# City of Vernon

**LIGHT & POWER DEPARTMENT**
Donal O'Callaghan, Director of Light & Power

December 19, 2007

Steve Munro
Compliance Project Manager
Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Subject: Malburg Generating Station (Docket 01-AFC-25C)
Petition to Modify the Malburg Generating Station Project Final Decision

Dear Mr. Munro:

Enclosed is City of Vernon's petition to amend the California Energy Commission's license for the Malburg Generating Station to include new cold startup emission rates. These new cold startup emission rates are consistent with emission measurements recorded by the facility's emission monitoring system and other similar combustion turbine projects licensed by the Commission. As proposed, the project modifications will not result in any significant environmental impacts. All applicable laws, ordinances, regulations, and standards will be compiled with and only one Condition of Certification (AQ-C10) needs to be modified for the new cold startup emissions. This proposed change in Condition AQ-C10 will not require modification of any South Coast Air Quality Management District conditions.

If you have any questions regarding this petition, please contact Dr. Krishna Nand at (323) 583-8811 ext. 211.

Sincerely,

Donal O'Callaghan
Director of Light & Power

Enclosures

4305 Santa Fe Avenue, Vernon, California 90058 Telephone (323) 583-8811 Fax (323) 826-1425

*Exclusively Industrial*

*Final*

# City of Vernon
# Malburg Generating Station
# Proposed Amendment

Prepared for

**California Energy Commission**

December 2007

**CH2MHILL**
2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833

# Contents

SECTION 1

# Introduction

## 1.1 Background

On December 21, 2001, the City of Vernon (City) filed an Application for Certification (AFC) with the California Energy Commission (CEC) seeking approval to construct and operate the Malburg Generating Station (MGS), a 134-megawatt (MW) nominal combined-cycle electric generation facility. The CEC issued a final decision for the MGS on May 20, 2003. The City began construction activities in 2003, with commercial operations beginning in 2005. The information used to prepare the AFC, and relied on by the CEC, was based on the best available data, and included estimates by equipment manufacturers. In the case of air quality emission estimates, the City requested turbine operating, startup, and shutdown emissions estimates from Alstrom (the turbine vendor selected for the MGS). These emission estimates were used by the CEC to develop Conditions of Certification (COCs). COC AQ-C10 (of the CEC Decision) contains air emission limitations on an hourly, daily, and annual basis, including startup and shutdown periods. The hourly startup emission estimates used in COC AQ-C10 are for a cold startup (a startup where the turbines have not been in operation for an extended time). As the MGS facility operates almost daily, the number of cold startups that have occurred since commercial operations in October 2005 is nine per unit. After reviewing the continuous emissions monitoring data for these cold startup periods, the City determined that it was not able to comply with COC AQ-C10 on a continuous basis. Therefore, the City is requesting an amendment to COC AQ-C10.

## 1.2 Description of Proposed Amendment

The City is requesting to amend COC AQ-C10 of the CEC Decision by increasing the emission limits presented in the condition. No physical or operational changes to the MGS are proposed.

## 1.3 Summary of Environmental Impacts

Section 1769 (a)(1)(E) of the CEC Siting Regulations requires that an analysis be conducted that addresses impacts that the modification might have on the environment and proposed measures to mitigate any significant adverse impacts. In addition, Section 1769 (a)(1)(F) of the Siting Regulations requires a discussion of the impacts the modification might have on the project's ability to comply with applicable laws, ordinances, regulations, and standards (LORS).

The proposed change to COC AQ-C10 will allow increases in short-term oxides of nitrogen ($NO_X$) and carbon monoxide (CO) emission rates, but will not affect other pollutants. The proposed change would not impact other environmental issue areas (e.g., biological resources, cultural resources, land use, noise, soil and water, paleontological resources, and so forth). Short-term increases in $NO_X$ or CO emissions are not expected to cause or contribute to the violation of either state or federal ambient air quality standards.

Section 2 of this Amendment provides a description of the Project Amendment. Section 3 includes a detailed analysis of the potential environmental impacts of the proposed design changes, as well as a discussion of the consistency of the modification with LORS. Section 3 concludes that there will be no significant environmental impacts associated with the Amendment, and that the project as amended will comply with applicable LORS. Proposed modifications to the conditions of certification are provided in Section 4.

As the startup emissions are not specifically addressed in the South Coast Air Quality Management District's conditions, the City is not proposing to modify any of these conditions.

## 1.4 Consistency of Amendment with License

Section 1769 (a)(1)(D) of the CEC Siting Regulations requires a discussion of the Amendment's consistency with LORS and whether the modifications are based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision. If the project is no longer consistent with the CEC license, an explanation of why the modification should be permitted must be provided. In the sections that follow, the City provides an explanation of the proposed modifications, rationale for the modifications, and a LORS compliance analysis. Proposed modifications to the existing COC AQ-C10 are included in Section 4.

SECTION 2

# Description of Project Amendment

Consistent with CEC Siting Regulations, Sections 1769 (a)(1)(A) and 1769(a)(1)(B), this section includes a complete description of the project modifications, as well as the necessity for the amendment.

## 2.1 Revised Startup Emissions

During the preparation of compliance reports, the City identified a couple of instances where the $NO_X$ and CO emission rates exceeded limitations contained in COC AQ-C10. After further research, it was determined that when the turbines started up after an extended shutdown, it resulted in air emissions that were greater than the emission estimates used in the preparation of the AFC. The City has explored control measures with the turbine vendors and has not identified any practical solution; therefore, it is requesting an increase in the maximum hourly and daily $NO_X$ and CO emission limits contained in COC AQ-C10.

## 2.2 Necessity of Proposed Change

Sections 1769 (a)(1)(B) and 1769(a)(1)(C) of the CEC Siting Regulations require a discussion of the necessity for the proposed changes to the project and whether this modification is based on information that was known by the petitioner during the CEC licensing proceeding. During the licensing period, the City requested startup data from the turbine vendor. These data were used as the basis for project licensing and were considered the best available data at the time.

SECTION 3

# Environmental Analysis of the Project Changes

This proposed Amendment, requesting to increase cold startup emissions for $NO_X$ and CO, is only expected to impact air quality resources. No other resource areas would be impacted from the proposed change, and are therefore, not analyzed. This request will not require any changes to fuel or water usage. The following section presents the revised startup emissions, ambient air quality impact assessment, mitigation measures, cumulative impact assessment, and a discussion of LORS compliance.

## 3.1 Air Quality

This section reviews the potential air quality impacts associated with the proposed change to the startup $NO_X$ and CO emissions. The following areas were reviewed:

- Operational Emissions Estimate
- Air Quality Impacts
- Mitigation Measures
- Cumulative Impacts
- Compliance with LORS
- Conclusions

### 3.1.1 Proposed Emissions

#### 3.1.1.1 Operational Emissions

The proposed increase in startup $NO_X$ and CO emissions will increase the hourly, daily, and annual emissions. Based on a review of MGS Continuous Emission Monitoring System (CEMS) data and other Alstrom turbines licensed by the CEC, revised emission estimates were prepared. Tables 3.1-1, 3.1-2, and 3.1-3 present a summary of the maximum $NO_X$ and CO hourly, daily, monthly, and annual emissions, including startup and shutdown emissions. Emissions for other air pollutants are not impacted by the increase in startup emissions and are therefore not presented to avoid confusion. The emissions estimates presented in Tables 3.1-1, 3.1-2, and 3.1-3 show that there will be an increase in $NO_X$ and CO emissions relative to the emissions licensed by the CEC.

It should be noted that the annual emissions increase in CO is above the permitted CO emission rate presented in COC AQ-5 of 7,633 pounds per month.[1] However, CO emissions cannot increase above the monthly permit limits contained in COC AQ-5.

[1] Assuming the project emits 7,633 lb CO/Month, the annual CO emissions would be 91,596 lb/year.

**TABLE 3.1-1**
Revised Hourly $NO_X$ and CO Emissions, lb/hr

| | Gas Turbines (2) | Cooling Tower | Firewater Pump | Facility Total | Notes |
|---|---|---|---|---|---|
| CO | 179.0 | 0 | 0.59 | 179.6 | a,b |
| $NO_X$ | 74.2 | 0 | 1.73 | 75.93 | a,b |

[a]Gas turbine emission data are from Roseville Energy Park Facility (AFC-03-AFC-1), Commission Decision, April 2005 (page 150).

[b]The firewater pump is being tested 0.5 hour.

**TABLE 3.1-2**
Revised Daily $NO_X$ and CO Emissions, lb/day

| | Gas Turbines (2) | Cooling Tower | Firewater Pump | Facility Total | Notes |
|---|---|---|---|---|---|
| CO | 463.2 | 0 | 0.59 | 463.8 | a,b |
| $NO_X$ | 322.6 | 0 | 1.73 | 324.4 | a,b |

[a]The gas turbines are undergoing one cold startup (2 hours) per day and 22 hours per day full load operation with duct firing.

[b]The firewater pump is being tested 0.5 hour/day.

**TABLE 3.1-3**
Revised Annual $NO_X$ and CO Emissions, lb/year

| | Gas Turbines (2) | Cooling Tower | Firewater Pump | Facility Total | Tons/yr | Notes |
|---|---|---|---|---|---|---|
| CO | 169,053 | 0 | 235 | 169,288 | 84.6 | a,b |
| $NO_X$ | 117,764 | 0 | 689 | 118,453 | 59.2 | a,b |

[a]Based on daily emission presented in Table 3.1-2 multiplied by 365 days per year.

[b]The firewater pump is being tested 199 hours/year.

## 3.1.2 Air Quality Impacts

Potential changes in air quality impacts have been evaluated for the operational phase of the project. In order to evaluate the change in the $NO_X$ and CO ambient air quality impacts associated with the revised startup emission rates, the City used the scaling technique that uses the emissions and modeling impact data from the MGS (01-AFC-25) Final Staff Assessment (FSA) to predict revised ambient air quality impacts. FSA Air Quality Tables 9 through 12, and 16 were used to convert the ambient air quality impact results to a microgram per cubic meter per pound basis, which was then multiplied by the proposed $NO_2$ and CO emission rates to predict 1-hour $NO_2$ and CO impacts, 8-hour CO impacts, and annual $NO_2$ impacts.

The background ambient air quality data used in this analysis are presented in Table 3.1-4 and represent the highest $NO_2$ and CO ambient air quality data from the Lynnwood and North Main air quality monitoring stations.

**TABLE 3.1-4**
Background Air Concentrations for the Malburg Generating Station[a] 2004 – 2006

| Pollutant | Averaging Time | 2004 | | 2005 | | 2006 | | Maximum |
|---|---|---|---|---|---|---|---|---|
| | | ppm | µg/m³ | ppm | µg/m³ | ppm | µg/m³ | µg/m³ |
| $NO_2$ | 1-hour | 0.1 | 188 | 0.11 | 207 | 0.14 | 263 | 263 |
| | Annual | 0.0301 | 56.6 | 0.0312 | 58.7 | 0.0306 | 57.6 | 58.7 |
| CO | 1-hour | 10 | 11,452 | 7 | 8,016 | 8 | 9,161 | 11,452 |
| | 8-hour | 6.7 | 7,673 | 5.9 | 6,757 | 6.4 | 7,330 | 7,673 |

[a]Conversion from ppm to µg/m³ at 25° Celsius and 760 torr.

Sources: SCAQMD, http://www.aqmd.gov/smog/historicaldata.htm

Table 3.1-5 presents a comparison of the ambient air quality impacts resulting from the proposed startup emission rates to the ambient air quality standards. The background concentrations shown in Table 3.1-5 are based on maximum data presented in Table 3.1-4. The emission rates used for the 1-hour impact assessment are from Table 3.1-1. The 8-hour CO emission rate used in this assessment included 2 hours of startup emissions, plus 6 hours of duct-firing CO emissions. The annual $NO_X$ emissions used are from Table 3.1-3. Table 3.1-5 shows that the project, as proposed, does not result in significant air quality impacts and continues to comply with ambient air quality standards.

**TABLE 3.1-5**
Comparison of Malburg Generating Station's Revised Ambient Air Quality Impacts to Ambient Air Quality Standards

| Pollutant | Averaging Time | Maximum Project Impact (µg/m³) | Background Concentrations (µg/m³) | Total Operational Impact (µg/m³) | State Standard (µg/m³) | Federal Standard (µg/m³) | SCAQMD Significance Threshold (µg/m³) |
|---|---|---|---|---|---|---|---|
| $NO_2$ | 1-hour | 30.9 | 263 | 293.9 | 470 | -- | -- |
| | Annual[a] | 0.65 | 58.7 | 59.4 | -- | 100 | -- |
| CO | 1-hour | 81.9 | -- | 81.9 | -- | -- | 1,100 |
| | 8-hour[b] | 2.1 | 7,673 | 7675 | 23,000 | 40,000 | -- |

[a]Based on the annual $NO_X$ emission presented in Table 3.1-3.

[b]Assumed 2 hours of cold start CO emissions (89.5 lb/hr * 2) plus 6 hours of full load duct-firing CO emissions (2.4 lb/hr).

## 3.1.3 Mitigation Measures

The City provided mitigation in the form of emission reduction credits (ERCs) for the operations of the MGS prior to the issuance of the license. The quantities of ERCs provided are reflected in COC AQ-5, on a monthly basis, and the City is not requesting a revision to COC AQ-5. Furthermore, any increase in $NO_X$ emissions is required to be mitigated by

demonstrating that the City holds sufficient RTCs in an amount equal to the annual $NO_X$ emissions, consistent with COC AQ-32. Therefore, no additional mitigation is necessary.

### 3.1.4 Cumulative Impacts

Because no new ambient impacts are anticipated as a result of the proposed changes to the project, no significant change to the original assessment of the cumulative air quality impacts are expected.

### 3.1.5 Compliance with LORS

The MGS is in compliance with all applicable LORS, with the exception of COC AQ-C10. With the CEC approval of the proposed changes to COC AQ-C10, the MGS will be in compliance with all applicable LORS.

### 3.1.6 Conclusions

With the proposed amendments to the cold startup emissions, the CEC staff's conclusions in the FSA and Final Decisions that air quality impacts from the project are less than significant, will still be applicable.

## 3.2 Public Health

The public health impacts assessed during the licensing of the MGS indicated that the acute, chronic, and cancer risks associated with the operation of the MGS project were significantly below the CEC's significant impact levels.[2] The proposed increase in air emissions is not expected to increase the operation of the turbines, nor are they expected to increase the amount of fuel fired (the basis for calculating the MGS non-criteria pollutant emissions that drive the health risk assessment). Therefore, no significant public health impacts are expected from the proposed changes to COC AQ-C10.

For the original project, the CEC determined that the MGS project would not have a significant direct or cumulative impact on public health.[3] As the proposed change to the MGS license is not expected to increase public health impacts above those analyzed during licensing, no significant cumulative public health impacts are expected.

### 3.2.1 Compliance with LORS

The proposed changes to the MGS project will be in compliance with all applicable LORS.

[2] MGS Final Staff Assessment, Public Health Table 2, page 4.7-13.

[3] MGS Final Staff Assessment, Public Health Section, page 4.7-14.

SECTION 4

# Proposed Modifications to the Conditions of Certification

Consistent with the requirements of the CEC Siting Regulations Section 1769 (a)(1)(A), this section addresses the proposed modifications to the project's COC.

The proposed modifications to COC AQ-C10 is presented below with deletions in strike-out and insertions in underline.

**AQ-C10** The City of Vernon shall commission and operate the Malburg Generation Station within the following emission limits.

***Commissioning***

During the first year of commissioning and operation, the following emission limits shall apply.

**Annual Commissioning Emission Limits**

Units are in pounds per year

| | Gas Turbines (2) | Cooling Tower | Firewater Pump | Facility Total | Assumptions |
|---|---|---|---|---|---|
| CO | 112,743 | 0 | 478 | 113,221 | a,b,c |
| $NO_x$ | 229,531 | 0 | 1,377 | 230,908 | a,b,c |
| PM10 | 48,873 | 2,190 | 58 | 51,121 | a,b,c |
| ROG | 40,518 | 0 | 35 | 40,553 | a,b,c |
| $SO_x$ | 4,294 | 0 | 2 | 4,296 | a,b,c |
| Ammonia | 49,514 | 0 | 0 | 49,514 | a,b,c |

Assumptions

a The gas turbines are undergoing initial commissioning for three months (2,160 hours) then 3 cold startups, 39 warm startups, 42 shutdowns and 4,355 hours at full load with the duct burners on @ 65 deg F.

b The cooling tower at full load for 8760 hours/year,

c The Firewater pump is being tested 199 hours/year.

***Post Commissioning***

After the end of the commissioning period, the following hourly and daily emission limits shall apply. The following annual emission limits shall only apply until after the first calendar year of operation is complete.

## Hourly Emission Limits

Units are in pounds per hour

| | Gas Turbines (2) | Cooling Tower | Firewater Pump | Facility Total | Assumptions |
|---|---|---|---|---|---|
| CO | ~~48.6~~179.0 | 0 | 0.59 | ~~49.19~~179.6 | a,c,d |
| $NO_X$ | ~~26.2~~74.2 | 0 | 1.73 | ~~27.93~~75.9 | a,c,d |
| PM10 | 7.78 | 0.26 | 0.08 | 8.12 | b,c,d |
| VOC | 3.3 | 0 | 0.05 | 3.35 | a,c,d |
| SOx | 0.3 | 0 | 0.002 | 0.30 | b,c,d |
| Ammonia | 7.6 | 0 | 0.00 | 7.60 | b,c,d |

Assumptions

a The gas turbines are undergoing a cold startup ~~@ 38 deg F~~.
b The gas turbines are at full load @ 38 deg F with the duct burners on.
c The cooling tower is at full load,
d The Firewater pump is being tested for 1/2 hour.

## Daily Emission Limits

Units are in pounds per day

| | Gas Turbines (2) | Cooling Tower | Firewater Pump | Facility Total | Assumptions |
|---|---|---|---|---|---|
| CO | ~~104.00~~463.2 | 0 | 0.59 | ~~104.59~~463.8 | a,d,e, |
| $NO_x$ | ~~175.00~~322.6 | 0 | 1.73 | ~~176.73~~324.4 | a,d,e, |
| PM10 | 158.00 | 6.20 | 0.08 | 164.28 | a,d,e |
| VOC | 36.00 | 0 | 0.05 | 36.05 | a,d,e |
| $SO_x$ | 6.00 | 0 | 0.002 | 6.00 | a,d,e |
| Ammonia | 182.4 | 0 | 0.00 | 182.40 | a,d,e |

Assumptions

a The gas turbines are undergoing 1 ~~warm~~cold startup (~~1.5~~2 hours) per ~~month, 8 hours/~~day and 22 hours of full load operation with duct firing~~, 16 hours/day full load without duct firing and 0.5 hours shutdown per month~~ @ 65 deg F ~~averaged for 2931 days/month~~.
b The gas turbines are at full load for 24 hours @ 38 deg F with the duct burners on.
c The gas turbines are undergoing cold startup (2 hours) and baseload operation for 22 hours @ 38 deg F.
d The cooling tower is at full load for 24 hours/day
e The Firewater pump is being tested 0.5 hours/day

**Annual Emission Limits**
Units are in pounds per year

| | Gas Turbines (2) | Cooling Tower | Firewater Pump | Facility Total | | Assumptions |
|---|---|---|---|---|---|---|
| | | | | Lbs/yr | Tons/yr | |
| CO | ~~37,145~~169,053 | 0 | 235 | ~~37,380~~169,288 | ~~18.66~~84.6 | a,c,d |
| $NO_x$ | ~~52,674~~117,764 | 0 | 689 | ~~53,363~~118,453 | ~~26.68~~59.2 | a,c,d |
| PM10 | 56,676 | 2,278 | 32 | 58,986 | 29.49 | b,c,d |
| VOC | 13,027 | 0 | 20 | 13,047 | 6.52 | b,c,d |
| $SO_x$ | 2,122 | 0 | 1 | 2,123 | 1.06 | b,c,d |
| Ammonia | 66,576 | 0 | 0 | 66,576 | 3.29 | b,c,d |

Assumptions

a ~~t~~The gas turbines are undergoing one ~~warm~~cold startup per ~~month~~day (~~1.5~~2 hours), 22 hours/day of full load operation with the duct burner, ~~16 hours/day of full load operation without the duct burners and one shutdown per month (0.5 hours)~~ @ 65 deg F for 365 days per year.

b The gas turbines are undergoing 4 cold starts (2 hours), 52 warm starts (1.5 hours) 1314 hours of full load operation with the duct burner, 5782 hours of full load operation without the duct burner and 56 shutdowns (0.5 hours) per year.

c The cooling tower at full load for 8760 hours/day.

d The Firewater pump is being tested 199 hours/day.

**Verification:** The City of Vernon shall submit to the CPM for approval on a quarterly basis all emission records and calculations to demonstrate compliance with the emission limits stated herein as part of the quarterly emissions report.

SECTION 5

# Potential Effects on the Public

Consistent with the requirements of the CEC Siting Regulations Section 1769 (a)(1)(G), this section addresses the proposed Amendment's effects on the public.

The proposed amendment is not expected to have impacts that are greater than those analyzed during project licensing. Therefore, impacts to the public are expected to be the same as those analyzed during CEC license proceeding for the MGS.

SECTION 6

# List of Property Owners

Consistent with the CEC Siting Regulations Section 1769(a)(1)(H), this section lists the property owners affected by the proposed modifications. The list of property owners are presented in Appendix A.

SECTION 7

# Potential Effects on Property Owners

Consistent with the CEC Siting Regulations Section 1769(a)(1)(I), this section addresses potential effects of the proposed Amendment on nearby property owners, the public, and parties in the application proceeding.

The proposed project change is expected to result in comparable impacts as those analyzed during the licensing proceeding. Therefore, impacts to property owners are expected to be the same as those analyzed during the license proceeding for the project.

APPENDIX A

# List of Property Owners within 1,000 Feet of the Project Site

| | PARCEL | OWNERFIRST | OWNERLAST | MAILNUMBER | MAILSTREET | MAILCITY | MAILSTATE | MAILZIP |
|---|---|---|---|---|---|---|---|---|
| 1 | 6308 002 900 | Vernon City | | 4305 | S Santa Fe Ave | Vernon | CA | 90058 |
| 2 | 6308 014 015 | Alauda Enterprises | | | Po Box 49051 | Los Angeles | CA | 90049 |
| 3 | 6308 021 014 | Leonis Investments Llc | | 300 | E Esplanade Dr #2100 | Oxnard | CA | 93036 |
| 4 | 6308 022 021 | 46th Street Investors | | 2140 | Rockwood Dr | Sacramento | CA | 95864 |
| 5 | 6308 022 002 | Mohammad | Hanifusman | 2800 | E 46th St | Vernon | CA | 90058 |
| 6 | 6308 022 003 | Leonis G & D Leonis | Malburg | 2833 | Leonis Blvd #111 | Vernon | CA | 90058 |
| 7 | 6308 022 004 | Leonis & Dominica | Malburg | 2833 | Leonis Blvd #111 | Vernon | CA | 90058 |
| 8 | 6308 022 005 | Seadmore Investment Co Ltd | | 721 | Santa Monica Blvd | Santa Monica | CA | 90401 |
| 9 | 6308 022 006 | Steve | Joo | 2809 | Leonis Blvd | Vernon | CA | 90058 |
| 10 | 6308 022 007 | S & K First Llc | | 17706 | Heron Ln | Canyon Country | CA | 91387 |
| 11 | 6308 022 009 | Vernon Developers | | 1201 | S Olive St | Los Angeles | CA | 90015 |
| 12 | 6308 022 800 | Casino Realty Inc | | 924 | Chapala St | Santa Barbara | CA | 93101 |
| 13 | 6308 023 002 | Mz Investments Llc | | 2820 | Leonis Blvd | Vernon | CA | 90058 |
| 14 | 6308 023 003 | Malburg 2001 Trust | | 2833 | Leonis Blvd #111 | Vernon | CA | 90058 |
| 15 | 6308 023 004 | Fleischman Trust & Fleischman Art | Arthur | 2767 | Buller Creek Dr | Pasadena | CA | 91107 |
| 16 | 6308 023 005 | Samuel & Marie D | Glvertz | 5259 | Amalia Dr | Woodland Hills | CA | 91364 |
| 17 | 6308 023 006 | Richard Brewer Trust | | 73001 | Country Club Dr #a42 | Palm Desert | CA | 92260 |
| 18 | 6308 023 007 | Leonis & Dominica | Malburg | 2833 | Leonis Blvd | Vernon | CA | 90058 |
| 19 | 6308 023 008 | Gamm Enterprises L P | | 16902 | Coral Cay Ln | Huntington Park | CA | 90640 |
| 20 | 6308 025 009 | Joy Max Trading Inc | | 1120 1/2 | S Main St | Los Angeles | CA | 90015 |
| 21 | 6308 025 010 | Joy Max Trading Inc | | 1120 1/2 | S Main St | Los Angeles | CA | 90015 |
| 22 | 6308 025 011 | Leonis & Dominica | Malburg | 2833 | Leonis Blvd | Vernon | CA | 90058 |
| 23 | 6308 024 006 | Randall Foods Inc | | | Po Box 2999 | Huntington Park | CA | 90255 |
| 24 | 6308 024 009 | Nakase Family L P | | 545 | N Pennsylvania Ave | Glendora | CA | 91741 |
| 25 | 6308 024 010 | Randall Foods Inc | | | Po Box 2999 | Huntington Park | CA | 90255 |
| 26 | 6308 024 011 | Randall Foods Inc | | | Po Box 2999 | Huntington Park | CA | 90255 |
| 27 | 6308 024 012 | Nakase Family L P | | 545 | N Pennsylvania Ave | Glendora | CA | 91741 |
| 28 | 6308 024 016 | Nadrom Assoc | | 2828 | Leonis Blvd | Vernon | CA | 90058 |
| 29 | 6308 024 017 | Joseph & Jill | Poliner | 336 | 9th St | Manhattan Beach | CA | 90266 |
| 30 | 6308 024 018 | L Farrell Trust & Farrell Willa | William | 2808 | Leonis Blvd | Los Angeles | CA | 90058 |
| 31 | 6308 029 015 | The City Of Vernon | | 4305 | S Santa Fe Ave | Vernon | CA | 90058 |
| 32 | 6308 029 016 | Owens Brockway Glass Container Inc | | 1 | Seagate | Toledo | OH | 43666 |
| 33 | 6308 029 017 | Owens Brockway Glass Container Inc | | 1 | Seagate | Toledo | OH | 43666 |
| 34 | 6308 029 900 | Vernon City | | 4305 | S Santa Fe Ave | Vernon | CA | 90058 |
| 35 | 6308 001 022 | George | Van Fossan | 80 | Plaza Cuesta | San Juan Capistrano | CA | 92675 |
| 36 | 6308 001 023 | Lee | Bareb | 4535 | S Soto St | Vernon | CA | 90058 |
| 37 | 6308 001 024 | Bressman Family | | 2727 | E 46th St | Vernon | CA | 90058 |
| 38 | 6308 001 054 | Hun Ye | Kao | 385 | S Lemon Ave #e158 | Walnut | CA | 91789 |
| 39 | 6308 002 006 | 2761 Fruitland Avenue Llc | | 2761 | Fruitland Ave | Vernon | CA | 90058 |
| 40 | 6308 002 007 | 2761 Fruitland Avenue Llc | | 2761 | Fruitland Ave | Vernon | CA | 90058 |
| 41 | 6308 002 009 | Ramin & Betty | Yousbian | 4825 | S Soto St | Vernon | CA | 90058 |
| 42 | 6308 002 010 | Oliver E | Clark | 2716 | Leonis Blvd | Vernon | CA | 90058 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 43 | 6308 002 011 | Oliver E | Clark | 2716 | Leonis Blvd | Los Angeles | CA | 90058 |
| 44 | 6308 002 012 | Stanley & Jennifer | Kim | 345 | Corona Dr | La Canada | CA | 91011 |
| 45 | 6308 002 013 | OE Clark Paper Box Co | | 2716 | Leonis Blvd | Vernon | CA | 90058 |
| 46 | 6308 002 014 | Anne | Scott | 10104 | Empyrean Way #204 | Los Angeles | CA | 90067 |
| 47 | 6308 002 015 | Anne | Scott | 10104 | Empyrean Way #204 | Los Angeles | CA | 90067 |
| 48 | 6308 002 016 | Clark | Oliver | 2716 | Leonis Blvd | Vernon | CA | 90058 |
| 49 | 6308 002 017 | Clark | Oliver | 2716 | Leonis Blvd | Vernon | CA | 90058 |
| 50 | 6308 003 018 | Pasha & Associates Llc | | 14622 | Ventura Blvd #763 | Sherman Oaks | CA | 91403 |
| 51 | 6308 002 019 | Mardochee & Lubov | Azria | 2761 | Fruitland Ave | Vernon | CA | 90058 |
| 52 | 6308 002 020 | Mardochee & Lubov | Azria | 2761 | Fruitland Ave | Vernon | CA | 90058 |
| 53 | 6308 002 902 | Vernon City | | 4305 | S Santa Fe Ave | Vernon | CA | 90058 |
| 54 | 6308 003 008 | First Streamline Management Llc | | 2670 | Leonis Blvd | Vernon | CA | 90058 |
| 55 | 6308 003 010 | First Streamline Management Llc | | 2670 | Leonis Blvd | Vernon | CA | 90058 |
| 56 | 6308 003 012 | Angelus Sanitary Can Machine Co | | 4900 | Pacific Blvd | Vernon | CA | 90058 |
| 57 | 6308 003 014 | Mol Investment Group Inc | | 2615 | Fruitland Ave | Vernon | CA | 90058 |
| 58 | 6308 003 019 | Ed | Elsner | 4900 | Pacific Blvd | Vernon | CA | 90058 |
| 59 | 6308 003 020 | Elsner Ed Tr R & E Family Trust | | 1708 | Milan Ave | South Pasadena | CA | 91030 |
| 60 | 6308 003 021 | Angelus Sanitary Can Machine Co | | 4900 | Pacific Blvd | Vernon | CA | 90058 |
| 61 | 6308 003 022 | Angelus Sanitary Can Machine Co | | 4900 | Pacific Blvd | Los Angeles | CA | 90058 |
| 62 | 6308 003 023 | Stephane | Vachon | 5060 | Pacific Blvd | Vernon | CA | 90058 |
| 63 | 6308 003 024 | Mol Investment Group Inc | | 2615 | Fruitland Ave | Vernon | CA | 90058 |
| 64 | 6308 003 907 | At & Sf Ry Co Sb Of E Par 59 Map 804-19- | | 4901 | Seville Ave | Los Angeles | CA | 90058 |
| 65 | 6308 004 006 | Victor Bruno / Lee & Patricia | New | 2639 | Leonis Blvd | Vernon | CA | 90058 |
| 66 | 6308 004 007 | Victor Bruno / Lee & Patricia | New | 2639 | Leonis Blvd | Vernon | CA | 90058 |
| 67 | 6308 004 008 | Victor | Bruno | 2639 | Leonis Blvd | Los Angeles | CA | 90058 |
| 68 | 6308 004 009 | Suresh K & Anita | Nandwani | 4632 | Pacific Blvd | Vernon | CA | 90058 |
| 69 | 6308 004 010 | Young S | Chang | 343 | Pioneer Dr #1505 | Glendale | CA | 91203 |
| 70 | 6308 004 011 | Jeremy J & Noble Donna | Jones | 10412 | Gasparilla Rd | Santa Ana | CA | 92705 |
| 71 | 6308 004 012 | Jose L & Lidia O | Guerra | 8006 | Danvers St | Downey | CA | 90240 |
| 72 | 6308 004 013 | 2665 Leonis Boulevard Llc | | 2761 | Fruitland Ave | Vernon | CA | 90058 |
| 73 | 6308 005 007 | Flamen Family L P | | 4800 | Pacific Blvd | Vernon | CA | 90058 |
| 74 | 6308 005 008 | Lee Hollander Trust | Lee | 6580 | W Rogers Cir #19 | Boca Raton | FL | 33487 |
| 75 | 6308 009 024 | George W | Elitman | 2625 | Canterbury Rd | San Marino | CA | 91108 |
| 76 | 6308 009 026 | Marilyn S | Erlich | 2413 | Century Hl | Los Angeles | CA | 90067 |
| 77 | 6308 009 027 | Shlomo | Khoresh | 4841 | Pacific Blvd | Vernon | CA | 90058 |
| 78 | 6308 009 028 | Seymour & Shirley | Lehrer | 976 | Knollwood Dr | Santa Barbara | CA | 93108 |
| 79 | 6308 009 029 | Chandler Stephen Co | | 1592 | Virginia Rd | San Marino | CA | 91108 |
| 80 | 6308 010 018 | Fe & J Inc | | 5075 | Pacific Blvd | Vernon | CA | 90058 |
| 81 | 6308 010 017 | Fe & J Inc | | 5075 | Pacific Blvd | Vernon | CA | 90058 |
| 82 | 6308 010 016 | Fe & J Inc | | 5075 | Pacific Blvd | Vernon | CA | 90058 |
| 83 | 6308 010 019 | Nor Center Llc | | 2189 | Haven Dr | Glendale | CA | 91208 |
| 84 | 6308 010 020 | Ruy A | Gomez | 319 | W 47th St | Los Angeles | CA | 90037 |
| 85 | 6308 010 021 | Huss Investment Group Llc | | 424 | S San Pedro St | Los Angeles | CA | 90013 |

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|---|---|---|---|---|---|---|---|---|---|
| 86 | 6308 010 022 | Henry H | Gilmore | | Po Box 58041 | Vernon | CA | 90058 |
| 87 | 6308 010 023 | Pi Yu & Shren C | Lin & Ou | 4903 | Pacific Blvd | Vernon | CA | 90058 |
| 88 | 6309 018 003 | 5140 Pacific Blvd Llc | | 16109 | Dickens St | Encino | CA | 91436 |
| 89 | 6309 018 004 | Geneva M | Eiurd | 40177 | Corte Peralta | Murrieta | CA | 92562 |
| 90 | 6309 018 006 | Geneva M | Eiurd | 40177 | Corte Peralta | Murrieta | CA | 92562 |
| 91 | 6309 018 006 | Kokis Enterprises Llc | | 1036 | S Ynez Ave | Monterey Park | CA | 91754 |
| 92 | 6309 018 007 | Kokis Enterprises Llc | | 1036 | S Ynez Ave | Monterey Park | CA | 91754 |
| 93 | 6309 018 009 | 5140 Pacific Blvd Llc | | 16109 | Dickens St | Encino | CA | 91436 |
| 94 | 6309 019 002 | Aircraft X Ray Laboratories Inc | | 5216 | Pacific Blvd | Huntington Park | CA | 90255 |
| 95 | 6309 026 012 | 51st Street Partnership | | 2700 | Fruitland Ave | Vernon | CA | 90058 |
| 96 | 6309 026 026 | David Um & Un No | Young | 2726 | Fruitland Ave | Vernon | CA | 90058 |
| 97 | 6309 026 033 | Soto Industrial Center | | 5857 | E Washington Blvd | Los Angeles | CA | 90040 |
| 98 | 6309 026 034 | Soto Industrial Center | | 5857 | E Washington Blvd | Los Angeles | CA | 90040 |
| 99 | 6309 026 035 | David Um & Un No | Young | 2726 | Fruitland Ave | Vernon | CA | 90058 |
| 100 | 6309 026 036 | 51st Street Partnership | | 2700 | Fruitland Ave | Vernon | CA | 90058 |
| 101 | 6310 009 014 | Owens Illinois Glass Container Inc | | 1 | Seegate #50sg | Toledo | OH | 43666 |
| 102 | 6310 009 015 | Owens Illinois Glass Container Inc | | 1 | Seegate #50sg | Toledo | OH | 43666 |