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Project Title:	METCALF Energy Center Compliance
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Document Title:	ANNUAL COMPLIANCE REPORT - 2025
Description:	ANNUAL COMPLIANCE REPORT - 2025
Filer:	Anwar Ali
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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Metcalf Energy Center, LLC

1 Blanchard Road
Coyote, CA 95013

August 24, 2026

Mr. Anwar Ali
Compliance Project Manager
Systems Assessment & Facility Sitting Division
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Re: Metcalf Energy Center, LLC.
Docket No. 99-AFC-3
Annual Compliance Report for 2025

Dear Mr. Ali:

In accordance with the Conditions of Certification for the Metcalf Energy Center, LLC, this report is intended to fulfill the requirements of the Annual Compliance Report for 2025 in the Conditions of Certification.

Enclosed are the documents required by the Conditions of Certification. The documents are provided as appendices, as noted in the Annual Compliance Summary:

- Annual Compliance Summary
- Conditions of Certification Matrix
- Operating Data Summary
- AQ-13: Gas Turbine and HRSG Firing with Natural Gas
- AQ-14: Heat Input Hourly Limit
- AQ-15: Heat Input daily Limit
- AQ-16: Heat Input Annual Limit
- AQ-17: HRSG Duct Burners Firing
- AQ-18: S-1 and S-2 SCR Operation and Maintenance
- AQ-19: S-3 and S-4 SCR Operation and Maintenance
- AQ-20: Gas Turbine Emissions
- AQ-21: Gas Turbine Mass Emissions
- AQ-22: Gas Turbine Start-up
- AQ-24: Gas Turbine and HRSG Total Combined Daily Emissions
- AQ-25: Gas Turbine and HRSG Total Combined 12-Month Emissions
- AQ-26: Annual Toxic Air Contaminants Emissions
- AQ-27: Operation and Maintenance of Continuous Monitors

- AQ-28: Calculation and Recording of Daily Mass Emissions
- AQ-29: Projected Annual Emissions of Formaldehyde, Benzene, Specific PAHs
- AQ-36: Notification of Violations
- AQ-44: Compliance with 40 CFR Part 75
- AQ-56: Cold Start-up Hours
- BIO-2: Designated Biologist Summaries
- HAZ-1: Hazardous Materials List
- LAND-1: Trail Network Connection
- PUBLIC HEALTH-1: Cooling Tower Inspection
- SOIL & WATER-1: Water Use Summary
- TRANS-3: Permits or Licenses for Hazardous Material Transport
- VIS-1: Treatment of Project Structures
- VIS-10: Visible Plumes
- WASTE-3: Waste Management Comparison

If you have any additional questions, please feel free to contact Rosemary Silva, EHS Manager, at 408-361-4954.

Sincerely,

DS

Signed by:
Christopher Schneider
47AF6295ADBF467...

Christopher Schneider
Plant Manager
Metcalf Energy Center, LLC.

Enclosures: Via Email

Appendix 1

California Energy Commission
2025 Annual Compliance Report
Metcalf Energy Center – 99-AFC-3

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Metcalf Energy Center – 99-AFC-3
2025 Annual Compliance Report

Project Status

The Metcalf Energy Center, LLC (MEC) declared commercial operation (COD) on May 29, 2005. MEC is dispatched into the merchant market by Calpine Energy Services (CES) and participates in the Ancillary Services market with the California ISO.

The Annual Compliance Report has been prepared in accordance with the General Conditions of the Compliance Plan.

1. **An updated compliance matrix which shows the status of all conditions of certification (fully satisfied and/or closed conditions do not need to be included in the matrix after they have been reported as closed).**

   The compliance matrix is included as an attachment. See Appendix 2.

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

   The facility is currently operating in a normal status. There have been no significant changes to facility operations during the reporting year. See Appendix 3

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

   The documents required by specific conditions are included in this report as attachments and are identified in the transmittal letter.

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

   - Petition to maintain the facility's post-commissioning daily and annual emission limits amendment. Order number 05-0316—03, approved on March 16, 2005.

   - Petition for Staff approval of a clarification to the term, "Gas Turbine Cold Start-Up Period", contained in the Air Quality section of the Final Decision for the Metcalf Energy Center. Waiting on issuance of new Title V permit and Permit to Operate from the Bay Area Air District. Approved June 4, 2025

   - **PENDING**: Petition to amend to modify condition of certification VIS-10.

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

   There are currently no outstanding submittals for the 2025 reporting period.

6. **A listing of filings made to, or permits issued by, other governmental agencies during the year.**
   - Annual compliance report submitted to CEC
     - Monthly Plume Abatement Status Reports
   - Annual Permit to Operate BAAQMD

        - Monthly Air Reports
    - Annual Title V Compliance Certification Report submitted to BAAQMD and EPA.
    - Annual Hazardous Material Permit City of San Jose
        - Annual Hazardous Materials Business Plan Update and Certification
    - Annual Fire Safety Permit City of San Jose
    - Annual Business License City of San Jose.
    - Annual Storm Water Report to the State Water Resources Control Board
    - Annual EIA-923S and EIA-860A to the U.S. Department of Energy
    - Quarterly Electronic Data Reporting to the EPA (40 CFR 75)
    - Semi-Annual NSPS Report to the EPA
    - Semi-Annual Title V Monitoring Reports
    - Semi-Annual Wastewater Self-Monitoring Report to the City of San Jose
    - Monthly EIA-923M to the U.S. Department of Energy
    - All submittals, except as noted above, required under our permits have been made on time to include, for the 2025 reporting year.

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

   Currently there are no compliance activities scheduled.

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

   No additions have been made to the on-site compliance files as required by the Decision.

9. **An evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date.**

   An evaluation of the on-site contingency plan for unexpected facility closure was conducted with no modifications. A copy of the plan is attached in Appendix 4.

   In addition, insurance coverage for the site remains current.

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

    - None during the 2025 reporting period.

CONDITIONS OF CERTIFICATION SPECIFIC REQUIREMENTS

AQ-13 **The Gas Turbines and the Heat Recovery Steam Generators shall be fired exclusively on natural gas.**

No violation of this condition occurred for the 2025 reporting year

AQ-14 **The combined heat input rate to each power train shall not exceed 2,124 mmBTU per hour, averaged over any rolling 3-hour period.**

No violation of this condition occurred for the 2025 reporting year

AQ-15 **The combined heat input rate to each power train shall not exceed 49,908 mmBTU per calendar day.**

No violation of this condition occurred for the 2025 reporting year.

AQ-16 **The combined cumulative heat input rate for the Gas Turbines and HRSGs shall not exceed 35,274,060 mmBTU per year.**

No violation of this condition occurred for the 2025 reporting year.

AQ-17 **The HRSG duct burners shall not be fired unless its associated gas turbine is in operation.**

No violation of this condition occurred for the 2025 reporting year.

AQ-18 **S-1 Gas Turbine and S-2 HRSG shall be abated by the properly operated and properly maintained A-1 Selective Catalytic Reduction (SCR) system whenever fuel is combusted at those sources and the A-1 catalyst bed has reached minimum operating temperature.**

No violation of this condition occurred for the 2025 reporting year.

AQ-19 **S-3 Gas Turbine and S-4 HRSG shall be abated by the properly operated and properly maintained A-2 Selective Catalytic Reduction (SCR) system whenever fuel is combusted at those sources and the A-2 catalyst bed has reached minimum operating temperature.**

No violation of this condition occurred for the 2025 reporting year.

AQ-20 **The Gas Turbines and HRSGs shall comply with emission requirements (a) through (h) under all operating scenarios, including duct burner firing mode and steam injection power augmentation mode. Requirements (a) through (h) do not apply during a gas turbine start-up or shutdown.**

There were instances of non-compliance with this condition that occurred in the 2025 reporting year. Please refer to Appendix 14 for details.

AQ-21 **The regulated air pollutant mass emission rates from each of the Gas Turbines during a start-up or a shutdown shall not exceed the limits.**

No violation of this condition occurred for the 2025 reporting year.

AQ-22 **The Gas Turbines shall not be in start-up mode simultaneously.**

No violation of this condition occurred for the 2025 reporting year.

AQ-24 **Total combined emissions from the Gas Turbines and HRSGs including emissions generated from the cooling tower and during Gas Turbine start-ups and shutdowns shall not exceed the following limits during any calendar day.**

No violation of this condition occurred for the 2025 reporting year.

AQ-25 **Combined emissions from the gas turbines and HRSGs, including emissions generated from cooling towers and during gas turbine startups, shutdowns and tuning shall not exceed permit limits during any consecutive twelve (12) month period.**

No violation of this condition occurred for the 2025 reporting year.

AQ-26 **Maximum projected annual toxic air contaminants emissions from the gas turbines shall not exceed permit limits.**

No violation of this condition occurred for the 2025 reporting year.

AQ-27 **Properly operated and maintained continuous monitors.**

Continuous monitors are properly operated and maintained.

AQ-28 **To demonstrate compliance with conditions 20(f), 20(g), 20(h), 21, 24(c') through 24(e), and 25('c) through 25(e) the owner/operator shall calculate and record on a daily basis the POC, PM10, and SO2 mass emissions from each power train.**

No violation of this condition occurred for the 2025 reporting year.

AQ-29 **Calculate and record on an annual basis the maximum projected annual emissions of formaldehyde, benzene, and specific PAHs.**

No violation of this condition occurred for the 2025 reporting year.

AQ-36 **Notification to the District and CPM of any violations of permit conditions.**

No violations occurred during the 2025 reporting year.

AQ-44 **Compliance with the continuous emission monitoring requirements of 40 CFR Part 75.**

No violation of this condition occurred for the 2025 reporting year. See Appendix 5

AQ-56 **Cold Start-up hours shall not exceed 30 hours per calendar year for each turbine.**

No violation of this condition occurred for the 2025 reporting year.

BIO-2 **The CPM approved Designated Biologist shall submit record summaries in the Annual Compliance Report:**

Designated Biologist summary for the 2025-2026 reporting year provided in Appendix 6

HAZ-1 **Do not use any hazardous materials in reportable quantities not listed in attachment 1 or in greater quantities or strengths than those identified unless approved in advance by Santa Clara County and the CPM.**

A hazardous material inventory is included as an attachment and is identified in the table of contents. See Appendix 7.

LAND-1 **At such time as a connection to a trail network can be made, install, and maintain the portion of planned trail that would cross the site.**

No trail updates have been made at this time. MEC is awaiting direction from the City of San Jose for trail construction.

PUBLIC HEALTH-1 **Perform a visual inspection of the cooling tower drift eliminators once per calendar year.**

The inspection sheet is included as an attachment and is identified in the table of contents. See Appendix 8.

SOIL & WATER-1 **Potable water may be used for cooling purposes only in the event that SBWR recycled water service is interrupted.**

A record of water consumption has been included and identified in the table of contents. See Appendix 9.

TRANS-3 **Ensure that all federal and state regulations for the transport of hazardous materials are observed during both construction and operation of the facility.**

No permits or licenses have been acquired concerning the transport of hazardous substances. A list of the hazardous materials deliveries received in 2025 is in Appendix 10.

VIS-1 **Treat the project structures, buildings, and tanks visible to the public in a non-reflective color.**

The plant's structures, buildings, and tanks have all been treated in accordance with this condition of certification. No treatment maintenance has been necessary. A copy of the inspection is in Appendix 11.

VIS-10 **The power plant shall be designed and operated to minimize visible plume.**

The total cooling tower plume hours for 2025 were 13 hours and 26 minutes, as noted in the December 2025 Plume Summary Log. A copy of the submitted log is in Appendix 12.

WASTE-3 **Document the actual waste management methods used during the year compared to planned management methods.**

No violation of this condition occurred. A waste management sheet is included as an attachment and is identified in the table of contents. See Appendix 13.

Appendix 2

METCALF ENERGY CENTER - COMPLIANCE MATRIX						
START OF COMERCIAL OPERATION		5/29/2005				
THROUGH YEAR END OF 2025		12/31/2025				
Condition No.	**Requirements & Task Summary**	**Action required**	**Event**	**Required Submittal Date**	**Date submitted to CPM**	**Status/ Comments**
AQ-13	GTs (S-1, S-3) and HRSG (S-2, S-4) shall be fired exclusively on natural gas. (BACT for SO2 and PM10)	As part of the semiannual Air Quality Reports, indicate the date, time, and duration of any violation of this condition.	Semiannual Air Quality Reports	Ongoing	Monthly and Semi-Annually	Ongoing
AQ-14	Combined heat input rate of each power train (S-1 & S-2, S-3 & S-4) shall not exceed 2,124 MMBtu/hr (3-hour rolling average) (PSD for NOx)	As part of the Air Quality monthly Reports, include information on the date and time when the hourly fuel consumption exceed this hourly limit.	Monthly Air Quality Reports	Ongoing	Monthly	Ongoing
AQ-15	Combined heat input rate of each power train (S-1 & S-2 and S-3 & S-4) shall not exceed 49,908 MMBtu/day (PSD for PM10)	As part of the Air Quality monthly Reports, include information on the date and time when the hourly fuel consumption exceed this daily limit.	Monthly Air Quality Reports	Ongoing	Monthly	Ongoing
AQ-16	Combined cumulative heat input rate of GTs (S-1, S-3) and HRSGs(S-2, S-4) shall not exceed 35,274,060 MMBtu/yr. (Offsets)	As part of the Air Quality annual Reports, include information on the date and time when the annual cumulative fuel consumption exceed this annual limit	Monthly Air Quality Reports	Ongoing	Monthly	Ongoing
AQ-17	HRSGs (S-2, S-4) duct burners shall not be fired unless associated GTs (S-1, S-3) are in operation. (BACT for NOx)	As part of the Air Quality Reports, include information on the date, time, and duration of any violation of this permit condition.	Air Quality Reports	Ongoing	Ongoing	Ongoing
AQ-18	GT/HRSG (S-1/S-2) shall be abated by the A-1 SCR system whenever fuel is combusted in these units and the A-1 catalyst bed has reached min. operating temperature.	As part of the Air Quality Reports, provide information on any major problem in the operation of the Oxidizing Catalyst and Selective Catalytic Reduction Systems for the Gas Turbines and HRSG's.	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-19	GT/HRSG (S-3/S-4) shall be abated by the A-2 SCR system whenever fuel is combusted in these units and the A-2 catalyst bed has reached min. operating temperature.	As part of the Air Quality Reports, provide info. on any major problem in the operation of the Oxidizing Catalyst and Selective Catalytic Reduction Systems for the Gas Turbines and HRSGs.	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(a)	Emission requirements: Emission Point P-1 NOx = 19.2 lbs/hr [0.00904 lbs/MMBtu (HHV) of nat. gas fired] ; Emission Point P-2 NOx = 19.2 lbs/hr [0.00904 lbs/MMBtu (HHV) of nat. gas fired] .	As part of the Semi-Annual Air Quality Reports, indicate the date, time, and duration of any violation. Include quantitative info. on the severity of the violation.	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(b)	NOx Emission concentration = 2.5 ppmvd (corrected to 15% O2), 1-hr average {Emission Point P-1, P-2} (BACT for NOx).	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(c)	CO mass emission = 28.07 lbs/hr (at any 3-hour rolling avg.) (Emission Point P-1, P-2).	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(d)	When the heat input to a CT exceeds 1700 MMBTU/hr (HHV), the CO emission concentration shall not exceed 6.0 ppmvd on dry basis and the CO mass emission rate shall not exceed 0.0132 lb/MMBTU at any 3-hr rolling average.	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing

METCALF ENERGY CENTER - COMPLIANCE MATRIX						
START OF COMERCIAL OPERATION		5/29/2005				
THROUGH YEAR END OF 2025		12/31/2025				
Condition No.	**Requirements & Task Summary**	**Action required**	**Event**	**Required Submittal Date**	**Date submitted to CPM**	**Status/ Comments**
AQ-20(e)	Ammonia (NH3) emission concentration shall not exceed 5 ppmvd on dry basis, at any 3-hour rolling avg. Ammonia injection rate to A-1, A-2 to be verified through continuous recording of rate.	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(f)	Precursor organic compounds (POC) mass emissions (as CH4) shall not exceed 2.7 lbs/hr or 0.00126 lbs/MMBTU of natural gas fired. (Emission points P-1, P-2).	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(g)	Sulfur dioxide (SO 2) mass emissions at P-1 ,P-2 each shall not exceed 1.28 pounds per hour or 0 .0006 lb /MM BTU of natural gas fired. (BACT)	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(h)	PM10 mass emission s at P-1 ,P-2 each shall not exceed 9 pounds per hour or 0.00452 lb PM10/MM BTU. Particulate matter (PM10) mass emissions at P-1 ,P-2 each shall not exceed 12 pounds per hour or 0.00565 lb PM10/MM BTU, when HRSG duct burners are in operation.	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-20(i)	Testing to confirm the PM10 emissions levels shall occur at least three (3) times per year during each of the first two (2) years of operation. Each year, at least one (1) monitoring test shall occur during winter months.	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-21	GT (S-1, S-3) Start-up and Shutdown emission rates.	Same as above	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-22	Not more than one GT (S-1, S-2) shall be in start-up mode at any one time.	In the monthly compliance report the owner/operator shall indicate any violations of this condition.	Monthly Air Quality Reports	Ongoing	Ongoing	Ongoing
AQ-24	Total combined emissions in lbs/day, from GTs and HRSGs (S-1, S-2, S-3, S-4), including start-up and shutdown.	As part of the Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Semi-Annual Air Quality Reports	Ongoing	Semi-Annual	Ongoing
AQ-25	Cumulative combined emissions in tons/any consecutive 12-month period, from GTs and HRSGs shall not exceed Nox = 123.4 (offsets), CO=588, POC=28 (offsets), PM10=91.3 (offsets), SO2=10.6 (cumulative increase).	As part of the Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Air Quality Reports	Ongoing	Monthly/Annual	Ongoing
AQ-26	Maximum projected combined annual toxic air contaminant emissions from GTs and HRSGs (S-1, S-2, S-3, S-4). (a) formaldehyde = 3,796 lbs/yr (b) Benzene = 480 lbs/yr (c) PAHs=22.8 lbs/yr	As part of the annual Air Quality Reports, indicate the date, duration, and severity of any violation including quantitative information on the severity of the violation.	Annual Air Quality Reports	Ongoing	Monthly/Annual	Ongoing

METCALF ENERGY CENTER - COMPLIANCE MATRIX						
START OF COMERCIAL OPERATION		5/29/2005				
THROUGH YEAR END OF 2025		12/31/2025				
Condition No.	**Requirements & Task Summary**	**Action required**	**Event**	**Required Submittal Date**	**Date submitted to CPM**	**Status/ Comments**
AQ-26	Perform health risk assessment using emission rates per BAAQMD approved procedures and submit risk analysis to District and CPM.	As part of the annual Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation or submit risk analysis to District and CPM.	Within 60 days of source test date	Ongoing	Monthly/Annual	Ongoing
AQ-27 (a-d)	Demonstrate compliance with conditions 14-17, 20(a-d), 21, 22, 24(a), 24(b), 25(a), 25(b) by using continuous monitors during all operating hours for the following parameters.	As part of the annual Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Annual Air Quality Reports	Ongoing	Monthly/Annual	Ongoing
AQ-27(e-f)	Use parameters in condition 27(a-d) and District approved methods to calculate the following. (e) Heat input rate for S-1 & S-2 combined, and S-3 & S-4 combined (f) Corrected NOx and CO concentrations and mass emissions at each exhaust point (P-1, P-2)	As part of the annual Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Annual Air Quality Reports	Ongoing	Monthly/Annual	Ongoing
AQ-27(g-l)	For each source, source grouping, or exhaust point record parameters at least once every 15 minutes and calculate and record for the following. Refer to AQ-27 for further details.	As part of the annual Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Annual Air Quality Reports	Ongoing	Monthly/Annual	Ongoing
AQ-28(a-b)	Demonstrate compliance with conditions 20, 21, 24, 25 by calculating and recording on a daily basis POC, PM10, and SO2 mass emissions fine PM10 and SO2 from each power train.	As part of the monthly Air Quality Reports, the owner/operator shall indicate the date of any violation including quantitative information on the severity of the violation.	Monthly Air Quality Reports	Ongoing	Monthly/Annual	Ongoing
AQ-29	Calculate and record on annual basis the max. projected annual emissions of formaldehyde, benzene, Specified Poly-Aromatic Hydrocarbons (PAH's).	As part of the annual Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Annual Air Quality Reports	Ongoing	Annual	Ongoing
AQ-35	Maintain records and reports on site for a minimum of 5 years.	During site inspection, make all records and reports available to the District, California Air Resources Board, and CEC staffs.	AQ Inspection per AQ-35	Ongoing	Ongoing	Ongoing
AQ-36	Notify District and CPM of any violations of these permit conditions.	Submittal of these notifications as required by this condition is the verification of these permit conditions.	Violation of Permit Conditions	Ongoing	Ongoing	Ongoing
AQ-44	MEC shall comply with the continuous emission monitoring requirements of 40 CFR Part 75			Ongoing	Ongoing	Ongoing
AQ-45	Take monthly samples of natural gas combusted at MEC and analyze these samples for sulfur content using District-approved lab methods.	Maintain on site the records of all the guarantees received from its natural gas suppliers indicating that the fuel delivered to MEC complies with the 40 CFR Part 60,Subpart GG.	On-site Compliance Inspections	Ongoing	Monthly	Ongoing

METCALF ENERGY CENTER - COMPLIANCE MATRIX						
START OF COMERCIAL OPERATION		5/29/2005				
THROUGH YEAR END OF 2025		12/31/2025				
Condition No.	**Requirements & Task Summary**	**Action required**	**Event**	**Required Submittal Date**	**Date submitted to CPM**	**Status/ Comments**
AQ-47a	Perform visual inspection of cooling tower drift eliminators once per calendar year and repair or replace any drift eliminators which are broken or missing.	As part of the monthly Air Quality Reports, indicate the date of any violation of this Condition.	Air Quality Reports	Ongoing	Annual	Ongoing
AQ-53	The heat input to the fire pump diesel engine shall not exceed 211 MM BTU totaled over any consecutive twelve month period.	As part of the monthly Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Air Quality Reports	Ongoing	Monthly	Ongoing
AQ-54	The total hours of operation of the emergency generator shall not exceed 200 hours per calendar year, plus an additional 100 hours per calendar year for the purposes of maintenance and testing.	As part of the monthly Air Quality Reports, indicate the date of any violation of this Condition including quantitative information on the severity of the violation.	Air Quality Reports	Ongoing	Annual	Ongoing
AQ-56	Cold Start-up hours shall not exceed 30 hours per calendar year for each Gas Turbine.	Provide dates and durations of any violation of this Condition to the CPM.	Air Quality Reports	Ongoing	Annual	Ongoing
AQ-57	Record start time, end time, and duration of Gas Turbine Cold Startup and Combustor Tuning Periods.	Make all records available to Agencies during inspection.	Ongoing	Ongoing	Ongoing	Ongoing
BIO-2	The CPM approved Designated Biologist shall perform the following during project construction and operation: see BIO-2 for detailed tasks.	Submit record summaries in the Annual Compliance Report.	Annual Compliance Report	Annual	Annual	Ongoing
BIO-12	Incorporate into closure plan measures that address the local biological resources and incorporate into the BRMIMP.	Address all biological resource-related issues associated with facility closure.	12 months prior to facility closure	Ongoing	12 months Prior to Closure	Ongoing
HAZ-1	Do not use any hazardous material in reportable quantities, not listed in Attachment 1 or in greater quantities or strengths than those identified unless approved in advance by Santa Clara County and the CPM.	Provide to the CPM and Santa Clara County, in the Annual Compliance Report, a list of hazardous materials contained at the facility in reportable quantities.	Annual Compliance Report	Ongoing	Annual	Ongoing
LAND-1	At such time as a connection to a trail network can be made, install and maintain the portion of the planned trail that would cross the site.	In the Annual Compliance Reports provide updates on trail developments in the area around the site.	Annual Compliance Report	Ongoing	Annual	Ongoing
NOISE-2	Throughout the construction and operation, document, investigate, evaluate and attempt to resolve all project related noise complaints.	File a copy of the Noise Complaint Resolution Form with City of San Jose and with the CPM documenting the resolution of the complaint.	30 days after receiving a noise complaint	Ongoing	Within 30 Days	Ongoing
PAL-7	Include in the facility closure plan a description regarding facility closure activity's potential to impact paleontological resources.	Include a description of closure activities in the facility closure plan.	12 months prior to facility closure	Ongoing	12 months Prior to Closure	Ongoing

METCALF ENERGY CENTER - COMPLIANCE MATRIX						
START OF COMERCIAL OPERATION		5/29/2005				
THROUGH YEAR END OF 2025		12/31/2025				
Condition No.	**Requirements & Task Summary**	**Action required**	**Event**	**Required Submittal Date**	**Date submitted to CPM**	**Status/ Comments**
Public Health-1	Perform a visual inspection of the cooling tower drift eliminators once per calendar year. Prior to initial operation of the project, have the cooling tower vendor's field representative inspect the cooling tower drift eliminator and certify that the installation was performed in a satisfactory manner.	The project owner shall include the results of the annual inspection of the cooling tower drift eliminators and a description of any repairs performed in the next required compliance report.	Annual Compliance Report	Ongoing	Annual	Ongoing
SOIL & WATER-1	Potable water may be used for cooling purposes only in the event that SBWR recycled water service is interrupted.	Provide a record of water consumption for the MEC.	Annual Compliance Report	Ongoing	Annual	Ongoing
TRANS-3	Ensure that all federal and state regulations for the transport of hazardous materials are observed.	Copies of all permits and licenses acquired concerning the transport of hazardous substances.	Annual Compliance Report	Ongoing	Annual	Ongoing
VIS-1	Treat the project structures, buildings, and tanks visible to the public in a non-reflective color.	The project owner shall provide a status report regarding treatment maintenance in the Annual Compliance Report.	Annual Compliance Report	Ongoing	Annual	Ongoing
VIS-11	Trail development along the Fisher Creek corridor adjacent to the power plant site.	The project owner shall submit to the City of San Jose and the County of Santa Clara Parks and Recreation Department for review and comment a specific plan.	Start of construction of the trail between Blanchard Road and railroad tracks	Ongoing	Ongoing	Ongoing
VIS-11	Trail development along the Fisher Creek corridor adjacent to the power plant site.	Submit to the CPM for review and approval a specific plan describing its landscape plan.	Start of construction of the trail between Blanchard Road and railroad tracks	Ongoing	Ongoing	Ongoing
VIS-11	Trail development along the Fisher Creek corridor adjacent to the power plant site.	Submit any required revisions.	Within 30 days of notification by the CPM.	Ongoing	Within 30 days	Ongoing
VIS-11	Trail development along the Fisher Creek corridor adjacent to the power plant site.	Notify the CPM, City of San Jose and County of Santa Clara Parks and Recreation Department that the planting installation is ready for inspection.	7 days after completion of planting installation	Ongoing	Within 7 days	Ongoing
WASTE-2	Upon becoming aware of any impending waste management-related enforcement action, notify the CPM of any such enforcement action.	Notify the CPM in writing within 10 days of becoming aware of an impending enforcement action.	Within 10 days of becoming aware of an impending enforcement action	Ongoing	Within 10 Days	Ongoing
WASTE-3	Prepare and submit to the CPM a waste management plan for all wastes generated during construction and operation of the facility.	In the Annual Compliance Reports, document the actual waste management methods used during the year compared to planned management methods.	Annual Compliance Report	8/1/06	Annual	Ongoing
Compliance matrix	A compliance matrix shall be submitted by along with each annual compliance report.	Submit compliance matrix to CPM	Annual Compliance Report	Ongoing	Annual	Ongoing

Appendix 3

Operating Data Summary January 2025 - December 2025

Metcalf CT1			Metcalf CT2			Metcalf ST1		
Date	**Total Net MWh**	**Total Primary Fuel Quantity Burned (MMcf GG)**	**Date**	**Total Net MWh**	**Total Primary Fuel Quantity Burned (MMcf GG)**	**Date**	**Total Net MWh**	**Total Secondary Fuel Quantity Burned (MMcf GG)**
January	76,501	859.3	January	65,296	748.9	January	86,224	67.98
February	55,645	633.6	February	61,703	704.5	February	71,435	53.08
March	81,638	933.8	March	62,090	721.8	March	86,363	40.18
April	40,825	465.0	April	58,027	674.2	April	59,652	35.12
May	9,778	117.1	May	24,505	281.9	May	19,104	10.70
June	7,627	87.7	June	41,966	492.2	June	28,057	13.80
July	59,516	686.4	July	72,017	829.8	July	83,089	61.98
August	98,387	1,121.8	August	99,911	1,127.6	August	126,859	106.63
September	77,120	874.4	September	86,940	979.4	September	105,973	88.90
October	88,327	998.9	October	92,406	1,038.0	October	110,026	60.63
November	41,923	472.0	November	4,969	56.4	November	26,618	29.62
December	64,846	719.2	December	76,264	854.6	December	82,740	40.36

Appendix 4

Date	Description of Revision	Revision No.	Revised By:
6/01/2005	Planned Developed	1	Dana Petrin
8/08/2008	Plan reviewed and contacted information updated.	2	Rosemary Silva
8/24/2009	Annual Review – Updated the notification list, updated the chemical inventory.	3	Rosemary Silva
8/06/2010	Annual Review – Updated the chemical list and CEC contact	4	Rosemary Silva
8/29/2011	Annual Review – Update contact list and chemical list	5	Rosemary Silva
8/24/2012	Annual Review - Updated the contact information for the regulatory agencies. Also updated the chemical list included in the plan. The updated plan was submitted as part of the annual compliance report for reporting year 2011.	6	Rosemary Silva
8/19/2013	Annual Review – Updated contact information and chemical list. The updated plan was submitted as part of the annual compliance report for reporting year 2012.	7	Rosemary Silva
11/07/2014	Annual Review – Updated the Wastewater Inspector information	8	Rosemary Silva
12/30/2015	Annual Review – No Changes	-	Rosemary Silva
8/08/2016	Annual Review – Updated contact information for CEC and HazMat Inspector	9	Rosemary Silva
8/22/2017	Annual Review – Updated contact information for PGE	10	Rosemary Silva
8/10/2018	Annual Review – Updated contact information for City of San Jose Wastewater Inspector	11	Rosemary Silva
8/09/2019	Annual Review – No changes	-	Rosemary Silva
8/06/2020	Annual Review – No changes	-	Rosemary Silva
8/05/2021	Annual Review – Update to the contact information for Santa Clara Environmental Health Department	12	Rosemary Silva
7/27/2022	Annual Review – Updated the San Jose Fire Department Inspector contact information	13	Rosemary Silva
8/10/2023	Annual Review – No changes	-	Rosemary Silva
1/19/2024	Updated the PG&E Customer Rep name and email	14	Rosemary Silva
3/04/2024	Updated the PG&E Customer Rep name and email	15	Rosemary Silva
8/19/2024	Annual Review – updated the plan to include minor additions is to comply with the requirements of CPUC GO-167	16	Rosemary Silva
8/20/2025	Annual Review – No changes	-	Rosemary Silva
8/20/2026	Annual Review – No changes	-	Rosemary Silva

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1.0 PURPOSE

This plan was developed to provide an on-site contingency plan to ensure that the unexpected closure occurs in such a way that public health and safety and the environment are protected from adverse impacts. The plan covers written procedures concerning site security, hazardous materials and waste removal, and insurance and warranty coverage.

2.0 SCOPE

The plan was prepared in accordance with the California Energy Commission's (CEC) Decision, Docket Number 99-AFC-03 and covers the following facility:

Metcalf Energy Center, LLC (MEC)
1 Blanchard Road
San Jose, CA 95013

Telephone Number: (408) 361-4900
Type and Nature of Business: SIC 4911 Electric Power Production

3.0 RESPONSIBILITIES

3.1 PLANT MANAGER

The Plant Manager has the overall responsibility for ensuring all provisions of this plan are administered and adhered to.

3.2 OPERATIONS MANAGER AND MAINTENANCE MANAGER

The Operations Manager and Maintenance Manager are responsible for overseeing the program, and notification to the CEC & CPUC.

3.3 EHS SPECIALIST

The EHS Specialist is responsible for assisting with any required agency notifications.

4.0 GENERAL

The unit or facility will remain in a ready for service condition until it has been affirmed that it is unneeded by all regulating bodies.

4.1 NOTIFICATION PROCEDURES

In the event of an unexpected temporary or permanent closure, the Plant Manager or designee shall notify the CEC Compliance Project Manager (CPM) and other responsible agencies within 24 hours and take all necessary steps to implement this Plan. Notification shall be made by either telephone or e-mail (see **Table 1**). The Operations Manager, Maintenance Manager, or EHS Specialist shall keep the CPM informed of the circumstances and expected duration of the closure.

90 days prior to the long-term status change of a unit or the facility the California Public Utilities Commission will be notified in writing with a description of the planned change.

The California Public Utilities Commission will be notified in writing 90 days prior to a change in facility ownership.

If it is determined that a temporary closure is likely to be permanent, or for a duration of more than twelve months, a closure plan consistent with CEC requirements for a planned closure shall be developed and submitted to the CPM within 90 days or the CPM's determination (or another period mutually agreed to by the owner and the CPM).

90 days prior to the long-term status change of a unit or the facility plans and/or procedures for storage and restart of the unit or facility will be provided to the California Public Utilities Commission.

TABLE 1 - AGENCIES TO BE NOTIFIED

California Energy Commission	
Anwar Ali Compliance Project Manager California Energy Commission 1516 9th St. Sacramento, CA 95814-5504	Tel: (916) 654-5020 Fax: (916) 651-8868 Email: anwar.ali@energy.ca.gov
San Jose Fire Department (Hazardous Materials)	
Farheen Sultana San Jose Fire Department 200 E. Santa Clara St., 2nd Fl. Tower San Jose, CA 95113	Email: farheen.sultana@sanjoseca.gov
Santa Clara Environmental Health Department	
Robin Ward Sr. Hazardous Materials Specialist 1555 Berger Dr. San Jose, CA 95112	Tel: (408) 918-1945 Email: robin.ward@cep.sccgov.org
Regional Water Quality Control Board	
San Francisco Bay Regional Water Quality Control Board-Region 2 1515 Clay St. Suite 1400 Oakland, CA 94612	Tel: (510) 622-2300 Fax: (510) 622-2460 Email: info2@waterboards.ca.gov
South Bay Water Recycling	
Pedro Hernandez South Bay Water Recycling Environmental Services Dept. City of San Jose 200 East Santa Clara Street, 4th Floor San Jose, CA 95131	Tel: (408) 794-6804 Email: pedro.hernandez@sanjoseca.gov

San Jose/Santa Clara Water Pollution Control Plant	
Kimberly DeVillier Environmental Inspector City of San Jose 200 E. Santa Clara Street, 7th Floor San Jose, CA 95113	Tel: (408) 793-5359 Fax: (408) 271-1930 Email: kimberly.devillier@sanjoseca.gov
Bay Area Air Quality Management District	
Xuna Cai Senior Air Quality Engineer Engineering Division Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, Ca 94105	Tel: (650) 420-3749 Email: xcai@baaqmd.gov
Pacific Gas and Electric	
Chad Stout Customer Service Representative PG&E 2230 Lake Washington Blvd West Sacramento, CA 95691	Tel: (831) 784-3333 Email: C5SR@pge.com
Cal-ISO	
CAL-ISO Outage Coordination P.O. Box 639014 Folsom, CA 95763-9014	Tel: (916) 351-2241
US Environment Protection Agency – Region IX	
US EPA Region IX 75 Hawthorne Street San Francisco, CA 94105-3901	Tel: (415) 972-3990 Fax: (415) 947-3579 Email: reo9@epa.gov
California Public Utilities Commission	
California Public Utilities Commission 505 Van Ness Avenue San Francisco, California 94102	Email: GO167@cpuc.ca.gov

4.2 PLANT SHUT DOWN PROCEDURE

In the event of a plant closure, MEC, personnel will shut down all operating equipment that is not necessary to respond to an emergency, in accordance with plant operating procedures. In the event of an emergency shutdown (e.g., fire, earthquake, sabotage, etc.), MEC personnel should consult the MEC Emergency Response Plan, ERP. The purpose of the ERP is to provide emergency response guidelines so that the MEC shift, and management personnel can adequately evaluate the situation and respond in the interests of protecting personnel, company resources, and the environment.

The ERP provides guidelines for emergencies, including accidental release of toxic gases, chemical spills, fires, explosions, bomb threats, civil disobedience, and personnel injuries. There are several situations that may require emergency response by site personnel. The response required for each situation may vary, and each requires a separate course of action. Personnel should reference the facility ERP for proper response.

4.3 SITE SECURITY AND EMERGENCY RESPONSE

The plant perimeter is surrounded by a chain link fence. The main gate is located on Blanchard Road. Remote cameras monitor the perimeter entry into the Plant 24 hours per day, 365 days per year by Control Room Personnel. The duties of the Plant Operators include checking plant security measures during the shift.

In the event of an unexpected closure, MEC will ensure that all fencing is intact and a manned guard or private security services it used to maintain site security, if necessary.

In the event of an emergency, the San Jose Fire Department (SJFD) will have access through the main gate via a Knox Box. Additionally, the SJFD has been supplied with a Hazardous Materials Business Plan, Risk Management Plan, and Fire Protection and Prevention Plan. The information contained in these plans will enable SJFD to respond to any emergency if the plant personnel have evacuated the premises.

4.4 HAZARDOUS MATERIAL AND WASTE REMOVAL

Handling and disposal of all hazardous materials and wastes shall be in accordance with all applicable laws, ordinances, regulations, and standards. Figure 1 identifies all hazardous materials that are located at MEC in reportable quantities. In the event of an unexpected temporary closure, not all hazardous materials will require removal. If such an event occurs, MEC will conduct visual inspections of all hazardous material storage vessels daily to assess container condition. This process can be done remotely via site cameras if necessary.

MEC has implemented a Hazardous Materials Business Plan, HMBP, to assist with the identification and handling of all hazardous materials. In addition to HMBP other plans have been developed to assist plant personnel and emergency responders with handling of hazardous materials located at MEC.

Refer to Figure 1 on the following Page.

FIGURE 1 - HAZARDOUS MATERIALS IN REPORTABLE QUANTITIESLOCATED AT METCALF

CHEMICAL NAME	CHEMICAL LOCATION
*MISCELLANEOUS FLAMMABLE LIQUID, CLASS IB	MAINTENANCE SHOP
*MISCELLANEOUS FLAMMABLE LIQUID, CLASS IB	Steam Turbine Flammable Locker
*MISCELLANEOUS FLAMMABLE LIQUID, CLASS IB	PROPANE STORAGE
76 Triton 5005 GEO SAE 30	Lube Oil Storage
76 TURBINE OIL 68	Lube Oil Storage
76 TURBINE OIL 68	Combustion Turbine Lube Oil
ACETYLENE	MAINTENANCE SHOP
AMMONIA	Aqueous Ammonia Storage Area
ARGON / CARBON DIOXIDE	MAINTENANCE SHOP
ARGON, COMPRESSED	MAINTENANCE SHOP
ARGON, COMPRESSED	CYLINDER GAS STORAGE
ARGON/CARBON MONOXIDE	CYLINDER GAS STORAGE
CALIBRATION GAS (NITROGEN, CARBON MONOXIDE)	CYLINDER GAS STORAGE
CARBON DIOXIDE	MAINTENANCE SHOP
CARBON DIOXIDE	VARIOUS
CHEMTREAT BL-152	Boiler Water Chemical Treatment Area
CHEMTREAT BL-152	WATER TREATMENT BUILDING
CHEMTREAT BL1794	Boiler Water Chemical Treatment Area
CHEMTREAT BL-8301	WATER TREATMENT BUILDING
CHEMTREAT BL-8401	WATER TREATMENT BUILDING
CHEMTREAT BL-8401	Boiler Water Chemical Treatment Area
CHEMTREAT CL2250	WATER TREATMENT BUILDING
CHEMTREAT CL243	Cooling Tower Chemical Treatment Area
CHEMTREAT CL-2875	WATER TREATMENT BUILDING
CHEMTREAT CL4500	Cooling Tower Chemical Treatment Area
CHEMTREAT P873L	WATER TREATMENT BUILDING
CHEMTREAT RL1245	WATER TREATMENT BUILDING
CHEMTREAT RL9007	WATER TREATMENT BUILDING
CHEMTREAT-BL-1794	WATER TREATMENT BUILDING
CONNTECT 6000	WATER TREATMENT BUILDING
CONOCO PHILLIPS MEGA FLOW 32	BOILER FEED PUMPS
CONOCO PHILLIPS TURBINE OIL 32	STEAM TURBINE PACKAGE
CT WATER WASH	CT WASH WATER SUMP
DEBRIS/RAGS CONTAMINATED WITH PETROLEUM/OIL	Hazardous Material Storage Area
DIESEL	Fire Pump House
DIESEL EXHAUST FLUID	Steam Turbine Under Deck
DIESEL FUEL	Steam Turbine Flammable Locker

CHEMICAL NAME	CHEMICAL LOCATION
DOLOMITIC HYDRATED LIME	Steam Turbine Under Deck
FLOODED LEAD-CALCIUM BATTERY	SWITCH YARD
FYRQUEL EHC PLUS	Lube Oil Storage
FYRQUEL EHC PLUS	Steam Turbine Under Deck
GASOLINE	Steam Turbine Flammable Locker
HELIUM	CYLINDER GAS STORAGE
HYDRO HEAT	MAINTENANCE SHOP
HYTRANS 61	GSU Transformers
HYTRANS 61	AUXILLARY TRANSFORMERS
HYTRANS 61	STATION SERVICE TRANSFORMERS
LEAD-ACID BATTERY	BALANCE OF PLANT
LEAD-ACID BATTERY	COMBUSTION TURBINE #1
LEAD-ACID BATTERY	COMBUSTION TURBINE #2
LEAD-ACID BATTERY	DIESEL FIRE PUMP HOUSE
LUBRICATING OIL	FUEL GAS COMPRESSORS
Megaflow AW HVI Hydraulic Oil	Lube Oil Storage
MISCELLANEOUS LUBE OIL	Lube Oil Storage
MOBIL DTE 26	Lube Oil Storage
MOBIL DTE 26	CT CONTROL OIL TANK
MOBIL DTE 26	Steam Turbine Under Deck
MULTIPURPOSE R+O OIL 220	Lube Oil Storage
NITROGEN	CYLINDER GAS STORAGE
NITROGEN	UNIT 2 NITROGEN STORAGE
NITROGEN	UNIT 1 NITROGEN STORAGE
NITROGEN / NITRIC OXIDE CALIBRATION GAS	CYLINDER GAS STORAGE
NITROGEN / NITRIC OXIDE CALIBRATION GAS	UNIT 1 CEMS GASES
NITROGEN / NITRIC OXIDE CALIBRATION GAS	UNIT 2 CEMS GASES
NITROGEN / OXYGEN CALIBRATION GAS	CYLINDER GAS STORAGE
NITROGEN / OXYGEN CALIBRATION GAS	UNIT 1 CEMS GASES
NITROGEN / OXYGEN CALIBRATION GAS	UNIT 2 CEMS GASES
NITROGEN, COMPRESSED	AUXILLARY TRANSFORMERS
NITROGEN/CARBON MONOXIDE CALIBRATION GAS	UNIT 1 CEMS GASES
NITROGEN/CARBON MONOXIDE CALIBRATION GAS	UNIT 2 CEMS GASES
OXYGEN	MAINTENANCE SHOP
Oxygen	CYLINDER GAS STORAGE
Phillips Turbine Oil 100	Lube Oil Storage
PROPANE	PROPANE STORAGE
Release Number 1 VOC	Lube Oil Storage
Reolube HYD 46	Lube Oil Storage

CHEMICAL NAME	CHEMICAL LOCATION
Shell Morlina S3 BA 220	Steam Turbine Under Deck
Shell Morlina S3 BA 220	Lube Oil Storage
SHELL TELLUS OIL	Lube Oil Storage
Shell Turbo Oil DR 46	Lube Oil Storage
Shell Turbo Oil DR 46	STEAM TURBINE CONTROL OIL TANK
SHELL TURBO OIL T 32	Steam Turbine Under Deck
Sodium Carbonate, Anhydrous	Connex Near Storm Water Pond
SODIUM HYPOCHLORITE 12.5%	Cooling Tower Chemical Treatment Area
SODIUM HYPOCHLORITE 12.5%	WATER TREATMENT BUILDING
SULFUR HEXAFLUORIDE	SWITCH YARD
SULFURIC ACID 93%	Cooling Tower Chemical Treatment Area
TURBO T OIL 32	Lube Oil Storage
USED OIL	Hazardous Material Storage Area
USED OIL	OIL/WATER SEPARATOR
USED OIL	Steam Turbine Under Deck
USED OIL FILTERS	Hazardous Material Storage Area
Vaprotec Light	Lube Oil Storage

4.4 HAZARDOUS MATERIAL AND WASTE REMOVAL, continued

Whenever practical, hazardous materials will be returned to the vendor or transferred to another Calpine site that has the need for the material(s). The following transporters or other qualified transporters will be used if it is deemed necessary to remove any hazardous material(s).

TRANSPORTER	TELEPHONE NUMBER
Bayview Environmental	510-562-6181
Hill Brothers Chemical Company	408-421-0043

If the unexpected temporary closure also results in a release of hazardous materials or waste, plant personnel will consult the Emergency Response Plan, HMBP, and/or Risk Management Plan. These plans address accidental release prevention and emergency policies, a hazardous materials inventory, employee training, and location of safety equipment, main utility shutoffs, notification methods, and accident investigation procedures.

In addition, the Storm Water Pollution Prevention Plan, SWPP, and the Spill Prevention Control and Countermeasure Plan, SPCC, describe the necessary actions in the event of a spill that might threaten off site locations. Both structural and non-structural Best Management Practices (BMPs) are utilized at the site to reduce pollutants in storm water discharge. Structural BMPs include such measures as valves, berms, curbs, and containment structures that are used to hold or divert storm water. Non-structural BMPs include such measures as regular inspections, good housekeeping, employee training, and special procedures for storing/loading hazardous materials and wastes. Plant personnel shall consult all these plans prior to proceeding with any hazardous material or waste removal.

5.0 INSURANCE AND WARRANTY COVERAGE

MEC is insured under an "All-Risk" Builder's Risk policy for property damage and business interruption. The policy is provided by several insurance companies led by Underwriters at Lloyds of London. Liability insurance is provided by Liberty Mutual.

6.0 UNEXPECTED TEMPORARY CLOSURE

If the MEC closed temporarily, there are additional tasks to be performed, including notifications for areas of transmission line engineering and biological resources.

6.1 TRANSMISSION LINE ENGINEERING

MEC signed a third-party Generator Interconnection Agreement (GIA), with PG&E and CAISO. In the event of a planned, unexpected temporary, and unexpected permanent closure contact shall be made with PG&E and Cal ISO to ensure compliance with all applicable laws, ordinances, regulations, and standards (LORS), and that system safety and reliability will not be jeopardized.

6.2 BIOLOGICAL RESOURCES

In the case of temporary closure, measures to protect biological resources would be needed only if there was a potential to surface disturbances or releases of harmful materials. If such an event occurs, MEC will consult with responsible agencies to plan clean up and mitigation of impacts to biological resources.

7.0 PERMANENT CLOSURE

In the event the MEC is closed permanently, there are additional tasks that need to be performed, including preparing a facility closure plan, notifying agencies, ensuring site security, removing hazardous materials and waste.

7.1 FACILITY CLOSURE PLAN

To ensure that the permanent closure does not create adverse impacts, a closure process will be undertaken by MEC that provides for careful consideration of available options, applicable laws, ordinances, regulations, standards, and local plans in existence at the time of closure. MEC will meet with the CEC and other agencies as necessary prior to the development of the closure plan to establish the elements of the plan. In accordance with CEC Conditions of Certification, the plan will include the following:

1) Identify and discuss any impacts and mitigation to address significant adverse impacts associated with proposed closure activities and to address facilities, equipment, or other project related remnants that will remain at the site.
2) Identify a schedule of activities for closure of the power plant site, transmission line corridor, and all other appurtenant facilities constructed as part of the project.
3) Identify any facilities or equipment intended to remain on site after closure, the reason, and any future use.
4) Address conformance of the plan with all applicable laws, ordinances, regulations, standards, local/regional plans in existence at the time of facility closure, and applicable conditions of certification.

5) Removal of transmission conductors when they are no longer used or useful.
6) Removal of all power plant site facilities and related facilities.
7) Measures to restore wildlife habitat to promote the re-establishment of native plant and wildlife species.
8) Revegetation of the plant site and other disturbed areas utilizing appropriate seed mixture.

The plan will be submitted to the CEC CPM, Santa Clara County, and City of San Jose for review and approval at least 12 months (or other mutually agreed to time) prior to commencing the permanent closure activities.

7.2 AGENCY NOTIFICATION

Additional notification may be necessary in the event of a permanent closure, including re-notifying each of the agencies listed in Table 1. The Closure Plan will also be sent to those appropriate agencies with which MEC has a current permit (e.g., Regional Water Quality Control Board, Bay Area Air Quality Management District, USEPA, etc.)

7.3 SITE SECURITY

Prior to permanent closure, the Plant Manager or designee will notify the San Jose Fire Department and City of San Jose Police Department, giving the notice that the existing level of site surveillance will not be in effect. This will enable these agencies to respond appropriately in the event of a disturbance or fire. It may be necessary for MEC to provide site security for a period following permanent closure, the Plant Manager or designee will determine the need for such interim security and will address it in the Closure Plan, if necessary.

7.4 REMOVAL OF HAZARDOUS MATERIALS AND WASTE

As required by the CEC Commission Decision, MEC is responsible for removing all hazardous materials from the site as part of permanent site closure. If MEC intends to redevelop the site, other plans may be made to either remove or store materials in different locations. The details of the removal will be covered in the Closure Plan.

7.5 BIOLOGICAL, CULTURAL, AND PALEONTOLOGICAL RESOURCES

When a permanent Closure Plan is prepared, it will include the take avoidance and mitigation requirements in effect at the time for the species that would be impacted. The plan will also include the removal of the transmission facilities when they are no longer used and useful and reclamation of areas where facilities would be removed. This may include ripping of soil contouring of disturbed areas, implementation of erosion control, revegetation, and other measures deemed appropriate at the time the Closure Plan is developed.

Biological resources compliance reporting for closure activities would likely include pre-activity survey reports, environmental monitoring reports during reclamation, and a final report describing the closure activities and any follow-on reclamation work that would be required.

The permanent Closure Plan will include a description regarding the potential of the closure activities to impact cultural and paleontological resources. The closure requirements are to be based upon the Cultural Resources and Paleontological Resources Final Report. If no activities are proposed that would

potentially impact either of these resources, no mitigation measures will be required. Should a discovery be made, it will be necessary to update the Cultural Resources and Paleontological Resources final report.

The facility will comply with all COC's including contracting with qualified Cultural, Paleontological, Native American and Biological Monitors when condition require. These monitors will be identified in the final Closure Plan if required.

Appendix 5

Re: Metcalf Energy Center (55393) - 1

Dear Certifying Official:

Thank you for submitting your Quarterly Emissions Report using the U. S. EPA`s Emissions Collection and Monitoring Plan System (ECMPS) software. This ECMPS Feedback report provides you with a detailed submission receipt, a summary of the evaluations performed on your submission, and guidance on any follow-up actions needed if any errors were found. EPA has also received a copy of this Feedback Report as part of your submission.

SUBMISSION STATUS

The EPA has received your Quarterly Emissions Report for the Facility and Monitoring Location(s) listed in Table 1 below. The Table also provides confirmation of EPA`s receipt (Date, Time, etc.) of your submission. Prior to submission ECMPS evaluated your emissions report and assigned an overall "Feedback Status Level" to it, based on the results (see Table 1). This Feedback Report also contains Table 2, which displays EPA-Accepted Cumulative Values for emissions and other parameters.

Table 1: Submission Receipt and Feedback Status Level Information

Report Received for Facility ID (ORIS Code):	55393
Facility Name:	Metcalf Energy Center
State:	CA
Monitoring Locations:	1
Submission Type:	EM for 2025 QTR 4
Feedback Status Level:	No Errors
Submission Date/Time:	01/09/2026 12:53:48 PM
Submitter User ID:	rsilva
Submission ID:	1813094
Resubmission Required:	No
EPA Analyst:	Bryan Ramirez; (202) 564-7591; ramirez.bryan@epa.gov

EXPLANATION OF YOUR FEEDBACK STATUS LEVEL LISTED IN TABLE 1

The EPA has accepted your Emissions data submission. ECMPS detected no errors in your data based on the checks performed. NOTE: The ECMPS submission access window for this Emissions report has been closed. If you need to resubmit this data, please see the DATA RESUBMISSION guidance, below.

OTHER INFORMATION AND BULLETINS FROM EPA

QUESTIONS: Please contact your EPA Analyst listed in Table 1 with any questions regarding this submission and the evaluation results. If you need assistance with correcting problems in the Emissions data for this facility, please send an email to ECMPS Technical Support at: ecmps-support@camdsupport.com.

DATA RESUBMISSION: If you need to resubmit emissions data, including for previous calendar quarters, please complete the ECMPS Data Resubmission Request Form located at: https://ecmps.camdsupport.com/help_resubmit_form.shtml. Please provide detailed documentation of the reasons for the resubmission. Support staff will review your request and notify you via e-mail when the necessary database access window has been granted for your resubmission.

ECMPS Data Reporting Instructions: for detailed information about reporting Monitoring Plan, QA/Certification Test, and Emissions data, please see the ECMPS Reporting Instructions on EPA`s website at: https://www.epa.gov/power-sector/ecmps-reporting-instructions.

If you have any questions regarding this correspondence, please feel free to contact your EPA Analyst listed in Table 1 as soon as possible. Thank you for your attention to this matter.

Table 2: Cumulative Data Summary -- EPA-Accepted Values

Unit/Stack/Pipe ID: 1

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Ozone Season	Year-to-Date
Number of Operating Hours	1,450	433	1,551	1,276		4,710
Operating Time (hrs)	1,403.89	404.73	1,537.63	1,240.99		4,587.24
SO2 Mass (tons)	0.7	0.2	0.8	0.7		2.4
CO2 Mass (tons)	148,048.9	41,662.9	166,445.7	134,360.5		490,518.0
Heat Input (mmBtu)	2,491,234	701,059	2,800,745	2,260,873		8,253,911
NOx Emission Rate (lb/mmBtu)	0.010	0.013	0.007	0.009		0.009

Re: Metcalf Energy Center (55393) - 2

Dear Certifying Official:

Thank you for submitting your Quarterly Emissions Report using the U. S. EPA`s Emissions Collection and Monitoring Plan System (ECMPS) software. This ECMPS Feedback report provides you with a detailed submission receipt, a summary of the evaluations performed on your submission, and guidance on any follow-up actions needed if any errors were found. EPA has also received a copy of this Feedback Report as part of your submission.

SUBMISSION STATUS

The EPA has received your Quarterly Emissions Report for the Facility and Monitoring Location(s) listed in Table 1 below. The Table also provides confirmation of EPA`s receipt (Date, Time, etc.) of your submission. Prior to submission ECMPS evaluated your emissions report and assigned an overall "Feedback Status Level" to it, based on the results (see Table 1). This Feedback Report also contains Table 2, which displays EPA-Accepted Cumulative Values for emissions and other parameters.

Table 1: Submission Receipt and Feedback Status Level Information

Report Received for Facility ID (ORIS Code):	55393
Facility Name:	Metcalf Energy Center
State:	CA
Monitoring Locations:	2
Submission Type:	EM for 2025 QTR 4
Feedback Status Level:	No Errors
Submission Date/Time:	01/09/2026 12:54:26 PM
Submitter User ID:	rsilva
Submission ID:	1813099
Resubmission Required:	No
EPA Analyst:	Bryan Ramirez; (202) 564-7591; ramirez.bryan@epa.gov

EXPLANATION OF YOUR FEEDBACK STATUS LEVEL LISTED IN TABLE 1

The EPA has accepted your Emissions data submission. ECMPS detected no errors in your data based on the checks performed. NOTE: The ECMPS submission access window for this Emissions report has been closed. If you need to resubmit this data, please see the DATA RESUBMISSION guidance, below.

OTHER INFORMATION AND BULLETINS FROM EPA

QUESTIONS: Please contact your EPA Analyst listed in Table 1 with any questions regarding this submission and the evaluation results. If you need assistance with correcting problems in the Emissions data for this facility, please send an email to ECMPS Technical Support at: ecmps-support@camdsupport.com.

DATA RESUBMISSION: If you need to resubmit emissions data, including for previous calendar quarters, please complete the ECMPS Data Resubmission Request Form located at: https://ecmps.camdsupport.com/help_resubmit_form.shtml. Please provide detailed documentation of the reasons for the resubmission. Support staff will review your request and notify you via e-mail when the necessary database access window has been granted for your resubmission.

ECMPS Data Reporting Instructions: for detailed information about reporting Monitoring Plan, QA/Certification Test, and Emissions data, please see the ECMPS Reporting Instructions on EPA`s website at: https://www.epa.gov/power-sector/ecmps-reporting-instructions.

If you have any questions regarding this correspondence, please feel free to contact your EPA Analyst listed in Table 1 as soon as possible. Thank you for your attention to this matter.

Table 2: Cumulative Data Summary -- EPA-Accepted Values

Unit/Stack/Pipe ID: 2

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Ozone Season	Year-to-Date
Number of Operating Hours	1,286	940	1,712	1,130		5,068
Operating Time (hrs)	1,232.85	881.37	1,686.79	1,106.04		4,907.05
SO2 Mass (tons)	0.7	0.5	0.9	0.6		2.7
CO2 Mass (tons)	133,225.2	90,145.6	182,129.7	119,358.8		524,859.3
Heat Input (mmBtu)	2,241,767	1,516,886	3,064,679	2,008,447		8,831,779
NOx Emission Rate (lb/mmBtu)	0.010	0.013	0.008	0.008		0.010

Appendix 6

Jacobs

Memorandum

2101 Webster Street
Suite 1410
155 Grand Avenue
Suite 800
Oakland, CA 94612
United States
T +1.510.251.2426
www.jacobs.com

Subject	**Metcalf Energy Center – Year 2026 Annual Compliance Report for Biological Resources (COC BIO-2)**
Facility Name	Metcalf Energy Center
Attention	Rosemary Silva/Calpine
From	Scott Lindemann/Jacobs
Date	July 9, 2026
Copies to	Kevin Fisher/Jacobs

1. Introduction

This Metcalf Energy Center (MEC) Year 2026 Annual Compliance Report for Biological Resources fulfills the California Energy Commission (CEC) requirement for Condition of Certification (COC) BIO-2, "Designated Biologist Duties." BIO-2 states that the Designated Biologist (DB) will perform the stated duties of BIO-2 relating to "any site (or related facilities) mobilization, ground disturbance, grading, construction, operation, and closure activities." In support of COC BIO-2, the DB is required to maintain written records of the tasks specified previously and those included in the Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP). Summaries of these records will be submitted in the annual compliance report.

The BRMIMP for the MEC was prepared in July 2001 as required under the COC BIO-4 set forth by the CEC in their final decision dated October 1, 2001 (99-AFC-3). The purpose of the BRMIMP is to ensure that actions authorized, funded, or carried out by state or federal lead agencies are not likely to jeopardize the continued existence of endangered, threatened, or other special-status species. The BRMIMP describes mitigation measures and guidance to protect biological resources within the project area.

2. Project Location

The MEC is a 600-megawatt natural gas-fired combined cycle power plant operated by Calpine. The MEC is located at the southern edge of the City of San Jose in Santa Clara County. Specifically, the 14.2-acre site is located on the northwestern portion of the Morgan Hill United States Geological Survey quadrangle (Township 8S, Range 2E). The site comprises a 10.9-acre footprint and 3.3-acre riparian corridor. Monterey Road and the Union Pacific Railroad immediately border the MEC site on the east, and farmed agricultural land borders the MEC site to the south. Site access is currently from a railroad overcrossing off Monterey Road, between Metcalf Road to the north and Blanchard Road to the south.

3. Monitored Activities

Since the MEC became operational, Calpine has complied with applicable CEC COCs and periodically consulted with the DB. This 2026 reporting period covers January 2025 through December 2025. The

monitoring and compliance efforts for the subject year are documented further in this section and in Attachment 1 – Site Photographs.

A biological site walkthrough was completed by CEC-approved DB Scott Lindemann (Jacobs) on May 27, 2026. The purpose of the site walkthrough was to identify biological concerns and carry out a general monitoring survey.

During the biological site walkthrough, ground squirrel (*Otospermophilus beecheyi*) burrows were recorded along the northern boundary of the detention pond within the MEC site. While suitable burrows were observed, evidence of occupancy by western burrowing owl (*Athene cunicularia hypugaea*), such as feathers and whitewash, was not detected.

Calpine staff noted that a rock pigeon (*Columba livia*) infestation occurred in approximately 2016, which resulted in excessive fecal waste presenting hazardous conditions to employees. As such, a falconer was employed to control the rock pigeon population on site. The falconer was not active during the 2026 reporting period. No rock pigeon infestation has occurred since these abatement measures were introduced. It is noted that rock pigeon is not afforded protection under the Migratory Bird Treaty Act of 1918 (*United States Code* Title 16, Sections 703–712).

The DB verified that all site personnel are provided training regarding the protected species that may be present in or around the MEC. The training materials have not changed in the time since they were included in the 2025 year report; therefore, they are not included again here.

4. Conclusion

The MEC has demonstrated continued compliance with biological mitigation and protection measures included in the COCs and BRMIMP that are applicable to operation of the facility for the period of January 2025 through December 2025. The DB will remain available to assist with any investigation and biological compliance issues that may arise.

Jacobs

Memorandum

Metcalf Energy Center – Year 2026 Annual Compliance Report for Biological Resources (COC BIO-2)

Attachment 1 Site Photographs



Photograph 1. Trees along southern boundary of the MEC site.



Photograph 2. Southwest site boundary of the MEC site.



Photograph 3. Detention pond in southwest area of the MEC site.



Photograph 4. Built infrastructure within the MEC site.



Photograph 5. Boundary treatment along the western site boundary of MEC.

Appendix 7

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Aqueous Ammonia Storage Area**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**AMMONIA** CAS No 7664-41-7 ✓EHS Map: 1 Grid: 4G	**Pounds** State Liquid Type Mixture	**27527.7** Storage Container Aboveground Tank Days on Site: 365	**32382**	27527.7 Pressue Ambient Temperature Ambient	Waste Code	- Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	Ammonia	28%	✓	7664-41-7

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **AUXILIARY TRANSFORMER 1A**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	HYTRANS 61	**Gallons**	**489**	**489**	489		- Health	OIL, HYDRO LIGHT NAPH DIST	99%		64742-53-6
	CAS No	State: Liquid	Storage Container: Other		Pressue: < Ambient	Waste Code	Aspiration Hazard	2, 6-DI-T-BUTYL-P-CRESOL (BHT)	1%		128-37-0
	Map: 1 Grid: 3D	Type: Mixture	Days on Site: 365		Temperature: Ambient						
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED**	**Cu. Feet**	**304**	**304**	304		- Physical Gas Under Pressure - Health Respiratory Skin Sensitization				
	CAS No: 7727-37-9	State: Gas	Storage Container: Cylinder		Pressue:	Waste Code					
	Map: 1 Grid: 3D	Type: Pure	Days on Site: 365		Temperature:						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **AUXILIARY TRANSFORMER 1B**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	HYTRANS 61	**Gallons**	**489**	**489**	489		- Health	OIL, HYDRO LIGHT NAPH DIST	99%		64742-53-6
	CAS No	State: Liquid	Storage Container: Other		Pressue: < Ambient	Waste Code	Aspiration Hazard	2, 6-DI-T-BUTYL-P-CRESOL (BHT)	1%		128-37-0
	Map: 1 Grid: 5E	Type: Mixture	Days on Site: 365		Temperature: Ambient						
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED**	**Cu. Feet**	**304**	**304**	304		- Physical Gas Under Pressure - Health Respiratory Skin Sensitization				
	CAS No: 7727-37-9	State: Gas	Storage Container: Cylinder		Pressue: Ambient	Waste Code					
	Map: 1 Grid: 1D	Type: Pure	Days on Site: 365		Temperature: Ambient						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **AUXILIARY TRANSFORMER 2A**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
	HYTRANS 61	**Gallons**	**489**	**489**	489		- Health	OIL, HYDRO LIGHT NAPH DIST	99%		64742-53-6
	CAS No	State / Storage Container			Pressue	Waste Code	Aspiration Hazard	2, 6-DI-T-BUTYL-P-CRESOL (BHT)	1%		128-37-0
		Liquid / Other			< Ambient						
	Map: 1 Grid: 5E	Type			Temperature						
		Mixture / Days on Site: 365			Ambient						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **AUXILIARY TRANSFORMER 2B**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	HYTRANS 61	**Gallons**	**489**	**489**	489		- Health	OIL, HYDRO LIGHT NAPH DIST	99%		64742-53-6
	CAS No	State: Liquid	Storage Container: Other		Pressue: Ambient	Waste Code	Aspiration Hazard	2, 6-DI-T-BUTYL-P-CRESOL (BHT)	1%		128-37-0
	Map: 1 Grid: 1D	Type: Mixture	Days on Site: 365		Temperature: Ambient						
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED**	**Cu. Feet**	**304**	**304**	304		- Physical Gas Under Pressure - Health Respiratory Skin Sensitization				
	CAS No: 7727-37-9	State: Gas	Storage Container: Cylinder		Pressue: Ambient	Waste Code					
	Map: 1 Grid: 5E	Type: Pure	Days on Site: 365		Temperature: Ambient						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **BALANCE OF PLANT (POWERSAFE GC-M 60 UNITS)**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**LEAD-ACID BATTERY** CAS No Map: 1 Grid: 2E	**Gallons** State: Liquid Type: Pure	**865** Storage Container: Other Days on Site: 365	**14.4**	865 Pressue: Ambient Temperature: Ambient	Waste Code		LEAD, LEAD COMPONENTS	60%		7439-92-1
								SULFURIC ACID	30%	✓	7664-93-9

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **BOILER FEED PUMPS**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials	**CONOCO PHILLIPS MEGA FLOW 32** CAS No Map: 1 Grid: 2H, 3H	**Gallons** State Liquid Type Mixture	**520** Storage Container Other Days on Site: 365	**130**	520 Pressue Ambient Temperature Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Respiratory Skin Sensitization				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Boiler Water Chemical Treatment Area**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
	CHEMTREAT BL-152 CAS No Map: 1 Grid: 2G	**Gallons** State: Liquid Type: Mixture	**400** Storage Container: Tote Bin Days on Site: 365	**400**	400 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	AMMONIUM HYDROXIDE ETHANOLAMINE	30% 10%		1336-21-6 141-43-5
DOT: 8 - Corrosives (Liquids and Solids)	**CHEMTREAT BL1794** CAS No Map: 1 Grid: 2G	**Gallons** State: Liquid Type: Mixture	**400** Storage Container: Tote Bin Days on Site: 365	**400**	340 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	Sodium phosphate, tribasic	5%		7601-54-9
	CHEMTREAT BL-8401 CAS No Map: 1 Grid: 2G	**Gallons** State: Liquid Type: Mixture	**400** Storage Container: Aboveground Tank Days on Site: 365	**400**	400 Pressue: Temperature:	Waste Code	- Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location
Combustion Turbine Lube Oil

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids Combustible Liquid, Class III-B	**76 TURBINE OIL 68** CAS No Map: 1 Grid: 2E, 4E	**Gallons** State: Solid Type: Mixture	**7200** Storage Container: Other Days on Site: 365	**3600**	7200 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Serious Eye Damage Eye Irritation				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Connex Near Storm Water Pond**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	Sodium Carbonate CAS No 497-19-8 Map: 1 Grid: 6K	**Pounds** State Solid Type Pure	**300** Storage Container Bag Days on Site: 365	**50**	300 Pressue Ambient Temperature Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Cooling Tower Chemical Treatment Area**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials	**CHEMTREAT CL243** CAS No NA Map: 1 Grid: 5D	**Gallons** State Liquid Type Mixture	**1500** Storage Container Aboveground Tank Days on Site: 365	**1500**	1350 Pressue Ambient Temperature Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified				
DOT: 9 - Misc. Hazardous Materials	**CHEMTREAT CL4500** CAS No Map: 1 Grid: 5D	**Gallons** State Liquid Type Mixture	**1500** Storage Container Aboveground Tank Days on Site: 365	**1500**	750 Pressue Ambient Temperature Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Respiratory Skin Sensitization - Health Aspiration Hazard				
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**SODIUM HYPOCHLORITE 12.5%** CAS No Map: 1 Grid: 5D	**Gallons** State Liquid Type Mixture	**8000** Storage Container Aboveground Tank Days on Site: 365	**8000**	6800 Pressue Ambient Temperature Ambient	Waste Code	- Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	SODIUM HYDROXIDE SODIUM HYPOCHLORITE >12.5%-15% SODIUM CHLORIDE WATER	1% 13%		1310-73-2 7681-52-9 7647-14-5 7732-18-5
DOT: 8 - Corrosives (Liquids and Solids) Corrosive, Water Reactive, Class 1	**SULFURIC ACID 93%** CAS No ✔EHS 7664-93-9 Map: 1 Grid: 5D	**Pounds** State Liquid Type Pure	**42762.8** Storage Container Aboveground Tank Days on Site: 365	**85526**	42762.8 Pressue Ambient Temperature Ambient	Waste Code	- Physical Corrosive To Metal - Physical Contact Water Emits Flammable Gas - Health Skin Corrosion Irritation				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **CT #1, (60 TOTAL POWERSAFE EC BATTERIES)**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids)	**LEAD-ACID BATTERY**	**Gallons**	**324**	**2.7**	324			LEAD, LEAD COMPONENTS	60%		7439-92-1
	CAS No	State: Liquid	Storage Container: Other		Pressue: Ambient	Waste Code		SULFURIC ACID	30%	✓	7664-93-9
Corrosive	Map: 1 Grid: 4E	Type: Pure	Days on Site: 365		Temperature: Ambient						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **CT #2, (60 TOTAL POWERSAFE EC BATTERIES)**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**LEAD-ACID BATTERY** CAS No Map: 1 Grid: 2E	**Gallons** State: Liquid Type: Pure	**324** Storage Container: Other Days on Site: 365	**2.7**	324 Pressue: Ambient Temperature: Ambient	Waste Code		LEAD, LEAD COMPONENTS	60%		7439-92-1
								SULFURIC ACID	30%	✓	7664-93-9

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **CT CONTROL OIL TANK**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids	**MOBIL DTE 26** CAS No Map: 1 Grid: 2F, 3F	**Gallons** State Liquid Type Pure	**200** Storage Container Other Days on Site: 365	**100**	200 Pressue Ambient Temperature Ambient	Waste Code	- Physical Flammable - Health Respiratory Skin Sensitization				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **CT WASH WATER SUMP**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials	**CT WATER WASH**	**Gallons**	**3200**	**1600**	3200						
	CAS No	State: Liquid	Storage Container: Other		Pressue: Ambient	Waste Code					
	Map: F2 Grid: F3	Type: Mixture	Days on Site: 365		Temperature: < Ambient						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **CYLINDER GAS STORAGE**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**ARGON, COMPRESSED** CAS No 7440-37-1 Map: 1 Grid: H3	**Cu. Feet** State Gas Type Pure	**625** Storage Container Cylinder Days on Site: 365	**336**	586 Pressue Temperature	Waste Code	- Physical Gas Under Pressure - Health Hazard Not Otherwise Classified				
DOT: 2.2 - Nonflammable Gases	**ARGON/CARBON MONOXIDE** CAS No Map: 1 Grid: H3	**Cu. Feet** State Gas Type Mixture	**752** Storage Container Cylinder Days on Site: 365	**376**	376 Pressue Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure				
DOT: 2.2 - Nonflammable Gases	**CALIBRATION GAS (NITROGEN, CARBON MONOXIDE)** CAS No Map: 1 Grid: 3H	**Cu. Feet** State Gas Type Mixture	**580** Storage Container Cylinder Days on Site: 365	**145**	580 Pressue < Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Simple Asphyxiant	NITROGEN OXYGEN CARBON MONOXIDE	83% 12% 5%		7727-37-9 7782-44-7 124-38-9
DOT: 2.2 - Nonflammable Gases	**HELIUM** CAS No 7440-59-7 Map: 1 Grid: 3H	**Cu. Feet** State Gas Type Pure	**876** Storage Container Cylinder	**292**	584 Pressue Temperature	Waste Code	- Physical Gas Under Pressure - Health Aspiration Hazard				
DOT: 2.2 - Nonflammable Gases	**NITROGEN / NITRIC OXIDE CALIBRATION GAS** CAS No Map: 1 Grid: 3H	**Cu. Feet** State Gas Type Mixture	**1450** Storage Container Cylinder Days on Site: 365	**145**	1160 Pressue Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity	NITRIC OXIDE NITROGEN	0% 99%	✓	10102-43-9 7727-37-9
DOT: 2.2 - Nonflammable Gases	**NITROGEN / OXYGEN CALIBRATION GAS** CAS No Map: 1 Grid: 3H	**Cu. Feet** State Gas Type	**870** Storage Container Cylinder Days on Site: 365	**145**	870 Pressue Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Health Acute Toxicity - Health Serious Eye Damage Eye Irritation - Health Simple Asphyxiant				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **CYLINDER GAS STORAGE**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED** CAS No 7727-37-9 Map: 1 Grid: 3H	**Cu. Feet** State Gas Type Pure	**8050** Storage Container Cylinder Days on Site: 365	**230**	8050 Pressue < Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Health Serious Eye Damage Eye Irritation				
DOT: 2.2 - Nonflammable Gases Oxidizing, Class 2	**OXYGEN** CAS No 7782-44-7 Map: 1 Grid: H3	**Cu. Feet** State Gas Type Pure	**843** Storage Container Cylinder Days on Site: 365	**281**	562 Pressue Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Physical Oxidizer				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **DIESEL FIRE PUMP HOUSE (4 TOTAL DURACELL BATTERIES)**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**LEAD-ACID BATTERY** CAS No Map: 1 Grid: 5I	**Gallons** State Liquid Type Mixture	**12** Storage Container Other Days on Site: 365	**6**	12 Pressue Ambient Temperature Ambient	Waste Code 792	- Physical Flammable - Physical Explosive - Physical Corrosive To Metal - Health Carcinogenicity - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity	Sulfuric Acid Lead, Lead Components	40% 60%	✓	7664-93-9 7439-92-1

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Fire Pump House**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-B	**DIESEL** CAS No 68334-30-5 Map: 1 Grid: 5I	**Gallons** State Liquid Type Mixture	**572** Storage Container Aboveground Tank Days on Site: 365	**572**	550 Pressue Ambient Temperature Ambient	Waste Code	- Physical Flammable - Health Acute Toxicity - Health Respiratory Skin Sensitization - Health Aspiration Hazard	FUELS, DIESEL, NO. 2 GAS OIL, LIGHT HYDRODESULFURIZED MIDDLE DISTILLATE	100% 0%		 64741-44-2 64742-80-9

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **FUEL GAS COMPRESSORS**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials	**LUBRICATING OIL** CAS No Map: 1 Grid: 5J, 6J	**Gallons** State: Liquid Type: Mixture	**135** Storage Container: Other Days on Site: 365	**45**	135 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Respiratory Skin Sensitization				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **GSU TRANSFORMERS**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids	**HYTRANS 61** CAS No Map: 1 Grid: 2D, 3D, 4E	**Gallons** State: Liquid Type: Mixture	**47883** Storage Container: Other Days on Site: 365	**18345**	47883 Pressue: < Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation	OIL, HYDRO LIGHT NAPH DIST 2, 6-DI-T-BUTYL-P-CRESOL (BHT)	99% 1%		64742-53-6 128-37-0

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Hazardous Material Storage Area**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 4.1 - Flammable Solids Flammable Liquid, Class I-C	**DEBRIS/RAGS CONTAMINATED WITH PETROLEUM/OIL** CAS No Map: 1 Grid: 5G, 5H	**Pounds** State: Solid Type: Waste	**100** Storage Container: Steel Drum Days on Site: 365	**55**	25 Pressue: Ambient Temperature: Ambient	500 Waste Code: 352	- Physical Flammable - Health Hazard Not Otherwise Classified				
	USED OIL CAS No NA Map: 1 Grid: 5G, 5H	**Gallons** State: Liquid Type: Waste	**400** Storage Container: Tote Bin Days on Site: 365	**400**	200 Pressue: Ambient Temperature: Ambient	660 Waste Code: 221	- Physical Combustible Dust - Health Hazard Not Otherwise Classified				
Flammable Solid	**USED OIL FILTERS** CAS No Map: 1 Grid: 5G, 5H	**Pounds** State: Solid Type: Waste	**100** Storage Container: Steel Drum Days on Site: 365	**100**	25 Pressue: Ambient Temperature: Ambient	200 Waste Code:	- Physical Flammable - Health Hazard Not Otherwise Classified				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Lube Oil Storage**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	76 Triton 5005 GEO SAE 30 CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**110** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Skin Corrosion Irritation				
DOT: 3 - Flammable and Combustible Liquids	**76 TURBINE OIL 68** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**220** Storage Container: Steel Drum Days on Site: 365	**55**	220 Pressue: Ambient Temperature: Ambient	Waste Code					
	FYRQUEL EHC PLUS CAS No Map: 1 Grid: H5	**Gallons** State: Liquid Type: Mixture	**110** Storage Container: Steel Drum Days on Site: 365	**55**	110 Pressue: Temperature:	0 Waste Code	- Health Acute Toxicity				
Flammable Liquid, Class I-A	**Megaflow AW HVI Hydraulic Oil** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**55** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified				
DOT: 3 - Flammable and Combustible Liquids	**MISCELLANEOUS LUBE OIL** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**220** Storage Container: Carboy Days on Site: 365	**5**	185 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Respiratory Skin Sensitization				
Flammable Liquid, Class I-B	**MOBIL DTE 26** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Pure	**110** Storage Container: Steel Drum Days on Site: 365	**55**	110 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified				
Flammable Liquid, Class I-B	**MULTIPURPOSE R+O OIL 220** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**165** Storage Container: Steel Drum Days on Site: 365	**55**	165 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified	LUBRICANT BASE OIL ADDITIVES	99% 1%		

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Lube Oil Storage**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	Phillips Turbine Oil 100 CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**165** Storage Container: Steel Drum Days on Site: 365	**55**	110 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified				
DOT: 9 - Misc. Hazardous Materials	**Release Number 1 VOC** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**55** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization				
	Reolube HYD 46 CAS No 107028-44-4 Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Pure	**110** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified				
DOT: 9 - Misc. Hazardous Materials	**Shell Morlina S3 BA 220** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**220** Storage Container: Steel Drum Days on Site: 365	**55**	165 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Skin Corrosion Irritation				
	SHELL TELLUS OIL CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Pure	**110** Storage Container: Steel Drum Days on Site: 365	**55**	110 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Serious Eye Damage Eye Irritation				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Lube Oil Storage**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials	**Shell Turbo Oil DR 46** CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**55** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Carcinogenicity - Health Reproductive Toxicity - Health Respiratory Skin Sensitization - Health Specific Target Organ Toxicity - Health Aspiration Hazard				
	TURBO T OIL 32 CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Pure	**385** Storage Container: Steel Drum Days on Site: 365	**55**	330 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified				
	Vaprotec Light CAS No Map: 1 Grid: 5H	**Gallons** State: Liquid Type: Mixture	**55** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **MAINTENANCE SHOP**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-B	***MISCELLANEOUS FLAMMABLE LIQUID, CLASS IB** CAS No Map: 1 Grid: 3J	**Gallons** State: Liquid Type: Pure	**65** Storage Container: Can, Glass Bottle or Jug, Plastic Bottle or Jug Days on Site: 365	**1**	65 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation				
DOT: 2.1 - Flammable Gases Unstable (Reactive), Class 2, Flammable Gas	**ACETYLENE** CAS No 74-86-2 Map: 1 Grid: 3J	**Cu. Feet** State: Gas Type: Pure	**185** Storage Container: Cylinder Days on Site: 365	**185**	185 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Physical Gas Under Pressure - Health Aspiration Hazard				
DOT: 2.2 - Nonflammable Gases	**ARGON / CARBON DIOXIDE** CAS No Map: 1 Grid: 3J	**Cu. Feet** State: Gas Type: Mixture	**501** Storage Container: Cylinder Days on Site: 365	**376**	501 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Simple Asphyxiant				
DOT: 2.2 - Nonflammable Gases	**ARGON, COMPRESSED** CAS No 7440-37-1 Map: 1 Grid: 3J	**Cu. Feet** State: Gas Type: Pure	**336** Storage Container: Cylinder Days on Site: 365	**336**	336 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Hazard Not Otherwise Classified				
DOT: 2.2 - Nonflammable Gases	**CARBON DIOXIDE** CAS No 124-38-9 Map: 1 Grid: 3J	**Cu. Feet** State: Gas Type: Pure	**576** Storage Container: Cylinder Days on Site: 365	**144**	576 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Acute Toxicity - Health Simple Asphyxiant				
	HYDRO HEAT CAS No Map: 1 Grid: 3J	**Gallons** State: Liquid Type: Mixture	**55** Storage Container: Other Days on Site: 365	**35**	55 Pressue: Ambient Temperature: Ambient	140 Waste Code	- Physical Flammable - 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. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **MAINTENANCE SHOP**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases Oxidizing, Class 2	**OXYGEN** CAS No 7782-44-7 Map: 1 Grid: 3J	**Cu. Feet** State Gas Type Pure	**281** Storage Container Cylinder Days on Site: 365	**281**	281 Pressue Ambient Temperature Ambient	Waste Code	- Physical Oxidizer - Health Hazard Not Otherwise Classified				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **OIL/WATER SEPARATOR**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials Toxic	**USED OIL** CAS No 70514-12-4 Map: 5 Grid: C	**Gallons** State Liquid Type Waste	**600** Storage Container Aboveground Tank Days on Site: 365	**600**	600 Pressue Ambient Temperature Ambient	500 Waste Code 352	- Physical Flammable - Health Respiratory Skin Sensitization				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **PROPANE STORAGE**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-B	***MISCELLANEOUS FLAMMABLE LIQUID, CLASS IB** CAS No Map: 1 Grid: 3H	**Gallons** State: Liquid Type: Pure	**55** Storage Container: Can, Plastic Bottle or Jug Days on Site: 365	**1**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Acute Toxicity - Health Serious Eye Damage Eye Irritation				
DOT: 2.1 - Flammable Gases Flammable Liquid, Class I-A	**PROPANE** CAS No 74-98-6 Map: 1 Grid: 3H	**Cu. Feet** State: Gas Type: Pure	**225** Storage Container: Cylinder Days on Site: 365	**15**	150 Pressue: < Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Physical Gas Under Pressure - Health Aspiration Hazard				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **STATION SERVICE TRANSFORMER 1A**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	HYTRANS 61	**Gallons**	**3519**	**3519**	3519		- Health	OIL, HYDRO LIGHT NAPH DIST	99%		64742-53-6
	CAS No	State: Liquid	Storage Container: Other		Pressue: Ambient	Waste Code	Aspiration Hazard	2, 6-DI-T-BUTYL-P-CRESOL (BHT)	1%		128-37-0
	Map: 1 Grid: 3E	Type: Mixture	Days on Site: 365		Temperature: Ambient						
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED**	**Cu. Feet**	**230**	**230**	230		- Physical Gas Under Pressure - Health Respiratory Skin Sensitization				
	CAS No: 7727-37-9	State: Gas	Storage Container: Cylinder		Pressue	Waste Code					
	Map: 1 Grid: 3E	Type: Pure	Days on Site: 365		Temperature						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **STATION SERVICE TRANSFORMER 1B**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	HYTRANS 61	**Gallons**	**3519**	**3519**	3519		- Health	OIL, HYDRO LIGHT NAPH DIST	99%		64742-53-6
	CAS No	State: Liquid	Storage Container: Other		Pressue: Ambient	Waste Code	Aspiration Hazard	2, 6-DI-T-BUTYL-P-CRESOL (BHT)	1%		128-37-0
	Map: 1 Grid: 2E	Type: Mixture	Days on Site: 365		Temperature: Ambient						
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED**	**Pounds**	**230**	**230**	230		- Physical Gas Under Pressure				
	CAS No: 7727-37-9	State: Gas	Storage Container: Cylinder		Pressue: Ambient	Waste Code					
	Map: 1 Grid: 3E	Type: Pure	Days on Site: 365		Temperature: Ambient						

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **STEAM TURBINE CONTROL OIL TANK**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials	**Shell Turbo Oil DR 46** CAS No Map: 1 Grid: 4F	**Gallons** State: Liquid Type: Mixture	**200** Storage Container: Other Days on Site: 365	**200**	200 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Respiratory Skin Sensitization				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Steam Turbine Flammable Locker**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-B	***MISCELLANEOUS FLAMMABLE LIQUID, CLASS IB** CAS No Map: 1 Grid: 4E	**Gallons** State: Liquid Type: Pure	**210** Storage Container: Can, Glass Bottle or Jug, Plastic Bottle or Jug Days on Site: 365	**1**	210 Pressue: Ambient Temperature: Ambient	Waste Code					
DOT: 3 - Flammable and Combustible Liquids Combustible Liquid, Class II	**DIESEL FUEL** CAS No 68334-30-5 Map: 1 Grid: 4F	**Gallons** State: Liquid Type: Pure	**20** Storage Container: Can, Cylinder Days on Site: 365	**5**	10 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization				
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-B	**GASOLINE** CAS No 8006-61-9 Map: 1 Grid: 4F	**Gallons** State: Liquid Type: Pure	**70** Storage Container: Can Days on Site: 365	**5**	70 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - 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				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **STEAM TURBINE PACKAGE**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids	**CONOCO PHILLIPS TURBINE OIL 32** CAS No Map: 1 Grid: 4G	**Gallons** State Liquid Type Mixture	**6850** Storage Container Other Days on Site: 365	**6650**	6850 Pressue Ambient Temperature Ambient	Waste Code	- Physical Flammable - Health Hazard Not Otherwise Classified	TERT-BUTYLATED TRIPHENYL PHOSPHATES TRIPHENYL PHOSPHATE			68937406 115-86-6

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **Steam Turbine Under Deck**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
	DIESEL EXHAUST FLUID CAS No Map: 1 Grid: F4	**Gallons** State: Liquid Type: Mixture	**45** Storage Container: Other	**2.5**	30 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Skin Corrosion Irritation				
	DOLOMITIC HYDRATED LIME CAS No Map: 1 Grid: F4	**Pounds** State: Solid Type: Mixture	**250** Storage Container: Bag Days on Site: 365	**50**	200 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity				
	FYRQUEL EHC PLUS CAS No Map: 1 Grid: F4	**Gallons** State: Liquid Type: Mixture	**110** Storage Container: Steel Drum Days on Site: 365	**55**	110 Pressue: Temperature:	0 Waste Code	- Health Acute Toxicity				
DOT: 9 - Misc. Hazardous Materials	**MOBIL DTE 26** CAS No Map: 1 Grid: H5	**Gallons** State: Liquid Type: Mixture	**55** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Respiratory Skin Sensitization				
	Shell Morlina S3 BA 220 CAS No Map: 1 Grid: f4	**Gallons** State: Liquid Type: Mixture	**110** Storage Container: Steel Drum Days on Site: 365	**55**	110 Pressue: Ambient Temperature: Ambient	0 Waste Code	- Health Acute Toxicity - Health Aspiration Hazard				
	SHELL TURBO OIL T 32 CAS No Map: 1 Grid: F4	**Gallons** State: Liquid Type: Mixture	**475** Storage Container: Steel Drum Days on Site: 365	**250**	475 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Hazard Not Otherwise Classified				
DOT: 3 - Flammable and Combustible Liquids Combustible Liquid, Class II	**USED OIL** CAS No NA Map: 1 Grid: F4	**Gallons** State: Liquid Type: Waste	**200** Storage Container: Tote Bin Days on Site: 365	**300**	100 Pressue: Ambient Temperature: Ambient	660 Waste Code 221	- Physical Hazard Not Otherwise Classified - Health Respiratory Skin Sensitization				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **SWITCHYARD**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**SULFUR HEXAFLUORIDE** CAS No 2551-62-4 Map: 1 Grid: 4B	**Cu. Feet** State Gas Type Pure	**2970** Storage Container Other Days on Site: 365	**594**	2970 Pressue < Ambient Temperature Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Simple Asphyxiant				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **SWITCHYARD (60 TOTAL C&D FLOODED BATTERIES)**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**FLOODED LEAD-CALCIUM BATTERY** CAS No Map: 1 Grid: 4B	**Gallons** State: Liquid Type: Pure	**36** Storage Container: Other Days on Site: 365	**0.6**	36 Pressue: Ambient Temperature: Ambient	Waste Code		LEAD, LEAD COMPONENTS	65%		7439-92-1
								SULFURIC ACID	8%	✓	7664-93-9

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **UNIT 1 CEMS GASES**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**NITROGEN / NITRIC OXIDE CALIBRATION GAS** CAS No Map: 1 Grid: 4H	**Cu. Feet** State: Gas Type: Mixture	**725** Storage Container: Cylinder Days on Site: 365	**145**	435 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity	NITRIC OXIDE NITROGEN	0% 99%	✓	10102-43-9 7727-37-9
DOT: 2.2 - Nonflammable Gases	**NITROGEN / OXYGEN CALIBRATION GAS** CAS No Map: 1 Grid: 4H	**Cu. Feet** State: Gas Type:	**580** Storage Container: Cylinder Days on Site: 365	**145**	580 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Acute Toxicity - Health Serious Eye Damage Eye Irritation - Health Simple Asphyxiant				
DOT: 2.2 - Nonflammable Gases	**NITROGEN/CARBON MONOXIDE CALIBRATION GAS** CAS No Map: 1 Grid: 4H	**Cu. Feet** State: Gas Type: Mixture	**280** Storage Container: Cylinder Days on Site: 365	**145**	280 Pressue: < Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Simple Asphyxiant	NITROGEN OXYGEN CARBON MONOXIDE	83% 12% 5%		7727-37-9 7782-44-7 124-38-9

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **UNIT 1 NITROGEN STORAGE**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED** CAS No 7727-37-9 Map: 1 Grid: 3E	**Cu. Feet** State Gas Type Pure	**1380** Storage Container Cylinder Days on Site: 365	**230**	1380 Pressue < Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Health Serious Eye Damage Eye Irritation				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **UNIT 2 CEMS GASES**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**NITROGEN / NITRIC OXIDE CALIBRATION GAS** CAS No Map: 1 Grid: 2H	**Cu. Feet** State: Gas Type: Mixture	**725** Storage Container: Cylinder Days on Site: 365	**145**	725 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity	NITRIC OXIDE NITROGEN	0% 99%	✓	10102-43-9 7727-37-9
DOT: 2.2 - Nonflammable Gases	**NITROGEN / OXYGEN CALIBRATION GAS** CAS No Map: 1 Grid: 2H	**Cu. Feet** State: Gas Type:	**580** Storage Container: Cylinder Days on Site: 365	**145**	580 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Acute Toxicity - Health Serious Eye Damage Eye Irritation - Health Simple Asphyxiant				
DOT: 2.2 - Nonflammable Gases	**NITROGEN/CARBON MONOXIDE CALIBRATION GAS** CAS No Map: 1 Grid: 2H	**Cu. Feet** State: Gas Type: Mixture	**280** Storage Container: Cylinder Days on Site: 365	**145**	280 Pressue: < Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Simple Asphyxiant	NITROGEN OXYGEN CARBON MONOXIDE	83% 12% 5%		7727-37-9 7782-44-7 124-38-9

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **UNIT 2 NITROGEN STORAGE**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**NITROGEN, COMPRESSED** CAS No 7727-37-9 Map: 1 Grid: 2E	**Cu. Feet** State Gas Type Pure	**1380** Storage Container Cylinder Days on Site: 365	**230**	1380 Pressue < Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Health Serious Eye Damage Eye Irritation				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **VARIOUS**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**CARBON DIOXIDE** CAS No 124-38-9 Map: F4 Grid: F2; F3	**Cu. Feet** State Gas Type Pure	**1320** Storage Container Cylinder Days on Site: 365	**220**	1320 Pressue Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Health Acute Toxicity - Health Aspiration Hazard				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **WATER TREATMENT BUILDING**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**CHEMTREAT BL-152** CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**440** Storage Container: Plastic/Non-metalic Drum	**55**	275 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	AMMONIUM HYDROXIDE Ethanolamine	30% 10%		1336-21-6 141-43-5
	CHEMTREAT BL-8301 CAS No	**Gallons** State: Liquid Type: Mixture	**165** Storage Container: Plastic/Non-metalic Drum	**55**	110 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity				
	CHEMTREAT BL-8401 CAS No Map: 1 Grid: 2G	**Gallons** State: Liquid Type: Mixture	**165** Storage Container: Plastic/Non-metalic Drum Days on Site: 365	**55**	110 Pressue: Temperature:	Waste Code	- Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation				
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**CHEMTREAT CL2250** CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**30** Storage Container: Carboy Days on Site: 365	**5**	20 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	5-chloro-2-methyl-4-isothiazolin-3-one 2-methyl-4-isothiazolin-3-one	1% 0%		26172-55-4 2682-20-4
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**CHEMTREAT CL-2875** CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**90** Storage Container: Plastic/Non-metalic Drum, Other Days on Site: 365	**55**	60 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Corrosive To Metal - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **WATER TREATMENT BUILDING**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	CHEMTREAT P873L CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**400** Storage Container: Aboveground Tank, Other Days on Site: 365	**400**	400 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified	Poly(dimethyldiallylammonium chloride)	30%		26062-79-3
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**CHEMTREAT RL1245** CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**565** Storage Container: Tank Inside Building Days on Site: 365	**400**	565 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Corrosive To Metal - Health Skin Corrosion Irritation	SODIUM BISULFITE			7631-90-5
DOT: 9 - Misc. Hazardous Materials	**CHEMTREAT RL9007** CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**565** Storage Container: Tank Inside Building Days on Site: 365	**400**	510 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	Diethylenetriamine penta methylene phosphonic acid	30%		22042-96-2
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**CHEMTREAT-BL-1794** CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**165** Storage Container: Plastic/Non-metalic Drum Days on Site: 365	**55**	110 Pressue: Temperature: Ambient	Waste Code	- Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	SODIUM PHOSPHATE, TRIBASTIC SODIUM HYDROXIDE	5% 5%		7601-54-9 1310-73-2
DOT: 9 - Misc. Hazardous Materials	**CONNTECT 6000** CAS No Map: 1 Grid: 4J	**Gallons** State: Liquid Type: Mixture	**165** Storage Container: Plastic/Non-metalic Drum Days on Site: 365	**55**	110 Pressue: Temperature:	Waste Code	- Physical Hazard Not Otherwise Classified - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	Ethylene Glycol Monobutyl Ether Ethoxylated Alcohols, C9 - C11	20% 40%		111-76-2 68439-46-3

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **METCALF ENGERGY CENTER**
Facility Name **METCALF ENERGY CENTER**
1 BLANCHARD RD, SAN JOSE 95013

Chemical Location **WATER TREATMENT BUILDING**

CERS ID **10097278**
Facility ID **43-060-409545**
Status **Submitted** on 2/27/2026 2:31 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**SODIUM HYPOCHLORITE 12.5%** CAS No Map: 1 Grid: 4J	**Gallons** State Liquid Type Mixture	**300** Storage Container Tank Inside Building Days on Site: 365	**400**	150 Pressue Ambient Temperature Ambient	Waste Code	- Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	SODIUM HYDROXIDE 10-60% SODIUM HYPOCHLORITE >12.5%-15% SODIUM CHLORIDE WATER	1% 13%		1310-73-2 7681-52-9 7647-14-5 7732-18-5

Appendix 8

COOLING TOWER DEPOT

INSPECTION REPORT FOR: METCALF ENERGY

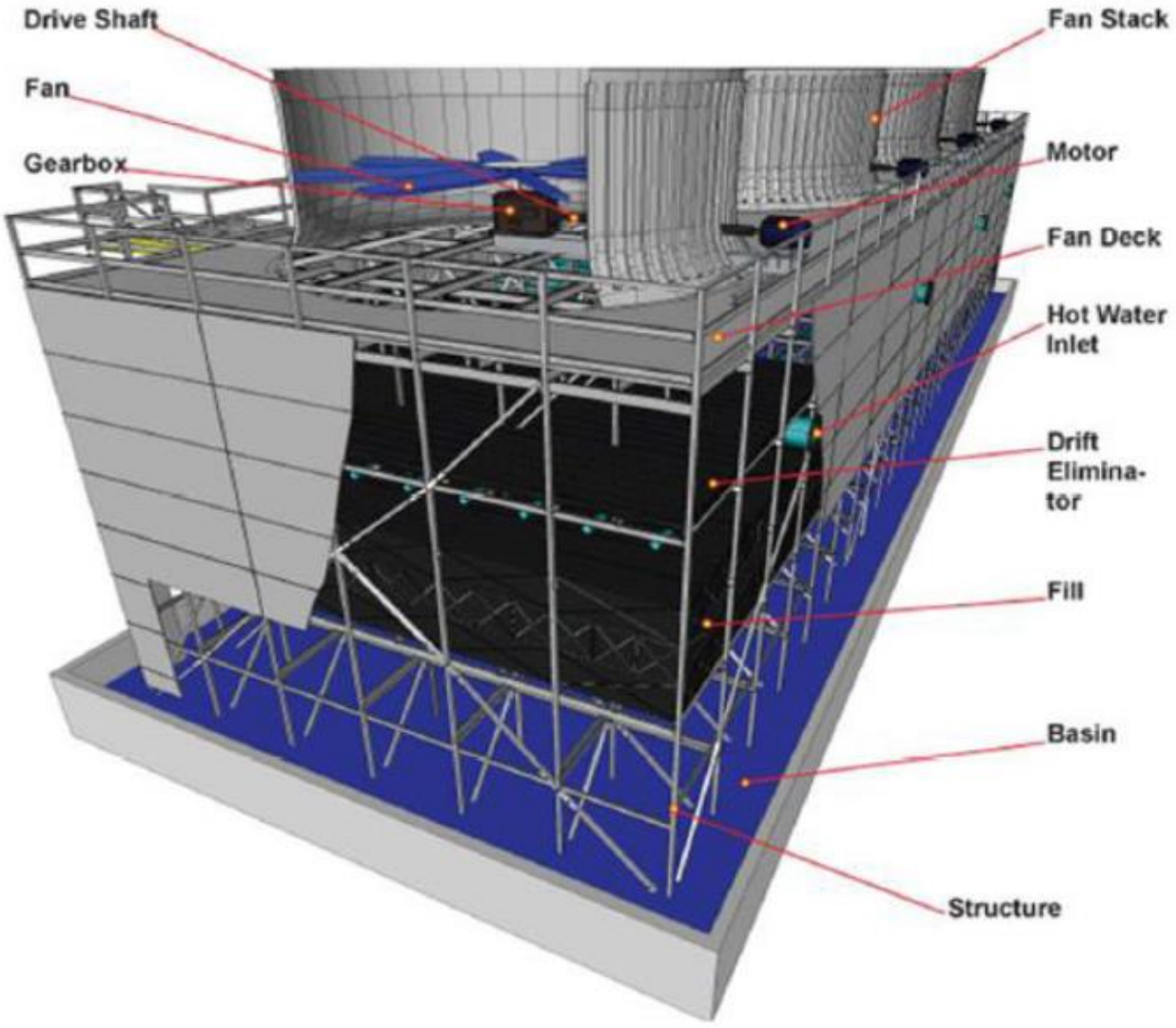
INSPECTOR:	C. Murray	**Cooling Tower Depot Job#:** - 25-2012
Date: 08/14/2025		

COMPANY NAME:	Metcalf Energy Center – Calpine Corporation
ADDRESS:	1 Blanchard Rd, Coyote CA 95013
ATTN:	Chris Schneider
	Plant Manager Metcalf Energy Center
Re:	CWS-CT-001 Cooling Tower Inspection

ORIGINAL MANUFACTURER:	Marley
TOWER TYPE:	Counter Flow/Plume Abatement
NUMBER OF CELLS:	10
CELL SIZE (L x W)	48 x 48
COLUMN SPACING	6 x 6
COOLING TOWER MODEL NO.:	F 488A-4.0
COOLING TOWER SERIAL NO.:	10PPWD 223647 04
CUSTOMER DESIGNATION:	CWS-CT-001
PROCESS SERVED BY TOWER:	Power



COUNTER-FLOW COOLING TOWER DIAGRAM:



The basis of this inspection was to identify any safety or structural/mechanical concerns and provide repair recommendations that would significantly improve the overall performance and extend the life expectancy of the tower.

An operational/on-line inspection of the tower exterior was completed, and all accessible areas in each cell were visually inspected with the individual Cells locked out

- Unless otherwise noted pictures represent typical condition of components in each Cell.

COMPONENT DESCRIPTION

The following describes the condition of the individual tower components:

01. EXTERIOR CASING & LOUVERS

CASING MATERIAL -	7.2-FRP	**HARDWARE -**	Stainless
CONDITION -	Good, minor leaks	**HEIGHT-**	45’
OBSTRUCTIONS	☒ **YES** ☐ **NO**	**DESCRIPTION** – Sump located at End Wall	

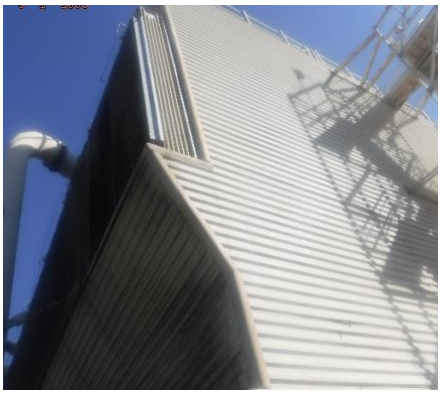
COMMENTS – The Exterior Casing has several leaking panels due to attachment hardware failure, allowing water to exit the tower. The Louver Actuators are inoperable and require replacement.







LOUVER ASSEMBLIES // LOUVER ACTUATOR





END WALLS

02. STRUCTURAL COMPONENTS

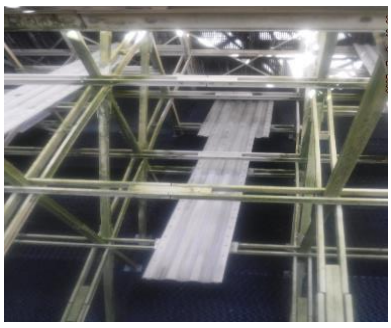
CONDITION – Good condition

MATERIAL –	Fiberglass / FRP	HARDWARE	Stainless
COLUMNS -		Size -	4 x 4
DIAGONALS –		Size -	4 x 4
TRANSVERSE TIES –		Size -	2 x 4
LONGITUDINAL TIES -		Size -	2 x 4

COMMENTS –
Detailed inspection of all accessible Structural Components, check for damaged or missing members, and any signs of chemical or biological deterioration. The Fiberglass structural components in the Plenum and Wet Areas are in good condition, with only moderate UV damage found in the Fan Area of each cell.







PLENUM AREA STRUCTURE




PERIMETER / WET AREA STRUCTURE

03. DRIFT ELIMINATORS

CONDITION -	Fair	**TYPE:**	CF 150
MATERIAL -	PVC	**SIZE – (two layers)**	6” x 12” x 6’
SUPPORT CONDITION:		Good	
MATERIAL -	FRP	**SIZE-**	2 x 4

COMMENTS – Drift Eliminators are designed to remove entrained water droplets from the leaving air stream, maximizing cooling capacity without the generation of undesirable water carryover/drift.
The Drift Eliminators are intact but brittle and accumulating solids, which could harm performance.





04. FILL

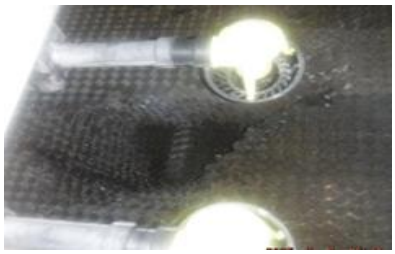
CONDITION -	Poor	**DEPTH-**	4’
MATERIAL -	PVC	**TYPE –**	Pack
FILL SUPPORT CONDITION		Good	

COMMENTS- Check Fill for build-up of scale, algae, or other contaminants on Fill Packs.
The Fill Media was found to be in poor condition, with damage noted in each Cell.

FILL TOP VIEW // FILL DAMAGE:


C-01


C-02


C-03


C-05


C-06


C-09



FILL SUPPORTS

05. DISTRIBUTION (counter flow)

CONDITION:	Fair condition due to the Header Pipe damage			
LATERALS:	**Material**	PVC	**Length**	20’
HEADERS:	**Material**	FRP	**Length**	48’
SUPPORTS:	**Material**	FRP	**Size**	2 x 4
NOZZLES:	**Condition**	Good	**Type**	Marley

COMMENTS-

The Distribution System and Supports were inspected to identify any leaks, nozzle failures, potential concerns, or performance issues; the internal Supply Piping and Nozzles were found to be in satisfactory condition. The Main Header Pipe located in Cell 03 and Cell 07 is leaking and requires repair at the next available opportunity.





MAIN HEADER //



LOWER HEADER PIPE



C-03



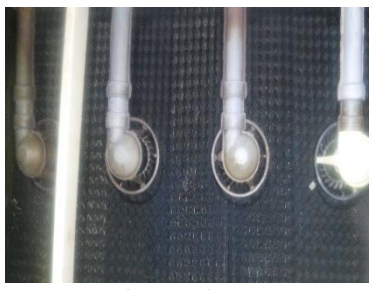
C-07



DISTRIBUTION SYSTEM



PIPE ADAPTER(Cell-06)



NOZZLES

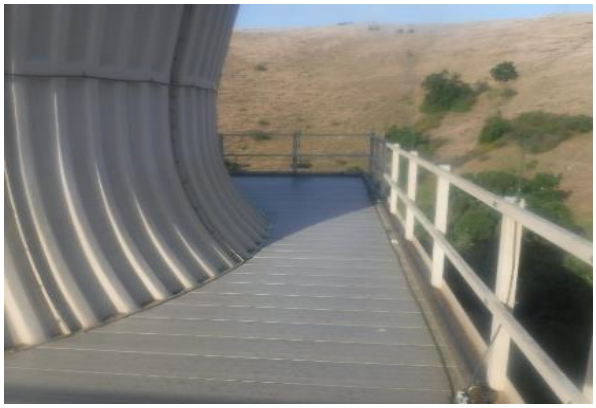
06. FAN DECK, ACCESS LADDERS, & HANDRAILS

MATERIAL –	FRP		**HARDWARE -**		Stainless
CONDITION -	Good		**SIZE -**		1-1/8” x 2’
JOIST CONDITION -	Good		**SIZE -**		2 x 6
FAN DECK JOIST ORIENTATION	☒ **TRANSVERSE**	☐ **LONGITUDINAL**			
JOIST SUPPORT CONDITION -	Good	**SIZE -**	2 x 6	**SPACING**	6’
TOWER HANDRAILS	**Good**	**ACCESS LADDERS**		Good	
EXISTING OVERLAY	☐ **YES** ☒ **NO**	**ANY OBSTRUCTIONS**		☐ **YES** ☒ **NO**	

COMMENTS – The Fiberglass Fan Deck is in good condition







FAN DECKING / HANDRAIL





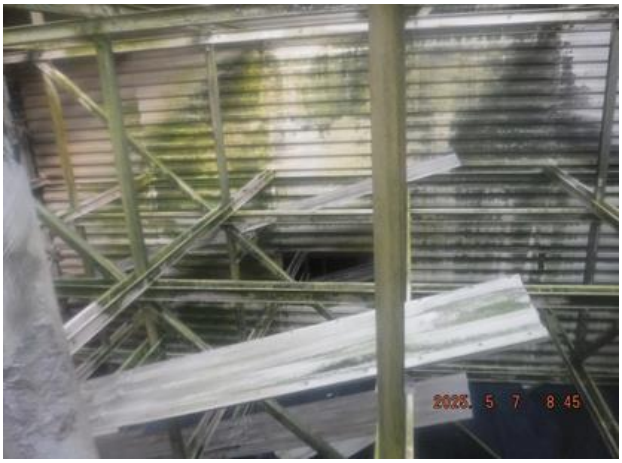

FAN DECK JOISTS // PLENUM ACCCESS LADDER

07. PARTITIONS

MATERIAL -	FRP	**HARDWARE -**	Stainless
CONDITION	Good	**HEIGHT -**	24’ Plenum Area

COMMENTS – The Cell 02/03 & Cell 08/09 Plenum Area Partition Walls have missing sections with loose panels; the remaining walls are intact and in good condition.






PLENUM AREA PARTITION




WET AREA PARTITION

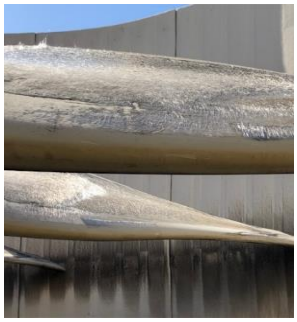
08. MECHANICAL EQUIPMENT

COMPONENT	CONDITION	CORROSION GRADING:				
		Good	Slight	Moderate	Apprec.	Severe
SUPPORT FRAME	GOOD	☐	☐	☒	☐	☐
MOTORS	GOOD	☐	☒	☒	☐	☐
GEARS	FAIR/POOR	☐	☐	☒	☐	☐
GEAR OIL LINES	POOR	☐	☐	☒	☒	☐
SHAFTS	GOOD	☐	☐	☒	☐	☐
SHAFT GUARDS	GOOD	☐	☒	☒	☐	☐
CONDUIT	GOOD	☒	☒	☐	☐	☐
FAN HUBS	POOR- CORRODED	☐	☐	☐	☒	☒
FAN BLADES	POOR	☐	☐	☐	☒	☒
BLADE CLAMPS/HDW	POOR	☐	☐	☐	☒	☒
FAN STACKS	GOOD	☒	☒	☐	☐	☐

COMMENTS – The Mechanical Equipment is in Poor Condition due to the deterioration level of the Fan Assemblies and the damaged/deteriorated Gear Seals.
The Fan Assemblies are approaching an unsatisfactory condition and require replacement, and the Gear reducers require repair. Continue to monitor through regular inspections and maintenance activities.

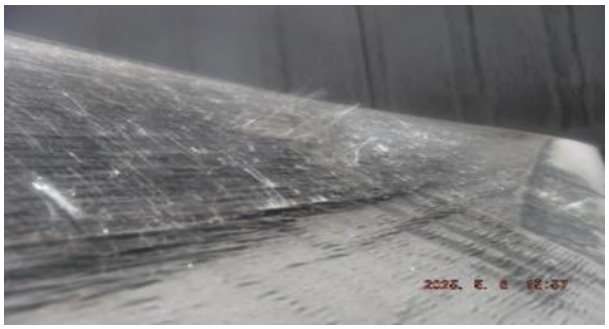
CELL 01 – GEAR BOX // CORRODED BLADE CLAMP // FAN BLADES






CELL 02 - FAN ASSEMBLY



08 MECHANICAL EQUIPMENT CONT.

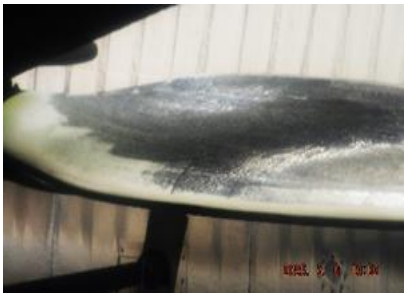
CELL 03 – GEAR // MECHANICAL SUPPORTS





CELL 04 – GEAR INPUT SHAFT // STEEL SUPPORT // FAN BLADE





CELL 05 – GEAR OUTPUT SHAFT // DRIVE LINE // FAN ASSEMBLY





CELL 06- GEAR // LEAKING OIL LINES // FAN ASSEMBLY







08 MECHANICAL EQUIPMENT CONT.

CELL 07 – GEAR // TORQUE TUBE – SUPPORT // BLADE CLAMP






CELL 08 – MECHANICAL ASSEMBLY // BLADE CLAMP // FAN BLADE



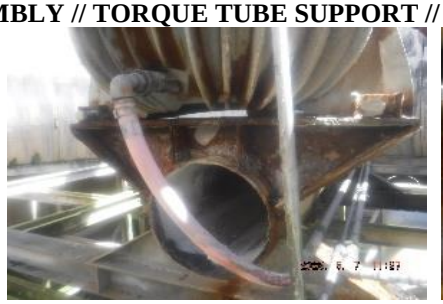


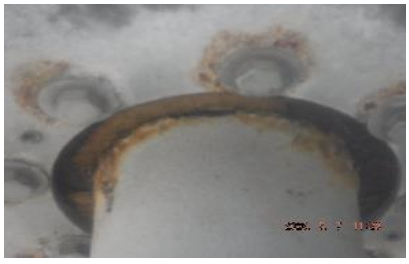
CELL 09 – MECHANICAL ASSEMBLY // STEEL SUPPORTS





CELL 10 –MECHANICAL ASSEMBLY // TORQUE TUBE SUPPORT // FAN BLADES



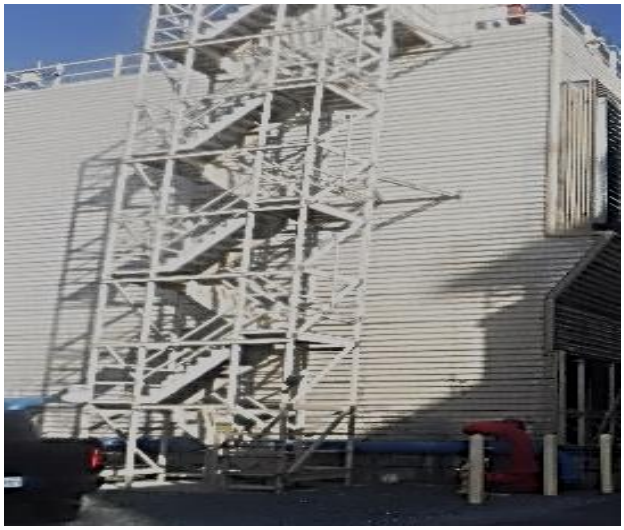


09. STAIRWAY & ESCAPE LADDER

STAIRWAY CONDITION -	Good	**MATERIAL -**	FRP
LADDER CONDITION	Good	**MATERIAL**	HDG

COMMENTS – The Fiberglass Stairway is in good condition with minimal deterioration. The galvanized Escape Ladder is intact and in good condition.









10. COLD WATER BASIN

MATERIAL -	Concrete	**MUD DEPTH–**	Unknown
CONDITION -	No damage noted	**BASIN HT. ABOVE GRADE -**	0

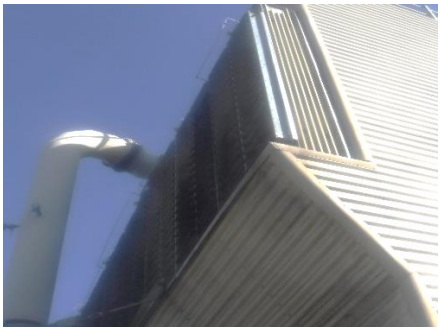
Comments – Basin full at time of inspection

11. PLUME ABATEMENT

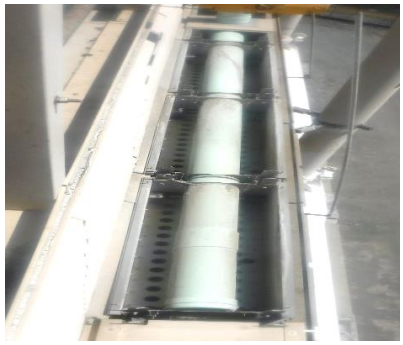
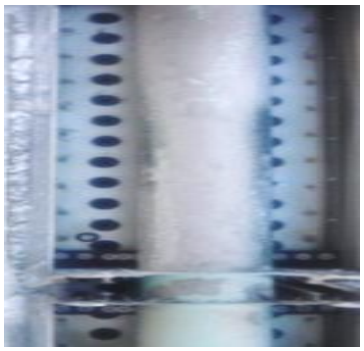
CONDITION	Unsatisfactory	TYPE	Marley Clear Sky

COMMENTS – The heat transfer media is plugged and in unsatisfactory condition, the exterior components are intact and in good condition.

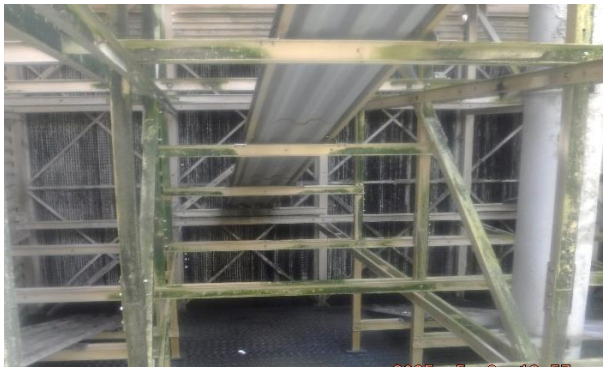
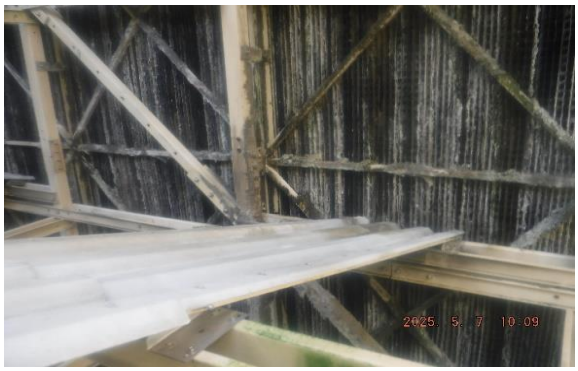
EXTERIOR COMPONENTS-



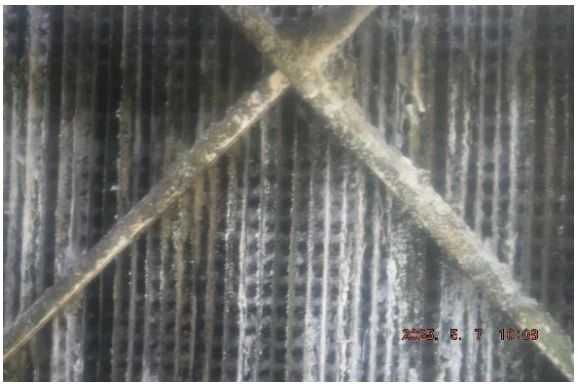


INTERIOR COMPONENTS / HEAT TRANSFET MEDIA -





SUMMARY- CWS – CT-001

The following summarizes the findings of the recent cooling tower inspection, along with regular maintenance activities Cooling Tower Depot recommends the following items be addressed:

Item Description	Priority Rating	Risk Rating	- Recommendations -
1. Casing & Louvers	**2**	**M**	The Exterior Casing is in Fair Condition due to the leaking seams and hardware at the stairway and ladder anchors. Recommend cleaning the leaking areas of the casing, corner seals, and re-secure with a stainless steel fastener and a self-sealing washer to ensure a watertight seal. The Louvers are intact and in good condition; the louver actuators are inoperable and require replacement.
2. Structure			The Fiberglass tower structure is in good condition with only minor deterioration noted. Recommend checking the Plenum Area Structure regularly for loose or missing hardware; specifically, the top two levels within a 20’ radius of the Fan Assembly.
3. Drift Eliminators	**2**	**M**	The existing Drift Eliminators are overall in fair condition; however, they are becoming brittle, and damaged sections were noted. Drift Eliminators that are plugged or damaged have reduced effectiveness in eliminating mist/drift. It is very difficult to ignore drift problems in cooling towers; drift promotes algae growth, causing more water use and plume, and is destructive to the mechanical equipment. Recommend replacement within two years or in conjunction with any major repairs.
4. Tower Fill	**1**	**H**	Due to the amount of damage and age of the Fill Media, we recommend replacement within the next year.
5. Distribution	**1**	**H**	Recommend repairing the leaking Header Pipe in Cells 03 & 07 at the next available opportunity. Continue regular inspections and maintenance of the distribution nozzles and components.

SUMMARY Cont.-

Item Description	Priority Rating	Risk Rating	- Recommendations -
6. Fan Deck	**3**	**M**	The Fan Deck and Supports are in good condition, and no repairs are anticipated at this time.
7. Partition Walls	**1**	**L**	The Partition walls at Cell 02/03 & Cell 08/09 are missing panels and require repair; recommend installing new panels in these Cells and securing loose hardware as required.
8. Mechanical Equip.	**1**	**H**	Cooling Tower Depot recommends replacing the Fan Assemblies within the next 2 years due to the UV deterioration level of the Fan Blades and the amount of corrosion found at the Blade Clamps and Hardware. *Note: Cell 03 has been replaced, but the blades have heavy scale build-up. Recommend replacing the leaking Gearbox Seals and Oil Lines in conjunction with regular maintenance activities.
Motor, Gear, Drive			
Fan Assembly			
Support Frame			
Fan Stack			
9. Stairway, Ladders and Handrail	**3**	**L**	The Stairways, Access Ladders, and the Perimeter Railing are in good condition; continue to monitor for loose hardware.
10. Cold Water Basin	**3**	**L**	The basin was full at the time of inspection; during the next extended plant shutdown, we recommend draining, thoroughly cleaning, and inspecting the entire concrete basin.
11. Plume Abatement	**1**	**H**	Recommend replacing the Heat Transfer Media at the next available opportunity due to the amount of solids accumulated in the media and the resulting additional weight on the tower structure.

DEFINITIONS:

PRIORITY RATING: Repairs rated **1 – 3**, with **1** requiring immediate repairs, **2** requiring repair, or replacement within 2-3 years and **3** likely requiring repair or replacement within 5 years.

RISK RATING: Items rated as High (**H**), Moderate (**M**), and Low (**L**) Based on impact to Operations - Loss of Use, Performance Loss, Environmental Impact, and Personal Safety.

Thank you for your continued interest with Cooling Tower Depot Inc. and if you require any additional information, please feel free to contact me at 707.608.9213.

Best Regards,

Casey Murray
Inspector/Sales Manager

Appendix 9

Metcalf Energy Center

Annual Compliance Report 2025

Water Usage Summary

Recycled Water	
month	consumption (gal)
January	40,081,580
February	34,679,524
March	42,151,296
April	30,242,388
May	10,549,044
June	17,215,220
July	47,901,172
August	67,637,152
September	44,798,468
October	60,145,184
November	13,648,756
December	36,610,860
Total	**445,660,644**

Potable Water	
month	consumption (gal)
January	6,798,415
February	6,201,750
March	7,841,119
April	7,126,069
May	5,192,362
June	6,290,029
July	7,226,114
August	9,870,099
September	7,420,070
October	8,238,958
November	4,015,623
December	11,247,639
Total	**87,468,248**

Metcalf Energy Center

Annual Compliance Report 2025

Water Usage Summary

Condition of Certification S&W-1

Recycled Water	
Cooling Tower for Steam Cycle Cooling	445,660,644
Total Gallons 2024	**445,660,644**

Potable Water	
Condenser Make-Up	31,709,050
Steam Attemperation	29,990,309
Inlet Air Cooling	8,134,684
Domestic	674,528
RO Reject	13,425,479
Filter Backwash	2,685,096
CT Wash Water	432,701
Plant Wash Down	618,145
Total Gallons 2025	**87,468,248**

Appendix 10

METCALF ENERGY CENTER, LLC

TRANS-3 HAZARDOUS MATERIAL DELIVERIES

JANUARY				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	1/8/2025	6,703	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	1/24/2025	6,700	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	1/28/2025	6,701	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	1/17/2025	6,700	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	1/31/2025	6,701	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	1/31/2025	3,268	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	1/20/2025	45,149	LBS

FEBRUARY				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	2/7/2025	6,700	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	2/13/2025	6,704	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	2/21/2025	6,732	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	2/26/2025	3,268	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	2/6/2025	44,944	LBS

MARCH				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	BL1794	3/6/2025	995	LBS
CHEMTREAT	CL4500	3/14/2025	7,598	LBS
CHEMTREAT	BL152	3/6/2025	3,347	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	3/10/2025	6,002	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	3/5/2025	6,700	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	3/20/2025	6,700	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	3/14/2025	6,411	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	3/28/2026	6,000	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	3/20/2025	3,145	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	3/3/2025	45,050	LBS
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	3/21/2025	43,988	LBS

APRIL				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	CL243	4/3/2025	4,652	LBS
CHEMTREAT	BL152	4/17/2025	3,347	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	4/17/2025	6,001	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	4/25/2025	6,700	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	4/10/2025	6,714	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	4/22/2025	3,500	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	4/21/2025	45,015	LBS

MAY				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	BL8401	5/29/2025	1,914	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	5/22/2026	6,402	GAL

JUNE				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	6/12/2025	6,101	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	6/29/2025	5,510	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	6/23/2025	3,268	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	6/12/2025	44,840	LBS

JULY				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	RL1245	7/11/2025	2,126	LBS
CHEMTREAT	RL1245	7/9/2025	2,350	LBS
CHEMTREAT	BL152	7/10/2025	3,420	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	7/15/2025	6,401	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	7/11/2025	6,401	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	7/24/2025	4,002	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	7/3/2025	6,401	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	7/17/2025	3,268	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	7/18/2025	45,655	LBS

AUGUST				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	RL9007	8/21/2025	1,616	LBS
CHEMTREAT	BL1794	8/21/2025	995	LBS
CHEMTREAT	RL1245	8/25/2025	2,350	LBS
CHEMTREAT	BL152	8/8/2025	1,674	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	8/5/2025	6,402	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	8/8/2025	4,001	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	8/19/2025	6,401	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	8/22/2025	5,001	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	8/27/2025	6,401	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	8/29/2025	6,405	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	8/13/2025	6,408	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	8/13/2025	3,268	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	8/29/2025	3,500	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	8/14/2025	44,974	LBS

SEPTEMBER				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	RL1245	9/19/2025	2,126	LBS
CHEMTREAT	BL152	9/3/2025	1,647	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	9/5/2025	6,405	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	9/10/2025	6,400	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	9/30/2025	6,400	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	9/26/2025	5,000	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	9/18/2025	5,003	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	9/19/2025	3,500	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	9/2/2025	43,956	LBS
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	9/11/2025	44,948	LBS

OCTOBER				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	BL1794	10/16/2025	995	LBS
CHEMTREAT	BL8401	10/3/2025	1,435	LBS
CHEMTREAT	BL152	10/3/2025	3,347	LBS
CHEMTREAT	BL152	10/6/2025	3,347	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	10/6/2025	6,400	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	10/30/2025	6,401	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	10/10/2025	5,401	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	10/16/2025	6,036	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	10/22/2025	6,401	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	10/10/2025	3,223	GAL
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	10/1/2025	44,989	LBS
UNIVAR SOLUTIONS	SODIUM HYPOCHLORITE	10/22/2025	43,978	LBS

NOVEMBER				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	11/21/2025	5,917	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	11/19/2025	3,500	GAL

DECEMBER				
VENDOR NAME	CHEMICAL	RECEIVED	QUANTITY	UOM
CHEMTREAT	CL243	12/15/2025	2,326	LBS
CHEMTREAT	RL9007	12/12/2025	1,079	LBS
CHEMTREAT	RL1245	12/15/2025	1,594	LBS
CHEMTREAT	CL243	12/15/2025	2,326	LBS
CHEMTREAT	BL152	12/1/2025	1,674	LBS
CHEMTREAT	BL1794	12/1/2025	497	LBS
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	12/1/2025	6,451	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	12/17/2025	6,401	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	12/12/2025	6,400	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	12/5/2025	6,400	GAL
HILL BROTHERS CHEMICAL	AQUEOUS AMMONIA	12/23/2025	5,003	GAL
NORTHSTAR CHEMICAL	SULFURIC ACID	12/15/2025	3,500	GAL

Appendix 11

California Energy Commission's Condition of Certification

VISUAL RESOURCES-1 WO# 34590673

2025

METCALF ENERGY CENTER, LLC
STATUS REPORT REGARDING THE ARCHITECTURAL DESIGN TREATMENT MAINTENANCE

California Energy Commission Condition of Certification Visual Resources – 1 requires the Metcalf Energy Center to submit in its Annual Compliance Report a status report regarding the treatment maintenance of the project structures. The project structures, which are visible to the public, have been painted with CPM-approved and City of San Jose-approved non-reflective colors with a low-gloss finish.

The Metcalf Energy Center Maintenance Department has procedures to address all aspects for maintaining the power plant efficiently. Issues such as coating or painting are captured by staff's surveillance and utilization of checklists. Once an item is deemed in need of maintenance, Plant Management schedule and prioritizes the maintenance through a work order process. Outside contractors are also utilized at Metcalf Energy Center. Plant Management inspects and signs off on the work once it is fully complete.

A copy of the checklists used to survey the architectural screen as well as the other painted surfaces visible from offsite is attached to this summary.

ARCHITECTURAL TREATMENT INSPECTION DEFINITIONS

Chalking - To powder from weathering.

Erosion - State of being eroded.

Discoloration - A discolored marking or area; stain.

Fading - To lose brightness or vividness of color.

Loss of Gloss - A paint defect in which a dried film of paint loses gloss, usually over a period of time.

Mildew Defacement - Any of similar coatings or discolorations, caused by fungi, as that which appears when exposed to moisture.

Moisture Blushing - Blushing takes place when moisture goes through condensation on a coated surface during the process of curing. At times, the moisture may be generated from porous substrates. Blushing manifests as milky or white patches, with hazy effects in clear types of coatings. In pigmented coatings, blushing may produce defects in its gloss. Blushing is also known as water spotting.

Orange Peel - Orange peel occurs when paint is applied over an area with oil on the surface. Something as small as a fingerprint can leave enough oil on the surface to show up as orange peel in a completed paint job.

Wrinkling - A temporary slight ridge or furrow on a surface, due to contraction, folding, crushing, or the like.

Chemical Attack – Decomposition of a coating due to chemical exposure.

High Temperature Attack - Decomposition of a coating due to exposure to high temperatures.

Mottling - To color with streaks or blotches of different shades.

Crackling - To form a network of fine cracks on the surface.

Saponification - A reaction in which an ester is heated with an alkali, such as sodium hydroxide, producing a free alcohol and an acid salt.

Disbanding (peel/blister) - To break up or dissolve the coating.

Crawling (fish eye) - To raise or contract because of an imperfect bond with the underlying surface. A surface defect having the form of a spot.

ARCHITECTURAL DESIGN TREATMENT INSPECTION METCALF ENERGY CENTER

UNIT: Steam Turbine

	TURBINE / GENERATOR ENCLOSURE	GENERATOR / CONDENSER SOUND WALL
Chalking	2	2
Erosion	1	1
Discoloration	3	2
Fading	3	3
Loss of Gloss	3	3
Mildew Defacement	3	1
Moisture Blushing	1	1
Orange Peel	1	1
Wrinkling	1	1
Chemical Attack	1	1
High Temperature Attack	2	1
Mottling	1	1
Crackling	1	1
Saponification	1	1
Disbanding (peel/blister)	1	1
Crawling (fish eye)	1	1

Comments:

Rating System: Mark a number from 1 through 5 in the appropriate box to indicate the condition of the coating:
1 = No Problems; 2 = Minor Problems; 3 =Average Problems; 4 = Increased Problems; 5 = Major Problems.

ARCHITECTURAL DESIGN TREATMENT INSPECTION METCALF ENERGY CENTER

UNIT: Cooling Tower

	SUPERSTRUCTURE
Chalking	3
Erosion/Corrosion	2
Discoloration	3
Fading	3
Loss of Gloss	3
Mildew Defacement	1
Moisture Blushing	3
Orange Peel	1
Wrinkling	1
Chemical Attack	1
High Temperature Attack	1
Mottling	1
Crackling	1
Saponification	1
Disbanding {peel/blister)	1
Crawling (fish eye)	1

Comments:

Rating System: Mark a number from 1 through 5 in the appropriate box to indicate the condition of the coating:
1 = No Problems; 2 = Minor Problems; 3 =Average Problems; 4 = Increased Problems; 5 = Major Problems.

ARCHITECTURAL DESIGN TREATMENT INSPECTION METCALF ENERGY CENTER

UNIT: HRSG & Gas Turbine 1

	INLET AIR FILTER HOUSE	TURBINE/ GENERATOR	STACK	SCREENING
Chalking	3	2	3	3
Erosion/Corrosion	1	2	1	1
Discoloration	2	2	2	2
FadinQ	3	3	3	3
Loss of Gloss	3	3	3	3
Mildew Defacement	1	1	1	1
Moisture Blushing	1	1	1	1
Orange Peel	1	1	1	1
Wrinkling	1	1	1	1
Chemical Attack	1	1	1	1
High Temperature Attack	1	1	1	1
Mottling	1	1	1	1
Crackling	1	1	1	1
Saponification	1	1	1	1
Disbanding (peel/blister)	1	1	1	1
Crawling (fish eye)	1	1	1	1

Comments: CT 1 South wall

Rating System: Mark a number from 1 through 5 in the appropriate box to indicate the condition of the coating:
1 = No Problems; 2 = Minor Problems; 3 =Average Problems; 4 = Increased Problems; 5 = Major Problems.

ARCHITECTURAL DESIGN TREATMENT INSPECTION METCALF ENERGY CENTER

UNIT: HRSG & Gas Turbine 2

	INLET AIR FILTER HOUSE	TURBINE/ GENERATOR	STACK	SCREENING
Chalking	1	1	1	1
Erosion/Corrosion	1	1	1	1
Discoloration	1	2	1	2
Fading	1	2	2	1
Loss of Gloss	1	1	1	1
Mildew Defacement	1	1	1	1
Moisture Blushing	1	1	1	1
Orange Peel	1	1	1	1
Wrinkling	1	1	1	1
Chemical Attack	1	1	1	1
High Temperature Attack	1	1	1	1
Mottling	1	1	1	1
Crackling	1	1	1	1
Saponification	1	1	1	1
Disbanding (peel/blister)	1	1	1	1
Crawling (fish eye)	1	1	1	1

Comments:

Rating System: Mark a number from 1 through 5 in the appropriate box to indicate the condition of the coating:
1 = No Problems; 2 = Minor Problems; 3 =Average Problems; 4 = Increased Problems; 5 = Major Problems.

ARCHITECTURAL DESIGN TREATMENT INSPECTION METCALF ENERGY CENTER

UNIT: Water Tanks

	SERVICE/FIRE WATER	DEMINERALIZED WATER
Chalking	3	3
Erosion/Corrosion	1	1
Discoloration	2	2
Fading	3	3
Loss of Gloss	3	3
Mildew Defacement	1	1
Moisture Blushing	1	1
Orange Peel	1	1
Wrinkling	1	1
Chemical Attack	1	1
High Temperature Attack	1	1
Mottling	1	1
Crackling	2	2
Saponification	1	1
Disbanding (peel/blister)	1	1
Crawling (fish eye)	1	1

Comments: Some stains from previous leaks.

Rating System: Mark a number from 1 through 5 in the appropriate box to indicate the condition of the coating:
1 = No Problems; 2 = Minor Problems; 3 =Average Problems; 4 = Increased Problems; 5 = Major Problems.

ARCHITECTURAL DESIGN TREATMENT INSPECTION METCALF ENERGY CENTER

UNIT: Buildings

	ADMINISTRATION	WAREHOUSE
Chalking	3	3
Erosion/Corrosion	2	2
Discoloration	3	3
Fading	3	3
Loss of Gloss	3	3
Mildew Defacement	1	1
Moisture Blushing	1	1
Orange Peel	1	1
Wrinkling	1	1
Chemical Attack	1	1
High Temperature Attack	1	1
Mottling	1	1
Crackling	1	1
Saponification	1	1
Disbanding (peel/blister)	1	1
Crawling (fish eye)	1	1

Comments:

Rating System: Mark a number from 1 through 5 in the appropriate box to indicate the condition of the coating:
1 = No Problems; 2 = Minor Problems; 3 =Average Problems; 4 = Increased Problems; 5 = Major Problems.

Appendix 12

Metcalf Energy Center Plume Log - Year to Date

Cooling Tower Plumes

Date	Start Time	End time	Total Time	Event	Relative Humidity	Temperature	Supplemental Firing (On/Off)	Plume Abatement In Service (Louvers Open)
January 17, 2025	8:56	9:30	0:34	**Plume**	75	44	Off	Yes
January 21, 2025	7:17	8:05	0:48	**Plume**	69	38	Off	Yes
January 22, 2025	7:15	7:30	0:15	**Plume**	85	32	Off	Yes
January 23, 2025	7:15	7:40	0:25	**Plume**	76	33	Off	Yes
January 24, 2025	7:16	8:00	0:44	**Plume**	81	37	Off	Yes
January 26, 2025	7:14	7:39	0:25	**Plume**	87	37	Off	Yes
January 27, 2025	8:00	8:30	0:30	**Plume**	87	31	Off	Yes
January 28, 2025	7:13	8:00	0:47	**Plume**	87	31	Off	Yes
January 29, 2025	7:21	7:36	0:15	**Plume**	76	45	Off	Yes
January 30, 2025	7:11	7:38	0:27	**Plume**	84	44	Off	Yes
January 31, 2025	7:10	8:00	0:50	**Plume**	84	44	Off	Yes
No Plume Events in February2025								
No Plume Events in March 2025								
April 16, 2025	8:38	8:53	0:15	**Plume**	76	56	Off	Yes
April 22, 2025	9:35	10:05	0:30	**Plume**	89	52	Off	Yes
No Plume Events in May 2025								
No Plume Events in June 2025								
No Plume Events in July 2025								
August 29, 2025	6:56	7:30	0:34	**Plume**	89	56	Off	Yes
September 26, 2025	6:57	7:30	0:33	**Plume**	85	60	Off	Yes
September 27, 2025	6:57	7:30	0:33	**Plume**	89	59	Off	Yes
September 29, 2025	6:53	7:15	0:22	**Plume**	79	65	Off	Yes
September 30, 2025	6:57	7:30	0:30	**Plume**	89	61	Off	Yes
October 6, 2025	7:07	7:52	0:45	**Plume**	88	51	Off	Yes
October 9, 2025	8:22	8:37	0:15	**Plume**	89	54	Off	Yes
October 13, 2025	7:14	7:30	0:16	**Plume**	88	51	Off	Yes
October 22, 2025	7:22	8:00	0:38	**Plume**	88	54	Off	Yes
No Plume Events in November 2025								
December 2, 2025	8:50	9:30	0:40	**Plume**	89	48	Off	Yes
December 3, 2025	7:04	7:24	0:20	**Plume**	64	51	Off	Yes
December 4, 2025	8:03	8:33	0:30	**Plume**	89	38	Off	Yes
December 30, 2025	7:20	8:05	0:45	**Plume**	87	36	Off	Yes

Total Cooling Tower Plume Hours: **13:26**

Remedial Actions To Be Taken

1. The Operator will verify that the plume abatement was in service.
2. The Operator will verify that the louvers were completely opened.
3. Curtail supplementary firing in the HRSG.

Stack Plumes

Date	Start Time	End time	Total Time	Event	Relative Humidity	Temperature	Supplemental Firing (On/Off)	Steam Injection (On/Off)	Economizer By-Pass Valve Position
No Plume Events in January 2025									
No Plume Events in February2025									
No Plume Events in March 2025									
No Plume Events in May 2025									
No Plume Events in June 2025									
No Plume Events in July 2025									
No Plume Events in August 2025									
No Plume Events in September 2025									
No Plume Events in October 2025									
No Plume Events in November 2025									
No Plume Events in December 2025									

Total Stack Plume Hours: **0:00**

Remedial Actions Taken

1. The Operator will operate the economizer bypass valve.
2. Curtail steam injection to the combustion turbine (called PAG steam).
3. Curtail supplementary firing in the HRSG.

Total Combined Plume Hours: **13:26**

Metcalf Energy Center Monthly Plume Log

Cooling Tower Plumes

Date	Start Time	End time	Total Time	Event	Relative Humidity	Temperature	Supplemental Firing (On/Off)	Plume Abatement In Service (Louvers Open)
No Plume Events in December 2025								

Total Cooling Tower Plume Hours: **0:00**

Remedial Actions To Be Taken

1. The Operator will verify that the plume abatement was in service.
2. The Operator will verify that the louvers were completely opened.
3. Curtail supplementary firing in the HRSG.

Stack Plumes

Date	Start Time	End time	0	Event	Relative Humidity	Temperature	Supplemental Firing (On/Off)	Steam Injection (On/Off)	Economizer By-Pass Valve Position
No Plume Events in December 2025									

Total Stack Plume Hours: **0:00**

Remedial Actions Taken

1. The Operator will operate the economizer bypass valve.
2. Curtail steam injection to the combustion turbine (called PAG steam).
3. Curtail supplementary firing in the HRSG.

Total Combined Plume Hours: **0:00**

Appendix 13

METCALF ENERGY CENTER

2025 ANNUAL COMPLIANCE REPORT

WASTE-3

In accordance with **Waste-3**, the Metcalf Energy Facility is required to document actual waste management methods used during the year compared to planned management methods. The facility is currently using the planned waste management methods for all the waste streams generated within the facility, as listed in the table below.

Waste Stream	Type	Planned	Actual
Non-hazardous Solid Waste	Recyclables	Recycle (Off-site)	Recycle (Off-site)
	Non-Recyclables	Landfill	Landfill
Non-hazardous Liquid Waste	Sanitary Waste	Sewage Treatment Plant	Sewage Treatment Plant
	Process Wastewater	Sewage Treatment Plant	Sewage Treatment Plant
Hazardous Liquid Waste	Used Oil	Recycle (Off-site)	Recycle (Off-site)
	Oily Water	Off-site disposal company	Off-site disposal company
	Aqueous Parts Washer	Off-site disposal company	Off-site disposal company
	Flammable Liquid	Off-site disposal company	Off-site disposal company
Hazardous Solid Waste	Used Oil Filters	Recycle (Off-site)	Recycle (Off-site)
	Oily Solids	Off-site disposal company	Off-site disposal company
	Debris from HRSG Cleaning	Off-site disposal company	Off-site disposal company
	Universal Waste	Recycle (Off-site)	Recycle (Off-site)

Appendix 14

Metcalf Energy Center, LLC

1 Blanchard Road
Coyote, CA 95013

July 2, 2025

VIA EMAIL DELIVERY

Director, Enforcement and Compliance Division
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Jeffrey Gove jgove@baaqmd.gov

Director, Air Division (Attn: AIR-5)
U.S. Environmental Protection Agency
75 Hawthorne St.
San Francisco, CA 94105
Attn: R9.aeo@epa.gov

RE: Metcalf Energy Center, LLC., Permit No. 18136
Title V– 10- and 30-Day Deviation Follow-Up Report

Dear Mr. Gove,

In accordance with the Major Facility Review Permit (Title V Permit) for the Metcalf Energy Center (the "Facility"), this letter is to advise you of an instance of potential non-compliance as required by Section I. F. Monitoring Reports, of the Title V Permit, which requires the reporting of all non-compliance instances of the Title V Permit in writing within 10 days. This letter also satisfies the 30-day follow-up reporting requirement as required by Section I.F. of the Title V Permit.

As of June 30, 2025 the Facility was unable conduct the testing for toxics at maximum load with power augmentation (PAG) required biennially per Title V Condition 33 or the Relative Accuracy Test Audit (RATA) required every four (4) calendar quarters by 40 CFR Part 60.

Event Description

On May 26, 2025, during routine maintenance on the CT-1 the Facility noted a crack on the exhaust bearing strut and began an investigation to determine the severity of the crack. On May 30, 2025, it was determined that there were multiple cracks on the struts and that the unit would need to go into an extended outage for repairs.

The Facility notified BAAQMD via email on June 2, 2025 (attached) that the testing previously scheduled for the week of June 9, 2025, would need to be postponed and could not be completed until CT-1 was returned to service.

Corrective Actions

Repairs to the CT-1 exhaust bearing strut are now complete. Source testing and RATA has been rescheduled for the week of August 4, 2025.

Compliance Status

The facility is currently out of compliance with permit conditions as described above. The Facility expects to return to compliance on or about August 8, 2025.

The Facility is in compliance with all remaining Title V Conditions.

Certification

As a Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

If you have any questions or require additional information, please contact Rosemary Silva at (408) 361-4954 or via email at silvaro@calpine.com.

Sincerely,

Signed by:
Chr Schneider
BFFA23815E88434...
Christopher Schneider
Plant Manager
Metcalf Energy Center, LLC

Cc: Anwar Ali, CEC via email attachment
EHSWalnutCreek@calpine.com via email attachment
CICS INC104028

Attachment: June 2, 2025, email communication to BAAQMD

Appendix A

From: Rosemary Silva
To: Marie Miller; Marco Hernandez; Sourcetest
Cc: Anwar Ali (Anwar.Ali@energy.ca.gov); EPA; Erin Phillips; Kevin Crosby; Christopher Wymore
Subject: UPDATE: 2025 CEMS RATA and Source Test Plan and 30-Day Test Notification at Metcalf Energy Center Plant No. 12183
Date: Friday, May 30, 2025 9:01:00 AM
Attachments: image001.png
image002.png

Morning Everyone,
I just wanted to send an email to update everyone on the status of the upcoming testing at Metcalf Energy Center. We have recently confirmed that we have an unforeseen mechanical issue on CT-1, that requires the unit be down for repairs. Due to these repairs, the unit will not be available for RATA/Source Testing the week of June 9th as we originally scheduled.

We will proceed with testing on CT-2, to the extent possible, as originally scheduled.

We are currently working with our testing contractor, Montrose, to reschedule CT-1 and any other testing that cannot be completed while the unit is being repaired, as soon as their availability permits.

We will continue to keep everyone updated as the situation develops. If you have any questions or concerns, please let me know.

Thank you for your time!

Rosemary Silva
EHS Project Manager
OLS Energy-Agnews, Metcalf Energy Center,
and Los Esteros Critical Energy Facility
Phone: 408-361-4954 | **Mobile:** 408-386-3151
Email: silvaro@calpine.com
1 Blanchard Road, Coyote, CA 95013
CALPINE

From: Marie Miller <mmiller@baaqmd.gov>
Sent: Thursday, May 1, 2025 4:49 PM
To: Rosemary Silva <rosemary.silva@calpine.com>; Marco Hernandez <MHernandez@baaqmd.gov>; Sourcetest <Sourcetest@baaqmd.gov>
Cc: Anwar Ali (Anwar.Ali@energy.ca.gov) <Anwar.Ali@energy.ca.gov>; EPA <r9.aeo@epa.gov>; Erin Phillips <ephillips@baaqmd.gov>
Subject: RE: 2025 CEMS RATA and Source Test Plan and 30-Day Test Notification at Metcalf Energy Center Plant No. 12183

⚠ EXTERNAL SENDER ⚠
Do not click links, open attachments or enter your ID/Password unless you recognize the sender and are certain the content is safe. **If anything appears suspicious, report it.**
Consider the following before taking action: *Were you expecting this email? Can you verify the sender? Are the grammar and spelling correct? Does the content or request make sense?*

NST-10422 to 10425 have been assigned. Please see table below for details. NST-10422 to 10423 are for the source tests and NST-10424 to 10425 are for the RATAs.

NST#	Site_ID	Facility_Name	TitleV_Status	Facility_Type	Source#	Source_Descri...	Source_Categ...	Pollutants_Me...	Notice_Rec_Date
10422	B2183	Metcalf Energy Center	Title V	Power Plant	S-1/2	Turbine 1/HRSG		CO, NOx, POC, PM, PAHs, Formaldehyde, Benzene	5/1/2025
10423	B2183	Metcalf Energy Center	Title V	Power Plant	S-3/4	Turbine 2/HRSG		CO, NOx, POC, PM, PAHs, Formaldehyde, Benzene	5/1/2025
10424	B2183	Metcalf Energy Center	Title V	Power Plant	S-1/2	Turbine 1/HRSG		CO, NOx	5/1/2025
10425	B2183	Metcalf Energy Center	Title V	Power Plant	S-3/4	Turbine 2/HRSG		CO, NOx	5/1/2025

Also, we've introduced a new, supplemental form to be included when reports are submitted. It's just a sheet intended to help us with processing reports and prioritizing report review. The intention of the email is not to request additional testing. Please complete and submit the attached **"Contractor ST Supplemental Form"** with the final test report.

NST number(s) that are assigned for each source test notifications are for inner-office tracking purposes only, not an approval of the test plan. (For source testing methodologies please review permit conditions, BAAQMD Regulations and CFR, accordingly). Future notifications and report submittals should be made to **Sourcetest@baaqmd.gov**,and **cc: MHernandez@baaqmd.gov**

If you have other questions, please contact Marco Hernandez at mhernandez@baaqmd.gov.

Thank you,

Marie

From: Rosemary Silva <rosemary.silva@calpine.com>
Sent: Thursday, May 1, 2025 4:12 PM
To: Marco Hernandez <MHernandez@baaqmd.gov>; Sourcetest <Sourcetest@baaqmd.gov>; Marie Miller <mmiller@baaqmd.gov>
Cc: Anwar Ali (Anwar.Ali@energy.ca.gov) <Anwar.Ali@energy.ca.gov>; EPA <r9.aeo@epa.gov>; Erin Phillips <ephillips@baaqmd.gov>
Subject: 2025 CEMS RATA and Source Test Plan and 30-Day Test Notification at Metcalf Energy Center Plant No. 12183

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: 2025 CEMS RATA and Source Test Plan and 30-Day Test Notification at Metcalf Energy Center Plant No. 12183

All,
In compliance with 40 CFR Part 60 and 40 CFR Part 75 and permit to operate #B2183, attached you will find an electronic copy of the test plan for the annual CEMS RATA and Source Test to be performed at the Metcalf Energy Center Plant, Inc, located in San Jose, California for your review.

The testing will begin on June 9, 2024, and finish on June 13, 2024, barring any unforeseen issues or delays.

Unless otherwise notified by BAAQMD or CEC, the facility assumes that the attached test protocol is approved.

If you have any questions or comments, please do not hesitate to contact me.

Thanks!

Rosemary Silva
EHS Project Manager
OLS Energy-Agnews, Los Esteros Critical Energy Facility,
Metcalf Energy Center, Calpine Gilroy Cogen and Gilroy Energy Center
Phone: 408-361-4954 | **Mobile:** 408-386-3151
Email: silvaro@calpine.com
1 Blanchard Road, Coyote, CA 95013
CALPINE

Metcalf Energy Center, LLC

1 Blanchard Road
Coyote, CA 95013

August 12, 2025

VIA EMAIL DELIVERY

Director, Enforcement and Compliance Division
Bay Area Air District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Jeffrey Gove jgove@baaqmd.gov

Director, Air Division
U.S. Environmental Protection Agency
75 Hawthorne St.
San Francisco, CA 94105
Attn: R9.aeo@epa.gov

RE: Metcalf Energy Center, LLC., Permit No. B2183
Major Facility Review Permit (Title V Permit)
Title V 30-Day Deviation Follow-Up Report
RCA ID: 201789

In accordance with the Major Facility Review Permit (Title V Permit) for the Metcalf Energy Center (the "Facility"), this letter presents the 30-day follow-up report of a permit deviation as required by Section I.F. of the Title V Permit.

The Reportable Compliance Activity (RCA) notification was submitted to the District on July 16, 2025 and a 10-day deviation notification was submitted on July 22, 2025.

On July 13, 2025, the facility experienced a calculated excess of the ammonia (NH_3) concentration emission limit of 5 ppm corrected to 15% O_2, averaged over any rolling 3-hour period, as stated in Condition 20 (e) of the Title V permit on Combustion Turbine #1 (CT-1).

Event Description

While operating under normal conditions on July 13, 2025 at 06:15 DAHS time, the Control Room Operator (CRO) received an alarm on the distributed control system (DCS) that stated, "*Aqueous Ammonia Flow – Leak Detection*" and took action to identify the cause of the alarm. The CRO noted that the DAHS did not indicate any excess emissions. While troubleshooting the situation, the CRO observed that the ammonia flow and stack NO_X were outside of their normal ranges and decided to emergency stop CT-1 at 06:35 DAHS time. The CRO reviewed the DAHS reports and there was no indication of any excess emissions from the event.

As described below, the SCR NO_X analyzer failed, causing the DAHS to invalidate CEMS data. The Facility performed routine data substitution for the SCR NO_X data, using a value of 22.4 ppm, which is within normal operating range. For hour 06:00, the calculated data indicates emissions of 12.8 ppm corrected to 15% O_2 on a rolling 3-hour basis. The permitted limit is 5-ppm corrected to 15% O_2, averaged over any rolling 3-hour period.

Ammonia emission formula and calculations are presented as Attachment A.

Corrective Actions

The combustion turbine was shut down using the emergency shut down process (an "e-stop") at 06:35 (DAHS time).

Compliance Status

The Facility returned to compliance with ammonia slip emissions at 08:00 Pacific Daylight Time and is currently in full compliance with the conditions of Title V air permit.

Investigation and Cause Determination

The Facility determined that the SCR NO_X analyzer sample cooler failed, causing the analyzer to transmit a false raw NO_X value to the DCS.

The DCS is programmed to automatically control ammonia flow based on either the raw NO_X emissions coming from the combustion turbine (as measured by the SCR NO_X analyzer) or the controlled NO_X emissions at the stack (as measured by the CEMS NO_X analyzer) depending on which indication has the highest ammonia demand. Automatic ammonia flow control allows the Facility to effectively and efficiently control stack NO_X emissions based on fluctuating operational conditions.

As shown in Attachment B, at 05:57 (DAHS time), raw NO_X emissions ("SCR NO_X ppm 1-Min") are measured at 23 ppm, which is an expected value while in normal operations. When the SCR NO_X analyzer sample cooler failed, it caused a false indication of increasing raw NO_X (ultimately increasing to 197.9 ppm). In response, the DCS increased ammonia flow ("NH_3 flow 1-MIN lb/hr") to a rate over 500 lbs./hr, even after driving stack NO_X emissions to 0 ("NO_X ppm @ 15% O_2 1-Min").

Preventative Actions

The Facility is currently in the process of updating the PLC for the DAHS, which will give the Facility more opportunity to add additional alarms of analyzer status. The Facility will be adding an alarm to the DAHS that stack NO_X is low alerting the CRO that there could be a potential issue with over-feeding ammonia.

The Facility performs, and will continue to perform, routine maintenance on the SCR NO_X analyzer sample cooler according to the manufacturer's recommendations.

Certification

As the Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

If you have any questions or require additional information, please contact me at 408-361-4920 or Rosemary Silva, EHS Program Manager, at 408-361-4954.

Sincerely,

DS
Signed by:
Chr Schneider
BFFA23815E88434...

Initial
CG

Christopher Schneider
Plant Manager
Metcalf Energy Center, LLC

Attachments: Attachment A: Ammonia Slip Formula and Calculations
Attachment B: Process and Emissions Data

Cc: Erin Phillips BAAQMD via email attachment
Anwar Ali CEC AQ-34 via email attachment
EHSWalnutCreek@calpine.com via email attachment
CICS INC104058

Attachment A: Ammonia Emission Formula and Calculations

NH3 Slip – ppmvd for Metcalf

NH3 Slip (ppmvd @15% O2)

$$NH_{3slip} = ((NH_{3Inlet} - (NOx_{in} - NOx_{out}))* ((20.9-15)/(20.9-\%O_2)))*b$$

$$NH_{3Inlet} = ((NH_{3inj} * a)/Q * F_d * 4.4096x10^{-8})) * ((20.9-\%O_2)/20.9)$$

- NH_{3Inlet} in ppmvd
- Nox_{in} = SCR NOx ppm
- NOxout=Stack NOx in ppm
- $\%O_2$ = Measured O_2%
- NH_{3Inj}=NH3 Flow Rate in lb/hr
- Q = Heat Input in mmBtu/hr
- F_d =Fuel Factor 8710 scf/mmBtu
- a = NH_3 Concentration %/wt%
- b = Source Testing correction factor

Reference: Provided by Calpine for Metcalf
Units: ppmvd

CeDAR 1-Hour Data

Data for 7/13/2025 12 AM thru 7/13/2025 23 PM

PROPRIETARY AND CONFIDENTIAL

Timestamp	(Turbine-1) Process Code 1-Hr	(Turbine-1) BAAQMD-NOx ppm 1-Hr	(Turbine-1) SCR NOx ppm 1-Hr	ESTIMATED SCR NOx PPM	(Turbine-1) NH3 Slip Correction Factor 1-Hr	(Turbine-1) NH3 ppm @15% O2 1-Hr	(Turbine-1) NH3 Slip ppm @15% O2 3-Hr Rolling	(Turbine-1) 75 O2% 1-Hr	(Turbine-1) 40CFR75-Total Heat Input mmBtu 1-Hr Total	(Turbine-1) Megawatts 1-Hr	(Turbine-1) NH3 Flow 1-Hr lb/hr	RE-CALCULATED NH3 INLET	RE-CALCULATED NH3 SLIP	RE-CALCULATED NH3 SLIP 3-HR ROLLING
7/13/2025 0:00	8	1.9	23.0 <74>	**22.4**	0.35	3.4 <74>	3.4 <74>	14	1897	173	253	32.58	3.6	**3.4**
7/13/2025 1:00	8	1.9	22.8 <74>	**22.4**	0.35	3.4 <74>	3.4 <74>	14	1899	173	252	32.38	3.5	**3.4**
7/13/2025 2:00	8	1.9	22.4 <74>	**22.4**	0.35	3.3 <74>	3.4 <74>	14	1896	173	247	31.85	3.4	**3.5**
7/13/2025 3:00	8	1.9	22.9 <74>	**22.4**	0.35	3.5 <74>	3.4 <74>	14	1886	175	255	32.51	3.6	**3.5**
7/13/2025 4:00	8	1.9	22.4 <74>	**22.4**	0.35	3.5 <74>	3.4 <74>	14	1893	176	252	32.05	3.5	**3.5**
7/13/2025 5:00	8	1.9	20.9 <74>	**22.4**	0.37	3.0 <74>	3.3 <74>	14	1826	166	219	28.92	2.7	**3.2**
7/13/2025 6:00	4	0.0	118.1 <74>	**22.4**	0.43	0.4 <74>	0.00 <74>	14	905	135	411	107.60	31.8	**12.8**
7/13/2025 7:00	13	0.0 <13>	197.9 <13>	-	0.46	0.0 <13>	0.00 <13>	20.9 <13>	0.0 <13>	0.0 <13>	0.0 <13>	-	-	-
7/13/2025 8:00	13	0.0 <13>	112.9 <13>	-	0.46	0.0 <13>	0.00 <13>	20.9 <13>	0.0 <13>	0.0 <13>	0.0 <13>	-	-	-
7/13/2025 9:00	13	10.8 <29>	53.6 <29>	-	0.46	0.0 <29>	0.00 <13>	15.8 <29>	0.0 <13>	0.0 <13>	0.0 <13>	-	-	-
7/13/2025 10:00	3	1.8	22.4	-	0.46	7.9	0.00 <34>	17	373	35	64	-	-	-
7/13/2025 11:00	3	1.9	23.2	-	0.46	2	0.40 <34>	14.5	1302	108	146	-	-	-
7/13/2025 12:00	8	1.9	20.1	-	0.43	2.6	1.1	14.2	1506	133	163	-	-	-
7/13/2025 13:00	8	1.9	22.7	-	0.35	2.5	2.0	13.7	1846	162	218	-	-	-
7/13/2025 14:00	8	2.0	21.7	-	0.35	2.1	2.4	13.6	1886	161	201	-	-	-
7/13/2025 15:00	8	2.1	21.7	-	0.35	2.1	2.2	13.6	1907	164	203	-	-	-
7/13/2025 16:00	8	2.1	21.5	-	0.35	2	2.1	13.6	1910	163	198	-	-	-
7/13/2025 17:00	8	2.1	22.2	-	0.35	2.2	2.1	13.3	1993	167	212	-	-	-
7/13/2025 18:00	8	2.2	22.9	-	0.35	2.3	2.2	13.3	2006	168	221	-	-	-
7/13/2025 19:00	8	2.1	23.2	-	0.35	2.4	2.3	13.3	2016	170	229	-	-	-
7/13/2025 20:00	8	2.1	23.1	-	0.35	2.4	2.4	13.4	2035	172	230	-	-	-
7/13/2025 21:00	8	2.0	22.2	-	0.35	2.2	2.3	13.4	1971	166	212	-	-	-
7/13/2025 22:00	8	2.1	23.2	-	0.35	2.5	2.4	13.6	1932	167	229	-	-	-
7/13/2025 23:00	8	1.9	23.1	-	0.35	2.5	2.4	13.8	1928	171	232	-	-	-

Attachment B: Process and Emissions Data

SCR NO_X reading normal, begins increasing with increasing load

DAHS alarms high NH_3 flow

DCS alarms NH_3 leak

CT1 e-stopped

Timestamp	(Turbine-1) Process Code 1-Min	(Turbine-1) CT Gas Flow klb/hr 1-Min	(Turbine-1) Megawatts 1-Min	(Turbine-1) SCR NOx ppm 1-Min	(Turbine-1) NH3 Flow 1-Min lb/hr	(Turbine-1) NOx ppm @15% O2 1-Min	(Turbine-1) NH3 Slip ppm 1-Min
7/13/2025 5:57	8	63.1	124.6	23.0 <74>	173.86	1.43	3.19 <74>
7/13/2025 5:58	8	64.1	127.8	23.9 <74>	179.86	1.42	3.02 <74>
7/13/2025 5:59	8	66.2	133.3	25.1 <74>	192.96	1.41	2.88 <74>
7/13/2025 6:00	8	68.4	139.7	27.3 <74>	213.66	1.4	2.72 <74>
7/13/2025 6:01	8	70.7	145.6	28.0 <74>	226.88	1.34	2.08 <74>
7/13/2025 6:02	8	73.1	151.7	29.3 <74>	244.71	1.31	2.11 <74>
7/13/2025 6:03	8	75.4	157.2	30.8 <74>	261.15	1.27	2.04 <74>
7/13/2025 6:04	8	77.5	162.8	33.1 <74>	278.14	1.19	1.80 <74>
7/13/2025 6:05	8	79.5	168.1	36.5 <74>	305.08	1.07	1.59 <74>
7/13/2025 6:06	8	81.5	172.6	39.7 <74>	332.01	0.97	1.34 <74>
7/13/2025 6:07	8	82.6	175.7	43.8 <74>	360.47	0.83	0.88 <74>
7/13/2025 6:08	8	82.5	175.1	47.8 <74>	387.2	0.79	0.89 <74>
7/13/2025 6:09	8	82	174.2	51.8 <74>	413.57	0.66	0.64 <74>
7/13/2025 6:10	8	79.9	168.8	55.8 <74>	433.68	0.52	0.35 <74>
7/13/2025 6:11	8	77.3	162.7	57.5 <74>	433.51	0.35	0.00 <74>
7/13/2025 6:12	8	75.2	157	62.5 <74>	456.91	0.28	0.00 <74>
7/13/2025 6:13	8	72.8	151	65.9 <74>	472.4	0.2	0.12 <74>
7/13/2025 6:14	8	70.5	145	68.6 <74>	482	0.12	0.22 <74>
7/13/2025 6:15	8	68.2	139.1	70.4 <74>	478.49	0.08	0.58 <74>
7/13/2025 6:16	8	66	133	90.3 <74>	526	0.04	0.00 <74>
7/13/2025 6:17	8	63.8	126.7	102.9 <74>	542.53	0.01	0.00 <74>
7/13/2025 6:18	8	62.1	122	120.5 <74>	547.75	0	0.00 <74>
7/13/2025 6:19	8	60.6	117.4	142.5 <74>	549.4	0	0.00 <74>
7/13/2025 6:20	8	59.5	114.7	164.9 <74>	549.4	0	0.00 <74>
7/13/2025 6:21	8	58.8	112.7	191.3 <74>	548.67	0	0.00 <74>
7/13/2025 6:22	8	58.7	112	197.9 <74>	542.46	0	0.00 <74>
7/13/2025 6:23	8	58.7	112	197.9 <74>	533.95	0	0.00 <74>
7/13/2025 6:24	8	58.6	111.9	197.8 <74>	527.12	0	0.00 <74>
7/13/2025 6:25	8	58.6	111.9	197.8 <74>	517.84	0	0.00 <74>
7/13/2025 6:26	8	58.7	112.1	197.9 <74>	509.97	0	0.00 <74>
7/13/2025 6:27	8	58.7	111.8	197.9 <74>	504.34	0	0.00 <74>
7/13/2025 6:28	8	58.7	111.9	197.8 <74>	495.25	0	0.00 <74>
7/13/2025 6:29	8	58.6	111.8	197.8 <74>	487.62	0	0.00 <74>
7/13/2025 6:30	8	58.7	112	197.8 <74>	478.17	0	0.00 <74>
7/13/2025 6:31	8	58.6	112	197.8 <74>	386.53	0	0.00 <74>
7/13/2025 6:32	8	58.5	111.8	197.8 <74>	120.24	0	0.00 <74>
7/13/2025 6:33	8	58.7	111.9	197.8 <74>	112.28	0	0.00 <74>
7/13/2025 6:34	8	58.7	112	197.8 <74>	111.03	0.02	0.00 <74>
7/13/2025 6:35	4	11.2 <13>	18.7 <13>	197.8 <13>	59.75 <13>	0.06 <13>	0.00 <13>
7/13/2025 6:36	13	0.1 <13>	0.0 <13>	197.8 <13>	0.00 <13>	0.03 <13>	0.00 <13>

Metcalf Energy Center, LLC.

1 Blanchard Road
Coyote, CA 95013

VIA EMAIL

October 6, 2025

Director, Enforcement and Compliance Division
Bay Area Air District
375 Beale Street, Suite 600
San Francisco, CA 94105
compliance@baaqmd.gov

RE: Metcalf Energy Center, Permit No. B2183
Major Facility Review Permit (Title V Permit)
30-Day Title V Non-Compliance Report

To Whom It May Concern:

In accordance with the Major Facility Review Permit (Title V Permit) for the Metcalf Energy Center (the "Facility"), this letter presents the 30-day follow-up report of a permit deviation as required by Section I.F. of the Title V Permit.

The Title V 10-day deviation notification, as required by Section I. F. of the Title V Permit, was submitted on September 12, 2025.

Event Description

On August 6, 2025, a source test was conducted on the S-3 Combustion Gas Turbine, which included the biennial testing for formaldehyde, as required in Condition 33 of the Title V Permit.

On September 10th, 2025, the Facility was notified by Montrose Environmental (the source test contractor) that the formaldehyde laboratory results from one of the samples taken for the third sample runs had an abnormally high result, most likely from contamination and not representative of actual emissions.

Compliance Status

There was no deviation from Title V permit conditions. The facility is currently in compliance with the conditions of the Title V air permit.

The Facility has submitted the final source test report to Bay Area Air District's Source Test Division on October 2, 2025. In the final report, the results of the third run were excluded in the calculation of the average results presented in Table 1-4, Formaldehyde Summary. The results of each of the three runs are presented in Table 4-4, Formaldehyde Results Summary, with the third run being excluded for the purposes of test series average. A copy of Table 1-4, Formaldehyde Summary and Table 4-4, Formaldehyde Results Summary, are included as Attachment A and B for reference.

Investigation and Cause Determination

As shown below, sample 3B-FROM-MAX from the third run had an abnormally high value for formaldehyde as compared to all other values. Montrose Environmental excluded run 3 from the emissions calculations consistent with Montrose Environmental's reporting protocols.

CARB Method 430

Client	: Montrose AQS	Sampling Date :	08/05-06/2025
Client Project Name	: Calpine MEC	Receiving Date :	08/12/2025
AAC Project No.	: 252019 Rev 1	Extraction Date :	08/13/2025
Analyst	: RS	Analysis Date :	08/20/2025
Units	: ug/sample	Reporting Date :	09/11/2025

Client Sample ID	AAC Sample ID	Formaldehyde (ug/sample)	SRL (ug/sample)
1FB-FROM-MAX	252019-79150	<SRL	0.100
1A-FROM-MAX	252019-79151	0.450	0.100
1B-FROM-MAX	252019-79152	0.396	0.100
2A-FROM-MAX	252019-79153	0.600	0.100
2B-FROM-MAX	252019-79154	0.242	0.100
2FB-FROM-MAX	252019-79155	<SRL	0.250
3A-Vial1-FROM-MAX	252019-79156	0.476	0.100
3A-Vial2-FROM-MAX	252019-79157	0.206	0.100
3B-FROM-MAX	252019-79158	22.0	0.100
3FB-FROM-MAX	252019-79159	<SRL	0.250
AAC Trip Blank		<SRL	0.100
AAC Trip Spike		103 % Recovery	0.250

<SRL-compound was analyzed for but not detected at or above the SRL (Sample Reporting Limit)
SRL (ug/sample) = MRL (0.025ug/mL) x Sample Volume (mL) x Analysis Dilution Factor x Method Dilution Factor
All samples were blank corrected for Formaldehyde using the method blank value.

Montrose Environmental provided the following explanation in their source test report:

> *Since there is no evidence of breakthrough, the first impinger in a series' pollutant level being lower than that of the second impinger, it is reasonable to assume that the high results of the third sample, were likely caused by contamination in either the pre-test preparation or post-test recovery stage of the third run. The lack of evidence of breakthrough makes it highly unlikely that the results of the third run are representative of stack conditions during the testing.*

Preventative Actions

The Facility will continue to work with our testing contractors to ensure that all testing and sampling protocols are properly implemented and followed.

Certification

As the Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

If you have any questions or require additional information, please contact Rosemary Silva, EHS Project Manager III, at 408-361-4954 or silvaro@calpine.com.

DS JG

Initial CG

Sincerely,

Signed by:
Chri Schneider
BFFA23815E88434...
Christopher Schneider
Designated Representative and Plant Manager
Metcalf Energy Center, LLC

Attachments: Attachment A: Table 1-4, Formaldehyde Summary
Attachment B: Table 4-4, Formaldehyde Results Summary

CC: Region IX, EPA via email attachment
Anwar Ali, CEC AQ-34 via email attachment
Erin Phillips, BAAD via email attachment
EHSWalnutCreek@calpine.com
CICS – INC104143

Attachment A: Table 1-4, Formaldehyde Summary

Calpine Corporation – Metcalf Energy Center
2025 Compliance and RATA Source Test Report

TABLE 1-4
PAH SUMMARY
CALPINE METCALF ENERGY CENTER
TURBINE 2 MAXIMUM LOAD WITH PAG
AUGUST 5-6, 2025

Test Run:	Unit #2	Limit
Unit Operation Data:		
Gas turbine gross load, MW	281	--
Fuel heat content, Btu/scf	1,037	--
CT fuel flow rate, scfh	1,756,730	--
CT heat input, MMBtu/hr	1,791.6	--
DB fuel flow rate, scfh	1,626.6	--
DB heat input, MMBtu/hr	165.9	--
Total fuel flow rate, scfh	1,919,390	--
Total heat input, MMBtu/hr	1,957.8	2,124
Steam injection rate, lb/hr	61,478.6	--
Ammonia injection rate, lb/hr	180.87	--
Fuel sulfur, gr/100 scf	0.144	--
Stack Gas Data:		
O_2, % volume dry	13.8	--
CO_2, % volume dry	4.2	--
Stack gas moisture, % vol	10.9	--
Stack gas flow rate, dscfm	753,752	--
Total PAHs		
lb/hr	2E-06	--
lb/MMBtu	1E-09	--
lb/yr	0.045	22.8

Notes: Stack gas flow rate, in terms of dscfm, was calculated stoichiometrically using the HHV and Fd values from fuel sampling. Values found to be below the detection limit of the analytical method are reported here at the detection limit ± the detection limit. Emissions in units of lb/year is calculated based on the combined annual heat input rate of both turbines (35,274,060 MMBtu/year).

Attachment B: Table 4-4, Formaldehyde Results Summary

Calpine Corporation – Metcalf Energy Center
2025 Compliance and RATA Source Test Report

TABLE 4-4
FORMALDEHYDE RESULTS SUMMARY
CALPINE METCALF ENERGY CENTER
TURBINE 2, MAXIMUM LOAD WITH PAG

Test Run:	1-FORM-CT2-MAX	2-FORM-CT2-MAX	3-FORM-CT2-MAX	Average
Date:	8/5/25	8/5/25	8/6/25	--
Time:	0824-1224	1312-1512	0807-1207	--
Unit Operation Data:				
Gas turbine gross load, MW	280	282	281	281
Fuel heat content, Btu/scf	1,037	1,037	1,037	1,037
CT fuel flow rate, scfh	1,730,930	1,769,510	1,769,750	1,756,730
CT heat input, MMBtu/hr	1,765.6	1804.0	1805.1	1,791.6
DB fuel flow rate, scfh	1,630.7	1,545.9	1,703.2	1,626.6
DB heat input, MMBtu/hr	166.3	157.7	173.7	165.9
Total fuel flow rate, scfh	1,894,000	1,924,100	1,940,070	1,919,390
Total heat input, MMBtu/hr	1,931.9	1,962.60	1,978.90	1,957.8
Steam injection rate, lb/hr	59,463.6	64,969.2	60,003.0	61,478.6
Ammonia injection rate, lb/hr	163.05	180.93	198.62	180.87
Sampling Data				
Gas meter calibration factor, Y	1.0064	1.0064	1.0064	1.0064
Gas meter sample vol., liters	240.055	240.018	241.196	240.423
Avg Meter temp, F	80.4	86.4	83.4	83.4
Barometric Temperature, F	29.93	29.93	29.65	29.84
Total fuel flow rate, scfh	749,257	758,961	753,037	753,752
Testing Calculations:				
Stack gas molecular weight	29.22	29.21	29.24	29.22
Sample vol, liters	240.06	240.02	241.20	240.42
Sample vol, standard liters	237.02	234.38	234.62	235.34
Sample vol dscm	0.2370	0.2344	0.2346	0.2353
Formaldehyde:				
mg/dscm	0.004	0.004	0.097	0.004*
ppm	0.003	0.003	0.078	0.003*
ppb	2.9	2.9	77.8	2.880*
lb/hr	1.0E-02	1.1E-02	3.4E-01	1.2E-01*
lb/MMbtu	5.4E-06	5.5E-06	1.8E-04	5.44E-06*
lb/year	--	--	--	192*

Notes: * The results from Run 3 have been excluded from the averages because probable contamination and were not likely representative of actual stack conditions. Result averages are only from Runs 1 and 2 only. See Section 4.1, Field Test Deviations and Exceptions for detailed explanation.