

**DOCKETED**

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<b>Project Title:</b>	Mountainview Power Plant - Compliance
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<b>Description:</b>	N/A
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March 21, 2019

Joseph Douglas  
Compliance Project Manager  
California Energy Commission  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

**RE: GENERAL ORDER NO.1: ANNUAL COMPLIANCE REPORT, 2018  
MOUNTAINVIEW GENERATING STATION, Docket No. 00-AFC-2C**

Dear Mr. Douglas,

Attached is the 2018 Annual Compliance Report for Southern California Edison's Mountainview Generating Station.

The attached Summary addresses the compliance status with Mountainview's CEC license conditions and the enclosed CD contains all supporting documentation including the 2018 fourth quarter Air Quality reports.

If you have any questions regarding this report, please contact Julia Garner at (909) 478-1721, or by email at [Julia.Garner@sce.com](mailto:Julia.Garner@sce.com).

Sincerely,

A handwritten signature in blue ink that reads "Terry L. Maddox".

Terry L. Maddox  
Principal Manager, Generation-Eastern Operations

**Mountainview Generating Station  
CEC 00-AFC-02C  
2018 Annual Compliance Report**

This document is a summary of the 2018 CEC license compliance. Reports and supporting data are included on the enclosed CD.

**1. Compliance Matrix**

An updated compliance matrix is attached on the enclosed CD. The matrix also indicates where supporting documentation can be found on the CD.

**2. Summary of Current Operating Status/Significant Changes to Operations**

All units were in normal operation in 2018. There were no significant changes to operations in 2018.

**3. Documents Required by Conditions**

A complete list of documents required by specific conditions are listed in the compliance matrix on the enclosed CD. Applicable conditions are summarized below:

**Other Information Required by Specific Conditions**

2018 MAJOR PROJECTS

- There were no major projects in 2018 that affected any permits or licenses held by Mountainview Generating Station.

2019 PLANNED PROJECTS

- There are no major projects currently planned for 2019 that would affect any permits or licenses held by Mountainview Generating Station.

AIR QUALITY SOURCE TESTS

- AQ-2, 5, 6, 15, and 16: Annual RATA, CO spiking, and NH<sub>3</sub> slip tests were performed on units 3A, 3B, 4A and 4B in February 5-21. This also included additional testing required for the recertification on the NO<sub>x</sub> emissions analyzers that were installed in 2017. The test reports are on the enclosed CD under *Annual RATA and Compliance Testing* in the *Air Quality Reports* file.
- Initial CO compliance testing was required after the new CO catalyst installations in the modified SCAQMD permit issued September 29, 2017. This testing was completed March 26-27, 2018. The test reports are on the enclosed CD under *Annual RATA and Compliance Testing* in the *Air Quality Reports* file.

- AQ-14, 15, and 17: Triennial Air Quality Testing was not due in 2018.

#### AIR QUALITY COMPLIANCE

- AQ-11: There were three air quality permit emissions limits deviations in 2018.
  1. The hourly CO average limit was exceeded for one hour on 02/24/18 at 2400 hrs on unit 3A when an extraction valve that controls the air flow to the fuel system locked while moving load to minimum megawatt production. This caused high CO emission spikes until the unit was reset. The SCAQMD 500N report on this event is included on the enclosed CD under *2018 S1 500SAM* in *Other Annual Reports* in the *Air Quality Reports* folder.
  2. The NOx hourly cumulative startup emissions limit was exceeded for one hour on 05/07/2018 at 1500 hrs. Units 3B and 4A were scheduled to simultaneously cold start by CallSO. The combined startup emissions from both power blocks exceeded the cumulative emissions limit for NOx in the first hour of startup. The SCAQMD 500N report on this event is included on the enclosed CD under *2018 S1 500SAM* in *Other Annual Reports* in the *Air Quality Reports* folder. A Notice of Violation was issued for this event by the SCAQMD which is referenced in **Listing of Complaints, NOVs, Official Warnings, and Citations in 2018** of this report.
  3. The hourly NOx average emissions limit was exceeded on 06/15/18 for one hour on unit 4A at 0700 hrs. The SCR ammonia valve that controls NOx emissions failed. The SCAQMD 500N report on this event is included on the enclosed CD under *2018 S1 500SAM* in *Other Annual Reports* in the *Air Quality Reports* folder.
- AQ-28: The emergency diesel fire pump engine did not exceed the 199 hour/year limit in 2018. The operations log for this equipment is on the enclosed CD in the Q4 2018 Air Quality Reports Folder.
- AQ-33 and AQ-34: Cooling tower PM-10 records are on the accompanying CD in the Water Quality Folder which show that PM-10 was in compliance with conditions during 2018.

#### BIOLOGICAL RESOURCES

- BIO-2: No work impacting biological resources was performed during 2018.
- BIO-3: Southern California Edison has an Environmental Resource Management Division within the company that includes biologists for field support. Kara Donohue is a biologist within this department that works with Mountainview. Kara

completed the 2018 annual report for BIO-3 which is included on the enclosed CD and was previously submitted on 05/23/2018 to Carol Watson of the CEC.

- BIO-4: There were no potential non-compliant conditions which may have required notification in accordance with this condition.
- BIO-5: Biological Resources training is covered in Edison's annual Environmental Awareness module. Training records for employees are attached on the accompanying CD. Contractors must view an orientation video annually that reviews the safety, environmental, and biological procedures prior to work authorization being approved. These records are maintained on site.

#### HAZARDOUS MATERIALS

- HAZ-1: Chemicals stored on site in quantities at or above the Federal Reportable Quantity have not changed from the previous reports and are listed below.
  - Ammonium Hydroxide (19%)
  - Sulfuric Acid

Mountainview submits its Business Emergency/Contingency Plan and Hazardous Materials Inventory to our CUPA via the State CERS online reporting system. The downloaded hazardous materials inventory and BP are included on the CD in the HazMat and HazWaste folder.

#### NOISE

- NOISE-2: There were no complaints received in 2018 due to noise from the site or its operations.

#### TRANSMISSION LINE SAFETY & NUISANCE

- TLSN-2: There were no complaints received in 2018 of interference with radio or television signals from operation of the transmission line and related facilities.

#### VISUAL RESOURCES

- VIS-1: There have been no significant coating activities on structures or fences in 2018. The golf course north of the plant referenced in the original CEC document was replaced by warehouses and is no longer accessible to take pictures for this report. Warehouses also border the south and east side of the plant. Pictures from outside the plant property line are attached on the CD for your reference in the Site Pictures folder.

#### WASTE MANAGEMENT METHODS

- WASTE-3: There were no waste-management related enforcement actions in 2018.
- WASTE-4: Mountainview's waste management methods used during the year minimizes the number of chemicals we use, and promotes lower-hazard alternatives whenever possible. Recycling is used whenever possible. Domestic recycling bins are managed through the City of Redlands and metal recycling bins are managed by Alpert and Alpert. Hazardous Waste Disposal is overseen by a Southern California Edison group that specifically manages wastes and waste haul contractors. Universal, Non-Hazardous, Hazardous, and E-wastes are hauled by licensed contractors to approved destination facilities. Copies of waste manifests for 2018, which list the treatment/disposal codes, are included on the enclosed CD.

#### WATER RESOURCES

Reports pertaining to Water Quality and Water Resource conditions were previously submitted in a separate annual water report from Bruce MacKenzie.

#### **4. Listing of Post-Certification Changes Approved by CEC or Cleared by CPM**

None

#### **5. Environmental Regulatory Submittal Deadlines Missed**

No submittal deadlines were missed in 2018.

#### **6. Filings made or Permits Issued By Other Governmental Agencies**

Renewed Environmental Permits issued in 2018 are included on the enclosed CD in the Permit and Plan Updates folder.

#### **7. Compliance Activities Scheduled for 2019**

- Annual air compliance source testing for 2019 was completed February 4-6, 2019. This included NH<sub>3</sub> Slip tests, NO<sub>x</sub> RATA, CO RATA, and Visible Emissions Evaluations (VEE). All tests passed.
- The annual biologist inspection for the BIO-3 report is tentatively scheduled for July 2019.

#### **8. 2018 Additions to On-Site Compliance Files**

See documents included on the enclosed CD.

#### **9. Evaluation of On-Site Contingency Plan for Unexpected Facility Closure**

There have been no changes in 2018 to the Unexpected Facility Closure Plan that was updated and submitted in 2018. Any additional information can be provided upon request.

#### **10. Listing of Complaints, NOVs, Official Warnings, and Citations in 2018**

1. A Notice of Violation was issued on 05/17/2018 from the South Coast AQMD for failure to perform annual NH<sub>3</sub> Slip source tests in 2017. Annual source testing due in the fourth quarter of 2017 was not able to be completed due to the previously described forced outage that prevented the units from operating until 2018. South Coast AQMD General Counsel requested additional information on this event which was provided on 08/27/2018. There has been no further correspondence from the SCAQMD as of the date of this report. Associated documents are located on the enclosed CD in the Violations folder.
2. A Notice of Violation was issued on 05/17/2018 for exceedance of NO<sub>x</sub> hourly cumulative startup emissions limit for one hour on 05/07/2018. South Coast AQMD General Counsel requested additional information on this event which was provided on 08/27/2018. There have been no further correspondence from the SCAQMD as of the date of this report. Associated documents are located on the enclosed CD in the Violations folder.

**Mountainview Generating Station (00-AFC-02C)  
CEC Conditions Compliance List**

<b>CEC Condition Number</b>	<b>Description of Condition Requiring Data Submission (refer to Final Decision for complete language)</b>	<b>Verification</b>	<b>Attachments</b>
<b>AQ-1c</b>	Gas Turbines are subject to requirements of 40CFR 60, Subpart GG	Semi-Annual EPA Subpart GG Reports	Air Quality/Other Annual Reports/Semi-Annual EPA Subpart GG Reports
<b>AQ-2</b>	Hourly ammonia slip emissions limit and calculations. Requirement to install an inlet NOx analyzer which shall be calibrated at least once every 12 months. Report ammonia slip quarterly.	Report ammonia slip quarterly	Air Quality\2018 Q4 Air Quality Reports\2018Q4 Daily Emissions Reports
		Inlet NOx analyzers are calibrated daily with outlet NOx analyzers.	
		Report exceedances	None
<b>AQ-3</b>	Install and maintain a flow meter to continuously record the ammonia injection rate measured at least once every 15 minutes and calibrated once every 13 months. Maintain flow rate between 0 and 225 lbs/hr.	Submit calibration records annually	Air Quality\Equipment Calibrations\Ammonia Flow Meter Certificate of Calibrations.
<b>AQ-4</b>	Install and maintain SCR temperature gauges and record at least once every hour. Gauge shall be calibrated once every 13 months and maintain between 225 and 1000 degrees F, not including startup or shutdown.	Submit calibration records annually	Air Quality\Equipment Calibrations\2018 Differential Pressure Cals and Thermocouple Certs
<b>AQ-4a</b>	Install and maintain SCR catalyst pressure gauges and record at least once every month. Gauge shall be calibrated once every 13 months and maintain differential pressure at no more than 6 inches water column.	Submit calibration records annually	Air Quality\Equipment Calibrations\2018 Differential Pressure Cals and Thermocouple Certs
<b>AQ-4b</b>	Install and maintain CO catalyst pressure gauges and record at least once every month. Gauge shall be calibrated once every 13 months and maintain differential pressure at no more than 6 inches water column.	Submit calibration records annually	Air Quality\Equipment Calibrations
<b>AQ-4c</b>	Install and maintain CO catalyst temperature gauges and record at least once every hour. Gauge shall be calibrated once every 13 months and maintain between 225 and 1250 degrees F.	Submit calibration records annually	Air Quality\Equipment Calibrations
<b>AQ-5</b>	Requires installation and maintenance of a Continuous Emissions Monitoring System (CEMS) for each turbine to measure CO concentration. Requires annual RATA testing.	Submit test reports annually.	Air Quality\Annual RATA and Testing
<b>AQ-6</b>	Requires installation and maintenance of a Continuous Emissions Monitoring System (CEMS) for each turbine to measure NOx concentration, O2, fuel flow rate, operational status codes (as defined in District Rule 2013). Requires annual RATA testing.	Submit RATA test reports annually.	Air Quality\Annual RATA and Testing
<b>AQ-7</b>	Electronically report daily mass emissions of NOx and daily operational status codes to the District in compliance with District Rule 2012.c.3.A.	Submit Monthly Emissions Reports the District as part of the CEC Quarterly Operational Report.	Air Quality\2018Q4 Air Quality Reports\2018 Q4 RTU files
<b>AQ-8</b>	Requires a Quarterly Operational Report to be submitted including fuel use for each gas turbine and duct burner, CO and NOx CEMS for each exhaust stack on hourly basis.	Quarterly Operational Report	Air Quality\2018 Q4 Air Quality Reports\2018Q4 Daily Emissions Reports
<b>AQ-10</b>	Defines tuning, startup and shutdown and limits duration for each type.	Submit startup, shutdown, and tuning fuel use, NOx emissions, and operational status in the Quarterly Operational Report.	Air Quality\2018 Q4 Air Quality Reports\2018Q4 Startup-Shutdown Reports
<b>AQ-11</b>	Establishes hourly limits for all parameters. Identifies allowable exceptions.	Demonstrate compliance in quarterly reports. Report exceptions to CEC.	Air Quality\2018 Q4 Air Quality Reports\2018Q4 Daily Emissions Reports
<b>AQ-12</b>	Establishes daily and monthly limits and emission factors for all parameters.	Submit monthly fuel use data and emission calculations in the Quarterly Operation Report.	Air Quality\2018 Q4 Air Quality Submittals\2018Q4 Monthly Limits Reports
<b>AQ-12a</b>	Establishes daily NOx lbs limit based on the emission of all four turbines combined.	Submit monthly fuel use data and emission calculations in the Quarterly Operation Report.	Air Quality\2018 Q4 Air Quality Submittals\2018Q4 Monthly Limits Reports
<b>AQ-14</b>	Establishes PM10 mass emission limits.	Submit PM10 source tests reports every three years.	N/A for 2018
<b>AQ-15</b>	Requires triennial source test for SOx, VOC, PM10. Establishes protocol and test requirements.	Submit source test reports every three years.	N/A for 2018
<b>AQ-16</b>	Requires annual NH3 source test. Establishes protocol and testing requirements.	Submit source test reports annually.	Air Quality\Annual RATA and Testing
<b>AQ-17</b>	Requires and details source testing for PM10 emission limit in AQ-14.	Submit source test reports every three years.	N/A for 2018



**Mountainview Generating Station (00-AFC-02C)  
CEC Conditions Compliance List**

<b>CEC Condition Number</b>	<b>Description of Condition Requiring Data Submission (refer to Final Decision for complete language)</b>	<b>Verification</b>	<b>Attachments</b>
<b>AQ-17a</b>	Requires and details annual source testing for NOx.	Submit source test reports annually.	Air Quality\Annual RATA and Testing
<b>AQ-17b</b>	Requires and details initial source testing for CO no later than 180 days from the date the permit for the new CO catalyst is issued.	Submit source test reports no later than 60 days following the source test date.	Air Quality\Annual RATA and Testing
<b>AQ-17c</b>	Establishes testing and reporting requirements for source tests.	Submit source test reports.	Air Quality\Annual RATA and Testing
<b>AQ-18</b>	Diesel fuel used for the emergency generator shall contain sulfur compounds less than or equal to 15ppm by weight.	Records maintained on site for a minimum of five years.	N/A
<b>AQ-19a</b>	Establishes operational and regeneration requirements for the Cleanair Systems "Permit" soot filter on the diesel emergency generator.	Records maintained on site for a minimum of five years.	N/A
<b>AQ-20</b>	Install and maintain a non-resettable time meter on the emergency diesel generator IC engine.	Site will be available for inspection by regulatory representatives.	N/A
<b>AQ-21</b>	Data logger and operation log requirements for the emergency diesel generator IC engine.	Records maintained on site for a minimum of five years.	N/A
<b>AQ-22</b>	Emergency diesel generator shall only be used during utility failure, except for maintenance purposes or as described in AQ-23.	Records maintained on site for a minimum of five years.	N/A
<b>AQ-23</b>	Emergency diesel generator operation is limited to 199 hours/year. No more than 50 hrs/yr for maintenance and testing, unless loss of grid power (emergency operation).	Submit generator operation log in AQ-21 annually as part of the fourth Quarter Operational Report.	Air Quality\2018 Q4 Air Quality Reports\MVBOP_2018
<b>AQ-24</b>	Diesel fuel used for the diesel emergency fire pump shall contain sulfur compounds less than or equal to 15ppm by weight.	Records maintained on site for a minimum of five years.	N/A
<b>AQ-25</b>	Maintain fuel injection timing of the fire pump IC engine at 9.7 degrees retarded relative to standard timing.	Records maintained on site for a minimum of five years.	N/A
<b>AQ-26</b>	Install and maintain a non-resettable time meter on the diesel emergency fire pump IC engine.	Site will be available for inspection by regulatory representatives.	N/A
<b>AQ-27</b>	Operation log requirements for the diesel emergency fire pump IC engine.	Records maintained on site for a minimum of five years.	N/A
<b>AQ-28</b>	Diesel fire pump operation is limited to 199 hours/year. No more than 34 hrs/yr for maintenance and testing.	Submit fire pump operation log in AQ-27 annually as part of the fourth Quarter Operational Report.	Air Quality\2018 Q4 Air Quality Reports\MVBOP_2018
<b>AQ-33</b>	PM10 limit on each cooling tower of 70.1 pounds per day based on equation in AQ-34.	Submit data and calculations annually.	Water Quality/ Cooling Tower PM10 Files
<b>AQ-34</b>	PM10 equation for cooling tower drift.	Submit daily data and calculations annually in the fourth Quarter Operational Report.	Water Quality/ Cooling Tower PM10 Files
<b>AQ-35</b>	Continuously measure cooling tower basin water conductivity for use in the AQ-34 equation.	Maintain data onsite for a minimum of two years.	N/A
<b>AQ-36</b>	Annual NOx RTC maintenance requirement.	Submit RECLAIM reports filed with the District quarterly in each Quarterly Operational Report.	Air Quality\Other Annual Reports\SCAQMD APEP Report
<b>AQ-40</b>	Requirements for annual and complaint inspections for visible emissions from all stacks and the abrasive blast cabinet.	Records will be available for inspection by regulatory representatives.	Air Quality\Annual RATA and Testing
<b>AQ-41</b>	Annual inspection of abrasive blast cabinet and media filter.	Records will be available for inspection by regulatory representatives.	N/A
<b>AQ-42</b>	Record requirements for abrasive blast cabinet inspections.	Records will be available for inspection by regulatory representatives.	N/A
<b>AQ-45</b>	Coatings record keeping requirements.	Records will be available for inspection by regulatory representatives.	N/A
<b>BIO-2</b>	Requires a Designated Biologist to be assigned and approved by CEC.	Update info as needed	N/A
<b>BIO-3</b>	Designated Biologist shall submit record summaries in the Annual Compliance Report.	Submit report annually.	Biology\SCE Mountainview BIO2 Report_2018
<b>BIO-4</b>	Requirements for how to proceed in case of potential non-compliant conditions.	Report BIO conditions non-compliance.	N/A in 2018
<b>BIO-5</b>	Active project personnel training for worker environmental awareness.	Maintain signed training statements on site for the duration of personnel employment and six months after termination.	Biology\2018 BIO Training
<b>HAZ-1</b>	Hazardous materials in reportable quantities only by prior approval by CEC.	Submit data annually.	Hazmat and Hazwaste\2018 Haz Materials Business Plan
<b>NOISE-2</b>	Requirement for handling noise complaints	Resolve and report noise complaints as needed	N/A, no complaints in 2018
<b>TLSN-2</b>	Requirement for handling radio or television signal interference complaints from the operation of the transmission line.	Resolve and report signal interference complaints as needed	N/A, no complaints in 2018
<b>VIS-1</b>	Requirements for coating of structures, building and tanks	Report coating maintenance annually	Site Pictures Folder (N/A for 2018)

**Mountainview Generating Station (00-AFC-02C)  
CEC Conditions Compliance List**

<b>CEC Condition Number</b>	<b>Description of Condition Requiring Data Submission (refer to Final Decision for complete language)</b>	<b>Verification</b>	<b>Attachments</b>
<b>WASTE-3</b>	Notify CEC of impending waste-management related enforcement action	Notify as needed	N/A for 2018
<b>WASTE-4</b>	Waste management plan required for construction and operation. Annual reporting of waste management methods used during year.	Submit data annually	Hazmat and Hazwaste/ 2018 HazWaste Manifests
<b>GENERAL CONDITIONS- Annual Report #10</b>	Listing of complaints, NOVs, official warnings, and citations during the year	Submit data annually	Violations