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MALBURG GENERATING STATION
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28 January 2021

Mr. Anwar Ali
Compliance Project Manager
California Energy Commission
Energy Facilities Siting Division
1516 9th Street, MS 2000
Sacramento, CA 95814-5512

Subject: Malburg Generating Station
2020 Annual Compliance Report

Dear Mr. Ali:

On behalf of the owner of the Malburg Generating Station, Bicent (California) Malburg LLC, Colorado Energy has compiled the attached Annual Compliance Report per the California Energy Commission Decision 01-AFC-25. A copy of the 2020 Hazardous Material Business Plan from CERS is also attached.

Please contact me at (303) 607-5590 or kmccormack@heorotpower.com if you have any questions or need additional information.

Sincerely,

Kyle McCormack
Sr. Manager of Environmental

Attachments: 2020 MGS Annual Compliance Report
2020 Hazardous Materials Business Plan from CERS

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2020 ANNUAL COMPLIANCE REPORT

MALBURG GENERATING STATION
4963 SOTO STREET, VERNON, CA 90058

SUBMITTED TO:

CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, SACRAMENTO, CA 95814

January 2021

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INTRODUCTION

This Annual Compliance Report has been prepared to meet the California Energy Commission (CEC) requirements for the Malburg Generating Station (MGS). This report fulfills various Conditions of Certifications as described in the California Energy Commission's Decision #01-AFC-25, May 2003 and amended in June 2019.

1.1 PROJECT LOCATION AND DESCRIPTION

The Malburg Generating Station is located at 4963 Soto Street on approximately 3.4 acres, in an industrial land use area. MGS is located near the geographic center of metropolitan Los Angeles County. MGS consists of two Siemens SGT-800 frame type natural gas combustion turbine generators (CTGs); two heat recovery steam generators (HRSG); a steam turbine-generator (STG); a cooling tower, a diesel fuel fired emergency firewater pump and support equipment.

The commissioning of MGS was completed in October 2005 and the power plant began Commercial Operation on October 17, 2005.

1.2 ORGANIZATION OF THE QUARTERLY COMPLIANCE REPORT

A summary of each annual condition of certification and required means of verification which has not been completely satisfied is provided in Section 2. Each sub-section also contains a description of the method used by MGS to demonstrate compliance with the verification requirements and references to Appendices, Figures and Tables as appropriate.

1.3 SATISFIED CONDITIONS OF CERTIFICATION

Several Conditions of Certification have been completely satisfied during the construction and startup phases of the project. These conditions were the subject of a communication between MGS and CEC on 30 March 2011 and also a subsequent meeting on 15 April 2011. At this meeting, MGS and CEC staff reached agreement that the following Conditions of Certification have been completely satisfied and, therefore, are not addressed in any report to the CPM:

COM-1, COM-5, COM-7, COM-9, COM-10, COM-11, GEN-1, GEN-2, GEN-3, GEN-4, GEN-5, GEN-6, GEN-7, GEN-8, CIVIL-1, CIVIL-2, CIVIL-3, CIVIL-4, STRUC-1, STRUC-2, STRUC-3, STRUC-4, MECH-1, MECH-2, MECH-3, ELEC-1, TSE-1, TSE-2, TSE-3, TSE-4, TSE-5, TSE-6, TSE-7, TSE-8, TLSN-1, AQ-C1, AQ-C2, AQ-C3, AQ-C4, AQC12, AQ-C14, AQ-36, PUBLIC HEALTH-1, WORKER SAFETY-1, WORKER SAFETY-2, HAZ-2, HAZ-3, HAZ-4, HAZ-5, HAZ-8, WASTE-1, WASTE-2, SOILS & WATER-1, SOILS & WATER-2, SOILS & WATER-3, SOILS & WATER-6, SOILS & WATER-7, CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6, CUL-7, PAL-1, PAL-2, PAL-3, PAL-4, PAL-5, PAL-6, PAL-7, LAND-1, LAND-2, TRANS-1, TRANS-2, TRANS-3, TRANS-4, TRANS-5, TRANS-6, TRANS-7, TRANS-9, VIS-4, NOISE-1, NOISE-3, NOISE-4, NOISE-5, NOISE-6, NOISE-7, and NOISE-8.

SECTION 2

ANNUAL COMPLIANCE DETAILS

The compliance details for various conditions of certification are provided below.

2.1 CONDITION OF CERTIFICATION COM-2

As per the Condition of Certification Number COM-2, the project owner shall grant Energy Commission staff and delegate agencies or consultants unrestricted access to the power plant site.

No specific means of verification of the above condition of certification are listed in the Decision.

As demonstration of compliance, the Malburg Generating Station site remains accessible for Energy Commission staff and delegate agencies or consultants.

2.2 CONDITION OF CERTIFICATION COM-3

As per the Condition of Certification Number COM-3, the project owner shall maintain project files onsite. Energy Commission staff and delegate agencies shall be given unrestricted access to the files.

No specific means of verification of the above condition of certification are listed in the Decision.

As demonstration of compliance, the Malburg Generating Station files remain accessible for Energy Commission staff and delegate agencies or consultants.

2.3 CONDITION OF CERTIFICATION COM-4

As per the Condition of Certification Number COM-4, the project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such condition was satisfied by work performed or the project owner or his agent.

No specific means of verification of the above condition of certification are listed in the Decision.

As demonstration of compliance, MGS acknowledges that it is responsible for the delivery and content of verification submittals to the CPM.

2.4 CONDITION OF CERTIFICATION COM-6

As per the Condition of Certification Number COM-6, the project owner shall submit a compliance matrix (in a spreadsheet format) with each monthly and annual compliance report which includes the status of all compliance conditions of certification.

No specific means of verification of the above condition of certification are listed in the Decision.

As demonstration of compliance, the MGS – CEC Commission Decision Compliance Matrix is provided in Appendix A.

2.5 CONDITION OF CERTIFICATION COM-8

As per the Condition of Certification Number COM-8, after construction ends and throughout the life of the project, the project owner shall submit Annual Compliance Reports (ACRs) which include specific information.

No specific means of verification of the above condition of certification are listed in the Decision.

As demonstration of compliance, MGS submits the following information to comply with the individual requirements:

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);*** An updated Compliance Matrix is provided in Appendix A.
2. ***A summary of the current project operating status and an explanation of any significant changes to facility operations during the year;*** The facility remains in operation and no significant changes have occurred during the year.
2. ***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;*** These documents are submitted as Appendices to the Report and are listed as such in the 'Attachments' section of this transmittal letter.
4. ***A cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM;*** No post-certification changes have been approved during the year.
5. ***An explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided;*** No submittal deadlines were missed.
6. ***A listing of filings made to, or permits issued by, other governmental agencies during the year;*** Filings to governmental agencies were submitted as required during the year, including Annual Compliance Certification to SCAQMD and EPA, Semi-Annual Monitoring Report to SCAQMD, daily, monthly and electronic NOx reports to AQMD, Quarterly Certification of Emission Reports (QCER) to AQMD, quarterly EDR's to EPA, Annual Emissions Inventory to SCAQMD, Annual Greenhouse Gas Report to CARB and EPA, source testing notification and test report to SCAQMD, Annual Permit Emissions Program (APEP) report to SCAQMD, Annual Storm Water Discharge Report to Los Angeles County Sanitation Districts, and Semi-Annual Industrial WW Monitoring Report to Los Angeles County Sanitation Districts.
The LACSD Industrial Wastewater Permit 20436 was renewed on November 16th 2020 and expires on November 15th, 2025.
7. ***A projection of project compliance activities scheduled during the next year;*** Aside from sampling, testing, monitoring and reporting according to various

permits and the CEC Decision, no additional project compliance activities are scheduled.

8. ***A listing of the year's additions to the on-site compliance file***; All test and monitoring results, reports, filings, and other evidence of compliance with various permits and the CEC Decision were added to the plant files. Please refer to Condition #6 for specific items.

9. ***An evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date;*** As there have been no changes to the configuration or operation of the plant during the year, no changes or suggestions resulted from an evaluation of this plan.

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;***

- A Notice to Comply #44172 was issued December 3, 2020.
- A Notice of Violation #P68325 was issued December 3, 2020.
- A Notice of Violation #P166127 was issued March 18, 2020.

11. ***A listing of all outages planned for the coming year and a listing of all outages that occurred during the previous year, including the anticipated duration and the reason for each outage occurrence.***

- May 2, 2020 to May 3, 2020, general spring outage.
- November 1, 2020 0000 thru November 6, 2020 2400; Fall Outage, general semi-annual maintenance, BOP specific scope of work to be determined.
- March 22, 2021 thru April 4, 2021, general semi-annual maintenance, BOP specific scope of work to be determined
- November 1, 2021 0000 to November 26, 2020 2400; Fall outage, SCR Catalyst replacement, BOP specific scope of work to be determined.

2.6 CONDITION OF CERTIFICATION COM-12

As per the Condition of Certification Number COM-12, within 10 days of receipt, the project owner shall report to the CPM, all notices, complaints, and citations.

No specific means of verification of the above condition of certification are listed in the Decision.

As demonstration of compliance, MGS shall report to the CPM all notices, complaints and citations.

A Notice to Comply #44172 was issued December 3, 2020. A Notice of Violation #P68325 was issued December 3, 2020. A Notice of Violation #P166127 was issued March 18, 2020.

2.7 CONDITION OF CERTIFICATION COM-13

As per the Condition of Certification Number COM-13, the project owner shall submit a closure plan to the CPM at least twelve months prior to commencement of a planned closure.

No specific means of verification of the above condition of certification are listed in the Decision.

As demonstration of compliance, MGS shall submit a closure plan to the CPM at least twelve months prior to commencement of a planned closure, but at this time MGS remains in operation.

2.8 CONDITION OF CERTIFICATION COM-14

As per the Condition of Certification Number COM-14, to ensure that public health and safety and the environment are protected in the event of an unplanned temporary closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation. The approved plan must be in place prior to commercial operation of the facility and shall be kept at the site at all times.

For verification of the above condition of certification, the project owner, in consultation with the CPM, will update the on-site contingency plan as necessary. The CPM may require revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Energy Commission, the project owner will review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM. In the event of an unplanned temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan.

As demonstration of compliance, MGS has submitted the on-site contingency plan as scheduled. MGS will review the on-site contingency plan as part of preparation for the annual compliance reports, and recommend changes to bring the plan up to date.

During this year, MGS recommends no changes to the plan. In the event of an unplanned temporary closure, MGS shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan.

2.9 CONDITION OF CERTIFICATION COM-15

As per the Condition of Certification Number COM-15, to ensure that public health and safety and the environment are protected in the event of an unplanned permanent closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation.

For verification of the above condition of certification, all of the requirements specified for unplanned temporary closure shall also apply to unplanned permanent closure.

As demonstration of compliance, MGS remains in operation. In the event of an unplanned permanent closure, MGS shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan.

2.10 CONDITION OF CERTIFICATION COM-16

As per the Condition of Certification Number COM-16, the project owner must petition the Energy Commission to delete or change a condition of certification, modify the project design or operational requirements and/or transfer ownership of operational control of the facility.

No specific means of verification of the above condition of certification are listed in the Decision.

A Petition to Amend the Final Decision for the Malburg Generating Station (01-AFC-25C) was submitted on November 17, 2017 and was approved in June 2019.

2.11 CONDITION OF CERTIFICATION AQ-C5

As per the Condition of Certification Number AQ-C5, no chromium containing compounds shall be added to cooling tower circulating water.

For verification of the above condition of certification, MGS shall make the site available for inspection by representatives of the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains accessible for inspection by representatives of the District, ARB, U.S. EPA and Energy Commission.

2.12 CONDITION OF CERTIFICATION AQ-C13

As per the Condition of Certification Number AQ-C13, MGS shall submit to the CPM for review and approval any modification proposed by either MGS or issuing agency to any project air permit.

For verification of the above condition of certification, MGS shall submit any proposed air permit modification to the CPM within five working days of its submittal either by MGS to an agency or receipt of proposed modifications from an agency. MGS shall submit all modified air permits to the CPM within 15 days of receipt.

A facility permit to operate was issued to MGS by the SCAQMD dated July 3, 2020.

2.13 CONDITION OF CERTIFICATION AQ-1

As per the Condition of Certification Number AQ-1, except for open abrasive blasting operations, MGS shall not discharge into the atmosphere from any single source of emissions whatsoever any contaminant for a period or periods aggregating more than three minutes in any one hour which is: a) As dark or darker in shade as that designated No. 1 on the Ringlemann Chart, as published by the United States Bureau of Mines; or

b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

For verification of the above condition of certification, MGS shall make the Malburg Generating Facility site accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains accessible for Energy Commission staff and delegate agencies or consultants.

2.14 CONDITION OF CERTIFICATION AQ-4

This condition has been removed.

2.15 CONDITION OF CERTIFICATION AQ-16

As per the Condition of Certification Number AQ-16, MGS shall install and maintain a pressure relief valve set at 25 psig in the ammonia storage tank.

For verification of the above condition of certification, MGS shall make the ammonia storage tank available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station ammonia storage tank remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.16 CONDITION OF CERTIFICATION AQ-17

As per the Condition of Certification Number AQ-17, MGS shall install and maintain a non-resettable elapsed time meter into the firewater pump to accurately indicate the elapsed operating time of the engine.

For verification of the above condition of certification, MGS shall make the firewater pump available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station firewater pump remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.17 CONDITION OF CERTIFICATION AQ-18

As per the Condition of Certification Number AQ-18, MGS shall install and maintain a non-resettable totalizing fuel meter to accurately indicate the fuel usage of the turbines.

For verification of the above condition of certification, MGS shall make the turbine fuel meters available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station firewater pump remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.18 CONDITION OF CERTIFICATION AQ-19

As per the Condition of Certification Number AQ-19, MGS shall install and maintain a flow meter to accurately indicate the flow rate of the total hourly throughput of injected

ammonia (NH3). MGS shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

For verification of the above condition of certification, MGS shall submit to CPM for approval the design drawing that clearly show the flow meter and recording device for the ammonia injection grid no less than 90 days prior to installation of the ammonia injection grid. MGS shall submit to the CPM for approval the annual calibration report for the flow meter and recording device as part of the annual compliance report.

As demonstration of compliance, MGS has submitted to CPM for approval the design drawing that clearly show the flow meter and recording device for the ammonia injection grid as scheduled. MGS will include with each annual compliance report the annual calibration records for the NH3 flow meter. The calibration report for the NH3 Flow Meter for the compliance year is provided in Appendix B. The information demonstrates that the NH3 Flow Meter has been certified.

2.19 CONDITION OF CERTIFICATION AQ-20

As per the Condition of Certification Number AQ-20, MGS shall install and maintain a temperature gauge to accurately indicate the temperature in the exhaust at the inlet to the SCR reactor. MGS shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.
For verification of the above condition of certification, MGS shall submit to CPM for approval the design drawing that clearly show the temperature gauge and recording device for the inlet to the SCR reactor no less than 90 days prior to installation of the SCR. MGS shall submit to the CPM for approval the annual calibration report for the temperature gauge and recording device as part of the annual compliance report.

As demonstration of compliance, MGS has submitted to CPM for approval the design drawing that clearly show the temperature gauge and recording device for the inlet to the SCR reactor as scheduled. MGS will include with each annual compliance report the annual calibration records for the SCR temperature gauge. The calibration report for the SCR Temperature Gauge for the compliance year is provided in Appendix C. The information demonstrates that the SCR Temperature Gauge has been certified.

2.20 CONDITION OF CERTIFICATION AQ-21

As per the Condition of Certification Number AQ-21, MGS shall install and maintain a pressure gauge to accurately indicate the differential pressure across the SCR catalyst bed in inches of water column. MGS shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.

For verification of the above condition of certification, MGS shall submit to CPM for approval the design drawing that clearly show the pressure gauge and recording device across the SCR reactor no less than 90 days prior to installation of the SCR. The City of

Vernon shall submit to the CPM for approval the annual calibration report for the pressure gauge and recording device as part of the annual compliance report.

As demonstration of compliance, MGS has submitted to CPM for approval the design drawing that clearly show the pressure gauge and recording device across the SCR reactor as scheduled. MGS will include with each annual compliance report the annual calibration records for the SCR pressure gauge. The calibration report for the SCR Pressure Gauge for the compliance year is provided in Appendix D. The information demonstrates that the SCR Pressure Gauge has been certified.

2.21 CONDITION OF CERTIFICATION AQ-23

As per the Condition of Certification Number AQ-23, MGS shall conduct source tests for the pollutants identified below:

- VOC Emissions
- SOx Emissions
- PM Emissions

For verification of the above condition of certification, MGS shall submit for approval to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. MGS shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. MGS shall submit to the District and CPM for approval the results of the source test no later than 60 days following the date of the source test.

As demonstration of compliance, MGS submits to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. MGS shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. MGS shall submit to the District and CPM for approval the results of the initial source test no later than 60 days following the date of the source test.

2.22 CONDITION OF CERTIFICATION AQ-24

As per the Condition of Certification Number AQ-24, MGS shall conduct source testing for the pollutant identified below:

-NH3 Emissions

For verification of the above condition of certification, MGS shall submit for approval to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. MGS shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. MGS shall submit to the District and CPM for approval the results of the source test no later than 60 days following the date of the source test.

As demonstration of compliance, MGS submits to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. MGS shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. MGS shall submit to the District and CPM for approval the results of the initial source test no later than 60 days following the date of the source test.

2.23 CONDITION OF CERTIFICATION AQ-25

As per the Condition of Certification Number AQ-25, MGS shall install and maintain a CEMS in each exhaust stack of the combustion turbine-HRSG trains to measure listed parameters.

For verification of the above condition of certification, MGS shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.24 CONDITION OF CERTIFICATION AQ-26

As per the Condition of Certification Number AQ-26, MGS shall install and maintain a CEMS to measure listed parameters.

For verification of the above condition of certification, MGS shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.25 CONDITION OF CERTIFICATION AQ-28

As per the Condition of Certification Number AQ-28, MGS shall vent combustion turbines and HRSGs to the CO oxidation/SCR control system whenever the turbines are in operation.

For verification of the above condition of certification, MGS shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.26 CONDITION OF CERTIFICATION AQ-29

As per the Condition of Certification Number AQ-29, MGS shall vent ammonia storage tank, during filling, only to the vessel from which it is being filled.

For verification of the above condition of certification, MGS shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.27 CONDITION OF CERTIFICATION AQ-30

As per the Condition of Certification Number AQ-30, for the purpose of the following condition number(s), “continuously record” shall be defined as recording at least once every hour and shall be calculated upon the average of the continuous monitoring for that hour. Condition of Certification **AQ-17** Condition of Certification **AQ-18**

For verification of the above condition of certification, MGS shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.28 CONDITION OF CERTIFICATION AQ-31

As per the Condition of Certification Number AQ-31, for the purpose of the following condition number(s), “continuously record” shall be defined as recording at least once every hour and shall be calculated based upon the average of the continuous monitoring for that month. Condition of Certification **AQ-19**

For verification of the above condition of certification, MGS shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.

As demonstration of compliance, the Malburg Generating Station site remains available for inspection by the District, ARB, U.S. EPA and Energy Commission.

2.29 CONDITION OF CERTIFICATION AQ-32

As per Condition of Certification AQ-32, the MGS electric generating equipment shall not be operated unless the Project Owner demonstrates to the Executive Officer that the facility holds sufficient RTCs to offset the prorated annual emissions increase for the first compliance year of operation. In addition, this equipment shall not be operated unless the City of Vernon demonstrates to the Executive Officer that, at the commencement of each compliance year after the first compliance year of operation, the facility hold sufficient RTCs in an amount equal to the annual emission increase. The Project Owner shall submit all such information to the CPM for approval.

For verification of the above condition of certification, MGS shall submit all identified evidence demonstrating compliance to the CPM on an annual basis as part of the annual compliance report.

As demonstration of compliance, the NOx RECLAIM annual emission allocation information received from the SCAQMD for the compliance year for the Bicent (California) Malburg LLC facility are provided in Appendix E.

2.30 CONDITION OF CERTIFICATION AQ-33

As per the Condition of Certification Number AQ-33, MGS shall provide to the District a source test report in accordance with listed specifications.

For verification of the above condition of certification, MGS shall submit to the CPM the required source test of Conditions of Certification **AQ-21**, **-22 and -23** in compliance with this condition.

As demonstration of compliance, MGS submitted to the CPM a copy of the 2020 Compliance Test Reports on April 20, 2020.

2.31 CONDITION OF CERTIFICATION AQ-34

As per the Condition of Certification Number AQ-34, MGS shall keep records, in a manner approved by the District, for listed parameters or items.

For verification of the above condition of certification, MGS shall make these records available to the CPM upon request.

As demonstration of compliance, MGS will make the listed records available to the CPM upon request.

2.32 CONDITION OF CERTIFICATION AQ-35

As per the Condition of Certification Number AQ-35, MGS shall keep records, in a manner approved by the District, for the date of operation, the elapsed time, in hour and the reason for operation of the emergency diesel powered generators and/or the firewater pump.

For verification of the above condition of certification, the CEC requires MGS to submit all identified evidence demonstrating compliance to the CPM on an annual basis as part of the compliance report.

As demonstration of compliance, the date of operation, the elapsed time, in hour and the reason for operation of are provided in Table 2-17. MGS refrained from testing the diesel fired emergency firewater pump on the same hour the combustion turbines were either started or shutdown.

2.33 CONDITION OF CERTIFICATION HAZ-1

As per Condition of Certification HAZ-1, the project owner shall not use any hazardous materials not listed in Appendix C of the Commission Decision Document, or in greater quantities than those identified by chemical name in Appendix C, unless approved in advance by the City of Vernon and the CPM.

For verification of the above condition of certification, the project owner shall provide to the CPM, in the annual compliance report, a list of hazardous materials contained at the facility in reportable quantities.

As demonstration of compliance, CEM provides the following list of hazardous materials stored at the facility during the compliance year in reportable quantities.

- Aqueous Ammonia 19% Concentration

2.34 CONDITION OF CERTIFICATION HAZ-6

As per Condition of Certification HAZ-6, the project owner shall require that the gas pipeline undergo a complete design review and detailed inspection every five years.

For verification of the above condition of certification, at least 30 days prior to the initial flow of gas in the pipeline, the project owner shall provide outline of the plan to accomplish a full and comprehensive pipeline design review to the CPM for review and approval. The full and complete plan shall be amended, as appropriate, and submitted to the CPM for review and approval, not later than one year before the plan is implemented by the project owner.

As demonstration of compliance, a copy of City of Vernon's Haz-6 is attached in Appendix J.

2.35 CONDITION OF CERTIFICATION HAZ-7

As per Condition of Certification HAZ-7, the project owner shall require that the gas pipeline undergo a detailed inspection after any significant seismic event in the area where surface rupturing occurs within one mile of the pipeline, or every 5 years.

For verification of the above condition of certification, at least 30 days prior to the initial flow of gas in the pipeline, the project owner shall provide a detailed plan to accomplish a full and comprehensive pipeline inspection in the event of an earthquake to the CPM for review and approval. This plan shall be reviewed and amended, as appropriate, and submitted to the CPM for review and approval, at least every five years.

As demonstration of compliance, a copy of City of Vernon's Haz-7 is attached in appendix J.

2.36 CONDITION OF CERTIFICATION WASTE-3

As per the Condition of Certification Number WASTE-3, MGS shall upon becoming aware of any impending waste management enforcement action by any local, state or federal authority, notify the CPM of any such action taken or proposed to be taken against the project itself, or against any waste haulers or disposal facility or treatment operator with which the MGS contracts.

For verification of the above condition of certification, the project owner shall notify the CPM in writing within 10 days of becoming aware of an impending enforcement action. The CPM shall notify the project owner of any changes that will be required in the manner in which project-related wastes are managed.

As demonstration of compliance, MGS hereby certifies it became aware of no impending action taken or proposed for any waste management activity related to MGS in the compliance year.

2.37 CONDITION OF CERTIFICATION WASTE-4

As per the Condition of Certification Number WASTE-4, the project owner shall prepare a Construction Waste Management Plan and an Operation Waste Management Plan for all wastes generated during construction and operation of the facility, respectively, and shall submit both plans to the City of Vernon, Environmental Health Department and the City of Vernon Fire Department for comment and to the CPM for review and approval. The plans shall contain, at a minimum, the following: A description of all waste streams, including projections of frequency, amounts generated and hazard classifications; and methods of managing each waste, including treatment methods and companies contracted with for treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/reduction plans.

For verification of the above condition of certification, no less than 30 days prior to the start of site mobilization, the project owner shall submit the Construction Waste Management Plan to the City of Vernon Environmental Health Department, City of Vernon Fire Department, and CPM. The operation waste management plan shall be submitted no less than thirty (30) days prior to the start of project operation. The project owner shall submit any required revisions within 20 days of notification by the CPM.

In the Annual Compliance Reports, the project owner shall document the actual waste management methods used during the year compared to the planned management methods.

As demonstration of compliance, submittals of the Construction Waste Management Plan and the Operation Waste Management Plan were submitted as scheduled prior to the start of project operation. No notification has been received by MGS from the CPM that revisions to the Operation Waste Management Plan are required. Actual waste management methods used during the year were consistent with planned management methods.

As verification of Condition Waste-4, Appendix J is provided.

2.38 CONDITION OF CERTIFICATION SOIL & WATER-4

As per Condition of Certification SOIL & WATER-4, the project owner shall install metering devices and record on a monthly basis the amount of water, listed by source (potable and reclaimed) used by the project. The annual summary shall include the monthly range and monthly average of daily usage in gallons per day, and total water used by the project on a monthly and annual basis in acre-feet. The annual summary shall also include the yearly range and yearly average water use by the project.

For verification of the above condition of certification, the project owner shall submit an annual water use summary to the CPM as part of its annual compliance report for the life of the project.

As demonstration of compliance, the compliance year water use summary is provided in Tables 2-18, 2-19 and 2-20 of Appendix G.

2.39 CONDITION OF CERTIFICATION SOIL & WATER-5

As per Condition of Certification Number SOIL & WATER-5, the project owner shall not use potable water for process cooling water for more than 9 days (216 hours) per calendar year.

For verification of the above condition of certification, the project owner shall include a detailed summary of all potable water and reclaimed water used for process water in the Annual Compliance Report.

As demonstration of compliance, a summary of potable water used during the compliance year is provided in Tables 2-19 of Appendix G.

2.40 CONDITION OF CERTIFICATION CUL-8

As per Condition of Certification CUL-8, the project owner shall ensure that Station A is maintained in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (1995) (36 CFR Part 68). The project owner shall provide a summary of maintenance activities completed within each calendar year.

For verification of the above condition of certification, in each annual compliance report, the project owner shall include the summary of Station A maintenance activities completed within the last calendar year.

As demonstration of compliance, a Station A Maintenance Summary Report for the compliance year is provided in Appendix F.

2.41 CONDITION OF CERTIFICATION TRANS-8

As per Condition of Certification TRANS-8, the project owner shall only use the preferred and alternate truck travel routes for deliveries of aqueous ammonia to the MGS site. The preferred route shall be from Interstate 710, exiting at the Bandini Boulevard. Trucks will then travel west along Bandini Boulevard, south on Soto Avenue, and finally west on 50th Street to the MGS. The City shall use this route unless it notifies the CPM otherwise and the CPM approves.

For verification of the above condition of certification, the project owner may alter the final truck travel route only upon prior approval of the CPM.

As demonstration of compliance, the originally mandated route and alternate route have been communicated to the aqueous ammonia supplier and use of these routes is mandated by MGS. MGS may alter the final truck travel route only upon prior approval of the CPM.

2.42 CONDITION OF CERTIFICATION VIS-1

As per Condition of Certification VIS-1, the project owner shall design and install all permanent lighting such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare, and illumination of the project, the vicinity and the nighttime sky is minimized.

For verification of the above condition of certification, at least 60 days prior to ordering any permanent exterior lighting, the project owner shall submit to the CPM for review and comment written documentation describing the lighting control measures and fixtures, hoods, shields proposed for use, and incorporate the CPM's comments in lighting equipment orders. Prior to first turbine roll, the project owner shall notify the CPM that the lighting has been completed and is ready for inspection. If the CPM notifies the project owner that modifications to the lighting are needed to minimize impacts, within 30 days of receiving that notification the project owner shall implement the modifications and notify the CPM that the modifications have been completed. The project owner shall report any complaints about permanent lighting and provide documentation of resolution in the Annual Compliance Report, accompanied by any lighting complaint resolution forms for that year.

As demonstration of compliance, written documentation describing the lighting control measures was submitted as scheduled prior to first turbine roll. The CPM was notified that the lighting had been completed and was ready for inspection. No subsequent notification has been received from the CPM that modifications to the lighting are needed to minimize impacts. MGS certifies that there were no lighting related complaints in the compliance year.

2.43 CONDITION OF CERTIFICATION VIS-2

As per Condition of Certification VIS-2, the project owner shall paint or treat the surfaces of all project structures and buildings visible to the public in a gray color to blend with the existing Station "A" building. Surfaces shall be treated with finishes that minimize glare. The project owner shall ensure proper treatment maintenance for the life of the project. For verification of the above condition of certification, at least 30 days prior to the start of commercial operation, the project owner shall notify the CPM that all buildings and structures are ready for inspection. The project owner shall provide a status report regarding treatment maintenance in the Annual Compliance Report.

As demonstration of compliance, the CPM was notified as scheduled that all buildings and structures were ready for inspection. All project structures on the MGS site are matching in color to the pre-existing structure of Station 'A'. Following maintenance activities, a gray color coating was applied where required.

2.44 CONDITION OF CERTIFICATION VIS-3

As per Condition of Certification VIS-2, the project owner shall plant trees along the east side of the MGS site to enhance views of the new power plant from Soto Street, consistent with the City of Vernon General Plan policy 1.3. The project owner shall ensure proper maintenance of the trees for the life of the project.

For verification of the above condition of certification, at least 30 days prior to the start of commercial operation, the project owner shall notify the CPM that the trees are ready for inspection. The project owner shall provide a status report regarding tree maintenance in the Annual Compliance Report.

Landscaping and tree maintenance activities are performed by the City of Vernon and included maintenance of lawns, flower beds, and trees outside Station "A". See attached CUL-8

2.45 CONDITION OF CERTIFICATION NOISE-2

As per Condition of Certification Noise-2, throughout the construction and operation of the project, the project owner shall document, investigate, evaluate, and attempt to resolve all project related noise complaints.

For verification of the above condition of certification, within 30 days of receiving a noise complaint, the project owner shall file a copy of the Noise Complaint Resolution Form, or similar instrument approved by the CPM, with The Project Owner Director of Community Services & Water and the City of Huntington Park Senior Planner and with the CPM, documenting the resolution of the complaint. If mitigation is required to resolve a complaint, and the complaint is not resolved within a 30-day period, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is finally implemented.

No Noise complaints were received during 2020. A copy of the noise complaint log is provided in Appendix H.

Table 2-10

Malburg Generating Station
2020 Annual Emissions for MGS

Contaminant	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility
CO lbs	12188	N/A	26.96	12215
NOx lbs	36818	N/A	100.54	36918
PM10 lbs	29834	517	8.85	30359
VOC lbs	7642	N/A	9.91	7652
SOx lbs	1392	N/A	5.55	1398

Table 2-17

Malburg Generating Station
Diesel Fuel Usages

Year 2020

Month	Hours of Operation			Fuel Used 11.2 gal/hr (gals)	Emissions Factor (lbs/Mgal)				
					NOX	SOX	CO	PM10	VOC
	Maintenance	Testing	Emergency		469	21	102	33.5	37.5
January	0.0	1.9	0.0	21.3	9.98	0.45	2.17	0.71	0.80
February	0.0	1.8	0.0	20.2	9.46	0.42	2.06	0.68	0.76
March	0.0	2.5	0.0	28.0	13.13	0.59	2.86	0.94	1.05
April	0.0	2.0	0.0	22.4	10.51	0.47	2.28	0.75	0.84
May	0.0	2.2	0.0	24.6	11.56	0.52	2.51	0.83	0.92
June	0.0	2.0	0.0	22.4	10.51	0.47	2.28	0.75	0.84
July	0.0	2.2	0.0	24.6	11.56	0.52	2.51	0.83	0.92
August	0.0	2.4	0.0	26.9	12.61	0.56	2.74	0.90	1.01
September	0.0	1.5	0.0	16.8	7.88	0.35	1.71	0.56	0.63
October	0.0	2.6	0.0	29.1	13.66	0.61	2.97	0.98	1.09
November	0.0	1.5	0.0	16.8	7.88	0.35	1.71	0.56	0.63
December	0.0	1.0	0.0	11.2	5.25	0.24	1.14	0.38	0.42
TOTAL	**0.0**	**23.6**	**0.0**	**264.32**	**123.97**	**5.55**	**26.96**	**8.85**	**9.91**

Note: Operations for maintenance and testing shall not exceed 50 hours in any one calendar year per air permit condition C1.5 (Sec. H, pg. 16). Fuel rate changed to 11.2 gal/hr per AQMD audit, eff 4th qtr.

APPENDIX A

MGS CEC COMMISSION DECISION COMPLIANCE MATRIX

Malburg Generating Station
CEC Conditions of Certification
Compliance Matrix

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
COM-1				Condition completely satisfied.
COM-2	Access	The project owner shall grant Energy Commission staff and delegate agencies or consultants unrestricted access to the power plant site.	None Specified	The Malburg Generating Facility site remains accessible for Energy Commission staff and delegate agencies or consultants.
COM-3	Compliance Record	The project owner shall maintain project files onsite. Energy Commission staff and delegate agencies shall be given unrestricted access to the files.	None Specified	Project files are on site. Energy Commission staff and delegate agencies are given unrestricted access to the files.
COM-4	Compliance Verification Submittals	The project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such condition was satisfied by work performed or the project owner or his agent.	None Specified	MGS is responsible for the delivery and content of all verification submittals to the CPM.
COM-5				Condition completely satisfied.
COM-6	Compliance Matrix	The project owner shall submit a compliance matrix (in a spreadsheet format) with each monthly and annual compliance report which includes the status of all compliance conditions of certification.	None Specified	This matrix satisfies the requirement and will be submitted with each annual compliance report.
COM-7				Condition completely satisfied.
COM-8	Annual Compliance Reports	After construction ends and throughout the life of the project, the project owner shall submit Annual Compliance Reports (ACRs) which include specific information. The first ACR is due after the air district has issued a Permit to Operate.	Eleven specific requirements are listed in the Decision	Reports are submitted annually as required. Responses to the eleven specific requirements are included in the Annual Fourth Quarter Compliance Report.
COM-9				Condition completely satisfied.
COM-10				Condition completely satisfied.
COM-11				Condition completely satisfied.
COM-12	Reporting of Complaints, Notices and Citations	Within 10 days of receipt, the project owner shall report to the CPM, all notices, complaints, and citations.	None Specified	MGS shall report all notices, complaints, and citations to the CPM within 10 days of receipt. If no such item is received, this is verified in each annual report.
COM-13	Planned Facility Closure	The project owner shall submit a closure plan to the CPM at least twelve months prior to commencement of a planned closure.	None Specified	MGS will submit plan as required at closure of facility. No action required until that time, but facility non-closure is affirmed in each annual report.
COM-14	Unplanned Temporary Facility Closure	To ensure that public health and safety and the environment are protected in the event of an unplanned temporary closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation. The approved plan must be in place prior to commercial	The project owner, in consultation with the CPM, will update the on-site contingency plan as necessary. The CPM may require revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Energy	MGS will review the on-site contingency plan in the annual compliance reports, and recommend changes to bring the plan up to date. In the event of an unplanned temporary closure, MGS shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
		operation of the facility and shall be kept at the site at all times.	Commission, the project owner will review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM. In the event of an unplanned temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan.	all necessary steps to implement the on-site contingency plan.
COM-15	Unplanned Permanent Facility Closure	To ensure that public health and safety and the environment are protected in the event of an unplanned permanent closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation.	All of the requirements specified for unplanned temporary closure shall also apply to unplanned permanent closure.	In the event of an unplanned permanent closure, MGS shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. No action required until that time, but facility non-closure should be affirmed in each annual report.
COM-16	Post certification changes to the Decision	The project owner must petition the Energy Commission to delete or change a condition of certification, modify the project design or operational requirements and/or transfer ownership of operational control of the facility.	None Specified	Whether or not such a submission has taken place during the prior year is addressed in each annual report.
GEN-1				Condition completely satisfied.
GEN-2				Condition completely satisfied.
GEN-3				Condition completely satisfied.
GEN-4				Condition completely satisfied.
GEN-5				Condition completely satisfied.
GEN-6				Condition completely satisfied.
GEN-7				Condition completely satisfied.
GEN-8				Condition completely satisfied.
CIVIL-1				Condition completely satisfied.
CIVIL-2				Condition completely satisfied.
CIVIL-3				Condition completely satisfied.
CIVIL-4				Condition completely satisfied.
STRUC-1				Condition completely satisfied.
STRUC-2				Condition completely satisfied.
STRUC-3				Condition completely satisfied.
STRUC-4				Condition completely satisfied.
MECH-1				Condition completely satisfied.
MECH-2				Condition completely satisfied.
MECH-3				Condition completely satisfied.
ELEC-1				Condition completely satisfied.
TSE-1				Condition completely satisfied.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
TSE-2				Condition completely satisfied.
TSE-3				Condition completely satisfied.
TSE-4				Condition completely satisfied.
TSE-5				Condition completely satisfied.
TSE-6				Condition completely satisfied.
TSE-7				Condition completely satisfied.
TSE-8				Condition completely satisfied.
TLSN-1				Condition completely satisfied.
AQ-C1				Condition completely satisfied.
AQ-C2				Condition completely satisfied.
AQ-C3				Condition completely satisfied.
AQ-C4				Condition completely satisfied.
AQ-C5	Chromium compounds	No chromium containing compounds shall be added to cooling tower circulating water.	The Project Owner shall make the site available for inspection by representatives of the District, ARB, U.S. EPA and Energy Commission.	The site remains available for inspection by representatives of the District, ARB, U.S. EPA and Energy Commission.
AQ-C6	Blowdown water	The Project Owner shall determine the TDS levels in the blowdown water by independent laboratory testing prior to initial operation and periodically thereafter.	The Project Owner shall submit for approval to the CPM, a protocol for initial and weekly testing and the identification of the independent laboratory to be used 90 days prior to cooling tower operation. The Project Owner shall submit weekly TDS reports for the blowdown water as part of the quarterly emission report to the CPM for approval.	MGS shall submit weekly TDS reports for the blowdown water as part of the quarterly emission report to the CPM for approval.
AQ-C7	PM emissions	PM10 emissions from the cooling tower (in total) shall not exceed 6.2 lb/day.	The Project Owner shall calculate the daily PM10 emissions from the cooling tower and submit all calculations and results on a quarterly basis in the quarterly emission reports to the CPM for approval.	MGS shall calculate the daily PM10 emissions from the cooling tower and submit all calculations and results on a quarterly basis in the quarterly emission reports to the CPM for approval.
AQ-C8	Firewater pump testing	The project owner shall refrain from testing the firewater pump during the same hour as either gas fired combustion turbines is in start up or shut down as defined by Condition of Certification AQ-C9.	The Project Owner shall submit to the CPM for approval all testing times and results of the diesel fired emergency firewater pump in the quarterly emissions report.	MGS shall submit to the CPM for approval all testing times and results of the diesel fired emergency firewater pump in the quarterly emissions report.
AQ-C9	Startup/Shut-down compliance	The Project Owner shall use the following definitions to determine compliance with startup, shutdown and any related emission or operational limitations. Startup is defined as beginning when fuel is first delivered to the combustors of the combustion turbine and ending when the combustion turbine reaches all NOx and CO emission limits for normal operation. Shutdown is defined as beginning during normal operation with the intent to	See Verification for Condition of Certification AQ-6.	MGS shall submit to the CPM for approval, a record of all startups and shutdowns including duration and date of occurrence on a quarterly basis as part of the quarterly emission report.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
		shutdown and ends with the secession of fuel being delivered to the combustors of the combustion turbine.		
AQ-C10	DELETED			
AQ-C11	Quarterly emissions report	The Project Owner shall submit a quarterly emissions report on a quarterly basis to the CPM for approval. The quarterly emissions report shall generally report all ammonia, NOx, SOx, CO, PM10 and VOC emissions from the Malburg Generation Station as necessary to demonstrate compliance with all emission limits. The fourth quarter emission report shall include an annual summary of all emissions of ammonia, NOx, SOx, CO, PM10 and VOC.	The Project Owner shall submit to the CPM the quarterly emissions report no less than 30 days after the end of each calendar quarter.	MGS shall submit to the CPM the quarterly emissions report no less than 30 days after the end of each calendar quarter.
AQ-C12				Condition completely satisfied.
AQ-C13	Modification to air permit	The Project Owner shall submit to the CPM for review and approval any modification proposed by either the City or issuing agency to any project air permit.	The Project Owner shall submit any proposed air permit modification to the CPM within five working days of its submittal either by the City to an agency, or receipt of proposed modifications from an agency. The Project Owner shall submit all modified air permits to the CPM within 15 days of receipt.	MGS shall submit any proposed air permit modification to the CPM within five working days of its submittal either by MGS to an agency, or receipt of proposed modifications from an agency. MGS shall submit all modified air permits to the CPM within 15 days of receipt.
AQ-C14				Condition completely satisfied.
AQ-1	Emissions discharge	Except for open abrasive blasting operations, The Project Owner shall not discharge into the atmosphere from any single source of emissions whatsoever any contaminant for a period or periods aggregating more than three minutes in any one hour as listed.	The project owner shall make the site and records available for inspection by representatives of the District, ARB, U.S. EPA, and Energy Commission upon request.	The Malburg Generating Facility site remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-2	Diesel oil containing sulfur compounds	The Project Owner shall not use diesel oil containing sulfur compounds in excess of 15 parts per million (ppm) by weight as supplied by the supplier.	The Project Owner shall submit fuel purchase records for approval to the CPM on a quarterly basis in the quarterly emissions report.	MGS shall submit fuel purchase records for approval to the CPM on a quarterly basis in the quarterly emissions report.
AQ-3	Fuel purchase records & sulfur content	The Project Owner shall keep records, in a manner approved by the District, for the following parameter(s) or item(s): Purchase records of fuel oil and sulfur content of the fuel	The Project Owner shall submit fuel purchase records for approval to the CPM on a quarterly basis in the quarterly emissions report.	MGS shall submit fuel purchase records for approval to the CPM on a quarterly basis in the quarterly emissions report.
AQ-4	Accident release prevention	Accident release prevention requirements of Section 112 (r)(7): a). The Project Owner shall comply with the accidental release prevention requirements pursuant to 40CFR Part 68 and shall submit to the Executive Officer and the CPM, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and admission of a risk management plan (RMP).	The Project Owner shall submit for approval to the CPM the above required statement of compliance and any further information requested on an annual basis as part of the annual compliance report.	This condition was removed from the petition to amend June 2019.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
		b). The Project Owner shall submit any additional relevant information requested by the Executive Officer, designated agency or CPM.		
AQ-5	Steam generator emissions	The Project Owner shall limit the emissions from both gas fired combustion turbine-heat recovery steam generator train exhaust stacks.	The Project Owner shall submit all emission calculations, fuel use, CEM records and a summary demonstrating compliance of all emission limits stated in this Condition for approval to the CPM on a quarterly basis in the quarterly emissions report.	MGS shall submit all emission calculations, fuel use, CEM records and a summary demonstrating compliance of all emission limits stated in this Condition for approval to the CPM on a quarterly basis in the quarterly emissions report.
AQ-6	2 ppm NOx, CO and VOC emission limit	Following commissioning, start-ups shall not exceed 120 minutes during a cold start-up without a trip, and 150 minutes during a cold start-up with a trip. Cold start-ups with or without a trip shall not exceed the following limits: NOx 122.8 lbs, CO 204.8 lbs and VOC 1.75 lbs. Start-ups shall not exceed 90 minutes during a non-cold start-up without a trip or 120 minutes during a non-cold start-up with a trip. Non-cold start-ups shall not exceed the following limits: NOx 51.3 lbs, CO 59.9 lbs, and VOC 1.55 lbs. Shut-downs shall not exceed 30 minutes. Shut-downs shall not exceed the following limits: NOx 4.5 lbs, CO 10.8 lbs, and VOC 0.71 lbs. The number of startups shall not exceed two per day per turbine. Written records of commissioning, start-ups and shutdowns shall be kept and made available to District and submitted to the CPM for approval.	The Project Owner shall submit to the CPM for approval, a record of all startups and shutdowns including duration and date of occurrence on a quarterly basis as part of the quarterly emission report.	MGS shall submit to the CPM for approval, a record of all startups and shutdowns including duration and date of occurrence on a quarterly basis as part of the quarterly emission report.
AQ-7	DELETED	The 2 ppm CO emission limit shall not apply during turbine commissioning, start-up and shutdown. The commissioning period shall not exceed 573 operating hours per turbine from the initial start-up. Following commissioning, start-ups shall not exceed 2 hours and the number of startups shall not exceed one per day per turbine. Following commissioning, shutdowns shall not exceed 30 minutes and the number of shutdowns shall not exceed one per day per turbine. The Project Owner shall provide the District and CPM with the written notification of the initial start-up date. Written records of commissioning, start-ups and shutdowns shall be kept and made available to District and reported for approval to the CPM.	See Verification for Condition of Certification AQ-6.	This conditioned was removed from the petition to amend June 2019.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
AQ-8	80.13 lb/mscf NOx emission limits	The 80.13 lb/mmscf NOx emission limit(s) shall only apply during interim period to report RECLAIM emissions. The interim period shall not exceed 12 months from the initial start-up date.	The Project Owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.	This condition was removed from the petition to amend June 2019.
AQ-9	2 ppmv NOx emissions limits average	The 2 ppmv NOx emissions limit(s) are averaged over 1 hour at 15 percent oxygen, dry basis.	The Project Owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.	MGS shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.
AQ-10	2 ppmv CO emission limits average	The 2 ppmv CO emission limit(s) are averaged over 1 hour at 15 percent oxygen, dry basis.	The Project Owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.	MGS shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.
AQ-11	2 ppmv VOC emission limits average	The 2 ppmv VOC emission limit(s) are averaged over 1 hour at 15 percent oxygen, dry basis.	The Project Owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.	MGS shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.
AQ-12	5 ppm NH3 emission limits average	The 5 ppm NH3 emission limit(s) are averaged over 1 hour at 15 percent oxygen, dry basis. The Project Owner shall calculate and continuously record the ammonia slip concentration using the provided formula.	The Project Owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.	MGS shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.
AQ-13	Compliance with District Rule 475	For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both emission limits at the same time.	The Project Owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.	MGS shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.
AQ-14	Engine cylinder lubricating oil	As per the Condition of Certification Number AQ-14, MGS shall only use diesel fuel containing the following specified compounds: Sulfur less than or equal to 15 ppm by weight.	The Project Owner shall submit fuel purchase records for approval to the CPM on a quarterly basis in the quarterly emissions report.	MGS shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.
AQ-15	Operating time for Diesel fueled backup generators & firewater pump	The Project Owner shall limit the operating time of the diesel fueled emergency backup generators and the firewater pump to no more than 200 hours each in any one year.	See Verification for Condition of Certification AQ-C8.	MGS shall submit to the CPM for approval all testing times and results of the diesel fired emergency firewater pump in the quarterly emissions report.
AQ-16	Pressure relief valves	The Project Owner shall install and maintain a pressure relief valve set at 25 psig in the ammonia storage tank.	The Project Owner shall make the ammonia storage tank available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The ammonia storage tank remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-17	Elapsed time meter in firewater pump	The Project Owner shall install and maintain a(n) non-resettable elapsed time meter into the firewater pump to accurately indicate the elapsed operating time of the engine.	The Project Owner shall make the firewater pump available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The firewater pump remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-18	Totalizing fuel meter	The Project Owner shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage of the turbines.	The Project Owner shall make the turbine fuel meters available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The turbine fuel meters remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
AQ-19	Injected ammonia (NH_3)	The Project Owner shall install and maintain a(n) flow meter to accurately indicate the flow rate of the total hourly throughput of injected ammonia (NH3). The Project Owner shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.	The Project Owner shall submit to CPM for approval the design drawing that clearly show the flow meter and recording device for the ammonia injection grid no less than 90 days prior to installation of the ammonia injection grid. The Project Owner shall submit to the CPM for approval the annual calibration report for the flow meter and recording device as part of the annual compliance report.	MGS shall submit to the CPM for approval the annual calibration report for the flow meter and recording device as part of the annual compliance report.
AQ-20	SCR exhaust temperature	The Project Owner shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the exhaust at the inlet to the SCR reactor. The Project Owner shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.	The Project Owner shall submit to CPM for approval the design drawing that clearly show the temperature gauge and recording device for the inlet to the SCR reactor no less than 90 days prior to installation of the SCR. The Project Owner shall submit to the CPM for approval the annual calibration report for the temperature gauge and recording device as part of the annual compliance report.	MGS shall submit to the CPM for approval the annual calibration report for the temperature gauge and recording device as part of the annual compliance report.
AQ-21	Differential pressure across SCR catalyst bed	The Project Owner shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the SCR catalyst bed in inches of water column. The Project Owner shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within plus or minus 5 percent. It shall be calibrated once every 12 months.	The Project Owner shall submit to CPM for approval the design drawing that clearly show the pressure gauge and recording device across the SCR reactor no less than 90 days prior to installation of the SCR. The Project Owner shall submit to the CPM for approval the annual calibration report for the pressure gauge and recording device as part of the annual compliance report.	MGS shall submit to the CPM for approval the annual calibration report for the pressure gauge and recording device as part of the annual compliance report.
AQ-22		The Project Owner shall conduct source test (s) for the pollutant(s) identified below: - CO Emissions - NOx Emissions - -PM Emissions VOC Emissions - SOx Emissions - NH3 Emissions	The Project Owner shall submit for approval to the District and the CPM the required initial source testing protocol no less than 45 days prior to the date of the source test. The Project Owner shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. The Project Owner shall submit to the District and CPM for approval the results of the initial source test no later than 60 days following the date of the source test.	This condition was removed from the petition to amend June 2019.
AQ-23	Source test(s) for pollutants	The Project Owner shall conduct source test(s) for the pollutant(s) identified below: - VOC Emissions - SOx Emissions - PM10 Emissions	The Project Owner shall submit for approval to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. The Project Owner shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. The Project Owner shall submit to the District and CPM for approval the results of the source test no later than	MGS shall submit for approval to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. MGS shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. MGS shall submit to the District and CPM for approval the results of the initial source test no later than 60 days following the date of the source test.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
			60 days following the date of the source test.	
AQ-24	Source test(s) for pollutants	The Project Owner shall conduct source test(s) for the pollutant(s) identified below: NH3 Emissions	The Project Owner shall submit for approval to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. The Project Owner shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. The Project Owner shall submit to the District and CPM for approval the results of the source test no later than 60 days following the date of the source test.	MGS shall submit for approval to the District and the CPM the required source testing protocol no less than 45 days prior to the date of the source test. MGS shall notify the District and CPM of the date and time of the source test no less than 10 days prior to the test. MGS shall submit to the District and CPM for approval the results of the initial source test no later than 60 days following the date of the source test.
AQ-25	Exhaust stack CEMS	The Project Owner shall install and maintain a CEMS to measure the listed parameters:	The Project Owner shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The Malburg Generating Station remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-26	CEMs	The Project Owner shall install and maintain a CEMS to measure listed parameters.	The Project Owner shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The Malburg Generating Station remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-27	Fuel usage	The Project Owner shall limit the fuel usage of each turbine-duct burner pair to no more than 405 million cubic feet in any one calendar month. The Project Owner shall keep records, in a manner approved by the District, for the operational status of the duct burners and their fuel use.	The Project Owner shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.	MGS shall submit to the CPM for approval all emissions and emission calculations on a quarterly basis as part of the quarterly emissions report.
AQ-28	Venting	The Project Owner shall vent this equipment to the CO oxidation/SCR control system whenever the turbines are in operation.	The Project Owner shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The Malburg Generating Station remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-29	Venting	The Project Owner shall vent ammonia storage tank, during filling, only to the vessel from which it is being filled.	The Project Owner shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The Malburg Generating Station remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-30	Continuously record	For the purpose of the following condition number(s), "continuously record" shall be defined as recording at least once every hour and shall be calculated upon the average of the continuous monitoring for that hour. Condition of Certification AQ-18 Condition of Certification AQ-19	The Project Owner shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The Malburg Generating Station remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-31	Continuously record	For the purpose of the following condition number(s), "continuously record" shall be defined as recording at least once every hour and shall be calculated based upon the average of the continuous monitoring for that month. Condition of Certification AQ-19	The Project Owner shall make the Malburg Generation Station available for inspection by the District, ARB, U.S. EPA and Energy Commission.	The Malburg Generating Station remains accessible for inspection to the District, ARB, U.S. EPA and Energy Commission.
AQ-32	MGS electric generating equipment	This equipment shall not be operated unless the facility holds 34,349 pounds of NOx RECLAIM Trade Credits (RTCs)	The Project Owner shall submit all identified evidence demonstrating compliance to the CPM on an annual	MGS shall submit all identified evidence demonstrating that, at the commencement of each compliance

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
		in its allocation account to offset the annual emissions increase for the first year of operation. The RTCs held to satisfy the first year of operation portion of this condition may be transferred only after one year from the initial start of operation. In addition, this equipment shall not be operated unless the operator demonstrates to the Executive Officer that, at the commencement of each compliance year after the start of operation, the facility holds 34,349 pounds of NOx RTCs valid during that compliance year. RTCs held to satisfy the compliance year portion of this condition may be transferred only after the compliance year for which the RTCs are held. If the initial or annual hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.	basis as part of the annual compliance report.	year, the facility holds sufficient RTCs in an amount equal to the annual emission increase to the CPM on an annual basis as part of the annual compliance report.
AQ-33	Source test report	The Project Owner shall provide to the District a source test report in accordance with listed specifications:	The Project Owner shall submit to the CPM the required source test of Conditions of Certification AQ-21, -22 and -23 in compliance with this condition.	MGS shall submit for approval to the District and the CPM the required source test report no later than 60 days after the source test was completed.
AQ-34	Recordkeeping	The Project Owner shall keep records, in a manner approved by the District, for listed parameters or items.	The Project Owner shall make these records available to the CPM upon request.	MGS shall make these records available to the CPM upon request.
AQ-35	Recordkeeping	The Project Owner shall keep records, in a manner approved by the District, for listed parameters or items. Condition of Certification AQ-15 Condition of Certification AQ-17	The Project Owner shall submit these records to the CPM on an annual basis in the annual compliance report.	MGS shall keep records of dates of operation, the elapsed time, in hour and the reason for operation of the emergency diesel powered generators and/or the firewater pump and shall submit these records to the CPM on an annual basis in the annual compliance report.
AQ-36	Recordkeeping	The project owner shall keep records, in a manner approved by the District, for the following parameters or items: Operational status of the duct burner and its fuel usage	The Project Owner shall make these records available to the CPM upon request.	See verification of Condition of Certification AQ-6.
AQ-37	Recordkeeping	The project owner shall operate and maintain this equipment according to the following requirements: The project owner shall change oil and filter every 500 hours of operation or annually, whichever comes first, per Sect. 63.6603(a). The operator has the option of utilizing an oil analysis as described in Sect. 63.6625(i) in order to extend the specified oil change requirement. The project owner shall inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary,	The project owner shall maintain records required by Sect. 63.6655(a), Sect. 63.6655(e), and Sect. 63.6660, as applicable, for five years. The records shall be made available to District personnel upon request.	

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
		per Sect. 63.6603(a). The project owner shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary, per Sect. 63.6603(a).		
AQ-38	Recordkeeping	The operator shall operate and maintain this equipment according to the following requirements: For the Siemens A-Plus Upgrade Project, total commissioning hours shall not exceed 56.25 hours of fired operation for each turbine from the date of initial turbine upgrade start-up. Of the 56.25 hours, commissioning hours without control shall not exceed 32.5 hours. One turbine may be commissioned at a time. The commissioning for both turbines shall be completed before normal operation for either turbine may commence. The emergency internal combustion engine for fire pump shall not be tested during the commissioning of a turbine. The certified NOx and CO CEMS shall be fully calibrated and operational. The operator shall vent this equipment to the CO oxidation catalyst and SCR control system whenever the turbine is in operation after commissioning is completed.	The operator shall maintain records to demonstrate compliance with this condition and shall make such records available to the Executive Officer upon request. The records shall be maintained for a minimum of 5 years in a manner approved by SCAQMD. The records shall include, but not be limited to, the total number of commissioning hours, number of commissioning hours without control, and natural gas fuel usage.	
AQ-39	Recordkeeping	This equipment is subject to the applicable requirements of the following Rules or Regulations: NOX Subpart KKKK, SO2 Subpart KKKK	The project owner shall make these records available to the CPM upon request.	
AQ-40	Recordkeeping	This equipment is subject to the applicable requirements of the following Rules or Regulations: NOX 40 CFR 75, SO2 40 CFR 75	The project owner shall make these records available to the CPM upon request.	
Public Health-1				Condition completely satisfied.
Worker Safety-1				Condition completely satisfied.
Worker Safety-2				Condition completely satisfied.
HAZ-1	Use of hazardous materials	The project owner shall not use any hazardous materials not listed in Appendix C, below, or in greater quantities than those identified by chemical name in Appendix C, below, unless approved in advance by City of Vernon and the CPM.	The project owner shall provide to the Compliance Project Manager (CPM), in the Annual Compliance Report, a list of hazardous materials contained at the facility in reportable quantities.	MGS shall provide to the Compliance Project Manager (CPM), in the Annual Compliance Report, a list of hazardous materials contained at the facility in reportable quantities.
HAZ-2				Condition completely satisfied.
HAZ-3				Condition completely satisfied.
HAZ-4				Condition completely satisfied.
HAZ-5				Condition completely satisfied.
HAZ-6	Gas pipeline review	The project owner shall require that the gas pipeline undergo a complete design review and detailed inspection 30 days after initial startup and every 5 years thereafter.	At least 30 days prior to the initial flow of gas in the pipeline, the project owner shall provide outline of the plan to accomplish a full and comprehensive pipeline design	The initial requirement of the Condition has been completed during construction. Ongoing inspections are performed by the City of Vernon.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
			review to the CPM for review and approval. The full and complete plan shall be amended, as appropriate, and submitted to the CPM for review and approval, not later than one year before the plan is implemented by the project owner.	
HAZ-7	Seismic event inspections	After any significant seismic event in the area where surface rupture occurs within one mile of the pipeline, the gas pipeline shall be inspected by the project owner.	At least 30 days prior to the initial flow of gas in the pipeline, the project owner shall provide a detailed plan to accomplish a full and comprehensive pipeline inspection in the event of an earthquake to the CPM for review and approval. This plan shall be reviewed and amended, as appropriate, and submitted to the CPM for review and approval, at least every five years.	The initial requirement of the Condition has been completed during construction. Ongoing inspections are performed by the City of Vernon.
HAZ-8				Condition completely satisfied.
WASTE-1				Condition completely satisfied.
WASTE-2				Condition completely satisfied.
WASTE-3	Impending waste management related enforcement action	Upon becoming aware of any impending waste management related enforcement action by any local, state, or federal authority, the project owner shall notify the CPM of any such action taken or proposed to be taken against the project itself, or against any waste hauler or disposal facility or treatment operator with which the owner contracts.	The project owner shall notify the CPM in writing within 10 days of becoming aware of an impending enforcement action. The CPM shall notify the project owner of any changes that will be required in the manner in which project-related wastes are managed.	MGS shall notify the CPM in writing within 10 days of becoming aware of an impending enforcement action. The CPM shall notify the project owner of any changes that will be required in the manner in which project-related wastes are managed. If no such enforcement action occurs, this fact should be verified in each annual report.
WASTE-4	Construction & operation waste management plan	The project owner shall prepare a Construction Waste Management Plan and an Operation Waste Management Plan for all wastes generated during construction and operation of the facility, respectively, and shall submit both plans to The Project Owner. Environmental Health Department and The Project Owner Fire Department for comment and to the CPM for review and approval.	In the Annual Compliance Reports, the project owner shall document the actual waste management methods used during the year compared to the planned management methods.	In the Annual Compliance Reports, MGS shall document the actual waste management methods used during the year compared to the planned management methods.
SOIL & WATER-1				Condition completely satisfied.
SOIL & WATER-2				Condition completely satisfied.
SOIL & WATER-3				Condition completely satisfied.
SOIL & WATER-4	Water usage metering & recording	The project owner shall install metering devices and record on a monthly basis the amount of water, listed by source (potable and reclaimed) used by the project. The annual summary shall include the monthly range and monthly average of daily usage in gallons per day, and total water used by the project on a monthly and annual basis in acre-feet.	The project owner shall submit an annual water use summary to the CPM as part of its annual compliance report for the life of the project.	MGS shall submit an annual water use summary to the CPM as part of its annual compliance report for the life of the project.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
		The annual summary shall also include the yearly range and yearly average water use by the project. This information shall be supplied to the CPM.		
SOIL & WATER-5	Potable water usage	The project owner shall not use potable water for process cooling water for more than 9 days (216 hours) per calendar year.	The project owner shall include a detailed summary of all potable water and reclaimed water used for process water in the Annual Compliance Report. If use of potable water exceeds 9 days per year, the project owner shall be subject to noncompliance procedures and enforcement action described in the General Compliance Conditions.	MGS shall include a detailed summary of all potable water and reclaimed water used for process water in the Annual Compliance Report.
SOIL/ WATER-6				Condition completely satisfied.
SOIL/ WATER-7				Condition completely satisfied.
CUL-1				Condition completely satisfied.
CUL-2				Condition completely satisfied.
CUL-3				Condition completely satisfied.
CUL-4				Condition completely satisfied.
CUL-5				Condition completely satisfied.
CUL-6				Condition completely satisfied.
CUL-7				Condition completely satisfied.
CUL-8	Station A	The project owner shall ensure that Station A is maintained in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (1995) (36 CFR Part 68). The project owner shall provide a summary of maintenance activities completed within each calendar year.	In each annual compliance report, the project owner shall include the summary of Station A maintenance activities completed within the last calendar year.	MGS shall submit a summary of observed Station A maintenance activities completed within the last calendar year by City of Vernon personnel or contractors.
PAL-1				Condition completely satisfied.
PAL-2				Condition completely satisfied.
PAL-3				Condition completely satisfied.
PAL-4				Condition completely satisfied.
PAL-5				Condition completely satisfied.
PAL-6				Condition completely satisfied.
PAL-7				Condition completely satisfied.
LAND-1				Condition completely satisfied.
LAND-2				Condition completely satisfied.
TRANS-1				Condition completely satisfied.
TRANS-2				Condition completely satisfied.
TRANS-3				Condition completely satisfied.
TRANS-4				Condition completely satisfied.
TRANS-5				Condition completely satisfied.
TRANS-6				Condition completely satisfied.
TRANS-7				Condition completely satisfied.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
TRANS-8	Truck travel routes for aqueous ammonia	The Project Owner shall only use the preferred and alternate truck travel routes for deliveries of aqueous ammonia to the MGS site. The preferred route shall be from Interstate 710, exiting at the Bandini Boulevard. Trucks will then travel west along Bandini Boulevard, south on Soto Avenue, and finally west on 50th Street to the MGS. The City shall use this route unless it notifies the CPM otherwise and the CPM approves.	The final preferred and alternative truck travel routes for aqueous ammonia delivery will be submitted to the Compliance Project Manager for approval 30 days prior to the first delivery of aqueous ammonia to the MGS. During operations, the City may alter the final truck travel route only upon prior approval of the CPM.	The originally mandated route and alternate route have been communicated to the aqueous ammonia supplier and use of these routes is mandated by MGS. MGS may alter the final truck travel route only upon prior approval of the CPM.
TRANS-9				Condition completely satisfied.
VIS-1	Lighting installation	The project owner shall design and install all permanent lighting such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project, the vicinity, and the nighttime sky is minimized.	The project owner shall report any complaints about permanent lighting and provide documentation of resolution in the Annual Compliance Report, accompanied by any lighting complaint resolution forms for that year.	MGS shall report any complaints about permanent lighting and provide documentation of resolution in the Annual Compliance Report, accompanied by any lighting complaint resolution forms for that year.
VIS-2	Structure paint	The project owner shall paint or treat the surfaces of all project structures and buildings visible to the public in a gray color to blend with the existing Station A building. Surfaces shall be treated with finishes that minimize glare. The project owner shall ensure proper treatment maintenance for the life of the project.	At least 30 days prior to the start of commercial operation, the project owner shall notify the CPM that all buildings and structures are ready for inspection. The project owner shall provide a status report regarding treatment maintenance in the Annual Compliance Report.	MGS shall provide a status report regarding treatment maintenance in the Annual Compliance Report.
VIS-3	Tree planting	The project owner shall plant trees along the east side of the MGS site to enhance views of the new power plant from Soto Street, consistent with The Project Owner General Plan policy 1.3. The project owner shall ensure proper maintenance of the trees for the life of the project.	At least 30 days prior to the start of commercial operation, the project owner shall notify the CPM that the trees are ready for inspection. The project owner shall provide a status report regarding tree maintenance in the Annual Compliance Report.	MGS shall provide a status report regarding tree maintenance in the Annual Compliance Report.
VIS-4				Condition completely satisfied.
NOISE-1				Condition completely satisfied.
NOISE-2	Noise complaints	Throughout the construction and operation of the project, the project owner shall document, investigate, evaluate, and attempt to resolve all project related noise complaints.	Within 30 days of receiving a noise complaint, the project owner shall file a copy of the Noise Complaint Resolution Form, or similar instrument approved by the CPM, with The Project Owner Director of Community Services & Water and the City of Huntington Park Senior Planner and with the CPM, documenting the resolution of the complaint. If mitigation is required to resolve a complaint, and the complaint is not resolved within a 30-day period, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is finally implemented.	Within 30 days of receiving a noise complaint, MGS shall file a copy of the Noise Complaint Resolution Form, or similar instrument approved by the CPM, with The Project Owner Director of Community Services & Water and the City of Huntington Park Senior Planner and with the CPM, documenting the resolution of the complaint. If no such complaint is received, this fact should be verified in each annual report.
NOISE-3				Condition completely satisfied.
NOISE-4				Condition completely satisfied.
NOISE-5				Condition completely satisfied.

Condition #	Subject	Condition Description	Means of Verification	Methods & Comments
NOISE-6				Condition completely satisfied.
NOISE-7				Condition completely satisfied.
NOISE-8				Condition completely satisfied.

APPENDIX B

NH3 FLOW METER CALIBRATION RESULTS

Rosemount Service
8200 Market Blvd.
Chanhassen, MN 55317
T: 800-654-7768
F: 952-906-8844

EMERSON.
Process Management

March 27, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Pressure Transmitter	**Serial Number: 1287778**
Device Tag: 11 HSJJ50 CF0100 FT FIT 18	**Range: 0.274 To 10.274 IN H2O**
Model: 3051CD1A02A1AS5M5Q4E5	

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range IN H2O	Applied % Of Span	Applied IN H2O	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In IN H2O	Measured Analog Output In mA	Pass/Fail
0.274	0.00	0.274	4.0000	0.016	-1.768	3.8990	Fail
2.774	25.00	2.774	12.0000	0.016	0.749	8.2300	Fail
5.274	50.00	5.274	15.3137	0.016	3.147	12.9600	Fail
7.774	75.00	7.774	17.8564	0.016	5.610	16.0710	Fail
10.274	100.00	10.274	20.0000	0.016	8.281	18.3120	Fail

As Left Calibration Data

0.274	0.00	0.274	4.0000	0.016	0.274	4.0000	Pass
2.774	25.00	2.774	12.0000	0.016	2.780	12.0020	Pass
5.274	50.00	5.274	15.3137	0.016	5.280	15.3160	Pass
7.774	75.00	7.774	17.8564	0.016	7.780	17.8550	Pass
10.274	100.00	10.274	20.0000	0.016	10.280	20.0020	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 27, 2020
Date

Rosemount Service
8200 Market Blvd.
Chanhassen, MN 55317
T: 800-654-7768
F: 952-906-8844

EMERSON.
Process Management

March 27, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Pressure Transmitter	**Serial Number: 1292706**
Device Tag: 21 HSJ50 CF010 FT	**Range: 0 To 10 IN H2O**
Model: 3051CD1A02A1AS5M5Q4E5	

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range IN H2O	Applied % Of Span	Applied IN H2O	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In IN H2O	Measured Analog Output In mA	Pass/Fail
0.000	0.00	0.000	4.0000	0.016	-0.004	3.9930	Pass
2.500	25.00	2.500	12.0000	0.016	2.440	11.9800	Fail
5.000	50.00	5.000	15.3137	0.016	4.950	15.0850	Fail
7.500	75.00	7.500	17.8564	0.016	7.420	17.8340	Fail
10.000	100.00	10.000	20.0000	0.016	9.840	19.8760	Fail

As Left Calibration Data

0.000	0.00	0.000	4.0000	0.016	0.000	4.0000	Pass
2.500	25.00	2.500	12.0000	0.016	2.501	12.0010	Pass
5.000	50.00	5.000	15.3137	0.016	5.010	15.3250	Pass
7.500	75.00	7.500	17.8564	0.016	7.501	17.8570	Pass
10.000	100.00	10.000	20.0000	0.016	10.010	20.0000	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 27, 2020
Date

APPENDIX C

SCR TEMPERATURE GAUGE CALIBRATION REPORT

Rosemount Service
8200 Market Blvd.
Chanhassen, MN 55317
T: 800-654-7768
F: 952-906-8844

March 26, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Temperature Transmitter	**Serial #: 9029700**	**Range: 0 to 800 Deg. F**
Device Tag: 11HBK70CT030	**Sensor Type: PT-100 (x = 0.00385)**	
Model: YTA110		

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range Deg F	Applied % Of Span	Applied Deg F	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In F	Measured Analog Output In mA	Pass/Fail
0.00	0.00	0.00	4.0000	0.007	0.00	3.9940	Pass
200.00	25.00	200.00	8.0000	0.007	199.84	7.9940	Pass
400.00	50.00	400.00	12.0000	0.007	399.87	11.9980	Pass
600.00	75.00	600.00	16.0000	0.007	599.82	15.9960	Pass
800.00	100.00	800.00	20.0000	0.007	800.00	20.0000	Pass

As Left Calibration Data

0.00	0.00	0.00	4.0000	0.007	0.00	3.9940	Pass
200.00	25.00	200.00	8.0000	0.007	199.84	7.9940	Pass
400.00	50.00	400.00	12.0000	0.007	399.87	11.9980	Pass
600.00	75.00	600.00	16.0000	0.007	599.82	15.9960	Pass
800.00	100.00	800.00	20.0000	0.007	800.00	20.0000	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 26, 2020
Date

Rosemount Service
8200 Market Blvd.
Chanhassen, MN 55317
T: 800-654-7768
F: 952-906-8844

March 27, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Temperature Transmitter	**Serial #: 9029699**	**Range: 0 to 800 Deg. F**
Device Tag: 21HBK70CT030	**Sensor Type: PT-100 (x = 0.00385)**	
Model: YTA110		

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range Deg F	Applied % Of Span	Applied Deg F	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In F	Measured Analog Output In mA	Pass/Fail
0.00	0.00	0.00	4.0000	0.007	0.15	3.9980	Pass
200.00	25.00	200.00	8.0000	0.007	199.85	7.9960	Pass
400.00	50.00	400.00	12.0000	0.007	399.91	11.9980	Pass
600.00	75.00	600.00	16.0000	0.007	599.93	15.9980	Pass
800.00	100.00	800.00	20.0000	0.007	799.87	19.9970	Pass

As Left Calibration Data

0.00	0.00	0.00	4.0000	0.007	0.15	3.9980	Pass
200.00	25.00	200.00	8.0000	0.007	199.85	7.9960	Pass
400.00	50.00	400.00	12.0000	0.007	399.91	11.9980	Pass
600.00	75.00	600.00	16.0000	0.007	599.93	15.9980	Pass
800.00	100.00	800.00	20.0000	0.007	799.87	19.9970	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 27, 2020
Date

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Chanhassen, MN 55317
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F: 952-906-8844

March 27, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Temperature Transmitter	**Serial #: 9029664**	**Range: 0 to 800 Deg. F**
Device Tag: 21HBK70CT031	**Sensor Type: PT-100 (x = 0.00385)**	
Model: YTA110		

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range Deg F	Applied % Of Span	Applied Deg F	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In F	Measured Analog Output In mA	Pass/Fail
0.00	0.00	0.00	4.0000	0.007	0.15	4.0030	Pass
200.00	25.00	200.00	8.0000	0.007	200.07	8.0010	Pass
400.00	50.00	400.00	12.0000	0.007	400.16	12.0020	Pass
600.00	75.00	600.00	16.0000	0.007	600.12	16.0020	Pass
800.00	100.00	800.00	20.0000	0.007	800.02	20.0030	Pass

As Left Calibration Data

0.00	0.00	0.00	4.0000	0.007	0.15	4.0030	Pass
200.00	25.00	200.00	8.0000	0.007	200.07	8.0010	Pass
400.00	50.00	400.00	12.0000	0.007	400.16	12.0020	Pass
600.00	75.00	600.00	16.0000	0.007	600.12	16.0020	Pass
800.00	100.00	800.00	20.0000	0.007	800.02	20.0030	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 27, 2020
Date

Rosemount Service
8200 Market Blvd.
Chanhassen, MN 55317
T: 800-654-7768
F: 952-906-8844

March 27, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Temperature Transmitter	**Serial #: 9029687**	**Range: 0 to 800 Deg. F**
Device Tag: 11HBK70CT031	**Sensor Type: PT-100 (x = 0.00385)**	
Model: YTA110		

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range Deg F	Applied % Of Span	Applied Deg F	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In F	Measured Analog Output In mA	Pass/Fail
0.00	0.00	0.00	4.0000	0.007	0.16	4.0040	Pass
200.00	25.00	200.00	8.0000	0.007	200.12	8.0030	Pass
400.00	50.00	400.00	12.0000	0.007	400.16	12.0040	Pass
600.00	75.00	600.00	16.0000	0.007	600.17	16.0040	Pass
800.00	100.00	800.00	20.0000	0.007	800.15	20.0040	Pass

As Left Calibration Data

0.00	0.00	0.00	4.0000	0.007	0.16	4.0040	Pass
200.00	25.00	200.00	8.0000	0.007	200.12	8.0030	Pass
400.00	50.00	400.00	12.0000	0.007	400.16	12.0040	Pass
600.00	75.00	600.00	16.0000	0.007	600.17	16.0040	Pass
800.00	100.00	800.00	20.0000	0.007	800.15	20.0040	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 27, 2020
Date

APPENDIX D

SCR PRESSURE GAUGE CALIBRATION REPORT

Rosemount Service
8200 Market Blvd.
Chanhassen, MN 55317
T: 800-654-7768
F: 952-906-8844

EMERSON.
Process Management

March 26, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Pressure Transmitter	**Serial Number: 2161036**
Device Tag: 170CP010	**Range: 0 To 2.5 IN H2O**
Model: EJA110A	

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range IN H2O	Applied % Of Span	Applied IN H2O	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In IN H2O	Measured Analog Output In mA	Pass/Fail
0.000	0.00	0.000	4.0000	0.082	-0.008	3.9950	Pass
0.625	25.00	0.625	12.0000	0.082	0.622	11.9980	Pass
1.250	50.00	1.250	15.3137	0.082	1.249	15.3090	Pass
1.875	75.00	1.875	17.8564	0.082	1.875	17.8570	Pass
2.500	100.00	2.500	20.0000	0.082	2.500	20.0010	Pass

As Left Calibration Data

0.000	0.00	0.000	4.0000	0.082	-0.008	3.9950	Pass
0.625	25.00	0.625	12.0000	0.082	0.622	11.9980	Pass
1.250	50.00	1.250	15.3137	0.082	1.249	15.3090	Pass
1.875	75.00	1.875	17.8564	0.082	1.875	17.8570	Pass
2.500	100.00	2.500	20.0000	0.082	2.500	20.0010	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 26, 2020
Date

Rosemount Service
8200 Market Blvd.
Chanhassen, MN 55317
T: 800-654-7768
F: 952-906-8844

EMERSON.
Process Management

March 26, 2020

CALIBRATION DATA SHEET

Consistent with ISO 10474 2.1 or EN 10204 2.1

Contact Information

Purchase Order:	MGS15782	**Service Request:**	1692384
Customer Name:	Colorado Energy Management LLC	**Quote#:**	AEIA-14CVD0L
Location/Project:	0	**Sales Representative:**	RICHARD TSE
Address 1:	4963 S Soto StVernon, CA 90058	**Phone:**	6613453675
Address 2:		**Email:**	Richard.Tse@emerson.con
Customer Contact:	Ian Everts	**Service Representative:**	Stevie Day
Phone:	323-350-3481	**Phone:**	657-291-4328
Email:	ieverts@heorotpower.com	**Email:**	Stevie.Day@emerson.com

Device Information

Device Type: Pressure Transmitter	**Serial Number: 2161035**
Device Tag: 270CP010	**Range: 0 To 2.5 IN H2O**
Model: EJA110A	

Test Equipment Used

Asset #	Description	Calibration Due
ES-01410	FLUKE 754	7-Jan-21
PS-01477	FLUKE 750PDS2	3-Dec-20
PS-01266	FLUKE 700PD3	2-Oct-20
PS-01349	FLUKE 700PD7	2-Oct-20

As Found Calibration Data

Specified Range IN H2O	Applied % Of Span	Applied IN H2O	Specified Analog Output In mA	Output Tolerance +/-	Indicated Digital Output In IN H2O	Measured Analog Output In mA	Pass/Fail
0.000	0.00	0.000	4.0000	0.082	0.002	4.0170	Pass
0.625	25.00	0.625	8.0000	0.082	0.628	8.0300	Pass
1.250	50.00	1.250	12.0000	0.082	1.251	12.0030	Pass
1.875	75.00	1.875	16.0000	0.082	1.880	16.0020	Pass
2.500	100.00	2.500	20.0000	0.082	2.501	20.0020	Pass

As Left Calibration Data

0.000	0.00	0.000	4.0000	0.082	0.002	4.0170	Pass
0.625	25.00	0.625	8.0000	0.082	0.628	8.0300	Pass
1.250	50.00	1.250	12.0000	0.082	1.251	12.0030	Pass
1.875	75.00	1.875	16.0000	0.082	1.880	16.0020	Pass
2.500	100.00	2.500	20.0000	0.082	2.501	20.0020	Pass

Certification

This is to validate that the listed product performs within the acceptable performance variation of the test equipment. Measuring and test equipment used in the inspection and validation of the listed product are traceable to the National Institute of Standards and Technology.

Stevie Day

Stevie Day
Rosemount Service Representative
PH: 657-291-4328

March 26, 2020
Date

APPENDIX E
MGS RECLAIM ANNUAL EMISSION ALLOCATION

FACILITY PERMIT TO OPERATE
BICENT (CALIFORNIA) MALBURG LLC

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin (month/year)	Year End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC[1] Holding as of 07/01/2020 (pounds)	Non-Tradable[2] Non-Usable RTCs (pounds)
7/2017	6/2018	Coastal	28480	11960	0
1/2018	12/2018	Coastal	0	14325	940
7/2018	6/2019	Coastal	28480	13236	940
1/2019	12/2019	Coastal	0	23132	940
7/2019	6/2020	Coastal	28480	23132	940
1/2020	12/2020	Coastal	0	21279	1854
7/2020	6/2021	Coastal	28480	21278	1854
1/2021	12/2021	Coastal	0	19398	1881
7/2021	6/2022	Coastal	28480	19397	1881
1/2022	12/2022	Coastal	0	15663	3735
7/2022	6/2023	Coastal	28480	15663	3734
1/2023	12/2023	Coastal	0	15663	0
7/2023	6/2024	Coastal	28480	15663	0
1/2024	12/2024	Coastal	0	15663	0
7/2024	6/2025	Coastal	28480	15663	0
1/2025	12/2025	Coastal	0	15663	0
7/2025	6/2026	Coastal	28480	15663	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.

2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

FACILITY PERMIT TO OPERATE
BICENT (CALIFORNIA) MALBURG LLC

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin (month/year)	Year End	Zone	NOx RTC Initially Allocated	NOx RTC[1] Holding as of 07/01/2020 (pounds)	Non-Tradable[2] Non-Usable RTCs (pounds)
1/2026	12/2026	Coastal	0	15663	0
7/2026	6/2027	Coastal	28480	15663	0
1/2027	12/2027	Coastal	0	15663	0
7/2027	6/2028	Coastal	28480	15663	0
1/2028	12/2028	Coastal	0	15663	0
7/2028	6/2029	Coastal	28480	15663	0
1/2029	12/2029	Coastal	0	15663	0
7/2029	6/2030	Coastal	28480	15663	0
1/2030	12/2030	Coastal	0	15663	0
7/2030	6/2031	Coastal	28480	15663	0
1/2031	12/2031	Coastal	0	15663	0
7/2031	6/2032	Coastal	28480	15663	0
1/2032	12/2032	Coastal	0	15663	0
7/2032	6/2033	Coastal	28480	15663	0
1/2033	12/2033	Coastal	0	15663	0
7/2033	6/2034	Coastal	28480	15663	0
1/2034	12/2034	Coastal	0	15663	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.

2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

FACILITY PERMIT TO OPERATE
BICENT (CALIFORNIA) MALBURG LLC

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin (month/year)	Year End	Zone	NOx RTC Initially Allocated	NOx RTC[1] Holding as of 07/01/2020 (pounds)	Non-Tradable[2] Non-Usable RTCs (pounds)
7/2034	6/2035	Coastal	28480	15663	0
1/2035	12/2035	Coastal	0	15663	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.

2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

FACILITY PERMIT TO OPERATE
BICENT (CALIFORNIA) MALBURG LLC

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year Begin (month/year)	Year End (month/year)	Zone	NOx RTC Starting Allocation (pounds)	Non-Tradable Credits(NTC) (pounds)
7/1994	6/1995	Coastal	296280	7720

APPENDIX F

STATION “A” MAINTENANCE REPORT – COV CUL-8

City of Vernon

4305 Santa Fe Avenue, Vernon, California 90058
Telephone (323) 583-8811

January 14, 2021

Mr. Anwar Ali
Compliance Project Manager
Siting, Transmission & Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512

Subject: **Malburg Generating Station (Docket 01-AFC-25C)**
2020 Annual Compliance Report (CUL-8)

Dear Mr. Ali:

Enclosed are five copies of the 2020 annual compliance report for the Malburg Generating Station Condition of Certification Number CUL-8. Although Malburg Generating Station is now owned by Bicent (California) Malburg LLC, Vernon Public Utilities is submitting this report because it has retained ownership of Station "A".

Please contact Lisa Umeda at (323) 583-8811 ext. 561 (email address: LUmeda@ci.vernon.ca.us) or Elyse Engel at (702) 354-2648 (email address: Elyse.Engel@jacobs.com) if you have any questions about this report or if you need additional information.

Sincerely,

Abraham Alemu

Abraham Alemu
General Manager of Vernon Public Utilities

cc: Lisa Umeda
Todd Dusenberry
Don Quiroz
Elyse Engel

ANNUAL COMPLIANCE REPORT
CONDITION OF CERTIFICATION NUMBER
CUL-8, YEAR 2020

For the:

MALBURG GENERATING STATION
(Docket 01-AFC-25C)

Submitted To:

CALIFORNIA ENERGY COMMISSION
1516 Ninth Street, MS-15
Sacramento, CA 95814

Prepared by:

Vernon Public Utilities
4305 Santa Fe Avenue
Vernon, CA 90058

MALBURG GENERATING STATION
ANNUAL COMPLIANCE REPORT
CONDITION OF CERTIFICATION NUMBER CUL-8
YEAR 2020

INTRODUCTION

Vernon Public Utilities (VPU) has been operating an electric power generating facility (Station "A") since 1933 in the City of Vernon. The facility consists of the Johnson & Heinze Diesel Plant and H. Gonzales Generating Station. VPU constructed Malburg Generating Station (MGS) at the Station "A" facility in 2005 (01-AFC-25C). The commissioning of MGS was completed in October 2005 and the power plant was put under commercial operation on October 17, 2005. VPU sold MGS to Bicent (California) Malburg LLC (Bicent) in 2008. After the sale of MGS, VPU continued to retain ownership of the Johnson & Heinze Diesel Plant, H. Gonzales Generating Station, and Station "A" building.

Condition of Certification Number CUL-8 requires VPU to maintain the Station "A" building as an Historic Property in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, which include standards for preservation, rehabilitation, restoration, and reconstruction, as codified in Title 36 of the Code of Federal Regulations (CFR), Part 68 (1995). Each of the standards can be applied to an historic property to assist the long-term preservation of a property's significance through the retention of historic materials and features.

The Station "A" building is still in use and no major changes or alterations occurred to the building in 2020. Only routine maintenance occurred in 2020, in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

To verify that the Station "A" building is maintained in accordance with the Standards for the Treatment of Historic Properties (36 CFR Part 68), the California Energy Commission (CEC) requires VPU to submit an annual report that summarizes the maintenance activities completed to preserve the property within each calendar year. VPU is, therefore, submitting this annual compliance report, which provides a summary of the maintenance activities completed for the Station "A" building during 2020.

COMPLIANCE DETAILS FOR CONDITION OF CERTIFICATION NUMBER CUL-8

As per Condition of Certification Number CUL-8, the project owner shall ensure that Station "A" is maintained in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68). The project owner shall provide a summary of maintenance activities completed within each calendar year. These maintenance activities were completed in accordance with the Secretary of the Interior's Standards for Preservation, as detailed in 36 CFR Part 68, and sustained the historic use and appearance of the building; did not alter or diminish its historic character, materials, features, or spaces; avoided use of abrasive chemical or physical treatments; and preserved its craftsmanship.

For verification of the above condition of certification, the project owner shall include the summary of Station "A" maintenance activities completed to preserve the Station "A" building within the calendar year. A summary of the maintenance activities completed by VPU during the year 2020 is presented below.

Maintenance Activities Completed to Preserve the Exterior of the Station "A" Building:

1. **Weekly Maintenance of the Exterior of Station "A"**
    a. Cleaning of 50th Street, Seville Avenue and parking lot, and outside areas to the north and east of the building.
    b. Maintenance of lawns, flower beds, and trees provided outside the Station "A" building, including the mowing of lawns.
2. **Monthly Maintenance of the Exterior of Station "A"**

    Sweeping of the following roads: (a) northeast access road from Seville Avenue to the northeast corner of the building, (b) south access road from 50th Street to the northeast corner of the building, (c) 50th Street access gate to Seville Avenue, and (d) Seville Avenue access gate to 50th Street.
3. **Quarterly Maintenance of the Exterior of Station "A"**

    Inspection of the following items: (a) lighting, (b) wastewater separator, (c) safety systems, and (d) compressor backflow catch basin.
4. **Annual Maintenance of the Exterior of Station "A"**
    a. A visual inspection of the Station "A" building (exterior inspection) was conducted to determine if maintenance repairs were required.
    b. Roof drains were inspected and cleaned.
    c. First floor exterior windows were cleaned.

Maintenance Activities Completed to Preserve the Interior of the Station "A" Building:

1. **Daily Maintenance of the Interior of Station "A"**

    Sweeping and mopping of floors (control room, west offices and hallway, east offices and hallway, and dressing room and lavatory).
2. **Weekly Maintenance of the Interior of Station "A"**

    Sweeping and mopping of floors (battery charger room, basement, west 7-kilovolt [kV] room, east 7-kV room, main floor, 480-volt room, operations manager office, control room, machine shop, and piping gallery). Waxing of floors (control room and main floor hallways).
3. **Monthly Maintenance of the Interior of Station "A"**

    Elevator inspection, fire extinguisher inspections, automated external defibrillator (AED) inspection, and eye wash inspections.
4. **Quarterly Maintenance of the Interior of Station "A"**

    Inspection of the following items: (a) crane, (b) lighting, (c) spill cabinet, (d) exit sign emergency lighting, (e) safety systems, (f) smoke detectors, (g) maintenance of air

conditioner units, (h) hot sticks and high voltage gloves used for switching and hot work, and (g) first aid kits.

5. **Semi-Annual Maintenance of the Interior of Station "A"**
    a. Waxing of floors (480-volt room, operations manager office, piping gallery, main floor, west 7-kV room, east 7-kV room, basement, battery charger room, machine shop, muffler deck, engine room, and air washer deck).
    b. Inspection of the east and west 7-kV room fire suppression system.
6. **Annual Maintenance of the Interior of Station "A"**
    a. Testing of potable water backflow device.
    b. Verification of safety data sheet (SDS) book.

Security of the Station "A" Building:

The security system at the Station "A" complex includes 23 high definition (HD) infrared cameras with digital video recording (DVR), 21 of which are physically located on the Station "A" building. Managers and control room staff can access the camera system to monitor any suspicious activity at Station "A". The camera system also helps identify the vehicles, drivers, passengers, and license plates entering the Soto Street and Seville Avenue gates. This camera system was last modified in 2019, and details were included in the 2019 MGS Annual Compliance Report.

The Station "A" building also includes a 24/7 security guard and a locked gate at the Soto Street entrance. The security guard screens visitors seeking access to Station "A", and the control room staff have the ability to screen visitors through the camera system at both the Soto Street and Seville Avenue entrance gates, as well as through an audible intercom system at the Soto Street entrance gate. The facility security restricts access to Station "A" to authorized personnel, consistent with Condition of Certification Number COM-9's Operational Security Plan and industry standards. Exterior and interior doors to Station "A" are accessed via use of a card key issued by the City of Vernon Police Department. All visitors to the facility are recorded in the Visitors and Systems Logs. Monthly checks are performed on all entrance and exit security doors.

APPENDIX G

POTABLE AND RECLAIM WATER USAGE

Table 2-18

Yearly Water Use Totals

Year	Reclaim Water Used (gal)	(cu. ft.)	(acre-feet)
2020	253,145,819	33,838,500	776.825
2019	211,811,049	28,313,200	649.982
2018	183,802,933	24,569,300	564.034
2017	233,471,537	31,208,600	716.451
2016	260,574,452	34,831,500	799.621
2015	249,217,545	33,313,400	764.770
2014	286,933,755	38,355,000	880.510
2013	257,708,480	34,448,400	790.826
2012	231,756,143	30,979,300	711.187
Average	**240,935,746**		

Year	Potable Water Used (gal)	(cu. ft.)	(acre-feet)
2020	82,291	11,000	0.253
2019	421,180	56,300	1.292
2018	70,321	9,400	0.216
2017	1,220,899	163,200	3.747
2016	195,254	26,100	0.599
2015	412,203	55,100	1.265
2014	58,352	7,800	0.179
2013	0	0	0.000
2012	3,288,648	439,600	10.092
Average	**638,794**		

Table 2-19

Malburg Generating Station
Potable Water Usage During 2020
Year : 2020

Month	Water Used			Average Water Usage	Days used For Process Cooling
	(gal)	(cu. ft.)	(acre-feet)	(gpd)	
JANUARY	8,229	1,100	0.025	270	0.0
FEBRUARY	2,992	400	0.009	100	0.0
MARCH	748	100	0.002	20	0.0
APRIL	0	0	0.000	0	0.0
MAY	1,496	200	0.005	50	0.0
JUNE	748	100	0.002	20	0.0
JULY	748	100	0.002	20	0.0
AUGUST	59,100	7,900	0.181	1,910	0.04
SEPTEMBER	5,237	700	0.016	170	0.0
OCTOBER	1,496	200	0.005	50	0.0
NOVEMBER	1,496	200	0.005	50	0.0
DECEMBER	0	0	0.000	0	0.0
Yearly TOTAL	**82,290**	**11,000**	**0.25**		**0.0**
MONTHLY AVERAGE	**7,000**	**917**	**0.021**		

Table 2-20

Malburg Generating Station
Reclaimed Water Usage During 2020

Month	Water Used (gal)	(cu. ft.)	(acre-feet)	Average Water Usage (gpd)
JANUARY	20,242,090	2,705,800	62.12	652,970
FEBRUARY	17,581,098	2,350,100	53.95	627,900
MARCH	18,736,913	2,504,600	57.50	604,420
APRIL	17,293,828	2,311,700	53.07	576,460
MAY	23,479,867	3,138,600	72.05	757,420
JUNE	21,741,282	2,906,200	66.72	724,710
JULY	24,104,530	3,222,100	73.97	777,570
AUGUST	22,793,859	3,046,900	69.95	735,290
SEPTEMBER	25,709,953	3,436,700	78.90	857,000
OCTOBER	23,806,786	3,182,300	73.06	767,960
NOVEMBER	18,364,359	2,454,800	56.35	612,150
DECEMBER	19,291,255	2,578,700	59.20	622,300
Yearly TOTAL	**253,145,820**	**33,838,500**	**776.83**	**693,550**
MONTHLY AVERAGE	**21,095,000**	**2,819,875**	**64.735**	**693,010**

APPENDIX H

NOISE COMPLAINT LOG AND RESOLUTION FORM

CEC Complaint Log

Complaint Log Number	Date Received	Complainant Name	Complainant Contact Info.	Nature of Complaint	Report Submitted to CEC
C1001	6/11/2010	Ken Wilson	323-236-7600 KenWilson@microalarm.com	Startup noise from steam relief vents.	7/2/2010 (Closed)
C1002	6/21/2011	Ken Wilson	323-236-7600 KenWilson@microalarm.com	Startup noise from steam relief vents.	7/27/11 (Closed)
C1003	7/26/2012	Ken Wilson	323-236-7600 KenWilson@microalarm.com	Startup noise from steam relief vents.	8/10/2012 (Closed)

APPENDIX I
NOTICES, COMPLAINTS, AND CITATIONS.

South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 68325

DATE OF VIOLATION		
Month: 7	Day: 1	Year: 2019

Facility Name:	Facility ID#:	Sector:
Bicent (CALIFORNIA) MALBURG LLC	155474	CE

Location Address:	City:	Zip:
4963 S SOTO ST	VERNON	90058

Mailing Address:	City:	Zip:
SAME		

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR		2004(b)(4)		Failure to submit accurate APEP report for CY2019
2	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To:	Phone:	Served By:	Date Notice Served:
Thomas Barnhart	323-476-3626 O 720-545-7251 C	Katherine Lee	12-3-2020

Title:	Email:	Phone No:	Email:
Environmental Specialist	tbarnhart@herotpower.com	☒ 909-396-3525 ☐ 310-233-	klee @aqmd.gov

*Key to Authority Abbreviations:
SCAQMD – South Coast Air Quality Management District
CH&SC – California Health and Safety Code
CCR – California Code of Regulations
CFR – Code of Federal Regulations

Method of Service: ☐ In Person ☒ Certified Mail

ORIGINAL

South Coast Air Quality Management District
21865 COPLEY DR., P.O. Box 4941, DIAMOND BAR, CA 91765-0941

NOTICE TO COMPLY

12/13/2020
DATE OF INSPECTION

Facility Name	Facility ID#	Sector
BICENT (CALIFORNIA) MALBURG LLC	155474	CE
Location Address	**City**	**Zip**
4963 S. SOTO ST	VERNON	90058
Mailing Address	**City**	**Zip**
SAME		

This Notice to Comply is being issued to:

- ☐ Request additional information needed to determine compliance with clean air requirements.
- ☐ Correct a minor violation found during an inspection.

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

#	AQMD RULE/ CAL H&S CODE	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
1	218.1(b)(2)(C)	to perform the annual CO RATA. If the RATA cannot be performed, perform a high level spike test	12-16-2020	
2				
3				
4				
5				
6				

Served To:		Served By:		
Thomas Barnhart		Katherine Lee		
Title:		**Date Served:**	**Phone:**	**Fax:**
Environmental Specialist		12-2-2020	909-396-3525	
Email Address:	**Phone:**	**Email Address:**		**Forms/Applications/Info available at:**
tbarnhart@heroupower.com	720-545-7251	KLEE	@aqmd.gov	www.aqmd.gov

Instructions:

- For each minor violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
- Within 5 working days of achieving compliance for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
- Please copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. Date, sign, and send all completed copies to the attention of the inspector named above.

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL	TITLE	SIGNATURE	DATE

NOTICE#: E 44172

FILE COPY (Blue) *FACILITY COPY (Gold)* *INSPECTOR COPY (White)*

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

March 18, 2020

Douglas Halliday
Chief Operating Officer
Bicent (California) Malburg LLC (Facility ID# 155474)
4963 S Soto Street
Vernon, CA 90058

Dear Mr. Halliday,

In accordance with New Source Review for RECLAIM under Rule 2005(f)(1), Bicent (California) Malburg LLC (Bicent Malburg) is required to provide emission offsets and "hold" sufficient NOx RECLAIM Trading Credits (RTCs) at the beginning of each compliance year in an amount equal to those offsets. This requirement and the specific NOx RTC hold amount for devices D27, D31, D36, D39 and D48 are contained within the company's facility permit. As a Cycle 2 RECLAIM facility, the company's compliance year begins July 1, 2019, and thus, Bicent Malburg is required to hold the requisite NOx RTCs as of that date.

The table below provides:

- The required hold amounts for devices D27, D31, D36, D39, and D48 and their respective associated permit condition number in which the information is contained.
- The total NOx RTCs (81,673 pounds) required to be held by Bicent Malburg at the beginning of the 2019 compliance year.
- The actual NOx RTCs (80,600 pounds) in Bicent Malburg's possession as of July 1, 2019.

Compliance Year 2019

Pollutant	Device ID	Condition Number	Year-to-Year Hold Requirement	RTC Holdings at Start of Compliance Year 2019 (July 1, 2019)*			
			(pounds)	Exp. Dec-19	Exp. Jun-20	Exp. Dec-20	Total
NOx	D27	I 298.1	34,349				
	D31	I 298.2	6,143				
	D36	I 298.3	34,349				
	D39	I 298.4	6,143				
	D48	I 298.5	689				
		Total	81,673	26,866	26,866	26,868	80,600

* Including Non-Tradeable Credits (NTCs) and RTCs in Regional Holding Account (Rule 2002, Table 9)

South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 66127

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	01	2019

Facility Name:	Facility ID#:	Sector:
BICENT (CALIFORNIA) MALBURG LLC	155474	CE

Location Address:	City:	Zip:
4963 S. SOTO STREET	VERNON	90058

Mailing Address:	City:	Zip:
4963 S. SOTO STREET	VERNON	90058

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	2004 (f)(1)		I298.1 I298.2 I298.3 I298.4 I298.5	• FAILURE TO COMPLY WITH ALL RULES AND PERMIT CONDITIONS APPLICABLE TO THE FACILITY AS SPECIFIED IN THE FACILITY PERMIT
2	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	2005 (f)(1)		I298.1 I298.2 I298.3 I298.4 I298.5	• FAILURE TO HOLD ADEQUATE RTCS AT THE COMMENCEMENT OF EACH COMPLIANCE YEAR IN AN AMOUNT EQUAL TO THE AMOUNT OF REQUIRED OFFSETS AS LISTED IN THE PERMIT CONDITIONS.
3	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)		I298.1 I298.2 I298.3	• FAILURE TO OPERATE ALL EQUIPMENT AT A TITLE V FACILITY IN COMPLIANCE WITH ALL TERMS, REQUIREMENTS, AND CONDITIONS SPECIFIED IN THE TITLE V PERMIT.
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR			I298.4 I298.5	
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To:	Phone:	Served By:	Date Notice Served:
DOUGLAS HALLIDAY	310.770.9500	CHRISTEF RALUYOT	03/18/2020

Title:	Email:	Phone No:	Email:
CHIEF OPERATING OFFICER	HALLIDAY@PEGWULF ENERGY.COM	☐ 909-396- ☐ 310-233- 3054	CRALUYOT @ aqmd.gov

*Key to Authority Abbreviations:
SCAQMD – South Coast Air Quality Management District
CH&SC – California Health and Safety Code
CCR – California Code of Regulations
CFR – Code of Federal Regulations

Method of Service: ☐ In Person ☐ Certified Mail

VIOLATOR'S COPY

APPENDIX J
WASTE MANAGEMENT, COV HAZ-6 AND HAZ-7 REPORTS

Non-RCRA Hazardous Waste Solid

In January, World Oil transported 150 lbs. of Rust with Trace Ammonia Salts to US Ecology.

In January World Oil Environmental, Inc transported 10 Gallons of waste paint, 75 lbs of Oily rags/debris and 75 lbs of used filters containing oil.

In January World Oil Environmental, Inc transported 5 lbs of N-aminoethylpiperazine (Epoxy) to Clean Harbors.

In September, World Oil Environmental, Inc. transported 400 lbs. of Used Oily Rags Pacific Resource Recovery.

In November, World Oil Environmental, Inc. transported 400 lbs. of Used Oil Rags and 150 lbs of used filters to Pacific Resource Recovery.

Non-RCRA Hazardous Waste Liquid

No Non-RCRA Hazardous Waste Liquid was disposed of during 2020

Non-RCRA Waste/Used Oil - Recycling Activity

In September, World Oil Environmental Services, Inc, transported 55 gallons of used oil for recycling.

In November, World Oil Environmental Service, Inc, transported approximately 55 gallons of used oil for recycling.

Non-Hazardous Waste Solid – Outage Waste

In January a 25-yard waste bin was used for waste from the repair of the raw water tank.

In May a 40-yard waste bin was used for the fall outage.

In November a 40-yard waste bin was used for the fall outage.

Non-Hazardous Waste Liquid

In January, Mesa Environmental transported approximately 1,270 gallons of Raw Water tank liquid to Crosby and Overton.

In January, World Oil Environmental transported roughly 1,000 gallons of Oily Water from the oil/water separator

In May, World Oil Environmental transported approximately 200 gallons of Oily water to World Oil Recycling.

In August, World Oil Environmental transported approximately 600 gallons of Oily water to World Oil Recycling.

In October, World Oil Environmental transported approximately 110 gallons of Oily water to World Oil Recycling.

In November, Mesa Environmental transported approximately 2,550 gallons of cooling tower liquid to World Oil Recycling for recycling.

Universal Waste

In September World Oil Environmental transported 1 drum of Universal waste – Aerosols to US Ecology.

VERNON PUBLIC UTILITIES
4305 SANTA FE AVENUE, VERNON, CALIFORNIA 90058
TELEPHONE (323) 583-8811

October 5, 2020

Mr. Anwar Ali
Compliance Project Manager
Siting, Transmission & Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512

Subject: **Malburg Generating Station (01-AFC-25C)**
2020 Five-Year Compliance Report (HAZ-6)

Dear Mr. Ali:

Enclosed are five copies of the 2020 Five-Year Compliance Report for the Malburg Generating Station Condition of Certification Number HAZ-6.

Please contact Lisa Umeda at (323) 583-8811 ext. 561 (email address: LUmeda@ci.vernon.ca.us) or Elyse Engel at (702) 354-2648 (email address: Elyse.Engel@jacobs.com) if you have any questions or if you need additional information.

Sincerely,

Abraham Alemu

Abraham Alemu
General Manager of Vernon Public Utilities

cc: Lisa Umeda
Angela Kimmey
Todd Dusenberry
Elyse Engel

FIVE-YEAR COMPLIANCE REPORT
CONDITION OF CERTIFICATION NUMBER
HAZ-6, YEAR 2020

For the:

MALBURG GENERATING STATION
(01-AFC-25C)

Submitted To:

CALIFORNIA ENERGY COMMISSION
1516 Ninth Street, MS-15
Sacramento, CA 95814

Prepared by:

Vernon Public Utilities
4305 Santa Fe Avenue
Vernon, CA 90058

MALBURG GENERATING STATION
FIVE-YEAR COMPLIANCE REPORT
CONDITION OF CERTIFICATION NUMBER HAZ-6
YEAR 2020

INTRODUCTION

Vernon Public Utilities (VPU) has been operating an electric power generating facility (Station "A") since 1933 in the City of Vernon. The facility consists of the Johnson & Heinze Diesel Plant and H. Gonzales Generating Station. VPU constructed Malburg Generating Station (MGS) at the Station "A" facility in 2005 (01-AFC-25). The commissioning of MGS was completed in October 2005 and the power plant was put under commercial operation on October 17, 2005. VPU sold MGS to Bicent (California) Malburg LLC (Bicent) in 2008. After the sale of MGS, VPU continued to retain ownership of the Johnson & Heinze Diesel Plant, H. Gonzales Generating Station, and Station "A" building.

VPU also owns 1,150 feet (950 feet off-site and 200 feet on-site) of 10-inch steel natural gas pipeline serving MGS in conjunction with 7.3 miles of 10-inch steel natural gas pipeline connecting to Southern California Gas Company's (SoCalGas) transmission line 765. The natural gas pipeline section serving MGS (MGS Gas Pipeline) begins at the intersection of Fruitland Avenue and Seville Avenue, and ends at the gas meter at MGS, as shown in the attached map.[1]

Condition of Certification (COC) Number HAZ-6 requires VPU, as the owner of the MGS Gas Pipeline, to ensure that the MGS Gas Pipeline undergoes a design review and detailed inspection every five years after the initial startup. COC Number HAZ-6 also requires that VPU provide an outline of the plan to accomplish a full and comprehensive pipeline design review during construction of the pipeline.

In accordance with the above requirements, VPU is submitting an outline of the plan to accomplish a full and comprehensive pipeline design review. This report also confirms completion of the most recent design review and inspection of the MGS Gas Pipeline, as part of the design review and inspection of VPU's gas transmission system, as required.

BACKGROUND INFORMATION

The MGS Gas Pipeline was designed in accordance with the applicable standards established by the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) and the California Energy Commission (CEC). VPU's natural gas pipeline system undergoes regularly scheduled, detailed inspections in accordance with PHMSA requirements; the MGS Gas Pipeline does as well.

All work on the MGS Gas Pipeline was certified complete on August 10, 2005. This was confirmed by the Chief Building Official (CBO) in a letter dated August 24, 2005. It may be noted that all of the MGS Gas Pipeline plans were checked and approved by the CBO prior to

---

[1] MGS is the black crosshatched box near the middle of the map, labeled 'PP' for Power Plant. The 1,150-foot MGS Gas Pipeline is the green 10-inch high pressure main traversing north from Valve Number W-100 to PP, including the small segment of green 10-inch high pressure main traversing east into the PP area.

the start of installation of the MGS Gas Pipeline. These plans included the welding procedures, piping materials, and other design data.

In accordance with PHMSA requirements, VPU adheres to the following five plans for the safe operation of its natural gas pipeline system, including the MGS Gas Pipeline:

1. Operations, Inspection, and Maintenance Plan
2. Operator Qualification Plan
3. Transmission Integrity Management Plan
4. Gas Emergency Operating Plan
5. Damage Prevention Program

PHMSA representatives periodically inspect VPU's manuals and records, and also conduct field visits to verify compliance with pipeline safety regulations and audit the integrity of VPU's entire natural gas pipeline system.

VPU's natural gas pipelines are also periodically inspected by VPU personnel. Surface conditions on and adjacent to the gas transmission line right-of-way are surveyed monthly for indication of gas leaks, unauthorized construction activity, and other factors that may impact the safe operation of the natural gas pipelines.

OUTLINE OF THE PLAN TO ACCOMPLISH A FULL AND COMPREHENSIVE PIPELINE DESIGN REVIEW

In accordance with PHMSA requirements, VPU performs the following two tasks to accomplish a full and comprehensive design review of its natural gas pipeline system:

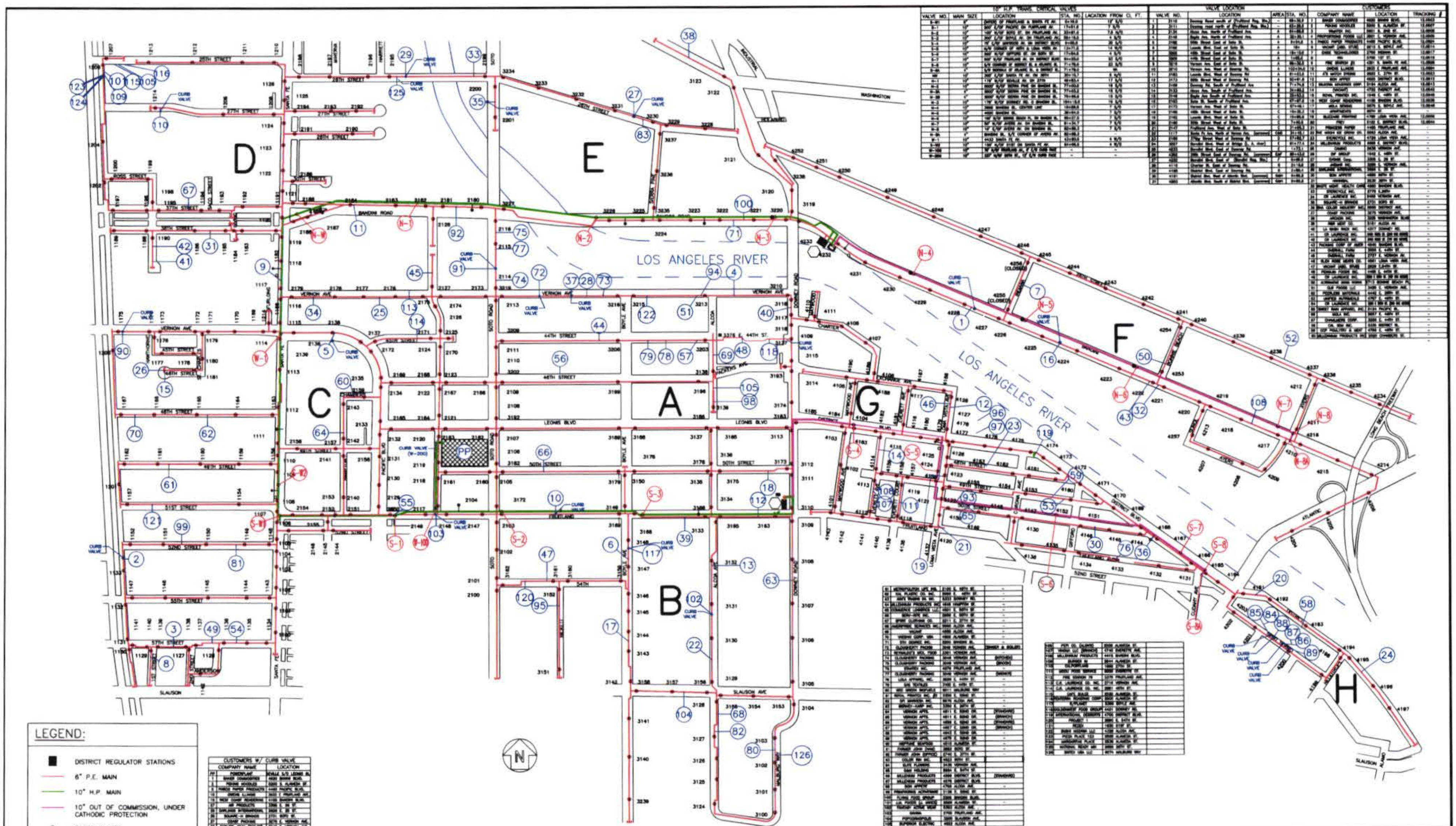
1. VPU reviews the latest regulatory requirements for the design, installation, and operation of natural gas pipelines and identifies any changes from the design criteria followed for design of its natural gas pipeline system at the time the pipeline was initially constructed.
2. If changes in the design criteria are identified, VPU reviews the impacts of these changes on the safe operation of its natural gas pipelines and makes changes to the pipeline design or operation, if appropriate and required.

VERIFICATION FOR CONDITION OF CERTIFICATION HAZ-6

Design Review – The CEC requires VPU to ensure that the MGS Gas Pipeline undergoes a design review every five years. In order to comply with this requirement, all the current regulatory requirements for the design, installation, and operation of natural gas pipelines were reviewed to determine if there were any changes in the regulatory requirements in the last five years. This review indicated that there were no changes in the design requirements applicable to VPU's natural gas pipeline system. Based on this review of the design requirements, it was concluded that VPU's natural gas pipeline system meets all the natural gas pipeline design requirements established by PHMSA.

Inspection of the MGS Gas Pipeline – The CEC requires VPU to ensure that the MGS Gas Pipeline undergoes detailed inspection every five years. VPU conducts routine inspections of its entire gas transmission system and submits summaries of inspection activities annually in accordance with PHMSA requirements. The attached *Annual Report for Calendar Year 2019 Natural or Other Gas Transmission and Gathering Systems* confirms completion of recent inspection activities and satisfies the PHMSA safety inspection and reporting requirements for VPU's gas transmission system, which includes the MGS Gas Pipeline.

VPU Gas System Map



LEGEND:

- ■ DISTRICT REGULATOR STATIONS
- 6" P.E. MAIN
- 10" H.P. MAIN
- 10" OUT OF COMMISSION, UNDER CATHODIC PROTECTION
- BLOCK VALVES
- RECORDER LOCATION
- CUSTOMERS
- 10" H.P. TRANS CRITICAL VALVES
- • CURB VALVES

CUSTOMERS W/ CURB VALVE		
	COMPANY NAME	LOCATION
PP	POWERPLANT	BOYLE S/O LEONIS BL.
1	BAKER COMMODITIES	[illegible] BANDINI BLVD.
[illegible]	[illegible]	[illegible] S. ALAMEDA ST.
[illegible]	[illegible] PAPER PRODUCTS	[illegible] PACIFIC BLVD.
[illegible]	[illegible]	[illegible]
[illegible]	WEST COAST [illegible]	[illegible] BANDINI BLVD.
27	AIR PRODUCTS	[illegible]
[illegible]	[illegible] INTERNATIONAL	[illegible]
[illegible]	SQUARE-H BRANDS	[illegible] SOTO ST.
[illegible]	COAST PACKING	[illegible] E. VERNON AVE.
[illegible]	FARMER JOHN [illegible]	[illegible] E. VERNON AVE.
[illegible]	VERNON APTS.	[illegible]
[illegible]	VERNON APTS.	[illegible]
[illegible]	VERNON APTS.	[illegible]
[illegible]	VERNON APTS.	[illegible]
[illegible]	NEPTUNE SEAFOOD	[illegible] ALAMEDA ST.
[illegible]	FARMER JOHN [illegible]	[illegible] SOTO ST.
[illegible]	[illegible]	[illegible] ALCOA AVE.
[illegible]	[illegible]	[illegible] FRUITLAND AVE.
[illegible]	[illegible]	[illegible] BOYLE AVE.
[illegible]	CALPORTLAND	[illegible] 27TH ST.
[illegible]	[illegible] FOOD GROUP	[illegible] DOWNEY RD.

EN WO#	NO.	REVISION	DATE	APPV'D	CHK	BY
NONE	18	CUST. 122-126, 26TH ST. BRIDGE	9/14/20	DC	FL	JAF
NONE	17	ADDED CUSTOMERS 117-121	11/20/19	DC	FL	JAF
NONE	16	UPDATE(JAEMAR,VALES:4256,4255)	10/22/18	DC	FL	JAF
NONE	15	UPDATE (CUST. 106-115)	7/16/18	DC	FL	JAF
NONE	14	UPDATE (W:100/200), CUST. 105	10/16/17	DC	FL	JAF
NONE	13	ADDED CUSTOMER 103-104	8/28/17	DC	FL	JAF
NONE	12	ADDED CUSTOMERS 95-100	6/14/17	DC	FL	JAF

REFERENCE DRAWING

SCALE: NONE
DATE: 09/28/06
EN WO#: NONE
BY: G. REVELES
CHECKED: D. TAYLOR
APPROVED: D. TAYLOR
ORIGINAL

LIGHT & POWER DEPARTMENT
LOCATION: CITY OF VERNON, CALIFORNIA

GAS SYSTEM MAP
ISOLATION AREAS
CITY OF VERNON, CALIFORNIA

G4A-004-18 ADD

Annual Report for Calendar Year 2019 Natural or Other Gas Transmission and Gathering Systems

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed $100,000 for each violation for each day the violation continues up to a maximum of $1,000,000 as provided in 49 USC 60122.

Form Approved
OMB No. 2137-0522
Expires: 8/31/2020

U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	**ANNUAL REPORT FOR CALENDAR YEAR 2019 NATURAL OR OTHER GAS TRANSMISSION and GATHERING SYSTEMS**	**Initial Date Submitted**	**03/12/2020**
		Report Submission Type	**INITIAL**
		Date Submitted	

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to be approximately 42 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: *Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at http://www.phmsa.dot.gov/pipeline/library/forms.*

PART A - OPERATOR INFORMATION	DOT USE ONLY	**20200978 - 37676**

1. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID)

31955

2. NAME OF OPERATOR:

CITY OF VERNON

3. RESERVED

4. HEADQUARTERS ADDRESS:

4305 SANTA FE AVE.
Street Address

VERNON
City

State: **CA** Zip Code: **90058**

5. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP: *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*

Natural Gas

6. RESERVED

7. FOR THE DESIGNATED "COMMODITY GROUP", THE PIPELINES AND/OR PIPELINE FACILITIES INCLUDED WITHIN THIS OPID ARE: *(Select one or both)*

INTERstate pipeline – List all of the States and OSC portions in which INTERstate pipelines and/or pipeline facilities included under this OPID exist. etc.

INTRAstate pipeline – List all of the States in which INTRAstate pipelines and or pipeline facilities included under this OPID exist. **CALIFORNIA** etc.

8. RESERVED

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For the designated Commodity Group, PARTs B and D will be calculated based on the data entered in Parts L and P respectively. Complete Part C one time for all pipelines and/or pipeline facilities – both INTERstate and INTRAstate - included within this OPID.

PART B – TRANSMISSION PIPELINE HCA MILES	
	Number of HCA Miles
Onshore	7.3
Offshore	0
Total Miles	7.3

PART C - VOLUME TRANSPORTED IN TRANSMISSION PIPELINES (ONLY) IN MILLION SCF PER YEAR (excludesTransmission lines of Gas Distribution systems)	☐ Check this box and do not complete PART C if this report only includes gathering pipelines or transmission lines of gas distribution systems.	
	Onshore	**Offshore**
Natural Gas	5025.7	
Propane Gas		
Synthetic Gas		
Hydrogen Gas		
Landfill Gas		
Other Gas - Name:		

PART D - MILES OF STEEL PIPE BY CORROSION PROTECTION

	Steel Cathodically protected		Steel Cathodically unprotected							
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite[1]	Other	Total Miles
Transmission										
Onshore	0	7.3	0	0	0	0	0	0	0	*7.3*
Offshore	0	0	0	0	0	0	0	0	0	*0*
Subtotal Transmission	*0*	*7.3*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*7.3*
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	*0*
Onshore Type B	0	0	0	0	0	0	0	0	0	*0*
Offshore	0	0	0	0	0	0	0	0	0	*0*
Subtotal Gathering	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Total Miles	*0*	*7.3*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*7.3*

[1]Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

PART E – RESERVED

Form Approved
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For the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAstate pipeline facilities included within this OPID exist. Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than zero.

PARTs F and G

The data reported in these PARTs applies to: *(select only one)*

☐ **Interstate pipelines/pipeline facilities**

☒ **Intrastate pipelines/pipeline facilities in the State of CALIFORNIA** *(complete for each State)*

PART F - INTEGRITY INSPECTIONS CONDUCTED AND ACTIONS TAKEN BASED ON INSPECTION	
1. MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	
a. Corrosion or metal loss tools	3.95
b. Dent or deformation tools	3.95
c. Crack or long seam defect detection tools	3.95
d. Any other internal inspection tools, specify other tools:	
1. Internal Inspection Tools - Other	
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)	*11.85*
2. ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	
a. Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.	0
b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	0
c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:	0
1. "Immediate repair conditions" [192.933(d)(1)]	0
2. "One-year conditions" [192.933(d)(2)]	0
3. "Monitored conditions" [192.933(d)(3)]	0
4. Other "Scheduled conditions" [192.933(c)]	0
3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING	
a. Total mileage inspected by pressure testing in calendar year.	0
b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment.	0
c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT.	0
d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT.	0
4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)	
a. Total mileage inspected by each DA method in calendar year.	3.95
1. ECDA	
2. ICDA	3.95
3. SCCDA	
b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	0
1. ECDA	
2. ICDA	0
3. SCCDA	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	0
1. "Immediate repair conditions" [192.933(d)(1)]	0

2. "One-year conditions" [192.933(d)(2)]	0
3. "Monitored conditions" [192.933(d)(3)]	0
4. Other "Scheduled conditions" [192.933(c)]	0
5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES	
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	0
1.Other Inspection Techniques	
b. Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	0
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	0
1. "Immediate repair conditions" [192.933(d)(1)]	0
2. "One-year conditions" [192.933(d)(2)]	0
3. "Monitored conditions" [192.933(d)(3)]	0
4. Other "Scheduled conditions" [192.933©]	0
6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR	
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a)	*15.8*
b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b)	0
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4)	0
d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA SEGMENT:	0
e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA SEGMENT:	0
PART G– MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Segment miles ONLY)	
a. Baseline assessment miles completed during the calendar year.	0
b. Reassessment miles completed during the calendar year.	3.95
c. Total assessment and reassessment miles completed during the calendar year.	3.95

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For the designated Commodity Group, complete PARTs H, I, J, K, L, M, P Q and R covering INTERstate pipelines and/or pipeline facilities for each State in which INTERstate systems exist within this OPID and again covering INTRAstate pipelines and/or pipeline facilities for each State in which INTRAstate systems exist within this OPID.

PARTs H, I, J, K, L, M, P, Q, and R

The data reported in these PARTs applies to: (*select only one*)

INTRASTATE pipelines/pipeline facilities CALIFORNIA

PART H - MILES OF TRANSMISSION PIPE BY NOMINAL PIPE SIZE (NPS)

Onshore	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	7.3	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
7.3	Total Miles of Onshore Pipe – Transmission								
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Offshore Pipe – Transmission								

PART I - MILES OF GATHERING PIPE BY NOMINAL PIPE SIZE (NPS)

Onshore Type A	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	

	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;
0	Total Miles of Onshore Type A Pipe – Gathering
Onshore Type B	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;
0	Total Miles of Onshore Type B Pipe – Gathering
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;
0	Total Miles of Offshore Pipe – Gathering

PART J – MILES OF PIPE BY DECADE INSTALLED

Decade Pipe Installed	Unknown	Pre-40	1940 - 1949	1950 - 1959	1960 - 1969	1970 - 1979
Transmission						
Onshore	0	0	0	0	0	0
Offshore						
Subtotal Transmission	0	0	0	0	0	0
Gathering						
Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore						
Subtotal Gathering	0	0	0	0	0	0
Total Miles	*0*	*0*	*0*	*0*	*0*	*0*

Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019		Total Miles
Transmission						
Onshore	0	7.1	0.2	0		*7.3*
Offshore						
Subtotal Transmission	0	7.1	0.2	0		*7.3*
Gathering						

Onshore Type A	0	0	0	0		*0*
Onshore Type B	0	0	0	0		*0*
Offshore						
Subtotal Gathering	0	0	0	0		*0*
Total Miles	*0*	*7.1*	*0.2*	*0*		*7.3*

PART K- MILES OF TRANSMISSION PIPE BY SPECIFIED MINIMUM YIELD STRENGTH

ONSHORE	CLASS LOCATION				Total Miles
	Class I	Class 2	Class 3	Class 4	
Steel pipe Less than 20% SMYS	0	0	0	0	0
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	0	0	7.3	0	7.3
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	0	0	0	0	0
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	0	0	0	0	0
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	0	0	0	0	0
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	0	0	0	0	0
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0
Steel pipe Unknown percent of SMYS	0	0	0	0	0
All Non-Steel pipe	0	0	0	0	0
Onshore Totals	0	0	7.3	0	7.3

OFFSHORE	Class I		
Less than or equal to 50% SMYS	0		
Greater than 50% SMYS but less than or equal to 72% SMYS	0		
Steel pipe Greater than 72% SMYS	0		
Steel Pipe Unknown percent of SMYS	0		
All non-steel pipe	0		
Offshore Total	0		*0*
Total Miles	0		*7.3*

PART L - MILES OF PIPE BY CLASS LOCATION

	Class Location				Total Class Location Miles	HCA Miles in the IMP Program
	Class I	Class 2	Class 3	Class 4		
Transmission						
Onshore	0	0	7.3	0	7.3	*7.3*
Offshore	0	0	0	0	0	
Subtotal Transmission	0	0	7.3	0	7.3	
Gathering						

Onshore Type A	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	
Offshore	0	0	0	0	0	
Subtotal Gathering	0	0	0	0	0	
Total Miles	0	0	7.3	0	7.3	7.3

PART M – FAILURES, LEAKS, AND REPAIRS

PART M1 – ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

Cause	Transmission Leaks, and Failures					Gathering Leaks		
	Leaks				Failures in HCA Segments	Onshore Leaks		Offshore Leaks
	Onshore Leaks		Offshore Leaks					
	HCA	Non-HCA	HCA	Non-HCA		Type A	Type B	
External Corrosion	0	0	0	0	0	0	0	0
Internal Corrosion	0	0	0	0	0	0	0	0
Stress Corrosion Cracking	0	0	0	0	0	0	0	0
Manufacturing	0	0	0	0	0	0	0	0
Construction	0	0	0	0	0	0	0	0
Equipment	0	0	0	0	0	0	0	0
Incorrect Operations	0	0	0	0	0	0	0	0
Third Party Damage/Mechanical Damage								
Excavation Damage	0	0	0	0	0	0	0	0
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	0
Weather Related/Other Outside Force								
Natural Force Damage (all)	0	0	0	0	0	0	0	0
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*

PART M2 – KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR

Transmission	0	Gathering	0

PART M3 – LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR

Transmission		Gathering	
Onshore	0	Onshore Type A	0
		Onshore Type B	0
OCS	0	OCS	0
Subtotal Transmission	0	Subtotal Gathering	0
Total	0		

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PART P - MILES OF PIPE BY MATERIAL AND CORROSION PROTECTION STATUS

	Steel Cathodically protected		Steel Cathodically unprotected							
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite[1]	Other[2]	Total Miles
Transmission										
Onshore	0	7.3	0	0	0	0	0	0	0	7.3
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	0	7.3	0	0	0	0	0	0	0	7.3
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	0	0	0	0	0	0	0	0	0
Total Miles	0	7.3	0	0	0	0	0	0	0	7.3

[1]Use of Composite pipe requires PHMSA Special Permit or waiver from a State
[2]specify Other material(s):

Part Q - Gas Transmission Miles by §192.619 MAOP Determination Method

	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other[1] Total	Other Incomplete Records
Class 1 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA)	0		0		0		0		0		0		0	
Class 2 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	0		0		0		0		0		0		0	
Class 3 (in HCA)	7.3	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 3 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	7.3	0	0	0	0	0	0	0	0	0	0	0	0	0

Grand Total	7.3
Sum of Total row for all "Incomplete Records" columns	0

[1]Specify Other method(s):

Class 1 (in HCA)		Class 1 (not in HCA)	
Class 2 (in HCA)		Class 2 (not in HCA)	
Class 3 (in HCA)		Class 3 (not in HCA)	
Class 4 (in HCA)		Class 4 (not in HCA)	

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Part R – Gas Transmission Miles by Pressure Test (PT) Range and Internal Inspection

	PT ≥ 1.25 MAOP		1.25 MAOP > PT ≥ 1.1 MAOP		PT < 1.1 or No PT	
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE
Class 1 in HCA	0	0	0	0	0	0
Class 2 in HCA	0	0	0	0	0	0
Class 3 in HCA	3.95	3.35	0	0	0	0
Class 4 in HCA	0	0	0	0	0	0
in HCA subTotal	*3.95*	*3.35*	*0*	*0*	*0*	*0*
Class 1 not in HCA	0	0	0	0	0	0
Class 2 not in HCA	0	0	0	0	0	0
Class 3 not in HCA	0	0	0	0	0	0
Class 4 not in HCA	0	0	0	0	0	0
not in HCA subTotal	*0*	*0*	*0*	*0*	*0*	*0*
Total	*3.95*	*3.35*	*0*	*0*	*0*	*0*

PT ≥ 1.25 MAOP Total	7.3	Total Miles Internal Inspection ABLE	3.95
1.25 MAOP > PT ≥ 1.1 MAOP Total	0	Total Miles Internal Inspection NOT ABLE	3.35
PT < 1.1 or No PT Total	0	Grand Total	7.3
Grand Total	7.3		

For the designated Commodity Group, complete PART N one time for all of the pipelines and/or pipeline facilities included within this OPID, and then also PART O if any gas transmission pipeline facilities included within this OPID have Part L HCA mile value greater than zero.

PART N - PREPARER SIGNATURE

Angela Kimmey

Preparer's Name(type or print)

(323)583-8811
Telephone Number

Compliance Administrator

Preparer's Title

AKimmey@ci.vernon.ca.us

Preparer's E-mail Address

PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M1)

(323)583-8811
Telephone Number

Todd Dusenberry

Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

Assistant General Manager

Senior Executive Officer's title certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

TDusenberry@ci.vernon.ca.us

Senior Executive Officer's E-mail Address

VERNON PUBLIC UTILITIES
4305 SANTA FE AVENUE, VERNON, CALIFORNIA 90058
TELEPHONE (323) 583-8811

October 5, 2020

Mr. Anwar Ali
Compliance Project Manager
Siting, Transmission & Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512

Subject: **Malburg Generating Station (01-AFC-25C)**
2020 Five-Year Compliance Report (HAZ-7)

Dear Mr. Ali:

Enclosed are five copies of the 2020 Five-Year Compliance Report for the Malburg Generating Station Condition of Certification Number HAZ-7.

Please contact Lisa Umeda at (323) 583-8811 ext. 561 (email address: LUmeda@ci.vernon.ca.us) or Elyse Engel at (702) 354-2648 (email address: Elyse.Engel@jacobs.com) if you have any questions or if you need additional information.

Sincerely,

Abraham Alemu

Abraham Alemu
General Manager of Vernon Public Utilities

cc: Lisa Umeda
Angela Kimmey
Todd Dusenberry
Elyse Engel

FIVE-YEAR COMPLIANCE REPORT
CONDITION OF CERTIFICATION NUMBER
HAZ-7, YEAR 2020

For the:

MALBURG GENERATING STATION
(01-AFC-25C)

Submitted To:

CALIFORNIA ENERGY COMMISSION
1516 Ninth Street, MS-15
Sacramento, CA 95814

Prepared by:

Vernon Public Utilities
4305 Santa Fe Avenue
Vernon, CA 90058

MALBURG GENERATING STATION
FIVE-YEAR COMPLIANCE REPORT
CONDITION OF CERTIFICATION NUMBER HAZ-7
YEAR 2020

INTRODUCTION

Vernon Public Utilities (VPU) has been operating an electric power generating facility (Station "A") since 1933 in the City of Vernon. The facility consists of the Johnson & Heinze Diesel Plant and H. Gonzales Generating Station. VPU constructed Malburg Generating Station (MGS) at the Station "A" facility in 2005 (01-AFC-25). The commissioning of MGS was completed in October 2005 and the power plant was put under commercial operation on October 17, 2005. VPU sold MGS to Bicent (California) Malburg LLC (Bicent) in 2008. After the sale of MGS, VPU continued to retain ownership of the Johnson & Heinze Diesel Plant, H. Gonzales Generating Station, and the Station "A" building.

VPU also owns 1,150 feet (950 feet off-site and 200 feet on-site) of 10-inch steel natural gas pipeline serving MGS in conjunction with 7.3 miles of 10-inch steel natural gas pipeline connecting to Southern California Gas Company's (SoCalGas) transmission line 765. The natural gas pipeline section serving MGS (MGS Gas Pipeline) begins at the intersection of Fruitland Avenue and Seville Avenue, and ends at the gas meter at MGS, as shown in the attached map.[1]

Condition of Certification (COC) Number HAZ-7 requires VPU, as the owner of the MGS Gas Pipeline, to inspect the MGS Gas Pipeline after any significant seismic event in the area which causes surface rupture within one mile of the MGS Gas Pipeline. COC Number HAZ-7 also requires that VPU provide a detailed plan to accomplish a full and comprehensive pipeline inspection in the event of an earthquake. This plan must be reviewed and amended, as appropriate, at least every five years.

In accordance with the above requirements, VPU is submitting this plan to accomplish a full and comprehensive pipeline inspection in the event of an earthquake. It may be noted that there were no significant seismic events in the area during the last five years causing surface rupture within one mile of the MGS Gas Pipeline, or within one mile of any section of VPU's gas transmission system.

BACKGROUND INFORMATION

The MGS Gas Pipeline was designed in accordance with the applicable standards established by the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) and the California Energy Commission (CEC). VPU's natural gas pipeline system is operated and inspected in accordance with PHMSA requirements; the MGS Gas Pipeline is as well.

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[1] MGS is the black crosshatched box near the middle of the map, labeled 'PP' for Power Plant. The 1,150-foot MGS Gas Pipeline is the green 10-inch high pressure main traversing north from Valve Number W-100 to PP, including the small segment of green 10-inch high pressure main traversing east into the PP area.

All work on the MGS Gas Pipeline was certified complete on August 10, 2005. This was confirmed by the Chief Building Official (CBO) in a letter dated August 24, 2005. It may be noted that all the MGS Gas Pipeline plans were checked and approved by the CBO prior to the start of installation of the MGS Gas Pipeline. These plans included the welding procedures, piping materials, and other design data.

In accordance with PHMSA requirements, VPU adheres to the following five plans for the safe operation of its natural gas pipeline system, including the MGS Gas Pipeline:

1. Operations, Inspection, and Maintenance Plan
2. Operator Qualification Plan
3. Transmission Integrity Management Plan
4. Gas Emergency Operating Plan
5. Damage Prevention Program

PHMSA representatives periodically inspect VPU's manuals and records, and also conduct field visits to verify compliance with pipeline safety regulations and audit the integrity of VPU's entire natural gas pipeline system.

VPU's natural gas pipelines are also periodically inspected by VPU personnel. Surface conditions on and adjacent to the gas transmission line right-of-way are surveyed monthly for indication of gas leaks, unauthorized construction activity, and other factors that may impact the safe operation of the natural gas pipelines.

PLAN TO ACCOMPLISH A FULL AND COMPREHENSIVE PIPELINE INSPECTION IN THE EVENT OF AN EARTHQUAKE

To ensure the integrity of its natural gas pipeline system, VPU personnel will conduct a thorough visual inspection of the VPU-owned natural gas transmission line and the MGS Gas Pipeline following each earthquake which can be felt within the City of Vernon.[2] Leak detection equipment will be utilized during these inspections, and special emphasis will be placed on the following items:

- Any smell of natural gas odorant, indicating a gas leak
- Asphalt surface (look for conspicuous cracking near the natural gas pipelines)
- MGS meter pad (ensure that concrete is intact)
- All equipment on MGS meter pad
- Look for any indication of pipe stress on meter pad due to movement

If a hazardous leak is identified during these inspections, VPU personnel will perform the following, additional steps for responding to hazardous, emergency conditions:

Step 1: Initial Rapid Response Inspection The City of Vernon's Fire Department, working in cooperation with Vernon Police and VPU personnel, will immediately respond to any U.S. Department of Transportation classified Class 1 leak(s) representing area(s) of immediate hazard. These leaks may be from the MGS Gas Pipeline or from other VPU-owned natural gas

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[2] It is expected that an earthquake in the Los Angeles area which is capable of causing a surface rupture within one mile of any section of VPU's natural gas pipeline system would be felt within the City of Vernon, thereby triggering the need for a thorough visual inspection.

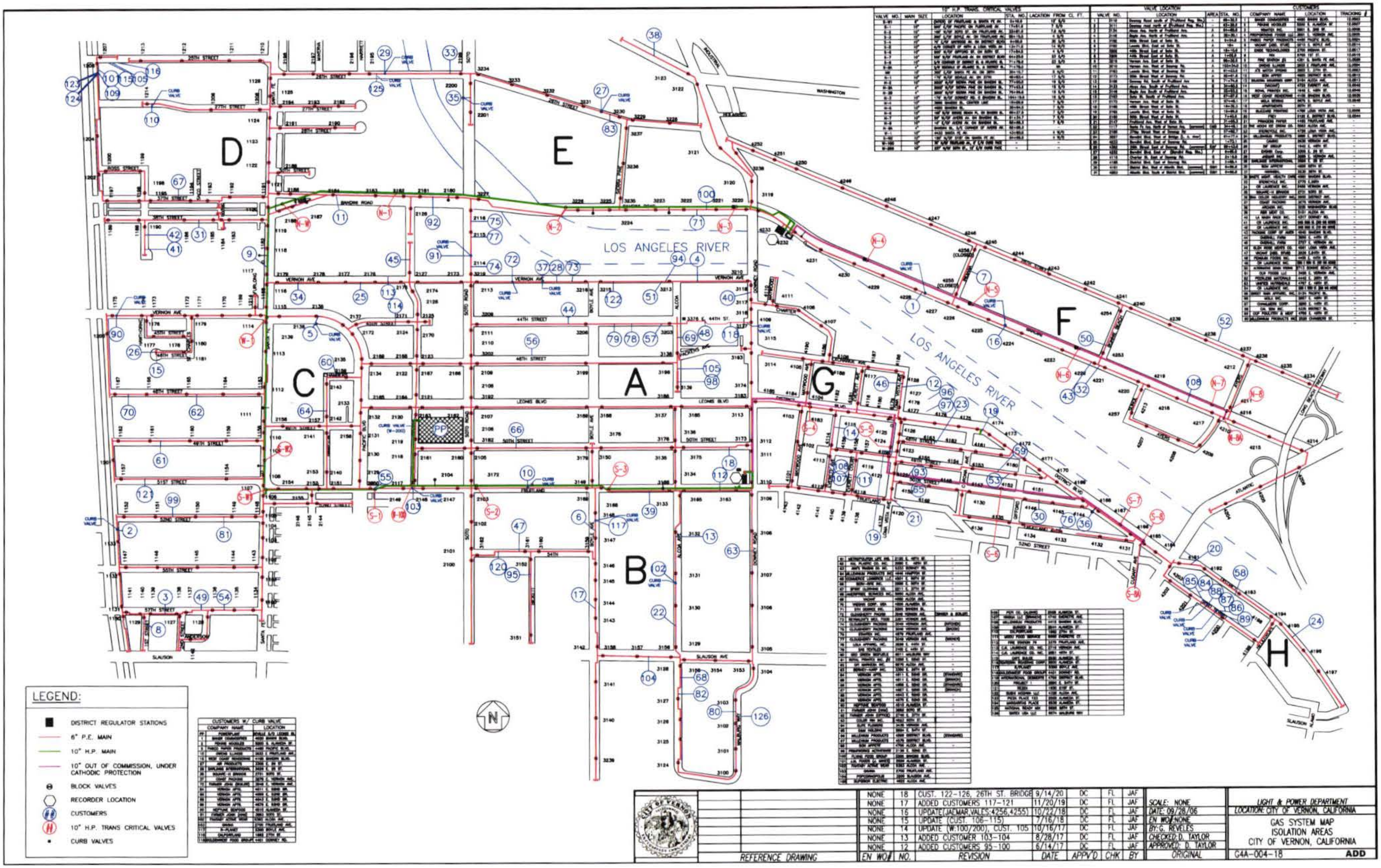
pipeline(s). The City of Vernon's Fire Department will also evacuate the hazard area, if required.

Step 2: Stop Natural Gas Leak after Evacuation After the hazard area has been evacuated, the City of Vernon's Fire Department and VPU may jointly close valves necessary to stop the flow of leaking natural gas. This operation will be conducted following VPU's Natural Gas Emergency Operation Plan. This plan provides the details of isolation zones for both the natural gas distribution system (not serving MGS) and transmission system serving the MGS Gas Pipeline. This plan also provides details regarding the isolation valves for the MGS Gas Pipeline located on Fruitland Avenue. It may be noted that natural gas flow in the MGS Gas Pipeline can be stopped by closing valves at two locations on Seville Avenue, as well as at the MGS Power Plant meter pad.

Step 3: Thorough Inspection of the Natural Gas Pipeline System After completing Steps 1 and 2, described above, a thorough visual inspection will again be conducted of the VPU-owned natural gas transmission line and the MGS Gas Pipeline.

Note: In the event the SoCalGas system fails and the pressure drops to near zero in the system, the interconnection valves at Bandini Boulevard and Fruitland Avenue will be closed. Upon service restoration by SoCalGas, the Vernon system will be resupplied in phases to assure safe operation. The plan will include thorough inspections of each segment as gas pressure is increased.

VPU Gas System Map



EN WO#	NO.	REVISION	DATE	APPV'D	CHK	BY
NONE	18	CUST. 122-126, 26TH ST. BRIDGE	9/14/20	DC	FL	JAF
NONE	17	ADDED CUSTOMERS 117-121	11/20/19	DC	FL	JAF
NONE	16	UPDATE(JAEMAR,VALES:4256,4255)	10/22/18	DC	FL	JAF
NONE	15	UPDATE (CUST. 106-115)	7/16/18	DC	FL	JAF
NONE	14	UPDATE (W:100/200), CUST. 105	10/16/17	DC	FL	JAF
NONE	13	ADDED CUSTOMER 103-104	8/28/17	DC	FL	JAF
NONE	12	ADDED CUSTOMERS 95-100	6/14/17	DC	FL	JAF