DOCKETED	
Docket Number:	98-AFC-02C
Project Title:	La Paloma Generating Project
TN #:	254720
Document Title:	2023 Annual Compliance Report for La Paloma Generating Plant
Description:	2023 Annual Compliance Report for La Paloma Generating Plant
Filer:	Ashley Gutierrez
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	2/28/2024 1:49:54 PM
Docketed Date:	2/28/2024

La Paloma
Generating Plant
CXA La Paloma, LLC

POB175 (Mail)
1760 W. Skyline Road
(Deliveries)
McKittrick, CA 93251

661.762.6000
661.762.6041 Fax

February 27, 2024

Ashley Gutierrez
Compliance Project Manager
California Energy Commission
1516 Ninth Street, MS 2000
Sacramento, CA 95814

Subject: **La Paloma Generating Plant**
Annual Compliance Report - 2023

Dear Ms. Gutierrez:

Pursuant to Section IV of the Commission Decision for the CXA La Paloma Project, CXA La Paloma, LLC herewith submits the 2023 Annual Compliance Report for the La Paloma Generating Plant in an electronic format.

If there are any questions, please call Paul Sumal at 661.762.6055 or me at 661.762.6002.

Sincerely,

Terry Benson
Plant Manager
La Paloma Generating Plant

cc: w/attachment P. Sumal CEC file
pdf w/ attachment J. Scott F. Schneider K. Brandt M. Nelson

File No. 705.02.08.01

CXA LA PALOMA, LLC

CALIFORNIA ENERGY COMISSION
DOCKET NO. 98-AFC-2

ANNUAL COMPLIANCE REPORT

YEAR: 2023

LA PALOMA GENERATING PLANT
McKITTRICK, CA

TABLE OF CONTENTS

SUMMARY

Background

The California Energy Commission (Energy Commission) certified the La Paloma Generating Project on October 6, 1999. The project consists of four natural gas-fired, combined-cycle gas turbines, utilizing ABB GT24 combustion turbine technology. A construction contract was signed between La Paloma Generating Company, LLC (LPGC) and Alstom Power in November 1999. Pre-construction activities began during November 1999, and site clearing/grading commenced in March 2000. LPGC took care, custody, and control of all four units in March 2003. Commercial operations also began in March 2003. CXA La Paloma, LLC took care, custody, and control of all four units in December 2017, and is owned by Capital Power Investments LLC as of February 2024.

In accordance with the provisions in Section IV of the Commission Decision, CXA La Paloma, LLC shall submit an Annual Compliance Report for each year of commercial operation due on a date agreed to by the Compliance Project Manager (CPM), which is March 1.

Project Activities

Facility availability for 2023 was 83.7 percent.

Environmental Compliance

No "Take" of any state or federal threatened & endangered listed species occurred in 2023, and no cultural or paleontological resources were encountered. Additionally, no noise or visual complaints were received by the project in 2023.

ANNUAL COMPLIANCE REPORT

1) COMPLIANCE MATRIX

An updated Compliance Matrix, as of December 31, 2023, is included as Attachment A. As stated in the Commission Decision, completed, or fully satisfied conditions do not need to be included in the matrix. Therefore, the Compliance Matrix in Appendix A presents only those requirements that are ongoing requirements.

2) PROJECT OPERATING STATUS

Calendar year 2023 was the twentieth full year of commercial operation. The facility's 2023 operating monthly availability factors ranged from a minimum availability of 71.1% in February and maximum availability of 95.8% in November. In addition, availability was affected by scheduled Spring/Fall and forced outages. Further, the units were occasionally dispatched off-line based on Cal ISO and market power needs. The operating status of the facility remains unchanged from the prior reporting period.

3) DOCUMENTS FOR SPECIFIC CONDITIONS

Some of the Conditions of Certification (COCs) in the Commission Decision require the submittal of documentation with the Annual Compliance Report. Refer to the "CONDITIONS OF CERTIFICATION" section below for a discussion of the COCs which are required to be addressed.

4) POST-CERTIFICATION CHANGES

A cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM are included as Attachment B.

5) MISSED SUBMITTAL DEADLINES

The facility met the submittal deadlines specified in the Conditions of Certification during the 2023 compliance period.

6) GOVERNMENTAL AGENCY FILINGS

A list of filings made to, and permits issued by, other governmental agencies during 2023 is included as Attachment C.

7) PROJECT COMPLIANCE ACTIVITIES FOR 2024

A list of project compliance activities scheduled for 2024 is included as Attachment D.

8) ADDITIONS TO ON-SITE COMPLIANCE FILE

A list of 2023 additions to the on-site compliance file is included as Attachment E.

9) EVALUATION OF ON-SITE CONTINGENCY PLAN

Revisions to the On-Site Contingency Plan are included in Attachment F. Revisions reflect changes in safety procedures.

CONDITIONS OF CERTIFICATION

TLSN-2

No transmission line-related complaints were received during the reporting year.

TLSN-4

An annual inspection of the transmission line right-of-way from the plant to the Midway Substation was conducted in 2023 by an outside contractor, and CXA La Paloma. LLC maintenance personnel conducted monthly inspections. Any trash or other combustible material found during those inspections was removed.

HAZ-1

A list of hazardous materials used at the plant in reportable quantities is included as Attachment G.

BIO-3

The 2023 Annual Biological Report for the project is included as Attachment H.

SOIL & WATER-4

In 2007, LPGC submitted an Underground Injection Control (UIC) permit application to the USEPA and a request for an amendment to the Energy Commission Decision to accommodate the revised program. The Energy Commission approved that amendment in August 2007, and the USEPA issued Class I Non-Hazardous UIC Permit No. CA10710001 to LPGC in March 2008. Authorization to Inject was issued by the USEPA in May 2009. Subsequently, injection well WD-3 commenced operation in May 2009.

CXA La Paloma, LLC submitted UIC permit renewal application to USEPA in October 2017. A complete application e-mail was received from USEPA in March of 2018 for continuation of expiring permit during the permit renewal process. A revised permit renewal application was submitted to USEPA in January of 2019. USEPA issued a new permit R9UIC-CA1-FY17-1R for the injection well WD-3 in November of 2021 for a another ten (10) year period.

A total of 67,068,498 gallons of wastewater were injected from January through December 2023.

The Zero Liquid Discharge (ZLD) system did not operate in 2023, therefore no residual cake solids were generated for disposal.

WASTE-1

Waste Generation and Disposal

During 2023 waste was generated from plant operations, maintenance activities, and repairs. Waste streams included those shown in Table 1 below:

Table 1: 2023 Waste Generation at LPGP

Waste Streams	Actual	Plan	Waste Classification	Receiving Facilities	Comments
Water Wash Recovery Tank Debris	0 tons	500 tons	Non-Hazardous	McKittrick Waste	Generated during C Outage
Non- Haz Waste Sediment	392.38 tons	1000 tons	Non-Hazardous	McKittrick Waste	
ZD Brine Water	0 tons	500 tons	Non-Hazardous	McKittrick Waste	Only generated when operating ZD Boiler
ZD Cake	0 tons	50 tons	Non-Hazardous	McKittrick Waste	Only generated when operating ZD Boiler
WD3 Well Sand Water Mixture	56.32 tons	200 tons	Non-Hazardous	McKittrick & Kettleman Waste	Generated during cleanout of the well
Non Haz Filters	0.34 tons	25 tons	Non-Hazardous	McKittrick Waste	
GT Air Filters	2.81 tons	25 tons	Non-Hazardous	McKittrick Waste	
ZD Filter Debris	0 tons	100 tons	Non-Hazardous	McKittrick Waste	Only generated when operating ZD Boiler
Turbine Wash Water	0 tons	25 tons	Non-Hazardous	McKittrick Waste	Generated during C Outage
Cooling Tower Sludge	3.87 tons	50 tons	Non-Hazardous	McKittrick Waste	Generated during C Outage

Waste Streams	Actual	Plan	Waste Classification	Receiving Facilities	Comments
Treated Wood	56.28 tons	100 tons	Non-Hazardous	McKittrick Waste	Generated during C Outages
Cooling Tower Fill	67.03 tons	25 tons	Non-Hazardous	McKittrick Waste	Generated during C Outages
EVAP Media Filter	3.57 tons	25 tons	Non-Hazardous	McKittrick Waste	Generated during C Outages
Clarifier Waste	0 tons	25 tons	Non-Hazardous	McKittrick Waste	Generated during Plantwide Outage
Clarifier Sludge	0 tons	1000 tons	Non-Hazardous	Patriot Wastewater Facility	Generated during Plantwide Outage
Cardboard	0 cu yds	120 cu yd	Non-Hazardous	Westside Waste Mgmt.	Included in comingled recyclables
Comingled Recyclables	36 cu yds	36 cu yd	Non-Hazardous	Westside Waste Mgmt.	
Empty Totes	1920 lb.	15000 lb	Non-Hazardous	S El, Monte, CA	
Empty 55-gallon Drums	0 lb	1500 lb	Non-Hazardous	S El, Monte, CA	
Used Desiccant	450 lb	1500 lb	Non-Hazardous	Heritage-Crystal Clean	Filter media
Empty Totes	160	1500 lb	Non-Hazardous	Heritage-Crystal Clean	
Empty 55-gallon Drums	0 lb	1500 lb	Non-Hazardous	Heritage-Crystal Clean	
Empty 5-gal Pails	0 lb	25 lb	Non-Hazardous	Heritage-Crystal Clean	
Trash	45.59 tons	100 tons	Non-Hazardous	Westside Waste Mgmt.	
Ammonia Salts	1245 lb	2500 lb	CA Hazardous	Crosby & Overton	Generated during C Outages

Waste Streams	Actual	Plan	Waste Classification	Receiving Facilities	Comments
Ammonia Filters	25 lb	100 lb	CA Hazardous	Crosby & Overton	
Aluminum Oxide (sand blast media)	0 lb	5000 lb	CA Hazardous	Heritage-Crystal Clean	Generated during major turbine outages
Waste Chemicals	2085 lb	5000 lb	CA Hazardous	Pacific Resource Recovery	Contaminated / Unusable Chemicals
Used Oil Filters (drained)	1845 lb	5000 lb	CA Hazardous	Heritage-Crystal Clean	More waste is generated with increase in operations
Oily Rags and Absorbents	3090 lb	5000 lb	CA Hazardous	Heritage-Crystal Clean	More waste generated during C Outage / Plantwide outage
Oily Water	0 gallons	10000 gallons	CA Hazardous	Heritage-Crystal Clean	Mostly generated from oil containments during excess rains and Generated from oil-water separator cleanout during Plantwide outage.
Used Oil	1231 gallons	5000 gallons	CA Hazardous	Heritage-Crystal Clean	More waste is generated with increase in operations
Used Oil with Natural Gas Trace	0 gallons	2000 gallons	CA Hazardous	Heritage-Crystal Clean	Generated from oil separators on natural gas line.
Oil/Diesel	0 gallons	200 gallons	CA Hazardous	Heritage-Crystal Clean	
Waste Paint Related Material	0.15 tons	< 5 tons	Hazardous	Pacific Resource Recovery / Kettleman Waste	Expired or not usable paint related material
Flammable-Corrosive waste	0.02 tons	< 5 tons	Hazardous	Pacific Resource Recovery / Kettleman Waste	Expired or not usable material

Waste Streams	Actual	Plan	Waste Classification	Receiving Facilities	Comments
Empty Totes	308 lb	10000 lb	Hazardous	S El, Monte, CA	
Empty 55-gallon Drums	0 lb	1000 lb	Hazardous	S El, Monte, CA	
Ammonium Sulfate	57 lb	< 5 tons	Hazardous	Crosby & Overton	
Waste Carbon	0 lb	< 5 tons	Hazardous	Crosby & Overton	
Flammable Solid, (Natural Gas)	320 lb	1000 lb	Hazardous	Pacific Resource Recovery	Oil filter waste from natural gas line.
Hexavalent Chromium	0 tons	< 5 tons	Hazardous	Crosby & Overton	
Sulfuric Acid Waste	0.04 tons	< 1 tons	Hazardous	Crosby & Overton	
Batteries	50 lb	200 lb	Universal Waste	Heritage-Crystal Clean	
Batteries, Large	0 lb	1500 lb	Universal Waste	Heritage-Crystal Clean	
Electronic Waste	1000 lb	5000 lb	Universal Waste	Heritage-Crystal Clean	
Florescent Lights	400 ft	2000 ft	Universal Waste	Heritage-Crystal Clean	
Metal Halides Bulbs	70 lb	200 lb	Universal Waste	Heritage-Crystal Clean	
Aerosol Cans (Empty)	70 lb	500 lb	Universal Waste	Heritage-Crystal Clean	

Note: The plan numbers are annual numbers assuming all four Units will be running at full load.

Recycling

Of the wastes identified in Table 1, comingled recyclables including cardboard, used oil, used oil filters, batteries, fluorescent lamps, and electronics waste were shipped off-site for recycling.

Labeling, Storage, and Inspection

Regular inspections of the waste storage area were conducted to ensure that waste was properly contained, containers were properly labeled, and waste was not stored on-site for longer than 90 days. Plant Operator daily rounds include inspection of waste containment areas to ensure that waste containers were not damaged or leaking. Weekly inspections of the hazardous material and hazardous waste storage areas, and monthly inspections of oil and chemical tanks were also conducted.

Generator Status

The generator status for the facility was Small Quantity Generator (SQG) for RCRA and non-RCRA hazardous wastes throughout 2023. However, the facility continues to manage its waste as Large Quantity Generator (LQG).

Training

Operations personnel received training in environmental compliance (including Worker Environmental Awareness Training) and hazardous waste management (including annual 8-hr refresher of the 24-hr technician-level HAZWOPER) in 2023. Documentation of the training is maintained in the plant personnel office.

WASTE-5

For SQGs, the Code of Federal Regulation (40 CFR §262) and California Code of Regulations (22 CCR §66262) both allow for up to 180-days of on-site storage of hazardous waste if the quantity of on-site waste never exceeds 6,000 kg (13,200 lb). For LQGs, regulations allow up to 90-days of on-site storage. During the reporting year, the facility did not have any hazardous waste accumulating on-site for more than 90-days.

VIS-1

No structural treatment maintenance occurred in 2023.

VIS-3

No lighting complaints were received by the facility in 2023.

ATTACHMENT A

COMPLIANCE MATRIX

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Air Quality	AQ-1	No air contaminant shall be released into the atmosphere which causes a public nuisance.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-3	Lube oil vent mist eliminators opacity limit.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-4	The gas turbine engine shall be equipped with continuously recording fuel gas flowmeter.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Included information in the quarterly reports of condition AQ-28.
Air Quality	AQ-5	Install CEM's for NOx, CO and O2 on each gas turbine exhaust, and a CEMS for NOx or NH3 upstream of the SCR. CEMS shall meet requirements of 40 CFR Parts 60 and 75, as applicable.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-6	Exhaust stack provisions for stack gas sampling.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-7	Natural gas quality specifications *and modification to allow use of propane during startup.*	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Refer to Condition AQ-27.
Air Quality	AQ-8	Startup/Shutdown definition and duration limits *and as modified to allow for reduction in load to engage the steam turbine.*	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Refer to Condition AQ-28.
Air Quality	AQ-9	Ammonia injection and catalyst monitoring *and as modified to allow injection at temperatures as low as 302 degrees F*	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Record the SCR temperatures and the commencement of ammonia injection times in the daily logs required under Condition AQ-28.
Air Quality	AQ-10	Turbine startup CO and NOx mass emission limits *and as modified to increase hourly NOx limit.*	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Provide records of the emissions as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-11	Turbine startup CO and NOx concentration limits.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Provide records of the emissions as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-12	Turbine operational emission limits *and as modified to reduce hourly PM emission limit to 11.0 lb.*	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Provide records of the emissions as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-13	Daily turbine emission limits including startup\shutdown *and as modified to reduce daily PM emission limit to 264.0 lb.*	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Provide records of the emissions as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-14	Twelve month rolling average emission limits *and as modified to reduce annual PM emission limit to 96,360 lb.*	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Provide records of the emissions as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-19	Annual source test to demonstrate compliance with the short-term emission limits (lb/hr and ppmv @ 15% O2), including NOx, CO, VOC, PM10 and Ammonia.	GT1: 8/12/23 GT2: 8/14/23 GT3: 8/19/23 GT4: 8/21/23 (+/- 30-days of the due date)	GT1: 8/15/23 GT2: 8/09/23 GT3: 8/01/23 GT4: 11/02/23	Compliant	Refer to Condition AQ-22. Unit 4 was put in dormant state on August 30, 2023, as Boiler Feedwater Pump was still in the shop for repairs. Unit 4 was taken out of dormant state on September 8, 2023. This changed the Source test due date for Unit 4 from 8/21/23 to 11/7/23.
Air Quality	AQ-20	Cold start NOx and CO mass emission limit compliance demonstration shall be performed on one of the gas turbine engines every 7-years.	11/14/23 (+/- 30-days of the due date)	GT4: 11/29/23	Compliant	Refer to Condition AQ-22
Air Quality	AQ-21	Compliance with natural gas sulfur content limit shall be demonstrated periodically as required by 40 CFR 60 Subpart GG and 40 CFR 75.	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Conduct quarterly gas sampling and analysis and provide results with the quarterly report required by AQ-28.

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Air Quality	AQ-22	Source test notifications and submittals.	Varies depending on the scheduled test date.	Test Date Notification: 5/10/23 Test Plan Submittal: 7/18/23 Test Report Submittal: 10/13/23 for Units 1, 2, and 3 and 12/21/23 for Unit 4	Compliant	Notify the CPM and the District 30 days prior to any compliance source test. Provide a source test plan to the CPM and the District for the CPM and District approval 15 days prior to testing. The results and field data collected by the source tests shall be submitted to the CPM and the District within 60 days of testing.
Air Quality	AQ-23	CO/VOC surrogate relationship compliance demonstration modified by District to require VOC verification through annual source test due to lack of CO/VOC correlation.	Varies depending on the scheduled test date.	7/18/2023	Compliant	Provide a source test plan to the CPM and District for CPM and District approval 15 days prior to testing.
Air Quality	AQ-24	Specifies source test methods for stack testing and fuel sulfur content and a requirement to identify methods in the test plan submitted under Condition AQ-22.	Refer to AQ-22	Refer to AQ-22	Compliant	Identify the test methods to be used in the annual compliance source testing as part of the test plan to be submitted under Condition AQ-22.
Air Quality	AQ-26	Maintain records of hourly, daily, and twelve-monthly rolling average emissions data for NOx, CO, NH3 and VOC (VOC/CO surrogate).	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Compile the required data and submit the quarterly reports to the CPM within 30 days of the end of the quarter.
Air Quality	AQ-27	Maintain records of hourly, daily, and twelve-monthly rolling average emissions data for SOx, based on fuel use and natural gas sulfur content.	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Provide records of the information described as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-28	Quarterly report formatting and data requirements.	60 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Compile required data and submit the information to the CPM in quarterly reports to be submitted no later than 60 days after the end of each calendar quarter.
Air Quality	AQ-29	Maintain records required by the permit for a period of 5 years.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-30	Reduction of CEM's data.	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Compile the required data in the formats discussed and submit the results to the CPM quarterly.
Air Quality	AQ-31	Breakdown Initial Notification: Notify the District of any breakdown conditions no later than one (1) hour after detection).	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Comply with the notification requirements of the District and submit written copies of these notification reports to the CPM as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-32	Breakdown Follow-Up Report: Notify the District in writing within ten (10) days following the correction of any breakdown condition, indicating the cause, excess emission and corrective actions.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Comply with the notification requirements of the District and submit written copies of these notification reports to the CPM as part of the quarterly reports of Condition AQ-28.
Air Quality	AQ-33	Quarterly CEM's audits.	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Submit the continuous emission monitor audit results with the quarterly reports required of Condition AQ-35.
Air Quality	AQ-34	Requirements for testing and maintenance of CEM's.	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Submit the continuous emission monitor results with the quarterly reports of Condition AQ-35.

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Air Quality	AQ-35	Requirements preparing and submitting Quarterly CEMS Reports to the Air District and CEC.	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Compile the required data and submit the quarterly reports to the CPM and the APCO within 30 days of the end of the quarter.
The following conditions (AQ-37 through AQ-40) apply to permit units S-3412-1, 2, 3 and 4 for those permit units that use Selective Catalytic Reduction:						
Air Quality	AQ-37	Ammonia injection system monitoring requirements.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-39	Pollution control device temperature monitoring requirements.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Compile the required temperature data and maintain the data for a period of five years. Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-40	Ammonia slip compliance calculation and annual update to the correction factor after source testing.	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Refer to the requirements of Condition AQ-26. If the project owner chooses to use a NH3 CEM, submit a monitoring plan to the District for review and approval at least 60 days prior to its use.
The following conditions (AQ-47 through AQ-53) shall apply to permit units S-3412-5 and S3412-6: Cooling Tower with 10 Cells and High Efficiency Drift Eliminator						
Air Quality	AQ-47	No air contaminant shall be released into the atmosphere which causes a public nuisance.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-49	No hexavalent chromium compounds shall be added to the cooling tower.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-51	PM10 emission limit for cooling towers.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Refer to Condition AQ-52.
Air Quality	AQ-52	PM10 emission rate calculation to demonstrate compliance with the PM10 emission limit.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Compile the required daily PM10 emissions data and maintain the data for a period of five years. Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-53	Compliance determination for PM10 emission limit *and as modified to provide for quarterly TDS monitoring*.	By the end of each calendar quarter.	N/A	Compliant	Compile the required daily PM10 emissions data and maintain the data for a period of five years. Make the site available for inspection by representatives of the District, CARB, and the CEC.
The following conditions (Conditions AQ-54 through AQ-61) shall apply to the following permit units: IC Engines (S3412-7, 9, 10 and 11)						
Air Quality	AQ-54	No air contaminant shall be released into the atmosphere which causes a public nuisance.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-56	Opacity limits for IC engines.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-57	PCV requirements for IC engines.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-58	Diesel sulfur content limitations.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Refer to Condition AQ-61.
Air Quality	AQ-59	Particulate matter emission limits for IC engines (0.1 grains/dscf).	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Make the site available for inspection by representatives of the District, CARB, and the CEC.
Air Quality	AQ-60	Operational limitation of 200 hours per year for IC engines, *modified to 100 hours for fire water pump & 20 hours for emergency generators to comply with revised District regulations.*	30 days from end of each calendar quarter	Q1 Submitted 04/26/23 Q2 Submitted 07/27/23 Q3 Submitted 10/27/23 Q4 Submitted 01/25/24	Compliant	Compile records of hours of operation of any of the IC engines and include those records as part of the quarterly reports submitted to the CPM under Condition AQ-28.

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Air Quality	AQ-61	Record keeping requirement for hours of operation and diesel sulfur content for IC engines.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Compile records of hours of operation of the IC engines and of the diesel fuel purchased that includes the sulfur content and maintain the data for a period of five years. Make the site available for inspection by representatives of the District, CARB, and the CEC.
The following conditions (Conditions AQ-62 through AQ-78) shall apply to the following permit units: Boiler (S-3412-12)						
Air Quality	AQ-62	Emissions rates shall not exceed any of the following: PM10: 0.007 lb/MMBtu NOx (as NO2): 12 ppmv @ 3% O2 VOC: 30 ppmv @ 3% O2 CO: 50 ppmv @ 3% O2	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall provide records of the emissions as part of the quarterly reports specified in Condition AQ-28.
Air Quality	AQ-63	Boiler shall be fired exclusively on natural gas, consisting primarily of methane and ethane, with a sulfur content no greater than 0.75 grains of sulfur compounds (as S) per 100 dry scf of natural gas.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			Refer to Condition AQ-64.
Air Quality	AQ-64	Compliance with natural gas sulfur content limit shall be demonstrated within 90 days of startup and during required NOx and CO compliance source testing for the boiler thereafter.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall provide records to the CPM and the District of the natural gal sulfur content within 90 days of startup and submitted with the source test results within sixty (60) days of those tests.
Air Quality	AQ-65	Compliance source testing for NOx and CO shall be conducted within 90 days of initial start-up and not less than once every 12 months, except as provided in AQ-66.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall notify the CPM and the District thirty (30) days prior to any compliance source test. The project owner shall provide a source test plan to the CPM and District for CPM and District approval fifteen (15) days prior to testing. The results and field data collected by the source tests shall be submitted to the CPM and the District within sixty (60) days of testing.
Air Quality	AQ-66	Source testing to demonstrate compliance with NOx and CO emissions limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall notify the CPM and the District thirty (30) days prior to any compliance source test. The project owner shall provide a source test plan to the CPM and District for CPM and District approval fifteen (15) days prior to testing. The results and field data collected by the source tests shall be submitted to the CPM and the District within sixty (60) days of testing.
Air Quality	AQ-67	If the project owner fails any compliance demonstration for NOx or CO emission limits when testing not less than once every 36 months, compliance with NOx and CO emission limits shall be demonstrated not less than once every 12 months.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall notify the CPM and the District thirty (30) days prior to any compliance source test. The project owner shall provide a source test plan to the CPM and District for CPM and District approval fifteen (15) days prior to testing. The results and field data collected by the source tests shall be submitted to the CPM and the District within sixty (60) days of testing.
Air Quality	AQ-68	Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the Commission.

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Air Quality	AQ-69	(a) Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified thirty (30) days prior to any compliance source test, and a source test plan must be submitted for approval fifteen (15) days prior to testing. (b) The results of each source test shall be submitted to the District within sixty (60) days thereafter. (c) Compliance source testing shall be conducted under conditions representative of normal operation.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall notify the CPM and the District thirty (30) days prior to any compliance source test. The project owner shall provide a source test plan to the CPM and District for CPM and District approval fifteen (15) days prior to testing. The results and field data collected by the source tests shall be submitted to the CPM and the District within sixty (60) days of testing.
Air Quality	AQ-70	The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100 NOx (lb/MMBtu) EPA Method 10 CO (ppmv) EPA Method 10 or ARB Method 100 Stack Gas Oxygen EPA Method 3 or 3A or ARB Method 100 Fuel Gas Sulfur Content ASTM D3246 or double GC for H2S and mercaptans.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			As part of the test plan to be submitted under Condition AQ-65, the project owner shall identify the test methods to be used in the annual compliance source testing.
Air Quality	AQ-71	The stack concentration of NOx (as NO2), CO, and O2 shall be measured at least on a monthly basis using District approved portable analyzers.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall provide monthly records of stack concentrations of NOx (as NO2), CO, and O2 as part of the quarterly reports specified in Condition AQ-28.
Air Quality	AQ-72	The project owner shall maintain records of the date and time of NOx, CO, and O2 measurements, the measured NO2 and CO concentrations corrected to 3% O2 and the O2 concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for the period of no less than two years and shall be made readily available for District inspection upon request.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the Commission.
Air Quality	AQ-73	If the NOx or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the project owner or third party shall notify the District and return the NOx and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after one (1) hour, the project owner shall conduct a source test within 60 days of the first exceedance to demonstrate compliance with the permitted emissions limits.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall notify the District as per the requirement of this condition. If a source test is required, that test shall occur within sixty (60) days of the first exceedance with the results of that test to be submitted to the COM and the District within sixty (60) days of testing.
Air Quality	AQ-74	Records shall be retained at the facility for a period of no less than five (5) years and shall be made available for District inspection upon request.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the Commission.

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Air Quality	AQ-75	The project owner shall obtain APCO approval for the use of any equivalent low-NOx burner not specifically approved by these Conditions of Certification prior to installation. Approval of any equivalent low-NOx burner shall be made by the APCO's determination that the submitted design and performance data for the alternate burner are equivalent to an approved burner.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner's request for approval of an equivalent low-NOx burner shall be submitted to the District at least ninety (90) days prior to the planned installation date.
Air Quality	AQ-76	The project owner's request for approval of an equivalent low-NOx burner shall include at a minimum the following information: burner manufacturer and model number, maximum heat input rating, manufacturer's performance and design specifications, manufacturer's burner drawings, and description of low-NOx operation.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner's request for approval of an equivalent low-NOx burner under Condition AQ- 75 shall include at a minimum the information described above.
Air Quality	AQ-77	The project owner's request for approval of an equivalent low-NOx burner shall be submitted to the District at least ninety (90) days prior to the planned installation date. The project owner shall also notify the District at least thirty (30) days prior to the actual installation of the District approved equivalent low-NOx burner.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall comply with the deadline requirements for submittal of information (90 days prior to installation) and notification (at least 30 days prior to installation) described in this Condition.
Air Quality	AQ-78	Boiler natural gas consumption shall not exceed 148.8 MMBtu/day.	Clayton Boiler has been designated as Dormant Emissions Unit (DEU) per SJVAPCD permit # S-3412-13-4 as of March 2, 2019. No verification is needed if the unit is DEU.			The project owner shall notify the CPM of any proposed changes in the PM10 emission limits, indicate which ERC certificates are to be retired and if necessary submit a Request to Amend conditions AQ-12 through AQ-15 within 60 days after the last unit is initially source tested.
Air Quality	AQ-EG1	No air contaminant shall be released into the atmosphere which causes a public nuisance.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Air Quality	AQ-EG2	Opacity limits for the engine (dark as, or darker than, Ringelmann 1 or 20% opacity).	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Air Quality	AQ-EG3	IC Engine emission limit Particulate Matter.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Air Quality	AQ-EG4	The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Air Quality	AQ-EG5	This engine shall be equipped with a non-resettable hour meter.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Air Quality	AQ-EG6	Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Air Quality	AQ-EG7	IC Engine emission limits for NOx, CO and VOC.	Equipment was not installed and operational during 2023.			A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation reports specified in Condition AQ-28.
Air Quality	AQ-EG8	IC Engine emission limit for PM10.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Air Quality	AQ-EG9	Requirements to operate and maintain the IC Engine in proper operating condition as recommended by the engine manufacturer or emissions control system supplier.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Air Quality	AQ-EG10	Requirements to monitor the operational characteristics of the IC Engine as recommended by the manufacturer or emission control system supplier during periods of operation.	Equipment was not installed and operational during 2023.			The project owner shall submit to the District and Compliance Program Manager (CPM) at CEC engine operation procedures and data demonstrating compliance with this condition as part of the quarterly operation reports specified in Condition AQ-28.
Air Quality	AQ-EG12	This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract.	Equipment was not installed and operational during 2023.			The project owner shall submit to the District and CPM at CEC engine operation procedures and data demonstrating compliance with this condition as part of the quarterly operation reports specified in Condition AQ28.
Air Quality	AQ-EG13	Monthly records of emergency and non-emergency operations.	Equipment was not installed and operational during 2023.			A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation reports specified in Condition AQ-28.
Air Quality	AQ-EG14	Operating hour limit for purposes of testing and maintenance of the IC Engine and emergency situations.	Equipment was not installed and operational during 2023.			A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation reports specified in Condition AQ-28.
Air Quality	AQ-EG15	Recordkeeping requirements for fuel purchases.	Equipment was not installed and operational during 2023.			The project owner shall maintain a fuel purchase and consumption log on site for inspection by the District, CARB, and the CEC.
Air Quality	AQ-EG16	Record retention requirements.	Equipment was not installed and operational during 2023.			The project owner shall make the site available for inspection by representatives of the District, CARB, and the CEC upon request.
Biological Resources	BIO-3	Designated Biologist will advise the project owner's supervising construction or operations engineer on the implementation of the biological resources Conditions of Certification; supervise or conduct mitigation, monitoring, and other biological resources compliance efforts, particularly in areas requiring avoidance or containing sensitive biological resources, such as wetlands and special status species; and notify the project owner and the CPM of any non-compliance with any biological resources Condition of Certification.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	During project operation, the Designated Biologist shall submit record summaries in the Annual Compliance Report. See Attachment H.
Biological Resources	BIO-5	Develop and implement a Worker Environmental Awareness Program	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Provide employees and contractors with Worker Environmental Awareness Training.
Biological Resources	BIO-9	Submit to the CPM a copy of the final BRMIMP and implement measures identified in the plan.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Provide the CPM with the final version of the BRMIMP, the CPM will determine the plans acceptability within 15 days of receipt of the final plan. Notify the CPM five working days before changing the BRMIMP. Summarize compliance within 30 days after completion of project construction.
Biological Resources	BIO-11	Incorporate into the permanent closure plans measures that address the local biological resources. The biological resource facility closure measures will also be incorporated into the La Paloma BRMIMP.	TBD	Ongoing or Event-triggered Requirement	Compliant	Address all biological resource-related issues associated with facility closure in a Biological Resources Element. The Biological Resources Element will be incorporated into the Facility Closure Plan.
Facility Design	GEN-9	The project owner shall file a closure/decommissioning plan with the CPM and Kern County for review and approval at least 12 months (or other mutually agreed to time) prior to commencing the closure activities.	TBD	Ongoing or Event-triggered Requirement	Compliant	At least 12 months prior to closure or decommissioning activities, file a copy of the closure/decommissioning plan with Kern County and the CPM for review and approval.
Hazardous Materials Management	HAZ-1	No non-CPM-approved hazardous materials.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	The project owner shall provide in the Annual Compliance Report a list of hazardous materials used at the facility in reportable quantities.

LA PALOMA COMPLIANCE MATRIX

2023 ANNUAL COMPLIANCE REPORT (As of 12/31/23)

Category	Condition #	Requirement (Verification or Submittal)	Due Date	Date Submitted	Compliance Status	Verification
Noise	NOISE-2	Document, investigate, evaluate, and attempt to resolve all project related noise complaints.	Ongoing Requirement	Ongoing or Event-triggered Requirement	Compliant	Within 30 days of receiving a noise complaint, file a copy of the Noise Complaint Resolution Form with Kern County and the CPM documenting the resolution of the noise 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.
Soil & Water Resources	SOIL&WATER-4	Notify the CPM of certification of the wastewater disposal methodology that will be used by the facility. Provide a copy of the approved final Underground Injection Control Permit or a description and schematic of the zero-discharge system. And as revised to allow use of both zero discharge and injection.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	Within 60 days of certification, submit a description of the selected wastewater disposal methodology to the CPM. Provide status reports on injection well and ZD system with annual report.
Transmission Line Safety & Nuisance	TLSN-2	Identify and correct all complaints of interference with radio or television signals from operation of the line and related facilities.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	All reports of the line-related complaints shall be summarized and included in the Annual Compliance Report to the CPM.
Transmission Line Safety & Nuisance	TLSN-4	Ensure that the transmission line right-of-way is kept free of combustible materials.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	The project owner shall provide a summary of inspection results and any fire prevention activities along the right-of-way in the annual compliance report
Visual Resources	VIS-1	Treat all project structures and transmission lines identified in the treatment plan in non-reflective colors to blend with the agricultural setting.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	Not later than 60 days prior to ordering any structures that are to be color treated during manufacture, submit the proposed plan to the CPM. Not less than 30 days prior to first electricity generation, the project owner shall notify the CPM that all structures treated during manufacture and all structures treated in the field are ready for inspection. Provide annual maintenance update in annual report.
Visual Resources	VIS-3	Design and install all lighting such that light bulbs and reflectors are not visible from public viewing areas and illumination of the vicinity and the nighttime sky is minimized.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	At least 60 days before ordering the exterior lighting, provide the lighting plan to the CPM. Describe any complaints about lighting and resolution in annual report.
Waste Management	ASTE-1	Submit a Waste Management Plan for all wastes generated during construction and operation of the project.	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	At least 90 days prior to start of rough grading; submit a Waste Management Plan to the CPM. Summarize plan vs actual waste management activities in Annual Report
Waste Management	WASTE-3	Notify the CPM of any waste management-related enforcement action that has either been taken or is known to be pending against it or against any waste hauler or treatment, storage, or disposal facility with which its contracts.	Ongoing Requirement	Ongoing or Event-Triggered Requirement	Compliant	The project owner shall notify the CPM in writing within 10 working days of becoming aware of any such enforcement action.
Waste Management	WASTE-5	No hazardous waste will be stored on site longer than 90 days unless dictated by law, ordinances, regulations or standards (LORS).	Submit Update Within Annual Compliance Report	Information Provided Herein This Report	Compliant	The project owner shall indicate in the Annual Compliance Report which hazardous wastes are stored on the site longer than 90 days, and which LORS pertain.

ATTACHMENT B

POST-CERTIFICATION CHANGES

Cumulative List of Post-Certification Changes

Energy Commission Approved Changes to Conditions of Certification As of: 12/31/23

Change No.	Condition	Approved Condition Summary Description	Approval Date
1	GEO-1, TLSN-3, SAFETY-1, TRANS-5, AQ-C1, 2, 15, 16, 17 & 18	Clarification on Definition of Start of Construction	10/31/99
2	BIO-10	Change in Condition Compliance Date of Completion of Land Transactions	11/30/99
3	NA	La Paloma Ownership Transfer	1/26/00
4	NA	Modifications of Alignment of Transmission and Water Lines	2/4/00
5	NA	Change in Number of Cells per Cooling Tower	2/4/00
6	NA	Plant Site Modifications	2/18/00
7	AQ-2, 12, 13, 14, 15, 41, 42, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76 &77	Proposed Project Modifications to add a Natural-gas-fired Boiler to the Zero Discharge Wastewater System and to Implement the Capability of the Gas Turbines to Operate in a Steam Injection Power Augmentation Mode.	3/22/00
8	SOIL & WATER-4	Change in Verification Timing to Allow for Combination of 2 Wastewater Disposal Technologies to be Used	8/1/00
9	AQ-5 &78	Petition to Correct Condition AQ-5 and to Change the Vendor of the Zero Discharge Boiler	1/10/01
10	NA	Temporary Expansion of Construction Parking/Laydown Areas (until 4/30/02)	7/9/01
11	TSE-4	Integration of New Generating Units with Cal-ISO	8/9/01
12	TLSN-3	Condition Verification Change of Timing for Post-Project EMF Measurements	11/6/01
13	AQ-15, 79 &80	Modification to AQ Conditions to allow for changes to PM10 Emission Limits Based on Source Test Results, and Energy Commission Approval of Excess Emissions During Commissioning	3/5/02
14	AQ-7	Modification to condition to allow for the use of propane during turbine startup ignition	9/25/02
15	AQ-12, AQ-13, AQ-14	Reduction of PM10 emission limits	4/30/03
16	AQ-8, AQ-9, AQ-10, AQ-52, AQ-53	Clarify startup, shutdown, SCR ammonia injection temperature, increase one-hour NOx limit, specify cooling tower drift calculation factor, reduce frequency of cooling tower sampling, & and revise the description of emergency diesel engines	10/6/04

Cumulative List of Post-Certification Changes

Energy Commission Approved Changes to Conditions of Certification As of: 12/31/23

Change No.	Condition	Approved Condition Summary Description	Approval Date
17	NA	Change of equity ownership	11/3/04
18	NA	Change of equity ownership	7/13/05
19	SOIL&WATER-4	Allow use of ZLD or injection for wastewater disposal.	8/1/08
20	NA	Change of equity ownership	4/12/10
21	AQ-51	Cooling tower PM10 emission limit of 20 lb/day	8/11/10
22	NA	Allow use of foggers for turbine inlet air cooling	5/28/13
23	SOIL&WATER-3	SWPPP Notice of Termination granted by CVRWQB on 8/12/15, effective 7/10/15. CEC agreement 8/26/15.	8/12/15
24	NA	Change of Ownership 12/4/17. Ownership name changed to CXA La Paloma, LLC.	12/4/17
25	Added Conditions AQ-EG1 through AQ-EG16	Install an emergency standby electrical generator to power water pumps at the existing West Kern Water District pump station in the event of electrical grid power loss.	5/11/22
26	NA	Change of Ownership 2/9/24. CXA La Paloma, LLC, was bought by Capital Power Investments LLC	2/9/24

ATTACHMENT C

GOVERNMENTAL AGENCY FILINGS

Government Agency Filings

Calendar Year 2023

Date	To	From	SUBJECT
12/20/2022	SJVAPCD	CXA La Paloma	Annual Title V Permit Fees for 2023
1/12/2023	OSHA Website	CXA La Paloma	OSHA Form 300 A Log of work-Related Injuries and Illnesses on-line submittal
1/24/2023	EPA (ECMPS)	CXA La Paloma	EDR Submittal – 4Q22
1/24/2023	SJVAPCD	CXA La Paloma	Title V Deviation Report for Unit 4 Missed CGA tests for the 4th Quarter of 2022
1/27/2023	SJVAPCD	CXA La Paloma	Annual Fuel Sulfur Content Monitoring
1/27/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of December 2022
1/30/2023	CXA La Paloma	SJVAPCD	2023 Emissions Inventory update notification
2/6/2023	CXA La Paloma	SJVAPCD	Unit 2 CEMS Deviation/Breakdown Report for 1/31/23 Breakdown of Stack NOx Analyzer.
2/12/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of January 2023
2/14/2023	CARB	CXA La Paloma	Annual EROAR submittal on CARB's DOORS website
2/22/2023	BOE	CXA La Paloma	Hazardous Waste Generator Fee Return
2/24/2023	BOE	CXA La Paloma	BOE 517 Report
2/27/2023	Kern County	CXA La Paloma	La Paloma Hazardous Materials Business Plan
2/28/2023	CXA La Paloma	SJVAPCD	NOV # 5030626 issued for the reported 12/21/22 deviation for Unit 4
3/1/2023	SJVAPCD	CXA La Paloma	Variance Petition for Performance Test on Unit 1 submitted to the District.
3/7/2023	SJVAPCD	CXA La Paloma	Response to NOV # 5030626 sent to the District.
3/8/2023	CXA La Paloma	SJVAPCD	NOV # 5030686 issued for the failure to submit Emissions Control Plan by May 1, 2022, as required by updated District Rule 4320
3/9/2023	EPA	CXA La Paloma	Acid Rain Program Annual SO2 Allowances Deduction
3/14/2023	SJVAPCD	CXA La Paloma	Response to NOV # 5030686 sent to the District.
3/20/2023	DOE	CXA La Paloma	Supplemental Form 923 Power Plant Report 2022
3/20/2023	DOE	CXA La Paloma	Annual Electric Generator Report Form EIA-860 2022
3/27/2023	CXA La Paloma	EPA	Approval Letter for WD3 Annual MIT/FOT Test Procedure
3/28/2023	SJVAPCD	CXA La Paloma	Emissions Inventory Statement 2022

Government Agency Filings

Calendar Year 2023

Date	To	From	SUBJECT
3/29/2023	SJVAPCD	CXA La Paloma	Unit 1 CEMS Deviation/Breakdown Report for 3/20/23 Breakdown of Stack O2 Analyzer
3/31/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of February 2023
4/3/2023	CXA La Paloma	SJVAPCD	Acceptance Letter for the breakdown submitted for January 31, 2023, Unit 2 Stack NOx Analyzer.
4/6/2023	SJVAPCD	CXA La Paloma	Unit 1 CEMS Deviation/Breakdown Report for 3/30/23 Breakdown of Stack O2 Analyzer
4/10/2023	CXA La Paloma	SJVAPCD	Settlement Case # S23-0243 for NOV # 5030626
4/12/2023	CXA La Paloma	SJVAPCD	District granted variance for the Performance test on Unit 1.
4/19/2023	SJVAPCD	CXA La Paloma	Acceptance of Settlement Case # S23-0243 for NOV # 5030926
4/21/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of March 2023
4/21/2023	SJVAPCD	CXA La Paloma	Title V Deviation for the Performance Test notification for Unit 1 being made less than 30 days from actual test during the Performance Test variance.
4/26/2023	EPA (ECMPS)	CXA La Paloma	EDR Submittal – 1Q23
4/28/2023	FERC	CXA La Paloma	Annual Electric Generator Report Form FERC-552 2022
5/1/2023	CXA La Paloma	KCEHS	HMBP inspection report for Hazardous Materials Business Plan inspection done on April 3, 2023.
5/1/2023	KCEHS	CXA La Paloma	Signed copy of HMBP report sent to KCEHS on May 1, 2023.
5/9/2023	SJVAPCD	CXA La Paloma	Unit 1 Performance Test Variance Summary report
5/29/2023	CARB	CXA La Paloma	Cal e-GGRT SF6 Report for 2022
5/31/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of April 2023
6/15/2023	CXA La Paloma	SJVAPCD	Settlement Case # S23-0243 for NOV # 5030626
6/21/2023	SJVAPCD	CXA La Paloma	Acceptance of Settlement Case # S23-0243 for NOV # 5030926
7/10/2023	SJVAPCD	CXA La Paloma	Unit 2 CEMS Deviation/Breakdown Report for 6/30/23 Breakdown of GTMC NOx Analyzer
7/10/2023	SJVAPCD	CXA La Paloma	Unit 2 CEMS Deviation/Breakdown Report for 7/1/23 Breakdown of Stack NOx Analyzer

Government Agency Filings

Calendar Year 2023

Date	To	From	SUBJECT
7/11/2023	SJVAPCD	CXA La Paloma	Unit 1 CEMS Deviation/Breakdown Report for 7/3/23 Breakdown of GTMC NOx Analyzer
7/18/2023	KCEHS	CXA La Paloma	Annual Haz Waste/Materials Fees
7/21/2023	EPA (ECMPS)	CXA La Paloma	EDR Submittal – 2Q23
7/27/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of June 2023
8/15/2023	SJVAPCD	CXA La Paloma	Filed ATC application for Dormant Emissions Unit (DEU) for all four Units
8/24/2023	CXA La Paloma	SJVAPCD	SJVAPCD issued ATCs for DEU status for all four Units
8/31/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of July 2023
9/29/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of August 2023
10/9/2023	CXA La Paloma	SJVAPCD	Record of Corrective Action Taken notification for the Title V Deviation for the deviation submitted during the Performance Test variance for Unit 1.
10/25/2023	EPA (ECMPS)	CXA La Paloma	EDR Submittal – 3 Q23
10/25/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of September 2023
11/2/2023	SJVAPCD	CXA La Paloma	Unit 4 CEMS Deviation Report for 10/9/23 Deviation for missing performance test as per District policy for like and kind replacement of Stack NOx analyzer.
11/17/2023	SJVAPCD	CXA La Paloma	Unit 1 CEMS Deviation/Breakdown Report for 11/9/23 Breakdown of Stack NOx Analyzer
11/28/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of January 2023
12/19/2023	CXA La Paloma	SJVAPCD	Acceptance Letter for the breakdown submitted for March 20, 2023, Unit 1 Stack O2 Analyzer.
12/19/2023	CXA La Paloma	SJVAPCD	Acceptance Letter for the breakdown submitted for March 30, 2023, Unit 1 Stack O2 Analyzer.
12/19/2023	CXA La Paloma	SJVAPCD	Acceptance Letter for the breakdown submitted for June 30, 2023, Unit 2 GTMC NOx Analyzer.

Government Agency Filings

Calendar Year 2023

Date	To	From	SUBJECT
12/19/2023	CXA La Paloma	SJVAPCD	Acceptance Letter for the breakdown submitted for July 1, 2023, Unit 2 Stack NOx Analyzer
12/19/2023	CXA La Paloma	SJVAPCD	Acceptance Letter for the breakdown submitted for July 1, 2023, Unit 1 GTMC NOx Analyzer
12/22/2023	DOE	CXA La Paloma	Form EIA-923 Power Plant Report for the month of January 2023
12/28/2023	CXA La Paloma	SJVAPCD	Unit 1 CEMS Deviation/Breakdown Report for 12/20/23 Breakdown of Stack NOx Analyzer
Not Required	FERC	CXA La Paloma	

ATTACHMENT D

PROJECT COMPLIANCE ACTIVITIES FOR 2024

Project Compliance Activities Scheduled for 2024

1. AQ-21 & AQ-64, conduct quarterly gas analysis.
2. AQ-22, conduct annual source testing and RATA for Units 1-4 and submit results.
3. AQ-26, submit quarterly reports.
4. AQ-28, submit quarterly reports.
5. AQ-30, submit quarterly reports.
6. AQ-33, conduct quarterly CEMS audits for Units 1-4 and submit reports with quarterly compliance reports.
7. AQ-35, submit quarterly reports.
8. AQ-53, conduct quarterly cooling water analysis.
9. BIO-3, Designated Biologist to prepare annual biology report and include in the Annual Compliance Report.
10. TLSN-4, conduct transmission line inspections.
11. Conduct weekly hazardous waste/hazardous materials area inspections.
12. Conduct monthly, quarterly, and annual SPCC oil tank inspections.
13. Submit quarterly CEMS EDR.
14. Submit Title V Semiannual Deviation Reports.
15. Submit Energy Commission Annual Compliance Report.
16. Submit annual Title V Certification Report.
17. Submit annual Hazardous Materials Business Plan Update.
18. Conduct annual UIC well Fall Off Test and Mechanical Integrity Test.
19. Submit quarterly and annual UIC well reports.
20. Submit annual Acid Rain Program SO2 allowances.
21. Review SPCC Plan and update as needed.
22. Investigate feasibility of upgrading the existing MEE Fog system to new system for each Unit with projected increase in generation capacity of 12 MWs per Unit.

ATTACHMENT E

ADDITIONS TO ON-SITE COMPLIANCE FILE

Addition To On-Site Compliance Files

Calendar Year 2023

Date	To	From	SUBJECT
1/27/2023	EPA	CXA La Paloma	UIC Permit Quarterly Report - 4Q22
1/27/2023	USFWS/BLM/CDFW	CXA La Paloma	Designated Biologist's Annual Report
1/27/2023	CEC	CXA La Paloma	Air Quality (AQ) Quarterly Report - 4Q22
1/27/2023	SJVAPCD	CXA La Paloma	Quarterly CEMS Report - 4Q22
2/3/2023	EPA	CXA La Paloma	UIC WD-3 Sand Clean-out and Acidization Plan
2/8/2023	EPA	CXA La Paloma	UIC WD-3 Annual MIT/FOT Test Procedure
2/13/2023	CEC	CXA La Paloma	Form 1304, 4Q21 Declaration
2/15/2023	CXA La Paloma	EPA	UIC WD-3 Sand Clean-out and Acidization Plan Approval
2/24/2023	SJVAPCD	CXA La Paloma	Title V Semi-Annual Report Required Monitoring & Certification August 1, 2022 - January 30, 2023
2/24/2023	SJVAPCD	CXA La Paloma	Title V Permit - Annual Compliance Certification Report
2/27/2023	CEC	CXA La Paloma	La Paloma Generating Plant Annual Compliance Report 2022
4/11/2023	EPA	CXA La Paloma	UIC WD-3 Sand Cleanout and Acidization Report
4/24/2023	CEC	CXA La Paloma	Form 1304, 1Q23 Declaration
4/26/2023	CEC	CXA La Paloma	Air Quality (AQ) Quarterly Report - 1Q23
4/26/2023	EPA	CXA La Paloma	UIC Permit Quarterly Report - 1Q23
4/26/2023	SJVAPCD	CXA La Paloma	Quarterly CEMS Report - 1Q23
5/10/2023	SJVAPCD	CXA La Paloma	30-Day Notice of Annual Compliance Source Test
6/1/2023	CXA La Paloma	CEC	CEC fiscal year 23/24 fee notice
6/29/2023	CEC	CXA La Paloma	CEC fiscal year 23/24 fee payment
7/18/2023	SJVAPCD	CXA La Paloma	Submittal of Test plans for 2023 Annual Compliance Source Test/RATA
7/27/2023	EPA	CXA La Paloma	UIC Permit Quarterly Report - 2Q23
7/27/2023	CEC	CXA La Paloma	Air Quality (AQ) Quarterly Report - 2Q23

Addition To On-Site Compliance Files

Calendar Year 2023

Date	To	From	SUBJECT
7/27/2023	SJVAPCD	CXA La Paloma	Quarterly CEMS Report - 2Q23
8/14/2023	EPA	CXA La Paloma	2023 Annual MIT/FOT Report Submittal
8/14/2023	CEC	CXA La Paloma	Form 1304, 2Q23 Declaration
8/25/2023	SJVAPCD	CXA La Paloma	Title V Semi-Annual Report of Required Monitoring & Certification February 1 - July 31, 2023
10/2/2023	SJVAPCD	CXA La Paloma	Submit 7-Year Cold Start Test notification to the District
10/12/2023	SJVAPCD	CXA La Paloma	Submit 7-Year Cold Start Test Plan to the District
10/13/2023	SJVAPCD	CXA La Paloma	Submit Annual Source Test Report to District - Unit 1
10/13/2023	SJVAPCD	CXA La Paloma	Submit Annual Source Test Report to District - Unit 2
10/13/2023	SJVAPCD	CXA La Paloma	Submit Annual Source Test Report to District - Unit 3
10/16/2023	EPA	CXA La Paloma	UIC Permit Quarterly Report for WD-3 - 3Q22
10/26/2023	CEC	CXA La Paloma	Form 1304, 3Q23 Declaration
10/27/2023	CEC	CXA La Paloma	Air Quality (AQ) Quarterly Report - 3Q23
10/27/2023	SJVAPCD	CXA La Paloma	Quarterly CEMS Report - 3Q23
12/21/2023	SJVAPCD	CXA La Paloma	Submit Annual Source Test Report to District - Unit 4

ATTACHMENT F

REVISIONS TO ON-SITE CONTINGENCY PLAN

LA PALOMA GENERATING PLANT

ON-SITE CONTINGENCY PLAN FOR UNEXPECTED TEMPORARY AND PERMANENT FACILITY CLOSURE

CXA La Paloma, LLC
1760 W. Skyline Road
McKittrick, California 93251

February 2024

TABLE OF CONTENTS

List of Tables

List of Figures

Appendices

RECORD OF CHANGES

Revision Number	Revision Date*	Revision Description	Date Entered	Signature of Person Entering
1	2/17/04	Revised Site Map & Appendices A, B, & C	2/17/04	
2	2/10/05	Cover Page, Table of Contents, Pages 1 & 2, Pages 5 through 7, Site Map, & Appendices A, B, & C	2/10/05	
3	2/13/06	Cover Page, Table of Contents, Page 1, 2, 4, 5, 7, & 9, Site Map, & Appendices A, B, & C	2/13/06	
4	2/20/07	Cover Page, Table of Contents, Pages 1, 2, 3, and 9, Site Map	2/20/07	
5	2/22/08	Cover Page, Table of Contents, Pages 1 through 7 and 9	2/22/08	
6	2/19/09	Cover Page, Pages 1 through 5, and Site Map	2/19/09	
7	2/16/10	Cover Page, Pages 2, 4, 7	2/16/10	
8	2/17/11	Cover Page, Table of Contents, Pages 1, 3, 6 through 8, and Appendices A, B, and C	2/17/11	
9	2/1/12	Cover Page, Pages 8,10, Figure 1 and Appendix A.	2/1/12	
10	2/4/13	Page 8 Insurance carrier change	2/4/13	
11	2/1/14	USEPA contact change- page 5, Waste Transporter update- page 7,	2/1/14	
12	2/1/16	Cover Page, Table of Contents, Pages 1, 2, 3, 5, 6 through 8, and Appendices A, B, and C	2/1/16	Paul Sumal

13	2/1/17	Cover Page, Page 2, Appendix A	2/1/17	Paul Sumal
14	2/8/18	All pages, changed references to LPGC and La Paloma Generating Company changed to CXA La Paloma and from Rockland Capital to Kelson Energy.	2/8/18	Paul Sumal
15	2/12/19	Cover Page, Page 2, Appendix A.	2/12/19	Paul Sumal
16	2/10/19	Cover Page, Page 2, Appendix A.	2/10/19	Paul Sumal
17	2/13/20	Cover Page, Page 2, Appendices A, B and C	2/13/20	Paul Sumal
18	2/17/21	Cover Page, Page 2, Appendices A, B and C	2/17/21	Paul Sumal
19	2/16/22	Cover Page, Page 2, 5 & 8 Appendices A, B and C	2/16/22	Paul Sumal
20	2/16/23	Cover Page, Page 2, 3, & 8 Appendices A, B and C	2/16/23	Paul Sumal
21	2/26/24	Cover Page, Page 2, 3, & 8 Appendices A, B and C	2/26/24	Paul Sumal

*Note: Pursuant to Condition 9 of the Annual Compliance Report Section of the CEC Decision, the On-Site Contingency Plan is reviewed and updated annually, as necessary. The Record of Changes is documented in the Annual Compliance Report.

UPDATE NOTICE

To all holders of the "On-Site Contingency Plan for Unexpected Temporary and Permanent Facility Closure" for the Plant:

Revision Number: 21
Date: 2/26/24

Attached are revised pages for the "On-Site Contingency Plan for Unexpected Temporary and Permanent Facility Closure" that has been assigned to you. Please remove the pages in your book and replace them with these revisions.

Remove Old Pages	Replace with Revised Pages
All Pages	All Pages

INTRODUCTION

The On-Site Contingency Plan for Unexpected Temporary and Permanent Facility Closure was prepared in accordance with the California Energy Commission's (CEC) Commission Decision Docket Number 98-AFC-2, Section IV – General Conditions for Closure Plan. CXA La Paloma, LLC (CXA LA PALOMA) personnel will use this plan in the event of an unexpected temporary or permanent closure. The CEC defines "unexpected temporary closure" as:

> *This unplanned unexpected temporary closure occurs when the facility is closed suddenly and/or unexpectedly, on a short-term basis, due to unforeseen circumstances such as a natural disaster, or an emergency.*[1]

"Unexpected permanent closure" is defined as:

> *This unplanned unexpected permanent closure occurs if the project owner closes the facility suddenly and/or unexpectedly, on a permanent basis. This includes both when an owner is implementing the on-site contingency plan, and when the project owner has abandoned the project.*[1]

The purpose of this plan is to provide an on-site contingency plan in order to ensure that the unexpected closure occurs in such a way that public health and safety and the environment are protected from adverse impacts. The plan covers written procedures concerning site security, hazardous materials and waste removal, and insurance and warranty coverage.

NOTIFICATION PROCEDURES

In the event of an unexpected temporary or permanent closure, the Plant Manager or designee shall notify the CEC Compliance Project Manager (CPM) and other responsible agencies within 24 hours and take all necessary steps to implement this Plan. Notification shall be made by either telephone, fax, or e-mail (see Table 1). The Plant Manager shall also keep the CPM informed of the circumstances and expected duration of the closure.

If the Plant Manager or CPM determines that a temporary closure is likely to be permanent, or for a duration of more than twelve months, a closure plan consistent with CEC requirements for a planned closure shall be developed and submitted to the CPM within 90 days of the CPM's determination (or another period mutually agreed to by the owner and the CPM).

[1] California Energy Commission, La Paloma Generating Project Commission Decision (98-AFC-2), October 1999, p. 31.

TABLE 1
AGENCIES TO BE NOTIFIED

California Energy Commission	
Ashley Gutierrez Compliance Project Manager 715 P Street, MS-2000 Sacramento, CA 95814	Tel.: (916) 839-0400 Fax: (916) 654-3882 E-mail: ashley.gutierrez@energy.ca.us
California Occupational Safety and Health Administration ("Cal OSHA")	
Cal/OSHA 2550 Mariposa Street, Suite 4000 Fresno, CA 93721	Tel.: (559) 445-5302 Fax: (559) 445-5786
Kern County Fire Department	
Captain Brad Brazeau K.C.F.D. - Sta. 24 23246 - 2nd St., McKittrick, CA 93251	Tel.: (661) 762-7396
Regional Water Quality Control Board – Central Valley Region	
Matt Scroggins 1685 "E" Street Fresno, CA 93706-2007	Tel.: (559) 445-5116 Tel.: (559) 445-6042 Fax: (559) 445-5910 E-mail: Matt.Scroggins@waterboards.ca.gov
San Joaquin Valley Air Pollution Control District	
Dave Born 34946 Flyover Court Bakersfield, CA 93308	Tel.: (661) 392-5559 Fax: (661) 392-5585 E-mail: Dave.Born@valleyair.org
Kern County Environmental Health Services Department	
Brynn Carrigan, Director 2700 "M" Street, Suite 300 Bakersfield, CA 93301-2370	Tel.: (661) 862-8700 Fax: (661) 862-8701 E-mail: eh@co.kern.ca.us
US Environmental Protection Agency – Region IX	
Roshni Brahmbhatt 75 Hawthorne Street, AIR-5 San Francisco, CA 94105-3901	Tel.: (415) 972-3995 Fax: (415) 947-3579 Email: AEO_R9@epa.gov
David Albright Groundwater Office, WTR-9 75 Hawthorne Street, AIR-5 San Francisco, CA 94105-3901	Tel.: (415) 972-3971 Fax: (415) 947-3545 E-mail: albright.david@epa.gov
California Department of Fish & Game	
Laura Peterson Diaz 1234 East Shaw Avenue Fresno, CA 93710	Tel.: (559) 243-4014 x225 Fax: (559) 243-4020
US Bureau of Land Management	
Larry Saslaw 3801 Pegasus Drive Bakersfield, CA 93308	Tel.: (661) 391-6086 Fax: (661) 391-6041 Email: Lawrence_saslaw@ca.blm.gov

PLANT SHUT DOWN PROCEDURE

In the event of a plant closure, CXA LA PALOMA personnel will shut down all operating equipment that is not necessary to respond to an emergency, in accordance with plant operating procedures. In the event of an emergency shutdown (e.g., fire, earthquake, sabotage, etc.), CXA LA PALOMA personnel should consult Appendix A to this document, "La Paloma Generating Plant Emergency Response Plan Reference Manual" (ERP). As the ERP states, the purpose of this procedure is to provide emergency response guidelines so that the CXA LA PALOMA shift and management personnel can adequately evaluate the situation and respond in the interests of protecting personnel, company resources, and the environment.

The ERP provides guidelines for emergencies, including accidental release of toxic gases, chemical spills, fires, explosions, bomb threats, threats to security, and personnel injuries. There are several situations that may require emergency response by site personnel. The response required for each situation may vary, and each requires a separate plan. The individual plans are discussed in the ERP.

In the event of an emergency, the Incident Commander (IC) shall act as the lead Emergency Coordinator to determine whether to evacuate an area.

SITE SECURITY AND EMERGENCY RESPONSE

An eight-foot-high chain-link fence surrounds the La Paloma Generating Plant. The main gate, which is controlled/activated by keypad and verbal communication with the Control Room, is located on Skyline Road. Entry into the Plant is monitored by remote camera 24 hours per day, 365 days per year from the Control Room. The duties of the Plant Operators include checking plant security measures during each shift.

In the event of an unexpected closure, CXA LA PALOMA will ensure that the plant fence is intact and either use a manned guard or private security services to maintain site security, if necessary.

In the event of an emergency, the Kern County Fire Department will have access through the main gate. The Fire Department will also have access to copies of the following documents:

- SMP-2 – Emergency Response Plan – (Appendix A, attached)
- SMP-8 – HAZMAT Communication Program (Appendix B, attached)
- SMP-4 – Fire Prevention Plan (Appendix C, attached)
- Hazardous Materials Business Plan
- Risk Management Plan

The information contained in these plans will enable the Fire Department to respond to any emergency in the event that station personnel have evacuated the premises.

HAZARDOUS MATERIAL AND WASTE REMOVAL

Handling and disposal of all hazardous materials and wastes shall be in accordance with all applicable laws, ordinances, regulations, and standards. Refer to Figure 1 for the location of all hazardous materials that are routinely present at the CXA LA PALOMA. In the event of an unexpected temporary closure, not all hazardous materials may require removal. In such an event, CXA LA PALOMA will conduct a visual inspection of all hazardous material storage vessels to assess container integrity. Hazardous wastes will be disposed of per applicable regulations, based on the generator status of CXA LA PALOMA prior to the unexpected facility closure date (i.e., within 90 days for a large quantity generator and 180 days for a small quantity generator, per 40 CFR 262.34).

CXA LA PALOMA has implemented a comprehensive HAZMAT Communication Program, as defined in SMP-8. The objectives of HAZMAT Communication Program is to ensure that all hazardous materials at the CXA LA PALOMA are used and handled in the safest manner possible, to prevent/minimize employee exposure to those materials, and to minimize the effects of an accidental release of those materials, in compliance with applicable laws and regulations. In the event of an unexpected temporary closure, HAZMAT Communication Program will be consulted if it is necessary to remove any hazardous material or waste.

Whenever practical, hazardous materials will be returned to the vender or transferred to another entity that may have use for the material(s). The following waste transporters or other qualified waste transporters will be used if it is deemed necessary to remove any hazardous wastes:

TABLE 2
WASTE TRANSPORTERS

TRANSPORTER	TELEPHONE NUMBER
MP Environmental Services	(661) 393-1151
KVS Transportation Inc	(661) 589-5220
Heritage - Crystal Clean	(661) 322-8258
J. Torres Co, Inc.	(661) 832-2635

If the unexpected temporary closure also results in a release of hazardous materials or waste, plant personnel will consult the ERP, HAZMAT Communication Program, Hazardous Materials Business Plan and/or Risk Management Plan. These plans address accidental release prevention and emergency policies in place at the Plant, a hazardous materials inventory, employee training, location of safety equipment, main utility shutoffs (See Figure 1) for the Plant, and notification methods, and accident investigation procedures. In addition, the Spill Prevention, Control, and Countermeasures Plan describes the necessary actions in the event of an oil spill to prevent spilled material from exiting the site.

Plant personnel will consult the ERP, HAZMAT Communication Program, and the Spill Prevention, Control, and Countermeasures Plan prior to proceeding with any hazardous materials or waste removal.

INSURANCE COVERAGE

CXA LA PALOMA, LLC maintains Property insurance (for both property damage and business interruption losses), General Liability, Umbrella Liability, Auto Liability and Pollution insurance coverage. This insurance coverage is purchased through our broker at Marsh Canada.

Additionally, CXA LA PALOMA has set up a trust at the Bank of New York Mellon in favor of the EPA in the amount of $140,372 per US Environmental Protection Agency (EPA) regulations to demonstrate financial assurance for future plugging and abandonment of UIC Class I Non-Hazardous Waste Injection Well WD-3, Permit No. R9UIC-CA1-FY17-1R. The financial assurance requirements will continue to be met for the remaining lifetime of the well.

UNEXPECTED TEMPORARY CLOSURE

In the event that the CXA LA PALOMA Plant is closed temporarily, there are additional tasks to be performed, including notifications and development of contingency plans for areas of transmission line engineering and biological resources.

Transmission Line Engineering

Prior to electrical generation, CXA LA PALOMA was required to sign a Generator Facility Interconnection Agreement (GFIA), with PG&E, and the Cal ISO which establishes procedures for planned, unexpected temporary, and unexpected permanent closure. These procedures define communication between CXA LA PALOMA and PG&E that is necessary to ensure that plant closure will comply with all applicable laws, ordinances, regulations, and standards (LORS), and that system safety and reliability will not be jeopardized.

Biological Resources

In the case of temporary closure, measures to protect biological resources would be needed only if there were a potential for surface disturbances or releases of harmful materials. If such an event occurs, CXA LA PALOMA will consult with responsible agencies to plan clean up and mitigation of impacts to biological resources.

UNEXPECTED PERMANENT CLOSURE

In the event that the CXA LA PALOMA Plant is closed permanently, there are additional tasks that need to be performed, including preparing a facility closure plan, notifying agencies, ensuring site security, removing hazardous materials and wastes, and providing for closure of the injection well.

Facility Closure Plan

In order to ensure that the permanent closure does not create adverse impacts, a closure process will be undertaken by CXA LA PALOMA that provides for careful consideration of available options, applicable laws, ordinances, regulations, standards, and local plans in existence at the time of closure. CXA LA PALOMA will meet with the CEC and other agencies as necessary prior to the development of the closure plan to establish the elements of the plan. In accordance with CEC Condition of Certification GEN-9, the plan will include the following:

1) Future plans for the site (e.g., redevelopment, selling property, etc.)
2) Information required by specific CEC Conditions of Certification (VIS-3, Fire Protection-2, etc.)
3) A plan for the removal of hazardous materials stored on site. If hazardous waste or contamination exists (or there is a possibility that contamination exists), a plan to conduct an environmental site assessment and remediate those wastes shall be prepared. The plan will be submitted to the Department of Toxic Substances Control, Regional Water Quality Control Board, or other appropriate agency with jurisdiction over the remediation.
4) A discussion of potential impacts and mitigation to address significant adverse impacts associated with proposed closure activities, and to address facilities, equipment, or other plant-related remnants that will remain at the site.
5) A schedule of activities for closure of the power plant site, raw water pipeline, transmission line corridor, gas meter station, injection well, and all other appurtenant facilities included as part of the plant site.
6) A list of any facilities or equipment intended to remain on site after closure, including the reason it must remain, and its intended future use, if any.
7) A discussion on conformance of the plan with all applicable laws, ordinances, regulations, standards, local/regional plans in existence at the time of plant closure and applicable conditions of certification.

The plan will be submitted to the CEC's CPM and Kern County for review and approval at least 12 months (or other mutually agreed-to time) prior to commencing the permanent closure activities.

Agency Notification

Additional notification may be necessary in the event of a permanent closure, including re-notifying each of the agencies listed in Table 1. The Closure Plan will also be sent to those appropriate agencies with which CXA LA PALOMA has a current permit (e.g., Regional Water Quality Control Board, San Joaquin Valley Air Pollution Control District, USEPA, etc.).

Site Security

Prior to permanent closure, the Plant Manger or designee will notify the Kern County Fire Department and Sheriff's Department, giving them notice that the existing level of site surveillance will not be in effect. This will enable these agencies to respond appropriately in the event of a disturbance or fire. It may be necessary for CXA LA PALOMA to provide site security for the period following permanent closure. The Plant Manager or designee will determine the need for such interim security and will address it in the Closure Plan, if necessary.

Removal of Hazardous Materials and Waste

As required by the CEC Decision, CXA LA PALOMA is responsible for removing all hazardous materials from the site as part of permanent site closure. If CXA LA PALOMA intends to redevelop the site, other plans may be made to either remove or store materials in a different location. The details of the removal will be covered in the Closure Plan.

Biological, Cultural and Paleontological Resources

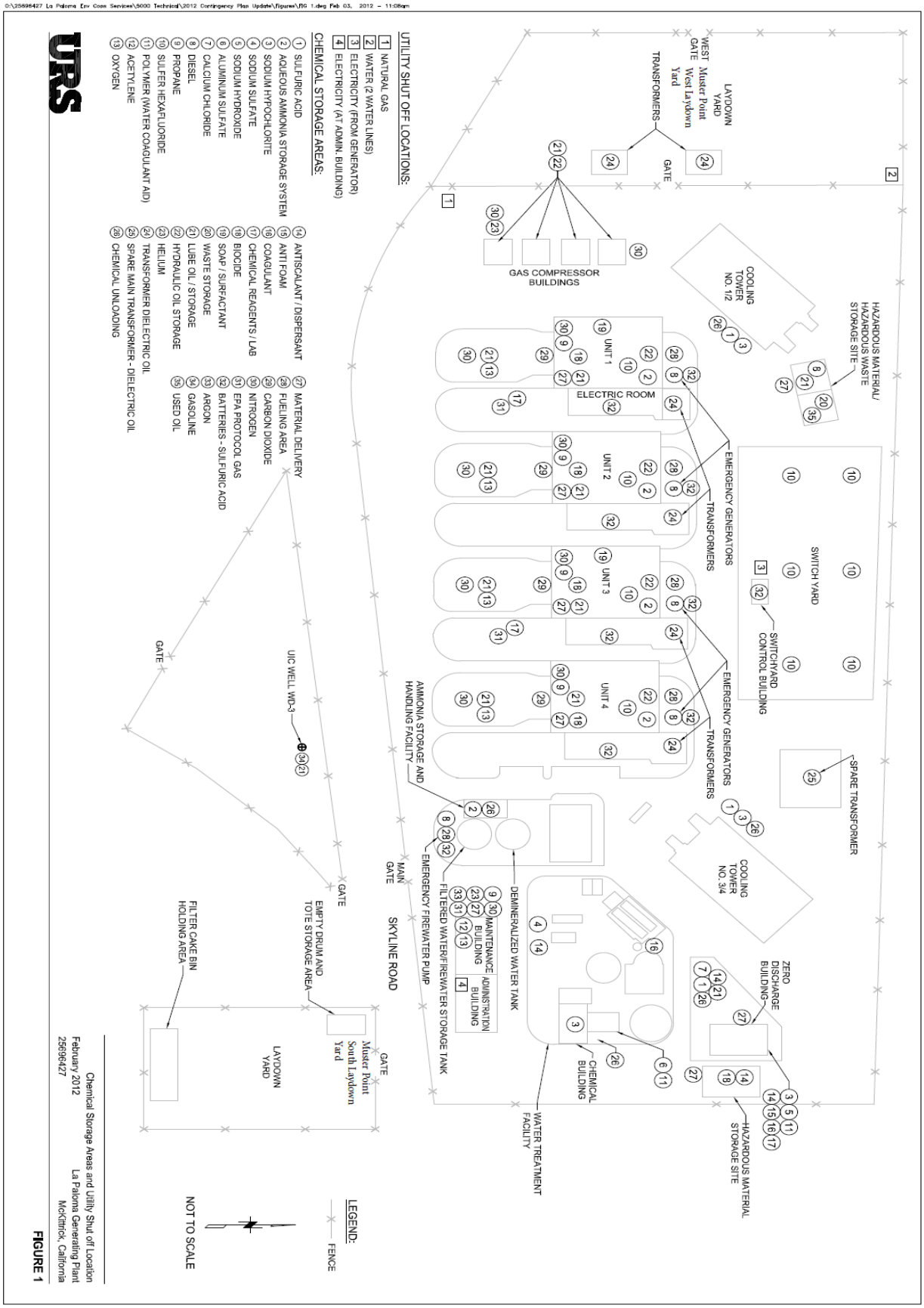
When a permanent Closure Plan is prepared, it will include the take avoidance and mitigation requirements in effect at the time for the species that would be impacted. The plan will also include the removal of the transmission facilities when they are no longer used and useful and reclamation of areas where facilities would be removed. This may include ripping of soil, contouring of disturbed areas, and implementation of erosion control, revegetation, and other measures deemed appropriate at the time the Closure Plan is developed.

Biological resources compliance reporting for closure activities would likely include pre-activity survey reports, environmental monitoring reports during reclamation, and a final report describing the closure activities and any follow-on reclamation work that would be required.

The permanent Closure Plan will include a description regarding the potential of the closure activities to impact cultural and paleontological resources. The closure requirements are to be based upon the Cultural Resources and the Paleontological Resources Final Reports. If no activities are proposed that would potentially impact either of these resources, no mitigation measures will be required.

Closure of the Injection Well

In the event of a permanent closure, CXA LA PALOMA is required to close, plug, and abandon the underground injection operation after a cessation of injection of two years, as provided in the Plugging and Abandonment Plan, unless CXA LA PALOMA otherwise notifies EPA of its intent to maintain the well in an open condition beyond the 2 years. CXA LA PALOMA has established a Letter of Credit to maintain financial responsibility for this well closure.


UTILITY SHUT OFF LOCATIONS:
1 NATURAL GAS
2 WATER (2 WATER LINES)
3 ELECTRICITY (FROM GENERATOR)
4 ELECTRICITY (AT ADMIN. BUILDING)
CHEMICAL STORAGE AREAS:
1 SULFURIC ACID
2 AQUEOUS AMMONIA STORAGE SYSTEM
3 SODIUM HYPOCHLORITE
4 SODIUM SULFATE
5 SODIUM HYDROXIDE
6 ALUMINUM SULFATE
7 CALCIUM CHLORIDE
8 DIESEL
9 PROPANE
10 SULFER HEXAFLUORIDE
11 POLYMER (WATER COAGULANT AID)
12 ACETYLENE
13 OXYGEN
14 ANTISCALANT / DISPERSANT
15 ANTI FOAM
16 COAGULANT
17 CHEMICAL REAGENTS / LAB
18 BIOCIDE
19 SOAP / SURFACTANT
20 WASTE STORAGE
21 LUBE OIL / STORAGE
22 HYDRAULIC OIL STORAGE
23 HELIUM
24 TRANSFORMER DIELECTRIC OIL
25 SPARE MAIN TRANSFORMER - DIELECTRIC OIL
26 CHEMICAL UNLOADING
27 MATERIAL DELIVERY
28 FUELING AREA
29 CARBON DIOXIDE
30 NITROGEN
31 EPA PROTOCOL GAS
32 BATTERIES - SULFURIC ACID
33 ARGON
34 GASOLINE
35 USED OIL
HAZARDOUS MATERIAL/ HAZARDOUS WASTE STORAGE SITE
LAYDOWN YARD
WEST GATE
Muster Point
West Laydown Yard
TRANSFORMERS
GATE
COOLING TOWER NO. 1/2
GAS COMPRESSOR BUILDINGS
UNIT 1
UNIT 2
UNIT 3
UNIT 4
ELECTRIC ROOM
EMERGENCY GENERATORS
TRANSFORMERS
SWITCH YARD
SWITCHYARD CONTROL BUILDING
SPARE TRANSFORMER
COOLING TOWER NO. 3/4
ZERO DISCHARGE BUILDING
HAZARDOUS MATERIAL STORAGE SITE
WATER TREATMENT FACILITY
CHEMICAL BUILDING
DEMINERALIZED WATER TANK
MAINTENANCE BUILDING
ADMINISTRATION BUILDING
FILTERED WATER/FIREWATER STORAGE TANK
EMERGENCY FIREWATER PUMP
AMMONIA STORAGE AND HANDLING FACILITY
MAIN GATE
SKYLINE ROAD
UIC WELL WD-3
GATE
EMPTY DRUM AND TOTE STORAGE AREA
FILTER CAKE BIN HOLDING AREA
GATE
Muster Point
South Laydown Yard
LAYDOWN YARD
LEGEND:
FENCE
NOT TO SCALE
URS
Chemical Storage Areas and Utility Shut off Location
February 2012
25696427
La Paloma Generating Plant
McKittrick, California
FIGURE 1

Emergency Response Plan (no ICP)

Safety Manual Program (SMP)

Introduction

Purpose:

The purpose of this procedure is to ensure that workers have the necessary equipment, know where to go, and know how to keep themselves safe when an emergency occurs. The procedure establishes guidelines for responding to plant emergencies. The instructions in this SMP apply to all plant personnel, contractors, and any others who may be on the plant site during a fire, chemical release or spill, medical emergency, severe weather, or bomb threat.

Scope:

All Site Personnel, All NAES Employees

Responsibilities

1 PLANT MANAGER

Is responsible for the development, revision, and implementation of this plan and for assigning the associated responsibilities of Emergency Coordinator and Evacuation Coordinator to selected employees so that emergencies shall be effectively managed at all times of day or week.

② EMERGENCY COORDINATOR

Is responsible for conducting Fire and Evacuation drills. The Emergency Coordinator is responsible for ensuring the Fire Department is notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan. The Emergency Coordinator shall designate an Evacuation Coordinator if the emergency requires personnel to evacuate.

③ CONTROL ROOM OPERATOR

Acts as the Emergency Coordinator until relieved by management.
Accounts for all personnel on-site.

④ EVACUATION COORDINATOR

MAINTAINS communication with Emergency Coordinator.

REPORTS status of evacuated personnel to Emergency Coordinator.

The Evacuation Coordinator may be any qualified plant employee.

⑤ ALL PERSONNEL

PARTICIPATE in training on their work areas regarding fire routes, exits, the location and use of emergency equipment, and understanding and following this plan.

ENSURE contractors or visitors at the facility are familiar with this plan.

Policy

① EMERGENCY RESPONSE OVERVIEW

This procedure provides immediate action steps to be used in a variety of emergencies. It is impossible to provide the exact steps to be followed in all emergencies and emergencies can involve several types of problems at once (a fire with corresponding injuries and a release of hazardous materials for example). Also, the sequence of actions in this procedure may not be the best sequence given the specific situation of an emergency. Steps in this procedure should be performed in an order that fits each situation, relying on sound judgment from plant operators.

A. **General Referencing**

Use the Emergency Response Call Record Form (Appendix E) to document all notifications made during an emergency, including all instructions given by parties contacted. The Emergency Response Contact List (Appendix F) should be posted in the Control Room. Reporting guidelines for accidents and injuries, and for "near-miss" safety/environmental accidents, are covered later in this Safety Manual (SMP-14, Accident and Injury Reporting).

② HAZARDOUS WASTE OPERATIONS & EMERGENCY RESPONSE (HAZWOPER)

A. **Spill Response**

The following steps will be performed immediately upon observation of a hazardous material spill. This procedure is intended to be a concise list of the basic emergency response steps and must be used in conjunction with the Hazardous Material Spill Training and Follow-up section below.

A.1. **NOTIFY** Control Room Operator or Designee and all personnel on site of spill/release.

The Plant Manager, NAES Headquarters Managers, and the Owner's Representative shall be notified as soon as possible. This requirement should never interfere with proper physical responses to an emergency.

A.2. **ENSURE** all personnel are evacuated from the spill area.

A.3. **ATTEND** to any injured personnel.

A.4. **IF** necessary, **THEN EVACUATE** the entire plant via designated route shown in Appendix A.

Personnel may be directed to go to a particular area of the plant to evacuate the area of the emergency if evacuation of the site is undesirable.

a. Plant Manager or Designee **DESIGNATES** evacuation route and muster location.

b. **IF** evacuation of plant is undesirable, **THEN EVACUATE** as directed to secondary location.

A.5. **IF** Emergency involves toxic airborne release, **THEN:**

a. Plant Manager or Designee **EVALUATES** release and wind conditions.

NOTE
The shelter-in-place concept is preferable in the situation where a high concentration cloud of toxic gas passes a building containing people.

b. **DETERMINE** whether to evacuate personnel or "shelter-in-place".

The shelter-in-place concept is preferable in the situation where a high concentration cloud of toxic gas passes a building containing people.

c. **IF** the gas cloud is moving in the direction of the control room, **THEN:**

1. **SHUT DOWN** all air conditioning and ventilation systems.

2. All personnel **ENTER** control room area.

3. **CLOSE** all doors leading to the control room area.

A.6. **IF** safe option exists, **THEN STOP** the spill at source provided this can be accomplished without causing physical injury.

Examples include:

- **SHUT OFF** pumps,
- **CLOSE** valves,
- **DISCONTINUE** loading/unloading operations.

NOTE
The Plant Manager, NAES Headquarters Managers, and the Owner's Representative shall be notified as soon as possible. This requirement should never interfere with proper physical responses to the emergency.

A.7. The Plant Manager will **INSTRUCT** plant personnel further on spill response measures.

a. **IF** Plant Manager **DETERMINES** that the spill or measures to prevent, contain, control, or clean up the spill is beyond the capability of the facility's ability, training, manpower, or equipment, **THEN CONTACT** Outside Hazardous Materials Emergency Responders and remediation contractors to help control/clean up the spill.

A.8. **IF** spill or release may place the public at risk, **THEN INITIATE** Public Warnings through local emergency agencies listed on the *Emergency Response Contact List* (Appendix F).

A.9. Plant Manager or designee **MAINTAINS** plant security and communications.

a. Owner Representative only **APPROVES** admission to members of the press.

b. Owner Representative or designee **COORDINATES** all public relations, press releases, and outside inquiries.

A.10. **UTILIZE** every reasonable effort to maintain spill on plant property.

A.11. **IF** the material has been released from the containment system, **THEN PREVENT** spill from entering storm sewers, public waters, or from escaping the facility property as long as it is safe to do so.

A.12. **REFERENCE** Safety Data Sheets (SDS) for proper use of personal protective equipment.

A.13. **Take action** to stop the flow of the spill; examples may include:

- **BUILD** berms,
- **PLACE** absorbent materials,
- **PLUG** storm drain inlets, culverts, and ditches leaving the plant

NOTE

Plant personnel are only qualified to respond to a spill at the First Responder - Operations level. Response to the spill can involve operating equipment remotely or placing absorbents in the flow path, if done without placing employees in an unsafe condition.

A.14. **DOCUMENT** all events in detail as soon as possible.

A.15. **FOLLOW UP** with all emergency response organizations, NAES headquarters, and the Owner Representative to ensure all reporting requirements have been met.

A.16. **REPORT** all injuries in accordance with *Injury Response & Reporting* (SMP).

B. Hazardous Material Spill Training & Follow-up

This section provides details and information to be used in preparation for and response to emergencies involving hazardous materials incidents in compliance with OSHA Hazardous Waste Operations and Emergency Response Standard. This section is also to be used in conjunction with the facility Spill Prevention, Control, and Countermeasure Plan (SPCC) if the spill involves a fuel oil spill at the plant. The SPCC is required by EPA oil spill regulations 40 CFR 110 (which defines the discharge of oil) and 40 CFR 112.3 (which requires an SPCC). The SPCC is a spill prevention plan (that is, actions to be taken before the spill occurs), while this procedure is a spill response plan (that is, an action to be taken after the spill occurs).

Guidance pertaining to employee safety and training related to major hazardous materials releases and subsequent cleanup operations is contained in 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, referred to as HAZWOPER.

B.1. Overview of Hazardous Materials

The chemicals listed in Appendix H possess characteristics which could, if released in an uncontrolled manner and in sufficient quantity (above a specified threshold quantity), necessitate an emergency response under regulations specified by 29 CFR 1910.120.

B.2. Hazardous Materials Release Guidelines

Incidental releases can be controlled, contained, and cleaned up by employees in the immediate area. No outside or special assistance is required. Nuisance spills and minor releases which do not require immediate attention (due to lack of danger to employees) would be considered within the normal activities and training of the employee.

Incidental releases for the purposes of operator training and response activities pertaining to the unintended release of hazardous materials on-site, may be approached, controlled, stopped, absorbed, neutralized, and cleaned up as long as plant personnel do not endanger themselves, others, or the environment in the process.

- Personnel will carry out system operations at a safe distance to minimize the severity of the release.
- Remote control of valves and pumps will be employed as available to minimize the necessity of approaching the point of origin of an incidental release.
- Personnel will employ PPE, as needed and for which they are trained, to minimize potential for contact with the released materials.

- Clean up and hazardous material disposal techniques will be followed to ensure safe and efficient return to normal operations.
- Recording and reporting of the release should be made promptly as described in the Notification section below.
- The Plant Manager, or a designee, shall review the situation and notification requirements to determine what outside organizations are required to be notified.
- As a minimum, the Owner Representative and NAES Headquarters Managers shall be notified. Refer to the table at Appendix H for Reportable/Threshold Quantities for any Extremely Hazardous Substances that are stored on-site. Proper decontamination of equipment and PPE shall be implemented after the cleanup is completed.

A hazardous materials emergency response is any response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release, which may cause high levels of exposure to toxic substances, or which poses danger to employees requiring immediate attention.

- No employee shall attempt to perform actions for which they have not been prepared, through training and experience, or for which they are not properly equipped.
- On-site and off-site training will be conducted both initially and on a continuing basis, as necessary, to ensure that personnel have the knowledge and experience to make a reasonable determination of the dangers when faced with a release situation.
- If an uncontrolled release occurs resulting in an emergency, the designated off-site emergency response organizations shall be contacted. Refer to the *Emergency Response Contact (Phone) List* in (Appendix F).

Refer to SMP-14 Section #4 for details on reporting any accidental release (whether onsite or offsite) which results in a fatality, serious injury, or substantial property damage.

B.3. Resource Allocation

The Plant Manager has the authority to commit resources and funds for any spill remediation activity. He may delegate duties to other employees to expedite spill containment, clean-up, and disposal. In the event of a major spill or release, the Plant Manager will oversee the handling and cleanup of the toxic material. The clean-up may be delegated to a licensed spill cleanup company or a government agency (i.e., Ammonia supplier or other chemical supplier, Fire Department, or commercial response organization). The Plant Manager, or a designee, would remain in charge of the overall plant operation and coordination of

spill response activities. Note: the Fire Department has the authority to take over the position of Incident Commander upon advisement.

B.4. Emergency Response Training

Training shall be based on the duties and functions to be performed by each employee. Documentation of such training, including program agendas (with a copy of any outlines, overheads, or handouts) and training rosters shall be maintained.

Facility response personnel are given instructions in emergency procedures related to the release of a hazardous substance or any hazardous chemical. Topics of instruction include emergency equipment (proper use, inspection, and maintenance procedures), emergency systems (such as alarms/communications, key cut off systems for automatic feed systems), response procedures for fires, explosions, and spills (including spills to groundwater), and the organizational responsibilities of response personnel under the National Incident Management System.

B.5. First Responder Awareness Level

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They will take no further action beyond notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

- An understanding of what hazardous substances are, and the risks associated with them in an incident.
- An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- The ability to recognize the presence of hazardous substances in an emergency.
- An understanding of the role of the first responder awareness individual in the employer emergency response plan, including site security and control, and the DOT Emergency Response Guidebook.
- The ability to realize the need for additional resources, and to make the appropriate notifications to the communications center.

B.6. First Responder Operations Level

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually, trying to stop the release. Their function is to contain the spill from a safe

distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level:

- Knowledge of the basic hazard and risk assessment techniques.
- Knowledge of how to select and use proper PPE provided to the first responder operational level.
- An understanding of basic hazardous materials terms.
- Knowledge of how to perform basic control, containment and/or confinement within the capabilities of the resources and PPE available within their unit.
- Knowledge of how to implement basic decontamination procedures.
- An understanding of the relevant standard operating and termination procedures.

B.7. Spill Response

1. Upon observation of a release of a hazardous material, chemical, or oil, employees IMMEDIATELY **NOTIFY** Plant Manager with information concerning the spill:

   - Employee name
   - Location of spill
   - Type and quantity of material spilled
   - Actions and result of actions taken to mitigate the spill
   - Circumstances that caused the spill

2. Plant Manager or Designee **NOTIFIES** necessary organizations and governmental agencies listed on the Emergency Contact (Phone) List in Appendix F.

3. **IF** necessary, Plant Manager or Designee **CONTACTS** outside Hazardous Materials Emergency Response organizations and/or hazardous waste clean-up contractors to assist in the remediation of the spill.

4. Plant Manager or Designee **NOTIFIES** NAES management and Owner Representative of all spills regardless of quantity and type as soon as practical.

5. Plant Manager or Designee **PROVIDES** the following information in the agency notification:

a. Facility name, exact location, and phone number

b. Source and cause of spill

c. Type (chemical name), volume of material released, and whether the material is classified as extremely hazardous

d. The estimated volume that reached navigable waters

e. Time, date, and duration of the spill

f. Medium of release (air, soil, water) and anticipated release movement

g. Actions taken and anticipated

h. State whether evacuation is needed

i. Weather conditions, if applicable

j. Known health risks and required medical attention

k. Names of other parties contacted

l. Names of other parties to be contacted

6. **WHEN** recording notifications, **DOCUMENT** the following:

   a. **REPORT** factual notifications,

   b. **AVOID** speculation,

   c. **MAINTAIN** record of all notifications made including all instructions given by parties contacted using the *Emergency Response Call Record Form* shown on Appendix E.

WARNING **Under no circumstances shall any plant personnel provide information to media or the general public concerning the spill**

7. **REFER** all inquiries from the media and the public to the Plant Manager or designee.

8. Plant Manager **REFERS** all inquiries to the Owner Representative.

9. For plants with fuel oil:

   Per 40 CFR 112.4, in the event that a discharge of 1,000 gallons of oil escapes the containment systems and enters into the navigable waters of the United States in a single spill event or a discharge of harmful quantities in two spill events within any twelve-month period occurs, the Plant Manager will submit notification in writing to the EPA Regional Administrator as per EPA regulations:

NOTE
The following information is required in the above notification. An asterisk (*) denotes information included in the SPCC plan.

   a. A complete copy of the SPCC plan

   b. Name, phone number, and address of the facility (*)

   c. Owner and operator name and address (*)

   d. Date and year of initial facility operation (*)

   e. Maximum storage capacity and average daily use (*)

   f. Description of the facility (*)

   g. Quantity and type of material spilled

   h. Cause(s) of the spill(s)

   i. Corrective actions

   j. Additional preventative measures

   k. Other pertinent information

10. Within 24 hours, Plant Staff shall initiate an **INVESTIGATION** of any incident that resulted in, or could reasonably have resulted in, a release of hazardous materials.

B.8. Managerial Responsibilities

Managerial responsibilities following a Hazmat release include;

- Determining origin of incident
- Investigating effectiveness of this procedure
- Evaluating potential need for modifications to procedure and plant personal response.

NAES will be responsible for the implementation and communication of any changes to this procedure following an accidental release of aqueous ammonia. A summary shall be prepared at the conclusion of the investigation that includes at a minimum:

- Date of incident and investigation
- A description of the incident
- The factors that contributed to the incident
- Any recommendations resulting from the investigation

The managers of the facility will promptly address and resolve the investigation findings and recommendations. Resolutions and corrective actions shall be documented. The findings shall be reviewed with all affected personnel whose job tasks are affected by the findings. Investigation summaries shall be retained for five years in the plant environmental files.

B.9. Spill Clean-up and Disposal Procedure

Cleanup will be conducted to coordinate collection for isolation and disposal of contaminated products and materials, as appropriate. The categories listed below will be isolated and secured independently. These steps are necessary to reduce costs associated with clean up and disposal of contaminated materials.

- Recovered pure product for possible refining and reuse
- Contaminated PPE for separate disposal
- Oiled debris for separate disposal, i.e., wood products, beauty bark, etc.
- Contaminated soils for possible incineration or separate disposal
- Absorbent materials for incineration

All residuals (recovered chemicals, contaminated clean up materials, and contaminated soil) resulting from spill remediation will be placed in containers that have been approved for use as such.

Disposal of spilled material will meet all Federal and State regulations guiding the disposal of waste. Hazardous waste manifests will accompany containers of spill residues if the residue is identified as a hazardous waste in accordance with state and federal hazardous waste regulations. All required labeling and recordkeeping

requirements will be followed.

Consult the applicable Material Safety Data Sheet for the substance to determine the appropriate cleanup procedures. Ensure all plant and contractor personnel assisting with the clean-up are aware of clean-up instructions and hazards listed on the SDS.

Refer to the facility Environmental instructions for further guidelines on the disposal of hazardous materials. Additionally, contact NAES headquarters and or the NAES Environmental Support Services (ESS) Division for assistance, if needed.

③ FIRE RESPONSE PROCEDURE

A. In the event of any fire, immediately **REPORT** fire to the Control Room Operator (CRO) via plant radio, cell phone, or other means.

A.1. The report to the CRO shall include the following:

- Your name
- Nature of event – “Fire”
- Location of the fire
- Severity of the fire
- Your planned action (e.g., evacuate or use fire extinguisher)

NOTE
Incipient stage fire means a fire which is in the initial or beginning stage and which can be controlled or extinguished by one person with one portable fire extinguisher.

B. **IF** fire is in incipient stage **AND** Respondent is properly trained, **RESPOND** using appropriate fire response equipment. EXCEPTIONS: site SOP's for handling coal fires will take precedence over this procedure.

WARNING

PERSONNEL INJURY or DEATH may occur if fire progresses to a life-threatening event, so evacuate the area immediately .and notify the Control Room

C. **IF** fire progresses beyond incipient stage, **THEN EVACUATE** immediate area to safe place.

D. **IF** fire is beyond the incipient stage **AND** requires outside emergency response, **THEN** the CRO will:

D.1. **CONTACT** 911,

D.2. **SOUND** plant evacuation alarm.

E. To facilitate a quick response, Plant **DESIGNATES** liaison to meet the Fire Response Service at the main entrance gate.

F. Plant personnel **EVACUATE** to Primary Evacuation Area identified in Appendix A.

F.1. **IF** necessary, **THEN DETERMINE** a secondary evacuation area based upon site conditions and wind direction (as determined by the windsock).

G. **UTILIZE** the Visitor Logbook from the Administration Building to aid in accounting for all personnel.

NOTE
In the event of a natural gas leak of any size, immediately shut the Fuel Emergency Stop Valve (i.e.. slam shut valve) from the control room.

④ FIRE RESPONSE DRILL

A. Annually **CONDUCT** Fire Evacuation Drills.

A.1. **MAINTAIN** written record of all drills performed.

A.2. **CORRECT** deficiencies observed during drills.

B. At a minimum, **TEST** Plant Evacuation Alarm monthly.

⑤ CHEMICAL RELEASE/SPILL PROCEDURE

A. In the event of a chemical spill or release, immediately report it to the CRO via plant radio, cell phone, or other means. The report to the CRO shall include the following:

- Your name
- Nature of event – “chemical spill/release”
- Location of the spill/release
- Chemical identity and severity of the spill/release (estimate quantity)
- Your planned action (e.g. evacuate or close remote valve)

B. Depending on the chemical and quantity involved, refer to section 4.B for steps necessary to respond to the spill.

NOTE
Immediately call 911 for any emergency that is considered a threatened, uncontrolled release of any hazardous material.

⑥ MEDICAL EMERGENCY

A. **REPORT** all injuries to the supervisor, no matter how minor.

B. First Aid/CPR trained personnel **RESPOND** to minor first aid injuries.

C. **IF** someone is seriously hurt, **THEN NOTIFY** the CRO of the following;

- Location of the injured person
- Nature of the injury
- Any other important information related to the incident scene (ex. down power line next to injured person, chemical drum spill, etc.).

D. CRO **CONTACT** 911 to alert emergency crews. An individual will be designated to meet emergency crews at the main entrance gate.

E. CRO **ANNOUNCES** for all available First Aid/CPR trained personnel to **REPORT** to the incident site.

E.1. The First Aid/CPR trained personnel **ADMINISTER** First Aid and any other measures within their training until the emergency crews arrive at the scene.

F. **IF** the situation warrants the rescue of an unconscious or immobile person from a confined space, a collapsed trench, or an elevated surface or personal fall arrest system, **THEN**:

F.1. CRO **CONTACTS** 911,

F.2. CRO **REPORTS** to emergency personnel the type, location, and hazards of the area.

Site Specific (La Paloma) Considerations for SMP-02

Section 1. Reporting Injuries, Incidents and Emergencies to The California Public Utilities Commission (CPUC)

1. Facilities generating 50 MW or greater are required to contact the CPUC and report:
    a. A fatality or personal injury rising to the level of an in-patient hospitalization.
    b. Are the subject of significant public attention or media coverage; or,
    c. Damage to property of the utility or others estimated to exceed $50,000 and are attributable or allegedly attributable to utility owned facilities.
2. Facility must call 866-924-9757 to make a report.
3. Report must be made within 2 hours during working hours and 4 hours outside of working hours.
4. The facility should follow up with an email or fax update within 24-hours and a final report within 20 days to the CPUC:
    a. The report shall identify the time and date of the incident.
    b. The time and date of the notice to the Commission.
    c. The location of the incident.
    d. Casualties which resulted from the incident.
    e. Identification of casualties and property damage.
5. The facility should follow up with full report on the designated form within 30 days to the CPUC
6. The report shall include a description of the utility's response to the incident and the measures the utility took to repair facilities and/or remedy any related problems on the system which may have contributed to the incident.

Section 3. Emergency Response Overview

1. Any incident which results in:
    a. A fatality or personal injury rising to the level of an in-patient hospitalization
    b. Are the subject of significant public attention or media coverage; or,
    c. Damage to property of the utility or others estimated to exceed $50,000 and are attributable or allegedly attributable to utility owned facilities.
2. Plant Management for facilities that generate greater than 50 MW are required to report, within 24 Hours.
    a. Online at: https://ia.cpuc.ca.gov/safetyevents/
    b. If internet unavailable or in the event of an emergency or emerging safety situation call:(415) 355-5503
3. The facility should follow up with an email or fax update within 24-hours and a final report within 20 days to the CPUC.
    a. **NOTE**
    See excerpt from Appendix B to D. 06 04 055
    b. http://www.cpuc.ca.gov/emrep/
    c. The report shall identify:
        1. Time and date of the incident
        2. Time and date of the notice to CPUC
        3. Location of the incident
        4. Casualties which resulted from the incident

5. Identification of casualties and property damage

4. Additionally, facilities must report, within 2 hours during working hours and 4 hours outside of working hours, incidents which involve the release of gas and:
    a. A fatality or personal injury rising to the level of an in-patient hospitalization
    b. Are the subject of significant public attention or media coverage; or,
    c. Damage to property of the utility or others estimated to exceed $50,000 and are attributable or allegedly attributable to utility owned facilities.
    d. **NOTE**
    See excerpts from GO 112-E and CFR 49 § 191.9
5. The facility should follow up with full report on the designated form within 30 days to the CPUC.
6. The report shall include:
    a. Description of the utility's response to the incident
    b. Measures the utility took to repair facilities or remedy any related problems on the system which may have contributed to the incident

⑦ EARTHQUAKES, TORNADOS, & SEVERE STORM EMERGENCIES

A. Earthquakes

A.1. **Immediately get down on the floor. Most injuries during earthquakes occur when persons are knocked to the ground during tremors. TAKE** cover under a desk or strong table or in a doorway, or sit or stand against an inside wall.

A.2. **STAY** away from windows, glass, bookcases, and outside doors.

A.3. **STAY** inside the building during a severe earthquake because of the hazards of downed power lines, falling debris from the building, etc.

A.4. **MOVE** away from buildings and utility wires.

A.5. **WATCH** for falling glass, electrical wires, poles or other debris.

A.6. **CHECK** for injuries and provide first aid.

A.7. **CHECK** for broken fuel lines and electrical faults.

A.8. **ISOLATE** ruptures and faults.

A.9. **CHECK** for ruptures in systems containing hazardous chemicals. **ISOLATE AND CONTAIN** spills.

A.10. **PLACE** plant in a safe condition by shutting down equipment as necessary.

A.11. **Avoid the use of** the telephone except emergency notifications only.

B. Tornadoes & Severe Storms

In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast.

- The Plant Manager shall be notified and will try to be on-site to determine appropriate action.
- **IF** the Plant Manager cannot be contacted, **THEN** the CRO shall determine the appropriate action.
- During severe thunderstorms, caution should be used during outside activities.
- If thunderstorms are in the immediate area of the plant, outside activities should be curtailed.
- The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.

- The best protection in a tornado is usually an underground area. The best above ground areas in a building are:
  - Small interior rooms on the lowest floor without windows,
  - Hallways on lowest floor away from outside doors and windows,
  - Rooms constructed of reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.

B.1. **INSTRUCT** Employees to seek shelter areas as near as possible to inside walls, away from window areas.

B.2. CRO **ANNOUNCES** warnings to all personnel of the outside conditions and to seek shelter inside in a safe location.

B.3. **TAKE SHELTER** as close to the floor as possible and against sturdy machinery that will prevent portions of the roof, etc. from striking directly should they fall.

WARNING
An automobile is not a safe place to be in these circumstances.

B.4. **STAY INSIDE** the building until dangerous wind levels have subsided.

B.5. **IF** outside, **THEN SEEK** safety in a low-lying depression such as a ditch or ravine.

B.6. CRO **ANNOUNCES** indicating when the tornado or severe storm has passed.

B.7. **DESIGNATE** an investigative team to **INSPECT** for:

- All outside plant areas
- Damage to machinery or dangerous debris
- Down power lines
- Other potentially dangerous conditions

⑧ BOMB THREATS & ACTS OF SABOTAGE

The events of September 11, 2001, coupled with the northeast power outage of August 14, 2003 and similar electrical disturbances have heightened the awareness of people worldwide to the threat of Sabotage to critical facilities in general and to the electrical infrastructure in particular. To protect the North American electrical infrastructure (Bulk Electric System), NAES requires that all its power plant managers and operators shall understand and comply with ~~the following~~ NERC requirements.

A. Recognition

Understanding when an act of Sabotage is taking place or is about to take place is the first step towards preventing the subsequent injury and damage that the event can ultimately result in. A variety of tools are available to each NAES-managed facility meant to be used in conjunction with the Emergency Response Plan for any actual or potential Acts of Sabotage. These tools are available as Appendices to this procedure and are described below:

- Appendix B – *Bomb Threat Checklist* - contains a checklist to be used when a bomb threat is received over the phone. This will help the receiver of the call obtain as much information as possible to help find the source.
- Appendix C – *Suspected Bomb/Sabotage Device Safety Precautions* - contains a list of precautions to be taken around unidentified packages, bombs, and suspected Sabotage devices.
- Appendix G - *Actions for Suspected Sabotage Events* - contains a list and description of potential Sabotage events as well as immediate actions to be taken in case of those types of events.

The Plant Manager and all plant personnel and visitors shall maintain and enforce a strict site security policy to try to prevent the occurrence of any potential Sabotage events.

B. **Response**

Although many threats turn out to be hoaxes, it is very important to not dismiss the possibility of injury and damage and treat every situation seriously. When a bomb threat or discovery of a suspected Sabotage event is discovered, remember to not panic, remain calm, and follow the steps below:

For any abnormal events that could potentially be acts of Sabotage, refer to *Actions for Suspected Sabotage Events* (Appendix G).

B.1. Phone calls received regarding a Bomb Threat, or other Act of Sabotage, refer to *Bomb Threat Checklist* (Appendix B) while keeping the following items in mind:

a. **ENGAGE** the caller in as much conversation as possible and complete the checklist as the call progresses. If you are at a phone with caller ID, note the phone number of the caller.

b. **KEEP** the caller on the line as long as possible. Ask the caller to repeat the message even if you fully understood the message the first time. This will stall or cause a delay and allow the operator more time to react properly and involve the necessary personnel.

c. **IF** the caller does not give a location of the device, Sabotage method, or a time for the event, **THEN ATTEMPT** to obtain this information.

d. **INFORM** caller that the building is occupied and that such an event (explosion or equipment destruction) would result in serious injury or death to innocent people.

e. Be aware of the caller's voice and any background noises that may assist in identifying the location of the call.

f. **RECORD** your findings on the checklist.

g. **ATTEMPT** to have the caller speak to a designated member of management.

h. **STAY** on the line until the conversation ends and the caller hangs up.

B.2. **MAINTAIN** security and communications.

a. Plant Manager (or designee) **MAINTAINS** plant security by restricting access so that only essential plant personnel and emergency personnel are admitted.

b. **IF** there are enough people on-site, **THEN MAN** the telephones. Two-way radio communication should be kept free to be used as needed.

c. **RESTRICT** admission to members of the press without the approval of the Owner Representative.

d. Owner Representative or designee **HANDLES** all public relations, press releases, and outside inquiries.

> **WARNING**
> **PERSONNEL INJURY AND DEATH can occur if a suspicious item is touched, moved, jarred, disturbed, or covered.**

B.3. **QUICKLY SEARCH** the plant area for suspicious, unusual, or foreign items (suspected bombs/Sabotage devices).

B.4. **REPORT** any findings.

B.5. **OBSERVE** the precautions listed in Appendix C.

B.6. **WHEN** police arrive, **THEN ASSIST** as necessary with more detailed search of the plant.

B.7. **IF** suspicious item or bomb is located during the search, **THEN PERFORM** the following:

> **WARNIING**
> **INJURY AND DEATH can occur if a suspicious item is touched, moved, jarred, disturbed, or covered.**

a. **ISOLATE** the item.

b. **NOTE** the location, appearance, colors, wires, etc.

c. **CONTACT** civil authorities and management in person.

d. **AVOID** using two-way radios or intercoms.

> **NOTE**
> At any time during these actions, the Plant Manager or on shift CRO can order the shutdown of equipment and evacuation if, in his judgment, there are strong indications of an immediate serious threat to the plant and/or its personnel.

B.8. **IF** plant is evacuated at any point, **RETURN** after the police have declared the site safe.

B.9. **UPON** completion of the threat;

a. **ASSEMBLE** Management Team to critique handling of situation.

b. **COLLECT** Recommendations found in critique.

c. **INCORPORATE** recommendations for improvement into the policy.

d. **CONDUCT** re-training with necessary personnel.

C. **Communication**

C.1. **REPORT** the event to the police as soon as possible.

C.2. **PROVIDE** the police with the following information:

- Your name
- Your location and phone number
- A detailed account of the event
- **IF** the event is a threat received (via phone or other method), **THEN REPORT** the following:

    1. Name of the initial recipient
    2. Name of any employee threatened by the caller
    3. Normal work location of any threatened employee
    4. Time the bomb is supposed to explode/Sabotage event is to occur
    5. Exact location of the bomb or Sabotage device
    6. Outside appearance or description of the bomb or device

C.3. **ENSURE** plant operating personnel are aware of the sabotage event on your facility and any sabotage event that would affect larger portions of the Interconnection.

NOTE
Have all written records or notes of the threat available.

C.4. **WHEN** police arrive at the site, **THEN** Plant Manager (or designee) **BRIEFS** the police as to:

- Location of any emergency control valves or switches,
- Plant overall security status, and
- Any other information regarding the nature of the threat or event.

C.5. **REQUEST** Appropriate assistance from the police including site protection and personnel protection during evacuation.

C.6. **WHEN** the threat has been at least tentatively identified and controlled, **THEN** PERFORM the following:

a. **NOTIFY** the Plant Manager, the Owners Representative, and the NAES Headquarters Operations Director.

b. **REFERENCE** Applicable telephone numbers are listed below for quick access.

c. **UTILIZE** Additional contact information as necessary based on the circumstances of the event provided in Appendix F.

D. **Reporting**

It is essential that any incident involving a real or suspected threat of Sabotage be reported as soon as reasonably possible.

Distribution of this information should be initiated by the immediate submission of an Electrical Emergency Incident and Disturbance Report (Form OE-417) to the US Department of Energy according to the OE-417 Form instructions. (http://www.oe.netl.doe.gov/oe417.aspx)

The Form OE-417 consists of an Alert Notice (Schedule 1) and a Narrative Description (Schedule 2) which must be submitted within the time frames described below (and as specified in the top portion of the Alert Notice).

NOTE

NAES NERC procedure RCP-EOP-004-ATT-A contains reporting guidelines for reporting damage or destruction of the Facility that results from actual or suspected intentional human action, as well as any physical threats to the Facility excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility. Please refer to RCP-NERC-EOP-004-ATT-A for NERC Event Reporting guidelines for these instances.

⑨ TRAINING

A. All plant employees shall receive training on emergency response procedures on an annual basis.

B. All newly hired employees shall receive this training during orientation.

C. Contract employees must receive this training as integrated into the contractor orientation and training.

NOTE

In addition to the training, the appropriate number of radios shall be determined and issued to the Contractor Supervisor/Foreman.

D. All plant employees training must include at a minimum the following:

- Familiarization with this plan
- Any Hazmat Training that may be applicable
- The use of any firefighting equipment available
- Any special items or needs that may rise

E. All contract employees training must include the following:

- A general overview of this plan
- Any special items or needs that may arise during the course of their stay on-site

F. A written record must be maintained of all plant employees and contract employees who have received the training.

Attachments

SMP-02 Appendix A- Facility Evacuation Route Diagram

SMP-02 Appendix B- Bomb Threat Checklist

SMP-02 Appendix C- Suspected Bomb Sabotage Device Safety Precautions

SMP-02 Appendix D- Emergency Response Event Log

SMP-02 Appendix E- Emergency Response Call Record Form

SMP-02 Appendix F- Emergency Response Contact List

SMP-02 Appendix G – Emergency Facility Operations

SMP-02 Appendix H - Actions for Suspected Sabotage Events

SMP-02 Appendix I - On-Site Hazardous Chemicals

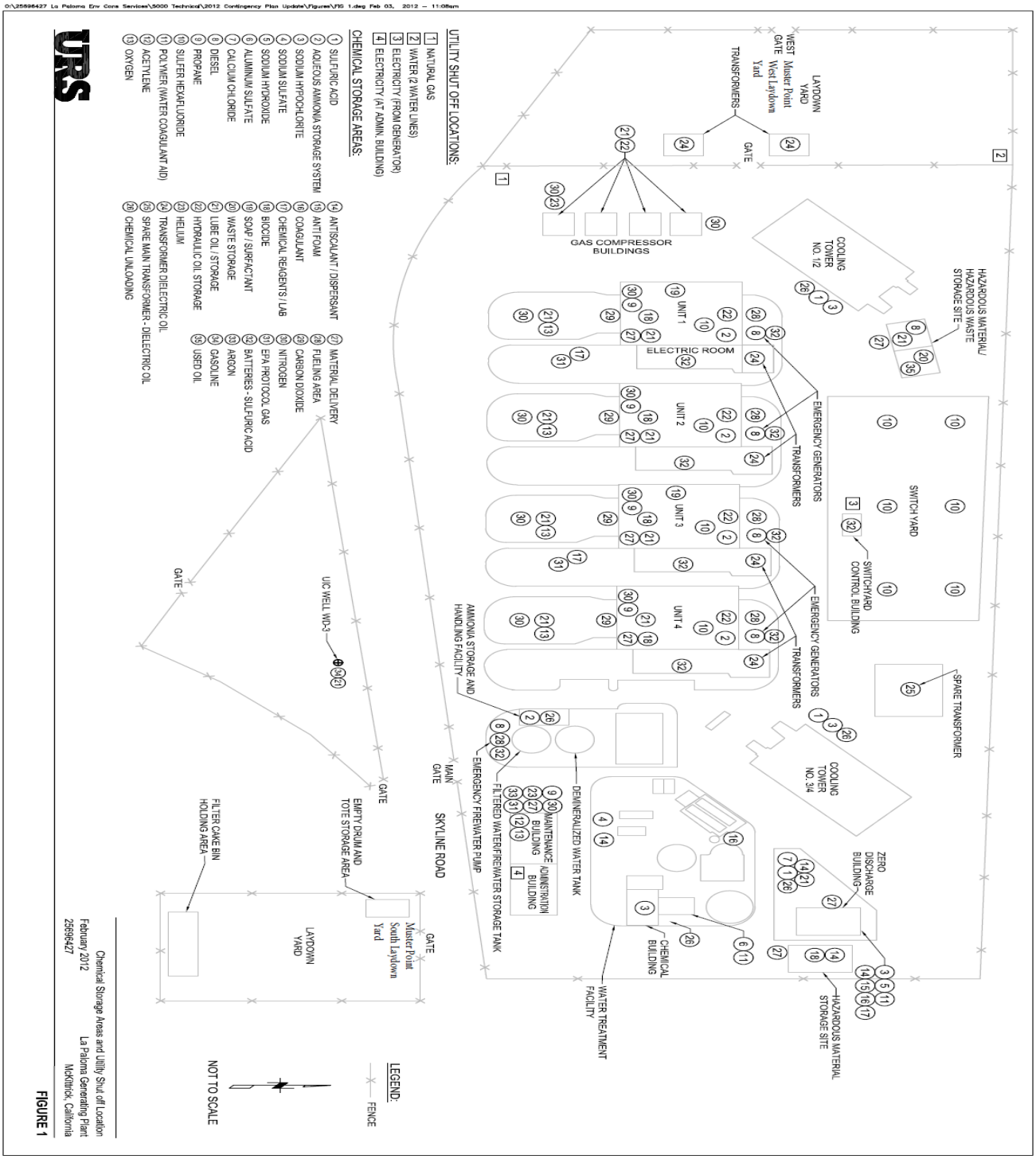
SMP-02 Table 1- Emergency Organizational Telephone Numbers for Threat Control (Appendix -F)

Revision Management

Revision History Log:

Revision #:	Date:	Nature of Change:	Recorded By:
R2	6/20/2023	Updated Appendix A – Facility Evacuation Route Diagram	Paul Sumal
R1	12/28/2022	Adopted for plant use	Paul Sumal
R0.1	5/27/2020 2:59 PM	Updated reference to Appendix H and SMP-14 Section #4 for details on reporting any accidental release (whether onsite or offsite) which results in a fatality, serious injury, or substantial property damage.	Alex Tan
R0	10/1/2019 7:22 PM	Final QC prior to Publication Conducted - Moved to R0 - Published to Portal	Bo Barker
D1.0	1/30/2019 10:52 AM	New document	Jason Gammon

Appendix A: Facility Evacuation Route Diagram



Appendix B: Bomb Threat Checklist

Instructions: Have someone else call police (911) and keep caller on the line. Listen; do not interrupt the caller except to ask:

1. When will it go off?_____
2. Where is it planted?_____
3. What floor is it on?_____
4. What kind of bomb is it?_____
5. What does it look like?_____
6. Why are you doing this?_____
7. Who are you?_____
8. Where are you?_____

Call received by:_____ Time of Call_____

Date_____ Time of Hang-up_____

Description of Caller: ☐ Male ☐ Female ☐ Adult ☐ Juvenile _____ App. Age

Voice Characteristics		Speech		Language	
☐ Loud	☐ Soft	☐ Fast	☐ Slow	☐ Excellent	☐ Good
☐ High Pitch	☐ Deep	☐ Distinct	☐ Distorted	☐ Fair	☐ Poor
☐ Pleasant	☐ Raspy	☐ Stutter	☐ Nasal	☐ Four	☐ Other
☐ Intoxicated		☐ Slurred	☐ Precise	Use of Certain Words or Phases:	
☐ Other		☐ Other			

Accent		Manner		Background Noises	
☐ Local	☐ Not Local	☐ Calm	☐ Angry	☐ Office	☐ Street
☐ Foreign	☐ Regional	☐ Rational	☐ Irrational	☐ Machines	☐ Traffic
☐ Race	☐ Other	☐ Coherent	☐ Incoherent	☐ Factory	☐ Airplanes
		☐ Deliberate	☐ Emotional	☐ Machines	☐ Trains
Explain:		☐ Righteous	☐ Laughing	☐ Bedlam	☐ Voices
				☐ Animals	☐ Music
		Is voice familiar? Sounds like		☐ Quiet	☐ Party
		_____		☐ Mixed	☐ Atmosphere

Action to take immediately after call:

1. Notify plant management.
2. Notify Owner's Representative.
3. Notify NAES Headquarters' Management.
4 Refer to RCP-NERC-EOP-004-ATT-A for NERC related reporting
5. Forward a copy of this to parties above ASAP.
6. Write exact statement or caller below:

_____

_____

Appendix C: Suspected Bomb/Sabotage Device Safety Precautions

The safety precautions below are designed to acquaint you with dangers inherent in the search, discovery, and handling of “suspected bombs” or “suspected Sabotage devices”.

While some of the following safety precautions may seem elementary, do not dismiss them as unimportant nor take them for granted, because adequate knowledge of these precautionary provisions may save your life or the lives of other plant operators and visitors.

1. Do not touch a suspected object.
2. Do not shake, shock, or jar a suspected Bomb/Device.

WARNING

The presence of nearby equipment/storage tanks that could present secondary hazards in the event of explosion or other Sabotage event.

3. Do not use radio equipment near the Bomb/Device to transmit messages.
4. Do not move light switches.
5. Do not smoke.
6. Do not accept the contents of any container as bona fide, simply because it was delivered by routine means.
7. Do not accept container markings and/or appearance as sole evidence of their contents’ identification and legitimacy.
8. Do not cover a suspected bomb/device.
9. Do not carry a suspected bomb/device.
10. Do not assume that a suspected bomb/device is of a specific (high explosive or incendiary) type.
11. Do not open any suspicious container or object.
12. Do not cut a string, cord, or wire on a suspicious container or object.
13. Do not cut or remove the wrapper on a suspicious object or container.
14. Do not unscrew the cover, move the latch or hook on the cover, or raise or remove the cover of a suspicious container.
15. Do not change the position of a suspicious container or object.
16. Do not place a suspicious container or object into water.

Appendix D: Emergency Response Event Log

Emergency Description:_____

_____

_____

Date and Time of Emergency:_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Note: Log all events associated with the emergency chronologically. Keep logs factual and concise.

Appendix E: Emergency Response Call Record Form

Emergency Description:_____

_____

Date and Time of Emergency:_____

Time	Company/Agency Notified	Company/Agency Contact	NAES HQ Contact

Description of Correspondence:

Time	Company/Agency Notified	Company/Agency Contact	NAES HQ Contact

Description of Correspondence:

Time	Company/Agency Notified	Company/Agency Contact	NAES HQ Contact

Description of Correspondence:

Appendix F: Emergency Response Contact List

Contacts should be made in the following order whenever possible. However, if contact cannot be made after two attempts, move on to the next level.

Event	Contact Title	Phone 1	Phone 2	Comment
Sabotage/Bomb Threat/Event	Local Emergency Services	911		
	Plant Manager	661-762-6002 office	661-203-9292 cell	
Significant Injuries/Incidents	CPUC	866-924-9757		
	Transmission Dispatcher	707-449-6720		
	FBI	661-323-9665		
Significant Spills/Incidents	Clear Environmental Resources	866-253-2703		

NOTE:

NERC RCP-EOP-004-ATT-A Table 2 – Plant Manager and Law Enforcement Contact Information is required to contain Local Law Enforcement contact information, Plant Manager contact information, and specific NERC reporting contacts. It is not necessary to maintain two separate contact lists if EOP-004-ATT-A is used by the facility.

Appendix G:

Emergency Facility Operations

Name of Facility Mercy Southwest Hospital

Hours of Operation 24 Hours

Phone 661-663-600 ask for ER

Address 400 Old River Road, Bakersfield, CA 93311

Directions:

1: Start going West on Skyline Road towards CA-33 / CA-58.

2: Turn RIGHT onto CA-33 / CA-58. Continue to follow CA-58.

3: Merge onto 1-5 South via the ramp on the LEFT.

4: Take the Stockdale Hwy exit toward Bakersfield. Stay on Stockdale Hwy.

5: Turn RIGHT on Old River Road.

6: Turn LEFT on Mercy Southwest Hospital Emergency Entrance.

Appendix H: Actions for Suspected Sabotage Events

All personnel should pay close attention to the events described in the table below. For all situations, perform the following actions along with the supplementary actions and then refer back to Section 9:

1. **Immediately contact the Plant Manager (or designee in his/her absence)**
2. **Ensure that all on duty personnel are alerted to the possibility of a sabotage event.**
3. **Document as many details about the situation as possible. Note times, events, and descriptions as applicable to the situation.**
4. **If appropriate, notify law enforcement and parties of the interconnection in accordance with Section 9C.**

Event	Event Definition	Supplementary Actions
Abnormal Behavior of Personnel	Persons with disgruntled, violent, or threatening behavior. Persons with a history of health or financial problems or any other reason that may cause odd behavior.	• Stay calm and don't aggravate the situation • If they are receptive, try to calm the person down. Explain that you wish to help.
Unfamiliar/Unescorted Visitors	Anyone who is on-site without permission and without an escort	• Provide escort to a secure area of the facility • Gather information as to the purpose of their visit
Unexplained Packages or Shipments	Any delivery with questionable labeling or from an unknown shipping company. Any package of suspicious origins that cannot be identified.	• DO NOT DISTURB THE OBJECT • Refer to Appendix C - Suspected Bomb/Sabotage Device Safety Precautions
Abandoned Vehicles	Vehicles on-site or near the facility that are not recognized and have no purpose being there	• Inquire as to the owner of the vehicle • Record a description of the vehicle and its license plate number
Abnormal Observations	Observation of any suspicious persons taking pictures and/or notes around the facility.	• Attempt to identify the person and their intent • Take note of identifying details about the person and their method of transportation.

Event	Event Definition	Supplementary Actions
Equipment Misuse/Abuse	Unauthorized changes to equipment that affect functionality or deliberate efforts to damage or destroy equipment.	• Coordinate with the Plant Manager and the Control Room to place the facility in a safe condition if the affected equipment cannot be isolated from the system. • Determine the extent of which the equipment was misused/abused
Attempted Intrusion (Physical)	A detected effort to gain unauthorized access of a person or a device through the physical perimeter but without obvious success.	• Inform all personnel of the event and conduct a search of the area for anything or anyone that appears to be suspicious. • Secure all sensitive plant areas through any available means
Attempted Intrusion (Cyber)	A detected effort to gain unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device but without obvious success.	• Record all activity that led you to determine the event was an attempted intrusion • Using an alternate means of communications (e.g. cell phone), contact appropriate entities listed on Appendix F – Emergency Response Contact List • For Critical Facilities, refer to facility CIP policies and procedures.
Cyber and/or Communication Disruptions	Failure, degradation of functionality, or unauthorized access or use of facilities used for the exchange of voice or data.	• Record details of any suspicious events that led up to the disruption • Using an alternate means of communications (e.g. cell phone), contact appropriate entities listed on Appendix F – Emergency Response Contact List • For Critical Facilities, refer to facility CIP policies and procedures.

Event	Event Definition	Supplementary Actions
Information Theft and/or Loss of Sensitive Plant Information	Unauthorized removal or loss of sensitive information.	• Record details about the theft including the last time you saw or used the data or documentation in question • Contact appropriate entities listed on Appendix F – Emergency Response Contact List • For Critical Facilities, refer to facility CIP policies and procedures.
Unauthorized Modification of Software or Data	Unauthorized addition or modification of software or data associated with the proper operation of cyber assets.	• Record details regarding the modification • Ensure any affected systems are in a safe condition and close the affected programs. • For Critical Facilities, refer to facility CIP policies and procedures.
Multiple breaker operations in your switchyard and adjacent Transmission Owners switchyard	Multi Site Sabotage	• Inform operating personnel • Have operating personnel inform others in the Interconnection. • Call FBI
Cyber systems for parties in the interconnection start showing equipment operation that has not physically occurred.	Multi Site Sabotage	• Inform operating personnel • Have operating personnel inform others in the Interconnection. • Call FBI

Appendix I: On-Site Hazardous Chemicals

Chemical Name, Description	Threshold Qty, Pure Product	Threshold Qty Solution in Use	Stored Qty On-site
Aqueous Ammonia (10-30% solution)	1,000 lbs.	461 gallons	42,000 gallons
Diesel Fuel Oil (No. 2 grade)	1,000 gallons	1,000 gallons	1,850 gallons
Drew 6134 (Sodium Bisulfate)	5,000 lbs	1091 gallons	1,500 gallons
Drewclean 2010 (Formic Acid)	5,000 lbs	2675 gallons	1,000 gallons
Drewtrol 7000 (Sodium Hydroxide)	1,000 lbs	679 gallons	1,000 gallons
Sulfuric Acid (93% solution)	1,000 lbs	70 gallons	7,100 gallons
Sodium Hydroxide (25% solution)	1,000 lbs.	375 gallons	1,000 gallons
Sodium Hypochlorite	100 lbs	82 gallons	20,000 gallons

Hazard Communication Program

Safety Manual Program (SMP)

Introduction

Purpose:

The purpose of this procedure is to protect workers from chemical source injuries and illness by ensuring that they are provided with sufficient information to anticipate, recognize, evaluate and control chemical hazards and take appropriate protective measures as required by the OSHA Hazard Communication Standard (29 CFR 1910.1200) in alignment with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

Scope:

All NAES Employees, All Site Personnel.

Description:

References

OSHA Regulations:

OSHA 29 CFR 1910.1200 - Hazard Communication

Responsibilities

1 PLANT MANAGER; DESIGNEE

The Plant Manager or designee is responsible for implementation of the program.

2 PLANT TEAM

The plant team will perform various Coordinator functions as directed by the Plant Manager or designee. These delegated functions will include one or more of the following Job Titles used throughout this Safety Manual:

- Safety Coordinator
- Hazard Communications Coordinator
- Contract Coordinator
- Emergency Coordinator
- Evacuation Coordinator

3 HAZARD COMMUNICATIONS COORDINATOR

The Hazard Communications Coordinator will have overall responsibility for coordination of the Hazard Communication Program.

- These include the written program, chemical information list, Safety Data Sheet (SDS) availability, labeling, employee information, and training.

4 CONTRACT COORDINATOR

The Contract Coordinator is responsible for obtaining information from the contractor regarding any hazardous materials that they may be using at the facility They are also responsible for providing information to the contractor regarding any hazardous materials they may be exposed to while working at the facility.

5 ALL EMPLOYEES & CONTRACTORS

Employees and Contractors will be expected to follow proper material handling procedures and use any required personal protective equipment appropriately They will read and follow labeling and warning instructions and immediately report any non-compliance situations to their Supervisor.

Policy

1 CHEMICAL INVENTORY

The Hazard Communication Coordinator will compile a list of all hazardous chemicals that are used at the worksite or stored on site. This Chemical Inventory List will be updated as necessary.

2 LABELING

A. It is NAES policy to **ENSURE** that each container of hazardous chemicals on a jobsite is properly labeled. The labels will list all of the following:

A.1. The contents of the container.

A.2. Appropriate hazard warnings.

A.3. The name and address of the manufacturer, importer, or other responsible party.

A.4. As chemical manufacturers become aligned with the GHS Classification and Labeling system, hazardous chemicals on the job site may also include:

- **Pictogram:** a symbol plus other graphic elements, such as a border, background pattern, or color that is intended to convey specific information about the hazards of a chemical.
  - Each pictogram consists of a different symbol on a white background within a red square frame set on a point (i.e. a red diamond).
  - There are nine pictograms under the GHS. However, only eight pictograms are required under the HCS. Pictograms are illustrated in Appendix A.
- **Signal words:** a single word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label.
  - The signal words used are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for less severe hazards.
- **Hazard Statement:** a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- **Precautionary Statement:** a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling of a hazardous chemical.

B. It is NAES policy to label all secondary containers to **ENSURE** that employees are aware of the chemical hazards of materials used in their work areas.

OSHA requires secondary container labels to have the full GHS label, or: "**Product Identifier"** and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical."

C. The National Fire Protection Association (NFPA) label standard will be the method used to show the hazardous properties of a substance as required.

- Labels will be displayed in prominent areas.

- Signs and placards may be used in lieu of labels on permanent stationary containers.

D. The NFPA Hazard Identification System identifies the hazards of materials in terms of three principal categories:

1. Health (Blue)
2. Flammability (Red)
3. Reactivity (Yellow)
4. Special Properties/Other Information (White)

E. The NFPA Hazard Identification System indicates the degree of severity by a numerical rating. The values of the rating range from four (4), indicating a severe hazard, to zero (0), indicating no hazard.

F. Plant management may decide to provide additional labeling consistent with information provided on the SDS to establish a uniform hazard recognition system throughout its facilities.

G. The purpose of labeling is to provide an immediate visual warning of the hazardous properties of a chemical substance, therefore; any existing or affixed labels, which do not remain legible for the useful life of the container, must be replaced.

③ SAFETY DATA SHEETS(SDS)

An SDS form provides summarized information about a particular chemical, chemical containing product, or mixture.

- The information relates the identity, physical properties, toxic, and hazard potential of a substance and describes precautions and safe work practices.
- Copies of the SDS for all hazardous chemicals to which employees may be exposed are kept at the facility and are readily accessible to employees in the work area.

NOTE

SDS forms for hazardous substances must be retained in the “inactive” set for 30 years beyond the date the substance was removed from the site (29 CFR 1910.1020).

There should be at least one complete set of “active” SDS forms maintained either electronically or in appropriately marked binders; commonly located in the Control Room. Wherever possible, a SDS will be affixed to its container in a waterproof document holder.

A. Each Safety Data Sheet (post June 1, 2015) must contain the following information to conform to OSHA regulations and GHS Classification:

1. Identification
2. Hazard(s) identification
3. Composition/information on ingredients
4. First-Aid measures
5. Fire-fighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information *
13. Disposal considerations *
14. Transport information *
15. Regulatory information *
16. Other information, including date of preparation or last revision

* OSHA will not be enforcing information requirements in sections 12 through 15, as these areas are not under its jurisdiction.

B. SDS shall be received at the site before the product is used or they shall be received at the time of initial use. The Plant shall establish a system that prevents the purchase of materials that would require an SDS without the approval of a designated individual.

C. If a SDS is not available for a product appearing on the Chemical Inventory, the Coordinator will make a formal request to the manufacturer or distributor.

④ TRADE SECRET PROTECTED SUBSTANCES

OSHA regulations provide that a chemical manufacturer may withhold the specific chemical identity of a product if a trade secret claim for the product was made and supported. When a physician or nurse determines that a medical emergency exists, the specific chemical identified is a hazardous substance, and the product information is needed for emergency or first aid treatment, then the manufacturer must immediately disclose the specific chemical identity to the physician or nurse, regardless of the existence of a confidentiality agreement.

⑤ CONTRACTORS

All contractors will be required to provide a SDS for all materials they propose to use while working at the site. The contractor is required to ensure all materials are adequately labeled upon their arrival at the site and throughout product use. The contractor is responsible for the proper use, storage and disposal of all materials brought on site.
Contractors and their employees may require information concerning the NAES Hazard

Communications Program and potential hazards that they may be exposed to while providing their services.

⑥ TRAINING

Each employee will receive information and training at the time of initial assignment, whenever a new hazard is introduced and annually thereafter. Normally, this training will be presented in a lecture/discussion format and videotapes may be used to augment the presentation when available. (29 CFR 1910.1200 (h)(1))
The information discussion topics must include the following (in accordance with 29 CFR 1910.1200 (h)(2)(i-iii)):

A. The hazard communication standard and associated requirements:

1. The hazard communication standard and the requirements of the standard.
2. The components of the hazard communication program in the employees' workplace.
3. Operations in work areas where hazardous chemicals are present.
4. Where the employer will keep the written hazard evaluation procedures, communications program, lists of hazardous chemicals, and the required SDS forms.

B. The training plan must consist of the following elements (in accordance with 29 CFR 1910.1200(h)(3)(i-iv)):

B.1. How the hazard communication program is implemented in that workplace, how to read and interpret information on labels and the SDS, and how employees can obtain and use the available hazard information.

B.2. The hazards of the chemicals in the work area. (The hazards may be discussed by individual chemical or by hazard categories such as flammability).

B.3. How to interpret and use the labels on the containers of hazardous materials.

a. Pictogram meaning.
b. Signal word relative level of severity of hazard.
c. Recognize hazard statement that describes nature of hazard.
d. Recognize precautionary statement to minimize or prevent adverse effects.

B.4. Measures employees can take to protect themselves from the hazards.

B.5. Specific procedures put into effect by the employer to provide protection such as engineering controls, work practices, and the use of personal protective equipment (PPE).

B.6. Methods and observations such as visual appearance or smell - workers can use to detect the presence of a hazardous chemical to which they may be exposed.

C. A record of each employee's information and training sessions will be documented and maintained in the plant personnel training records and documented on a Record of Training form.

Attachments

Site Specific (La Paloma) Considerations for SMP-08
SMP-08 Appendix A - Hazard Communication Standard Pictograms

Revision Management

Revision History Log:

Revision #:	Date:	Nature of Change:	Recorded By:
R0.1	9/15/2020 1:00 PM	Added Section 3.A., 3.B., and 3.C. with further clarification on SDS(Safety Data Sheets) requirements.	Alex Tan
R0	10/1/2019 7:36 PM	Final QC prior to Publication Conducted - Moved to R0 - Published to Portal	Bo Barker
D1.0	3/25/2019 11:07 AM	New document	Alex Tan

Site Specific (La Paloma) Considerations for SMP-08

Area specific warning:

B. Proposition 65 warnings concerning chemicals that pose cancer or reproductive hazard will also be made available for employee review in a binder near the M/SDS and Hazardous Substance Inventory Binder.

Section 1. Purpose
This procedure also addresses the Cal/OSHA Hazard Communication Standard (8 CCR 5194), which incorporates the Worker Right-to-Know Statute and Proposition 65.

Section 6. Safety Data Sheets
Proposition 65 warnings concerning chemicals that pose cancer or reproductive hazard will also be made available for employee review in a binder near the M/SDS and Hazardous Substance Inventory Binder.

Section 9. Training.
The information discussion topics must include the following (in accordance with 29 CFR 1910.1200 (h)(2) (i-iii), 8 CCR 5194):

Appendix A: Hazard Communication Standard Pictograms

Health Hazard  • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	**Flame**  • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	**Exclamation Mark**  • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non Mandatory)
Gas Cylinder  • Gases under Pressure	**Corrosion**  • Skin Corrosion/ burns • Eye Damage • Corrosive to Metals	**Exploding Bomb**  • Explosives • Self-Reactives • Organic Peroxides
Flame over Circle  • Oxidizers	**Environment (Non Mandatory)**  • Aquatic Toxicity	**Skull and Crossbones**  • Acute Toxicity (fatal or toxic)

Fire Prevention Plan

Safety Manual Program (SMP)

Introduction

Purpose:

The purpose of this procedure is to protect personnel and property from fire through fire prevention. This procedure defines general fire protection requirements and rules in OSHA 29 CFR 1910.38.

Site Specific Considerations for SMP-04:

Section 1. Purpose
This procedure defines general fire protection requirements and rules in 29 CFR 1910.38 and Cal/OSHA Title 8 Section 3221 Fire Prevention Plan..

Scope:

All NAES Employees, All Site Personnel

References

OSHA Regulations:

OSHA 29 CFR 1910.38 - Emergency Action Plans
OSHA 29 CFR 1910.39 - Fire Prevention Plans

Responsibilities

1 PLANT MANAGER OR PLANT MANAGER DESIGNEE

- Scheduling basic fire extinguisher use training.
- **ENSURE** each plant employee is trained on specific elements of this Fire Prevention Plan.
- Ensure that all equipment and systems installed to prevent or control ignitions and fires are properly maintained. This includes the portable fire extinguishers and both wet and dry fixed fire protection systems.

2 ALL EMPLOYEES

- **IDENTIFY** and **DOCUMENT** potential fire hazards in their day-to-day activities and inspections.
- **PERFORM** corrective actions as soon as possible. All employees not specifically trained in the proper operation of any fire protection equipment shall immediately go to a secure area per the Control Room Operator (CRO) instructions should a fire alarm sound.

Policy

1 GENERAL REQUIREMENTS

A. It is essential to control accumulations of flammable and combustible waste materials and residues through good housekeeping so that they do not contribute to a fire emergency at the plant.

A.1. Examples of effective steps in the minimization of fire risk:

- Prompt and proper disposal of debris,
- Prevention of scrap accumulation,
- Safe containment of used waste and wiping rags,
- Prevention of oil from soaking into thermal insulation and other coverings.

B. **USE** approved, covered safety cans for proper containment of waste solvents and waste oily rags.

C. After discharging a portable fire extinguisher for any reason, **REPORT** discharge to Supervisor.

D. **USE** matches and/or open flames in designated areas only.

E. **PREVENT** electrical sparks in Class I and Class II electrically classified areas (i.e. areas where combustible gas or combustible dusts may be present).

F. A Hot Work Permit (SMP-27, Hot Work) is required for any hot work activity outside of designated hot work areas in which the heat used or generated by the work is of sufficient intensity to potentially cause the ignition of any flammable or combustible matter (cutting, grinding, welding, open flame brazing or soldering, open flame heaters, or other spark generating activities).

Additional sources of ignition may be detailed in SMP-22 Combustible Gas Venting, Purging and Inerting.

G. **ENSURE** heating devices are kept a minimum of 6 feet away from combustible materials.

H. Employees shall only smoke in designated smoking areas.

I. **ENSURE** All employees are familiarized with the locations and proper use of the following:

I.1. Fire Protection Equipment.

I.2. Firefighting Equipment.

I.3. Emergency Eyewash and Safety Shower Stations.

I.4. First Aid Stations.

② FIRE PROTECTION RULES

The following rules concerning fire protection equipment will be observed:

A. Any time a portion of a plant fire system is removed from service or the system's ability to extinguish a fire is reduced, an Impairment Procedure (see Section 3 below) must be developed, approved, and implemented to compensate for the reduction in plant Fire Protection capability.

B. Tampering with fixed or portable fire extinguishing systems or devices or any fire warning system is prohibited.

C. Access to fire protection devices shall not be blocked. Should interference with access be temporarily unavoidable, the device shall be relocated.

D. Firefighting equipment (e.g. hoses installed in hose stations or on fire hose racks) shall not be used for any purpose other than firefighting or fire protection.

E. Any space in which the discharge of an extinguishing agent has the potential to create an IDLH atmosphere must not be entered until the space has been sufficiently ventilated and the atmosphere tested to ensure it no longer presents a hazard. The use of self-contained breathing apparatus (SCBA) by plant personnel is prohibited, therefore they may not be used by plant personnel to enter a space prior to sufficient ventilation. Emergency entry into these spaces shall only be performed by emergency responders or certified outside contractors.

F. Only carbon dioxide or dry chemical extinguishers shall be used on or around electrical equipment to prevent electrical shock.

G. Firefighting equipment must not be used for anything other than its intended purpose. When firefighting equipment is used, purposefully or accidentally, the user shall report it to their supervisor.

H. **INSPECT** All extinguishers monthly. **TAG** all inspected extinguishers showing maintenance and recharging date(s).

③ IMPAIRMENT PROCEDURES

The following rules apply any time a portion of the fire protection system is taken out of service. Under planned impairment, this procedure must be completed before hand. If due to emergency (equipment failure), this procedure must be completed as soon as possible:

A. Plant Manager must **APPROVE** any maintenance or repair activities that require any part of the fire protection system to be taken out of the service.

A.1. **TAKE** Steps to **ENSURE** all operations and maintenance personnel are aware of any impairment of the fire protection system.

A.2. **RETURN** the fire protection system to service as soon as possible.

B. **OPERATE** the combustion turbine or similar critical plant equipment **ONLY** when the fire protection system is on-line and working properly unless specified by an approved procedure and then only with the Plant Manager's approval.

C. **WHEN** normal fire protection is not available:

C.1. **NOTIFY** local fire department and plant insurance carrier of reduced firefighting capability at the site.

C.2. **THEN PLACE** an equivalent protection system in service such as:

- Fire watch
- Extra fire extinguishers
- Secondary water supply such as a water truck or other suitable supply

D. **DURING** impairment, **ENSURE** increased risks of fire hazards are minimized by prohibiting the following:

D.1. Non-Emergency Hot Work.

D.2. Use of gas-powered heating devices.

NOTE
In the absence of a specific designee, the Plant Manager shall be considered the Impairment Coordinator.

E. **WHEN** necessary, **THEN** Plant Manager **ASSIGNS** an Impairment Coordinator to **ENSURE** compliance with the impairment procedure and with the requirements of the applicable OSHA regulations, NFPA national consensus standards, and local fire jurisdiction.

F. **POST** Out of Service tags at each fire department connection and system control valve which has been removed from service.

G. **Impaired Equipment**

Impaired Equipment is defined as all or any part of a fire protection system that is not meeting normal availability requirements. Equipment with the potential of being impaired includes, but is not limited to, the following:

- Sprinkler systems
- Fire hose systems
- Underground fire service mains
- Fire pumps
- Water storage tanks
- Water spray fixed systems
- Fire service control valves
- Fire detection systems
- Fixed Fire Protection System

H. Plant Manager must **AUTHORIZE** all pre-planned Impairments.

I. Before authorization is given, a designated Impairment Coordinator will **VERIFY** the following procedures have been implemented:

I.1. Extent and expected duration of the impairment has been determined.

I.2. Areas or buildings involved inspected and increased risks determined.

I.3. Recommendations submitted to Plant Manager by Impairment Coordinator.

I.4. Where a required fire protection system is out of service, the Impairment Coordinator will **ARRANGE** for any of the following steps that are deemed necessary:

- Removal of personnel or limiting access to the building or portion of the building affected by the system out of service
- Assigning a fire watch
- Establishment of a temporary water supply
- Establishment and implementation of an approved program to eliminate potential ignition sources and limit the amount of fuel available to the fire
- Posting of appropriate “Out of Service” tags
- Staging of all necessary tools and materials

J. Plant Manager or designee **DEVELOPS** a Fire Impairment Notification Form (Appendix A) that INCLUDES the following notifications:

J.1. **NOTIFY** by email the NAES Operation Director and Corporate Safety Manager when fire impairment is in effect beyond the end of the shift.

J.2. **IDENTIFY** when to notify the appropriate Owner/Owner’s Representatives and appropriate contact.

J.3. **IDENTIFY** when to notify the appropriate State and Local Fire Services and appropriate contact.

J.4. **IDENTIFY** when to notify the appropriate Insurance Carrier and appropriate contact.

J.5. **NOTIFY plant personnel and IDENTIFY** the method for continued notification of plant personnel when fire impairment is in effect beyond a single shift.

K. Emergency impairments include, but are not limited to:

- System Leakage
- Interruption of Water Supply
- Frozen Piping
- Ruptured Piping
- Equipment Failure

L. **WHEN** all impaired equipment is restored to normal working order, the Impairment Coordinator **VERIFIES** the following procedures have been implemented:

L.1. Using NFPA 25 for guidance, **CONDUCT** necessary inspections and tests to **VERIFY** affected systems are operational.

NOTE
NFPA 25 provides guidance on the types inspection and tests required.

L.2. **ADVISE** the following parties that fire protection has been restored:

- Plant Manager
- Plant Management (i.e. Operations Manager, Supervisors, etc.)
- Local Fire Department
- Insurance Carrier
- Local Authorities Having Jurisdiction

L.3. **REMOVE** Applicable “Out of Service” tags.

M. A trained fire watch **PERIODICALLY PATROLS** affected areas.

- **ENSURE** Fire Protection Features are available and functioning properly.

④ TRAINING

A. **UPON** initial hire, **TRAIN** all employees on plant fire protection plans.

A.1. Training covers all aspects of this program,

a. Any other plant-specific fire plans,

b. Location of all fire protection equipment,

c. Proper emergency response procedures.

B. **UPON** initial hire and annually thereafter, **PROVIDE** training to all employees on use of portable fire extinguishers.

C. **PROVIDE** appropriate training to plant employees who inspect, maintain, and repair fixed extinguishing systems.

⑤ SITE SPECIFIC INSPECTIONS & MAINTENANCE

A. **INSPECT** Fire Protection System following preventive maintenance items scheduled in the plant CMMS.

B. Plant **CREATES** inspection program to include all fire prevention equipment, including, but not limited to:

- Fire Extinguishers
- Monitors
- Fire Alarms
- Smoke Detectors

C. **VISUALLY INSPECT** fire extinguishers monthly in accordance with *SMP-6 Inspections & Assessments.*

D. **PERFORM** fire extinguisher annual maintenance check in accordance with *SMP-6 Inspections & Assessments.*

Attachments

STD-SMP-04 Appendix A - Fire Impairment Notification Form

Revision Management

Revision History Log:

Revision #:	Date:	Nature of Change:	Recorded By:
R0.2	4/30/2021 11:59 AM	Added reference OSHA 29 CFR 1910.39 - Fire Prevention Plans, corrected minor typos.	Alex Tan
R0.1	9/15/2020 1:09 PM	Minor adjustment on language to add clarity. Updated Appendix A.	Alex Tan
R0	10/1/2019 7:31 PM	Final QC prior to Publication Conducted - Moved to R0 - Published to Portal	Bo Barker
D1.0	2/5/2019 1:26 PM	New document	Alex Tan

NAES Fire Impairment Notification Form

Appendix A

*To Report a Fire Impairment use email. Call All Others.

Contract Person / Email Address

Plant Manager_____/_____
Ops Manager_____/_____
Safety Coordinator_____/_____
*NAES Operation Director_____/_____
*NAES Corp Safety Manager _____/_____
*Owner/Owners Rep _____/_____
*Insurance Carrier_____/_____
*State & Local Regulators_____/_____
*All Site Personnel
Other_____/ _____

Insurance Carrier / Policy Number:	
Local Fire Department Tel #:	
Reported By:	
Fire Protection Impairment #:	
Name of Person Requesting Impairment:	
Facility Name/Address/ Ph #:	
Type of Impairment: ☐ Planned ☐ Unplanned	
Type of System Impaired:	
Impairment Area(s) System:	
Equipment Affected/Protected:	
Reason for Impairment: ☐ Maintenance ☐ Repairs ☐Modification ☐Emergency/failure	Time of Impairment:
Date of Impairment:	
Expected Length of Impairment:	
Explanation of Impairment:	
Restoration of Impairment	Time of Restoration:
Date of Restoration	
Date and Time Restoration reported	
Name of Person reporting Restoration: Print and Sign:	
Title:	Phone Number:

Precautions Taken (check all that apply):

☐ Work to be expedited	☐ Continuous work authorized
☐ Hazards reduced	☐ Cutting/welding/hot work prohibited
☐ Smoking prohibited	☐ Hazardous processes shut down
☐ No flammable liquids in use in area	☐ Continuous fire watch in affected areas
☐ Watchman tours increased to 4 hours	☐ Brigade & Public fire department notified
☐ Extra extinguishers available	☐ Combustibles removed from the area
☐ Fire hose available	☐ Additional Notes:

ADDITIONAL INFORMATION:

ATTACHMENT G

HAZARDOUS MATERIALS USED IN REPORTABLE QUANTITIES

Hazardous materials used in reportable quantities (RO) are listed as follows:

Chemical	RO (lb)
Nitrogen Oxide	10
Sodium Hypochlorite	100
Ammonium Hydroxide	1,000
Sodium Hydroxide	1,000
Sulfuric Acid	1,000
Aluminum Sulfate	5,000
Sodium Bisulfite	5,000

ATTACHMENT H

BIOLOGY – ANNUAL COMPLIANCE REPORT

La Paloma
Generating Plant
CXA La Paloma, LLC

POB175 (Mail)
1760 W. Skyline Road
(Deliveries)
McKittrick, CA 93251
661.762.6000
661.762.6041 Fax

January 26, 2024

Ms. Susan Jones
USFWS
2800 Cottage Way, W-2605
Sacramento, CA 95825

Mr. Larry Saslaw
Bureau of Land Management
3801 Pegasus Drive
Bakersfield, CA 93308-6837

Ms. Laura Peterson Diaz
CDFW Region 4
1234 East Shaw
Fresno, CA 93710

Subject: **La Paloma Generating Plant**
Designated Biologist's Annual Compliance Report: 2023
Federal File No. 98F0183
CEC Docket No. 98-AFC-2

Dear Ms. Jones, Ms. Diaz, and Mr. Saslaw:

Pursuant to BRMIMP Condition 6.3 enclosed is the Designated Biologist's 2023 Annual Compliance Report for the La Paloma Generating Plant. The report is based on quarterly or as-needed inspections and reports by the Designated Biologist (Adam Grimes) of Mesa Biological, LLC. This report is also submitted to the California Energy Commission as a component of the 2023 Annual Compliance Report.

If you have questions regarding the report, please contact Adam Grimes at 661.209.0027 or Paul Sumal at 661.762.6055.

Sincerely,

Terry Benson
Plant Manager
La Paloma Generating Plant

cc: w/enclosure P. Sumal A. Grimes
w/o enclosure A. Guiterrez - CEC
pdf w/enclosure J. Scott F. Schneider

File No. 705.03.04

2023 ANNUAL COMPLIANCE REPORT FOR THE CXA LA PALOMA, LLC. KERN COUNTY, CA

Prepared for: CXA La Paloma, LLC
1760 West Skyline Road
McKittrick, CA 93251

Date: January 12, 2023

Table of Contents

Annual Compliance Report: 2023

This annual compliance report is prepared to correspond the performance of biological mitigation measures for the CXA La Paloma, LLC and its associated facilities to the California Energy Commission (CEC), the California Department of Fish and Wildlife (CDFW), the U.S. Bureau of Land Management (BLM), and the U.S. Fish and Wildlife Service (USFWS). Environmental compliance monitors have a responsibility to annually report to CDFW, BLM, and USFWS.

Information contained in this report includes the time CXA La Paloma activities occurred, a discussion of the implementation of the required mitigation measures, impacts of CXA La Paloma on sensitive species habitat and individual animals, a discussion of the effectiveness of mitigation measures, and recommendations.

I. Compliance Activities and Reporting

Compliance activities in 2023 included routine operation and maintenance of CXA La Paloma, and Underground Injection Control (UIC) Well Program activities.

Compliance activities are covered and required by the CEC (CEC 1999), the USFWS Biological Opinion (USFWS 1999), and the CDFW Section 2081(b) Permit (CDFW, formerly CDFG 1999). Reporting and Implementation requirements are discussed in the Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP) (Toyon 2005a). The BRMIMP was revised in 2005 to reflect the completion of construction activities and final habitat mitigation. Other mitigation measures address habitat compensation and reporting.

A. CXA La Paloma Compliance Activities

Worker environmental awareness training classes are conducted for new-hire staff and contract personnel and annually for all CXA La Paloma staff and returning contract personnel. The quarterly inspections were conducted on February 28, June 14, September 18, and December 1, 2023.

No sensitive species were identified or injured during the compliance activities.

B. Reporting
There was no reclamation related reporting in 2023. Reclamation and monitoring activities were completed for CXA La Paloma (Toyon 2004 and Toyon 2005b) prior to 2009.

The 2022 Designated Biologist's Annual Compliance Report was submitted in January 2023.

II. Impacts to Sensitive Species and Habitat
The mitigation measures implemented for the CXA La Paloma were successful at reducing and/or eliminating impacts to sensitive species and their associated habitats.

A. Impacts to Sensitive Plants
No impacts to sensitive plants in 2023 were reported at CXA La Paloma. Activities in 2023 did not result in disturbance to any occupied sensitive plant habitat and no sensitive plant species were impacted, including California jewelflower (*Caulanthus californicus*) and Kern mallow (*Eremalche kernensis*).

B. Impacts to Sensitive Wildlife Resources
Sign or direct observation of several bird species protected under the Migratory Bird Treaty Act (MBTA), including red tail hawk (*Buteo jamaicensis*), and white crowned sparrow (*Zonotrichia leucophrys*) occurred during the 2023-reporting year. However, none of these species were or are expected in the future to be directly impacted by CXA La Paloma operations.

Other threatened or endangered species previously documented in the area of CXA La Paloma operations but not observed during 2023 include San Joaquin kit fox (*Vulpes macrotis mutica*), Tipton kangaroo rat (*Dipodomys nitratoides nitratoides*), giant kangaroo rat (*Dipodomys ingens*), blunt-nosed leopard lizard (Gambelia sila), and Buena Vista lake shrew (*Sorex ornatus relictus*). As these species were not observed during 2023, it is unlikely they were significantly affected by CXA La Paloma operations. Furthermore, even if they did occur on

site, mitigation measures such as proper training of all personnel and avoidance of these species should prevent significant effects. There was no documented mortality or injury of listed species during 2023 from CXA La Paloma activities.

C. Impacts on Habitat
CXA La Paloma activities in 2023 did not result in disturbance to occupied sensitive wildlife habitat and no sensitive wildlife species were consequently impacted.

D. Impacts to Other Wildlife Resources
No mammal species were observed within the plant site during quarterly site inspections. Reptiles observed included western whiptail (*Aspidocelis tigris*) and side blotched lizard (*Uta stansburiana*). Bird species identified within the plant site included western meadowlark (*Sternella neglecta*), house finch (*Carpodacus mexicanu*s), rock dove *(Columba livia),* common raven *(Corvus corax),* house sparrow (*Passer domesticus*), European starling (*Sturnus vulgaris*), black phoebe (*Sayornis nigricans*), western kingbird (*Tyrannus verticalis*), mourning dove (*Zenaida macroura*), loggerhead shrike (*Lanius ludovicianus*), red tail hawk (*Buteo jamaicensis*) and white- crowned sparrow (*Zonotrichia leucophrys*).

No nesting activities were observed within the plant site during 2023.

III. Effectiveness of the Mitigation Measures, Problems, and Suggestions

Mitigation measures for CXA La Paloma as a whole fall into three major categories:

- measures to minimize and avoid take of sensitive species,
- a worker environmental education program, and
- compensation for unavoidable impacts.

A. Mitigation Measures
Effectiveness of the measures was discussed thoroughly in the 2003 Annual Report (Toyon 2003a) and that assessment is unchanged. The mitigation measures implemented for CXA La Paloma were adequate

to reduce or eliminate the incidental take of sensitive species and the loss of habitat was minimized to the extent practical. Mitigation measures that were implemented were effective at protecting sensitive species or their resources.

1. Fencing at Power Plant Site

A chain-link fence, including a wildlife exclusion barrier installed along its base, has been erected at the power plant site. The wildlife exclusion barrier reaches 24 inches above ground and is buried to a depth of 18 inches. Vegetation has been adequately suppressed along the outside of the perimeter fence so that small animals cannot climb above the barrier and into the plant. Maintenance of the fasteners, rivets, and tears on exclusion fencing is on going.

B. Worker Environmental Awareness Training

A total of 228 CXA La Paloma personnel and contractors partook in Worker Environmental Awareness Training (WEAT) that covered environmental compliance requirements. All CXA La Paloma personnel received training and also received annual refresher training. There were no incident reports issued during 2023.

C. Compensation

CXA La Paloma compensation is considered in the Post-construction Disturbance Analysis (Toyon 2003b).

D. Recommendations

No changes are recommended to the mitigation measures that are being implemented. The mitigation measures appear to be sufficient to minimize and avoid take of sensitive species.

IV. References Cited

California Department of Fish and Wildlife (CDFW). 1999. Incidental Take Permit No. 2081-1999-028-4 La Paloma Generating Company, L.L.C. La Paloma Generating Project. Executed December 13,1999.

California Energy Commission (CEC). 1999. Commission Decision on the La Paloma Generating Project Application for Certification. Docket No. 98-AFC-2. 235 pp + 4 apps.

Toyon Environmental Consultants, Inc. 2005a. Biological Resource Mitigation and Implementation Monitoring Plan (BRMIMP): La Paloma Generating Plant. Unpubl. Report prepared for La Paloma Generating Co., LLC. 46 pp + app.

Toyon Environmental Consultants, Inc. 2005b. Assessment of Reclamation on Chevron Land: 2005. Unpublished draft report prepared for La Paloma Generating Company, LLC and submitted to California Energy Commission, Sacramento. 30 pp + app.

Toyon Environmental Consultants, Inc. 2005. La Paloma Generating Project biological compliance reporting: Annual Report 2004. Unpublished report prepared for La Paloma Generating Company, LLC and submitted to California Energy Commission, Sacramento; U.S. Bureau of Land Management, Bakersfield; U.S. Fish and Wildlife Service, Sacramento; and California Dept. of Fish and Game, Fresno. 6 pp.

Toyon Environmental Consultants, Inc. 2003. La Paloma Generating Project biological compliance monitoring: Annual Report 2002. Unpublished report prepared for La Paloma Generating Company, LLC and submitted to California Energy Commission, Sacramento; U.S. Bureau of Land Management, Bakersfield; U.S. Fish and Wildlife Service, Sacramento; and California Dept. of Fish and Game, Fresno. 10 pp.

Toyon Environmental Consultants, Inc. 2003. La Paloma Generating Project biology compliance reports: Post-construction Disturbance

Analysis, June 2003. Unpublished report prepared for La Paloma Generating Company, LLC and submitted to California Energy

IV. References Cited (continued)

Commission, Sacramento; U.S. Bureau of Land Management, Bakersfield; U.S. Fish and Wildlife Service, Sacramento; and California Dept. of Fish and Game, Fresno. 19 pp + 3 appendices of maps/aerial photos.

U. S. Fish and Wildlife Service, 1999, Biological Opinion for the La Paloma Generating Plant. Prepared by U. S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office in consultation with U. S. Bureau of Land Management, Bakersfield Field Office. June 24, 1999. 59 pp + app.