

**DOCKETED**

<b>Docket Number:</b>	81-AFC-01C
<b>Project Title:</b>	Compliance - Application for Certification of the Occidental Plant # 1
<b>TN #:</b>	231320
<b>Document Title:</b>	2018 Annual Compliance Report for the Calistoga Power Plant (Unit 19, Occidental Plant 1)
<b>Description:</b>	2018 Annual Compliance Report for the Calistoga Power Plant (Unit 19, Occidental Plant #1) at the Geysers
<b>Filer:</b>	William King
<b>Organization:</b>	Geysers Power Company, LLC
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	12/26/2019 12:39:46 PM
<b>Docketed Date:</b>	12/26/2019



**GEYSERS POWER COMPANY, LLC**

10350 Socrates Mine Road  
Middletown, CA 95461

GWQ-19-062

December 23, 2019

Eric Veerkamp, Compliance Project Manager  
Energy Facilities Siting and Environmental Protection Division  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, California 95814-5512

Subject: **81-AFC-01C** 2018 Annual Compliance Report - U19 (Calistoga) Power Plant

Mr. Veerkamp:

In fulfillment of the Compliance Plan's annual reporting requirement, Geysers Power Company, LLC hereby submits the following report for Unit 19 (Calistoga).

The California Energy Commission established a monitoring program with all compliance verifications maintained by the United States Geological Survey (USGS). A letter of understanding between CEC and USGS with respect to post-licensing project compliance management duties was established in 1982. On August 25, 2010, an amendment petition was approved by the Energy Commission, which released the USGS from the compliance project manager role and placed the project compliance manager responsibilities with the Energy Commission.

If you have any comments or questions, please contact me at (707) 431-6097.

Sincerely,

Bill King  
Project Manager, EHS  
Calpine Corporation

cc:

Ms. Amanda James  
Bureau of Land Management  
2550 N. State Street  
Ukiah, California 95482

**81-AFC-01C**

**CALIFORNIA ENERGY COMMISSION**

**FINAL DECISION**

**CONDITIONS FOR CERTIFICATION**

**CALISTOGA POWER PLANT**

**(Licensed as OXY 1, aka Santa Fe Geothermal Plant No 1)**

**2018 ANNUAL COMPLIANCE REPORT**

2018 Annual Report to the California Energy Commission  
81-AFC-01C Geysers Calistoga Power Plant

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## **EXECUTIVE SUMMARY**

Section 25532 of the Public Resources Code provides that the California Energy Commission (CEC) shall establish a monitoring system to assure that any facility certified by the CEC is constructed and operated in compliance with air, water quality, public health, safety, and other applicable regulations, guidelines, and conditions adopted or established by the CEC.

On January 29, 1981, Occidental Geothermal, Inc. filed an Application for Certification (AFC) for Oxy No.1 Geothermal Power Plant. In order for the AFC to be granted the CEC issued the "Commission Decision Document for Oxy No.1 Geothermal Power Plant". Florida Power and Light Energy (FPL) subsequently purchased and renamed OXY No 1 to the "Santa Fe Geothermal Power Plant." Since October 19, 1999, when FPL sold the "Santa Fe Geothermal Power Plant" (Now Calistoga Power Plant), transfer of ownership requires Geysers Power Company, LLC (GPC) to be responsible for administering and monitoring various Conditions for Certification as contained in the Commission Decision. As directed by CEC letter, dated August 8, 1997 GPC is submitting information required on an annual rather than a quarterly basis.

According to the guidance provided by CEC staff on July 12, 1995, only the on-going compliance tasks will be addressed in this, and future Annual Reports. The status of the compliance tasks in each of the following areas are summarized below:

**Air Quality:** Two on-going compliance tasks

**Public Health:** Three on-going compliance tasks

**Biological Resources:** One on-going compliance task

**Water Quality, Hydrology and Water Resources:** Nine on-going compliance tasks.

**Solid Waste Management:** Four on-going compliance tasks.

**Safety:** One on-going compliance task

**Transmission Line Safety and Nuisance:** Three on-going compliance tasks. GPC does not own the transmission facilities so cannot comply with these tasks.

**Noise:** One on-going compliance task.

This Annual Report meets the aforementioned requirements found in the Compliance Monitoring Plan of the CEC's Final Decision for the Calistoga Power Plant.

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**SECTION 1: AIR QUALITY**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Verification Task</b>	<b>Status</b>	<b>Task implementation</b>												
<b>Condition: 1-1</b>	LCAQMD CEC CARB	GPC shall summarize in a periodic compliance report any interactions with the LCAPCD. GPC shall immediately inform the CEC and CARB in writing of any formal appeals filed with the LCAPCD.	On-going	The Annual Compliance Report is provided below.												
<p><b>Annual Compliance Report:</b> Geysers Power Company LLC (GPC) interactions with the LCAQMD occur during the course of the year as routine reports and non-routine submittals. No significant interactions occurred during this calendar year.</p> <p><b>Quarterly Operating Reports:</b> The following Quarterly reports were submitted to LCAQMD the required elements: are addressed in the report sections entitled: Operating Hours, Chemical Usage, and Source Test Results; Listing of Plant Outages; Incidents Requiring Corrective Action and Monitor Irregularities; and Treated gas monitor Calibration and Maintenance Activities.:</p> <table border="0" data-bbox="205 695 1982 868"> <tr> <td><input checked="" type="checkbox"/> Fourth Quarter 2017 Compliance Monitoring Report (Oct – Dec)</td> <td>Submittal to LCAQMD,</td> <td>dated 2/1/2018, ref, GPC18-001</td> </tr> <tr> <td><input checked="" type="checkbox"/> First Quarter 2018 Compliance Monitoring Report (Jan – Mar)</td> <td>Submittal to LCAQMD,</td> <td>dated 4/27/2018, ref. GPC18-036,</td> </tr> <tr> <td><input checked="" type="checkbox"/> Second Quarter 2018 Compliance Monitoring Report (Apr – June)</td> <td>Submittal to LCAQMD,</td> <td>dated 7/24/2018, ref. GPC18-074</td> </tr> <tr> <td><input checked="" type="checkbox"/> Third Quarter 2018 Compliance Monitoring Report (July – Sep)</td> <td>Submittal to LCAQMD,</td> <td>dated 10/22/2018, ref GPC18-085</td> </tr> </table> <p><b>Other Routine Reports:</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Annual Production 2018 Throughput Report to LCAQMD, 10/19/2018, ref. GPC18-040</li> </ul> <p><b>Nonroutine Submittals</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> NESHAP Notifications – <b>None</b></li> <li><input checked="" type="checkbox"/> Breakdown reports – <b>None</b></li> <li><input checked="" type="checkbox"/> Applications for Authority to Construct equipment modifications or replacement: <b>None</b></li> <li><input checked="" type="checkbox"/> 2018 annual request for a statement of compliance verification, 7/1/2019, ref. GPC19-057.</li> </ul> <p><b>Significant Interactions with the LCAQMD:</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> LCAQMD issued a statement of compliance verification for 2017 on 2/13/2019.</li> <li><input checked="" type="checkbox"/> No Appeals filed;</li> <li><input checked="" type="checkbox"/> No Variances filed;</li> <li><input checked="" type="checkbox"/> No Notices of Violations were issued</li> </ul>					<input checked="" type="checkbox"/> Fourth Quarter 2017 Compliance Monitoring Report (Oct – Dec)	Submittal to LCAQMD,	dated 2/1/2018, ref, GPC18-001	<input checked="" type="checkbox"/> First Quarter 2018 Compliance Monitoring Report (Jan – Mar)	Submittal to LCAQMD,	dated 4/27/2018, ref. GPC18-036,	<input checked="" type="checkbox"/> Second Quarter 2018 Compliance Monitoring Report (Apr – June)	Submittal to LCAQMD,	dated 7/24/2018, ref. GPC18-074	<input checked="" type="checkbox"/> Third Quarter 2018 Compliance Monitoring Report (July – Sep)	Submittal to LCAQMD,	dated 10/22/2018, ref GPC18-085
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**SECTION 1: AIR QUALITY (Continued)**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 1-2</b>	CEC LCAPCD	GPC shall summarize in an annual compliance report to the Compliance Project Manager (CPM) any significant interactions related to Calistoga Power Plant with the LCAPCD. GPC shall immediately inform the CPM and CARB in writing of any formal appeals filed with the LCAPCD.	On-going	The Annual Compliance Report provides references to reports submitted to LCAQMD in 2018. The required elements pertaining to this CEC licensed Power Plant were submitted to the CEC Compliance Manager. No Notices were received from the LCAQMD other than the annual invoice for permit renewal.
<b>Condition: 1-3</b>	CEC LCAPCD	GPC shall file a copy of the written approval from the LCAPCD with the CEC prior to beginning construction of any alternative H2S emissions abatement system	As Needed	GPC operators use only the equipment specified in the AFC for the Stretford abatement system and secondary chemical feed system.
<b>Condition: 1-6</b>	CEC LCAPCD	GPC shall, at the request of the LCAQMD, operate and maintain an on-site meteorological station. GPC shall submit data of wind direction, wind speed and temperature in periodic compliance reports filed with the CEC.	As Needed	LCAQMD, made no request for an on-site meteorological station. GPC continues to fully participate in the Geyser Air Monitoring Program (GAMP.)

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**SECTION 2: PUBLIC HEALTH**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 2-1</b>	CDHS/RHB	During first year of operations, provide CDHS/RHB with quarterly sampling results of Radon-222 concentrations entering the plant. After first year, annual reports will be submitted	On-going	First, second, and fourth quarter samples of main steam supply Radon 222 concentrations were collected in 2018. Calculated resulting concentrations of radon exiting the cooling tower stacks are below 0.50 pCi/l. Annual reports to CDHS-RHB are submitted upon request
<b>Condition: 2-2</b>	CDHS/RHB	If Radon-222 concentration exceeds 3.0 pCi/l in the cooling tower exhaust, CDHS/RHB must be notified by written report with 30 days of detection.	On-going	Measurements of main steam Radon 222 used to calculate radon concentrations in the cooling tower exhaust are consistently below California's standard (3.0 pCi/l for indoor radon exposure).
<b>Condition: 2-3</b>	CDHS/RHB	GPC will notify CDHS/RHB and the CEC within 24 hours if levels of Radon-222 exceed 6.0 pCi/l in the cooling tower exhaust. A special report will follow outlining corrective actions taken.	On-going	Measurements of main steam Radon 222 used to calculate radon concentrations in the cooling tower exhaust are consistently below California's standard of 3.0 pCi/l for indoor radon exposure. Confirmation sampling and written special reports to CDHS/RHB have never been necessary.



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**SECTION 5: BIOLOGICAL RESOURCES**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 5-4</b>	BLM	GPC shall monitor drift effects on the vegetation surrounding the power plant. GPC shall submit annual reports to the CEC in those years in which the monitoring takes place. The reports shall include copies of laboratory analysis, field survey work and full color copy of aerial photographs of the leasehold.	On-going	A Petition for Amendment to suspend the monitoring requirement was submitted March 13th 2008 to Donna Stone, CPM. The Petition was granted by the Commission on 7/16/08; and allowed Geysers Power Company to suspend boron drift monitoring with CPM approval. CPM approval to suspend monitoring was given 7/16/08.

**SECTION 6: WATER QUALITY, HYDROLOGY AND WATER RESOURCES**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 6-2</b>	NCRWQCB	GPC shall comply with the Central Valley Region California Regional Water Quality Control Board CVRWQCB Order 99-029.	On-going	GPC complies with CVRWQCB Order No. 99-029.
<b>Condition: 6-5</b>	LCBO	To prevent spills of Stretford process material from leaving the immediate vicinity, GPC shall surround the H <sub>2</sub> S abatement process area with an impermeable concrete barrier. Spilled Stretford process material will drain to a sump where it will be pumped to a chemical storage tank for reuse in the Stretford process or for disposal off site at an approved Class 1 solid waste disposal site	On-going	The Stretford system area is surrounded by an impermeable concrete barrier. A drain system routes spilled Stretford material to a designated sump. It is then pumped back into the Stretford process.
<b>Condition: 6-6</b>	CEC LCBO CVRWQCB	The catch basin shall be equipped with a 100 gallon per minute pump to return spilled material to the cooling tower basin for reinjection. Should a spill occur which exceeds the capacity of the pumps; GPC plant personnel shall use a portable pump to remove excess material.	On-going	GPC complies with the Compliance Task. Two yard area containment pumps are designed to meet the required criteria to prevent spills. Calistoga had no storm water releases in 2018.

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**SECTION 6: WATER QUALITY, HYDROLOGY AND WATER RESOURCES (continued)**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 6-6 (continued)</b>	CEC LCBO CVRWQCB	Alarm systems will notify plant operators when a spill has occurred and when the catch basin pump has started. GPC plant personnel shall respond to the alarms within 30 minutes and take measures necessary to correct the problem.	On-going	GPC complies with the Compliance Task. In addition, operators inspect main control board alarms each shift.
<b>Condition: 6-7</b>	CEC LCBO	GPC shall ensure that rainwater entering the Stretford process area will not enter surface water or groundwater. The rainwater shall be used in the Stretford process or pumped to the cooling tower overflow structure	On-going	The Stretford system area is surrounded by an impermeable concrete barrier. A drain system routes rainwater to a designated sump, which is then pumped to reinjection during rains.
<b>Condition: 6-7 (continued)</b>	CEC LCBO	The steam condensate from the plant shall be used for cooling water, with any excess reinjected into the geothermal reservoir.	On-going	The power plant is designed so that excess steam condensate is reinjected into the geothermal reservoir.
<b>Condition: 6-8</b>	CEC LCBO CVRWQCB	To minimize the potential adverse impacts of storm runoff on the quality of Anderson Creek, GPC shall return plant site runoff to the cooling tower basin for subsequent injection into the geothermal reservoir. When the capacity of the return system is exceeded and a spill has not occurred, the runoff will be released from the site into Anderson Creek. If storm runoff is released from the power plant site, GPC shall satisfy the Basin (5A) Plan intent and any applicable requirements of the CVRWQCB.	On-going	GPC adheres to Waste Discharge Requirements Order No. 99-029 adopted on April 30, 1999 and maintains the plant spill containment system. GPC does not release runoff into Anderson Creek. Calistoga had no storm water releases in 2018.

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**SECTION 6: WATER QUALITY, HYDROLOGY AND WATER RESOURCES** (continued)

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 6-10</b>	CEC NCRWQCB	The CEC added new revision to Condition 6-10 on March 12, 2004 which provides the following: The project owner shall provide the Compliance Project Manager with copies of all local and state water quality permits related to the use and disposal of reclaimed municipal wastewater within thirty (30) days of receipt. In the annual compliance reports, the project owner shall provide the CPM with data on the annual quantity of water reinjected at the facility, and a copy of the report submitted to the California Department of Health Services on the additional uses of recycled water per Provision #2 of the December 5, 2003 California Department of Health Services approval letter.	On-going	No recycled Santa Rosa Wastewater was sent to the cooling tower at the Calistoga Power Plant during 2018. A copy of GPC's letter GWQ-19-020 dated July 23, 2019 is provided for CPM review (Attachment 1).  Total water injected within the Calistoga Plant area in 2018: 434,251,104 gallons. In addition to recycled Santa Rosa Wastewater, this value includes condensate reinjection.

**SECTION 11: SOLID WASTE MANAGEMENT**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 11-1</b>	CEC	Keep a letter on file verifying that hazardous waste haulers have DTSC certificates of registration.	On-going	GPC only uses DTSC registered waste haulers which is a contract requirement. GPC has certificates of registration on file for 2018. The certificates of registration expire at different times during the year. GPC requests updated copies as required
<b>Condition: 11-2</b>	LCBO	Any sludge, which accumulates in the cooling tower, will be vacuumed off and hauled by a registered hazardous waste hauler to an approved disposal site. GPC shall each month submit completed hazardous waste manifests to DTSC each month.	On-going	Any sludge removed from the cooling tower is disposed of according to the applicable state and federal laws and regulations. GPC submits completed hazardous waste manifests to DTSC each month.

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**SECTION 11: SOLID WASTE MANAGEMENT** (continued)

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 11-3</b>	DTSC CEC	Notify the CEC, DTSC, and Integrated Waste Management Board of the selected disposal site. Any notice of change in disposal sites will be submitted as changes occur	On-going	GPC only uses licensed and permitted disposal facilities. The CEC has acknowledged that the information can be obtained, upon request, from the Biennial Hazardous Waste Report to the Department of Toxic Substances Control (DTSC) or US EPA. Since CEC certification, the Hazardous Waste Report being submitted to the DTSC has become required by law. Reporting to the CEC regarding selection of waste disposal sites is no longer necessary. Copies of both hazardous waste shipping manifests and reports are maintained at The Geysers, and are available for inspection.
<b>Condition: 11-5</b>	DTSC CEC	Notify the CEC if GPC files an in-lieu application with DTSC for the operation of a Hazardous Waste Facility.	On-going	GPC operates under the State and Federal Regulations as a hazardous waste generator only. GPC does not intend to operate hazardous waste facilities that require a permit.

**SECTION 12: SAFETY**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 12-13</b>	CAL/OSHA	GPC shall note any CAL/OSHA inspections in its periodic compliance reports.	On-going	CAL/OSHA conducted no inspections at Calistoga Power Plant in 2018.

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**SECTION 13: TRANSMISSION LINE --SAFETY AND NUISANCE**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 13-4</b>	CEC	GPC shall maintain a record of complaints regarding induced currents from vehicles, portable objects, large metallic roofs, fences, gutters, or other objects.	On-going	GPC does not own the transmission facilities so cannot comply with this task.
<b>Condition: 13-6</b>	CEC	GPC shall maintain records of CAL/OSHA inspections and shall make them available to CEC staff upon request.	On-going	GPC does not own the transmission facilities so cannot comply with this task.
<b>Condition: 13-8</b>	CEC	GPC shall report within 30 days of an employee injury or fatality to the CEC		GPC does not own the transmission facilities so cannot comply with this task.

**SECTION 16: NOISE**

<b>Compliance Plan Condition</b>	<b>Agency</b>	<b>Compliance Task</b>	<b>Status</b>	<b>Task implementation</b>
<b>Condition: 16-3</b>	LCAPCD	GPC shall comply with the Lake County Noise Ordinance Standards, which are 55 dBA for daytime hours (7 a.m. to 10 p.m.) and 45 dBA for nighttime hours (10 p.m. to 7 a.m.) GPC must take measures to resolve noise complaints.	On-going	GPC complies with applicable Noise Ordinances. There were no noise complaints in 2018.

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**LIST OF ACRONYMS**

AFC	Application for Certification
ARB	Air Resources Board
BLM	Bureau of Land Management
CAL/OSHA	California Occupational Safety and Health Administration
CEC	California Energy Commission
CDF&G	California Department of Fish and Game
CDF	California Department of Forestry
CDHS/RHB	California Department of Health Services Radiological Health Branch
CPM	Compliance Program Manager
CVRWQCB	Central Valley Regional Water Quality Control Board
DTSC	California Department of Toxic Substances Control
FPL	Florida Power and Light Energy
GAMP	Geysers Air Monitoring Program
GPC	Geysers Power Company LLC
LCAQMD	Lake County Air Quality Management District
LCBO	Lake County Building Official
NCRWQCB	North Coast Regional Water Quality Control Board
NSCAPCD	Northern Sonoma County Air Pollution Control District
SCBO	Sonoma County Building Official
SMUD	Sacramento Municipal Utility District
PG&E	Pacific Gas and Electric Company
UBC	Uniform Building Code
USGS	United States Geological Survey

# ATTACHMENT 1



**GEYSERS POWER COMPANY, LLC**

10350 Socrates Mine Road  
Middleton, CA 95461  
707.431.6000

GWQ-19-020

July 23, 2019

Janice M. Thomas, P.E.  
Drinking Water Field Operations Branch  
California Department of Health Services  
50 D Street, Suite 200  
Santa Rosa, CA 95404

**Subject: 2018 Geysers Power Plant Units Recycled Water Use Report**

Dear Ms. Thomas:

Use of Santa Rosa Waste Water (SRWW) first began at Unit 17 on July 22, 2004 where it supports cooling tower basin levels by replacing blowdown water at a rate of 400-500 gpm. When tower basin water levels are sufficiently high, SRWW bypasses the tower and enters the onsite sediment pond, where it mixes with condensate then gravity fed to the Unit 11 sediment pond prior to reinjection at the OS-16 well. Tabulated below are various uses of SRWW during 2018.

2018 Total	U17 Tower	U20 Tower	Unit 7/8 Sediment Pond	Aidlin Injection and/or Burner
Million Gallons	83,550,307	122,389,385	377,179,975	112,539,666

Minor amounts of SRWW were used for incidental purposes as identified in Section 3.2 of the Engineering Report. These uses may consist of dust control, construction, fire-fighting and industrial process water. Additionally, SRWW was used for various drilling activities in Sonoma County during 2018. Appropriate signage and labeling was directed by the User Supervisor (Jaime Griep) for these activities.

If you have any questions, please contact me at (707) 431-6097.

Sincerely,

  
Bill King  
Calpine-Geysers EHS