

**DOCKETED**

<b>Docket Number:</b>	88-AFC-01C
<b>Project Title:</b>	Compliance - Application for Certification for LUZ Solar Electric Generating Systems Cogeneration Unit VIII
<b>TN #:</b>	236836
<b>Document Title:</b>	88-AFC-1 PWS 2 & 89-AFC-1 PWS 2 - SEGS VIII & IX 2020 CEC Annual Report
<b>Description:</b>	N/A
<b>Filer:</b>	Neal Davies
<b>Organization:</b>	Terra-Gen Operating Company
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	2/18/2021 12:06:25 PM
<b>Docketed Date:</b>	2/18/2021



February 18, 2021

John Heiser  
Compliance Project Manager  
California Energy Commission  
1516 Ninth Street, MS-2000  
Sacramento, CA 95814-5512

**Subject: 88-AFC-1 PWS 2 & 89-AFC-1 PWS 2 SEGS VIII and SEGS IX 2020 Annual Compliance Report**

Dear Mr. Heiser:

Enclosed is the Annual Compliance Report for the SEGS VIII and SEGS IX facilities at Harper Lake. The report includes compliance activities for the period of January 1, 2020 through December 31, 2020, per the revised Annual Reporting Requirements.

If you have any questions, or need additional information, please contact Neal Davies at (760) 762-3100, ext. 225.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Fimbres".

Robert Fimbres  
Site Manager  
LUZ Solar Partners  
VIII & IX

**2020**  
**ANNUAL COMPLIANCE REPORT**  
**SEGS VIII & IX**

**SUBMITTED TO**

CALIFORNIA ENERGY COMMISSION  
SACRAMENTO, CALIFORNIA

**PREPARED BY**

TERRA-GEN OPERATING COMPANY

**FOR**

LUZ SOLAR PARTNERS VIII & IX  
HARPER LAKE, CALIFORNIA

FEBRUARY 18, 2021

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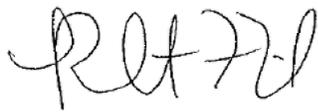
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**Statement of Compliance with Air Quality Terms and Conditions of Certification**

**SEGS VIII & SEGS IX  
Statement of Compliance**

To the best of our knowledge and understanding, SEGS VIII and SEGS IX are in compliance with the Conditions of Certification related to air quality, except for those Conditions identified elsewhere in this report.



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Robert Fimbres  
Site Manager  
LUZ Solar Partners  
SEGS VIII & IX

# 2020 ANNUAL COMPLIANCE REPORT

I. AIR QUALITY

SEGS VIII & IX

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## Mojave Desert Air Quality Management District Correspondence

### 2020 MDAQMD Correspondence Summary

<b>Date</b>	<b>Subject</b>
January	2019 Fourth Quarter Emissions Monitoring Report
February	Operating Permit Fees
February	Title V Permit Fees
April	2020 First Quarter Emissions Monitoring Report
July	2020 Second Quarter Emissions Monitoring Report
August	2020 RATA and Compliance Test Protocol Plan and Report
October	2020 Third Quarter Emissions Monitoring Report

**Mojave Desert Air Quality Management District HTF Heater Permit to Operate**

2020 SEGS VIII & SEGS IX Permit to Operate



**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**

14306 Park Avenue, Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

**PERMIT TO OPERATE**

B002013

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

**EXPIRES LAST DAY OF: MARCH 2021**

**OWNER OR OPERATOR (Co. #603)**

Luz Solar Partners LTD., VIII  
437 Madison Avenue 22nd Floor, Suite A  
New York, NY 10022

**EQUIPMENT LOCATION (Fac. #975)**

Harper Lake SEGS VIII  
43880 Harper Lake Road  
Hinkley, CA 92347

**Description:**

HEATER, SEGS VIII HTF consisting of: A Kinetics Technology Inc. natural gas-fired heater with a maximum design heat input of 872 MMBTU/hr and including the following equipment (motors are added to the rating assuming 2550 Btu per horsepower):

**EQUIPMENT**

Capacity	Equipment Description
872	Heaters, Vertical Tube Box - Four (H-200, H-210, H-220 & H-230) each with 32 Alzeta Pyrocore radiant burners
2.04	Blowers, Forced Draft - Two (B-235 @ 300 hp & 1190 rpm; B-255 @ 500 hp @ 1200 rpm)
2.04	Fans, Induced Draft - Two (B-236 @ 300 hp & 885 rpm; B-256 @ 500 hp & 1190 rpm)
22.9	Pumps, HTF Var Freq - Three (P-300, P-310 & P-300) 3,000 hp each @ 1794 rpm
0.3	Pump, Freeze Protection - One (P-365) 100 hp @ 1775 rpm

**CONDITIONS:**

1. The maximum hourly and daily emission limits (Reference letter from WZI, Inc. dated May 2, 1994, subject "Proposed Emission Limits for SEGS VIII and SEGS IX Heaters") for the following criteria pollutants are:

- NOx - 81.2 lb/h (which is based on a ppmv of 67) but is not exceed 580 lbs in any one day.
- CO - 248 lb/h (which is based on a ppmv of 350) but is not to exceed 550 lbs in any one day.
- PM10 - 5.2 lb/h but not to exceed 83.2 lb in any one day.

Fee Schedule: 2 (f)      Rating: 899280000 Btu      SIC: 4911      SCC: 10100601      Location/UTM(Km): 469E/3876N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Luz Solar Partners LTD., VIII  
43880 Harper Lake Road  
Hinkley, CA 92347

By:   
**Brad Poiriez**  
Air Pollution Control Officer

- a) The average hourly emission for Nox and CO shall be reported per the approved monitoring plan. The average hourly rate shall be the arithmetic average of four or more data points equally spaced over each 1-hour period.
- b) Daily emissions shall be reported based on the hourly emissions reported above.
- c) All PM emissions from these heaters shall be assumed to be 100% PM10.

2. The total annual emissions for Nox and CO when calculated on a rolling annual average shall not exceed the following:

NOx - 27.9 tons/year  
CO - 26.5 tons/year

Compliance with this emission limit shall be determined by using CEMS data and calculating an arithmetic average of the previous 365 days (Day is defined as any 24-hour period beginning at midnight).

3. The daily emissions of NOx and CO and as well as O2 (a diluent gas) shall be monitored using a Continuous Emissions Monitoring System (CEMS) which shall be operating at all times in accordance with the District approval monitoring plan.

4. The following are the acceptability testing requirements for the CEMS:

- a) For NOx CEMS - Performance Specifications 2 of 40 CFR 60 Appendix B.
- b) For O2 CEMS - Performance Specification 3 of 40 CFR 60 Appendix B.
- c) For CO CEMS - Performance Specification 4 of 40 CFR Appendix B.

5. The following compliance tests are required and the emission limit given above shall not be exceeded:

- a) At least once every twelve (12) months: a compliance test for NOx (as NO2 in ppmv at 3% O2 & dry);
- b) At least once every twelve (12) months: a compliance test for CO (in ppmv at 3% O2 & dry);
- c) At least once every sixty (60) months: a compliance test to verify PM10 emissions rate, commencing in 1997. However, PM10 emission compliance testing may be required at the discretion of the District.

The owner/operator must submit a compliance/certification test protocol at least thirty (30) days prior to the compliance/certification test date. The owner/operator must conduct all required compliance/certification tests in accordance with a District-approved test protocol. The owner/operator must notify the District a minimum of ten (10) days prior to the compliance/certification test date so that an observer may be present. The final compliance/certification test results must be submitted to the District within forty-five (45) days of completion of the test. All compliance/certification test notifications, protocols, and results may be submitted electronically to [reporting@mdaqmd.ca.gov](mailto:reporting@mdaqmd.ca.gov)

6. Daily logs shall be maintained which include, but is not limited to, the following:

- a) Hours of operation/day;
- b) Dates of routine maintenance;
- c) Dates of major repairs and/or replacements;
- d) Natural gas use; and,
- e) Amount of HTF added to system.

7. Quarterly reports shall be provided to the District Compliance Supervisor in accordance with the District approved monitoring plan. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.



**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**

14306 Park Avenue, Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

**PERMIT TO OPERATE**

B002016

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

**EXPIRES LAST DAY OF: MARCH 2021**

**OWNER OR OPERATOR (Co. #2427)**

Luz Solar Partners LTD., IX  
437 Madison Avenue, 22nd Floor, Suite A  
New York, NY 10022

**EQUIPMENT LOCATION (Fac. #3819)**

Harper Lake SEGS IX  
43880 Harper Lake Road  
Hinkley, CA 92347

**Description:**

HEATER, SEGS IX HTF consisting of: A Kinetics Technology Inc., natural gas-fired heater with a maximum design heat input of 872 MMBtu/hr and including the following equipment (motors are added to the rating assuming 2550 Btu per horsepower):

**EQUIPMENT**

Capacity	Equipment Description
872	Heaters, Vertical Tube Box - Four (H-200, H-210, H-220 & H230) each with 32 Alzeta Pyrocore radiant burners
1.53	Blowers, Forced Draft - Two (B-235 & B-255) 300 bhp ea. @ 1190 rpm
1.53	Fans, Induced Draft - Two (B-236 & B256) 300 bhp ea. @885 rpm
22.95	Pumps, HTF Var. Freq - Three (P-300, P310 & P-300) 3,000 bhp ea @ 1794 rpm
0.3	Pumps, Freeze Protection - One (P-365) 100 bhp @ 1775 rpm

**CONDITIONS:**

1. The maximum hourly and daily emission limits (Reference letter from WZI, Inc. dated May 2, 1994, subject "Proposed Emission Limits for SEGS VIII and SEGS IX Heaters") for the following criteria pollutants are:

Nox - 81.2 lb/h (which is based on a ppmv of 67) but is not exceed 580 lb in any one day.

CO - 248 lb/h (which is based on a ppmv of 350) but is not to exceed 550 lb in any one day.

PM10 - 5.2 lb/h but not to exceed 83.2 lb in any one day.

Fee Schedule: 2 (f)

Rating: 898310000 Btu

SIC: 4911

SCC: 10100601

Location/UTM(Km):  
469E/3876N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Luz Solar Partners LTD., IX  
43880 Harper Lake Road  
Hinkley, CA 92347

By:   
**Brad Poiriez**  
Air Pollution Control Officer

- a) The average hourly emission for Nox and CO shall be reported per the approved monitoring plan. The average hourly rate shall be the arithmetic average of four or more data points equally spaced over each 1-hour period.
- b) Daily emissions shall be reported based on the hourly emissions reported above.
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2. The total annual emissions for Nox and CO when calculated on a rolling annual average shall not exceed the following:

NOx - 27.9 tons/year  
CO - 26.5 tons/year

Compliance with this emission limit shall be determined by using CEMS data and calculating an arithmetic average of the previous 365 days (Day is defined as any 24-hour period beginning at midnight).

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- b) For O2 CEMS - Performance Specification 3 of 40 CFR 60 Appendix B.
- c) For CO CEMS - Performance Specification 4 of 40 CFR Appendix B.

5. The following compliance tests are required and the emission limit given above shall not be exceeded:

- a) At least once every twelve (12) months: a compliance test for NOx (as NO2 in ppmv at 3% O2 & dry);
- b) At least once every twelve (12) months: a compliance test for CO (in ppmv at 3% O2 & dry);
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6. Daily logs shall be maintained which included, but is not limited to, the following:

- a) Hours of operation/day
- b) Dates of routine maintenance
- c) Dates of major repairs and/or replacements
- d) Natural gas use
- e) Amount of HTF added to system

7. Quarterly reports shall be provided to the District Compliance Supervisor in accordance with the District approved monitoring plan. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

**Dust Suppressant Application Verification**

2020 Dust Suppressant Application

During the month of February 2020, Magnesium Chloride was applied to 15.5 miles of off-site dirt roads for annual PM10 mitigation. SEGS VIII was invoiced for 1.5 miles of road application. SEGS IX was invoiced for 14.0 miles of application.

**SOUTH WESTERN SEALCOATING, INC.**

Contractors Lic. No. #678645  
23644 Adams Avenue  
Murrieta, California 92562

**BILL OF LADING**

12861

(951) 677-6228

• SOLD TO: Terra Gen Luz Solar

• SHIP TO: Hinkley CA.  
Santa Fe

Load Time: \_\_\_\_\_

Load Date: 2/26/2000

CARRIER: SWS

De. Time: 6:00 AM

Del. Date: 2/27/2000

Victorville  
New Ark

ORIGIN NO. Murrieta RELEASE NO. \_\_\_\_\_ CARRIER BL. \_\_\_\_\_

CONTRACT APPLICATION  
OF  
MAGNESIUM CHLORIDE

METER READING U.S. GAL. \_\_\_\_\_

End. \_\_\_\_\_ GAL.

Weight Ticket # \_\_\_\_\_

START \_\_\_\_\_ GAL.

Truck Lic. 1007

GROSS LBS. \_\_\_\_\_

TOTAL \_\_\_\_\_ GAL.

Trailer Lic. 1008

TARE LBS. \_\_\_\_\_

NET LBS. \_\_\_\_\_

Loaded By \_\_\_\_\_

Rec. By \_\_\_\_\_

TOTAL TONS 250

**SOUTH WESTERN SEALCOATING, INC.**

Thank You

**Conditions of Certification – Air Quality Compliance****SEGS VIII & IX  
Conditions of Certification  
Air Quality Compliance**

To the best of our knowledge and understanding as attested to previously in this report, SEGS VIII and SEGS IX are in compliance with the Conditions of Certification relative to air quality with the following exceptions:

**SEGS VIII**

## Condition 1 – 1

Information and records are not available pertaining to the submission of the required copies of bid specifications, installation schedules and purchase orders that were required for the low NOx burner installation at the SEGS III, IV, and V facilities.

**SEGS IX**

## Condition 1 – 3 (b)

Routine source testing has been performed on the modified internal combustion engine and a copy submitted to the Mojave Desert Air Quality Management District.

## Condition 1 – 39

Excess emissions cannot be calculated per 40 CFR 60.7 and 60.13 since heater operation does not satisfy the definition of a “boiler operating day” as contained in 40 CFR 60.41a. NOx emissions are being calculated on a 30-day rolling average.

**Title V Permit**

The Title V Permit was issued by the Mojave Desert Air Quality Management District on October 26, 2016 and is set to expire on October 26, 2021. An application for permit renewal will be submitted in the 2<sup>nd</sup> quarter of 2021.

**Emission Testing – Newberry Springs**

Emission Test Report for Southern California Gas Newberry Springs Compressor Station Compressor Number 7 is available for review at:

**Mojave Desert Air Quality Management**

14306 Park Avenue

Victorville, CA 92392-2310

760-762-1661

## 2020 ANNUAL COMPLIANCE REPORT

### II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

### SEGS VIII & IX

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#### **Waste Contractors List and Agreements**

Luz Solar Partners VIII & IX have entered into contracts with the following listed transporters to provide transportation and disposal services for various hazardous and non-hazardous wastes. Luz Solar Partners VIII & IX does not directly contract with any hazardous waste disposal facilities.

Luz Solar Partners VIII & IX utilizes the San Bernardino County franchise trash collection service for all ordinary trash collection and disposal. As such there is no contract in place for this service and there is no accounting available as to the quantity shipped to the Barstow landfill.

Transportation companies with contracts in 2020:

Burrtec Waste Industries	Non-hazardous wastes
MP Environmental Services	Hazardous wastes
Nursery Products Services	Non-hazardous wastes
Asbury Environmental Services	Hazardous wastes
Desert Environmental Services	Hazardous / Non-hazardous Waste
Clean Harbors	Hazardous wastes

All hazardous waste transporters listed above have active valid EPA identification numbers as well as current valid registration with the California Department of Toxic Substances Control (DTSC). Information regarding these permits is available on the DTSC website.

# 2020 ANNUAL COMPLIANCE REPORT

## II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

## SEGS VIII & IX

### 2020 Non-Hazardous Waste Summary

<u>Waste Type</u>	<u>Quantity (Tons)</u>	<u>Disposal Method and Facility</u>	
Clarifier Sludge Cake	18.16	Recycle	Helendale, CA
Clarifier Sludge Cake	19.16	Recycle	Helendale, CA
Clarifier Sludge Cake	18.83	Recycle	Helendale, CA
Clarifier Sludge Cake	17.87	Recycle	Helendale, CA
Clarifier Sludge Cake	17.85	Recycle	Helendale, CA
Clarifier Sludge Cake	18.74	Recycle	Helendale, CA
Clarifier Sludge Cake	17.74	Recycle	Helendale, CA
Clarifier Sludge Cake	16.92	Recycle	Helendale, CA
Clarifier Sludge Cake	15.21	Recycle	Helendale, CA
Clarifier Sludge Cake	15.19	Recycle	Helendale, CA
Clarifier Sludge Cake	16.27	Recycle	Helendale, CA
Clarifier Sludge Cake	15.89	Recycle	Helendale, CA
Clarifier Sludge Cake	12.32	Recycle	Helendale, CA
Clarifier Sludge Cake	21.93	Recycle	Helendale, CA
Clarifier Sludge Cake	24.96	Recycle	Helendale, CA
Clarifier Sludge Cake	19.8	Recycle	Helendale, CA
Clarifier Sludge Cake	20.89	Recycle	Helendale, CA
Clarifier Sludge Cake	10.03	Recycle	Helendale, CA
Clarifier Sludge Cake	12.03	Recycle	Helendale, CA
Clarifier Sludge Cake	12.65	Recycle	Helendale, CA
Clarifier Sludge Cake	11.08	Recycle	Helendale, CA
Clarifier Sludge Cake	11.86	Recycle	Helendale, CA
Clarifier Sludge Cake	11.3	Recycle	Helendale, CA
Clarifier Sludge Cake	15.59	Recycle	Helendale, CA
Clarifier Sludge Cake	14.23	Recycle	Helendale, CA
Clarifier Sludge Cake	12.08	Recycle	Helendale, CA
Clarifier Sludge Cake	25.68	Recycle	Helendale, CA
Clarifier Sludge Cake	24.33	Recycle	Helendale, CA
Clarifier Sludge Cake	26.27	Recycle	Helendale, CA
Clarifier Sludge Cake	6.54	Recycle	Helendale, CA
Clarifier Sludge Cake	6.67	Recycle	Helendale, CA
Clarifier Sludge Cake	11.79	Recycle	Helendale, CA
Clarifier Sludge Cake	11.21	Recycle	Helendale, CA
Clarifier Sludge Cake	15.83	Recycle	Helendale, CA
Clarifier Sludge Cake	13.73	Recycle	Helendale, CA
Clarifier Sludge Cake	13.82	Recycle	Helendale, CA
Clarifier Sludge Cake	14.51	Recycle	Helendale, CA

## 2020 ANNUAL COMPLIANCE REPORT

### II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

### SEGS VIII & IX

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#### 2020 Non-Hazardous Waste Summary (continued)

Clarifier Sludge Cake	10.79	Recycle	Helendale, CA
Clarifier Sludge Cake	10.6	Recycle	Helendale, CA
Clarifier Sludge Cake	12.22	Recycle	Helendale, CA
Clarifier Sludge Cake	7.99	Recycle	Helendale, CA
Clarifier Sludge Cake	7.28	Recycle	Helendale, CA
Clarifier Sludge Cake	13.41	Recycle	Helendale, CA
Clarifier Sludge Cake	7.24	Recycle	Helendale, CA
Clarifier Sludge Cake	8.86	Recycle	Helendale, CA
Clarifier Sludge Cake	8.55	Recycle	Helendale, CA
Clarifier Sludge Cake	8.68	Recycle	Helendale, CA
Clarifier Sludge Cake	6.36	Recycle	Helendale, CA
Clarifier Sludge Cake	12.29	Recycle	Helendale, CA
Clarifier Sludge Cake	5.78	Recycle	Helendale, CA
Clarifier Sludge Cake	12.52	Recycle	Helendale, CA
Clarifier Sludge Cake	11.43	Recycle	Helendale, CA
Clarifier Sludge Cake	11.16	Recycle	Helendale, CA
Clarifier Sludge Cake	11.77	Recycle	Helendale, CA
Clarifier Sludge Cake	11.68	Recycle	Helendale, CA
Clarifier Sludge Cake	10.72	Recycle	Helendale, CA
Clarifier Sludge Cake	11.15	Recycle	Helendale, CA
Clarifier Sludge Cake	11.11	Recycle	Helendale, CA
Clarifier Sludge Cake	9.43	Recycle	Helendale, CA
Clarifier Sludge Cake	11.92	Recycle	Helendale, CA
Clarifier Sludge Cake	10.59	Recycle	Helendale, CA
Clarifier Sludge Cake	10.7	Recycle	Helendale, CA
Clarifier Sludge Cake	12.35	Recycle	Helendale, CA
Clarifier Sludge Cake	7.19	Recycle	Helendale, CA
Clarifier Sludge Cake	7.06	Recycle	Helendale, CA
Clarifier Sludge Cake	7.23	Recycle	Helendale, CA
Clarifier Sludge Cake	8.25	Recycle	Helendale, CA
Clarifier Sludge Cake	7.4	Recycle	Helendale, CA
Clarifier Sludge Cake	8.38	Recycle	Helendale, CA
Clarifier Sludge Cake	10.01	Recycle	Helendale, CA
Clarifier Sludge Cake	9.22	Recycle	Helendale, CA
Clarifier Sludge Cake	8.2	Recycle	Helendale, CA
Clarifier Sludge Cake	7.32	Recycle	Helendale, CA
Clarifier Sludge Cake	9.84	Recycle	Helendale, CA
Clarifier Sludge Cake	8.98	Recycle	Helendale, CA
Clarifier Sludge Cake	9.5	Recycle	Helendale, CA
Clarifier Sludge Cake	8.5	Recycle	Helendale, CA

## 2020 ANNUAL COMPLIANCE REPORT

### II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

---

#### 2020 Hazardous Waste Summary

<u>Waste Type</u>	<u>Quantity (Tons)</u>	<u>Disposal Method</u>	<u>Facility</u>
Cooling Tower Waste Liquid	12.63	Landfill	Wellton, AZ
Oil Contaminated Debris	0.81	Landfill	Buttonwillow, CA
Mirror Glass Contaminated With Lead	10.69	Landfill	Beatty, NV
Oily Water with HTF	17.387	Recycle	Compton, CA
Oil Contaminated Debris	0.72	Landfill	Buttonwillow, CA
Mirror Glass Contaminated With Lead	9.95	Landfill	Beatty, NV
Used Oil	0.05	Recycle	Fontana, CA
Oily Water with HTF	17.647	Recycle	Compton, CA
Oil Contaminated Debris	0.09	Landfill	Buttonwillow, CA

## 2020 ANNUAL COMPLIANCE REPORT

### **Hazardous Waste Storage**

Under Conditions of Certification WASTE-4 (VIII) and WASTE-5 (IX) Luz Solar Partners VIII & IX shall not store hazardous waste on site for more than 90 days unless they obtain an extension from California Department of Health Services (CDHS) or a permit as a storage facility. Jurisdiction over hazardous waste management no longer resides with the CDHS. The California Department of Toxic Substances Control (DTSC) is the state agency that now has jurisdiction in these matters and the agency empowered with the enforcement of the regulations is the San Bernardino County Fire Department, Hazardous Materials Division acting as the CUPA for San Bernardino County. Luz Solar Partners VIII & IX follows all applicable regulations regarding the storage of hazardous materials on site. No hazardous materials are stored on site for longer than 90 days unless allowed by LORS and Luz Solar Partners VIII & IX did not apply for a variance to hazardous waste regulations or applied for a permit as a storage facility during the 2020 calendar year.

2020 ANNUAL COMPLIANCE REPORT

II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

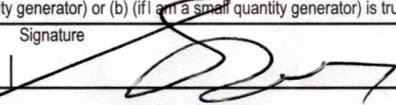
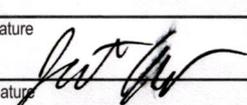
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**2020 Heat Transfer Fluid Waste Manifests**

Lin# PA 15282

Please print or type.

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CAR000215715	2. Page 1 of 1	3. Emergency Response Phone 800 458-3036	4. Manifest Tracking Number <b>019379819 JJK</b>		
5. Generator's Name and Mailing Address LUZ SOLAR PARTNERS 43880 HARPER LAKE HINKLEY CA 92347				Generator's Site Address (if different than mailing address)			
Generator's Phone: 760 762 3100							
6. Transporter 1 Company Name MP Environmental Services				U.S. EPA ID Number CAT000624247			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address CLEAN HARBORS BUTTONWILLOW 2500 WEST LOKERN RD BUTTONWILLOW CA 93208				U.S. EPA ID Number			
Facility's Phone: 881 762-6200				CAD980675276			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON RCRA HAZARDOUS WASTE SOLID (OIL, DEBRIS WITH THERMINOL)	001	CM	20	Y	352	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information 1) PROFILE # CH1785505B, DEBRIS, SOIL CONTAMINATED WITH THERMINOL  SO# 2003935712							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offero's Printed/Typed Name <b>GEORGE RAMOS</b>				Signature 		Month Day Year <b>7 31 2020</b>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <b>Justin Mageo</b>				Signature 		Month Day Year <b>7 31 20</b>	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. <b>H132</b>		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name <b>Edwado Tades</b>				Signature 		Month Day Year <b>7 31 20</b>	

TRK# 780-PA04645  
 TRK# 3920-LFK4027

Please print or type.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number C A R 0 0 0 2 1 5 7 1 5	2. Page 1 of 1	3. Emergency Response Phone 800 458-3036	4. Manifest Tracking Number <b>019390483 JJK</b>		
5. Generator's Name and Mailing Address LUZ SOLAR PARTNERS 43880 HARPER LAKE HINKLEY CA 92347				Generator's Site Address (if different than mailing address)			
Generator's Phone: 7 6 0 7 6 2 . 3 1 0 0							
6. Transporter 1 Company Name MP Environmental Services				U.S. EPA ID Number C A T 0 0 0 6 2 4 2 4 7			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address CLEAN HARBORS BUTTONWILLOW 2500 WEST LOKERN RD BUTTONWILLOW CA 93208				U.S. EPA ID Number			
Facility's Phone: 881 762-6200				C A D 9 8 0 6 7 5 2 7 6			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON RCRA HAZARDOUS WASTE SOLID (OIL, DEBRIS WITH THERMINOL)	0 0 1	CM	15	Y	352	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information 1) PROFILE # CH1785505B, DEBRIS, SOIL CONTAMINATED WITH THERMINOL <i>SO# 2001126877 BFN#WB1</i>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name <i>Neal Davies</i>				Signature <i>Neal Davies</i>		Month Day Year <i>02   28   20</i>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.      Port of entry/exit: _____ Transporter signature (for exports only): _____      Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <i>Greg Moore</i>				Signature <i>Greg Moore</i>		Month Day Year <i>02   28   20</i>	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. <i>H132</i>		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name <i>Edwards Trade</i>				Signature <i>ET</i>		Month Day Year <i>2   28   20</i>	

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CA R000215715	2. Page 1 of 1	3. Emergency Response Phone (800) 424-9300	4. Manifest Tracking Number <b>021696897 JJK</b>		
5. Generator's Name and Mailing Address <b>LUZ SOLAR PARTNERS VIII AND IX - HARPER LAKE R. 43880 HARPER LAKE RD. HINKLEY CA 92347</b>			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name <b>WORLD OIL ENVIRONMENTAL SERVICES</b>			U.S. EPA ID Number CAD028277036				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>WORLD OIL RECYCLING 2000 N. ALAMEDA STREET COMPTON CA 90222</b>			U.S. EPA ID Number CAT080013352				
Facility's Phone: (310)537-7100							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. <b>NON-RCRA HAZARDOUS WASTE, LIQUID (OILY WATER)</b>	001	TT	4800	G	222	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information <b>EMERGENCY CONTACT : CHEMTREC 1-800-424-9300 WOES TERMINAL FONTANA **APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT*</b>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40.CFR.262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name <b>X Manuel Sanchez</b>			Signature <i>Manuel Sanchez</i>		Month Day Year <b>10 28 20</b>		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <b>ISMAEL TRUJILLO</b>			Signature <i>Ismael Trujillo</i>		Month Day Year <b>10 28 20</b>		
Transporter 2 Printed/Typed Name			Signature		Month Day Year		
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: _____							
18b. Alternate Facility (or Generator)					U.S. EPA ID Number		
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)					Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.	2.	3.	4.				
1.	<b>H039</b>						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name <b>Cristian Quintanilla</b>			Signature <i>Cristian Quintanilla</i>		Month Day Year <b>10 28 20</b>		

Please print or type.

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CAR000215715	2. Page 1 of 1	3. Emergency Response Phone (800) 424-9300	4. Manifest Tracking Number 021710215 JJK		
5. Generator's Name and Mailing Address LUZ SOLAR PARTNERS VIII AND IX - HARPER LAKE R 43880 HARPER LAKE RD. HINKLEY CA 92347 Generator's Phone: 760 762-3100				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name WORLD OIL ENVIRONMENTAL SERVICES				U.S. EPA ID Number CAD028277036			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address WORLD OIL RECYCLING 2000 N. ALAMEDA STREET COMPTON CA 90222 Facility's Phone: (310) 537-7100				U.S. EPA ID Number CAT080013352			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON-RCRA HAZARDOUS WASTE, LIQUID (OILY WATER)	001	TT	4200	G	222	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information EMERGENCY CONTACT: CHEMTREC 1-800-424-9300 WOES TERMINAL: FONTANA **APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT*							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name X Ivan Cunningham				Signature X [Signature]		Month Day Year X 6   16   20	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name RAUL ORTEGA				Signature Raul Ortega		Month Day Year 06   16   20	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H039		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18							
Printed/Typed Name SOPHAL P. SVAY				Signature [Signature]		Month Day Year 06   17   20	

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CAR000215715</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>800 458-3036</b>	4. Manifest Tracking Number <b>021782011 JJK</b>	
5. Generator's Name and Mailing Address <b>LUZ SOLAR PARTNERS 43880 HARPER LAKE HINKLEY CA 92347</b>				Generator's Site Address (if different than mailing address)		
Generator's Phone: <b>760 762 3100</b>				U.S. EPA ID Number <b>CAT000624247</b>		
6. Transporter 1 Company Name <b>MP Environmental Services</b>				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address <b>CLEAN HARBORS BUTTONWILLOW 2500 WEST LOKERN RD BUTTONWILLOW CA 93206</b>				U.S. EPA ID Number <b>CAD980675276</b>		
Facility's Phone: <b>861 762-8200</b>						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
	1. <b>NON RCRA HAZARDOUS WASTE SOLID (OIL, DEBRIS WITH THERMINOL)</b>	<b>001</b>	<b>CM</b>	<b>12</b>	<b>Y</b>	<b>352</b>
	2.					
	3.					
	4.					
14. Special Handling Instructions and Additional Information <b>1) PROFILE # CH1785505B, DEBRIS, SOIL CONTAMINATED WITH THERMINOL</b>  <b>50# 2005716581 Bin # WB 1</b>						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offoror's Printed/Typed Name <b>Ben Wilson</b>				Signature <b>Ben Wilson</b>		Month Day Year <b>11 09 2020</b>
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name <b>STEVE JONES</b>				Signature <b>Steve Jones</b>		Month Day Year <b>11 09 20</b>
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
18b. Alternate Facility (or Generator)				Manifest Reference Number: _____ U.S. EPA ID Number _____		
Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator)						Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. <b>H132</b>		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name <b>George Toure</b>				Signature <b>[Signature]</b>		Month Day Year <b>11 19 20</b>

## 2020 ANNUAL COMPLIANCE REPORT

II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

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### **Heat Transfer Fluid Shipments**

There were no HTF shipments to the SEGS VIII and IX facilities in 2020.

2020 ANNUAL COMPLIANCE REPORT

II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

---

**BLM Habitat Well Water Usage**

**Annual Verification Report Form  
 and  
 Invoice for Administrative & Biological Assessments  
 4th Quarter (July 1 - September 30)  
 2019-20 Water Year**

Account Number: HAR004P	Subarea: Centro	Free Production Allowance (FPA):	1,075 Ac-ft
Harper Lake Company VIII		Prior Year Carryover:	1,147 Ac-ft
43880 Harper Lake Road		FPA Transfers In:	0 Ac-ft
Hinkley, CA 92347		FPA Transfers Out:	0 Ac-ft
		Carryover Transfers In:	0 Ac-ft
		Carryover Transfers Out:	0 Ac-ft
		<b>Total Adjusted FPA:</b>	<b>2,222 Ac-ft</b>

State Well Number	Local Well Designation	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter Production	Current Well Status*	Estimated Annual Production
11N04W19E01	WELL #34	0.00	.08	0.00	2.26	A	2.34
11N04W19E02	WELL #35	86.29	78.53	188.90	205.93	A	559.65
11N04W19J01	WELL #40	7.14	10.54	133.38	166.17	A	317.23
11N04W19Q02	WELL #36	1.45	3.04	2.90	1.79	A	9.18
11N04W28R01	BLM Habitat Well	0.00	0.00	0.00	0	T	0
11N04W28R02	BLM Habitat Well #02	17.66	16.54	26.31	26.01	A	86.52
11N05W24L01	WELL #37	0.00	0.00	0.00	0	I	0
11N05W24P02	WELL #38	0.00	0.00	0.00	0	I	0
11N05W24Q02	WELL "D"	0.00	0.00	0.00	0	I	0
<b>Totals:</b>		112.54	108.73	351.49	402.16	Ac-Ft	974.92

\* A=Active  
 I=Inactive  
 S=Sold  
 D=Destroyed  
 L=Leased  
 B=Abandoned  
 U=Unknown  
 M=Monitoring  
 T=Standby

Administrative Assessment @ \$ 3.55 per Ac-Ft (Production x \$ 3.55) \$ 1,427.67  
 Biological Assessment @ \$ 0.95 per Ac-Ft (Production x \$ 0.95) \$ 382.05  
**Total Amount Due \$ 1,809.72**

Please indicate in the space below, the contact person you wish to receive all Watermaster mailings and their address.

Neal Davies  
 Contact  
760-762-3100 x225  
 Phone

43880 Harper Lake Rd.  
 Mailing Address  
Hinkley CA 92347  
 City State Zip Code

I declare under penalty of perjury that the foregoing information is true and correct:

Neal Davies  
 Individual  
10-5-2020  
 Date

Terra-Gen Operating Company  
 Company  
Neal Davies  
 Company Agent  
10-5-2020  
 Date

Payment is due and payable October 31, 2020.

Please attach a check to the top copy and return in the enclosed envelope with proper postage.

A charge of 1.25% per month or portion thereof will be assessed to any account past due.

If not received by October 31, 2020 your assessments will be calculated as if 25% of your Base Annual Production was produced.

Please make any corrections and/or additions on this page and attach supporting documentation.

2020 ANNUAL COMPLIANCE REPORT

II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

---

**2020 BRMIP Statement of Compliance**



CARLSBAD  
FRESNO  
IRVINE  
LOS ANGELES  
PALM SPRINGS  
POINT RICHMOND  
RIVERSIDE  
ROSEVILLE  
SAN LUIS OBISPO

January 29, 2021

Neal Davies  
Terra-Gen Operating Company  
43880 Harper Lake Road  
Hinkley, CA 92347

Subject: Biological Resources Mitigation Implementation Plan (BRMIP) Compliance

Dear Mr. Davies:

The Solar Energy Generating Systems (SEGS) VIII and IX facilities conducted all activities from January 1, 2020, to December 31, 2020, in compliance with the approved Biological Resources Mitigation Implementation Plan (BRMIP) and the portions of the California Energy Commission decision pertinent to biological resources.

Sincerely,

**LSA Associates, Inc.**

Richard A. Erickson  
Designated Biologist

**CONDITIONS OF CERTIFICATION**

**SEGS VIII and IX**

Condition 4

LUZ Solar Partners VIII and IX received no complaints from property owners or the public regarding problems due to induced voltages on vehicles, portable objects, metallic roofs, metallic building sidings, gutters, fences, irrigation equipment or other objects within the right-of-way for the calendar year 2020.

Condition 5

LUZ Solar Partners VIII and IX received no complaints of radio and television interference attributed to the transmission line facilities for the calendar year 2020.

Condition 6

LUZ Solar Partners VIII and IX maintained each transmission line pole site free of waste material and rubbish for the calendar year 2020.

**Transmission Line Inspection**

2020 Inspection

The transmission line between the Harper Lake facilities and Kramer Junction was inspected in April 2020. The transmission line poles were free of waste material and rubbish.

# 2020 ANNUAL COMPLIANCE REPORT

IV. DIESEL FUEL DATA

SEGS VIII & IX

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## **Diesel Fuel Data**

2020 Diesel Fuel Purchases provided under separate cover.

# 2020 ANNUAL COMPLIANCE REPORT

V. QUALIFYING FACILITY STATUS

SEGS VIII & IX

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## 2020 Facility Status

### SEGS VIII

**Power Output**

125,616 Gross MWh

**Primary Energy**

1,430,526 mmbtu

**Natural Gas Use**

5,688 mmbtu

### SEGS IX

**Power Output**

160,886 Gross MWh

**Primary Energy**

1,824,504 mmbtu

**Natural Gas Use**

315,764 mmbtu

## 2020 ANNUAL COMPLIANCE REPORT

V. QUALIFYING FACILITY STATUS

SEGS VIII & IX

### Power Plant Reliability

#### SEGS VIII - 2020 Production Data

	Net Electrical Production  (MWh)	Monthly Capacity Factors			Plant Availability
		On- Peak	Mid- Peak	Off- Peak	
Jan	584		44.5%	6.0%	100%
Feb	6,344	0.0%	21.9%	5.6%	100%
Mar	6,878		21.9%	5.1%	98%
Apr	11,521		35.7%	9.6%	100%
May	17,054		55.1%	14.9%	99%
Jun	13,415	53.5%	27.7%	10.8%	92%
Jul	21,549	81.0%	41.5%	17.8%	100%
Aug	15,468	62.5%	26.6%	14.9%	100%
Sep	8,681	38.6%	14.1%	8.2%	100%
Oct	7,652	0.0%	23.7%	6.1%	100%
Nov	3,733		13.3%	2.9%	100%
Dec	2,020		6.3%	1.6%	100%
Year	114,899				99%

#### SEGS IX - 2020 Production Data

	Net Electrical Production  (MWh)	Monthly Capacity Factors			Plant Availability
		On- Peak	Mid- Peak	Off- Peak	
Jan	564		42.1%	6.2%	100%
Feb	5,884	0.0%	20.7%	5.0%	72%
Mar	7,534		23.9%	5.6%	98%
Apr	12,093		37.4%	10.2%	100%
May	19,331		60.8%	17.2%	100%
Jun	22,108	98.1%	40.3%	17.1%	100%
Jul	24,771	100.7%	45.6%	19.0%	100%
Aug	21,886	100.4%	38.3%	17.3%	100%
Sep	16,423	91.5%	20.6%	12.5%	99%
Oct	8,293	0.0%	26.2%	6.3%	100%
Nov	4,166		14.6%	3.4%	100%
Dec	2,420		7.6%	1.9%	100%
Year	145,474				97%

2020 ANNUAL COMPLIANCE REPORT  
SEGS VIII & IX

VI. CONDITIONS OF CERTIFICATION

**Compliance Matrix**

<b>COMPLIANCE REQUIREMENTS FOR SEGS VIII &amp; SEGS IX</b>				
				<b>Date: February 07, 2016</b>
<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
<b>AIR QUALITY</b>				
AQ 1-1 IX AQ 1-1 VIII	Restrict heater NO <sub>x</sub> emissions <328.5 lb/day Low NO <sub>x</sub> burners		Effective 6/1/92  Install low NO <sub>x</sub> burners	Deleted May 10, 2001  Complete
AQ 1-2 IX AQ 1-2 VIII	NO <sub>x</sub> emission controls to Southern Cal Gas engines NO <sub>x</sub> emissions	CEC CPM	Must be modified by 6/1/91  Monitor NO <sub>x</sub> emissions at III, IV & VIII. Submit Quarterly Compliance Reports.	Complete  Deleted May 10, 2001
AQ 1-3b IX	Tests of modified engines	MDAQMD CPM	Source tests for modified engines	Ongoing Currently under review
AQ 1-3, AQ1-4 VIII AQ 1-4b IX	PM10 control	CEC CPM	Provide PM10 control plan & mitigation Treat roads with magnesium chloride as needed for fugitive dust control	Complete  MgCl applied to Hoffman, Lockhart & Santa Fe Roads
AQ 1-5	Revised PM10 emission limit		Revise PM10 limits after workshop	Complete

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<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
AQ1-6	PM10 control		Treat roads with magnesium chloride	See AQ 1-4
AQ 1-7	Source test protocol for cooling tower		Submit protocol for measuring PM101	Complete
AQ 1-8	Test requirements for cooling tower		Comply with requirements in cooling tower source tests	Complete
AQ 1-10	Collect SEGS VIII data, NO <sub>x</sub> >300 lb/day data collection		Report occasions when NO <sub>x</sub> >300 lb/day from 3/1/90 to 12/31/92	Complete
AQ 1-11 VIII & IX	Applicable district rules	CEC	Comply with all applicable rules of SBCAPCD Annual report	Ongoing Ongoing
AQ 1-12 VIII & IX	Other applicable rules	CEC	Compliance with applicable federal and State rules Quarterly report	Ongoing Ongoing
AQ 1-13 VIII & IX	Permit conditions	MDAQMD CEC	Any changes to MDAQMD required emission controls subject to review	Ongoing, as required
AQ 1-14 VIII & IX	BACT requirement	MDAQMD	Specifies emission limits	Ongoing
AQ 1-15 VIII & IX	Design changes	MDAQMD CEC	Modification to heaters requires MDAQMD approval	Ongoing, as required

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				Date: February 07, 2016
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS
AQ 1-19 VIII & IX	Malfunction / Breakdown Provisions	MDAQMD	Promptly notify MDAQMD of any violations	Ongoing
AQ 1-20 VIII & IX	Right to Entry	MDAQMD CARB, EPA, CEC	Permit authorized personnel to enter for inspection. Have records available for inspection.	Ongoing
AQ 1-21 VIII & IX	Transfer of Ownership	MDAQMD CEC	Notify by letter succeeding owners & operators that the Commission Decision\Permit to Operate is binding on all subsequent owners & operators	Ongoing, as required
AQ 1-23	Emission limits during installation and testing		Use best heater operation Approval for heater test >16 hours Verify 25 ppm by source test If NO <sub>x</sub> emissions above lbs/day limit 1. Submit plan for approval 2. Implement changes	Complete  PTO modified
AQ 1-24 VIII & IX	Operational phase	MDAQMD	Restrict heater consumption to no more than 9.5x10 <sup>6</sup> therms Operate cooling tower <4,000 hrs/yr Perform heater compliance testing annually Submit gas use data & circ water pump daily hrs of operation in quarterly report Submit results of Heaters Compliance Testing in Annual Compliance Report	Deleted May 10, 2001  Ongoing Ongoing  Ongoing

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<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
			along with daily Heaters Nat Gas consumption and Cooling Tower Fans' daily hrs of operation.	
AQ 1-25	Fuel use		Use only commercial grade natural gas as fuel	Ongoing
AQ 1-26 VIII & IX	Opacity limits	MDAQMD	Monitor visible emissions	Ongoing
AQ 1-27	CEMS		Submit CEMS plan for approval Order and install CEMS Certification test; cylinder gas audit and RATA tests Test report	Complete Complete Ongoing  Ongoing
AQ 1-28 VIII & IX	Compliance test	MDAQMD CEC	Submit revised plan for approval Conduct test Test particulates every fifth year	Ongoing
AQ 1-29 VIII & IX	Monitoring plan\ Reporting requirements	MDAQMD CEC CPM	Have a Monitoring Plan. Submit quarterly reports to MDAQMD Daily NO <sub>x</sub> emissions in ppm and lbs/hr Quarterly total tons emitted for NO <sub>x</sub> based on CEMS data	Ongoing

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CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS
			Quarterly total tons for particulate and CO based on compliance test and fuel consumption Number of exceedances of permit limits, the corresponding maximum & duration of each exceedance Rolling average NO <sub>x</sub> emissions for HTF heaters, diesel generators, diesel fire pumps When CEMS data is missing, use previous 24 hours of NO <sub>x</sub> emission data Records of fuel oil purchase, sulfur content, quantity and Btu content Natural gas consumption Submit annual reports to CEC Send quarterly reports to MDAQMD	
AQ 1-30 VIII & IX	Operating logs	MDAQMD CARB CEC	Maintain daily operating logs & charts on-site; retain for 1 year	Ongoing
AQ 1-31	Air monitoring		Monitor air quality and submit data Obtain approval to cease	Complete
AQ 1-32	Fugitive dust controls		Comply with MDAQMD 401, 402 & 403. Have an approved Dust Control Plan.	Ongoing
AQ 1-33		MDAQMD		Ongoing

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<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
VIII & IX	Diesel Gen Set & Fire Pump: Use low sulfur diesel, submit records	CEC	Submit data in quarterly report to incl records of fuel oil purchased, sulfur content, quantity, and BTU value. Diesel generator and fire pump fuels must contain less than 0.5% sulfur by weight	
AQ 1-34 VIII & IX	Control of unregulated pollutants	MDAQMD CEC	Do not use hexavalent chromium compounds in cooling tower water circulating system	Ongoing
AQ 1-37 IX AQ 1-38 VIII	Emission limits	MDAQMD CEC	NO <sub>x</sub> limit at 547 lbs/day for aggregate of all equipment and 45.9 tons on rolling annual average. Restrict CO & particulate emissions to values in tables I, II, & III Submit above data in quarterly report	Ongoing  Ongoing  Ongoing
AQ 1-38 IX AQ 1-39 VIII	Missing CEMS data	MDAQMD CEC	Use average data when CEMS is out of service. Submit Missing Data Nox emissions calculations in Quarterly Report	Ongoing
AQ 1-39(4) IX AQ 1-40(4) VIII	Notification and recordkeeping	MDAQMD EPA CEC	Notify EPA and APCD if emissions exceed 547 lbs/day average Maintain five-year file of CEMS data	Ongoing
AQ 1-40		MDAQMD		Ongoing, as needed

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<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
IX AQ 1-41 VIII	Prevention of significant deterioration	CEC	Review emission changes for 100-ton/year level If site is a major source, file for PSD permit	Ongoing, as needed
AQ 1-41 IX	HTF heater operation		Correct SEGS VIII heater design that caused accident Agency approval before firing IX	Complete Complete
<b>BIOLOGICAL RESOURCES</b>				
BR 1 (BRMIP 5.0)	Habitat compensation		Enter into agreement with CDFG Provide for Mohave ground squirrel habitat Provide for off-site desert tortoise habitat Transfer title of ownership to CDFG Deposit land purchasing funds Provide funds for enhancement and management including Annual Maintenance payments. Provide CEC with signed copy of agreement with CDFG Notify CEC of land purchases, subject to consultation with CDFG, BLM and USFWS	Complete Complete Complete Complete Complete Complete Complete Complete
BR 2			Submit signs, letters, etc. to the CEC	Complete

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<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
VIII	Public notice of habitat compensation			
BR 2 (BRMIP 2.0) IX BR 3 VIII	Designated biologist		Submit qualifications of biologist to CEC for approval. If change biologists, submit qualifications for approval.	Complete Ongoing, as required
BR 3 (BRMIP 4.1) BR 4a VIII	Surface disturbance restrictions		Designate off-limit areas Obtain approval from designated biologist for any surface disturbance	Complete Ongoing, as required
BR 4 (BRMIP 4.2) IX BR 4b VIII	Off-road travel restrictions		Prohibit off-road travel in sensitive biological areas. Post signs, Include in Environmental Awareness Training.	Complete Ongoing (for Operations)
BR 4c VIII	Transmission line plant survey		Identify botanically sensitive areas along transmission line	Complete
BR 4d VIII	Temporary travel ways		Designate temporary travel ways along the transmission lines	Complete
BR 4e VIII	Wildlife preservation		Identify active desert tortoise & Mohave ground squirrel burrows along transmission lines	Complete

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				Date: February 07, 2016
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS
			Obtain MOU from CDFG Salvage & relocate desert tortoises as needed	Complete Complete
BR 4h VIII BR 8 IX (BRMIP 4.6)	Employee Awareness Training	CEC CPM USFWS CDFG	Provide training to new employees; keep records Provide brochure to contractors Post brochure	Ongoing  Ongoing
BR 4j (BRMIP 4.10) VIII	Anti-perching devices		Install anti-perching (Nixalite) devices on transmission line towers & poles Monthly inspection by designated biologist during raven nesting season for at least 5 years	Complete  Complete
BR 5 IX (BRMIP 4.3)	Desert tortoise preservation		Salvage & relocate desert tortoises as needed Obtain MOU from CDFG Obtain Section 7 Consultation from USFWS	Ongoing  Complete Complete
BR 5 VIII	Wetlands Enhancement Plan	CEC CPM	Submit plan for approval Discharge blowdown to north marsh unless detrimental to wildlife In lieu of marsh discharge, construct evap ponds	Deleted April 26, 2000  Deleted April 26, 2000  Deleted April 26, 2000

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COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX				
				Date: February 07, 2016
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS
			Monitor water quality & wildlife usage of wetlands or ponds	
BR 6 (BRMIP 4.4) BR 4f VIII	Desert tortoise fencing	CEC	Construct permanent tortoise-proof fence around facility Fence design approval from CEC/CDFG/ USFWS/BLM Construct tortoise fence on HLR	Complete  Complete  Complete
BR 7 (BRMIP 4.5) IX BR 4g VIII	Speed limits		Post speed limits along travel ways Obtain approval from CDFG	Complete Complete
BR 8 (BRMIP 4.6) IX	Employee environmental awareness program	CEC	Provide educational brochure Conduct employee orientation Distribute "Sensitive Wildlife Observation Forms" to all employees Collect employee signed affidavits	Complete Ongoing, as required Complete  Complete
BR 8 (BRMIP 7.0) VIII	Central & southern wetlands study		Submit study protocol to CEC for approval Conduct investigations of central & southern marshes for two years Convey discharge water to marshes	Complete  Payment pending  On hold, pending COC amendment
BR 9				Complete

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<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
IX (BRMIP 4.7) BR 4i VIII	Trash and litter control program		Supply covered trash and litter receptacles in strategic locations Bury trash and litter or dispose of in covered dumpsters	Complete
BR 9 VIII (BRMIP 8.0)	Agricultural discharge to wetlands		Monitor agricultural discharge to southern & central marshes Notify CEC of any changes in discharge volumes Provide supplemental well water to discharge water as needed	Complete Complete Complete
BR 10 IX (BRMIP 4.8) BR 4k VIII	Habitat restoration		Restoration/revegetation of temporarily disturbed areas	Complete
BR 11 (BRMIP 6.0) IX	Evaporation pond monitoring plan		Maintain appropriate pond depth Maintain fencing Conduct annual invertebrate sampling Conduct lab analysis of samples Notify CEC and CDFG if selenium levels exceed 4 ppm  Submit quarterly pond monitoring report to CDFG	Ongoing Ongoing Ongoing Ongoing, as required  Ongoing Ongoing

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				Date: February 07, 2016
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS
			Allow up to 75 ac ft of water per year to BLM for north marsh enhancement. Submit annual BLM usage to CEC.	
BR 11 (BRMIP 6.0) VIII	Transmission line mitigations		Prepare transmission line mitigation measures Submit transmission line mitigations for CEC approval Implement transmission line mitigation measures	Complete  Complete  Complete
BR 12 (BRMIP 8.0)	BRMIP approval		Submit BRMIP to CEC for approval	Complete
BR 13 (BRMIP 8.0) IX BR 6 VIII	Implement and monitor compliance issues	CEC CPM	Submit monthly compliance status report to CEC Submit annual compliance report from designated biologist to CEC Notify CEC of any adverse impacts to sensitive species	Complete  Ongoing  Ongoing
BR 14 (BRMIP 8.0) IX BR 7 VIII	Site access		Provide letter of authorization to CEC	Complete
BR 3-BR 11	Weekly activity report		Notify CEC in the weekly report	Ongoing

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<b>WATER RESOURCES</b>				
WR 1	Well logs and data		Submit logs and data	Complete
WR 2 VIII & IX	Extracted groundwater consumption	CEC CPM LRWQCB	Provide for each well extracting groundwater in Annual Compliance Report: standing water levels, pumping rates, total water extraction	Ongoing
WR 3	Water well flow meters		Submit as-built drawings to CEC	Complete
WR 4 IX	Water supply	CEC LRWQCB	Limit groundwater extractions to 950 acre/ft per yr; provide data	Ongoing
WR 4 VIII	NPDES permit for cooling tower blowdown		Obtain WDR from LRWQCB	Complete
WR 6 IX	Waste discharge requirements (WDR) for condensate system		Obtain WDR from LRWQCB	Complete
WR6 VIII	Liquid discharge to ponds	CEC CPM	Inform CEC of change in WDR's Submit with Annual Report copies of quarterly reports to LRWQCB and status of current waste disch requirements	Ongoing
WR 7			Obtain WDR from LRWQCB	Complete

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<b>CONDITION</b>	<b>ISSUE</b>	<b>SUBMIT TO</b>	<b>PERMIT REQUIREMENTS</b>	<b>STATUS</b>
IX WR 5 VIII	WDR for cooling tower blowdown			
WR 7 VIII	Erosion control plan		Submit plan to CEC	Complete
WR 8 IX WR 6 VIII	Water Quality	CEC CPM LRWQCB	Notification of changes in LRWQCB WDRs Quarterly reports Submit status of current WDRs	Ongoing, as required  Ongoing Ongoing, as required
WR8 VIII	Flood Hazard	CEC CPM	Protect adjacent private property from flooding, scouring & erosion as result of operations Submit Annual statement in Annual Compliance Report describing any maintenance or repairs on adjacent private property due to flooding, scouring, erosion	Complete  Ongoing, as required
WR 9	Protect land from runoff for 25-year (not 100) storm		Construct dike along north boundary of Section 13 Prepare as-builts	Complete  Complete
WR 10 IX WR 12 & 13 VIII	Water flow easements		Obtain easements or provide flood protection	Complete

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WR 11	Extend 100 year dike & channel to southern border of Section 25		Certify to CEC that dike & channel will be built	Complete
WR 14 VIII	Well permits	CEC CPM	Submit all copies of well drilling permits in Annual Compliance Report	Ongoing
<b>SOCIOECONOMICS</b>				
SE 4 IX SE 2c VIII	Payments to schools	CEC	Submit copies of checks Submit copies of signed agreements	Complete Complete
SE 7 VIII	Impacts to local fire protection	CEC CPM	Mitigate impacts caused to local fire protection agencies Identify demand placed on local agencies in Quarterly Reports & specify agency costs paid by LSP. CEC may require additional compensation.	Ongoing
SE 8	Fire protection agreement		Sign agreement	Complete
<b>PUBLIC HEALTH</b>				
PH 1	HTF barrier	CEC		Complete

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CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS
		SBCCBO	Prepare plan for barriers to protect HTF piping Submit plan Install barriers	Complete Complete
PH 2	HTF release plan	CEC	Submit documentation of procedures Inform CEC of training schedule	Complete Complete
PH 3	Construction employee protection plan	CEC	Develop/implement plan Install required equipment	Complete Complete
PH 4	Employee protection plan	CEC	Develop/implement plan Install required equipment	Complete Complete
PH 5 IX	Protective equipment	CEC	Provide equipment	Complete
PH 5 VIII	Materials handling procedures		Submit procedures to CEC	Complete
PH 6 VIII & IX	Cooling tower water treatment	CEC	Obtain written approval for use of chemicals not in Table 2	Ongoing, as required
PH 7 IX	Extremely hazardous materials	CEC	Do not use chemicals listed extremely hazardous without an approved Risk Management Prevention Program	Ongoing, as required

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<b>WASTE MANAGEMENT</b>				
WM 1 VIII & IX	Disposal of hazardous & non-hazardous wastes		Dispose of waste at approved facilities Provide verification to CEC via compliance reports	Ongoing, as required Ongoing, as required
WM 2	Solid waste management plan		Submit plan to CEC □ 6 months after project certification	Complete
WM 3 IX WM 6 VIII	Waste summary report	CEC CPM	Submit description of project related hazardous waste, including: quantity and type of waste, disposal methods, and facilities used	Ongoing
WM 3 VIII	Use of alternative anti-corrosion agent	DHS CEC CPM LRWQCB	If anti-corrosive agent is used, test waste for hazardous determination Obtain waste discharge permit from LRWQCB if required	Ongoing, as required Ongoing, as required
WM 4 IX WM 2 VIII	Hazardous waste generator permit for HTF		Obtain permit from DTSC (CDHS)	Ongoing

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WM 5 IX WM4 VIII	Hazardous waste storage	DHS CEC CPM	If hazardous waste is stored over 90 days obtain determination Notify if Hazardous Waste Facility Permit is granted by DHS Store & dispose of waste per DHS regulations	Ongoing, as required  Ongoing, as required  Ongoing
WM 5 VIII	Sanitary waste disposal		Submit	
WM 6 IX WM 7 VIII	Waste-related enforcement action	CEC CPM	Notify CEC of any action against owner or waste handlers	Ongoing, as required
WM 7 IX WM 8 VIII	HTF shipment records	CEC CPM	Maintain records of all HTF shipments	Ongoing
WM 8 IX WM9 VIII	HTF spill □20 gallons	CEC CPM	Notify CEC within 48 hours Submit written verification of the spill & clean-up measures	Ongoing, as required
WM 9 IX WM 10	HTF spill cleanup to <3000 ppm	CEC CPM	Clean up spills to level that leaves < 3000mg/kg of HTF in soil	Ongoing, as required

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VIII			Submit spill report to CEC within 30 days Submit a manifest of disposed HTF	
WM 11 VIII	Solid waste management plan		Submit plan to CEC < 6 months after project certification	Complete
<b>PUBLIC AND WORKER SAFETY</b>				
PWS 1	Heater Operating, SUS, and Emergency SD Procedure and Operator Training Program	CEC CPM	Procedure to also address errors that could result from operation of different heater designs by same personnel in same control room. Staff Training on these procedures.	
PWS 2	Yearly Status Reports	CEC CPM	Yearly Status Reports on Equipment Failures and effectiveness of inspection and maintenance procedures on critical systems.	
<b>SAFETY &amp; FIRE PROTECTION</b>				
ISFP 1 IX PWFS 1	Safety plan	CEC CPM	Implement Safety Plan Provide access to project area, facilities & maintain records	Complete Ongoing
ISFP 2	Certificate of Occupancy		Obtain certificate from SBCFFW	Complete

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			Submit copy to CEC	Complete
PWFS 2 VIII ISFP p. 386	Fire protection element of safety plan Fire safety		Develop fire brigade training program Maintain fire-fighting equipment	Complete Ongoing
<b>POWER PLANT RELIABILITY</b>				
PPR 1	Preventive maintenance program		Inventory management plan Maintenance and repair training program	Complete Ongoing
PPR 2 VIII & IX	Operational Logs	CEC CPM	Maintain logs of equipment failure data & operational data for all major equipment Maintain monthly operational data	Ongoing
<b>QUALIFYING FACILITY STATUS</b>				
QFS 1 VIII & IX		CEC CPM	Operate facility in accordance with requirements of Title 18 CFR Continuously monitor total energy input	Ongoing

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<b>TRANSMISSION LINE SAFETY &amp; NUISANCE</b>				
TLSN 6 VIII & IX	Transmission line maintenance	CEC CPM	Keep transmission line pole sites free from rubbish Provide information about inspection, clean up & fire protection near poles	Ongoing  Ongoing
<b>FACILITY SECURITY &amp; DECOMMISSIONING</b>				
DC 1 VIII	Decommissioning	CEC CPM	File decommissioning plan	12 months before decommissioning
FS/DC 2 IX	Decommissioning	CEC CPM	File decommissioning plan in IX's 25th year of operation Pre-filing workshop with CEC	Ongoing, as required
FS/DC 3 IX	Decommissioning	CEC CPM	Obtain approval prior to decommissioning activities	12 months before decommissioning
FS/DC 1 IX	Updates to security & facility maintenance plan	CEC CPM	Submit updates to Plan, including the adequacy of the security/decommissioning fund	Ongoing
<b>MISCELLANEOUS</b>				

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N 1	Noise complaints		Develop noise complaints program	Complete
N 2	Public noise surveys	CEC	Conduct surveys & submit report	Complete
N 3	Occupational noise surveys	CEC	Conduct surveys & submit report	Complete
N 4	IC engine noise		Install mufflers	Complete
PCR 1-8	Paleontological & cultural resources		All surveys, plans & reports	Complete
PCR 7	Final paleontological resources report		Submit final report to CEC Submit final report to Paleo Library	Complete
PCR 13	Cultural resources found		Maintain files showing proof of cultural resource analysis	Complete
PCR 15	Final cultural resources report		Maintain on file	Complete
PCR 16	Agreements for cultural resource curation		Maintain on file	Complete
TT1	Transportation Permits submittal	CEC CPM	In Quarterly Reports notify the CEC of any Transportation Permits	
TT 5 IX			Sign agreement 60 days after CEC decision	Request to amend; COC pending

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CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS
	Agreement for reconstruction of Harper Lake Road			
TT7 VIII TT6 IX	Accident occurrences on the 4 San Bernardino roads	CEC CPM & SBCFCTD	Monitor and Report in Quarterly Reports traffic accident occurrences on the 4 roads. Report on current status of consultations with SBC Flood Control & Transportation Dept.	
TT 11 VIII	Railroad crossing gate/signal/light installation		Submit construction plan to CEC	Complete
TT 12	Maintenance Plan for Hoffman Road		Submit Hoffman Rd Maintenance Plan prior to Operations	
VR 1	Exterior color scheme for buildings		Submit color plan to CEC	Complete
VR 2	Light shielding		Install light shields and reposition lights	Complete
VR 3	Visual screening		Develop plan Submit plan to CEC Notify CEC after installation	CEC surveyed neighbors No changes required No installation necessary

**Construction/Operation Schedule**

## 2021 Operation Schedule

January

We anticipate firing heaters only for freeze protection during the month of January. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Natural gas may be utilized for production, if it is deemed cost effective. SEGS VIII and SEGS IX will be out of service for maintenance outages in January.

February

We anticipate firing heaters only for freeze protection during the month of February. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Power generation will be in solar only mode.

March

We anticipate firing heaters only for freeze protection during the month of March. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,000 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Power generation will be in solar only mode.

April

We anticipate firing heaters only for freeze protection during the month of March. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,000 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Power generation will be in solar only mode.

May

We anticipate power generation will be in solar only mode.

June – July – August – September

During the peak season we anticipate power generation will be in solar only mode.

October

We anticipate power generation will be in solar only mode at SEGS IX. We anticipate SEGS VIII to be shut down for repowering.

## 2020 ANNUAL COMPLIANCE REPORT

### VI. CONDITIONS OF CERTIFICATION

### SEGS VIII & IX

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#### November

Power generation will be in solar mode only. The heaters may be used at SEGS IX for freeze protection during the month of November. This operation is necessary when the temperature of HTF in the systems is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf. We anticipate SEGS VIII to be shut down for repowering.

#### December

Power generation will be in solar only mode. The heaters may be used at SEGS IX for freeze protection during the month of December. This operation is necessary when the temperature of HTF in the systems is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf. We anticipate SEGS VIII to be shut down for repowering.

## 2020 ANNUAL COMPLIANCE REPORT

VI. CONDITIONS OF CERTIFICATION

SEGS VIII & IX

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### **Facility Changes**

There were no changes to the facility during the 2020 calendar year.

## 2020 ANNUAL COMPLIANCE REPORT

VI. CONDITIONS OF CERTIFICATION

SEGS VIII & IX

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### **2020 Elapsed Submittals**

To the best of our knowledge all submittal deadlines were met during the 2020 calendar year.

**Filings with Other Governmental Agencies**

## 2020 Additional Filings

The following is a summary of the filings made during 2020 with governmental agencies having permitting authority over the SEGS VIII and IX projects.

- All quarterly semi-annual and annual reporting was submitted on schedule in 2020 to the Mojave Desert Air Quality Management District, the California Regional Water Quality Control Board-Lahontan Region, and the Mojave Basin Area Watermaster.
- All permit renewals and fees were submitted on schedule in 2020, to the San Bernardino County Fire Department, the Environmental Health Services, the Environmental Public Works Agency, the Mojave Desert Air Quality Management District, the State Board of Equalization, the Lahontan Regional Water Quality Control Board, and the San Bernardino County Fire Warden.
- The Emissions Compliance and Monitor Certification Testing Report was submitted to the Mojave Desert Air Quality Management District on schedule in August 2020.

# 2020 ANNUAL COMPLIANCE REPORT

VI. CONDITIONS OF CERTIFICATION

SEGS VIII & IX

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## **Onsite Compliance File – Additions / Deletions**

## 2020 ANNUAL COMPLIANCE REPORT

VII. WATER RESOURCES / WATER

SEGS VIII & IX

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### **Lahontan Regional Water Quality Control Board Annual Report**

The Second Semi-Annual 2020 Monitoring Report was submitted under separate cover.

**Waste Discharge Requirements**

The Waste Discharge Requirements were included in the 2000 Annual Compliance Report to the California Energy Commission.

The waste discharge requirements as issued by the Lahontan Regional Water Quality Control Board under Board Order #6-98-74 remain in effect and were unchanged during the 2020 calendar year.

## 2020 ANNUAL COMPLIANCE REPORT

VII. WATER RESOURCES / WATER

SEGS VIII & IX

### Production Well Data

#### Depth to Groundwater Measurements

Well Number	State Well Number	Date of Measurement	Depth to Water (feet)	Approximate Surface Elevation (feet msl)	Approximate Water Elevation (feet msl)	Comments
P34	11N/4W-19E	8/28/2020				Out of commission requiring overhaul.
P35	11N/4W-19E	8/28/2020	161.1	2058	1892	
P36	11N/4W-19Q	8/28/2020	153.8	2058	1904	
P40	11N/4W-19J	8/28/2020	134.2	2039	1905	

#### Production Well Pumping Rate

Well Number	State Well Number	Average Well Pumping Rate (gallons per minute)
P34	11N/4W-19E	
P35	11N/4W-19E	539
P36	11N/4W-19Q	741
P40	11N/4W-19J	1103

#### Production Well Total Annual Extractions

Well Number	State Well Number	Annual Extraction Amount (acre-feet)
P34	11N/4W-19E	2.34
P35	11N/4W-19E	559.65
P36	11N/4W-19Q	9.19
P40	11N/4W-19J	317.24

**Condition of Certification – WATER-8**

Luz Solar Partners VIII & IX have implemented measures adequate to protect adjacent private property from flooding, scouring, and erosion as a result of the operation of the SEGS Unit VIII and SEGS Unit IX and have fully complied with the SEGS Unit VIII Condition of Certification WATER-8 during the calendar year 2020.

Luz Solar Partners VIII & IX did not perform any road maintenance or other required repairs on adjacent properties in the 2020 calendar year since there were no damages to adjacent properties as a result of flooding, scouring, or erosion.

**Decommissioning Fund**

Luz Solar Partners VIII & IX have continued to assess the potential regional market for willing purchasers of the Heat Transfer Fluid (HTF) for use as a fuel source.

Luz Solar Partners VIII filed a preliminary decommissioning plan with the CEC in compliance with FS/DC Condition 2.

2020 ANNUAL COMPLIANCE REPORT

IX. TRAFFIC AND TRANSPORTATION

SEGS VIII & IX

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**Proof of Pollution Insurance**



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

03/12/2020

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).**

<b>PRODUCER</b> MCGRIFF, SEIBELS & WILLIAMS, INC. P.O. Box 10265 Birmingham, AL 35202	<b>CONTACT NAME:</b> PHONE (A/C, No, Ext): 800-476-2211		<b>FAX (A/C, No):</b>
	<b>E-MAIL ADDRESS:</b>		
<b>INSURER(S) AFFORDING COVERAGE</b>			<b>NAIC #</b>
<b>INSURER A :</b> Hartford Fire Insurance Company			19682
<b>INSURER B :</b>			
<b>INSURER C :</b>			
<b>INSURER D :</b>			
<b>INSURER E :</b>			
<b>INSURER F :</b>			

**INSURED**  
 Terra-Gen, LLC including Luz Solar Partners Ltd, VIII & IX  
 437 Madison Avenue  
 22nd Floor, Suite A  
 New York, NY 10022

**COVERAGES**

CERTIFICATE NUMBER:93MM2EYC

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input checked="" type="checkbox"/> LOC OTHER:			21 UEJ JA3519	03/15/2020	03/15/2021	EACH OCCURRENCE	\$ 1,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence)	\$ 300,000
							MED EXP (Any one person)	\$ 10,000
							PERSONAL & ADV INJURY	\$ 1,000,000
							GENERAL AGGREGATE	\$ 3,000,000
							PRODUCTS - COMP/OP AGG	\$ 3,000,000
								\$
	<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident)	\$
							BODILY INJURY (Per person)	\$
							BODILY INJURY (Per accident)	\$
							PROPERTY DAMAGE (Per accident)	\$
								\$
	<b>UMBRELLA LIAB</b> <input type="checkbox"/> OCCUR <b>EXCESS LIAB</b> <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE	\$
							AGGREGATE	\$
								\$
	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below						PER STATUTE	OTH-ER
							E.L. EACH ACCIDENT	\$
							E.L. DISEASE - EA EMPLOYEE	\$
							E.L. DISEASE - POLICY LIMIT	\$
								\$
								\$
								\$
								\$

**DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)**  
 The General Liability policy includes sudden and accidental pollution coverage, and Certificate Holder is included as Additional Insured, if required by written contract, subject to policy terms, conditions, and exclusions.

**CERTIFICATE HOLDER**

California Energy Commission Siting, Transmission & Environmental Protection (STEP) Division  
 1516 9th Street, MS-2000  
 Sacramento, CA 95814

**CANCELLATION**

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

**Traffic and Transportation Road Monitoring**

**Conditions of Certification – TRANS-7 (VIII) & TRANS-6 (IX)**

Luz Solar Partners VIII & IX has record of no accidents on Harper Lake, Hoffman, and Lockhart Roads, and Santa Fe Avenue during the 2020 calendar year involving SEGS VIII & IX Operations. As a result of this monitoring, no further mitigation measures were proposed by Luz Solar Partners VIII & IX in 2020.