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March 11, 2019

Mr. Joe Douglas
 California Energy Commission
 1516 Ninth Street (MS-2000)
 Sacramento, CA 95814

**Subject: Compliance -7 Annual Report for 2018
Orange Grove Project (08-AFC-4C)**

Dear Mr. Douglas:

In accordance with Condition of Certification COMPLIANCE-7, enclosed is the 2018 Annual Compliance Report for the Orange Grove Energy facility (Docket No. 08-AFC-4C) located in Pala, CA. Condition COMPLIANCE-7 requires, in part, that this transmittal letter identify documents that must be submitted along with the Annual Compliance Report pursuant to specific permit conditions. Accordingly, the following table outlines this information.

CONDITION	REQUIRED DOCUMENTS	LOCATION IN THE ANNUAL REPORT
BIO-2	Designated Biologist record summaries	Appendix A, Exhibit BIO-2
BIO-11	Designated Biologist Perry's Tetracoccus monitoring record summaries	Appendix A, Exhibit BIO-2
HAZ-1	List of Hazardous Materials	Appendix A, Exhibit HAZ-1
HAZ-8	Statements regarding background investigations and security plan recordkeeping	Appendix A, Compliance Matrix
SOIL & WATER-3	Information on DESCP monitoring and maintenance	Appendix A, Compliance Matrix
SOIL & WATER-3	Updates on compliance with County Watershed Ordinance	Appendix A, Compliance Matrix
SOIL & WATER-10	Annual water use summary	Appendix A, Exhibit SOIL & WATER-10
SOIL & WATER-11	Status of onsite septic system compliance	Appendix A, Compliance Matrix

CONDITION	REQUIRED DOCUMENTS	LOCATION IN THE ANNUAL REPORT
SOIL & WATER-12	Wastewater summary report	Appendix A, Exhibit SOIL & WATER-12
SOIL & WATER-13	Report on facility water conservation measures	Appendix A, Compliance Matrix
VIS-1	Status of maintenance on exterior surface treatments	Appendix A, Compliance Matrix
VIS-2	Report of landscape maintenance activities	Appendix A, Compliance Matrix
WASTE-7	Waste volumes generated	Appendix A, Exhibit WASTE-7
COMPLIANCE-5	Compliance matrix	Appendix A, Compliance Matrix
COMPLIANCE-12	Statement that closure contingency plan is maintained onsite and has been reviewed and recommended changes, if any.	Appendix A, Compliance Matrix

Should you have any questions regarding this submittal, please contact me at (760) 615-2026 or via email at rgarcia@orangegroveenergy.com.

Sincerely,



Ramiro Garcia
Compliance Manager
Orange Grove Energy, L.P.

Enclosure

cc: John Hutson
File: 300.6.3.1



2018 Annual Compliance Report

**Orange Grove Energy Project
San Diego County, California
(CEC Docket No. 08-AFC-4C)**

March 11, 2019

Submitted to:

Compliance Project Manager
(Docket No. 08-AFC-4C)
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814

Submitted by:

Orange Grove Energy, L.P.
35435 Pala Del Norte Rd
Pala, CA 92059

A handwritten signature in blue ink, appearing to read "R Garcia", is written above a horizontal line.

Signature

Ramiro Garcia

Name

Compliance Manager

Title

1.0 INTRODUCTION

An Annual Compliance Report is required by Condition COMPLIANCE-7 in the California Energy Commission's (CEC) Final Commission Decision for the Orange Grove Project. This report has been prepared to satisfy Condition COMPLIANCE-7 for the 2018 calendar year. The following sections of this report directly respond to the information requirements of Condition COMPLIANCE-7.

2.0 COMPLIANCE MATRIX

Appendix A provides a detailed compliance matrix showing the status of each condition from the CEC's Final Commission Decision that was not already fully satisfied prior to the reporting period.

3.0 PROJECT STATUS

The Orange Grove Power Plant was operational during the reporting period, functioning as a peaking plant. There were no significant changes to facility operations during the reporting period.

4.0 DOCUMENTS REQUIRED BY SPECIFIC CONDITIONS

The compliance matrix in Appendix A identifies each item required to be submitted along with the Annual Compliance Report and those items are included as Exhibits to the matrix. Pursuant to Condition COMPLIANCE-7, the transmittal letter to this report also identifies those items and the related Conditions.

5.0 CUMULATIVE LISTING OF POST-CERTIFICATION CHANGES

Condition COMPLIANCE-7 requires that the Annual Compliance Report identify all post-certification changes approved by the CEC or cleared by the Compliance Project Manager (CPM). Approval for the SCR COC Project and the Landscaping Plan for visual screening changes were approved during the 2016 reporting year. To date, six changes relevant to operations have been approved by the CEC or cleared by the CPM via the Chief Building Officer (CBO):

- On May 10 and 11, 2011, CEC visual resource staff performed their post-construction inspection. They confirmed completion of construction phase visual impact mitigation measures with the exception of planting of screening shrubbery near Highway 76 where staff agreed that planting should be postponed due to San Diego Gas & Electric Company (SDG&E) plans for development of a solar facility. The postponement of planting adjacent to the highway has been reported in each previous Annual Report to CEC.
- On March 14, 2012, Commission Order No. 12-0314-1m approved an amendment to the Orange Grove Project that modified the air quality conditions of certification to be consistent with the Permits to Operate issued by the San Diego County Air Pollution Control District (SDAPCD).

- On May 30, 2013, the CEC's CBO, via e-mail to Mr. Joseph Stenger from TRC, approved changes to the Orange Grove Power Plant including an air conditioning system, a temporary office trailer, and minor modifications to electrical outlets.
- Conforming to Construction drawings were submitted to the CBO and CPM on January 7, 2014 (See Compliance Log Nos. 2013-03 and 2014-01).
- A request to modify the Verification for Condition of Certification VIS-2 was submitted on April 4, 2014 (Compliance Log No. 2014-05). Appendix A provided further details in comments regarding Condition of Certification VIS-2.
- A petition for post-certification amendment was submitted to the CEC in May 2014 that was subsequently withdrawn.
- SDG&E obtained the necessary permits in 2015 for the planned solar power development. SDG&E has been working with the County to finalize a landscaping plan for visual screening. SDG&E submitted the landscaping Plan in Exhibit VIS-2 to the County in late 2015 and was approved on 4/11/16. Current progress is consistent with the Verification schedule delay requested in Compliance Log No. 2014-05.
- On April 12, 2016, Orange Grove Energy, L.P. filed a petition with the California Energy Commission (Energy Commission) requesting to conduct repair and maintenance work on the emission control systems at the OGEPP, which would include replacement in kind of components, but with upgrades to improve reliability and efficiency.
- On May 5, 2016, the District issued an Authority to Construct for the proposed repair and maintenance work. The District added two new conditions to ensure compliance with the permitted emission limits. The District also made some administrative changes to other conditions. In addition, CEC staff found some inconsistencies between the Energy Commission approved conditions of certification and the District approved conditions. CEC Staff revised the conditions of certification to provide consistency with the current District requirements.
- On June 21, 2016, submitted copy of the landscaping plan for the Solar Project which was approved by San Diego County on April 11, 2016. OGE requested that the Solar Project Landscaping Plan be accepted in lieu of the postponed planting of screening vegetation described in the April 4, 2014 (OGP Compliance Log # 2014-05). The solar project is currently under construction.
- On July 18, 2016 the California Energy Commission adopted the Staff's recommendations and approved the amended conditions of certification to the Commission Decision for the OGEPP.

6.0 MISSED SUBMITTAL DEADLINES

Orange Grove Energy, L.P. (OGE) operated during the reporting period in compliance with the Conditions of Certification. With this filing, there are no outstanding items past their due dates.

7.0 FILINGS TO AND PERMITS BY OTHER AGENCIES

Appendix B summarizes key environmental filings and permits issued in 2018. The SDAPCD issued the annual renewal of Permits to Operate for the Fire Water Pump and Black Start Generator. The SDAPCD issued extensions to the startup authorization for Units 1 and 2. San Diego County (CUPA) issued the annual renewal of the Unified Program Facility Permit. OGE filed application for recertification of the CEMS for Unit 1 (CTG1) and Unit 2 (CTG2).

OGE revised the Hazardous Materials Business Plan in November 2018 and the revised plan was uploaded onto the California Environmental Reporting System (CERS) where it will be maintained in accordance with State requirements.

In addition to the key filings identified in Appendix B, OGE completed numerous filings to Federal Energy Regulatory Commission, North American Electric Reliability Corporation, Western Electric Coordinating Council and other agencies in the ordinary course of business. OGE will be responsive to inquiries from CEC staff if there are specific questions on such filings.

8.0 COMPLIANCE SCHEDULE FOR THE UPCOMING YEAR

Compliance activities for the upcoming year include:

- Ongoing operations, maintenance, and reporting compliance requirements are integrated into OGE's environmental management procedures and will continue to be implemented during 2019.

9.0 ADDITIONS TO PROJECT COMPLIANCE FILES

Appendix C provides a list of items added to the compliance files during the 2018 reporting year.

10.0 ONSITE CONTINGENCY PLAN

OGE maintains a copy of the approved unplanned closure contingency plan onsite. OGE has reviewed the contingency plan for this Annual Compliance Report and no changes are recommended. In addition, OGE maintained insurance and major equipment warranties as required during the reporting period.

11.0 COMPLAINTS, NOTICES AND WARNINGS

No complaints, notices of violation, warnings or citations were received during the reporting year.

Appendix A

2018 Annual Compliance Matrix

Appendix A
Orange Grove Energy
2018 Annual Compliance Matrix

Condition Number	Description of Required Action or Submittal	Date Submittal Required	Actual or Expected Submittal Date	Date Approved by CBO/CPM/ or delegate agency	Compliance Status	Log Number	Comments	Exhibit(s)
AQ-SC7	The project owner shall submit any proposed air permit modification to the CPM within five working days of its submittal either by 1) the project owner to an agency, or 2) receipt of proposed modifications from an agency.	Within 5 working days of submittal/ receipt.	N/A	NA	NA	NA	No modifications to air permits were proposed by the owner during the reporting period, and no proposed modifications were received from any agency.	
	The project owner shall submit all modified air permits to the CPM within 15 days of receipt.	Within 15 days after modified permit is received.	N/A	N/A	N/A	N/A	SDAPCD issued extension to startup authorization (APCD2016-APP-004406) to OGE. Copies provided to the CEC.	
AQ-SC8	The project owner shall submit truck maintenance records for the year in the fourth quarter Quarterly Operation Reports (AQ-SC11) that demonstrate the water trucks are properly maintained and the engines are tuned in accordance with manufactures specifications.	1/30/19	1/28/19	NA	Submitted	2019-5	Submitted in the fourth quarter operations report.	
AQ-SC10	The project owner shall test the cooling water for TDS at least once annually during the anticipated summer operation peak period (July-Sept) and shall provide the water quality test results and the chiller cooling tower emissions estimates to the CPM as part of the fourth quarter's quarterly operational report (AQ-SC11).	1/30/19	1/28/19	NA	Submitted	2019-5	Submitted in the fourth quarter operations report.	
AQ-SC11	The project owner shall submit Quarterly Operation Reports to the CPM and to the San Diego Air Pollution Control District (District), if requested, no later than 30 days following the end of each calendar quarter. The report shall include operations and	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data was submitted with quarterly reports.	
AQ-1	The project owner shall properly maintain equipment in good operating condition at all times and make the site available for inspection by representatives of the District, California Air Resources Board (ARB), and the Energy Commission.	NA	NA	NA	NA	NA	OGE maintains all emission control equipment in good working order, and provides agency staff access for inspections.	
AQ-2	The project owner shall operate the project in accordance with data and specifications submitted in the application and shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE operates the project in accordance with data and specifications in the application, and provides agency staff access for inspection of records.	
AQ-3, AQ-BSE1, AQ-FP1	The project owner shall provide facilities, utilities, and safety equipment for source testing and inspections upon request of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE will provide such access, facilities, utilities, and safety equipment if requested, except for personal safety equipment requiring individual fitting or specialized training.	
AQ-4	If any new or replacement ancillary emission sources are installed during operations, the project owner shall obtain any necessary Air District permit before the equipment is delivered to the site.	NA	NA	NA	NA	NA	No new or replacement ancillary emission sources were installed during 2018.	
AQ-6	The units shall be fired on Public Utility Commission (PUC) quality Natural gas only. The project owner shall maintain, on site, quarterly records of sulfur content (grains of sulfur compounds per /100 dscf of Natural gas) and the higher and lower heating values (Btu/scf) of the Natural gas; and provide such records to District personnel upon request.	NA	NA	NA	NA	NA	Required records are maintained and available to the District if requested.	
	The project owner shall maintain onsite quarterly records of the Natural gas sulfur content (grains S compounds/100 dscf) and the higher and lower heating values (Btu/scf) and shall submit the quarterly fuel sulfur content values in the in the Quarterly Operation Reports (AQ-SC11) and make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Analysis of natural gas sulfur content were performed during each quarter of the year and submitted with each Quarterly Operation Report.	
AQ-8	The total combined Unit Operating Hours (defined in 40 CFR 72.2) for the turbines shall not exceed 6,400 hours per calendar year, and the project owner shall submit to the CPM and District the CTG annual operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC11).	1/30/19	1/28/19	NA	Submitted	2019-5	The OGE turbines operated a total of 1,165 hours in calendar year 2018. Operating data were submitted with quarterly reports to the CPM, and "Rule 19" reports to the SDAPCD. The "Rule 19" reports are provided as Exhibit B of the quarterly reports.	

Appendix A
Orange Grove Energy
2018 Annual Compliance Matrix

Condition Number	Description of Required Action or Submittal	Date Submittal Required	Actual or Expected Submittal Date	Date Approved by CBO/CPM/ or delegate agency	Compliance Status	Log Number	Comments	Exhibit(s)
AQ-10	For purposes of determining compliance with the CEMS, data collected in accordance with the approved CEMS operating protocol shall be used.	NA	NA	NA	NA	NA	OGE adhered to this requirement for the reporting period.	
	For purposes of determining compliance based on source testing, the average of three subtests shall be used.	NA	NA	NA	NA	NA	OGE adhered to this requirement for the reporting period.	
	The Verification for this Condition is based on the project owner providing the annual source test data in the Quarterly Operations Report (AQ-SC-11) following each source test.	7/30/2018	6/29/18	NA	Submitted	E-mail	The Annual Source and RATA Testing Report for testing conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	
AQ-11	For the purposes of this license, startup conditions shall be defined as the period of time that begins when fuel flows to the turbine begins and shall continue for no longer than 30 consecutive minutes. Shutdown conditions shall be defined as the 15 minute period preceding the moment at which fuel flow ceases.	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data submitted to CPM with Quarterly Operations Reports.	
	The project owner shall submit to the CPM the CTG start-up and shutdown event duration data from the DAS demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11).							
AQ-12	For emission limits expressed in lbs/hr or ppm based on a clock-hour averaging period, compliance shall be based on continuous emissions data collected at least once every 15 minutes. Verification is based on CEMS data summaries being submitted to the CPM as part of the Quarterly Operation Reports (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	CEMS data, expressed as lb/hr and ppm, were included in the Quarterly Operations Reports submitted to the CPM.	
AQ-13	During startup, the emissions from each turbine shall not exceed:	4/30/18 7/30/18 10/30/18 1/30/19		NA	Submitted	2018-10 2018-17 2018-20 2019-5	Compliance was monitored by the CEMS as required and annual source testing was conducted with results provided to the CPM. NOx emissions were below the emission limit except for periods as previously reported in Quarterly Operations Reports.	
	The project owner shall submit to the CPM the CTG operating data demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11).		4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5		
AQ-14	Emissions of nitrogen oxides from each unit exhaust stack shall not exceed 25 parts per million by volume, dry basis (ppmv) at 15 percent O2 or 150 ng/J of useful output (1.2 lb/MWh) (4 hour average pursuant to 40 CFR §60.4380(b)). This limit applies at all times including periods of startup and shutdown. Submit to the CPM demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQSC11).	7/30/18 1/30/19	7/24/18 1/28/19	NA	Submitted	2018-17 2019-5	Submitted semiannually in the Quarterly Operation Report.	
AQ-15	Excess emissions shall be as defined in 40 CFR Subpart KKKK §60.4380. An excess emission is any unit operating period, including periods of startup and shutdown, in which the 4-hour or 30-day rolling average NOx emission rate exceeds the applicable emission limit in 40 CFR 60 Subpart KKKK, Appendix Table 1. The project owner shall demonstrate compliance with this condition as part of the excess emissions reports (AQ-16).	7/30/18 1/30/19	7/24/18 1/28/19	NA	Submitted	2018-17 2019-5	Submitted semiannually in the Quarterly Operation Report.	
AQ-16	The project owner shall submit to the CPM demonstrating compliance with this condition. Reports submitted pursuant to this requirement shall be postmarked no later than the 30th day following the end of the 6-month reporting period.	7/30/18 1/30/19	7/24/18 1/28/19	NA	Submitted	2018-17 2019-5	Submitted in the Quarterly Operation Report.	
AQ-17	During shutdown, the emissions from each turbine shall not exceed: NOx - 2.68 lbs/event CO - 4.43 lbs/event VOC - 0.73 lbs/event The project owner shall submit to the CPM the CTG operating data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Compliance was monitored by the CEMS as required and annual source testing was conducted with results provided to the CPM. NOx emissions were below the emission limit except for periods as previously reported in Quarterly Operation Reports.	

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Condition Number	Description of Required Action or Submittal	Date Submittal Required	Actual or Expected Submittal Date	Date Approved by CBO/CPM/ or delegate agency	Compliance Status	Log Number	Comments	Exhibit(s)
AQ-18	NOx calculated as NO2 shall not exceed 2.5 ppm averaged over a clock hour period, except for startup and shutdown. Compliance shall be demonstrated continuously based on CEMS data and source test data averaging three substests. The project owner shall provide the source test data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11), due in the quarter after the source test report is completed.	7/30/2018	6/29/18	NA	Submitted	E-mail	Compliance was monitored by the CEMS as required and annual source testing was conducted with results provided to the CPM. NOx emissions were below the emission limit except for periods as previously reported in Quarterly Operation Reports. The Annual Source and RATA Testing was conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	
	The project owner shall provide emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data, including NOx emissions, were included in the Quarterly Operations Reports submitted to the CPM.	
AQ-19	CO from the stacks shall not exceed 6 ppm except for startup and shutdown. Compliance shall be demonstrated continuously via CEMS and using source test data.	7/30/2018	6/29/18	NA	Submitted	E-mail	OGEC operated in compliance with this limit. Compliance was monitored by the CEMS as required and annual source testing was conducted with the results provide to the CPM. The Annual Source and RATA Testing was conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	
	The project owner shall provide emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data, including CO emissions, were included in the Quarterly Operations Reports submitted to the CPM.	
AQ-20	VOC measured in the stacks, calculated as methane, shall not exceed 2.0 ppmvd except for startup and shutdown. Compliance shall be demonstrated by source testing based on a District-approved CO/VOC surrogate relationship.	NA	NA	NA	NA	NA	OGEC operated in compliance with this limit. Compliance was monitored by the CEMS as required and annual source testing was conducted with the results provide to the CPM .	
	The project owner shall provide the source test data to demonstrate compliance with this condition as part of the Quarterly Operation Report (AQ-SC11), due in the quarter after the source test report is completed.	7/30/2018	6/29/18	NA	Submitted	E-mail	Compliance was monitored by the CEMS as required and annual source testing was conducted with results provided to the CPM. VOC emissions were below the emission limit . The Annual Source and RATA Testing was conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	
AQ-23	Emissions from the turbines shall not exceed the following as determined by CEMS and emissions testing: NOx calculated as NO2 8.6 tons/year; CO 11.3 tons/year; VOC 2.3 tons/year.	1/30/19	1/28/19	NA	Submitted	2019-5	OGEC complied with these limits during the reporting period. Operating data, including NOx, CO, and VOC emissions, were included in the fourth quarter operations report submitted to the CPM.	
	The project owner shall submit to the CPM the CTG operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC11).							
AQ-24	Emissions of PM-10 shall not exceed 3.0 lbs/hour. Compliance shall be determined by initial source testing.	NA	NA	NA	NA	NA	PM-10 source testing was performed as part of the initial commissioning. SDAPCD has not requested follow up testing.	
	The project owner shall provide the source test data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11), due in the quarter after the source test report is completed.							
AQ-25	Discharge of particulate matter from the stacks shall not exceed 0.10 grains per dry standard cubic foot. The district may require periodic source testing to verify compliance.	NA	NA	NA	NA	NA	Source testing was performed as part of the initial commissioning. SDAPCD has not requested follow up testing.	
	The project owner shall provide the source test data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11), due in the quarter after the source test report is completed.							

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Orange Grove Energy
2018 Annual Compliance Matrix

Condition Number	Description of Required Action or Submittal	Date Submittal Required	Actual or Expected Submittal Date	Date Approved by CBO/CPM/ or delegate agency	Compliance Status	Log Number	Comments	Exhibit(s)
AQ-26	Except during startup and shutdown, ammonia emissions from the turbine shall not exceed 5 ppmvd. Compliance shall be demonstrated through source testing using specified procedures.	7/30/2018	6/29/18	NA	Submitted	E-mail	OGEC operated in compliance with this limit except for periods as previously reported in Quarterly Operation Reports. Compliance was monitored by the CEMS as required and annual source testing was conducted with the results provide to the CPM . The Annual Source and RATA Testing was conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	
	The Verification for this Condition is based on the project owner providing the estimated daily ammonia concentration and daily ammonia emissions based on the procedures given in the Condition and provide the annual source test data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11), where the source test data is due in the quarter after the source test report is completed.	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	N/A	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data was submitted with quarterly reports.	
AQ-27	Visible emissions from the lube oil vents and stacks shall not exceed 20 % opacity for more than three minutes in any period of 60 consecutive minutes. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE makes the site available for inspection.	
AQ-29	Total aggregate emissions from all stationary emission units [except as excluded via Rule 20.1(d)(1)] shall not exceed the following in any 12 calendar-month rolling period: NOx - 50 tons/year; CO - 100 tons/year; VOCs - 50 tons/year; SOx - 100 tons/year. PM10 - 100 tons/year	1/30/19	1/28/19	NA	Submitted	2018-4	OGEC operated in compliance with these limits. Operating data was submitted with the 4th quarter's report.	
	The project owner shall submit to the CPM and District the facility annual operating and emissions data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC11). Emissions of any single federal hazardous air pollutant shall not equal or exceed 10 tons, and the aggregate emission of all federal hazardous air pollutants shall not equal or exceed 25 tons in any rolling 12-calendar month period. Compliance shall be based on a methodology approved by the District. If these limits are exceeded, the project owner shall apply to amend the District permit. The project owner shall submit to the CPM and District the facility annual operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC11).	1/30/19	1/28/19	NA	Submitted	2017-10	OGEC operated in compliance with these limits. Operating data was submitted with the 4th quarter's report	
AQ-30	The CEMS shall be calibrated and maintained in accordance with the District-approved protocol and certified per 40 CFR 60 and 75. The CEMS shall be in full operation at all times when the turbines are in operation. The project owner shall submit to the CPM and District the SCR system operating data demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating and compliance data were submitted with quarterly reports to the CPM, and "Rule 19" reports to the SDAPCD. The "Rule 19" report are provided as Exhibit B of the quarterly reports. The CEMS were calibrated and maintained in accordance with District-approved protocol. CEMS Breakdowns were reported in Quarterly Operation Reports previously submitted to the CPM.	
AQ-31	Except during startup and shutdown, the water injection, SCR, and oxidation catalyst system shall be in full operation when the turbine is in operation. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conformed to these requirements.	

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Orange Grove Energy
2018 Annual Compliance Matrix

Condition Number	Description of Required Action or Submittal	Date Submittal Required	Actual or Expected Submittal Date	Date Approved by CBO/CPM/ or delegate agency	Compliance Status	Log Number	Comments	Exhibit(s)
AQ-32	Except when the system is being tuned or in manual control, the automatic ammonia injection system for the SCR shall be in operation in accordance with manufacturers' specifications at all times when ammonia is being injected into the SCR. Manufacturer's specifications shall be maintained onsite and made available to District personnel upon request. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
	In the event of a breakdown in the ammonia injection control system, a trained operator shall operate the system manually and the breakdown shall be reported to the District Compliance Division pursuant to Rule 98(b)(1) and 98(e).	NA	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	There were no breakdowns of the ammonia injection control system during this reporting period.	
	The project owner shall notify the District regarding any ammonia injection control system breakdown as required in this condition and shall document all such communications in each Quarterly Operation Report (AQ-SC11).							
AQ-34	The concentration of ammonia shall be less than 20 percent by weight. The project owner shall maintain on site and provide on request of the CPM or District the ammonia delivery records that demonstrate compliance with this condition.	NA	NA	NA	NA	NA	All ammonia used during the 2018 calendar year was less than 20 percent concentration by weight. OGE maintains ammonia delivery records on site documenting compliance and will provide such records upon request.	
AQ-11	For the purposes of this license, startup conditions shall be defined as the period of time that begins when fuel flows to the turbine begins and shall continue for no longer than 30 consecutive minutes. Shutdown conditions shall be defined as the 15 minute period preceding the moment at which fuel flow ceases.	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data was submitted to CPM with Quarterly Operations Reports.	
	The project owner shall submit to the CPM the CTG start-up and shutdown event duration data from the DAS demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC11).							
AQ-36	Each turbine shall be equipped with continuous monitors to measure or calculate, and record, the following operational characteristics of each unit: 1. Hours of operation (hours), 2. Natural gas flow rate (scfh), 3. Heat input rate (MMBtu/hr), 4. Exhaust gas temperature (F), 5. Power output (gross MW), 6. Water (for NOx control) injection rate (gal/hour) if equipped with water injection, 7. SCR inlet temperature (F), 8. Ammonia injection rate (lbs/hour).	NA	NA	NA	NA	NA	The turbines are equipped with the prescribed monitors.	
AQ-37, -43, -44, -47, -48, -49	The project owner shall comply with CEMS requirements of 40 CFR Parts 60 and 75, shall maintain a copy of the District-Approved CEMS protocol on site, and provide it for inspection on request of the CPM or District. The CEMS shall operate in accordance with the District approved monitoring protocol at all times when the turbine is in operation.	NA	NA	2/23/2010	Approved	NA	OGE complied with 40 CFR Part 60 and 75 CEMS requirements during 2018 and operated the CEMS in accordance with the District-Approved CEMS protocol. A copy of the CEMS protocol was maintained onsite and available for inspection during 2018.	
AQ-40	If source testing will be performed by an independent contractor and witnessed by the District, a source test protocol shall be submitted to the District for written approval and CEC for review at least 30 days prior to source testing.	At least 30 days prior to source test.	4/24/18	NA	Submitted	Email	Testing protocol submitted to SDAPCD on April 24, 2018.	
AQ-41	The project owner shall submit all relative accuracy test audit (RATA) or source test reports to the District for approval within 45 days of the completion of those tests.	Within 45 days of completion of source test or RATA.	6/29/18	NA	Submitted	Email	The Annual Source and RATA Testing was conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	

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	The Verification requires that these reports be submitted to the CPM for review with 45 days also.	Within 45 days of completion of source test or RATA.	6/29/18	NA	NA	2017-10	The Annual Source and RATA Testing was conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	
AQ-46	A Relative Accuracy Test Audit (RATA) and other required certification tests shall be performed and completed on the CEMs in accordance with 40 CFR Part 75 Appendix A Specifications and Test Procedures.	NA	NA	NA	NA	NA	Testing performed in accordance with 40 CFR Part 75 and testing protocol approved by the SDAPCD.	
	At least 30 days prior to the test date, the project owner shall submit a test protocol to the District for written approval and to the CPM for Review.	30 days prior to testing	4/24/18	NA	Submitted	Email	Testing protocol submitted to SDAPCD on April 24, 2018.	
	Additionally, the District shall be notified a minimum of 21 days prior to the test so that observers may be present.	21 days prior to testing	4/24/18	NA	Submitted	Email	Notification submitted more than 21 days in advance of the testing date.	
	Within 30 days of completion of this test, a written test report shall be submitted to the District for approval and to the CPM for review.	30 days after testing	6/29/18	NA	NA	NA	The Annual Source and RATA Testing was conducted on May 31, 2018 and June 1, 2018. Results were submitted to the CPM via e-mail on June 29, 2018.	
AQ-50	When the CEMS is not recording data and the turbine is operating, emissions shall be calculated in accordance with 40 CFR 75 Subpart C, and hourly CO emissions for annual emissions calculations shall be determined using a CO emission factors determined from source testing, recorded CEMS data, and fuel consumption data using methodologies reviewed and approved in writing by the District. Verification is based on the owner providing the District all emissions calculations required by this condition, and providing a notation of when such calculations are used in place of CEMS data as part of the Quarterly Operations Report (AQ-SC-11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	OGE complies with missing data procedures from the Acid Rain regulations in 40 CFR Part 75 using calculation procedures approved by the SDAPCD. Any Substitute data hours are noted in exhibits to the the quarterly reports.	

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AQ-51	Any violation of an emission standard indicated by the CEMS shall be reported to the District's compliance division within 96 hours after such occurrence.	Within 96 hours of CEMS recording a violation of emissions standards.	As needed	NA	NA	NA	Violations were reported as required.	
	Any violation of an emission standard indicated by the CEMS shall be documented in each Quarterly Operation Report (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Violations were reported as required.	
AQ-52	CEMS shall be maintained and operated in accordance with Rule 19.2 and the approved protocol. The project owner shall maintain records, submit Quarterly reports to the District, and comply with other requirements of Rule 19.2 Sections (d), (e) and (f)(1) through (f)(5).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data were submitted with quarterly "Rule 19" reports to the SDAPCD, which are provided as Exhibit B in the quarterly reports.	
	The owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE makes the site available for inspection.	
AQ-53	The operating log or data acquisition and handling system (DAHS) operating records will be provided as part of the Quarterly Operation Report (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data was submitted with quarterly reports	
	An Operating Log or DAHS shall be maintained to record specified data. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE maintains a DAHS to record specified data. OGE makes the site available for inspection.	
AQ-54	The District shall be notified in writing at least two weeks prior to any planned changes made to the CEMS software.	2 weeks before any changes	NA	NA	NA	NA	No changes to the CEMS software were made during this reporting period.	
AQ-55	Fuel flow meters with an accuracy of +/- 2% shall be maintained to measure the volumetric flow rate corrected for temp and pressure. Correction factors and constants shall be maintained onsite and made available to the District upon request. Flow meters shall conform to 40 CFR 75 Appendix D, and Section 2.1.6. The Verification is based on the project owner providing Natural gas usage data from the fuel flow meters as part of the Quarterly Operations Report (AQ-SC-11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	Operating data was submitted with quarterly reports	
AQ-56	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE will provide access for inspection of records as required.	
AQ-58. AQ-FP19	The project owner shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)	NA	NA	NA	NA	NA	OGE will provide access for inspection of records as required.	
	The project owner shall certify compliance with this condition as part of the fourth quarter's Quarterly Operation Report (AQ-SC11) and shall make the site and data available for inspection by representatives of the District, ARB, and the Energy Commission.	1/30/19	1/28/19	NA	Submitted	2018-4	OGE will provide access for inspection as required. Certification submitted with fourth quarter Operation Report.	

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AQ-59	The project owner shall submit to the CPM for review and the District for approval the source test, RATA, and applicable certification test protocol at least 30 days prior to the tests and shall submit to the CPM for review and the District for approval a copy of the written test report within 30 days after test completion.	30 days prior to testing	4/24/18	NA	Submitted	Email	Testing protocol submitted to SDAPCD on April 24, 2018.	
	The project owner shall also notify the CPM and District of the test date at least 21 days prior to conducting the RATA and other certification tests.	21 days prior to testing	4/24/18	NA	Submitted	Email	Testing protocol submitted to SDAPCD on April 24, 2018.	
AQ-60	Unless a later date is approved in writing by the District, not later than 30 calendar days prior to the start of the repair and maintenance project the project owner shall submit to the District the final selection of the catalyst manufacturers and design parameters and details of the selective catalytic reduction (SCR) and oxidation catalyst emission control systems for the combustion turbines.	30 days prior to start of project	N/A	NA	N/A	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
AQ-83	O&M logs required by permit for the emergency fire pump engine shall be kept for a minimum of three years unless otherwise indicated by the permit conditions, and shall be maintained onsite for a minimum of 24 months. Records for the last 24 months shall be made available to the District upon request and records for 25 to 36 months shall be made available within 5 working days of a request. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-84	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE provides site access for inspection of records by representatives of the District, ARB, and the Energy Commission.	
AQ-BSE2	This condition pertains to the black start engine which fires natural gas. Gaseous fuel engines shall use only gaseous fuel which contains no more than 10 grains of sulfur compounds per 100 scf. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	Analyses of natural gas sulfur content were performed during each quarter of the year. Required records are maintained and available if requested.	
AQ-BSE1, AQ-FP3	Visible emissions from the black start generator engine and emergency fire pump engine shall comply with Rule 50. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-BSE4, AQ-FP7	The emergency fire pump engine and black start generator engine shall not cause pollution or nuisance (Rule 51). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	

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AQ-BSE5, AQ-FP8	A non-resettable engine hour meter shall be maintained on the black start generator engine and the emergency fire pump engine and used to record operating hours. If the meter is replaced, the project owner shall provide notification to the District in writing within 10 calendar days including specified information, and shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	Within 10 calendar days of meter replacement.	NA	NA	NA	NA	OGE conforms to these requirements. No meter replacement has occurred.	
AQ-BSE6	Operation of the black start generator engine shall not exceed 0.5 hours per day and 52 hours per calendar year for non-emergency use. The Verification is based on the project owner submitting black-start engine operating data to the CPM as part of the Quarterly Operation Report.	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	The black start generator engine was operated within these limits. Operating data was submitted with quarterly reports	
AQ-BSE7, AQ-FP10	The project owner shall maintain the black start generator engine and emergency fire pump engine and any add-on control equipment, as applicable, as recommended by the engine and control equipment manufacturer or another maintenance procedure approved in writing by the District, and shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission. Periodic maintenance shall occur at least once per year.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-BSE8, AQ-FP11	The owner or operator shall change engine oil and filter every 500 hours of operation or annually, whichever comes first; or test the oil in accordance with 40 CFR § 63.6625(i). (40 CFR 63 Subpart ZZZZ) The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE complied with this requirement and maintains the records on site, and are available for inspection.	
AQ-BSE9, AQ-FP12	The owner or operator shall inspect the air cleaner of a compression ignition engine or inspect spark plugs of a spark ignition engine, every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63 Subpart ZZZZ) The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE complied with this requirement and maintains the records on site, and are available for inspection.	
AQ-BSE10, AQ-FP13	The owner or operator shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63 Subpart ZZZZ) The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE complied with this requirement and maintains the records on site, and are available for inspection.	
AQ-BSE11, AQ-FP14	Maintain applicable fuel certification records, manufacturers or other approved manual of recommended maintenance, and actual maintenance records for the black start generator engine. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-BSE12	The project owner shall maintain an operating log for the black start generator engine with dates and times of engine operation, indication of whether the operation was during an emergency situation and the Nature if the emergency, if available, total cumulative hours of operation per calendar year based on hour meter or fuel meter; and records of periodic maintenance including dates of maintenance, calibration or replacement of equipment. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	

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AQ-BSE13	O&M logs required by permit for the black start generator engine shall be kept for a minimum of three years unless otherwise indicated by the permit conditions, and shall be made available to the District upon request. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-BSE14	The owner or operator of the engine shall maintain the following records on site for at least the same period of time as the engine to which the records apply is located at the site: A. Documentation shall be maintained identifying the fuel as ARB diesel; B. Manual of recommended maintenance provided by the manufacturer, or maintenance procedures specified by the engine servicing company; and C. Records of annual engine maintenance, including the date the maintenance was performed. These records shall be made available to the Air Pollution Control District upon request. (Rule 69.4.1) (17 CCR 93115) The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE will maintain and have available for inspection the required records for the lifetime of the equipment.	
AQ-BSE15	The project owner shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.) The project owner shall certify compliance with this condition as part of the fourth quarter's Quarterly Operation Report (AQ-SC11) and shall make the site and data available for inspection by representatives of the District, ARB, and the Energy Commission.	1/30/2018	1/28/19	NA	Submitted	2018-4	OGE complied with the requirement and submitted certification in the fourth Quarterly Operation Report.	
AQ-FP2	The emergency fire pump engine shall burn only ARB diesel fuel. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-FP4	The engine and any associated air pollution control equipment and monitoring equipment shall be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions (40CFR Subpart ZZZZ §63.6605(b)). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-FP5	The owner or operator shall minimize engine operating time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. (40CFR Subpart ZZZZ §63.6625(h)) The project owner shall submit to the CPM the fire pump engine operating data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC11).	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-FP6	The emergency fire pump engine shall not run for maintenance or testing in excess of 0.5 hour per day and 50 hours per calendar year. Verification is based on the project owner submitting to the CPM the fire pump engine operating data as part of the Quarterly Operation Report (AQ-SC11).	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2018-10 2018-17 2018-20 2019-5	The fire pump engine was operated within these limits. Operating data was submitted with quarterly reports	

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AQ-FP15	The project owner shall maintain an operating log for the emergency fire pump engine with dates and times of engine operation, indication of whether the operation was during an emergency situation and the nature of the emergency, if available, and the nature and hours of operation for all other uses. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	NA	NA	NA	NA	NA	OGE conforms to these requirements.	
AQ-FP17	The project owner shall submit the Subpart ZZZZ semiannual compliance reports to the CPM and to the District by the end of the month following each reporting period.	7/30/18 1/30/19	7/24/18 1/28/19	NA	Submitted	2017-13 2018-2	OGE submitted the reports as required.	
BIO-2	A CPM-Approved Designated Biologist shall supervise or conduct mitigation, monitoring and other biological resource compliance efforts during project operations. The Designated Biologist shall submit record summaries in the Annual Compliance Report.	Annual Compliance Reports	This Submittal	N/A	Submitted in this Annual Report	2018-5	A biology annual summary report prepared by the Designated Biologist is provided in Exhibit BIO-2.	BIO-2
BIO-4	The project owner shall implement a CPM-approved Worker Environmental Awareness Program for operations, and signed statements that training has been received shall be maintained for active project operations personnel for the duration of their employment and for six (6) months after their termination.	NA	NA	NA	NA	NA	The CPM-approved WEAP continued to be implemented during the reporting year and records of training were maintained during the reporting year.	
BIO-11	During project operations, the Designated Biologist shall submit Perry's tetracoccus mitigation and monitoring record summaries in the Annual Compliance Report until the performance criteria in the mitigation plan have been achieved.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report	2018-5	Perry's Tetracoccus monitoring was conducted and is described in the attached Biologist summary report in Exhibit BIO-2.	BIO-2
HAZ-1	The project owner shall not use hazardous materials other than those identified in p. 232- p. 234 in the Final Commission Decision (FCD), or use such chemicals in strengths or quantities greater than those identified in the FCD, unless approved in advance by the CPM. Owner shall provide to the CPM, in the Annual Compliance Report, a list of hazardous materials contained at the facility.	Annual Compliance Report.	This Submittal	NA	Submitted in this Annual Report	2018-5	A copy of the OGE Hazardous Materials inventory is provided as Exhibit HAZ-1 and identifies each of the hazardous materials used or stored onsite in a reportable quantity.	HAZ-1
HAZ-3	The project owner shall implement the approved Safety Management Plan for delivery of aqueous ammonia and other liquid hazardous material to the facility via tanker truck.	NA	NA	May-15	NA	NA	An updated Safety Management Plan for aqueous ammonia deliveries was previously submitted to the CPM in May 2015 (refer to Compliance Log No. 2015-08). No comments, questions or request for additional information was received from the CEC. Ammonia is the only liquid hazardous material delivered to the site by tanker truck.	
HAZ-5	The project owner shall direct all vendors delivering aqueous ammonia to use only tanker truck transport vehicles which meet or exceed the specifications of DOT Code MC-307. A copy of the notification shall be provided for CPM approval at least 30 days prior to delivery.	30 days prior to delivery, as needed	As needed	NA	NA	NA	OGE directs aqueous ammonia vendors to conform to this requirement via standing contract terms and conditions that were in place for the reporting period. No new aqueous ammonia vendors were contracted in 2018.	
HAZ-6	The project owner shall direct all vendors delivering hazardous materials to use only I- 15 and SR-76 unless an alternate route is approved by the CPM. In addition, the project owner shall prohibit through contractual language the transportation of aqueous ammonia to the site that would coincide with school bus traffic on SR-76. A copy of the notification and contract language shall be provided for CPM approval at least 30 days prior to delivery.	30 days prior to delivery, as needed	As needed	NA	NA	NA	OGE directs aqueous ammonia vendors to conform to this requirement via standing contract terms and conditions that were in place for the reporting period. No new aqueous ammonia vendors were contracted in 2018.	
HAZ-8	The project owner shall implement the approved operations site security plan.	NA	NA	NA	NA	NA	OGE has implemented the operations security plan. The plan was originally noticed to CEC staff on 12/18/09 (Log No. 2009-181) and was updated in December 2013.	

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	In the annual compliance report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and that current hazardous material transport vendor's certification statements for security plans have been appended to the operations security plan.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report	2019-8	Background investigations have been performed for all individuals that were employed by OGE during the reporting period and hazardous material transport vendor certification statements are appended to the operations security plan. The CPM has not determined any contractors to require certification of background investigations.	
NOISE-2	Project owner shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints as specified in this condition. Within five days of receiving a noise complaint, the project owner shall file a Noise Complaint Resolution Form, with both the local jurisdiction and the CPM that documents the resolution of the complaint. If mitigation is required to resolve the complaint, and the complaint is not resolved within a three-day period, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is performed and complete.	Within 5 days of receiving a noise complaint.	This Submittal	NA	Submitted in this Annual Report	2019-8	There were no facility noise complaints during this compliance period.	
PUBLIC HEALTH-1	Project owner shall implement the approved Cooling Water Management Plan including sampling and testing for the presence of Legionella bacteria at least every six months. Project owner can request CPM to modify Legionella bacteria testing requirements following two years of operations.	NA	N/A	N/A	N/A	N/A	Testing for Legionella bacteria occurred on samples taken May 9 and October 29, 2018. Legionella was not detected in any of the samples.	
SOIL & WATER-3	The project owner shall implement, update and maintain the approved DESCOP during project operations and provide information on the results of monitoring and maintenance activities in the annual compliance report.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report	2019-8	No modifications to the project were made that would require updating of the DESCOP. The DESCOP does not include any required monitoring for operations. Soil stabilization measures and storm water control infrastructure are periodically inspected to ensure integrity. Maintenance during the reporting year included management of vegetation growth in OGE's detention basin. East Brothers (OGE's Contractor) performed the following work on April 16-17 and June 4, 2018: <ul style="list-style-type: none"> • Cleared all shrubs over 4 in at the retention basin; • Cut vegetation over 4" around the perimeter of the plant; • Cleared brow ditch of debris and encroaching plants; • Cut and spread all combustible biomass around property; • Cleared dead weeds inside the plant. 	
	The project owner shall provide in the Annual Compliance Report updates on compliance with the County Watershed Protection Ordinance as required by Soil & Water 5 and the Industrial SWPPP as required by Soil & Water 7.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report	2019-8	The submittal with Log No. 2009-176 established that an Industrial SWPPP is not required for this project, as allowed for by Soil & Water-7. OGE complies with the County watershed protection ordinance through project design and implementation of the Storm Water Management Plan. No stormwater management system or Storm Water Management Plan updates occurred during the reporting year.	
SOIL & WATER-5	The project owner shall comply with applicable requirements of the County Watershed Protection, Storm Water Management and Discharge Control Ordinance, including implementation of the Storm Water Management Plan.	NA	NA	NA	NA	NA	OGE has made no modifications to the approved storm water drainage facilities and implemented the SWMP during the reporting period.	
	The CPM shall be notified by the project owner, in writing, of any reported non-compliance with the County requirements within 10 days of the event. The written notification shall include documentation of any measures taken to correct the non-compliance and the results of those corrective measures.	Within 10 days of a reported event of non-compliance with County storm water requirements.	As needed	NA	NA	NA	There was no reported non-compliance with the County stormwater ordinance during the reporting period.	

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	The project owner shall submit copies of all updates and other correspondence between the project owner and the County regarding the Storm Water Management Plan within 10 days of receipt or submittal.	Within 10 days of receipt or submittal of correspondence.	As needed	NA	NA	NA	There was no SWMP related correspondence with the County during the reporting period.	
SOIL & WATER-8	The project owner shall comply with all recycled water requirements in Title 22 and Title 17 of the California Code of Regulations.	NA	NA	NA	NA	NA	OGE's use of recycled water complied with Title 22 and Title 17 requirements throughout the reporting period.	
	The project owner shall comply with reporting and inspection requirements set forth by California Department of Public Health (CDPH) and RWQCB. The project owner shall submit copies of all correspondence with the RWQCB and CDPH regarding recycled water use within 10 days of submittal or receipt	Within 10 days of submittal or receipt	1/28/19	NA	Submitted	2019-6	OGE provides access for inspections by jurisdictional agencies. CDPH does not require reports from OGE for recycled water use and there was no correspondence with CDPH during the reporting period. Annual reports are required by the RWQCB and a copy of the report submitted during the reporting year was provided to the CPM.	
SOIL & WATER-10	Maintain approved water metering devices for the life of the project and record volumes of fresh and recycled water separately.	NA	NA	NA	Approved.	Email	OGE complies with this requirement by maintaining the plant water piping systems as approved by the CBO. To date, the project has operated exclusively with recycled water with use quantities recorded by the supplier.	
	This Condition requires that the project owner shall obtain project water supplies from FPUD in quantities not exceed 62 AFY of potable water and 38.7 AFY of recycled water unless other volumes are approved by the CPM. The Verification includes preparation of an annual potable water and recycled water use summary giving the monthly range and monthly average of daily potable water usage and recycled water usage in gallons per day and total potable water and total recycled water used on a monthly and annual basis in acre-feet. The annual summary shall be included in the Annual Compliance Report. For years subsequent to the initial year of operation, the annual summary will also include the yearly range and yearly average for potable water used and recycled water used. For calculating the total water use, the term year will correspond to the date established for the annual compliance report submittal.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report	2019-8	To date, OGE has operated exclusively with recycled water obtained from FPUD. A Water Use Summary is provided in Exhibit SOIL&WATER-10.	SOIL & WATER-10
	If the amount of potable water and/or recycled water to be used by OGP is expected to exceed 62 and 38.7 acre-feet per year (AFY) respectively, during any annual reporting period, the project owner shall provide a written request and explanation for the anticipated water use increase to the CPM at least 60 days prior to the date when the water use limit is expected to be exceeded.	60 days prior to date that water use limit is expected to be exceeded.	As needed	NA	NA	NA	Water use was within permitted limits and it anticipated to remain so.	
SOIL & WATER-11	The project owner shall remain in compliance with the County Onsite Wastewater Treatment System (OWTS) requirements for the life of the project and provide a status report on OWTS compliance in each annual compliance report.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report	2019-8	OGE has made no modifications to the permitted OWTS. The septic tank was pumped for routine maintenance on May 9, 2017 and December 4, 2017.	
SOIL & WATER-12	After CPM approval of the initial testing and management report, and absent changes in waste stream characteristics or in the transport and disposal practices identified, the project owner shall report annually in the Annual Compliance Report the volume of facility wastewater transported and disposed of offsite and provide documentation that the wastewater was transported and disposed of in compliance with all applicable LORS.	Annual Compliance Report.	This Submittal	NA	Submitted in this Annual Report	2019-8	Exhibit SOIL & WATER-12 provides a summary of waste water generated and invoices demonstrating that the waste water was managed by a licensed contractor.	SOIL & WATER-12
SOIL & WATER-13	The project owner shall implement water conservation measures to the extent practicable for all facility operation water uses and provide offset of 6.1 AFY of potable water.	NA	NA	NA	NA	NA	OGE trucks water to the site and takes all practical measures to conserve water. To date, OGE has operated exclusively with recycled water, thereby complying with this condition.	
	The project owner shall implement the approved Water Conservation Plan for the life of the project.	NA	NA	3/12/10	NA	NA	OGE operates in conformance with the Water Conservation Plan.	

Appendix A
Orange Grove Energy
2018 Annual Compliance Matrix

Condition Number	Description of Required Action or Submittal	Date Submittal Required	Actual or Expected Submittal Date	Date Approved by CBO/CPM/ or delegate agency	Compliance Status	Log Number	Comments	Exhibit(s)
	The project owner shall report annually on the status of facility conservation, revise the conservation plan as necessary to address local conditions, and submit plan revisions to the CPM for review and approval.	Annual Compliance Reports, As needed	This Submittal	NA	NA	NA	To date, OGE has operated exclusively with recycled water. No need for revision to the Water Conservation Plan has been identified.	
VIS-1	The project owner shall provide a status report regarding maintenance of the approved exterior surface treatments in the Annual Compliance Report. The report shall specify a) the condition of the surfaces of all structures and buildings at the end of the reporting year; b) maintenance activities that occurred during the reporting year; and c) the schedule of maintenance activities for the next year.	Annual Compliance Reports	This Submittal	NA	NA	NA	The Orange Grove Power Plant is a new facility and all exterior surfaces remain in good condition. No maintenance has been required or conducted on the exterior surfaces, and no such work is planned for the next reporting period.	
VIS-2	The landscaping plan shall be submitted to the CPM for review and approval and simultaneously to the County of San Diego for review and comment at least 90 days prior to installation.	90 days prior to installation.	8-Dec-09	Not Determined.	Approved	Email	Revised signed landscaping Construction Plans were submitted to the CPM on December 8, 2009 (Log No. 2009-173). No further comments were received.	
	The Verification for this condition included the project owner simultaneously notifying the CPM and the County of San Diego within seven days after completing installation of the landscaping, that the landscaping is ready for inspection.	Within seven days of completing landscaping installation.	N/A	N/A	N/A	2014-05 2016-12	One area of landscaping remains uncompleted. CEC staff visited the site on May 10 and 11, 2011 to inspect the final landscaping and deemed it complete, except adjacent to SR-76 where staff agreed the landscaping work should be postponed, since SDG&E is developing a solar energy facility. In April 2014, OGE requested a modification to the Verification schedule of VIS-2 to delay vegetation planting near the highway until the plan for solar development is completed, since the solar project construction could damage or remove the planned vegetation or related irrigation systems (See Compliance Log No. 2014-05). Current progress is consistent with the Verification schedule delay requested in Compliance Log No. 2014-05. SDG&E obtained the necessary permits in 2015 for the planned solar power development. SDG&E submitted the landscaping Plan to the County in Late 2015 and it was approved in April of 2016. On June 21, 2016, OGE submitted (Log # 2016-12) a copy of the landscaping plan for the Solar Project and requested that the Solar Project Landscaping Plan be accepted in lieu of the postponed planting of screening vegetation described in the April 4, 2014 (OGP Compliance Log # 2014-05). The solar project has suspended construction.	
Vis-2	The project owner shall report landscape maintenance activities, including replacement of dead or dying vegetation, for the previous year of operation in each Annual Compliance Report.	Annual Compliance Reports	This Submittal	NA	Submitted	2019-8	OGE's landscaping contractor regularly performed landscape maintenance during the reporting year. No substantive vegetation replacement occurred during the reporting year. OGE submitted Request to Approve SDG&E Landscaping Plan for Solar Project in lieu of the postponed planting of screening vegetation described in the April 21, 2016 letter.	
VIS-3	Within 48 hours of receiving a lighting complaint, the project owner shall provide the CPM with a complaint resolution form report as specified in the Compliance General Conditions including a proposal to resolve the complaint, and a schedule for implementation.	Within 48 hours of receiving a complaint.	As needed	NA	NA	NA	No lighting complaints have been received.	
	The project owner shall notify the CPM within 48 hours after completing implementation of a proposed solution for a lighting complaint.	Within 48 hours of implementation.	As needed	NA	NA	NA	No lighting complaints have been received.	
	A copy of the complaint resolution form report shall be submitted to the CPM within 30 days.	Within 30 days of implementation.	As needed	NA	NA	NA	No lighting complaints have been received.	
WASTE-4	The project owner shall keep a copy of the Hazardous Waste Generator identification number on file at the project site.	NA	NA	NA	NA	NA	OGE retained a copy of the Hazardous Waste Generator ID number on the site during the reporting period.	

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WASTE-5	The project owner shall notify the CPM in writing within 10 days of becoming aware of an impending enforcement action against the project or any of its contracted waste haulers, disposal facilities, or treatment operators.	Within 10 days of becoming aware of impending enforcement action.	As needed	NA	NA	NA	No such enforcement actions have been identified.	
WASTE-7	If notified by the CPM that revisions to the Operations Waste Management Plan are needed, the project owner shall submit any required revisions to the CPM within 20 days.	Within 20 days of notification of required revisions	N/A	NA	N/A	N/A	No revisions requested by the CPM or made by OGE in 2018.	
	The project owner shall document in each Annual Compliance Report the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan; and update the Operation Waste Management Plan as necessary to address current waste generation and management practices.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report	2019-8	A Waste Management Summary is provided in Exhibit WASTE-7 and shows that routine waste generation and management were consistent with the Operations Waste Management Plan. Waste types and generation rates were similar or less than predicted in the Waste Management Plan with regard to routine wastes. Waste generation rates will vary over the life of the plant and no material changes to the Waste Management Plan are required. Some non-routine waste that were generated during the reporting period are identified in WASTE-7.	WASTE-7
WASTE-8	The project owner shall ensure that all spills or releases of hazardous materials are reported, cleaned up and remediated as required by LORS. The Verification further requires that the project owner document unauthorized releases and spills of hazardous materials on the project property. The documentation shall include, at a minimum, the following information: location of release; date and time of release; reason for release; volume released; amount of contaminated soil/material generated; how release was managed and material cleaned-up; if the release was reported; to whom the release was reported; release corrective action and cleanup requirements placed by regulating agencies; level of cleanup achieved and actions taken to prevent a similar release or spill; and disposition of any hazardous wastes and/or contaminated soils and materials that may have been generated by the release. Copies of the unauthorized spill documentation shall be provided to the CPM within 30 days of the date the release was discovered.	Within 30 days of the date the release was discovered.	As needed	NA	NA	NA	There were no spills during this reporting period.	
WORKER SAFETY-2	Implement the CPM-reviewed Project Operations and Maintenance Safety and Health Program including the:(1) Operations Injury and Illness Prevention Plan; (2) an Emergency Action Plan; (3) Hazardous Materials Management Program; (4) Operations Fire Prevention Program per 8 CCR 3221; and (5) Personal Protective Equipment Program per 8 CCR 3401-3411.	At least 30 days prior to the start of the project work	N/A	NA	N/A	N/A	OGE operated with these programs in place during the reporting year.	
WORKER SAFETY-3	The contact information of any replacement (CSS) shall be submitted to the CPM within one business day.	At least 30 days prior to the start of site mobilization, the project owner shall submit to the CPM the name and contact information for the Construction Safety Supervisor (CSS)	N/A	NA	N/A	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
WORKER SAFETY-4	The project owner shall provide proof of its agreement to fund the Safety Monitor services to the CPM for review and approval.	Prior to the start of construction	N/A	NA	N/A	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
WORKER SAFETY-5	The project owner shall submit to the CPM proof that a portable automatic external defibrillator (AED) exists on-site, and a copy of the training and maintenance program for review and approval.	At least 30 days prior to the start of site mobilization	NA	NA	NA	NA	OGE maintained an AED onsite during the reporting year. OGE site staff for the reporting year have received Red Cross training including AED operation training.	
WORKER SAFETY-6	The project owner shall provide proof of fire and EMS services to the CPM for review and approval.	At least 30 days prior to the start of any site activities	NA	NA	NA	NA	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	

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Condition Number	Description of Required Action or Submittal	Date Submittal Required	Actual or Expected Submittal Date	Date Approved by CBO/CPM/ or delegate agency	Compliance Status	Log Number	Comments	Exhibit(s)
GEN-1	The project owner shall inform the CPM at least 30 days prior to any construction, addition, alteration, moving, demolition, repair, or maintenance to be performed on any portion(s) of the completed facility that requires code compliance. The CPM will then determine if the CBO needs to approve the work.	30 days prior to any construction, addition, alteration, moving, demolition, repair, or maintenance to be performed on any portion of the completed facility.	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
GEN-2	The project owner shall submit to the CBO and to the CPM the schedule, the master drawing, and master specifications lists of documents to be submitted to the CBO for review and approval. These documents shall be the pertinent design documents for the major structures and equipment listed in FACILITY DESIGN Table 1.	At least 60 days prior to the start of project	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
GEN-4	The project owner shall assign a California registered architect, structural engineer, or civil engineer as the resident engineer in charge of the project.	At least 30 days prior to project	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
GEN-6	The project owner shall submit to the CBO for review and approval, with a copy to the CPM, the name(s) and qualifications of the certified weld inspector(s) or other certified special inspector(s) assigned to the project to perform one or more of the duties set forth above. The project owner shall also submit to the CPM a copy of the CBO's approval of the qualifications of all special inspectors in the next monthly compliance report.	At least 15 days (or within a project owner and CBO approved alternative time frame) prior to the start of an activity requiring special inspection.	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
GEN-8	The project owner shall retain one paper set of final CBO-approved engineering plans, specifications, and calculations (including all approved changes) at the project site or an approved alternative site for the life of the project. Electronic copies of the approved plans, specifications, calculations and marked-up as-builts shall be provided to the CBO for retention by the CPM.	Prior to issuance of the Certificate of Occupancy.	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
	The project owner shall retain one paper set of final CBO-approved engineering plans, specifications, and calculations (including all approved changes) at the project site or an approved alternative site for the life of the project. Electronic copies of the approved plans, specifications, calculations and marked-up as-builts shall be provided to the CBO for retention by the CPM.	Within 90 days of the completion of construction the project owner, at its own expense, shall provide to the CBO three sets of electronic copies of the above documents.	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
STRUC-1	The project owner shall submit to the CBO the final design plans, specifications, and calculations, with a copy of the transmittal letter to the CPM.	At least 60 days (or within a project owner and CBO approved alternative time frame) prior to the start of any increment of construction of any structure or component listed in FACILITY DESIGN Table-1 of Condition of Certification GEN-2	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
STRUC-2	The project owner shall submit to the CBO the required number of sets of the following documents related to work that has undergone CBO design review and approval: 1. Bolt torque inspection reports (including location of test, date, bolt size, and recorded torques); 2. Field weld inspection reports (including type of weld, location of weld, inspection of non-destructive testing procedure and results, welder qualifications, certifications, qualified procedure description or number (ref. AWS). The project owner shall transmit a copy of the CBO's approval or disapproval of the corrective action to the CPM within 15 days. If disapproved, the project owner shall advise the CPM, within five days, of the reason for disapproval and the revised corrective action necessary to obtain the CBO's approval.	Within 15 days	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	

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	The project owner shall submit a copy of the corrective action to the CBO and the CPM.	Within five days of resolution of the NCR	NA	NA	NA	NA		
	The project owner shall transmit a copy of the CBO's approval or disapproval of the corrective action to the CPM.	Within 15 days.	NA	NA	NA	NA		
	If disapproved, the project owner shall advise the CPM of the reason for disapproval and the revised corrective action necessary to obtain the CBO's approval.	Within five days.	NA	NA	NA	NA		
MECH-1	The project owner shall submit, for CBO design review and approval, the proposed final design, specifications, and calculations for each plant major piping and plumbing system listed in FACILITY DESIGN Table 1, Condition of Certification GEN-2, above. Physical layout drawings and drawings not related to code compliance and life safety need not be Submitted. The submittal shall also include the applicable QA/QC procedures.	At least 30 days (or within a project owner and CBO approved alternative time frame) prior to the start of any increment of major piping or plumbing construction listed in FACILITY DESIGN Table 1, Condition of Certification GEN-2.	N/A	NA	NA	N/A	Not applicable during this reporting period. This requirement applied during the SCR/COC work in 2016.	
TRANS-4	This Condition requires that no more than two water truck deliveries occur per hour during operations. The Verification for this condition requires a log of daily water deliveries to be maintained onsite and provide in a quarterly report.	4/30/18 7/30/18 10/30/18 1/30/19	4/24/18 7/24/18 10/30/18 1/28/19	NA	Submitted	2017-10 2017-14 2017-17 2018-4	OGE operations were in compliance with this permit condition during the reporting year with less than two water truck deliveries per hour. Water truck logs were provided with the Quarterly reports to CEC and demonstrate compliance with this condition.	
	Project water trucks shall be Class 9 or higher.	NA	NA	NA	NA	NA	OGE used Class 9 water trucks to haul water for the project throughout the reporting period.	
	Project water trucks hauling recycled water shall contain signage which reads, "Recycled Water - Do Not Drink."	NA	NA	NA	NA	NA	OGE's water trucks are signed as required.	
	Project water trucks shall display in large type on the face of the back of each truck that provides a phone number to call to register complaints about the water delivery trucks.	NA	NA	NA	NA	NA	OGE's water trucks are signed as required.	
	The project owner shall maintain a telephone number with automated answering and time and date stamp for use by the public to report any unsafe traffic conditions associated with project water delivery trucks. Any complaints about the water trucks shall be reported to the CPM within 24 hours. A sign with the telephone number shall be maintained posted at the project site where it is visible to passersby.	Reporting required within 24 hours of a complaint	NA	NA	NA	NA	OGE displays signage with the complaint telephone number on water trucks and at the project. There were no complaints made during this reporting period.	
TRANS-5	The project owner shall document, investigate, evaluate and attempt to resolve all water delivery truck complaints using form and procedures of TRANS-5.	NA	NA	NA	NA	NA	There were no water delivery truck complaints during this reporting period.	
	Within five days of receiving a complaint, the project owner shall file a Water Truck Traffic Complaint Resolution Form, shown below, with both the local jurisdiction and the CPM that documents the resolution of the complaint.	Within five days of receiving a complaint	NA	NA	NA	NA	There were no water delivery truck complaints during this reporting period.	
	If mitigation is required to resolve the complaint, and the complaint is not resolved within a three-day period, the project owner shall submit an updated Water Truck Traffic Complaint Resolution Form when the mitigation is performed and complete.	When the mitigation is complete.	NA	NA	NA	NA	There were no water delivery truck complaints during this reporting period.	
COMPLIANCE-5	A compliance matrix with specified information fields is required with the annual compliance report.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report.	2019-8	Included herein.	
COMPLIANCE-7	Following construction, Annual Compliance Reports shall be submitted by a date agreed to by the CPM providing specified information.	Annual Compliance Reports	This Submittal	NA	Submitted in this Annual Report.	2019-8	Included herein.	
COMPLIANCE-8	Procedures for submittal of confidential information.	NA	As needed	NA	NA	NA	NA	
COMPLIANCE-9	Project Owner shall pay an annual compliance fee by July 1, made payable to the California Energy Commission and mailed to: Accounting Office, MS-02, California Energy Commission, 1516 9th street, Sacramento, CA 95814.	7/1 (EACH YEAR)	Prior to 7/1 (annually)	NA	NA	NA	Annual Energy Facility Compliance Fee paid in 2018.	

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COMPLIANCE-10	Any change to the telephone number set up and posted to receive complaints shall be reported immediately to the CPM.	As Required.	NA	NA	NA	NA	The telephone number has not changed.	
	Record all complaints using CEC-provided forms and provide copies of all complaint forms, notices of violations, official warnings, and citations to the CPM within 10 days of receipt.	Within 10 days of receiving a complaint, NOV, warning or citation.	NA	NA	NA	NA	No complaints, citations or notices of violation (NOV) were issued to OGE in 2018.	
COMPLIANCE-11	The project owner shall submit a closure plan 12 months before initiating permanent closure.	12 Months prior to planned permanent closure.	To be determined	NA	NA	NA	OGE does not anticipate permanent closure in the near future.	
COMPLIANCE-12	The approved on-site [closure] contingency plan shall be kept at the site at all times and shall be updated in consultation with the CPM As needed. In the Annual Compliance Report, the owner shall indicate that they have reviewed the plan and any recommended changes shall be addressed. Any changes must be approved by the CPM. In addition, the status of the insurance coverage and major equipment warranties must be updated in the annual compliance reports.	Annual Compliance Reports	3/14 (annually)	NA	Submitted in this Annual Report.	2019-8	OGE maintains a copy of the approved closure contingency plan onsite. A review of the contingency plan was conducted for this Annual Compliance Report No changes were recommended. OGE maintained insurance and major equipment warranties as required during the reporting period.	
COMPLIANCE-13	In the event of an unplanned permanent or temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. For temporary closure, the project owner shall keep the CPM informed of the circumstances and expected duration of closure. If the CPM determines that an unplanned temporary closure is likely to be permanent, or for a duration of more than 12 months, a closure plan shall be submitted to the CPM within 90 days of the CPMs determination. For a permanent closure the closure plan shall be submitted within 90 days of the closure.	Within 24 hours of unplanned closure.	NA	NA	NA	NA	No unplanned closure occurred during the reporting period nor is any such event foreseeable at this time.	
COMPLIANCE-14	The project owner must petition the Energy Commission pursuant to Title 20, California Code of Regulations, section 1769, in order to modify the project (including linear facilities) design, operation or performance requirements, and to transfer ownership or operational control of the facility. A petition is required for amendments and for insignificant project changes as specified within COMPLIANCE-14. Both shall be filed as a "Petition to Amend." Staff will determine if the change is significant or insignificant. For verification changes, a letter from the project owner is sufficient. In all cases, the petition or letter requesting a change should be submitted to the CPM, who will file it with the Energy Commission's Dockets Unit in accordance with Title 20, California Code of Regulations, section 1209.	Prior to the implementation of any change in the project design, ownership, or verification process.	NA	NA	NA	NA	No petitions filed in 2018.	

Exhibit BIO-2

Designated Biologist Report

March 8, 2019

Orange Grove Energy, L.P.
Attn: Ramiro Garcia
35435 Pala Del Norte Road
Pala, CA 92059

Subject: Year 8 Annual Compliance Report Biological Summary, Pala, CA

Mr. Garcia,

Condition of Approval BIO-2 in the Final Commission Decision for the Orange Grove Power Plant [California Energy Commission (CEC) Docket No. 8-AFC-4]] requires that a Designated Biologist, approved by the CEC's Compliance Project Manager, conduct or supervise mitigation monitoring and other biological resource compliance efforts during the life of power plant operations. The Verification for BIO-2 specifies that the Designated Biologist shall submit record summaries in the Annual Compliance Report. This memorandum reports on the implementation of the Worker Environmental Awareness Program (WEAP), annual monitoring of the Parry's tetracoccus mitigation progress, and fire break vegetation clearance. October 2018 marked the end of Year 8 for the Parry's tetracoccus restoration monitoring and maintenance period.

Worker Environmental Awareness Training

Pursuant to Condition of Certification BIO-4, WEAP training is required for all operations staff. The Designated Biologist, as described in prior Annual Compliance Reports, conducted WEAP training through 2015. After receiving an in-depth trainer level WEAP training, the Orange Grove Energy Compliance Manager, Ramiro Garcia, has been administering the WEAP training since 2016. Mr. Garcia provided 2018 WEAP training to the OGE staff and subcontractors on April 10 and 16 and November 29, 2018. Sign-in sheets are attached.

Parry's Tetracoccus Restoration Monitoring

Pursuant to Condition of Certification BIO-11, a 0.09 acre portion of the 8.5-acre power plant site was designated for compensatory mitigation for unavoidable impacts to Parry's tetracoccus (*Tetracoccus dioicus*), a geographically restricted, gabbro soil-requiring shrub species included on California Native Plant Society list 1B: species rare within and beyond California. The TRC August 2008 *Parry's Tetracoccus Conceptual Mitigation Plan* identified qualitative and quantitative performance standards for mitigation site success. The performance standard is to establish at least 23 self-sustaining Parry's tetracoccus plants within the restoration area after a five-year restoration period. The April 2011 TRC *As-Built Restoration Report for Parry's Tetracoccus Mitigation Site, Orange Grove Power Plant, Pala, San Diego County, California* reported survival of 51 of 60 shrubs initially planted in June 2010, as of October of that year.

November 13, 2018 Annual Site Evaluation

The Designated Biologist, Ms. Alicia Cooper Hill, conducted a qualitative and quantitative assessment of the mitigation site on November 13, 2018 in support of this annual compliance report. The mitigation site was characterized by coastal sage scrub vegetation consisting of black sage (*Salvia mellifera*), white sage (*Salvia apiana*), deerweed (*Acmispon glaber*), sugar bush (*Rhus ovata*), lemonade berry (*Rhus integrifolia*), laurel sumac (*Malosma laurina*), scrub oak (*Quercus berberidifolia*), and Parry's tetracoccus. Laurel sumac and black dominated the site and native shrubs had been trimmed around certain individuals by the restoration contractor, D&D Wildlife Habitat Restoration, Inc. (D&D), to prevent encroachment on the Parry's tetracoccus plants. Absolute vegetated cover was approximately 80% with relative native cover estimated at 80% and non-native cover was less than 1%.

A total of ten alive and well established Parry's tetracoccus were identified within the mitigation site, where all were observed in good health. The one individual that was observed in poor health during the Year 7 monitoring period died in late summer of 2018. D&D planted 6 one-gallon container plants on November 13 and 7 one-gallon container plants on November 19, 2018 throughout the site. They installed shade cloth above the container plants in order to protect the plants from the sun and heat. Parry's tetracoccus shrub heights varied considerably, ranging between 60 to 170 centimeters (cm), where the average height was 122 cm. The health of all Parry's tetracoccus was good, with the shrubs exhibiting normal foliage coloring consistent with the time of year and showing no to little signs of stress or degradation from pests, disease, soil moisture content, or other factors. No sign of trash accumulation, vandalism, erosion or other problems were observed. The attached Photo Exhibit provides current plant growth within the restoration area.

Restoration Contractor Maintenance, Monitoring, and Propagation

D&D continued to conduct regular maintenance activities monthly between January through November 2018. They pruned shrubs away from the Parry's tetracoccus plants, weeded non-native plants, and watered the plants, as needed. Soil moisture was monitored closely by D&D at every maintenance visit to ensure each plant was receiving an appropriate amount of water.

D&D, along with Tree of Life Nursery, attempted to grow Parry's tetracoccus during Year 7 and Year 8. Plants were grown from collected seeds, as well as cuttings. Hundreds of plants were grown; however, only 13 survived as of November 2018. Parry's tetracoccus is extremely difficult to propagate successfully. It is a very slow growing plant and it is very difficult to create the ideal growing environment.

Year 9 Summary and Plan

The Parry's tetracoccus shrub count of 23 individuals at the end of the Year 8 monitoring period met the performance standard of 23 individuals, as established by the *Parry's Tetracoccus Conceptual Mitigation Plan*. The performance success standards are based on the plants being self-sustaining for at least two years (i.e. two summers). Restoration monitoring will extend through at least through October 2020 (Year 10). However, at the time of this memo, there are 18 healthy individuals remaining.

The following measures are recommended to continue to occur in order to increase the probability of reaching and sustaining the performance standard of 23 self-sustaining plants:

- Continue to propagate and install 10-15 supplemental container plantings within the restoration site in November 2019
- Water all plants every 60 days and manual weed removal as needed
- Protect any exposed roots at the trunk by installing native dirt around plants with spongy soil, concavity surrounding the trunk, and/or exposed roots, as needed
- Monitor soil moisture closely in order to ensure the plants are healthy
- Spray organic pesticides or release native pest predators on sickly individuals, as needed.

Project Personnel List

The following table includes all personnel who prepared the content of the annual report and/or participated in the Parry's tetracoccus restoration maintenance activities during this reporting period.

Table 1. Restoration Personnel List

Name	Project Title	Company
John Hutson	Plant Manager	Orange Grove Energy, L.P.
Ramiro Garcia	Compliance Manager	Orange Grove Energy, L.P.
Alicia Cooper Hill	Designated Biologist	Halcyon Environmental, Inc
Douglas W. McKinney	President and Project Manager	D&D Wildlife Habitat Restoration, Inc.
Eulogio Salcedo	Working Supervisor	D&D Wildlife Habitat Restoration, Inc.
Martin Ramos	Lead Laborer	D&D Wildlife Habitat Restoration, Inc.
Daniel Lopez	Laborer	D&D Wildlife Habitat Restoration, Inc.
Robert Mazalewski	Pest Control Advisor, Certified Arborist and Horticulturist	D&D Wildlife Habitat Restoration, Inc.
Jesus A. Reyes	Licensed Pest Applicator and Working Supervisor	D&D Wildlife Habitat Restoration, Inc.
Arturo Salcedo	Lead Restoration Laborer	D&D Wildlife Habitat Restoration, Inc.

Fire Break Vegetation Clearance

OGE is required to maintain a defensible space around the power plant and access roads. OGE's landscape contractor performed vegetation maintenance within the defensible space on April 16-17, 2018 and June 4, 2018 following surveys for nesting birds by Ms. Cooper Hill. Active nests were avoided and the vegetation trimming activities did not adversely affect any nests. A memorandum summarizing these activities is attached.

Please refer any questions regarding the information in this memorandum to Alicia Cooper Hill at (760) 533-9667.

Sincerely,



Alicia Cooper Hill
Designated Biologist, Halcyon Environmental

Attachments:

- Photo Exhibit
- WEAP Training Sign-in Sheets (3)
- Nesting Bird Survey Memorandum

Photo Exhibit

Client:	Orange Grove Energy, L.P.	Photography:	Halcyon Environmental, Inc
Project:	Parry's Tetracoccus Restoration Monitoring Year 8	Location:	Pala, California
Date Taken:	November 13, 2018		



Photograph # 1
Delineated restoration area facing east.



Photograph # 2
East side of restoration area facing west showing revegetation sign demarcating the area.

Photo Exhibit

Client:	Orange Grove Energy, L.P.	Photography:	Halcyon Environmental, Inc
Project:	Parry's Tetracoccus Restoration Monitoring Year 8	Location:	Pala, California
Date Taken:	November 13, 2018		



Photograph # 3

Parry's tetracoccus growth within restoration area facing east.



Photograph # 4

Northeastern edge of restoration area showing Orange Grove Power Plant in background facing southwest.

Photo Exhibit

Client:	Orange Grove Energy, L.P.	Photography:	Halcyon Environmental, Inc
Project:	Parry's Tetracoccus Restoration Monitoring Year 8	Location:	Pala, California
Date Taken:	November 13, 2018		



Photograph # 5

Northern border of restoration area facing south.



Photograph # 6

Parry's tetracoccus container plants before planting on November 13, 2018.

Photo Exhibit

Client:	Orange Grove Energy, L.P.	Photography:	Halcyon Environmental, Inc
Project:	Parry's Tetracoccus Restoration Monitoring Year 8	Location:	Pala, California
Date Taken:	November 13, 2018		



Photograph # 7
Newly planted Parry's tetracoccus



Photograph # 8
Newly planted Parry's tetracoccus underneath installed shade cloth.



OGE Environmental Training

Date: April 10, 2018

Instructor: Ramiro Garcia

Topic: Workers Environmental Awareness Program (WEAP)
See Enclosed Training Material

By signing this sheet, you agree that you have been made aware of the biological conditions at the plant site and agree to follow guidelines and measures set out by the Designated Biologist in the Worker Environmental Awareness Program (WEAP).

Attendees

Name	Signature
Gregory Stephens	



OGE Environmental Training

Date: April 16, 2018

Instructor: Ramiro Garcia

Topic: Workers Environmental Awareness Program (WEAP)
See Enclosed Training Material

By signing this sheet, you agree that you have been made aware of the biological conditions at the plant site and agree to follow guidelines and measures set out by the Designated Biologist in the Worker Environmental Awareness Program (WEAP).

Attendees

Name	Signature
GUSTAVO ESPINZA SOTO	<i>Gustavo Espinza Soto</i>
<i>Nabor Perez</i>	<i>Nabor Perez</i>
Juan M Contreras	<i>Juan M Contreras</i>
Roberto Contreras	<i>Roberto Contreras</i>



Environmental Training

Date: November 29, 2018

Instructor: Ramiro Garcia

Topic: Workers Environmental Awareness Program (WEAP)
See Enclosed Training Material

By signing this sheet, you agree that you have been made aware of the biological conditions at the plant site and agree to follow guidelines and measures set out by the Designated Biologist in the Worker Environmental Awareness Program (WEAP).

Attendees

Name	Signature
Lea Barton	
John Hutson	
Al Deluna	
Paul Braemer	
Tony Moretto	
Ramiro Garcia	
Gregg Stephens	

June 5, 2018

Orange Grove Energy, L.P.
Ramiro Garcia
35435 Pala Del Norte Road
Pala, CA 92059

Subject: Annual Fire Protection Brush Clearance Nesting Bird Survey Memo, Pala, CA

Mr. Garcia,

The following memorandum provides a summary of nesting bird surveys conducted over two survey days prior to annual fire protection brush trimming at the Orange Grove Energy Plant. Designated project biologist, Alicia Cooper Hill, conducted a general nesting bird survey covering 100% of the proposed work area (Survey Area) on April 15 and May 28 and 31, 2018. The Survey Area consisted of the mapped fuel modification zones on the Landscaping Plan (L100, 2007) and adjacent areas.

The Survey Area adjacent to Pala Del Norte Road consisted of disturbed coastal sage scrub. The Survey Area adjacent to the OGEC emergency access road consisted of landscaped vegetation including native some native vegetation. The habitat located within the OGEC retention basin was dominated by re-sprouting native mulefat (*Baccharus salicifolia*). Ms. Cooper Hill conducted the survey through a combination of passive observation periods followed by focused observation of specific areas where birds were observed exhibiting higher levels of activity or potential nesting behavior. When conducting passive surveys, Ms. Cooper Hill observed from select vantage points that provided maximum visibility of the survey area while specifically looking for breeding birds and potential nesting behaviors such as courtship behavior, carrying of nesting material and/or food items. If potential nesting behavior was observed, specific shrubs, trees, or structures were directly searched at close range for an active nest.

RESULTS

Two active nests were located during the initial nesting bird survey on April 15. The first nest identified on April 15 was a California Thrasher nest 10 feet from the fuel modification zone B in the northeast corner of the property within a laurel sumac (*Malosma laurina*). The nest contained eggs and was being incubated by an adult. On May 28 the nest was confirmed to be inactive. No vegetation or restoration maintenance activities occurred within 100 feet of the nest.

The second nest observed was a Black Phoebe nest within the retention basin overflow concrete structure. The nest contained eggs and was believed to have been currently incubated by the adults as they were observed nearby. On May 28 the nest was confirmed to be inactive. No vegetation or restoration maintenance activities occurred within 100 feet of the nest.

The following bird species were observed during the surveys: California Quail, Mourning Dove, Anna's Hummingbird, Black Phoebe, Say's Phoebe, Common Raven, Northern Rough-winged Swallow, Ash-



throated Flycatcher, Western Kingbird, Hooded Oriole, Orange-crowned Warbler, Mallard, Red-tailed Hawk, White-crowned Sparrow, Tree Swallow, American Kestrel, Rock Wren, Wrentit, Northern Mockingbird, California Towhee, Spotted Towhee, Black-headed Grosbeak, Phainopepla, California Thrasher, California Scrub-Jay, Rufous-crowned Sparrow, Lesser Goldfinch, Bushtit, Bewick's Wren, and House Finch.

Weather Conditions

April 15, 2018:

Start: 0700, 61°F, 2-5 mph, 75% cloud cover

End: 1015, 69°F, 3-4 mph, 60% cloud cover

May 28, 2018:

Start: 0720, 64°F, 0-1 mph, 70% cloud cover

End: 0750, 64°F, 0-1 mph, 70% cloud cover

May 31, 2018:

Start: 0750, 66°F, 0-1 mph, 60% cloud cover

End: 0830, 69°F, 0-1 mph, 50% cloud cover

CONCLUSIONS

The vegetation crew used weed whackers to trim the vegetation from the western entrance bridge to the northeast corner of the property, north of the security fence on April 16 and 17. No work occurred within 100 feet of the California Thrasher nest and no work occurred within 130 feet of the Black Phoebe. The construction crew completed the vegetation trimming activities on June 4 after the nests were verified to be empty on May 28, 2018.

If you have any questions or comments, please do not hesitate to contact me at (760) 533-9667.

Sincerely,



Alicia Cooper Hill
Designated Biologist
Halcyon Environmental

Exhibit HAZ-1

2018 Hazardous Materials Inventory

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Aqueous Ammonia Tank	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Aqueous Ammonia	Gallons	8500	10000	5000		- Health Skin	Ammonia	19 %	✓ 1336-21-6
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Corrosion			
		Liquid	Aboveground Tank		Ambient		Irritation			
	Map: 3	<u>Type</u>			<u>Temperature</u>		- Health Specific			
		Mixture	Days on Site: 365		Ambient		Target Organ			
							Toxicity			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Battery Room, Diesel Fire Pump, Black Start Generator	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Lead Acid Batteries	Gallons	285	10	285		- Physical	Sulfuric Acid	40 %	✓ 7664-93-9
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Explosive			
		Liquid	Other		Ambient		- Health			
	Map: 3, 4	<u>Type</u>			<u>Temperature</u>		Carcinogenicity			
		Mixture	Days on Site: 365		Ambient		- Health Acute			
							Toxicity			
							- Health			
							Reproductive			
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Cooling Tower	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Acetylene Welding Gas	Cu. Feet	260	130	100		- Physical Flammable - Physical Gas Under Pressure - Physical Explosive - Health Simple Asphyxiant			
	<u>CAS No</u> 74-86-2 Map: 3	<u>State</u> Gas <u>Type</u> Pure	<u>Storage Container</u> Cylinder Days on Site: 365		<u>Pressue</u> > Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				
	CSC-402	Gallons	55	55	55		- Health Acute Toxicity - Health Serious Eye Damage Eye Irritation	sodium nitrate sodium nitrite sodium metaborate phenolphthalein	5 % 5 % 2 % 2 %	7631-99-4 7632-00-0 10555-76-7 77-09-8
	<u>CAS No</u> Map: 3	<u>State</u> Liquid <u>Type</u> Mixture	<u>Storage Container</u> Plastic/Non-metalic Drum Days on Site: 365		<u>Pressue</u> Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				
	CWT-272	Gallons	55	55	55		- Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	sodium hydroxide	1 %	1310-73-2
	<u>CAS No</u> Map: 3	<u>State</u> Liquid <u>Type</u> Mixture	<u>Storage Container</u> Plastic/Non-metalic Drum Days on Site: 365		<u>Pressue</u> Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				
	Oxygen Welding Gas	Cu. Feet	200	130	100		- Physical Flammable - Physical Gas Under Pressure - Physical Explosive - Physical Oxidizer			
	<u>CAS No</u> 07782-44-7 Map: 3	<u>State</u> Gas <u>Type</u> Pure	<u>Storage Container</u> Cylinder Days on Site: 365		<u>Pressue</u> > Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				
	Peroxyacetic Cooling Water Additive	Gallons	110	55	75		- Physical Oxidizer - Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation			
	<u>CAS No</u> Map: 3	<u>State</u> Liquid <u>Type</u> Mixture	<u>Storage Container</u> Plastic/Non-metalic Drum Days on Site: 365		<u>Pressue</u> Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				
	Scale/Corrosion Control Solution	Gallons	130	65	40					
	CWT-280	<u>State</u> Liquid <u>Type</u> Mixture	<u>Storage Container</u> Tote Bin Days on Site: 365		<u>Pressue</u> Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				
	<u>CAS No</u> Map: 3									

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Cooling Tower	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Sulfuric Acid <small>CAS No 7664-93-9 Map: 3</small>	Pounds	130	65	50		- Physical Corrosive To Metal - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	Sulfuric Acid	93 %	✓ 7664-93-9
	THPS Microbiocide (Tolcide PS 20A) <small>CAS No 55566-30-8 Map: 3</small>	Gallons	65	65	40		- Health Acute Toxicity - Health Reproductive Toxicity - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation	Tetra (hydroxymethyl) phosphonium sulfate	22 %	55566-30-8
	ZOK Turbine Cleaning Solution <small>CAS No Map: 3</small>	Gallons	110	55	55		- Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Emergency Diesel Fire Water Pump Fuel Tank	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	No. 2 Diesel	Gallons	500	500	450		- Physical			
	<u>CAS No</u> 68476-34-6	<u>State</u> Liquid	<u>Storage Container</u> Aboveground Tank		<u>Pressue</u> Ambient	<u>Waste Code</u>	Flammable			
	Map: 4	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		- Health Skin			
							Corrosion			
							Irritation			
							- Health Serious			
							Eye Damage Eye			
							Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Hazardous Material Container Storage	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Used Oil	Gallons	110	55	25	200	- Physical			
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Flammable			
	Map: 2	Liquid	Steel Drum		Ambient	221	- Health			
		<u>Type</u>			<u>Temperature</u>		Reproductive			
		Waste	Days on Site: 365		Ambient		Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health			
							Aspiration Hazard			
							- Health Germ			
							Cell Mutagenicity			
	Waste Oily Solids	Pounds	1600	400	125	2400	- Physical			
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Flammable			
	Map: 2	Solid	Steel Drum		Ambient	223				
		<u>Type</u>			<u>Temperature</u>					
		Waste	Days on Site: 365		Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP	Chemical Location Machine Shop	CERS ID 10373959
Facility Name ORANGE GROVE ENERGY, LP		Facility ID 37-000-211630
35435 E PALA DEL NORTE RD, PALA 92059		Status Submitted on 1/29/2019 3:44 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Argon Welding Gas (75% Argon/25% Carbon Dioxide)	Cu. Feet	260	130	100		- Physical Gas Under Pressure	Carbon Dioxide	25 %	124-38-9
	<u>CAS No</u> 7440-37-1 Map: 4	<u>State</u> Gas <u>Type</u> Mixture	<u>Storage Container</u> Cylinder Days on Site: 365		<u>Pressue</u> > Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				
	Calibration Gas (Nitrogen)	Cu. Feet	560	300	300		- Physical Gas Under Pressure			
	<u>CAS No</u> 07727-37-9 Map: 4	<u>State</u> Gas <u>Type</u> Pure	<u>Storage Container</u> Cylinder Days on Site: 365		<u>Pressue</u> > Ambient <u>Temperature</u> Ambient	<u>Waste Code</u>				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location RO Water Treatment Structure	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Scale/Corrosion Control Solution	Gallons	130	65	45		- Health Acute Toxicity	1-Hydroxyethylidene-1, 1-	1 %	2809-21-4
	MPC-890	<u>State</u> Liquid	<u>Storage Container</u> Tote Bin		<u>Pressue</u> Ambient	<u>Waste Code</u>	- Health Skin Corrosion	Diphosphonic Acid Phosphorous Acid, Ortho	1 %	13598-36-2
	<u>CAS No</u>	<u>Type</u> Mixture	Days on Site: 365		<u>Temperature</u> Ambient		Irritation	Sodium Hydroxide	2 %	1310-73-2
	Map: 4						- Health Serious Eye Damage Eye Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP	Chemical Location Transformers (6)	CERS ID 10373959
Facility Name ORANGE GROVE ENERGY, LP		Facility ID 37-000-211630
35435 E PALA DEL NORTE RD, PALA 92059		Status Submitted on 1/29/2019 3:44 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Mineral Insulating Oil (non PCB)	Gallons	11144	4882	11144		- Physical Flammable			
	<u>CAS No</u> 8012-95-1	<u>State</u> Liquid	<u>Storage Container</u> Other		<u>Pressue</u> Ambient	<u>Waste Code</u>				
	Map: 2	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Turbines 1 and 2	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	Carbon Dioxide	Cu. Feet	24360	870	24360		- Physical Gas Under Pressure - Health Simple Asphyxiant	Carbon Dioxide	100 %	124-38-9
	<u>CAS No</u> 124-38-9	<u>State</u> Gas	<u>Storage Container</u> Aboveground Tank		<u>Pressue</u> > Ambient	<u>Waste Code</u>				
		<u>Type</u> Pure			<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Unit 1 and 2 Emissions Monitoring Systems	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Compressed Oxygen Gas	Cu. Feet	292	146	200		- Physical			
	<u>CAS No</u> 7782-44-7	<u>State</u> Gas	<u>Storage Container</u> Cylinder		<u>Pressue</u> > Ambient	<u>Waste Code</u>	Flammable			
	Map: 3	<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient		Under Pressure			
							- Physical Oxidizer			
							- Physical SelfReactive			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Unit 1 and 2 Lube Oil Reservoirs, Haz Mat Storage, Fuel Gas Compressors	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS
	Mineral Lubricating Oil	Gallons	1270	550	1270		- Physical			
	<u>CAS No</u> 99551-14-1 Map: 2, 3	<u>State</u> Liquid	<u>Storage Container</u> Steel Drum, Other		<u>Pressue</u> Ambient	<u>Waste Code</u>	Flammable			
		<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Unit 1 and Unit 2 Lube Oil Reservoirs, Haz Mat Storage Area	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Hydraulic Oil	Gallons	110	55	110		- Physical			
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Flammable			
	Map: 2, 3	<u>Liquid</u>	Other		<u>Ambient</u>					
		<u>Type</u>			<u>Temperature</u>					
		Pure	Days on Site: 365		<u>Ambient</u>					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP	Chemical Location Units 1 and 2 Emission Monitoring Systems	CERS ID 10373959
Facility Name ORANGE GROVE ENERGY, LP		Facility ID 37-000-211630
35435 E PALA DEL NORTE RD, PALA 92059		Status Submitted on 1/29/2019 3:44 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Compressed Nitrogen Mixed Gasses	Cu. Feet	6424	146	4300	- Physical Gas	Oxygen	24 %	7782-44-7	
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Nitric Oxide	2 %	10102-43-9	
		Gas	Cylinder		> Ambient		Carbon Monoxide	20 %	630-08-0	
		<u>Type</u>			<u>Temperature</u>					
	Map: 3	Mixture	Days on Site: 365		Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Units 1 and 2 Emissions Monitoring Systems	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
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DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS
	Compressed Nitrogen Gas	Cu. Feet	1168	146	800		- Physical Gas Under Pressure			
	<u>CAS No</u> 7727-37-9	<u>State</u> Gas	<u>Storage Container</u> Cylinder		<u>Pressue</u> > Ambient	<u>Waste Code</u>	- Physical Explosive			
		<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. ORANGE GROVE ENERGY, LP Facility Name ORANGE GROVE ENERGY, LP 35435 E PALA DEL NORTE RD, PALA 92059	Chemical Location Units 1 and 2, Haz Mat Storage Area	CERS ID 10373959 Facility ID 37-000-211630 Status Submitted on 1/29/2019 3:44 PM
--	---	---

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Synthetic Lubricating Oil	Gallons	460	175	460		- Physical	1-Naphthylamine, N-Phenyl	1 %	90-30-2
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Flammable	Tricresyl Phosphate	3 %	1330-78-5
	<u>Map: 3</u>	<u>Type</u>	<u>Days on Site: 365</u>		<u>Temperature</u>					
		Mixture			Ambient					

Exhibit SOIL&WATER-10

2018 Water Use Summary

Exhibit SOIL & WATER-10
Orange Grove Energy, L.P. - Recycled Water Usage
2018 Annual Report

Units	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Annual 2011
325851													
Acre Feet	0.934	0.330	0.380	0.568	0.686	0.384	0.736	0.237	0.711	0.348	0.309	0.374	6.00
Gallons	304,345	107,531	123,823	185,083	223,534	125,257	239,987	77,136	231,680	113,331	100,688	121,868	1,954,264
Average gpd	9,818	3,840	3,994	6,169	7,211	4,175	7,742	2,488	7,723	3,656	3,356	3,931	5,354
Monthly Average gpd range	2,488 - 9,818												
Annual Average gpd	5,354												

Units	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12	Nov-12	Dec-12	Annual 2012
325851													
Acre Feet	1.169	0.819	0.896	1.421	1.777	3.060	4.499	6.276	6.997	5.585	3.769	1.642	37.91
Gallons	381,000	267,000	292,000	463,000	579,000	997,000	1,466,000	2,045,000	2,280,000	1,820,000	1,228,000	535,000	12,353,000
Average gpd	12,290	9,207	9,419	15,433	18,677	33,233	47,290	65,968	76,000	58,710	40,933	17,258	33,751
Monthly Average gpd range	9,207 - 76,000												
Annual Average gpd	33,751												

Units	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Annual 2013
325851													
Acre Feet	0.721	1.062	1.559	2.406	2.185	1.544	1.866	1.424	2.925	1.525	0.884	1.206	19.31
Gallons	235,000	346,000	508,000	784,000	712,000	503,000	608,000	464,000	953,000	497,000	288,000	393,000	6,291,000
Average gpd	7,581	12,357	16,387	26,133	22,968	16,767	19,613	14,968	31,767	16,032	9,600	12,677	17,236
Monthly Average gpd range	7,581-31,767												
Annual Average gpd	17,236												

Units	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Annual 2014
325851													
Acre Feet	1.642	1.801	1.096	1.366	2.351	1.808	1.909	1.749	2.351	2.872	1.326	0.74	21.01
Gallons	535,000	587,000	357,000	445,000	766,000	589,000	622,000	570,000	766,000	936,000	432,000	242,000	6,847,000
Average gpd	17,258	20,964	11,516	14,833	24,710	19,633	20,065	18,387	25,533	30,194	14,400	7,806	18,759
Monthly Average gpd range	7,806-30,194												
Annual Average gpd	18,759												

Units	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Annual 2015
325851													
Acre Feet	1.445	1.847	1.587	1.185	0.644	0.945	1.086	0.865	2.983	2.940	0.927	0.99	17.44
Gallons	471,000	602,000	517,000	386,000	210,000	308,000	354,000	282,000	972,000	958,000	302,000	322,000	5,684,000
Average gpd	15,194	21,500	16,677	12,867	6,774	10,267	11,419	9,097	32,400	30,903	10,067	10,387	15,573
Monthly Average gpd range	6,774-32,400												
Annual Average gpd	15,573												

Units	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Annual 2016
325851													
Acre Feet	1.191	1.571	0.706	0.463	0.847	2.679	2.400	3.931	2.317	1.452	0.826	0.83	19.21
Gallons	388,000	512,000	230,000	151,000	276,000	873,000	782,000	1,281,000	755,000	473,000	269,000	270,000	6,260,000
Average gpd	12,516	18,286	7,419	5,033	8,903	29,100	25,226	41,323	25,167	15,258	8,967	8,710	17,151
Monthly Average gpd range	5,033-41,323												
Annual Average gpd	17,151												

Units	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Annual 2017
325851													
Acre Feet	0.635	1.412	1.516	0.424	0.927	1.320	1.611	1.547	1.915	1.166	0.583	0.503	13.56
Gallons	207,000	460,000	494,000	138,000	302,000	430,000	525,000	504,000	624,000	380,000	190,000	164,000	4,418,000
Average gpd	6,677	16,429	15,935	4,600	9,742	14,333	16,935	16,258	20,800	12,258	6,333	5,290	12,104
Monthly Average gpd range	4,600-20,800												
Annual Average gpd	12,104												

Yearly Range 6.00 - 37.91 acre feet

Yearly Average 19.21 acre feet

Units	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Annual 2018
325851													
Acre Feet	0.967	0.847	1.108	0.663	0.555	1.157	1.320	3.241	0.537	0.101	1.093	0.715	12.30
Gallons	315,000	276,000	361,000	216,000	181,000	377,000	430,000	1,056,000	175,000	33,000	356,000	233,000	4,009,000
Average gpd	10,161	9,857	11,645	7,200	5,839	12,567	13,871	34,065	5,833	1,065	11,867	7,516	10,984
Monthly Average gpd range	1,065-34,065												
Annual Average gpd	10,984												
Yearly Range	6.00 - 37.91 acre feet												
Yearly Average	18.34 acre feet												

Exhibit SOIL&WATER-12

2018 Wastewater Generation and Management

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

Document No.

2. Page 1 of 1

CAR020007688

42612

3. Shipper's Name and Mailing Address
 Orange Grove Energy L.P.
 35435 Pala Del Norte Rd
 PALA CA 92059-2302

4. Shipper's Phone (760-515-2010

5. Transporter 1 Company Name

6. US EPA ID Number

A. Transporter's Phone

SAFETY-KLEEN SYSTEMS INC

TXP000001205

972-265-2020

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

PATRIOT ENVIRONMENTAL SERVICES

CAD053866794

562-321-6462

9. Designated Facility Name and Site Address

10. US EPA ID Number

C. Facility's Phone

CR0039
 CROSBY & OVERTON, INC
 1630 W. 17TH ST.
 LONG BEACH CA 90813

CAD028409019

562-432-5445

11. Shipping Name and Description

12. Containers
 No. Type

13. Total Quantity

14. Unit Wt/Vol

HM
 a. NON-REGULATED LIQUID (VAC-OIL, WATER, SLUDGE) (NOT USDOT/NOT USEPA REGULATED) (NOT CA REGULATED)

001

TT

800

6

SHIPPER

THE REFERENCED WASTE WAS RECEIVED AND TREATED TO STANDARDS MANDATED BY THE FEDERAL CLEAN WATER ACT AND EFFLUENT REQUIREMENTS SET FORTH BY THE LOS ANGELES CO SANITATION DISTRICTS. WASTE TREATMENT IS PERFORMED UNDER PERMITS GRANTED TO CROSBY OVERTON, INC. BY THE DEPARTMENT OF TOXIC SUBSTANCE CONTROL TOGETHER WITH ENVIRONMENTAL PROTECTION AGENCY IN ACCORDANCE WITH THE PROVISIONS OF THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976 TOGETHER WITH APPLICABLE FEDERAL AND STATE REGULATIONS. CROSBY & OVERTON HAS ALL OF THE NECESSARY PERMITS TO ACCEPT REFERENCED WASTE AND ALL THE WASTE HAS BEEN HANDLED IN ACCORDANCE WITH RCRA SECTION 65, SUCH THAT THE CERTIFICATE HOLDER'S LIABILITY HAS BEEN TERMINATED

15. Special Handling Instruction and Additional Information

24 HR EMERGENCY #1-800-468-1760 (SK / TFI)
 AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY
 SK PROFILE 104523

224492909
 SK SHIP# 224492909

OR14694

DOT/PREF A. 3299/156097 B. C. D.
 A) NONE B) C) D)

Patriot PO # 0000335059

Crosby PO # 0000335065

H135

D153580

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION:

*This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name

Signature required here if US DOT regulated

Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if material is not DOT regulated

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

24 HR EMERGENCY # 800-468-1760 (SAFETY-KLEEN)

ORIGINAL-RETURN TO GENERATOR

FORM NO. 01-90291 (03/2015)

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

Document No.

2. Page 1 of 1

OR020207688

42611

3. Shipper's Name and Mailing Address
 Orange Grove Energy L.P.
 35435 Pala Del Norte Rd
 PALA CA 92059-2302

4. Shipper's Phone (760-615-2010

5. Transporter 1 Company Name

6. US EPA ID Number

A. Transporter's Phone

SAFETY-KLEEN SYSTEMS INC

TX0000001205

972-265-2000

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

PATRIOT ENVIRONMENTAL SERVICES

CA0053066704

562-321-6462

9. Designated Facility Name and Site Address

10. US EPA ID Number

C. Facility's Phone

CR0039
 CROSBY & OVERTON, INC
 1630 W. 17TH ST.
 LONG BEACH CA 90813

CA0028409019

562-432-5445

11. Shipping Name and Description

12. Containers

13. Total Quantity

14. Unit Wt/Vol

HM

No.

Type

a. NON-REGULATED LIQUID (VAC-OIL, WATER, SLUDGE) (NOT USDOT/NOT USEPA REGULATED) (NOT CA REGULATED)

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1500

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b.

c.

d.

THE REFERENCED WASTE WAS RECEIVED AND TREATED TO STANDARDS MANDATED BY THE FEDERAL CLEAN WATER ACT AND EFFLUENT REQUIREMENTS SET FORTH BY THE LOS ANGELES COUNTY SANITATION DISTRICTS. WASTE TREATMENT IS PERFORMED UNDER PERMITS GRANTED TO CROSBY & OVERTON, INC. BY THE DEPARTMENT OF TOXIC SUBSTANCE CONTROL TOGETHER WITH THE ENVIRONMENTAL PROTECTION AGENCY IN ACCORDANCE WITH THE PROVISIONS OF THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976 TOGETHER WITH APPLICABLE FEDERAL AND STATE REGULATIONS. CROSBY & OVERTON HAS ALL OF THE NECESSARY PERMITS TO ACCEPT THE REFERENCED WASTE AND ALL THE WASTE HAS BEEN HANDLED IN ACCORDANCE WITH RCRA AND RCRA REGULATIONS. SUCH THAT THE CERTIFICATE HOLDER'S LIABILITY HAS BEEN TERMINATED.

15. Special Handling Instruction and Additional Information

24 HR EMERGENCY #1-800-468-1760 (SK / TFI)
 AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY
 SK PROFILE 104523
 DOT/PRFL A. 3299/156097 B. C. D.
 A) NONE B) C) D)
 Patriot PO 0000360142
 Crosby PO 0000360131
 D159032

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION:

*This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name

Signature required here if US DOT regulated

Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if material is not DOT regulated

Month Day Year

Anthony Moretto

Signature

15/29/18

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

John Turner

Signature

15/29/18

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Arturo Esquivel

Signature

15/29/18

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

Signature

Signature

15/30/18

24 HR EMERGENCY # 800-468-1760 (SAFETY-KLEEN)

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

Document No.

2. Page 1 of 1

CA0000207688

04158

3. Shipper's Name and Mailing Address
 Orange Grove Energy L.P.
 35435 Pala Del Norte Rd
 PALA CA 92059-2302

4. Shipper's Phone (760-7615-2010

5. Transporter 1 Company Name

6. US EPA ID Number

A. Transporter's Phone

SAFETY-KLEEN SYSTEMS INC

TYR0000781205

972-265-2000

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

PATRIOT ENVIRONMENTAL SERVICES

CAD053866794

562-321-6462

9. Designated Facility Name and Site Address

10. US EPA ID Number

C. Facility's Phone

CR0039
 CROSBY & OVERTON, INC
 1630 W. 17TH ST.
 LONG BEACH CA 90813

CAD028409019

562-432-5445

11. Shipping Name and Description

12. Containers

13. Total Quantity

14. Unit Wt/Vol

HM

No.

Type

Quantity

Unit Wt/Vol

a. NON-REGULATED LIQUID (VAC-OIL, WATER, SLUDGE) (NOT USDOT/NOT USEPA REGULATED) (NOT CA REGULATED)

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G

15. Special Handling Instruction and Additional Information

SK SHIP# 226197610

OR14694

24 HR EMERGENCY #1-800-468-1760 (CH / SK / TFI)
 AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY
 SK PROFILE 104523

Patriot PO 0000371105

DOT/PRFL A. 3299/156097 B. C. D.
 A) NONE B) C) D)

Crosby PO 0000371116

01618605
 L47505

H35

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION:

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Printed/Typed Name

Signature required here if US DOT regulated

Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if material is not DOT regulated

Month Day Year

PAUL BRAEMER

Paul Braemer

8/10/18

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

John Turner

[Signature]

8/10/18

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Roberto Quintana

[Signature]

8/13/18

19. Discrepancy Indication Space

WASTE WAS RECEIVED AND TREATED TO STANDARDS MANDATED BY THE FEDERAL ACT AND EFFLUENT REQUIREMENTS SET FORTH BY THE LOS ANGELES COUNTY SANITATION DISTRICTS. WASTE TREATMENT IS PERFORMED UNDER PERMITS GRANTED TO CROSBY & OVERTON, INC BY THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCE CONTROL, TOGETHER WITH THE CALIFORNIA AND FEDERAL ACT OF 1976 TOGETHER WITH THE PROVISIONS OF THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976 TOGETHER WITH APPLICABLE FEDERAL AND STATE REGULATIONS. SUCH THAT THE CERTIFICATE HOLDER'S LIABILITY HAS BEEN TERMINATED.

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in item 19.

Printed/Typed Name

Signature

Month Day Year

Joaqueline Fregoso

[Signature]

8/14/18

24 HR EMERGENCY # 800-468-1760 (SAFETY-KLEEN)

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

Document No.

2. Page 1 of 1

CA0000207688

0.4157

3. Shipper's Name and Mailing Address
 Orange Grove Energy L.P.
 35435 Pala Del Norte Rd
 PALA CA 92059-2302

4. Shipper's Phone (760-615-2010

5. Transporter 1 Company Name

6. US EPA ID Number

A. Transporter's Phone

SAFETY-KLEEN SYSTEMS INC.

TXR0000081205

972-265-2000

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

PATRIOT ENVIRONMENTAL SERVICES

CAD053866794

562-321-6462

9. Designated Facility Name and Site Address

10. US EPA ID Number

C. Facility's Phone

CR0039
 CROSBY & OVERTON, INC
 1630 W. 17TH ST.
 LONG BEACH CA 90813

CAD028409019

562-432-5445

11. Shipping Name and Description

12. Containers

13. Total Quantity

14. Unit Wt/Vol

HM

No.

Type

a. NON-REGULATED LIQUID (VAC-OIL, WATER, SLUDGE) (NOT USDOT/NOT USEPA REGULATED) (NOT CA REGULATED)

001

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1200

G

THE REFERENCED WASTE WAS RECEIVED AND TREATED TO STANDARDS MANDATED BY THE FEDERAL CLEAN WATER ACT AND EFFLUENT REQUIREMENTS SET FORTH BY THE LOS ANGELES COUNTY SANITATION DISTRICTS. WASTE TREATMENT IS PERFORMED UNDER PERMITS GRANTED TO CROSBY OVERTON, INC. BY THE DEPARTMENT OF TOXIC SUBSTANCE CONTROL TOGETHER WITH THE ENVIRONMENTAL PROTECTION AGENCY IN ACCORDANCE WITH THE PROVISIONS OF THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976 TOGETHER WITH APPLICABLE FEDERAL AND STATE REGULATIONS. CROSBY & OVERTON HAS ALL OF THE NECESSARY PERMITS TO ACCEPT THE REFERENCED WASTE AND ALL THE WASTE HAS BEEN HANDLED IN ACCORDANCE WITH RCRA PROPOSITION 65, SUCH THAT THE CERTIFICATE HOLDER'S LIABILITY HAS BEEN TERMINATED

15. Special Handling Instruction and Additional Information

22004072
 SK SHIP# 22004157 ORI14694
 24 HR EMERGENCY #1-800-468-1760 (CH 7 SK 7 TFI)
 AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY
 SK PROFILE 104523

DOT/PRFL A. 3299/156097 B. C. D.
 A) NONE B) C) D)

Patriot P.O - 0000380480
 Crosby P.O - 0000380400

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION:

*This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name

Signature required here if US DOT regulated

Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if material is not DOT regulated

Month Day Year

AL DELUNA

[Signature]

10 | 2 | 18

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

John Terry

[Signature]

10 | 2 | 18

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

JOSE A GARCIA

JOSE A GARCIA

10 | 03 | 18

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

[Signature]

[Signature]

10 | 4 | 18

24 HR EMERGENCY # 800-468-1760 (SAFETY-KLEEN)

Exhibit WASTE-7

Waste Management Summary

Table 1 – Details of Operations and Maintenance Waste Streams and Management Methods

WASTE CLASSIFICATION	WASTE STREAM DESCRIPTION	QUANTITY GENERATED ⁽¹⁾	FREQUENCY OF GENERATION	WASTE MANAGEMENT METHODS		
				ONSITE	TRANSPORT	DESTINATION
Non-hazardous solids	Paper products, cardboard, plastic, packaging materials, glass, and other household-type recyclables	0.5 ton/year	Continuous	Best management practices with collection and storage in bins for weekly pickup	Commercial refuse hauling truck	Recycled at licensed recycling facility
	Mixed trash municipal solid waste (e.g., household-type waste)	0.5 ton/year	Continuous	Best management practices with collection and storage in bins for weekly pickup	Commercial refuse hauling truck	Licensed Transfer/Materials Recovery Facility and/or Class III Landfill
	CTG used air filters	300 filters (0.3 ton) per event	One change-out event approx. every 3 years	Best management practices with collection and storage in roll-off dumpster. Pickup from the site to be ordered upon completion of change-out event.	Commercial truck	Class III landfill
	Used RO membranes	400 lbs	Semi-annual	Best management practices with collection and storage in bins for weekly pickup	Commercial refuse hauling truck	Licensed Transfer/Materials Recovery Facility and/or Class III Landfill
Non-hazardous Liquids	Septic system pump-out	750 cu. ft 2,000 gallons per event	One pump-out approx. every 5 years	No onsite management. Transport truck will load directly during septic tank pump out.	Commercial pump-out truck	Licensed waste treatment facility
	Offline turbine wash water and plant drain water	300 gallons/month	Intermittent	Typically no onsite handling. Water drains to onsite wastewater storage tank where it is contained for pickup quarterly or as otherwise needed.	Commercial pump-out truck	Licensed non-hazardous wastewater treatment facility
	CTG internal component wash water including detergent.	Approx. 200 gallons/month	Intermittent	Typically no onsite handling. Water drains to onsite wastewater storage tank where it is contained for pickup quarterly or as otherwise needed.	Commercial pump-out truck	Licensed non-hazardous wastewater treatment facility
	RO Feed Tank and Permeate Tank Rinse Water	3,000 gallons/year	Annually	Typically no onsite handling. Contractor brings potable water onsite for washing algae from tanks. Algae laden water is pumped into a truck and hauled offsite.	Commercial pump-out truck	Licensed non-hazardous wastewater treatment facility
	Fuel gas system oily water containing small amounts of natural gas condensate and compressor oil blow-by.	30 gallons/month	Intermittent	Typically no onsite handling. Contractor brings potable water onsite for washing algae from tanks. Algae laden water is pumped into a truck and hauled offsite.	Commercial pump-out truck	Licensed non-hazardous wastewater treatment facility
Hazardous solids	Waste paint, empty hazardous containers, waste petroleum-contaminated solids	1.5 tons/year	Periodic	Handle, store and manage in accordance with California Code of Regulations Title 22 Division 4.5.	Collection by commercial truck on “milk run.”	Licensed treatment facility
	Universal waste batteries, lamps, electronic devices and aerosol cans	0.5 ton/year	Continuous	Handle, store and manage in accordance with California Code of Regulations Title 22 Division 4.5.	Shipped in Waste Management Lamtracker boxes or picked up by Waste Management Lamtracker	Licensed recycling facility
	Used fuel gas system coalescer filters	0.4 ton/year	Semi-annually	Handle, store and manage in accordance with California Code of Regulations Title 22 Division 4.5.	Collection by commercial truck on “milk run.”	Licensed recycling facility
	Spent lead acid batteries used in reciprocating engine starting systems, plant uninterruptible control power systems	30 batteries	Approx. 30 batteries every 7-10 years, plus an occasional failed battery	Handle, store and manage in accordance with California Code of Regulations Title 22 Division 4.5.	Collection by commercial truck on “milk run” or other contracted arrangements when bulk change-outs occur.	Licensed recycling facility
	Used oil filters from CTGs, reciprocating engines (diesel fire pump and black start generator), and fuel gas compressors. Paper, metal, hydrocarbons.	0.8 ton/year	Approx. quarterly	Handle, store and manage in accordance with California Code of Regulations Title 22 Division 4.5.	Collection by commercial truck on “milk run.”	Licensed recycling facility
	Depleted CO oxidation catalyst.	3 tons/event ⁽³⁾	Once every 5-7 years	Palletized, shrink-wrapped and labeled for transport to offsite recycling / salvage facility.	Commercial truck	Licensed recycling facility Non-recyclable components to a licensed RCRA Subtitle D landfill or Class III landfill.
	Depleted SCR catalyst.	30 tons/event ⁽³⁾	Once every 5-7 years	Palletized, shrink-wrapped and labeled for transport to offsite recycling / salvage facility.	Commercial truck	Licensed recycling facility Non-recyclable components to a licensed RCRA Subtitle D landfill or Class III landfill.
Hazardous liquids	Used crankcase oil	200 gallons/year	Semi-annually	Handle, store and manage in accordance with California Code of Regulations Title 22 Division 4.5.	Collection by commercial truck on “milk run.”	Licensed used oil recycling facility
	Used Antifreeze	125 pounds/year	Annually	Handle, store and manage in accordance with California Code of Regulations Title 22 Division 4.5.	Commercial pump-out truck	Licensed recycling facility

(1) Generation rates are estimated and will vary over time.

(2) Returned to vendor for regeneration.

(3) Quantity does not include steel module components that are salvaged. Steel from spent modules is recovered by an out-of-state salvage company for recycling. Materials not recovered for recycling are disposed of in a licensed RCRA Subtitle D landfill.

Table 2 –Waste Stream Management Transporters and Facilities

WASTE CLASSIFICATION	WASTE STREAM DESCRIPTION	TRANSPORTERS ⁽¹⁾	DESTINATION FACILITIES ⁽¹⁾
Non-hazardous solids	Paper products, cardboard, plastic, packaging materials, glass, and other household-type recyclables	Waste Management 5960 El Camino Real Carlsbad, CA 92008	Recycled at licensed recycling facility. OGE will not normally dictate destination facility to transporter for this waste stream.
	Mixed trash municipal solid waste (e.g., household-type waste)	Waste Management 5960 El Camino Real Carlsbad, CA 92008	Licensed Class III landfill. OGE will not normally dictate destination facility to transporter for this waste stream.
	CTG used air filters	Waste Management 5960 El Camino Real Carlsbad, CA 92008	Licensed Class III landfill. OGE will not normally dictate destination facility to transporter for this waste stream.
	Used RO Membranes	Current RO Vendor	Not Applicable (Reused)
	Colling Tower Sludge	Waste Management 5960 El Camino Real Carlsbad, CA 92008	Licensed Class III landfill. OGE will not normally dictate destination facility to transporter for this waste stream
Non-hazardous Liquids	Used RO Pre-Filters	Waste Management 5960 El Camino Real Carlsbad, CA 92008	Licensed Class III landfill. OGE will not normally dictate destination facility to transporter for this waste stream.
	Septic system pump-out	Licensed contractor to be determined for each event.	Licensed contractor to be determined for each event. OGE will not normally dictate destination facility to contractor for this waste stream.
	Offline turbine wash water and plant drain water	Safety Kleen Systems, Inc. El Cajon, CA	K-Pure Waterworks, Inc. Rancho Cucamonga, CA
	CTG internal component wash water including detergent.	Safety Kleen Systems, Inc. El Cajon, CA	K-Pure Waterworks, Inc. Rancho Cucamonga, CA
	RO Feed Tank and Permeate Tank Rinse Water	NRC Environmental 2950 Kurtz St San Diego, CA 92110	Klean Waters, Inc. Orange, Ca Ridgeline Energy Services, Inc. Santa Fe Springs, CA
Hazardous solids	Fuel gas system oily water containing small amounts of natural gas condensate and compressor oil blow-by.	Safety Kleen Systems, Inc. El Cajon, CA	Safety Kleen of California Carson, CA

WASTE CLASSIFICATION	WASTE STREAM DESCRIPTION	TRANSPORTERS ⁽¹⁾	DESTINATION FACILITIES ⁽¹⁾
	Waste paint, empty hazardous containers, waste petroleum-contaminated solids	Safety Kleen Systems, Inc. El Cajon, CA	Clean Harbors Grassy Mountain, LLC Aragonite, UT Clean Harbors Buttonwillow, LLC\ Buttonwillow, CA Safety Kleen Systems, Inc. El Monte, CA
	Universal waste batteries, lamps, electronic devices and aerosol cans	Shipped in Waste Management Lampracker boxes or picked up by Waste Management Lampracker	Recycled at licensed recycling facility. OGE will not normally dictate destination facility to transporter for this waste stream.
	Used fuel gas system coalescer filters	Safety Kleen Systems, Inc. El Cajon, CA	Clean Harbors Grassy Mountain, LLC Aragonite, UT
	Spent lead acid batteries used in engine starting systems, plant uninterruptible control power systems ⁽²⁾	Drycreek Enterprises 4842 Burr Street Bakersfield, CA 93308 Advanced Chemical Transport, Inc. 2010 West Mission Road Escondido, CA Safety Kleen Systems, Inc. El Cajon, CA. Eaton Corporation City of Industry, CA	Recycled at licensed recycling facility. OGE will not normally dictate destination facility to transporter for this waste stream.
	Used oil filters from CTGs, reciprocating engines (diesel fire pump and black start generator), and fuel gas compressors. Paper, metal, hydrocarbons.	Safety Kleen Systems, Inc. El Cajon, CA	United Oil Filters, Inc, Gardena, CA Thermo Fluids Inc. Phoenix, AZ
	Depleted CO oxidation catalyst. Metal and heavy metals, including platinum group	Licensed contractor to be contracted for each event (5-7 year intervals).	Licensed contractor to be contracted for each event (5-7 year intervals).

WASTE CLASSIFICATION	WASTE STREAM DESCRIPTION	TRANSPORTERS ⁽¹⁾	DESTINATION FACILITIES ⁽¹⁾
Hazardous liquids	Depleted SCR catalyst. Metal and heavy metals, including vanadium	Licensed contractor to be contracted for each event (5-7 year intervals).	Licensed contractor to be contracted for each event (5-7 year intervals).
	Used crankcase oil	Safety Kleen Systems, Inc. El Cajon, CA NRC Environmental Services	Safety Kleen Carson, CA Clean Harbors Wilmington, CA Demunno/Kerndoon Compton, CA Crosby & Oberton Long Beach, CA
	Parts Washer	Safety Kleen Systems, Inc. El Cajon, CA	Safety Kleen Systems, Inc. Santa Ana, CA
	Used Antifreeze	Safety Kleen Systems, Inc. El Cajon, CA	Clean Harbors San Jose, CA

⁽¹⁾ Based on operating experience. Other licensed transporters or destination facilities may be used as operations proceed.

⁽²⁾ Small sealed lead acid batteries and other non-automotive type lead acid batteries are managed as universal waste or recyclable materials under 22 CCR Division 4.5 regulations. Automotive type lead acid batteries are managed as recyclable materials under 22 CCR Division 4.5 regulations.

Appendix B

2018 Filings Submitted to / Permits Issued by Other Governmental Agencies

Appendix B

2018 Filings Submitted to / Permits Issued by Other Governmental Agencies

Document Type	From	To	Date	Document
Letter/Report	R. Garcia (OGE)	SDAPCD	1/15/18	4Q 2017 Rule 19_Continuous Emission Monitoring Report for Orange Grove Energy, L.P.
Letter/Report	P. Peterson (OGE)	RWQCB	2/20/18	2017 Annual Report to RWQCB for Recycled Water Use
Letter/Report	R. Garcia (OGE)	SDAPCD	4/24/18	1Q 2018 Rule 19_Continuous Emission Monitoring Report for Orange Grove Energy, L.P.
Letter / Report	R. Garcia (OGE)	SDAPCD	7/20/18	2Q 2018 Rule 19_Continuous Emission Monitoring Report for Orange Grove Energy, L.P.
Letter/Report	R. Garcia (OGE)	SDAPCD	10/21/18	3Q 2018 Rule 19_Continuous Emission Monitoring Report for Orange Grove Energy, L.P.
Letter/Report	P. Peterson (J-Power)	SDAPCD and EPA	8/27/18	Title V Semiannual Monitoring and Recordkeeping Summary Report for January - June 2018
Letter/Report	P. Peterson (J-Power)	SDAPCD and EPA	2/20/18	Title V Semiannual Monitoring and Recordkeeping Summary Report for July-December 2017 and Compliance Certification for 2017
Letter/Report	P. Peterson (J-Power)	SDAPCD and EPA	1/22/18	2017 Jul-Dec Compliance Certification for Emergency Fire Water Pump-ZZZZ Report
Letter/Report	P. Peterson (J-Power)	SDAPCD and EPA	7/12/18	2018 Jan-Jun Compliance Certification for Emergency Fire Water Pump- ZZZZ Report
Letter/Report	P. Peterson (J-Power)	SDAPCD and EPA	1/22/18	2017 Jul-Dec Excess Emission and Monitoring System Performance_KKKK Report
Letter/Report	P. Peterson (J-Power)	SDAPCD and EPA	7/20/18	2018 Jan-Jun Excess Emission and Monitoring System Performance_KKKK Report
Permit	SDAPCD	OGE	2/21/18	Startup Authorization (APCD2016-APP-004406) and SA EXTENSION for Unit 1 and Unit 2

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2018 Filings Submitted to / Permits Issued by Other Governmental Agencies

Document Type	From	To	Date	Document
Permit	SDAPCD	OGE	8/22/18	Permits to Operate (PTOs) for the Fire Water Pump and Black Start Generator.
Letter/Report	R. Garcia	SDAPCD /EPA	4/24/18	Protocol for Emissions Compliance and CEMS recertification testing
Report	R. Garcia	SDAPCD	6/29/18	RATA and Emissions Compliance Test Report (2018)
Application	R. Garcia	EPA/SDAPCD	7/13/18	Application for Recertification of CEMS for Unit 1(CTG1) and Unit 2 (CTG2)
Report	R. Garcia (OGE)	EPA	3/28/18	Online GHG e-GRRT Report
Report	R. Garcia (OGE)	CARB	4/4/18	Online GHG Cal e-GRRT Report
Report	R. Garcia (OGE)	CARB	2/8/18	Online RMP 2016 Annual Report and Fee Payment
Report	R. Garcia (OGE)	CARB	5/30/18	Online SF6 Annual Report
Report	R. Garcia (OGE)	EPA	1/9/18	Online 4Q 2017 EDR Report
Report	R. Garcia (OGE)	EPA	10/12/18	REVISED Online 4Q 2017 EDR Report
Report	R. Garcia (OGE)	EPA	4/17/18	Online 1Q 2018 EDR Report
Report	R. Garcia (OGE)	EPA	7/18/18	Online 2Q 2018 EDR Report
Report	R. Garcia (OGE)	EPA	10/12/18	Online 3Q 2018 EDR Report
Report / Certification	R. Garcia (OGE)	CERS*	10/31/18	Annual Hazardous Materials Business Plan Certification
Report / Certification	R. Garcia (OGE)	CERS*	1/29/19	REVISED Annual Hazardous Materials Business Plan Certification
Permit	San Diego County / CUPA	OGE	2/15/18	Unified Program Facility Permit

* California Environmental Reporting System (CERS)

Appendix C

2018 CEC Submittal Log

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2018 CEC Submittal Log

LOG NUMBER	DATE	DESCRIPTION
2018-1	January 15, 2018	Copy of APCD Rule 19.2 4Q 2017 Report
2018-2	January 22, 2018	AQ-FP17 – 2017 Jul-Dec Compliance Certification for Emergency Fire Water Pump_ZZZZ Report
2018-3	January 22, 2018	AQ-16 - 2017 Jul-Dec Excess Emission and Monitoring System Performance_KKKK Report
2018-4	January 22, 2018	Condition of Certification AQ-SC11 - Quarterly Operation Report, Fourth Quarter 2017 APCD Rule 19.2_ 4Q 2017Report
2018-5	February 20, 2018	2017 Annual Recycled Water Use Report (Soil & Water-8)
2018-6	February 20, 2018	2017 Title Jul-Dec Semiannual and Annual Certification Report
2018-7	February 21, 2018	Copies of Start Up Authorization (SA) and SA extension issued by the APCD after completion of the SCR COC Project in 2016.
2018-8	February 26, 2018	2017 CEC Annual Report – Compliance -7
2018-9	April 9, 2018	Copy of Notification of planned date for CEMS recertification testing
2018-10	April 24, 2018	Condition of Certification AQ-SC11 - Quarterly Operation Report, First Quarter 2018 APCD Rule 19.2_ 1Q 2018 Report
2018-11	April 24, 2018	Protocol for Emissions Compliance and CEMS recertification testing
2018-12	June 6, 2018	Compliance-7 2018 Compliance Fee
2018-12a	June 29, 2018	2018 Emissions Compliance and CEMS recertification / RATA Testing Report
2018-13	July 12, 2017	AQ-FP17 - 2018 Jan-Jun Compliance Certification for Emergency Fire Water Pump_ZZZZ Report
2018-14	July 13, 2018	CEMS RE-Certification Application
2018-15	July 20, 2018	AQ-16 - 2018 Jan-Jun Excess Emission and Monitoring System Performance_KKKK Report
2018-16	July 20, 2017	APCD Rule 19.2_ 2Q 2018 Report

Appendix C

2018 CEC Submittal Log

LOG NUMBER	DATE	DESCRIPTION
2018-17	July 24, 2018	Condition of Certification AQ-SC11 - Quarterly Operation Report, Second Quarter 2018 APCD Rule 19.2_ 2Q 2018 Report
2018-18	August 27, 2018	Title V 1 st Semiannual Compliance Report
2018-19	October 21, 2018	Copy of APCD Rule 19.2_ 3Q 2018 Report
2018-20	October 30, 2018	Condition of Certification AQ-SC11 - Quarterly Operation Report, Third Quarter 2018
2018-21	November 1, 2018	Demin Tank Water Overflow Incident
2018-22	November 15, 2018	Response to Request for Information after site inspection conducted on October 23, 2018
2018-23	December 4, 2018	Request to Change Address for Future Compliance Correspondence