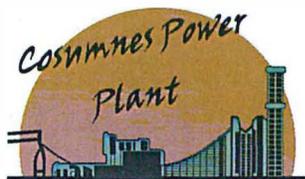


**DOCKETED**

<b>Docket Number:</b>	01-AFC-19C
<b>Project Title:</b>	SMUD Cosumnes Power Plant - Compliance
<b>TN #:</b>	255303
<b>Document Title:</b>	2023 Annual Compliance Report for Cosumnes
<b>Description:</b>	2023 ACR for Cosumnes Power Plant
<b>Filer:</b>	Ashley Gutierrez
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	3/27/2024 3:10:09 PM
<b>Docketed Date:</b>	3/27/2024



14295A Clay East Road  
Herald, CA 95638

209-748-5177 (main)  
209-748-5178 (fax)

February 20, 2024

Ashley Gutierrez  
Compliance Project Manager  
California Energy Commission  
1516 9th Street, MS-2000  
Sacramento, California 95814-5512

Re: 2023 Annual Compliance Report (ACR)  
Cosumnes Power Plant  
CEC Docket Number 01-AFC-19C

Ms. Gutierrez,

Pursuant to CEC Application for Certification (01-AFC-19C) requirements, the 2023 Annual Compliance Report for the Cosumnes Power Plant has been submitted to you as a pdf email attachment.

The following information is included in the Annual Compliance Report:

<b>AQ-22</b>	Road repairs	<b>VIS- 5</b>	Lighting complaints
<b>AQ-19</b>	Air quality reports	Plume-1	Cooling tower operation
<b>BIO-19</b>	Mitigation measures	Waste- 3	Waste management
<b>BIO-2</b>	Summary of biological activities	Water Quality - 7	ZLD operation report
<b>BIO- 5</b>	Mitigation implementation	Water RES - 1	Water usage
<b>HAZ-1</b>	Hazardous chemicals list	<b>GEN-8</b>	Final approved engineering plans
<b>VIS-2</b>	Painting and maintenance	<b>COM-7</b>	Annual Compliance Report contents

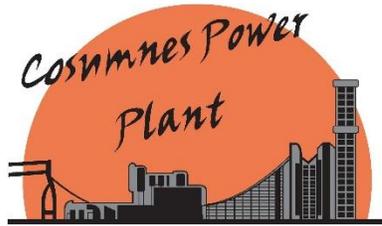
I certify based on information and belief formed after reasonable inquiry, that the statements and information in this document and supplements are true, accurate and complete. Should you have any questions, please do not hesitate to call me at 209-748-5179.

Best Regards,

Eddie McCormick  
Facility Manager  
209-748-5177 x302 (O)  
760-382-0847 (C)

Cc via email:

Pedro Juarez, SMUD  
Rene' Toledo, SMUD  
Randall Blank, EthosEnergy PPS



*Cosumnes Power Plant, Herald, CA*

## **2023 Annual Compliance Report**

**California Energy Commission**



*Submitted by: EthosEnergy Power Plant Services (EE PPS)*

*On behalf of: Sacramento Municipal Utility District Financing  
Authority*

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4	Introduction	-	Summary of report contents and identification of compliance period.	-
5	A	AQ -22	Pictures of roads required by Sacramento Municipal Air Quality Management District ERC application 00767-00769, 00772-00775.	Attachment A
12	B	AQ -19	Air Quality Reports Summary 2023Q1, 2023Q2, 2023Q3, 2023Q4 Reports.	Attachment B
17	C	Bio -19	Status of mitigation measure implementation.	Attachment C
18	D	Bio -2	Summary of biological activities.	Attachment D
19	E	Bio -5	Report of Mitigation implementation.	All mitigation measures have been completed. Attachment E
20	F	Haz -1	CPP list of hazardous chemicals.	Attachment F
49	Appendix C	Vis -2	Surface treatment of project structures and buildings.	All structures are properly treated with CEC approved color. Surfaces painted as required.
		Vis -5	Lighting complaints and resolution.	No lighting complaints were received during 2023.
		Plume -1	Cooling tower operated so that the plume frequency will not increase from the design as certified. There were no cooling tower design changes in 2023.	Cooling tower operations satisfied limits specified in Plume-1 during 2023. There were no complaints filed over cooling tower plume.
		Waste -3	Actual waste management methods used during the year compared to planned management methods.	2023 waste management operations did follow the waste management plan. Attachment K
21	G	Water Quality -7	Status report on operation of the ZLD, including disruptions, maintenance, volumes of interim wastewater streams stored on site, volumes of residual salt cake generated and landfills used for disposal.	Attachment G

<u>Page</u>	<u>Attachment</u>	<u>Condition</u>	<u>Description</u>	<u>Summary of Compliance Conditions</u>
23	H	Water Res -1	Submit a water use summary, 2,663 AFY (over any 3 successive calendar years) shall not be exceeded.	Attachment H
		Gen -8	Storage of final approved engineering plans, specifications, and calculations.	Available at CPP and any district computer terminal.
24	I	Com -7	Annual Compliance Report required contents.	Attachment I
27	J	Com -7	Annual Compliance Matrix.	Attachment J
38	K	Waste -3	Waste Management Methods	Attachment K
40	Appendix A	Water Quality -7	2022-2023 Annual Report for Storm Water Discharges	Appendix A
48	Appendix B	Water Quality -7	Vacuum Truck – disposal of water and sludge loads	Appendix B

## Annual Compliance Report - Introduction

CEC Docket 01-AFC-19, condition COM-7 requires that the Consumes Power Plant (CPP) submit an Annual Compliance Report for the 2023 Compliance Period. Per COM-7 the following information is included in this report:

1. An updated compliance matrix which shows the status of all conditions of certification (fully satisfied and/or closed conditions do not need to be included in the matrix after they have been reported as closed);
2. A summary of the current project operating status and an explanation of any significant changes to facility operations during the year;
3. Documents required by specific conditions to be submitted along with the Annual Compliance Report. Each of these items must be identified in the transmittal letter, and should be submitted as attachments to the Annual Compliance Report;
4. A cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM;
5. An explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided;
6. A listing of filings made to, or permits issued by, other governmental agencies during the year;
7. A projection of project compliance activities scheduled during the next year;
8. A listing of the year's additions to the on-site compliance file;
9. An evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date; and
10. A listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved complaints, and the status of any unresolved complaints.

## Attachment A: AQ-43 Pictures of Roads for SMAQMD ERC

AQ-43 - SMUD shall ensure that the paved roads described in SMAQMD ERC applications 00767-00769, 00772-00775 are properly maintained and repaired. All of the roads were found to be in good condition, and are being properly maintained and repaired. The following pictures illustrate the condition of the roadways as of February 6, 2024.

District ERC application 00767 – The pavement was in good condition.



District ERC application 00768 – The pavement was in good condition.



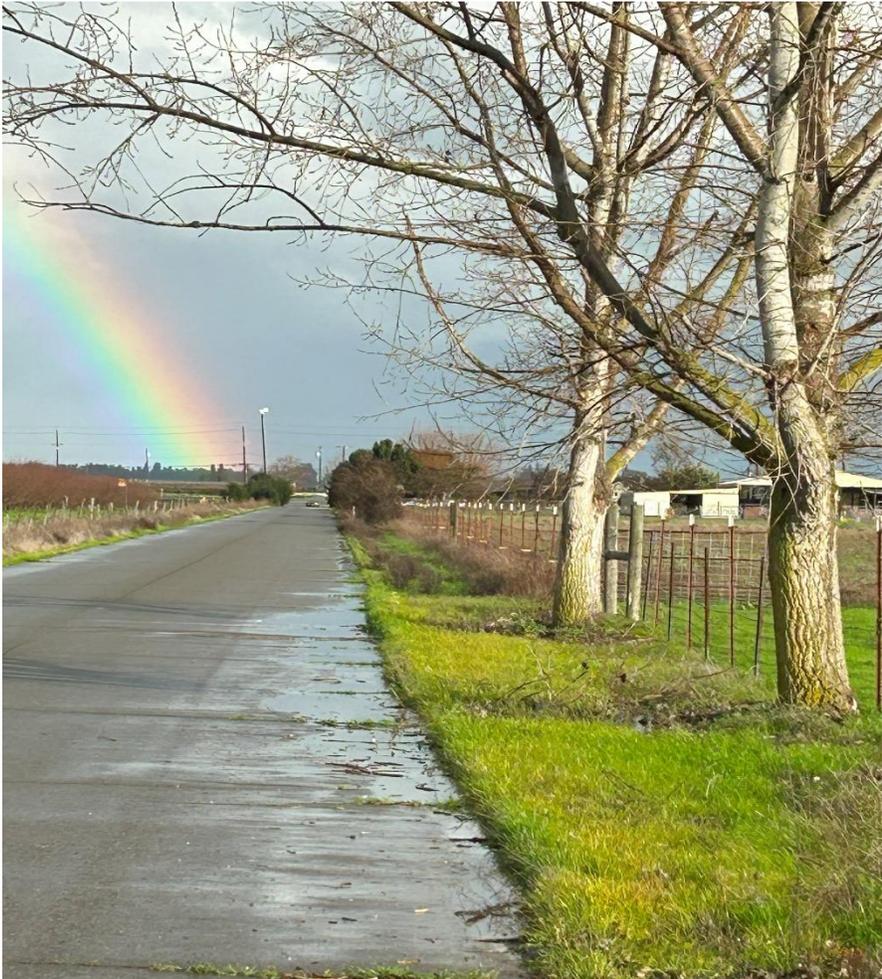
District ERC application 00769– The pavement was in good condition.



District ERC application 00772 – The pavement was in good condition.



District ERC application 00773 – The pavement was in good condition.



District ERC application 00774 – The pavement was in good condition.



District ERC application 00775 – The pavement was in good condition.



## Attachment B

### AQ-19 Air Quality Annual Report Summary

<u>Condition</u>	<u>Description</u>	<u>2023 Annual Status</u>			
		<u>2023Q1</u>	<u>2023Q2</u>	<u>2023Q3</u>	<u>2023Q4</u>
AQ-1, AQ-3, AQ-18, AQ-19, AQ-33	Record of Emissions Monitoring Equipment operational status	Fully Operational	Fully Operational	Fully Operational	Fully Operational
AQ-6	Record of compliance with daily visible emissions	No visible emissions	No visible emissions	No visible emissions	No visible emissions
AQ-7, AQ-8	Exceedance of <i>hourly CTG mass emission rates</i> : hourly or 3-hour averaged records of Ammonia, NOx, CO, VOC, SOx, and PM10/2.5 (including 3-hour Bag house limit from the Title V "TV" PTO).	No exceedances	No exceedances	No exceedances	No exceedances
AQ-25	Exceedance of <i>3-hour averaged Cooling Tower TDS rates</i>	No exceedances	No exceedances	No exceedances	No exceedances
AQ-9	Exceedance of <i>daily CTG, Bag House (TV PTO) and Cooling Tower emission rate</i> : daily exceedance records of NOx, CO, VOC, SOx, and PM10/2.5.	No exceedances	No exceedances	No exceedances	No exceedances
AQ-10	Quarterly CTG cumulative emissions: records of NOx, CO, VOC, SOx, and PM10/2.5 (including Bag House per TV PTO). Combined emissions of both gas turbine generators and cooling tower (PM-10)	Reported in Attachment B.2.			
AQ-14	Exceedance of start-up, shut-down or short term excursion limits	No exceedances	No exceedances	No exceedances	No exceedances

## **Attachment B.1**

**Record of Emissions Monitoring Equipment operational status.**

**&**

**Record of Exceedance Event**

All Continuous Emission's Monitoring equipment was fully operational for 2023 and there were no exceedance events.

## Attachment B.2

Quarterly CTG cumulative emissions: Records of NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM<sub>10/2.5</sub>. Combined emissions of both gas turbine generators, perlite storage silo dust and cooling tower (PM-10) – as permitted in PTO Nos. 25800, 25801 and Interim / Regular Variance Petition No. 2022-001 and -002 (granted for one year beginning August 16, 2022).

### Annual Cumulative Emissions 2023

#### Carbon Monoxide (CO) pounds

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit (tons)	
Jan	0	0		0		
Feb	2181	2181		147,929		2181
Mar	436	2617				2617
Apr	1085	1085	3702			
May	1014	2099	148,687	4716		
Jun	469	2568		5185		
Jul	52	52		5237		
Aug	383	435	149,444	5620		
Sep	329	764		5949		
Oct	147	147		6096		
Nov	551	698	149,444	6647		
Dec	101	799		6748		123.1

#### Oxides of Nitrogen (NO<sub>x</sub>) pounds

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit (tons)	
Jan	0	0		0		
Feb	1332	1332		62,021		1332
Mar	14395	15727				15727
Apr	3225	3225	18952			
May	6425	9650	62,643	25377		
Jun	7559	17209		32936		
Jul	14438	14438		47374		
Aug	12667	27105	63,265	60041		
Sep	12943	40048		72984		
Oct	13406	13406		86390		
Nov	10323	23729	63,265	96713		
Dec	16189	39918		112902		96.0

**Particulate Matter (PM-10) pounds (Perlite PM for 2023 is 0.292 pounds)**  
 [Limits are per the SMAQMD PTOs. PM2.5 is 0.998 of PM10]

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit (tons)
Jan	0	0	39,725	0	80.6
Feb	197	197		197	
Mar	10869	11066		11066	
Apr	2408	2408	40,167	13474	
May	5672	8080		19146	
Jun	6393	14473		25539	
Jul	11073	11073	40,608	36612	
Aug	10124	21197		46736	
Sep	10116	31313		56852	
Oct	10584	10584	40,608	67436	
Nov	7644	18228		75080	
Dec	11755	29983		86835	

**Volatile Organic Compounds (VOC) pounds**

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit (tons)
Jan	0	0	14,807	0	30.0
Feb	68	68		68	
Mar	3894	3962		3962	
Apr	857	857	14,958	4819	
May	1992	2849		6811	
Jun	2264	5113		9075	
Jul	3968	3968	15,110	13043	
Aug	3621	7589		16664	
Sep	3632	11221		20296	
Oct	3802	3802	15,110	24098	
Nov	2746	6548		26844	
Dec	4235	10783		31079	

**Oxides of Sulfur (SO2) pounds**

Date	Monthly	Quarter to Date	Quarterly limit	Year to Date	Yearly Limit (tons)
Jan	0	0	8,252	0	16.7
Feb	27	27		27	
Mar	1558	1585		1585	
Apr	343	343	8,342	1928	
May	797	1140		2725	
Jun	905	2045		3630	
Jul	1587	1587	8,434	5217	
Aug	1448	3035		6665	
Sep	1453	4488		8118	
Oct	1521	1521	8,434	9639	
Nov	1099	2620		10738	
Dec	1694	4314		12432	

## **Attachment C**

### **Bio-19 Giant Garter Snake Habitat**

An agreement was executed by SMUD on June 4, 2003 for the purchase of 41.5 acres of GGS mitigation habitat from Wildlands, Inc. for \$1,245,000. The payment was made October 3, 2003. The USFWS had previously determined that GGS habitat only occurs west of the Folsom-South Canal and does not include the Cosumnes Power Plant. Gas pipeline construction was complete in fall 2004, and successful revegetation of the pipeline corridor was documented in the pipeline final biological report previously submitted to the CEC. The first annual compliance report contains this summary for completeness.

## **Attachment D**

### **Bio – 2: Biological Activities Summary**

In 2023 the Workers Environmental Awareness Program (WEAP) continued to be implemented.

There was no California tiger salamander (CTS) occurrence at the Cosumnes Power Plant (CPP) between January 1, 2023 and December 31, 2023.

From 2015 to 2023 the Workers Environmental Awareness Program (WEAP) continued to be implemented.

In 2015 the Workers Environmental Awareness Program (WEAP) was updated.

From 2010 to 2014 the Workers Environmental Awareness Program (WEAP) continued to be implemented.

In 2009 the Workers Environmental Awareness Program (WEAP) was updated.

The following was reported in the 2008 CEC Annual Compliance Report for CPP with regard to the Cosumnes Power Plant Revegetation Monitoring Report of 2007-2008:

“The second year of a two-year vegetation survey of the batch plant lay down area, and water line was performed in spring 2008. The percentage of ground cover and overall species diversity has significantly increased in all three areas since 2004. Following the initial revegetation efforts in 2004, percent cover at the batch plant site was between 20 percent (on the eastern portion), and 70 percent (in the northern area). In 2008, vegetative cover across the entire site was over 90 percent with species composition similar to that observed in adjacent grassland habitats. Likewise, vegetation within the water line area has increased from an estimated 5 to 20 percent total cover in 2004 to over 90-95 percent cover and a diverse range of plant species. The lay down area was not surveyed in 2004 but currently has vegetation ground cover greater than 95 percent.

The CPP Biological Resources Post-construction Compliance Monitoring Report (December 2006) summarized 9 California Tiger Salamander (CTS) sightings from June 2005 to February 2007. A single sighting of a CTS occurred on January 10, 2008. This individual required relocation and the U.S. Fish and Wildlife Service (USFWS) were notified for approval to relocate this individual. Relocation was successful and post-relocation information was provided to the USFWS.

Four California tiger salamander (CTS) occurrences were documented at the Cosumnes Power Plant (CPP) between January 22, 2009 and February 17, 2009. Two individual CTS required relocation and the U.S. Fish and Wildlife Service (USFWS) was notified for approval to relocate this individual. Relocation was successful and post-relocation information was provided to the USFWS. Two individual CTS were found dead on the site and the USFWS was notified of the mortalities. No modifications to mitigation measures were required for post-construction activities of CPP.

## **Attachment E**

### **Bio – 5: Report of Mitigation implementation**

- There was no update made to the revegetation plan for CPP.

## Attachment F

### Haz – 1 Cosumnes Power Plant Chemical Inventory – 2023

Chemical	CAS #	Quantity on site	Location
Aqueous Ammonia	1336-21-6	18,000 gallons	North side of facility
Hydrogen	1333-74-0	40,000 cubic feet	CT #2,3 and trailer
Oxygen	7782-44-7	2,000 cubic feet	Maintenance Bldg/Laydown Yd
Acetylene	74-86-2	2,000 cubic feet	Maintenance Bldg/Laydown Yd
Argon	7440-37-1	2,000 cubic feet	Maintenance Bldg/Laydown Yd
Nitrogen	7727-37-9	20,000 cubic feet	CEMS Shelters/HRSGs
Carbon Dioxide	124-38-9	15.75 tons	CT #2,3 and West side
Sulfuric Acid	7664-93-9	8,800 gallons	Cooling tower / ZLD / Batteries
CEMS Calibration Gas	7727-37-9	2,000 cubic feet	CEMS Shelters
Sodium Hypochlorite	7681-52-9	8,650 gallons	Cooling Tower, Water Treatment/Candle Filter
FloGard MS6222	7320-34-5	1000 gallons	Cooling Tower
Spectrus NX 1102	Various	800 gallons	Cooling Tower
Gengard GN 8020	125438-5052	1000 gallons	Cooling Tower
Corrshield NT 4200	Various	110 gallons	Closed Cooling Water Loop
Sodium Sulfate	7757-82-6	6,600 gallons	ZLD
Calcium Chloride	10043-52-4	6,600 gallons	ZLD
Sodium Hydroxide	001310-73-2	800 gallons	ZLD
Hypersperse MDC700	None	110 gallons	Water Treatment Building
Foamtrol AF1740	64741-44-2	300 gallons	ZLD
Optisperse HP 3100	1310-73-2	550 gallons	Water Treatment Building
Steamate NA1324	1336-21-6	600 gallons	Water Treatment Bldg. / Storage
Lubricating Oil	64742-65-0	25,000 gallons	Throughout site equipment
Mineral Insulating Oil	64742-46-7	60,000 gallons	Contained in transformers
Conntect 6000	Various	400 gallons	Water Wash Skid / Storage
Gasoline	8006-61-9	250 gallons	Fuel Storage Area
Diesel	68476-34-6	350 gallons	Fuel Storage Area
DEF	78-48-8	55 gallons	Fuel Storage Area
Propane	74-98-6	200 gallons	Haz Material Storage Building
Paint	Various	80 gallons	Maintenance Building
Solisep MPT134	12042-91-0	110 gallons	Water Treatment Building
Calcium Sulfate Dihydrate	13397-24-5	8,500 pounds	ZLD
Sodium Bisulfite		110 gallons	Water Treatment Building
Perlite	93763-70-3	7.1 tons	Candle Filter System

## Attachment G

### Water Quality – 7 ZLD Status Report

The Zero Liquid Discharge (ZLD) system was operated continuously throughout 2023 while the plant was on line. For operating year 2023, availability of the ZLD system was 92% and was operating for 65% of the year. Routine maintenance and cleaning were performed throughout the year.

- Blow down waste water from the cooling tower is stored in two 850,000-gallon tanks located on the site property as part of the ZLD continuous waste water process. No other interim wastewater stream is stored on site.
- Throughout the year the ZLD is actively monitored and maintained. A proactive approach to ZLD maintenance is used and that allows CPP to have high ZLD performance and availability. Below is a list of maintenance completed throughout 2023.
  - Performed monthly- filter press inspection and repaired
  - Performed monthly-
  - BC-Feed Tank PH calibration
  - Performed monthly -vibration analyses for all rotating equipment
  - Performed monthly-spin down impeller washes
  - Performed once per shift- on-line impeller washes
  - Performed Semi Annually- Replace all camlock gasket connections
  - Performed Semi Annually- Cleaned DA saddles
  - Performed Daily-chemistry/rounds are collected
  - Semi-Annual change oil for all chemical injection pumps
  - Annually - Replaced Demister Pads, Replaced DA saddles
  - Periodic –Replaced filter press belts
  - Replaced filtrate pump mechanical seal
  - Replaced BC Feed Tank Mixer Assembly.
  - Repaired steam leak on the equalization line

Disposal:

352 tons of ZLD salt cake was land-filled during 2023 under EPA Waste Generator ID# CAR000344259.

Non-hazardous ZLD cake was land-filled during 2023 to Potrero Hills

UNIVAR USA Inc. provides waste disposal services for Cosumnes Power Plant.

See Appendix B for list of Vacuum Truck loads for 2023 of water and sludge disposal.

Landfills utilized for ZLD cake disposal and sludge disposal:

- Potrero Hills Landfill  
3675 Potrero Hills Lane  
Suisan City, CA 94585

- See Appendix A for the 2022-2023 Annual Report for Discharges of Storm Water Associated with Industrial Activity.

## Attachment H

### Water Res – 1 Water use Summary

Cosumnes Power Plant 2023 total water usage was 1,817.8 acre-feet and a three-year average of 1,670.3 acre-feet. Water usage for the 2023 year is lower than previous years due to the two Cold Iron maintenance outages held in January and April. This is less than the 3-year average maximum allowable usage of 2,663 acre-feet.

2006 to 2023 Monthly Water Usage for Cosumnes Power Plant in Acre Feet.

CPP Water Use																		
Acre Feet	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
January	72.2	181.1	163.1	176.3	179.2	161.2	191.6	185.2	195.9	187.33	195.1	174.1	191.7	20.1	203.1	191.9	186.5	14.3
February	94.7	156.0	174.1	172.2	177.9	157.2	178.7	166.6	166.9	172.97	191.1	141.1	174.9	13.1	221.8	181.6	176.5	17.9
March	145.1	181.4	183.5	126.0	198.6	173.1	154.7	188.0	202.6	175.27	176.8	167.6	171.3	110.9	231.8	161.0	71.3	189.9
April	90.7	171.2	170.0	145.7	190.0	109.0	116.9	55.8	202.6	124.52	84.2	60.2	14.0	68.5	165.4	119.1	15.5	56.0
May	109.7	189.5	202.9	171.2	106.2	96.3	193.7	200.4	196.0	218.2	170.1	148.7	50.6	104.7	192.8	225.8	14.3	128.7
June	124.7	227.0	222.1	145.0	125.8	143.0	213.4	222.3	227.9	236.15	214.4	151.4	213.3	188.9	221.7	234.1	23.3	137.7
July	220.8	214.2	226.6	237.3	226.4	199.3	218.1	225.8	242.3	225.87	229.7	220.8	233.2	233.2	233.1	259.9	40.8	256.6
August	219.4	242.4	245.3	236.2	220.6	228.2	233.7	225.8	231.8	240.36	235.3	229.1	220.0	251.2	243.3	251.5	37.4	236.3
September	208.5	197.6	218.2	231.2	234.0	224.8	223.7	218.9	224.8	235.9	226.7	201.4	222.1	228.1	223.1	236.5	106.6	208.7
October	186.3	145.0	223.3	119.7	221.7	206.4	206.4	206.5	221.1	226.36	196	207.3	206.2	275.2	208.2	200.1	13.8	221.2
November	118.1	166.4	101.6	192.8	180.7	173.6	104.2	156.3	84.2	139.7	192.8	138.3	195.8	257.5	183.7	184.7	25.7	148.4
December	174.4	180.5	182.1	175.3	174.0	183.9	144.8	187.8	190.2	191.59	187.3	186.6	176.0	231.7	197.9	184.5	50.8	202.1
Yearly Total	1,764.5	2,252.2	2,312.7	2,128.9	2,235.1	2,056.0	2,179.9	2,239.4	2,386.4	2,374.2	2,299.5	2,026.6	2,069.1	1,983.1	2,525.8	2,430.7	762.3	1,817.8
Last Three Years' Average			1,670.3	Acre Feet Per Year.														

## **Attachment I**

### **COM -7 Conditions**

**7.1 – Compliance Matrix provided in Attachment J of this report.**

**7.2 – Summary of the current project operating status and an explanation of any significant changes to facility operations during the year.**

- CPP is currently operational. During 2023 there was a cold iron, i.e., a plant wide, outage to repair a Steam Turbine Generator (STG) fault to include a generator rewind and restack. In 2022 the Facility received variances (interim and regular) to operate in Simple Cycle Operation – either in a 1x0 or 2x0 configuration. On February 23, 2023 the variance ended as the Combined Cycle Operation recommenced since the STG returned to operation. There was no simple-cycle operation in 1Q 2023.

**7.3 – Documents required by specific conditions to be submitted along with the Annual Compliance Report.**

- Required documents contained in this 2023 Annual Compliance Report.

**7.4 – Cumulative listing of all post-certification changes approved by the Energy Commissions or cleared by the CPM.**

- 2007, Cooling Tower TDS Limit Change Approval.
- On April 16 2009, CPM Approval of Modification to Upgrade the ZLD System and, Approval for Installation of a One Pass Filtration System.
- On June 20, 2011 CPM issued Staff Analysis of Proposed Modifications for Fuel Supply Modification.
- On August 8, 2011 CPM issued Revised Staff Analysis of Proposed Modifications for Fuel Supply Modification.
- On October 17, 2011, CPM approved (via email) new chemicals for HAZ1 submitted on 9-9-2011.
- On November 2, 2011 CEC approved Order No. 11-1102-5: a petition to modify the fuel supply and other modifications to the SMUD Cosumnes Power Project, in the matter of docket no. 01-AFC-19C.
- On November 17, 2011 CPM issued Notice of Decision by the CEC regarding Docket 01-AFC-19C.
- On January 8, 2018 Compliance Office Manager approved the upgraded turbine and emission control system components as part of a scheduled maintenance event indicating the activities do not require filing of a post-certification amendment.
- On August 29, 2018 CEC accepted and posted Cosumnes Power Plant's Petition to Amend to increase Electrical Production in the matter of docket no. 01-AFC-19C.
- On November 8, 2018 CEC prepared the staff analysis (COC) regarding CPP's petition to amend (TN #225863).
- On December 6, 2018 CEC staff responses (TN # 22603) indicated that COC AQ-15 A i was modified (see compliance matrix in section J).
- On December 10, 2018 CEC filed order 18-1210-4: a petition to amend the facility license in the matter of docket no. 01-AFC-19C.

- On January 7, 2019 CEC issued notice of approval of SFA's license amendment for the electrical generation increase from the AGP/DLN 2.6+ and installation of the Oxidation Catalyst (order 18-1210-4) docket no. 01-AFC-19C. [New COC's became effective after the 1/9/19 CEC business meeting and upon implementation of the CPP turbine upgrades.]
- In February 2020 CPM indicated that the first "Condition AQ-28" was intended to be a description of Condition of Certification 28 and that AQ-30 is duplicative to AQ-29.
- In May 2020 CPM issued a Memorandum informing the Commission of an error in AQ-10 and to update to the SOx values in AQ-10; this was placed in the June 10 business meeting consent calendar and approved without discussion.
- In May 2020 CPM informed CPP that staff "copied the original conditions (AQ-48 and AQ-49) for the perlite storage from the 2011 amendment incorrectly, which resulted in two identical conditions (AQ-29 and AQ-30)".
- In June 2020 CPM sent an email indicating the language in AQ-15 is as stated in staff's response to comments filed on December 6, 2018.
- In July 2020 the CEC issued a Statement of Staff Approval of Proposed Change to eliminate the duplication of conditions AQ-29 and AQ-30.
- On April 19, 2022, CPM approved (via email) new chemicals for HAZ1 submitted on 4-19-2022.
- On July 6, 2022 CPP sent the CEC a Petition for Post-Certification License Amendment for Temporary Simple Cycle Operation. (TN Number: 243844) Staff Approved on 7/20/22 (TN244135).
- On July 7, 2022 CPM approved 1x0 and 2x0 testing prior to approval of the simple cycle PTA.

**7.5 – Explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided.**

- No submittal deadlines were missed for 2023.

**7.6 – Listing of filings made to, or permits issued by, other governmental agencies during the year.**

- On January 23, 2023 CPP submitted specifications for new CEMS analyzers and an (Unit 3) Umbilical to SMAQMD which were subsequently installed during the plant-wide outage.
- On January 30 and April 18, 2023 CPP Submitted Hearing Board Findings and Orders; Simple-Cycle Quarterly Records for the facility Petition No. 2022-002 to SMAQMD.
- On February 24, 2023, SMAQMD Regular Variance (Petition No.2022-002) allowing simple cycle operation through August 14, 2023, ended as the plant returned to Combined Cycle operation the day prior. SMAQMD was subsequently notified.
- On March 10, 2023 CPP submitted the annual VPP STAR renewal report to CalOSHA consultation.
- On March 27, 2023 SMUD deducts 2 tons of SO2 allocations in US EPA's CAMD.
- On March 24, 2023 CPP submitted annual GHG emissions data to the US EPA through e-GGRT.
- On April 6, 2023 CPP submitted HMP annual renewal to Sac EMD.
- On July 28, 2023 SMUD received notification that CPP's 2022 GHG emissions data, submitted to California ARB, received a "findings are true, accurate and complete" review of an independent verifier's verification of Greenhouse Gas Emissions.
- On June 5, 2023 the 2022 to 2023 annual storm water report was submitted to the California State Water Control Board.
- On February 12, 2024 CPP submitted the 2022 Emissions Statement Certification to SMAQMD.

### **7.7 – Projection of project compliance activities scheduled during the next year.**

- The 2023 Title V Certification Report in January 2024.
- Title V Semi-Annual Monitoring Report in January 2024 for July to December 2023.
- Third VPP Star renewal recertification review with CalOSHA February 26 to 29, 2024.
- Annual RATA and Compliance Source Tests for testing March 19 to 22, 2024.
- Quarterly Calibration Gas Audits (CGAs) of the CO analyzers.
- Quarterly linearity's of the NOx and O2 analyzers.
- Quarterly electronic data reports (EDR) to the EPA.
- Annual GHG Reporting – March 2024.
- SMAQMD Emissions Inventory report in March 2024.
- Fuel Flow Meter Transmitter Calibrations – 1st Quarter 2024.
- Hazardous Material Plan annual review in April 2024.
- 2023-2024 Annual Report for Storm Water Discharges Associated with Industrial Activities to be submitted by July 15th, 2024.
- Title V Semi-Annual Monitoring Report in July 2024 for January to June 2024.
- TBD: Renewal of Title V NO TV2012-19-01 and PTO's 25800/01, 25634/35,16012/13.
- Title V Semi-Annual Monitoring Report in January 2025 for July to December 2024.
- The 2024 Title V Certification Report in January 2025.

### **7.8 – Listing of the year's additions to the on-site compliance file.**

- On June 6, 2023, CEC's CPM issued (via email) immediate notification Communications Protocol (applicable during the summer months) for unplanned incidents that limit generating capacity or impaired operations.

### **7.9 – Evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date.**

- The plan is up to date and there are no new recommendations.

### **7.10 – Listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved complaints, and the status of any unresolved complaints.**

- There are no known complaints or NOVs.

# **Attachment J**

## **2023 Cosumnes Power Plant CEC Compliance Matrix**

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
		License obtained				09/17/03								
		Mobilization				09/17/03								
		Start of construction (rough grading & pipeline)				10/09/03								
		Start of construction (foundations)				11/01/03								
		Start of construction (balance of plant)				12/01/03								
		Start of construction (pipeline)				05/03/04								
		Gas pipeline commissioning (purge and fill)				10/12/04								
		Energize transmission lines (backfeed)				05/09/05								
		First CTG firing				10/22/05								
		First steam blow				11/14/05								
		Commercial operation (power to grid; 80%)				03/08/06								
		Project completion				03/08/06								
Air Quality	AQ-SC6	Submit any proposed air permit modification to the CPM	CEC - CPM	5 (as needed)	Within 5 working days of proposed modification	as needed	as needed		SMUD Financing Authority submitted an Adm. Amendment application to SMAQMD to PTOs 25800 & 25801	Regular Variance approved on 8/16/2022	Completed February 23, 2023		SMUD and EE PPS	as needed
Air Quality	AQ-SC6	The project owner shall submit all modified air permits to the CPM within 15 days of receipt	CEC-CPM	15	15 Days after receipt	as needed	as needed		SMUD Financing Authority submitted the SMAQMD Variance to PTOs 25800 & 25801	Regular Variance emailed to CPM on 9/15/22	as needed		SMUD and EE PPS	as needed
Air Quality	AQ-1	The equipment shall be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendation at all times.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report		Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised	IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-3	This license does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the California Health and Safety Code or the rules and regulations of the Air Quality Management District.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report		Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised	IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-4	A legible copy of the permit(s) shall be maintained on the premises with the equipment.	SMAQMD and CEC - CPM		All times			Complete			IP	Copy of permit at CPP	EE PPS	
Air Quality	AQ-5	The facility may not discharge air contaminants or other materials that cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.	SMAQMD and CEC - CPM		All times			Complete	1-7-2019 revised		IP		EE PPS	
Air Quality	AQ-6	The equipment shall not discharge into the atmosphere any visible air contaminant other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour, if the discharge is as dark or darker than Ringelmann No. 1 or is equal to or greater than 20% opacity. Include date, time, and duration of any violation of this condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised	No Visual Emissions Observed	IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-7	Emissions of VOC, Nox, CO and NH3 from the following equipment (CT2.3) must not exceed the following emission limits. Include date, time, and duration of any violation of this condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-8	Emissions of VOC, Nox, CO, PM10/2.5 and SOx from the following equipment (CT2.3) shall not exceed the following emission limits excluding periods containing start-ups, shutdowns and short-term excursions as defined in condition AQ-14. Include date, time, and duration of any violation of this condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-9	Emissions of Nox, CO, VOC, Sox, and PM-10/2.5 from the following equipment (CT2.3, Cooling Tower, Perlite Storage Silo) must not exceed the following emission limits including periods containing start-ups, shutdowns or short term excursions as defined in AQ-14. Include date, time, and duration of any violation of this condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-10	Emissions of Nox, CO, VOC, Sox, and PM-10/2.5 from the following equipment (CT2.3, Cooling Tower, Perlite Storage Silo) must not exceed the following emission limits including periods containing start-ups, shutdowns or short term excursions as defined in AQ-14. Include date, time, and duration of any violation of this condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	5-22-2020 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-11	The total consumption rate of digester gas by the Cosumnes Power Plant is restricted to 2,500 scfm. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-12	The digester gas used at this facility shall not exceed 50 ppm of H2S, measured prior to the commingling with the natural gas. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-13	Each combined cycle turbine shall not be operated without a functioning selective catalytic reduction and oxidation catalyst air pollution control systems, excluding periods of start-ups and shut-downs as defined in AQ-14. Include information on the date, time, and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-14	Startup, shutdown and short term excursions are defined as follows: A. Startup is defined as the time period commencing with the introduction of fuel to the gas turbine and ending at the time that the 15 minute average NOx and CO concentrations do not exceed 2.0 ppmvd at 15% O2 and 4.0 ppmvd at 15% O2 respectively. i. In no case may the startup time period exceed 180 consecutive minutes. B. Shutdown is defined as the 30 minute time period immediately prior to the termination of fuel flow to the gas turbine. C. Short term excursion is defined as a 15-minute period designated by the owner/operator, that is the direct result of transient load conditions, when the 15 minute average NOx concentration exceeds 2.0 ppmvd at 15% O2. i. No more than four consecutive 15-minute periods may be designated as short term excursions. ii. For each gas turbine, no more than 40 15-minute periods/calendar year (10 hours/calendar year) may be designated as short term excursions. iii. Examples of transient load conditions include, but are not limited to the following: (a) initiation/shutdown of combustion turbine inlet air cooling. (b) rapid combustion turbine load changes. Include information on the date, time, and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-15	For purposes of determining compliance with SMAQMD Rule 413: A. Startup is defined as the time period commencing with the introduction of fuel to the gas turbine and ending at the time that the 15 minute average NOx concentrations do not exceed 9.0 ppmvd at 15% O2. i. The startup period must not exceed 1-hour following a shutdown of the associated steam turbine or associated HRSG and steam piping of less than or equal to 8-hours. ii. The startup period must not exceed 3 hours following a shutdown of the associated steam turbine or associated HRSG and steam piping between 8 hours and 72 hours. iii. The startup period must not exceed 1 hour following a shutdown of the associated steam turbine or associated HRSG and steam piping of less than 8 hours. B. The shutdown period of a gas turbine must not exceed 1 hour. C. Short term excursion is defined as a period of time not exceeding 6 hours and not more than four consecutive 15 minute blocks. The total of all 15 minute blocks must not exceed 10 hours per calendar year per gas turbine. Include information on the date, time, and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	6-2020 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-18	The following records shall be continuously maintained on site for the most recent five-year period and shall be made available to the APCO upon request.	maintained on site	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-19	Submit to SMAQMD and CPM, quarterly reports based upon table in the condition. The report for the fourth quarter can be an annual compliance summary for the preceding year.	SMAQMD - APCO CEC - CPM	A. quarterly B. annually	Provide emissions data to APCO and CPM on quarterly basis due by 30th day following the end of the calendar quarter	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual reports. In addition, this information shall be maintained on site for a minimum of five (5) years.	EE PPS	quarterly and annually
Air Quality	AQ-22	The project owner shall ensure that the paved roads described in SMAQMD ERC applications 00767- 00769, 00772-0075 are properly maintained and repaired for the life of the CPP to confirm PM10 emission reductions. Provide pictures in the ACR.	SMAQMD - APCO CEC - CPM	annually	Annually	annual operating compliance report	annual operating compliance report	02/28/24 Annual Compliance Report Submittal deadline	1-7-2019 revised		IP	Take pictures for annual report	SMUD and EE PPS	annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-23	The project owner must perform a VOC, NOx, SO2, PM10, CO and Ammonia source test and CEM accuracy (RATA) test of each gas turbine once each calendar year (no more than 14 calendar months following the previous performance test). The SMAQMD Air Pollution Control Officer may waive the annual PM10 and/or VOC source test requirement if, in the SMAQMD Air Pollution Control Officer's sole judgment, prior source test results indicate an adequate compliance margin has been maintained A. The project owner shall submit a test plan to the SMAQMD Air Pollution Control Officer for approval at least 30 days before the source test is to be performed. B. The SMAQMD Air Pollution Control Officer shall be notified at least 7 days prior to the emission testing date. C. During the test(s), each turbine is to be operated at its maximum firing capacity defined as □ 90% of rated heat input capacity and taking into account ambient conditions. D. The source test results shall be submitted to the SMAQMD Air Pollution Control Officer within 60 days from the completion of the source test(s). E. Source testing shall occur with a representative flow of digester gas into the pipeline feeding the fuel supply to the turbine being tested so that the turbine being tested is using the digester gas.	SMAQMD - APCO CEC - CPM	30 days before; 7 days before; 60 after		annual operating compliance report	annual operating compliance report	2/1/23; 2/21/23; 4/25/23	1-7-2019 revised		IP	Submit annual source test	SMUD and EE PPS	annually
Air Quality	AQ-25	The total dissolved solids content of the circulating cooling water shall not exceed 1,500 ppmw, averaged over any consecutive three-hour period. Include information on the date, time, and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-26	The cooling towers shall not use any chromium-containing water treatment chemicals. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-27	Emissions (PM10/2.5) from the cooling tower shall not exceed the following limits averaged over a three-hour period. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Air Quality	AQ-28	Pertains to the installation of the perlite Storage Silo and attached APC Dust Collector Cyclonaire. The emissions from the Dust Collector shall not exceed 2.6 lb/quarter of PM10 based on maximum capacity 26 hour/qtr, and particulate emissions of 0.02gr/dscf at 585 cfm. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised	CPM indicated in 2/19/20 email the first AQ-28 is a description and the hyphen "-" should be removed.	IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-29	The Dust Collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The average pressure drop shall not exceed the manufacturer's recommendation. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised	CPM indicated in July 2020 that the CEC issued a Statement of Staff Approval of Proposed Change to eliminate duplication of AQ-29 & AQ-30	IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-30	The Dust Collector cleaning frequency and duration shall follow the manufacturer's recommendations.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised	CPM indicated in 2/20/20 email that this is a duplicative condition and to report in the same as AQ-29	IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-31	Total perlite delivered to the silo per quarter cannot exceed 101.4 tons. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-32	The following record (total perlite delivered to the site – tons/qtr) shall be continuously maintained on site for the most recent five-year period and shall be made available to the air pollution control officer upon request. Quarterly and yearly records shall be made available for inspection within 30 days of the end of the previous quarter or year respectively. Include information on the date, time and duration of any violation of this permit condition.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually
Air Quality	AQ-33	Malfunction - the Air Pollution Control Officer shall be notified of any breakdown of the emissions monitoring equipment, any equipment, or any process which results in an increase in emissions above the allowable emissions limits stated as a condition of this permit or any applicable state or federal regulation or which affects the ability for the emissions to be accurately determined.	SMAQMD and CEC - CPM	A. quarterly B. annually	quarterly and annually	quarterly operating compliance report	quarterly operating compliance report	Q1 2023 Report 4/25/23 Q2 2023 Report 7/18/23 Q3 2023 Report 10/9/23 Q4 2023 Report 1/12/24	1-7-2019 revised		IP	Develop quarterly and annual operating compliance reports	EE PPS	quarterly and annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Biology	BIO-2	Submit biology record summaries in Annual Compliance Report.	CEC - CPM	annually	Submit annually during operation	annual operating compliance report	annual operating compliance report	02/28/24 Annual Compliance Report Submittal deadline			IP	Develop biologist annual reporting format	SMUD	annually
Biology	BIO-4	Signed Statements for active personnel shall be kept on file for six months, following the termination of the individual's employment.	CEC - CPM	annually	Submit annually during operation	annual operating compliance report	annual operating compliance report	02/28/24 Annual Compliance Report Submittal deadline			IP	Administered by a competent individual(s) acceptable to the designated biologist.	EE PPS	as needed
Cultural	CUL-5	Worker Environmental Awareness Program (WEAP) training shall be provided.	CEC - CPM	on going	as needed			on going			IP		EE PPS	as needed
Hazardous Materials Mngmt	HAZ-1	Provide a list of hazardous materials contained at the facility in reportable quantities.	CEC - CPM	annually	Provide in annual compliance report	annual operating compliance report	annual operating compliance report	02/28/24 Annual Compliance Report Submittal deadline	6-22-2016		IP	Develop a list of hazardous materials (see Appendix B)	EE PPS	annually
Noise	NOISE-2	File a copy of the noise complaint resolution form with the local jurisdiction (Sacramento County) and the CPM.	CEC - CPM Sacramento County City of Elk Grove	5 (after, as needed)	Within 5 days of receiving noise complaint	as needed	as needed	2006 Annual Report			as needed	Prepare form as needed	SMUD and EE PPS	as needed
Visual Resources	VIS-2	Status Report regarding treatment maintenance.	CEC - CPM	30	Provide in annual compliance report	03/08/06	02/06/06	1/12/06 (CPP06-010) to J. Scott		inspection took place on 2/24/06	C-but report	Verify plant is ready for inspection per color plan	SMUD and EE PPS	annually
Visual Resources	VIS-5	Submit for CPM review and comment, written documentation describing the lighting control measures and fixtures, hoods, shields proposed for use.	CEC - CPM	A. 60 B. 30 C. annually	Report lighting complaints and resolution annually during operation	12/01/03	10/02/03	Change to LED request: 2/22/16 to M. Dyas	2/22/16 by e-mail from M Dyas and D. Flores staff.	No lighting complaints in 2023	C- but report	Develop exterior operational lighting treatment plan	SMUD	Annual report of complaints
Waste Mngmt.	WASTE-1	Project owner to obtain from the Department of Toxic Substances Control a hazardous waste generator identification number.	Sacramento County EMD; EPA RCRA	as needed	as generated			annual		CAL00031 2069 replaced with CAR00034 4259 (effective Oct. 2022)			EE PPS	as needed
Waste Mngmt.	WASTE-2	Notify upon becoming aware of impending enforcement action related to hazardous waste.	CEC - CPM Jurisdiction	10 (after)	Notify within 10 days of impending enforcement action	as needed	as needed				as needed	Notify as needed	SMUD and EE PPS	as needed
Waste Mngmt.	WASTE-3	Document the actual waste management methods used during the year compared to planned management methods.	CEC - CPM Sacramento County	30	Provide in annual compliance report	03/08/06	02/06/06	1/5/06 (CPP06-1350) to J. Scott & E. Rothschild	1/17/06 "no comments" Ryan at Sac County EMD		C- but report	Develop operation waste stream plan	EE PPS	annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Waste Mngmt.	WASTE-5	Submit reports filed by registered professional engineer or geologist if contaminated soil is unearthed.	CEC - CPM	5 (after, as needed) within 24 hrs (as needed)	Submit 5 days after report is received for remediation of contaminated soils. Notify CPM within 24 hours of orders to halt construction	as needed	as needed	As Required			as needed	Develop reports as needed	SMUD	as needed
Waste Mngmt.	WASTE-6	Notify of ZLD salt cake test results and planned disposal method, or any substantive change in the treatment process.	CEC - CPM	30 days if change	After initial generation of salt cake	03/08/06	04/07/06	4/26/06 e-mail to J. Scott			IP	Test salt cake and determine disposal	EE PPS	as needed
Water & Soil Resources	WATER QUALITY-7	Submit results of the Waste Extraction Test of the residual cake solid waste from the ZLD. Submit status report in annual compliance report. Submit annual monitoring report for stormwater as normally submitted to the CVRWQCB under NPDES Permit for Discharges of Storm water.	CEC - CPM	annually	Annually	04/07/06	03/31/06	3/1/07 First annual Compliance Report		See Attachment G, Appendix, A and Appendix B	IP	Report in annual compliance report	SMUD and EE PPS	Annually
Water & Soil Resources	WATER RES.-1	Total water use for CPP and landscape irrigation shall not exceed annual average of 2,663 AFY over any three successive calendar years. Maintain daily records and notify CPM immediately if peak flow is exceeded.	CEC - CPM	annually	Notify CPM if peak flow is exceeded.	annual operating compliance report	annual operating compliance report	02/28/24 Annual Compliance Report Submittal deadline	11-2-2011 revised	See Attachment H	IP	Report as needed	EE PPS	annually
General Conditions	COM-7	Prepare and submit an annual operating compliance report containing all 10 referenced elements.	CEC - CPM	annually	Submit annually during operation	annual operating compliance report	annual operating compliance report	02/28/24 Annual Compliance Report Submittal deadline		See Attachment I and J	IP	Prepare annual operating compliance report	SMUD and EE PPS	Annually
<b>Closed or completed conditions</b>														
General Conditions	COM-2	Project owner shall maintain project files on-site or at an alternative site approved by the CPM, for the life of the project	CEC - CPM	Not specified	None - for information only	03/08/06	03/08/06	3/1/07 First annual Compliance Report			C	Designate filing area and maintain files	SMUD and WGPO	03/01/06

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Noise	NOISE-5	Submit a summary report of noise survey to jurisdictions, to include any remedial actions necessary to achieve compliance	CEC - CPM Sacramento County City of Elk Grove	45 (after)	After post-construction noise survey, but within 30 days of 80 percent sustained output	03/08/06	04/22/06	(CPP06-102) May 2, 2006 hand delivered to J. Scott			C	Perform area noise surveys	SMUD and WGPO	04/15/06
Noise	NOISE-7	Notify CPM within one week of any noise survey requests received	CEC - CPM	7	Prior to commercial operation	03/08/06	03/08/06				C	Develop sound attenuation report	SMUD and WGPO	03/01/06
T-Line Safety & Nuisance	TLSN-3	Resolve complaints of radio or television signal interference	CEC - CPM	1 year (after)	Within 1 year, summarize complaints of interference	03/08/06	03/08/07	None in 2006			C	Resolve as-needed	SMUD and WGPO	annually
Water & Soil Resources	WATER QUALITY-9	Develop detention basin operations and maintenance plan	CEC - CPM	60	Prior to operation	03/08/06	01/07/06	02/08/06 WGPO hand delivered to J. Scott			C	Prepare basin operations and maintenance plan prior to operation	WGPO	12/08/05
Visual Resources	VIS-2	Submit simulations, maintenance plan, and a proposed treatment plan for all project structures and buildings visible to the public at least 45 days prior to ordering the first structures that are color treated during manufacture.	CEC - CPM Sacramento County	45	Prior to ordering the first structures that are color treated during manufacture	09/17/03	08/03/03	1/29/03 4/10/03 (CPP03-157)	Verbal approval from G. Walker		C	Prepare plant visual simulations with various color choices and visual maintenance plan	SMUD and WGPO	07/27/03
Biology	BIO-19	Include status of mitigation measures in annual compliance reports	CEC - CPM	annually	Submit annually during operation	10/09/03	annual operating compliance report	3/1/09 Annual Compliance Report			C	prepare monthly compliance report	SMUD	annually
General Conditions	COM-11	Project owner must send a letter to property owners living within one mile of the project notifying them of a telephone number to contact project representatives with questions, complaints or concerns. Notify CPM and provide documentation of complaints, warnings, fines, etc.	CEC - CPM	A. 0 B. 10 (after)	A. Notification of neighbors prior to start of construction B. Notify CPM within 10 days of complaints	10/09/03	10/09/03	9/2/03 (CPP03-532) to J. Scott 1/21/04 (CPP04-042) Request for modification of Condition	09/08/03	Similar to Noise-1; issue one letter Approved	C	Prepare information to notify area residents prior to construction	SMUD and WGPO	Annually

**2024 CEC Compliance Matrix – Cosumnes Power Plant**

Technical Area	Condition Number	Description of Action/Submittal	Agency Submittal or Approval	Days Submitted or Notified Prior	Time Condition	Date of Time Condition	Expected Submittal Date	Date of Submittal or Last Revision	Date Approved by Agency	Notes	Status [not started/ in progress/ completed]	SMUD Prerequisite Tasks	Assigned To	Date Due
Visible Plumes	PLUME-1	Submit to the CPM for review the final design specifications of the cooling tower related to plume formation. The project owner shall not order the cooling tower until notified by the CPM that the two design requirements have been satisfied.	CEC - CPM	30	Prior to ordering the cooling tower	09/17/03	03/21/03	12/26/02 6/30/03 (CPP03-328) to J. Scott	1/9/03 conditional 12/26/2003	Approved	C	Provide cooling tower specifications and design data		
General Conditions	COM-5	Compliance matrix format for 8 minimum identifiers. Conditions do not need to be included after they have been identified in at least one monthly or annual compliance report.	CEC - CPM	0	Submit and obtain approval of all -pre-construction items	monthly construction compliance report	monthly construction compliance report	3/1/07 First annual Compliance Report			C	Monthly report	SMUD	annually

# **Attachment K**

## **2023 Cosumnes Power Plant Waste Management Methods**

**COSUMNES POWER PLANT**

**WASTE MANAGEMENT METHODS 2023**

<b>Stream #</b>	<b>Waste Streams</b>	<b>Actual (approx.)</b>	<b>Plan*</b>	<b>Comments</b>
1	Used Lubricating Oil	2.98 tons	See tables 8.13-2 & HM-180	Non-RCRA HW & Recycled
2	Used Oil Filters	1025 lbs.	1000 lb/yr	Non-RCRA HW
3	Laboratory Analysis Waste	240 gallons	Approx. 840 gal/yr	RCRA HW
4	Spent SCR Catalyst	0 lbs.	8000 lb/yr	Every 3-5 years
5	Oily Rags/Sorbents	1.125 tons	525 lb/yr	Includes oily debris (.0275 tons/55 gal)
6	Cooling Tower Sludge	0 lbs.	340 lb/yr	Non-haz, removed during periodic cleaning
7	Office Waste (trash)	6 cubic yds/week (trash) & 4 cubic yds/every other week (recyclable paper products)		Waste Management – General Trash & Recyclable
8	Other Non-Haz Waste  Bin pickup as needed.	46.5 tons Scrap Metal & 70.84 tons Wood/Misc/trash (mixed material)		Cal Waste and SMUD recyclable wastes: 30cu yd metal and 40cu yd wood (or misc. matl.) bins.
9	Universal Waste	18 shipments (bins, boxes, buckets, pallets)		Batteries, aerosol cans, bulbs, e-waste, ballasts
10	O&M Waste Liquid	36,500-gal Turbine Water Wash; 52,800 ZLD gal sump; 1025 gal misc. oily	See table HM-180	Non-RCRA HW
11	O&M Waste Solid	0.7225 tons	See table HM-180	RCRA & Non-RCRA HW
12	Chemical Feed areas	0 tons	See tables 8.13-2 & HM-180	Minimal
13	CO Catalyst (installed in 2018)	0 lbs	8000 lb/yr	Every 3-5 years

\*Tables referenced are from data requests/responses found at: CA.gov for docket 01-AFC-19

**Appendix A**  
**Annual Storm Water Discharge Report**



2022-2023  
**ANNUAL REPORT**  
FOR STORM WATER DISCHARGES  
ASSOCIATED WITH INDUSTRIAL ACTIVITIES

Reporting Period July 1, 2022 through June 30, 2023

**Retain a copy of the completed Annual Report for your records.**

Please remember that a Notice of Termination and new Notice of Intent are required whenever a facility operation is relocated or changes ownership.

If you have any questions, please contact your Regional Board Industrial Storm Water Permit Contact. The names, telephone numbers, and e-mail addresses of the Regional Board contacts, as well as the Regional Board office addresses, can be found at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/contacts.html](http://www.waterboards.ca.gov/water_issues/programs/stormwater/contacts.html)

**General Information**

**A. Facility Information**

WDID: 5S34I020075

Business Name: Cosumnes Power Plant

Physical Address: 14295 Clay East Rd

City: Herald

Contact Person: Eddie McCormick

State: CA

Phone: 209-748-5179

Zip: 95638

Email: [eddie.mccormick@smud.org](mailto:eddie.mccormick@smud.org)

Standard Industrial Classification (SIC) Codes: 4911-Electric Services

**B. Facility Owner Information**

Business Name: Sacramento Municipal Utility District Financing

Mailing Address: PO Box 15830

City: Sacramento

Contact Person: Pedro Juarez

State: CA

Phone: 916-732-5613

Zip: 95852

Email: [pedro.juarez@SMUD.org](mailto:pedro.juarez@SMUD.org)

**C. Facility Billing Information**

Business Name: Ethos Energy Power Plant Services

Mailing Address: 14295A Clay East Road

City: Herald

Contact Person: Eddie McCormick

State: CA

Phone: 209-748-5179

Zip: 95638

Email: [eddie.mccormick@ethosenergy.com](mailto:eddie.mccormick@ethosenergy.com)

## Question Information

1. Has the Discharger conducted monthly visual observations (including authorized and unauthorized Non-Storm Water Discharges and Best Management Practices) in accordance with Section XI.A.1?

Yes  No

If No, see Attachment 1, Summary of Explanation.

2. Has the Discharger conducted sampling event visual observations at each discharge location where a sample was obtained in accordance with Section XI.A.2?

Yes  No

If No, see Attachment 1, Summary of Explanation.

3. Did you sample the required number of Qualifying Storm Events during the reporting year for all discharge locations, in accordance with Section XI.B?

Yes  No

If No, see Attachment 1, Summary of Explanation.

4. How many storm water discharge locations are at your facility?

1

5. Has the Discharger chosen to select Alternative Discharge Locations in accordance with Section XI.C.3?

Yes  No

6. Has the Discharger reduced the number of sampling locations within a drainage area in accordance with the Representative Sampling Reduction in Section XI.C.4?

Yes  No

6.1. Has the Discharger reduced the frequency of sampling at the facility area in accordance with the Sample Frequency Reduction in Section XI.C.7?

Yes  No

7. Permitted facilities located within an impaired watershed must assess for potential pollutants that may be present in the facility's industrial storm water discharge. Using the table below, populated based on the facility's location, indicate the presence of the potential pollutant at the facility.

The facility is not located within an impaired HUC 10 watershed. You are not required to select any Industrial Pollutants. Skip Questions 8 and 9.

8. Has the Discharger included the above pollutants in the SWPPP pollutant source assessment and assessed the need for analytical monitoring for the pollutants?

Yes  No

If No, what date will the parameter(s) will be added to the SWPPP and Monitoring Implementation Plan?

9. Were all samples collected in accordance with Section XI.B.5?

Yes  No

If No, see Attachment 1, Summary of Explanation.

10. Has any contained storm water been discharged from the facility this reporting year?

Yes  No

If Yes, see Attachment 1, Summary of Explanation.

11. Has the Discharger conducted one (1) annual evaluation during the reporting year as required in Section XV?

Yes  No

If Yes, what date was the annual evaluation conducted? 05/03/2023

If No, see Attachment 1, Summary of Explanation.

12. Has the Discharger maintained records on-site for the reporting year in accordance with XXI.J.3?

Yes       No

If No, see Attachment 1, Summary of Explanation.

If your facility is subject to Effluent Limitation Guidelines in Attachment F of the Industrial General Permit, include your specific requirements as an attachment to the Annual Report (attach as file type: Supporting Documentation).

## ANNUAL REPORT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Eddie McCormick

Title: Facility Manager

Date: 06/05/2023

2022-2023

**Annual Report for WDID 5S34I020075**

**Summary of Explanations**

<a href="#">Explanation Question</a>	<a href="#">Explanation Text</a>
Question 3	The facility has a sample frequency reduction certification and is only required to collect two discharge samples per reporting year. Samples were collected in Dec. 2022 and January 2023.
Question 10	Storm water at the facility collects in an onsite retention pond. There were discharges from this pond on 12/14/22 and 1/9/2023 and samples were collected.

**Summary of Attachments**

<a href="#">Attachment Type</a>	<a href="#">Attachment Title</a>	<a href="#">Description</a>	<a href="#">Date Uploaded</a>	<a href="#">Part Number</a>	<a href="#">Attachment Hash</a>
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2022-2023

Annual Report for WDID 5S34I020075

List of Identified Pollutants within the Impaired Watershed

Parameter	Pollutant	Present at Facility?
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\* Does your facility storm water flow to one or more TMDL water bodies or watersheds listed in Attachment E? Not Selected

## Appendix B

### Vacuum Truck Loads of Water or Sludge

Transport	Description of Material	Date Removed	Manifest Number	Haz (RCRA) Cal Reg Non-Haz	Shipped To:	Weight (tons)
Vacuum Truck	Turbine Wash Water	1/4/2023	22-16054PW-001	Non-Haz	Casey Utilities	19.195
Vacuum Truck	Turbine Wash Water	1/4/2023	22-16054PW-002	Non-Haz	Casey Utilities	19.195
Vacuum Truck	Turbine Wash Water	1/16/2023	22-16054PW-003	Non-Haz	Casey Utilities	20.446
Vacuum Truck	Turbine Wash Water	1/16/2023	22-16054PW-004	Non-Haz	Casey Utilities	19.195
Vacuum Truck	Turbine Wash Water	2/13/2023	23-16045-002	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-004	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-006	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-005	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-003	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-001	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-002	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-004	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/4/2023	23-26006-007	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/3/2023	23-26006-008	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/13/2023	23-26006-009	Non-Haz	Casey Utilities	20.029
Vacuum Truck	ZLD Sump	4/13/2023	23-26006-010	Non-Haz	Casey Utilities	20.029
Vacuum Truck	Turbine Wash Water	4/25/2023	23-16102-001	Non-Haz	Casey Utilities	17.526
Vacuum Truck	Turbine Wash Water	5/10/2023	23-166018-002	Non-Haz	Casey Utilities	20.029
Vacuum Truck	Turbine Wash Water	11/10/2023	23-16018-003	NonHaz	Casey Utilities	16.691
					<b>SUM</b>	<b>372.627</b>

# Appendix C

## Painting Projects

**Flash Tank and vent - 2023 painting project at Cosumnes**

