

DOCKETED

Docket Number:	84-AFC-04C
Project Title:	Compliance - Application for Certification for the Gilroy Foods Cogeneration Project
TN #:	231112
Document Title:	Gilroy Cogeneration Project - 2018 Annual Compliance Report
Description:	2018 Annual Compliance Report for the Gilroy Cogeneration Project.
Filer:	Mary Dyas
Organization:	Calpine Gilroy Cogen, LP
Submitter Role:	Applicant
Submission Date:	12/11/2019 7:26:45 AM
Docketed Date:	12/11/2019

March 15, 2019

Ms. Mary Dyas (84-AFC-4C)
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814-5704

**Re: CALPINE GILROY COGEN, L.P. (84-AFC-4C)
Annual Compliance Report - 2018**

Dear Ms. Dyas:


In accordance with the Conditions of Certification for the Calpine Gilroy Cogen L.P., this report is intended to fulfill the requirements of the Annual Compliance Report for 2018 for Needs Conditions of Certification 3.

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

- Compliance Matrix
- AQ-1-3: CO Data for Facility
- Public Health 2-2: Worker Health and Safety Program
- Socio, Land Use, VIS 3-2: Oversize/Overweight Permits
- Socio, Land Use, VIS 3-3: Cal-Trans Permits
- BIO 5.-3: BRIMP Plan
- Water Quality 6-6: Groundwater Analysis
- Water Quality 6-7: SPCC Plan Updates
- Water Quality 6-10: Recycled Water Usage
- Waste Management 11-6: Waste Haulers
- Waste Management 11-8: Hazardous Waste Permit
- Waste Management 11-9: Hazardous Waste Disposal
- Waste Management 11-10: Hazardous Waste Generation
- Safety 12-15: Fire Protection Program
- Power Plant Reliability 15-2: Plant Availability and Capacity
- Power Plant Reliability 15-4: Generation to PG&E
- Power Plant Reliability 15-4: Annual Report – Operations Summary

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

Sincerely,



Kevin Karwick
General Manager
Gilroy Cogen L.P

Enclosures: Via Email

CALPINE GILROY COGEN, L.P.
SUMMARY OF CONDITIONS OF COMPLIANCE
2018 Annual Report

CFC 01-03

- Total facility CO Emissions for 2018 were 8.7 tons out of a 100-ton limit (See Appendix 1).
- The annual source test report was submitted to BAAQMD, CEC and EPA Region IX, under separate cover.

CFC 01-20

The facility is in compliance with Title V permit requirements and BAAQMD regulations for the reporting period.

CFC 01-21

There have been no major changes in the Air Emissions Control Systems during the reporting period.

CFC 01-SC5

The auxiliary boiler ammonia performance testing was completed successfully by Montrose Air Quality Services on June 8-9, 2017. The report was submitted under separate cover.

CFC 01-SC6

The auxiliary boiler S101 and S102 combined hours of operation remained below the 15,800 hours combined limit. In 2018, the boilers operated 11,097 hours combined.

CFC 02-02

The worker Health and Safety program is continuing as implemented.

CFC 03-02

The facility did not obtain any oversize/overweight load permit during the reporting period.

CFC 05-03

There are currently no BRMIP studies in progress during the reporting period.

CFC 06-06

Waste water from the facility is sent to OLAM for processing and discharging. OLAM performs monitoring and submits periodic reports to the California Regional Water Quality Control Board. No violations were noted during the reporting period.

CFC 06-07

There were no significant changes to the SPCC plan during the reporting period.

CFC 06-10

See Appendix 2.

CFC 11-06

There were no waste enforcement actions during the reporting period.

CALPINE GILROY COGEN, L.P.
SUMMARY OF CONDITIONS OF COMPLIANCE
2018 Annual Report

- CFC 11-08**
The facility did not apply for a Hazardous Waste Facility Permit during the reporting period.
- CFC 11-09**
The facility used only licensed hazardous waste haulers during the reporting period. See Appendix 3.
- CFC 11-10**
See Appendix 4 for details.
- CFC 12-15**
There have been no major changes to the facility's Fire Protection Program during the reporting period.
- CFC 12-16, 14-05**
There were no employee complaints or CAL/DOHS inspections during the reporting period
- CFC 12-19**
There have been no violations of hydrogen storage during the reporting period.
- CFC 15-02**
See Appendix 5
- CFC 15-04**
See Appendix 6
- CFC 15-05**
See Appendix 6

DATE: 3/15/2019 CALPINE GILROY COGEN - 84-AFC-4C
 2018 ANNUAL REPORT
 CONDITIONS OF CERTIFICATION

Completed = No action needed.
 Closed = Until action needed.
 Remarks = Most recent.
 GEC = Gilroy Energy Company
 CGC = Calpine Gilroy Cogen
 PCR = Periodic Compliance Report
 ** = Updated - Status Changed

CEC #	STATUS	CONDITION/VERIFICATION	ORIGINAL DATE REQD	DATE ISSUED	COPY TO	REMARKS
01-01	Compltd.	Monitor Turbine NOx emission limitation with CEMS after DLN is operational	05-01-88	04-06-11	CEC BAAQMD	Amendment Order No. 11-0406-03 Performance Testing was completed July 12, 2011 to certify gas turbine CEMS after DLN combustor upgrades.
01-02	Deleted	Submit HRSG drawings to BAAQMD 45 days prior to fabrication--CEC receives notification of drawings. Also to ARB.	04-11-86	04-06-11		Amendment Order No. 11-0406-03 Condition Deleted
01-03	Qtrly Annual	Submit Annual Source Test for CO Converter. BAAQMD Annual report showing compliance w/100 ton/yr limit.	Annual Quarterly		CEC CEC BAAQMD	PCR #31 9-30-93 Attmt.A Submitted under separate cover CO converter requirement replaced with 10 ppm CO limit
01-04	Compltd.	Monitor Aux Boiler NOX emissions per Condition 12, with CEMS.	05-01-88	07-15-88		Same as #01-01. PCR #11-Attmt.A Monthly Emissions Summaries REFER #01-15
01-05	Closed	Issue quarterly reports of fuel oil firing and fuel oil sulfur content.	04-01-88	04-6-11		Amendment Order No. 11-0406-03 Condition Deleted
01-06	Deleted	Same as above - #01-05 -REFER to #01-18		N/A		Same as above.
01-07	Deleted	Same as #01-05 and #01-09 -REFER TO #01-05		04-6-11		Amendment Order No. 11-0406-03 Condition Deleted
01-08	NA	Maintain steam injection records per #01-09. REFER TO #01-15.		N/A		Amendment Order No. 11-0406-03 Condition not applicable after DLN install
01-09	Quarterly	Upon request provide quarterly fuel reports to CEC, BAAQMD and ARB.	06-30-88	04-06-11		Quarterly Report
01-10	Compltd.	Monitor NOX emission limitation per #01-12. NOx 2,297 lbs/day & 398 tons/yr turbine and boilers combined	04-15-87	N/A	CEC BAAQMD	Ongoing
01-11	Deleted	Provide copies of fuel oil firing records upon request, REFER TO #01-05.		N/A		Amendment Order No. 11-0406-03 Condition 01-05 Deleted
01-12	Compltd.	Submit a continuous monitoring plan that complies with BAAQMD Manual of Procedure Vol 5. 120 days before startup.	04-15-87	08-07-87	CEC BAAQMD	PCR #6, 7-10-87, Att. I 9th Annual PCR #36 02-02-95 Att.A
01-13	Compltd.	a) Submit a detailed performance test plan for the air emission control system b) Notify of start-up c) Notify of start up by registered mail, a) 60 days b)7 days	05-15-87	12-31-87	CEC	PCR #6 7-10-87 PCR #7 10-15-87, Att. I 2nd Annl.PCR #8 12-31-87,Att 1-13

c) 3 days

01-14	Compltd.	Submit report identifying HRSG stack sampling arrangement 120 days before plant startup.	03-15-87	06-03-87	CEC BAAQMD	PCR #5 4-20-87, Att I
01-15	Quarterly	Upon request provide fuel consumption, CEMS logs and plant logs.	06-30-88	N/A	CEC BAAQMD	Quarterly Reports Monthly BAAQMD reports CEC Condition 01-09 Report
01-16	Deleted	Submit for approval any design changes involving a catalytic reduction system with an analysis of air quality.		04-06-11	BAAQMD	Amendment Order No. 11-0406-03 Condition 01-05 Deleted
01-17	Closed	Maintain logs of dehydrator fuel usage.		N/A	CEC BAAQMD	Log is established and being maintained by Gilroy Foods.
01-18	Closed	Fuel oil usage may not exceed 0.55% mil barrels per year. Submit quarterly fuel usage reports.	04-01-88	N/A	CEC BAAQMD	20th Annual PCR #53 02-14-2005 Title V permit (2006) requires only natural gas be fired
01-19	Quarterly	Aux Blrs shall not operate simultaneously with the gas turbine more than 28 boiler hrs/day or 3950 boiler hrs/yr. Submit quarterly reports.	04-01-88	N/A	CEC BAAQMD	Quarterly Reports
01-20	Quarterly	Summarize compliance of BAAQMD DOC conditions in periodic compliance reports.	10-06-86	N/A	CEC BAAQMD	Quarterly Reports BAAQMD TV Compliance Report
01-21	Compltd.	Submit for approval any proposed changes in Air Emission Control, Emission Monitoring System or Computer Control Syst. 120 days before implementation of the change.		N/A	CEC BAAQMD	Amendment Order No. 13-0410-4 ATC App #25027 for Plant # 11180 Auxiliary Boilers SCR Upgrades
01-22	Compltd.	Submit copy of PSD permit.	01-02-88	07-31-86	CEC BAAQMD	PCR #1 7-17-86
01-23	Compltd.	Obtain the approval of the BAAQMD if dust control measures other than water is proposed.				Water only was needed.
01-24	Closed	BAAQMD & CEC will meet to review the status of project compliance, upon request of either party.		12-31-87		Neither party requested review.
01-SC1	Compltd.	Until each SCR is installed, tuned and is operational but no later than 60 days from initial startup, ensure boilers meet 30 ppmvd at 3% O2 1-Hr average excluding startup and shutdown.		4-12-2011	CEC BAAQMD	28th Annual PCR #61 03-03-2014
01-SC2	Compltd.	Within 60 days of initial startup of each SCR unit, ensure the NOx emissions from each boiler do not exceed 5 ppmvd at 3% O2 1-Hr period		4-12-2011	CEC BAAQMD	28th Annual PCR #61 03-03-2014
01-SC3	Compltd.	Monitor NOx and CO from each boiler with a CEMS		4-12-2011	CEC BAAQMD	28th Annual PCR #61 03-03-2014
01-SC4	Compltd.	Within 60 days of initial startup of each SCR unit ensure ammonia concentration does not exceed 10 ppmvd		4-12-2011	CEC BAAQMD	28th Annual PCR #61 03-03-2014

01-SC5	Annual	Within 90 days of initial startup of each SCR unit conduct ammonia source test and annually thereafter		4-12-201:	CEC BAAQMD	Annual Source Test submitted separately.
01-SC6	Quarterly	Boilers shall not operate more than 15,800 hours combined on a 12 month rolling average		4-12-201:	CEC BAAQMD	Quarterly Reports
01-SC7	Quarterly	Maintain boiler records of hours of operation on a 12 month rolling average, fuel, duration of startup and shutdown including NOx and CO in a log		4-12-201:	CEC BAAQMD	Quarterly Reports
02-01	Compltd.	Request Cal-Osha Consultation Service or Cal Dosh to review the worker health and safety/accident prevention program for the project (also issued to Cal-Osha) 120 days prior to startup.	01-15-87	07-02-87	CEC	PCR #5 4-10-87 PCR #6 7-10-87 Att. 6
02-02	Annual	Submit copy of Cal/Osha or Cal/Dosh approval letter. Summary health & safety program in PCR 's.	Annual		CEC	Annual Compliance Report
02-03	Closed	Submit vegetation management program to SCC Dept.of Agric./& pesticide operator's registration number.		01-31-89	CEC	24th Annual PCR #57 02-15-2010 PCR #6 7-10-87 Att. 2 3rd Annual PCR 12 12-31-88 Att.A
02-04	Compltd.	Implement a cooling tower management plan for the control of Legionella		08-23-05	CEC	24th Annual PCR #57 02-15-2010
03-01	Compltd.	Submit letter from Gilroy School District verifying compliance w/School Impact Fee in 1st Annual Periodic Compli. Report.	01-01-87	12-19-86	CEC	1st Annual PCR #3 12-19-86
03-02	Compltd.	Note in Annual Compliance Report all oversize/overweight load permits obtained from Cal Trans/SCC.	01-01-87	12-19-86	CEC	1st Annual PCR #3 12-19-86 ***Nothing to report.
03-03	Compltd.	Note in Annual Compliance Report terms of permit for gas line under Hwy 152.	01-01-87	12-19-86	CEC	1st Annual PCR #3 12-19-86
03-04	Compltd.	Submit letter in first compliance report after project completion verifying plant painting & plantings.	04-01-88	6-30-88	CEC	3rd Annual PCR #12 12-31-88
03-05	Compltd.	Submit letter in first compliance report after project completion verifying color of transmission line towers.	04-01-88		CEC	PG&E towers are in compliance.
04-01	Compltd.	Submit plan for Llagas to Metcalf transmission line upgrade mitigation 90 days prior to start of construction.	07-01-86	07-07-86	CEC	PCR #1 7-17-86 Att. A
04-02	Compltd.	Submit name of cultural resources specialist 30 days prior to start of any dirt-work.	06-01-86	07-07-86	CEC	PCR #1 7-17-86
04-03	Compltd.	Submit name of Ohlone observer 30 days prior to start of dirtwork.	06-01-86	07-07-86	CEC	PCR#1 7-17-86
04-04	Compltd.	Submit archaeological mitigation measures and reports, maps, etc. to SHPO & NRAIC within 90 days.	06-01-86	09-02-86	CEC	PCR# 2 10-15-86 Att. K

04-05	Compltd.	City of Gilroy business license (we have to obtain this license before or with the first building permit submittal.	04-15-86	05-01-86		Submitted to City of Gilroy
04-05	Compltd.	Notify CEC within 24 hours of work stoppage due to archaeological finds.	As reqd.		CEC	No archaeological finds were found.
04-06	Compltd.	Inform the CEC of any actions regarding the Ohlone burial grounds.	As reqd.		CEC	No actions occurred.
04-07	Compltd.	Provide cultural monitor during excavation extending beyond the fill	05-29-07	06-28-07	CEC	22nd Annual PCR #55 02-11-2008 Cultural Monitoring Report submitted
05-01	Compltd.	GEC shall submit the Biological Resources Mitigation Implementation Plan (BRMIP) to CEC for site, gas line, and transmission line 30 days prior to start of site prep.	05-30-86	06-25-86	CEC	PCR #1 7-17-86, Att. B PCR #2 10-15-86, Att. B
05-02	Compltd.	Submit name of designated qualified biologist to CBO, CEC, CDFG prior to start of site prep.	06-30-86	08-08-86	CEC	PCR #1 7-17-86, Att. B Included with #5-02
05-03	Compltd.	Biologist to submit semiannual compliance report beginning 6 months after start of site prep until all measures have been successfully completed.	12-31-88		CEC	PCR #1 7-17-86, Att. B PCR #4 1-7-87, Att. I PCR #6 7-10-87, Att. 3 PCR #8 12-31-87, Att. 5-3 PCR #9 3-18-88, Cond. #5-3
05-04	Compltd.	Submit documentation verifying CEC & CDFG area access.	07-01-86	07-14-86	CEC	PCR #1 7-17-86, Att. B
06-01	Compltd.	Discuss water resources mitigation measures in first PCR.	07-01-86	07-17-86	CEC	PCR #1 7-17-86, Att. C
06-02	Compltd.	Submit drawings showing sanitary seal for new well 30 days prior to filling cooling tower basin.	06-01-86	05-14-87	CEC	2nd Annual CR #8 12-31-87, Att 6-2 Submit to Gilroy Dept. of Public Works.
06-03	Compltd.	Applicant shall provide status report of each measure per compliance report to CEC for items a) thru g).	07-01-86	07-17-86	CEC	
06-04	Compltd.	Applicant shall provide status report to CEC per compliance report measurs for items a,b,c,d, & e, item d is by Civil.	07-01-86	07-01-86	CEC	
06-05	Compltd.	Submit a) amended or new waste discharge rqmts from CCRWQCB b) City of Gilroy sewer permit and c) discharge permit from SCVWD accepting storewater discharges 30 days prior to commercial operation.	12-01-87	12-31-87	CEC	Copies previously submitted.
06-06	Annual	Monitor aquifers underlying wastewater disposal land and report.	01-31-88	01-29-88	CRWD CEC	Annual Compliance Report
06-07	Annual	File the Spill Containment & Contingency Plan with City of Gilroy P.W.D. and Fire Dept., CCRWQCB, SCVWD & CEC, 90 days prior	05-01-88	01-16-89	CEC	Annual Compliance Report

to operation. Review & update annually.

06-08	Compltd.	Applicant shall take all precautions proposed in AFC	10-01-86	07-17-86	CEC	PCR #1
06-09	Annual	Use tertiary treated water as primary supply. Well water as backup supply. Notify in writing if 30 day interruption	07-13-05	07-13-05	CEC	Annual Compliance Report Construction completed Oct-2007
06-10	Annual	Annual summary of recycled water usage.	07-13-05	07-13-05	CEC	Annual Compliance Report
07-01	Compltd.	In first compliance report GEC submit mitigation measures concerning stripping of surface soil and excavation.	10-01-86	07-17-86	CEC	PCR #1, Att. G
07-02	Compltd.	Submit pipeline drawings & maps 60 days prior to start of construction.	08-01-86	07-01-86	CEC	PCR #1 7-17-86 PCR #2 10-15-86, Att. C
07-03	Compltd.	Submit pipeline drawings & maps 60 days prior to start of construction.	08-01-86	07-01-86	CEC	PCR #1 7-17-86 PCR #5 4-10-15-86
07-04	Compltd.	Name & licenses or registration #'s of soil engineer to CEC/CBO 10 days prior to submittal of drawings.	04-08-86	04-25-86	CEC	Bechtel letter BLG-240 4-7-87 Bechtel letter GF06192 1-9-87
07-04	Compltd.	Submit soils engineering report & engineering geology report prior to start of construction.	06-01-86	05-06-86	CEC	Same as above.
07-05	Compltd.	GEC submit data, analysis, conclusions & recommendations on liquefaction hazard along transmission line & gas line 60 days prior to construction start.	09-01-86	07-07-86	CEC	PCR #1 7-17-86 Att. D PCR #2 10-15-86. Att. D
07-06	Compltd.	Deleted per GEC letter 4-21-86, Att. 7-6				
07-07	Compltd.	Same as #07-05.			CEC	Letter to PG&E 7-7-86, Att #7-7 Letter to CEC 7-7-86, Att #7-7
08-01	Compltd.	Discuss soils erosion mitigation measures in first PCR.	07-01-86	07-07-86	CEC	PCR #1
08-02	Compltd.	Discuss restoration of transmission line & gas line land in 1st PCR.	07-01-86	07-01-86	CEC	PCR #1
08-03	Compltd.	Discuss restoration of transmission & gas line land in quarterly construction reports.	10-01-86	12-31-87	CEC	PCR #4 1-13-87 Att. #5-3 PCR #6 7-10-87, Att. 3 PCR #7 10-15-87 2nd Annual PCR #8, Att.8-3
09-01	Compltd.	In 1st PCR submit proposed mitigation measures and status of each.	07-01-86	07-17-86	CEC	PCR #1, 7-17-86, Att. G
09-02	Compltd.	Spill containment oil tank-Submit detail construction drawing 60 days prior to berm construction.	02-01-87	07-24-86	CEC	Bechtel letter GF03015 7-24-86 Bechtel letter GF04030 9-19-86 Bechtel letter GF04647 10-17-86
09-02	Compltd.	Spill containment acid & cautic tanks-Submit detailed construction drawing 60 days prior to containment construction.	09-15-86	09-19-86	CEC	PCR #2 10-15-86, Att. E PCR #8 12-31-87, Att. 9-2

09-03	Compltd.	GEC submit detailed construction drawings on pipelines 60 days prior to pipeline construction.	08-01-86	07-07-86	CEC	PCR #1 7-17-86, Att. E PCR #2 10-15-86, Att. F PCR #7 10-15-87, Att. 4
09-04	Compltd.	Name & registration no. of civil engineer for site grading & drainage plans, erosion and related civil work to CEC & CBO 10 dys prior to grading plan submittal.	04-18-86	03-14-86	CEC CBO	Bechtel letter 3-14-86
09-05	Compltd.	Submit grading plans, specs & cals & soils report to CBO 60 days prior to start grading.	04-25-86	05-20-86	CEC CBO	Letter from GEC to CEC 4-10-87. Att. I
09-06	Compltd.	Pay CBO permit fees with a copy of transmittal to the CEC.		As reqd	CEC	2nd Annual PCR #8 12-31-87 Att. #9-6
09-07	Compltd.	Civil site engineer name & regis. no. to CEC & CBO 10 days prior to site work.	06-15-86	06-04-86	CEC	2nd Annual PCR #8 12-31-87 Att. #9-7
09-08	Compltd.	Start Construction Monthly Progress Rpts	08-01-86	12-31-87	CEC	Final monthly report completed.
09-09	Compltd.	CBO and/or CEC may inspect plant site grading operations. If CBO delegates inspection to GEC then monthly reports must be filed.				As required.
09-10	Compltd.	During and after completin of grading in excess of 5000 c.y. GEC shall submit to CEC a copy of all CBO review comments & approvals.	07-25-86	10-06-86	CEC	PCR #1 7-17-86 PCR #2 10-15-86. Att. H
09-11	Compltd.	GEC shall inform CEC of geologic design changes approval 10 days after CBO receives such changes (site geologist to alert CBO of changes encountered only if site conditions change.		12-31-87		No changes in site conditions.
09-12	Compltd.	GEC submit document to CBO - As built of grading with all test reports, etc. 60 dys prior to final foundation prep.	09-12-86	09-19-86	CEC	PCR #2, 10-15-86, Att. G
09-13	Compltd.	Soil report, foundation and plan. GEC submit documents to CBO 60 days prior to start foundation.	07-11-86	09-19-86	CEC	2nd Annual PCR #8, Att. #9-13 PCR #2 10-15-86 Att. G
09-14	Compltd.	Submit as built of grading and erosion for review within 180 days after work completion.	08-28-87	08-28-87	CEC	2nd Annual PCR #8, Att. #9-14
09-15	Compltd.	GEC site engineer submit reports to CBO and a copy to CEC of graded plans and mods to foundations modified due to site conds.	09-01-86	10-06-86	CEC	PCR #2 10-15-86, Att. H
09-16	Compltd.	Signed statement required stating transmission line as-built complies with CPUC GO 95 within 90 days of completion.	10-01-87	09-02-87	CEC	PCR #7
09-17	Compltd.	Signed statement required stating that the gas lines as built complies with CPUC	09-15-87	09-02-87	CEC	PCR #1, Att. E PCR #7 10-15-87, Att. 4

GO 112-D within 90 days of completion.

10-01	Compltd.	Cost effectiveness analysis of seismic design criteria to CEC submitted by applicant 120 days before start of const.	02-28-86	03-15-86	CEC	
10-01	Compltd.	Submit to CEC a verification statement that all design construction & inspection reqmts. have been met 14 days prior to compl.optn.	12-15-87	03-29-88	CEC	PCR #9 CEC #10-01
10-02	Compltd.	Identification of structural engineer to CEC-60 days prior to building plan submit.	03-14-86	03-14-86	CEC	Bechtel letter 3-14-86
10-03	Compltd.	Submit final design drawings, calculs. & specs for any structure or foundation 120 days prior to construction start.	05-16-86	06-17-86	CEC	Bechtel letter GF05974 12-22-86
10-04	Compltd.	Licensee make payment to CBO at submittal of drawings, specs, & soils rpt.	05-01-86	01-15-87	CEC	PCR #1 Monthly Progress Rpt. June'86
10-05	Compltd.	Apply for an in lieu building permit from the CBO and advise the CEC.	07-01-86	05-07-86	CEC	PCR #1 Monthly Progress Rpt. June'86
10-06	Compltd.	Licensee shall submit monthly construction reort to CBO & CEC.	As reqd	12-31-87	CEC	Monthly Progress Reports Refer Monthly Progress Reports
10-07	Compltd.	Prior to issuance of building permit license shall identify resident civil engineer and weld inspectors to CEC & CBO at least 60 days prior to any activity.	05-01-86	06-04-86	CEC	PCR #2, Att. I 2nd Annual PCR #8, Att. #10-7
10-08	Compltd.	Notify CBO when ready for inspection (all inspectors to submit monthly rpts to CBO).		As reqd	CBO	2nd Annual PCR #8 12-31-87, Att. #10-8
10-09	Compltd.	Licensee shall file changes in final specs.& drwgs. per UBC section 303 to CBO and copy of letter to CEC and notify CBO 15 days prior to filing changes.		As reqd	CEC	2nd Annual PCR #8 12-31-87 Att. #10-9
10-10	Compltd.	Licensee shall inform CEC of approval of as built drawings" by CBO and when Certificate of Occupancy has been issued.	02-06-87	10-05-87	CEC	PCR #5 4-10-87 PCR #7 10-15-87, Att. 5 PCR #8 12-31-87, Att. 10-10
10-11	Compltd.	Licensee submit monthly to CBO reports of concrete and weld testing and shall inform CEC approved or disapproved the reports within 30 days.	09-19-86	11-11-86	CEC	PCR #5 4-10-87 PCR #8 12-31-87, Att. #10-11
10-12	Compltd.	Licensee shall submit to CBO & CEC schedule of critical mech. & elect. foundation plan submittals, master drawing list and specs. list 95 days prior to intended date of first increment construc.	12-28-85	03-03-86	CBO CEC	Included with Monthly Progress Reports
10-13	Compltd.	Submit preliminary design, loads, etc. on a) GTG B)STG c)HRSRG prior to start of final design for CEC review and approv.	04-04-86	04-18-86	CEC	Previously submitted.
11-01	Compltd.	Discuss waste management measures in	07-01-86	10-06-86	CEC	PCR #2 10-15-86

first PCR.

11-02	Compltd.	Discuss additional mitigation measures	07-01-86	10-06-86	CEC	PCR #2 10-15-86
11-03	Compltd.	Obtain sewage permit from City of Gilroy prior to operation.	10-01-86	11-22-86	CEC	PCR #4 1-7-87, Att. II
11-04	Compltd.	Submit statement identifying the disposal site/or methods to be used during construction approved by Central Coast Regional Water Quality Control Board (CCRWQCB) in first monthly construction report.	08-01-86	06-24-86		PCR #1 7-17-86, Att. F
11-05	Compltd.	Submit final waste disposal plan - also issued to City of Gilroy & County of S.C. 90 days prior to operation.	04-15-87	06-19-87		PCR #6 7-1-87, Att. 4
11-06	Annual	Submit any waste enforcement actions in Annual PCR.	01-01-88	12-31-87	CEC	Annual Compliance Report No action in 2018
11-07	Closed	Obtain Hazardous Waste Permit from CDHS and submit copy for GFD & CEC within 90 days after start of operation.	05-01-88	01-11-90		3rd Annual PCR #12 12-31-88 Attmt.A 5th Annual PCR #20 12-31-90 Attmt.A PCR #21 3-31-91 Attmt.A
11-08	Annual	CGC has to notify the CEC if it applies for a Hazardous Waste Facility Permit. (See #11-07 - Closed until applied for.)	01-01-88		CEC	No action in 2018
11-09	Annual	Discuss in Annual PCR, hazardous waste, its disposal, testing, quantities, etc.	01-01-87	12-19-86	CEC	Annual Compliance Report
11-10	Annual	Submit Annual PCR to CEC of waste discharges.		12-31-88	CEC	Annual Compliance Report
12-01	Compltd.	Submit statement that handling procedures for natural gas per NFPA 30 & 54 30 days prior to commercial operation.	12-01-87	12-12-87	CEC	2nd Annual PCR #8 12-31-86 Attmt. 12-01
12-02	Compltd.	Submit statement that fuel oil storage and handling per NFPA Standard 30 & Title 8 of CAC, Chapt. 4, Subchptr. 7, Group 10, 30 days prior to commercial operat.	03-31-88	04-15-88	CEC	2nd Annl.PCR #8-Att. 12-02 PCR #9 - Att. I - CEC# 12-2
12-03	Compltd.	Verify fuel oil tank in compliance with API standard 650, append. E, See ST 19/81 30 days prior to commercial operat.	12-01-87	05-29-87	CEC	
12-04	Compltd.	Submit statement of storage & handling of sodium hypochlorite within 90 days after commercial operation.	04-01-88	04-15-88	CEC	PCR #9 - Att. I - CEC #12-4
12-05	Compltd.	Verify sodium hypochlorite storage tank designed and fabricated per ASME Section 8 and anchored per Acl 349-80,Append. B	12-01-87		CEC	25th Annual PCR #58 02-15-2011 NO COMPLAINTS/INSPECTIONS
12-06	Compltd.	Submit statement on storage and handling of sulfuric acid within 90 days after commercial operation.	05-01-88	04-15-88	CEC	PCR #9 - Attmt. I - CEC #12-6

12-07	Compltd.	Verify sulfuric acid storage tank is per ASME Section 8 & anchored per ACI 349-80, Appendix B 30 days prior to commercial operation.	12-01-87		CEC	25th Annual PCR #58 02-15-2011 NO COMPLAINTS/INSPECTIONS
12-08	Compltd.	Submit statement on storage and handling of sodium hydroxide within 90 days after commercial operation.	05-01-88	04-15-88	CEC	PCR #9 - Att. I - CEC #12-8
12-09	Compltd.	Verify sodium hydroxide storage is per ASME Section 8 & anchored per ACI 349-8, Appendix B, 30 days prior to comm.operat.	12-07-87	12-31-87	CEC	25th Annual PCR #58 02-15-2011 NO COMPLAINTS/INSPECTIONS (Tank not in use)
12-10	Compltd.	Submit statement on storage and handling of lube oil with 90 days after commercial operation.	05-01-88	04-15-88		PCR #9 - Att. I - CEC #12-10
12-11	Compltd.	Submit construction fire protection program to City of Gilroy Fire Dept. 45 days prior to site clearing.	05-09-86	06-01-86		
12-12	Compltd.	Submit operational fire protection plan to Gilroy Fire Dept. 45 days prior to turbine roll.	06-01-87	06-17-87	CEC	PCR #6 7-10-87, Att. 5
12-13	Compltd.	Submit affidavit from underwriters that fire protection system is per code prior to turbine roll.	09-01-87	12-31-87	CEC	PCR #7 10-15-87 PCR #8 12-31-87, Att. 12-13
12-14	Compltd.	Submit final fire protection system design to Gilroy Fire Dept. prior to turbine roll.	09-01-87	12-31-87	CEC	PCR #7 10-15-87 PCR #8 12-31-87, Att. 12-14
12-15	Annual	Annual re-examine the fire protection program with the GFD and note in Annual Report.	01-01-88		CEC	Annual Compliance Report
12-16	As Required	Request Cal-Osha notify the CEC of safety violation affecting the schedule. Refer any Cal-Osha inspections in PCR's.		As reqd.	CEC	Annual Compliance Report NO COMPLAINTS/INSPECTIONS
12-17	Compltd.	Have Cal/Osha Consultation Service review accident prevention program and copy of letter stating compliance with sections 1509, 3203, Title 8, CEC prior to start of site work.	07-01-86	05-23-86	CEC	
12-18	Compltd.	Submit statement on handling and storage of hydrogen gas per title B, CAC, Artle. 138 within 90 days after comm. optn.	05-01-88	04-15-88	CEC	PCR #9 - Att. I - CEC #12-18
12-19	Annual	Report in Quarterly PCR any violation of hydrogen storage specification DOT Reg.49 CFR 173.302		As reqd.	CEC	Annual PCR #62 02-15-2015 NO COMPLAINTS/VIOLATIONS
13-01	Compltd.	Request approval of any proposed changes to specified transmission line parameters.	As reqd.	10-15-87	CEC	PCR #7 10-15-87, Att. 6 & 7
13-02	Compltd.	Submit statement that transmission line	09-01-87	10-01-87	CEC	PCR #7 10-15-87, Att. 6 & 7

		design and construction complies with CEC conditions within 60 days of line' completion.				
13-03	Compltd.	Inform CEC of transmission line route 60 days prior to the start of construction.	07-01-86	03-11-85	CEC	PCR #1 7-17-86
14-01	Compltd.	If transmission tower height >200 ft. or intrudes into an airport space, file a notice with the FAA 30 days before the start of construction.	08-01-86	01-14-87	CEC	PCR #1 7-17-86 PCR #2 10-15-86 PCR #7 10-15-87, Att. 6
14-02	Compltd.	Same as #13-02				
14-03	Compltd.	Submit statement verifying grounding requirements have been met within 60 days of line's completion.	09-01-87		CEC	PCR #7 10-15-87, Att.8
14-04	Closed	Maintain records of notification and grounding for objects in transmission line right of way.		04-15-88	CEC	PCR #9 - Att. I - CEC #14-04 PCR #10-Attmt. C #12-19 PCR #11-Attmt.A dated 10/26/88
14-05	As Required	Safety inspection by Cal-Dosh during construction & operation of transmission line or when an employee complaint has been received per Safety Cond. #16.		As reqd		NO COMPLAINTS FILED.
14-06	Closed	Maintain records of complaints and corrective action on transmission line interference.		As reqd		No complaints filed.
15-01	Compltd.	Submit any change to plant design proposed in AFC which would affect project capacity factors--as reqd.		As reqd	CEC	PCR #1 7-17-86 No changes.
15-02	Annual	Submit an annual report of plant availability and capacity factors.	12-31-88		CEC	Annual Compliance Report
15-03	As Required	Submit copy of final agreement specified in Cond. #1 prior to construction. Submit copy of any future amendments to power purchase agreement.		06-16-86	CEC	
15-04	Annual	Annually, report the monthly generation provided to PG&E & monthly payments received from PG&E.	12-31-88		CEC	Annual Compliance Report Order No. 90-0523-17(c) Amendment Change on 5-23-90 - Not required to report monthly pymts to PG&E.
15-05	Annual	Submit in Annual report, monthly average values for plant operation parameters listed on Page 84 of Compliance Plan.	12-31-88		CEC	Annual Compliance Report
16-01	Compltd.	Submit procedure to City of Gilroy and S.C.C. Planning Dept. for handling public complaints 90 days prior to start of site prep.	04-04-86	06-01-86	CEC	PCR #1 7-17-86, Att. H
16-02	Closed	Conduct noise surveys as requested by the City of Gilroy or the SCCPD.		As reqd		28th Annual PCR #61 03-03-2014 None requested.
16-03	Compltd.	Conduct 24 hr noise survey within 90	02-01-88	03-15-88		PCR #9-CEC #16-3-Woodward/Clyde

days of commercial operation.

Report attached.

16-04	Compltd.	Same as #16-03 only within fence of plant site.	05-01-88			3rd Annual PCR 12 12/31/88 Att.D
16-05	Compltd.	Submit report specifying how and/or where the mitigation measures noted on Page 87 & 88 in Compliance Plan 90 days after commercial operation.	04-01-88	07-22-88		PCR #10-Attmt. E, Becht. letter dated 7-22-88
16-06	Compltd.	GEC shall limit site prep to daylight hours except in emergency cases.	05-01-87	07-22-88		PCR #10- Construction completed No emergencies occurred.
17-01	Compltd.	Submit HVAC spec & design to CBO 120 days prior to intended construction, notify CEC when ready for operation.	08-01-86	10-15-86	CBO	Submittal as part of Control Bldg. Construction to CBO.
17-02	Compltd.	Submit electrical calculations & specs statement that all is per Natl.Electr. Code	09-12-86	09-18-86	CEC	PCR #2 10-15-86, Att. J Letter from GEC to CEC #172, 4-10-87, Att. II
17-03	Compltd.	Submit final design of domestic plumbing including calculations, specs, etc. 120 days prior to construction.	08-01-86	10-15-86	CEC	PCR #4 1-7-87 Letter from GEC to CEC #172 4-10-87. Att. II
17-04	Compltd.	Submit plant piping design & specs 120 days prior to construction.	10-01-86	11-17-86	CEC	PCR #4 1-7-87 Letter from GEC to CEC #172 Att. III
17-05	Compltd.	Submit pressure vessel design calculs. & specs 120 days prior to construction.	09-10-86	11-17-86	CEC	PCR #2 10-15-86 PCR #4 1-7-87
17-06	Compltd.	Submit design calculations for all tanks per API 650 120 days prior to start of construction.	09-01-86	10-06-86	CEC	PCR #2 10-15-86 PCR #4 1-7-87
17-07	Compltd.	GEC shall submit documents for fuel pipeline systems showing the design meets stated codes 120 days prior to start of construction.	10-01-86	09-17-86	CEC	PCR #4 1-7-87
17-08	Compltd.	Submit specs showing seismic & structure design criteria for critical electrical equipment to CEC 90 days prior to construction start.		As reqd	CEC	2nd Annual PCR #8 12-31-87, Att. 17-8
18-01	Closed	CGC will file the decommissioning plan with the CEC for its approval.				As Required.
19-01	Closed	Gentry Moisture Issue				GFI now owns Gentry Foods. No longer an issue.

Appendix 1

Calpine Gilroy Cogen, LP
 Gilroy, CA
Quarterly S-100, S-101 & S-102 Combined CO Emissions
 CEC Condition 1.3
 2018

Operational Limits
12-month Rolling Total
 Combined S-100, S-101 & S-102 CO Emissions - 100 tons

Month	Facility NOx lbs Monthly	Facility NOx tons 12-Month Rolling Total	Facility CO lbs Monthly	Facility CO tons 12-Month Rolling Total
January	78	13.2	402	9.7
February	1771	14.0	1585	10.1
March	74	13.8	293	9.6
April	1079	14.3	1097	10.1
May	184	13.8	484	9.8
June	1141	12.8	905	9.5
July	6664	13.6	4269	10.1
August	5442	14.1	3989	10.7
September	778	12.8	649	9.9
October	1916	11.2	1628	9.1
November	179	9.7	204	7.9
December	1783	10.5	1891	8.7

Appendix 2

2018 Calpine Gilroy Cogen, LP. Recycled Water Summary

CFC 06-09 and 06-10

	Total (gals.)	Daily Minimum	Daily Max	Monthly Average	Total (acre-feet)
January	68,450	0	68,450	17,113	0.2
February	1,970,300	0	541,340	492,575	6.0
March	32,120	0	20,470	8,030	0.1
April	1,107,220	0	376,860	1,107,220	3.4
May	40	0	10	6	0.0
June	952,460	0	377,080	59,529	2.9
July	12,974,820	0	788,730	480,549	39.8
August	9,990,680	0	839,540	434,377	30.7
September	611,140	0	294,690	32,165	1.9
October	2,171,370	0	369,790	77,549	6.7
November	390	0	370	22	0.0
December	2,731,110	0	637,570	2,731,110	8.4
TOTAL	32,610,100				100.1

Appendix 3

2018 Calpine Gilroy Cogen, LP. Hazardous Waste Summary

CFC 11-09

Date	Manifest Number	Description	Hazardous Waste Transporter	US EPA ID	Designated Facility	US EPA ID	Total Quantity
1/31/2018	018150131JJJ	Oily Solids/Debris and Used Oil	Environmental Logistics, Inc.	CAR000172460	Filter Recycling Services, Inc.	CAD982444481	150 lbs. 25 gallons
5/23/2018	018150954JJJ	Oily Solids/Debris and Used Filters	Environmental Logistics, Inc.	CAR000172460	Filter Recycling Services, Inc.	CAD982444481	280 lbs. 200 lbs. 50 gallons
10/3/2018	017177903JJJ	Used Oil; Oily Solids/Debris and Absorbents with Sulfuric Acid	Environmental Logistics, Inc.	CAR000172460	Filter Recycling Services, Inc.	CAD982444481	100 lbs. 10 lbs.
11/28/2018	019760330JJJ	Oily Solids/Debris	Environmental Logistics, Inc.	CAR000172460	Filter Recycling Services, Inc.	CAD982444481	450 lbs.

Appendix 4

2018 Calpine Gilroy Cogen, LP. Waste Summary

CFC 11-10

Waste Stream	Type	Disposal Method
Non-hazardous Solid Waste	Recyclables	Recycle (Off-site)
	Non-Recyclables	Landfill
Non-hazardous Liquid Waste	Sanitary Waste	Sewage Treatment Plant
	Process Waste Water	OLAM
Hazardous Liquid Waste	Used Oil	Recycle (Off-site)
	Oily Water	Off-site disposal company
	Corrosive Liquid	Off-site disposal company
Hazardous Solid Waste	Used Oil Filters	Recycle (Off-site)
	Oily Rags	Off-site disposal company
	Universal Waste	Recycle (Off-site)

Appendix 5

**Calpine Gilroy Cogen, L.P.
CFC 15-02**

2018

OUTAGE HOURS

	<u>PLANNED</u>	<u>FORCED</u>	Days	Period Hours	PO%	FO%	Availability
JANUARY	0.00	101.96	31	744	0.00%	13.70%	86.3%
FEBRUARY	0.00	11.42	28	672	0.00%	1.70%	98.3%
MARCH	0.00	14.66	31	743	0.00%	1.97%	98.0%
APRIL	450	39.19	30	720	62.5%	5.44%	32.1%
MAY	0.00	0	31	744	0.00%	0.00%	100.0%
JUNE	0.00	5.9	30	720	0.00%	0.82%	99.2%
JULY	0.00	0	31	744	0.00%	0.0%	100.0%
AUGUST	0.00	133.2	31	744	0.00%	17.90%	82.1%
SEPTEMBER	0.00	4.96	30	720	0.00%	0.69%	99.3%
OCTOBER	0.00	218.8	31	744	0.00%	29.41%	70.6%
NOVEMBER	0.00	4.86	30	721	0.00%	0.67%	99.3%
DECEMBER	0.00	40.50	31	744	0.00%	5.44%	94.6%
TOTAL	450.0	575.5		8760			

2018 OPERATIONAL AVAILABILITY 88.3%

2018 CAPACITY FACTOR 11.7%

Appendix 6

Calpine Gilroy Cogen, L.P.
CFC 15-04 and CFC 15-05
Compliance Year 2018

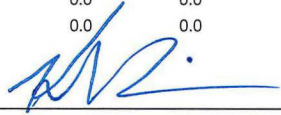
CFC 15-04

	January	February	March	April	May	June	July	August	September	October	November	December
Total generation provided to PG&E (MWh)	-	6216	-	3129	-	2,412	41,633	34,846	1,718	4,868	-	7861

CFC 15-05

	January	February	March	April	May	June	July	August	September	October	November	December
1. Gas Turbine, MWh (gross)	-	4,639	-	2,297	-	1,774	30,601	25,612	1,283	3,707	-	5,910
2. Gas Turbine, Operating Hours	-	68	-	38	-	30	427	362	20	59	-	82
3. Steam Turbine, MWh (gross)	-	1,833	-	945	-	725	12,499	10,508	519	1,499	-	2,318
4. Steam Turbine, Operating Hours	-	61	-	32	-	26	421	354	18	54	-	77
5. Net plant output, (MWh)	-	6,216	-	3,129	-	2,412	41,633	34,846	1,718	4,868	-	7,861
6. Process steam from steam turbine												
a. average klb/hr	-	-	-	-	-	73.2	65.6	67.5	69.5	70.3	-	57.9
b. production hours	-	-	-	-	-	10.0	347.0	297.0	6.0	25.0	-	57.0
c. average temp., deg F	-	-	-	-	-	381.7	383.4	378.3	368.0	367.7	-	368.0
d. average pressure, psig	-	-	-	-	-	150.1	153.6	153.2	152.0	152.6	-	156.6
7. Process steam from auxiliary boilers												
a. average klb/hr	17.8	16.9	18.3	10.5	31.0	40.2	20.4	22.9	39.6	38.9	28.8	12.1
b. operating hours	744	672	743	720	744	720	744	744	720	744	721	744
PG&E curtailments												
a. total, No.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
b. total, hours	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
c. partial, No.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
d. partial, hours	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Certified by:


 Kevin Karwick

Authorized Signatory and General Manager

Date:

3/26/19