

**DOCKETED**

<b>Docket Number:</b>	01-AFC-19C
<b>Project Title:</b>	SMUD Cosumnes Power Plant - Compliance
<b>TN #:</b>	231118
<b>Document Title:</b>	SMUD Cosumnes Power Plant - 2018 Annual Compliance Report
<b>Description:</b>	2018 Annual Compliance Report for the SMUD Cosumnes Power Plant.
<b>Filer:</b>	Mary Dyas
<b>Organization:</b>	EthosEnergy
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	12/11/2019 8:03:18 AM
<b>Docketed Date:</b>	12/11/2019



14295A Clay East Road  
Herald, CA 95638

209-748-5177 (main)  
209-748-5178 (fax)

February 28, 2019

Ms. Mary Dyas  
Compliance Project Manager  
California Energy Commission  
1516 9th Street, MS-2000  
Sacramento, California 95814-5512

Re: 2018 Annual Compliance Report  
Cosumnes Power Plant  
CEC Docket Number 01-AFC-19C

Ms. Dyas,

Pursuant to CEC Application for Certification (01-AFC-19C) requirements, the 2018 Annual Compliance Report for the Cosumnes Power Plant has been submitted to you as a pdf email attachment.

The following information is included in the Annual Compliance Report:

AQ – 43	Road repairs	VIS – 5	Lighting complaints
AQ – 34	Air quality reports	Plume – 1	Cooling tower operation
BIO – 19	Mitigation measures	Waste – 3	Waste management
BIO – 2	Summary of biological activities	Water Quality – 7	ZLD operation report
BIO – 5	Mitigation implementation	Water RES – 1	Water usage
HAZ – 1	Hazardous chemicals list	GEN – 8	Final approved engineering plans
VIS – 2	Painting and maintenance	COM – 7	Annual Compliance Report contents

I certify based on information and belief formed after reasonable inquiry, that the statements and information in this document and supplements are true, accurate and complete. Should you have any questions, please do not hesitate to call me at 209-748-5179.

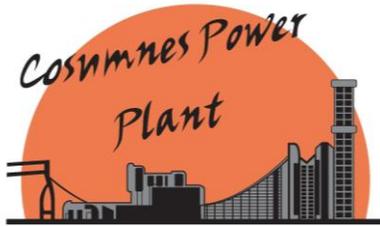
Best Regards,

Dave Blevins  
Facility Manager  
209-748-5177 x302 (O)  
916-955-3692 (C)

cc: via email:  
Eric Poff, SMUD  
Rene' Toledo, SMUD  
Mary Hetherington, Castle Peak Engineering  
Randall Blank, EthosEnergy PPS



[www.ethosenergygroup.com](http://www.ethosenergygroup.com)



*Cosumnes Power Plant, Herald, CA*

## **2018 Annual Compliance Report**

**California Energy Commission**



*Submitted by: EthosEnergy Power Plant Services (EE PPS)*

*On behalf of: Sacramento Municipal Utility District Financing  
Authority*

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		Vis -2	Surface treatment of project structures and buildings.	All structures are properly treated with CEC approved color. Surfaces painted as required.
		Vis -5	Lighting complaints and resolution.	No lighting complaints were received during 2018.
		Plume -1	Cooling tower operated so that the plume frequency will not increase from the design as certified. There were no cooling tower design changes in 2018.	Cooling tower operations satisfied limits specified in Plume – 1 during 2018. There were no complaints filed over cooling tower plume.
		Waste -3	Actual waste management methods used during the year compared to planned management methods.	2018 waste management operations did follow the waste management plan.
25	G	Water Quality -7	Status report on operation of the ZLD, including disruptions, maintenance, volumes of interim wastewater streams stored on site, volumes of residual salt cake generated and landfills used for disposal.	Attachment G
27	H	Water Res -1	Submit a water use summary, 2,663 AFY (over any 3 successive calendar years) shall not be exceeded.	Attachment H

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		Gen -8	Storage of final approved engineering plans, specifications, and calculations.	Available at CPP and any district computer terminal.
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## **Annual Compliance Report - Introduction**

CEC Docket 01-AFC-19, condition COM-7 requires that the Consumes Power Plant (CPP) submit an Annual Compliance Report for the 2018 Compliance Period. Per COM-7 the following information is included in this report:

1. An updated compliance matrix which shows the status of all conditions of certification (fully satisfied and/or closed conditions do not need to be included in the matrix after they have been reported as closed);
2. A summary of the current project operating status and an explanation of any significant changes to facility operations during the year;
3. Documents required by specific conditions to be submitted along with the Annual Compliance Report. Each of these items must be identified in the transmittal letter, and should be submitted as attachments to the Annual Compliance Report;
4. A cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM;
5. An explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided;
6. A listing of filings made to, or permits issued by, other governmental agencies during the year;
7. A projection of project compliance activities scheduled during the next year;
8. A listing of the year's additions to the on-site compliance file;
9. An evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date; and
10. A listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved complaints, and the status of any unresolved complaints.

## Attachment A: AQ-43 Pictures of Roads for SMAQMD ERC

AQ-43 - SMUD shall ensure that the paved roads described in SMAQMD ERC applications 00767-00769, 00772-00775 are properly maintained and repaired. All of the roads were found to be in good condition, and are being properly maintained and repaired. The following pictures illustrate the condition of the roadways as of February 22, 2019.

District ERC application 00767 – The pavement was in good condition.



District ERC application 00768 – The pavement was in good condition.



District ERC application 00769– The pavement was in good condition.



District ERC application 00772 – The pavement was in good condition.



District ERC application 00773 – The pavement was in good condition.



District ERC application 00774 – The pavement was in good condition.



District ERC application 00775 – The pavement was in good condition.



## Attachment B

### AQ-34 Air Quality Annual Report Summary

<u>Condition</u>	<u>Description</u>	<u>2018 Annual Status</u>			
		<b>2018Q1</b>	<b>2018Q2</b>	<b>2018Q3</b>	<b>2018Q4</b>
AQ-1, AQ-3, AQ-5, AQ-34	Record of Emissions Monitoring Equipment operational status	2 events reported in attachment B.1	Fully Operational	Fully Operational	Fully Operational
AQ-16	Record of compliance with daily visible emissions	No visible emissions	No visible emissions	No visible emissions	No visible emissions
AQ-17, AQ-34	Exceedance of <i>hourly CTG mass emission rates</i> : hourly records of NOx, CO (3-hour), VOC, SOx, and PM10 (including 3-hour Bag house limit from the Title V "TV" PTO)	No exceedances	No exceedances	No exceedances	1 event reported in attachment B.1
AQ-20	Exceedance of <i>hourly CTG emission rates</i> : hourly records of NOx	No exceedances	No exceedances	No exceedances	No exceedances
AQ-21, AQ-22	Exceedance of <i>3-hour averaged CTG emission rates</i> : hourly records of CO and VOC	No exceedances	No exceedances	No exceedances	No exceedances
AQ-23	Exceedance of <i>3-hour averaged NH<sub>3</sub> emission rates</i>	No exceedances	No exceedances	No exceedances	No exceedances
AQ-24	Exceedance of <i>3-hour averaged Cooling Tower TDS rates</i>	No exceedances	No exceedances	No exceedances	No exceedances
AQ-18, AQ-34	Exceedance of <i>daily CTG, Bag House (TV PTO) and Cooling Tower emission rate</i> : daily exceedance records of NOx, CO, VOC, SOx, and PM10	No exceedances	No exceedances	No exceedances	No exceedances
AQ-19	Quarterly CTG cumulative emissions: records of NOx, CO, VOC, SOx, and PM10 (including Bag House per TV PTO). Combined emissions of both gas turbine generators and cooling tower (PM-10)	Reported in Attachment B.2.	Reported in Attachment B.2.	Reported in Attachment B.2.	Reported in Attachment B.2.
AQ-26	Exceedance of start-up, shut-down or short term excursion limits	No exceedances	No exceedances	No exceedances	No exceedances

# Attachment B.1

## Record of Emissions Monitoring Equipment operational status. & Record of Exceedance Event

All Continuous Emission's Monitoring equipment was fully operational for 2018 but for the following events:

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

### BREAKDOWN CONDITION REPORTING FORM

(Rule 602)

Notice: Complete and return this report to the SMAQMD within 7 days after your breakdown has been corrected.

LOCATION OF BREAKDOWN (PLEASE PRINT OR TYPE)			
Name of business: <u>Cosumnes Power Plant</u>			
Address: <u>14295 Clay East Road</u>	<u>Herald</u>	<u>CA</u>	<u>95638</u>
<small>Street Address</small>	<small>City</small>	<small>State</small>	<small>Zip Code</small>
Equipment involved: <u>Unit 2 CEMS NOx/O2 Analyzer</u>		SMAQMD Permit Number: <u>TV2012-19-01</u>	
Name of person providing information: <u>Randall Blank</u>		Title: <u>HSE Manager</u>	
Date of breakdown: <u>01 / 25 / 2018</u>	Time of breakdown: <u>09:27</u>	<input checked="" type="checkbox"/> AM	<input type="checkbox"/> PM
Date reported to SMAQMD: <u>01 / 25 / 2018</u>	Time reported to SMAQMD: <u>10:25</u>	<input checked="" type="checkbox"/> AM	<input type="checkbox"/> PM
CAUSE OF BREAKDOWN			
Sample flow and pressure was lost to Unit 2's NOx/O2 analyzer causing an out of control calibration, monitor downtime and invalid data.			
CORRECTIVE MEASURES TAKEN			
The capillary tube, ozonator dryer, mother board, flow and pressure sensor board, and O2 sensor were replaced and all necessary QA tests passed the following day. Cosumnes Power will replace the parts in inventory. SMAQMD Inspector Don Dumaine came to the site on 1/30/18.			
ESTIMATED EMISSIONS DURING BREAKDOWN CONDITION (not required for Phase-II vapor recovery systems)			
Unit was at steady state, emissions remained compliant during the breakdown period. Monitor Downtime and Representative data will be substituted and/or invalidated as prescribed by regulation.			

Please print or type

I, Dave S. Blevins hereby certify that the breakdown condition described above

was corrected at 14:19  AM  PM on 1/26/2018 and that the facility is now in

compliance with SMAQMD Rules.

X  Date: 1/30/2018

Facility Manager Telephone number: (209)-748-5177

Title  
M:\ICPP Master Filing System\7.0 Regulatory Compliance\7.1 Air Quality\7.1.5 Other Records\7.1.5.5 CEMS Malfunction Reports\2017

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT  
**BREAKDOWN CONDITION REPORTING FORM**  
**(Rule 602)**

**Notice:** Complete and return this report to the SMAQMD within 7 days after your breakdown has been corrected.

<b>LOCATION OF BREAKDOWN</b> <small>(PLEASE PRINT OR TYPE)</small>			
Name of business: <u>Cosumnes Power Plant</u>			
Address: <u>14295 Clay East Road</u>	<u>Herald</u>	<u>CA</u>	<u>95638</u>
<small>Street Address</small>	<small>City</small>	<small>State</small>	<small>Zip Code</small>
Equipment involved: <u>Unit 3 HRSG/CTG Expansion Joint</u> SMAQMD Permit Number: <u>TV2012-19-01</u>			
Name of person providing information: <u>Dave Blevins</u>		Title: <u>Facility Manager</u>	
Date of breakdown: <u>3 / 12 /2018</u>		Time of breakdown: <u>15:05</u> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	
Date reported to SMAQMD: <u>3 / 12 /2018</u>		Time reported to SMAQMD: <u>16 :01</u> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	
<b>CAUSE OF BREAKDOWN</b>			
Fatigue in the fabric material. Small tear (1.5 inch long) on the fabric on the expansion joint.			
<b>CORRECTIVE MEASURES TAKEN</b>			
The unit was shut down. A new section of high temperature fabric/insulation was made and was installed over the existing fabric/insulation that had the leak. The fabric/insulation was clamped into place using the existing clamps. The entire expansion joint's condition was assessed. A determination was made to replace the expansion joint during the outage beginning in April 2018. SMAQMD Inspector Don Dumaine was notified of the repair on 3/13/2018.			
<b>ESTIMATED EMISSIONS DURING BREAKDOWN CONDITION</b> <small>(not required for Phase-II vapor recovery systems)</small>			
Emissions of 0.28 lb of NOx and 0.04 lb of CO, are estimated for this event (beginning 12 hours earlier, i.e., during the 3/12/18 morning inspection of watch).			

Please print or type

I, Dave S. Blevins hereby certify that the breakdown condition described above  
First name, Middle initial, Last name

was corrected at 06 :04  AM  PM on 3/13/2018 and that the facility is now in  
Time Date  
 compliance with SMAQMD Rules.

x  Date: 3/19/2018  
Signature

**Facility Manager** Telephone number: (209) 748-5177  
Title

M:\CPP Master Filing System\7.0 Regulatory Compliance\7.1 Air Quality\7.1.5 Other Records\7.1.5.5 CEMS Malfunction Reports\2015

## I. FACILITY IDENTIFICATION

1. Facility Name: Sacramento Municipal Utility District Financing Authority (SFA )
2. Street Address or Source Location: 14295A Clay East Road, Herald, CA 95638

## II. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: TV2012-19-01
2. Description of deviation: Unit 2's PM10 and VOC lb/hr parameters deviated above their 1-hour limits.
3. Description and identification of permit condition(s) deviated: Condition B.2.A (VOC lb/hour) and B.2.D, (PM10 lb/hr), Emission Limitation Requirements, Equipment Specific, Federally Enforceable Requirements.
4. Associated equipment and equipment operation (if any): Gas Turbine Unit #2 1865 MMBTU/hour heat input and the CEMS (including DAHS).
5. Date and time when deviation was discovered: 12-20-2018 at 1158.
6. Date, time and duration of deviation: 12-19-2018 at 1400: 1 hour.
7. Probable cause of deviation: Gas Turbine Unit #2's average heat input for the hour ending at 1359 was above the 1865 MMBTU/hr listed in the permit's equipment description. The permit's VOC and PM10 emission factors are 0.00177 and 0.00483 (lb/MMbtu). These factors when multiplied by 1865 MMBTU/hr result in VOC and PM10 maximum hourly emission permit conditions (limits) of 3.30 and 9.00 (pounds), respectively. The DAHS recorded hourly VOC and PM10 values of 9.05 and 3.32 (pounds), respectively.
8. Preventive or corrective action taken: The load (heat input) was lowered by the Operator below 1865 MMBTU/hr. [Authority to Construct (A/C) - application #25801 – with a new heat rate value of 2,200 MMBTU/hr will commence in the first quarter of 2019; Operator notification alarm values will be increased to this value. Tests on Unit 3 - A/C #25800

tentatively show a maximum limit of less than 2,200 MMBTU/hr.] Don Dumaine, Air Quality Specialist with SMAQMD, provided instruction on how this needed to be reported (indicating it was “not an exceedance”) and to await his feedback regarding allowing use of source test emission factors as the exceedance determinate (vs. utilization of the default permit factors in the DAHS). The facility’s 4<sup>th</sup> quarter report will include source test(ed) results for VOC and PM10 emissions factors which show 3-year averages of 0.00033 and 0.0019, respectively. The District’s El Calc Policy 20170131 states “the latest source test emission factor, if available” is the first choice for emission calculation.

## Attachment B.2

Quarterly CTG cumulative emissions: Records of NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10</sub>. Combined emissions of both gas turbine generators, perlite storage silo dust and cooling tower (PM-10) – as permitted in Title V Permit No. TV2012-19-01 (see ATC comments below).

### Annual Cumulative Emissions 2018

\*Yearly limit values changed to tons/year in the ATC issued December 10, 2018

#SO<sub>2</sub> Quarterly limit values changed in the ATC issued December 10, 2018

#### Carbon Monoxide (CO) pounds

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit
Jan	5537	5537	147,929	5537	123.1*
Feb	4708	10245		10245	
Mar	5674	15919		15919	
Apr	0	0	148,687	15919	
May	822	822		16741	
Jun	1953	2775		18694	
Jul	1827	1827	149,444	20521	
Aug	2496	4323		23017	
Sep	1246	5569		24263	
Oct	1584	1584	149,444	25847	
Nov	1559	3143		27406	
Dec	3918	7061		31324	

#### Oxides of Nitrogen (NO<sub>x</sub>) pounds

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit
Jan	15660	15660	62,021	15660	96.0*
Feb	14141	29801		29801	
Mar	13890	43691		43691	
Apr	0	0	62,643	43691	
May	1276	1276		44967	
Jun	14067	15343		59034	
Jul	14836	14836	63,265	73870	
Aug	14569	29405		88439	
Sep	14689	44094		103128	
Oct	14638	14638	63,265	117766	
Nov	15596	30234		133362	
Dec	15067	45301		148429	

**Particulate Matter (PM-10) pounds (no Perlite PM for 2018)**

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit	
Jan	13157	13157		13157		
Feb	11738	24895		39,725		24895
Mar	11047	35942				35942
Apr	0	0	40,167			35942
May	966	966		36908		
Jun	11587	12556		48495		
Jul	12154	12154	40,608	60649		
Aug	11862	24016		72511		
Sep	12070	36086		84581		
Oct	11973	11973	40,608	96554		
Nov	12711	24684		109265		
Dec	11485	36169		120750		80.6*

**Volatile Organic Compounds (VOC) pounds**

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit	
Jan	4681	4681		4681		
Feb	4180	8861		14,807		8861
Mar	3899	12760				12760
Apr	0	0	14,958			12760
May	360	360		13120		
Jun	4122	4482		17242		
Jul	4319	4319	15,110	21561		
Aug	4205	8524		25766		
Sep	4313	12837		30079		
Oct	3934	3934	15,110	34013		
Nov	4191	8125		38204		
Dec	3971	12096		42175		30.0*

**Oxides of Sulfur (SO2) pounds**

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit
Jan	1589	1589	8,252#	1589	16.7*
Feb	1417	3006		3006	
Mar	1326	4332		4332	
Apr	0	0	8,342#	4332	
May	115	115		4447	
Jun	1394	1509		5841	
Jul	1464	1464	8,434#	7,305	
Aug	1426	2890		8731	
Sep	1462	4352		10193	
Oct	1448	1448	8,434#	11641	
Nov	1539	2987		13180	
Dec	1463	4450		14643	

## **Attachment C**

### **Bio-19 Giant Garter Snake Habitat**

An agreement was executed by SMUD on June 4, 2003 for the purchase of 41.5 acres of GGS mitigation habitat from Wildlands, Inc. for \$1,245,000. The payment was made October 3, 2003. The USFWS had previously determined that GGS habitat only occurs west of the Folsom-South Canal and does not include the Cosumnes Power Plant. Gas pipeline construction was complete in fall 2004, and successful revegetation of the pipeline corridor was documented in the pipeline final biological report previously submitted to the CEC. The first annual compliance report contains this summary for completeness.

## Attachment D

### Bio – 2: Biological Activities Summary

In 2018 the Workers Environmental Awareness Program (WEAP) continued to be implemented.

There was one California tiger salamander (CTS) occurrence at the Cosumnes Power Plant (CPP) between January 1, 2018 and December 31, 2018. On March 16, 2018 one CTS (photo below) was found deceased on the northeast corner of the property and appeared to have been run over by a golf cart. The SMUD Biologist, Emily Bacchini, contacted both USFWS and CDFW. In her email to you on March 20 she stated previously mentioning SMUD is working on a Habitat Conservation Plan (HCP) that will provide take coverage for this species and that SMUD is planning to install a barrier fence around the plant as part of the HCP to help prevent CTS from ending up on the plant. No other CTS were encountered in 2018.



In 2017 the Workers Environmental Awareness Program (WEAP) continued to be implemented.

In 2016 the Workers Environmental Awareness Program (WEAP) continued to be implemented.

In 2015 the Workers Environmental Awareness Program (WEAP) was updated.

From 2010 to 2015 the Workers Environmental Awareness Program (WEAP) continued to be implemented.

In 2009 the Workers Environmental Awareness Program (WEAP) was updated.

The following was reported in the 2008 CEC Annual Compliance Report for CPP with regard to the Cosumnes Power Plant Revegetation Monitoring Report of 2007-2008:

“The second year of a two-year vegetation survey of the batch plant lay down area, and water line was performed in spring 2008. The percentage of ground cover and overall species diversity has significantly increased in all three areas since 2004. Following the initial revegetation efforts in 2004, percent cover at the batch plant site was between 20 percent (on the eastern portion), and 70 percent (in the northern area). In 2008, vegetative cover across the entire site was over 90 percent with species composition similar to that observed in adjacent grassland habitats. Likewise, vegetation within the water line area has increased from an estimated 5 to 20 percent total cover in 2004 to over 90-95 percent cover and a diverse range of plant species. The lay down area was not surveyed in 2004 but currently has vegetation ground cover greater than 95 percent.

The CPP Biological Resources Post-construction Compliance Monitoring Report (December 2006) summarized 9 California Tiger Salamander (CTS) sightings from June 2005 to February 2007. A single sighting of a CTS occurred on January 10, 2008. This individual required relocation and the U.S. Fish and Wildlife Service (USFWS) were notified for approval to relocate this individual. Relocation was successful and post-relocation information was provided to the USFWS.

Four California tiger salamander (CTS) occurrences were documented at the Cosumnes Power Plant (CPP) between January 22, 2009 and February 17, 2009. Two individual CTS required relocation and the U.S. Fish and Wildlife Service (USFWS) was notified for approval to relocate this individual. Relocation was successful and post-relocation information was provided to the USFWS. Two individual CTS were found dead on the site and the USFWS was notified of the mortalities. No modifications to mitigation measures were required for post-construction activities of CPP.

## **Attachment E**

### **Bio – 5: Report of Mitigation implementation**

- There was no update made to the revegetation for CPP.

## Attachment F

### Haz – 1 Cosumnes Power Plant Chemical Inventory – 2018

Chemical	CAS #	Quantity on site	Location
Aqueous Ammonia	1336-21-6	18,000 gallons	North side of facility
Hydrogen	1333-74-0	40,000 cubic feet	CT #2,3 and trailer
Oxygen	7782-44-7	2,000 cubic feet	Maintenance Building
Acetylene	74-86-2	2,000 cubic feet	Maintenance Building
Argon	7440-37-1	2,000 cubic feet	Maintenance Building
Nitrogen	7727-37-9	20,000 cubic feet	CEMS Shelters/HRSGs
Carbon Dioxide	124-38-9	15.75 tons	CT #2,3 and West side
Sulfuric Acid	7664-93-9	6,000 gallons	Cooling tower / ZLD / Batteries
CEMS Calibration Gas	7727-37-9	2,000 cubic feet	CEMS Shelters
Sodium Hypochlorite	7681-52-9	6,530 gallons	Cooling Tower, Water Treatment
FloGard MS6222	7320-34-5	1000 gallons	Cooling Tower
Spectrus NX 1100	Various	600 gallons	Cooling Tower
DeposiTrol BL6502	2809-21-4	1000 gallons	Cooling Tower
Spectrus OX 1201	7647-15-6	540 gallons	Cooling Tower
Corrshield NT 4200	Various	110 gallons	Closed Cooling Water Loop
Sodium Sulfate	7757-82-6	6,000 gallons	ZLD
Calcium Chloride	10043-52-4	6,600 gallons	ZLD
Sodium Hydroxide	001310-73-2	800 gallons	ZLD
Hypersperse MDC700	None	110 gallons	Water Treatment Building
Foamtrol AF1740	64741-44-2	300 gallons	ZLD
Optisperse HP 3100	1310-73-2	550 gallons	Water Treatment Building
Steamate NA8590	144-43-5	1,015 gallons	Water Treatment Building
Lubricating Oil	64742-65-0	25,000 gallons	Throughout site equipment
Mineral Insulating Oil	64742-46-7	60,000 gallons	Contained in transformers
Conntect 6000	Various	275 gallons	Water Wash Skid / Storage
Gasoline	8006-61-9	110 gallons	Fuel Storage Area
Diesel	68476-34-6	350 gallons	Fuel Storage Area
Propane	74-98-6	100 gallons	Haz Material Storage Building
Paint	Various	25 gallons	Maintenance Building
Solisep MPT134	12042-91-0	110 gallons	Water Treatment Building
Calcium Sulfate Dihydrate	13397-24-5	8,500 pounds	ZLD
Sodium Bisulfite		110 gallons	Water Treatment Building
Perlite	93763-70-3	7.1 tons	Candle Filter System

## Attachment G

### Water Quality – 7 ZLD Status Report

The Zero Liquid Discharge (ZLD) system was operated continuously throughout 2018 while the plant was on line. For operating year 2018, availability of the ZLD system was 85% and was operating for 49% of the year. Routine maintenance and cleaning was performed throughout the year.

- Blow down waste water from the cooling tower is stored in two 850,000-gallon tanks located on the site property as part of the ZLD continuous waste water process. No other interim wastewater stream is stored on site.
- Throughout the year the ZLD is actively monitored and maintained. A proactive approach to ZLD maintenance is used and that allows CPP to have high ZLD performance and availability. Below is a list of maintenance completed throughout 2018.
  - Performed monthly- filter press inspection and repaired
  - Performed monthly-BC-Feed Tank PH calibration
  - Performed monthly -vibration analyses for all rotating equipment
  - Performed monthly-spin down impeller washes
  - Performed once per shift- on-line impeller washes
  - Performed Semi Annually- Replace all camlock gasket connections
  - Performed Semi Annually- Cleaned DA saddles
  - Performed Daily-chemistry/rounds are collected
  - Semi-Annual change oil for all chemical injection pumps
  - Semi- Annual Hydro blasted ZLD evaporator, Replaced Demister Pads, Replaced DA saddles
  - Periodic –Replaced filter press belts
  - Semi-Annual Flood box cleaning
  - Replaced BC Feed Tank pH probe
  - Repaired steam leak at vapor compressor discharge expansion joint.
  - Repaired sulfuric acid containment coating
  - Replaced distillate pump mechanical seal
  - Replaced brine blow down tank Aux steam nozzle

#### Disposal:

277 tons of ZLD salt cake was land-filled during 2018 under Cal EPA Waste Generator ID# CAL000312069.

- All non-hazardous ZLD salt cake was land-filled during 2018 to Altamont Landfill

UNIVAR USA Inc. provides waste disposal services for Cosumnes Power Plant.

See Appendix B for list of Vacuum Truck loads for 2018 of water and sludge disposal.

Landfill utilized for ZLD salt cake disposal and sludge disposal:

- Altamont Landfill  
10840 Altamont Pass Road  
Livermore, CA 94550

- See Appendix A for the 2017-2018 Annual Report for Discharges of Storm Water Associated with Industrial Activity.

## Attachment H

### Water Res – 1 Water use Summary

Cosumnes Power Plant 2018 total water usage was 2,069.1 acre feet and a three year average of 2,131.7 acre feet. This is less than the 3 year average maximum allowable usage of 2,663 acre feet.

2006 to 2018 Monthly Water Usage for Cosumnes Power Plant in Acre Feet.

CPP Water Use														
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	
January	72.2	181.1	163.1	176.3	179.2	161.2	191.6	185.2	195.9	187.33	195.1	174.1	191.7	
February	94.7	156.0	174.1	172.2	177.9	157.2	178.7	166.6	166.9	172.97	191.1	141.1	174.9	
March	145.1	181.4	183.5	126.0	198.6	173.1	154.7	188.0	202.6	175.27	176.8	167.6	171.3	
April	90.7	171.2	170.0	145.7	190.0	109.0	116.9	55.8	202.6	124.52	84.2	60.2	14.0	
May	109.7	189.5	202.9	171.2	106.2	96.3	193.7	200.4	196.0	218.2	170.1	148.7	50.6	
June	124.7	227.0	222.1	145.0	125.8	143.0	213.4	222.3	227.9	236.15	214.4	151.4	213.3	
July	220.8	214.2	226.6	237.3	226.4	199.3	218.1	225.8	242.3	225.87	229.7	220.8	233.2	
August	219.4	242.4	245.3	236.2	220.6	228.2	233.7	225.8	231.8	240.36	235.3	229.1	220.0	
September	208.5	197.6	218.2	231.2	234.0	224.8	223.7	218.9	224.8	235.9	226.7	201.4	222.1	
October	186.3	145.0	223.3	119.7	221.7	206.4	206.4	206.5	221.1	226.36	196	207.3	206.2	
November	118.1	166.4	101.6	192.8	180.7	173.6	104.2	156.3	84.2	139.7	192.8	138.3	195.8	
December	174.4	180.5	182.1	175.3	174.0	183.9	144.8	187.8	190.2	191.59	187.3	186.6	176.0	
<b>Yearly Total</b>	<b>1,764.5</b>	<b>2,252.2</b>	<b>2,312.7</b>	<b>2,128.9</b>	<b>2,235.1</b>	<b>2,056.0</b>	<b>2,179.9</b>	<b>2,239.4</b>	<b>2,386.4</b>	<b>2,374.2</b>	<b>2,299.5</b>	<b>2,026.6</b>	<b>2,069.1</b>	
<b>Last Three Years' Average</b>			2,131.7	Acre Feet Per Year.										

## **Attachment I**

### **COM -7 Conditions**

**7.1 – Compliance Matrix provided in Attachment J of this report.**

**7.2 – Summary of the current project operating status and an explanation of any significant changes to facility operations during the year.**

- CPP is currently operational, however it is undergoing a Major outage. During 2018 there was an Advanced Gas Path improvement, and, a CO catalyst was installed - both on Unit 3 resulting in an increase of electrical output by approximately 34 megawatts and a decrease in CO emissions.
- On February 12, 2018, a team of five CEC employees (including the CPM) performed a random, operational site visit/inspection. CPP staff were informed the site looked great and that there were no findings.
- On April 9, 2018, CEC Staff Safety Professionals came to the site to review an active Lock Out Tag Out.
- On April 23, 2018 the CEC CPM and CBO came to the site for review and inspections.

**7.3 – Documents required by specific conditions to be submitted along with the Annual Compliance Report.**

- Required documents contained in this 2018 Annual Compliance Report.

**7.4 – Cumulative listing of all post-certification changes approved by the Energy Commissions or cleared by the CPM.**

- 2007, Cooling Tower TDS Limit Change Approval.
- On April 16 2009, CPM Approval of Modification to Upgrade the ZLD System and, Approval for Installation of a One Pass Filtration System.
- On June 20, 2011 CPM issued Staff Analysis of Proposed Modifications for Fuel Supply Modification.
- On August 8, 2011 CPM issued Revised Staff Analysis of Proposed Modifications for Fuel Supply Modification.
- On October 17, 2011, CPM approved (via email) new chemicals for HAZ1 submitted on 9-9-2011.
- On November 2, 2011 CEC approved Order No. 11-1102-5: a petition to modify the fuel supply and other modifications to the SMUD Cosumnes Power Project, in the matter of docket no. 01-AFC-19C.
- On November 17, 2011 CPM issued Notice of Decision by the CEC regarding Docket 01-AFC-19C.
- On January 8, 2018 Compliance Office Manager approved the upgraded turbine and emission control system components as part of a scheduled maintenance event indicating the activities do not require filing of a post-certification amendment.
- On August 29, 2018 CEC accepted and posted Cosumnes Power Plant's Petition to Amend to increase Electrical Production in the matter of docket no. 01-AFC-19C.
- On December 10, 2018 CEC approved order 18-1210-4: a petition to amend the facility license in the matter of docket no. 01-AFC-19C.

**7.5 – Explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided.**

- No submittal deadlines were missed for 2018.

**7.6 – Listing of filings made to, or permits issued by, other governmental agencies during the year.**

- On February 14, 2018 CPP submitted annual VPP STAR renewal report to CalOSHA consultation.
- On March 7, 2018 SMUD deducts 8 tons of SO<sub>2</sub> allocations in US EPA's CAMD.
- On March 26, 2018 CPP submitted annual GHG emissions data to the US EPA through e-GGRT.
- On March 29, 2018 CPP submitted HMP annual renewal to Sac EMD.
- On March 29, 2018 CPP submitted above ground storage tank facility statement to Sac EMD.
- On April 6, 2018 SMAQMD issued ATC #'s 25510, 25511, 25634 and 25635: performance modifications to the turbines, reduction of yearly NO<sub>X</sub> and CO facility limit and installation of a CO catalyst. The ATC expires April 6, 2020.
- On May 31, 2018 CPP notified SMAQMD of the completion of Unit 3's performance modification and installation of CO catalyst as per ATC #25510.
- On June 5, 2018 SMUD submitted to SMAQMD, an application for significant modification to the Title V permit proposing to: Upgrade the Gas Turbine with Advanced Gas Path (AGP), Utilization of Unit 3's modified equipment, and, to perform AGP construction on Unit 2.
- On June 13, 2018 SMUD notified CPP that SMAQMD gave permission to utilize AGP up to the heat limit of 1865 mmbtu/hr.
- On July 2, 2018 the 2017 to 2018 annual storm water report was submitted to the California State Water Control Board by CPP.
- On July 13, 2018 SMUD received notification that CPP's 2017 GHG emissions data, submitted to California ARB, received an "unqualified positive verification statement" from an independent verifier.
- On July 26, 2018 CPP submitted the 2017 Emissions Statement Certification to SMAQMD.
- On October 30, 2018 CPP submitted an increase in the calcium chloride tank size to Sac EMD.
- On December 10, 2018 SMAQMD issued ATC #'s 25510, 25511, 25634 and 25635: performance modifications to the turbines, reduction of yearly NO<sub>X</sub> and CO facility limit and installation of a CO catalyst. The ATC expires December 10, 2020.

**7.7 – Projection of project compliance activities scheduled during the next year.**

- The 2018 Title V Certification Report in January 2019.
- Title V Semi-Annual Monitoring Report in January 2019 for July to December 2018.
- Annual RATA and Compliance Source testing March 26 – March 27, 2019.
- Quarterly Calibration Gas Audits (CGAs) of the CO analyzers.
- Quarterly linearity's of the NO<sub>X</sub> and O<sub>2</sub> analyzers.
- Quarterly electronic data reports (EDR) to the EPA.
- Annual GHG Reporting – March 2019.
- SMAQMD Emissions Inventory report in March 2019.
- Fuel Flow Meter Transmitter Calibrations – 1st Quarter 2019.
- Hazardous Material Plan annual review in April 2019.
- 2018-2019 Annual Report for Storm Water Discharges Associated with Industrial Activities to be submitted by July 15th, 2019.
- Title V Semi-Annual Monitoring Report in July 2019 for January to June 2019.

- Renewal of Title V, PTO NO TV2012-19-01 in 2019.
- Title V Semi-Annual Monitoring Report in January 2020 for July to December 2019.
- The 2019 Title V Certification Report in January 2020.

**7.8 – Listing of the year’s additions to the on-site compliance file.**

- There were no listings of additions to the on-site compliance file.

**7.9 – Evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date.**

- The plan is up to date and there are no new recommendations.

**7.10 – Listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved complaints, and the status of any unresolved complaints.**

- On 12/27/17 DOSH filed a motion for continuance of the hearing (Inspection No. 1166972) due to the unavailability of a witness. On 1/3/18 Judge Reedy granted the continuance and instructed the Appeals board staff to contact the parties and reschedule.
- On 7/26/18 correspondence was received from DOSH indicating a 10/1/18 status conference with Judge Reedy. Judge Reedy set a hearing for 10/16/18 to 10/18/18.
- On 9/17/18 DOSH filed a motion for continuance of the hearing provided the new hearing date is scheduled in Spring of 2019 and provided ample notice time.
- On October 1, 2018 a status conference was conducted by telephone between Judge Reedy, and DOSH and Company attorneys. DOSH indicated they would follow up with a settlement proposal. Judge Reedy said he would grant DOSH’s motion to postpone (to April to June, 2019) the hearing after both parties reported on the settlement status.
- On October 5, 2018 DOSH made a settlement offer (declined), removing Citation 3-1 and reducing penalties by 75%.
- On November 30, 2018 DOSH requested Q1 Appeal Hearing dates.
- On December 20, 2018 CPP informed SMAQMD of PM and VOC deviations for a Unit 2 heat input exceeding 1865 MMBTU/hr. On February 20, 2019 SMAQMD indicated they would be issuing a Notice of Violation.

# **Attachment J**

## **2018 Cosumnes Power Plant CEC Compliance Matrix**

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
		License obtained				09/17/03								
		Mobilization				09/17/03								
		Start of construction (rough grading & pipeline)				10/09/03								
		Start of construction (foundations)				11/01/03								
		Start of construction (balance of plant)				12/01/03								
		Start of construction (pipeline)				05/03/04								
		Gas pipeline commissioning (purge and fill)				10/12/04								
		Energize transmission lines (backfeed)				05/09/05								
		First CTG firing				10/22/05								
		First steam blow				11/14/05								
		Commercial operation (power to grid; 80%)				03/08/06								
		Project completion				03/08/06								
Air Quality	AQ-SC6	Submit any proposed air permit modification to the CPM	CEC - CPM	5 (as needed)	Within 5 working days of proposed modification	as needed	as needed	SMUD Financing Authority submitted a renewal and ATC applications to SMAQMD for TV2012-19-01 and AC 25510 on 10/23/2017		TV Permit Issued: December 24, 2013	as needed		EE PPS	as needed
Air Quality	AQ-SC6	The project owner shall submit all modified air permits to the CPM within 15 days of receipt	CEC-CPM	15	15 Days after receipt	as needed	as needed	SMUD Financing Authority submitted notification that the EPA and SMAQMD revised TV2012-19-01, and, 16012, 13, 22673, 74 on 2/26/2014 & 7/6/2014 respectively, on 2/18/15 CEC approved ATC while processing PTA on 12/10/18	12/10/18	ATC emailed to CPM on 2/27/19	as needed		EE PPS	as needed

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-1	Submit quarterly and annual reports as required in condition AQ-34	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-3	Submit quarterly and annual compliance summary reports as required in condition AQ-34	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-4	A legible copy of this permit shall be maintained on the premises with the equipment	SMAQMD and CEC - CPM		All times			Complete			IP	Copy of permit at CPP	EE PPS	
Air Quality	AQ-5	Submit quarterly and annual compliance summary reports as required in condition AQ-34	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-16	The equipment shall not discharge into the atmosphere any visible air contaminant other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour, which is Ringelmann No. 1 or greater. Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19		No Visual Emissions Observed	IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-17	Emissions from the [tabulated] equipment shall not exceed the [tabulated] limits (including 3-hour Bag house limit from the Title V "TV" PTO) not including periods containing start-ups and short-term excursions as defined in condition AQ-26 (see COC). Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011 revised	See section B.1 for explanation of Unit 2 PM10 and VOC lb/hr 12/19/18 deviations	IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-18	Emissions of Nox, CO, VOC, Sox, and PM-10 from Phase 1 of the CPP facility including start-ups and shut-downs shall not exceed the [tabulated] limits (see COC). Emissions of daily Bag House (TV PTO) and Cooling tower shall not exceed the [tabulated] limits. Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-19	Emissions of Nox, CO, VOC, Sox, and PM-10 from Phase 1 of the CPP facility including start-ups and shut-downs shall not exceed the [tabulated] limits (see COC). [Including Bag house per the TV PTO.] Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-20	Each combined cycle combustion turbine shall not emit more than 2.0 ppmvd Nox at 15% O2, averaged over any one hour period, excluding periods containing start-ups/shut-downs and short term excursions as defined in condition AQ-26. Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-21	Each combined cycle combustion turbine shall not emit more than 4.0 ppmvd CO at 15% O2, averaged over any consecutive three hour period, excluding periods containing start-ups/shut-downs as defined in condition AQ-26. Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-22	Each combined cycle combustion turbine shall not emit more than 1.4 ppmvd VOC at 15% O2, averaged over any consecutive three hour period, excluding periods containing start-ups/shut-downs as defined in condition AQ-26. Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-23	Each combined cycle combustion turbine shall not emit more than 10 ppmvd ammonia at 15% O2, measured as NH3, averaged over any consecutive three hour period, excluding periods containing start-ups/shut-downs as defined in condition AQ-26. Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-24	The total dissolved solids content of the circulating cooling water shall not exceed 1,500 ppmw, averaged over any consecutive three-hour period. Include information on the date, time, and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-25	Each combined cycle turbine shall not be operated without a functioning selective catalytic reduction air pollution control system, excluding periods of start-ups and shut-downs. Include information on the date, time, and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-26	The duration of each combined cycle turbine's start-up period shall not exceed 180 minutes (see condition for extensive time period definitions). The maximum 1-hour average Nox concentration for periods that include short-term excursions shall not exceed 30 ppmvd at 15% O2. Include date, time, and duration of any violation of this condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-27	The cooling towers shall not use any chromium-containing water treatment chemicals. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual operating compliance reports	EE PPS	monthly
Air Quality	AQ-28	Cooling Tower drift rate shall not exceed 0.0005%						Original design of mist eliminators are in service. No design changes.			IP		EE PPS	
Air Quality	AQ-33	Records shall be continuously maintained on site for the most recent five-year period and shall be made available to the APCO upon request (see COC table).	maintained on site	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011 revised		IP	Develop quarterly and annual reports	EE PPS	quarterly and annually
Air Quality	AQ-34	Submit to SMAQMD and CPM, quarterly reports based upon table in the condition – includes emissions of daily (and 3-hour) Bag House (TV PTO) and Cooling tower. The report for the fourth quarter can be an annual compliance summary for the preceding year.	SMAQMD - APCO CEC - CPM	A. quarterly B. annually	Provide emissions data to APCO and CPM on quarterly basis due by 30th day following the end of the calendar quarter	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19			IP	Develop quarterly and annual reports	EE PPS	quarterly and annually

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-35	Submit annual NOX, VOC, CO, PM 10, ammonia and CEM accuracy source test plan (VOC and PM 10 may be waived by APCO)	SMAQMD - APCO CEC - CPM	30 (before)	Submit test plan to APCO 30 days prior to performance of annual source test	annual operating compliance report	annual operating compliance report	1/16/18			IP	Develop source test plan	EE PPS	annually
Air Quality	AQ-36	Notify APCO prior to annual emission testing date	SMAQMD - APCO CEC - CPM	7 (before)	Notify APCO 7 days prior to performance of annual source test	annual operating compliance report	annual operating compliance report	2/15/18	11-2-2011 revised		IP	Develop notification letter	SMUD and EE PPS	annually
Air Quality	AQ-36	Submit annual source test results to APCO	SMAQMD - APCO CEC - CPM	60 (after)	Submit source test results to APCO within 60 days after completion of annual source test	annual operating compliance report	annual operating compliance report	04/2/18	11-2-2011 revised		IP	Submit annual source test	SMUD and EE PPS	annually
Air Quality	AQ-43	SMUD shall ensure that the paved roads described in SMAQMD ERC applications 00767- 00769, 00772-0075 are properly maintained and repaired for the life of the CPP. Provide pictures in annual compliance report.	SMAQMD - APCO CEC - CPM	annually	Annually	annual operating compliance report	annual operating compliance report	02/27/18 Annual Compliance Report			IP	Take pictures for annual report	SMUD and EE PPS	annually
Air Quality	AQ-44	Digester gas used is restricted to 2,500 scfm and shall not commence until approval of the Acid Rain Program Petition. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-45	Digester gas used shall not exceed 50ppm of H2S, measured prior to the commingling with the natural gas. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-46	Perlite Storage Silo and attached APC Dust Collector Cyclonaire shall not discharge into the atmosphere any visible air contaminants for a period or periods aggregating more than three minutes in any one hour, which are as dark or darker than ringelmann no. 1 or equivalent to or greater than 20% opacity. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011	No Visual Emissions Observed	IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-47	The emissions from the Dust Collector shall not exceed 2.6 lb/quarter of PM10 based on maximum capacity 26hour/qtr, and particulate emissions of 0.02gr/dscf at 585 cfm. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-48	The Dust Collector shall be equipped with a pressure drop across the bags. The average pressure drop shall not exceed the manufacturer's recommendation. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-49	The Dust Collector cleaning frequency and duration shall follow the manufacturer's recommendation. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-50	Total perlite delivered to the silo per quarter cannot exceed 101.4tons. Include information on the date, time and duration of any violation of this permit condition.	CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-51	Records shall be continuously maintained on site for the most recent five-year period and shall be made available to the APCO upon request (see COC table).	maintained on site	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2018 Report 4/19/18 Q2 2018 Report 7/23/18 Q3 2018 Report 10/24/18 Q4 2018 Report 1/18/19	11-2-2011		IP	Develop quarterly and annual reports	EE PPS	quarterly and annually
Biology	BIO-2	Submit biology record summaries in Annual Compliance Report	CEC - CPM	annually	Submit annually during operation	annual operating compliance report	annual operating compliance report	02/27/19 Annual Compliance Report			IP	Develop biologist annual reporting format	SMUD	annually
Biology	BIO-4	Signed Statements for active personnel shall be kept on file for six months, following the termination of the individual's employment	CEC - CPM	annually	Submit annually during operation	annual operating compliance report	annual operating compliance report	02/27/19 Annual Compliance Report			IP	First Report in November	SMUD	annually

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Cultural	CUL-5	Worker Environmental Awareness Program (WEAP) training shall be provided.	CEC - CPM	on going	as needed			on going			IP		EE PPS	as needed
Hazardous Materials Management	HAZ-1	Provide a list of hazardous materials contained at the facility in reportable quantities	CEC - CPM	annually	Provide in annual compliance report	annual operating compliance report	annual operating compliance report	02/27/19 Annual Compliance Report	6-22-2016		IP	Develop a list of hazardous materials (see Appendix B)	EE PPS	annually
Noise	NOISE-2	File a copy of the noise complaint resolution form with the local jurisdiction (Sacramento County) and the CPM.	CEC - CPM Sacramento County City of Elk Grove	5 (after, as needed)	Within 5 days of receiving noise complaint	as needed	as needed	2006 Annual Report			as needed	Prepare form as needed	SMUD and EE PPS	as needed
Visual Resources	VIS-2	Status Report regarding treatment maintenance	CEC - CPM	30	Provide in annual compliance report	03/08/06	02/06/06	1/12/06 (CPP06-010) to J. Scott		inspection took place on 2/24/06	C -but report	Verify plant is ready for inspection per color plan	SMUD and EE PPS	annually
Visual Resources	VIS-5	Submit for CPM review and comment, written documentation describing the lighting control measures and fixtures, hoods, shields proposed for use.	CEC - CPM	A. 60 B. 30 C. annually	Report lighting complaints and resolution annually during operation	12/01/03	10/02/03	Change to LED request: 2/22/16 to M. Dyas	2/22/16 by e-mail from M Dyas and D. Flores staff.	No lighting complaints in 2018	C- but report	Develop exterior operational lighting treatment plan	SMUD	Annual report of complaints
Waste Management	WASTE-1	Project owner to obtain from the Department of Toxic Substances Control a hazardous waste generator identification number.	Sacramento County EMD	as needed	as generated			annual		CAL00031 2069			EE PPS	as needed
Waste Management	WASTE-2	Notify upon becoming aware of impending enforcement action related to hazardous waste	CEC - CPM Jurisdiction	10 (after)	Notify within 10 days of impending enforcement action	as needed	as needed				as needed	Notify as needed	SMUD and EE PPS	as needed
Waste Management	WASTE-3	Document the actual waste management methods used during the year compared to planned management methods	CEC - CPM Sacramento County	30	Provide in annual compliance report	03/08/06	02/06/06	1/5/06 (CPP06-1350) to J. Scott & E. Rothschild	1/17/06 "no comments" Ryan at Sac County EMD		C- but report	Develop operation waste stream plan	EE PPS	annually
Waste Management	WASTE-5	Submit reports filed by registered professional engineer or geologist if contaminated soil is unearthed	CEC - CPM	5 (after, as needed) within 24 hrs (as needed)	Submit 5 days after report is received for remediation of contaminated soils. Notify CPM within 24 hours of orders to halt construction.	as needed	as needed	As Required			as needed	Develop reports as needed	SMUD	as needed

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Waste Management	WASTE-6	Notify of ZLD salt cake test results and planned disposal method, or any substantive change in the treatment process	CEC - CPM	30 days if change	After initial generation of salt cake	03/08/06	04/07/06	4/26/06 e-mail to J. Scott			IP	Test salt cake and determine disposal	EE PPS	as needed
Water & Soil Resources	WATER QUALITY-7	Submit results of the Waste Extraction Test of the residual cake solid waste from the ZLD. Submit status report in annual compliance report. Submit annual monitoring report for stormwater as normally submitted to the CVRWQCB under NPDES Permit for Discharges of Storm water.	CEC - CPM	annually	Annually	04/07/06	03/31/06	3/1/07 First annual Compliance Report		See Attachment G, Appendix A and Appendix B	IP	Report in annual compliance report	SMUD and EE PPS	Annually
Water & Soil Resources	WATER RES.-1	Total water use for CPP and landscape irrigation shall not exceed annual average of 2,663 AFY over any three successive calendar years. Maintain daily records and notify CPM immediately if peak flow is exceeded.	CEC - CPM	annually	Notify CPM if peak flow is exceeded.	annual operating compliance report	annual operating compliance report	02/27/19 Annual Compliance Report	11-2-2011 revised	See Attachment H	IP	Report as needed	EE PPS	annually
General Conditions	COM-7	Prepare and submit an annual operating compliance report containing all 10 referenced elements	CEC - CPM	annually	Submit annually during operation	annual operating compliance report	annual operating compliance report	02/27/19 Annual Compliance Report		See Attachment I and J	IP	Prepare annual operating compliance report	SMUD and EE PPS	Annually

**Closed or completed conditions**

General Conditions	COM-2	Project owner shall maintain project files on-site or at an alternative site approved by the CPM, for the life of the project	CEC - CPM	Not specified	None - for information only	03/08/06	03/08/06	3/1/07 First annual Compliance Report			C	Designate filing area and maintain files	SMUD and WGPO	03/01/06
Noise	NOISE-5	Submit a summary report of noise survey to jurisdictions, to include any remedial actions necessary to achieve compliance	CEC - CPM Sacramento County City of Elk Grove	45 (after)	After post-construction noise survey, but within 30 days of 80 percent sustained output	03/08/06	04/22/06	(CPP06-102) May 2, 2006 hand delivered to J. Scott		Survey performed 2/22 and 2/23, re-test on 3/23 and 3/24	C	Perform area noise surveys	SMUD and WGPO	04/15/06
Noise	NOISE-7	Notify CPM within one week of any noise survey requests received	CEC - CPM	7	Prior to commercial operation	03/08/06	03/08/06				C	Develop sound attenuation report	SMUD and WGPO	03/01/06

**2018 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
T-Line Safety & Nuisance	TLSN-3	Resolve complaints of radio or television signal interference	CEC - CPM	1 year (after)	Within 1 year, summarize complaints of interference	03/08/06	03/08/07	None in 2006			C	Resolve as-needed	SMUD and WGPO	annually
Water & Soil Resources	WATER QUALITY-9	Develop detention basin operations and maintenance plan	CEC - CPM	60	Prior to operation	03/08/06	01/07/06	02/08/06 WGPO hand delivered to J. Scott			C	Prepare basin operations and maintenance plan prior to operation	WGPO	12/08/05
Visual Resources	VIS-2	Submit simulations, maintenance plan, and a proposed treatment plan for all project structures and buildings visible to the public at least 45 days prior to ordering the first structures that are color treated during manufacture.	CEC - CPM Sacramento County	45	Prior to ordering the first structures that are color treated during manufacture	09/17/03	08/03/03	1/29/03 4/10/03 (CPP03-157)	Verbal approval from G. Walker	in 2018 there were no structures and buildings surface treatments	C	Prepare plant visual simulations with various color choices and visual maintenance plan	SMUD and WGPO	07/27/03
Biology	BIO-19	Include status of mitigation measures in annual compliance reports	CEC - CPM	annually	Submit annually during operation	10/09/03	annual operating compliance report	3/1/09 Annual Compliance Report			C	prepare monthly compliance report	SMUD	annually
General Conditions	COM-11	Project owner must send a letter to property owners living within one mile of the project notifying them of a telephone number to contact project representatives with questions, complaints or concerns. Notify CPM and provide documentation of complaints, warnings, fines, etc.	CEC - CPM	A. 0 B. 10 (after)	A. Notification of neighbors prior to start of construction B. Notify CPM within 10 days of complaints	10/09/03	10/09/03	9/2/03 (CPP03-532) to J. Scott 1/21/04 (CPP04-042) Request for modification of Condition	09/08/03	Similar to Noise-1; issue one letter Approved	C	Prepare information to notify area residents prior to construction	SMUD and WGPO	Annually
Visible Plumes	PLUME-1	Submit to the CPM for review the final design specifications of the cooling tower related to plume formation. The project owner shall not order the cooling tower until notified by the CPM that the two design requirements have been satisfied.	CEC - CPM	30	Prior to ordering the cooling tower	09/17/03	03/21/03	12/26/02 6/30/03 (CPP03-328) to J. Scott	1/9/03 conditional 12/26/2003	Approved	C	Provide cooling tower specifications and design data		
General Conditions	COM-5	Compliance matrix format for 8 minimum identifiers. Conditions do not need to be included after they have been identified in at least one monthly or annual compliance report.	CEC - CPM	0	Submit and obtain approval of all pre-construction items		monthly construction compliance report	3/1/07 First annual Compliance Report			C	Monthly report	SMUD	annually

**Appendix A**  
**Annual Storm Water Discharge Report**



2017-2018  
**ANNUAL REPORT**  
FOR STORM WATER DISCHARGES  
ASSOCIATED WITH INDUSTRIAL ACTIVITIES

Reporting Period July 1, 2017 through June 30, 2018

**Retain a copy of the completed Annual Report for your records.**

Please remember that a Notice of Termination and new Notice of Intent are required whenever a facility operation is relocated or changes ownership.

If you have any questions, please contact your Regional Board Industrial Storm Water Permit Contact. The names, telephone numbers, and e-mail addresses of the Regional Board contacts, as well as the Regional Board office addresses, can be found at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/contact.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/contact.shtml)

**General Information**

**A. Facility Information**

WDID: 5S34I020075

Business Name: Cosumnes Power Plant

Physical Address: 14295 Clay East Rd

City: Herald

Contact Person: Dave Blevins

State: CA

Phone: 209-748-5177

Zip: 95638

Email: [dave.blevins@ethosenergygroup.com](mailto:dave.blevins@ethosenergygroup.com)

Standard Industrial Classification (SIC) Codes: 4911-Electric Services

**B. Facility Owner Information**

Business Name: Sacramento Municipal Utility District Financing

Mailing Address: PO Box 15830

City: Sacramento

Contact Person: Eric Poff

State: CA

Phone: 916-732-6227

Zip: 95852

Email: [Eric.Poff@SMUD.org](mailto:Eric.Poff@SMUD.org)

**C. Facility Billing Information**

Business Name: Ethos Energy Power Plant Services

Mailing Address: 14295A Clay East Road

City: Herald

Contact Person: Dave Blevins

State: CA

Phone: 209-748-5177 Ext: 302

Zip: 95638

Email: [dave.blevins@ethosenergygroup.com](mailto:dave.blevins@ethosenergygroup.com)

## Question Information

1. Has the Discharger conducted monthly visual observations (including authorized and unauthorized Non-Storm Water Discharges and Best Management Practices) in accordance with Section XI.A.1?

Yes  No

If No, see Attachment 1, Summary of Explanation.

2. Has the Discharger conducted sampling event visual observations at each discharge location where a sample was obtained in accordance with Section XI.A.2?

Yes  No

If No, see Attachment 1, Summary of Explanation.

3. Did you sample the required number of Qualifying Storm Events during the reporting year for all discharge locations, in accordance with Section XI.B?

Yes  No

If No, see Attachment 1, Summary of Explanation.

4. How many storm water discharge locations are at your facility?

1

5. Has the Discharger chosen to select Alternative Discharge Locations in accordance with Section XI.C.3?

Yes  No

6. Has the Discharger reduced the number of sampling locations within a drainage area in accordance with the Representative Sampling Reduction in Section XI.C.4?

Yes  No

7. Permitted facilities located within an impaired watershed must assess for potential pollutants that may be present in the facility's industrial storm water discharge. Using the table below, populated based on the facility's location, indicate the presence of the potential pollutant at the facility.

The facility is not located within an impaired HUC 10 watershed. You are not required to select any Industrial Pollutants. Skip Questions 8 and 9.

8. Has the Discharger included the above pollutants in the SWPPP pollutant source assessment and assessed the need for analytical monitoring for the pollutants?

Yes  No

If No, what date will the parameter(s) will be added to the SWPPP and Monitoring Implementation Plan?

9. Were all samples collected in accordance with Section XI.B.5?

Yes  No

If No, see Attachment 1, Summary of Explanation.

10. Has any contained storm water been discharged from the facility this reporting year?

Yes  No

If Yes, see Attachment 1, Summary of Explanation.

11. Has the Discharger conducted one (1) annual evaluation during the reporting year as required in Section XV?

Yes  No

If Yes, what date was the annual evaluation conducted? 06/04/2018

If No, see Attachment 1, Summary of Explanation.

12. Has the Discharger maintained records on-site for the reporting year in accordance with XXI.J.3?

Yes       No

If No, see Attachment 1, Summary of Explanation.

If your facility is subject to Effluent Limitation Guidelines in Attachment F of the Industrial General Permit, include your specific requirements as an attachment to the Annual Report (attach as file type: Supporting Documentation).

## ANNUAL REPORT CERTIFICATION

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

Printed Name: David Blevins

Title: Facility Manager

Date: 07/02/2018

## Annual Report for WDID 5S34I020075

## Summary of Explanations

Explanation Question	Explanation Text
Question 3	Our facility takes advantage of Sample Frequency Reduction and is only required to sample twice during the reporting year, once in the first half and once in the second. No samples were collected during the first half of the year because our storm water flows to a retention pond and rain events did not produce enough volume for our pond to discharge. Our facility collected our required one sample during the second half of the year in accordance with Sample Frequency Reduction.
Question 10	All storm water generated at the facility is directed into a detention basin fitted with a high-level drainage pipe and manually-operated valve. Within the reporting year, the detention basin has been opened during and after storm events depending on the water level. In the event that the valve is opened and/or storm water discharges from the basin, samples are collected in accordance with Section XI.B.5.

## Summary of Attachments

Attachment Type	Attachment Title	Description	Date Uploaded	Part Number	Attachment Hash
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2017-2018

**Annual Report for WDID 5S34I020075**

**List of Identified Pollutants within the Impaired Watershed**

Parameter	Pollutant	Present at Facility?
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## Appendix B

### Vacuum Truck Loads of Water or Sludge

Transport	Description of Material	Date removed to disposal facility	Manifest Number	Haz (RCRA) Cal Reg Non-Haz	Shipped To	Estimated Volume (GAL)	Actual Weight (tons)
Vacuum Truck	ZLD Sump	4/6/2018	18-16110-001	Non-Haz	Yolo	4800	19.01
Vacuum Truck	ZLD Sump	4/6/2018	18-16110-002	Non-Haz	Yolo	4800	18.80
Vacuum Truck	ZLD Sump	4/6/2018	18-16110-003	Non-Haz	Yolo	4800	19.90
Vacuum Truck	ZLD Sump	4/6/2018	18-16110-004	Non-Haz	Yolo	4800	17.81
Vacuum Truck	ZLD Sump	4/6/2018	18-16110-005	Non-Haz	Yolo	4800	19.94
Vacuum Truck	ZLD Sump	4/7/2018	18-16110-006	Non-Haz	Yolo	4500	15.88
Vacuum Truck	ZLD Sump	4/7/2018	18-16110-007	Non-Haz	Yolo	4800	20.55
Vacuum Truck	ZLD Sump	4/9/2018	18-16110-008	Non-Haz	Yolo	4800	21.12
Vacuum Truck	ZLD Sump	4/9/2018	18-16110-009	Non-Haz	Yolo	5000	21.27
Vacuum Truck	Wash Water	7/2/2018	18-16075-002	Non-Haz	EBMUD	4800	20.02
Vacuum Truck	Wash Water	10/4/2018	18-16075-003	Non-Haz	EBMUD	4800	20.02
Vacuum Truck	Wash Water	10/4/2018	18-16075-003	Non-Haz	EBMUD	4800	20.02
						<b>SUM</b>	<b>234.33</b>