all personnel on site to have completed the applicable training for the tasks to be performed as required by the applicable OSHA Regulations. All personnel entering the site shall receive site-specific Hazard Communication training and shall be familiar with this HASP. Site-specific training shall include at least:

- the description of chemical and physical hazards associated with the project;

- site control, monitoring, and standard operating procedures that are applicable to the project;
- location of emergency response equipment;
- accident/incident procedures; and
- The location of the nearest hospital.

Acknowledgement of these requirements shall be documented by signing the Acknowledgement Form located in Attachment B-1. Personnel operating heavy equipment (drill rig) shall be properly trained and shall provide proof of this training, if requested and records are available. Training requirements for site personnel will be reviewed by the PM to assure compliance with this HASP.

An initial (pre-entry) safety meeting will be held prior to the start of on-site work. This safety meeting will be documented on the Daily Meeting (Attachment B-2), and any questions about the HASP will be answered. In addition, the pre-entry safety meeting will review site safety rules and prohibitions, the location of emergency equipment such as eye wash stations and fire extinguishers, escape routes, accident reporting, directions to the nearest medical facilities, how to summon medical assistance, and PPE requirements for the specific tasks. This safety training should enable site personnel to perform their work in a safe manner.

Safety meetings will be held daily at the beginning of each shift. These meetings are conducted to review pertinent aspects of site operations and to establish safe working procedures for those operations. All field staff will be required to sign the Daily Meeting Log in Attachment B-2 or in the field logbook. If determined necessary, additional safety meetings will be held to address deficiencies noted or procedural improvements that could be made based on the previous day's activities. All safety meetings will be documented.

11.0 MEDICAL SURVEILLANCE AND RECORDKEEPING

All workers on site will currently be under a medical surveillance program which involves annual physical including blood tests, respiratory capability to wear respirator, and special examination and testing if they have had a prior exposure. Documentation of the status of each workers program will be provided to the HSO prior to commencement of the onsite work.

The safety and health-related records or logs that are required to be maintained for personnel working at the site include:

- Pertinent training records for all personnel.
- Accident/Incident reports.
- Employee/visitor register (may be part of logbook).
- SSO field and safety meeting notes and site inspection records.
- Environmental and employee exposure monitoring records (if required).

Questions regarding this Health and Safety Plan should be referred to Ben Hushmand, PhD, PE.

ATTACHMENT B-1
SITE-SPECIFIC HEALTH & SAFETY ACKNOWLEDGEMENT FORM

SITE-SPECIFIC HEALTH & SAFETY ACKNOWLEDGEMENT FORM

I have read the Site-Specific Health & Safety Plan and understand the hazards, precautions required, and responsibilities involved in working at this site.

NAME	SIGNATURE	DATE

ATTACHMENT B-2

SAFETY DATA SHEET THREMINOL VP1

Therminol® VP1 Heat Transfer Fluid

Version	Revision Date:	SDS Number:	Date of last issue: 12/21/2022
1.5	03/02/2023	150000093459	Date of first issue: 09/06/2016
PRD		SDSUS / Z8 / 0001	

SECTION 1. IDENTIFICATION

Product name : Therminol® VP1 Heat Transfer Fluid

Product code : 34152-00, P3415203, P3415202, P3415200, E3415201

Manufacturer or supplier's details

Company name of supplier : Eastman Chemical Company

Address : 200 South Wilcox Drive
Kingsport TN 37660-5280

Telephone : (423) 229-2000

Emergency telephone : CHEMTREC: +1-800-424-9300, +1-703-527-3887 CCN7321

Recommended use of the chemical and restrictions on use

Recommended use : Heat transfer fluids

Restrictions on use : None known.

SECTION 2. HAZARDS IDENTIFICATION

GHS classification in accordance with the OSHA Hazard Communication Standard (29 CFR 1910.1200)

Acute toxicity (Inhalation) : Category 4

Skin irritation : Category 2

Specific target organ toxicity - single exposure : Category 3 (Respiratory system)

GHS label elements

Hazard pictograms :

Signal Word : Warning

Hazard Statements : H315 Causes skin irritation.
H332 Harmful if inhaled.
H335 May cause respiratory irritation.

Precautionary Statements : **Prevention:**

P261 Avoid breathing mist or vapors.
P264 Wash skin thoroughly after handling.
P271 Use only outdoors or in a well-ventilated area.
P280 Wear protective gloves.

Response:

P302 + P352 IF ON SKIN: Wash with plenty of soap and water.
P304 + P340 + P312 IF INHALED: Remove person to fresh air and keep comfortable for breathing. Call a POISON CENTER/ doctor if you feel unwell.
P332 + P313 If skin irritation occurs: Get medical advice/ attention.
P362 Take off contaminated clothing and wash before reuse.

Storage:

P403 + P233 Store in a well-ventilated place. Keep container tightly closed.
P405 Store locked up.

Disposal:

P501 Dispose of contents/ container to an approved waste disposal plant.

Other hazards

None known.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Components

Chemical name	CAS-No.	Concentration (% w/w)
diphenyl oxide	101-84-8	>= 70 - < 90
Biphenyl; diphenyl	92-52-4	>= 20 - < 30

Eastman is committed to the safety, health and environment of our employees, our customers, and the communities we operate within. As part of this commitment, Eastman's Safety Data Sheets (SDS) are prepared in accordance with all applicable national and local regulations. The compositions of our documents reflect these requirements which include, but are not limited to, requirements under the Globally Harmonized System of Classification and Labeling (GHS). These compositions commonly involve the use of ranges versus specific analytical values. If you require a composition that is more specific , please refer to the Certificate of Analysis, sales specification, or contact your Customer Service Representative.

SECTION 4. FIRST AID MEASURES

If inhaled : Remove person to fresh air and keep comfortable for breathing.
If breathing is difficult, give oxygen.
Consult a physician if necessary.

In case of skin contact : Wash off immediately with soap and plenty of water while

removing all contaminated clothes and shoes.
If skin irritation occurs: Get medical advice/ attention.
Wash contaminated clothing before reuse.

In case of eye contact : In case of contact, immediately flush eyes with plenty of water for at least 15 minutes.
Get medical attention if symptoms occur.

If swallowed : IF SWALLOWED: Immediately call a POISON CENTER/ doctor.
Do NOT induce vomiting.
Rinse mouth.
Never give anything by mouth to an unconscious person.

Most important symptoms and effects, both acute and delayed : Causes skin irritation.
May cause respiratory irritation.
The molten product can cause serious burns.
Harmful if inhaled.

Notes to physician : Treat symptomatically.

SECTION 5. FIRE-FIGHTING MEASURES

Suitable extinguishing media : Water spray
Carbon dioxide (CO2)
Dry chemical
Foam

Unsuitable extinguishing media : Do not use a solid water stream as it may scatter and spread fire.

Hazardous combustion products : Hazardous decomposition products due to incomplete combustion
Carbon oxides

Further information : Use a water spray to cool fully closed containers.
Do not allow run-off from fire fighting to enter drains or water courses.

This product is not classified as a fire-resistant heat transfer fluid. Precautions to avoid sources of ignitions should be taken.

Special protective equipment for fire-fighters : Wear an approved positive pressure self-contained breathing apparatus in addition to standard fire fighting gear.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures : Ventilate the area.
Avoid breathing dust/ fume/ gas/ mist/ vapors/ spray.
Avoid contact with skin and eyes.
Material can create slippery conditions.

Wear appropriate personal protective equipment.
Local authorities should be advised if significant spillages cannot be contained.

Environmental precautions : Clear up spills immediately and dispose of waste safely.
Avoid release to the environment.
Collect spillage.

Methods and materials for containment and cleaning up : Contain spillage, soak up with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and transfer to a container for disposal according to local / national regulations (see section 13).
Prevent runoff from entering drains, sewers, or streams.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling : Do not breathe vapors or spray mist.
Handle product only in closed system or provide appropriate exhaust ventilation at machinery.
In case of insufficient ventilation, wear suitable respiratory equipment.
Keep away from flames and sparks.
Wear appropriate personal protective equipment.
Avoid contact with skin, eyes and clothing.
Wash thoroughly after handling.
Wash contaminated clothing before reuse.
Drain or remove substance from equipment prior to break-in or maintenance.
Handle in accordance with good industrial hygiene and safety practice.

Conditions for safe storage : Store locked up.
Keep container tightly closed in a dry and well-ventilated place.
Keep in a cool place away from oxidizing agents.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Ingredients with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
diphenyl oxide	101-84-8	TWA (Vapor)	1 ppm	ACGIH
		STEL (Vapor)	2 ppm	ACGIH
		TWA (Vapor)	1 ppm 7 mg/m3	NIOSH REL
		TWA (Vapor)	1 ppm 7 mg/m3	OSHA Z-1
		TWA (Vapor)	1 ppm 7 mg/m3	OSHA P0

Biphenyl; diphenyl	92-52-4	TWA	0.2 ppm	ACGIH
		TWA	0.2 ppm 1 mg/m3	NIOSH REL
		TWA	0.2 ppm 1 mg/m3	OSHA Z-1
		TWA	0.2 ppm 1 mg/m3	OSHA P0

Engineering measures : Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

Personal protective equipment

Respiratory protection : Use a properly fitted, particulate filter respirator complying with an approved standard if a risk assessment indicates this is necessary.
Respirator selection, use, and maintenance must be in accordance with regulatory requirements, if applicable.
If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn.

Hand protection

Remarks : Wear suitable gloves. When handling hot material, use heat resistant gloves.

Eye protection : Wear safety glasses with side shields (or goggles).

Skin and body protection : Wear suitable protective clothing.

Protective measures : Ensure that eye flushing systems and safety showers are located close to the working place.

Hygiene measures : Handle in accordance with good industrial hygiene and safety practice.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance : liquid

Color : colorless

Odor : characteristic

Odor Threshold	:	not determined
pH	:	not determined
Melting point/range	:	54 °F / 12 °C
Boiling point/boiling range	:	495 °F / 257 °C (1,013 hPa)
Flash point	:	230 °F / 110 °C Method: Pensky-Martens closed cup 255 °F / 124 °C Method: Cleveland open cup
Evaporation rate	:	not determined
Self-ignition	:	1150 °F / 621 °C Method: ASTM D2155
Upper explosion limit / Upper flammability limit	:	Not applicable
Lower explosion limit / Lower flammability limit	:	Not applicable
Vapor pressure	:	not determined
Relative vapor density	:	not determined
Relative density	:	1.06 (77 °F / 25 °C)
Density	:	1,060 kg/m3 (77 °F / 25 °C)
Solubility(ies)		
Water solubility	:	0.025 g/l
Partition coefficient: n-octanol/water	:	Not applicable
Autoignition temperature	:	not determined
Decomposition temperature	:	not determined
Viscosity		
Viscosity, dynamic	:	not determined
Viscosity, kinematic	:	2.48 mm2/s (104 °F / 40 °C) 0.99 mm2/s (212 °F / 100 °C)
Explosive properties	:	Not classified

Oxidizing properties : Not classified

SECTION 10. STABILITY AND REACTIVITY

Reactivity : None reasonably foreseeable.

Chemical stability : Stable under normal conditions.

Possibility of hazardous reactions : None known.

Conditions to avoid : Heating in air.
Keep away from flames and sparks.

Incompatible materials : Strong oxidizing agents

Hazardous decomposition products : Emits acrid smoke and fumes when heated to decomposition.

SECTION 11. TOXICOLOGICAL INFORMATION

Acute toxicity

Harmful if inhaled.

Product:

Acute oral toxicity : LD50 (Rat): 2,050 mg/kg
Assessment: May be harmful if swallowed.

Acute inhalation toxicity : LC50 (Rat, male and female): 2.66 mg/l
Exposure time: 4 h
Test atmosphere: dust/mist
Assessment: Harmful if inhaled.

Acute dermal toxicity : LD50 Dermal (Rabbit): Assessment: Not classified

Components:

diphenyl oxide:

Acute oral toxicity : LD50 Oral (Rat, female): 2,830 mg/kg

Acute inhalation toxicity : LC50: Test atmosphere: vapor
Remarks: No data available

Acute dermal toxicity : LD50 Dermal (Rabbit, male and female): > 7,940 mg/kg

Skin corrosion/irritation

Causes skin irritation.

Product:

Species : Rabbit
Exposure time : 24 h

Assessment : Causes skin irritation.
Result : slight

Components:

diphenyl oxide:

Species : Rabbit
Exposure time : 4 h
Result : none

Biphenyl; diphenyl:

Species : Rabbit
Result : slight

Species : Humans
Assessment : Irritating to skin.
Result : strong

Serious eye damage/eye irritation

Not classified based on available information.

Product:

Species : Rabbit
Result : No eye irritation
Exposure time : 24 h
Assessment : Not classified

Components:

diphenyl oxide:

Species : Rabbit
Result : corneal opacity
Exposure time : 4 h
Assessment : irritating

Result : slight to moderate

Biphenyl; diphenyl:

Species : Rabbit
Result : slight irritation

Species : Humans
Result : strong
Assessment : Irritating to eyes.

Respiratory or skin sensitization

Skin sensitization

Not classified based on available information.

Respiratory sensitization

Not classified based on available information.

Product:

Remarks : No data available

Components:

diphenyl oxide:

Test Type	:	Skin Sensitization
Species	:	Guinea pig
Assessment	:	Not classified
Method	:	OECD 406: Guinea pig sensitization
Result	:	non-sensitizing

Test Type	:	Human experience
Species	:	Humans
Assessment	:	Not classified
Method	:	Human Repeat Insult Patch Test
Result	:	non-sensitizing

Biphenyl; diphenyl:

Test Type	:	OECD 406: Guinea pig sensitization
Species	:	Guinea pig
Assessment	:	Not classified
Result	:	Does not cause skin sensitization.

Germ cell mutagenicity

Not classified based on available information.

Components:

diphenyl oxide:

Genotoxicity in vitro : Test Type: Salmonella typhimurium assay (Ames test)
Metabolic activation: +/- activation
Method: Bacterial Reverse Mutation Assay
Result: negative

Test Type: Mutagenicity - Mammalian
Metabolic activation: +/- activation
Method: In vitro Mammalian Cell Gene Mutation Test
Result: negative

Test Type: Mutagenicity - Mammalian
Metabolic activation: +/- activation
Method: In vitro Mammalian Chromosome Aberration Test
Result: negative

Test Type: Mutagenicity - Mammalian
Metabolic activation: +/- activation
Method: OECD Guideline 482
Result: negative

Biphenyl; diphenyl:

Genotoxicity in vitro : Test Type: Salmonella typhimurium assay (Ames test)
Metabolic activation: +/- activation
Method: Bacterial Reverse Mutation Assay
Result: negative

Test Type: Mutagenicity - Mammalian
Metabolic activation: + activation
Method: In vitro Mammalian Cell Gene Mutation Test
Result: positive

Test Type: Chromosome aberration test in vitro
Metabolic activation: +/- activation
Method: In vitro Mammalian Chromosome Aberration Test
Result: negative

Test Type: Mutagenicity - Mammalian
Method: OECD Guideline 482
Result: negative

Genotoxicity in vivo : Species: Mouse (male and female)
Method: Mammalian Erythrocyte Micronucleus Test
Result: negative

Species: Rat (male)
Method: Mammalian Bone Marrow Chromosome Aberration Test
Result: negative

Carcinogenicity

Not classified based on available information.

Components:

Biphenyl; diphenyl:

Species	:	Rat, male and female
Application Route	:	Ingestion
Method	:	OECD Test No. 453: Combined Chronic Toxicity/Carcinogenicity Studies
Remarks	:	Expert judgment Not classified

IARC No ingredient of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

OSHA No component of this product present at levels greater than or equal to 0.1% is on OSHA's list of regulated carcinogens.

NTP No ingredient of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

Reproductive toxicity

Not classified based on available information.

Product:

Effects on fertility : Remarks: No data available

Components:

diphenyl oxide:

Reproductive toxicity - Assessment : Based on available data the classification criteria are not met. Not classified as hazardous.

Biphenyl; diphenyl:

Effects on fetal development : Species: Rabbit, female
Application Route: Oral
General Toxicity Maternal: NOAEL: 3,000 ppm
Embryo-fetal toxicity.: NOAEL: 8,000 ppm
Method: OECD Test Guideline 414

Species: Rat
Application Route: Oral
General Toxicity Maternal: NOAEL: 500 mg/kg body weight
Embryo-fetal toxicity.: NOAEL: 1,000 mg/kg body weight
Method: OECD Test Guideline 414

Reproductive toxicity - Assessment : Based on available data the classification criteria are not met. Not classified as hazardous.

STOT-single exposure

May cause respiratory irritation.

Components:

diphenyl oxide:

Routes of exposure : Inhalation
Assessment : Based on available data, the classification criteria are not met.

Biphenyl; diphenyl:

Routes of exposure : Inhalation
Target Organs : Respiratory system
Assessment : The substance or mixture is classified as specific target organ toxicant, single exposure, category 3 with respiratory tract irritation.

STOT-repeated exposure

Not classified based on available information.

Components:

diphenyl oxide:

Assessment : Based on available data, the classification criteria are not met.

Biphenyl; diphenyl:

Target Organs	:	Kidney, Liver, Urinary bladder
Assessment	:	The substance or mixture is not classified as specific target organ toxicant, repeated exposure.

Repeated dose toxicity

Product:

Species	:	Rat, male and female
	:	0.051 mg/l
Application Route	:	Inhalation study:
Exposure time	:	90 days

Species	:	Rat
LOAEL	:	500 mg/l
Application Route	:	by gavage

Components:

diphenyl oxide:

Species	:	Rat, male and female
NOAEL	:	301 mg/kg
Application Route	:	Oral Study
Exposure time	:	90 days
Remarks	:	(highest dose tested)

Species	:	Rat, male and female
NOAEL	:	1000 mg/kg
Application Route	:	Dermal Study
Exposure time	:	90 days
Remarks	:	(highest dose tested)

Species	:	Rat, male and female
NOAEL	:	139 mg/m3
Application Route	:	inhalation (vapor)
Exposure time	:	28 days
Remarks	:	(highest dose tested)

Biphenyl; diphenyl:

Species	:	Rat, male and female
NOAEL	:	39 mg/kg
Application Route	:	in feed
Exposure time	:	2 year
Method	:	OECD Test No. 453: Combined Chronic Toxicity/Carcinogenicity Studies
Target Organs	:	Blood, Kidney, Liver

Species	:	Rabbit
NOAEL	:	> 2,000 mg/kg
Application Route	:	Dermal

Exposure time : 28 days
Remarks : No significant adverse effects were reported

Aspiration toxicity

Not classified based on available information.

Product:

Not classified

Experience with human exposure

Product:

Inhalation : Remarks: Harmful if inhaled.
May cause respiratory irritation.

Skin contact : Remarks: Causes skin irritation.

Eye contact : Remarks: None known.

Ingestion : Remarks: None known.

Further information

Product:

Remarks : None known.

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

Components:

diphenyl oxide:

Toxicity to fish : LC50 (Oncorhynchus mykiss (rainbow trout)): 4.2 mg/l
Exposure time: 96 h

Toxicity to daphnia and other aquatic invertebrates : LC50 (Daphnia magna (Water flea)): 1.7 mg/l
Exposure time: 48 h

Toxicity to algae/aquatic plants : EC50 (Pseudokirchneriella subcapitata (algae)): 0.455 mg/l
Exposure time: 72 h

Biphenyl; diphenyl:

Toxicity to fish : EC50 (Pimephales promelas (fathead minnow)): 3 mg/l
Exposure time: 96 h

Toxicity to daphnia and other aquatic invertebrates : EC50 (Daphnia magna (Water flea)): 0.36 mg/l
Exposure time: 48 h

Toxicity to algae/aquatic : EC50 (Chlorella pyrenoidosa): 1.3 mg/l

plants		Exposure time: 72 h
		NOEC (Chlorella pyrenoidosa): 0.66 mg/l Exposure time: 72 h
M-Factor (Acute aquatic toxicity)	:	1
Toxicity to fish (Chronic toxicity)	:	NOEC (Oncorhynchus mykiss (rainbow trout)): 0.229 mg/l Exposure time: 96 d
Toxicity to daphnia and other aquatic invertebrates (Chronic toxicity)	:	NOEC (Daphnia magna (Water flea)): 0.17 mg/l Exposure time: 21 d
M-Factor (Chronic aquatic toxicity)	:	1

Persistence and degradability

Product:

Biodegradability	:	Remarks: No data available
Biochemical Oxygen Demand (BOD)	:	Remarks: No data available
Chemical Oxygen Demand (COD)	:	Remarks: No data available
BOD/COD	:	Remarks: No data available

Components:

diphenyl oxide:

Biodegradability	:	Result: Readily biodegradable. Method: Ready Biodegradability: Modified MITI Test (I)
Biochemical Oxygen Demand (BOD)	:	Remarks: No data available
Chemical Oxygen Demand (COD)	:	Remarks: No data available

Biphenyl; diphenyl:

Biodegradability	:	Result: Readily biodegradable. Method: Ready Biodegradability: Modified MITI Test (I)

Bioaccumulative potential

Components:

diphenyl oxide:

Bioaccumulation : Species: Cyprinus carpio (Carp)
Bioconcentration factor (BCF): 49 - 594
Method: OECD Test Guideline 305

Species: Oncorhynchus mykiss (rainbow trout)
Bioconcentration factor (BCF): 196

Biphenyl; diphenyl:

Bioaccumulation : Bioconcentration factor (BCF): 1,900

Mobility in soil

Components:

diphenyl oxide:

Distribution among environmental compartments : Koc: 1960, log Koc: 3.3

Biphenyl; diphenyl:

Distribution among environmental compartments : Medium: Soil
Koc: 1546, log Koc: 3.19
Method: OECD Test No. 106: Adsorption - Desorption Using a Batch Equilibrium Method

Other adverse effects

No data available

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Dispose of in accordance with local regulations.

This material when discarded may be a hazardous waste as that term is defined by the Resource Conservation and Recovery Act (RCRA), 40 CFR 261.24, due to its toxicity characteristic. This material should be analyzed in accordance with Method 1311 for the compound D018 BENZENE.
Consult 40 CFR 268.40 or appropriate local regulations for concentration based standards.
This product meets the criteria for a synthetic used oil under the U.S. EPA Standards for the Management of Used Oil (40 CFR 279). Those standards govern recycling and disposal in lieu of 40 CFR 260 -272 of the Federal hazardous waste program in states that have adopted these used oil regulations. Consult your attorney or appropriate regulatory official to be sure these standards have been adopted in your state. Recycle or burn in accordance with the applicable standards.
Eastman Chemical Company operates a used fluid return program for certain fluids under these used oil standards.

Contact your Sales Representative for details.

SECTION 14. TRANSPORT INFORMATION

International Regulations

IATA-DGR

UN/ID No.	:	UN 3082
Proper shipping name	:	Environmentally hazardous substance, liquid, n.o.s. (Diphenyl Ether, biphenyl)
Class	:	9
Packing group	:	III
Labels	:	Miscellaneous
Packing instruction (cargo aircraft)	:	964
Packing instruction (passenger aircraft)	:	964
Remarks	:	Shipping in package sizes of less than 5 L (liquids) or 5 KG (solids) may lead to a non-regulated classification.

IMDG-Code

UN number	:	UN 3082
Proper shipping name	:	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (Diphenyl Ether, biphenyl, diphenyl)
Class	:	9
Packing group	:	III
Labels	:	9
EmS Code	:	F-A, S-F
Marine pollutant	:	yes
Remarks	:	Shipping in package sizes of less than 5 L (liquids) or 5 KG (solids) may lead to a non-regulated classification.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

Domestic regulation

49 CFR

UN/ID/NA number	:	UN 3082
Proper shipping name	:	Environmentally hazardous substance, liquid, n.o.s. (biphenyl)
Class	:	9
Packing group	:	III
Labels	:	CLASS 9
ERG Code	:	171
Marine pollutant	:	yes(diphenyl)
Remarks	:	Shipping in package sizes of less than 5 L (liquids) or 5 KG (solids) may lead to a non-regulated classification.

Special precautions for user

The transport classification(s) provided herein are for informational purposes only, and solely based upon the properties of the unpackaged material as it is described within this Safety Data Sheet. Transportation classifications may vary by mode of transportation, package sizes, and variations in regional or country regulations.

SECTION 15. REGULATORY INFORMATION

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
Biphenyl; diphenyl	92-52-4	100	377

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 302 Extremely Hazardous Substances Threshold Planning Quantity

This material does not contain any components with a section 302 EHS TPQ.

SARA 311/312 Hazards : Acute Health Hazard

SARA 313 : The following components are subject to reporting levels established by SARA Title III, Section 313:

Biphenyl; diphenyl 92-52-4

California Prop. 65

This product does not contain any chemicals known to the State of California to cause cancer, birth, or any other reproductive defects.

The ingredients of this product are reported in the following inventories:

TCSI : On the inventory, or in compliance with the inventory

AIIC : On the inventory, or in compliance with the inventory

DSL : On the inventory, or in compliance with the inventory

ENCS : On the inventory, or in compliance with the inventory

ISHL : On the inventory, or in compliance with the inventory

KECI : On the inventory, or in compliance with the inventory

PICCS : On the inventory, or in compliance with the inventory

IECSC : On the inventory, or in compliance with the inventory

NZIoC : On the inventory, or in compliance with the inventory

TSCA : All substances listed as active on the TSCA inventory

TSCA list

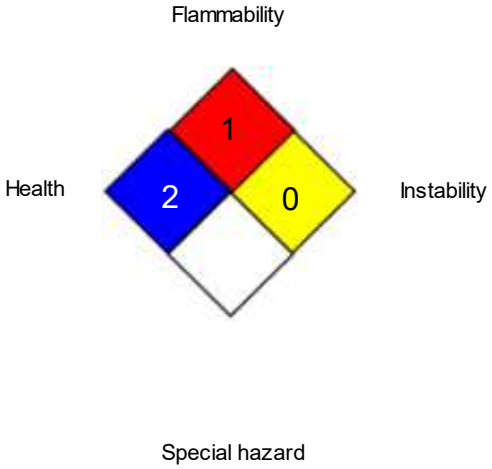
No substances are subject to a Significant New Use Rule.

No substances are subject to TSCA 12(b) export notification requirements.

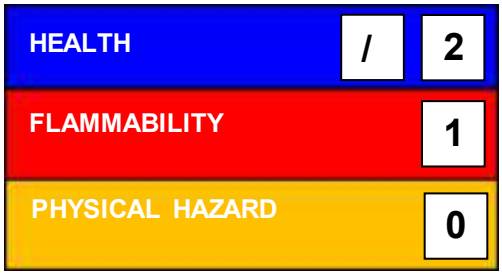
SECTION 16. OTHER INFORMATION

Further information

NFPA 704:



HMIS® IV:



HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. The "*" represents a chronic hazard, while the "/" represents the absence of a chronic hazard.

Full text of other abbreviations

ACGIH	:	USA. ACGIH Threshold Limit Values (TLV)
NIOSH REL	:	USA. NIOSH Recommended Exposure Limits
OSHA P0	:	USA. Table Z-1-A Limits for Air Contaminants (1989 vacated values)
OSHA Z-1	:	USA. Occupational Exposure Limits (OSHA) - Table Z-1 Limits for Air Contaminants
ACGIH / TWA	:	8-hour, time-weighted average
ACGIH / STEL	:	Short-term exposure limit
NIOSH REL / TWA	:	Time-weighted average concentration for up to a 10-hour workday during a 40-hour workweek
OSHA P0 / TWA	:	8-hour time weighted average
OSHA Z-1 / TWA	:	8-hour time weighted average

AIIC - Australian Inventory of Industrial Chemicals; ASTM - American Society for the Testing of Materials; bw - Body weight; CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act; CMR - Carcinogen, Mutagen or Reproductive Toxicant; DIN - Standard of the German Institute for Standardisation; DOT - Department of Transportation; DSL - Domestic Substances List (Canada); ECx - Concentration associated with x% response; EHS - Extremely Hazardous Substance; ELx - Loading rate associated with x% response; EmS - Emergency Schedule; ENCS - Existing and New Chemical Substances (Japan); ErCx - Concentration associated with x% growth rate response; ERG - Emergency Response Guide; GHS - Globally Harmonized Sys-

tem; GLP - Good Laboratory Practice; HMIS - Hazardous Materials Identification System; IARC - International Agency for Research on Cancer; IATA - International Air Transport Association; IBC - International Code for the Construction and Equipment of Ships carrying Dangerous Chemicals in Bulk; IC50 - Half maximal inhibitory concentration; ICAO - International Civil Aviation Organization; IECSC - Inventory of Existing Chemical Substances in China; IMDG - International Maritime Dangerous Goods; IMO - International Maritime Organization; ISHL - Industrial Safety and Health Law (Japan); ISO - International Organisation for Standardization; KECI - Korea Existing Chemicals Inventory; LC50 - Lethal Concentration to 50 % of a test population; LD50 - Lethal Dose to 50% of a test population (Median Lethal Dose); MARPOL - International Convention for the Prevention of Pollution from Ships; MSHA - Mine Safety and Health Administration; n.o.s. - Not Otherwise Specified; NFPA - National Fire Protection Association; NO(A)EC - No Observed (Adverse) Effect Concentration; NO(A)EL - No Observed (Adverse) Effect Level; NOELR - No Observable Effect Loading Rate; NTP - National Toxicology Program; NZIoC - New Zealand Inventory of Chemicals; OECD - Organization for Economic Co-operation and Development; OPPTS - Office of Chemical Safety and Pollution Prevention; PBT - Persistent, Bioaccumulative and Toxic substance; PICCS - Philippines Inventory of Chemicals and Chemical Substances; (Q)SAR - (Quantitative) Structure Activity Relationship; RCRA - Resource Conservation and Recovery Act; REACH - Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals; RQ - Reportable Quantity; SADT - Self-Accelerating Decomposition Temperature; SARA - Superfund Amendments and Reauthorization Act; SDS - Safety Data Sheet; TCSI - Taiwan Chemical Substance Inventory; TECI - Thailand Existing Chemicals Inventory; TSCA - Toxic Substances Control Act (United States); UN - United Nations; UNRTDG - United Nations Recommendations on the Transport of Dangerous Goods; vPvB - Very Persistent and Very Bioaccumulative

Sources of key data used to compile the Material Safety Data Sheet : www.therminol.com/products/

Revision Date : 03/02/2023

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

US / Z8

ATTACHMENT B-3

DAILY MEETING LOG

Job No._____

Boring(s) No._____

Page _____ of _____

DAILY MEETING LOG

Project Name: _____ Date: _____

Field Representative(s): _____

Work Site Location: _____

Physical Hazards: _____

_____

Chemical Hazards: _____

_____

Safety Equipment on Site: _____

Personal Protection Levels and Specific Equipment: _____

_____

Nearest Medical Facility: _____

First Aid Location: _____

Fire Suppression Device: _____

Spill Kit: _____

Emergency Phone Numbers: _____

Emergency Evacuation Route: _____

The above hazards and controls have been adequately explained to me.

Name	Company	Signature

Site Safety Officer: _____

Project Manager: _____

_____

Checked By:

_____

Date:

_____

ATTACHMENT B-4

ACCIDENT/INCIDENT FIELD REPORT FORM

ACCIDENT/INCIDENT REPORT FORM

(Filled out by Project Manager or employee, given to HSO/SSO, filed in employee's H&S record file)

Person notified (Ex: Site Mgr, HSO, SSO,or Project Manager): _____

Name of ill or injured person: _____

Date:_____ Time:_____ Supervisor: _____

Site Name and Location: _____

Weather (clear, rain, snow, etc.): _____

Nature of illness/injury: _____

_____

Symptoms: _____

_____

_____

Action Taken: Time off _____ First Aid_____ Medical _____Oxygen _____

Transported by: _____

Witnessed by: _____

Facility treating (Hospital's name): _____

Treatment: _____

Comments: _____

_____

_____

What was the person doing at the time of the accident/incident? _____

_____

Personal protection clothing worn and equipment used: _____

_____

Cause of accident/incident: _____

_____

_____

What immediate action was taken to prevent reoccurrence? _____

_____

Additional comments: _____

_____ _____

Reporting Employee's Signature Date Supervisor's Signature Date

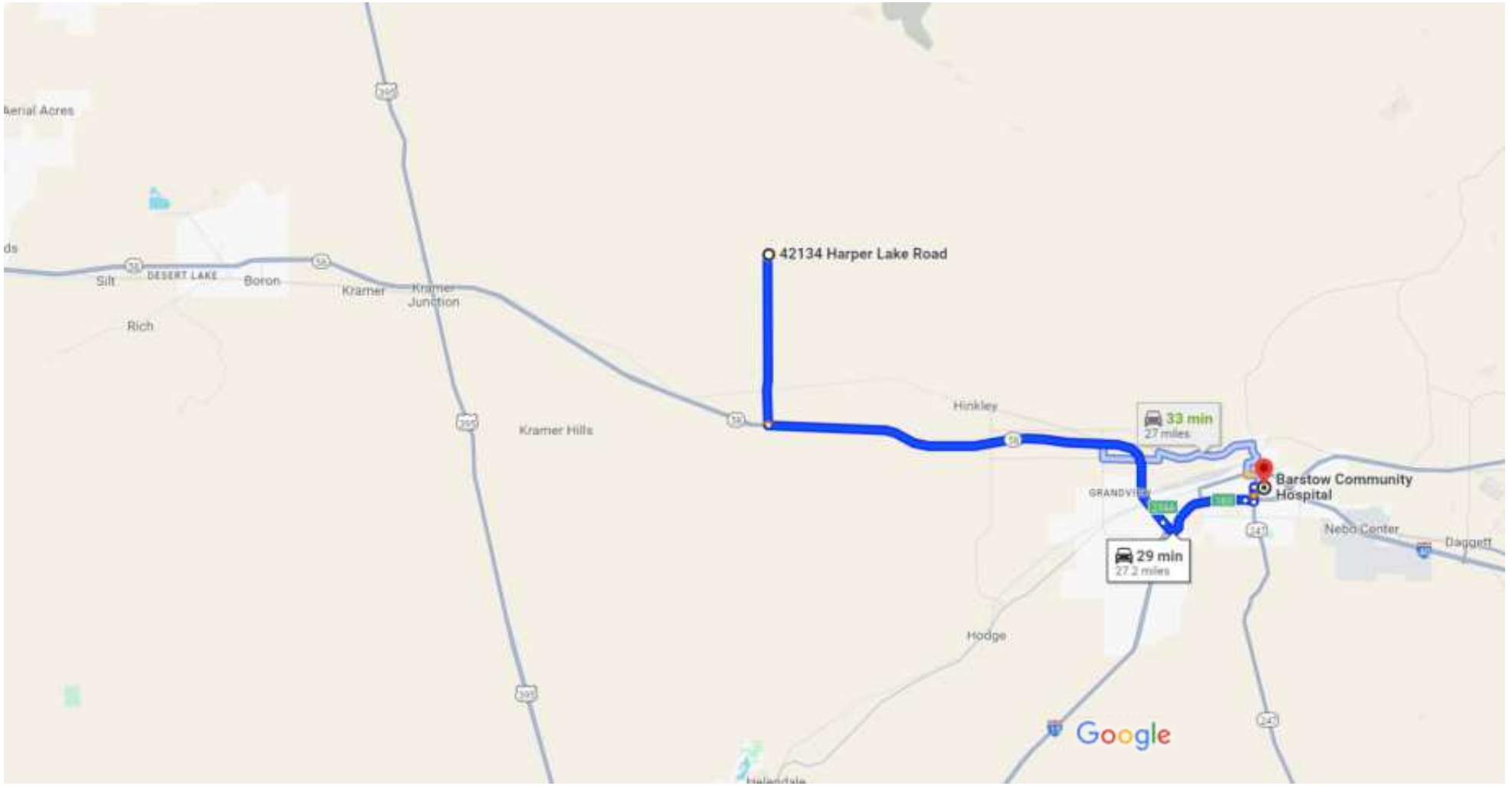
ATTACHMENT B-5

HOSPITAL ROUTE MAP

Google Maps

42134 Harper Lake Rd, Hinkley, CA 92347 to Barstow Community Hospital, 820 E Mountain View St, Barstow, CA 92311

Drive 27.2 miles, 29 min



via CA-58 E Fastest route now due to traffic conditions	29 min 27.2 miles
via Harper Lake Rd and CA-58 E	33 min

ATTACHMENT A

COPY OF NOV LETTER

August 18, 2025 GeoTracker Global ID: T10000005850

Mahnaz Ghamati
Quality, Environmental & Compliance Manager
Atlantica Sustainable Infrastructure LLC
43134 Harper Lake Toad
Hinkley, CA 93247
Mahnaz.ghamati@atlantica.com

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7017 1450 0001 3059 1819

Notice of Violation of Waste Discharge Prohibitions and California Water Code section 13243, Mojave Solar Facility, 43134 Harper Lake Road, Hinkley, San Bernardino County

The purpose of this Notice is to inform Mojave Solar LLC, subsidiary of Atlantica Inc., that Lahontan Regional Water Quality Control Board (Lahontan Water Board) staff is alleging a violation of Waste Discharge Prohibitions and California Water Code section 13243 for an unauthorized discharge of heat transfer fluid compounds to the Harper Valley Groundwater Basin from the Alpha East Land Treatment Unit (LTU). Lahontan Water Board staff discovered the alleged violation during review of the *Environmental Site Investigation Report*, prepared by Hushmand Associates, Inc. (dated October 2024). This violation is subject to additional enforcement, including administrative civil liability (fine) up to $10,000 for each day in which the violation occurs pursuant to California Water Code section 13385(c). Your response to this Notice will be taken into consideration by Lahontan Water Board staff when determining what, if any, additional enforcement to take.

VIOLATION

Unauthorized discharge of waste including biphenyl, diphenyl oxide and toluene to groundwater. Violation of Waste Discharge Prohibition II.A.1. and II.B.4., and California Water Code section 13243.

REQUIRED RESPONSE ACTIONS

1. Immediately cover the LTU with plastic sheeting (or alternative) to prevent infiltration of precipitation through the waste management unit. The covering must remain until cleanup goals have been achieved.

2. Submit a workplan by **Monday, November 17, 2025** to delineate the release to groundwater and remove secondary sources to groundwater contamination.

A. Signatory Requirements: The workplan must be prepared, signed, and stamped by an appropriately experienced California-licensed Professional Geologist or Professional Engineer.

B. Elements to be Included: Include the following items in the workplan:

a. Site Map: A map that graphically depicts the step-out locations where drilling and sampling will be conducted. Include the known direction of groundwater flow and gradient. Show the locations where the previous soil, soil vapor, and groundwater samples were collected to investigate the release from the LTU.

b. Tabulated Analytical Data: Tabulated analytical data for soil, soil vapor and groundwater that has been collected from the LTU.

c. Soil Vapor Sampling Information: A copy of the batch canister certification report for each vapor sampling canister and the name of the leak check compound used during sampling on July 18, 2024.

d. Sampling and Analysis Plan: A sampling and analysis plan (SAP) for groundwater, soil and soil vapor including the list of constituents to be analyzed, method of sample collection, depth of sample collection, frequency of sample collection and the name and certification of the analytical laboratory. Include the expected reporting limits and laboratory analytical method detection limits obtainable by the analytical laboratory.

e. Drilling Method: The proposed drilling method to collect samples and soil vapor probes.

f. Land Treatment Unit Construction Details: The as-built construction drawings for the land treatment units and a narrative discussion of deviations from the original plans.

g. Secondary Source Removal System: A proposed strategy to remove the chemical compounds in soil that are affecting groundwater.

C. Soil Logging: Log soil lithology according to the Unified Soil Classification System (USCS) using an appropriately experienced and California-licensed Professional Geologist or Professional Engineer.

D. Investigation Derived Waste Handling: Containerize and clearly labeled all investigation derived waste pending transport for offsite disposal. Label the containers in a manner that is easily interpreted by emergency response personnel as to the contents of the container. Remove the containers from the Site within 90 days of waste generation.

E. Permitting: Obtain boring permits prior to commencement of the approved scope of work.

3. Alternatively, if you believe that you have received this Notice in error, or that any of the information provided in this Notice is incorrect or incomplete, submit a written response explaining your position.

ADDITIONAL ENFORCEMENT

The Lahontan Water Board takes the above-referenced violation very seriously, as indicated by the significant fines that can be imposed for such violations. Additional days of violation will continue to accumulate until the conditions resulting in the alleged violations are corrected. As set forth above, your response to this Notice will be taken into consideration when staff is determining whether to take additional enforcement actions, including referring this case to the State Water Resources Control Board's (State Water Board) Office of Enforcement for legal action.

Electronic document submittal is required. Please upload all documents and correspondence regarding this case to the State Water Resources Control Board GeoTracker Data Management System under Global ID T10000005850.

If you have any questions regarding this notice, please contact Case Manager Kerri O'Keefe, Engineering Geologist, at (530) 542-5473 (kerri.okeefe@waterboards.ca.gov), or me at (530) 542-5420 (jeff.brooks@waterboards.ca.gov).

Jeff Brooks, PG
Senior Engineering Geologist
Chief – Cleanup, Site Investigation & Enforcement Unit

cc: Ashley Gutierrez, California Energy Commission
James Ackerman, California Energy Commission
Hurshbir Shahi, California Energy Commission
Alex Mayer, California Energy Commission
Timothy Middlemis-Clark, Lahontan Water Board
Shelby Barker, Lahontan Water Board
Kerri O'Keefe, Lahontan Water Board

ATTACHMENT B

COPIES OF THE TABLES CONTAINING THE ANALYTICAL RESULTS FOR SOIL, AND GRAB GROUNDWATER SAMPLES (2024 INVESTIGATION RESULTS)

Table 1. Summary of Laboratory Test Results- Soil Samples (Contd...)

Boring ID	Sample ID	Sample Collection Date	Sample Depth (ft below LTU surface grade 7-24) (A)	Diesel Range Organics (DRO) SW846 8015B			Gasoline Range and Light HC (EPA 8015B (M)) TPH GRO (C4-C12) mg/kg	Title 22 Metals (EPA 6010B/7471A)																								
				Biphenyl mg/kg	Diphenyl Oxide mg/kg	Diesel and Heavy HC (C13-C40) mg/kg		Antimony mg/kg	Arsenic mg/kg	Barium mg/kg	Beryllium mg/kg	Cadmium mg/kg	Chromium mg/kg	Soluble Chromium (CA WET) ug/L	Soluble Chromium (TCLP) ug/L	Cobalt mg/kg	Copper mg/kg	Lead mg/kg	Mercury mg/kg	Molybdenum mg/kg	Nickel mg/kg	Selenium mg/kg	Silver mg/kg	Thallium mg/kg	Vanadium mg/kg	Zinc mg/kg	1,1,1,2-Tetrachloroethane ug/kg	1,1,1-Trichloroethane ug/kg	1,1,2,2-Tetrachloroethane ug/kg	1,1,2-Trichloro-1,2,2-trifluoroethane ug/kg	1,1,2-Trichloroethane ug/kg
B-1	B-1 S-1 5'	07/18/2024	6.0	ND	ND		ND	ND	2.55	38.9	0.249	ND	8.43			2.76	6.58	4.17	0.0358	ND	4.22	ND	ND	ND	17.2	19.1					
	B-1 S-2 10'		11.0	ND	ND			ND	ND	27.5	ND	ND	3.51			1.32	3.83	2.66	0.033	ND	1.70	ND	ND	ND	7.53	9.44	ND	ND	ND	ND	ND
	B-1 S-3 15'		16.0	ND	ND		ND	ND	3.43	23.8	0.152	ND	5.68			1.80	5.4	2.32	0.0286	ND	2.80	ND	ND	ND	16.3	14					
B-2	B-2 S-1 1'	07/18/2024	2.0	ND	ND			ND	ND	20.5	ND	ND	3.39			1.46	3.24	2.37	0.0332	ND	2.16	ND	ND	ND	4.62	9.51	ND	ND	ND	ND	ND
	B-2 S-2 2.5'		3.5	ND	ND		ND	ND	2.62	38.00	0.242	ND	7.58			2.70	6.43	3.65	0.0307	ND	4.47	ND	ND	ND	17.2	19.5					
	B-2 S-3 5'		6.0	ND	ND			ND	2.61	28.6	0.171	ND	10.1			2.08	5.56	2.52	0.0332	ND	4.43	ND	ND	ND	13.4	16.1	ND	ND	ND	ND	ND
	B-2 S-4 7.5'		8.5	ND	ND		ND	ND	3.28	36.5	0.165	ND	5.91			2.20	4.78	2.97	0.0327	ND	2.88	ND	ND	ND	12.5	14.3					
	B-2 S-5 10'		11.0	ND	ND			ND	ND	11.1	ND	ND	2.37			0.772	2.01	1.58	0.0291	ND	1.20	ND	ND	ND	7.91	5.48	ND	ND	ND	ND	ND
	B-2 S-6 12.5'		13.5	ND	ND		ND	ND	ND	14.7	0.119	ND	2.61			0.988	2.71	1.74	0.0262	ND	1.58	ND	ND	ND	5.91	7.08					
	B-2 S-7 15'		16.0	ND	ND			ND	ND	30.9	ND	ND	4.77			1.38	4.18	2.13	0.0277	ND	1.66	ND	ND	ND	12.4	10.7	ND	ND	ND	ND	ND
	B-2 S-8 20'		21.0	ND	ND		ND	ND	2.51	19.6	0.122	ND	3.79			1.48	3.46	2.15	0.0291	ND	1.58	ND	ND	ND	13.4	10					
B-3	B-3 S-1 5'	07/17/2024	6.0	ND	ND			ND	ND	26.4	0.149	ND	5.57			1.87	4.68	3.30	0.0362	ND	2.85	ND	ND	ND	11.9	13.2	ND	ND	ND	ND	ND
	B-3 S-2 10'		11.0	ND	ND		ND	ND	ND	9.43	ND	ND	2.01			0.43	1.74	ND	0.0286	ND	ND	ND	ND	ND	6.33	4.72					
	B-3 S-3 15'		16.0	ND	ND			ND	2.67	24.7	0.22	ND	5.22			2.38	6.02	3.48	0.0259	ND	3.04	ND	ND	ND	15.6	14.9	ND	ND	ND	ND	ND
	B-3 S-4 20'		21.0	ND	ND		ND	ND	3.03	29	0.218	ND	5.42			2.12	5.04	3.48	0.0301	ND	2.93	ND	ND	ND	15.7	14.8					
B-4	B-4 S-1 1'	07/17/2024	2.0	ND	ND			ND	ND	44.1	0.248	ND	8.33			2.71	7.29	3.84	0.031	ND	4.38	ND	ND	ND	17.5	27.5	ND	ND	ND	ND	ND
	B-4 S-2 2.5'		3.5	6.0	28.0		ND	ND	2.33	45.6	0.254	ND	8.14			2.88	6.87	3.16	0.0337	ND	4.7	ND	ND	ND	17.8	20.8					
	B-4 S-3 5'		6.0	ND	ND			ND	ND	34.1	0.156	ND	7.41			2.40	6.12	3.78	0.0399	ND	4.14	ND	ND	ND	15.3	17.5	ND	ND	ND	ND	ND
	B-4 S-4 7.5'		8.5	ND	ND		ND	ND	3.54	35.7	0.236	ND	6.71			2.53	6.06	2.64	0.032	ND	4.05	2.16	ND	ND	15.5	16.4					
	B-4 S-5 10'		11.0	ND	ND			ND	ND	37	0.154	ND	4.26			1.17	3.96	2.11	0.0281	ND	1.96	ND	ND	ND	9.72	10.2	ND	ND	ND	ND	ND
	B-4 S-6 12.5'		13.5	ND	ND		ND	ND	ND	22.9	0.351	ND	10.3			3.93	7.54	4.26	0.0375	ND	5.69	ND	ND	ND	23.1	22.9					
	B-4 S-7 15'		16.0	ND	ND			ND	ND	18.9	0.193	ND	6.93			1.33	4.75	2.49	0.0326	ND	2.15	ND	ND	ND	16.6	12.2	ND	ND	ND	ND	ND
	B-4 S-8 20'		21.0	ND	ND		ND	ND	3.74	21.3	0.234	ND	5.34			1.33	3.72	2.46	0.0328	ND	2.14	ND	ND	ND	12.3	11.4					
B-5	B-5 S-1 1'	07/17/2024	2.0	ND	ND			ND	3.94	46.3	0.305	ND	8.67			3.39	7.05	3.84	0.0337	1.87	5.36	ND	ND	ND	17.9	21.3	ND	ND	ND	ND	ND
	B-5 S-2 2.5'		3.5	ND	ND		ND	ND	2.96	35.8	0.176	ND	7.74			2.71	6.23	2.79	0.035	ND	4.12	ND	ND	ND	16.4	19					
	B-5 S-3 5'		6.0	2,000	5,600			ND	2.75	25.8	0.146	ND	5.36			2.07	4.29	2.46	0.0299	ND	2.75	ND	ND	ND	11.4	12.4	ND	ND	ND	ND	ND
	B-5 S-4 7.5'		8.5	33.0	110.0		ND	ND	4.06	34.6	0.222	ND	7.51			2.79	6.18	3.29	0.0331	1.05	4.38	ND	ND	ND	17	17.6					
	B-5 S-5 10'		11.0	1.9	8.0			ND	2.57	29.8	0.218	ND	6.83			2.35	5.35	3.12	0.031	ND	3.68	ND	ND	ND	15.1	16.6	ND	ND	ND	ND	ND
	B-5 S-6 12.5'		13.5	ND	ND		ND	ND	ND	28.5	0.226	ND	6.13			1.97	4.3	2.42	0.028	1.29	2.67	ND	ND	ND	11.7	13.4					
	B-5 S-7 15'		16.0	ND	ND			ND	4.14	10.1	0.157	ND	3.94			0.896	3.47	1.77	0.0275	ND	1.55	ND	ND	ND	11.5	8.8	ND	ND	ND	ND	ND
	B-5 S-8 20'		21.0	ND	ND		ND	ND	1.91	9.94	0.0919	ND	2.87			0.845	2.3	ND	0.0287	ND	ND	ND	ND	ND	9.01	7.54					
B-6	B-6 S-1 5'	07/18/2024	6.0	1,800	5,100	**11,000**		ND	2.18	26.4	0.139	ND	5.68			1.92	4.55	1.86	0.034	1.11	2.81	ND	ND	ND	12.5	13	ND	ND	ND	ND	ND
	B-6 S-2 10'		11.0	ND	ND	ND	ND	ND	4.3	17.7	0.13	ND	4.83			1.48	4.15	2.67	0.027	ND	2.59	ND	ND	ND	14.5	11.5					
	B-6 S-3 15'		16.0	ND	ND	ND		ND	3.23	31	0.2	ND	4.84			2.0	4.61	1.90	0.0266	ND	2.28	ND	ND	ND	14.5	12.4	ND	ND	ND	ND	ND
	B-6 S-4 40'		41.0	ND	ND	ND	0.079	ND	12	146	1.44	ND	**52.4**	ND	ND	17.7	51.7	15.3	0.0463	1.7	37.2	ND	ND	ND	102	108					
From 2024 (by others)	E-1	02/21/2024	5.25-5.75 (B)	ND	ND																										
	E-2	02/21/2024	6.4-6.9 (B)	11.0	160.0																										
	E-3	02/21/2024	6.4-6.9 (B)	ND	2,500																										
HA-1	HA-1 @ 1-1.5 ft	07/23/2024	1 - 1.5			ND	ND																								
	HA-1 @ 2-2.5 ft		2 - 2.5			ND	ND																								
HA-2	HA-2 @ 1-1.5 ft	07/23/2024	1 - 1.5			ND	ND																								
	HA-2 @ 2-2.5 ft		2 - 2.5			ND	ND																								
HA-3	HA-3 @ 1-1.5 ft	07/23/2024	1 - 1.5			ND	ND																								
	HA-3 @ 2-2.5 ft		2 - 2.5			ND	ND																								
Stockpile	Native S-1	07/23/2024	-																												
	Native S-2		-																												
Therminol Screening Level--CAP				100	100																										
Trigger Level for Performing State Leachate Analysis (10×STLC) (B)				NE	NE	NE	NE	150	50	1,000	8	10	50	50	NA	800	250	50	2	3,500	200	10	50	70	240	2,500	5	NE	NE	NE	NE
Trigger Level for Performing State and Federal Leachate Analysis (20×TCLP) (B)				NE	NE	NE	NE	NE	100	2,000	NE	20	100	NA	100	NE	NE	100	4	NE	NE	20	100	NE	NE	NE	10	NE	NE	NE	NE
State Hazardous Disposal Criteria (TTLC) (B)				NE	NE	NE	NE	500	500	10,000	75	100	2,500	NE	NE	8,000	2,500	1,000	20	3,500	2,000	100	500	700	2,400	5,000	NE	NE	NE	NE	NE
STLC (mg/L) (B)				NE	NE	NE	NE	15	5	100	1	1	5	5	NA	80	25	5.0	0.2	350	20	1	5	7	24	250	1	NE	NE	NE	NE
TCLP (mg/L) (B)				NE	NE	NE	NE	NE	5	100	NE	1	5	NA	5	NE	NE	5.0	0.2	NE	NE	1	5	NE	NE	NE	0.5 UG/l	NE	NE	NE	NE
DTSC HHRA Screening Level--Commercial/Industrial CANCER (C)				200	NE	NE	NE	NE	12 (E)	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	64,000	NE	NE	NE	NE	NE	8.8	NE	2.7	NE	NE
DTSC HHRA Screening Level--Commercial/Industrial NON-CANCER (C)				260	NE	18,000	500	NE	12 (E)	NE	NE	NE	NE	NE	NE	NE	NE	500.0	4.4	NE	11,000	NE	NE	NE	NE	NE	2,700	7,200	4,300	NE	NE
Typical MSW (Class III) Landfill Acceptance Criteria/Lined Cell, TTLC mg/kg (D)				ND	NE	10,000	1,000	500	500	10,000	75	2.4	56	5	5	8,000	2,500	1,000	20	3,500	2,000	100	500	700	2,400	5,000	8.8	36,000	2.7	170,000	5

Notes:

(A) 5035 Terra Core samples were acquired from approximate middle of bottom half of 1.5 ft. sampler.

(B) Depths from top flange of sample port pipe E1 7.72 ft., E2 8.72 ft. and E3 8.5 ft from Table 29b adjusted to depth below LTU surface grade July 2024 and assuming a 6 inch sample interval.

(B) California Code of Regulations Title 22 Limits of Hazardous Waste 22 CCR Section 66261.24

(C) HHRA Note 3 June 2022-Revised May 2022, Table 1. DTSC recommended Screening Levels for Soil Analytes

(D) Barstow Landfill Waste Acceptance Plan Criteria, Lined Cell Disposal

(E) California EPA/DTSC background levels of Arsenic in Southern California for near surface soils

color highlighted - Value detected above a trigger/screening value

mg/kg - milligram per kilogram

µg/kg - microgram per kilogram

mg/L - milligram per liter

ND - Not Detected

NE - Not Established

NA- Not Applicable

Table 1. Summary of Laboratory Test Results- Soil Samples (Contd...)

1,1-Dichloroethane ug/kg	1,1-Dichloroethene (1,1-Dichloroehtylene) ug/kg	1,1-Dichloropropene ug/kg	1,2,3-Trichlorobenzene ug/kg	1,2,3-Trichloropropane ug/kg	1,2,4-Trichlorobenzene ug/kg	1,2,4-Trimethylbenzene ug/kg	1,2-Dibromo-3-Chloropropane ug/kg	1,2-Dibromoethane ug/kg	1,2-Dichlorobenzene ug/kg	1,2-Dichloroethane ug/kg	1,2-Dichloropropane ug/kg	1,3,5-Trimethylbenzene ug/kg	1,3-Dichlorobenzene ug/kg	1,3-Dichloropropane ug/kg	1,4-Dichlorobenzene ug/kg	2,2-Dichloropropane ug/kg	2-Butanone (MEK) ug/kg	2-Chlorotoluene ug/kg	2-Hexanone ug/kg	4-Chlorotoluene ug/kg	4-Methyl-2-pentanone (MIBK) ug/kg	Acetone ug/kg	Benzene ug/kg	Bromobenzene ug/kg
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	14	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	30	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	27	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	23	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.3	ND	ND	ND	ND	54	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	19	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	9.9	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	35	ND	ND
ND	ND	ND	ND	ND	ND	0.37	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	14	11	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	19	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	29	170	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	14	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	14	ND	ND
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	14	NE	NE	NE	NE	NE	NE	NE	NE	10	NE	NE	NE	NE	150	NE	4,000	NE	NE	NE	NE	NE	10	NE
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	0.7	NE	NE	NE	NE	NE	NE	NE	NE	0.5	NE	NE	NE	NE	7.5	NE	200.0	NE	NE	NE	NE	NE	0.5	NE
16.0	NE	NE	NE	0.021	35	NE	0.057	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	1.4	NE
7,100	350	NE	300	21	260	NE	25	NE	NE	NE	NE	NE	NE	2,200	NE	NE	NE	2,500	NE	2,300	NE	NE	46	NE
16	1,000	NE	930	3.1	110	NE	0.094	0.16	9,300	2	4.4	1,500	NE	23,000	11	NE	190,000	NE	1,300	NE	140,000	670,000	5.1	1,800

VOCs (EPA 8260B)

Bromochloromethane ug/kg	Bromodichloromethane ug/kg	Bromoform ug/kg	Bromomethane ug/kg	Carbon disulfide ug/kg	Carbon tetrachloride ug/kg	Chlorobenzene ug/kg	Chloroethane ug/kg	Chloroform ug/kg	Chloromethane ug/kg	cis-1,2-Dichloroethene ug/kg	cis-1,3-Dichloropropene ug/kg	Dibromochloromethane ug/kg	Dibromomethane ug/kg	Dichlorodifluoromethane ug/kg	Isopropylbenzene ug/kg	m,p-Xylene ug/kg	Methylene Chloride ug/kg	Methyl-t-Butyl Ether (MTBE) ug/kg	n-Butylbenzene ug/kg	o-Xylene ug/kg	p-Isopropyltoluene ug/kg	sec-Butylbenzene ug/kg
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	1.3	ND	ND	ND	ND	ND	ND	ND	ND	3.3	0.55	ND	ND	0.45	0.26	ND	0.56
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	9.3	ND	ND	ND	ND	ND	ND	ND	ND	12	1.6	ND	ND	1.3	0.73	0.64	1.7
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	10	2,000	NE	120	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	0.5	100.0	NE	6.0	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	1.3	86	NE	NE	2.9	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	26	NE	NE	NE	NE	NE
NE	1,300	3,000	NE	NE	250	NE	NE	NE	NE	84	NE	NE	NE	NE	NE	NE	2,500	NE	18,000	NE	NE	12,000
630	37.6	86	30	3,500	2.9	1,300	57,000	37.6	460	23,000	23,000	39	99	370	NE	NE	1,000	210	58,000	2,800	NE	120,000

2400

Table 1. Summary of Laboratory Test Results- Soil Samples

															SM 4500 P E				EPA 9045C		SM 2540G
Styrene ug/kg	tert-Butylbenzene ug/kg	Tetrachloroethene (PCE) ug/kg	trans-1,2-Dichloroethene ug/kg	trans-1,3-Dichloropropene ug/kg	Trichloroethene (TCE) ug/kg	Trichlorofluoromethane ug/kg	Vinyl acetate ug/kg	Vinyl chloride ug/kg	Toluene (Methyl benzene) ug/kg	Ethylbenzene ug/kg	Xylene ug/kg	N-propylbenzene ug/kg	Napthalene ug/kg	Total Nitrogen (calculated) mg/L	Total Phosphorous mg/L	Potassium mg/L	Sulfate mg/L	Temperature	pH (pH unit)	Moisture Content wt%
																1890				7.41
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			900				3.99
																1360				5.87
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			818				5.61
																1910				8.11
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1500				4.62
																1470				6.65
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			481				4.05
																657				4.53
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			943				4.19
																738				3.19
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1260				5.97
																412				1.5
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1370				5.47
																1250				2.77
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1900				1.21
																2000				9.66
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1740				6.33
																1780				6.68
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1080				3.6
																2880				9.26
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1120				5.81
																1070				4.15
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			2230				7.1
																1760				9.54
ND	0.48	ND	ND	ND	ND	ND	ND	ND	0.96	2.5	0.81	0.95	15			1230				4.58
																1670				4.8
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			1600				6.16
																1400				3.92
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			842				2.96
																595				2.84
ND	1.2	ND	ND	ND	ND	ND	ND	ND	9.7	19	2.3	3	25	ND	563	1330	150	22.1	8.5	4.69
														ND	53.8	1220	82	22	8.3	4.17
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	61.3	1300	76	22	8.9	4.98
														ND	91.9	9220	250	22	7.8	21.5
														ND	566		94	23.1	8.5	7.51
														ND	657		120	23.2	8.6	8.29
														ND	655		81	23.1	8.8	7.09
														ND	603		55	23.1	8.9	8.6
														ND	549		22	22.9	9.4	7.57
														ND	600		55	22.8	8.8	8.87
														358	583		510	24.5	8.1	0.71
														387	524		500	24.4	8.1	0.62
NE	NE	NE	NE	NE	NE	NE	NE	2	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	14	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	0.7	NE	NE	NE	NE	NE	0.2	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	2.7	NE	NE	NE	NE	NE	0.15	NE	NE	NE	NE	6.5	NA	NA	NA	NA	NA	NA	NA
32,000	12,000	390	600	NE	NE	5,400	NE	370	5,300	NE	NE	NE	570	NA	NA	NA	NA	NA	NA	NA
35,000	120,000	100	NE	NE	6	350,000	3,800	1.7	47,000	141	2,500	NE	NE	NA	NA	NA	NA	NA	NA	NA

HUSHMAND ASSOCIATES, INC.
Geotechnical and Earthquake Engineers

Table 2. Summary of Laboratory Test Results - Groundwater Samples

Boring ID	Sample ID	Sample Collection Date	Sample Depth (ft below grade)	Biphenyl (µg/L)	Diphenyl Oxide (µg/L)	VOCs, (µg/L)							MBAS mg/L	Total Nitrogen (calculated) mg/L	Total Phosphorous mg/L	Potassium mg/L	Sulfate mg/L	pH
						Benzene	Toulene	Ethybenzene	Napthalene	N-Propylbenzene	Total Xylenes	2-Butanone (MEK)						
MW-200A	MW-200A GW-1	07/18/2024	32.70	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	11.2	0.0697	4.72	770	7.1
B-6	B-6 GW-1	07/18/2024	40-41.5	280	990	ND	8.3	ND	ND	ND	ND	ND	0.332	12.9	0.331	8.73	740	7.7
Maximum Contaminant Levels for Drinking Water (California) [A]				NE	NE	1	150	300	NE	NE	1,750	NE	NE	NE	NE	NE	NE	NE

Notes:

(A)Maximum Contaminant Levels (MCLs) for Inorganic, Volatile Organic and Non-Volatile Synthetic Chemicals 22 CCR &64444

bold - Value detected above a trigger/screening value

mg/kg - milligram per kilogram

mg/L - milligram per liter

µg/L - microgram per liter

ND - Not Detected

NE - Not Established

Table 3 Soil Gas and Ambient Air Samples (µg/m3) (Contd...)

Boring ID	Sample ID	Sample Collection Date	Sample Depth (ft below grade)	1,1,1-Trichloroethane	1,1,2,2-Tetrachloroethane	1,1,2-Trichloro-1,2,2-trifluoroethane	1,1,2-Trichloroethane	1,1-Dichloroethane	1,1-Dichloroethene	1,1-Difluoroethane	1,2,4-Trichlorobenzene	1,2,4-Trimethylbenzene	1,2-Dibromo-3-Chloropropane	1,2-Dibromoethane	1,2-Dichlorobenzene	1,2-Dichloroethane	1,2-Dichloropropane	1,3,5-Trimethylbenzene	1,3-Dichlorobenzene
B-2 (SG-1)	B-2 SG-1 @ 5'	07/18/2024	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	B-2 SG-1 @ 15'	07/18/2024	15.0	ND	ND	ND	ND	ND	ND	ND	No data	ND	ND	ND	ND	ND	ND	ND	ND
B-3 (SG-2)	B-3 SG-2 @ 10'	07/18/2024	10.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	B-3 SG-2 @ 20'	07/18/2024	20.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B-4 (SG-3)	B-4 SG-3 @ 5'	07/18/2024	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	B-4 SG-3 @ 15'	07/18/2024	15.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ambient-Air	Ambient Air A-1	07/18/2024	Ambient	ND	ND	0.5	ND	ND	ND	ND	No data	0.15	No data	No data	No data	ND	No data	ND	No data
Cancer Screening Level (DTSC/OEHHA [A])				NE	0.21	NE	NE	7.7	NE	NE	1.7	NE	NE	NE	NE	NE	NE	NE	NE
Non-Cancer Screening Level (DTSC/OEHHA [B])				4400	350	NE	NE	3500	310	NE	8.8	NE	NE	NE	NE	NE	NE	NE	NE

Notes:

Highlighted Value detected above a trigger/screening value without attenutaton factor applied/followed by Value with typical construction worker scenario attenuation factor of 10^{-3}.

[A] Office of Environmental Health Hazard Assessment (OEHHA) Commerical/Industrial Scenario's Soil-Gas-Screening Numbers --Cancer

[B] Office of Environmental Health Hazard Assessment (OEHHA) Commerical/Industrial Scenario's Soil-Gas-Screening Numbers--Non-Cancer

ND - Not Detected (below Reporting Limit)

NE - Not Established

Table 3 Soil Gas and Ambient Air Samples (µg/m3) (Contd...)

1,4-Dichlorobenzene	2-Butanone (MEK)	2-Hexanone	4-Ethyltoluene	4-Methyl-2-pentanone (MIBK)	Acetone	Benzene	Benzyl Chloride	Bromo dichloromethane	Bromoform	Bromomethane	Carbon disulfide	Carbon tetrachloride	Chlorobenzene	Chloroethane	Chloroform	Chloromethane	cis-1,2-Dichloroethene	cis-1,3-Dichloropropene	Dibromochloromethane	Dichlorodifluoromethane	Dichlorotetrafluoromethane	Ethylbenzene
ND	26	3	ND	ND	130	12/0.012	ND	21/0.021	ND	1.8	19	ND	ND	ND	59	1.2	ND	ND	4.7	2.6	ND	2.1
ND	17	ND	ND	ND	88	6.6/0.0066	ND	ND	ND	ND	5.3	ND	ND	ND	3.2	ND	ND	ND	ND	2.5	No data	1.3
ND	18	3.2	ND	ND	75	6.3/.0.0063	ND	2.8/0.0028	ND	ND	5	ND	ND	ND	7.5	ND	ND	ND	ND	2.5	ND	1.3
ND	ND	ND	ND	ND	12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.69	ND	ND	ND	2.6	ND	ND
ND	23	3.2	ND	2.8	140	310/0.31	ND	14/0.0014	ND	1.5	17	ND	8.6	ND	47	2.3	ND	ND	1.6	2.5	ND	23
ND	6.3	ND	ND	ND	30	5.2/0.0052	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.3
No data	No data	No data	ND	No data	No data	0.23	No data	ND	No data	No data	No data	0.43	ND	ND	0.49	No data	ND	No data	ND	1.4	No data	0.17
NE	NE	NE	NE	NE	NE	0.42	NE	0.33	11	NE	NE	2	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
NE	NE	NE	NE	NE	NE	13	NE	350	350	NE	NE	180	NE	NE	NE	NE	35	NE	NE	NE	NE	NE

Table 3 Soil Gas and Ambient Air Samples (µg/m3)

Hexachloro-1,3-butadiene	Isopropanol	m,p-Xylene	Methylene Cloride	Methyl-t-Butyl Ether (MTBE)	n-Butylbenzene	o-Xylene	sec-Butylbenzene	Styrene	tert-Butylbenzene	Tetrachloroethene	Toluene	trans-1,2-Dichloroethene	trans-1,3-Dichloropropene	Trichloroethene	Trichlorofluoromethane	Vinyl acetate	Vinyl chloride	Chloromethane	Methylene Chloride
ND	23	ND	12	ND	ND	ND	ND	ND	ND	1.6	26	ND	ND	ND	ND	ND	ND	No data	No data
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	11	ND	ND	ND	ND	ND	ND	No data	No data
ND	12	ND	13	ND	ND	0.89	ND	ND	ND	1.8	28	ND	ND	ND	ND	ND	ND	No data	No data
ND	ND	ND	8.5	ND	ND	ND	ND	ND	ND	ND	12	ND	ND	ND	ND	ND	ND	No data	No data
ND	ND	6.5	3.5	ND	ND	2.4	ND	ND	ND	7.7/0.0077	41	ND	ND	ND	ND	ND	ND	No data	No data
ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	4.8	ND	ND	ND	ND	ND	ND	No data	No data
ND	No data	0.48	No data	ND	No data	0.16	No data	No data	No data	ND	1.2	ND	No data	ND	1.2	No data	ND	0.41	21
NE	NE	NE	12	NE	NE	NE	NE	NE	NE	2	NE	NE	NE	NE	NE	NE	0.16	NE	12
NE	NE	NE	1800	NE	880	NE	1800	3900	1800	180	1300	350	NE	NE	5300	NE	440	NE	1800

HUSHMAND ASSOCIATES, INC.
Geotechnical and Earthquake Engineers

ATTACHMENT C

COPY OF BATCH CANISTER CERTIFICATION

eurofins | Environment Testing Calscience

570-191327 Chain of Custody

570-191327 COC

BATCH CANISTER QC CERTIFICATION

Canister Size ☐ 6L ☑ 1L

Certified Canister IDs.

	(Certified Canister)	
LC154		LC035
LC728		LC1176
LC746		LC911
LC823		LC507
SLC034		LC1241
LC821		LC761

Certification Method ☑ TO-15 ☐ TO-15 SIM

Date Cleaned 7/9/2024

Leak Check Start 7/10/2024 (Date) 11:00:00 AM (Time)

Leak Check End 7/11/2024 (Date) 11:00:00 AM (Time)

Date Certified 7/12/2024

TALS Job # 570-191327

Gauge ID AIR MG3

Cleaning Equipment ID
☐ Oven 1 ☐ Oven 4
☐ Oven 2 ☐ Oven 7
☑ Oven 3 ☐ Oven 8

Canisters were cleaned as a batch per Eurofins Calscience SOP 51219 (T-016). This certifies that the canisters referenced herein passed the leak test per EPA TO-15, § 8.4.1.2, and the certified canister contains no target analytes above the reporting limits stated in the applicable SOP and/or any client-specified target list of analytes.
Note: Canisters may be sent out with a < 24-hr leak test on approval from the client.

Employee PUID I2GR Date 7/15/2024

eurofins | Environment Testing Calscience

570-191332 Chain of Custody 570-191332 COC

BATCH CANISTER QC CERTIFICATION

Canister Size ☐ 6L ☑ 1L

Certified Canister IDs.

	(Certified Canister)	
LC666		LC234
LC689		LC367
LC1008		LC1214
LC866		LC764
LC717		LC172
LC1327		LC526

Certification Method ☑ TO-15 ☐ TO-15 SIM

Date Cleaned 7/9/2024

Leak Check Start 7/10/2024 (Date) 11:00:00 AM (Time)

Leak Check End 7/11/2024 (Date) 11:00:00 AM (Time)

Date Certified. 7/12/2024

TALS Job # 570-191332

Gauge ID AIR MG3

Cleaning Equipment ID ☐ Oven 1 ☑ Oven 4 ☐ Oven 2 ☐ Oven 7 ☐ Oven 3 ☐ Oven 8

Canisters were cleaned as a batch per Eurofins Calscience SOP 51219 (T-016). This certifies that the canisters referenced herein passed the leak test per EPA TO-15 § 8.4.1.2, and the certified canister contains no target analytes above the reporting limits stated in the applicable SOP and/or any client-specified target list of analytes.
Note: Canisters may be sent out with a < 24-hr leak test on approval from the client.

Employee PUID I2GR Date 7/15/2024

SOIL VAPOR SAMPLING DATA SHEET

A. GENERAL INFORMATION

SITE: Mojave Solar Project SAMPLING DATE: 7/18/24

WELL ID: B-2 / SG2 SHIPPING DATE:

SAMPLER: MT

Purge Flow (mL/min): 200

One System Purge Volume (mL):
(Tubing, Sand Pack, Dry Bentonite Volumes) 7262 mL

Purge Volume Required before Sampling (mL): 7262 mL

Purge Volume Removed (mL): 7500 mL

Sand Pack Height (inches): 12 Dry Bentonite Height (inches): 8

Sand Pack Diameter(inches): 8 Dry Bentonite Diameter(inches): 8

Tubing Length (feet): 5 Tubing Diameter (inches): 1/4

** Assumes 40% Sand Porosity and 50% Bentonite Porosity*

B. SAMPLE PURGE INFORMATION

Collect Sample with Summa Canister. Ensure the pressure in the canisters is over -26 in.Hg when starting. Stop sample collection with -5 in. HG in Summa Canisiter.

Notes: orifice = SGM191A start purge @ 1107 end purge @ 1144

REGULAR SAMPLE

SAMPLE ID: B-2 SG-1 @ 5'

VACUUM TEST (PASS/FAIL,VACUUM): pass

Field Analysis		
multi-gas	GEM2000 - O2 (%)	20.9
	GEM2000 - CO2 (%)	0
	GEM2000 - CH4 (%)	0
	PID - Total VOCs (ppmv)	0

CANISTER SERIAL NO.: LC717 FLOW RATE (L/min): 0.1

SAMPLE TIME: START: 1145 END: 1155

CANISTER PRESSURE: INITIAL: -30 FINAL: -5

Helium Concentration Maintained : >10%

Helium Bag Reading : 0 ppm

LABORATORY: Eurofins

DUPLICATE SAMPLE

SAMPLE ID:

VACUUM TEST (PASS/FAIL, VACUUM):

Field Analysis	
	GEM2000 - O2 (%)
	GEM2000 - CO2 (%)
	GEM2000 - CH4 (%)
	PID - Total VOCs (ppmv)

CANISTER SERIAL NO.: FLOW RATE (L/min):

SAMPLE TIME: START: END:

CANISTER PRESSURE: INITIAL: FINAL:

Helium Concentration Maintained :

Helium Bag Reading :

LABORATORY:

SAMPLER SIGNATURE

Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112 (800) 545-7558

SOIL VAPOR SAMPLING DATA SHEET

A. GENERAL INFORMATION

SITE: Mojave Solar Project SAMPLING DATE: 7/15/24

WELL ID: B-2 SG1 SHIPPING DATE:

SAMPLER: MT

Purge Flow (mL/min): 200

One System Purge Volume (mL):
(Tubing, Sand Pack, Dry Bentonite Volumes) 7306 mL

Purge Volume Required before Sampling (mL): 7306 mL

Purge Volume Removed (mL): 7500 mL

Sand Pack Height (inches): 12 Dry Bentonite Height (inches): 8

Sand Pack Diameter(inches): 8 Dry Bentonite Diameter(inches): 8

Tubing Length (feet): 15 Tubing Diameter (inches): 1/4

** Assumes 40% Sand Porosity and 50% Bentonite Porosity*

B. SAMPLE PURGE INFORMATION

Collect Sample with Summa Canister. Ensure the pressure in the canisters is over -25 in.Hg when starting. Stop sample collection with -5 in. HG in Summa Canisiter.

Notes: orifice = SGM134A start purge @ 1017
end purge @ 1054

REGULAR SAMPLE		DUPLICATE SAMPLE	
SAMPLE ID: B-2 SG-1 @ 15'		SAMPLE ID:	
VACUUM TEST (PASS/FAIL,VACUUM): PASS		VACUUM TEST (PASS/FAIL, VACUUM):	
Field Analysis (multi RAE)	GEM2000 - O2 (%): 20.9	Field Analysis	GEM2000 - O2 (%):
	GEM2000 - CO2 (%): 0		GEM2000 - CO2 (%):
	GEM2000 - CH4 (%): 0		GEM2000 - CH4 (%):
	PID - Total VOCs (ppmv): 0		PID - Total VOCs (ppmv):
CANISTER SERIAL NO.: LC 154 FLOW RATE (L/min): 0.1		CANISTER SERIAL NO.: FLOW RATE (L/min):	
SAMPLE TIME: START: 1055 END: 1105		SAMPLE TIME: START: END:	
CANISTER PRESSURE: INITIAL: -30 FINAL: -5		CANISTER PRESSURE: INITIAL: FINAL:	
Helium Concentration Maintained : >10 %		Helium Concentration Maintained :	
Helium Bag Reading : 0 ppm (SGM134A)		Helium Bag Reading :	
LABORATORY: Eurofins		LABORATORY:	

SAMPLER SIGNATURE

Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112 (800) 545-7558

SOIL VAPOR SAMPLING DATA SHEET

Sheet 1 of 1

A. GENERAL INFORMATION

SITE: Mojave Solar Project SAMPLING DATE: 7/18/24

WELL ID: B-3 / SG-2 SHIPPING DATE:

SAMPLER: NT

Purge Flow (mL/min): 200

One System Purge Volume (mL):
(Tubing, Sand Pack, Dry Bentonite Volumes) 7284 mL

Purge Volume Required before Sampling (mL): 7284 mL

Purge Volume Removed (mL): 7500 mL

Sand Pack Height (Inches): 12 Dry Bentonite Height (inches): 8

Sand Pack Diameter(inches): 8 Dry Bentonite Diameter(inches): 8

Tubing Length (feet): 10 Tubing Diameter (inches): 1/4

** Assumes 40% Sand Porosity and 50% Bentonite Porosity*

B. SAMPLE PURGE INFORMATION

Collect Sample with Summa Canister. Ensure the pressure in the canisters is over -26 In.Hg when starting. Stop sample collection with -5 in. HG in Summa Canisiter.

Notes: orifice = SGM023A start purge @ 1249
end purge @ 1326

REGULAR SAMPLE			DUPLICATE SAMPLE		
SAMPLE ID: B-3 SG-2 @ 10'			SAMPLE ID:		
VACUUM TEST (PASS/FAIL,VACUUM): PASS			VACUUM TEST (PASS/FAIL, VACUUM):		
Field Analysis (multi-gas)	~~GEM2000~~ - O2 (%)	20.9	Field Analysis	GEM2000 - O2 (%)	
	~~GEM2000~~ - CO2 (%)	0		GEM2000 - CO2 (%)	
	~~GEM2000~~ - CH4 (%) (PID)	0		GEM2000 - CH4 (%)	
	PID - Total VOCs (ppmv)	0		PID - Total VOCs (ppmv)	
CANISTER SERIAL NO.: LC1327	FLOW RATE (L/min): 0.1		CANISTER SERIAL NO.:	FLOW RATE (L/min):	
SAMPLE TIME: START: 1327	END: 1337		SAMPLE TIME: START:	END:	
CANISTER PRESSURE: INITIAL: -29	FINAL: -5		CANISTER PRESSURE: INITIAL:	FINAL:	
Helium Concentration Maintained : 2.10 %			Helium Concentration Maintained :		
Helium Bag Reading : 0 ppm			Helium Bag Reading :		
LABORATORY: Eurofins			LABORATORY:		

SAMPLER SIGNATURE

SOIL VAPOR SAMPLING DATA SHEET

Sheet 1 of 1

A. GENERAL INFORMATION

SITE: Mojave Solar Project SAMPLING DATE: 7/18/24

WELL ID: B-3 / SG2 SHIPPING DATE:

SAMPLER: NT

Purge Flow (mL/min): 200

One System Purge Volume (mL):
(Tubing, Sand Pack, Dry Bentonite Volumes) 7329 mL

Purge Volume Required before Sampling (mL): 7329 mL

Purge Volume Removed (mL): 7500 mL

Sand Pack Height (inches): 12 Dry Bentonite Height (inches): 6

Sand Pack Diameter(inches): 8 Dry Bentonite Diameter(inches): 8

Tubing Length (feet): 20 Tubing Diameter (inches): 1/4

** Assumes 40% Sand Porosity and 50% Bentonite Porosity*

B. SAMPLE PURGE INFORMATION

Collect Sample with Summa Canister. Ensure the pressure in the canisters is over -26 in.Hg when starting. Stop sample collection with -5 In. HG in Summa Canisiter.

Notes: orifice = SGM147A start purge @ 1159
end purge @ 1236

REGULAR SAMPLE			DUPLICATE SAMPLE		
SAMPLE ID: B-3 SG-2 @ 20'			SAMPLE ID:		
VACUUM TEST (PASS/FAIL,VACUUM): Pass			VACUUM TEST (PASS/FAIL, VACUUM):		
Field Analysis (multi RAE)	GEM2000 - O2 (%)	20.9	Field Analysis	GEM2000 - O2 (%)	
	GEM2000 - CO2 (%)	0		GEM2000 - CO2 (%)	
	GEM2000 - ~~CH4~~ CH4 (%)	0		GEM2000 - CH4 (%)	
	PID - Total VOCs (ppmv)	0		PID - Total VOCs (ppmv)	
CANISTER SERIAL NO.: 4367		FLOW RATE (L/min): 10.1	CANISTER SERIAL NO.:		FLOW RATE (L/min):
SAMPLE TIME: START: 1237		END: 1247	SAMPLE TIME: START:		END:
CANISTER PRESSURE: INITIAL: -28		FINAL: -5	CANISTER PRESSURE: INITIAL:		FINAL:
Helium Concentration Maintained : >10 %			Helium Concentration Maintained :		
Helium Bag Reading : 0 ppm			Helium Bag Reading :		
LABORATORY: Eurofins			LABORATORY:		

SAMPLER SIGNATURE

SOIL VAPOR SAMPLING DATA SHEET

Sheet 1 of 1

A. GENERAL INFORMATION

SITE: Mojave Solar Project SAMPLING DATE: 7/18/24

WELL ID: B-4 / SG3 SHIPPING DATE: _____

SAMPLER: NT

Purge Flow (mL/min): 200

One System Purge Volume (mL):
(Tubing, Sand Pack, Dry Bentonite Volumes) 7262 mL

Purge Volume Required before Sampling (mL): 7262 mL

Purge Volume Removed (mL): 7500 mL

Sand Pack Height (inches): 12 Dry Bentonite Height (inches): 8

Sand Pack Diameter(inches): 8 Dry Bentonite Diameter(inches): 8

Tubing Length (feet): 5 Tubing Diameter (inches): 1/4

**Assumes 40% Sand Porosity and 50% Bentonite Porosity*

B. SAMPLE PURGE INFORMATION

Collect Sample with Summa Canister. Ensure the pressure in the canisters is over -26 in.Hg when starting. Stop sample collection with -5 in. HG in Summa Canisiter.

Notes: orifice = SGM1ESA start purge @ 1410
end purge @ 1447

REGULAR SAMPLE			DUPLICATE SAMPLE		
SAMPLE ID: B-4 SG-3 @ 5'			SAMPLE ID:		
VACUUM TEST (PASS/FAIL,VACUUM): Pass			VACUUM TEST (PASS/FAIL, VACUUM):		
Field Analysis (multi-RAE)	GEM2000 - O2 (%)	20.9	Field Analysis	GEM2000 - O2 (%)	
	GEM2000 - CO2 (%)	0		GEM2000 - CO2 (%)	
	GEM2000 - ~~CH4~~ CH4 (%)	0		GEM2000 - CH4 (%)	
	PID - Total VOCs (ppmv)	0		PID - Total VOCs (ppmv)	
CANISTER SERIAL NO.: 4666	FLOW RATE (L/min): 0.1		CANISTER SERIAL NO.:	FLOW RATE (L/min):	
SAMPLE TIME: START: 1448	END: 1458		SAMPLE TIME: START:	END:	
CANISTER PRESSURE: INITIAL: -29	FINAL: -5		CANISTER PRESSURE: INITIAL:	FINAL:	
Helium Concentration Maintained : >10%			Helium Concentration Maintained :		
Helium Bag Reading : 0 ppm			Helium Bag Reading :		
LABORATORY: Eurofins			LABORATORY:		

SAMPLER SIGNATURE

SOIL VAPOR SAMPLING DATA SHEET

A. GENERAL INFORMATION

SITE: Mojave Solar Project SAMPLING DATE: 7/18/24

WELL ID: B-4 / SG3 SHIPPING DATE: _____

SAMPLER: NT

Purge Flow (mL/min): 200

One System Purge Volume (mL): (Tubing, Sand Pack, Dry Bentonite Volumes) 7306 mL

Purge Volume Required before Sampling (mL): 7306 mL

Purge Volume Removed (mL): 7500 mL

Sand Pack Height (inches): 12 Dry Bentonite Height (inches): 8

Sand Pack Diameter(inches): 8 Dry Bentonite Diameter(inches): 8

Tubing Length (feet): 15 Tubing Diameter (inches): 1/4

**Assumes 40% Sand Porosity and 50% Bentonite Porosity*

B. SAMPLE PURGE INFORMATION

Collect Sample with Summa Canister. Ensure the pressure in the canisters is over -26 in.Hg when starting. Stop sample collection with -5 in. HG in Summa Canisiter.

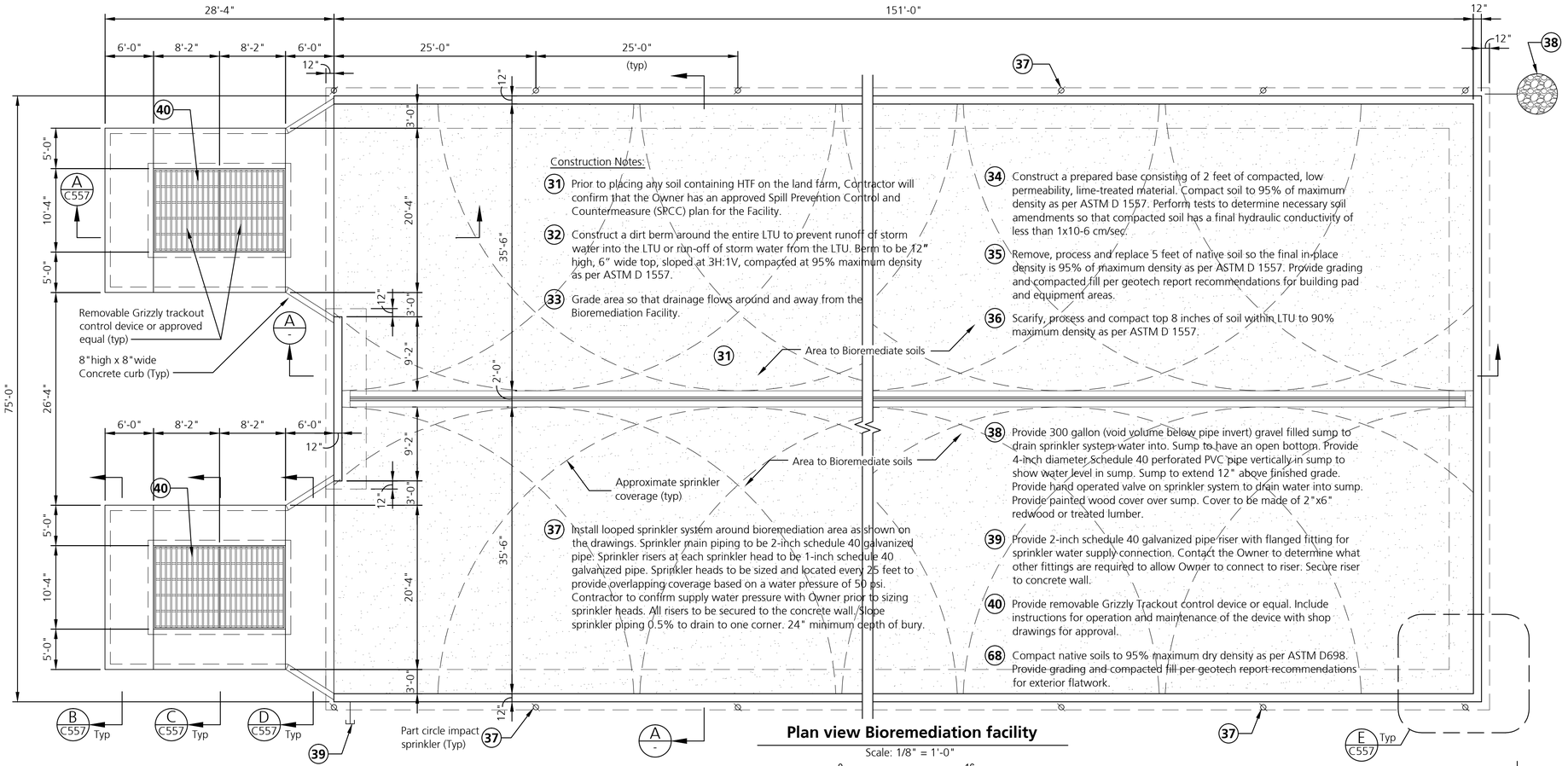
Notes: orifice = SGM153A start purge @ 1330 end purge @ 1407

REGULAR SAMPLE			DUPLICATE SAMPLE		
SAMPLE ID: B-4 SG-3 @ 15'			SAMPLE ID:		
VACUUM TEST (PASS/FAIL,VACUUM): PASS			VACUUM TEST (PASS/FAIL, VACUUM):		
Field Analysis (multi-RAE)	GEM2000 - O2 (%)	20.9	Field Analysis	GEM2000 - O2 (%)	
	GEM2000 - CO2 (%)	0		GEM2000 - CO2 (%)	
	GEM2000 - CH4 (%) 875	0		GEM2000 - CH4 (%)	
	PID - Total VOCs (ppmv)	0		PID - Total VOCs (ppmv)	
CANISTER SERIAL NO.: LC948	FLOW RATE (L/min): 0.1		CANISTER SERIAL NO.:	FLOW RATE (L/min):	
SAMPLE TIME: START: 1408	END: 1418		SAMPLE TIME: START:	END:	
CANISTER PRESSURE: INITIAL: -28	FINAL: -5		CANISTER PRESSURE: INITIAL:	FINAL:	
Helium Concentration Maintained : 10%			Helium Concentration Maintained :		
Helium Bag Reading : 10 cm			Helium Bag Reading :		
LABORATORY: Enthalpy			LABORATORY:		

SAMPLER SIGNATURE

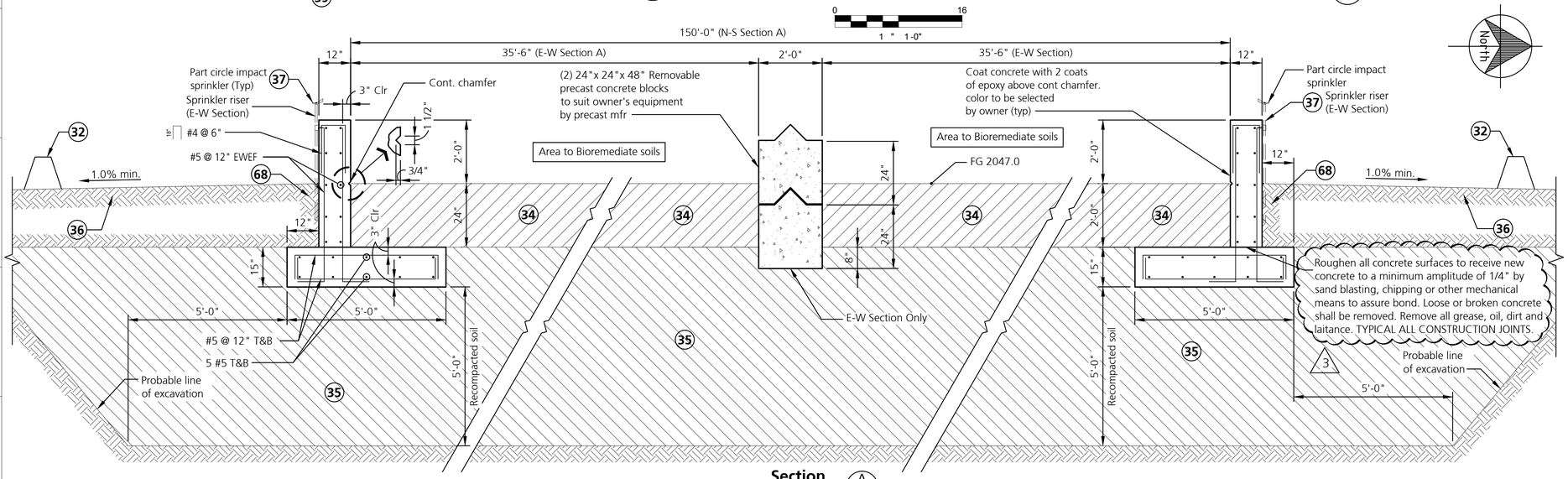
ATTACHMENT D

ALPHA LTU DRAWINGS



Plan view Bioremediation facility

Scale: 1/8" = 1'-0"



Section

1/2"=1'-0"

General Structural Notes:

These notes apply except where specifically noted otherwise on the drawings.

Code:

1. Comply with the 2010 California Building Code

Design Loads:

1. Dead load + weight of a 8,000 lt
2. Seismic design parameters:
   a. Site class D
   b. S(ds) = 0.808
   c. S(d1) = 0.465
   d. Seismic design category D
   e. Importance factor, I(e) = 1

Bureau Veritas North America
Plan review approval of documents does not authorize construction to proceed in violation of any federal state, nor local regulation, whether shown or not.

General:

1. The structural drawings show the completed project. They do not include components that are needed for construction safety. The Contractor is responsible for safety in and around the job site during construction.
2. Structures have been designed for operational loads on the completed structures. The Contractor shall provide all necessary temporary bracing, shoring, guying or other means to avoid excessive stresses and to hold structural elements in place during construction.
3. Verify all dimensions of equipment, piping, etc. prior to starting work. Notify the engineer of any discrepancies or inconsistencies.
4. Any engineering design provided by others and submitted for review shall bear the seal and signature of an insured structural or civil engineer registered in California.
5. The cost of design work resulting from errors or omissions in construction shall be borne by the Contractor.
6. In case of conflicts, more costly requirements govern for bidding. Submit clarification request prior to proceeding with work.

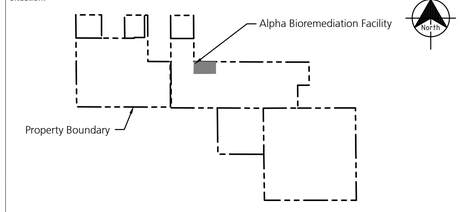
The 4 digit sheet # shown on reference sheets, match lines, construction callouts and sections is the shortened form of the 18 digit plan #.

811 Dig Alert
Dial toll free
1-800-227-2600
At least two days before you dig

REGISTERED PROFESSIONAL ENGINEER
STEWART S. VAGHTI
C 65036
EXP. 6-30-13
CIVIL
STATE OF CALIFORNIA

Rev.	Date	Description	Drawn By	Checked By	Passed By
3	03/21/2013	Note added - For Permitting	EH	AOB	SSV
2	05/01/2012	For Permitting	EH	AOB	SSV
1	03/01/2012	For Permitting	EH	AOB	SSV
0	12/19/2011	For Review (not for construction)	EH	AOB	SSV

Situation:



MOJAVE SOLAR LLC

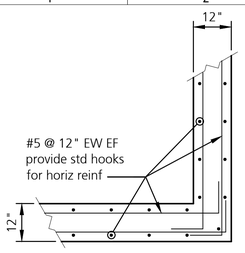
MOJAVE SOLAR PROJECT

Gannett Fleming
4722 N. 24th Street, Suite 250 Phoenix, AZ 85016-4832
Phone (602) 553-8817 Fax (602) 553-8816 Web www.gfnet.com

ABENER TEYMA MOJAVE

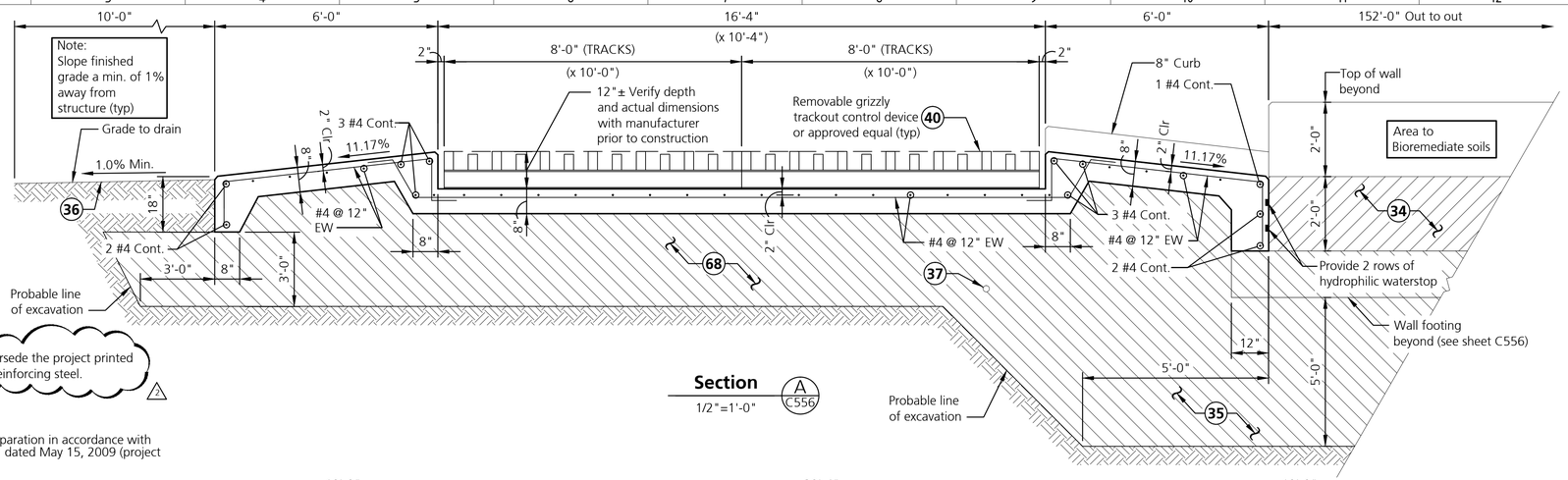
Scale: As Noted	Urban Development and Buildings Evaporation Ponds/Bioremediation Facilities - Alpha Site Bioremediation Facilities Plan	Plan No: 6007-PLN-GFG-00-50-C556 Sheets: 16 Sheet No: 8 Plan No. int:

File: K:\53790 Mojave Solar Power Plant\Project Working Files\CADD\Civil\6007-PLN-GFG-00-50-C556.dwg
Plotted: 3/21/13 at 3:10pm By: tkeane



Plan view

Section E C556
1/2"=1'-0"



Section A C556
1/2"=1'-0"

Note: The following specifications supersede the project printed specifications for concrete and reinforcing steel. 7

Foundations:

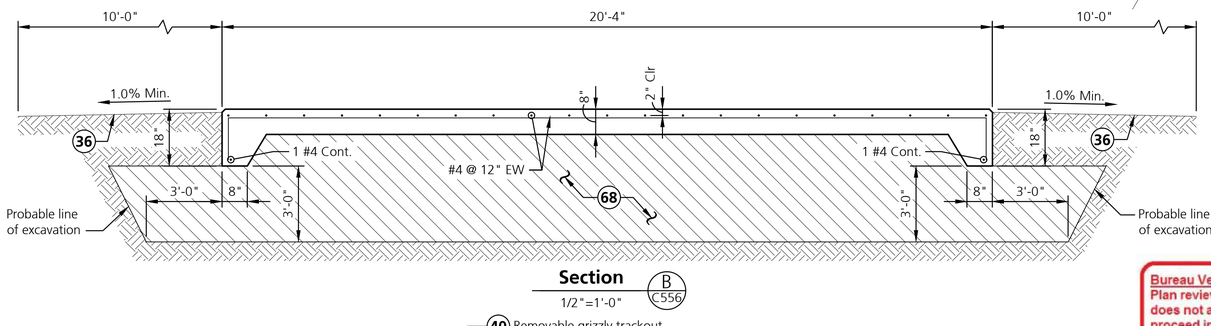
1. Perform all work including site preparation in accordance with the soils report by Ninyo & Moore dated May 15, 2009 (project no. 105879004).
2. Foundation design is based on an allowable bearing capacity of 2,000 psf on compacted fill.
3. Place foundation concrete only on subgrade prepared in strict conformance with the soils report (overexcavation and non-expansive fill material). Consult geotechnical engineer for the level of compaction of fill. Verify the suitability of the bearing material with the soils consultant before placing foundations.

Concrete:

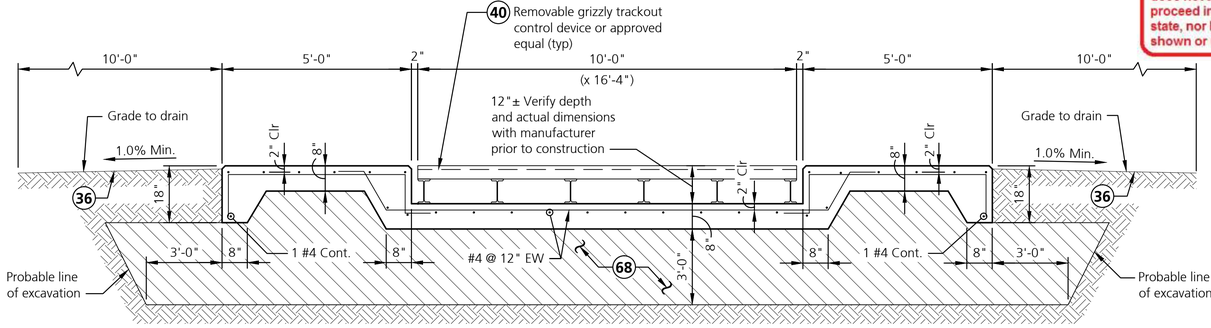
1. Concrete quality shall conform to the latest editions of ACI 117, ACI 315, ACI 301 and ACI 318. Finishes shall conform to ACI 301, paragraph 10.4. Surfaces not exposed to public view: rough form surfaces.
2. Concrete shall be regular weight (144 pcf) unless noted otherwise. cement shall be type II and shall conform to ASTM C150. Aggregate shall conform to ASTM C33. Water shall be potable. All concrete shall have a minimum 28 day compressive strength of 4500 psi. with max W/CM = 0.45
3. Submit mix designs for review before placement of concrete.
4. Maximum aggregate size shall not exceed 1".
5. Slump of concrete shall not exceed 4" +/-1". Slump shall be taken at job site prior to adding superplasticizer, if any.
6. Fly ash may be used and shall conform to the following: ASTM C618, type F; ratio (by weight) of fly ash to total of fly ash and cement is no more than 25 percent.
7. Provide 3/4" x 3/4" chamfers at all exposed corners of pads and walls.
8. Mechanically vibrate all concrete.
9. Curing: conform to ACI 318.
   a. All slabs and cast-in-place finished concrete: provide membrane curing compound. Apply curing compound immediately upon the completion of finishing work. Once the concrete is set enough to walk on without harming the finish, apply a second heavy coat of curing compound using a high pressure airless sprayer.
   b. All curing compound shall have a fugitive die. All curing compound shall meet the moisture retention requirements of ASTM C-309, type 1-d at coverage rate specified, and pass voc requirements. All curing compounds shall be compatible with future toppings, paint, waterproofing and finishes. Clean all nozzles after each use.
10. Do not cast walls or grade beams in lengths over 40'-0".
11. Location of all construction joints shall be as shown on the drawings or approved by the engineer.
12. Wait 24 hours between adjacent concrete castings.

Reinforcing Steel:

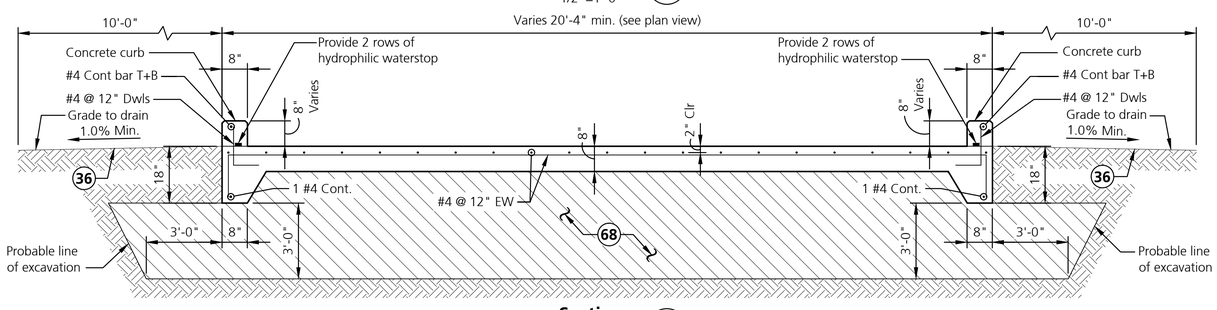
1. All reinforcing steel shall conform to ASTM A 615, grade 60. All reinforcing bars shall be deformed.
2. Concrete coverage for reinforcing bars (to face of bar) unless noted otherwise on drawings.
3. All reinforcement steel shall be lapped at a minimum of 60 bar dia. Terminate all reinforcement with standard hook unless noted otherwise.
4. Reinforcing spacing is maximum on center. All reinforcing is to be continuous unless otherwise noted.
5. Submit placing drawings per ACI detailing manual, ACI SP-66. Fabricate reinforcing steel after architect's review. Include elevations showing reinforcing at all concrete and masonry walls, and at all foundations.
6. Cover: All bars 2" clear unless noted otherwise.



Section B C556
1/2"=1'-0"



Section C C556
1/2"=1'-0"



Section D C556
1/2"=1'-0"

Construction Notes:

34 Construct a prepared base consisting of 2 feet of compacted, low permeability, lime-treated material. Compact soil to 95% of maximum density as per ASTM D 1557. Perform tests to determine necessary soil amendments so that compacted soil has a final hydraulic conductivity of less than 1x10-6 cm/sec.

35 Remove, process and replace 5 feet of native soil so the final in-place density is 95% of maximum density as per ASTM D 1557. Provide grading and compacted fill per geotech report recommendations for building pad and equipment areas.

36 Scarify, process and compact top 8 inches of soil within LTU to 90% maximum density as per ASTM D 1557.

37 Install looped sprinkler system around bioremediation area as shown on the drawings. Sprinkler main piping to be 2-inch schedule 40 galvanized pipe. Sprinkler risers at each sprinkler head to be 1-inch schedule 40 galvanized pipe. Sprinkler heads to be sized and located every 25 feet to provide overlapping coverage based on a water pressure of 50 psi. Contractor to confirm supply water pressure with Owner prior to sizing sprinkler heads. All risers to be secured to the concrete wall. Slope sprinkler piping 0.5% to drain to one corner. 24" minimum depth of bury.

40 Provide removable Grizzly Trackout control device or equal. Include instructions for operation and maintenance of the device with shop drawings for approval.

68 Compact native soils to 95% maximum dry density as per ASTM D698. Provide grading and compacted fill per geotech report recommendations for exterior flatwork.

The 4 digit sheet # shown on reference sheets, match lines, construction callouts and sections is the shortened form of the 18 digit plan #.

Bureau Veritas North America
Plan review approval of documents does not authorize construction to proceed in violation of any federal state, nor local regulation, whether shown or not.

811 **Dig Alert**
Dial toll free
1-800-227-2600
At least two days before you dig

REGISTERED PROFESSIONAL ENGINEER STEWART S. VAGHTI C 65036 EXP. 6-30-13 CIVIL STATE OF CALIFORNIA

Rev.	Date	Description	Drawn By	Checked By	Passed By
2	05/01/2012	For Permitting	EH	AOB	SSV
1	03/01/2012	For Permitting	EH	AOB	SSV
0	12/19/2011	For Review (not for construction)	EH	AOB	SSV

Situation:

MOJAVE SOLAR LLC | **MOJAVE SOLAR PROJECT**

Gannett Fleming
4722 N. 24th Street, Suite 250 Phoenix, AZ 85016-4852
Phone (602) 553-8817 Fax (602) 553-8816 Web www.gfnet.com

ABENER TEYMA MOJAVE

Scale:		Plan No:
As Noted	Urban Development and Buildings Evaporation Ponds/Bioremediation Facilities - Alpha Site Bioremediation Facilities Sections and Details	6007-PLN-GFG-00-50-C557 Sheets: 16 Sheet No: 9 Plan No. int:

File: K:\53790 Mojave Solar Power Plant\Project Working Files\CADD\Civil\6007--PLN-GFG-00-50-C557.dwg
Plotted: 5/1/12 at 2:39pm By: ehynick

ATTACHMENT E

TABLE 29b FROM 2024 ANNUAL DMP REPORT

Draft Table 29b - Soil Analytical Results - Alpha Land Treatment Unit

Sample Identification*	Date	Sample Depth (feet)	1,1-biphenyl (mg/kg)	1,1-oxybisbenzene (mg/kg)
E1	2/21/2018	7.2	ND	ND F1
	2/25/2022	7.3	ND	ND
	2/15/2024	7.72	ND	ND
	3/5/2025	8.97	ND	ND
E2	2/21/2018	7	**6,100**	**16,000**
	4/10/2018	8	**28**	**76**
	4/10/2018	9	**1.5 J**	**6**
	4/23/2018	10	ND	**1.3 J**
	2/25/2022	10	1,900	**11,000**
	2/15/2024	8.72	11	**160**
	3/5/2025	9.17	ND	**8**
E3	2/21/2018	7.1	**8,500**	**6,400 J**
	4/10/2018	8.1	**13**	**90**
	4/10/2018	9.1	ND	**6**
	4/23/2018	10.1	ND	**3.1 J**
	2/25/2022	9.6	**5,900**	**3,000**
	2/15/2024	8.5	ND	**2,500**
	3/5/2025	7.9	ND	ND
W1	2/21/2018	no sample collected (no soil)		
	2/25/2022	7.3	ND	ND
	2/15/2024	7.35	ND	ND
	3/5/2025	7.6	ND	ND
W2	2/21/2018	no sample collected (no soil)		
	2/25/2022	7.3	ND	ND
	2/15/2024	7.4	ND	ND
	3/5/2025	7.71	ND	ND
W3	2/21/2018	no sample collected (no soil)		
	2/25/2022	7	ND	ND
	2/15/2024	7.25	ND	ND
	3/5/2025	7.5	ND	ND

Notes:
Sample nomenclature from Mojave Solar LLC
Prior to 2/21/18, soil was not present in Alpha LTU during sampling events
F1 = MS and/or MSD Recovery is outside acceptance limits
J = Results is less than the RL but greater than or equal to the MDL and the concentration is an approximate value
ND = analyte not detected at or above the laboratory reporting limit
na = not analyzed
units in milligrams/kilogram
1,1-oxybisbenzene = diphenyl oxide (as listed on the laboratory analyses report)
Results detected above the laboratory reporting limit are bold
* = LTU samples collected and listed in the laboratory analyses report have the LTU area and sample depth included in the sample identification

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: **09-AFC-5C**
Condition Number: **COMP 10**
Description: **Notice of Violation of General Order (GO) 167-B, Maintenance Standard (MS) 9 and Operating Standard (OS) 12.**
Submittal Number: **COMP10-11-00**

September 22, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov

Submitted electronically via email

Ms. Gutierrez,

Pursuant to Condition of Compliance 10, this letter serves as formal notification to the California Energy Commission regarding a Notice of Violation (NOV) issued to the Mojave Solar Project (MSP) by the California Public Utilities Commission (CPUC).

The NOV, dated September 12, 2025, cites findings from a CPUC Electric Safety and Reliability Branch (ESRB) investigation into a fire incident that occurred on March 14, 2024 in the Alpha East solar field at loop 167E. Based on the investigation, ESRB determined that the Mojave Solar Project is in violation of General Order (GO) 167-B, specifically Maintenance Standard 9 and Operating Standard 12. In response, ESRB requested MSP to electronically submit a copy of all corrective actions and preventative measures, including procedural changes completed by MSP to remedy and prevent the recurrence of such violations.

MSP will submit the requested response by September 26, 2025, and will provide a subsequent update to your office.

Please advise if further information is required.

Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347

Phone: 760 308 0400

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

Attachment: NOV_GE20240315-01_Mojave Solar Project

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 12, 2025 GE20240315-01

Davis Rosas
Plant Manager
Mojave Solar Project – Mojave Solar LLC
42134 Harper Lake Road
Hinkley, CA 92347

SUBJECT: Notice of Violation (NOV)

Dear Davis Rosas:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Evan Coughran of ESRB staff investigated a fire incident that occurred on March 14, 2024. The fire originated in the Alpha East solar field at loop 167E, where Heat Transfer Fluid ignited following a failure of a rotary swivel joint. Mojave Solar Project, with assistance from Atlantica Sustainable Infrastructure (ASI), conducted a root cause analysis (RCA) and determined that the swivel joint had been installed incorrectly the previous day, leading to the joint's failure during operation.

ESRB's investigation finds Mojave Solar Project in violation of General Order (GO) 167-B, Maintenance Standard (MS) 9 and Operating Standard (OS) 12.

This letter serves as a notification to you that ESRB's investigation identified the following violations:

Violation-1

GO 167-B, Appendix D, MS 9: Conduct of Maintenance states:

> *"Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation."*

GO 167-B, Appendix E, OS 12: Operations Conduct states:

> *"To ensure safety, and optimize plant availability, the GAO conducts operations systematically, professionally, and in accordance with approved policies and procedures. The GAO takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow plant and operation procedures and instructions while taking responsibility for safety. Among other things:*
> *A. All personnel follow approved policies and procedures. Procedures are current, and include a course of action.*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

B. All operations are performed in a professional manner. Basic rules of conduct apply throughout the plant at all times.
C. All personnel on-duty are trained, qualified, and capable of performing their job functions. Personnel are assigned only to duties for which they are properly trained and qualified.
D. Personnel take immediate actions to prevent or correct unsafe situations."

At time of the incident, Procedure code SP-O&M-MJV-060 for the swivel joint replacement lacked critical information and quality assurance steps. Mojave Solar failed to provide staff with adequate swivel joint replacement procedures. As a result, staff were not provided with sufficient guidance, and the swivel joint was installed in reverse orientation. This improper installation directly caused the equipment failure and the resulting incident.

Therefore, ESRB finds Mojave Solar Project is in violation of GO 167-B, MS 9 and OS 12 because Mojave Solar Project swivel joint replacement procedures were not adequate to ensure proper installation of the swivel joint, resulting in the incident.

Please respond no later than September 26, 2025, by providing an electronic copy of all corrective actions and preventive measures including procedural changes completed by Mojave Solar Project to remedy and prevent the recurrence of such violations.

If you have any questions concerning this NOV, please contact Evan Coughran at (213) 819-6803 or evan.coughran@cpuc.ca.gov.

Sincerely,

Stephen Hur

Senior Utilities Engineer - Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Banu Acimis, Program and Project Supervisor, ESRB, SED, CPUC
Evan Coughran, Utilities Engineer, ESRB, SED, CPUC

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: **09-AFC-5C**
Condition Number: **COMP 10**
Description: **Closure Letter Incident Number: GE20240315-01 Notice of Violation California Public Utilities Commission**
Submittal Number: **COMP10-11-01**

October 31, 2025

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov

Submitted electronically via email

Ms. Gutierrez,

Pursuant to Condition of Compliance 10, this letter serves to provide an update on the CPUC- NOV_GE20240315-01.

MSP submitted the requested response to "NOV_GE20240315-01" on September 25, 2025, to the California Public Utilities Commission and provided the requested information.

On October 10, 2025 Mojave Solar Project received the closure letter from the California Public Utilities Commission (CPUC), stating that "SED's investigation of the subject incident is closed. However, SED may re-open the investigation when deemed necessary."

The response from MSP and the CPUC Closure letter are included as attachments to this document.

Background: The NOV, dated September 12, 2025, cites findings from a CPUC Electric Safety and Reliability Branch (ESRB) investigation into a fire incident that occurred on March 14, 2024 in the Alpha East solar field at loop 167E. Based on the investigation, ESRB determined that the Mojave Solar Project is in violation of General Order (GO) 167-B, specifically Maintenance Standard 9 and Operating Standard 12. In response, ESRB

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

requested MSP to electronically submit a copy of all corrective actions and preventative measures, including procedural changes completed by MSP to remedy and prevent the recurrence of such violations.

Please advise if further information is required.

Sincerely,

Mahnaz Ghamati

Quality, Environmental & Compliance Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (760)498-0549
mahnaz.ghamati@atlantica.com

Attachments:

1- GE20240315-01_Mojave_Solar_Project_ClosureLetter
2- MSP Response to CPUC NOV_GE20240315-01

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 10, 2025

Davis Rosas
Plant Manager
Mojave Solar Project – Mojave Solar LLC
42134 Harper Lake Road
Hinkley, CA 92347

SUBJECT: **Closure Letter - Incident Number: GE20240315-01**

Dear Davis Rosas:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed records and corrective actions as part of its investigation of incident No. GE20240315-01 that occurred at Mojave Solar Project on March 14, 2024. SED investigated this incident based on the information received from Mojave Solar Project and any third-party documents related to the incident.

This letter serves as notification that SED's investigation of the subject incident is closed; however, SED may re-open the investigation when deemed necessary.

Thank you for your cooperation in this investigation. If you have any questions, please contact Evan Coughran at Evan.Coughran@cpuc.ca.gov or (213) 819-6803.

Sincerely,

Stephen Hur

Senior Utilities Engineer - Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Cc: Lee Palmer, Deputy Executive Director of Safety and Enforcement Division, Safety Policy and Water, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Banu Acimis, Program and Project Supervisor, ESRB, SED, CPUC
Evan Coughran, Utilities Engineer, ESRB, SED, CPUC

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Subject: Response to NOV_GE20240315-01_Mojave Solar Project

September 25, 2025

Stephen Hur
Senior Utilities Engineer Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th Street, Suite 500, Los Angeles CA 90013
(213) 264-1589
stephen.hur@cpuc.ca.gov

Submitted electronically via email

Mr. Hur,

This letter serves as Mojave Solar Project's formal response to the Notice of Violation (NOV_GE20240315-01) dated September 12, 2025, regarding the fire incident at loop 167E in the Alpha East solar field.

Required Response Actions:

Submit an electronic copy of all corrective actions and preventive measures including procedural changes completed by Mojave Solar Project to remedy and prevent the recurrence of such violations no later than September 26, 2025.

MSP Response:

Corrective Action:

The affected collector 167E was repaired following the incident and has been returned to service.

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

Preventive Actions:

1- Prior to the incident, swivel joints supplied by the manufacturer included an adhesive label indicating the correct flow direction for installation.

Following the incident, Mojave Solar Project instructed the manufacturer to engrave the installation guidance directly onto all new joints to eliminate the risk of label detachment.

Before **After**

2- The procedure for swivel joint replacement has been updated to include explicit instructions and verbiage to ensure the joint is installed facing the correct direction. Verification is now required from three designated personnel, Mechanic/Helper, Welder, and Solar Field Operator, with a supporting photo included to confirm proper orientation.

3- The updated procedure has been shared with all relevant workers, and training has been conducted for every employee involved in rotary joint replacement. This training will also be provided to any new employees assigned to joint replacement.

Mojave Solar LLC

42134 Harper Lake Road Phone: 760 308 0400
Hinkley, California 92347

The updated procedure is attached to this letter.

Should you require any additional information or clarification, please do not hesitate to contact me.

Sincerely,

David Rosas

Plant Manager
Mojave Solar Project
42134 Harper Lake Rd
Hinkley, CA 92347
Cell: (480) 286- 6070
david.rosas@atlantica.com

Attachment: SP-O&M-MJV-060 Swivel Joint Replacement, Rev 5

Atlantica
Sustainable Infrastructure

Mojave Solar Project

Maintenance Specific Procedure

Title:
Swivel Joint Replacement

Code:	SP-O&M-MJV-060
Revision:	05
Date:	07/28/2024

Produced by:	
Caleb Sowards Daniel Murica Christian Hisquierdo	Electronic Signature

Reviewed by:	
Tim Menzel Margaret Aguirre Jose Manuel Bravo Miguel Ángel Moreno Maria Leal / Enrique de Toro	Electronic Signature

Approved by:	
David Rosas	Electronic Signature

Revision Control Sheet

Revision	Date	Reason for the Revision
01	05/10/2018	Initial Release
02	04/13/2020	Updated to ASI Corporate Identity
03	09/09/2021	DOC# updated
04	03/22/2024	Updated procedure- Including the rotary joint facing verification and picture
05	07/28/2024	Updated the picture of new rotary joints with engraved label.

Contents

Cover

Revision Control Sheet

1 Objective

The purpose of this procedure is to define the steps to safety rebuild a swivel joint assembly.

2 Scope

This procedure applies to the swivel joints of the flexible hoses in the solar fields of the Mojave Solar Project.

3 References

- Lockout & Tag Out Procedure G70-16-0040-HS-HSP-000013
- Operations IIPP - Injury, Illness Prevention Program (G70-16-0040-HS-103-000001)
- Cal/OSHA, Title 8
- PTC HTF Emptying and Filling Procedure 6007-INS-ATM-57-00-2012

4 Definitions

HTF Transfer fluid, used in PTC thermal plants to transport the heat captured by the solar field.

LOTO Lock out tag out.

PTC Parabolic trough collector.

WO Work order.

5 Procedure

5.1 Preliminary Actions

Before the start of any activity, the following steps have to be carried out:

1. Obtain the corresponding work order (WO).
2. Perform Job Safety Analysis.

3. Collect all necessary tools and spare parts.
4. Make sure the proper LOTO procedure has been followed and the system is evacuated and depressurized. Proceed according to the procedure PTC HTF Emptying and Filling Procedure 6007-INS-ATM-57-00-2012.
5. Inform the control room that work is about to begin.

5.2 Swivel Joint Replacement

1. Cut the damaged swivel joint off of the flex hose assembly
2. Prepare flexhose ends and bevel.
3. Purge entire flexhose assembly.
4. Mech/Helper will install swivel joint facing correct direction.

5. Tighten swivel joint in place.
6. Welder will verify swivel joint is facing correct direction.
7. Align and tack swivel joint to flexhose ends.
    a. Ensure ground cannot arc out on the swivel joint.
8. Fully weld both sides of the swivel joint. According to the manufacturer, all welds (carbon steel parts) will be coated with a corrosion protection paint after welding.
9. Remove the purge, and the purge equipment.
10. Solar Field Operator will verify swivel joint facing correct direction before release/remove clearance.

6 Health, Safety and Environment

Participants in this process are to ensure that ASI standards of environmental, health & safety are followed at all times. Follow the PPE and other safety and health requirements specified in the LOTO/Work Clearance Document included in every SAP Work Order.

7 Responsibilities

7.1 Planner

- Schedule the work.
- Submit the work order to the maintenance supervisor.

7.2 Maintenance Supervisor

- Obtain work order.
- Explain the work procedure to the solar field welder.
- Delegate the supervision/performance of the work to the responsible and competent solar field welder.
- Check work completion.

7.3 SF Welder

- Perform the work based on the reference procedure.
- Comply with and enforce the safety standards.
- Inform the Maintenance Supervisor of any variation in the work that could affect the performance and safety of the work.
- Inform the control room operator before starting any maintenance.
- Register the tasks performed every day in the incident sheet.
- Return the work order upon completion.
- Obtain the tools and spare parts needed for each type of activity described.

- Follow LOTO procedure.

7.4 SF Operator

- Verify swivel joint was installed facing the correct direction.

8 Records

All maintenance tasks are recorded in the computerized maintenance management system (SAP).

9 Annex

FO-O&M-MJV-204 Rotary Joint Replacement Check list

Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Appendix D

AQ-SC6

On Site Vehicle and Equipment Fleet Plan

Mojave

Mojave Solar LLC

Atlantica
Sustainable Infrastructure

Onsite Vehicle and Equipment Fleet Plan (CEC COC AQ-SC6), Rev 04

PP-O&M-MJV-065

Revision	Date	Reason for Revision
00	07/08/2014	Initial Release
01	08/06/2014	CEC request for additional information (AQSC6-00-01)
02	01/30/2024	Bi- Annual update
03	02/19/2026	Bi- Annual update
04		

Produced by:	Department	Date
Amanda Steindorf	Q&E Compliance	07/08/2014

Reviewed by:	Department	Date
Mahnaz Ghamati	Q&E Compliance	02/19/2026
Jane McMannes	Q&E Compliance	08/06/2014
Kathleen Sullivan	Q&E Compliance	08/06/2014

Approved by:	Department	Date
David Rosas	Plant Manager	02/19/2026

Contents

1 Objective

The primary objective of the Onsite Vehicle and Equipment Fleet Plan (Plan) is to ensure that the project owner, when obtaining dedicated on-road or off-road vehicles for mirror washing activities and other facility maintenance activities, shall only obtain vehicles that meet California on-road vehicle emission standards or appropriate U.S.EPA/California off-road engine emission standards for the latest model year available when obtained.

2 Scope

The Plan will identify the size and type of the on-site vehicle and equipment fleet for maintenance activities, as well as the vehicle and equipment fleet purchase orders and contracts and/or purchase schedule. All onsite vehicles and equipment listed in the Plan must comply with CEC AQ-SC6 and meet California and U.S. EPA emission standards for on-road or off-road engines.

3 Definitions

CEC – California Energy Commission

CPM – Compliance Project Manager

4 References

CEC Condition of Certification AQ-SC6 states:

AQ-SC6 The project owner, when obtaining dedicated on-road or off-road vehicles for mirror washing activities and other facility maintenance activities, shall only obtain vehicles that meet California on-road vehicle emission standards or appropriate U.S.EPA/California off-road engine emission standards for the latest model year available when obtained.

Verification: At least 30 days prior to the start commercial operation, the project owner shall submit to the CPM a copy of the plan that identifies the size and type of the on-site vehicle and equipment fleet and the vehicle and equipment purchase orders and contracts and/or purchase schedule. The plan shall be updated every other year and submitted in the annual compliance report.

5 Facility Maintenance Vehicle and Equipment Fleet

The facility maintenance vehicle and equipment fleet are identified below. The table shows the size and type of the on-site vehicle and equipment fleet, delivery schedule, and California emission standards compliance.

Ye	Vehicles - Make & Model	VIN Numbers	GARAGING	DDRESS
2004	2004 Ford pickup truck, 4C	2FTRX18W14CA51362	Mojave site	Vehicles
2006	2006 International Dump Truck, model 4200SBA 4x2	1HTMPAFPX6H182486	Mojave site	Vehicles
2008	2008 Dodge pickup truck,PK	1D7HA18228S549306	Mojave site	Vehicles
2014	2014-2500 HD Utility Bed Truck	1GB0CVG7EF170734	Mojave site	Vehicles
2014	2014-3500 HD Welders Truck	1GB3C2CG6EF118435	Mojave site	Vehicles
2014	2014 Kenworth Evacuation and Pump Truck,, model T370	2NKHLJ9x2Em421629	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN0EX040500	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN1EX040179	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN1EX040263	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN2EX040546	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN2EX041065	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN5EX039908	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN5EX040766	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN6EX040288	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN6EX040775	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN7EX039909	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN7EX041126	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck w/ Access Cab	5TFNX4CN9EX040124	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN9EX040625	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TFNX4CN9EX040673	Mojave site	Vehicles
2014	2014 Toyota Pick up Truck with Reg Cab	5TFTX4CN4EX044380	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck w/ Access Cab	5TFTX4CN6EX044011	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck w/ Access Cab	5TFtX4CN6EX044915	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck w/ Access Cab	5TFTX4CN7EX044356	Mojave site	Vehicles
2014	2014 Toyota Pick Up Truck with Reg Cab	5TXNX4CN0EX040299	Mojave site	Vehicles
2014	2014 Load Trail - Trailer	4ZECH1824E1054559	Mojave site	Vehicles
2015	2015 Kenworth T-300 Water Truck, model T370	2NKHLJ9X0FM423946	Mojave site	Vehicles
2015	2015-Kenworth T-300 Water Truck,, model T370	2NKHLJ9X2FM423947	Mojave site	Vehicles
2015	2015 Isuzu 14-Ft Stake Bed Truck	JALE5W168F7300302	Mojave site	Vehicles
2015	2015 Chevrolet 3500-Welders Truck	1GB3CYG6FF156923	Mojave site	Vehicles
2015	2015 Freightliner Truck (Albatross), model 108SD	1FVAG5DT8FHGE8295	Mojave site	Vehicles
2015	2015 Freightliner Truck (Albatross), model 108SD	1FVAG5DT1FHGA2498	Mojave site	Vehicles
2024	2024 Nissan Frontier Crew Cab 27RZPV	1N6ED1EJXRN671934	Mojave site	Vehicles
2024	2024 Nissan Frontier Crew Cab 27RZQR	1N6ED1EJ3RN673122	Mojave site	Vehicles
2024	2024 Nissan Frontier Crew Cab 27RZQS	1N6ED1EJ6RN673423	Mojave site	Vehicles
2024	2024 Nissan Rogue SV	JN8BT3BA9RW361765	Mojave site	Vehicles
2024	2024 Nissan Rogue SV	JN8BT3BA1RW361694	Mojave site	Vehicles
2024	2024 Nissan Rogue SV	JN8BT3BA8RW361675	Mojave site	Vehicles
2024	2024 Nissan Rogue SV	JN8BT3BA4RW361799	Mojave site	Vehicles
2024	2024 Nissan Rogue SV	JN8BT3BA3RW361602	Mojave site	Vehicles

Year	Equipment Description	VIN	RAGING ADDRESS	
2001	Terex RT-555-1 55-Rough Terrain Crane	12531	Mojave site	Equipment
2006	SkyTrak 8042	0160023492	Mojave site	Equipment
2006	SkyTrak 8042	0160024916	Mojave site	Equipment
2006	Genie GS3384RT Dual Fuel	GS8406-41205	Mojave site	Equipment
2006	John Deere 210LE Skiploader w/ gannon	T0210LE885909	Mojave site	Equipment
2006	John Deere 210LE Skiploader w/ gannon	T0210LE886128	Mojave site	Equipment
2007	Komatsu FG30HT-16	2052394	Mojave site	Equipment
2007	Komatsu FG30HT-16	205228A	Mojave site	Equipment
2007	Genie GS3384RT Dual Fuel	GS8407-41465	Mojave site	Equipment
2007	Genie GS4390RT Dual Fuel	GS9007-44113	Mojave site	Equipment
2007	Genie GS4390RT Diesel	GS9007-44627	Mojave site	Equipment
2008	JLG 1250AJP	0300115526	Mojave site	Equipment
2008	Genie	C13508-796	Mojave site	Equipment
2008	Terex 760B Backhoe Tractor	H20073325/SmfH44TRO7Bf	Mojave site	Equipment
2008	Genie S-80	S8008-7121	Mojave site	Equipment
2008	Genie S-80	S8008-7125	Mojave site	Equipment
2010	Magnum MLT3060 Light Tower	1002756	Mojave site	Equipment
2010	Magnum MLT3060 Light Tower	1004329	Mojave site	Equipment
2010	Genie GR-20	GR10-16573	Mojave site	Equipment
2010	Genie GR-20	GR10-16612	Mojave site	Equipment
2010	Albatros Mirror Cleaning Vehicle with Brushes	1FVDG0DT2DHFD7951	Mojave site	Equipment
2011	Atlas Copco XAS185	HOP036034/4500A101xBR0	Mojave site	Equipment
2011	Atlas Copco XAS185	HOP036035/4500A1018BR0	Mojave site	Equipment
2012	Kawasaki	FJ400De090536	Mojave site	Equipment
2012	Kawasaki	FJ400De096654	Mojave site	Equipment
2020	Water Truck#3 Freightliner Model M2106	1FVHCYFE7LHLJ1317	Mojave site	Equipment
2024	Compact Tractor Loader	MEADA22DYN1360780	Mojave site	Equipment
2024	Massey Ferguson 2604H Tractor	MEADA22DYN1360796	Mojave site	Equipment
2025	Polaris Sportsman 450 2025 ATV 4 Wheeler	4XASEE505SA010852	Mojave site	Equipment
2025	Polaris Sportsman 450EPS 2025 ATV 4 Wheeler	4XASEE505SA016047	Mojave site	Equipment

6 New Vehicles

In addition to the vehicle and equipment fleet identified in the table above, any new vehicle or equipment fleet subsequently obtained for facility maintenance activities shall also meet California on-road vehicle emission standards or appropriate U.S.EPA/California off-road engine emissions for the latest model year available when obtained.

7 Compliance Reporting

The plan will be updated every other year in the Annual Compliance Report.

Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Appendix E

AQ-16

HTF Use Quantity Report

Atlantica
Sustainable Infrastructure

Owner: Mojave Solar, LLC
Address: 1553 W Todd Dr Suite 204
Tempe AZ 85283 USA
Ph.: 480-503-8937
Fax:
E-Mail: ap.us@atlantica.com
VAT:

Purchase Order.		Allocation Center.
Number.	**Date**	P/K25/05/000004-604
4500953729	01/27/2025	
Delivery Date:	03/01/2025	
Destination:	Company: Mojave Solar LLC Address: 42134 Harper Lake Road, CA Hinkley CA 92347 USA E-Mail: E-Mail:	
Consignee	Mojave Solar LLC	
Freights	Packing:	Mat. Price:
Paym.cond. Incoterm	Payment within 60 days CPT Carriage Paid	
Contact Person		

43-1781797
Solutia Inc

575 Maryville Centre Drive
St. Louis MO 63141 USA

fluids@eastman.com

Purchase Order

Id.	Part Number	Quantity	Unit	Allocation Center.	Delivery Date:	Description	Price	D1 (%)	D2 (%)	D2 (Abs.)	Net Price
00010		40,142	KG	P/K25/05/000004-604	03/01/2025	Therminol VP-1 - 10,000 Gal	2.96	0.00	0.00	0.00	118,820.32
						Amount Partial of Purchase Order					118,820.32
						Total Net Price					118,820.32
						Total PO (in USD)					118,820.32

Email quote 01-10-25

All Invoice shall be supported by this PO. If not, contact the Activity Manager.
All Invoices shall use the same breakdown of this PO.
Notwithstanding anything to the contrary in this purchase order, if an agreement has been executed the agreement T&Cs prevail over the PO's T&Cs

EASTMAN

COMMERCIAL INVOICE
SELLER
SOLUTIA INC.
A SUBSIDIARY OF EASTMAN CHEMICAL COMPANY
575 MARYVILLE CENTRE DRIVE
SAINT LOUIS MO 63141

INVOICE NO.	INVOICE DATE	PAGE NO
65968977	Feb 28, 2025	1 of 2

EASTMAN ORDER **ORDER DATE**
5139796 **Feb 13, 2025**
INVOICE TOTAL
59,290.64 USD
DUE DATE
APR 29,2025
CUSTOMER ORDER NUMBER:
4500953729

SHIP TO: **ACCT: 4308850**
MOJAVE SOLAR LLC
42134 HARPER LAKE RD
HINKLEY CA 92347-9305

BILL TO: **ACCT: 4306951**
ARIZONA SOLAR ONE LLC
1553 W TODD DRIVE SUITE 204
TEMPE AZ 85283-4845

SHIPMENT TERMS:
(CPT) CARRIAGE PAID TO, HINKLEY, CA
TRUCK FREIGHT PREPAID

PAYMENT TERMS
N60 DAYS FROM INV. DATE
SHOW INV & ACCT NO. ON REMITTANCE

PLEASE REMIT TO

ACH REMITTANCE INSTRUCTIONS:
EASTMAN CHEMICAL FINANCIAL CORPORATION
REMIT VIA EFT (820) ABA# 053101561
ACCOUNT # 2079900401181

THESE COMMODITIES, TECHNOLOGY OR SOFTWARE ARE SUBJECT TO THE EXPORT ADMINISTRATION REGULATIONS. U.S. LAW PROHIBITS EXPORTS AND RE-EXPORTS OF U.S. ITEMS TO VARIOUS COUNTRIES, ENTITIES, AND PERSONS. DIVERSION CONTRARY TO U.S. LAW IS PROHIBITED.

DESCRIPTION AND QUANTITY ORDERED	QUANTITY SHIPPED		CURRENCY IN USD UNIT PRICE AND AMOUNT	
THERMINOL® VP1 HEAT TRANSFER FLUID, BULK 5,000 GL ITEM - 10 GMN - P3433700				
DELIVERY NO. 92461520 PLANT SHIP DATE: Feb 28, 2025 TRAILER NO. MRGP7479	20,030.623	KG	2.96 PER KG	59,290.64

APPROVED
By Jennifer Puerto at 12:24 pm, 3/10/25

INVOICE TOTAL AMOUNT **USD** **59,290.64**
========

IINE 10

COUNTRY OF SHIPMENT IS USA

WE, BEING AUTHORIZED BY THE PRODUCER OF THE GOODS COVERED BY THIS INVOICE, CERTIFY IN ITS BEHALF THAT IN ITS PRODUCTION THEREOF IT HAS COMPLIED WITH ALL APPLICABLE REQUIREMENTS OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

IF YOU HAVE ANY QUESTIONS ON AMOUNT DUE, PLEASE CALL YOUR CUSTOMER SERVICE REPRESENTATIVE AT 4232240785

EASTMAN

COMMERCIAL INVOICE
SELLER
SOLUTIA INC.
A SUBSIDIARY OF EASTMAN CHEMICAL COMPANY
575 MARYVILLE CENTRE DRIVE
SAINT LOUIS MO 63141

INVOICE NO. 65968978
INVOICE DATE Feb 28, 2025
PAGE NO 1 of 2
EASTMAN ORDER **5139796**
ORDER DATE **Feb 13, 2025**
INVOICE TOTAL
59,371.20 USD
DUE DATE
APR 29,2025
CUSTOMER ORDER NUMBER:
4500953729

SHIP TO: **ACCT: 4308850**
MOJAVE SOLAR LLC
42134 HARPER LAKE RD
HINKLEY CA 92347-9305

BILL TO: **ACCT: 4306951**
ARIZONA SOLAR ONE LLC
1553 W TODD DRIVE SUITE 204
TEMPE AZ 85283-4845

SHIPMENT TERMS:
(CPT) CARRIAGE PAID TO, HINKLEY, CA
TRUCK FREIGHT PREPAID

PAYMENT TERMS
N60 DAYS FROM INV. DATE
SHOW INV & ACCT NO. ON REMITTANCE

PLEASE REMIT TO

ACH REMITTANCE INSTRUCTIONS:
EASTMAN CHEMICAL FINANCIAL CORPORATION
REMIT VIA EFT (820) ABA# 053101561
ACCOUNT # 2079900401181

THESE COMMODITIES, TECHNOLOGY OR SOFTWARE ARE SUBJECT TO THE EXPORT ADMINISTRATION REGULATIONS. U.S. LAW PROHIBITS EXPORTS AND RE-EXPORTS OF U.S. ITEMS TO VARIOUS COUNTRIES, ENTITIES, AND PERSONS. DIVERSION CONTRARY TO U.S. LAW IS PROHIBITED.

DESCRIPTION AND QUANTITY ORDERED	**QUANTITY SHIPPED**		**CURRENCY IN USD UNIT PRICE AND AMOUNT**	
THERMINOL® VP1 HEAT TRANSFER FLUID, BULK 5,000 GL ITEM - 10 GMN - P3433700				
DELIVERY NO. 92461521 PLANT SHIP DATE: Feb 28, 2025 TRAILER NO. MRGP7910	20,057.838	KG	2.96 PER KG	59,371.20

APPROVED
By Jennifer Puerto at 12:25 pm, 3/10/25

INVOICE TOTAL AMOUNT **USD** **59,371.20**
========

Line 10

COUNTRY OF SHIPMENT IS USA

WE, BEING AUTHORIZED BY THE PRODUCER OF THE GOODS COVERED BY THIS INVOICE, CERTIFY IN ITS BEHALF THAT IN ITS PRODUCTION THEREOF IT HAS COMPLIED WITH ALL APPLICABLE REQUIREMENTS OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

IF YOU HAVE ANY QUESTIONS ON AMOUNT DUE, PLEASE CALL YOUR CUSTOMER SERVICE REPRESENTATIVE AT 4232240785

Atlantica
Sustainable Infrastructure

Owner: Mojave Solar, LLC
Address: 1553 W Todd Dr Suite 204
Tempe AZ 85283 USA
Ph.: 480-503-8937
Fax:
E-Mail: ap.us@atlantica.com
VAT:

Purchase Order.		Allocation Center.
Number.	**Date**	P/K25/05/000004-604
4500964766	09/30/2025	
Delivery Date:	12/31/2025	
Destination:	Company: Mojave Solar LLC Address: 42134 Harper Lake Road, CA Hinkley CA 92347 USA E-Mail: E-Mail:	
Consignee	Mojave Solar LLC	
Freights	Packing:	Mat. Price:
Paym.cond. Incoterm	Payment within 60 days DDP Mojave Solar, PREPAY & ADD	
Contact Person	jennifer.puerto@atlantica.com ap.us@atlantica.com	

43-1781797
Solutia Inc

575 Maryville Centre Drive
St. Louis MO 63141 USA

fluids@eastman.com

Purchase Order

Id.	Part Number	Quantity	Unit	Allocation Center.	Delivery Date:	Description	Price	D1 (%)	D2 (%)	D2 (Abs.)	Net Price
00010		40,142	KG	P/K25/05/000004-604	12/31/2025	Dec 2025 Bulk Therminol VP-1	2.87	0.00	0.00	0.00	115,207.54
						Amount Partial of Purchase Order					115,207.54
						Total Net Price					115,207.54
						Total PO (in USD)					115,207.54

10,000 Gal of Therminol VP-1
Priority 2 - MUST BE DELIVERED BY DECEMBER 31, 2025
Contact: Tim Menzel
Quote: Eastman September 29, 2025
5,000 gal to Alpha plant
5,000 gal to Beta plant

All invoices must be submitted to accounts payable at ap.us@atlantica.com.
All invoices and packing lists must include the Atlantica PO number.
All invoice and packing list line items must match the corresponding Atlantica PO. (Allowed exceptions: freight and actual vs. estimated costs/services)
Invoices that do not match the Atlantica PO or fail to match line items are subject to rejection.
Notwithstanding anything to the contrary in this purchase order, if an agreement has been executed, the agreement T&Cs prevail over the PO's T&Cs.

EASTMAN

COMMERCIAL INVOICE
SELLER
SOLUTIA INC.
A SUBSIDIARY OF EASTMAN CHEMICAL COMPANY
575 MARYVILLE CENTRE DRIVE
SAINT LOUIS MO 63141

INVOICE NO.	INVOICE DATE	PAGE NO
66226011	Nov 25, 2025	1 of 2

EASTMAN ORDER **ORDER DATE**
5322251 **Oct 08, 2025**
INVOICE TOTAL
57,409.78 USD
DUE DATE
JAN 24,2026
CUSTOMER ORDER NUMBER:
4500964766

SHIP TO: **ACCT: 4308850**
MOJAVE SOLAR LLC
42134 HARPER LAKE RD
HINKLEY CA 92347-9305

BILL TO: **ACCT: 4306951**
ARIZONA SOLAR ONE LLC
1553 W TODD DRIVE SUITE 204
TEMPE AZ 85283-4845

SHIPMENT TERMS:
(CPT) CARRIAGE PAID TO, HINKLEY, CA
TRUCK FREIGHT PREPAID

PAYMENT TERMS
N60 DAYS FROM INV. DATE
SHOW INV & ACCT NO. ON REMITTANCE

PLEASE REMIT TO

ACH REMITTANCE INSTRUCTIONS:
EASTMAN CHEMICAL FINANCIAL CORPORATION
REMIT VIA EFT (820) ABA# 053101561
ACCOUNT # 2079900401181

THESE COMMODITIES, TECHNOLOGY OR SOFTWARE ARE SUBJECT TO THE EXPORT ADMINISTRATION REGULATIONS. U.S. LAW PROHIBITS EXPORTS AND RE-EXPORTS OF U.S. ITEMS TO VARIOUS COUNTRIES, ENTITIES, AND PERSONS. DIVERSION CONTRARY TO U.S. LAW IS PROHIBITED.

DESCRIPTION AND QUANTITY ORDERED	QUANTITY SHIPPED	CURRENCY IN USD UNIT PRICE AND AMOUNT

THERMINOL® VP1 HEAT TRANSFER FLUID, BULK
20,142 KG
ITEM - 10 GMN - P3433700

DELIVERY NO. 92830044	qTY = 20,003.407	KG	2.87	57,409.78
PLANT SHIP DATE: Nov 25, 2025			PER KG	Line 10
TRAILER NO. MRGP7478				

APPROVED
By Jennifer Puerto at 1:31 pm, 12/1/25

INVOICE TOTAL AMOUNT	**USD**	**57,409.78**
		========

COUNTRY OF SHIPMENT IS USA

WE, BEING AUTHORIZED BY THE PRODUCER OF THE GOODS COVERED BY THIS INVOICE, CERTIFY IN ITS BEHALF THAT IN ITS PRODUCTION THEREOF IT HAS COMPLIED WITH ALL APPLICABLE REQUIREMENTS OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

IF YOU HAVE ANY QUESTIONS ON AMOUNT DUE, PLEASE CALL YOUR CUSTOMER SERVICE REPRESENTATIVE AT 4232240785

EASTMAN

COMMERCIAL INVOICE
SELLER
SOLUTIA INC.
A SUBSIDIARY OF EASTMAN CHEMICAL COMPANY
575 MARYVILLE CENTRE DRIVE
SAINT LOUIS MO 63141

INVOICE NO. 66226012
INVOICE DATE Nov 25, 2025
PAGE NO 1 of 2
EASTMAN ORDER 5322251
ORDER DATE Oct 08, 2025
INVOICE TOTAL
57,019.24 USD
DUE DATE
JAN 24,2026
CUSTOMER ORDER NUMBER:
4500964766

SHIP TO: **ACCT: 4308850**
MOJAVE SOLAR LLC
42134 HARPER LAKE RD
HINKLEY CA 92347-9305

BILL TO: **ACCT: 4306951**
ARIZONA SOLAR ONE LLC
1553 W TODD DRIVE SUITE 204
TEMPE AZ 85283-4845

SHIPMENT TERMS:
(CPT) CARRIAGE PAID TO, HINKLEY, CA
TRUCK FREIGHT PREPAID

PAYMENT TERMS
N60 DAYS FROM INV. DATE
SHOW INV & ACCT NO. ON REMITTANCE

PLEASE REMIT TO

ACH REMITTANCE INSTRUCTIONS:
EASTMAN CHEMICAL FINANCIAL CORPORATION
REMIT VIA EFT (820) ABA# 053101561
ACCOUNT # 2079900401181

THESE COMMODITIES, TECHNOLOGY OR SOFTWARE ARE SUBJECT TO THE EXPORT ADMINISTRATION REGULATIONS. U.S. LAW PROHIBITS EXPORTS AND RE-EXPORTS OF U.S. ITEMS TO VARIOUS COUNTRIES, ENTITIES, AND PERSONS. DIVERSION CONTRARY TO U.S. LAW IS PROHIBITED.

DESCRIPTION AND QUANTITY ORDERED	QUANTITY SHIPPED	CURRENCY IN USD UNIT PRICE AND AMOUNT

THERMINOL® VP1 HEAT TRANSFER FLUID, BULK
20,000 KG
ITEM - 10 GMN - P3433700

DELIVERY NO. 92830045 Qty = 19,867.33 KG 2.87 PER KG 57,019.24
PLANT SHIP DATE: Nov 25, 2025
TRAILER NO. MRGP7430
Line 10

APPROVED
By Jennifer Puerto at 1:27 pm, 12/1/25

INVOICE TOTAL AMOUNT	**USD**	**57,019.24**

COUNTRY OF SHIPMENT IS USA

WE, BEING AUTHORIZED BY THE PRODUCER OF THE GOODS COVERED BY THIS INVOICE, CERTIFY IN ITS BEHALF THAT IN ITS PRODUCTION THEREOF IT HAS COMPLIED WITH ALL APPLICABLE REQUIREMENTS OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

IF YOU HAVE ANY QUESTIONS ON AMOUNT DUE, PLEASE CALL YOUR CUSTOMER SERVICE REPRESENTATIVE AT 4232240785

STRAIGHT BILL OF LADING - SHORT FORM

NOT NEGOTIABLE

BULK SHIPMENT

SHIPPER: SOLUTIA INC
A SUBSIDIARY OF EASTMAN CHEMICAL CO
ANNISTON - MFG PLANT
702 CLYDESDALE AVE
ANNISTON, AL 36201

RECEIVED, subject to individually determined rates or contracts that have been agreed upon between the carrier and the shipper, or his agent, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request. The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. Every service to be performed hereunder shall be subject to the terms and conditions set forth in the Uniform Freight Classification or contract(s) in effect on the date hereof. If this is a rail or rail-water shipment.

This document constitutes a delivery receipt when transportation is by private carrier, in which case bill of lading conditions are replaced by shipper's pickup condition.

FRT CODE	SHIPPER'S ORDER NUMBER	CUSTOMER ORDER NUMBER	DESTINATION CODE	ROUTING CODE	If this shipment is to be delivered to the consignee without recourse to the shipper, the shipper shall sign the following statement: "The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges."
	5322251	4500964766			

CONSIGNED TO

MOJAVE SOLAR LLC
42134 HARPER LAKE RD
HINKLEY CA 92347-9305

B/L DATE: 11/25/2025

B/L NUMBER: SO-73549156

Freight charge: PREPAID

SUBMIT BILL FOR FREIGHT CHARGES TO:
EASTMAN CHEMICAL CO.
ATTN: ACCTS. PAYABLE
P.O. BOX 511
KINGSPORT TN 37662

CAR OR VEHICLE INITIAL & NUMBER: MRGP7478

ORIGIN CARRIER & ROUTING: MARTIN TRANSPORT

COMPARTMENTS	HM	DESCRIPTION OF ARTICLES	WEIGHTS
1 TT	X	UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (BIPHENYL) 9 III RQ (BIPHENYL) MARINE POLLUTANT (DIPHENYL) BULK LIQUID CHEMICALS, NOI THERMINOL® VP1 HEAT TRANSFER FLUID, BULK CUSTOMER P.O.: 4500964766 **SHIPMENT SPECIAL INSTRUCTIONS** Call Eastman Logistics immediately at 1-800-EASTMAN, press 6 for any potential delays in loading, unloading, or during shipment. Requested Delivery 11/29/2025 COMPRESSOR APPROVED FOR UNLOADING PER CUSTOMER Pump needed? Yes Type of camlock? If you bring male & female 2# camlock fittings for your hose. We have NPT 2# pipe. Amount of hose needed? 50# Front, rear, or center unloader? Rear Delivery contact? Control Room # 760-308-0400 Delivery date and time? 7am to 4pm Monday thru Friday Other important delivery requests: None We will need 5,000 gal put in Beta plant and 5,000 gal put in Alpha plant. Deliveries:92830044	44100 LB

Transportation Emergency Contact: Chemtrec 1-800-424-9300, CCN 7321 SHIPMENT#:87157882 PRD

STRAIGHT BILL OF LADING - SHORT FORM

NOT NEGOTIABLE

SHIPPER	CONSIGNED TO
SOLUTIA INC A SUBSIDIARY OF EASTMAN CHEMICAL CO ANNISTON - MFG PLANT 702 CLYDESDALE AVE ANNISTON,AL 36201	MOJAVE SOLAR LLC 42134 HARPER LAKE RD HINKLEY CA 92347-9305
B/L NUMBER **SO-73549156**	

COMPARTMENTS	HM	DESCRIPTION OF ARTICLES	WEIGHTS
		Customer Orders:4500964766 Eastman Orders:5322251 Seals: 5354729,5354730,5354731	

SHIPPER'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. (Applies to hazardous materials only).

SHIPPER / AGENT :

PER: **AUDREY GRAY**

WHERE THE RATE IS DEPENDENT ON VALUE, the agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding 295 cents per pound for each distribution package, or 295 cents per pound for each article, or other applicable released-value amount, dependent upon the applicable classification, contract and/or tariff, and whichever results in the lowest freight charges on the date of shipment.

Motor carrier certifies below that the proper placards have been affixed when required.

Carrier certifies below that emergency response information / North American guidebook is on board the vehicle for use at all times for hazardous materials in accordance with D.O.T. requirements.

CARRIER (original signature required)

B/L NUMBER: **SO-73549156** SHIPMENT: **87157882**

Transportation Emergency Contact: Chemtrec 1-800-424-9300, CCN 7321 **SHIPMENT#:87157882** **PRD**

SOLUTIA

Solutions for a better life.™

702 Clydesdale Avenue
Anniston, Alabama 36201
(256) 236-8381

ID # DATE TIME WEIGHTS

ALL MATERIAL IS
WEIGHTED ON STATE
CERTIFIED SCALES

GROSS

TARE

NET

ALABAMA
LICENSED
PUBLIC
WEIGHMASTER
824869
COREY TAYLOR

DRIVER ON ☐ OFF ☐ WEIGHTED BY _____

EASTMAN
Register at WWW.EASTMAN.COM

Solutia Inc.
A Subsidiary of Eastman Chemical Company
575 Maryville Centre Drive
Saint Louis MO 63141

CERTIFICATE OF ANALYSIS

25 NOV 2025

Ship To:
MOJAVE SOLAR LLC
42134 HARPER LAKE RD
HINKLEY CA 92347-9305
USA

Sold To:
ARIZONA SOLAR ONE LLC
1553 W TODD DRIVE SUITE 204
TEMPE AZ 85283-4845
USA

Material Description: Therminol® VP1 Heat Transfer Fluid, Bulk
Customer Order : 4500964766 /
Outbound Delivery : 92830044000010
Shipper Sales Order : 5322251
Ship Date : 25 NOV 2025
Batch / Lot : ACF072
Vehicle No : MRGP7478
Net Weight, LB : 44,100.000
Net Weight, KG : 20,003.407
Seals : 5354729 5354730 5354731

Characteristic	Value	Lower Limit	Upper Limit
Production Date	11/25/2025		
Appearance: Clear, water white liquid	Passes		
Crystallizing Point, °C	12.3	11.9	12.3
Biphenyl, %	27.0	25.5	27.5
Diphenyl Oxide, %	73.0	72.5	74.5
Assay, %	100.0	99.9	
Density @ 25°C, g/cm³	1.0585	1.0535	1.0635
Moisture, ppm	188		300

If you have received this material from a distributor, please contact the distributor for further information.
If you have questions related to Eastman shipments, please call 800-EASTMAN (800-327-8626) for assistance.

The values and properties stated above are based upon tests and analysis of samples of the material. Eastman's exclusive commitment with respect to such values and properties is as set forth in the sales contract between your company and Eastman for such material or in Eastman's acknowledgment for the above-described shipment of material, whichever is applicable.

Michael Carden
Site Services Manager

2025 Mojave Solar LLC

Batch #	Date of Incident	Type of Incident	CEC Transmittal Ref No.	Spill Location	Description	Product	Quantity	Generated Waste	Incident Time	Soil Amt Removed	Contractor Responsible	End Point	Test #	Test date
1	1/1/2025	Low Severity	WASTE10-60-00	Alpha SF 26F	Single RFS04 leaking HTF and vaporing	HTF	3 Gallons	Contained	5:00PM	qty: 6, 55-gal Drums	No	Remediation at Beta LTU	523511	1/7/2025
2	1/20/2025	Low Severity	N/A	Beta WT	As Oily water was being processed, the amount of oil in the oily water exceeded the oil/water separator's design capacity, and about 50 gal of HTF was sent to the pond with the 'oil-free' water.	HTF	50 Gallons	Contained	6:00PM		No	Off site Disposal		
3	1/27/2025	Low Severity	N/A	WT	Filter cake sludge was spilled and cleaned up by Desert Environmental.	Sludge	500 Gallons	Contained	9:00AM		yes	Off site Disposal		
4	2/4/2025	Low Severity	N/A	Beta PB	A Beta Power Block Operator saw oil on the secondary containment of the Lube Oil/Control Oil skid and noticed that oil was leaking out of the HCCM filter.	Lube Oil	10 Gallons	Contained	6:45AM		No	Off site Disposal		
5	2/15/2025	Low Severity	Waste10-61-00	Beta 86B	Single RFS04 leaking HTF and vaporing	HTF	10 Gallons	Remediation at Beta LTU	9:30AM	qty: 5, 55-gal Drums	No	Remediation at Beta LTU	527353	2/27/2025
6	2/21/2025	Low Severity	Waste10-61-00	Beta SF 95D	Single RFS04 leaking HTF	HTF	10 Gallons	Off site Disposal	2:00 PM	qty: 6, 55-gal Drums	No	Off site Disposal	528732	3/12/2025
7	2/28/2025	Low Severity	Waste10-61-00	Alpha SF 48H	Single RFS04 leaking HTF	HTF	6 Gallons	Off site Disposal	10:00 AM	qty: 5, 55-gal Drums	No	Off site Disposal	528732	3/12/2025
8	3/28/2025	Low Severity	Waste10-61-00	Alpha SF 197F	Single RFS04 leaking HTF and vaporing	HTF	10 Gallons	Off site Disposal	4:30PM	qty: 6, 55-gal Drums	No	Off site Disposal	530579	4/8/2025
9	6/12/2025	Low Severity	N/A	Beta ULL area	Forklift hose rupture leak	Hydraulic Oil	5 Gallons	Contained	10:00AM		No	TBD		
10	8/16/2025	Low Severity	Waste10-62-00	Beta Solar Field- 91 C	Single RFS04 leaking HTF	HTF	10 Gallons	Off site Disposal	11:00 AM	qty: 4, 55-gal Drums	No	Off site Disposal	540895	8/27/2025
11	8/25/2025	Low Severity	Waste10-62-00	Beta Solar Field- 99 G	Single RFS04 leaking HTF	HTF	10 Gallons	Off site Disposal	1:30 PM	qty: 7, 55-gal Drums	No	Off site Disposal	541284	8/28/2025
12	8/25/2025	Low Severity	Waste10-62-00	Beta Solar Field- 72 I	Single RFS04 leaking HTF	HTF	15 Gallons	Off site Disposal	1:30 PM	qty: 12, 55-gal Drums	No	Off site Disposal	540895	8/27/2025

Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Appendix F

Air Quality 24

Cooling Tower Emission Rates

Cooling Tower PM-10 Records

Date	TDS	PM-10 Emission Calc	Analyst	Notes
	<3,500	<2.24		
	ppm	lb/hr		
1-Jan-25	2,677	0.60	Raul	
2-Jan-25	2,628	0.59	Raul	
3-Jan-25	2,616	0.59	Raul	CT numbers only due to cloudy weather .
4-Jan-25	2,751	0.62	Raul	
5-Jan-25	2,775	0.62	Raul	
6-Jan-25	2,844	0.64	Cynthia	
7-Jan-25	2,574	0.58		Ctnumbers only due to cloudy weather.
8-Jan-25	2,700	0.61	Cynthia	
9-Jan-25	2,983	0.67	Cynthia	
10-Jan-25	2,812	0.63	Cynthia	
11-Jan-25	2,536	0.57	Dave	
12-Jan-25	2,595	0.58	Dave	
13-Jan-25	2,632	0.59	Cynthia	
14-Jan-25	2,617	0.59	Cynthia	
15-Jan-25	2,511	0.56	Cynthia	
16-Jan-25	2,601	0.58	Cynthia	
17-Jan-25	2,608	0.58	Cynthia	
18-Jan-25	2,633	0.59	Dave	
19-Jan-25	2,501	0.56	Dave	
20-Jan-25	2,560	0.57	Dave	
21-Jan-25	2,586	0.58	Cynthia	
22-Jan-25				Numbers were not taken due to outage.
23-Jan-25				Numbers were not taken due to outage.
24-Jan-25				Numbers were not taken due to outage.
25-Jan-25				Numbers were not taken due to outage.
26-Jan-25				Numbers were not taken due to outage.
27-Jan-25				Numbers were not taken due to outage.
28-Jan-25				Numbers were not taken due to outage.
29-Jan-25				Numbers were not taken due to outage.
30-Jan-25				Numbers were not taken due to outage.
31-Jan-25	2,706	0.61		
1-Feb-25	2,094	0.47	Raul	
2-Feb-25	2,229	0.50	Dave	
3-Feb-25	2,212	0.50	Cynthia	
4-Feb-25	2,537	0.57	Cynthia	
5-Feb-25	2,347	0.53	Cynthia	
6-Feb-25	2,562	0.57	Cynthia	
7-Feb-25	2,571	0.58	Cynthia	

8-Feb-25				No leads to take samples
9-Feb-25	2,671	0.60		
10-Feb-25	2,521	0.56		
11-Feb-25				Sample drop off
12-Feb-25	2,252	0.50		
13-Feb-25	2,566	0.58		
14-Feb-25	2,612	0.59	Raul	
15-Feb-25	2,627	0.59	Raul	
16-Feb-25	2,798	0.63	Raul	
17-Feb-25	2,863	0.64		
18-Feb-25	2,759	0.62	Cynthia	
19-Feb-25	2,724	0.61	Cynthia	
20-Feb-25	3,028	0.68	Cynthia	
21-Feb-25	2,890	0.65	Cynthia	
22-Feb-25	2,891	0.65	Raul	
23-Feb-25	2,874	0.64	Raul	
24-Feb-25	2,724	0.61	Cynthia	
25-Feb-25	2,820	0.63	Cynthia	
26-Feb-25	2,705	0.61	Cynthia	
27-Feb-25	2,684	0.60	Cynthia	
28-Feb-25	2,599	0.58	Cynthia	
1-Mar-25				
2-Mar-25	2,705	0.61	Raul	
3-Mar-25	2,761	0.62	Cynthia	
4-Mar-25				
5-Mar-25	2,539	0.57	Cynthia	
6-Mar-25				
7-Mar-25	2,748	0.62	Cynthia	
8-Mar-25				
9-Mar-25				
10-Mar-25	2,823	0.63	Cynthia	
11-Mar-25	2,740	0.61	Cynthia	
12-Mar-25	2,723	0.61	Cynthia	
13-Mar-25	2,796	0.63	Cynthia	
14-Mar-25	2,833	0.63	Cynthia	
15-Mar-25	2,897	0.65	Cynthia	
16-Mar-25				
17-Mar-25				
18-Mar-25	2,911	0.65	Cynthia	
19-Mar-25	2,770	0.62	Cynthia	
20-Mar-25	3,201	0.72	Cynthia	
21-Mar-25	2,690	0.60	Dave	
22-Mar-25	2,734	0.61	Dave	
23-Mar-25	2,909	0.65	Dave	
24-Mar-25	3,046	0.68	Cynthia	
25-Mar-25	3,046	0.68	Cynthia	
26-Mar-25	2,944	0.66	Cynthia	
27-Mar-25	2,987	0.67	Cynthia	
28-Mar-25	2,798	0.63	Cynthia	
29-Mar-25	2,764	0.62	Raul	
30-Mar-25	2,818	0.63	Dave	
31-Mar-25	2,787	0.62	Cynthia	

1-Apr-25	3,168	0.71	Cynthia	
2-Apr-25	3,241	0.73	Cynthia	
3-Apr-25	2,928	0.66	Cynthia	
4-Apr-25	3,089	0.69	Cynthia	
5-Apr-25				
6-Apr-25	3,116	0.70	Raul	
7-Apr-25	3,182	0.71	Dave	
8-Apr-25	3,250	0.73	Dave	
9-Apr-25	3,558	0.80	Cynthia	
10-Apr-25	3,549	0.80	Cynthia	
11-Apr-25	3,652	0.82	Cynthia	
12-Apr-25	3,630	0.81	Raul	
13-Apr-25	3,627	0.81	Raul	
14-Apr-25	4,420	0.99	Cynthia	
15-Apr-25	4,045	0.91	Cynthia	
16-Apr-25	4,170	0.93	Cynthia	
17-Apr-25	4,446	1.00	Cynthia	
18-Apr-25	4,051	0.91	Raul	
19-Apr-25	4,298	0.96	Raul	
20-Apr-25				
21-Apr-25	4,132	0.93	Cynthia	
22-Apr-25	4,178	0.94	Cynthia	
23-Apr-25	4,378	0.98	Cynthia	
24-Apr-25	4,578	1.03	Cynthia	
25-Apr-25	4,695	1.05	Cynthia	
26-Apr-25				
27-Apr-25	4,369	0.98	Dave	
28-Apr-25	4,544	1.02	Cynthia	
29-Apr-25	4,482	1.00	Cynthia	
30-Apr-25	4,627	1.04	Cynthia	
1-May-25	4,942	1.11	Cynthia	
2-May-25	4,910	1.10	Cynthia	
3-May-25	5,002	1.12	Dave	
4-May-25	4,801	1.08	Dave	
5-May-25				
6-May-25	4,757	1.07	Cynthia	
7-May-25	4,801	1.08	Dave	
8-May-25	4,775	1.07	Cynthia	
9-May-25	5,026	1.13	Cynthia	
10-May-25	5,279	1.18	Dave	
11-May-25	5,264	1.18	Dave	
12-May-25	5,152	1.15	Cynthia	
13-May-25	5,277	1.18	Cynthia	
14-May-25	5,162	1.16	Cynthia	
15-May-25	5,184	1.16	Cynthia	
16-May-25	5,531	1.24	Cynthia	
17-May-25	5,558	1.25	Dave	
18-May-25	5,466	1.22	Dave	
19-May-25	5,530	1.24	Cynthia	
20-May-25	5,658	1.27	Cynthia	
21-May-25	5,856	1.31	Cynthia	
22-May-25	6,374	1.43	Cynthia	

23-May-25	5,628	1.26	Raul	
24-May-25	5,371	1.20	Raul	
25-May-25	5,641	1.26	Dave	
26-May-25	6,203	1.39	Dave	
27-May-25	6,036	1.35	Dave	
28-May-25	5,610	1.26	Cynthia	
29-May-25	5,713	1.28	Cynthia	
30-May-25	5,709	1.28	Cynthia	
31-May-25	6,005	1.35	Raul	
1-Jun-25	5,784	1.30	Raul	
2-Jun-25	5,446	1.22	Cynthia	
3-Jun-25	5,784	1.30	Raul	
4-Jun-25	5,232	1.17	Cynthia	
5-Jun-25	5,236	1.17	Cynthia	
6-Jun-25	5,621	1.26	Raul	
7-Jun-25	5,660	1.27	Raul	
8-Jun-25	6,077	1.36	Raul	
9-Jun-25	5,632	1.26	Cynthia	
10-Jun-25	5,507	1.23	Cynthia	
11-Jun-25	5,118	1.15	Cynthia	
12-Jun-25	5,363	1.20	Cynthia	
13-Jun-25	5,176	1.16	Cynthia	
14-Jun-25	5,131	1.15	Raul	
15-Jun-25				
16-Jun-25	5,123	1.15	Raul	
17-Jun-25	5,249	1.18	Cynthia	
18-Jun-25	5,488	1.23	Cynthia	
19-Jun-25	5,503	1.23	Cynthia	
20-Jun-25	5,643	1.26	Cynthia	
21-Jun-25	5,431	1.22	Dave	
22-Jun-25	5,517	1.24	Raul	
23-Jun-25	5,447	1.22	Cynthia	
24-Jun-25	5,691	1.28	Cynthia	
25-Jun-25	5,817	1.30	Cynthia	
26-Jun-25	6,025	1.35	Cynthia	
27-Jun-25	5,898	1.32	Cynthia	
28-Jun-25	5,747	1.29	Dave	
29-Jun-25	6,064	1.36	Dave	
30-Jun-25	5,665	1.27	Cynthia	
1-Jul-25	5,897	1.32	Cynthia	
2-Jul-25	3,708	0.83	Cynthia	
3-Jul-25				
4-Jul-25	6,682	1.50	Dave	
5-Jul-25	6,376	1.43	Dave	
6-Jul-25	6,423	1.44	Dave	
7-Jul-25	6,493	1.46	Cynthia	
8-Jul-25	3,017	0.68	Cynthia	
9-Jul-25	5,739	1.29	Cynthia	
10-Jul-25	5,840	1.31	raul	
11-Jul-25	6,565	1.47	Cynthia	
12-Jul-25	5,552	1.24	Dave	
13-Jul-25	5,834	1.31	Dave	

14-Jul-25	5,793	1.30	Cynthia	
15-Jul-25	5,578	1.25	Cynthia	
16-Jul-25	4,781	1.07	Cynthia	
17-Jul-25	5,096	1.14	Raul	
18-Jul-25	5,544	1.24	Raul	
19-Jul-25	5,790	1.30	Raul	
20-Jul-25	7,964	1.78	Dave	
21-Jul-25	8,270	1.85	Cynthia	
22-Jul-25	8,889	1.99	Cynthia	
23-Jul-25	7,995	1.79	Cynthia	
24-Jul-25	7,862	1.76	Cynthia	
25-Jul-25	6,759	1.51	Cynthia	
26-Jul-25	6,487	1.45	Raul	
27-Jul-25	6,076	1.36	Raul	
28-Jul-25	5,524	1.24	Cynthia	
29-Jul-25	5,679	1.27	Cynthia	
30-Jul-25	5,362	1.20	Cynthia	
31-Jul-25	5,213	1.17	Cynthia	
1-Aug-25	4,880	1.09	Cynthia	
2-Aug-25	4,896	1.10	Raul	
3-Aug-25	4,571	1.02	Raul	
4-Aug-25	4,493	1.01	Cynthia	
5-Aug-25				
6-Aug-25	4,151	0.93	Cynthia	
7-Aug-25				
8-Aug-25	3,693	0.83	Cynthia	
9-Aug-25	3,806	0.85	Raul	
10-Aug-25	3,815	0.85	Raul	
11-Aug-25	3,898	0.87	Cynthia	
12-Aug-25	3,910	0.88	Cynthia	
13-Aug-25	3,849	0.86	Cynthia	
14-Aug-25	4,008	0.90	Cynthia	
15-Aug-25	3,885	0.87	Cynthia	
16-Aug-25				
17-Aug-25	3,710	0.83	Raul	
18-Aug-25	3,827	0.86	Cynthia	
19-Aug-25	3,994	0.90	Cynthia	
20-Aug-25	4,046	0.91	Cynthia	
21-Aug-25				
22-Aug-25	4,305	0.96	Raul	
23-Aug-25	4,305	0.96	Raul	
24-Aug-25	4,272	0.96	Raul	
25-Aug-25	4,022	0.90	Cynthia	
26-Aug-25	3,830	0.86	Cynthia	
27-Aug-25	3,461	0.78	Cynthia	
28-Aug-25	3,370	0.76	Cynthia	Cooling towers only due to climate chang
29-Aug-25	3,455	0.77	Cynthia	
30-Aug-25				Weekend chemistry was not completed
31-Aug-25	4,076	0.91	Raul	
1-Sep-25	3,803	0.85	Raul	
2-Sep-25	4,188	0.94	Cynthia	Cooling towers only due to climate change

3-Sep-25	3,616	0.81	Cynthia	
4-Sep-25	4,298	0.96	Cynthia	
5-Sep-25	5,445	1.22	Raul	
6-Sep-25	5,301	1.19	Raul	
7-Sep-25	5,404	1.21	Raul	
8-Sep-25				off site/ Not availible for testing
9-Sep-25	4,728	1.06	Cynthia	
10-Sep-25	4,519	1.01	Cynthia	
11-Sep-25	4,205	0.94	Cynthia	
12-Sep-25	4,545	1.02	Cynthia	
13-Sep-25	4,531	1.02	Raul	
14-Sep-25	4,521	1.01	Raul	
15-Sep-25	4,506	1.01	Cynthia	
16-Sep-25	4,493	1.01	Cynthia	
17-Sep-25	4,316	0.97	Cynthia	
18-Sep-25	4,605	1.03	Cynthia	Cooling towers only due to climate change
19-Sep-25	4,304	0.96	Cynthia	Cooling towers onky due to climate
20-Sep-25	3,881	0.87	raul	
21-Sep-25	4,175	0.94	raul	
22-Sep-25	4,075	0.91	Cynthia	Numbers effected by climate change
23-Sep-25	4,465	1.00	Cynthia	
24-Sep-25	4,103	0.92	Cynthia	
25-Sep-25	3,897	0.87	Cynthia	
26-Sep-25	4,157	0.93	Cynthia	
27-Sep-25	3,844	0.86	Raul	Cloudy day, cooling towers only
28-Sep-25	3,930	0.88	Raul	
29-Sep-25	3,704	0.83	Cynthia	
30-Sep-25	3,200	0.72	Cynthia	
1-Oct-25				Off site/ not availible for testing
2-Oct-25	3,743	0.84	Cynthia	
3-Oct-25	3,913	0.88	Cynthia	
4-Oct-25	3,621	0.81	Ricky	
5-Oct-25	3,562	0.80	Ricky	
6-Oct-25	3,269	0.73	Cynthia	
7-Oct-25	3,732	0.84	Cynthia	
8-Oct-25	3,674	0.82	Cynthia	
9-Oct-25	3,261	0.73	Cynthia	
10-Oct-25	3,592	0.80	Cynthia	
11-Oct-25	3,789	0.85	Raul	
12-Oct-25				Weekend chemistry was not completed
13-Oct-25	3,844	0.86	Raul	
14-Oct-25	3,641	0.82	Cynthia	cooling towers only due to climate change
15-Oct-25	3,665	0.82	Cynthia	
16-Oct-25	4,158	0.93	Cynthia	
17-Oct-25	4,159	0.93	Cynthia	
18-Oct-25				Weekend chemistry was not completed
19-Oct-25				Weekend chemistry was not completed

20-Oct-25	4,332	0.97	Cynthia	
21-Oct-25	4,325	0.97	Cynthia	
22-Oct-25	4,470	1.00	Cynthia	
23-Oct-25	4,652	1.04	Cynthia	
24-Oct-25	4,666	1.05	Cynthia	
25-Oct-25				Weekend chemistry was not completed
26-Oct-25				Weekend chemistry was not completed
27-Oct-25	4,486	1.01	Cynthia	
28-Oct-25	4,092	0.92	Cynthia	
29-Oct-25	4,450	1.00	Cynthia	
30-Oct-25	4,269	0.96	Cynthia	
31-Oct-25	4,176	0.94	Cynthia	
1-Nov-25	4,750	1.06	Raul	
2-Nov-25	4,783	1.07	Raul	
3-Nov-25	4,779	1.07	Cynthia	
4-Nov-25				Off site, not availible for testing
5-Nov-25	3,975	0.89	Cynthia	
6-Nov-25	4,047	0.91	Cynthia	
7-Nov-25	3,983	0.89	Cynthia	
8-Nov-25	3,708	0.83	Ricky	
9-Nov-25	4,081	0.91	Raul	
10-Nov-25	3,787	0.85	Raul	
11-Nov-25	3,747	0.84	Raul	Cooling Towers only due to climate
12-Nov-25	3,802	0.85	Cynthia	Cooling Towers only due to climate
13-Nov-25	3,805	0.85	Cynthia	
14-Nov-25	3,514	0.79	Cynthia	Cooling Towers only due to climate
15-Nov-25	3,514	0.79	Cynthia	Cooling Towers only due to climate
16-Nov-25	3,529	0.79	Cynthia	Cooling Towers only due to climate
17-Nov-25	3,478	0.78	Cynthia	Cooling Towers only due to climate
18-Nov-25	3,531	0.79	Cynthia	
19-Nov-25	3,903	0.87	Cynthia	
20-Nov-25	4,109	0.92	Cynthia	
21-Nov-25	3,820	0.86	Cynthia	Cooling Towers only due to climate
22-Nov-25	3,860	0.87	Cytnhia	Cooling Towers only due to climate
23-Nov-25	3,984	0.89	Ricky	
24-Nov-25	3,925	0.88	Cynthia	
25-Nov-25	4,120	0.92	Cynthia	
26-Nov-25	4,366	0.98	Cynthia	
27-Nov-25	3,750	0.84	Raul	Cooling Towers only due to climate
28-Nov-25	4,175	0.94	Ricky	
29-Nov-25	4,123	0.92	Ricky	
30-Nov-25	4,023	0.90	Ricky	
1-Dec-25	4,056	0.91	Cynthia	
2-Dec-25	3,958	0.89	Ricky	
3-Dec-25	3,958	0.89	Ricky	
4-Dec-25	3,981	0.89	Cynthia	
5-Dec-25	4,092	0.92	Cynthia	
6-Dec-25	4,139	0.93	Raul	
7-Dec-25	4,173	0.94	Ricky	
8-Dec-25	4,238	0.95	Cynthia	

9-Dec-25	4,357	0.98	Ricky	
10-Dec-25	4,082	0.91	Cynthia	
11-Dec-25	4,655	1.04	Cynthia	
12-Dec-25	4,420	0.99	Cynthia	
13-Dec-25	4,410	0.99	Raul	
14-Dec-25	3,855	0.86	Raul	
15-Dec-25	3,786	0.85	Cynthia	
16-Dec-25	3,832	0.86	Cynthia	
17-Dec-25	4,387	0.98	Cynthia	
18-Dec-25	4,264	0.96	Cynthia	Cooling Towers only due to climate
19-Dec-25	4,064	0.91	Cynthia	
20-Dec-25	3,785	0.85	Raul	
21-Dec-25	4,047	0.91	Raul	
22-Dec-25	3,953	0.89	Cynthia	
23-Dec-25	3,702	0.83	Cynthia	Cooling Towers only due to climate
24-Dec-25	3,712	0.83	Cynthia	Cooling Towers only due to climate
25-Dec-25	3,972	0.89	Ricky	
26-Dec-25	4,190	0.94	Raul	Cooling Towers only due to climate
27-Dec-25	4,373	0.98	Raul	
28-Dec-25				
29-Dec-25	4,036	0.90	Raul	
30-Dec-25	4,019	0.90	Raul	Cooling Towers only due to climate
31-Dec-25	4,079	0.91	Ricky	Cooling Towers only due to climate

Cooling Tower PM-10 Records

Date	TDS <3,500 ppm	PM-10 Emission Calc <2.24 lb/hr	Analyst	Notes
1-Jan-25	2,489	0.56	Raul	
2-Jan-25	2,688	0.60	Raul	
3-Jan-25	2,501	0.56	Raul	CT numbers only due to cloudy weather.
4-Jan-25	2,513	0.56	Raul	
5-Jan-25	2,487	0.56	Raul	
6-Jan-25	2,442	0.55	Cynthia	
7-Jan-25				Numbers were not taken due to outage.
8-Jan-25				Numbers were not taken due to outage.
9-Jan-25				Numbers were not taken due to outage.
10-Jan-25				Numbers were not taken due to outage.
11-Jan-25				Numbers were not taken due to outage.
12-Jan-25				Numbers were not taken due to outage.
13-Jan-25				Numbers were not taken due to outage.
14-Jan-25				Numbers were not taken due to outage.
15-Jan-25				Numbers were not taken due to outage.
16-Jan-25				Numbers were not taken due to outage.
17-Jan-25	2,518	0.56	Cynthia	
18-Jan-25	2,518	0.56	Dave	
19-Jan-25	2,481	0.56	Dave	
20-Jan-25	2,531	0.57	Dave	
21-Jan-25	2,611	0.59	Cynthia	
22-Jan-25	2,526	0.57	Cynthia	
23-Jan-25	2,263	0.51	Cynthia	
24-Jan-25	2,467	0.55	Cynthia	
25-Jan-25	2,467	0.55	Dave	
26-Jan-25	2,391	0.54	Dave	
27-Jan-25	2,380	0.53	Cynthia	
28-Jan-25	2,551	0.57	Cynthia	
29-Jan-25	2,391	0.54	Cynthia	
30-Jan-25	2,114	0.47	Cynthia	
31-Jan-25	2,706	0.61	Cynthia	
1-Feb-25	2,240	0.50	Raul	
2-Feb-25	2,262	0.51	Dave	
3-Feb-25	2,168	0.49	Cynthia	
4-Feb-25	2,194	0.49	Cynthia	

5-Feb-25	2,283	0.51	Cynthia	
6-Feb-25	2,218	0.50	Cynthia	
7-Feb-25	2,431	0.54	Cynthia	
8-Feb-25				No leads to take samples
9-Feb-25	2,431	0.54		
10-Feb-25	2,292	0.51		
11-Feb-25				Sample drop off
12-Feb-25	2,296	0.51		
13-Feb-25	2,321	0.52		
14-Feb-25	2,353	0.53	Raul	
15-Feb-25	2,405	0.54	Raul	
16-Feb-25	2,304	0.52	Raul	
17-Feb-25	2,302	0.52		
18-Feb-25	2,207	0.49	Cynthia	
19-Feb-25	2,649	0.59	Cynthia	
20-Feb-25	2,283	0.51	Cynthia	
21-Feb-25	2,454	0.55	Cynthia	
22-Feb-25	2,513	0.56	Raul	
23-Feb-25	2,564	0.57	Raul	
24-Feb-25	2,642	0.59	Cynthia	
25-Feb-25	2,623	0.59	Cynthia	
26-Feb-25	2,447	0.55	Cynthia	
27-Feb-25	2,582	0.58	Cynthia	
28-Feb-25	2,457	0.55	Cynthia	
1-Mar-25				
2-Mar-25				
3-Mar-25	2,770	0.62	Raul	
4-Mar-25	2,583	0.58	Cynthia	
5-Mar-25				
6-Mar-25	2,388	0.54	Cynthia	
7-Mar-25				
8-Mar-25	2,499	0.56	Cynthia	
9-Mar-25				
10-Mar-25				
11-Mar-25	2,650	0.59	Cynthia	
12-Mar-25	2,525	0.57	Cynthia	
13-Mar-25	2,587	0.58	Cynthia	
14-Mar-25	2,472	0.55	Cynthia	
15-Mar-25	2,472	0.55	Cynthia	
16-Mar-25	2,636	0.59	Cynthia	
17-Mar-25				
18-Mar-25				
19-Mar-25	2,586	0.58	Cynthia	
20-Mar-25	2,711	0.61	Cynthia	
21-Mar-25	2,938	0.66	Cynthia	
22-Mar-25	2,720	0.61	Dave	
23-Mar-25	2,768	0.62	Dave	
24-Mar-25	2,743	0.61	Dave	
25-Mar-25	2,833	0.63	Cynthia	
26-Mar-25	2,833	0.63	Cynthia	
27-Mar-25	2,408	0.54	Cynthia	
28-Mar-25	2,810	0.63	Cynthia	
29-Mar-25	2,885	0.65	Cynthia	

30-Mar-25	2,910	0.65	Raul
31-Mar-25	2,981	0.67	Dave
1-Apr-25	2,629	0.59	Cynthia
2-Apr-25	2,677	0.60	Cynthia
3-Apr-25	2,672	0.60	Cynthia
4-Apr-25	2,338	0.52	Cynthia
5-Apr-25	2,854	0.64	Cynthia
6-Apr-25			
7-Apr-25	2,862	0.64	Raul
8-Apr-25	2,814	0.63	Dave
9-Apr-25	2,893	0.65	Dave
10-Apr-25	3,106	0.70	Cynthia
11-Apr-25	3,329	0.75	Cynthia
12-Apr-25	3,284	0.74	Cynthia
13-Apr-25	3,258	0.73	Raul
14-Apr-25	3,204	0.72	Raul
15-Apr-25	3,020	0.68	Cynthia
16-Apr-25	3,654	0.82	Cynthia
17-Apr-25	3,375	0.76	Cynthia
18-Apr-25	3,314	0.74	Cynthia
19-Apr-25	3,371	0.76	Raul
20-Apr-25	3,951	0.89	Raul
21-Apr-25			
22-Apr-25	3,635	0.81	Cynthia
23-Apr-25	3,709	0.83	Cynthia
24-Apr-25	3,817	0.86	Cynthia
25-Apr-25	3,646	0.82	Cynthia
26-Apr-25	3,738	0.84	Cynthia
27-Apr-25			
28-Apr-25	4,003	0.90	Dave
29-Apr-25	4,014	0.90	Cynthia
30-Apr-25	4,153	0.93	Cynthia
1-May-25	3,993	0.89	Cynthia
2-May-25	4,212	0.94	Cynthia
3-May-25	4,123	0.92	Cynthia
4-May-25	4,101	0.92	Dave
5-May-25	4,203	0.94	Dave
6-May-25			
7-May-25	3,877	0.87	Cynthia
8-May-25	4,203	0.94	Dave
9-May-25	4,485	1.01	Cynthia
10-May-25	4,502	1.01	Cynthia
11-May-25	4,587	1.03	Dave
12-May-25	4,586	1.03	Dave
13-May-25	4,380	0.98	Cynthia
14-May-25	4,582	1.03	Cynthia
15-May-25	4,525	1.01	Cynthia
16-May-25	4,534	1.02	Cynthia
17-May-25	4,779	1.07	Cynthia
18-May-25	5,236	1.17	Dave
19-May-25	5,077	1.14	Dave
20-May-25	4,738	1.06	Cynthia
21-May-25	4,786	1.07	Cynthia

22-May-25	5,323	1.19	Cynthia		
23-May-25	5,119	1.15	Cynthia		
24-May-25	5,094	1.14	Raul		
25-May-25	4,927	1.10	Raul		
26-May-25	4,592	1.03	Dave		
27-May-25	4,691	1.05	Dave		
28-May-25	4,424	0.99	Dave		
29-May-25	4,274	0.96	Cynthia		
30-May-25	4,459	1.00	Cynthia		
31-May-25	4,332	0.97	Cynthia		
1-Jun-25	4,056	0.91	Raul		
2-Jun-25	4,063	0.91	Raul		
3-Jun-25	3,546	0.79	Cynthia		
4-Jun-25					
5-Jun-25	3,933	0.88	Cynthia		
6-Jun-25	3,774	0.85	Cynthia		
7-Jun-25	3,953	0.89	Raul		
8-Jun-25	4,038	0.90	Raul		
9-Jun-25	3,696	0.83	Raul		
10-Jun-25	3,807	0.85	Cynthia		
11-Jun-25	3,791	0.85	Cynthia		
12-Jun-25	3,722	0.83	Cynthia		
13-Jun-25	3,589	0.80	Cynthia		
14-Jun-25	5,176	1.16	Cynthia		
15-Jun-25	3,582	0.80	Raul		
16-Jun-25					
17-Jun-25	3,457	0.77	Raul		
18-Jun-25	3,416	0.77	Cynthia		
19-Jun-25	3,598	0.81	Cynthia		
20-Jun-25	3,661	0.82	Cynthia		
21-Jun-25	3,753	0.84	Cynthia		
22-Jun-25	3,642	0.82	Dave		
23-Jun-25	3,322	0.74	Raul		
24-Jun-25	3,264	0.73	Cynthia		
25-Jun-25	3,096	0.69	Cynthia		
26-Jun-25	3,158	0.71	Cynthia		
27-Jun-25	3,351	0.75	Cynthia		
28-Jun-25	3,340	0.75	Cynthia		
29-Jun-25	4,181	0.94	Dave		
30-Jun-25	3,254	0.73	Dave		
1-Jul-25	3,120	0.70	Cynthia		
2-Jul-25	3,034	0.68	Cynthia		
3-Jul-25	2,876	0.64	Cynthia		
4-Jul-25					
5-Jul-25	2,934	0.66	Dave		
6-Jul-25	3,085	0.69	Dave		
7-Jul-25	3,231	0.72	Dave		
8-Jul-25	3,248	0.73	Cynthia		
9-Jul-25	6,002	1.35	Cynthia		
10-Jul-25	2,998	0.67	Cynthia		
11-Jul-25	3,081	0.69	raul		
12-Jul-25	3,164	0.71	Cynthia		
13-Jul-25	3,087	0.69	Dave		

14-Jul-25	3,178	0.71	Dave	
15-Jul-25	3,244	0.73	Cynthia	
16-Jul-25	3,306	0.74	Cynthia	
17-Jul-25			Cynthia	
18-Jul-25	3,223	0.72	Raul	
19-Jul-25	3,091	0.69	Cynthia	
20-Jul-25	3,425	0.77	Raul	
21-Jul-25	3,677	0.82	Dave	
22-Jul-25	3,539	0.79	Cynthia	
23-Jul-25	3,415	0.77	Cynthia	
24-Jul-25	3,304	0.74	Cynthia	
25-Jul-25	3,153	0.71	Cynthia	
26-Jul-25	3,179	0.71	Cynthia	
27-Jul-25	2,991	0.67	Raul	
28-Jul-25	3,023	0.68	Raul	
29-Jul-25	3,067	0.69	Cynthia	
30-Jul-25	3,310	0.74	Cynthia	
31-Jul-25	3,372	0.76	Cynthia	
1-Aug-25	3,222	0.72	Cynthia	
2-Aug-25	3,216	0.72	Cynthia	
3-Aug-25	3,339	0.75	Raul	
4-Aug-25	3,326	0.75	Raul	
5-Aug-25	3,462	0.78	Cynthia	
6-Aug-25				
7-Aug-25	3,107	0.70	Cynthia	
8-Aug-25				
9-Aug-25	3,633	0.81	Cynthia	
10-Aug-25	3,676	0.82	Raul	
11-Aug-25	3,799	0.85	Raul	
12-Aug-25	3,784	0.85	Cynthia	
13-Aug-25	4,003	0.90	Cynthia	
14-Aug-25	4,028	0.90	Cynthia	
15-Aug-25	4,017	0.90	Cynthia	
16-Aug-25	3,852	0.86	Cynthia	
17-Aug-25				
18-Aug-25	3,623	0.81	Raul	
19-Aug-25	3,445	0.77	Cynthia	
20-Aug-25	3,809	0.85	Cynthia	
21-Aug-25	3,635	0.81	Cynthia	
22-Aug-25				
23-Aug-25	4,165	0.93	Raul	
24-Aug-25	3,744	0.84	Raul	
25-Aug-25	4,174	0.94	Raul	
26-Aug-25	3,715	0.83	Cynthia	
27-Aug-25	4,031	0.90	Cynthia	
28-Aug-25	3,903	0.87	Cynthia	
29-Aug-25	3,373	0.76	Cynthia	Cooling towers only due climate change
30-Aug-25	4,019	0.90	Cynthia	
31-Aug-25				Weekend chemistry was not completed
1-Sep-25	4,330	0.97	Raul	
2-Sep-25	3,923	0.88	Raul	
3-Sep-25	3,640	0.82	Cynthia	cooling towers only due to climate change

4-Sep-25	3,572	0.80	Cynthia	
5-Sep-25	3,528	0.79	Cynthia	
6-Sep-25	3,539	0.79	Raul	
7-Sep-25	3,503	0.79	Raul	
8-Sep-25	3,381	0.76	Raul	
9-Sep-25				Off site / Not availible for testing
10-Sep-25	3,437	0.77	Cynthia	
11-Sep-25	3,479	0.78	Cynthia	
12-Sep-25	3,545	0.79	Cynthia	
13-Sep-25	3,512	0.79	Cynthia	
14-Sep-25	3,591	0.80	Raul	
15-Sep-25	3,680	0.82	Raul	
16-Sep-25	3,595	0.81	Cynthia	
17-Sep-25	3,770	0.84	Cynthia	
18-Sep-25	3,759	0.84	Cynthia	
19-Sep-25	3,640	0.82	Cynthia	cooling towers only due to climate change
20-Sep-25	3,743	0.84	Cynthia	Cooling towers only due to climate change
21-Sep-25	3,598	0.81	raul	
22-Sep-25	3,544	0.79	raul	
23-Sep-25	3,540	0.79	Cynthia	Numbers effected by climate
24-Sep-25	376	0.08	Cynthia	
25-Sep-25	3,893	0.87	Cynthia	
26-Sep-25	3,810	0.85	Cynthia	
27-Sep-25	3,863	0.87	Cynthia	
28-Sep-25	4,109	0.92	Raul	Cloudy day, cooling towers only
29-Sep-25	4,004	0.90	Raul	
30-Sep-25	3,936	0.88	Cynthia	
1-Oct-25	3,965	0.89	Cynthia	
2-Oct-25				Off site/ not availible for testing
3-Oct-25	4,115	0.92	Cynthia	
4-Oct-25	3,912	0.88	Cynthia	
5-Oct-25	3,912	0.88	Ricky	
6-Oct-25	3,877	0.87	Ricky	
7-Oct-25	3,956	0.89	Cynthia	
8-Oct-25	3,728	0.84	Cynthia	
9-Oct-25	3,812	0.85	Cynthia	
10-Oct-25	3,553	0.80	Cynthia	
11-Oct-25	3,596	0.81	Cynthia	
12-Oct-25	3,852	0.86	Raul	
13-Oct-25				weekend chemistry was not completed
14-Oct-25	3,890	0.87	Raul	
15-Oct-25	4,148	0.93	Cynthia	colling towers only due to climate change
16-Oct-25	3,845	0.86	Cynthia	
17-Oct-25	4,062	0.91	Cynthia	
18-Oct-25	4,227	0.95	Cynthia	
19-Oct-25				weekend chemistry was not completed
20-Oct-25				weekend chemistry was not completed

21-Oct-25	5,492	1.23	Cynthia	
22-Oct-25	4,471	1.00	Cynthia	
23-Oct-25	4,580	1.03	Cynthia	
24-Oct-25	4,604	1.03	Cynthia	
25-Oct-25	4,953	1.11	Cynthia	
26-Oct-25				weekend chemistry was not completed
27-Oct-25				weekend chemistry was not completed
28-Oct-25	4,287	0.96	Cynthia	
29-Oct-25	4,455	1.00	Cynthia	
30-Oct-25	4,392	0.98	Cynthia	
31-Oct-25	4,146	0.93	Cynthia	
1-Nov-25	4,218	0.95	Cynthia	
2-Nov-25	4,236	0.95	Raul	
3-Nov-25	4,227	0.95	Raul	
4-Nov-25	3,927	0.88	Cynthia	
5-Nov-25				Off site, not availible for testing
6-Nov-25	3,773	0.85	Cynthia	
7-Nov-25	3,855	0.86	Cynthia	
8-Nov-25	3,882	0.87	Cynthia	
9-Nov-25	3,947	0.88	Ricky	
10-Nov-25	4,561	1.02	Raul	
11-Nov-25	4,629	1.04	Raul	
12-Nov-25	4,088	0.92	Raul	Cooling Towers only due to climaate
13-Nov-25	3,999	0.90	Cynthia	Cooling Towers only due to climaate
14-Nov-25	4,010	0.90	Cynthia	
15-Nov-25	3,728	0.84	Cynthia	Cooling Towers only due to climaate
16-Nov-25	3,731	0.84	Cynthia	Cooling Towers only due to climaate
17-Nov-25	3,748	0.84	Cynthia	Cooling Towers only due to climaate
18-Nov-25	3,698	0.83	Cynthia	Cooling Towers only due to climaate
19-Nov-25	3,951	0.89	Cynthia	
20-Nov-25	4,052	0.91	Cynthia	
21-Nov-25	4,046	0.91	Cynthia	
22-Nov-25	3,860	0.87	Cynthia	Cooling Towers only due to climaate
23-Nov-25	3,924	0.88	Cynthia	Cooling Towers only due to climaate
24-Nov-25	4,285	0.96	Ricky	
25-Nov-25	4,647	1.04	Cynthia	
26-Nov-25	3,690	0.83	Cynthia	
27-Nov-25	3,437	0.77	Cynthia	
28-Nov-25	3,503	0.79	Raul	Cooling Towers only due to climaate
29-Nov-25	3,825	0.86	Ricky	
30-Nov-25	4,048	0.91	Ricky	
1-Dec-25	4,015	0.90	Ricky	
2-Dec-25	4,351	0.98	Cynthia	
3-Dec-25	4,067	0.91	Ricky	
4-Dec-25	4,067	0.91	Ricky	
5-Dec-25	4,203	0.94	Cynthia	
6-Dec-25	3,852	0.86	Cynthia	
7-Dec-25	3,722	0.83	Raul	
8-Dec-25	3,636	0.81	Ricky	
9-Dec-25	3,937	0.88	Cynthia	
10-Dec-25	4,007	0.90	Ricky	

11-Dec-25	4,155	0.93	Cynthia	
12-Dec-25	3,998	0.90	Cynthia	
13-Dec-25	4,173	0.94	Cynthia	
14-Dec-25	3,984	0.89	Raul	
15-Dec-25	4,130	0.93	Raul	
16-Dec-25	4,150	0.93	Cynthia	
17-Dec-25	4,057	0.91	Cynthia	
18-Dec-25	4,371	0.98	Cynthia	
19-Dec-25	4,342	0.97	Cynthia	Cloudy day
20-Dec-25	3,828	0.86	Cynthia	
21-Dec-25	4,256	0.95	Raul	
22-Dec-25	3,866	0.87	Raul	
23-Dec-25	3,736	0.84	Cynthia	Cloudy day
24-Dec-25	3,940	0.88	Cynthia	Cloudy day
25-Dec-25	3,932	0.88	Cynthia	Cloudy day
26-Dec-25	3,692	0.83	Ricky	
27-Dec-25	4,202	0.94	Raul	Cloudy day
28-Dec-25	4,334	0.97	Raul	
29-Dec-25				
30-Dec-25	3,848	0.86	Raul	Cloudy day
31-Dec-25	3,848	0.86	Raul	Cloudy day
31-Dec-23	3,729	0.84	Raul	Cloudy day

Mojave Solar LLC
42134 Harper Lake Road
Hinkley, California 92347
Phone: 760 308 0400

Appendix G

Air Quality 34

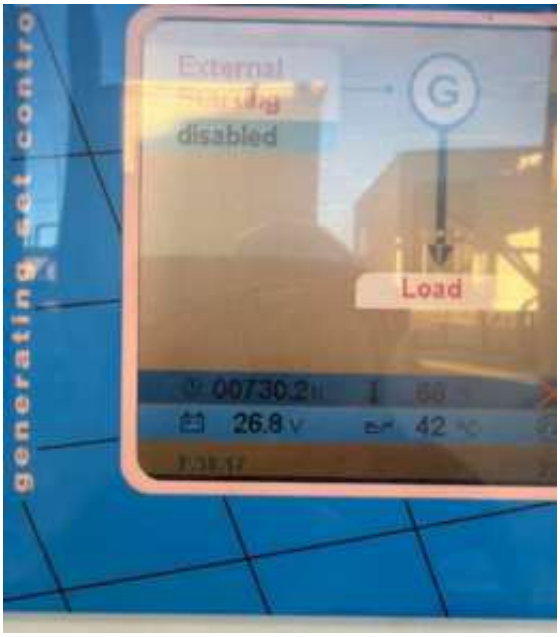
Emergency Generator Fuel and Time of Use Records

2025 Panel Pictures of Emergency Diesel Generator

AQ34

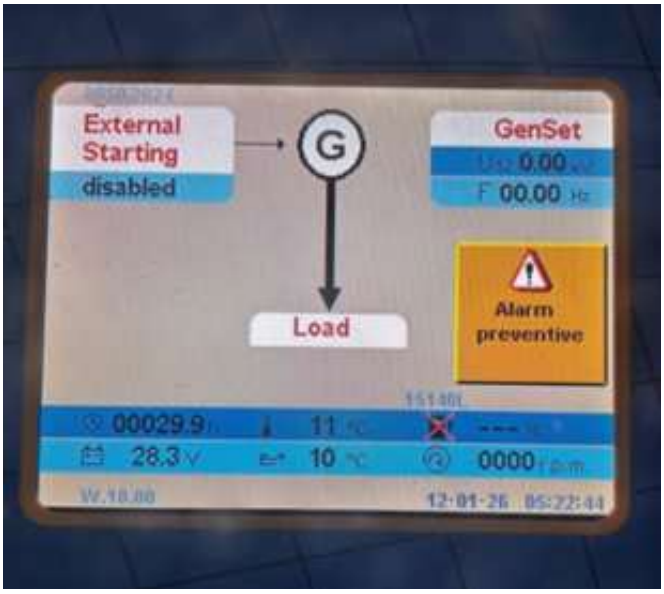
Alpha

E011042



Beta

E011043



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Sustainable Infrastructure

Mojave Solar LLC

Emergency Diesel Generator Weekly Test Log

Plant: Alpha **Date:** 1/19/25

Operator: Marcelino

Main Generator Breaker		Comments
Open		
Closed	✓	
Engine		**Comments**
Start Time:	1951	
Stop Time:		
Total Run Time:	10 min	
Starting Hour Meter Reading	646	
Monthly Fuel Consumption(gal)	—	
Oil Level	✓	
Coolant Level	✓	Coolant Temp. @ Start 54 °c Finish= 72 °c
Belt Condition	✓	
Oil Pressure	58	Start = 0 bar Finish= 6.8 bar
Battery Condition	✓	
Battery Voltage	27.1	
Engine RPMs	1800	
Generator		**Comments**
Generator Volts	26.8	
Generator Amps		
Generator "KVA"		
Reason For Use		**Comments**
Testing	✓	
Emergency		
Maintenance		
Generator		**Comments**
Fuel Delivered	—	
Fuel Level 1/4 1/2 3/4 F		
Sulfur Concentrations <0.0015% (15ppm)	—	

This Emergency Generator shall be limited to use for emergency power, as defined as in response to a fire or when utility back-feed power is not available. In addition, this unit shall be operated no more than 20 minutes during any hour and 50 hours per year for testing and maintenance excluding compliance source testing. There is no limit on engine operation for Emergency use. This engine may operate in response to notification of impending loss of utility back-feed power if the interconnected utility has ordered an outage to the plant or expects to order such outages at a particular time the engine is operated no more than 30 minutes prior to the forecasted outage and the engine is shut immediately after the utility advises that the outage no longer imminent or in effect.

Note: Fuel consumption 14.01 gal/h (43.57 /s) of load approximately.

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Mojave Solar LLC

Emergency Diesel Generator Weekly Test Log

Plant: Alpha **Date:** 1/22/25

Operator: Antone | Jose

Main Generator Breaker		Comments
Open	✓	
Closed	✓	closed after warm up
Engine		**Comments**
Start Time:	0620	1/22/25
Stop Time:	1826	1/24/25
Total Run Time:	59.6 hours	
Starting Hour Meter Reading	646.9	end 1/24/25 706.5
Monthly Fuel Consumption(gal)		
Oil Level	✓	
Coolant Level	✓	Coolant Temp. @ Start 59 °c Finish=75°c
Belt Condition	✓	
Oil Pressure	✓	Start = 6.5 bar Finish=6.2 bar
Battery Condition	✓	
Battery Voltage	26.8	
Engine RPMs	1800	
Generator		**Comments**
Generator Volts	4.17	
Generator Amps		
Generator "KVA"		
Reason For Use		**Comments**
Note: Record the run times during the emergency and the outages as an emergency hour.		
Testing and Maintenance- 50Hr/Yr.		
Emergency- Unlimited Hours	✓	OUTAGE
Generator		**Comments**
Fuel Delivered		
Fuel Level 1/4 1/2 3/4 (F)		
Sulfur Concentrations <0.0015% (15ppm)		

This Emergency Generator shall be limited to use for emergency power, as defined as in response to a fire or when utility back feed power is not available. In addition, this unit shall be operated no more than 30 minutes during any hour and 50 hours per year for testing and maintenance excluding compliance source testing. There is no limit on engine operation for Emergency use.This engine may operate in response to notification of impending loss of utility back feed power if the interconnected utility has ordered an outage to the plant or expects to order such outages at a particular time the engine is operated no more than 30 minutes prior to the forecasted outage and the engine is shut immediately after the utility advises that the outage no longer imminent or in effect.

Note: Fuel consumption 114.01 gal/h (431.57 l/h) of load approximately.

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Mojave Solar LLC

Emergency Diesel Generator Bi-Hourly Readings

Plant: Alpha | Operator: Antone / Jose | Date: 1/22/25

Time	Oil Psi.	Gen Voltage	Engine RPM	Coolant Temp.	Fuel Level	Hour Meter	Oil Temp	Gen. KwH	Batt. Volts
0620	0	4.17	0	54	5'3"	00646.9	30	1458	26.8
0820	6.5	4.18	1800	74	5'1"	00647.4	73	0979	27.7
1020	6.5	4.15	1799	75	4'11"	00650.6	73	0958	27.6
1220	6.4	4.16	1800	75	4'7"	00652.1	73	1068	27.5
1420	6.3	4.17	1800	76	4'4"	00654.3	75	1134	27.5
1620	6.3	4.16	1800	76	4'2"	00656.4	75	1145	27.4
1820	6.4	4.15	1800	74	4'0"	00658.2	73	476520	27.5
2020	6.4	4.17	1800	73	4'9.5"	00660.3	72	478519	27.5
2220	6.3	4.18	1800	73	4'7.5"	6629	73	480517	27.5
0020	6.3	4.16	1800	73	3'5.5"	664.6	73	482449	27.6
0220	6.3	4.18	1800	73	4'3"	666.3	73	484475	27.5
0420	6.3	4.18	1800	73	4'1"	668.2	73	486416	27.6

Comments: _____

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Sustainable Infrastructure

Mojave Solar LLC

Emergency Diesel Generator Bi-Hourly Readings

Plant: Algabe Operator: Antonio / Jose G Date: 1/22/25

Time	Oil Psi.	Gen Voltage	Engine RPM	Coolant Temp.	Fuel Level	Hour Meter	Oil Temp	Gen. KwH	Batt. Volts
0620	6.3	4.16	1800	73	2' 10"	00670.2	77	488448	27.7
0820	6.3	4.17	1800	75	2' 8"	00672.5	73	491894	27.6
1020	6.2	4.17	1799	75	4' 11"	00674.4	72	492999	27.5
1220	6.2	4.17	1800	76	4' 8"	00676.0	75	494819	27.5
1420	6.2	4.17	1799	76	4' 5"	00678.2	74	497313	27.5
1620	6.2	4.17	1798	76	4' 2"	00680.3	74	500377	27.5
1820	6.2	4.16	1800	73	4' 11"	683.3	73	502731	27.5
2020	6.3	4.17	1800	74	4' 9.5"	684.6	72	504015	27.5
2220	6.3	4.17	1800	73	4' 7"	686.5	72	506030	27.6
0020	6.2	4.17	1800	74	4' 3.5"	688.8	72	508539	27.6
0220	6.2	4.17	1800	73	4' 2"	690.8	72	510661	27.6
0420	6.2	4.17	1800	73	3' 12"	692.7	72	512704	27.6
0620	6.2	4.16	1800	73	3' 12"	694.2	72	514312	27.6
0820	6.2	4.17	1800	74	3' 7"	696.5	77	516873	27.6
1020	6.1	4.17	1800	76	5' 9"	698	72	518979	27.5
1220	6.1	4.17	1800	76	5' 8"	700	72	522394	27.5
1420	6.1	4.17	1799	76	5' 7"	702	75	523478	27.5
1620									
1821	6.2	4.16	1799	75	5' 3.5"	705.4	73	526555	27.4

Comments: EDG OFF @ 1826 1/24/25

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Mojave Solar LLC

Emergency Diesel Generator Weekly Test Log

Plant: Alpha **Date:** 1/27/25

Operator: Diego Rodriguez

Main Generator Breaker		Comments
Open	✓	
Closed	✓	closed after warm up
Engine		**Comments**
Start Time:	17:44	1/27/25
Stop Time:	05:15	1/28/25
Total Run Time:	11h. 29m	
Starting Hour Meter Reading	706.5	end 718.1 1/28/25
Monthly Fuel Consumption(gal)		
Oil Level	✓	
Coolant Level	✓	Coolant Temp. @ Start 64 °c Finish= 72 °c
Belt Condition	✓	
Oil Pressure	✓	Start = 8.2 bar Finish= 6.2 bar
Battery Condition	✓	
Battery Voltage	26.9	
Engine RPMs	1800	
Generator		**Comments**
Generator Volts	4.14	
Generator Amps		
Generator "KVA"		
Reason For Use		**Comments**
Note: Record the run times during the emergency and the outages as an emergency hour.		
Testing and Maintenance- 50Hr/Yr.		
Emergency- Unlimited Hours	✓	Switchyard & Powerline work
Generator		**Comments**
Fuel Delivered		
Fuel Level 1/4 1/2 3/4 (F)		
Sulfur Concentrations <0.0015% (15ppm)		

This Emergency Generator shall be limited to use for emergency power, as defined as in response to a fire or when utility back-feed power is not available. In addition, this unit shall be operated no more than 30 minutes during any hour and 50 hours per year for testing and maintenance excluding compliance source testing. There is no limit on engine operation for Emergency use.This engine may operate in response to notification of impending loss of utility back-feed power if the interconnected utility has ordered an outage to the plant or expects to order such outages at a particular time the engine is operated no more than 30 minutes prior to the forecasted outage and the engine is shut immediately after the utility advises that the outage no longer imminent or in effect.

Note: Fuel consumption 114.01 gal/h (431.57 l/h) of load approximately.

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Mojave Solar LLC

Emergency Diesel Generator Bi-Hourly Readings

Plant: MJPH Operator: DIEGO Date: 12/7/25

Time	Oil Psi.	Gen Voltage	Engine RPM	Coolant Temp.	Fuel Level	Hour Meter	Oil Temp	Gen. KwH	Batt. Volts
1744	6.2	4.14	1800	69	5'9"	702.5	37	527077	26.9
2021	6.3	4.17	1800	74	5'3"	710.1	72	530719	27.4
2340	6.3	4.17	1799	73	5'0"	712.6	72	532796	27.6
0138	6.2	4.17	1799	74	4'10"	714.4	73	534476	27.6
0330	6.3	4.18	1799	74	4'7"	716.3	72	536317	27.5
0449	6.2	4.17	1800	74	4'6"	717.6	73	537550	27.6
0517	6.2	4.18	1799	72	4'5"	718.1	74	538070	27.4
						718.1			

Comments: EDG SYNC @1750

EDG BACK ON AUTO @0515

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Mojave Solar LLC

Fire Pump Weekly Test Log

General Information

Plant: Alpha ☑ Beta ☐	Date: 01/04/25
Operator: Roy	**To be completed each time unit is operated.** **The NFPA Form AES 5.1must be completed weekly.**
Reason for running pumps: Weekly test ☑ Maintenance ☐ Emergency ☐	

Jockey Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☑ Valves ☑

Check the jockey pump on pressure drop. Start up pressure: 155 psi

Discharge Pressure: 160

Pump Suction Pressure: N/A Pump Discharge pressure: N/A

Comments:

Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☑ Valves ☑

Start the pump on pressure drop. Start up pressure: 145 psi

Start time: 2200

Pump Suction Pressure: 15 psi Pump Discharge pressure: 155 psi

Stop time: 2210 Total time running 10 min

Comments:

Diesel Pump

Pre-start Inspection: Coolant ☑ Oil ☑ Mechanical ☑ Valves ☑ Water Jacket Heater ☑

Fuel level > 2/3: Yes ☑ No ☐ Monthly Fuel Consumption:

Battery volt Crank 1: 27.1 Battery volt Crank 2: 27.1	Battery Condition: Good
Starting hour meter:	Start time:
Oil pressure start:	Oil Pressure finish:

Pump Suction Pressure: Pump Discharge pressure:

Coolant temperature after 30 minutes running:

Stop time: Stop hour meter: Total run time: January 1st hour meter: Total YTD hours:

Comments: Coolant low didn't run

Sulfur Concentrations (less than or equal to 0.0015% on a weight per weight basis).

This new diesel drive fire pump engine shall be limited to use for emergency fire suppression, defined as in response to a fire or due to low line water pressure. In addition, this engine shall be operated no more than 30 minutes in any one hour and no more than 16 hours per year for initial start up testing and compliance demonstrations. Additionally, this engine shall not be operated more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25- "Standards for the Inspection, Testing, and Maintenance of Water Based Fire Systems" (current edition). The hours of operation for source testing will not be counted towards either of the allowable annual limits above.

Note: Fuel consumption 27 gal/h approximately.

There is no limit on engine operation for emergency use. [Title 17 CCR 93115.6(a)(4)]

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Mojave Solar LLC

Automated Fire Systems Inspection Checklist

Plant: ALPHA ☑ BETA: ☐ Date: 1/4/25 Operator: Marcelino

Valve Shed # 1 by Condenser

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	SG Unit 1 A/B1-1	160	O/C	✓	Y ☑ N ☐	
2	SG Unit 2 A/B1-2	160	O/C	✓	Y ☑ N ☐	
3	Reheaters A/B1-3	160	O/C	✓	Y ☑ N ☐	
4	Rack 2 West HTF A/B1-4	160	O/C	✓	Y ☑ N ☐	
5	Rack 2 East HTF A/B1-5	160	O/C	✓	Y ☑ N ☐	
6	North Steel Pro A/B1-6	155	O/C	✓	Y ☑ N ☐	
7	HTF Pumps A/B1-7	155	O/C	✓	Y ☑ N ☐	
8	HTF Heaters A/B1-8	160	O/C	✓	Y ☑ N ☐	
9	South Steel Pro A/B1-9	160	O/C	✓	Y ☑ N ☐	
10	Lube Oil A/B1-10	160	O/C	✓	Y ☑ N ☐	
11	Turbine Hose Stations A/B1-11	155	O/C	✓	Y ☑ N ☐	
12	Turbine Bearings A/B1-12	160	O/C	✓	Y ☑ N ☐	

Valve Shed # 2 by Overflow

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Expansion Vessels A/B2-1	160	O/C	✓	Y ☑ N ☐	
2	Sillage Area A/B2-2	160	O/C	✓	Y ☑ N ☐	
3	Sillage Structure A/B2-11	160	O/C	✓	Y ☑ N ☐	
4	Rack 1 Middle Area A/B2-5	160	O/C	✓	Y ☑ N ☐	
5	Overflow Tanks A/B2-9	160	O/C	✓	Y ☑ N ☐	
6	Rack 1 South Area A/B2-6	160	O/C	✓	Y ☑ N ☐	
7	Rack 1 West A/B2-7	160	O/C	✓	Y ☑ N ☐	
8	Rack 1 North Area A/B2-4	160	O/C	✓	Y ☑ N ☐	
9	Over flow AFFF A/B2-8	160	O/C	✓	Y ☑ N ☐	
10	Expansion Vessel AFFF A/B2-3	160	O/C	✓	Y ☑ N ☐	

Valve Shed # 3 by Bldg 35 GE Electrical Bldg

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Transformer Aux	160	O/C	✓	Y ☑ N ☐	
2	Transformer Main	160	O/C	✓	Y ☑ N ☐	

Valve Shed # 4 by Cooling Tower West Side

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Cooling Tower West Side	160	O/C	✓	Y ☑ N ☐	

Valve Shed # 5 by Control Bldg 10

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Control Room A/B4-5	160	O/C	✓	Y ☑ N ☐	
2	Offices A/B4-3	160	O/C	✓	Y ☑ N ☐	
3	Electrical Room A/B4-4	160	O/C	✓	Y ☑ N ☐	

Turbine Sprinkler Valves (These are to be locked in the open position)

No.	System	Locked	Viv. Pos.	Comments
1	Bearing 2	Y ☑ N ☐	O/C	
2	Bearing 3	Y ☑ N ☐	O/C	
3	Bearing 4	Y ☑ N ☐	O/C	
4	Bearing 5	Y ☑ N ☐	O/C	

HTF Deluge System Valves (To be Locked in the Open Position)

No.	System	Locked	Viv. Pos.	Comments
1	MP-200	Y ☑ N ☐	O/C	
2	MP-200A	Y ☑ N ☐	O/C	
3	MP-200B	Y ☑ N ☐	O/C	
4	MP-200C	Y ☑ N ☐	O/C	
5	MP-200D	Y ☑ N ☐	O/C	

Fire Pump House Deluge System

No.	System	PSI	O/C	Locked	Comments
1	Fire Pump House Deluge	170	O	Y ☐ N ☐	

PIV Checks

No.	System	Position	Cycled	Date Cycled	Comments
1	Warehouse/Maintenance Shop Drive Way #7	O/C			
2	Warehouse/Maintenance Shop Drive Way #8	O/C			
3	West Side Power Block by VS-3 # 9	O/C			
4	West Side Power Block by VS-1 # 10	O/C			
5	West Side Cooling Tower by VS-1 # 11	O/C			
6	West side Cooling Tower by VS 4 # 12	O/C			
7	N.W. Corner Chemical Storage #1	O/C			
8	N.E. Corner Chemical Storage # 2	O/C			
9	East Side W.T. by Multimedia Filters # 3	O/C			
10	East Side W.T. by Multimedia Filters # 5	O/C			
11	North Side Bldg 10 # 6	O/C			
12	Between MP 444's and Water Treat # 4	O/C			
13	Beta Only West Side Power Block Valve Shed #1	O/C			

To Be Cycled First Saturday of Every Month

No.	System	Debris	Comments / Actions
1	Transformer Yard Refuse Check	Y ☐ N ☑	

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Sustainable Infrastructure

Mojave Solar LLC

Fire Pump Weekly Test Log

General Information

Plant: Alpha ☑ Beta ☐	Date: 1/15/25
Operator: Marcelino	**To be completed each time unit is operated.** **The NFPA Form AES 5.1must be completed weekly.**
Reason for running pumps: Weekly test ☑ Maintenance ☐ Emergency ☐	

Jockey Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☑ Valves ☑	
Check the jockey pump on pressure drop. Start up pressure: 155psi	
Discharge Pressure: 160psi	
Pump Suction Pressure: N/A	Pump Discharge pressure: N/A
Comments:	

Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☐ Valves ☐	
Start the pump on pressure drop. Start up pressure: 145psi	
Start time: 2130	
Pump Suction Pressure: 25psi	Pump Discharge pressure: 155psi
Stop time: 2140	Total time running 10 mins
Comments:	

Diesel Pump

Pre start Inspection: Coolant ☐ Oil ☐ Mechanical ☐ Valves ☐ Water Jacket Heater ☐	
Fuel level > 2/3: Yes ☐ No ☐	Monthly Fuel Consumption:
Battery volt Crank 1: Battery volt Crank 2:	Battery Condition:
Starting hour meter:	Start time:
Oil pressure start:	Oil Pressure finish:
Pump Suction Pressure:	Pump Discharge pressure:
Coolant temperature after 30 minutes running:	
Stop time: Stop hour meter: Total run time:	January 1st hour meter: Total YTD hours:
Comments: Low Coolant did not run	
Sulfur Concentrations (less than or equal to 0.0015% on a weight per weight basis).	

This new diesel drive fire pump engine shall be limited to use for emergency fire suppression, defined as in response to a fire or due to low fire water pressure. In addition, this engine shall be operated no more than 30 minutes in any one hour and no more than 50 hours per year for initial start-up testing and compliance demonstrations. Additionally, this engine shall not be operated more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 "Standards for the Inspection, Testing, and Maintenance of Water Based Fire Systems" (current edition). The hours of operation for source testing will not be counted towards either of the allowable annual limits above.

Note: Fuel consumption 27 gal/ h approximately.

There is no limit on engine operation for emergency use. [Title 17 CCR 93115.6(a)(1)]

Atlantica
Sustainable Infrastructure

Mojave Solar LLC

Automated Fire Systems Inspection Checklist

Plant: ALPHA ☑ BETA: ☐ Date: 1-11-24 Operator: Roy

Valve Shed # 1 by Condenser

No.	System	PSI	Vlv. Pos.	Signage	Locked	Comments
1	SS Unit 1	160	✓ O/C	✓	Y ☐ N ☐	
2	SS Unit 2	160	✓ O/C	✓	Y ☑ N ☐	
3	Reheaters	160	✓ O/C	✓	Y ☑ N ☐	
4	Rack 2 West HTF	155	✓ O/C	✓	Y ☑ N ☐	
5	Rack 2 East HTF	160	✓ O/C	✓	Y ☑ N ☐	
6	North Steel Pro	155	✓ O/C	✓	Y ☑ N ☐	
7	HTF Pumps	155	✓ O/C	✓	Y ☑ N ☐	
8	HTF Heaters	155	✓ O/C	✓	Y ☑ N ☐	
9	South Steel Pro	160	✓ O/C	✓	Y ☑ N ☐	
10	Lube Oil	160	✓ O/C	✓	Y ☑ N ☐	
11	Turbine Hose Stations	150	✓ O/C	✓	Y ☑ N ☐	
12	Turbine Bearings	155	✓ O/C	✓	Y ☑ N ☐	

Valve Shed # 2 by Overflow

No.	System	PSI	Vlv. Pos.	Signage	Locked	Comments
1	Expansion Vessels [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
2	Ullage Area [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
3	Ullage Structure [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
4	Rack 1 Middle Area [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
5	Overflow Tanks [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
6	Rack 1 South Area [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
7	Rack 1 West [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
8	Rack 1 North Area [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
9	Overflow AFT [illegible]	160	✓ O/C	✓	Y ☑ N ☐	
10	Expansion Vessel Area [illegible]	160	✓ O/C	✓	Y ☑ N ☐	

Valve Shed # 3 by Bldg 35 GE Electrical Bldg

No.	System	PSI	Vlv. Pos.	Signage	Locked	Comments
1	Transformer Aux	160	✓ O/C	✓	Y ☑ N ☐	
2	Transformer Main	160	✓ O/C	✓	Y ☑ N ☐	

Valve Shed # 4 by Cooling Tower West Side

No.	System	PSI	Vlv. Pos.	Signage	Locked	Comments
1	Cooling Tower West Side	160	✓ O/C	✓	Y ☑ N ☐	

Valve Shed # 5 by Control Bldg 10

No.	System	PSI	Vlv. Pos.	Signage	Locked	Comments
1	Control Room A-34-5	160	✓ O/C	✓	Y ☑ N ☐	
2	Offices A-31-5	160	✓ O/C	✓	Y ☑ N ☐	
3	Electrical Room A-34-4	160	✓ O/C	✓	Y ☑ N ☐	

Turbine Sprinkler Valves (These are to be locked in the open position)

No.	System	Locked	Vlv. Pos.	Comments
1	Bearing 2	Y ☑ N ☐	✓ O/C	
2	Bearing 3	Y ☑ N ☐	✓ O/C	
3	Bearing 4	Y ☑ N ☐	✓ O/C	
4	Bearing 5	Y ☑ N ☐	✓ O/C	

HTF Deluge System Valves (To be Locked in the Open Position)

No.	System	Locked	Vlv. Pos.	Comments
1	MP-201	Y ☐ N ☑	✓ O/C	missing red zip tie
2	MP-200A	Y ☑ N ☐	✓ O/C	
3	MP-200B	Y ☑ N ☐	✓ O/C	
4	MP-200C	Y ☑ N ☐	✓ O/C	
5	MP-200D	Y ☑ N ☐	✓ O/C	

Fire Pump House Deluge System

No.	System	PSI	O/C	Locked	Comments
1	Fire Pump House Deluge	140	O	Y ☑ N ☐	

PIV Checks

No.	System	Position	Cycled	Date Cycled	Comments
1	Warehouse/Maintenance Shop Drive Way #7	O/C ✓			
2	Warehouse/Maintenance Shop Drive Way #8	✓ O/C			
3	West Side Power Block by VS-3 # 9	✓ O/C			
4	West Side Power Block by VS-1 # 10	✓ O/C			
5	West Side Cooling Tower by VS-4 # 11	✓ O/C			
6	West side Cooling Tower by VS-4 # 12	✓ O/C			
7	N.W. Corner Chemical Storage #1	✓ O/C			
8	N.E. Corner Chemical Storage # 2	✓ O/C			
9	East Side W.T. by Multimedia Filters # 3	✓ O/C			
10	East Side W.T. by Multimedia Filters # 5	✓ O/C			
11	North Side Bldg 10 # 3	✓ O/C			
12	Between MP 444's and Water Treat # 4	O/C ✓			
13	Beta Only West Side Power Block Valve Shed #1	✓ O/C			

To Be Cycled First Saturday of Every Month

No.	System		Date	Comments / Actions
1	Transformer Yard Deluge Check	Y ☐ N ☐		

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Sustainable Infrastructure

Mojave Solar LLC

Fire Pump Weekly Test Log

General Information

Plant: Alpha ☑ Beta ☐	Date: 1/19/26
Operator: Martelino	**To be completed each time unit is operated.** **The NFPA Form AES 5.1must be completed weekly.**
Reason for running pumps: Weekly test ☑ Maintenance ☐ Emergency ☐	

Jockey Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☑ Valves ☑

Check the jockey pump on pressure drop. Start up pressure: 135

Discharge Pressure: 162

Pump Suction Pressure: — Pump Discharge pressure: —

Comments:

Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☑ Valves ☑

Start the pump on pressure drop. Start up pressure: 145

Start time: 2030

Pump Suction Pressure: 70 Pump Discharge pressure: 150

Stop time: 2040 Total time running 10min

Comments:

Diesel Pump

Pre-start Inspection: Coolant ☑ Oil ☑ Mechanical ☑ Valves ☑ Water Jacket Heater ☐

Fuel level > 2/3: Yes ☐ No ☐ Monthly Fuel Consumption:

Battery volt Crank 1: Battery volt Crank 2:	Battery Condition: Some Rubber corrosion.
Starting hour meter:	Start time:
Oil pressure start:	Oil Pressure finish:
Pump Suction Pressure:	Pump Discharge pressure:
Coolant temperature after 30 minutes running:	
Stop time: Stop hour meter: Total run time:	January 1st hour meter: Total YTD hours:

Comments:

Sulfur Concentrations (less than or equal to 0.0015% on a weight per weight basis).

This new diesel drive fire pump engine shall be limited to use for emergency fire suppression, defined as in response to a fire or due to low fire water pressure. In addition, this engine shall be operated no more than 30 minutes in any one hour and no more than 30 hours per year for initial start-up testing and compliance demonstrations. Additionally, this engine shall not be operated more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25-"Standards for the Inspection, Testing, and Maintenance of Water Based Fire Systems" (current edition). The hours of operation for source testing will not be counted towards either of the allowable annual limits above.

Note: Fuel consumption 27 gal/h approximately.

There is no limit on engine operation for emergency use. (Title 17 CCR 93115.6(a)(4))

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Mojave Solar LLC

Automated Fire Systems Inspection Checklist

Plant: ALPHA ☑ BETA: ☐ Date: 1/16/25 Operator: [illegible]

Valve Shed # 1 by Condenser

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	SG unit 1	160	✓O/C	✓	Y☑ N☐	
2	SG unit 2	160	✓O/C	✓	Y☑ N☐	
3	Reheaters	160	✓O/C	✓	Y☑ N☐	
4	Rack 2 West HTF	160	✓O/C	✓	Y☑ N☐	
5	Rack 2 East HTF	160	✓O/C	✓	Y☑ N☐	
6	North Steel Pit	160	✓O/C	✓	Y☑ N☐	
7	HTF Pumps	160	✓O/C	✓	Y☑ N☐	
8	HTF heaters	160	✓O/C	✓	Y☑ N☐	
9	South Steel Pit	160	✓O/C	✓	Y☑ N☐	
10	Lube Oil	160	✓O/C	✓	Y☑ N☐	
11	Turbine Hose Stations	160	✓O/C	✓	Y☑ N☐	
12	Turbine Bearings	160	✓O/C	✓	Y☑ N☐	

Valve Shed # 2 by Overflow

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Expansion Vessels	160	✓O/C	✓	Y☑ N☐	
2	Ullage Area	160	✓O/C	✓	Y☑ N☐	
3	Ullage structure	160	✓O/C	✓	Y☑ N☐	
4	Rack 1 Middle Area	160	✓O/C	✓	Y☑ N☐	
5	Overflow Tanks	160	✓O/C	✓	Y☑ N☐	
6	Rack 1 South Area	160	✓O/C	✓	Y☑ N☐	
7	Rack 1 West	160	✓O/C	✓	Y☑ N☐	
8	Rack 1 North Area	160	✓O/C	✓	Y☑ N☐	
9	Over flow AFFF	160	✓O/C	✓	Y☑ N☐	
10	Expansion Vessel AFFF	160	✓O/C	✓	Y☑ N☐	

Valve Shed # 3 by Bldg 35 GE Electrical Bldg

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Transformer Aux	160	✓O/C	✓	Y☑ N☐	
2	Transformer Main	160	✓O/C	✓	Y☑ N☐	

Valve Shed # 4 by Cooling Tower West Side

No.	System	PSI	Viv. Pos.	Signage		Comments
1	Cooling Tower West Side	160	✓O/C	✓	Y☑ N☐	

Valve Shed # 5 by Control Bldg 10

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Control Room	160	✓O/C	✓	Y☑ N☐	
2	Offices	160	✓O/C	✓	Y☑ N☐	
3	Electrical Room	160	✓O/C	✓	Y☑ N☐	

Turbine Sprinkler Valves (These are to be locked in the open position)

No.	System	Locked	Viv. Pos.	Comments
1	Bearing 2	Y☐ N☐	✓O/C	
2	Bearing 3	Y☑ N☐	✓O/C	
3	Bearing 4	Y☑ N☐	✓O/C	
4	Bearing 5	Y☑ N☐	✓O/C	

HTF Deluge System Valves (To be Locked in the Open Position)

No.	System	Locked	Viv. Pos.	Comments
1	MP 201	Y☐ N☑	✓O/C	
2	MP 2004	Y☑ N☐	✓O/C	
3	MP 2006	Y☑ N☐	✓O/C	
4	MP-200C	Y☑ N☐	✓O/C	
5	MP 200D	Y☑ N☐	✓O/C	

Fire Pump House Deluge System

No.	System	PSI	O/C	Locked	Comments
1	Fire Pump House Deluge	175	O	Y☑ N☐	

PIV Checks

No.	System	Position	Cycled	Date Cycled	Comments
1	Warehouse/Maintenance Shop Drive Way #7	O/C✓			
2	Warehouse/Maintenance Shop Drive Way #8	✓O/C			
3	West Side Power Block by VS 3 # 9	✓O/C			
4	West Side Power Block by VS 1 # 10	✓O/C			Missing Sign
5	West Side Cooling Tower by VS 4 # 11	✓O/C			
6	West side Cooling Tower by VS-4 # 12	✓O/C			
7	N.W. Corner Chemical Storage #1	✓O/C			
8	N.E. Corner Chemical storage # 2	✓O/C			
9	East Side W.T. by Multimedia Filters # 2	✓O/C			
10	East Side W.T. by Multimedia Filters # 5	✓O/C			
11	North Side Bldg 10 # 6	✓O/C			
12	Between MP-4444 and Water Treat # 4	O/C✓			
13	Beta Only West Side Power Block Valve Shed #1	O/C			Only Beta

To Be Cycled First Saturday of Every Month

No.	System	Debris	Comments / Actions
1	Transformer Yard Refuse Check	Y☐ N☑	

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Sustainable Infrastructure

Mojave Solar LLC

Fire Pump Weekly Test Log

General Information

Plant: Alpha ☑ Beta ☐	Date: 1/25/25
Operator: Marcelino	**To be completed each time unit is operated.** **The NFPA Form AES 5.1must be completed weekly.**
Reason for running pumps: Weekly test ☑ Maintenance ☐ Emergency ☐	

Jockey Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☑ Valves ☑

Check the jockey pump on pressure drop. Start up pressure: 155

Discharge Pressure: 165

Pump Suction Pressure: N/A Pump Discharge pressure: 165

Comments:

Electric Pump

Pre-start Inspection: Electrical Feed ☑ Mechanical ☑ Valves ☑

Start the pump on pressure drop. Start up pressure: 145 psi

Start time: 0540

Pump Suction Pressure: 15 psi Pump Discharge pressure: 155 psi

Stop time: 0550 Total time running 10 mins

Comments:

Diesel Pump

Pre-start Inspection: Coolant ☐ Oil ☐ Mechanical ☐ Valves ☐ Water Jacket Heater ☐

Fuel level > 2/3: Yes ☐ No ☐ Monthly Fuel Consumption:

Battery volt Crank 1: Battery volt Crank 2:	Battery Condition:
Starting hour meter:	Start time:
Oil pressure start:	Oil Pressure finish:

Pump Suction Pressure: Pump Discharge pressure:

Coolant temperature after 30 minutes running:

Stop time: Stop hour meter: Total run time: January 1st hour meter: Total YTD hours:

Comments: Low coolant did not run

Sulfur Concentrations (less than or equal to 0.0015% on a weight per weight basis).

This new direct drive fire pump engine shall be limited to use for emergency fire suppression, defined as in response to a fire or due to low fire water pressure. In addition, this engine shall be operated no more than 30 minutes in any one hour and no more than 16 hours per year for initial start-up testing and compliance demonstrations. Additionally, this engine shall not be operated more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 "Standards for the Inspection, Testing, and Maintenance of Water Based Fire Systems" (current edition). The hours of operation for source testing will not be counted towards either of the allowable annual limits above.

Note: Fuel consumption 27 ga / h approximately

There is no limit on engine operation for emergency use. [Title 17 CCR 93115.6(a)(1)]

Atlantica
Sustainable Infrastructure

Mojave Solar LLC

Automated Fire Systems Inspection Checklist

Plant: ALPHA ☑ BETA: ☐ Date: 1/25/25 Operator: Marcelino Serabia

Valve Shed # 1 by Condenser

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	SG unit 1	160	O/C	✓	Y☐ N☐	
2	SG unit 2	160	O/C	✓	Y☐ N☐	
3	Reheaters	160	O/C	✓	Y☐ N☐	
4	Rack 2 West HTF	150	O/C	✓	Y☐ N☐	
5	Rack 2 East HTF	160	O/C	✓	Y☐ N☐	
6	North Steel Pile	160	O/C	✓	Y☐ N☐	
7	Fire Pumps	☑	O/C	✓	Y☐ N☐	Locked
8	Oil Heaters	155	O/C	✓	Y☐ N☐	
9	South Steel Pile	160	O/C	✓	Y☐ N☐	
10	Lube Oil	160	O/C	✓	Y☐ N☐	
11	Turbine Hose Stations	160	O/C	✓	Y☐ N☐	
12	Turbine Bearings	☑	O/C	✓	Y☐ N☐	Locked

Valve Shed # 2 by Overflow

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Expansion Vessel	160	O/C	✓	Y☑ N☐	
2	Deluge Area	160	O/C	✓	Y☑ N☐	
3	Deluge Structure	160	O/C	✓	Y☑ N☐	
4	Rack 1 Wildfire Area	160	O/C	✓	Y☑ N☐	
5	Overflow Tanks	160	O/C	✓	Y☑ N☐	
6	Rack 1 South Area	160	O/C	✓	Y☑ N☐	
7	Rack 1 West	160	O/C	✓	Y☑ N☐	
8	Rack 1 North Area	160	O/C	✓	Y☑ N☐	
9	Overflow AFFF	160	O/C	✓	Y☑ N☐	
10	Expansion Vessel AFFF	160	O/C	✓	Y☑ N☐	

Valve Shed # 3 by Bldg 35 GE Electrical Bldg

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Transformer A	160	O/C	✓	Y☑ N☐	
2	Transformer Main	160	O/C	✓	Y☑ N☐	

Valve Shed # 4 by Cooling Tower West Side

No.	System	PSI	Viv. Pos.	Signage		Comments
1	Cooling Tower West Side		O/C	✓	Y☐ N☑	

Valve Shed # 5 by Control Bldg 10

No.	System	PSI	Viv. Pos.	Signage	Locked	Comments
1	Control Room	155	O/C	✓	Y☑ N☐	
2	Offices	160	O/C	✓	Y☑ N☐	
3	Electrical Room	160	O/C	✓	Y☑ N☐	

Turbine Sprinkler Valves (These are to be locked in the open position)

No.	System	Locked	Viv. Pos.	Comments
1	Bearing 2	Y☑ N☐	O/C	
2	Bearing 3	Y☑ N☐	O/C	
3	Bearing 4	Y☑ N☐	O/C	
4	Bearing 5	Y☑ N☐	O/C	

HTF Deluge System Valves (To be Locked in the Open Position)

No.	System	Locked	Viv. Pos.	Comments
1	MP-201	Y☐ N☑	O/C	
2	MP-200A	Y☑ N☐	O/C	
3	MP-200B	Y☑ N☐	O/C	
4	MP-200C	Y☑ N☐	O/C	
5	MP-200D	Y☑ N☐	O/C	

Fire Pump House Deluge System

No.	System	PSI	O/C	Locked	Comments
1	Fire Pump House Deluge	160	O	Y☑ N☐	

PIV Checks

No.	System	Position	Cycled	Date Cycled	Comments
1	Warehouse/Maintenance Shop Drive Way #7	O/C			
2	Warehouse/Maintenance Shop Drive Way #5	O/C			
3	West Side Power Block by VS-3 # 9	O/C			
4	West Side Power Block by VS-1 # 10	O/C			
5	West Side Cooling Tower by VS-4 # 11	O/C			
6	West side Cooling Tower by VS-4 # 12	O/C			
7	N W Corner Chemical Storage #1	O/C			
8	N E Corner Chemical Storage # 2	O/C			
9	East side WT by Multimedia Filters # 3	O/C			
10	East Side WT by Multimedia Filters # 5	O/C			
11	North Side Bldg 10 # 6	O/C			
12	Between MP-444 s and Water Treat # 1	O/C			
13	Beta Only West Side Power Block Valve Shed 4	O/C			

To Be Cycled First Saturday of Every Month

No.	System	Details	Comments / Actions
1	Transformer Yard Refuse Check	Y☐ N☐	

Atlantica
Sustainable Infrastructure

Mojave Solar LLC

Emergency Diesel Generator Weekly Test Log

Plant: Beta **Date:** 1/19/25

Operator: Anthony

Main Generator Breaker		Comments
Open		
Closed		
Engine		**Comments**
Start Time:	2142	
Stop Time:	2152	
Total Run Time:	10 min	
Starting Hour Meter Reading	4.9	
Monthly Fuel Consumption(gal)	—	
Oil Level	Good	
Coolant Level		Coolant Temp. @ Start 51 °c Finish=74 °c
Belt Condition	Good	
Oil Pressure		Start = 0 bar Finish=6.9 bar
Battery Condition	Good	
Battery Voltage	27.1	
Engine RPMs	1800	
Generator		**Comments**
Generator Volts	4.18	
Generator Amps	—	
Generator "KVA"	—	
Reason For Use		**Comments**
Testing	✓	
Emergency	—	
Maintenance	—	
Generator		**Comments**
Fuel Delivered	—	
Fuel Level 1/4 1/2 3/4 F	4' —	
Sulfur Concentrations <0.0015% (15ppm)	—	

The Emergency Generator shall be limited to use for emergency power, as defined as in response to a fire or when utility back-feed power is not available. In addition, this unit shall be operated no more than 50 minutes during any hour and 50 hours per year for testing and maintenance excluding compliance source testing. There is no limit on engine operation for Emergency use. This engine may operate in response to notification of impending loss of utility back-feed power if the interconnected utility has ordered an outage to be taken or expects to order such outages at a particular time the engine is operated no more than 30 minutes prior to the forecasted outage and the engine is shut down immediately after the utility advises that the outage no longer imminent or in effect.

Note: fuel consumption 114.01 gal/h (431.57 l/h) of load approximately

Atlantica
Sustainable Infrastructure

Mojave Solar LLC

Emergency Diesel Generator Weekly Test Log

Plant: Beta **Date:** 1/27/25

Operator: Taylor

Main Generator Breaker		Comments
Open		
Closed		
Engine		**Comments**
Start Time:	1817	
Stop Time:	1827	
Total Run Time:	10 min	
Starting Hour Meter Reading	00005.1	
Monthly Fuel Consumption(gal)		
Oil Level	Good	
Coolant Level	Good	Coolant Temp. @ Start 50 °c Finish= 75 °c
Belt Condition	Good	
Oil Pressure		Start = 8.5 bar Finish= 6.6 bar
Battery Condition	Good	
Battery Voltage	27.2	
Engine RPMs	1800	
Generator		**Comments**
Generator Volts	0.96	
Generator Amps		
Generator "KVA"	4.17	
Reason For Use		**Comments**
Testing	✓	
Emergency		
Maintenance		
Generator		**Comments**
Fuel Delivered		
Fuel Level 1/4 1/2 3/4 F	3/4	
Sulfur Concentrations <0.0015% (15ppm)		

This Emergency Generator shall be limited to use for emergency power, as defined as in response to a fire or when utility back-feed power is not available. In addition, this unit shall be operated no more than 30 minutes during any hour and 50 hours per year for testing and maintenance excluding compliance source testing. There is no limit on engine operation for Emergency use. This engine may operate in response to notification of impending loss of utility back-feed power if the interconnected utility has ordered an outage to the plant or expects to order such outages at a particular time. The engine is operated no more than 30 minutes prior to the anticipated outage and the engine is shut immediately after the utility advises that the outage is no longer imminent or in effect.

Note: Fuel consumption 114.0 gal/h (431.53 l/h) of load approximately.

Atlantica
Sustainable Infrastructure

Mojave Solar LLC

Emergency Diesel Generator Weekly Test Log

Plant: Beta **Date:** 1/27/25

Operator: Taylor Scala

Main Generator Breaker		Comments
Open		
Closed	✓	
Engine		**Comments**
Start Time:	1817	1/27/25
Stop Time:	0421	1/28/25
Total Run Time:	10h4min	
Starting Hour Meter Reading	5.1	end 15.2 hours
Monthly Fuel Consumption(gal)		
Oil Level	✓	
Coolant Level	✓	Coolant Temp. @ Start 50 °c Finish= 74°c
Belt Condition	✓	
Oil Pressure	✓	Start = 8.5 bar Finish= 6.6 bar
Battery Condition	✓	
Battery Voltage	27.2	
Engine RPMs	1800	
Generator		**Comments**
Generator Volts	4.17	
Generator Amps	—	
Generator "KVA"	—	
Reason For Use		**Comments**
Note: Record the run times during the emergency and the outages as an emergency hour.		
Testing and Maintenance- 50Hr/Yr.		
Emergency- Unlimited Hours	✓	Power Line work
Generator		**Comments**
Fuel Delivered		
Fuel Level 1/4 1/2 3/4 (F)		
Sulfur Concentrations <0.0015% (15ppm)		

This Emergency Generator shall be limited to use for emergency power, as defined as in response to a fire or when utility back-feed power is not available. In addition, this unit shall be operated no more than 30 minutes during any hour and 50 hours per year for testing and maintenance excluding compliance source testing. There is no limit on engine operation for Emergency use.This engine may operate in response to notification of impending loss of utility back-feed power if the interconnected utility has ordered an outage to the plant or expects to order such outages at a particular time the engine is operated no more than 30 minutes prior to the forecasted outage and the engine is shut immediately after the utility advises that the outage no longer imminent or in effect.

Note: Fuel consumption 114.01 gal/h (431.57 l/h) of load approximately.

Atlantica
Sustainable Infrastructure

Mojave Solar LLC

Emergency Diesel Generator Bi-Hourly Readings

Plant: Beta | Operator: Taylor | Date: 1/27/25

Time	Oil Psi.	Gen Voltage	Engine RPM	Coolant Temp.	Fuel Level	Hour Meter	Oil Temp	Gen. KwH	Batt. Volts
1817	8.5	0.96	1800	50	100	00005.1	47	4.17	27.2
2017	6.6	0.89	1800	75	4' 9½"	00007.2	73	4.18	27.5
2217	6.6	0.95	1800	75	3½' 6½"	00009.2	73	4.18	27.6
0017	6.6	0.96	1800	74	3½' 5½"	00012.2	73	4.17	27.6
0217	6.6	0.95	1800	74	3' 3"	00015.2	73	4.18	27.6
0417	6.6	0.96	1800	74	3' 1½"	00015.2	73	4.17	27.6

Comments: 1837 Alarm for overPower Pre-Alarm max 0900 Kw