

<b>DOCKETED</b>	
<b>Docket Number:</b>	08-AFC-03C
<b>Project Title:</b>	Marsh Landing Generating Station Compliance
<b>TN #:</b>	269363
<b>Document Title:</b>	2025 Marsh Landing Compliance Report - Part 1 of 3
<b>Description:</b>	Annual Compliance Report for the Commercial Operations period, January 1st – December 31st, 2025. This includes documents required for the following specific conditions: BIO-2, HAZ-1, HAZ-8, SOIL & WATER-5, SOIL & WATER-6, VIS-1, VIS-2, WASTE-7, and BIO-8.
<b>Filer:</b>	Rena Eddy
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	3/30/2026 9:01:18 AM
<b>Docketed Date:</b>	3/30/2026



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March 26, 2026

Mr. Anwar Ali, Ph.D.  
Compliance Project Manager  
California Energy Commission  
1516 Ninth Street (MS-2000)  
Sacramento, CA 95814-5512

Subject: Annual Compliance Report – 2025  
(COMPLIANCE-7)  
Docket No. 08-AFC-03

Mr. Ali,

Marsh Landing Generating Station achieved Commercial Operation status on May 1, 2013. The legal name of the plant is Marsh Landing LLC. The plant is owned by Clearway Energy Inc. and operated and maintained by NRG Energy Services.

Per the requirements of Revised Staff Assessment please find enclosed a copy of the Annual Compliance Report for the Commercial Operations period, January 1<sup>st</sup> – December 31<sup>st</sup>, 2025. This includes documents required for the following specific conditions: BIO-2, HAZ-1, HAZ-8, SOIL & WATER-5, SOIL & WATER-6, VIS-1, VIS-2, WASTE-7, and BIO-8.

This information is being submitted to comply with the requirements of the Energy Commission's Final Decision for this project.

Please let me know if you have any questions.  
(925-324-3533 or David.Frandsen@nrg.com)

Sincerely,

*David Frandsen*

David Frandsen  
MLGS Compliance Manager

Enclosures:  
1 Electronic copy on Memory Drive of ACR 2025

# Annual Compliance Report

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**Marsh Landing Generating Station**  
**Annual Compliance Report**

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**1.0 Current Compliance Matrix**

Color Code Key:

Pre-Const	Construction	Commiss.	Operations	To CEC or Agency	Approved by CEC
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Sort Code	Cond. #	Description of Project Owner's Responsibilities	Verification/Action/Submital Required by Project Owner	Timeframe	Date Due to CEC CPM	Lead Party	Date sent to CEC, CBO or agency	CEC Log # and Status	Comments	Date Submitted to GenOn	Date sent to CEC, CBO or agency2	Approved	CPM	CBO	Other	Responsible Party
COMM	AQ-1	Minimize emissions of carbon monoxide and nitrogen oxides from Gas Turbines to the maximum extent possible during the commissioning period.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSCB).	Quarterly	30 days after end of quarter	GenOn										Tom Bertolini
COMM	AQ-2	At the earliest feasible opportunity in accordance with the recommendations of the equipment manufacturers and the construction contractor, shall tune the S-1, S-2, S-3 and S-4 Gas Turbines combustors to minimize the emissions of carbon monoxide and nitrogen oxides.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSCB).	Quarterly	30 days after end of quarter	K & N							CPM		AQMD	Tom Bertolini
COMM	AQ-3	At the earliest feasible opportunity in accordance with the recommendations of the equipment manufacturers and the construction contractor, install, adjust, and operate the A-1, A-3, A-5 and A-7 Oxidation Catalysts and A-2, A-4, A-6 and A-8 SCR Systems to minimize the emissions of carbon monoxide and nitrogen oxides from S-1, S-2, S-3, and S-4 Gas Turbines. (Basis: BACT, Regulation 2, Rule 2, Section 409)	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSCB).	Quarterly	30 days after end of quarter	K&G									AQMD	Doug King Randy Dixon
COMM	AQ-4	Submit a plan to the District Engineering Division and the CEC CPM, describing the procedures to be followed during the commissioning of the gas turbines. The plan shall include a description of each commissioning activity, the anticipated duration of each activity in hours, and the purpose of the activity. The activities described shall include, but not be limited to, the tuning of the Dry-Low-NOx combustors, the installation and operation of the required emission control systems, the installation, calibration, and testing of the CO and NOx continuous emission monitors, and any activities requiring the firing of the GT without abatement by their respective oxidation catalysts and/or SCR Systems. Do not fire any of the Gas Turbines sooner than 28 days after the District receives the commissioning plan.	Submit a commissioning plan to the CPM and APCO for approval at least four weeks prior to first firing of the gas turbine describing the procedures to be followed during the commissioning period and the anticipated duration of each commissioning activity.	Four weeks prior to first firing of GT during Commissioning	10/14/12	KIEWIT	10/17/12 Submittal 135								AQMD	Doug King
COMM	AQ-5	During the commissioning period, shall demonstrate compliance with AQ-7, AQ-8, AQ-9, and AQ-10 through the use of properly operated and maintained continuous emission monitors and data recorders for the following parameters and emission concentrations: firing hours, fuel flow rates, stack gas nitrogen oxide emission concentrations, stack gas carbon monoxide emission concentrations, stack gas oxygen concentrations. The monitored parameters shall be recorded at least once every 15 minutes (excluding normal calibration periods or when the monitored source is not in operation) for the Gas Turbines (S-1, S-2, S-3, and S-4). The owner/operator shall use District-approved methods to calculate heat input rates, nitrogen dioxide mass emission rates, carbon monoxide mass emission rates, and NOx and CO emission concentrations, summarized for each clock hour and each calendar day. The owner/operator shall retain records on site for at least 5 years from the date of entry and make such records available to District personnel upon request. (Basis: Regulation 2, Rule 2, Section 419)	Submit to the CPM and APCO for approval the commissioning plan as required in AQ-4.	Four weeks prior to first firing of GT during Commissioning	10/14/12	KIEWIT	10/17/12 Submittal 135								AQMD	Doug King
COMM	AQ-7	Do not fire Gas Turbine without abatement of nitrogen oxide emissions by the corresponding SCR System and/or abatement of carbon monoxide emissions by the corresponding Oxidation Catalyst for more than 232 hours each during the commissioning period. The owner/operator shall operate the facility such that simultaneous commissioning of no more than two gas turbines will occur without abatement of nitrogen oxides and carbon monoxide by its SCR system and oxidation catalyst system. Such operation of any Gas Turbine without abatement shall be limited to discrete commissioning activities that can only be properly executed without the SCR system and/or oxidation catalyst in place. Upon completion of these activities, provide written notice to the District Engineering and Enforcement Divisions and the unused balance of the 232 firing hours without abatement shall expire.	Submit to the CPM and APCO for approval the commissioning plan as required in AQ-4. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SCB).	Four weeks prior to first firing of GT during Commissioning	10/14/12	KIEWIT	10/17/12 Submittal 135		Awaiting Approval BAAQMD	Per					AQMD	Doug King
COMM	AQ-10	Within 90 days after startup of each turbine, the Owner/Operator shall conduct District and CEC approved source tests for that turbine to determine compliance with the emission limitations specified in AQ-17. The source tests shall determine NOx, CO, and POC emissions during start-up and shutdown of the gas turbines. The POC emissions shall be analyzed for methane and ethane to account for the presence of unburned natural gas. The source test shall include a minimum of three start-up and three shutdown periods. Thirty working days before the execution of the source tests, the Owner/Operator shall submit to the District and the CEC Compliance Program Manager (CPM) a detailed source test plan designed to satisfy the requirements of this Part. The District and the CEC CPM will notify the Owner/Operator of any necessary modifications to the plan within 20 working days of receipt of the plan; otherwise, the plan shall be deemed approved. The Owner/Operator shall incorporate the District and CEC CPM comments into the test plan. The Owner/Operator shall notify the District and the CEC CPM within seven (7) working days prior to the planned source testing date. The owner/operator shall submit the source test results to the District and the CEC CPM within 60 days of the source testing date. (Basis: Regulation 2, Rule 2, Section 419).	Submit to the CPM and APCO for approval the commissioning plan as required in AQ-4.	Thirty working days before the execution of the source tests	10/14/12	KIEWIT	10/17/12 CEC Submittal 135 Planned Source Testing dates, 2/25/13 CEC Submittal 151 Update of planned Source Testing dates, 6/25/13 CEC Submittal 164 Source Test Report Submitted								AQMD	Doug King

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COMM	AQ-27a	Conduct a District-approved source test on each corresponding exhaust points to determine the corrected ammonia (NH3) emission concentration to determine compliance with AQ-17(6). The source test shall be conducted over the expected operating range of the turbine (including, but not limited to, minimum and full load modes) to establish the range of ammonia injection rates necessary to achieve NOx emission reductions while maintaining ammonia slip levels.	Submit the results and field data collected during source tests to the District and CPM within 60 days of testing and according to a preapproved protocol (AQ-29).	Within 60 days of initial source testing	4/1/11	NRG	6/25/13 CEC Submittal 164 Source Test Report								Amended May 21, 2021	Doug King
COMM	AQ-30a	conduct a District-approved source test on one of the following exhaust points P-1, P-2, P-3 or P-4 while the Gas Turbine is operating at maximum allowable operating rates to demonstrate compliance with AQ-23. The owner/operator shall also test the gas turbine while it is operating at minimum load. If three consecutive biennial source tests demonstrate that the annual emission rates calculated pursuant to AQ-26 for any of the compounds listed below are less than the BAAQMD trigger levels, pursuant to Regulation 2, Rule 5, shown, then the owner/operator may discontinue future testing for that pollutant. Benzene ≤ 2.9 pounds/year and 0.06 pounds/hour, Formaldehyde ≤14 pounds/year and 0.12 pounds/hour, Specified PAHs ≤ 0.0033 pounds/year.	The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a preapproved protocol (AQ-29).	Within 60 days of initial source testing	4/1/11	KIEWIT	6/25/13 Submittal 164 Source Test Report Submitted								Amended February 2019	Doug King
COMM	AQ-32a	Conduct a District-approved source test on two of the four exhaust points while each gas turbine is operating at maximum heat input rates to demonstrate compliance with the SAM emission rates specified in AQ-33. Test for (as a minimum) SO2, SO3, and H2SO4. Submit the source test results to the District and the CEC CPM within 60 days of conducting the tests. (Basis: Regulation 2, Rule 2, Section 406227, and Regulation 2, Rule 2, Section 449409)	Submit the results and field data collected during source tests to the District and CPM within 60 days of testing and according to a preapproved protocol (AQ-29).	Within 60 days of initial source testing and	4/1/11	KIEWIT	6/25/13 Submittal 164 Source Test Report Submitted								AQMD	Doug King
COMM	AQ-41	Commissioning Activities for Black Start Capability: The owner/operator shall perform commissioning activities for black start capability at S-3 and S-4 for no more than 94 hours combined. Upon completion of these activities, the owner/operator shall provide written notice to the District, Engineering and Enforcement Divisions.	The project owner shall submit to the CPM the commissioning report to demonstrate the compliance of this condition within 30 days from the completion of black start capability commissioning.	Black Start Commissioning	30 days after end of commissioning	NRG			Add with Black Start Amendment February 2019						Amended February 2019	
COMM	AQ-42	Emission Limits for Commissioning Activities for Black Start Capability: The owner/ operator shall not operate Gas Turbines S-3 and S-4 in a manner such that the combined pollutant emissions from these sources exceeds the following limits when performing commissioning activities for black start capability. NOx (as NO2)..... 3,311 pounds; CO..... 103,486 pounds; POC (as CH4)..... 8,089 pounds; PM10/PM2.5..... 123 pounds; SO2..... 84 pounds.	The project owner shall submit to the CPM the commissioning report to demonstrate the compliance of this condition within 30 days from the completion of black start capability commissioning.	Black Start Commissioning	30 days after end of commissioning				Add with Black Start Amendment February 2019						Amended February 2019	
COMM	AQ-43	AQ-43 When performing any commissioning activities for black start capability at S-3 and S-4, the owner/operator of the MLGS shall demonstrate compliance with conditions AQ-41 and AQ-42 through the use of properly operated and maintained continuous emission monitors and data recorders for the following parameters: -firing hours -fuel flow rates -stack gas nitrogen oxide emission concentrations -stack gas carbon monoxide emission concentrations -stack gas oxygen concentrations. The owner/operator shall use District-approved methods to calculate heat input rates, nitrogen dioxide mass emission rates, carbon monoxide mass emission rates, and NOx and CO emission concentrations, summarized for each clock hour. The owner/operator shall retain records on site for at least 5 years from the date of entry and make such records available to District personnel upon request.	The project owner shall submit to the CPM a commissioning report to demonstrate compliance with this condition within 30 days after the completion of black start capability commissioning.	Black Start Commissioning	30 days after end of commissioning				Add with Black Start Amendment February 2019						Amended February 2019	
COMM	NOISE-4a	Project design will include noise mitigation measures to ensure that noise levels due to operation of the project alone will not exceed an hourly average of 54 dBA at or near LT-1 and 45 dBA at or near LT-2. No single piece of equipment shall be allowed to stand out as a source of noise that draws legitimate complaints.	Conduct a community noise survey at monitoring location LT-1, LT-2, or at a closer location acceptable to the CPM. This survey during the power plant's full-load operation shall also include measurement of one-third octave band sound pressure levels. Conduct a survey of noise at monitoring locations.	Within 30 days of project's first achieving a sustained output of 85% or greater of rated capacity	1/22/12	KIEWIT	7/8/13 CEC Submittal 167									Jake Albers Jason Lockwood
COMM	NOISE-4b	Submit a summary report of the survey to the CPM. Included in the survey report shall be a description of any additional mitigation measures necessary to achieve compliance with the above listed noise limit, and a schedule, subject to CPM approval, for implementing these measures. When these measures are in place, the project owner shall repeat the noise survey.	Submit required info to the CPM.	Within 15 days after completing noise survey	2/6/12	KIEWIT	7/8/13 CEC Submittal 167									Jake Albers Jason Lockwood
COMM	NOISE-5	Conduct an occupational noise survey to identify the noise hazardous areas in the facility when plant reaches 85% of rated capacity or greater	Prepare a report of the survey results and, if necessary, identify proposed mitigation measures that will be employed to comply with the applicable California and federal regulations.	Within 30 days after completing survey	2/21/12	KIEWIT	7/8/13 CEC Submittal 168									Doug King
COMM	WASTE-7a	Prepare an Operation Waste Management Plan for all wastes generated during operation of the facility	Submit the plan to the CPM for review and approval. The plan shall contain, at a minimum the items in the condition, submit any required revisions to the CPM within 20 days of notification from the CPM that revisions are necessary.	No less than 30 days prior to the start of project operation	11/23/11	GenOn	Submittal 152 sent to the CEC on 3/2/13				3/2/2013					Diane Griffin
COMM	WORKER SAFETY-2	Prepare and submit an O&M Safety & Health Plan containing: an IIPP, EAP, HMMP, FPP, and PPE.	The Operations IIPP, EAP, PPE shall be submitted to the CEC CPM for review and comment; the EAP and FPP shall also be submitted to the CCC Fire Protection District for review and comment. Provide a copy of a letter to the CPM from the CCC Fire Protection District stating the fire department's comments on the Operations Fire Prevention Plan and Emergency Action Plan.	At least 30 days prior to first fire or commissioning	9/7/12	GenOn	10/9/12 Submittal 132 10/10/12 Submittal 133								Contra Costa County Fire Protection District	Margie Hansen Diane Griffin



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CONS	AQ-34	Ensure that the stack height of emission points are each at least 165 feet above grade level at the stack base	Make the site available for inspection by representatives of the District, ARB and the Commission	As Required	As required	GenOn			Kiewit to provide per email from Jason Lockwood 10.19.12							Randy Dixon
CONS	AQ-38	Provide adequate stack sampling ports and platforms to enable the performance of source testing. The location and configuration of the stack sampling ports shall comply with the District Manual of Procedures, Volume IV, Source Test Policy and Procedures, and shall be subject to BAAQMD review and approval, except that the facility shall provide four sampling ports that are at least 6 inches in diameter in the same plane of each gas turbine stack.	The project owner shall make the site available for inspection by representatives of the District, ARB and the Commission.	As Required	As required	GenOn			Kiewit to provide per email from Jason Lockwood 10.19.12							Randy Dixon
CONS	AQ-39	Contact the BAAQMD Technical Services Division regarding requirements for the continuous emission monitors, sampling ports, platforms, and source tests required by AQ-10, AQ-27, AQ-28, AQ-30 and AQ-32. Conduct all source testing and monitoring in accordance with the District approved procedures.	Contact the District for specifications on monitors, ports, platforms and source tests and shall submit verification of this contact to the District and CPM with the initial source test protocol	With in 180 days of issuance of the Authority to Construct	9/25/11	KIEWIT	9/13/2011 Submittal 061 Approved by CEC 10/7/2011 Additional submittal 10/11/2011 Submittal 068		Approval received from BAAQMD bt letter from Ken Kusaniec Air Quality Engineering Manager Dated 4/21/2011		10/11/2012 Submittal of BAAQMD Letter only No CEC Approval required.			N/A	AGMD	Tori Logan
CONS	BIO-2	Ensure that the DB performs the specified 1. through 9. of the condition during any site (or related facilities) mobilization, ground disturbance, grading, construction, operation, and closure activities. The DB may be assisted by the approved Biological Monitor(s), but remains the contact for the project owner and CPM.	Designated Biologist must maintain written records of the tasks described in condition and provide summaries for inclusion in the MCR.	Monthly	Include in MCR	BIOLOGIST					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Stephen L. Erickson
CONS	BIO-3	Construction/Operation Manager shall act on the advice of the DB to ensure conformance with the biological resources Conditions of Certification. If required by the DB, Construction/ Operation Manager shall halt all activities in areas specified by the DB. The Designated Biologist shall follow the process 1. through 3 in the condition if construction is halted	Designated Biologist must notify the CPM immediately of any non-compliance activity or halt of any site mobilization, ground disturbance, grading, construction, and ops activities.	As Required	As required	BIOLOGIST										Stephen L. Erickson
CONS	BIO-4b	Report 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.	Include a running total in MCR.	Monthly	Include in MCR	KIEWIT			Current as of MCR 24		Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Raja Ponniah
CONS	BIO-5b	Revise or supplement the BRMIMP to reflect any BIO permit conditions received after the original BRMIMP is accepted.	Submit any bio permits not yet received when the BRMIMP is first submitted to the CPM and HTAC	Within 5 days of receipt	As required	BIOLOGIST	Submittal 020 Submittal 030					Verified Monthly in MCR's in sections 2.04 and 2.06				Stephen L. Erickson
CONS	BIO-5c	Any changes to the approved BRMIMP must also be approved by the CPM and submitted to the HTAC to ensure no conflicts exist.	Notify the CPM before implementing any modifications to the approved BRMIMP	Within 5 days	As required	BIOLOGIST						Verified Monthly in MCR's in sections 2.04 and 2.06				Stephen L. Erickson
CONS	BIO-5d	Implementation of BRMIMP measures will be reported in the MCR by the DB.	Provide report for inclusion in MCR.	Monthly	Include in MCR	BIOLOGIST					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Dawn Owens
CONS	BIO-5e	Prepare a written construction closure report identifying which items of the BRMIMP have been completed, a summary of all modifications to mitigation measures made during the project's site mobilization, ground disturbance, grading, and construction phases, and which mitigation and monitoring items are still outstanding.	Provide construction closure report to the CPM for review and approval.	Within 30 days after completion of construction	1/28/12	BIOLOGIST			Submittal #172		8/14/2013					Stephen L. Erickson



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CONS	BIO-6a	Implement measures set forth in condition in a manner to avoid or minimize impacts to the local biological resources.	Provide report for inclusion in MCR.	Monthly	Include in MCR	BIOLOGIST					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Stephen L. Erickson
CONS	BIO-6b	Submit a written construction termination report identifying how bio mitigation measures have been completed.	Provide construction termination report to the CPM for review and approval. Provide additional copies to the CDFG and USFWS.	Within 30 days after completion of construction	1/28/12	BIOLOGIST			Submittal #172		8/14/2013					Stephen L. Erickson
CONS	CIV-2	RE shall stop all earthwork and construction in the affected areas when the responsible soils, geotechnical, or civil engineer experienced and knowledgeable in the practice of soils engineering identifies unforeseen adverse soil or geologic conditions. Submit modified plans, specifications and calculations to the CBO based on these new conditions. Obtain approval from the CBO before resuming earthwork and construction in affected area.	Notify the CPM within 24 hours when earthwork and construction are stopped as a result of unforeseen adverse geological 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.	Within 24 hours of construction halt due to geologic conditions	As required	KIEWIT										Gene Amrhein
CONS	CIV-3	Perform inspections in accordance with this condition (see codes referenced). If work is not being performed in accordance with approved plans, the discrepancies shall be reported immediately to the RE, CBO and CPM. EPC must prepare a written report detailing all discrepancies, non-compliance items, and proposed corrective action to the CBO/CPM.	RE shall transport to the CBO and CPM a NCR and the proposed corrective action for review and approval. Within 5 days of resolution, EPC must submit details of correction action to the CBO and CPM.	Within 5 days of discovery of any discrepancies	As required	KIEWIT	9/2/2011 Submittal 069 9/13/2011 Submittal 061 9/23/2011 Submittal 063 10/14/2011 Submittal 070 10/17/2011 Submittal 071 10/24/2011 Submittal 073 2/10/2012		9/2/2011 Submitted NCR-001, 9/13/2011 Submitted NCR-2,3,4 9/23/2011 Submitted NCR-5 Submitted additional information for NCR 384 10/14/2011 Submitted additional information for NCR 2 10/17/2011 Additional information for NCR 5 10/24/2011			All relevant NCR's are closed(Verified on NCR log) and submitted. No approvals are required from CEC				Gene Amrhein
CONS	CIV-4	After completion of finished grading and erosion and sedimentation control and drainage facilities, the Project Owner shall obtain the CBO's approval of the final "as-graded" grading plans and final "as-built" plans for the erosion and sedimentation control facilities.	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 final approved plans.	Within 30 days of completion of work	1/28/12	KIEWIT			Submittal # 175		10/23/013					Kyle Stuckenholtz
CONS	CUL-1b	Submit the resume of the proposed new CRS to the CPM for review and approval. Also provide the new CRS with copies of the AFC, data responses, confidential reports, and maps and drawings showing the footprint of the power plant and all linear facilities.	Provide the required written documentation to the CPM.	At least 10 days prior to a termination or release of the CRS or within 10 days after the resignation of a CRS	As required	GenOn	9/20/12 Submittal 129		10/4/2010 Approval 10/12/2011 Approval of Ms. Karin Beck as an Alternate 2/14/2012		Revision submitted 9/20/2012	CEC Acceptance resumes on 10/5/2010 verified by email from J Caswell (On File) Additionally verified by implied acceptance of section 4.0 of MCR's No.2				Stephen L. Erickson
CONS	CUL-1d	Submit the resumes of the technical specialists to the CPM for review and approval.	Provide the required written documentation to the CPM.	At least 10 days prior to technical specialists beginning new tasks	As required	CULTURAL SPECIALIST	9/13/2011 Submittal 061 Approved by CEC 10/7/2011 Additional submittal 10/11/2011					No. 4 of MCR No. 19 resumes on 10/5/2010 verified by email from J Caswell (On File) Additionally verified by implied acceptance of section 4.0 verified MCR No.5 2/11/2011				Stephen L. Erickson
CONS	CUL-2b	Provide to the CRS and CPM a schedule of project activities for the following week, including the identification of area(s) where ground disturbance will occur during that week.	On a weekly basis during ground disturbance, a current schedule of anticipated project activity shall be provided to the CRS and CPM by letter, e-mail, or fax.	Weekly during construction	Weekly	KIEWIT			Current as of MCR 25			Verified by weekly Email notices				Raja Ponniah

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CONS	CUL-4a	If any archaeological monitoring or data recovery activities are conducted during project construction, submit a final Cultural Resources Report (CRR).	Provide the required written documentation to the CPM for review and approval.	Within 90 days after completion of landscaping	3/28/12	CULTURAL SPECIALIST			Submittal # 173		9/4/2013					Stephen L. Erickson
CONS	CUL-4b	If cultural materials requiring curation were collected, provide to the CPM a copy of an agreement or other written commitment form.	Provide the required written documentation to the CPM.	Within 90 days after completion of landscaping	3/28/12	CULTURAL SPECIALIST			Confirmation email		9/4/2013					Stephen L. Erickson
CONS	CUL-4c	Provide documentation to the CPM confirming that copies of the final CRR have been provided to the SHPO, the CHRIS, the curating institution, if archaeological materials were collected, and to the Tribal Chairpersons of any Native American groups requesting copies of project-related reports.	Provide the required written documentation to the CPM.	Within 10 days after CPM approval of CRR	CEC Dependant	CULTURAL SPECIALIST										Stephen L. Erickson
CONS	CUL-4d	If the project is suspended, submit a draft CRR to the CPM for review and approval.	Provide the required written documentation to the CPM for review and approval.	Within 30 days after requesting a suspension	As required	CULTURAL SPECIALIST			Project is not suspended							Stephen L. Erickson
CONS	CUL-5b	Provide the WEAP Training Acknowledgement forms of workers who have completed the training in the prior month and a running total of all persons who have completed training to date.	Include a running total in MCR.	Monthly	Include in MCR	KIEWIT					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Raja Ponniah
CONS	CUL-6a	Ensure that CRS, alternate CRS or CRMs monitor full time all ground disturbances at project site along the linear facilities routes, and laydown areas, roads, and other ancillary areas. And Ensure that the CRMs kee a daily log of any monitoring	As long as no cultural resources are found, Provide daily a statement that "no cultural resources over 50 years of age were discovered" to the CPM as an e-mail	Daily	Daily	CULTURAL SPECIALIST						Verified in Monthly reports in section 2.12. Requirement complete with suspension. Approval received per teleconference and verified by email 9.14.12				Stephen L. Erickson
CONS	CUL-6b	Submit monthly monitoring summary reports of cultural resources related monitoring, created by the CRS as required by the condition.	Include in each MCR a copy of the monthly summary report of cultural resources-related monitoring prepared by the CRS and attach any new DPR 523 A forms completed	Monthly	Include in MCR	CULTURAL SPECIALIST					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Dawn Owens
CONS	CUL-6c	Notify CEC prior to changing or eliminating monitoring.	Provide letter or email to CPM for review and approval detailing justification for changing or eliminating monitoring.	At least 24 hours prior to changing level	As required	CULTURAL SPECIALIST	9/10/12 Submittal 123		Notice given Submittal 123			Requirement complete with suspension. Approval received per teleconference and verified by email 9.14.12				Stephen L. Erickson
CONS	CUL-6d	A Native American monitor shall be obtained to monitor ground disturbance in areas and at depths, if any, where the CUL-1 geoaerchaeological study identified the potential for buried prehistoric archaeological deposits and anywhere else that if Native American artifacts are encountered during ground disturbance.	Provide the required written documentation to the CPM.	No later than 30 days after discovery	As required	CULTURAL SPECIALIST			As Required in Monthly Reports included in section 2.12		As Required in Monthly Reports included in section 2.12	Requirement complete with suspension. Approval received per teleconference and verified by email 9.14.12				Stephen L. Erickson
CONS	CUL-6e	Submit any comments or information provided by Native Americans in response to the project owner's transmittals of information.	Provide the required written documentation to the CPM.	Within 15 days of receipt	As required	GenOn			As Required in Monthly Reports included in section 2.12		As Required in Monthly Reports included in section 2.12	Requirement complete with suspension. Approval received per teleconference and verified by email 9.14.12				Stephen L. Erickson
CONS	CUL-7b	Ensure the CRS notifies all Native American groups that expressed a desire to be notified in the event of a discovery and complete a DPR 523 forms as specified in the condition	Unless discovery is treated prescriptibly, Submit completed DPR 523 forms to CPM for review and approval	Within 24 hours of discovery (48 to notify Native American groups)	As required	CULTURAL SPECIALIST			Nothing required at this time			Verified in Monthly reports in section 2.12. Requirement complete with suspension. Approval received per teleconference and verified by email 9.14.12				Stephen L. Erickson
CONS	CUL-8	If soils must be acquired from a non commercial borrow site, the CRS shall survey the borrow site for cultural resources and record on DPR 523 forms and that are identified and convey the results and recommendation for further action to the CPM	Notify the CRS and CPM as soon as it is known that non commercial borrow site will be used and provide documentation of previous archaeological surveys. If none available site must be surveyed 30 days before any soil borrow activities and submit the survey and recommendation to the CPM.	At least 30 days prior to start of construction of each non commercial site borrow activities	As required	CULTURAL SPECIALIST			Nothing required at this time			Verified in Monthly reports in section 2.12. Requirement complete with suspension. Approval received per teleconference and verified by email 9.14.12				Stephen L. Erickson
CONS	ELEC-3	Prior to the start of any increment of electrical construction for electrical equipment and systems 480 volts and higher, with the exception of underground duct work and any physical layout drawings and drawings not related to code compliance and life safety, submit for CBO design review and approval the proposed final design, specifications and calculations.	Submit to the CBO for design review and approval the items listed in this condition	At least 30 days prior to start of construction of each increment of electrical construction	As required	KIEWIT			Nothing required at this time			Verified in Monthly reports in section 2.13.				Tharu Nadarajah
CONS	GEN-1	Design, construct, and inspect the project in accordance with the codes listed in the condition.	The project owner shall submit to the CPM and the CBO 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. The project owner shall provide the CPM a copy of the certificate of occupancy within 30 days of receipt from the CBO.	Five (5) days prior to requesting the issuance of the certificate of occupancy	2/24/13	KIEWIT										Mike Rinehart

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CONS	GEN-2b	Furnish the CPM and the CBO with an updated schedule of facility design submittals	Provide schedule updates in the monthly compliance report	Monthly	Include in MCR	KIEWIT					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Sarah Copeland
CONS	GEN-3	Make payments to the CBO for design review, plan check and construction inspections based upon a reasonable fee schedule to be negotiated between NCPA and the CBO.	Send copy of CBO's receipt of payment to CPM in next MCR indicating applicable fees have been paid.	Monthly	Include in MCR	GenOn					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Chuck Hicklin
CONS	GEN-6	Assign to the project, qualified and certified special inspector(s) who shall be responsible for the special inspections required by the 2007 CBC.	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	At least 15 days prior to start of an activity requiring special inspection	As required	KIEWIT	To CBO 2/2/11 Sent to CE 9/23/2011 Submittal 064 Submittal 065		CBO Approved 2-24-11 9/23/2011 Sent Quisals to CEC for Jay Locatelli, Micah Ek, Jeffrey Brooks, Jason Burris, Ryan Doyal, and Laura Johnson. Also sent CBO approvals for Jahn Sasser, Stanley Silva, and Anselmo De Haro. CEC approval 10/5/11.	2/2/11	2/24/2011 Verified MCR No.7 4/16/2011		2/24/2011		Dennis Chambers	
CONS	GEN-7	If any discrepancy in design and/or construction is discovered in any engineering work that has undergone CBO design review and approval, the project owner shall document the discrepancy and recommend required corrective actions.	Transmit a copy of the CBO's approval of any corrective action taken to resolve a discrepancy to the CPM in the next monthly compliance report. If any corrective action is disapproved, the project owner shall advise the CPM, within five days, of the reason for disapproval and the revised corrective action to obtain CBO's approval.	Monthly	Include in MCR	KIEWIT					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Gene Amrhein to communicate any CBO issues back to KC.
CONS	GEN-8	Obtain the CBO's final approval of all completed work that has undergone CBO design review and approval. Request the CBO to inspect the completed structure and review the submitted documents. Notify the CPM after obtaining the CBO's final approval. Retain one set of approved engineering plans, specifications, and calculations (including all approved changes) at the project site or at another accessible location during the operating life of the project. Electronic copies of the approved plans, specifications, calculations, and marked-up as-builts shall be provided to the CBO for retention by the CPM.	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 any work	As required Include in MCR	KIEWIT			Submittal as available in Monthly reports in Section 2.20			Currently No noted issues with any Monthly report				Raja Ponniah
CONS	HAZ-2	Concurrently provide and updated Business Plan, and updated Spill Prevention Control, and Countermeasure Plan, and an updated Risk Management Plan to CCHSD-HMP) and the CPM for review. Reflect all changes in doc and provide copies to CCHSD-HMP, CCCFPD and the CPM	Provide a copy of the final updated Business Plan and Updated SPCC plan to CPM for approval. Provide the final RMP to CCHSD-HMP and the CCCFPD for information and to the CPM for approval	At least 30 days prior to receiving any hazardous material on site	10/14/12	GenOn	7/11/12 Submittal 111 8/17/12 Submittal 118 9/17/12 Submittal 126		Draft RMP sent to the CEC on 7/11/2012 Updated construction SPCC and HMBP plans submitted to the CEC. 8/17/2012	9/17/12		Per teleconference on 8/23/12 Kiewit plan is acceptable through construction CEC agrees that all HAZ submittals made to date have been approved excepting HAZ-8 per email verification 8/24/12			CCHSD-HMP and CCCFPD	Diane Griffin
CONS	HAZ-3	Develop and implement a Safety Management Plan (SMP) for the delivery of aqueous ammonia and other liquid hazmat by tanker truck.	Submit the plan to the CPM for review and approval.	At least 30 days prior to delivery of any hazardous material to the facility	9/30/12	GenOn	10/9/2012 Submittal 131					CEC agrees that all HAZ submittals made to date have been approved excepting HAZ-8 per email verification 8/24/12				Tom Bertolini
CONS	HAZ-4	Design ammonia storage facility to either ASME Pressure Vessel Code and ANSI K61.6 or to API 620. Tanks shall be protected by a secondary containment basin capable of holding 125% of the storage volume	Submit final design drawings and specifications for the ammonia storage tank and secondary containment basin to the CPM for review and approval	At least 60 days prior to delivery of aqueous ammonia	8/31/11	GenOn - Tank Kiewit- Secondary containment	8/19/2012 Submittal 108 110					Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Jake Albers Dave Hammond
CONS	HAZ-5	Direct all vendors delivering aqueous ammonia to the site to use only tanker truck transport vehicles that meet or exceed the specifications of DOT Code MC-307.	Submit copies of notification letter to supply vendors indicating the transport vehicle specs to the CPM for review and approval.	At least 30 days prior to receipt of aqueous ammonia on site	10/1/12	GenOn	8/3/2012 Submittal 113					Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Tom Bertolini
CONS	HAZ-6	Direct all vendors delivering any hazardous material to the site to use only the route approved by the CPM. Obtain approval of the CPM if an alternate route is desired.	Submit copies of the required transportation route limitation direction to the CPM for review and approval.	At least 60 days prior to receipt of any hazardous material on site	9/1/13	GenOn	8/3/2012 Submittal 113					Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Tom Bertolini
CONS	HAZ-8a	Prepare a site-specific security plan for the commissioning and operational phases which addresses all the items in the Condition.	Notify the CPM that a site-specific operations site security plan is available for review and approval.	At least 30 days prior to receipt of hazardous materials on site	10/1/12	GenOn	8/23/2012 Submittal 121 9/17/12 Submittal 126		Letter only due to security needs and FOI requests.		8/22/12	August 22 2012 letter submitted and plan is on file				Kirk Emmons
CONS	MECH-1a	MAJOR PIPING & PLUMBING SYSTEMS: Submit for CBO design review and approval the proposed final design, specifications and calculations for each plant major piping and plumbing system listed in the CBO approved master drawing and master specification list.	Submit to the CBO for design review and approval the final plans, specs, and calcs for each major plant piping and plumbing system listed in Facility Design Table 2, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with LORS	At least 30 days prior to the start of any piping or plumbing construction	As required	KIEWIT					MCR	Approved in monthly installments included in Monthly reports under section 2.21				Jake Albers

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CONS	MECH-1b	Upon completion of construction of any such major piping or plumbing system, the project owner shall request the CBO's inspection approval of that construction.	Provide the required written documentation to the CPM.	Monthly	Include in MCR	KIEWIT					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Raja Ponniah
CONS	MECH-2a	PRESSURE VESSELS: Submit for CBO design review and approval the proposed final design, specifications and calculations for each plant pressure vessel listed in the CBO approved master drawing and master specification list.	Submit to the CBO for design review and approval the final plans, specs, and calcs, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with LORS	At least 30 days prior to start of onsite fabrication or installation of any pressure vessel	As required	KIEWIT					MCR	Approved in monthly installments included in Monthly reports under section 2.22			Cal-OSHA	Jake Albers
CONS	MECH-2b	Upon completion of construction of pressure vessels, the project owner shall request the CBO's inspection approval of that construction.	Provide the required written documentation to the CPM.	Monthly	Include in MCR	KIEWIT					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Raja Ponniah
CONS	MECH-3	HVAC SYSTEMS: Submit for CBO design review and approval the proposed final design, specifications and calculations for each HVAC system listed in the CBO approved master drawing and master specification list.	Submit the calcs, plans, and specs to the CBO, including a copy of the signed and stamped statement from the responsible mech eng certifying compliance with CBC and other applicable codes, with a copy of transmittal to CPM.	At least 30 days prior to start of construction of any HVAC or refrigeration system	As required	KIEWIT					MCR	Approved in monthly installments included in Monthly reports under section 2.22				Jake Albers
CONS	NOISE-2	Throughout the construction and operation of the project, document, investigate, evaluate, and attempt to resolve all project-related noise complaints. Noise Complaint Resolution process will be used.	File a Noise Complaint Resolution Form with the City and the CPM documenting resolution of the complaint.	Within 5 days of receiving a noise complaint	As required	K&G	2/4/2011 Submittal 034		Received noise complaint 1/31/2011. Submitted form to the CEC 2/4/2011							Raja Ponniah
CONS	PAL-5	Ensure that the PRS and PRM(s) monitor consistently with the PRMMP, all construction-related grading, excavation, trenching, and auguring in areas where potentially fossil-bearing materials have been identified.	Paleo monitors shall provide monthly summaries for inclusion in MCR.	Monthly	Include in MCR	PRS	8/9/12 Submittal 117		Letter Submitted 8/15/2012 requesting closure to monitoring due to age of fossils already recovered.		Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Dawn Owens
CONS	PAL-6	Through the designated PRS, ensure that all components of the PRMMP are adequately performed (see list of activities included in Condition).	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 completion and approval of the CPM-approved PRR required by PAL-07.	As required	As required	PRS						Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Stephen L. Erickson
CONS	PAL-7	Ensure preparation of a Paleontological Resources Report (PRR) by the designated PRS to be completed following completion of ground disturbing activities.	Submit the PRR under confidential cover to the CPM.	Within 90 days after completion of ground disturbing activities	3/28/12	PRS			Submittal # 174		9/4/2013					Stephen L. Erickson
CONS	Soil & Water-2c	Monitor and Maintain effective drainage, erosion and sediment control measures during construction	Provide Analysis of effectiveness of drainage, erosion and sediment control measures and the results of monitoring and maintain activities in MCR	Monthly	Include in MCR	KIEWIT					Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				Raja Ponniah
CONS	Soil & Water-3	If groundwater is encountered during construction or operation: comply with the requirements of the CVRWQCB Order NO. R5-2008-0081 for Waste Discharge Requirements for Dewatering and Other Low Threat Discharges to Surface Waters.	Submit a complete Notice of Intent (NOI) to obtain coverage under CVRWQCB Order No. R5-2008-0081. Submit copies to the CPM of all correspondence between the project owner and the CVRWQCB regarding Order No. R5-2008-0081 within 10 days of its receipt or submittal.	Prior to any groundwater discharge or dewatering activities	As required	KIEWIT	11/9/2011 Submittal 074 11/23/2011 Submittal 077 1/5/2012 Submittal 084 5/10/12 Submittal 101		Provided NOI from RWB 11/9/2011. Addnl 11/23/2011		11/9/11, 11/23/11, 5/10/12	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012			RWQCB	Raja Ponniah
CONS	Soil & Water-4	Comply with the requirements of the General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Industrial Activity (WQO 97-03-DWQ).	Develop and submit an Industrial SWPPP for the operation of the MLGS. Submit copies to the CPM of all correspondence between the project owner and the Central Valley Regional Water Quality Control Board regarding the industrial SWPPP within 10 days of its receipt or submittal.	Prior to commercial ops	12/23/11	GenOn	4/25/2013 Submittal 181								RWQCB	Diane Griffin Raja Ponniah
CONS	Soil & Water-5a	Provide 2 copies of the executed Waste Water Discharge Agreement with DDSD for the long term discharge of all wastewater streams for the MLGS to DDSD wastewater treatment facilities. Shall specify Peak discharge rate of 118 gpm. Do not connect to City of Antioch's wastewater pipeline along Wilbur Ave w/o the final agreement in place and submitted to CPM	Submit 2 copies of the of the executed agreement for the discharge of wastewater from the MLGS	No later than 60 days prior to connection the DDSD wastewater pipeline	9/1/11	GenOn	3/12/2012 Submittal 094 3/20/2013 Submittal 154		Approved by CEC per email response		3/12/2012	Submitted 2 copies of signed Permit on 3/20/2013	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012			Dawn Owens
CONS	Soil & Water-5b	Install and Maintain metering devices as part of the water supply and distribution system to monitor and record in gallons per the volume of ground water and potable water supplied to the MLGS.	Submit Evidence to the CPM that metering devices have been installed and are operational on groundwater wells, potable water and recycled water (if applicable) pipelines serving the project.	At least 60 days prior to use of any water source for operation	9/30/11	KIEWIT	9/21/12 Submittal 130					Submittal evidentiary only no approval required				Raja Ponniah

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CONS	Soil & Water-5c	Provide evidence to the CPM that the City has agreed to supply emergency backup water to the project in sufficient quantities to meet the projects needs at a flow rate comparable with the flow rate provide by one on site well.	Submit to the CPM evidence that city water meters are installed and are operational. And proof that the City can deliver alternative water the site in the event of an emergency interruption at a flow rate of 420gpm	No later than 30 days prior to installing a connection to the City of Antioch potable water main	9/1/11	GenOn	9/29/2011 Submittal 067 Additional submittal 10/11/2011 Submittal 069		Provided copies of correspondence regarding supply of city water.			Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Dawn Owens
CONS	Soil & Water-5d	If Primary Alternative water source is approved by CPM to be City of Antioch Fresh Water Supply. (1) Pay fee equal to no more than \$1,000/ AF of City of Antioch Water consumed annually. (2) A payment of \$15,000 shall be made to the city to offset water used during construction.	Provide evidence that brackish groundwater is environmentally undesirable or economical unsound. Provide proof that the initial water conservation fee of \$15,000 was paid to the city of Antioch.	Prior to site operations	4/1/13	GenOn	9/29/2011 Submittal 067		Provided evidence of \$15,000 payment to the city.	9/18/2012	Sent by Email to CEC PM C Stora 9/18	9/19/12 Email confirmation to Dawn				Dawn Owens
CONS	STRUC-1a	Prior to the start of any increment of construction, submit to the CBO for design review and approval the proposed lateral force procedures for project structures and equipment identified in the CBO-approved master drawing and master specification list. Must include items within this condition	Construction of any structure or component shall not begin until the CBO has approved the lateral force procedures to be employed in designing that structure or component. Submit to the CBO the final design plans, specs and calcs with a copy of the transmittal letter to the CPM.	At least 60 days prior to start of any structure or component listed in Facility Design Table 2 of GEN-2	As required	KIEWIT						Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Reid Strain
CONS	STRUC-1b	Submit to the CPM 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.	Submit required info to the CPM.	Monthly	Include in MCR	KIEWIT				Monthly 10th Business day of each month		Currently No noted issues with any Monthly report				Reid Strain
CONS	STRUC-2	Submit to the CBO the required number of sets of the documents related to work that has undergone CBO design review and approval related to concrete cylinder strength test reports and pour sign-off sheets, bolt torque and field weld inspection reports, and other reports covering structural activities requiring special inspections in accordance with CBC.	If discrepancies are found, within 5 days the Project Owner shall prepare and submit an NCR to the CBO with a copy of the transmittal letter to the CPM. Within 5 days of resolution, the Project Owner shall submit a copy of the correction action to the CBO and CPM. The CBO's approval or disapproval shall be submitted to the CPM within 15 delays.	As required	As required	KIEWIT						Verified by CBO approvals and documented in Monthly reports section 2.26				Dennis Chambers
CONS	STRUC-3	Submit to the CBO design changes to the final plans required by the CBC, including the revised drawings, specifications, calculations, and a complete description of, and supporting rationale for, the proposed changes, and shall give to the CBO prior notice of the intended filing.	Notify the CBO of the intended filing of design changes, and notify the CPM in the MCR of the CBO's approval of the revised plans.	Monthly	Include in MCR	KIEWIT			No impending changes	Monthly 10th Business day of each month		Currently No noted issues with any Monthly report				Sarah Copeland
CONS	STRUC-4	Tanks and vessels containing quantities of toxic or hazardous materials exceeding amounts specified in the 2007 CBC shall, at a minimum, be designed to comply with the requirements of that chapter.	Submit to the CBO for design review and approval the final plans, specs, and calcs, including a copy of the signed and stamped statement from the responsible engineer certifying compliance with LORS	At least 30 days prior to the start of installation of the tanks or vessels	As required	GenOn - Ammonia Tank KIEWIT - All Other						Verified by CBO approvals and documented in section 2.28				Jake Albers Dave Hammond
CONS	TLN-1	Construct the proposed transmission line according to the requirements of California Public Utility Commission's GO-95, GO-52, GO-131-D, Title 8, and Group 2, High Voltage Electrical Safety Orders, Sections 2700 through 2974 of the California Code of Regulations, and Pacific Gas and Electric's EMF-reduction guidelines.	Submit to the CPM a letter signed by a CA registered EE affirming that the line will be constructed according to the requirements set forth in the Condition.	At least 30 days prior to starting construction of proposed new lines	4/1/12	KIEWIT	4/13/12 Submittal 097			4/13/2012		Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Luke Goss
CONS	TLN-2	Every reasonable effort will be made to identify and correct, on a case-specific basis, any complaints of interference with radio or TV signals from operation of the proposed line and associated switchyard.	Submit to the CPM a letter signed by a CA registered EE affirming the project owners intention to comply with this requirement.	At least 30 days before starting operation of either line option	8/22/12	KIEWIT	8/21/2012 Submittal 120			8/21/2012		Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Luke Goss
CONS	TLN-3	Use a qualified individual to measure the strengths of the electric and magnetic fields from the line at the points of maximum intensity along the proposed route. The measurements shall be made before and after energization according to ANSI/IEEE standard procedures. These measurements shall be completed not later than six months after the start of operations.	File copies of the pre-and post-energization measurements with the CPM.	Within 60 days after completion of measurements	11/12/12	KIEWIT	7/12/13 CEC Submittal 169									Doug King
CONS	TLN-4	Ensure that the rights-of-way of the proposed transmission line are kept free of combustible material, as required under the provisions of Section 4292 of the Public Resources Code and Section 1250 of Title 14 of the California Code of Regulations.	Transmit to the CPM a letter affirming the intention to comply with this condition.	At least 30 days before the start of operations	8/24/2012 Submittal	GenOn	8/22/2012 Submittal 122			8/22/2012		Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Randy Dixon
CONS	TLN-5	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.	At least 30 days before lines are energized	8/22/12	KIEWIT	8/20/2012 Submittal 119			8/21/2012		Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012				Luke Goss

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CONS	TRANS-2b	Restore any area of Wilbur Ave that were damaged during construction to their original condition.	Provide photo/ videotape documentation to the CCOCPW and the City of Antioch Engineering Department and the CPM that any damaged areas have been restored.	Within 90 days following the completion of construction	3/28/12	KIEWIT	3/15/2013 Submittal 176								Contra Costa County Public Works Department and City of Antioch Engineering Department	Raja Ponniah	
CONS	TSE-1	Provide the CPM and CBO with a schedule of transmission facility design submittals, a master drawing list, a master specifications list, and a major equipment and structure list as indicated in the condition.	Provide info to CBO and CPM.	At least 60 days prior to start of transmission line construction.	3/2/12	KIEWIT	10/21/2011 Submittal 082					Submittal requirement only no approvals requested; updates for schedule are provided in Monthly reports					Luke Goss
CONS	TSE-3	If any discrepancy in design and/or construction is discovered in any engineering work that has undergone CBO design review and approval, the project owner shall document the discrepancy and recommend corrective action. The discrepancy documentation shall become a controlled document and shall be submitted to the CBO for review and approval and refer to this condition of certification.	Submit a copy of the CBO's approval or disapproval of any corrective action taken to resolve a discrepancy to the CPM.	Within 15 days of receipt	As required	KIEWIT	3/2/12 Submittal 093				3/2/2012	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012					Luke Goss
CONS	TSE-4	For the power plant switchyard, outlet line and termination, construction shall not begin until plans for that increment of construction have been approved by the CBO. These plans, together with design changes and design change notices, shall remain on the site for one year after completion of construction.	Submit to the CBO for review and approval the final design plans, specifications and calculations	Before the start of each increment of construction	As required	K&G	9/20/12 Submittal 127			9/20/2012	9/20/2002	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012					Luke Goss
CONS	TSE-5a	Design, construct, and operate the proposed transmission facilities in conformance with all applicable LORS, and the requirements listed in the condition.	Submit to the CBO: a) Design drawings, specifications, and calculations conforming with CPUC General Order 95 or National Electric Safety Code (NESC), Title 8 of the California Code and Regulations (Title 8), Articles 35, 36 and 37 of the High Voltage Electric Safety Orders, CA ISO standards, National Electric Code (NEC) and related industry standards, for the poles/towers, foundations, anchor bolts, conductors, grounding systems, and major switchyard equipment;	Prior to start of construction of the transmission facilities	5/1/12	KIEWIT	3/12/12				3/12/2012	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012					Luke Goss
CONS	TSE-5b	Provide electrical one-line diagrams signed and sealed by the registered professional electrical engineer in charge, a route map, and an engineering description of the equipment and configurations covered by requirements TSE-5 a) through j).	b) For each element of the transmission facilities identified above, the submittal package to the CBO shall contain the design criteria, a discussion of the calculation method(s), a sample calculation based on "worst case conditions" and a statement signed and sealed by the registered engineer in responsible charge, or other acceptable alternative verification, that the transmission element(s) will conform with CPUC General Order 95 or National Electric Safety Code (NESC), Title 8 of the California Code and Regulations (Title 8), Articles 35, 36 and 37 of the High Voltage Electric Safety Orders, California ISO standards, National Electric Code (NEC), and related industry standards;	Prior to start of construction of the transmission facilities	5/1/12	KIEWIT	9/20/12 Submittal 128			3/12/2012	3/12/2012	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012					Luke Goss
CONS	TSE-5c	Provide the final Detailed Facility Study (DFS) including a description of facility upgrades, operational mitigation measures, and/or special protection system sequencing and timing if applicable.	c) Electrical one-line diagrams signed and sealed by the registered professional electrical engineer in charge, a route map, and an engineering description of the equipment and configurations covered by requirements TSE-5 a) through f);	Prior to start of construction of the transmission facilities	5/1/12	KIEWIT	3/12/12				3/12/2012	Verified By email from(CEC) C Stora on 9/4/12					Luke Goss
CONS	TSE-5d	Provide the executed project owner and California ISO facility interconnection agreement.	d) The Special Protection System (SPS) sequencing and timing if applicable shall be provided concurrently to the CPM.	Prior to start of construction of the transmission facilities	5/1/12	GenOn	10/1/13		See email from CEC C Stora								Ashis Sengupta
CONS	TSE-5e	Provide evidence showing coordination with the affected agencies and utilities including but not limited to Western Area Power Administration and Lodi Electric Utility.	e) A letter stating that the mitigation measures or projects selected by the transmission owners for each reliability criteria violation, for which the project is responsible, are acceptable.	Prior to start of construction of the transmission facilities	5/1/12	GenOn	10/1/13		See email from CEC C Stora								Ashis Sengupta
CONS	TSE-5f	Inform the CPM and CBO of any impending changes which may not conform to the requirements of TSE-05 and request approval to implement such changes.	f) The final Phase II Interconnection Study, including a description of facility upgrades, operational mitigation measures, and/or special protection system sequencing and timing if applicable, and.	Prior to start of construction of the transmission facilities	5/1/12	GenOn	3/2/12			3/2/2012	3/2/2012	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012					Chuck Hicklin
CONS	TSE-5g	Provide a copy of the executed LGIA signed by the California ISO and the Project Owner.	g) A copy of the executed LGIA signed by the California ISO and the project owner. Prior to the start of construction of or modification of transmission facilities, the project owner shall inform the CBO and the CPM of any anticipated changes to the design that are different from the design previously submitted and approved and shall submit a detailed description of the proposed change and complete engineering, environmental, and economic rationale for the change to the CPM and CBO for review and approval.	Prior to start of construction of the transmission facilities	5/1/12	GenOn	3/2/12			3/2/2012	3/2/2012	Verified as accepted per Email notice from CEC MS. C Stora on 9/4/2012					Chuck Hicklin

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CONS	TSE-5h	Inform the CPM and CBO of any impending changes which may not conform to the requirements of TSE-05 and request approval to implement such changes.	Inform the CBO and CPM of any impending changes.	Prior to start to start of construction of the transmission facilities	As required	KIEWIT			No impending changes							Sarah Copeland
CONS	TSE-6	Provide notice to the Cal-ISO prior to synchronizing the facility with the California transmission system.	Provide notice to the Cal-ISO prior to synchronizing the facility with the California transmission system.	One week prior to initial synchronization w/ the grid	11/1/12	GenOn									Cal-ISO	Randy Willard
CONS	TSE-7	Inspect the transmission facilities during and after project construction, and for any subsequent CPM- and CBO-approved changes, to ensure conformance with CPLUC General Order 95 or National Electric Safety Code (NESC), Title 9 of the California Code and Regulations (Title 8), Articles 35, 36 and 37 of the High Voltage Electric Safety Orders, California ISO standards, National Electric Code (NEC) and related industry standards.	Transmit to the CPM and CBO: "As built" engineering description(s) and one-line drawings of the electrical portion of the facilities signed and sealed by the registered electrical engineer in charge; a statement verifying conformity with the standards set forth in Condition; "as built" engineering description of the mechanical, structural, and civil portion of the transmission facilities signed and sealed by the registered engineer in charge or an acceptable alternative verification; and a summary of inspections of the completed transmission facilities, and identification of any nonconforming work and corrective actions taken, signed and sealed by the registered engineer in charge.	Within 60 days after first synchronization to the grid	1/20/13	KIEWIT			Submitted to Steve Erickson January 2013							Luke Goss / Raja Ponniah (inspection summary only)
CONS	VIS-1a	Develop a treatment plan for the surfaces of all project structures and buildings visible to the public as specified in the condition.	Submit the proposed treatment plan to the CPM for review and approval and simultaneously to the CCC or responsible jurisdiction for review and comment. Any modifications must be sent to the CPM for approval	At least 90 days prior to specifying the colors and finishes of the first structures or building that are surface treated during manufacturing	12/1/10	K&M	5/19/2011 Submittal 049 6/6/2011 Submittal 050		Submitted plan per Condition on 5/19/2011 Submitted Hard Copies to Dawn Owens for submission to the City and County on 5/19/2011. Based on comments from the CEC resubmitted on 6/6/2011. Verbal approval received on Vis-1 approval around 6/15/2011.					Contra Costa County	Jake Albers	
CONS	VIS-1b	Treat the surfaces of all project structures and buildings visible to the public as specified in the condition.	Notify the CPM that the surface treatment of all listed structures and buildings has been completed and is ready for inspection and submit electronic color photographs taken from the same KOPs.	Prior to start of commercial operation	12/23/11	KIEWIT	Email from Christine Stora of the CEC dated 3/15/13 conditionally accepting the surface treatments.									Raja Ponniah
CONS	VIS-2a	Develop a landscaping plan which would Provide landscaping that reduces the visibility of the power plant structures and complies with local policies and ordinances	Submit landscaping plan to the CPM for review and approval and simultaneously to CCC for review and comment.	At least 90 days prior to installation	12/1/12	GenOn	2/25/13 Submittal 150								Contra Costa County	Stephen L. Erickson
CONS	VIS-2b	Provide landscaping that reduces the visibility of the power plant structures and complies with local policies and ordinances.	Simultaneously notify the CPM and CCC after the completion of the landscaping that the site is ready for inspection.	Within 7 days after completing landscaping	3/1/13	GenOn			3/12/2014; DJH contacting Zion to make repairs prior to scheduling an inspection.						Contra Costa County	Stephen L. Erickson
CONS	VIS-3a	Design and install all permanent exterior lighting such that (a) lamps and reflectors are not visible from beyond the project site, including any off-site security buffer areas; (b) lighting does not cause excessive reflected glare; (c) direct lighting does not illuminate the nighttime sky; (d) illumination of the project and its immediate vicinity is minimized; and (e) the plan complies with local policies and ordinances.	Contact the CPM to discuss the documentation required in the lighting mitigation plan. The project owner shall not order any exterior lighting until receiving CPM approval of the lighting mitigation plan.	At least 90 days prior to ordering any permanent exterior lighting	2/1/13	KIEWIT	3/26/2012 Submittal 096		The following participated on the call on 3/7/12: Scott Kennedy, Tharu Nadarajah, Greg Zullig, Kelly Zullig (all PKS), David Frandsen (GenOn), David Flores and Christine Stora (CEC) Drawing documentation to follow.	3/7/2012	3/7/2012 Verified in MCR No. 21					Tharu Nadarajah
CONS	VIS-3b	Prepare a lighting mitigation plan that includes the specific info set forth in the condition.	Submit to the CPM for review and approval and simultaneously to the Contra Costa County for review and comment a lighting mitigation plan.	At least 60 days prior to ordering any permanent exterior lighting	3/1/13	KIEWIT	3/26/2012 Submittal 096 4/16/12 Submittal 098			4/16/2012	5/3/2012 Verified in MCR No. 21				Contra Costa County	Tharu Nadarajah
CONS	VIS-3c	Notify the CPM that the permanent exterior lighting has been completed and is ready for inspection.	Set up an inspection appointment.	Prior to start of commercial operation	12/29/11	KIEWIT	David Flores of the CEC performed the inspection with Raja on 4/2/13									Raja Ponniah
CONS	VIS-3d	Notify the CPM of any complaints re: lighting.	Submit a complaint resolution form to the CPM record each lighting complaint and document resolution of that complaint.	Within 48 hours after receiving a complaint	As required	KIEWIT- During Construction GenOn -			No Complaints							Raja Ponniah Randy Dixon
CONS	WASTE-1b	Manage asbestos waste during demolition to comply with BAAQMD regulation 11, rule 2.	Provide summary report(s) to the CPM on asbestos waste management via MCR to include items specified w/in the condition	Monthly	Include in MCR	K&G				Monthly 10th Business day of each month	Currently No noted issues with any Monthly report				BAAQMD	Raja Ponniah
CONS	WASTE-4	If potentially contaminated soil is identified during site characterization, excavation, or grading at either the proposed site or linear facilities, as evidenced by discoloration, odor, detection by handheld instruments, or other signs, the Professional Engineer or Professional Geologist shall inspect the site, determine the need for sampling to confirm the nature and extent of contamination, and provide a written report to the project owner, representatives of DTSC, and the CPM stating the recommended course of action.	Submit any final reports filed by the Professional Engineer or Professional Geologist to the CPM. Project owner must notify the CPM within 24 hours of any orders issued to halt construction.	Within 5 days of their receipt	As required	KIEWIT	4/15/2011 Submittal 046 4/26/2011 10/14/2011 11/23/2011 Submittal 078 12/14/2011 Submittal 081 4/27/12 Submittal 100 5/18/2012 Submittal 104 5/23/12 Submittal 106 5/25/12 Submittal 107 6/06/2012		Oily dirt - East side Oily dirt- Middle of Power Block, 11/23/2011 addnl oil on East Side. Dec. 14 DTSC correspondence	4/15/11, 4/26/11, 10/14/11, 10/14/11, 11/23/11, 12/14/11, 5/1/12, 5/18/12, 6/5/2012	4/15/11, 4/26/11, 10/14/11, 10/14/11, 11/23/11, 12/14/11, 5/1/12, 5/18/12, 6/5/2012				Verified as accepted per Email notice from CEC MS. C Stora on 8/4/2012	Gene Amrhein

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CONS	WASTE-5b	Require all project contractors and subcontractors to adhere to the city's waste diversion requirements and provide to the project owner adequate documentation of the types and volumes of wastes generated, how the wastes were managed, and volumes of wastes diverted	Submit documentation to the city of Antioch, with copies to the CPM, demonstrating compliance with the diversion program requirements. The required documentation shall include a final completed Waste Management Plan (as set forth by the city ordinance) and all necessary receipts or records of measurement from entities receiving project wastes.	Not later than 30 days after completion of project construction	1/28/12	KIEWIT	Loaded recycle receipts to the City of Antioch FTP site on 6/26/2013, and set an email to Julie Haas-Waglowicz asking for confirmation.		Submittal # 171		8/21/2013				City of Antioch Engineering Department	Raja Ponniah
CONS	WASTE-5c	Comply with all applicable provisions of the city of Antioch's Construction and Demolition Debris Recycling Ordinance No. 1018- C-S	Provide documentation to the CPM that the project has satisfactorily complied with the city of Antioch Ordinance No. 1018-C-S	Prior to start of project Operation	12/23/11	KIEWIT	Submittal 166 sent to CEC on 6/26/2013		Submittal # 171		8/21/2013					Raja Ponniah
CONS	WASTE-6b	Obtain a hazardous waste generator identification number from the United States Environmental Protection Agency prior to generating any hazardous waste during operations.	Keep a copy of the identification number on file at the project site and provide the number to the CPM.	At least 30 days prior to commercial operation.	1/22/12	NRG	11/16/10		Approved 7/22/2011							Stephen L. Erickson Diane Griffin
CONS	WORKER SAFETY-3b	The CSS shall prepare and submit a monthly safety inspection that includes the info specified in the verification language of the condition.	Submit required info to the CPM.	Monthly	Include in MCR	KIEWIT			CEC approval per email from J Caswell on 11/16/10		Monthly 10th Business day of each month		Currently No noted issues with any Monthly report			Raja Ponniah
CONS	WORKER SAFETY-8	The project owner shall submit the fire protection drawings and specifications for the Battery Energy Storage System (BESS) to the Contra Costa County Fire Protection District for review and comment, and to the Delegate Chief Building Official (DCBO) for plan check and inspection, and to the CPM for review and approval.	Verification: At least sixty (60) days prior to the start of construction of the BESS project, the project owner shall provide the complete set of BESS fire protection drawings and specifications to the Contra Costa County Fire Protection District for review and comment, and to the DCBO for plan check, approval and construction inspection, and to the CPM for review and approval.	Prior to the start of construction		KIEWIT									Amended February 2019	
OPS	AQ-8	Total mass emissions of nitrogen oxides, carbon monoxide, precursor organic compounds, PM10, and sulfur dioxide that are emitted by the Gas Turbines (S-1, S-2, S-3, and S-4) during the commissioning period shall accrue towards the consecutive twelve-month emission limitations specified in AQ-22.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						AQMD	Scott Seipel
OPS	AQ-9	Shall not operate the Gas Turbines (S-1, S-2, S-3, and S-4) in a manner such that the pollutant emissions from each gas turbine will exceed the following limits during the commissioning period. These emission limits shall include emissions resulting from the start-up and shutdown of the Gas Turbines (S-1, S-2, S-3, S-4). NOx (as NO2) 3,063 pounds per calendar day 188 pounds per hour. CO 33,922 pounds per calendar day 2,405 pounds per hour. POC (as CH4) 2,008 pounds per calendar day. PM10 235 pounds per calendar day. SO2 149 pounds per calendar day.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						AQMD	Scott Seipel
OPS	AQ-11	Fire the Gas Turbines (S-1, S-2, S-3, and S-4) exclusively on PUC-regulated natural gas with a maximum sulfur content of 1 grain per 100 standard cubic feet. To demonstrate compliance with this limit, the operator of S-1, S-2, S-3 and S-4 shall sample and analyze the gas from each supply source at least monthly to determine the sulfur content of the gas. PQSE monthly sulfur data may be used provided that such data can be demonstrated to be representative of the gas delivered to the MLGS.	The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the quarterly operation report (AQ-SC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.							Scott Seipel
OPS	AQ-12	Do not operate the units such that the heat input rate to each Gas Turbine (S-1, S-2, S-3, and S-4) exceeds 2,202 MMBtu (HHV) per hour.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report.	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.							Scott Seipel
OPS	AQ-13	Do not operate the units such that the heat input rate to each Gas Turbine (S-1, S-2, S-3, and S-4) exceeds 52,848 MMBtu (HHV) per day.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report.	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.							Scott Seipel
OPS	AQ-14	The owner/operator shall not operate the units such that the combined cumulative heat input rate for the Gas Turbines (S-1, S-2, S-3, and S-4) exceeds 13,994,976 MMBtu (HHV) per year but excluding heat input rate during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report.	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						Amended February 2019	Scott Seipel
OPS	AQ-15	The owner operator shall not operate S-1, S-2, S-3, and S-4 such that the combined hours for all four units exceeds 7,008 hours per year (excluding operations necessary for maintenance, tuning, testing, readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations).	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						Amended February 2019	Scott Seipel
OPS	AQ-16	Ensure that the each Gas Turbine (S-1, S-2, S-3, S-4) is abated by the properly operated and properly maintained Selective Catalytic Reduction (SCR) System A-2, A-4, A-5 or A-8 and Oxidation Catalyst System A-1, A-3, A-5, or A-7 whenever fuel is combusted at those sources and the corresponding SCR catalyst bed (A-2, A-4, A-5 or A-8) has reached minimum operating temperature.	Make the site available for inspection by representatives of the District, ARB, and the Commission upon request. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	As Required	As required	NRG			Reports submitted quarterly.							Scott Seipel
OPS	AQ-17	Normal Operations Emissions Limits "The owner/operator shall ensure that the Gas Turbines (S-1, S-2, S-3, S-4) comply with requirements (a) through (f). Requirements (a) through (f) do not apply during gas turbine start-ups, combustor tuning operations, shutdowns, readiness testing for black start capability, commissioning activities for black start capability, or black start emergency operations."	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report.	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						Amended February 2019	Scott Seipel
OPS	AQ-18	Summary, Startup/Shutdown Limits: "The owner/operator shall ensure that the regulated air pollutant mass emission rates from each of the Gas Turbines (S-1, S-2, S-3, and S-4) during a start-up or shutdown does not exceed the limits established below. Startups shall not exceed 30 minutes. Shutdowns shall not exceed 15 minutes. These requirements do not apply during readiness testing for black start capability, commissioning activities for black start capability, or black start emergency operations."	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						Amended May 21, 2021	Scott Seipel



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OPS	AQ-19	Do not perform combustor tuning on each Gas Turbine (S-1, S-2, S-3, or S-4) more than twice every consecutive 12 month period. Combustor tuning shall only be performed on one gas turbine per day. The owner/operator shall notify the District no later than seven days prior to combustor tuning activity. The emissions during combustor tuning from each gas turbine shall not exceed the limits established below. NOx (as NO2):80, CO:450, POC (as CH4):30	notify both the District and CPM at least 7 days prior to the combustor tuning. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8) This does not include Initial Construction Tunings	7 days prior to combustor tuning	11/1/12	NRG			Reporting on as needed basis.						AQMD	Scott Seipel
OPS	AQ-20	Do not allow total combined emissions from the Gas Turbines (S-1, S-2, S-3, and S-4), including emissions generated during gas turbine start-ups, and shutdowns, but excluding emissions generated during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations, to exceed the following limits during any calendar day (except for days during which combustor tuning events occur: (a) 2,468 pounds of NOx (as NO2) per day (Basis: Cumulative Increase) (b) 4,850 pounds of CO per day (Basis: Cumulative Increase) (c) 476 pounds of POC (as CH4) per day (Basis: Cumulative Increase) (d) 864 pounds of PM10 per day (Basis: Cumulative Increase) (e) 596 pounds of SO2 per day (Basis: Cumulative Increase)	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						Amended February 2019	Scott Seipel
OPS	AQ-21	Do not allow cumulative combined emissions from the Gas Turbines (S-1, S-2, S-3, and S-4), including emissions generated during gas turbine start-ups, combustor tuning, shutdowns, and malfunctions, but excluding emissions generated during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations, to exceed the following limits during any consecutive twelve-month period: (a) 2,941 pounds of NOx (as NO2) per day (Basis: Cumulative Increase) (b) 8,378 pounds of CO per day (Basis: Cumulative Increase) (c) 693 pounds of POC (as CH4) per day (Basis: Cumulative Increase) (d) 864 pounds of PM10 per day (Basis: Cumulative Increase) (e) 596 pounds of SO2 per day (Basis: Cumulative Increase)	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						Amended February 2019	Scott Seipel
OPS	AQ-22	not allow cumulative combined emissions from the Gas Turbines (S-1, S-2, S-3, and S-4), including emissions generated during gas turbine start-ups, combustor tuning, shutdowns, and malfunctions, but excluding emissions generated during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations, to exceed the following limits during any consecutive twelve-month period: (a) 78.57 tons of NOx (as NO2) per year (Basis: Offsets)(b) 138.57 tons of CO per year (Basis: Cumulative Increase)(c) 14.21 tons of POC (as CH4) per year (Basis: Offsets)(d) 31.54 tons of PM10 per year (Basis: Cumulative Increase)(e) 4.94 tons of SO2 per year (Basis: Cumulative Increase)	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						Amended February 2019	Scott Seipel
OPS	AQ-23a	Do not allow the maximum projected annual toxic air contaminant emissions (per AQ-26) from the Gas Turbines combined to exceed the following limits: formaldehyde 8,458 7796 pounds per year, benzene 205 166 pounds per year, Specified polycyclic aromatic hydrocarbons (PAHs) 2.59 1.68 pounds per year unless the following requirement is satisfied: (1)Perform a health risk assessment to determine the total facility risk using the emission rates determined by source testing and the most current Bay Area Air Quality Management District approved procedures and unit risk factors in effect at the time of the analysis. Submit the risk analysis to the District and the CEC CPM. May request that the District and the CEC CPM revise the carcinogenic compound emission limits specified above. Demonstrates to the satisfaction of the APCO that these revised emission limits will not result in a significant cancer risk, the District and the CEC CPM may, at their discretion, adjust the carcinogenic compound emission limits listed above.	Source test results obtained through compliance with AQ-26 and AQ- 30 shall confirm the toxic air contaminant emission rates or submit an updated health risk assessment.	Within 60 days of initial source testing. (See condition AQ-30b)	4/1/11	NRG			Initial Source Test submitted 6/18/13. Annual testing required.						Amended February 2019	Scott Seipel
OPS	AQ-23b	Perform a health risk assessment to determine the total facility risk using the emission rates determined by source testing and the most current Bay Area Air Quality Management District approved procedures and unit risk factors in effect at the time of the analysis.	Submit the risk analysis to the District and the CEC CPM. May request that the District and the CEC CPM revise the carcinogenic compound emission limits specified above. Demonstrates to the satisfaction of the APCO that these revised emission limits will not result in a significant cancer risk, the District and the CEC CPM may, at their discretion, adjust the carcinogenic compound emission limits listed above.	Every 24 months submit within 60days of test	As required	NRG										Scott Seipel
OPS	AQ-24	Demonstrate compliance with AQ-12 through AQ-15, AQ-17(a) through AQ-17(e), AQ-18 (NOx and CO limits), AQ-19 (NOx and CO limits), AQ-20(a), AQ-20(b), AQ-21(a), AQ-21(b), AQ-22(a) and AQ- 22(b), AQ-41, AQ-42, AQ-43, AQ-44(a), AQ-44(b), AQ-45(a), and AQ-45(b), by using properly operated and maintained continuous monitors (during all hours of operation including gas turbine start-up, combustor tuning, and shut down periods, readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations). The owner/operator shall monitor for all of the following a. through m. Black Start Specific: (i) For each calendar day, the average hourly Heat Input Rates, corrected NOx emission concentration, NOx mass emission rate (as NO2), corrected CO emission concentration, and CO mass emission rate during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations for S-3 and S-4. (m) On a monthly basis, the cumulative total NOx mass emissions (as NO2) and cumulative total CO mass emissions during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations, for the previous consecutive twelve-month period for sources S-3 and S-4 combined. Note: The required data in (i) thru (k) shall exclude any data during readiness testing for black start capability, commissioning activities for black start capability, and black start emergency operations.	Make the site available for inspection by representatives of the District, ARB and the Commission to verify the continuous monitoring and recordkeeping system is properly installed and operational.	As Required	As required	NRG										Scott Seipel

Color Code Key:

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Sort Code	Cond. #	Description of Project Owner's Responsibilities	Verification/Action/Submital Required by Project Owner	Timeframe	Date Due to CEC CPM	Lead Party	Date sent to CEC, CBO or agency	CEC Log # and Status	Comments	Date Submitted to GenOn	Date sent to CEC, CBO or agency2	Approved	CPM	CBO	Other	Responsible Party
OPS	AQ-25	Demonstrate compliance with AQ-17(f), AQ-17(g), AQ-17(h), AQ-17(i), AQ-20(c), AQ-20(d), AQ-20(e), AQ-21(c), AQ-21(d), AQ-21(e), AQ-22(c), AQ-22(d), AQ-22(e), AQ-22(f), AQ-22(g), AQ-22(h), AQ-22(i), AQ-22(j), AQ-22(k), AQ-22(l), AQ-22(m), AQ-22(n), AQ-22(o), AQ-22(p), AQ-22(q), AQ-22(r), AQ-22(s), AQ-22(t), AQ-22(u), AQ-22(v), AQ-22(w), AQ-22(x), AQ-22(y), AQ-22(z), AQ-23(a), AQ-23(b), AQ-23(c), AQ-23(d), AQ-23(e), AQ-23(f), AQ-23(g), AQ-23(h), AQ-23(i), AQ-23(j), AQ-23(k), AQ-23(l), AQ-23(m), AQ-23(n), AQ-23(o), AQ-23(p), AQ-23(q), AQ-23(r), AQ-23(s), AQ-23(t), AQ-23(u), AQ-23(v), AQ-23(w), AQ-23(x), AQ-23(y), AQ-23(z), AQ-24(a), AQ-24(b), AQ-24(c), AQ-24(d), AQ-24(e), AQ-24(f), AQ-24(g), AQ-24(h), AQ-24(i), AQ-24(j), AQ-24(k), AQ-24(l), AQ-24(m), AQ-24(n), AQ-24(o), AQ-24(p), AQ-24(q), AQ-24(r), AQ-24(s), AQ-24(t), AQ-24(u), AQ-24(v), AQ-24(w), AQ-24(x), AQ-24(y), AQ-24(z), AQ-25(a), AQ-25(b), AQ-25(c), AQ-25(d), AQ-25(e), AQ-25(f), AQ-25(g), AQ-25(h), AQ-25(i), AQ-25(j), AQ-25(k), AQ-25(l), AQ-25(m), AQ-25(n), AQ-25(o), AQ-25(p), AQ-25(q), AQ-25(r), AQ-25(s), AQ-25(t), AQ-25(u), AQ-25(v), AQ-25(w), AQ-25(x), AQ-25(y), AQ-25(z), AQ-26(a), AQ-26(b), AQ-26(c), AQ-26(d), AQ-26(e), AQ-26(f), AQ-26(g), AQ-26(h), AQ-26(i), AQ-26(j), AQ-26(k), AQ-26(l), AQ-26(m), AQ-26(n), AQ-26(o), AQ-26(p), AQ-26(q), AQ-26(r), AQ-26(s), AQ-26(t), AQ-26(u), AQ-26(v), AQ-26(w), AQ-26(x), AQ-26(y), AQ-26(z), AQ-27(a), AQ-27(b), AQ-27(c), AQ-27(d), AQ-27(e), AQ-27(f), AQ-27(g), AQ-27(h), AQ-27(i), AQ-27(j), AQ-27(k), AQ-27(l), AQ-27(m), AQ-27(n), AQ-27(o), AQ-27(p), AQ-27(q), AQ-27(r), AQ-27(s), AQ-27(t), AQ-27(u), AQ-27(v), AQ-27(w), AQ-27(x), AQ-27(y), AQ-27(z), AQ-28(a), AQ-28(b), AQ-28(c), AQ-28(d), AQ-28(e), AQ-28(f), AQ-28(g), AQ-28(h), AQ-28(i), AQ-28(j), AQ-28(k), AQ-28(l), AQ-28(m), AQ-28(n), AQ-28(o), AQ-28(p), AQ-28(q), AQ-28(r), AQ-28(s), AQ-28(t), AQ-28(u), AQ-28(v), AQ-28(w), AQ-28(x), AQ-28(y), AQ-28(z), AQ-29(a), AQ-29(b), AQ-29(c), AQ-29(d), AQ-29(e), AQ-29(f), AQ-29(g), AQ-29(h), AQ-29(i), AQ-29(j), AQ-29(k), AQ-29(l), AQ-29(m), AQ-29(n), AQ-29(o), AQ-29(p), AQ-29(q), AQ-29(r), AQ-29(s), AQ-29(t), AQ-29(u), AQ-29(v), AQ-29(w), AQ-29(x), AQ-29(y), AQ-29(z), AQ-30(a), AQ-30(b), AQ-30(c), AQ-30(d), AQ-30(e), AQ-30(f), AQ-30(g), AQ-30(h), AQ-30(i), AQ-30(j), AQ-30(k), AQ-30(l), AQ-30(m), AQ-30(n), AQ-30(o), AQ-30(p), AQ-30(q), AQ-30(r), AQ-30(s), AQ-30(t), AQ-30(u), AQ-30(v), AQ-30(w), AQ-30(x), AQ-30(y), AQ-30(z), AQ-31(a), AQ-31(b), AQ-31(c), AQ-31(d), AQ-31(e), AQ-31(f), AQ-31(g), AQ-31(h), AQ-31(i), AQ-31(j), AQ-31(k), AQ-31(l), AQ-31(m), AQ-31(n), AQ-31(o), AQ-31(p), AQ-31(q), AQ-31(r), AQ-31(s), AQ-31(t), AQ-31(u), AQ-31(v), AQ-31(w), AQ-31(x), AQ-31(y), AQ-31(z), AQ-32(a), AQ-32(b), AQ-32(c), AQ-32(d), AQ-32(e), AQ-32(f), AQ-32(g), AQ-32(h), AQ-32(i), AQ-32(j), AQ-32(k), AQ-32(l), AQ-32(m), AQ-32(n), AQ-32(o), AQ-32(p), AQ-32(q), AQ-32(r), AQ-32(s), AQ-32(t), AQ-32(u), AQ-32(v), AQ-32(w), AQ-32(x), AQ-32(y), AQ-32(z), AQ-33(a), AQ-33(b), AQ-33(c), AQ-33(d), AQ-33(e), AQ-33(f), AQ-33(g), AQ-33(h), AQ-33(i), AQ-33(j), AQ-33(k), AQ-33(l), AQ-33(m), AQ-33(n), AQ-33(o), AQ-33(p), AQ-33(q), AQ-33(r), AQ-33(s), AQ-33(t), AQ-33(u), AQ-33(v), AQ-33(w), AQ-33(x), AQ-33(y), AQ-33(z), AQ-34(a), AQ-34(b), AQ-34(c), AQ-34(d), AQ-34(e), AQ-34(f), AQ-34(g), AQ-34(h), AQ-34(i), AQ-34(j), AQ-34(k), AQ-34(l), AQ-34(m), AQ-34(n), AQ-34(o), AQ-34(p), AQ-34(q), AQ-34(r), AQ-34(s), AQ-34(t), AQ-34(u), AQ-34(v), AQ-34(w), AQ-34(x), AQ-34(y), AQ-34(z), AQ-35(a), AQ-35(b), AQ-35(c), AQ-35(d), AQ-35(e), AQ-35(f), AQ-35(g), AQ-35(h), AQ-35(i), AQ-35(j), AQ-35(k), AQ-35(l), AQ-35(m), AQ-35(n), AQ-35(o), AQ-35(p), AQ-35(q), AQ-35(r), AQ-35(s), AQ-35(t), AQ-35(u), AQ-35(v), AQ-35(w), AQ-35(x), AQ-35(y), AQ-35(z), AQ-36(a), AQ-36(b), AQ-36(c), AQ-36(d), AQ-36(e), AQ-36(f), AQ-36(g), AQ-36(h), AQ-36(i), AQ-36(j), AQ-36(k), AQ-36(l), AQ-36(m), AQ-36(n), AQ-36(o), AQ-36(p), AQ-36(q), AQ-36(r), AQ-36(s), AQ-36(t), AQ-36(u), AQ-36(v), AQ-36(w), AQ-36(x), AQ-36(y), AQ-36(z)	Make the site available for inspection by representatives of the District, ARB and the Commission to verify the calculation and record keeping system is properly installed and operational.	As Required	As required	NRG									<b>Amended February 2019</b>	Scott Seipel
OPS	AQ-26	Demonstrate compliance with AQ-23, the owner/operator shall calculate and record on an annual basis the maximum projected annual emissions of Formaldehyde, Benzene, and Specified PAHs. The owner/operator shall calculate the maximum projected annual emissions using the maximum annual heat input rate of 13,894,976 MMBtu/year for S-1, S-2, S-3, and S-4 combined and the highest emission factor (pounds of pollutant per MMBtu of heat input) determined by the most recent of any source test of the S-1, S-2, S-3, or S-4 Gas Turbines. If the highest emission factor for a given pollutant occurs during minimum-load turbine operation, a reduced annual heat input rate may be utilized to calculate the maximum projected annual emissions to reflect the reduced heat input rates during gas turbine start-up and minimum load operation. The reduced annual heat input rate shall be subject to District review and approval.	Make the site available for inspection by representatives of the District, ARB and the Commission to verify the calculation and recordkeeping system is properly installed and operational.	As Required	As required	NRG										Scott Seipel
OPS	AQ-27b	<b>A source test shall be conducted at least once every 1,752 hours of turbine operation or once every 36 consecutive months, whichever comes first.</b> <b>Additional source testing may be required at the discretion of the District to address or ascertain compliance with the requirements of this permit.</b> Ongoing compliance with AQ-17(e) shall be demonstrated through calculations of corrected ammonia concentrations based upon the source test correlation and continuous records of ammonia injection rate.	<b>Testing for steady-state emissions shall be conducted upon initial operation and at least once every 12 months.</b>	within 60 days of test every 12 months	As required	NRG									<b>Amended May 21, 2021</b>	Scott Seipel
OPS	AQ-28a	<b>The owner/operator shall perform a relative accuracy test audit (RATA) on the CEMS, on at least an annual basis or as allowed by the regulations and approved by the District, in accordance with the applicable requirements of 40 Part 75 Appendix A and 40 CFR Part 60 Appendix B Performance Specifications.</b>	Submit the results and field data collected during source tests to the District and CPM within 60 days of testing	Annually	Include in ACR	NRG									<b>Updated February, 2019</b>	Scott Seipel
OPS	AQ-30b	Testing for toxic air contaminant emissions shall be conducted upon initial operation and at least once every 24 months.	The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing	within 60 days of test every 24 months thereafter	As required	NRG	6/25/13 Submittal 164 Source Test Report Submitted									Scott Seipel
OPS	AQ-31	Calculate the sulfuric acid mist (SAM) emission rate using the total heat input for the sources and the highest results of any source testing conducted pursuant to AQ-32. If this SAM mass emission limit of AQ-33 is exceeded, the owner/operator must utilize air dispersion modeling to determine the impact (in µg/m <sup>3</sup> ) of the sulfuric acid mist emissions pursuant to Regulation 2, Rule 2, Sections 305 and 306. (Basis: Regulation 2, Rule 2, Section-227)	Make the site available for inspection by representatives of the District, ARB and the Commission to verify the calculation and recordkeeping system is properly installed and operational. The quarterly operation report (AQ-SC8) shall include a determination of the impact if triggered by this condition.	As Required & Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.						<b>Amended May 21, 2021</b>	Scott Seipel
OPS	AQ-32b	<b>A source test shall be conducted at least once every 1,752 hours of turbine operation or once every 36 consecutive months, whichever comes first. Additional source testing may be required at the discretion of the District to address or ascertain compliance with the requirements of this permit.</b>	Submit the results and field data collected during source tests to the District and CPM within 60 days of testing and according to a preapproved protocol (AQ-29).	within 60 days of test	As required	NRG	6/25/13 Submittal 164 Source Test Report Submitted								<b>Amended May 21, 2021</b>	Scott Seipel
OPS	AQ-33	Do not allow sulfuric acid emissions (SAM) from stacks combined to exceed seven tons in any consecutive 12 month period. (Basis: Regulation 2, Rule 2, Section 227, and Regulation 2, Rule 2, Section 409)	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQSC8).	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.							Scott Seipel
OPS	AQ-35	Submit all reports (including, but not limited to monthly CEM reports, monitor breakdown reports, emission excess reports, equipment breakdown reports, etc.) as required by District Rules or Regulations and in accordance with all procedures and time limits specified in the Rule, Regulation, Manual of Procedures, or Enforcement Division Policies & Procedures Manual	Ensure that notifications and reports, including the quarterly operation report (AQ-SC8), are prepared and submitted in compliance with this condition	As Required	As required	NRG										Scott Seipel
OPS	AQ-36	Maintain all records and reports on site for a minimum of five years. These records shall include but are not limited to: continuous monitoring records (firing hours, fuel flows, emission rates, monitor excesses, breakdowns, etc.), source test and analytical records, natural gas sulfur content analysis results, emission calculation records, records of plant upsets and related incidents. The owner/operator shall make all records and reports available to District and the CEC CPM staff upon request.	Make the site available for inspection by representatives of the District, ARB and the Commission.	As Required	As required	NRG										Joe Moura

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OPS	AQ-37	notify the District and the CEC CPM of any violations of these permit conditions. Notification shall be submitted in a timely manner, in accordance with all applicable District Rules, Regulations, and the Manual of Procedures. Notwithstanding the notification and reporting requirements given in any District Rule, Regulation, or the Manual of Procedures, the owner/operator shall submit written notification (facsimile is acceptable) to the Enforcement Division within 96 hours of the violation of any permit condition.	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report.	Quarterly	30 days after end of quarter	NRG			Reports submitted quarterly.							Scott Seipel
OPS	AQ-40	Ensure that the MLGS complies with the continuous emission monitoring requirements of 40 CFR Part 75	Submit to the CPM and District the results of audits of the monitoring system demonstrating compliance with this condition as part of the quarterly operation report.	Quarterly	30 days after end of quarter	NRG			Kiewit to provide per email from Jason Lockwood 10.19.12							Scott Seipel
OPS	AQ-44	Daily Emission Limits for Black Start Operations: The owner/operator shall not allow total combined emissions from readiness testing for black start capability and black start emergency operations at Gas Turbines S-3 and S-4 to exceed the following limits during any consecutive 24-clock hour period: (a) NOx (as NO2) ..... 8,848 pounds per day; (b) CO ..... 100,673 pounds per day; (c) POC (as CH4) ..... 7,422 pounds per day; (d) PM10/PM2.5 ..... 255 pounds per day; (e) SO2 ..... 174 pounds per day.	For days when Black Start Operations or readiness testing occurs, a summary of operation events, operating data and associated monitoring records shall be included in the subsequent quarterly operation report (AQ-SC8).	Quarterly	30 days after end of quarter				Add with Black Start Amendment February 2019							Ameneded February 2019
OPS	AQ-45	Annual Emission Limits for Readiness Testing for Black Start Capability: The owner/operator shall not allow emissions from readiness testing for black start capability at Gas Turbines S-3 and S-4 to exceed the following limits during any consecutive twelve-month period: (a) NOx (as NO2) ..... 414 pounds per year; (b) CO ..... 32,936 pounds per year; (c) POC (as CH4) ..... 1,011 pounds per year; (d) PM10/PM2.5 ..... 15 pounds per year; (e) SO2 ..... 10 pounds per year.	For days when readiness testing occurs, a summary of operation events, operating data and associated monitoring records shall be included in the subsequent quarterly operation report (AQ-SC8).	Black Start Operation	30 days after end of quarter				Add with Black Start Amendment February 2019							Ameneded February 2019
OPS	AQ-46	AQ-46 Annual Emission Limits for Black Start Operations: The owner/operator shall not allow total combined emissions from readiness testing for black start capability and black start emergency operations at Gas Turbines S-3 and S-4 to exceed the following limits during any consecutive twelve-month period: (a) NOx (as NO2) ..... 16,293 pounds per year; (b) CO ..... 212,725 pounds per year; (c) POC (as CH4) ..... 15,750 pounds per year; (d) PM10/PM2.5 ..... 518 pound per year; (e) SO2 ..... 354 pounds per year.	For days when readiness testing occurs, a summary of operation events, operating data and associated monitoring records shall be included in the subsequent quarterly operation report (AQ-SC8).	Black Start Operation	As required	NRG			Add with Black Start Amendment February 2019							Scott Seipel
OPS	AQ-48	The project owner shall not exceed 50 hours per year per engine for reliability related testing on the diesel emergency generator and diesel fire pump engines. (Basis: Title 17, California Code of Regulations, Section 93115, ATCM for Stationary CI Engines)	The project owner shall verify compliance with this Condition of Certification in each quarterly report required by COC AQ-SC8.	Quarterly	30 days after end of quarter	NRG			AQ-41 added with petition to amend approved 11/17/2014. Revised to AQ-48 with February 2019 Black Start Amendment							Ameneded February 2019
OPS	AQ-49	The project owner shall operate each emergency standby engine only for the following purposes: to mitigate emergency conditions, for emission testing, or for reliability related testing on the diesel emergency generator and diesel fire pump engines. (Basis: Title 17, California Code of Regulations, Section 93115, ATCM for Stationary CI Engines)	The project owner shall verify compliance with this Condition of Certification in each quarterly report required by COC AQ-SC8.	Quarterly	30 days after end of quarter	NRG			AQ-42 added with petition to amend approved 11/17/2014. Revised to AQ-49 with February 2019 Black Start Amendment							Ameneded February 2019
OPS	AQ-50	The project owner shall operate each emergency standby engine only when a non-resettable totalizing meter (with a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained. (Basis: Title 17, California Code of Regulations, Section 93115, ATCM for Stationary CI Engines)	The project owner shall make the site available for inspection by representatives of the District, ARB and the Commission.	As Required	As Required	NRG			AQ-43 added with petition to amend approved 11/17/2014. Revised to AQ-50 with February 2019 Black Start Amendment							Ameneded February 2019
OPS	AQ-51	Records: The project owner shall maintain the following monthly record in a District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). Log entries shall be retained on-site, either at a central location or at the engine's location, and made immediately available to the District staff and CPM upon request. a) Hours of operation for reliability testing. b) Hours of operation for emission testing. c) Hours of operation for emergencies. d) For each emergency, the nature of the emergency condition. e) Fuel usage for each engine(s). (Basis: Title 17, California Code of Regulations, Section 93115, ATCM for Stationary CI Engines)	The project owner shall make the site and records available for inspection by representatives of the District, ARB and the Commission.	As Required	As Required	NRG			AQ-44 added with petition to amend approved 11/17/2014. Revised to AQ-51 with February 2019 Black Start Amendment							Ameneded February 2019

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OPS	AQ-52	If the emergency standby engine is located on school grounds or within 500 feet of any school ground, the following requirements shall apply. MLGS is NOT within 500 feet of any school grounds.	The project owner shall make the site and records available for inspection by representatives of the District, ARB and the Commission.	As Required	As Required	NRG			AQ-45 added with petition to amend approved 11/27/2014. Revised to AQ-52 with February 2019 Black Start Amendment							Amended February 2019	Scott Seigel
OPS	BIO-4d	Keep signed WEAP statements in project files.	During project operation, signed statements for active project operational personnel shall be kept on file for six months following the termination of an individual's employment.	As required	As required	NRG						Verified Monthly in MCR's in sections 2.05					Dan Leach
OPS	BIO-8	Provide an annual Payment to Friends of San Pablo Bay. The First Annual Payment shall be at least equal to \$2,693.00 + \$20,000 payment of good faith	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the start of project operation	1/22/12	NRG	9/10/12 Submittal 124	Submittal 138		9/10/2012		Proof of payment submitted 9/10/2012 - No acceptance is required Email verification to C stora on 9/18/12					Dan Leach
OPS	BIO-8 2013	Provide an annual Payment to Friends of San Pablo Bay. The First Annual Payment shall be at least equal to \$2,693.00 + \$20,000 payment of good faith	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	1/22/12	NRG						Proof of payment submitted 5/29/2014 - via Email to C stora on 7/15/13.					Dan Leach
OPS	BIO-8 2014	Provide an annual Payment to Friends of San Pablo Bay. The First Annual Payment shall be at least equal to \$2,693.00 + \$20,000 payment of good faith	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/14	NRG						Proof of payment submitted 5/30/2014 - via Email to C Remy-Obad on 9/16/16.					Dan Leach
OPS	BIO-8 2015	Provide an annual Payment to Friends of San Pablo Bay. The First Annual Payment shall be at least equal to \$2,693.00 + \$20,000 payment of good faith	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/15	NRG						Proof of payment submitted 5/29/2015 - via Email to C Remy-Obad on 9/16/16.					Dan Leach
OPS	BIO-8 2016	Provide an annual Payment to Friends of San Pablo Bay. The First Annual Payment shall be at least equal to \$3,036 + \$20,000 payment of good faith	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/16	NRG						Proof of payment submitted 5/31/2016 - via Email to C Remy-Obad on 8/11/16.					Dan Leach
OPS	BIO-8 2017	Provide an annual Payment to Friends of San Pablo Bay. The First Annual Payment shall be at least equal to \$3115 + \$20,000 payment of good faith	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/17	NRG											Dan Leach
OPS	BIO-8 2018	Provide an annual Payment to Friends of San Pablo Bay. The First Annual Payment shall be at least equal to \$3,218 + \$20,000 payment of good faith	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/18	NRG											Dan Leach
OPS	BIO-8 2019	Provide an annual Payment to Friends of San Pablo Bay. The Annual Payment shall be at least equal to \$3,311.00 (inflation adjusted)+ \$20,000 payment of good faith.	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/19	NRG											Dan Leach
OPS	BIO-8 2020	Provide an annual Payment to Friends of San Pablo Bay. The Annual Payment shall be at least equal to \$3,400.00 (inflation adjusted)+ \$20,000 payment of good faith.	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/20	NRG											Dan Leach
OPS	BIO-8 2021	Provide an annual Payment to Friends of San Pablo Bay. The Annual Payment shall be at least equal to \$3,527.00? (inflation adjusted)+ \$20,000 payment of good faith.	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/21	NRG											Dan Leach
OPS	BIO-8 2022	Provide an annual Payment to Friends of San Pablo Bay. The Annual Payment shall be at least equal to \$3,707.00? (inflation adjusted)+ \$20,000 payment of good faith.	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/22	NRG											Dan Leach
OPS	BIO-8 2023	Provide an annual Payment to Friends of San Pablo Bay. The Annual Payment shall be at least equal to \$4,095.00? (inflation adjusted)+ \$20,000 payment of good faith.	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/23	NRG											Dan Leach
OPS	BIO-8 2024	Provide an annual Payment to Friends of San Pablo Bay. The Annual Payment shall be at least equal to \$4,263.00? (inflation adjusted)+ \$20,000 payment of good faith.	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/23	NRG											David Frandsen

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OPS	BIO-8 2025	Provide an annual Payment to Friends of San Pablo Bay. The Annual Payment shall be at least equal to \$4,421,000? (inflation adjusted)- \$20,000 payment of good faith.	Provide written verification to the CPM, USFWS, and CDFG that first annual payment was made. Thereafter within 30 days of the each commencement anniversary date provide written verification of payment to parties above	30 days after the COD anniversary	5/31/23	NRG										David Frandsen
OPS	HAZ-1	Do not use any hazardous material in any quantity or strength not listed in Appendix B unless approved in advance by the CEC CPM.	Provide to the CPM, in the Annual Compliance Report, a list of hazardous materials contained at the facility.	Annually	Include in the ACR	NRG	6/25/13 Submittal 165 O&M HMRP to the CEC									David Frandsen
OPS	HAZ-8b	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. Also include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.	Provide information for inclusion in annual compliance report.	Annually	Include in the ACR	NRG			Reports submitted annually.							Dan Leach
OPS	Soil & Water- 5b	During operation a monitoring reports provided to DDSO shall also be provided to the CPM.	Submit any wastewater quality monitoring reports required by DDSO, and a full explanation of corrective actions taken if a violation occurs to the CPM in the annual compliance report	Annually	Include in the ACR	NRG			Reports submitted annually.							David Frandsen
OPS	Soil & Water- 5c	Notify the CPM of any violations of discharge limits	Submit any notice of violations from DDSO to the CPM and fully explain the corrective actions taken in the annual compliance report	Within 10 days of receipt of violation	As required	NRG										David Frandsen
OPS	Soil & Water- 6b	Monitor and track the water use by operating the water metering devices for the life of the project. Differentiate between groundwater, potable water, and recycled water. Water use should not exceed 50 AFY from any source	Provide (1) a report on the service testing and calibration of the metering devices, (2) a water use summary report which is based on and distinguished between groundwater, potable water and recycled water, (3) Copies of meter records for the City of Antioch documented the volume of potable water supplied over the previous year as specified (4) Brackish groundwater sample laboratory test results (1 in years where ground water is used) (5) data or info describing the water conservation program w/ estimates of the annual water saved in the ACR	Annually	Include in the ACR	NRG			Reports submitted annually.							Dan Leach
OPS	Soil & Water- 6a	If Primary Alternative water source ( City of Antioch Water) is being used in operation, Pay an annual fee of \$1,000/ AF of City of Antioch Water consumed annually	Calculate the annual use payment at the rate of \$1,000/ AF of fresh water reported annual in in the ACR. Pay the amount confirmed by the CPM	No later than 60 days following the approval of the ACR	As required	NRG			Paid annually in May.							Dan Leach
OPS	VIS-1c	Ensure proper treatment maintenance for the life of the project.	Provide a status report regarding surface treatment maintenance in the ACR which specifies the items in the condition	Annually	Include in the ACR	NRG			Reports submitted annually.							Dan Leach
OPS	VIS-2c	Maintain landscaping, including any needed irrigation and annual or semi annual debris removal for the life of the project	Report landscaping maintenance activities, including replacement of dead or dying vegetation for the previous year of operation in the ACR	Annually	Include in the ACR	NRG			Reports submitted annually.							Dan Leach
OPS	WASTE-7b	Update the Operation Waste Management Plan as necessary to address current waste generation and management practices.	Document in each ACR 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	Annually	Include in the ACR	NRG			Reports submitted annually.							David Frandsen
OPS	WASTE-8	Ensure that all spills or releases of hazardous substances, hazardous materials, or hazardous waste are documented and cleaned up and that wastes generated from the release/spill are properly managed and disposed of, in accordance with all applicable federal, state, and local requirements. Document management of all unauthorized releases and spills of hazardous substances, hazardous materials, or hazardous wastes that occur on the project property or related linear facilities as specified in the condition.	Provided to the CPM unauthorized release/spill documentation	Within 30 days of the date the release was discovered.	As required	NRG										David Frandsen
OPS	WASTE-9	Notify the CPM of any impending waste management-related enforcement action by any local, state, or federal authority taken or proposed to be taken against the project itself, or against any waste hauler or disposal facility or treatment operator with which the owner contracts that may be related to management of project wastes	Notify the CPM in writing and provide a description and timeline for steps to be taken to address the action.	Within 10 days of becoming aware of an impending enforcement action	As required	NRG										David Frandsen
PC-1	AQ-SC1	Designate and retain an on-site AQCCM who shall be responsible for directing and documenting compliance with conditions AQ-SC3, AQ-SC4 and AQ-SC5 for the entire project site and linear facility construction. The on-site AQCCM may delegate responsibilities to one or more AQCCM delegates.	Submit to the CPM for approval the name, resume, qualifications, and contact information for the on-site AQCCM and all AQCCM delegates. The AQCCM and all delegates must be approved by the CPM before the start of ground disturbance.	60 days prior to the start of ground disturbance	1/24/11	GenOn	9/13/2010 Submittal 001	2010-1172	Approved 9/23/2010 Resume for Stephen Erickson submitted 8/15/2012 Submittal 116	9/13/2010 Resume for Stephen Erickson submitted 8/15/2012	Approved 9/23/2010 by email (On File) from CEC: J. Caswell					Stephen L. Erickson
PC-1	AQ-SC2	Provide, for approval, an AQCCMP that details the steps to be taken and the reporting requirements necessary to ensure compliance with conditions of certification AQ-SC3, AQ-SC4 and AQ-SC5.	Submit the AQCCMP to the CPM for approval. The CPM will notify the project owner of any necessary modifications to the plan within 30 days from the date of receipt. The AQCCMP must be approved by the CPM before the start of ground disturbance.	60 days prior to the start of any ground disturbance	1/24/11	GenOn	9/21/2010 Submittal 002	2010-1220	Approved 10/06/10	9/21/10	Approved 06/10/2010 by email (On File) from CEC: J. Caswell					Stephen L. Erickson
PC-1	BIO-1	Assign a Designated Biologist to the project. The DB must meet the specified qualifications. No site or related facility activities shall commence until an approved Designated Biologist is available to be on site. Adhere to condition specification if the DB needs to be replaced	Submit the resume of the proposed DB, with at least 3 references and contact information, to the (CPM) for approval.	At least 30 days prior to the start of any site (or related facilities) mobilization	11/17/10	GenOn	10/26/2010 Submission 002 & 0128/020	2010-1221 Returned 10/6/2010	Approved 10/20/2010 Addnl resumes submitted 2/7/2012 Approved addnl monitors 2/24/12	9/21/2010	CEC approval per CEC Blue sheet report dated 10-06-10 (on file)					Stephen L. Erickson
PC-1	BIO-4a	Develop and implement a CPM-approved Worker Environmental Awareness Program (WEAP) in which each of its employees, as well as employees of contractors and subcontractors who work on the project site or any related facilities during site mobilization, ground disturbance, grading, construction, operation, and closure are informed about sensitive biological resources associated with the project. The WEAP must have the specified 1. through 6. of the condition.	Provide to the CPM the proposed WEAP and all supporting written materials and electronic media prepared or reviewed by the DB and a resume of the person(s) administering the program.	60 days prior to the start of any site (or related facilities) mobilization	12/17/10	BIOLOGIST	10/26/2010 Submittal 009 Resubmit WEAP Handout 12/21/2010 Submittal 023 Submittal 029 Submittal 030 1/28/2011	2010-1490 2010-1790 12/3/2010	Additional Information Submitted 12/3/2010 WEAP handbook revised 1/24/2011 Submitted WEAP training video 1/26/2011 Approved (No Date Given)	10/28/10	2/4/2011 Verified MCR No.5 2/11/2011					Stephen L. Erickson

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PC-1	BIO-4c	Deliver copies of final CPM approved WEAP materials to site.	Submit two copies of the CPM approved materials.	At least 10 days prior to site or related facilities mobilization	2/5/11	BIOLOGIST	1-28-11 Submittal 030 Submittal 032	2010-1490	Additional Information Submitted 12/3/2010 Approved 1/11/2011 Additional copies sent per request of Ann Crisp 1/28/2011		10/26/2010	1/11/2011 Delivery to site Verified by Project delivery records submitted to CEC no approval required				Stephen L. Erickson
PC-1	BIO-5	Prepare the proposed BRMMP (see BIO-6 for detailed requirements of the BRMMP).	Submit two copies of the BRMMP to the CEC CPM for review and approval and to USFWS/CDFG for review and comment	At least 60 days prior to site or related facilities mobilization	12/17/10	BIOLOGIST	10/19/2010 Submittal 006 Resub 11/18/2010 Submittal 014 & Submittal 020 Submittal 030	21010-1362 11/3/10 2010-1679 11/18/2010	Additional Information Submitted 12/3/2010 Additional copy sent per request of Ann Crisp 1/28/2011 Approved (No Date Given)		10/13/10	2/4/2011 Verified MCR No.5 2/11/2011				Stephen L. Erickson
PC-1	CUL-1a	Obtain the services of a Cultural Resources Specialist (CRS), and one or more alternate CRSs, if alternates are needed	Submit resumes to the CEC CPM for review and approval.	At least 30 days prior to start of ground disturbance	2/23/11	GenOn	9/29/2010 Submittal 003	2010-1261 returned 10/4/10	Approved 10/4/2010 Approved Karin Beck as ACRS 2/24/12		9/29/2010	CEC Acceptance resumes on 10/5/2010 verified by email from J Caswell (On File) Additionally verified by implied acceptance of section 4.0 of MCR's No.2 No. 14 & MCR No.18				Stephen L. Erickson
PC-1	CUL-1c	Provide a letter naming anticipated CRMs for the project and stating that the identified CRMs meet the minimum qualifications for cultural resources monitoring required by this Condition.	Provide the required written documentation to the CPM.	At least 20 days prior to ground disturbance	3/5/11	GenOn	10/7/2010 Submittal 004 3/30/2012 Submittal 042 8/31/11 9/13/2011 11/14/2100 Submittal 075 1/30/2011 Submittal 079 2/8/12 Submittal 089 2/10/12 Submittal 090	10/12/2010	Approved 10/12/2010 Submitted Ms. Kathleen Kubal 8/31/2011 Submitted Mr. Jay Baker 9/13/2011 Submitted Alexandra Greenwald 11/14/2011, Submitted Joseph Belk 11/30/2011 Approval 10/12/2011		10/7/2010	CEC Acceptance resumes on 10/5/2010 verified by email from J Caswell (On File) Additionally verified by implied acceptance of section 4.0 of MCR's No.2 No. 14 & MCR No.20				Stephen L. Erickson
PC-1	CUL-1e	Confirm in writing to the CPM that the approved CRS will be available for onsite work and is prepared to implement cultural resources conditions.	Provide the required written documentation to the CPM.	At least 10 days prior to the start of ground disturbance	3/15/11	GenOn	10/7/2010 Submittal 004	2010-1261	Approved (No Date Given)		10/7/10	CEC Acceptance resumes on 10/5/2010 verified by email from J Caswell (On File) Additionally verified by implied acceptance of section 4.0 verified MCR No.5 2/11/2011				Stephen L. Erickson
PC-1	CUL-2a	Provide to the CRS, if the CRS has not previously worked on the project, copies of the AFC, data responses, confidential cultural resources reports, all supplements and the SA for the project. Also provide site maps and drawings for cultural resource planning activities.	Provide requested info to the CRS.	At least 30 days prior to the start of ground disturbance	2/23/11	GenOn	12/19/2010 Submittal 21	2010-1831	Approved (No Date Given)		12/10/10	2/4/2011 Verified MCR No.4				Stephen L. Erickson
PC-1	CUL-3a	Submit the Cultural Resources Monitoring and Mitigation Plan (CRMMP), as prepared by the CRS. (See condition for specific requirements.)	Submit the entire CRMMP to the CEC CPM for review and approval.	At least 30 days prior to ground disturbance	2/23/11	CULTURAL SPECIALIST	10/26/2010 Submittal 010 Revised 11/2/2010 Submittal 030	2010-1485 2010-1566	Approved 1/11/2011		10/26/10	1/11/2011 Verified MCR No.5 2/11/2011				Stephen L. Erickson
PC-1	CUL-3b	Agree to pay curation fees for any materials collected as a result of the archaeological investigations (survey, testing, data recovery)	Provide the required written documentation to the CPM.	At least 30 days prior to ground disturbance	2/23/11	GenOn	10/26/2010 Submittal 007	2010-1485	Approved 1/11/2011		10/26/10	1/11/2011 Verified MCR No.5 2/11/2011				Stephen L. Erickson
PC-1	CUL-5a	The CRS shall prepare a WEAP that addresses all issues specified in Condition and provided training to all new workers within their first week of employment at the project site, laydown areas, and along the linear facilities routes.	Provide the draft text and graphics for the training program to the CPM for review and approval.	At least 30 days prior to ground disturbance	2/23/11	CULTURAL SPECIALIST	10/26/2010 Submittal 007 Submittal 023 Submittal 029 Submittal 032 1/26/2011	2010-1362	Approved 12/10/2010 Submitted WEAP training Video 1/26/2010 Final version sent with the word DRAFT removed 1/28/2011		10/26/2010	12/10/2010 Approved by Email (on file) from J Caswell CEC				Stephen L. Erickson
PC-1	CUL-7a	Grant authority to halt construction to the CRS, alternate CRS and the CRMs in the event previously unknown cultural resource sites or materials are encountered, or if known resources may be impacted in a previously unanticipated manner (discovery).	Provide the CPM 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 CPM 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.	At least 30 days prior to ground disturbance	2/23/11	GenOn	10/26/2010 Submittal 007	2010-1487	Approved 1/11/2011		10/26/10	1/11/11				Stephen L. Erickson
PC-1	NOISE-1	Notify all residents within one mile of the site and one-half mile of the linear facilities, by mail or other effective means, of the commencement of project construction. Establish a telephone number for use by the public to report any undesirable noise conditions associated with the construction and operation of the project and include that telephone number in the above notice. The telephone number shall be posted at the project site during construction in a manner visible to passersby and maintained until project has been operational for one year.	Transmit to the CPM 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, verifying that the telephone number has been established and posted at the site, and giving that telephone number.	At least 15 days prior to the start of ground disturbance	3/10/11	GenOn	12/14/2010 Submittal 22	2010-1903	Approved (No Date Given)		12/14/10	2/4/2011 Verified as accepted in MCR MCR No.4 MCR 17 MCR No. 21				Stephen L. Erickson

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PC-1	NOISE-3	Submit a noise control program and statement signed by project manager verifying that noise control program will be implemented throughout construction of the project. The noise control program must comply with applicable OSHA and Cal-OSHA standards.	Submit a noise control program and project manager's verification letter to the CEC CPM for review and approval.	At least 30 days prior to ground disturbance	2/23/11	KIEWIT	11/19/2010 Submittal 016 1/4/11 to the CBO	2010-1727	Approved 12/15/2010		11/19/2010	CEC acceptance per email (TN2010-1727) 12/15/2010. Also Verified as accepted MCR No.4				Raja Ponniah
PC-1	NOISE-6	Heavy equipment operation and noisy construction work relating to any project features, including pile driving, shall be restricted to the times delineated below, unless a waiver has been issued by the City of Antioch for alternative construction hour limitations (specified to be Monday through Saturday 6:00 a.m. to 7:00 p.m., and Sundays and holidays 9:00 a.m. to 5:00p.m.); Mondays through Fridays: 7:00 a.m. to 6:00 p.m. Weekends and holidays: 9:00 a.m. to 5:00 p.m. Haul trucks and other engine-powered equipment shall be equipped with adequate mufflers. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use shall be limited to emergencies.	Transmit to the CPM a statement, signed by the project owner's project manager, acknowledging that the above restriction will be observed throughout the the constructio of the project. If waiver is issued by the city it should be provided to the CPM for review and approval. also verified MCR No.4 MCR 17 MCR No. 21	Prior to Ground Disturbance	2/23/11	KIEWIT	11/19/2010 Submittal 016 5/5/2011 Submittal 047 5/19/2011 Submittal 049 12/29/2011 Submittal 083 April 27, 2012 Submittal 099	2010-1728	Approved 12/15/2010 4/22/2011 Submitted request for Waiver for well drilling and foundation pours. 5/19/2011 Submitted request for waiver for well drilling in July and Aug. Submitted hours for 0700-2400 12/29/2011 Approved 1/9/12. Submitted Admitt work hour request 4/27/2011. Approved 5/4/2012.		11/19/2010	Approved by CEC 12/15/10 by email from J Caswell (TN2010-1728) also 5/4/2012. with suspension Approval received per teleconference and verified by email 9.14.12. Also verified MCR No.4 MCR 17 MCR No. 21			Raja Ponniah	
PC-1	PAL-3a	Provide the CPM with the resume and qualifications of the Paleontological Resource Specialist (PRS) for review and approval.	Submit the resume, references, and statement of availability to the CPM for review and approval.	At least 60 days prior to ground disturbance	1/24/11	GenOn	9/29/2010 Submittal 003 4/22/2011	2010-1260 10/5/2010	Approved 9/30/2010 New Monitor Annette Cornelius 8/12/2011 submitted resume for Teresa Butler.		9/29/2010	11/29/2010 Email acceptance from CEC (On File) Also Verified as accepted per Section 4.0 in MCR No.2 with suspension Approval received per teleconference and verified by email 9.14.12			Stephen L. Erickson	
PC-1	PAL-3b	Provide a letter with resumes naming anticipated monitors stating they meet minimum quals for monitoring.	Submit the requested info to the CPM .	At least 20 days prior to ground disturbance	3/5/11	GenOn	11/2/2010 Submittal 003 Submittal 010 Submittal 045 Submittal 056	2010-1565	Approved (No Date Given)		11/2/2010	11/29/2010 email acceptance from CEC (On File) also per section 4.0 MCR No.5 on 2/4/2011 & 2/4/2011			Stephen L. Erickson	
PC-1	PAL-2	Provide to the PRS and the CPM, for approval, maps and drawings showing the footprint of the power plant, construction laydown areas and all related facilities.	Provide maps and drawings to the PRS and CEC CPM	At least 30 days prior to ground disturbance	2/23/11	GenOn	12/2/2010 Submittal 21		Approved (No Date Given)		12/2/2010	2/4/2011 Verified as accepted MCR No.5 - 2/1/2011 with suspension Approval received per teleconference and verified by email 9.14.12			Stephen L. Erickson	
PC-1	PAL-3	The PRS shall prepare and submit a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) to identify general and specific measures to minimize potential impacts to significant paleontological resources.	Provide the PRMMP to the CEC CPM, including an affidavit of authorship by the PRS and acceptance of the PRMMP by the project owner evidenced by a signature.	At least 30 days prior to ground disturbance	2/23/11	PRS	11/4/2010 Submittal 011 Final 12/14/2010 Submittal 022	2010-1577	Amended 7/26/10 Affidavit not required. Approved 12/21/2010		11/4/2010	CEC Acceptance by Email from J Caswell 11/29/2010 (On File) Additional Verifications/acceptances of section 4.0 of MCR No. 3 with suspension Approval received per teleconference and verified by email 9.14.12			Stephen L. Erickson	
PC-1	PAL-4	If deemed needed, the PRS shall prepare and conduct weekly CPM-approved training for all project managers, construction supervisors and workers who are involved with or operate ground disturbing equipment or tools.	Provide the WEAP materials to the CPM including: brochure, reporting procedures, script, and final video.	At least 30 days prior to ground disturbance	2/23/11	PRS	10/26/2010 Submittal 008 Submittal 023 Submittal 029 Submittal 032 1/26/2011	2010-1489	APPROVED ON GOING 11/29/2010 Submitted WEAP training video 1/26/2011 Unapproved with combination of all 3 ology sections into one booklet, 2/1/2011 Returned for		10/26/2010	CEC Acceptance by Email from J Caswell 11/29/2010 (On File) Additional Verifications/acceptances of section 4.0 of MCR			Stephen L. Erickson	
PC-1	Soil & Water- 1a	Coordinate with the Water Board as necessary develop and implement a construction SWPPP	Submit to the CPM copies of all correspondence with the Water Control Board regarding the SWPPP within 10 days of receipt.	No later than 30 days prior to start of site mobilization	1/16/11	KIEWIT	1/5/2011 Submittal 025		Approved (No Date Given)		1/5/2011	2/4/2011 Verified MCR No.6 3/14/2011		RWQCB	Raja Ponniah	
PC-1	Soil & Water- 1b	Develop and implement a Storm Water Pollution Prevention Plan (construction SWPPP) for the LEO site, laydown areas, and on-site linear facilities. Submit to the CPM a copy of the construction SWPPP. Info should include a copy of the Notice of Intent for Compliance with the General NPDES permit.	Submit to the CPM a copy of the NOTICE OF INTENT FOR COMPLIANCE with the General NPDES permit.	No later than 60 days prior to site mobilization	12/17/10	KIEWIT	1/5/11		Approved (No Date Given)		12/1/2010	2/4/2011 Verified MCR No.6 3/14/2011			Raja Ponniah	
PC-1	Soil & Water- 2a	Obtain CPM approval for a site-specific Drainage, Erosion, and Sedimentation Control Plan (DESCP)	Submit a copy of the DESCOP to the CPM along with evidence from Contra Costa County that the DESCOP meets the requirements of Contra Costa Clean Water Program.	No later than 30 days prior to the start of site mobilization	1/16/11	KIEWIT	1/24/2011 Submittal 028	2011-0158	Approved (No Paperwork Given)		12/1/2010	2/4/2011 Verified MCR No.6 3/14/2011		Contra Costa County	Raja Ponniah	
PC-1	TRANS-1	In coordination with Contra Costa County Public Works Department, develop and implement a construction traffic control plan to include the items specified within the condition	Provide CCCPW and the city of Antioch Engineering Department for review and comment the construction traffic control plan. Provide to the CPM the construction control plan and the CCPW and the City of Antioch Engineering Departments comments for review and approval.	At least 60 days prior to the start of site mobilization	12/17/10	KIEWIT	11/18/2010 Submittal 015 1/5/2011 Submittal 024 Submittal 031 Submittal 033 1/31/2011	2010-1685 2011-0219	Returned for additional informatio 12/13/2010. Resubmitted 1/5/2011 Resubmitted additional information 1/31/2011 Resubmitted the plan in the CEC suggested format 2/1/2011		11/18/2010	2/8/2011 Verified by Email from C Stora on 9/18/2012		Contra Costa County Public Works Department and City of Antioch Engineering Department	Raja Ponniah	

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Sort Code	Cond. #	Description of Project Owner's Responsibilities	Verification/Action/Submittal Required by Project Owner	Timeframe	Date Due to CEC CPM	Lead Party	Date sent to CEC, CBO or agency	CEC Log # and Status	Comments	Date Submitted to GenOn	Date sent to CEC, CBO or agency2	Approved	CPM	CBO	Other	Responsible Party
PC-1	TRANS-2a	Prepare a mitigation plan for Wilbur Ave should it be damaged by project construction. Should ensure that if damage occurs it will be repaired to original condition. The plan include the condition specified items ( Photographic/ videotape evidence of pre construction condition is req)	Submit a mitigation plan focused on restoring the local identified roads to its pre-project condition to the City of Antioch for review and comment and to the CPM for Review and approval.	At least 90 days prior to the start of any site (or related facilities) mobilization	11/17/10	KIEWIT	11/18/2010 Submittal 015	2010-1686	Approved 2/4/2011 No Paperwork Given	11/18/2010	2/4/2011 Verified MCR No.6 3/14/2011				City of Antioch Engineering Department	Raja Ponniah
PC-1	WASTE-1a	Comply with BAAQMD Regulation 11, rule 2 req for management and disposal of asbestos contain material removed during project demolition.	Provide to the CPM copies of the BAAQMD notification materials, acknowledgment letter and job number assigned by the BAAQMD for review and approval	No less than 10 day prior to commencement of project related demolition	1/7/11	K&G	1/24/2011 Submittal 028		Approved 1/31/2011 No Paperwork	1/24/2011	1/31/2011 Verified MCR No. 5 2/11/2011				BAAQMD	Raja Ponniah
PC-1	WASTE-2	Complete a lead-based paint survey of all structures to be demolished and ensure that project related demolition debris contain lead based paint is properly managed and disposed of in accordance with all applicable LORS	Verification: At least 30 days prior to the start of project-related demolition, the project owner shall submit to the CPM for review and approval a copy of the lead-based paint survey conducted for the project site. The project manager shall also provide to the CPM a description of the procedures to be employed during demolition to ensure that lead-based paint debris and wastes are managed in accordance with all applicable LORS.	At least 30 days prior to the start of project-related demolition	1/16/11	GenOn	1/5/2011 Submittal 025	2011-0137	Approved 1/31/2011 No Paperwork	1/5/2011	1/31/2011 Verified in MCR No. 21					Kirk Emmons
PC-1	WASTE-3	Provide the resume of a Registered PE or Geologist, who shall be available for consultation during site characterization (if needed), excavation and grading activities.	Submit resume to CPM for approval. Provide to the CPM a copy of the contract with the approved professional Engineer/Geologist prior to start of project related demolition	At least 30 days prior to site mobilization	1/16/11	KIEWIT	11/24/2010 Submittal 017	2010-1730	Approved 1/18/2011	12/1/2010	11/24/2010	1/18/2011 Verified in MCR No. 21				Raja Ponniah
PC-1	WASTE-5a	Comply with all applicable provisions of the city of Antioch's Construction and Demolition Debris Recycling Ordinance No. 1018-C.S., including preparation of a Construction and Demolition Debris Recycling Ordinance Waste Management Plan for all wastes generated during project demolition and construction activities.	At least 45 days prior to the start of project-related demolition, the project owner shall submit to the city a draft Construction and Demolition Debris Recycling Ordinance Waste Management Plan for review and comment. Submit to the CPM for review and approval the draft Waste Management Plan and any comments on the plan provided by the city	Not less than 15 days prior to the start of project-related demolition	4/16/13	KIEWIT	12/02/2010 Submittal 013 to City 12/03/2010 to CEC Resubmit to CEC 12/21/2010 Submittal 19 Submittal 023	2010-1784 2010-1927	Approved 1/31/2011 No Paperwork	11/18/2010	12/2/2010	1/31/2011 Verified MCR No. 5 2/11/2011			City of Antioch Engineering Department	Raja Ponniah
PC-1	WASTE-6a	Obtain a hazardous waste generator identification number from the United States Environmental Protection Agency prior to generating any hazardous waste during construction.	Keep a copy of the identification number on file at the project site and provide the number to the CPM.	Prior to start of construction	5/1/13	K&M	11/16/2010 Submittal 013 Submittal 054	2010-1665	Approved 7/22/2011	11/16/2010		CEC Acceptance 11/18/2010 By J Caswell Re-Verified By Email from C Stora on 9/18/12	Approved			Raja Ponniah
PC-1	WASTE-10	Ensure that the Marsh Landing Generating Station site is properly characterized so as to be able to identify hazardous wastes present at the project site. The project owner shall work closely with PG&E and Ensure that PG&E follows any and all directives issued by the California EPA Department of Toxic Substances Control (DTSC) to characterize, assess, and remediate the project site. No soil excavation or grading shall commence until the CPM gives approval	Provide the CPM for review and approval all project-related plans, results, and assessments provided by PG&E to DTSC and all obtainable project-related written correspondence between DTSC and PG&E	At least thirty (30) days prior to the start of any soil excavation or grading	2/23/11	GenOn	1/12/2010 Submittal 018 Submittal 024 Submittal 038 6/28/2011 Submittal 052 Submittal 053 Submittal 054	2010-1738 returned 12/13/2010 2011-0144	Pending DTSC approval of plan letter. Additional correspondence provided 1/5/2011 (Not plan letter.) Approved 2/7/2010 Addnl sent 6/28/2011 Approved Corrective Measures Completion Report and final Revision 7/27/2011.	11/29/2010		2/7/2011 Verified MCR No.6 3/14/2011				Stephen L. Erickson
PC-1	WORKER SAFETY-3a	Provide a site Construction Safety Supervisor (CSS) who, by way of training and/or experience, is knowledgeable of power plant construction activities and relevant laws, ordinances, regulations, and standards, is capable of identifying workplace hazards relating to the construction activities, and has authority to take appropriate action to assure compliance and mitigate hazard	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.	At least 30 days prior to the start of construction	3/20/11	KIEWIT	11/18/2010 Submittal 13 Kiewit Submittal 015		CEC approval per email from J Caswell on 11/16/10	11/18/2010		2/4/2011 Verified MCR No.6 3/14/2011				Raja Ponniah
PC-1	WORKER SAFETY-5a	Ensure that a portable automatic external defibrillator (AED) is located on site during demolition & construction, and shall implement a program to ensure that workers are properly trained in its use and that the equipment is properly maintained and functioning at all times.	Submit to the CPM proof that a portable automatic external defibrillator (AED) exists on site and a copy of the training and maintenance program for review and approval.	At least 30 days prior to the start of construction	12/2/10	KIEWIT	11/24/2010 Submittal 013 and 017 Kiewit		CEC approval per email from J Caswell on 11/16/10	11/30/2010	11/24/2010	2/4/2011 Verified MCR No.6 3/14/2011				Raja Ponniah
PC-2	AQSC7	Provide emission reductions in the form of offsets or emission reduction credits (ERCs) in the quantities of at least 78.83 tons per year (tpy) NOx, 14.23 tpy VOC, 31.57 tpy PM10, and 4.96 tpy SOx emissions. The project owner shall demonstrate that the reductions are provided in the form required by the Bay Area Air Quality Management District. The project owner shall surrender the ERCs from among Bay Area Air Quality Management District Certificate Numbers 756, 831, 863, and 918, or a modified list, as allowed by this condition. If additional ERCs are submitted, the project owner shall submit a modified list including the additional ERCs to the CPM. The project owner shall request CPM approval for any substitutions, modifications, or additions to the listed credits.	Submit to the CPM records showing that the project's offset requirements have been met prior to initiating construction. If the CPM approves a substitution or modification to the list of ERCs, the CPM shall file a statement of the approval with the project owner and the Energy Commission docket. The CPM shall maintain an updated list of approved ERCs for the project.	Prior to Initiating Construction	4/1/13	GenOn	10/13/2010 Submittal 006	2010-1361	Approved 10/29/2010	10/13/2010	10/13/2010	CEC Acceptance 11/01/2010 per email from J Caswell (On File) and Additional verifications per acceptance of section 4.0 of MCR No. 14				Peter Landreth
PC-2	BIO-7	Conduct migratory bird pre-construction nest surveys as required by condition. 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.	Provide the CPM a letter-report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identify and qualifications of the surveyor(s); and a list of species observed. Additional copies shall be provided to CDFG.	At least 10 days prior to site or related facilities mobilization	2/5/11	BIOLOGIST	3/8/2011 Submission 038 3/13/2012 Submission 041 5/21/2013 Submittal 105 7/13/12 Submittal 112		Approved, but ongoing review required. Request to remove hawk nest submitted 3/13/2012	3/8/2011	3/8/2011	3/28/2011				Stephen L. Erickson
PC-2	CIV-1a	Submit design of the proposed drainage structures and the grading plan.	Submit documents to the CBO for review and approval.	At least 30 days prior to the start of site grading	2/23/11	KIEWIT	2/19/2011 to CEC and CBO Submittal 37		CBO comments 3/10/11 Approved 3/29/2011	2/19/2011	To the CBO 2/18/11	3/29/2011 Verified MCR No.7 4/16/2011				Kyle Stuckenholtz
PC-2	CIV-1b	Submit the erosion and sedimentation control plan.	Submit documents to the CBO for review and approval.	At least 30 days prior to the start of site grading	2/23/11	KIEWIT	2/19/2011 to CEC and CBO Submittal 37		Approved 3/28/2011	2/19/2011	To the CBO 2/18/11	3/29/2011 Verified MCR No.7 4/16/2011				Kyle Stuckenholtz
PC-2	CIV-1c	Submit the storm water pollution prevention plan (SWPPP).	Submit documents to the CBO for review and approval.	At least 30 days prior to the start of site grading	3/20/11	KIEWIT	2/19/2011 to CEC and CBO Submittal 37		CBO comments 3/10/11 Approved 3/28/2011	2/19/2011	To the CBO 3/2/11	3/28/2011 Verified MCR No.7 4/16/2011				Kyle Stuckenholtz



Color Code Key:

Pre-Const	Construction	Commiss.	Operations	To CEC or Agency	Approved by CEC
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PC-2	ENV-1d	Submit related calculations and specifications, signed and stamped by the responsible civil engineer.	Submit documents to the CBO for review and approval.	At least 30 days prior to the start of site grading	2/23/11	KIEWIT	2/19/2011 to CEC and CBO Submittal 37		CBO comments 3/10/11 Approved 3/28/2011	2/19/2011	To the CBO 2/21/11	3/28/2011 Verified MCR No.7 4/16/2011				Kyle Stuckenholz
PC-2	ENV-1e	Submit the soils, geotechnical, or foundation investigations reports required by the 2007 CBC.	Submit documents to the CBO for review and approval.	At least 30 days prior to the start of site grading	2/23/11	KIEWIT	2/19/2011 to CEC and CBO Submittal 037		CBO comments 3/10/11 Approved 3/28/2011	2/19/2011	To the CBO 2/18/11	3/28/2011 Verified MCR No.7 4/16/2011				Reid Strain
PC-2	GEN-2a	Furnish the CPM and the CBO with a schedule of facility design submittals, and master drawings and master specifications list. The master drawings and master specifications list shall contain a list of proposed submittal packages of designs, calculations, and specifications for major structures, systems, and equipment. The schedule shall contain the planned date of each submittal to the CBO. Provide specific packages to the CPM upon request. Also plans and calculations for all construction work shall be submitted to the CBO for approval.	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.	At least 60 days prior to the start of rough grading	1/24/11	KIEWIT	1/19/2010 Submittal 016 1/4/11 to the CBO	2010-1726	Approved 12/15/2010	11/18/2010	11/19/2010	CEC Acceptance Per email from J Cowell on 12/15/10 (TN2010-1726) Additionally Verified on MCR No. 4	Approved			Sarah Copeland
PC-2	GEN-4	Assign a California registered architect, or a structural or civil engineer as the resident engineer (RE) in charge of the project.	Submit to the CBO for review and approval, the resume and registration number of the RE and any other delegated engineers assigned to the project. Notify the CPM of the CBO's approvals of the RE and other delegated engineer(s) within five days of the approval.	At least 30 days prior to the start of rough grading	2/23/11	KIEWIT	12/3/2010; To CBO 1 26-11 Submittal 019 Submittal 036	2010-1785	Approved (No Date Given)	11/19/10	12/3/10	2/4/2011 Verified on MCR No. 5 2/11/2011		2/9/2011		Gene Amrhein
PC-2	GEN-5	Assign at least one of each of the following California registered engineers to the project: a civil engineer, a soils, geotechnical, or civil engineer experienced and knowledgeable in the practice of soils engineering; and an engineering geologist, a design engineer who is either a structural engineer or a civil engineer fully competent and proficient in the design of power plant structures and equipment supports; a mechanical engineer; and an electrical engineer.	Submit to the CBO for review and approval, resumes and registration numbers of the responsible engineers. Notify the CPM of the CBO's approvals of the responsible engineers within five days of the approval.	At least 30 days prior to the start of rough grading	2/23/11	KIEWIT	To CBO 1/17/11 To CEC 2/16/2011 Submittal 036 6/28/2011 addnl Submittal 052 Submittal 057		CBO Approved 2-16-11 CEC Approved 3/16/2011 Submitted Tharu Nadaraj (Electrical) and Chad Enders (Civil) for approval 6/28/2011 Mr. Nadaraj and Mr. Enders resumes approved 8/12/11 Submitted Gen Amrhein, Chad Enders and Shong Liu for Design Engineer 8/15/2011	11/30/10	1/17/11	2/16/2011 Verified through CBO Returns and MCR No.7 4/16/2011		2/15/2011	Jake Albers	
PC-2	SEQ-1	Specifically include in the Soils and Engineering Report, laboratory test data, associated geotechnical engineering analyses, and a thorough discussion of the potential for liquefaction and associated lateral spread, and dynamic compaction. The report should also include recommendations for ground improvement and/or foundation systems necessary to mitigate these potential geologic hazards, if present.	Include in the application for a grading permit a copy of the Soils Engineering Report which address the potential for liquefaction and associated lateral spread; settlement due to compressible soils, dynamic compaction; and the possible presence of expansive clay soils, and a summary of how the results of the analysis were incorporated into the project foundation and grading plan design of review and comment by the Chief Building Official ( CBO)	At least 30 days prior to the start of grading	2/23/11	KIEWIT	2/19/2011 to CEC and CBO Submittal 037		Approved 3/28/2011	2/18/11	2/19/11	3/28/2011 CEC agrees that all HAZ submittals made to date have been approved excepting HAZ-8 per email verification 8/24/12				Raja Ponniah Randy Dixon
PC-2	HAZ-7	Prepare a site-specific construction security plan for the construction phase which addresses the items in the Condition.	Notify the CPM that a site-specific construction security plan is available for review and approval.	At least 30 days prior to start of construction	4/1/13	KIEWIT	11/24/2010 Submittal 017	2010-1731	Approved (No Date Given)	11/30/10	11/24/10	2/4/2011 CEC agrees that all HAZ submittals made to date have been approved excepting HAZ-8 per email verification 8/24/12				Raja Ponniah
PC-2	SOCIO-1	Pay the one-time statutory school development fee to the Antioch Unified School District as required by Education Code Section 17620	Provide the CPM proof of payment of the fee	At least 30 days prior to start of project construction	4/1/13	GenOn	2/4/2011 Submittal 034 2/2/2012 Submittal 087		Approved (No Paperwork Given) Submitted additional payment 2/2/2012	2/4/2011	2/4/2011	2/9/2011 Verified MCR No.6 3/14/2011				Dawn Owens
PC-2	Soil & Water-2b	Coordinate with Contra Costa County to ensure that the DESCP meets local requirements for a post-construction Storm Water Control Plan.	The DESCP shall meet local requirements for a post-construction Storm Water Control Plan.	No later than 30 days prior to the start of construction.	3/20/11	KIEWIT	2/19/2011 Submittal 37		Approved 3/28/2011	11/29/2010	2/19/2011	3/28/2011 Verified MCR No.7 4/16/2011			Contra Costa County	Raja Ponniah
PC-2	TSE-2	Assign an electrical engineer and at least one of each of the following: a civil engineer; geotechnical engineer or a civil engineer experienced and knowledgeable in the practice of soils engineering; a design engineer who is either a structural engineer or a civil engineer and fully competent and proficient in the design of power plant structures and equipment supports; or a mechanical engineer.	Prior to the start of rough grading, the project owner shall submit to the CBO for review and approval, the names, qualifications, and registration numbers of all the responsible engineers assigned to the project. The project owner shall notify the CPM of the CBO's approvals of the engineers within five days of the approval. 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.	Prior to start of rough grading	2/23/11	KIEWIT	To CBO 1-27-11 To CEC 2/16/2011 Submittal 036 8/15/2011 Submittal 057 9/29/2011 Submittal 066	Verbalty approved (C.H.)	CBO Approved 2-16-11 CEC Approved 3/16/2011 Submitted Reid Strain for Design Engineer and Richard Jacober for Electrical Engineer 8/16/2011 9/29/2011 submitted Daren Phelps as EE. CEC Approved 10/5/11.	11/30/10	1/27/2011	3/16/11		2/16/2011	Jake Albers	
PC-2	WORKER SAFETY-1	Submit a copy of the Project Construction Safety and Health Program containing the following construction plans: PPE, Exposure Monitoring, IIPP, EAP, and FPP; provide a copy of a letter to the CPM from the CCC Fire Protection District stating the fire department's comments on the Construction Fire Prevention Plan and Emergency Action Plan.	The Safety Program, PPE, IIPP, and Exposure Monitoring Program shall be submitted to the CEC CPM for review and approval; the EAP and FPP shall be submitted to the CCC Fire Protection District for review and comment prior to submittal to the CPM for approval.	At least 30 days prior to start of construction	4/1/13	KIEWIT	1/11/2011 Submittal 026	2011-0111	Approved (No Paperwork Given)	11/19/2010	1/11/2011	2/7/2011 Verified MCR No.6 3/14/2011			Contra Costa County Fire Protection District	Raja Ponniah
PC-2	WORKER SAFETY-4	Make payments to the CBO for the services of a Safety Monitor (in addition to the other services provided by the CBO). Safety monitor shall be responsible for verifying that the construction safety supervisor implements all required Cal/OSHA and CEC safety requirements.	Provide proof of agreement to fund the safety monitor services to the CPM for review and approval.	Prior to the start of construction	4/1/13	GenOn	1/31/2011 Submittal 031	2011-0220	Provided CBO letter confirming service were covered by GenOn 1/31/2011 Approved 4/2/2011	1/31/2011	1/21/2011	2/4/2011 Verified MCR No.6 3/14/2011				Chuck Hicklin

# **Marsh Landing Generating Station**

## **Annual Compliance Report**

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### **2.0 Project Operating Status Summary**

MLGS began commercial operations May 1, 2013.

The Units ran through April of 2023 when called upon by CAISO/PG&E. From May of 2023 – Dec of 2025 the units were dispatched according to Market conditions. There were no significant operating status changes to the facility during the year.

Seven or eight-day summer readiness outages were performed on each unit during March 2025. Preventative Maintenance tasks were performed, and inspections conducted.

## Marsh Landing Generating Station

### Annual Compliance Report

### 3.0 Documents Required by Specific Conditions

The following table lists the Conditions of Certification that require annual input.

Condition of Certification	Description	Items Included	Subsection
BIO-2	Designated Biologist Duties & WEAP Training.	YES	3.1
HAZ-1	List of hazardous materials contained at the facility.	YES	3.2
HAZ-8	Site specific security plan statements.	YES	3.3
SOIL & WATER-5	Waste water reporting to DDS.	YES	3.4
SOIL & WATER-6	Potable water usage.	YES	3.5
VIS-1	Surface treatment of structures and buildings	YES	3.6
VIS-2	Landscaping activities	YES	3.7
WASTE-7	Waste management plan	YES	3.8
BIO-8 *	CWF Annual Report	YES	3.9

Note: \* added subsection starting with the 2016 ACR.

## **Marsh Landing Generating Station**

### **Annual Compliance Report**

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#### **3.1 BIO-2**

There was one Biological Resources Monitoring Reports for 2025 related to a bird nest that was discovered on site. (Please see the following report.)

There were no activities on site in 2025 that required WEAP training for contractors or employees, however we did have one new employee in 2025 and their attendance at WEAP training is documented on the page following the biological report on the bird nest.

- A. Biological Report
- B. WEAP training verification document

August 14, 2025

Mr. Joseph Moura  
Marsh Landing LLC  
3201-C Wilbur Avenue  
Antioch, CA 94509

**Subject: Report of August 6, 2025, House Finch Nest Inspection and Management Recommendations**

Dear Mr. Moura:

This letter report documents a bird nest inspection I conducted at Marsh Landing Generating Station (MLGS) on August 6, 2025. It includes sections describing background information, my site visit and observations, and management recommendations, followed by a summary and conclusion.

**Background**

In 2010, the California Energy Commission (CEC) certified MLGS and the Bay Area Air Quality Management District issued the Authority to Construct for MLGS. MLGS began commercial operations in 2013. Biological surveys and monitoring at MLGS are conducted by Biological Monitors approved by the CEC, and all biology work must be overseen by the approved Designated Biologist, consistent with the CEC's Conditions of Certification for MLGS. I have been the Designated Biologist for MLGS since it was certified by the CEC.

On July 21, 2025, MLGS Plant Manager Joe Moura contacted me about a bird nest at MLGS. During a routine site audit the California Public Utilities Commission (CPUC) raised concern about a bird nest seen under the eaves of a shade structure installed over Fuel Gas Chromatograph 0-FGS-SKD-04, at the north-central part of MLGS (Figure 1). In coordination with Joe Moura and David Frandsen, I visited MLGS to identify the bird nest, determine whether it was active, and provide nest management recommendations.

**Site Visit and Observations**

I visited MLGS on August 6, 2025, to observe the bird nest. After careful observation I determined the nest was an inactive house finch (*Haemorrhous mexicanus*) nest and I removed it. This section describes my observations.

Upon arrival the area with the nest was well demarcated with flagging and signs so that workers would not inadvertently disturb it. From 7:40 am to 8:40 am I sat still, approximately 30 feet from the nest, and quietly observed for 1 hour. I watched the nest consistently for this hour, both with and without binoculars, and had a clear view of the nest. Air temperature was approximately 62 degrees Fahrenheit, skies were clear, and there was a slight breeze; despite excellent conditions for observing activity in or around the nest, no birds or bird activity was observed near the nest.

After quiet observation, I erected a step ladder next to the nest and climbed the ladder for a closer inspection. I used a handheld mirror to look over the rim of the nest into its cup, which was empty. Using text descriptions and images in the field guides *Nests, Eggs, and Nestlings of North American Birds* (Baicich and Harrison, 2005) and *Western Birds' Nests* (Harrison 1979), I identified the nest as an inactive house finch (*Haemorrhous mexicanus*) nest. This identification was supported by comparing the condition of the nest to various images found online,

consistent with the habit of the house finch to allow fecal sacs and waste from the nest to accumulate around its rim. The nest at MLGS contained no eggs or chicks, but was completely covered in fecal sacs and waste (Figure 2), suggesting it was used successfully to fledge one or two broods in 2025.

**Figure 1. Approximate location of inactive house finch nest, August 6, 2025**



## Management Recommendations

Because the nest was inactive and was a source of concern to regulators, and therefore to MLGS, I removed the empty nest on August 6, 2025, immediately after confirming species identification and inactive status. Active house finch nests are protected under the Migratory Bird Treaty Act and California Fish and Game Code, but inactive house finch nests are not a protected resource. The house finch has an extensive range and is noted by the IUCN Red List as having an increasing population, categorized as “Least Concern.”

House finches are extremely tolerant of human activity. Human structures such as the eaves of the shade canopy at MLGS are among its preferred nest sites. During construction of MLGS, a house finch pair successfully fledged chicks from a nest constructed square in the middle of the active construction site, on the framework that eventually became one of the four on-site gas generators. They can build their nests in as little as 2 days. House finches may build a new nest at the same location as the one I removed, or nearby, and there are probably other house finch nests at MLGS that have gone undiscovered.

If a bird chooses to nest among ongoing activity such as operations at MLGS, then the ongoing activity is generally presumed to not affect the nest. Rather, it is new activity in the presence of an existing nest that may harm reproductive success. Therefore, and especially with a disturbance-tolerant species such as the house finch, a nest that is not in obvious conflict with operations may not be cause for biological concern. In the case of this nest, routine background noise in the nest vicinity includes the noise associated with compressors, motors, and/or generators routinely tuning on and off. Based on the species’ habits, the ongoing background noise and

disturbance, and the apparent success of this year's nest, it seems unlikely that operations at MLGS would cause harm to future nests at this or similar locations.

**Figure 2. Photographs of inactive house finch nest (a) location, and (b) nest structure with fecal sacs and waste**



If the CPUC or MLGS decide they must exclude birds from nesting under the eaves of the shade structure, spike strips, bird netting, or other exclusionary devices may prevent future nests at specific locations. However, this species has adapted to thrive within developed human environments and nest exclusion is not biologically warranted or feasible across a large area. Furthermore, it is possible that injury or entanglement due to exclusionary devices or simply removal of a suitable nest location could do more harm to the local bird populations than allowing nesting at locations they choose and are not in conflict with MLGS operations.

My recommendation is to take no further action related to nests that may develop at this or similar locations at MLGS. While a human encroaching on the nest, for example, to read the gas chromatograph housed under the shade structure, may cause a sitting parent to temporarily leave a future nest, an occasional intrusion of this nature is not likely to harm the reproductive success of the nest. Flagging the area as was done for the current nest is helpful to alert staff to its presence, and prolonged activity under such a nest should be avoided. Alternatively, if MLGS or the CPUC require nest exclusion, AECOM or an integrated pest management specialist could provide guidance or services to achieve that outcome at a specific location; however, it would not be practicable to exclude all potential nest sites among the many complex structures at MLGS.

## Summary and Conclusion

I visited MLGS on August 6, 2025, where I monitored and removed an inactive house finch nest. Going forward, I recommend MLGS allow nests constructed during ongoing operations to progress without intervention unless they appear to conflict with required operational procedures.

Please contact me at [jon.stead@aecom.com](mailto:jon.stead@aecom.com) or (510) 874-3058 if you have any questions or concerns.

Sincerely,



Jonathan Stead  
MLGS Designated Biologist  
Senior Project Ecologist  
AECOM



**Marsh Landing Generation Station**



Trainer: Daid Frondsen  
Date: 7-14-25  
Training: Wear Video & Handbook

**WORKER ENVIRONMENTAL AWARENESS PROGRAM**

**WORKER TRAINING ATTENDANCE RECORD**

I have attended the Marsh Landing Generating Station **Project Worker Environmental Awareness Program Worker Training** and understand and agree to comply with all environmental requirements presented. I understand that I am accountable for my actions and that failure to comply with the requirements may be grounds for immediate removal from the project and/or legal action.

	<b>Signature</b>	<b>Print Name</b>	<b>Company</b>	<b>Date</b>
1.	<i>R. Cully</i>	Regina Gelman	NRG	7-14-25
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**Marsh Landing Generating Station**  
**Annual Compliance Report**

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**3.2 HAZ-1**

See the latest attached copy of the list of Hazardous Materials contained at the facility.

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>AMMONIA CONTAINMENT SLAB</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
Corrosive, Toxic	<b>AMMONIUM HYDROXIDE</b>	<b>Gallons</b>	<b>21200</b>	<b>21200</b>	12200	- Physical	Anhydrous Ammonia	19%	7664-41-7	
	CAS No 1336-21-6 Map: 2 Grid: D2	State Liquid	Storage Container Aboveground Tank	Pressue > Ambient	Waste Code	Corrosive To Metal	Water	81%	7732-1-5	
		Type Mixture	Days on Site: 365	Temperature Ambient		- Physical Hazard Not Otherwise Classified - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity				

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>BACK PULSE AIR FILTER COMPRESSORS</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>COMPRESSOR OIL</b>	<b>Gallons</b>	<b>8</b>	<b>3</b>	<b>8</b>		- Physical Hazard	Base Oil	90%	
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	Dialkyl Thiophosphate Ester	1%	268567-32-4
	Map: 2 Grid: F3-F7	<u>Liquid</u>	Other		Ambient		- Health Hazard	Alkaryl amine	2%	68411-46-1
		<u>Type</u>			<u>Temperature</u>		Not Otherwise Classified			
		<u>Mixture</u>	Days on Site: 365		Ambient					

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>BATTERY BANKS THROUGHOUT SITE (5kV BLDG, SWITCHYARD, ELEC PACKAGES, ADMIN)</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 8 - Corrosives (Liquids and Solids)	<b>LEAD ACID BATTERIES</b>	<b>Pounds</b>	<b>9503</b>	<b>58</b>	9503	- Physical	Sulfuric Acid	40%	<input checked="" type="checkbox"/> 7664-93-9	
Corrosive, Water Reactive, Class 2, Toxic, Oxidizing, Class 1	CAS No. <input checked="" type="checkbox"/> EHS Map: 2 Grid: C3-I8, K3	State Liquid	Storage Container Other		Pressure Ambient	Waste Code Explosive	Lead and Lead Compounds	55%	7439-92-1	
		Type Mixture	Days on Site: 365		Temperature Ambient	- Physical	Antimony	5%	7440-36-0	
						Corrosive To Metal				
						- Health				
						Carcinogenicity				
						- Health Acute				
						Toxicity				
						- Health				
						Reproductive				
						Toxicity				
						- Health Skin				
						Corrosion				
						Irritation				
						- Health				
						Respiratory Skin				
						Sensitization				
						- Health Serious				
						Eye Damage Eye				
						Irritation				
						- Health Specific				
						Target Organ				
						Toxicity				

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>BATTERY ENERGY STORAGE SYSTEM (BESS)</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
Combustible Liquid, Class III-B	<b>ETHYLENE GLYCOL</b>	<b>Gallons</b>	<b>430</b>	<b>16</b>	430		- Physical Hazard	Ethylene Glycol	90%	107-21-1
	CAS No	State	Storage Container	Pressue	Waste Code		Not Otherwise Classified	Water	10%	7732-18-5
	107-21-1	Liquid	Other	> Ambient			- Health Acute			
	Map: 2 Grid: E9-G9	Type		Temperature			- Health Specific			
		Mixture	Days on Site: 365		> Ambient		Toxicity			
							Target Organ			
							Toxicity			
DOT: 8 - Corrosives (Liquids and Solids)	<b>LEAD ACID BATTERIES</b>	<b>Pounds</b>	<b>80</b>	<b>8</b>	80		- Physical	Sulfuric Acid	20%	✓ 7664-93-9
Corrosive, Water Reactive, Class 2, Toxic, Oxidizing, Class 1	CAS No	State	Storage Container	Pressue	Waste Code		Flammable			
	Map: 2 Grid: G8	Liquid	Other	Ambient			- Physical			
		Type		Temperature			Explosive			
		Mixture	Days on Site: 365	Ambient			- Health			
							Carcinogenicity			
							- Health Acute			
							Toxicity			
							- Health			
							Reproductive			
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
DOT: 9 - Misc. Hazardous Materials	<b>LITHIUM-ION BATTERY CUBE</b>	<b>Pounds</b>	<b>192060</b>	<b>11640</b>	192060		- Physical	Hexafluoropropylene-Vinylidene	15%	9011-17-0
Flammable Liquid, Class I-A	CAS No	State	Storage Container	Pressue	Waste Code		Flammable			
	Map: 2 Grid: E9-G9	Solid	Other	Ambient			- Health Acute	Dimethyl Carbonate	15%	616-38-6
		Type		Temperature			Toxicity	Propylene Carbonate	15%	108-32-7
		Mixture	Days on Site: 365	Ambient			- Health Skin	Diethyl Carbonate	15%	616-38-6
							Corrosion	Ethyl Methyl Carbonate	15%	623-53-0
							Irritation			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>	<b>BATTERY ENERGY STORAGE SYSTEM (BESS)</b>	Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	<b>SOYBEAN OIL</b>	<b>Gallons</b>	<b>4160</b>	<b>832</b>	<b>4160</b>		- Physical	Soybean Oil	40%	8001-22-7
	CAS No	State	Storage Container		Pressure	Waste Code	- Health Skin	Aliphatic hydrocarbon	40%	64742-47-8
Combustible Liquid, Class III-B	8001-22-7	Liquid	Other		Ambient		Corrosion	(4R)-4-Isopropenyl-1-	15%	5989-27-5
	Map: 2 Grid: E9-G9	Type			Temperature		Irritation	methylcyclohexene		
		Mixture	Days on Site: 365		Ambient		- Health			
							Respiratory Skin Sensitization			
							- Health Serious			
							Eye Damage Eye Irritation			
							- Health			
							Aspiration Hazard			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>CEMS SHELTERS UNITS 1-4</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	<b>NITROGEN</b>	<b>Cu. Feet</b>	<b>3600</b>	<b>300</b>	3000		- Physical Gas			
	<u>CAS No</u> 7727-37-9	<u>State</u> Gas	<u>Storage Container</u> Cylinder		<u>Pressue</u> > Ambient	<u>Waste Code</u>	Under Pressure			
	Map: 2 Grid: E3-E8	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		- Physical Explosive - Health Simple Asphyxiant			
	<b>NITROGEN, NITRIC OXIDE</b>	<b>Cu. Feet</b>	<b>2100</b>	<b>150</b>	1800		- Physical Gas	NITROGEN	100%	7727-37-9
	<u>CAS No</u>	<u>State</u> Gas	<u>Storage Container</u> Cylinder		<u>Pressue</u> > Ambient	<u>Waste Code</u>	Under Pressure	NITRIC OXIDE		✓ 10102-43-9
	Map: 2 Grid: E3-E8	<u>Type</u> Mixture	Days on Site: 365		<u>Temperature</u> Ambient		- Physical Explosive - Health Simple Asphyxiant	NITROGEN OXIDES		10102-44-0
	<b>NITROGEN, NITRIC OXIDE, CARBON MONOXIDE</b>	<b>Cu. Feet</b>	<b>3800</b>	<b>250</b>	2400		- Physical Gas	NITROGEN	100%	7727-37-9
	<u>CAS No</u>	<u>State</u> Gas	<u>Storage Container</u> Cylinder		<u>Pressue</u> > Ambient	<u>Waste Code</u>	Under Pressure	NITRIC OXIDE		✓ 10102-43-9
	Map: 2 Grid: E3-E8	<u>Type</u> Mixture	Days on Site: 365		<u>Temperature</u> Ambient		- Physical Explosive - Health Simple Asphyxiant	CARBON MONOXIDE		630-08-0
								NITROGEN OXIDES		10102-44-0
	<b>NITROGEN, OXYGEN, CARBON MONOXIDE</b>	<b>Cu. Feet</b>	<b>3300</b>	<b>150</b>	3150		- Physical Gas	NITROGEN	89%	7727-37-9
	<u>CAS No</u>	<u>State</u> Gas	<u>Storage Container</u> Cylinder		<u>Pressue</u> > Ambient	<u>Waste Code</u>	Under Pressure	OXYGEN	10%	7782-44-7
	Map: 2 Grid: E3-8	<u>Type</u> Mixture	Days on Site: 365		<u>Temperature</u> Ambient		- Physical Explosive - Health Reproductive Toxicity - Health Simple Asphyxiant	CARBON MONOXIDE	0%	630-08-0



## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>COMPRESSOR BUILDING</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.1 - Flammable Gases	<b>ACETYLENE</b>	<b>Cu. Feet</b>	<b>764</b>	<b>382</b>	764		- Physical			
Unstable (Reactive), Class 2, Flammable Gas	CAS No 74-86-2 Map: 2 Grid: B6-C6	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	Flammable - Physical Gas Under Pressure - Physical Explosive - Health Simple Asphyxiant			
DOT: 2.2 - Nonflammable Gases	<b>OXYGEN</b>	<b>Cu. Feet</b>	<b>843</b>	<b>281</b>	562		- Physical Gas Under Pressure			
Oxidizing, Class 2	CAS No 7782-44-7 Map: 2 Grid: B6-C6	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Oxidizer  - Health Hazard Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>CONTROL OIL RESERVOIRS</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>LUBE OIL</b>	<b>Gallons</b>	<b>420</b>	<b>140</b>	420		- Physical Hazard			
	<u>CAS No</u> 8012-95-1	<u>State</u> Liquid	<u>Storage Container</u> Other		<u>Pressue</u> Ambient	<u>Waste Code</u>	Not Otherwise Classified			
	Map: 2 Grid: F3-F7	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		- Health Hazard Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>DAIS UNIT AIR COMPRESSORS</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>COMPRESSOR OIL</b>	<b>Gallons</b>	<b>100</b>	<b>30</b>	<b>80</b>		- Physical Hazard	Base Oil	90%	
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	Dialkyl Thiophosphate Ester	1%	268567-32-4
	Map: 2 Grid: F4-F8	<u>Liquid</u>	Other		Ambient		- Health Hazard	Alkaryl amine	2%	68411-46-1
		<u>Type</u>			<u>Temperature</u>		Not Otherwise Classified			
		<u>Mixture</u>	Days on Site: 365		Ambient					
	<b>ULTRA COOLANT</b>	<b>Gallons</b>	<b>60</b>	<b>15</b>	<b>60</b>		- Physical Hazard	Polypropylene glycol	65%	
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	Pentaerythritol ester	27%	
	Map: 2 Grid: F4-F8	<u>Liquid</u>	Other		Ambient		- Health Hazard	Alkylated diphenylamine	5%	68411-46-1
		<u>Type</u>			<u>Temperature</u>		Not Otherwise Classified	Barium dinonyl-naphthalene sulfonate	0%	25619-56-1
		<u>Mixture</u>	Days on Site: 365		Ambient					

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>EMERGENCY GENERATOR</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	<b>DIESEL FUEL NO. 2</b>	<b>Gallons</b>	<b>1100</b>	<b>1100</b>	<b>800</b>		- Physical Flammable	DIESEL FUEL NO. 2	98%	68476-34-6
Combustible Liquid, Class II	CAS No 68476-34-6 Map: 2 Grid: G6	State Liquid Type Mixture	Storage Container Aboveground Tank Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Carcinogenicity - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Specific Target Organ Toxicity - Health Aspiration Hazard	RENEWABLE DIESEL FATTY ACID METHYL ESTERS NAPHTHALENE	10% 3% 0%	91-20-3
DOT: 8 - Corrosives (Liquids and Solids)	<b>LEAD ACID BATTERIES</b>	<b>Pounds</b>	<b>48</b>	<b>24</b>	<b>48</b>		- Physical Flammable	Sulfuric Acid	40%	✓ 7664-93-9
Corrosive, Water Reactive, Class 2, Toxic, Oxidizing, Class 1	CAS No Map: 2 Grid: G6	State Liquid Type Mixture	Storage Container Other Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Physical Explosive - Physical Corrosive To Metal - Health Carcinogenicity - Health Acute Toxicity - Health Reproductive Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>FIRE PUMP BUILDING</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	<b>DIESEL FUEL NO. 2</b>	<b>Gallons</b>	<b>359</b>	<b>359</b>	<b>280</b>		- Physical Flammable	DIESEL FUEL NO. 2	98%	68476-34-6
Combustible Liquid, Class II	CAS No 68476-34-6 Map: 2 Grid: C2	State Liquid Type Mixture	Storage Container Tank Inside Building Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Carcinogenicity - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Specific Target Organ Toxicity - Health Aspiration Hazard	RENEWABLE DIESEL FATTY ACID METHYL ESTERS NAPHTHALENE	10% 3% 0%	91-20-3
DOT: 8 - Corrosives (Liquids and Solids)	<b>LEAD ACID BATTERIES</b>	<b>Pounds</b>	<b>100</b>	<b>50</b>	<b>100</b>		- Physical Flammable	Sulfuric Acid	40%	✓ 7664-93-9
Corrosive, Water Reactive, Class 2, Toxic, Oxidizing, Class 1	CAS No Map: 2 Grid: C2	State Liquid Type Mixture	Storage Container Other Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Physical Explosive - Physical Corrosive To Metal - Health Carcinogenicity - Health Acute Toxicity - Health Reproductive Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>FUEL GAS CHROMATOGRAPH</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	<b>COMPRESSED AIR ZERO</b>	<b>Cu. Feet</b>	<b>600</b>	<b>300</b>	300		- Physical Gas Under Pressure			
	CAS No 132259-10-0 Map: 2 Grid: C6	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Health Hazard Not Otherwise Classified			
DOT: 2.2 - Nonflammable Gases	<b>HELIUM</b>	<b>Cu. Feet</b>	<b>600</b>	<b>300</b>	600		- Physical Gas Under Pressure			
	CAS No 7440-59-7 Map: 2 Grid: C6	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Explosive - Health Simple Asphyxiant			
DOT: 2.1 - Flammable Gases Flammable Gas	<b>HYDROGEN</b>	<b>Cu. Feet</b>	<b>600</b>	<b>300</b>	300		- Physical Flammable Under Pressure			
	CAS No 1333-74-0 Map: 2 Grid: C6	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Explosive - Health Simple Asphyxiant			
DOT: 2.1 - Flammable Gases Flammable Gas	<b>METHANE MIXTURE CHROMATOGRAPH CAL GAS</b>	<b>Cu. Feet</b>	<b>500</b>	<b>250</b>	250		- Physical Flammable Under Pressure	ETHANE METHANE PROPANE NITROGEN	100% 100% 100% 10%	74-84-0 74-82-8 74-98-6 7727-37-9
	CAS No Map: 2 Grid: C6	State Gas Type Mixture	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Explosive - Health Simple Asphyxiant			
DOT: 2.2 - Nonflammable Gases	<b>NITROGEN</b>	<b>Cu. Feet</b>	<b>600</b>	<b>300</b>	300		- Physical Gas Under Pressure			
	CAS No 7727-37-9 Map: 2 Grid: C6	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Explosive - Health Simple Asphyxiant			

## Hazardous Materials And Wastes Inventory Matrix Report

CAS No

CERS Business/Org. **Marsh Landing Generating Station**  
 Facility Name **Marsh Landing Generating Station**  
 3201C Wilbur Ave, Antioch 94509

Chemical Location  
**FUEL GAS COMPRESSORS**

CERS ID **10480876**  
 Facility ID **07-000-774528**  
 Status **Draft**

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>LUBE OIL</b>	<b>Gallons</b>	<b>315</b>	<b>105</b>	<b>315</b>		- Physical Hazard			
	<u>CAS No</u> 8012-95-1	<u>State</u> Liquid	<u>Storage Container</u> Aboveground Tank		<u>Pressue</u> Ambient	<u>Waste Code</u>	Not Otherwise Classified			
	Map: 2 Grid: B6-C6	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		- Health Hazard Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>FUEL GAS CONDITIONING SKID AND FILTER/SEPARATOR</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	<b>DIESEL FUEL NO. 2</b>	<b>Gallons</b>	<b>78</b>	<b>78</b>	<b>60</b>		- Physical - Flammable	DIESEL FUEL NO. 2	98%	68476-34-6
Combustible Liquid, Class II	CAS No 68476-34-6 Map: 2 Grid: C6	State Liquid Type Mixture	Storage Container Tank Wagon Days on Site: 180		Pressue Ambient Temperature Ambient	Waste Code	- Health - Carcinogenicity - Health Acute - Toxicity - Health Skin - Corrosion - Irritation - Health - Respiratory Skin - Sensitization - Health Specific - Target Organ - Toxicity - Health - Aspiration Hazard	RENEWABLE DIESEL FATTY ACID METHYL ESTERS NAPHTHALENE	10% 3% 0%	91-20-3
	<b>NATURAL GAS CONDENSATE</b>	<b>Gallons</b>	<b>561</b>	<b>211</b>	<b>5</b>		- Physical - Flammable - Health - Carcinogenicity - Health Acute - Toxicity - Health Specific - Target Organ - Toxicity - Health - Aspiration Hazard - Health Germ - Cell Mutagenicity	Propane Ethane n-Pentane n-Hexane Heptane	50% 30% 15% 8% 6%	74-98-6 74-84-0 109-66-0 110-54-3 142-82-5
	CAS No Map: 2 Grid: C6	State Liquid Type Mixture	Storage Container Aboveground Tank Days on Site: 365		Pressue Ambient Temperature Ambient	Waste Code				



### Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>FUEL GAS DEW POINT HEATERS</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>PROPYLENE GLYCOL 30%</b>	<b>Gallons</b>	<b>18932</b>	<b>9466</b>	18932		- Physical Hazard	PROPYLENE GLYCOL	96%	57-55-6
	CAS No 57-55-6	State	Storage Container		Pressue	Waste Code	Not Otherwise Classified	WATER	4%	7732-18-5
	Map: 2 Grid: C5-D5	Type	Aboveground Tank		Temperature		- Health Hazard			
		Mixture	Days on Site: 365		> Ambient		Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>GENERATOR AIR COMPRESSOR, SHOP COMPRESSOR</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>COMPRESSOR OIL</b>	<b>Gallons</b>	<b>5</b>	<b>2</b>	<b>5</b>		- Physical Hazard	Base Oil	90%	
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	Dialkyl Thiophosphate Ester	1%	268567-32-4
	Map: 2 Grid: F3-F7, C3	<u>Liquid</u>	Other		Ambient		- Health Hazard	Alkaryl amine	2%	68411-46-1
		<u>Type</u>			<u>Temperature</u>		Not Otherwise Classified			
		<u>Mixture</u>	Days on Site: 365		Ambient					

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>HAZARDOUS MATERIALS STORAGE</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>LUBRICATING AND HYDRAULIC OILS</b>	<b>Gallons</b>	<b>520</b>	<b>55</b>	<b>410</b>		- Physical Hazard Not Otherwise Classified			
	<u>CAS No</u> 8012-95-1 Map: 2 Grid: H12	<u>State</u> <u>Liquid</u> <u>Type</u> Pure	<u>Storage Container</u> Steel Drum, Plastic Bottle or Jug		<u>Pressue</u> Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>	- Health Hazard Not Otherwise Classified			
	<b>Turbine Blade Wash Soap</b>	<b>Gallons</b>	<b>60</b>	<b>55</b>	<b>60</b>		- Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Aspiration Hazard	Isotridecylalcohol, Ethoxylated 3-Butoxypropan-2-ol Oleoyl Sarcosinic Acid Ethynol, 2, 2, '-[[[(Methyl-1H-Benzotriazol-1...]]]	20% 3% 3% 1%	69011-36-5 5131-66-8 110-25-8 80584-88-9
	<u>CAS No</u>  Map: 2 Grid: H12	<u>State</u> <u>Liquid</u> <u>Type</u> Mixture	<u>Storage Container</u> Plastic/Non-metalic Drum, Plastic Bottle or Jug, Other		<u>Pressue</u> Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>HAZARDOUS WASTE CENTRAL ACCUMULATION AREA (CAA)</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>OILY RAGS AND SPILL DEBRIS</b>	<b>Pounds</b>	<b>1000</b>	<b>500</b>	250	1900	- Physical	Lubricating Oils, used/waste	30%	70514-12-4
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Flammable	Water/Solids/Cloth	70%	7732-18-5
	Map: 2 Grid: B3	<u>Solid</u>	Steel Drum, Box		<u>Ambient</u>	352	- Physical			
		<u>Type</u>			<u>Temperature</u>		Self Heating			
		<u>Waste</u>	Days on Site: 365		<u>Ambient</u>		- Health			
							Carcinogenicity			
							- Health			
							Reproductive			
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health Germ			
							Cell Mutagenicity			
	<b>USED OIL</b>	<b>Gallons</b>	<b>110</b>	<b>55</b>	30	1000	- Physical Hazard	Lubricating Oils, used	90%	70514-12-4
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Not Otherwise	Water/Solids	10%	7732-18-5
	Map: 2 Grid: B3	<u>Liquid</u>	Steel Drum		<u>Ambient</u>	221	Classified			
		<u>Type</u>			<u>Temperature</u>		- Health			
		<u>Waste</u>	Days on Site: 365		<u>Ambient</u>		Carcinogenicity			
							- Health			
							Reproductive			
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health			
							Aspiration Hazard			
							- Health Germ			
							Cell Mutagenicity			

### Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>MACHINE SHOP</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	<b>DIESEL FUEL NO. 2</b>	<b>Gallons</b>	<b>10</b>	<b>5</b>	<b>10</b>		- Physical Flammable	DIESEL FUEL NO. 2	98%	68476-34-6
Combustible Liquid, Class II	CAS No 68476-34-6 Map: 2 Grid: B3-C4	State Liquid Type Mixture	Storage Container Other Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Carcinogenicity - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Specific Target Organ Toxicity - Health Aspiration Hazard	RENEWABLE DIESEL FATTY ACID METHYL ESTERS NAPHTHALENE	10% 3% 0%	91-20-3
DOT: 3 - Flammable and Combustible Liquids	<b>GASOLINE (Unleaded)</b>	<b>Gallons</b>	<b>10</b>	<b>5</b>	<b>5</b>		- Physical Flammable	GASOLINE	100%	86290-81-5
Flammable Liquid, Class I-B	CAS No 86290-81-5 Map: 2 Grid: B3-C4	State Liquid Type Mixture	Storage Container Other Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Carcinogenicity - Health Reproductive Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity - Health Aspiration Hazard - Health Germ Cell Mutagenicity	TOLUENE XYLENE PENTANE BUTANE	20% 8% 7% 6%	108-88-3 1330-20-7 540-84-1 106-97-8
	<b>LUBRICATING AND HYDRAULIC OILS</b>	<b>Gallons</b>	<b>40</b>	<b>5</b>	<b>25</b>		- Physical Hazard Not Otherwise Classified			
	CAS No 8012-95-1 Map: 2 Grid: B3-C4	State Liquid Type Pure	Storage Container Plastic Bottle or Jug, Other Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Hazard Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>MAIN AIR COMPRESSORS</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>COMPRESSOR OIL</b>	<b>Gallons</b>	<b>14</b>	<b>5</b>	<b>12</b>		- Physical Hazard	Base Oil	90%	
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	Dialkyl Thiophosphate Ester	1%	268567-32-4
	Map: 2 Grid: C6	<u>Liquid</u>	Other		Ambient		- Health Hazard	Alkaryl amine	2%	68411-46-1
		<u>Type</u>			<u>Temperature</u>		Not Otherwise Classified			
		<u>Mixture</u>	Days on Site: 365		Ambient					

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>NORTH &amp; EAST OUTSIDE CORNER OF WAREHOUSE</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	<b>HELIUM</b>	<b>Cu. Feet</b>	<b>900</b>	<b>300</b>	600		- Physical Gas			
	CAS No 7440-59-7 Map: 2 Grid: H12	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	Under Pressure - Physical Explosive - Health Simple Asphyxiant			
DOT: 2.1 - Flammable Gases	<b>HYDROGEN</b>	<b>Cu. Feet</b>	<b>1500</b>	<b>300</b>	900		- Physical Flammable			
Flammable Gas	CAS No 1333-74-0 Map: 2 Grid: H12	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Physical Explosive - Health Simple Asphyxiant			
DOT: 2.1 - Flammable Gases	<b>METHANE MIXTURE CHROMATOGRAPH CAL GAS</b>	<b>Cu. Feet</b>	<b>500</b>	<b>250</b>	250		- Physical Flammable	ETHANE	100%	74-84-0
Flammable Gas	CAS No Map: 2 Grid: H12	State Gas Type Mixture	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Physical Explosive - Health Simple Asphyxiant	METHANE PROPANE NITROGEN	100% 100% 10%	74-82-8 74-98-6 7727-37-9
DOT: 2.2 - Nonflammable Gases	<b>NITROGEN</b>	<b>Cu. Feet</b>	<b>22800</b>	<b>500</b>	12000		- Physical Gas Under Pressure			
	CAS No 7727-37-9 Map: 2 Grid: H12	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Explosive - Health Simple Asphyxiant			
	<b>NITROGEN, NITRIC OXIDE</b>	<b>Cu. Feet</b>	<b>2400</b>	<b>150</b>	1200		- Physical Gas Under Pressure	NITROGEN	100%	7727-37-9
	CAS No Map: 2 Grid: H12	State Gas Type Mixture	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	Under Pressure - Physical Explosive - Health Simple Asphyxiant	NITRIC OXIDE NITROGEN OXIDES		✓ 10102-43-9 10102-44-7
	<b>NITROGEN, NITRIC OXIDE, CARBON MONOXIDE</b>	<b>Cu. Feet</b>	<b>3750</b>	<b>250</b>	1500		- Physical Gas Under Pressure	NITROGEN	100%	7727-37-9
	CAS No Map: 2 Grid: H12	State Gas Type Mixture	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	Under Pressure - Physical Explosive - Health Simple Asphyxiant	NITRIC OXIDE CARBON MONOXIDE NITROGEN OXIDES		✓ 10102-43-9 630-08-0 10102-44-0

### Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>NORTH &amp; EAST OUTSIDE CORNER OF WAREHOUSE</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>NITROGEN, OXYGEN, CARBON MONOXIDE</b>	<b>Cu. Feet</b>	<b>3300</b>	<b>150</b>	2250		- Physical Gas	NITROGEN	89%	7727-37-9
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Under Pressure	OXYGEN	10%	7782-44-7
		<u>Gas</u>	Cylinder		> Ambient		- Physical	CARBON MONOXIDE	0%	630-08-0
		<u>Type</u>			<u>Temperature</u>		Explosive			
	Map: 2 Grid: H12	<u>Mixture</u>	Days on Site: 365		Ambient		- Health			
							Reproductive			
							Toxicity			
							- Health Simple			
							Asphyxiant			
DOT: 2.2 - Nonflammable Gases	<b>ULTRA ZERO COMPRESSED AIR</b>	<b>Cu. Feet</b>	<b>1200</b>	<b>300</b>	600		- Physical Gas			
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Under Pressure			
		<u>Gas</u>	Cylinder		> Ambient		- Physical			
	Map: 2 Grid: H12	<u>Type</u>			<u>Temperature</u>		Explosive			
		<u>Pure</u>	Days on Site: 365		Ambient		- Health Hazard			
							Not Otherwise Classified			



## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>OIL WATER SEPARATORS NEAR U1 SWITCHYARD &amp; NORTH OF UNITS 2&amp;3</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>OILY WATER</b>	<b>Gallons</b>	<b>3000</b>	<b>2000</b>	3000		- Physical	Lubricating Oils	50%	70514-12-4
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Flammable	Water	50%	7732-18-5
	Map: 2 Grid: D5-D6, H4	<u>Liquid</u>	Other		Ambient		- Physical Hazard			
		<u>Type</u>			<u>Temperature</u>		Not Otherwise Classified			
		Mixture	Days on Site: 365		Ambient		- Health			
							- Health			
							Carcinogenicity			
							- Health			
							Reproductive			
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health			
							Aspiration Hazard			
							- Health Germ			
							Cell Mutagenicity			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>PORTABLE TANKS AT COVERED PARKING LOT AND TURBINES (as needed)</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
Corrosive	<b>CLEANBLADE GTC 1000</b>	<b>Gallons</b>	<b>575</b>	<b>400</b>	50		- Physical Hazard	FATTY ALCOLHOL ALKOXYLATE	15%	69227-21-0
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	PROPYLENE GLYCOL N-BUTYL ETHER	5%	5131-66-8
	<u>Map: 2 Grid: C12-D13, F3-F8</u>	<u>Liquid</u>	Tank Wagon		<u>Ambient</u>		- Health	SEBACIC ACID	2%	70103-35-4
		<u>Type</u>			<u>Temperature</u>		Carcinogenicity	DIETHANOLAMINE	1%	111-42-2
		<u>Mixture</u>	Days on Site: 365		<u>Ambient</u>		- Health Reproductive Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>REFUELING TRUCK</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	<b>DIESEL FUEL NO. 2</b>	<b>Gallons</b>	<b>50</b>	<b>50</b>	25		- Physical	DIESEL FUEL NO. 2	98%	68476-34-6
	CAS No 68476-34-6	State Liquid	Storage Container Other		Pressue Ambient	Waste Code	- Health	RENEWABLE DIESEL	10%	
Combustible Liquid, Class II	Map: 2 Grid: C12-D13	Type Mixture	Days on Site: 365		Temperature Ambient		- Health Acute	FATTY ACID METHYL ESTERS	3%	91-20-3
							- Health Skin	NAPHTHALENE	0%	
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health			
							Aspiration Hazard			
DOT: 3 - Flammable and Combustible Liquids	<b>GASOLINE (Unleaded)</b>	<b>Gallons</b>	<b>50</b>	<b>50</b>	25		- Physical	GASOLINE	100%	86290-81-5
	CAS No	State Liquid	Storage Container Other		Pressue Ambient	Waste Code	- Health	TOLUENE	20%	108-88-3
Flammable Liquid, Class I-B	Map: 2 Grid: C12-D13	Type Mixture	Days on Site: 365		Temperature Ambient		Carcinogenicity	XYLENE	8%	1330-20-7
							- Health	PENTANE	7%	540-84-1
							Reproductive	BUTANE	6%	106-97-8
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health			
							Aspiration Hazard			
							- Health Germ			
							Cell Mutagenicity			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>SPARE TRANSFORMER NORTH OF WAREHOUSE</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	<b>NITROGEN</b>	<b>Cu. Feet</b>	<b>300</b>	<b>150</b>	150		- Physical Gas Under Pressure			
	<u>CAS No</u> 7727-37-9	<u>State</u> Gas	<u>Storage Container</u> Cylinder		<u>Pressue</u> > Ambient	<u>Waste Code</u>	- Physical Explosive			
	Map: 2 Grid: G11	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		- Health Simple Asphyxiant			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>SWITCHYARD</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>HYDRAULIC OIL</b>	<b>Gallons</b>	<b>90</b>	<b>15</b>	<b>90</b>		- Physical Hazard	Gas Oils	85%	64742-79-6
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	Butylated hydroxytoluene	0%	128-37-0
	Map: 2 Grid: G3-H8	<u>Liquid</u>	Aboveground Tank		<u>Ambient</u>		- Health Acute			
		<u>Type</u>	Mixture	Days on Site: 365	<u>Temperature</u>		- Health Skin			
		<u>Mixture</u>			<u>Ambient</u>		Corrosion			
							Irritation			
							- Health			
							Aspiration Hazard			
DOT: 2.2 - Nonflammable Gases	<b>SULFUR HEXAFLUORIDE</b>	<b>Cu. Feet</b>	<b>3015</b>	<b>503</b>	<b>3015</b>		- Physical Gas			
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Under Pressure			
	2551-62-4	<u>Gas</u>	Other		<u>&gt; Ambient</u>		- Physical			
	Map: 2 Grid: G3-H8	<u>Type</u>			<u>Temperature</u>		Explosive			
		<u>Pure</u>		Days on Site: 365	<u>Ambient</u>		- Health Simple			
							Asphyxiant			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>TA FANS</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>LUBE OIL</b>	<b>Gallons</b>	<b>864</b>	<b>108</b>	<b>680</b>		- Physical Hazard			
	<u>CAS No</u> 8012-95-1	<u>State</u> Liquid	<u>Storage Container</u> Other		<u>Pressue</u> Ambient	<u>Waste Code</u>	Not Otherwise Classified			
	Map: 2 Grid: E3-F7	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		- Health Hazard Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>Transformers Throughout (GSU, AUX, and SPARE)</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>MINERAL OIL, HYTRANS 61</b>	<b>Gallons</b>	<b>87893</b>	<b>15224</b>	87893		- Physical Hazard	DISTILLATES, PETROLEUM	99%	64742-53-6
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	2, 6-DI-BUTYL-P-CRESOL (BHT)	1%	128-37-0
	Map: 2 Grid: G3-G8, G11	<u>Liquid</u>	Other		<u>Ambient</u>		- Health			
		<u>Type</u>			<u>Temperature</u>		Respiratory Skin Sensitization			
		<u>Mixture</u>	Days on Site: 365		<u>Ambient</u>		- Health Serious			
							Eye Damage Eye Irritation			
							- Health			
							Aspiration Hazard			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>TURBINES</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>LUBE OIL</b>	<b>Gallons</b>	<b>26000</b>	<b>7244</b>	24200		- Physical Hazard			
	CAS No 64742-54-7	State Liquid	Storage Container Other		Pressue Ambient	Waste Code	Not Otherwise Classified			
	Map: 2 Grid: F4-F8	Type Pure	Days on Site: 365		Temperature Ambient		- Health Hazard Not Otherwise Classified			



## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>TURBINES AND ELECTRICAL PACKAGES</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>FM 200 FIRE SUPPRESSION</b>	<b>Pounds</b>	<b>5472</b>	<b>576</b>	5472		- Physical Gas Under Pressure	1,1,1,2,3,3,3- HEPTAFLUROPROPANE	100%	431-89-0
	CAS No 431-89-0 Map: 2 Grid: F3-F8	State Gas Type Pure	Storage Container Cylinder Days on Site: 365		Pressue > Ambient Temperature Ambient	Waste Code	- Physical Explosive - Health Simple Asphyxiant	NITROGEN		7727-37-9

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>TURNING GEAR LUBE OIL</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>LUBE OIL</b>	<b>Gallons</b>	<b>76</b>	<b>19</b>	<b>76</b>		- Physical Hazard			
	<u>CAS No</u> 8012-95-1	<u>State</u> Liquid	<u>Storage Container</u> Other		<u>Pressue</u> Ambient	<u>Waste Code</u>	Not Otherwise Classified			
	Map: 2 Grid: G3-G8	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		- Health Hazard Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>Various Air Receivers</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	<b>AIR</b>	<b>Cu. Feet</b>	<b>3753</b>	<b>2115</b>	2369		- Physical Gas			
	CAS No	State	Storage Container		Pressue	Waste Code	Under Pressure			
	132259-10-0	Gas	Aboveground Tank		> Ambient		- Health Hazard			
	Map: 2 Grid: C3-G8	Type			Temperature		Not Otherwise Classified			
		Pure	Days on Site: 365		Ambient					

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>WAREHOUSE</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b>		Facility ID <b>07-000-774528</b>
3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 8 - Corrosives (Liquids and Solids)	<b>LEAD ACID BATTERIES</b>	<b>Pounds</b>	<b>300</b>	<b>300</b>	<b>300</b>		- Physical	Sulfuric Acid	40%	✓ 7664-93-9
Corrosive, Water Reactive, Class 2, Toxic, Oxidizing, Class 1	CAS No. <input checked="" type="checkbox"/> EHS Map: 2 Grid: H11	State Liquid	Storage Container Other		Pressure Ambient	Waste Code	- Flammable - Physical Explosive - Physical Corrosive To Metal - Health Carcinogenicity - Health Acute Toxicity - Health Reproductive Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity			
		Type Mixture	Days on Site: 365		Temperature Ambient					

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. <b>Marsh Landing Generating Station</b>	Chemical Location <b>WAREHOUSE FLAMMABLE CABINETS</b>	CERS ID <b>10480876</b>
Facility Name <b>Marsh Landing Generating Station</b> 3201C Wilbur Ave, Antioch 94509		Facility ID <b>07-000-774528</b>
		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	<b>DIESEL FUEL NO. 2</b>	<b>Gallons</b>	<b>15</b>	<b>5</b>	<b>10</b>		- Physical Flammable	DIESEL FUEL NO. 2	100%	68476-34-6
Combustible Liquid, Class II	CAS No 68476-34-6 Map: 2 Grid: H12	State Liquid Type Mixture	Storage Container Other Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Carcinogenicity - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Specific Target Organ Toxicity - Health Aspiration Hazard	RENEWABLE DIESEL FATTY ACID METHYL ESTERS NAPHTHALENE	10% 3% 0%	91-20-3
DOT: 3 - Flammable and Combustible Liquids	<b>GASOLINE (Unleaded)</b>	<b>Gallons</b>	<b>20</b>	<b>5</b>	<b>20</b>		- Physical Flammable	GASOLINE	100%	86290-81-5
Flammable Liquid, Class I-B	CAS No Map: 2 Grid: H12	State Liquid Type Mixture	Storage Container Other Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Carcinogenicity - Health Reproductive Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity - Health Aspiration Hazard - Health Germ Cell Mutagenicity	TOLUENE XYLENE PENTANE BUTANE	20% 8% 7% 6%	108-88-3 1330-20-7 540-84-1 106-97-8
	<b>ULTRA COOLANT</b>	<b>Gallons</b>	<b>16</b>	<b>5.3</b>	<b>11</b>		- Physical Hazard Not Otherwise Classified	Polypropylene glycol Pentaerythritol ester Alkylated diphenylamine Barium dinonyl-naphthalene sulfonate	65% 27% 5% 0%	68411-46-1 25619-56-1
	CAS No Map: 2 Grid: H12	State Liquid Type Mixture	Storage Container Plastic Bottle or Jug Days on Site: 365		Pressure Ambient Temperature Ambient	Waste Code	- Health Hazard Not Otherwise Classified			

## Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	<b>Marsh Landing Generating Station</b>	Chemical Location	CERS ID <b>10480876</b>
Facility Name	<b>Marsh Landing Generating Station</b>	<b>WATER TREATMENT BUILDING</b>	Facility ID <b>07-000-774528</b>
	3201C Wilbur Ave, Antioch 94509		Status <b>Draft</b>

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	<b>RO-505</b>	<b>Gallons</b>	<b>350</b>	<b>350</b>	190		- Physical Hazard	2-Propenoic acid, homopolymer	14%	9003-01-4
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	Polyoxalkylenes, C4-6, propoxylated	20%	68918-96-7
	Map: 2 Grid: B4-C5	<u>Liquid</u>	Tote Bin		<u>Ambient</u>		- Health Acute Toxicity	2 Propenoic acid, telomer	8%	97953-25-8
		<u>Type</u>	Mixture	Days on Site: 365	<u>Temperature</u>		- Health Skin Corrosion Irritation			
					<u>Ambient</u>		- Health Serious Eye Damage Eye Irritation			
							- Health Aspiration Hazard			
DOT: 8 - Corrosives (Liquids and Solids)	<b>SODIUM BISULFITE 35% - 40%, BWT-104</b>	<b>Gallons</b>	<b>350</b>	<b>350</b>	200		- Physical Hazard	SODIUM BISULFITE	40%	7631-90-5
Corrosive, Highly Toxic	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified			
	7631-90-5	<u>Liquid</u>	Tote Bin		<u>Ambient</u>		- Health Acute Toxicity			
	Map: 2 Grid: B4-C5	<u>Type</u>	Mixture	Days on Site: 365	<u>Temperature</u>		- Health Skin Corrosion Irritation			
					<u>Ambient</u>		- Health Serious Eye Damage Eye Irritation			
	<b>SODIUM HYPOCHLORITE 12.5%</b>	<b>Gallons</b>	<b>325</b>	<b>325</b>	100		- Physical Hazard	SODIUM HYPOCHLORITE	13%	7681-52-9
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Not Otherwise Classified	SODIUM HYDROXIDE	5%	1310-73-2
	Map: 2 Grid: B4-C5	<u>Liquid</u>	Tote Bin		<u>Ambient</u>		- Health Skin Corrosion Irritation			
		<u>Type</u>	Mixture	Days on Site: 365	<u>Temperature</u>		- Health Serious Eye Damage Eye Irritation			
					<u>Ambient</u>					

## **Marsh Landing Generating Station**

### **Annual Compliance Report**

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#### **3.3 HAZ-8**

The site-specific security plan has been reviewed and is available on site for viewing.

- All current project employees and appropriate contractor background investigations have been performed, and a certification statement has been appended to the operations security plan.
- The operation security plan includes hazardous material transport vendor certifications for security plans and an employee background investigations certification statement.

**Marsh Landing Generating Station**  
**Annual Compliance Report**

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**3.4 SOIL & WATER-5**

- See attached Quarterly Industrial User Compliance Reports to Delta Diablo (sanitation district)





**Industrial User Report Checklist And Certification Statement Form**

Attn: Environmental Compliance Specialist	Miracle Odurukwe		
Environmental Specialist Phone	(925) 756-1929	Fax	(925) 756-1961
Industrial User Facility Name	Marsh Landing LLC		
Duly Authorized Representative Name	Joe Moura		
Duly Authorized Representative Phone	925-779-6685		

This Industrial User Report Checklist and Certification Statement Form shall be submitted with all Self-Monitoring Reports (SMRs), as specified by the Wastewater Discharge Permit issued by Delta Diablo, hereinafter referred to as the District. When submitting Self-Monitoring Reports, check all that are applicable.

RECEIVED

APR 10 2025

**Self-Monitoring Reports (SMRs) (Required)**

DELTA DIABLO

Flow Discharge Summary (Review Discharge Permit.)

Calibration of Effluent Flow Meters; if applicable.

**Monitoring Results – all required tests completed, results reviewed, results included**  
Quality Assurance/Quality Control (QA/QC) and Chain-of-Custody (COC) (Review Discharge Permit):

**pH (field-grab) (shall be analyzed within 15 minutes of sample collection).**  
Results, collection time, analysis time and Technician’s Initials shall be reported in the comments section of the respective COC. The pH meter shall be accurate and reproducible to 0.1 pH unit with a range of 0 to 14 and equipped with a temperature–compensation adjustment (Standard methods).

Cyanide samples were tested for oxidizers and preserved with Sodium Hydroxide (NaOH).  
This shall be reported in the comments section on the respective COC, if applicable.

Selenium lab analysis by EPA Method 200.8 by Reaction Mode: if applicable.

Total Phenolics lab analysis by EPA Method 420.4: if applicable.

All sample analysis for regulatory compliance reporting shall be completed by an ELAP certified Laboratory.

Certification Statement included (see attached)

Other requested data \_\_\_\_\_



## Industrial User Report Checklist And Certification Statement Form

### Violations (if applicable)

- All wastewater discharge violations are reported during this period:
- The District was contacted within 24- hours of becoming aware of the violation.  
Date: \_\_\_\_\_
- A follow-up resample was completed. Date: \_\_\_\_\_
- Corrective actions implemented to resolve violation (Please explain in writing)
- Significant Non-Compliance (SNC) Status Review  
Please circle the review period \*: **January – June** and **July -December**.

The SIU shall conduct a SNC review for the previous completed period \* prior to the Self-monitoring Report (SMR) due date. Examples: A October SMR due date, the SNC review period is **January – June** or an April SMR due date, the SNC review period is **July – December**.

The SNC definition can be found in 40 CFR 403.8.

- a) Chronic SNC= >66% of a regulated parameter in violation during six-month Period \*.
- b) Technical Review Criteria (TRC) SNC = >33% of a regulated pollutant during a six-month period\* equals or exceeds the product of the daily maximum limit or the average limit multiplied by the applicable TRC factor (1.4 for BOD, TSS and Oil/Grease and 1.2 for all other regulated pollutants except pH).

Is the SIU in SNC (as defined in a and/or b) for this period\*? Yes , No ; If yes, for what period? \_\_\_\_\_ . Please report the SNC status to the District in the SMR and include corrective actions to resolve the SNC classification.

Other violations – i.e., reporting, spills to sewer, or prohibited discharges

**All violations will be discussed in the cover letter of the Self-Monitoring Report.**

Significant Changes

Anticipated changes that may alter the nature, quality, or volume of the wastewater discharged. Planned changes shall be submitted at least 90 days prior to implementation, and shall include a detailed description of this change.




## Industrial User Report Checklist And Certification Statement Form

### Certification Statement

Industrial User Facility Name	Marsh Landing LLC
Industrial User Facility Address	3201-C Wilbur Avenue, Antioch, CA 94509
Duly Authorized Representative Phone	925-779-6685
Indicate Period Covered by This Report	January 1-March 31, 2025

#### Certification Statement:

**I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 403.6).**

Duly Authorized Representative Signature	
Duly Authorized Representative Print	Joe Moura
Date	4/10/2025



**Marsh Landing LLC**  
Marsh Landing Generating Station  
3201-C Wilbur Avenue (shipping)  
PO Box 1687 (mailing)  
Antioch, CA 94509

April 10, 2025

Mr. Miracle Odurukwe  
Delta Diablo  
2500 Pittsburg-Antioch Highway  
Antioch, CA 94509-1373

**Subject: 2025 First Quarterly (January 1-March 31) Self-Monitoring Report  
Marsh Landing LLC, Marsh Landing Generating Station,  
Industrial Wastewater Discharge Permit 0311963-S**

This letter documents the transmittal of the 2025 First Quarterly Self-Monitoring Report (SMR).

Compliance Statement (choose one):

- There were no violations of waste discharge requirements during the reporting period.
- The following violation(s) of waste discharge requirements occurred during the reporting period, as described below:

**Discussion:**

This report is the SMR filed for the station and covers the period from January 1 through March 31, 2025. This report includes monthly flow data, and quarterly and semiannual analytical data required to be collected in 2025. Data are summarized in the attached tables.

Additionally, enclosed is documentation of the flow meter calibrations performed in February 2025 for compliance with the Annual Flow Measurement Device Calibration requirement in the Industrial Wastewater Discharge Permit.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

If you have any questions, please contact Mr. David Frandsen, Environmental Specialist at [david.frandsen@nrg.com](mailto:david.frandsen@nrg.com) or call 925.779.6695

Sincerely,



**Joe Moura**

Plant Manager  
Marsh Landing LLC  
Marsh Landing Generating Station

*Attachments*

Table 1:	Quarterly Results for Combined Wastewater (FAC Combined)
Table 2:	Semiannual Results for Combined Wastewater (FAC Combined)
Table 3:	January 2025 Monthly Flow Data
Table 4:	February 2025 Monthly Flow Data
Table 5:	March 2025 Monthly Flow Data

Attachment 1:	pH COC
Attachment 2:	Analytical Reports

Table 1  
 Quarterly Results for Combined Wastewater (FAC Combined)

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue
	Antioch CA 94509

Sample Station Location	FAC Combined
Sample Station Description	Local Limits FAC Combined Wastewater
Reporting Period	January - March 2025
Report Type	Quarterly

Constituent	Sample Date	Permit Limit	Result	Units
Field pH	2/4/2025	6-10	6.1	S.U.
BOD	2/4/2025	-	ND	mg/L
COD	2/4/2025	-	6.1	mg/L
Arsenic	2/4/2025	0.15	0.00035 J	mg/L
Cadmium	2/4/2025	0.1	ND	mg/L
Chromium	2/4/2025	0.5	0.00040 J	mg/L
Copper	2/4/2025	0.5	0.0026	mg/L
Iron	2/4/2025	-	0.093	mg/L
Lead	2/4/2025	0.5	ND	mg/L
Mercury	2/4/2025	0.003	ND	mg/L
Molybdenum	2/4/2025	-	0.00099	mg/L
Nickel	2/4/2025	0.5	0.0019	mg/L
Selenium	2/4/2025	0.25	ND	mg/L
Silver	2/4/2025	0.2	ND	mg/L
Zinc	2/4/2025	1.0	0.027	mg/L
TDS	2/4/2025	-	204	mg/L
TSS	2/4/2025	-	1.20	mg/L

J = The reported concentration is an estimated value.

mg/L = Milligrams per Liter

ND = Not detected at or above the laboratory Method Detection Limit or Reporting Limit.

Table 2  
 Semiannual Results for Combined Wastewater (FAC Combined)

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue
	Antioch CA 94509

Sample Station Location	FAC Combined
Sample Station Description	Local Limits FAC Combined Wastewater
Reporting Period	January - June 2025
Report Type	Semi-Annual

Constituent	Sample Date	Permit Limit	Result	Units
Cyanide	2/4/2025	0.20	0.00160	mg/L
Total Phenolics (EPA 420.4)	2/4/2025	1.0	ND	mg/L
Ammonia as N	2/4/2025	200	0.17	mg/L
Oil and Grease Animal/Vegetable (HEM)	2/4/2025	300	ND	mg/L
Oil and Grease Petroleum/Mineral (SGT-HEM)	2/4/2025	100	ND	mg/L
<b>ORGANICS (EPA 624.1, 625.1, 608.3)</b>	2/4/2025			
<i>Bromodichloromethane</i>	2/4/2025	-	0.00100	mg/L
<i>Bromoform</i>	2/4/2025	-	0.00041 J	mg/L
<i>Chloroform</i>	2/4/2025	-	0.00063	mg/L
<i>Dibromochloromethane</i>	2/4/2025	-	0.00110	mg/L
<i>bis (2-Ethylhexyl) phthalate</i>	2/4/2025	-	0.00014 J	mg/L
<i>Diethyl phthalate</i>	2/4/2025	-	0.000022 J	mg/L
<i>Dimethylphthalate</i>	2/4/2025	-	0.0000070 J	mg/L
<i>Di-n-butyl Phthalate</i>	2/4/2025	-	0.000080 J	mg/L
<b>TOTAL TOXIC ORGANICS</b>	2/4/2025	<b>2.0</b>	<b>0.00273</b>	mg/L

J = The reported concentration is an estimated value and is not included in Total Toxic Organic totals.

mg/L = Milligrams per Liter

ND = Not detected at or above the laboratory Method Detection Limit or Reporting Limit.

Table 3  
 Monthly Flow Data

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue Antioch CA 94509
Sample Station Location	Outfall #4
Sample Station Description	Flow Monitoring Structure
Reporting Period	January, 2025
Report Type	Quarterly
Constituent	Flow
Sample Type	Continuous, measured by flow meter
Sample Date	1/1/2025 - 1/31/2025
Permit Limits (s.u.)	NTE 30,240 gpd. NTE 21 gpm +10% for 15 consecutive minutes or 30 minutes in a 24-hour period

Day	Total Flow (gpd)	Instantaneous Max (gpm)	Minutes per Day of Flow exceeding 21 (+10% = 23.1)
1	4,846	20.46	
2	2,624	19.18	
3	0	0.00	
4	4,711	22.26	
5	0	0.00	
6	0	0.00	
7	3,723	20.48	
8	0	0.00	
9	0	0.00	
10	451	16.45	
11	0	0.00	
12	0	0.00	
13	4,715	20.35	
14	11,199	19.23	
15	556	19.06	
16	11,833	19.18	
17	4,155	21.00	
18	9,167	19.10	
19	2,957	2.10	
20	2,949	2.11	
21	5,216	19.10	
22	3,027	2.19	
23	8,228	19.17	
24	3,044	2.21	
25	3,075	2.18	
26	3,061	2.19	
27	3,069	2.21	
28	20,139	19.62	
29	27,360	19.08	
30	11,177	19.04	
31	3,122	2.23	

Total Monthly Flow (gal)	154,404	Did flow exceed limits?	NO
Daily Max Flow (gpd)	27,360	Flow above daily max (30,240 gpd)?	NO
Average Monthly Flow (gpd)	4,981		



Table 4  
 Monthly Flow Data

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue Antioch CA 94509
Sample Station Location	Outfall #4
Sample Station Description	Flow Monitoring Structure
Reporting Period	February, 2025
Report Type	Quarterly
Constituent	Flow
Sample Type	Continuous, measured by flow meter
Sample Date	2/1/2025 - 2/28/2025
Permit Limits (s.u.)	NTE 30,240 gpd. NTE 21 gpm +10% for 15 consecutive minutes or 30 minutes in a 24-hour period

Day	Total Flow (gpd)	Instantaneous Max (gpm)	Minutes per Day of Flow exceeding 21 (+10% = 23.1)
1	4,035	19.06	
2	2,716	1.96	
3	20,139	20.64	
4	24,631	20.81	
5	13,600	19.18	
6	6,926	19.08	
7	6,554	20.61	
8	4,831	19.49	
9	0	0.00	
10	0	0.00	
11	0	0.00	
12	4,340	20.53	
13	23,794	19.11	
14	5,063	20.28	
15	4,248	19.10	
16	0	0.00	
17	3,958	18.85	
18	5,372	19.40	
19	80	80.00	
20	0	0.00	
21	3,695	20.35	
22	5,941	19.36	
23	0	0.00	
24	0	0.00	
25	10,982	19.38	
26	0	0.00	
27	0	0.00	
28	0	0.00	
Total Monthly Flow (gal)	150,905	Did flow exceed limits?	NO
Daily Max Flow (gpd)	24,631	Flow above daily max (30,240 gpd)?	NO
Average Monthly Flow (gpd)	5,389		

Table 5  
 Monthly Flow Data

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue
	Antioch CA 94509
Sample Station Location	Outfall #4
Sample Station Description	Flow Monitoring Structure
Reporting Period	March, 2025
Report Type	Quarterly
Constituent	Flow
Sample Type	Continuous, measured by flow meter
Sample Date	3/1/2025 - 3/31/2025
Permit Limits (s.u.)	NTE 30,240 gpd. NTE 21 gpm +10% for 15 consecutive minutes or 30 minutes in a 24-hour period

Day	Total Flow (gpd)	Instantaneous Max (gpm)	Minutes per Day of Flow exceeding 21 (+10% = 23.1)
1	423	16.22	
2	0	0.00	
3	0	0.00	
4	4,150	20.70	
5	4,874	19.17	
6	3,977	19.39	
7	0	0.00	
8	0	0.00	
9	0	0.00	
10	439	16.47	
11	3,787	20.59	
12	0	0.00	
13	450	15.90	
14	0	0.00	
15	0	0.00	
16	0	0.00	
17	9,442	20.28	
18	4,994	19.10	
19	0	0.00	
20	0	0.00	
21	0	0.00	
22	0	0.00	
23	4,614	19.79	
24	4,164	19.70	
25	6,066	19.09	
26	0	0.00	
27	493	15.67	
28	0	0.00	
29	0	0.00	
30	0	0.00	
31	0	0.00	

Total Monthly Flow (gal)	47,873	Did flow exceed limits?	NO
Daily Max Flow (gpd)	9,442	Flow above daily max (30,240 gpd)?	NO
Average Monthly Flow (gpd)	1,544		

Marsh Landing Generating Station

Reported to:  
Environmental Engineer

# NPDES Monthly Analytical Report

Sample Point	Sample Number	Sample Date	Sample Collection Time	Date Analyzed	pH Analysis Time	Sample Medium	Sample Type (Grab)	pH
IW-001	ML25-047	2/4/25	1000	2/4/25	1000	Wastewater	Grab	6.1
							<i>Method:</i>	SM 4500-H+B
							<i>Unit:</i>	standard
							<i>Reporting Limit:</i>	0.18
							<i>Method Detection Limit:</i>	0.06

SM = Standard Method; ppm = parts per million; mg/L = milligrams per liter; N/A = not applicable

Environmental Engineer David Frandsen

Signature: 

Date: Feb 4, 25

Sampling Technologist: Ryan Robinson

Signature: 

Date: 2/4/2025



# McC Campbell Analytical, Inc.

"When Quality Counts"

## Analytical Report

**WorkOrder:** 2502181 **Amended:** 02/19/2025

**Revision:** 1

**Report Created for:** NRG Energy, LLC

3201 Wilbur Avenue  
Antioch, CA 94509

**Project Contact:** David Frandsen

**Project P.O.:** 4501937084

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)

**Project Location:** Antioch, CA

**Project Received:** 02/04/2025

Analytical Report reviewed & approved for release on 02/18/2025 by:

Jena Alfaro

Project Manager

*The report shall not be reproduced except in full, without the written approval of the laboratory. The analytical results relate only to the items tested. Results reported conform to the most current regulatory standards, where applicable, unless otherwise stated in a case narrative.*





## Revision History

**Client:** NRG Energy, LLC

**WorkOrder:** 2502181

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)

<u>Date</u>	<u>Revision</u>	<u>Reason</u>
02/19/2025	1	Revised to add missing 11DCE, 12DCA, and 4,6-Dinitro-2-methylphenol.



## Glossary of Terms & Qualifier Definitions

**Client:** NRG Energy, LLC

**WorkOrder:** 2502181

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)

### Glossary Abbreviation

%D	Serial Dilution Percent Difference
95% Interval	95% Confident Interval
CCV	Continuing Calibration Verification.
CCV REC (%)	% recovery of Continuing Calibration Verification.
CPT	Consumer Product Testing not NELAP Accredited
DF	Dilution Factor
DI WET	(DISTLC) Waste Extraction Test using DI water
DISS	Dissolved (direct analysis of 0.45 µm filtered and acidified water sample)
DLT	Dilution Test (Serial Dilution)
DUP	Duplicate
EDL	Estimated Detection Limit
ERS	External reference sample. Second source calibration verification.
ITEF	International Toxicity Equivalence Factor
LCS	Laboratory Control Sample
LCS2	Second LCS for the batch. Spike level is lower than that for the first LCS; applicable to method 1633.
LQL	Lowest Quantitation Level
MB	Method Blank
MB IS/SS % Rec	% Recovery of Internal Standard or Surrogate in Method Blank, if applicable
MB SS % Rec	% Recovery of Surrogate in Method Blank, if applicable
MDL	Method Detection Limit <sup>1</sup>
ML	Minimum Level of Quantitation
MS	Matrix Spike
MSD	Matrix Spike Duplicate
NA	Not Applicable
ND	Not detected at or above the indicated MDL or RL
NR	Data Not Reported due to matrix interference or insufficient sample amount.
PDS	Post Digestion Spike
PF	Prep Factor
RD	Relative Difference
RL	Reporting Limit <sup>2</sup>
RPD	Relative Percent Difference
RRT	Relative Retention Time
RSD	Relative Standard Deviation
SNR	Surrogate is diluted out of the calibration range

<sup>1</sup> MDL is the minimum measured concentration of a substance that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results. Definition and Procedure for the Determination of the Method Detection Limit, Revision 2, 40CFR, Part 136, Appendix B, EPA 821-R-16-006, December 2016. Values are based upon our default extraction volume/amount and are subject to change.

<sup>2</sup> RL is the lowest level that can be reliably determined within specified limits of precision and accuracy during routine laboratory operating conditions. (The RL cannot be lower than the lowest calibration standard used in the initial calibration of the instrument and must be greater than the MDL.) Values are based upon our default extraction volume/amount and are subject to change.



## Glossary of Terms & Qualifier Definitions

**Client:** NRG Energy, LLC

**WorkOrder:** 2502181

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)

SPK Val	Spike Value
SPKRef Val	Spike Reference Value
SPLP	Synthetic Precipitation Leachate Procedure
ST	Sorbent Tube
TCLP	Toxicity Characteristic Leachate Procedure
TEQ	Toxicity Equivalents
TNTC	"Too Numerous to Count;" greater than 250 colonies observed on the plate.
TZA	TimeZone Net Adjustment for sample collected outside of MAI's Coordinated Universal Time (UTC). (Adjustment for Daylight Saving is not accounted.)
WET (STLC)	Waste Extraction Test (Soluble Threshold Limit Concentration)

### Analytical Qualifiers

J	Result is less than the RL/ML but greater than the MDL. The reported concentration is an estimated value.
a2	Sample diluted due to cluttered chromatogram.
b9	Sediment observed in aqueous sample prior to extraction.
h1	Florisil (EPA 3620) cleanup
h7	Copper (EPA 3660B) cleanup
m1	Based on the method limit threshold, the sample tested produced a result below the threshold of 2.5mg of dried residue.

### Quality Control Qualifiers

F2	LCS/LCSD recovery and/or RPD/RSD is out of acceptance criteria.
F5	LCS/LCSD recovery is outside of acceptance limits; however, the data is acceptable based upon the TNI allowable marginal exceedances.



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	E1664A_SG
<b>Date Prepared:</b>	02/18/2025	<b>Analytical Method:</b>	E1664A
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

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### Hexane Extractable Material (HEM; Oil & Grease) with Silica Gel Clean-Up

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Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-047	2502181-001A	Water	02/04/2025 10:00	O&G	311540

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
SGT-HEM	ND	1.6	4.7	1	02/18/2025 11:30

Analyst(s): LAM

Analytical Comments: b9

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## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	E1664A
<b>Date Prepared:</b>	02/14/2025	<b>Analytical Method:</b>	E1664A
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

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### Hexane Extractable Material (HEM; Oil & Grease) without Silica Gel Clean-Up

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Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-048	2502181-001B	Water	02/04/2025 10:00	O&G	311435

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
HEM	ND	1.6	4.9	1	02/14/2025 15:05

Analyst(s): HN

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## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	E608.3/SW3620B
<b>Date Prepared:</b>	02/05/2025	<b>Analytical Method:</b>	E608.3
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Organochlorine Pesticides + PCBs w/ Florisil Clean-up

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-053	2502181-001G	Water	02/04/2025 10:00	GC40 02072530.d	310792

Analytes	Result	MDL	RL	DF	Date Analyzed
Aldrin	ND	0.000003	0.0000050	5	02/07/2025 19:45
a-BHC	ND	0.000005	0.000010	5	02/07/2025 19:45
b-BHC	ND	0.000004	0.000010	5	02/07/2025 19:45
d-BHC	ND	0.000002	0.000010	5	02/07/2025 19:45
g-BHC	ND	0.000003	0.000010	5	02/07/2025 19:45
Chlordane (Technical)	ND	0.000070	0.00025	5	02/07/2025 19:45
a-Chlordane	ND	0.000002	0.0000050	5	02/07/2025 19:45
g-Chlordane	ND	0.000002	0.0000050	5	02/07/2025 19:45
p,p-DDD	ND	0.000002	0.0000050	5	02/07/2025 19:45
p,p-DDE	ND	0.000003	0.0000050	5	02/07/2025 19:45
p,p-DDT	ND	0.000003	0.0000050	5	02/07/2025 19:45
Dieldrin	ND	0.000002	0.0000050	5	02/07/2025 19:45
Endosulfan I	ND	0.000002	0.0000050	5	02/07/2025 19:45
Endosulfan II	ND	0.000002	0.0000050	5	02/07/2025 19:45
Endosulfan sulfate	ND	0.000002	0.000010	5	02/07/2025 19:45
Endrin	ND	0.000002	0.0000050	5	02/07/2025 19:45
Endrin aldehyde	ND	0.000002	0.0000050	5	02/07/2025 19:45
Heptachlor	ND	0.000003	0.0000050	5	02/07/2025 19:45
Heptachlor epoxide	ND	0.000003	0.0000050	5	02/07/2025 19:45
Toxaphene	ND	0.00010	0.00025	5	02/07/2025 19:45
Aroclor1016	ND	0.000090	0.00025	5	02/07/2025 19:45
Aroclor1221	ND	0.000090	0.00025	5	02/07/2025 19:45
Aroclor1232	ND	0.000090	0.00025	5	02/07/2025 19:45
Aroclor1242	ND	0.000090	0.00025	5	02/07/2025 19:45
Aroclor1248	ND	0.000090	0.00025	5	02/07/2025 19:45
Aroclor1254	ND	0.000090	0.00025	5	02/07/2025 19:45
Aroclor1260	ND	0.000090	0.00025	5	02/07/2025 19:45
PCBs, total	ND	NA	0.00025	5	02/07/2025 19:45
<b>Surrogates</b>	<b>REC (%)</b>	<b>Limits</b>			
Decachlorobiphenyl	70	60-130			02/07/2025 19:45
<b>Analyst(s):</b> EEV		<b>Analytical Comments:</b> a2,h7,h1			



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	E624.1
<b>Date Prepared:</b>	02/05/2025	<b>Analytical Method:</b>	E624.1
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Acrolein, Acrylonitrile, & 2-Chloroethyl Vinyl Ether

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-055	2502181-0011	Water	02/04/2025 10:00	GC10 02052508.D	310881

Analytes	Result	MDL	RL	DF	Date Analyzed
Acrolein (Propenal)	ND	0.0037	0.0050	1	02/05/2025 16:18
Acrylonitrile	ND	0.00027	0.0020	1	02/05/2025 16:18
2-Chloroethyl Vinyl Ether	ND	0.00052	0.0010	1	02/05/2025 16:18

Surrogates	REC (%)	Limits	Date Analyzed
Dibromofluoromethane	101	70-130	02/05/2025 16:18

**Analyst(s):** JEM



## Analytical Report

**Client:** NRG Energy, LLC **WorkOrder:** 2502181  
**Date Received:** 02/04/2025 15:27 **Extraction Method:** E624.1  
**Date Prepared:** 02/06/2025 **Analytical Method:** E624.1  
**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway) **Unit:** mg/L

### Volatile Organics

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-054	2502181-001H	Water	02/04/2025 10:00	GC16 02062511.D	310926

Analytes	Result	Qualifiers	MDL	RL	DF	Date Analyzed
Benzene	ND		0.000035	0.00020	1	02/06/2025 14:26
Bromodichloromethane	<b>0.0010</b>		0.000035	0.000050	1	02/06/2025 14:26
Bromoform	<b>0.00041</b>	J	0.00024	0.00050	1	02/06/2025 14:26
Bromomethane	ND		0.00025	0.00050	1	02/06/2025 14:26
Carbon tetrachloride	ND		0.000034	0.000050	1	02/06/2025 14:26
Chlorobenzene	ND		0.000095	0.00050	1	02/06/2025 14:26
Chloroethane	ND		0.00025	0.00050	1	02/06/2025 14:26
Chloroform	<b>0.00063</b>		0.000043	0.00010	1	02/06/2025 14:26
Chloromethane	ND		0.00016	0.00050	1	02/06/2025 14:26
Dibromochloromethane	<b>0.0011</b>		0.000073	0.00015	1	02/06/2025 14:26
1,2-Dichlorobenzene	ND		0.00010	0.00050	1	02/06/2025 14:26
1,3-Dichlorobenzene	ND		0.00014	0.00050	1	02/06/2025 14:26
1,4-Dichlorobenzene	ND		0.000089	0.00050	1	02/06/2025 14:26
1,1-Dichloroethane	ND		0.00014	0.00050	1	02/06/2025 14:26
1,2-Dichloroethane (1,2-DCA)	ND		0.000009	0.000020	1	02/06/2025 14:26
1,1-Dichloroethene	ND		0.000005	0.000010	1	02/06/2025 14:26
trans-1,2-Dichloroethene	ND		0.00015	0.00050	1	02/06/2025 14:26
1,2-Dichloropropane	ND		0.000039	0.00010	1	02/06/2025 14:26
cis-1,3-Dichloropropene	ND		0.00013	0.00050	1	02/06/2025 14:26
trans-1,3-Dichloropropene	ND		0.00020	0.00050	1	02/06/2025 14:26
Ethylbenzene	ND		0.00010	0.00050	1	02/06/2025 14:26
Methylene chloride	ND		0.0015	0.0020	1	02/06/2025 14:26
1,1,2,2-Tetrachloroethane	ND		0.000015	0.000020	1	02/06/2025 14:26
Tetrachloroethene	ND		0.000036	0.00020	1	02/06/2025 14:26
Toluene	ND		0.00010	0.00050	1	02/06/2025 14:26
1,1,1-Trichloroethane	ND		0.00013	0.00050	1	02/06/2025 14:26
1,1,2-Trichloroethane	ND		0.000032	0.00010	1	02/06/2025 14:26
Trichloroethene	ND		0.000034	0.00010	1	02/06/2025 14:26
Trichlorofluoromethane	ND		0.00014	0.00050	1	02/06/2025 14:26
Vinyl chloride	ND		0.000004	0.0000050	1	02/06/2025 14:26

(Cont.)



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	E624.1
<b>Date Prepared:</b>	02/06/2025	<b>Analytical Method:</b>	E624.1
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Volatile Organics

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-054	2502181-001H	Water	02/04/2025 10:00	GC16 02062511.D	310926

Analytes	Result	Qualifiers	MDL	RL	DF	Date Analyzed
<u>Surrogates</u>	<u>REC (%)</u>			<u>Limits</u>		
Dibromofluoromethane	88			70-130		02/06/2025 14:26
Toluene-d8	101			70-130		02/06/2025 14:26
4-BFB	94			70-130		02/06/2025 14:26

Analyst(s): CLO



# Analytical Report

**Client:** NRG Energy, LLC **WorkOrder:** 2502181  
**Date Received:** 02/04/2025 15:27 **Extraction Method:** E625.1  
**Date Prepared:** 02/04/2025 **Analytical Method:** E625.1  
**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway) **Unit:** mg/L

## Semi-Volatile Organics

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-052	2502181-001F	Water	02/04/2025 10:00	GC17 02102516.D	310729

Analytes	Result	Qualifiers	MDL	RL	DF	Date Analyzed
Acenaphthene	ND		0.000002	0.0000047	1	02/10/2025 15:28
Acenaphthylene	ND		0.000001	0.0000047	1	02/10/2025 15:28
Anthracene	ND		0.000001	0.0000047	1	02/10/2025 15:28
Benzydine	ND		0.0026	0.0047	1	02/10/2025 15:28
Benzo (a) anthracene	ND		0.000019	0.000047	1	02/10/2025 15:28
Benzo (a) pyrene	ND		0.000004	0.0000047	1	02/10/2025 15:28
Benzo (b) fluoranthene	ND		0.000005	0.0000095	1	02/10/2025 15:28
Benzo (g,h,i) perylene	ND		0.000003	0.0000095	1	02/10/2025 15:28
Benzo (k) fluoranthene	ND		0.000004	0.0000095	1	02/10/2025 15:28
Bis (2-chloroethoxy) Methane	ND		0.00048	0.00095	1	02/10/2025 15:28
Bis (2-chloroethyl) Ether	ND		0.000004	0.0000047	1	02/10/2025 15:28
Bis (2-chloroisopropyl) Ether	ND		0.000004	0.0000095	1	02/10/2025 15:28
Bis (2-ethylhexyl) Phthalate	<b>0.00014</b>	J	0.00012	0.00024	1	02/10/2025 15:28
4-Bromophenyl Phenyl Ether	ND		0.00028	0.00095	1	02/10/2025 15:28
Butylbenzyl Phthalate	ND		0.000077	0.00024	1	02/10/2025 15:28
4-Chloro-3-methylphenol	ND		0.00056	0.00095	1	02/10/2025 15:28
2-Chloronaphthalene	ND		0.00053	0.00095	1	02/10/2025 15:28
2-Chlorophenol	ND		0.000034	0.000047	1	02/10/2025 15:28
4-Chlorophenyl Phenyl Ether	ND		0.00046	0.00095	1	02/10/2025 15:28
Chrysene	ND		0.000002	0.0000047	1	02/10/2025 15:28
Dibenzo (a,h) anthracene	ND		0.000004	0.0000095	1	02/10/2025 15:28
Di-n-butyl Phthalate	<b>0.000080</b>	J	0.000074	0.00024	1	02/10/2025 15:28
1,2-Dichlorobenzene	ND		0.00050	0.00095	1	02/10/2025 15:28
1,3-Dichlorobenzene	ND		0.00056	0.00095	1	02/10/2025 15:28
1,4-Dichlorobenzene	ND		0.00042	0.00095	1	02/10/2025 15:28
3,3-Dichlorobenzidine	ND		0.000005	0.0000095	1	02/10/2025 15:28
2,4-Dichlorophenol	ND		0.000005	0.0000095	1	02/10/2025 15:28
Diethyl Phthalate	<b>0.000022</b>	J	0.000020	0.000047	1	02/10/2025 15:28
2,4-Dimethylphenol	ND		0.00050	0.00095	1	02/10/2025 15:28
Dimethyl Phthalate	<b>0.0000070</b>	J	0.000005	0.0000095	1	02/10/2025 15:28
4,6-Dinitro-2-methylphenol	ND		0.0035	0.0047	1	02/10/2025 15:28
2,4-Dinitrophenol	ND		0.00065	0.00095	1	02/10/2025 15:28
2,4-Dinitrotoluene	ND		0.000026	0.000047	1	02/10/2025 15:28
2,6-Dinitrotoluene	ND		0.000028	0.000047	1	02/10/2025 15:28
Di-n-octyl Phthalate	ND		0.0011	0.0024	1	02/10/2025 15:28

(Cont.)



# Analytical Report

**Client:** NRG Energy, LLC **WorkOrder:** 2502181  
**Date Received:** 02/04/2025 15:27 **Extraction Method:** E625.1  
**Date Prepared:** 02/04/2025 **Analytical Method:** E625.1  
**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway) **Unit:** mg/L

## Semi-Volatile Organics

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-052	2502181-001F	Water	02/04/2025 10:00	GC17 02102516.D	310729

Analytes	Result	Qualifiers	MDL	RL	DF	Date Analyzed
1,2-Diphenylhydrazine	ND		0.00040	0.00095	1	02/10/2025 15:28
Fluoranthene	ND		0.000003	0.0000095	1	02/10/2025 15:28
Fluorene	ND		0.000001	0.0000095	1	02/10/2025 15:28
Hexachlorobenzene	ND		0.000001	0.0000047	1	02/10/2025 15:28
Hexachlorobutadiene	ND		0.000001	0.0000047	1	02/10/2025 15:28
Hexachlorocyclopentadiene	ND		0.0022	0.0047	1	02/10/2025 15:28
Hexachloroethane	ND		0.000003	0.0000095	1	02/10/2025 15:28
Indeno (1,2,3-cd) pyrene	ND		0.000006	0.0000095	1	02/10/2025 15:28
Isophorone	ND		0.00043	0.00095	1	02/10/2025 15:28
Naphthalene	ND		0.000006	0.0000095	1	02/10/2025 15:28
Nitrobenzene	ND		0.00058	0.00095	1	02/10/2025 15:28
2-Nitrophenol	ND		0.0028	0.0047	1	02/10/2025 15:28
4-Nitrophenol	ND		0.0034	0.0047	1	02/10/2025 15:28
N-Nitrosodimethylamine	ND		0.0034	0.0047	1	02/10/2025 15:28
N-Nitrosodiphenylamine	ND		0.00034	0.00095	1	02/10/2025 15:28
N-Nitrosodi-n-propylamine	ND		0.00057	0.00095	1	02/10/2025 15:28
Pentachlorophenol	ND		0.00015	0.00024	1	02/10/2025 15:28
Phenanthrene	ND		0.000003	0.0000047	1	02/10/2025 15:28
Phenol	ND		0.000018	0.000038	1	02/10/2025 15:28
Pyrene	ND		0.000002	0.0000047	1	02/10/2025 15:28
1,2,4-Trichlorobenzene	ND		0.00049	0.00095	1	02/10/2025 15:28
2,4,6-Trichlorophenol	ND		0.000005	0.0000095	1	02/10/2025 15:28

Surrogates	REC (%)	Limits
2-Fluorophenol	49	30-130
Phenol-d5	34	20-130
Nitrobenzene-d5	68	60-130
2-Fluorobiphenyl	63	50-130
2,4,6-Tribromophenol	67	60-140
4-Terphenyl-d14	65	40-130

**Analyst(s):** LAT



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	E350.1
<b>Date Prepared:</b>	02/10/2025	<b>Analytical Method:</b>	E350.1
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Ammonia As Nitrogen

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-051	2502181-001E	Water	02/04/2025 10:00	WC_SKALAR 250210A1_57	311098

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
Ammonia, total as N	<b>0.17</b>	0.089	0.10	1	02/10/2025 13:55

Analyst(s): IGC





## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	SM5210B
<b>Date Prepared:</b>	02/05/2025	<b>Analytical Method:</b>	SM5210 B
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Biochemical Oxygen Demand (BOD)

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-057	2502181-001K	Water	02/04/2025 10:00	WetChem	310844

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
BOD	ND	2.0	2.0	1.02	02/10/2025 14:40

Analyst(s): JME



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	Kelada-01
<b>Date Prepared:</b>	02/13/2025	<b>Analytical Method:</b>	Kelada-01
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Cyanide, Total

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-049	2502181-001C	Water	02/04/2025 10:00	WC_Skalar3 250213A1_36	311376

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
Total Cyanide	<b>0.0016</b>	0.00068	0.0010	1	02/13/2025 14:46

Analyst(s): JRA



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	SM5220 D
<b>Date Prepared:</b>	02/06/2025	<b>Analytical Method:</b>	SM5220 D
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Chemical Oxygen Demand (COD) as mg O<sub>2</sub> /L

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-056	2502181-001J	Water	02/04/2025 10:00	SPECTROPHOTOMETER2	310887

<u>Analytes</u>	<u>Result</u>	<u>Qualifiers</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
COD	<b>6.1</b>	J	4.8	10	1	02/06/2025 16:12

Analyst(s): AHE



## Analytical Report

**Client:** NRG Energy, LLC **WorkOrder:** 2502181  
**Date Received:** 02/04/2025 15:27 **Extraction Method:** E200.8  
**Date Prepared:** 02/04/2025 **Analytical Method:** E200.8  
**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway) **Unit:** mg/L

### Metals

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-060	2502181-001N	Water	02/04/2025 10:00	ICP-MS6 219SMPL.d	310734

Analytes	Result	Qualifiers	MDL	RL	DF	Date Analyzed
Arsenic	0.00035	J	0.000077	0.00050	1	02/05/2025 17:28
Cadmium	ND		0.000061	0.00050	1	02/05/2025 17:28
Chromium	0.00040	J	0.00033	0.0020	1	02/05/2025 17:28
Copper	0.0026		0.00063	0.0015	1	02/05/2025 17:28
Iron	0.093		0.021	0.050	1	02/05/2025 17:28
Lead	ND		0.00021	0.00050	1	02/05/2025 17:28
Mercury	ND		0.000026	0.000050	1	02/05/2025 17:28
Molybdenum	0.00099		0.00018	0.00050	1	02/05/2025 17:28
Nickel	0.0019		0.00024	0.00050	1	02/05/2025 17:28
Selenium	ND		0.00017	0.00050	1	02/05/2025 17:28
Silver	ND		0.000058	0.00050	1	02/05/2025 17:28
Zinc	0.027		0.011	0.020	1	02/05/2025 17:28

Surrogates	REC (%)	Limits
Terbium	106	70-130

Analyst(s): DB



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	E420.4
<b>Date Prepared:</b>	02/11/2025	<b>Analytical Method:</b>	E420.4
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Phenolics

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-050	2502181-001D	Water	02/04/2025 10:00	WC_SKALAR 250211A1_37	311204

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
Phenolics	ND	0.0015	0.0020	1	02/11/2025 16:45

Analyst(s): IGC



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	SM2540 C-
<b>Date Prepared:</b>	02/07/2025	<b>Analytical Method:</b>	SM2540 C
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Total Dissolved Solids

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-058	2502181-001L	Water	02/04/2025 10:00	WetChem	311062

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
Total Dissolved Solids	<b>204</b>	10.0	10.0	1	02/10/2025 12:15

Analyst(s): ISH



## Analytical Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Received:</b>	02/04/2025 15:27	<b>Extraction Method:</b>	SM2540 D
<b>Date Prepared:</b>	02/05/2025	<b>Analytical Method:</b>	SM2540 D
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Unit:</b>	mg/L

### Total Suspended Solids

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001 ML25-059	2502181-001M	Water	02/04/2025 10:00	WetChem	310862

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
Total Suspended Solids	<b>1.20</b>	1.00	1.00	1	02/06/2025 13:00

Analyst(s): ISH

Analytical Comments: m1



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/18/2025	<b>BatchID:</b> 311540
<b>Date Analyzed:</b> 02/18/2025	<b>Extraction Method:</b> E1664A_SG
<b>Instrument:</b> O&G	<b>Analytical Method:</b> E1664A
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-311540

### QC Summary Report for E1664A

Analyte	MB Result	MDL	RL			
HEM	ND	1.6	5.0	-	-	-
SGT-HEM	ND	1.7	5.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
HEM	17	18	20	83	91	78-114	9.99	30
SGT-HEM	6.9	8.5	10	69	85	64-132	20.3	30





## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/14/2025	<b>BatchID:</b> 311435
<b>Date Analyzed:</b> 02/14/2025	<b>Extraction Method:</b> E1664A
<b>Instrument:</b> O&G	<b>Analytical Method:</b> E1664A
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-311435

### QC Summary Report for E1664A

Analyte	MB Result	MDL	RL			
HEM	ND	1.6	5.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
HEM	17	17	20	84	85	78-114	0.473	30



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/05/2025	<b>BatchID:</b> 310792
<b>Date Analyzed:</b> 02/05/2025	<b>Extraction Method:</b> E608.3/SW3620B
<b>Instrument:</b> GC40	<b>Analytical Method:</b> E608.3
<b>Matrix:</b> Water	<b>Unit:</b> µg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-310792

### QC Summary Report for E608.3 w/ Florisil Clean-up

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
Aldrin	ND	0.00078	0.0010	-	-	-
a-BHC	ND	0.0010	0.0020	-	-	-
b-BHC	ND	0.00081	0.0020	-	-	-
d-BHC	ND	0.00057	0.0020	-	-	-
g-BHC	ND	0.00063	0.0020	-	-	-
Chlordane (Technical)	ND	0.014	0.050	-	-	-
a-Chlordane	ND	0.00047	0.0010	-	-	-
g-Chlordane	ND	0.00048	0.0010	-	-	-
p,p-DDD	ND	0.00051	0.0010	-	-	-
p,p-DDE	ND	0.00060	0.0010	-	-	-
p,p-DDT	ND	0.00063	0.0010	-	-	-
Dieldrin	ND	0.00042	0.0010	-	-	-
Endosulfan I	ND	0.00043	0.0010	-	-	-
Endosulfan II	ND	0.00054	0.0010	-	-	-
Endosulfan sulfate	ND	0.00053	0.0020	-	-	-
Endrin	ND	0.00055	0.0010	-	-	-
Endrin aldehyde	ND	0.00042	0.0010	-	-	-
Endrin ketone	ND	0.00058	0.0010	-	-	-
Heptachlor	ND	0.00067	0.0010	-	-	-
Heptachlor epoxide	ND	0.00065	0.0010	-	-	-
Methoxychlor	ND	0.00052	0.0010	-	-	-
Toxaphene	ND	0.020	0.050	-	-	-
Aroclor1016	ND	0.018	0.050	-	-	-
Aroclor1221	ND	0.018	0.050	-	-	-
Aroclor1232	ND	0.018	0.050	-	-	-
Aroclor1242	ND	0.018	0.050	-	-	-
Aroclor1248	ND	0.018	0.050	-	-	-
Aroclor1254	ND	0.018	0.050	-	-	-
Aroclor1260	ND	0.018	0.050	-	-	-
<b>Surrogate Recovery</b>						
Decachlorobiphenyl	0.056			0.05	113	60-130

(Cont.)



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/05/2025	<b>BatchID:</b>	310792
<b>Date Analyzed:</b>	02/05/2025	<b>Extraction Method:</b>	E608.3/SW3620B
<b>Instrument:</b>	GC40	<b>Analytical Method:</b>	E608.3
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310792

### QC Summary Report for E608.3 w/ Florisil Clean-up

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Aldrin	0.044	0.038	0.050	87	76	54-130	13.1	20
a-BHC	0.045	0.039	0.050	89	78	70-130	13.6	20
b-BHC	0.047	0.042	0.050	95	84	70-130	12.1	20
d-BHC	0.044	0.039	0.050	87	77	70-130	12.0	20
g-BHC	0.045	0.039	0.050	90	78	60-130	14.0	20
a-Chlordane	0.050	0.044	0.050	99	88	55-130	12.0	20
g-Chlordane	0.050	0.043	0.050	99	86	55-130	14.7	20
p,p-DDD	0.056	0.050	0.050	111	100	70-130	10.9	20
p,p-DDE	0.055	0.049	0.050	109	97	70-130	11.9	20
p,p-DDT	0.060	0.054	0.050	121	109	70-130	10.7	20
Dieldrin	0.055	0.048	0.050	109	96	70-130	12.4	20
Endosulfan I	0.056	0.049	0.050	112	99	70-130	12.5	20
Endosulfan II	0.056	0.050	0.050	113	101	70-130	11.2	20
Endosulfan sulfate	0.060	0.055	0.050	120	110	70-130	8.73	20
Endrin	0.060	0.053	0.050	120	106	70-130	12.2	20
Endrin aldehyde	0.051	0.047	0.050	103	93	60-130	9.74	20
Endrin ketone	0.059	0.053	0.050	118	105	60-130	11.3	20
Heptachlor	0.048	0.042	0.050	96	84	43-130	13.1	20
Heptachlor epoxide	0.055	0.049	0.050	111	97	70-130	12.7	20
Methoxychlor	0.071	0.063	0.050	142,F2	127	70-130	11.1	20
Aroclor1016	0.15	0.15	0.15	100	101	70-130	1.86	20
Aroclor1260	0.13	0.14	0.15	90	92	70-130	2.67	20
<b>Surrogate Recovery</b>								
Decachlorobiphenyl	0.058	0.050	0.050	115	100	60-130	14.0	20



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/05/2025	<b>BatchID:</b> 310881
<b>Date Analyzed:</b> 02/05/2025	<b>Extraction Method:</b> E624.1
<b>Instrument:</b> GC10	<b>Analytical Method:</b> E624.1
<b>Matrix:</b> Water	<b>Unit:</b> µg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-310881

### QC Summary Report for E624.1

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
Acrolein (Propenal)	ND	3.7	5.0	-	-	-
Acrylonitrile	ND	0.27	2.0	-	-	-
2-Chloroethyl vinyl ether	ND	0.52	1.0	-	-	-
<b>Surrogate Recovery</b>						
Dibromofluoromethane	26			25	102	70-130

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Acrolein (Propenal)	21	22	20	106	108	71-140	1.59	20
Acrylonitrile	17	17	20	86	85	67-145	1.32	20
2-Chloroethyl vinyl ether	19	18	20	95	91	70-124	3.95	20
<b>Surrogate Recovery</b>								
Dibromofluoromethane	25	25	25	99	100	70-130	0.424	20



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/06/2025	<b>BatchID:</b>	310926
<b>Date Analyzed:</b>	02/06/2025	<b>Extraction Method:</b>	E624.1
<b>Instrument:</b>	GC16	<b>Analytical Method:</b>	E624.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310926

### QC Summary Report for E624.1

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
Benzene	ND	0.035	0.20	-	-	-
Bromodichloromethane	ND	0.035	0.050	-	-	-
Bromoform	ND	0.24	0.50	-	-	-
Bromomethane	ND	0.25	0.50	-	-	-
Carbon tetrachloride	ND	0.034	0.050	-	-	-
Chlorobenzene	ND	0.095	0.50	-	-	-
Chloroethane	ND	0.25	0.50	-	-	-
Chloroform	ND	0.043	0.10	-	-	-
Chloromethane	ND	0.16	0.50	-	-	-
Dibromochloromethane	ND	0.073	0.15	-	-	-
1,2-Dichlorobenzene	ND	0.10	0.50	-	-	-
1,3-Dichlorobenzene	ND	0.14	0.50	-	-	-
1,4-Dichlorobenzene	ND	0.089	0.50	-	-	-
1,1-Dichloroethane	ND	0.14	0.50	-	-	-
1,2-Dichloroethane (1,2-DCA)	ND	0.0093	0.020	-	-	-
1,1-Dichloroethene	ND	0.0058	0.010	-	-	-
trans-1,2-Dichloroethene	ND	0.15	0.50	-	-	-
1,2-Dichloropropane	ND	0.039	0.10	-	-	-
cis-1,3-Dichloropropene	ND	0.13	0.50	-	-	-
trans-1,3-Dichloropropene	ND	0.20	0.50	-	-	-
Ethylbenzene	ND	0.10	0.50	-	-	-
Methylene chloride	ND	1.5	2.0	-	-	-
Styrene	ND	0.22	2.0	-	-	-
1,1,2,2-Tetrachloroethane	ND	0.015	0.020	-	-	-
Tetrachloroethene	ND	0.036	0.20	-	-	-
Toluene	ND	0.10	0.50	-	-	-
1,1,1-Trichloroethane	ND	0.13	0.50	-	-	-
1,1,2-Trichloroethane	ND	0.032	0.10	-	-	-
Trichloroethene	ND	0.034	0.10	-	-	-
Trichlorofluoromethane	ND	0.14	0.50	-	-	-
Vinyl chloride	ND	0.0044	0.0050	-	-	-

#### Surrogate Recovery

Dibromofluoromethane	22	25	89	70-130
Toluene-d8	25	25	101	70-130
4-BFB	2.5	2.5	98	70-130

(Cont.)



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/06/2025	<b>BatchID:</b>	310926
<b>Date Analyzed:</b>	02/06/2025	<b>Extraction Method:</b>	E624.1
<b>Instrument:</b>	GC16	<b>Analytical Method:</b>	E624.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310926

### QC Summary Report for E624.1

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Benzene	3.3	3.2	4	81	81	65-130	0.803	20
Bromodichloromethane	3.0	3.0	4	74	75	60-130	0.314	20
Bromoform	3.1	3.1	4	77	78	70-130	1.40	20
Bromomethane	4.7	4.4	4	117	110	50-130	6.96	20
Carbon tetrachloride	2.8	2.7	4	69,F2	68,F2	70-130	0.655	20
Chlorobenzene	3.9	3.8	4	98	96	65-130	1.69	20
Chloroethane	3.0	3.1	4	75	76	60-140	1.33	20
Chloroform	3.1	3.1	4	79	77	70-130	1.37	20
Chloromethane	3.3	3.5	4	82	88	50-130	6.21	20
Dibromochloromethane	3.2	3.2	4	80	80	70-130	0.0395	20
1,2-Dichlorobenzene	3.9	3.8	4	97	96	65-130	1.08	20
1,3-Dichlorobenzene	4.3	4.2	4	108	106	70-130	1.96	20
1,4-Dichlorobenzene	4.2	4.0	4	104	101	65-130	3.56	20
1,1-Dichloroethane	3.4	3.3	4	85	83	70-130	2.29	20
1,2-Dichloroethane (1,2-DCA)	2.7	2.7	4	68,F2	68,F2	70-130	0.270	20
1,1-Dichloroethene	3.2	3.1	4	79	78	60-130	2.06	20
trans-1,2-Dichloroethene	3.3	3.3	4	82	82	70-130	0.286	20
1,2-Dichloropropane	3.5	3.5	4	88	88	60-130	0.0753	20
cis-1,3-Dichloropropene	3.6	3.6	4	91	90	60-130	0.884	20
trans-1,3-Dichloropropene	3.3	3.3	4	82	82	60-130	0.545	20
Ethylbenzene	3.8	3.8	4	96	96	60-130	0.713	20
Methylene chloride	4.2	4.0	4	105	100	60-130	4.40	20
1,1,2,2-Tetrachloroethane	4.2	4.3	4	105	108	60-130	2.36	20
Tetrachloroethene	3.8	3.7	4	95	93	70-130	2.06	20
Toluene	3.6	3.5	4	89	87	70-130	3.07	20
1,1,1-Trichloroethane	2.9	2.9	4	73	73	70-130	0.170	20
1,1,2-Trichloroethane	4.1	3.6	4	102	89	70-130	13.9	20
Trichloroethene	3.6	3.6	4	90	90	65-130	0.452	20
Trichlorofluoromethane	2.9	2.8	4	71	69	60-130	3.88	20
Vinyl chloride	2.0	1.9	2	100	96	60-130	4.07	20
<b>Surrogate Recovery</b>								
Dibromofluoromethane	22	22	25	88	89	70-130	0.856	20
Toluene-d8	26	26	25	103	102	70-130	1.28	20
4-BFB	2.5	2.5	2.5	101	100	70-130	1.33	20



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/04/2025	<b>BatchID:</b>	310729
<b>Date Analyzed:</b>	02/05/2025	<b>Extraction Method:</b>	E625.1
<b>Instrument:</b>	GC17	<b>Analytical Method:</b>	E625.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310729

### QC Summary Report for E625.1

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
Acenaphthene	ND	0.0029	0.0050	-	-	-
Acenaphthylene	ND	0.0018	0.0050	-	-	-
Anthracene	ND	0.0020	0.0050	-	-	-
Benzidine	ND	2.7	5.0	-	-	-
Benzo (a) anthracene	ND	0.020	0.050	-	-	-
Benzo (a) pyrene	ND	0.0050	0.0050	-	-	-
Benzo (b) fluoranthene	ND	0.0053	0.010	-	-	-
Benzo (g,h,i) perylene	ND	0.0039	0.010	-	-	-
Benzo (k) fluoranthene	ND	0.0050	0.010	-	-	-
Benzyl Alcohol	ND	1.9	5.0	-	-	-
Bis (2-chloroethoxy) methane	ND	0.51	1.0	-	-	-
Bis (2-chloroethyl) ether	ND	0.0050	0.0050	-	-	-
Bis (2-chloroisopropyl) ether	ND	0.0049	0.010	-	-	-
Bis (2-ethylhexyl) Adipate	ND	0.79	1.0	-	-	-
Bis (2-ethylhexyl) Phthalate	ND	0.13	0.25	-	-	-
4-Bromophenyl phenyl ether	ND	0.29	1.0	-	-	-
Butylbenzyl Phthalate	ND	0.081	0.25	-	-	-
4-Chloroaniline	ND	0.0020	0.0050	-	-	-
4-Chloro-3-methylphenol	ND	0.59	1.0	-	-	-
2-Chloronaphthalene	ND	0.56	1.0	-	-	-
2-Chlorophenol	ND	0.036	0.050	-	-	-
4-Chlorophenyl phenyl ether	ND	0.49	1.0	-	-	-
Carbazole	ND	0.42	1.0	-	-	-
Chrysene	ND	0.0027	0.0050	-	-	-
Dibenzo (a,h) anthracene	ND	0.0052	0.010	-	-	-
n-Decane	ND	0.69	1.0	-	-	-
Dibenzofuran	ND	0.0014	0.0050	-	-	-
Di-n-butyl phthalate	ND	0.078	0.25	-	-	-
1,2-Dichlorobenzene	ND	0.53	1.0	-	-	-
1,3-Dichlorobenzene	ND	0.59	1.0	-	-	-
1,4-Dichlorobenzene	ND	0.44	1.0	-	-	-
3,3-Dichlorobenzidine	ND	0.0062	0.010	-	-	-
2,4-Dichlorophenol	ND	0.0056	0.010	-	-	-
Diethyl phthalate	ND	0.021	0.050	-	-	-
2,4-Dimethylphenol	ND	0.53	1.0	-	-	-
Dimethyl phthalate	ND	0.0059	0.010	-	-	-
4,6-Dinitro-2-methylphenol	ND	3.7	5.0	-	-	-
2,4-Dinitrophenol	ND	0.68	1.0	-	-	-

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## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/04/2025	<b>BatchID:</b>	310729
<b>Date Analyzed:</b>	02/05/2025	<b>Extraction Method:</b>	E625.1
<b>Instrument:</b>	GC17	<b>Analytical Method:</b>	E625.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310729

### QC Summary Report for E625.1

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
2,4-Dinitrotoluene	ND	0.027	0.050	-	-	-
2,6-Dinitrotoluene	ND	0.030	0.050	-	-	-
Di-n-octyl phthalate	ND	1.2	2.5	-	-	-
1,2-Diphenylhydrazine	ND	0.42	1.0	-	-	-
Fluoranthene	ND	0.0038	0.010	-	-	-
Fluorene	ND	0.0018	0.010	-	-	-
Hexachlorobenzene	ND	0.0017	0.0050	-	-	-
Hexachlorobutadiene	ND	0.0011	0.0050	-	-	-
Hexachlorocyclopentadiene	ND	2.3	5.0	-	-	-
Hexachloroethane	ND	0.0034	0.010	-	-	-
Indeno (1,2,3-cd) pyrene	ND	0.0070	0.010	-	-	-
1-Methylnaphthalene	ND	0.0021	0.0050	-	-	-
Isophorone	ND	0.45	1.0	-	-	-
2-Methylnaphthalene	ND	0.0022	0.0050	-	-	-
2-Methylphenol (o-cresol)	ND	0.63	1.0	-	-	-
3 & 4-Methylphenol (m,p-Cresol)	ND	0.70	1.0	-	-	-
Naphthalene	ND	0.0063	0.010	-	-	-
2-Nitroaniline	ND	3.0	5.0	-	-	-
3-Nitroaniline	ND	3.9	5.0	-	-	-
4-Nitroaniline	ND	2.4	5.0	-	-	-
Nitrobenzene	ND	0.61	1.0	-	-	-
2-Nitrophenol	ND	3.0	5.0	-	-	-
4-Nitrophenol	ND	3.6	5.0	-	-	-
N-Nitrosodimethylamine	ND	3.6	5.0	-	-	-
N-Nitrosodiphenylamine	ND	0.36	1.0	-	-	-
N-Nitrosodi-n-propylamine	ND	0.60	1.0	-	-	-
n-Octadecane	ND	0.54	1.0	-	-	-
Pentachlorophenol	ND	0.16	0.25	-	-	-
Phenanthrene	ND	0.0036	0.0050	-	-	-
Phenol	ND	0.019	0.040	-	-	-
Pyrene	ND	0.0028	0.0050	-	-	-
Pyridine	ND	0.89	1.0	-	-	-
1,2,4-Trichlorobenzene	ND	0.52	1.0	-	-	-
2,4,5-Trichlorophenol	ND	0.0064	0.010	-	-	-
2,4,6-Trichlorophenol	ND	0.0053	0.010	-	-	-

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## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/04/2025	<b>BatchID:</b>	310729
<b>Date Analyzed:</b>	02/05/2025	<b>Extraction Method:</b>	E625.1
<b>Instrument:</b>	GC17	<b>Analytical Method:</b>	E625.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310729

### QC Summary Report for E625.1

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
<b>Surrogate Recovery</b>						
2-Fluorophenol	5.7			5	114	30-130
Phenol-d5	5.5			5	110	20-130
Nitrobenzene-d5	4.7			5	93	60-130
2-Fluorobiphenyl	4.6			5	91	50-130
2,4,6-Tribromophenol	3.2			5	65	60-140
4-Terphenyl-d14	3.2			5	63	40-130

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## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/04/2025	<b>BatchID:</b>	310729
<b>Date Analyzed:</b>	02/05/2025	<b>Extraction Method:</b>	E625.1
<b>Instrument:</b>	GC17	<b>Analytical Method:</b>	E625.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310729

### QC Summary Report for E625.1

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Acenaphthene	0.20	0.23	0.25	81	91	60-132	11.4	25
Acenaphthylene	0.21	0.24	0.25	83	95	54-126	14.1	25
Anthracene	0.19	0.21	0.25	76	85	60-130	11.4	25
Benzidine	14	16	25	56	66	20-130	16.1	25
Benzo (a) anthracene	0.21	0.24	0.25	83	97	60-130	16.0	25
Benzo (a) pyrene	0.15	0.18	0.25	61	73	60-130	17.3	25
Benzo (b) fluoranthene	0.18	0.21	0.25	72	86	60-130	17.5	25
Benzo (g,h,i) perylene	0.17	0.20	0.25	70	79	50-130	12.7	25
Benzo (k) fluoranthene	0.18	0.20	0.25	72	82	60-130	13.1	25
Benzyl Alcohol	20	21	25	78	84	60-130	7.16	25
Bis (2-chloroethoxy) methane	4.6	4.8	5	91	97	65-130	6.08	25
Bis (2-chloroethyl) ether	0.23	0.24	0.25	92	98	60-130	5.68	25
Bis (2-chloroisopropyl) ether	0.25	0.27	0.25	102	108	63-139	5.96	25
Bis (2-ethylhexyl) Adipate	4.1	4.7	5	82	94	60-130	13.7	25
Bis (2-ethylhexyl) Phthalate	0.21	0.24	0.25	84	97	60-130	14.9	25
4-Bromophenyl phenyl ether	3.4	3.8	5	69	77	65-120	10.7	25
Butylbenzyl Phthalate	0.24	0.28	0.25	94	111	60-140	16.6	25
4-Chloroaniline	0.23	0.25	0.25	91	100	60-130	9.19	25
4-Chloro-3-methylphenol	4.7	5.1	5	94	102	65-130	8.43	25
2-Chloronaphthalene	4.0	4.6	5	81	92	65-120	13.0	25
2-Chlorophenol	0.22	0.24	0.25	88	98	60-130	10.1	25
4-Chlorophenyl phenyl ether	4.1	4.6	5	81	92	65-130	12.5	25
Carbazole	3.9	4.4	5	78	88	70-130	11.0	25
Chrysene	0.20	0.23	0.25	80	92	70-130	14.3	25
Dibenzo (a,h) anthracene	0.17	0.19	0.25	66	77	50-130	15.6	25
n-Decane	4.5	4.8	5	90	97	30-130	6.89	25
Dibenzofuran	0.21	0.23	0.25	83	94	65-130	12.0	25
Di-n-butyl phthalate	0.20	0.22	0.25	79	88	60-130	11.7	25
1,2-Dichlorobenzene	4.2	4.4	5	84	88	60-130	4.25	25
1,3-Dichlorobenzene	4.2	4.6	5	85	91	60-130	7.23	25
1,4-Dichlorobenzene	4.1	4.3	5	82	86	60-130	4.39	25
3,3-Dichlorobenzidine	0.18	0.22	0.25	71	90	60-130	22.6	25
2,4-Dichlorophenol	0.22	0.24	0.25	89	97	53-122	8.81	25
Diethyl phthalate	0.24	0.27	0.25	94	109	65-130	14.2	25
2,4-Dimethylphenol	4.7	4.9	5	93	99	60-130	5.60	25
Dimethyl phthalate	0.22	0.25	0.25	88	101	60-130	13.3	25
4,6-Dinitro-2-methylphenol	14	17	25	56,F5	67	60-130	17.5	25
2,4-Dinitrophenol	2.9	3.6	5	58	72	50-130	20.7	25

(Cont.)



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/04/2025	<b>BatchID:</b>	310729
<b>Date Analyzed:</b>	02/05/2025	<b>Extraction Method:</b>	E625.1
<b>Instrument:</b>	GC17	<b>Analytical Method:</b>	E625.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310729

### QC Summary Report for E625.1

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
2,4-Dinitrotoluene	0.21	0.25	0.25	82	99	70-130	18.7	25
2,6-Dinitrotoluene	0.20	0.23	0.25	78	91	68-137	15.2	25
Di-n-octyl phthalate	4.3	5.0	5	85	99	70-130	15.1	25
1,2-Diphenylhydrazine	4.1	4.5	5	82	89	65-130	9.07	25
Fluoranthene	0.19	0.22	0.25	78	88	65-130	12.2	25
Fluorene	0.21	0.24	0.25	85	96	70-120	13.0	25
Hexachlorobenzene	0.17	0.19	0.25	68	74	60-130	9.10	25
Hexachlorobutadiene	0.21	0.22	0.25	84	90	68-130	6.97	25
Hexachlorocyclopentadiene	14	16	25	55	63	50-130	13.9	25
Hexachloroethane	0.22	0.23	0.25	87	92	55-120	5.94	25
Indeno (1,2,3-cd) pyrene	0.17	0.20	0.25	69	80	50-130	15.4	25
1-Methylnaphthalene	0.22	0.24	0.25	88	95	65-130	7.84	25
Isophorone	4.3	4.8	5	87	95	52-130	9.43	25
2-Methylnaphthalene	0.22	0.23	0.25	87	93	60-130	7.08	25
2-Methylphenol (o-cresol)	4.6	4.8	5	93	97	60-130	3.84	25
3 & 4-Methylphenol (m,p-Cresol)	4.5	4.9	5	89	98	60-130	9.15	25
Naphthalene	0.21	0.23	0.25	86	92	70-130	6.68	25
2-Nitroaniline	23	28	25	94	110	65-130	16.2	25
3-Nitroaniline	23	26	25	92	106	70-140	13.6	25
4-Nitroaniline	23	27	25	90	106	70-130	16.4	25
Nitrobenzene	4.5	4.9	5	91	97	60-130	6.70	25
2-Nitrophenol	21	23	25	86	94	70-130	8.84	25
4-Nitrophenol	24	24	25	94	97	30-130	2.29	25
N-Nitrosodimethylamine	23	25	25	93	99	30-130	6.24	25
N-Nitrosodiphenylamine	3.6	4.0	5	72	80	65-130	11.3	25
N-Nitrosodi-n-propylamine	4.6	5.0	5	93	100	59-130	7.21	25
n-Octadecane	4.0	4.4	5	81	88	60-130	8.53	25
Pentachlorophenol	0.88	0.99	1.25	70	79	60-130	11.6	25
Phenanthrene	0.18	0.20	0.25	71	80	65-120	11.5	25
Phenol	1.0	1.1	1	102	110	48-120	7.76	25
Pyrene	0.21	0.24	0.25	82	95	70-120	14.5	25
Pyridine	4.3	4.4	5	85	87	30-130	2.43	25
1,2,4-Trichlorobenzene	4.2	4.5	5	84	89	57-130	5.81	25
2,4,5-Trichlorophenol	0.22	0.26	0.25	90	106	65-130	16.4	25
2,4,6-Trichlorophenol	0.21	0.24	0.25	84	95	69-130	12.6	25

(Cont.)



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/04/2025	<b>BatchID:</b>	310729
<b>Date Analyzed:</b>	02/05/2025	<b>Extraction Method:</b>	E625.1
<b>Instrument:</b>	GC17	<b>Analytical Method:</b>	E625.1
<b>Matrix:</b>	Water	<b>Unit:</b>	µg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310729

### QC Summary Report for E625.1

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
<b>Surrogate Recovery</b>								
2-Fluorophenol	4.9	5.1	5	98	102	30-130	4.40	25
Phenol-d5	5.4	5.6	5	108	112	20-130	3.88	25
Nitrobenzene-d5	5.0	5.2	5	100	105	60-130	4.50	25
2-Fluorobiphenyl	4.4	4.7	5	88	94	50-130	6.38	25
2,4,6-Tribromophenol	4.1	4.3	5	82	87	60-140	5.87	25
4-Terphenyl-d14	2.8	3.1	5	57	61	40-130	7.95	25



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/10/2025	<b>BatchID:</b>	311098
<b>Date Analyzed:</b>	02/10/2025	<b>Extraction Method:</b>	E350.1
<b>Instrument:</b>	WC_SKALAR	<b>Analytical Method:</b>	E350.1
<b>Matrix:</b>	Water	<b>Unit:</b>	mg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-311098

### QC Summary Report for E350.1

Analyte	MB Result	MDL	RL			
Ammonia, total as N	ND	0.089	0.10	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Ammonia, total as N	4.0	4.0	4	100	100	90-110	0.624	10



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/05/2025	<b>BatchID:</b> 310844
<b>Date Analyzed:</b> 02/10/2025	<b>Extraction Method:</b> SM5210B
<b>Instrument:</b> WetChem	<b>Analytical Method:</b> SM5210 B
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-310844

### QC Summary Report for BOD

Analyte	MB Result	MDL	RL			
BOD	ND	2.0	2.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
BOD	210	220	198	104	114	84-115	8.57	16



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/13/2025	<b>BatchID:</b> 311376
<b>Date Analyzed:</b> 02/13/2025	<b>Extraction Method:</b> Kelada-01
<b>Instrument:</b> WC_Skalar3	<b>Analytical Method:</b> Kelada-01
<b>Matrix:</b> Water	<b>Unit:</b> µg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-311376

### QC Summary Report for Kelada-01

Analyte	MB Result	MDL	RL			
Total Cyanide	ND	0.68	1.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Total Cyanide	48	48	50	95	95	90-110	0.147	20



## Quality Control Report

<b>Client:</b>	NRG Energy, LLC	<b>WorkOrder:</b>	2502181
<b>Date Prepared:</b>	02/06/2025	<b>BatchID:</b>	310887
<b>Date Analyzed:</b>	02/06/2025	<b>Extraction Method:</b>	SM5220 D
<b>Instrument:</b>	SPECTROPHOTOMETER2	<b>Analytical Method:</b>	SM5220 D
<b>Matrix:</b>	Water	<b>Unit:</b>	mg/L
<b>Project:</b>	Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b>	MB/LCS/LCSD-310887

### QC Summary Report for COD

Analyte	MB Result	MDL	RL			
COD	ND	4.8	10	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
COD	100	100	100	100	100	90-110	0	20





## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/04/2025	<b>BatchID:</b> 310734
<b>Date Analyzed:</b> 02/05/2025	<b>Extraction Method:</b> E200.8
<b>Instrument:</b> ICP-MS6	<b>Analytical Method:</b> E200.8
<b>Matrix:</b> Water	<b>Unit:</b> µg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-310734

### QC Summary Report for Metals

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
Arsenic	ND	0.077	0.50	-	-	-
Cadmium	ND	0.061	0.50	-	-	-
Chromium	ND	0.33	2.0	-	-	-
Copper	ND	0.63	1.5	-	-	-
Iron	ND	21	50	-	-	-
Lead	ND	0.21	0.50	-	-	-
Mercury	ND	0.026	0.050	-	-	-
Molybdenum	ND	0.18	0.50	-	-	-
Nickel	ND	0.24	0.50	-	-	-
Selenium	ND	0.17	0.50	-	-	-
Silver	ND	0.058	0.50	-	-	-
Zinc	ND	11	20	-	-	-

**Surrogate Recovery**

Terbium	520			500	104	70-130
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Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Arsenic	53	54	50	106	109	85-115	2.26	20
Cadmium	53	53	50	105	107	85-115	1.49	20
Chromium	52	54	50	105	107	85-115	2.28	20
Copper	53	53	50	105	107	85-115	1.81	20
Iron	5200	5300	5000	105	107	85-115	1.87	20
Lead	52	54	50	104	108	85-115	3.08	20
Mercury	1.2	1.3	1.25	98	102	85-115	3.60	20
Molybdenum	51	53	50	102	105	85-115	3.33	20
Nickel	52	53	50	104	107	85-115	3.12	20
Selenium	56	57	50	113	115	85-115	1.71	20
Silver	53	54	50	107	109	85-115	2.04	20
Zinc	540	550	500	108	110	85-115	1.98	20

**Surrogate Recovery**

Terbium	520	520	500	103	105	70-130	1.49	20
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## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/11/2025	<b>BatchID:</b> 311204
<b>Date Analyzed:</b> 02/11/2025	<b>Extraction Method:</b> E420.4
<b>Instrument:</b> WC_SKALAR	<b>Analytical Method:</b> E420.4
<b>Matrix:</b> Water	<b>Unit:</b> µg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-311204

### QC Summary Report for E420.4

Analyte	MB Result	MDL	RL			
Phenolics	ND	1.5	2.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Phenolics	40	40	40	99	99	90-110	0.0834	20



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/07/2025	<b>BatchID:</b> 311062
<b>Date Analyzed:</b> 02/10/2025	<b>Extraction Method:</b> SM2540 C-
<b>Instrument:</b> WetChem	<b>Analytical Method:</b> SM2540 C
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-311062

### QC Summary Report for Total Dissolved Solids

Analyte	MB Result	MDL	RL			
Total Dissolved Solids	ND	10.0	10.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Total Dissolved Solids	976	988	1000	98	99	80-120	1.22	10



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2502181
<b>Date Prepared:</b> 02/05/2025	<b>BatchID:</b> 310862
<b>Date Analyzed:</b> 02/06/2025	<b>Extraction Method:</b> SM2540 D
<b>Instrument:</b> WetChem	<b>Analytical Method:</b> SM2540 D
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Semi Annual 1 of 2; Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-310862

### QC Summary Report for Total Suspended Solids

Analyte	MB Result	MDL	RL			
Total Suspended Solids	ND	1.00	1.00	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Total Suspended Solids	109	102	100	109	102	80-120	6.64	10



1534 Willow Pass Rd  
Pittsburg, CA 94565-1701  
(925) 252-9262

# CHAIN-OF-CUSTODY RECORD

WorkOrder: 2502181

ClientCode: GOA

QuoteID: 244708

- WaterTrax   
  CLIP   
  EDF   
  EQuIS   
  Dry-Weight   
 Email   
 HardCopy   
 ThirdParty   
 J-flag  
 Detection Summary   
 Excel

**Report to:**

David Frandsen  
NRG Energy, LLC  
3201 Wilbur Avenue  
Antioch, CA 94509  
(925) 427-3479    FAX: (925) 779-6679

Email: David.Frandsen@nrg.com  
cc/3rd Party: Ryan.Robinson@nrg.com; joe.moura@nrg.  
PO: 4501937084  
Project: Semi Annual 1 of 2; Marsh Landing  
(Clearway)

**Bill to:**

Accounts Payable  
NRG  
112 Telly Street  
New Roads, LA 70760  
invoices@clearwayenergy.coupa.com

**Requested TATs:**

**5 days;  
7 days;**

Date Received: **02/04/2025**

Date Logged: **02/04/2025**

Lab ID	ClientSampID	Matrix	Collection Date	Hold	Requested Tests (See legend below)													
					1	2	3	4	5	6	7	8	9	10	11	12		
2502181-001	IW-001 ML25-047	Water	2/4/2025 10:00	<input type="checkbox"/>	A													
2502181-001	IW-001 ML25-048	Water	2/4/2025 10:00	<input type="checkbox"/>		B												
2502181-001	IW-001 ML25-049	Water	2/4/2025 10:00	<input type="checkbox"/>										C				
2502181-001	IW-001 ML25-050	Water	2/4/2025 10:00	<input type="checkbox"/>														D
2502181-001	IW-001 ML25-051	Water	2/4/2025 10:00	<input type="checkbox"/>								E						
2502181-001	IW-001 ML25-052	Water	2/4/2025 10:00	<input type="checkbox"/>							F							
2502181-001	IW-001 ML25-053	Water	2/4/2025 10:00	<input type="checkbox"/>				G										
2502181-001	IW-001 ML25-054	Water	2/4/2025 10:00	<input type="checkbox"/>					H									
2502181-001	IW-001 ML25-055	Water	2/4/2025 10:00	<input type="checkbox"/>						I								
2502181-001	IW-001 ML25-056	Water	2/4/2025 10:00	<input type="checkbox"/>													J	
2502181-001	IW-001 ML25-057	Water	2/4/2025 10:00	<input type="checkbox"/>									K					
2502181-001	IW-001 ML25-058	Water	2/4/2025 10:00	<input type="checkbox"/>														
2502181-001	IW-001 ML25-059	Water	2/4/2025 10:00	<input type="checkbox"/>														
2502181-001	IW-001 ML25-060	Water	2/4/2025 10:00	<input type="checkbox"/>														N

**Test Legend:**

1	1664A_SG_W	2	1664A_W	3	608_W	4	624_W
5	624ACR+2CEVE_W	6	625_SCSM_W	7	AMMONIA_W	8	BOD_W
9	CN_W	10	COD_W	11	METALSMS_TTLC_W	12	PHENOLICS_W

Project Manager: Jennifer Lagerbom

Prepared by: Valerie Alfaro

Comments: Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

NOTE: Soil samples are discarded 60 days after receipt unless other arrangements are made (Water samples are 30 days). Hazardous samples will be returned to client or disposed of at client expense.



1534 Willow Pass Rd  
Pittsburg, CA 94565-1701  
(925) 252-9262

# CHAIN-OF-CUSTODY RECORD

WorkOrder: 2502181

ClientCode: GOA

QuoteID: 244708

- WaterTrax   
  CLIP   
  EDF   
  EQuIS   
  Dry-Weight   
 Email   
 HardCopy   
 ThirdParty   
 J-flag  
 Detection Summary   
 Excel

**Report to:**

David Frandsen  
NRG Energy, LLC  
3201 Wilbur Avenue  
Antioch, CA 94509  
(925) 427-3479    FAX: (925) 779-6679

Email: David.Frandsen@nrg.com  
cc/3rd Party: Ryan.Robinson@nrg.com; joe.moura@nrg.  
PO: 4501937084  
Project: Semi Annual 1 of 2; Marsh Landing  
(Clearway)

**Bill to:**

Accounts Payable  
NRG  
112 Telly Street  
New Roads, LA 70760  
invoices@clearwayenergy.coupa.com

**Requested TATs: 5 days;  
7 days;**

*Date Received:* **02/04/2025**

*Date Logged:* **02/04/2025**

Lab ID	ClientSampID	Matrix	Collection Date	Hold	Requested Tests (See legend below)																			
					13	14	15	16	17	18	19	20	21	22	23	24								
2502181-001	IW-001 ML25-047	Water	2/4/2025 10:00	<input type="checkbox"/>	A																			
2502181-001	IW-001 ML25-048	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-049	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-050	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-051	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-052	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-053	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-054	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-055	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-056	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-057	Water	2/4/2025 10:00	<input type="checkbox"/>																				
2502181-001	IW-001 ML25-058	Water	2/4/2025 10:00	<input type="checkbox"/>		L																		
2502181-001	IW-001 ML25-059	Water	2/4/2025 10:00	<input type="checkbox"/>			M																	
2502181-001	IW-001 ML25-060	Water	2/4/2025 10:00	<input type="checkbox"/>																				

**Test Legend:**

13	PRDisposal Fee	14	TDS_W	15	TSS_W	16	
17		18		19		20	
21		22		23		24	

**Project Manager: Jennifer Lagerbom**

**Prepared by: Valerie Alfaro**

**Comments:** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

NOTE: Soil samples are discarded 60 days after receipt unless other arrangements are made (Water samples are 30 days). Hazardous samples will be returned to client or disposed of at client expense.



## WORK ORDER SUMMARY

**Client Name:** NRG ENERGY, LLC  
**Client Contact:** David Frandsen  
**Contact's Email:** David.Frandsen@nrg.com

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)

**Work Order:** 2502181  
**QC Level:** LEVEL 2  
**Date Logged:** 2/4/2025

**Comments** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

WaterTrax     CLIP     EDF     Excel     EQuIS     Email     HardCopy     ThirdParty     J-flag

LabID	ClientSampID	Matrix	Test Name	Cont./Comp.	Bottle & Preservative	U**	Head Space	Dry-Weight	Collection Date & Time	TAT	Test Due Date	Sediment Content	Hold	Sub Out
001A	IW-001 ML25-047	Water	E1664A (SGT- HEM; Non-polar Material)	2	(1LA w/ HCl + 1aVOA w/HCL)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001B	IW-001 ML25-048	Water	E1664A (HEM; Oil & Grease w/o S.G. Clean-Up)	2	(1LA w/ HCl + 1aVOA w/HCL)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001C	IW-001 ML25-049	Water	Kelada-01 (Cyanide, Total)	1	250mL aHDPE w/ NaOH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001D	IW-001 ML25-050	Water	E420.4 (Phenolics)	1	250mL aG w/ H2SO4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001E	IW-001 ML25-051	Water	E350.1 (Ammonia)	1	250mL aG w/ H2SO4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>

**NOTES:** \* STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).

- ISM prep requires 5 to 10 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 6 to 11 days from sample submission). Due date listed on WO summary will not accurately reflect the time needed for sample preparation.

- Organic extracts are held for 40 days before disposal; Inorganic extract are held for 30 days.

- MAI assumes that all material present in the provided sampling container is considered part of the sample - MAI does not exclude any material from the sample prior to sample preparation unless requested in writing by the client.

U\*\* = An unpreserved container was received for a method that suggests a preservation in order to extend hold time for analysis.



## WORK ORDER SUMMARY

**Client Name:** NRG ENERGY, LLC  
**Client Contact:** David Frandsen  
**Contact's Email:** David.Frandsen@nrg.com

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)

**Work Order:** 2502181  
**QC Level:** LEVEL 2  
**Date Logged:** 2/4/2025

**Comments:** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

WaterTrax     CLIP     EDF     Excel     EQulS     Email     HardCopy     ThirdParty     J-flag

LabID	ClientSampID	Matrix	Test Name	Cont./Comp.	Bottle & Preservative	U**	Head Space	Dry-Weight	Collection Date & Time	TAT	Test Due Date	Sediment Content	Hold	Sub Out
001F	IW-001 ML25-052	Water	E625.1 (SVOCs) <1,2,4-Trichlorobenzene, 1,2-Dichlorobenzene, 1,2-Diphenylhydrazine, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 2,4,6-Trichlorophenol, 2,4-Dichlorophenol, 2,4-Dimethylphenol, 2,4-Dinitrophenol, 2,4-Dinitrotoluene, 2,6-Dinitrotoluene, 2-Chloronaphthalene, 2-Chlorophenol, 2-Nitrophenol, 3,3-Dichlorobenzidine, 4-Bromophenyl Phenyl Ether, 4-Chloro-3-methylphenol, 4-Chlorophenyl Phenyl Ether, 4-Nitrophenol, Acenaphthene, Acenaphthylene, Anthracene, Benzidine, Benzo (a) anthracene, Benzo (a) pyrene, Benzo (b) fluoranthene, Benzo (g,h,i) perylene, Benzo (k) fluoranthene, Bis (2-chloroethoxy) Methane, Bis (2-chloroethyl) Ether, Bis (2-chloroisopropyl) Ether, Bis (2-	1	1LA Narrow Mouth, Unpres	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>

**NOTES:** \* STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).

- ISM prep requires 5 to 10 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 6 to 11 days from sample submission). Due date listed on WO summary will not accurately reflect the time needed for sample preparation.
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U\*\* = An unpreserved container was received for a method that suggests a preservation in order to extend hold time for analysis.





### WORK ORDER SUMMARY

**Client Name:** NRG ENERGY, LLC  
**Client Contact:** David Frandsen  
**Contact's Email:** David.Frandsen@nrg.com

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)  
**Comments:** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

**Work Order:** 2502181  
**QC Level:** LEVEL 2  
**Date Logged:** 2/4/2025

WaterTrax     CLIP     EDF     Excel     EQulS     Email     HardCopy     ThirdParty     J-flag

LabID	ClientSampID	Matrix	Test Name	Cont./Comp.	Bottle & Preservative	U**	Head Space	Dry-Weight	Collection Date & Time	TAT	Test Due Date	Sediment Content	Hold	Sub Out
			ethylhexyl) Phthalate, Butylbenzyl Phthalate, Chrysene, Dibenzo (a,h) anthracene, Diethyl Phthalate, Dimethyl Phthalate, Di-n-butyl Phthalate, Di-n-octyl Phthalate, Fluoranthene, Fluorene, Hexachlorobenzene, Hexachlorobutadiene, Hexachlorocyclopentadiene, Hexachloroethane, Indeno (1,2,3-cd) pyrene, Isophorone, Naphthalene, Nitrobenzene, N-Nitrosodimethylamine, N-Nitrosodi-n-propylamine, N-Nitrosodiphenylamine, Pentachlorophenol, Phenanthrene, Phenol, Pyrene>											

**NOTES:** \* STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).

- ISM prep requires 5 to 10 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 6 to 11 days from sample submission). Due date listed on WO summary will not accurately reflect the time needed for sample preparation.
- Organic extracts are held for 40 days before disposal; Inorganic extract are held for 30 days.
- MAI assumes that all material present in the provided sampling container is considered part of the sample - MAI does not exclude any material from the sample prior to sample preparation unless requested in writing by the client.

U\*\* = An unpreserved container was received for a method that suggests a preservation in order to extend hold time for analysis.



### WORK ORDER SUMMARY

**Client Name:** NRG ENERGY, LLC  
**Client Contact:** David Frandsen  
**Contact's Email:** David.Frandsen@nrg.com

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)  
**Comments:** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

**Work Order:** 2502181  
**QC Level:** LEVEL 2  
**Date Logged:** 2/4/2025

WaterTrax     CLIP     EDF     Excel     EQulS     Email     HardCopy     ThirdParty     J-flag

LabID	ClientSampID	Matrix	Test Name	Cont./Comp.	Bottle & Preservative	U**	Head Space	Dry-Weight	Collection Date & Time	TAT	Test Due Date	Sediment Content	Hold	Sub Out
001G	IW-001 ML25-053	Water	E608.3 (OC Pesticides+PCBs w/ Florisil Clean-up) <a-BHC_1, a-Chlordane_1, Aldrin_1, Aroclor1016_1, Aroclor1221_1, Aroclor1232_1, Aroclor1242_1, Aroclor1248_1, Aroclor1254_1, Aroclor1260_1, b-BHC_1, Chlordane (Technical)_1, d-BHC_1, Dieldrin_1, Endosulfan I_1, Endosulfan II_1, Endosulfan sulfate_1, Endrin aldehyde_1, Endrin_1, g-BHC_1, g-Chlordane_1, Heptachlor epoxide_1, Heptachlor_1, p,p-DDD_1, p,p-DDE_1, p,p-DDT_1, PCBs, total_1, Toxaphene_1>	1	1LA Narrow Mouth, Unpres	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>

**NOTES:** \* STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).

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WORK ORDER SUMMARY

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Client Contact: David Frandsen
Contact's Email: David.Frandsen@nrg.com

Project: Semi Annual 1 of 2; Marsh Landing (Clearway)

Work Order: 2502181
QC Level: LEVEL 2
Date Logged: 2/4/2025

Comments Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

WaterTrax CLIP EDF Excel EQulS Email HardCopy ThirdParty J-flag

Table with columns: LabID, ClientSampID, Matrix, Test Name, Cont./Comp., Bottle & Preservative, U\*\*, Head Space, Dry-Weight, Collection Date & Time, TAT, Test Due Date, Sediment Content, Hold, Sub Out. Contains two rows of test data.

NOTES: \* STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).
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### WORK ORDER SUMMARY

**Client Name:** NRG ENERGY, LLC  
**Client Contact:** David Frandsen  
**Contact's Email:** David.Frandsen@nrg.com

**Project:** Semi Annual 1 of 2; Marsh Landing (Clearway)

**Work Order:** 2502181  
**QC Level:** LEVEL 2  
**Date Logged:** 2/4/2025

**Comments** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

WaterTrax     CLIP     EDF     Excel     EQulS     Email     HardCopy     ThirdParty     J-flag

LabID	ClientSampID	Matrix	Test Name	Cont./Comp.	Bottle & Preservative	U**	Head Space	Dry-Weight	Collection Date & Time	TAT	Test Due Date	Sediment Content	Hold	Sub Out
001J	IW-001 ML25-056	Water	SM5220D (COD)	2	aVOA w/ H2SO4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001K	IW-001 ML25-057	Water	SM5210B (BOD)	1	500mL HDPE, unprsv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	7 days	2/13/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001L	IW-001 ML25-058	Water	SM2540C (TDS)	1	500mL HDPE, unprsv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001M	IW-001 ML25-059	Water	SM2540D (TSS)	1	1L HDPE, unprsv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>
001N	IW-001 ML25-060	Water	E200.8 (Metals) <Arsenic, Cadmium, Chromium, Copper, Iron, Lead, Mercury, Molybdenum, Nickel, Selenium, Silver, Zinc>	1	250mL HDPE w/ HNO3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2/4/2025 10:00	5 days	2/11/2025	Trace	<input type="checkbox"/>	<input type="checkbox"/>

**NOTES:** \* STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).

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## Sample Receipt Checklist

Client Name: NRG Energy, LLC  
 Project: Semi Annual 1 of 2; Marsh Landing (Clearway)  
 WorkOrder No: 2502181 Matrix: Water  
 Carrier: Client Drop-In

Date and Time Received: 2/4/2025 15:27  
 Date Logged: 2/4/2025  
 Received by: Valerie Alfaro  
 Logged by: Valerie Alfaro

### Chain of Custody (COC) Information

Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sample IDs noted by Client on COC?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Date and Time of collection noted by Client on COC?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sampler's name noted on COC?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
COC agrees with Quote?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

### Sample Receipt Information

Custody seals intact on shipping container/cooler?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Custody seals intact on sample bottles?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Samples in proper containers/bottles?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

### Sample Preservation and Hold Time (HT) Information

All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Samples Received on Ice?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

(Ice Type: WET ICE )

Sample/Temp Blank temperature	Temp: 4.1°C	NA <input type="checkbox"/>	
ZHS conditional analyses: VOA meets zero headspace requirement (VOCs, TPHg/BTEX, RSK)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Sample labels checked for correct preservation?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
pH acceptable upon receipt (Metal: <2)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

pH Lot#: HC446507  
 Lot Expiration: 1/31/2028

### UCMR Samples:

pH tested and acceptable upon receipt (200.7: ≤2; 533: 6 - 8; 537.1: 6 - 8)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Free Chlorine tested and acceptable upon receipt (<0.1mg/L) [not applicable to 200.7]?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

Comments:



## Industrial User Report Checklist And Certification Statement Form

Attn: Environmental Compliance Specialist	Miracle Odurukwe		
Environmental Specialist Phone	(925) 756-1929	Fax	(925) 756-1961
Industrial User Facility Name	Marsh Landing LLC		
Duly Authorized Representative Name	Joe Moura		
Duly Authorized Representative Phone	925-779-6685		

This Industrial User Report Checklist and Certification Statement Form shall be submitted with all Self-Monitoring Reports (SMRs), as specified by the Wastewater Discharge Permit issued by Delta Diablo, hereinafter referred to as the District. When submitting Self-Monitoring Reports, check all that are applicable.

RECEIVED

JUL 11 2025

### Self-Monitoring Reports (SMRs) (Required)

Flow Discharge Summary (Review Discharge Permit.)

Calibration of Effluent Flow Meters; if applicable.

DELTA DIABLO

03:38pm HL

Monitoring Results – all required tests completed, results reviewed, results included

Quality Assurance/Quality Control (QA/QC) and Chain-of-Custody (COC) (Review Discharge Permit):

pH (field-grab) (shall be analyzed within 15 minutes of sample collection).

Results, collection time, analysis time and Technician's Initials shall be reported in the comments section of the respective COC. The pH meter shall be accurate and reproducible to 0.1 pH unit with a range of 0 to 14 and equipped with a temperature-compensation adjustment (Standard methods).

Cyanide samples were tested for oxidizers and preserved with Sodium Hydroxide (NaOH).

This shall be reported in the comments section on the respective COC, if applicable.

Selenium lab analysis by EPA Method 200.8 by Reaction Mode: if applicable.

Total Phenolics lab analysis by EPA Method 420.4: if applicable.

All sample analysis for regulatory compliance reporting shall be completed by an ELAP certified Laboratory.

Certification Statement included (see attached)

Other requested data Sanitary Flow Meter Calibration Record





## Industrial User Report Checklist And Certification Statement Form

### Violations (if applicable)

- All wastewater discharge violations are reported during this period:
- The District was contacted within 24- hours of becoming aware of the violation.  
Date: \_\_\_\_\_
- A follow-up resample was completed. Date: \_\_\_\_\_
- Corrective actions implemented to resolve violation (Please explain in writing)
- Significant Non-Compliance (SNC) Status Review  
Please circle the review period \*: **January – June** and **July -December**.

The SIU shall conduct a SNC review for the previous completed period \* prior to the Self-monitoring Report (SMR) due date. Examples: A October SMR due date, the SNC review period is **January – June** or an April SMR due date, the SNC review period is **July – December**.

The SNC definition can be found in 40 CFR 403.8.

- a) Chronic SNC= >66% of a regulated parameter in violation during six-month Period \*.
- b) Technical Review Criteria (TRC) SNC = >33% of a regulated pollutant during a six-month period\* equals or exceeds the product of the daily maximum limit or the average limit multiplied by the applicable TRC factor (1.4 for BOD, TSS and Oil/Grease and 1.2 for all other regulated pollutants except pH).

Is the SIU in SNC (as defined in a and/or b) for this period\*? Yes , No ; If yes, for what period? \_\_\_\_\_ . Please report the SNC status to the District in the SMR and include corrective actions to resolve the SNC classification.

Other violations – i.e., reporting, spills to sewer, or prohibited discharges

### All violations will be discussed in the cover letter of the Self-Monitoring Report.

Significant Changes

Anticipated changes that may alter the nature, quality, or volume of the wastewater discharged. Planned changes shall be submitted at least 90 days prior to implementation, and shall include a detailed description of this change.



## Industrial User Report Checklist And Certification Statement Form

### Certification Statement

Industrial User Facility Name	Marsh Landing LLC
Industrial User Facility Address	3201-C Wilbur Avenue, Antioch, CA 94509
Duly Authorized Representative Phone	925-779-6685
Indicate Period Covered by This Report	April 1-June 30, 2025

#### Certification Statement:

**I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 403.6).**

Duly Authorized Representative Signature	
Duly Authorized Representative Print	Joe Moura
Date	



**Marsh Landing LLC**  
Marsh Landing Generating Station  
3201-C Wilbur Avenue (shipping)  
PO Box 1687 (mailing)  
Antioch, CA 94509

July 11, 2025

Mr. Jason Yun  
Delta Diablo  
2500 Pittsburg-Antioch Highway  
Antioch, CA 94509-1373

**Subject: 2025 Second Quarterly (April 1-June 30) Self-Monitoring Report  
Marsh Landing LLC, Marsh Landing Generating Station,  
Industrial Wastewater Discharge Permit 0311963-S**

This letter documents the transmittal of the 2025 Second Quarterly Self-Monitoring Report (SMR).

Compliance Statement (choose one):

- There were no violations of waste discharge requirements during the reporting period.
- The following violation(s) of waste discharge requirements occurred during the reporting period, as described below:

**Discussion:**

This report is the SMR filed for the station and covers the period from April 1 through June 30, 2025. This report includes monthly flow data and quarterly analytical data required to be collected in 2025. Semiannual analytical data was submitted with the first quarterly report for 2024. Data are summarized in the attached tables.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

If you have any questions, please contact Mr. David Frandsen, Environmental Specialist at [David.Frandsen@nrg.com](mailto:David.Frandsen@nrg.com) or call 925.779.6695.

Sincerely,



**Joe Moura**  
Plant Manager  
Marsh Landing LLC  
Marsh Landing Generating Station

*Attachments*

Table 1:	Quarterly Analytical Results for Combined Wastewater (IW-001)
Table 2:	April 2025 Monthly Flow Data
Table 3:	May 2025 Monthly Flow Data
Table 4:	June 2025 Monthly Flow Data

Attachment 1:	pH COC
Attachment 2:	Analytical Reports

Table 1  
Quarterly Results for Combined Wastewater (IW-001)

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue
	Antioch CA 94509

Sample Station Location	FAC Combined
Sample Station Description	Local Limits FAC Combined Wastewater
Reporting Period	April - June 2025
Report Type	Quarterly

Constituent	Sample Date	Permit Limit	Result	Units
Field pH	5/14/2025	6-10	7.5	S.U.
BOD	5/14/2025	-	17	mg/L
COD	5/14/2025	-	83	mg/L
Arsenic	5/14/2025	0.15	0.00061	mg/L
Cadmium	5/14/2025	0.1	0.000062 J	mg/L
Chromium	5/14/2025	0.5	0.0013	mg/L
Copper	5/14/2025	0.5	0.045	mg/L
Iron	5/14/2025	-	0.40	mg/L
Lead	5/14/2025	0.5	0.00029 J	mg/L
Mercury	5/14/2025	0.003	ND	mg/L
Molybdenum	5/14/2025	-	0.0013	mg/L
Nickel	5/14/2025	0.5	0.006	mg/L
Selenium	5/14/2025	0.25	0.00033 J	mg/L
Silver	5/14/2025	0.2	ND	mg/L
Zinc	5/14/2025	1.0	0.12	mg/L
TDS	5/14/2025	-	162	mg/L
TSS	5/14/2025	-	24.40	mg/L

J = The reported concentration is an estimated value.

mg/L = Milligrams per liter

ND = Not detected at or above the laboratory Method Detection Limit or Reporting Limit.

S.U. = Standard units

Table 2  
 Monthly Flow Data

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue Antioch CA 94509
Sample Station Location	IW-001
Sample Station Description	Flow Monitoring Structure
Reporting Period	April-25
Report Type	Quarterly
Constituent	Flow
Sample Type	Continuous, measured by flow meter
Sample Date	4/1/2025 - 4/30/2025
Permit Limits (s.u.)	NTE 30,240 gpd. NTE 21 gpm +10% (23.1 gpm) for 15 consecutive minutes or 30 minutes in a 24-hour period

Day	Total Flow (gpd)	Instantaneous Max (gpm)	Minutes per Day of Flow exceeding 23.1 gpm
1	486	12.33	
2	3,638	19.29	
3	0	0.00	
4	0	0.00	
5	0	0.00	
6	0	0.00	
7	0	0.00	
8	482	13.87	
9	0	0.00	
10	0	0.00	
11	12,874	27.53	1
12	0	0.00	
13	0	0.00	
14	4,915	19.26	
15	0	0.00	
16	0	0.00	
17	0	0.00	
18	423	14.89	
19	0	0.00	
20	0	0.00	
21	0	0.00	
22	0	0.00	
23	437	10.38	
24	0	0.00	
25	11,257	20.57	
26	3,313	19.07	
27	0	0.00	
28	0	0.00	
29	0	0.00	
30	10,678	20.59	

Total Monthly Flow (gal)	48,503	Did flow exceed limits?	NO
Daily Max Flow (gpd)	12,874	Flow above daily max (30,240 gpd)?	NO
Average Monthly Flow (gpd)	1,617		

Table 3  
 Monthly Flow Data

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue
	Antioch CA 94509
Sample Station Location	IW-001
Sample Station Description	Flow Monitoring Structure
Reporting Period	May-25
Report Type	Quarterly
Constituent	Flow
Sample Type	Continuous, measured by flow meter
Sample Date	5/1/2025 - 5/31/2025
Permit Limits (s.u.)	NTE 30,240 gpd. NTE 21 gpm +10% (23.1 gpm) for 15 consecutive minutes or 30 minutes in a 24-hour period

Day	Total Flow (gpd)	Instantaneous Max (gpm)	Minutes per Day of Flow exceeding 23.1 gpm
1	449	13.59	
2	0	0.00	
3	0	0.00	
4	0	0.00	
5	0	0.00	
6	0	0.00	
7	508	11.39	
8	0	0.00	
9	0	0.00	
10	0	0.00	
11	0	0.00	
12	0	0.00	
13	14,237	21.04	
14	18,832	19.09	
15	0	0.00	
16	0	0.00	
17	0	0.00	
18	0	0.00	
19	454	15.67	
20	12,424	20.93	
21	0	0.00	
22	0	0.00	
23	0	0.00	
24	456	16.06	
25	0	0.00	
26	0	0.00	
27	0	0.00	
28	5,330	20.68	
29	10,126	19.22	
30	0	0.00	
31	0	0.00	

Total Monthly Flow (gal)	62,817	Did flow exceed limits?	NO
Daily Max Flow (gpd)	18,832	Flow above daily max (30,240 gpd)?	NO
Average Monthly Flow (gpd)	2,026		

Table 4  
 Monthly Flow Data

Industrial User Name	Marsh Landing LLC
Location	Marsh Landing Generating Station
Permit Number	0311963-S
SIC	4911
Address	3201-C Wilbur Avenue Antioch CA 94509
Sample Station Location	IW-001
Sample Station Description	Flow Monitoring Structure
Reporting Period	June-25
Report Type	Quarterly
Constituent	Flow
Sample Type	Continuous, measured by flow meter
Sample Date	6/1/2025 - 6/30/2025
Permit Limits (s.u.)	NTE 30,240 gpd. NTE 21 gpm +10% (23.1 gpm) for 15 consecutive minutes or 30 minutes in a 24-hour period

Day	Total Flow (gpd)	Instantaneous Max (gpm)	Minutes per Day of Flow exceeding 23.1 gpm
1	0	0.00	
2	576	23.16	1
3	0	0.00	
4	0	0.00	
5	0	0.00	
6	4,727	20.69	
7	7,799	19.10	
8	0	0.00	
9	6,230	20.24	
10	3,830	19.09	
11	0	0.00	
12	476	15.28	
13	2,835	20.81	
14	6,513	19.46	
15	0	0.00	
16	0	0.00	
17	0	0.00	
18	4,059	19.33	
19	13,655	19.22	
20	535	15.46	
21	0	0.00	
22	0	0.00	
23	0	0.00	
24	0	0.00	
25	387	11.15	
26	0	0.00	
27	0	0.00	
28	0	0.00	
29	0	0.00	
30	0	0.00	

Total Monthly Flow (gal)	51,621	Did flow exceed limits?	NO
Daily Max Flow (gpd)	13,655	Flow above daily max (30,240 gpd)?	NO
Average Monthly Flow (gpd)	1,721		



Marsh Landing Generating Station

Reported to:  
Environmental Engineer

# NPDES Monthly Analytical Report

Sample Point	Sample Number	Sample Date	Sample Collection Time	Date Analyzed	pH Analysis Time	Sample Medium	Sample Type (Grab)	pH
IW-001	ML25-072	5/14/25	0930	5/14/25	0930	Wastewater	Grab	7.5
							<i>Method:</i>	SM 4500-H+B
							<i>Unit:</i>	standard
							<i>Reporting Limit:</i>	0.18
							<i>Method Detection Limit:</i>	0.06

SM = Standard Method; ppm = parts per million; mg/L = milligrams per liter; N/A = not applicable

Environmental Engineer David Frandsen

Signature: David Frandsen

Date: May 15, 2025

Sampling Technologist: Ryan Robinson

Signature: [Signature]

Date: 5/14/2025



# McC Campbell Analytical, Inc.

"When Quality Counts"

## Analytical Report

**WorkOrder:** 2505905

**Report Created for:** NRG Energy, LLC  
3201 Wilbur Avenue  
Antioch, CA 94509

**Project Contact:** David Frandsen  
**Project P.O.:** 4501937084  
**Project:** Marsh Landing (Clearway)

**Project Location:** Antioch, CA  
**Project Received:** 05/14/2025

Analytical Report reviewed & approved for release on 05/21/2025 by:

Jennifer Lagerbom  
Project Manager

*The report shall not be reproduced except in full, without the written approval of the laboratory. The analytical results relate only to the items tested. Results reported conform to the most current regulatory standards, where applicable, unless otherwise stated in a case narrative.*





## Glossary of Terms & Qualifier Definitions

**Client:** NRG Energy, LLC

**WorkOrder:** 2505905

**Project:** Marsh Landing (Clearway)

### Glossary Abbreviation

%D	Serial Dilution Percent Difference
95% Interval	95% Confident Interval
CCV	Continuing Calibration Verification.
CCV REC (%)	% recovery of Continuing Calibration Verification.
CPT	Consumer Product Testing not NELAP Accredited
DF	Dilution Factor
DI WET	(DISTLC) Waste Extraction Test using DI water
DISS	Dissolved (direct analysis of 0.45 µm filtered and acidified water sample)
DLT	Dilution Test (Serial Dilution)
DUP	Duplicate
EDL	Estimated Detection Limit
ERS	External reference sample. Second source calibration verification.
ITEF	International Toxicity Equivalence Factor
LCS	Laboratory Control Sample
LCS2	Second LCS for the batch. Spike level is lower than that for the first LCS; applicable to method 1633.
LQL	Lowest Quantitation Level
MB	Method Blank
MB IS/SS % Rec	% Recovery of Internal Standard or Surrogate in Method Blank, if applicable
MB SS % Rec	% Recovery of Surrogate in Method Blank, if applicable
MDL	Method Detection Limit <sup>1</sup>
ML	Minimum Level of Quantitation
MS	Matrix Spike
MSD	Matrix Spike Duplicate
NA	Not Applicable
ND	Not detected at or above the indicated MDL or RL
NR	Data Not Reported due to matrix interference or insufficient sample amount.
PDS	Post Digestion Spike
PF	Prep Factor
RD	Relative Difference
RL	Reporting Limit <sup>2</sup>
RPD	Relative Percent Difference
RRT	Relative Retention Time
RSD	Relative Standard Deviation
SNR	Surrogate is diluted out of the calibration range

<sup>1</sup> MDL is the minimum measured concentration of a substance that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results. Definition and Procedure for the Determination of the Method Detection Limit, Revision 2, 40CFR, Part 136, Appendix B, EPA 821-R-16-006, December 2016. Values are based upon our default extraction volume/amount and are subject to change.

<sup>2</sup> RL is the lowest level that can be reliably determined within specified limits of precision and accuracy during routine laboratory operating conditions. (The RL cannot be lower than the lowest calibration standard used in the initial calibration of the instrument and must be greater than the MDL.) Values are based upon our default extraction volume/amount and are subject to change.



## Glossary of Terms & Qualifier Definitions

**Client:** NRG Energy, LLC

**WorkOrder:** 2505905

**Project:** Marsh Landing (Clearway)

SPK Val	Spike Value
SPKRef Val	Spike Reference Value
SPLP	Synthetic Precipitation Leachate Procedure
ST	Sorbent Tube
TCLP	Toxicity Characteristic Leachate Procedure
TEQ	Toxicity Equivalents
TNTC	"Too Numerous to Count;" greater than 250 colonies observed on the plate.
TZA	TimeZone Net Adjustment for sample collected outside of MAI's Coordinated Universal Time (UTC). (Adjustment for Daylight Saving is not accounted.)
WET (STLC)	Waste Extraction Test (Soluble Threshold Limit Concentration)

### **Analytical Qualifiers**

J Result is less than the RL/ML but greater than the MDL. The reported concentration is an estimated value.



## Analytical Report

**Client:** NRG Energy, LLC  
**Date Received:** 05/14/2025 11:18  
**Date Prepared:** 05/14/2025  
**Project:** Marsh Landing (Clearway)

**WorkOrder:** 2505905  
**Extraction Method:** SM5210 B  
**Analytical Method:** SM5210 B  
**Unit:** mg/L

### Biochemical Oxygen Demand (BOD)

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001, ML25-62 C-24	2505905-001B	Water	05/14/2025 09:30	WetChem	317334

<u>Analytes</u>	<u>Result</u>	<u>MDL</u>	<u>RL</u>	<u>DF</u>	<u>Date Analyzed</u>
BOD	17	8.0	8.0	4	05/19/2025 12:15

Analyst(s): JME



## Analytical Report

**Client:** NRG Energy, LLC  
**Date Received:** 05/14/2025 11:18  
**Date Prepared:** 05/15/2025  
**Project:** Marsh Landing (Clearway)

**WorkOrder:** 2505905  
**Extraction Method:** SM5220 D  
**Analytical Method:** SM5220 D  
**Unit:** mg/L

### Chemical Oxygen Demand (COD) as mg O<sub>2</sub> /L

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001, ML25-61 C-24	2505905-001A	Water	05/14/2025 09:30	SPECTROPHOTOMETER2	317402

Analytes	Result	MDL	RL	DF	Date Analyzed
COD	83	4.8	10	1	05/15/2025 19:06

Analyst(s): AHE



## Analytical Report

**Client:** NRG Energy, LLC  
**Date Received:** 05/14/2025 11:18  
**Date Prepared:** 05/14/2025  
**Project:** Marsh Landing (Clearway)

**WorkOrder:** 2505905  
**Extraction Method:** E200.8  
**Analytical Method:** E200.8  
**Unit:** mg/L

### Metals

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001, ML25-65 C-24	2505905-001E	Water	05/14/2025 09:30	ICP-MS4 167SMPL.d	317286

Analytes	Result	Qualifiers	MDL	RL	DF	Date Analyzed
Arsenic	0.00061		0.000077	0.00050	1	05/15/2025 14:23
Cadmium	0.000062	J	0.000061	0.00050	1	05/15/2025 14:23
Chromium	0.0013	J	0.00033	0.0020	1	05/15/2025 14:23
Copper	0.045		0.00063	0.0015	1	05/15/2025 14:23
Iron	0.40		0.021	0.050	1	05/15/2025 14:23
Lead	0.00029	J	0.00021	0.00050	1	05/15/2025 14:23
Mercury	ND		0.000026	0.000050	1	05/15/2025 14:23
Molybdenum	0.0013		0.00018	0.00050	1	05/15/2025 14:23
Nickel	0.0055		0.00024	0.00050	1	05/15/2025 14:23
Selenium	0.00033	J	0.00017	0.00050	1	05/15/2025 14:23
Silver	ND		0.000058	0.00050	1	05/15/2025 14:23
Zinc	0.12		0.011	0.020	1	05/15/2025 14:23

Surrogates	REC (%)	Limits	DF	Date Analyzed
Terbium	108	70-130	1	05/15/2025 14:23

Analyst(s): AL



# Analytical Report

**Client:** NRG Energy, LLC  
**Date Received:** 05/14/2025 11:18  
**Date Prepared:** 05/15/2025  
**Project:** Marsh Landing (Clearway)

**WorkOrder:** 2505905  
**Extraction Method:** SM2540 C  
**Analytical Method:** SM2540 C  
**Unit:** mg/L

## Total Dissolved Solids

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001, ML25-63 C-24	2505905-001C	Water	05/14/2025 09:30	WetChem	317452

Analytes	Result	MDL	RL	DF	Date Analyzed
Total Dissolved Solids	162	10.0	10.0	1	05/16/2025 12:30

Analyst(s): LSE





# Analytical Report

**Client:** NRG Energy, LLC  
**Date Received:** 05/14/2025 11:18  
**Date Prepared:** 05/15/2025  
**Project:** Marsh Landing (Clearway)

**WorkOrder:** 2505905  
**Extraction Method:** SM2540 D  
**Analytical Method:** SM2540 D  
**Unit:** mg/L

## Total Suspended Solids

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
IW-001, ML25-64 C-24	2505905-001D	Water	05/14/2025 09:30	WetChem	317414

Analytes	Result	MDL	RL	DF	Date Analyzed
Total Suspended Solids	24.4	2.00	2.00	2	05/15/2025 13:02

Analyst(s): ACH



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2505905
<b>Date Prepared:</b> 05/14/2025	<b>BatchID:</b> 317334
<b>Date Analyzed:</b> 05/19/2025	<b>Extraction Method:</b> SM5210 B
<b>Instrument:</b> WetChem	<b>Analytical Method:</b> SM5210 B
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-317334

### QC Summary Report for BOD

Analyte	MB Result	MDL	RL			
BOD	ND	2.0	2.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
BOD	210	200	198	108	98	84-115	8.82	16



## Quality Control Report

**Client:** NRG Energy, LLC  
**Date Prepared:** 05/15/2025  
**Date Analyzed:** 05/15/2025  
**Instrument:** SPECTROPHOTOMETER2  
**Matrix:** Water  
**Project:** Marsh Landing (Clearway)

**WorkOrder:** 2505905  
**BatchID:** 317402  
**Extraction Method:** SM5220 D  
**Analytical Method:** SM5220 D  
**Unit:** mg/L  
**Sample ID:** MB/LCS/LCSD-317402  
 2505905-001AMS/MSD

### QC Summary Report for COD

Analyte	MB Result	MDL	RL			
COD	ND	4.8	10	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
COD	100	100	100	102	105	90-110	2.07	20

Analyte	MS DF	MS Result	MSD Result	SPK Val	SPKRef Val	MS %REC	MSD %REC	MS/MSD Limits	RPD	RPD Limit
COD	1	180	180	100	83.11	92	98	80-120	3.60	20



## Quality Control Report

**Client:** NRG Energy, LLC  
**Date Prepared:** 05/14/2025  
**Date Analyzed:** 05/15/2025  
**Instrument:** ICP-MS4  
**Matrix:** Water  
**Project:** Marsh Landing (Clearway)

**WorkOrder:** 2505905  
**BatchID:** 317286  
**Extraction Method:** E200.8  
**Analytical Method:** E200.8  
**Unit:** µg/L  
**Sample ID:** MB/LCS/LCSD-317286

### QC Summary Report for Metals

Analyte	MB Result	MDL	RL	SPK Val	MB IS/SS %REC	MB IS/SS Limits
Arsenic	ND	0.077	0.50	-	-	-
Cadmium	ND	0.061	0.50	-	-	-
Chromium	ND	0.33	2.0	-	-	-
Copper	ND	0.63	1.5	-	-	-
Iron	ND	21	50	-	-	-
Lead	ND	0.21	0.50	-	-	-
Mercury	ND	0.026	0.050	-	-	-
Molybdenum	ND	0.18	0.50	-	-	-
Nickel	ND	0.24	0.50	-	-	-
Selenium	ND	0.17	0.50	-	-	-
Silver	ND	0.058	0.50	-	-	-
Zinc	ND	11	20	-	-	-

**Surrogate Recovery**

Terbium	530			500	105	70-130
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Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Arsenic	54	54	50	107	108	85-115	0.510	20
Cadmium	53	54	50	106	108	85-115	1.57	20
Chromium	53	53	50	105	107	85-115	1.36	20
Copper	54	55	50	109	109	85-115	0.200	20
Iron	5300	5300	5000	105	107	85-115	1.35	20
Lead	52	53	50	104	106	85-115	1.73	20
Mercury	1.3	1.3	1.25	102	103	85-115	0.545	20
Molybdenum	50	51	50	101	101	85-115	0.457	20
Nickel	55	53	50	110	106	85-115	3.31	20
Selenium	55	55	50	109	111	85-115	1.41	20
Silver	53	53	50	106	107	85-115	0.944	20
Zinc	540	550	500	109	110	85-115	1.27	20

**Surrogate Recovery**

Terbium	530	530	500	105	106	70-130	1.11	20
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## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2505905
<b>Date Prepared:</b> 05/15/2025	<b>BatchID:</b> 317452
<b>Date Analyzed:</b> 05/16/2025	<b>Extraction Method:</b> SM2540 C
<b>Instrument:</b> WetChem	<b>Analytical Method:</b> SM2540 C
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-317452

### QC Summary Report for Total Dissolved Solids

Analyte	MB Result	MDL	RL			
Total Dissolved Solids	ND	10.0	10.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Total Dissolved Solids	992	990	1000	99	99	80-120	0.202	10



## Quality Control Report

<b>Client:</b> NRG Energy, LLC	<b>WorkOrder:</b> 2505905
<b>Date Prepared:</b> 05/15/2025	<b>BatchID:</b> 317414
<b>Date Analyzed:</b> 05/15/2025	<b>Extraction Method:</b> SM2540 D
<b>Instrument:</b> WetChem	<b>Analytical Method:</b> SM2540 D
<b>Matrix:</b> Water	<b>Unit:</b> mg/L
<b>Project:</b> Marsh Landing (Clearway)	<b>Sample ID:</b> MB/LCS/LCSD-317414

### QC Summary Report for Total Suspended Solids

Analyte	MB Result	MDL	RL			
Total Suspended Solids	ND	1.00	1.00	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Total Suspended Solids	116	105	100	116	105	80-120	9.95	10



1534 Willow Pass Rd  
Pittsburg, CA 94565-1701  
(925) 252-9262

# CHAIN-OF-CUSTODY RECORD

WorkOrder: 2505905

ClientCode: GOA

QuoteID: 244708

- WaterTrax   
  CLIP   
  EDF   
  EQUIS   
  Dry-Weight   
 Email   
 HardCopy   
 ThirdParty   
 J-flag  
 Detection Summary   
 Excel

**Report to:**

David Frandsen  
NRG Energy, LLC  
3201 Wilbur Avenue  
Antioch, CA 94509  
925-427-3479    FAX: (925) 779-6679

Email: David.Frandsen@nrg.com  
cc/3rd Party: Ryan.Robinson@nrg.com; joe.moura@nrg.  
PO: 4501937084  
Project: Marsh Landing (Clearway)

**Bill to:**

Accounts Payable  
NRG  
112 Telly Street  
New Roads, LA 70760  
invoices@clearwayenergy.coupahost.co

**Requested TATs: 5 days;  
7 days;**

*Date Received:* 05/14/2025  
*Date Logged:* 05/14/2025

Lab ID	ClientSampID	Matrix	Collection Date	Hold	Requested Tests (See legend below)											
					1	2	3	4	5	6	7	8	9	10	11	12
2505905-001	IW-001, ML25-61 C-24	Water	5/14/2025 09:30	<input type="checkbox"/>		A		A								
2505905-001	IW-001, ML25-62 C-24	Water	5/14/2025 09:30	<input type="checkbox"/>	B											
2505905-001	IW-001, ML25-63 C-24	Water	5/14/2025 09:30	<input type="checkbox"/>				C								
2505905-001	IW-001, ML25-64 C-24	Water	5/14/2025 09:30	<input type="checkbox"/>					D							
2505905-001	IW-001, ML25-65 C-24	Water	5/14/2025 09:30	<input type="checkbox"/>			E									

**Test Legend:**

1	BOD_W	2	COD_W	3	METALSMS_TTLC_W(PPM)	4	PRDisposal Fee
5	TDS_W	6	TSS_W	7		8	
9		10		11		12	

**Project Manager: Jennifer Lagerbom**

**Prepared by: Lilly Ortiz**

**Comments:** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

NOTE: Soil samples are discarded 60 days after receipt unless other arrangements are made (Water samples are 30 days).  
Hazardous samples will be returned to client or disposed of at client expense.



### WORK ORDER SUMMARY

**Client Name:** NRG ENERGY, LLC  
**Client Contact:** David Frandsen  
**Contact's Email:** David.Frandsen@nrg.com

**Project:** Marsh Landing (Clearway)

**Work Order:** 2505905  
**QC Level:** LEVEL 2  
**Date Logged:** 5/14/2025

**Comments:** Use QUOTE 234501 for any Marsh Landing projects to get correct analyte list. Always report in mg/L.

WaterTrax     CLIP     EDF     Excel     EQulS     Email     HardCopy     ThirdParty     J-flag

LabID	ClientSampID	Matrix	Test Name	Cont./Comp.	Bottle & Preservative	U**	Head Space	Dry-Weight	Collection Date & Time	TAT	Test Due Date	Sediment Content	Hold	Sub Out
001A	IW-001, ML25-61 C-24	Water	SM5220D (COD)	2	aVOA w/ H2SO4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5/14/2025 9:30	5 days	5/21/2025	Present	<input type="checkbox"/>	<input type="checkbox"/>
001B	IW-001, ML25-62 C-24	Water	SM5210 B (BOD)	1	500mL HDPE, unprsv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5/14/2025 9:30	7 days	5/23/2025	Present	<input type="checkbox"/>	<input type="checkbox"/>
001C	IW-001, ML25-63 C-24	Water	SM2540 C (TDS)	1	500mL HDPE, unprsv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5/14/2025 9:30	5 days	5/21/2025	Present	<input type="checkbox"/>	<input type="checkbox"/>
001D	IW-001, ML25-64 C-24	Water	SM2540 D (TSS)	1	1L HDPE, unprsv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5/14/2025 9:30	5 days	5/21/2025	Present	<input type="checkbox"/>	<input type="checkbox"/>
001E	IW-001, ML25-65 C-24	Water	E200.8 (Metals) <Arsenic, Cadmium, Chromium, Copper, Iron, Lead, Mercury, Molybdenum, Nickel, Selenium, Silver, Zinc>	1	250mL HDPE w/ HNO3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5/14/2025 9:30	5 days	5/21/2025	Present	<input type="checkbox"/>	<input type="checkbox"/>

**NOTES:** \* STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).

- ISM prep requires 5 to 10 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 6 to 11 days from sample submission). Due date listed on WO summary will not accurately reflect the time needed for sample preparation.

- Organic extracts are held for 40 days before disposal; Inorganic extract are held for 30 days.

- MAI assumes that all material present in the provided sampling container is considered part of the sample - MAI does not exclude any material from the sample prior to sample preparation unless requested in writing by the client.

U\*\* = An unpreserved container was received for a method that suggests a preservation in order to extend hold time for analysis.







## Sample Receipt Checklist

Client Name: NRG Energy, LLC  
 Project: Marsh Landing (Clearway)

Date and Time Received: 5/14/2025 11:18  
 Date Logged: 5/14/2025  
 Received by: Agustina Venegas  
 Logged by: Lilly Ortiz

WorkOrder №: 2505905 Matrix: Water  
 Carrier: Client Drop-In

### Chain of Custody (COC) Information

Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sample IDs noted by Client on COC?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Date and Time of collection noted by Client on COC?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sampler's name noted on COC?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
COC agrees with Quote?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

### Sample Receipt Information

Custody seals intact on shipping container/cooler?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Custody seals intact on sample bottles?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Samples in proper containers/bottles?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

### Sample Preservation and Hold Time (HT) Information

All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Samples Received on Ice?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

(Ice Type: WET ICE )

Sample/Temp Blank temperature		Temp: 0.4°C	NA <input type="checkbox"/>
ZHS conditional analyses: VOA meets zero headspace requirement (VOCs, TPHg/BTEX, RSK)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Sample labels checked for correct preservation?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
pH acceptable upon receipt (Metal: <2)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

pH Lot#: HC446507  
 Lot Expiration: 1/31/2028

### UCMR Samples:

pH tested and acceptable upon receipt (200.7: ≤2; 533: 6 - 8; 537.1: 6 - 8)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Free Chlorine tested and acceptable upon receipt (<0.1mg/L) [not applicable to 200.7]?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

-----  
 Comments:

## CALIBRATION DATA RECORD

CUSTOMER <b>NRG Marsh Landing LLC</b>	PROJECT <b>March 2025 Shutdown</b>
INST. I.D. <b>0-FT-950002</b>	MANUF. <b>Rosemount</b>
SERVICE <b>Sanitary and Process Wastewater</b>	
MODEL NO: <b>8732EST2AIN0M4C1Q4</b>	SERIAL NO: <b>337659</b>
INPUT: <b>0-80 GAL/MIN</b>	OUTPUT: <b>4-20 mdc</b>
CAL DATA: <b>Tube Cal # 0926 1052 0923 6005</b>	INST. TYPE: <b>magmeter 3"</b>
SENSOR DATA: <b>0-FE-950002</b>	S/N <b>0218078</b>
	LOCATION: <b>next to office</b>

TEST EQUIPMENT	MODEL	S/N	NIST TEST
Flowtube Simulator	Rosemount 8714D	21407559	235886
Multimeter	Fluke 87	59570079	235123

INPUT		OUTPUT RESULTS		
%	VALUE	DESIRED	AS FOUND	AS LEFT
0	0 Ft/sec	4 mdc	4.000	4.000
10	3 Ft/sec	5.6 mdc	5.600	5.600
33.3	10 Ft/sec	9.33 mdc	9.330	9.330
100	30 Ft/sec	20 mdc	20.000	20.000

ISOLATION VALVE POSITION	AS FOUND: <b>N/A</b>	AS LEFT: <b>N/A</b>
REMARKS: <b>Tube Cal Number 0926105209236005</b>	<b>Calibration Tube Settings 1000015010000000</b>	
<b>Units = GAL/MIN</b>	<b>Calibration Units of measure = Ft/S</b>	
<b>LRV = 0</b>	<b>Cal Analog Output Range: 20mA = 30.00 ft/sec</b>	
<b>URV = 80</b>	<b>Cal Analog Output Zero: 4mA = 0 ft/sec</b>	
<b>Freq = 5 HZ</b>	<b>Cal Freq = 5 HZ</b>	

Reset to customer configuration

PERFORMED BY <b>Drew Farley</b>	DATE: <b>2/19/2025</b>
VERIFIED BY	DATE: <b>2/19/25</b>

**3D Technical Services, Inc.**  
 Clayton, California  
 (925) 691-5543



# Certificate of Calibration



Customer: 3d Technical Services  
Address: 3951 Industrial Way Suite.f Concord, Ca 94520

Contact: Dan Farley

#US4461c

## Instrument Identification

System ID: 1059416	Serial #: 59570079
Tool #: N/A	Property #: N/A
Manufacturer: FLUKE ELECTRONICS	Model #: 87 V
Range: 4.5 DIGIT	
Description: MULTIMETER, TRUE RMS	

## Test Results

Serviced Performed: Calibration	Service Technician: Keith S Lam
Cal Date: 12/30/2024	Cal. Due Date: 12/30/2025
Location of Cal: In-house	Laboratory: Standard Meter Lab
Address: 236 Rickenbacker Cir, Livermore, CA 94551	
As Found Result: In Tolerance	As Left Result: In Tolerance
Environmental Conditions: 68.0 °F / 40.0% RH	Instruction Used: 8XV___CMENG0100

## Technical Remarks

**Condition**  
Received in good condition.

**Analysis**  
Verified accuracy in accordance with the listed calibration instructions.

## Calibration Standards

I.D.	Manufacturer	Model Number	Description	Cal. Due Date	NIST #
1000360	FLUKE ELECTRONICS	5522A/SC600 (ACCREDITED)	CALIBRATOR, MULTI FUNCTION	5/26/2025	228207

Calibrations are performed using standards traceable to NIST. Our calibration system complies with ISO/IEC 17025:2017. This information applies only to the instrument identified above and may not be reproduced, except in full, without prior written consent. The presence of the Intertek logo designates our quality management system is certified to ISO 9001:2015. Reported uncertainties are expressed as expanded values at approximately the 95.45% confidence level using a coverage factor of K=2. There is no implied warranty that the instrument will maintain its specified tolerances during the calibration interval due to possible drift, environment or other factors beyond our control.

Approval Person: Adigrace Riate      Qa Coordinator      Signature: Adigrace Riate      Date: 12/30/2024

Standard Meter Lab, Inc.  
Certificate of CalibrationCustomer: 3d Technical Services  
Address: 3951 Industrial Way Suite.f Concord, Ca 94520

Contact: Dan Farley

#US4461c

## Instrument Identification

System ID: 1059566

Serial #: 21407559

Tool #: NA

Property #: NA

Manufacturer: ROSEMOUNT INC.

Model #: 8714D

Range: (4 to 20) mA DC; (0 to 30) ft/s

Description: SIMULATOR, MAGNETIC FLOW METER

## Test Results

Serviced Performed: Calibration

Service Technician: Keith S Lam

Cal Date: 01/21/2025

Cal. Due Date: 01/21/2026

Location of Cal: In-house

Laboratory: Standard Meter Lab

Address: 236 Rickenbacker Cir, Livermore, CA 94551

As Found Result: In Tolerance

As Left Result: In Tolerance

Environmental Conditions: 71.3 °F / 34.7% RH

Instruction Used: MAN-8714D

## Technical Remarks

## Condition

Received in good condition.

## Analysis

Verified accuracy in accordance with the listed calibration instructions.

## Calibration Standards

I.D.	Manufacturer	Model Number	Description	Cal. Due Date	NIST #
1000069	FLUKE ELECTRONICS	189	MULTIMETER, TRUE RMS, LOGGING	8/23/2025	231038

Calibrations are performed using standards traceable to NIST. Our calibration system complies with ISO/IEC 17025:2017. This information applies only to the instrument identified above and may not be reproduced, except in full, without prior written consent. The presence of the Intertek logo designates our quality management system is certified to ISO 9001:2015. Reported uncertainties are expressed as expanded values at approximately the 95.45% confidence level using a coverage factor of K=2. There is no implied warranty that the instrument will maintain its specified tolerances during the calibration interval due to possible drift, environment or other factors beyond our control.

Approval Person: Adigrace Riate

Qa Coordinator

Signature: Adigrace Riate

Date: 01/21/2025