DOCKETED	
Docket Number:	01-AFC-25C
Project Title:	Malburg Generating Station-Compliance
TN #:	261462
Document Title:	Malburg Generating Station Quarterly Compliance Report Q4 2024
Description:	N/A
Filer:	Elyse Engel
Organization:	Jacobs Engineering Group Inc.
Submitter Role:	Applicant
Submission Date:	1/30/2025 9:39:31 AM
Docketed Date:	1/30/2025

City of VERNON CALIFORNIA

January 30, 2025

NOTICE OF INTENT TO FILE
2024 Q4 Compliance Report for the
Malburg Generating Station (01-AFC-25C)

Dear Dr. Ali:

Attached please find the Quarterly Compliance Report for the Malburg Generating Station (01-AFC-25C), covering the operational period of October 1, 2024, through December 31, 2024. This report addresses all quarterly requirements identified in the Final Commission Decision for the Malburg Generating Station (Transaction Number [TN] #28746), as most recently amended on June 20, 2019, by the Errata to Staff Analysis of Petition to Amend the Final Commission Decision (TN #228444).

If you have any questions or need more information, please contact Matt Richards, Utilities Operations Manager, at MRichards@cityofvernon.org or (323) 583-8811 x378.

Thank you,

Todd Dusenberry
General Manager of Vernon Public Utilities

Copies: Lisa Umeda
Matt Richards
Richard Corbi
Elyse Engel
Document Control

Enclosure: MGS 2024 Q4 Compliance Report

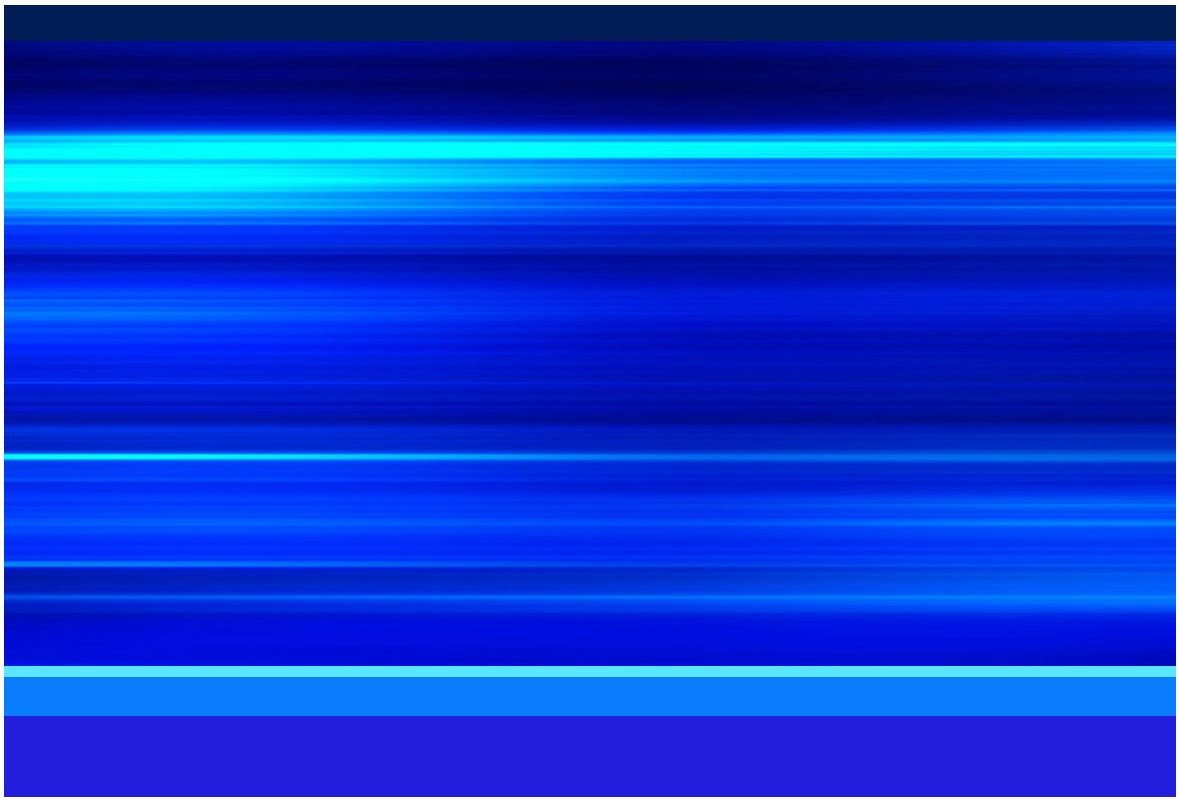
Malburg Generating Station Quarterly Compliance Report (Fourth Quarter 2024)

Submitted to
California Energy Commission

Submitted by
City of Vernon, Public Utilities Department

Document no: 250128074719_e1e1910f

January 30, 2025



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Acronyms and Abbreviations

CEC	California Energy Commission
CEMS	continuous emissions monitoring system
CO	carbon monoxide
COC	Conditions of Certification
CTGs	combustion turbine generators
DAHS	data acquisition and handling system
gr/scf	grain per standard cubic foot
HRSGs	heat recovery steam generators
lb/day	pounds per day
lb/hr	pounds per hour
MGS	Malburg Generating Station
NH_3	ammonia
NOx	nitrogen oxides
PM_{10}	particulate matter with aerodynamic diameter less than or equal to 10 microns
$PM_{2.5}$	particulate matter with aerodynamic diameter less than or equal to 2.5 microns
ppm	parts per million
ppmv	parts per million by volume
ppmw	parts per million by weight
QCR	Quarterly Compliance Report
RECLAIM	Regional Clean Air Incentives Market
SCAQMD	South Coast Air Quality Management District
SOx	sulfur oxides
STG	steam turbine generator
TDS	total dissolved solids
TN	Transaction Number
VOC	volatile organic compound

1. Introduction

This Quarterly Compliance Report (QCR) has been prepared to meet the California Energy Commission's (CEC) quarterly reporting requirements for the Malburg Generating Station (MGS). This QCR fulfills various Conditions of Certification (COC) described in the CEC's Final Commission Decision for the MGS (Transaction Number [TN] #28746), as most recently amended on June 20, 2019 by the Errata to Staff Analysis of Petition to Amend the Final Commission Decision (TN #228444).

1.1 Project Location and Description

The MGS is located at 4963 S Soto Street in Vernon, California. The property is approximately 3.4 acres in size, located in an industrial land use area near the geographic center of metropolitan Los Angeles County. MGS consists of two Siemens SGT-800 frame type natural gas combustion turbine generators (CTGs), two associated natural gas combustion duct burners, two heat recovery steam generators (HRSGs), a steam turbine generator (STG), a cooling tower, a diesel-fired emergency firewater pump, and support equipment.

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

1.2 Organization of the Quarterly Compliance Report

A summary of the compliance demonstration for each applicable COC is provided in Section 2 and includes references to Appendices and Tables as appropriate.

2. Required Quarterly Compliance Report Documentation

COC requirements associated with this QCR are summarized in the table below.

Table 2-1. Required Quarterly Compliance Report Documentation

Condition of Certification	Response
AQ-C6	The weekly total dissolved solids (TDS) results for the fourth quarter of 2024 are provided in Appendix A, Table 2; the weekly sample reports collected for the same period are provided in Appendix B.
AQ-C7	Daily particulate matter with aerodynamic diameter less than or equal to 10 microns (PM_{10}) emissions from cooling tower operation during the fourth quarter of 2024 are provided in Appendix A, Tables 3 through 5. As shown, emissions were below the specified limit of 6.2 pounds per day (lb/day).
AQ-C8	Testing times for the diesel-fired emergency firewater pump during the fourth quarter of 2024 are provided in Appendix C, Table 2. MGS refrained from testing the diesel-fired emergency firewater pump in the same hour the CTGs were either started or shutdown.
AQ-C9	The CTG startup and shutdown details for the fourth quarter of 2024, including the duration and date of occurrence, are provided in Appendix C, Table 1.

Condition of Certification	Response
AQ-C11	All ammonia (NH_3), nitrogen oxides (NOx), sulfur oxides (SOx), carbon monoxide (CO), PM_{10}, and volatile organic compound (VOC) emissions from MGS operation during the fourth quarter of 2024 are provided in Appendix A, Table 1B. Annual emissions of these same pollutants are provided in Appendix A, Table 1A.
AQ-2	Low sulfur diesel fuel was last purchased on March 20, 2024. The fuel purchase record is provided in Appendix D and demonstrates that the fuel does not contain sulfur compounds in excess of 15 parts per million by weight (ppmw).
AQ-3	See the response for COC AQ-2.
AQ-5	Monthly emissions of CO, PM_{10}, particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), VOC, and SOx from CTG and duct burner operation during the fourth quarter of 2024 are presented in Appendix A, Tables 7 through 9. Fuel usage for each turbine-duct burner pair is provided in Appendix A, Table 6. As shown, emissions were below the monthly limits specified in Condition A63.4 of the site's Title V Permit.
AQ-6	See the response for COC AQ-C9.
AQ-9	See the response for COC AQ-C11. Additionally, quarterly NOx excess emission reports from the data acquisition and handling system (DAHS) are provided in Appendix E. As demonstrated in these reports, there was one incident in which the maximum corrected NOx emissions concentration for CTG 2 exceeded the emission concentration limit of 2.0 parts per million by volume (ppmv); there were no similar incidents for CTG 1 during the reporting period. MGS submitted a Form 500-N for this emergency event resulting in excess emissions to the South Coast Air Quality Management District (SCAQMD) on November 20, 2024, following verbal notification on November 18, 2024; a copy of the submitted form is provided in Appendix F. All continuous emissions monitoring system (CEMS) data for MGS' CTGs are stored electronically onsite.
AQ-10	See the response for COC AQ-C11. Additionally, quarterly CO excess emission reports from the DAHS are provided in Appendix E. As demonstrated in these reports, there were no incidents in which the maximum corrected CO emissions concentration for either CTG exceeded the emission concentration limit of 2.0 ppmv. All CEMS data for MGS' CTGs are stored electronically onsite.
AQ-11	See the response for COC AQ-C11. Additionally, quarterly VOC excess emission reports from the DAHS are provided in Appendix E. As demonstrated in these reports, there were no incidents in which the maximum corrected VOC emissions concentration for either CTG exceeded the emission concentration limit of 2.0 ppmv. All CEMS data for MGS' CTGs are stored electronically onsite.
AQ-12	See the response for COC AQ-C11. Additionally, compliance with the specified limit of 5 parts per million (ppm) is demonstrated through annual or quarterly source testing. The most recent NH_3 compliance source testing for CTG 1 and CTG 2 was performed on March 13 and 14, 2024. The test report with results was submitted to the CEC on May 1, 2024, and indicated compliance with the emission limit (0.9 ppm for CTG 1 and 1.0 ppm for CTG 2). NH_3 emissions are also

Condition of Certification	Response
	calculated via the CEMS on an hourly basis and compared to the NH_3 concentration limit of 5 ppm as an indicator of process functionality.
AQ-13	See the response for COC AQ-C11. Additionally, the most recent triennial compliance source test, performed in July 2022, indicated compliance with the Rule 475 particulate matter emission limits of 5 kilograms per hour (11 pounds per hour [lb/hr]) or 23 milligrams per cubic meter (0.01 grain per standard cubic foot [gr/scf]) for both CTGs (0.67 lb/hr and 0.0003 gr/scf for CTG 1 and 1.83 lb/hr and 0.0007 gr/scf for CTG 2).
AQ-14	See the response for COC AQ-2.
AQ-15	Year-to-date hours of operation for the diesel-fired emergency firewater pump are provided in Appendix A, Table 10. As shown, the year-to-date 2024 hours for maintenance and testing did not exceed 50 hours and the total operational hours did not exceed 200 hours.
AQ-27	See the response for COC AQ-5. As shown, fuel consumption per turbine-duct burner pair did not exceed the specified limit of 405 million cubic feet per month.
AQ-32	The NOx Regional Clean Air Incentives Market (RECLAIM) annual emission allocation information for the MGS facility, received from the SCAQMD for compliance year 2024 – 2025, is provided in Appendix G.
AQ-36	See the responses for COCs AQ-5 and AQ-6.

Appendix A
MGS Emission Calculations

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 1

Reporting Period: Quarter 4 2024

Table 1A. Annual Emissions - Calendar Year 2024

Source	Annual Emissions (lb/year)					
	NOx[1]	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3
CTG 1 & Duct Burner	11,620	4,304	2,460	446	9,611	14,652
CTG 2 & Duct Burner	10,128	3,554	2,193	396	8,564	12,909
Cooling Tower	--	--	--	--	436	--
Diesel Firewater Pump	136	3.95	0.99	0.06	0.89	0.23
Total	**21,884**	**7,863**	**4,654**	**843**	**18,612**	**27,561**

[1] The annual emissions presented above incorporate 3rd quarter NOx emissions which have been revised to utilize actual CEMS-monitored data for several dates in July instead of data substituted using missing data procedures. A formal request to update the SCAQMD's RECLAIM records to match these revised values was made in January 2025.

Table 1B. Quarterly Emissions - October 1, 2024 through December 31, 2024

Source	Quarterly Emissions (lb/quarter)					
	NOx	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3
CTG 1 & Duct Burner	1,112	536	216	39.2	841	1,286
CTG 2 & Duct Burner	3,762	1,295	818	148	3,193	4,861
Cooling Tower	--	--	--	--	81.3	--
Diesel Firewater Pump	37.3	1.08	0.27	0.02	0.24	0.06
Total	**4,910**	**1,833**	**1,034**	**187**	**4,116**	**6,147**

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 2

Reporting Period: **Quarter 4 2024**

Table 2. Cooling Tower Total Dissolved Solids (TDS) Sampling Results [1,2]

Sampling Period		
Start Date	End Date	TDS (ppm)
9/29/2024	10/5/2024	4,120
10/6/2024	10/12/2024	3,540
10/13/2024	10/19/2024	4,100
10/20/2024	10/26/2024	3,960
10/27/2024	11/2/2024	3,560
11/3/2024	11/9/2024	4,260
11/10/2024	11/16/2024	4,000
11/17/2024	11/23/2024	3,960
11/24/2024	11/30/2024	4,280
12/1/2024	12/7/2024	--
12/8/2024	12/14/2024	--
12/15/2024	12/21/2024	--
12/22/2024	12/28/2024	--
12/29/2024	1/4/2025	--

[1] Sampling results taken from Positive Lab's Weekly Cooling Tower Blowdown Reports, as provided in Appendix B of the QCR.

[2] MGS was primarily offline during December 2024; therefore, cooling tower TDS samples were not collected during this time.

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 3

Reporting Period: **October 2024**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

Data Source: Positive Lab's Weekly Cooling Tower Blowdown Reports, as provided in Appendix B of the QCR

Sample Date	Period		TDS (ppm)
	Start Date	End Date	
9/30/2024	9/29/2024	10/5/2024	4,120
10/9/2024	10/6/2024	10/12/2024	3,540
10/14/2024	10/13/2024	10/19/2024	4,100
10/22/2024	10/20/2024	10/26/2024	3,960
10/28/2024	10/27/2024	11/2/2024	3,560

Methodology (per Condition of Certification [COC] AQ-C7)

PM_{10} Emissions (lb/day) = Circulation Rate (gal/day) x Density of Water (lb/gal) x Total Dissolved Solids (ppm) / 1,000,000 x Drift Factor (%) / 100 x Correction Factor

Constants

Parameter	Value
Circulation Rate per Pump (gal/min) [1]	13,500
Number of Pumps	2
Total Circulation Rate (gal/min)	27,000
Water Density (lb/gal)	8.334
Drift Factor (%) [2]	0.0005
Correction Factor (unitless) [3]	0.2

[1] Source: M3-10 Main Circulating Water System P&ID.

[2] Per COC AQ-C4.

[3] Source: SPX Cooling Technologies' Cooling Tower Drift Mass Distribution.

Cooling Tower Daily PM_{10} Emissions

Date	Circulation Rate (gal/day) [1]	TDS (ppm)	PM_{10} Emissions (lb/day)	Above 6.2 lb/day PM_{10} Limit? [2]
10/1/2024	38,880,000	4,120	1.33	No
10/2/2024	38,880,000	4,120	1.33	No
10/3/2024	38,880,000	4,120	1.33	No
10/4/2024	38,880,000	4,120	1.33	No
10/5/2024	38,880,000	4,120	1.33	No
10/6/2024	38,880,000	3,540	1.15	No
10/7/2024	38,880,000	3,540	1.15	No
10/8/2024	38,880,000	3,540	1.15	No
10/9/2024	38,880,000	3,540	1.15	No
10/10/2024	38,880,000	3,540	1.15	No
10/11/2024	38,880,000	3,540	1.15	No
10/12/2024	38,880,000	3,540	1.15	No
10/13/2024	38,880,000	4,100	1.33	No
10/14/2024	38,880,000	4,100	1.33	No
10/15/2024	38,880,000	4,100	1.33	No
10/16/2024	38,880,000	4,100	1.33	No
10/17/2024	38,880,000	4,100	1.33	No
10/18/2024	38,880,000	4,100	1.33	No
10/19/2024	38,880,000	4,100	1.33	No
10/20/2024	38,880,000	3,960	1.28	No
10/21/2024	38,880,000	3,960	1.28	No
10/22/2024	38,880,000	3,960	1.28	No
10/23/2024	38,880,000	3,960	1.28	No
10/24/2024	38,880,000	3,960	1.28	No
10/25/2024	38,880,000	3,960	1.28	No
10/26/2024	38,880,000	3,960	1.28	No
10/27/2024	38,880,000	3,560	1.15	No
10/28/2024	38,880,000	3,560	1.15	No
10/29/2024	38,880,000	3,560	1.15	No
10/30/2024	38,880,000	3,560	1.15	No
10/31/2024	38,880,000	3,560	1.15	No

[1] Maximum daily circulation rate conservatively used to estimate PM_{10} emissions when the cooling tower is operated for any part of the day. Circulation rate is zero for days the cooling tower is not operated at all.

[2] Daily emissions limit established in COC AQ-C7.

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 4

Reporting Period: **November 2024**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

Data Source: Positive Lab's Weekly Cooling Tower Blowdown Reports, as provided in Appendix B of the QCR

Sample Date	Period		TDS (ppm)
	Start Date	End Date	
10/28/2025	10/27/2024	11/2/2024	3,560
11/7/2025	11/3/2024	11/9/2024	4,260
11/12/2024	11/10/2024	11/16/2024	4,000
11/19/2024	11/17/2024	11/23/2024	3,960
11/25/2024	11/24/2024	11/30/2024	4,280

Methodology (per Condition of Certification [COC] AQ-C7)

PM_{10} Emissions (lb/day) = Circulation Rate (gal/day) x Density of Water (lb/gal) x Total Dissolved Solids (ppm) / 1,000,000 x Drift Factor (%) / 100 x Correction Factor

Constants

Parameter	Value
Circulation Rate per Pump (gal/min) [1]	13,500
Number of Pumps	2
Total Circulation Rate (gal/min)	27,000
Water Density (lb/gal)	8.334
Drift Factor (%) [2]	0.0005
Correction Factor (unitless) [3]	0.2

[1] Source: M3-10 Main Circulating Water System P&ID.

[2] Per COC AQ-C4.

[3] Source: SPX Cooling Technologies' Cooling Tower Drift Mass Distribution.

Cooling Tower Daily PM_{10} Emissions

Date	Circulation Rate (gal/day) [1]	TDS (ppm)	PM_{10} Emissions (lb/day)	Above 6.2 lb/day PM_{10} Limit? [2]
11/1/2024	38,880,000	3,560	1.15	No
11/2/2024	38,880,000	3,560	1.15	No
11/3/2024	38,880,000	4,260	1.38	No
11/4/2024	38,880,000	4,260	1.38	No
11/5/2024	38,880,000	4,260	1.38	No
11/6/2024	38,880,000	4,260	1.38	No
11/7/2024	38,880,000	4,260	1.38	No
11/8/2024	38,880,000	4,260	1.38	No
11/9/2024	38,880,000	4,260	1.38	No
11/10/2024	38,880,000	4,000	1.30	No
11/11/2024	38,880,000	4,000	1.30	No
11/12/2024	38,880,000	4,000	1.30	No
11/13/2024	38,880,000	4,000	1.30	No
11/14/2024	38,880,000	4,000	1.30	No
11/15/2024	38,880,000	4,000	1.30	No
11/16/2024	38,880,000	4,000	1.30	No
11/17/2024	38,880,000	3,960	1.28	No
11/18/2024	38,880,000	3,960	1.28	No
11/19/2024	38,880,000	3,960	1.28	No
11/20/2024	38,880,000	3,960	1.28	No
11/21/2024	38,880,000	3,960	1.28	No
11/22/2024	38,880,000	3,960	1.28	No
11/23/2024	38,880,000	3,960	1.28	No
11/24/2024	38,880,000	4,280	1.39	No
11/25/2024	38,880,000	4,280	1.39	No
11/26/2024	38,880,000	4,280	1.39	No
11/27/2024	38,880,000	4,280	1.39	No
11/28/2024	38,880,000	4,280	1.39	No
11/29/2024	38,880,000	4,280	1.39	No
11/30/2024	38,880,000	4,280	1.39	No

[1] Maximum daily circulation rate conservatively used to estimate PM_{10} emissions when the cooling tower is operated for any part of the day. Circulation rate is zero for days the cooling tower is not operated at all.

[2] Daily emissions limit established in COC AQ-C7.

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 5

Reporting Period: **December 2024**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

Data Source: Positive Lab's Weekly Cooling Tower Blowdown Reports, as provided in Appendix B of the QCR

Sample Date[1]	Period		TDS (ppm)
	Start Date	End Date	
11/25/2024	11/24/2024	11/30/2024	4,280
--	12/1/2024	12/7/2024	--
--	12/8/2024	12/14/2024	--
--	12/15/2024	12/21/2024	--
--	12/22/2024	12/28/2024	--
--	12/29/2024	1/4/2025	--

[1] MGS was primarily offline during December 2024; therefore, no cooling tower sample was collected during this time.

Methodology (per Condition of Certification [COC] AQ-C7)

PM_{10} Emissions (lb/day) = Circulation Rate (gal/day) x Density of Water (lb/gal) x Total Dissolved Solids (ppm) / 1,000,000 x Drift Factor (%) / 100 x Correction Factor

Constants

Parameter	Value
Circulation Rate per Pump (gal/min) [1]	13,500
Number of Pumps	2
Total Circulation Rate (gal/min)	27,000
Water Density (lb/gal)	8.334
Drift Factor (%) [2]	0.0005
Correction Factor (unitless) [3]	0.2

[1] Source: M3-10 Main Circulating Water System P&ID.

[2] Per COC AQ-C4.

[3] Source: SPX Cooling Technologies' Cooling Tower Drift Mass

Cooling Tower Daily PM_{10} Emissions

Date	Circulation Rate (gal/day) [1]	TDS (ppm)[3]	PM_{10} Emissions (lb/day)	Above 6.2 lb/day PM_{10} Limit? [2]
12/1/2024	38,880,000	4,280	1.39	No
12/2/2024	0	--	0.00	No
12/3/2024	0	--	0.00	No
12/4/2024	0	--	0.00	No
12/5/2024	0	--	0.00	No
12/6/2024	0	--	0.00	No
12/7/2024	0	--	0.00	No
12/8/2024	0	--	0.00	No
12/9/2024	0	--	0.00	No
12/10/2024	0	--	0.00	No
12/11/2024	0	--	0.00	No
12/12/2024	0	--	0.00	No
12/13/2024	0	--	0.00	No
12/14/2024	0	--	0.00	No
12/15/2024	0	--	0.00	No
12/16/2024	0	--	0.00	No
12/17/2024	0	--	0.00	No
12/18/2024	0	--	0.00	No
12/19/2024	0	--	0.00	No
12/20/2024	0	--	0.00	No
12/21/2024	0	--	0.00	No
12/22/2024	0	--	0.00	No
12/23/2024	0	--	0.00	No
12/24/2024	0	--	0.00	No
12/25/2024	0	--	0.00	No
12/26/2024	0	--	0.00	No
12/27/2024	0	--	0.00	No
12/28/2024	0	--	0.00	No
12/29/2024	0	--	0.00	No
12/30/2024	38,880,000	4,280	1.39	No
12/31/2024	0	--	0.00	No

[1] Maximum daily circulation rate conservatively used to estimate PM_{10} emissions when the cooling tower is operated for any part of the day. Circulation rate is zero for days the cooling tower is not operated at all.

[2] Daily emissions limit established in COC AQ-C7.

[3] MGS was primarily offline during December 2024 for outage maintenance; therefore, a Cooling Tower Blowdown Report was not prepared during this time. For days that MGS did operate during December 2024, sample results were assumed to be best represented by the results sampled on November 25, 2024.

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Tables 6, 7, 8, & 9

Reporting Period: Quarter 4 2024

Table 6. Monthly Turbine-Duct Burner Fuel Flow

Source	October		November		December	
	Fuel Flow (MMscf/month) [1]	Above 405 MMscf/month Limit? [2]	Fuel Flow (MMscf/month) [1]	Above 405 MMscf/month Limit? [2]	Fuel Flow (MMscf/month) [1]	Above 405 MMscf/month Limit? [2]
CTG 1	135		2.88		0.66	
CTG 1 Duct Burner	1.49		0.00		0.00	
Total CTG 1 & Duct Burner	**136**	**No**	**2.88**	**No**	**0.66**	**No**
CTG 2	256		271		1.22	
CTG 2 Duct Burner	2.03		1.29		0.00	
Total CTG 2 & Duct Burner	**258**	**No**	**272**	**No**	**1.23**	**No**

[1] CTG and Duct Burner fuel flow data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel' and 'All_12MonthSummary_GasUsage' RegPerfect Reports.

[2] Monthly fuel flow limit is per Condition of Certification (COC) AQ-27.

Table 7. Monthly Emissions - October 2024

Source	Monthly Emissions (lb/month) [1]					
	NOx [2]	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3 [3]
CTG 1 & Duct Burner	998	375	210	38.2	820	1,254
CTG 2 & Duct Burner	1,808	581	397	71.8	1,550	2,363
Monthly Emission Limits [4]	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

[1] Unless otherwise noted, monthly emissions data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel' RegPerfect Report.

[2] Monthly NOx emissions are as submitted to SCAQMD, based on the 'U1_U2MonthlyRECLAIMNOxSummaryByDay' RegPerfect Report.

[3] Monthly NH_3 emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Procedures - June 2020. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

[4] Monthly emission limits are per COC AQ-5.

Table 8. Monthly Emissions - November 2024

Source	Monthly Emissions (lb/month) [1]					
	NOx [2]	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3 [3]
CTG 1 & Duct Burner	61.4	83.8	4.44	0.81	17.3	26.2
CTG 2 & Duct Burner	1,894	604	419	75.8	1,636	2,487
Monthly Emission Limits [4]	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

[1] Unless otherwise noted, monthly emissions data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel' RegPerfect Report.

[2] Monthly NOx emissions are as submitted to SCAQMD, based on the 'U1_U2MonthlyRECLAIMNOxSummaryByDay' RegPerfect Report.

[3] Monthly NH_3 emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Procedures - June 2020. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

[4] Monthly emission limits are per COC AQ-5.

Table 9. Monthly Emissions - December 2024

Source	Monthly Emissions (lb/month) [1]					
	NOx [2]	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3 [3]
CTG 1 & Duct Burner	51.7	77.8	1.02	0.19	3.98	6.02
CTG 2 & Duct Burner	60.0	110	1.89	0.35	7.37	11.2
Monthly Emission Limits [4]	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

[1] Unless otherwise noted, monthly emissions data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel' RegPerfect Report.

[2] Monthly NOx emissions are as submitted to SCAQMD, based on the 'U1_U2MonthlyRECLAIMNOxSummaryByDay' RegPerfect Report.

[3] Monthly NH_3 emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Procedures - June 2020. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

[4] Monthly emission limits are per COC AQ-5.

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 10

Reporting Period: **Quarter 4 2024**

Methodology

Emissions (lb/month) = Fuel Usage (gal/month) / 1,000 (gal/Mgal) x Emission Factor (lb/Mgal)

Emission Factors

Pollutant	Emission Factor (lb/Mgal)	Reference
NOx	469	Emission factor provided in the facility's Title V Permit.
CO	13.62	Emission factor converted from the factor provided in the facility's Title V Permit (0.4 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
VOC	3.41	Emission factor converted from the factor provided in the facility's Title V Permit (0.1 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
SOx	0.21	Default for Diesel/Distillate Oil, ICEs given in the SCAQMD's Combustion Default Emission Factors - January 2022.
$PM_{10}/PM_{2.5}$	3.065	Emission factor converted from the factor provided in the facility's Title V Permit (0.09 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
NH_3	0.80	Default for diesel combustion equipment without an SNCR or SCR given in the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Reporting Procedures - June 2020.

Table 10. Monthly Diesel Fire Pump Hours of Operation, Fuel Usage, and Emissions

Month	Monthly Hours of Operation [1]			Fuel Usage (gal/month) [2]	Monthly Emissions (lb/month)					
	Maintenance	Testing	Emergency		NOx	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3
January	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
February	0.0	1.5	0.0	16.8	7.9	0.23	0.06	0.00	0.05	0.01
March	0.0	2.6	0.0	29.1	13.7	0.40	0.10	0.01	0.09	0.02
April	0.0	2.6	0.0	29.1	13.7	0.40	0.10	0.01	0.09	0.02
May	0.0	1.7	0.0	19.0	8.9	0.26	0.06	0.00	0.06	0.02
June	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
July	0.0	2.4	0.0	26.9	12.6	0.37	0.09	0.01	0.08	0.02
August	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
September	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
October	0.0	2.6	0.0	29.1	13.7	0.40	0.10	0.01	0.09	0.02
November	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
December	0.0	2.5	0.0	28.0	13.1	0.38	0.10	0.01	0.09	0.02
Q1 Total	**0.0**	**6.1**	**0.0**	**68.3**	**32.0**	**0.9**	**0.2**	**0.0**	**0.2**	**0.1**
Q2 Total	**0.0**	**6.3**	**0.0**	**70.6**	**33.1**	**1.0**	**0.2**	**0.0**	**0.2**	**0.1**
Q3 Total	**0.0**	**6.4**	**0.0**	**71.7**	**33.6**	**1.0**	**0.2**	**0.0**	**0.2**	**0.1**
Q4 Total	**0.0**	**7.1**	**0.0**	**79.5**	**37.3**	**1.1**	**0.3**	**0.0**	**0.2**	**0.1**
Annual Total	**0.0**	**25.9**	**0.0**	**290.1**	**136.0**	**4.0**	**1.0**	**0.1**	**0.9**	**0.2**
Annual Limit for Maintenance and Testing [3]			50							
Total Annual Limit [3]			200							
Exceeds Limits?			No							

[1] Monthly hours of operation calculated from Device 385/403 run timer readings.

[2] Fuel usage (gal/month) calculated by multiplying the hours of operation by the unit's maximum fuel throughput (11.2 gal/hour).

[3] Annual limits for hours of operation are per Condition of Certification (COC) AQ-15.

Appendix B
Cooling Tower Blowdown Reports

POSITIVE
LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

October 07, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2409182
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on September 30, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

The laboratory report may not be reproduced, except in full, without the written approval of the laboratory. The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) are provided on the final report only.

If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 10/07/24
Submitted: 09/30/24
PLS Report No.: 2409182

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2409182-01) Sampled: 09/30/24 07:35 Received: 09/30/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4120**		1	mg/L	5.0	- SM 2540C	10/03/24	10/04/24	ss	BJ40407

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BJ40407 - -										
Blank	**Prepared: 10/03/24 Analyzed: 10/04/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 10/03/24 Analyzed: 10/04/24**									
Total Dissolved Solids	54.0	5.0	mg/L	50.00		108	80-120			
Duplicate **Source: 2409182-01**	**Prepared & Analyzed: 10/04/24**									
Total Dissolved Solids	4170	5.0	mg/L		4120			1.13	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parlier

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE
781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 9.30.24 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2409182

CLIENT NAME: CITY OF VERNON PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY P.O.NO. AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP 0.0°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.0°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 60

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	9.30.24	0735	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): MA

Received by (Signature & Name): Tom Barie

Date: 9.30.24 Time: 0735

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date: Time:

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date: Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 9.30.24 0915

POSITIVE
LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

October 14, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2410062
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 09, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

The laboratory report may not be reproduced, except in full, without the written approval of the laboratory. The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) are provided on the final report only.

If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

File #:74548
Report Date: 10/14/24
Submitted: 10/09/24
PLS Report No.: 2410062

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2410062-01) Sampled: 10/09/24 08:50 Received: 10/09/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3540**		1	mg/L	5.0	- SM 2540C	10/10/24	10/11/24	ss	BJ41411

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BJ41411 - -										
Blank	**Prepared: 10/10/24 Analyzed: 10/11/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 10/10/24 Analyzed: 10/11/24**									
Total Dissolved Solids	52.0	5.0	mg/L	50.00		104	80-120			
Duplicate **Source: 2410063-01**	**Prepared: 10/10/24 Analyzed: 10/11/24**									
Total Dissolved Solids	587	5.0	mg/L		585			0.285	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 10.9.24 PAGE: 1 OF _____

FILE NO.: _____ LAB NO.: 2410062

CLIENT NAME: CITY OF VERNON | PROJECT NAME/NO.: MALBURG GENERATING STATION WEEKLY | P.O.NO.: | AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 | OBSERVED TEMP: 1.3°C

PROJECT MANAGER: MATT RICHARDS | PHONE NO: | FAX NO: | CORRECTED TEMP: 2.3°C

SAMPLER NAME: JOHN BARIE | SIGNATURE: | THERMO ID: 66

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
	10/9/24	0850	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name): MA | Received by (Signature & Name): J Barie | Date: 10.9.24 | Time: 0850

Relinquished by (Signature& Name): | Received by (Signature & Name): | Date: | Time:

Relinquished by (Signature& Name): | Received by (Signature & Name): | Date: | Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 10.9.24 1047

POSITIVE
LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

October 21, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2410097
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 14, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

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If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 10/21/24
Submitted: 10/14/24
PLS Report No.: 2410097

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2410097-01) Sampled: 10/14/24 08:50 Received: 10/14/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4100**		1	mg/L	5.0	- SM 2540C	10/18/24	10/18/24	ss	BJ41816

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BJ41816 - -										
Blank	**Prepared & Analyzed: 10/18/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared & Analyzed: 10/18/24**									
Total Dissolved Solids	42.0	5.0	mg/L	50.00		84.0	80-120			
Duplicate **Source: 2410097-01**	**Prepared & Analyzed: 10/18/24**									
Total Dissolved Solids	4130	5.0	mg/L		4100			0.527	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE
781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 10/14/24 PAGE: 1 OF

FILE NO.: LAB NO.: 2410097

CLIENT NAME: CITY OF VERNON PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY P.O.NO. AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 OBSERVED TEMP 0.0°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.2°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 60

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
	10/14/24	0850	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name): MA Received by (Signature & Name): Jen Barie Date: 10/14/24 Time: 0850

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 10/14/24 925

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

October 28, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2410139
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 22, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

The laboratory report may not be reproduced, except in full, without the written approval of the laboratory. The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) are provided on the final report only.

If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 10/28/24
Submitted: 10/22/24
PLS Report No.: 2410139

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2410139-01) Sampled: 10/22/24 08:55 Received: 10/22/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3960**		1	mg/L	5.0	- SM 2540C	10/24/24	10/25/24	ss	BJ42510

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BJ42510 - -										
Blank	**Prepared: 10/24/24 Analyzed: 10/25/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 10/24/24 Analyzed: 10/25/24**									
Total Dissolved Solids	45.0	5.0	mg/L	50.00		90.0	80-120			
Duplicate Source: 2410155-03	**Prepared: 10/24/24 Analyzed: 10/25/24**									
Total Dissolved Solids	740	5.0	mg/L		745			0.673	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parlier

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE
781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 10.22.24 PAGE: 1 OF ____

FILE NO.: ____ LAB NO.: 2410139

CLIENT NAME: CITY OF VERNON | PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY | P.O.NO. | AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 | ANALYSES REQUESTED | OBSERVED TEMP 1.3°C

PROJECT MANAGER MATT RICHARDS | PHONE NO: | FAX NO: | CORRECTED TEMP: 2.3°C

SAMPLER NAME: JOHN BARIE | SIGNATURE: | THERMO ID: 66

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE		
	10.22.24	0855	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:
MA	Tom Barie	10.22.24	0855
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 10.22.24 1025

POSITIVE
LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

November 04, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2410172
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 28, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

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If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 11/04/24
Submitted: 10/28/24
PLS Report No.: 2410172

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2410172-01) Sampled: 10/28/24 07:45 Received: 10/28/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3560**		1	mg/L	5.0	- SM 2540C	10/31/24	11/01/24	ss	BK40114

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BK40114 - -										
Blank	**Prepared: 10/31/24 Analyzed: 11/01/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 10/31/24 Analyzed: 11/01/24**									
Total Dissolved Solids	58.0	5.0	mg/L	50.00		116	80-120			
Duplicate **Source: 2410172-01**	**Prepared: 10/31/24 Analyzed: 11/01/24**									
Total Dissolved Solids	3550	5.0	mg/L		3560			0.515	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Daren Parlin

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE
781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 10.28.24 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2410172

CLIENT NAME: CITY OF VERNON PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY P.O.NO. AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP 0.0°

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.0°

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 66

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	10.28.24	0745	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): MA Received by (Signature & Name): Jose Barie Date: 10.28.24 Time: 0745

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 10.28.24 0820

POSITIVE
LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

November 14, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2411046
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 07, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

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If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Rick Owen Parker
Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 11/14/24
Submitted: 11/07/24
PLS Report No.: 2411046

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2411046-01) Sampled: 11/07/24 08:00 Received: 11/07/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4260**		1	mg/L	5.0	- SM 2540C	11/13/24	11/14/24	ss	BK41405

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BK41405 - -										
Blank	**Prepared: 11/13/24 Analyzed: 11/14/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 11/13/24 Analyzed: 11/14/24**									
Total Dissolved Solids	55.0	5.0	mg/L	50.0		110	80-120			
Duplicate **Source: 2411075-01**	**Prepared: 11/13/24 Analyzed: 11/14/24**									
Total Dissolved Solids	4090	5.0	mg/L		4000			2.02	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parlier

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE
781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 11.7.24 PAGE: 1 OF ____

FILE NO.: LAB NO.: 2411046

CLIENT NAME: CITY OF VERNON PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY P.O.NO. AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP 0.9°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.9°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 60

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	11.7.24	0800	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): MA Received by (Signature & Name): J. Barie Date: 11.7.24 Time: 0800

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 11.7.24 1100

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

November 15, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2411075
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 12, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

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If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 11/15/24
Submitted: 11/12/24
PLS Report No.: 2411075

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2411075-01) Sampled: 11/12/24 07:40 Received: 11/12/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4000**		1	mg/L	5.0	- SM 2540C	11/13/24	11/14/24	ss	BK41405

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BK41405 - -										
Blank	**Prepared: 11/13/24 Analyzed: 11/14/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 11/13/24 Analyzed: 11/14/24**									
Total Dissolved Solids	55.0	5.0	mg/L	50.0		110	80-120			
Duplicate **Source: 2411075-01**	**Prepared: 11/13/24 Analyzed: 11/14/24**									
Total Dissolved Solids	4090	5.0	mg/L		4000			2.02	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE
781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 11-12-24 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2411075.

CLIENT NAME: CITY OF VERNON PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY P.O.NO.

ADDRESS: 4963 SOTO ST. VERNON CA 90058

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO:

SAMPLER NAME: JOHN BARIE SIGNATURE:

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

AIRBILL NO:

OBSERVED TEMP 0.0°C

CORRECTED TEMP: 1.0°C

THERMO ID: 66

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		ANALYSES REQUESTED								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE	TDS								
	11-12-24	0740	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): MA

Received by (Signature & Name): John Barie

Date: 11-12-24 Time: 0740

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date: Time:

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date: Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 11-12-24 1005

POSITIVE
LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

November 25, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2411153
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 19, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

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If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 11/25/24
Submitted: 11/19/24
PLS Report No.: 2411153

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2411153-01) Sampled: 11/19/24 07:15 Received: 11/19/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3960**		1	mg/L	5.0	- SM 2540C	11/21/24	11/22/24	ss	BK42216

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BK42216 - -										
Blank	**Prepared: 11/21/24 Analyzed: 11/22/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 11/21/24 Analyzed: 11/22/24**									
Total Dissolved Solids	50.0	5.0	mg/L	50.0		100	80-120			
Duplicate **Source: 2411172-01**	**Prepared: 11/21/24 Analyzed: 11/22/24**									
Total Dissolved Solids	4910	5.0	mg/L		4930			0.339	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parkin

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE
781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 11/9/24 PAGE: 1 OF ____

FILE NO.: ____ LAB NO.: 2411153

CLIENT NAME: CITY OF VERNON | PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY | P.O.NO. | AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 | ANALYSES REQUESTED | OBSERVED TEMP: 0-5°C

PROJECT MANAGER: MATT RICHARDS | PHONE NO: | FAX NO: | CORRECTED TEMP: 1-5°

SAMPLER NAME: JOHN BARIE | SIGNATURE: | THERMO ID: 60

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- ---

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
	11/9/24	0715	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:
NA	[signature] Jem Barie	11/9/24	0715
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____days,

By: _____ Date: _____

SPECIAL INSTRUCTION: 11/9/24 1020

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab

POSITIVE
LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

December 02, 2024

Matt Richards
City of Vernon
4963 Soto St.
Vernon, CA 90058

Report No.: 2411207
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 25, 2024.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. Analytes flagged ANC are not offered by ELAP for certification. Analytes flagged ANA are offered by ELAP; however, they are not PLS certified.

 The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) are provided on the final report only.

If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 12/02/24
Submitted: 11/25/24
PLS Report No.: 2411207

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2411207-01) Sampled: 11/25/24 09:30 Received: 11/25/24

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4280**		1	mg/L	5.0	- SM 2540C	11/26/24	11/27/24	ss	BK42707

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BK42707 - -										
Blank	**Prepared: 11/26/24 Analyzed: 11/27/24**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 11/26/24 Analyzed: 11/27/24**									
Total Dissolved Solids	50.0	5.0	mg/L	50.0		100	80-120			
Duplicate **Source: 2411207-01**	**Prepared: 11/26/24 Analyzed: 11/27/24**									
Total Dissolved Solids	4260	5.0	mg/L		4280			0.585	5	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Rick Owen Parlier

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: 11-25-24 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2411207

CLIENT NAME: CITY OF VERNON PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY P.O.NO. AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP 1.5°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 2.7°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 60

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal

CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other

UST PROJECT: Y N GLOBAL ID#: --- --- --- --- --- --- --- --- --- --- ---

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS							SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE								
	11-25-24	09 30	COOLING TOWER BLOWDOWN	X				N	1	P	X							

Relinquished by (Signature& Name): MA Received by (Signature & Name): J. Barie Date: 11-25-24 Time: 0930

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

Relinquished by (Signature& Name): Received by (Signature & Name): Date: Time:

SAMPLE DISPOSITION

1. Samples returned to client? Yes No
2. Samples will not be stored over 30 days, unless additional storage time is requested
3. Storage time requested: _____ days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

PRESERVATIVE 1-HNO3 2-H2SO4 3-HCL 4- ZINC ACETATE 5-NaOH 6-NH4 BUFFER 7- OTHER

Arrived at the lab 11-25-24 1015

Appendix C
Operation Logs

Malburg Generating Station
Appendix C, Table 1
Combustion Turbine Generator (CTG) Startup and Shutdown Events
During Quarter 4, 2024

CTG 1 [2]

Date	Event Type [1]	Event Start	Event End	Duration (hrs:min)
10/13/2024	Stop	08:45	08:55	0:10
10/23/2024	Cold Start	16:01	17:18	1:17
10/29/2024	Stop	00:01	00:10	0:09
11/25/2024	Cold Start	03:57	05:17	1:20
11/25/2024	Stop	14:06	14:15	0:09
12/30/2024	Cold Start	13:20	14:38	1:18
12/30/2024	Stop	15:46	15:55	0:09

CTG 2

Date	Event Type [1]	Event Start	Event End	Duration (hrs:min)
10/1/2024	Cold Start	15:43	16:59	1:16
11/27/2024	Trip / Shutdown	23:20	23:20	0:00
11/28/2024	Hot Start	03:42	04:47	1:05
12/1/2024	Stop	00:04	00:12	0:08
12/30/2024	Cold Start	10:02	11:43	1:41
12/30/2024	Stop	14:22	14:30	0:08

[1] A startup event is defined as initiation of combustion until the system becomes emissions compliant, for consistency with the Title V Permit definitions.

[2] With this submittal, a correction is also being made to a previously-reported warm start on September 13, 2024. This event started at 20:49 and ended at 22:18, with a total duration of 1 hour and 29 minutes.

Malburg Generating Station
Appendix C, Table 2
Diesel Firewater Pump Testing Times
During Quarter 4, 2024

Date	Time (hh:mm)	Start Hours	End Hours	Event Type	Hours of Operation
10/2/2024	12:52	400.5	401.0	Testing	0.5
10/8/2024	9:49	401.0	401.5	Testing	0.5
10/15/2024	12:56	401.5	402.0	Testing	0.5
10/22/2024[1]	11:10	402.1	402.6	Testing	0.6
10/29/2024	12:23	402.6	403.1	Testing	0.5
11/5/2024	9:05	403.1	403.6	Testing	0.5
11/12/2024	13:01	403.6	404.1	Testing	0.5
11/19/2024	12:11	404.1	404.6	Testing	0.5
11/26/2024	10:35	404.6	405.1	Testing	0.5
12/6/2024	9:46	405.1	405.6	Testing	0.5
12/10/2024	8:42	405.6	406.1	Testing	0.5
12/22/2024	10:23	406.1	406.6	Testing	0.5
12/24/2024	10:29	406.6	407.1	Testing	0.5
12/31/2024	10:19	407.1	407.6	Testing	0.5

[1] Engine was test started to troubleshoot a report of an exhaust leak.

Appendix D
Diesel Fuel Oil Purchase Records

SALES QUOTE

ORDER NUMBER: 2607075

DATE:3/20/2024

TERMS: N30
SALES REP: Todd Cripps
PHONE: 714-938-5714

PO#: 00240083
SHIP DATE: 12/31/5999
ROM:
SHIP VIA:
WHSE: 101

SC Commercial, LLC, DBA SC Fuels
1800 West Katella Ave., Suite 400
P.O. Box 14237, Orange, CA 92863-4159

Ph: (800) 659-5823 Credit Inquiries: (888) SCFUELS Ext. 6017

ACCT NO (Bill-to): 01-0001045

CITY OF VERNON
4305 SANTA FE AVE
ATTN: DEPARTMENT D
VERNON, CA 90058
(323) 583-8811

ACCT NO (Ship-to) **01-0001045 103L**

CITY OF VERNON-SOTO ST-L
4963 SOTO ST
VERNON, CA 90058

HM	ITEM CODE	ITEM DESCRIPTION	QTY ORDERED	QTY DEL	PACKAGE DESC	EXTENDED QTY	UNIT PRICE	EXT PRICE
	O:TODD/POC:ROB 323-583-8811 X257/HRS:8A-2P							
X	**NA1993, DIESEL FUEL, 3 PG III / CARGO TANK**							
	693D055	R99 DYED RENEWABLE CARB DIESEL MAXIMUM 15 PPM SULFUR, DIESEL FUEL #2. MEETS ALL CARB DIESEL SPECS. For use in State of California NON TAXABLE USE ONLY PENALTY FOR TAXABLE USE.	2.00		55 G DR	110.00 GALS	6.06	666.86
	Federal Lust					0.00100		0.11
						6.06340		666.97
	CH253090981D055	CH GST ADVANTAGE EP 32 250054981 REPLACES-GST 2300 ISO 32 253090981	1.00	____	55 G DR	55.00 GALS	25.24	1,388.20
	DRUMDEPOSITC001	DRUM DEPOSIT FEE	3.00	____	MISC CHRG	3.00 EACH	25.00	75.00
	/FUELCHLUBE	FUEL SURCHARGE LUBES		____				9.92
	/RCFLUBE	REG COMPLIANCE FEE LUBES		____				12.95

**Prices quoted are not firm and are subject to change based upon product availablity, quantity delivered and market fluctuations

Net Order:	2,153.04
Less Discount:	0.00
Freight:	0.00
Sales Tax:	212.99
Order Total:	2,366.03

created by:crippsto1

ver. SCF20240320

www.scfuels.com

FOR CHEMICAL EMERGENCY
Spill, Leak, Fire Exposure or Accident
CALL CHEMTREC - DAY OR NIGHT
(800) 424-9300

Appendix E
Excess Emission Reports

Startup/Shutdown Excess Emissions Report

U1 CO Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:51 **Location:** Vernon, California

Tag Name: U1_CO_LbPerHr_1M

SI = SampleInvalid, * = Excess Emission

Total Operating Time: 437.02 Hours

Non-Operating Time: 1,770.98 Hours Report Time: 2,208.00 Hours

Unit Operation

Event Period				Reason	Action
Begin/End	Duration in Minute(s)	Lb/Event	Limit	Code - Description	Code - Description

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 CO Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:51 **Location:** Vernon, California

Tag Name: U1_CO_LbPerHr_1M

SI = SampleInvalid, * = Excess Emission

Total Operating Time: 437.02 Hours

Non-Operating Time: 1,770.98 Hours Report Time: 2,208.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 NOx Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:52 **Location:** Vernon, California

Tag Name: U1_NOxRECLM_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 437.02 Hours

Non-Operating Time: 1,770.98 Hours Report Time: 2,208.00 Hours

Unit Operation

Event Period				Reason	Action
Begin/End	Duration in Minute(s)	Lb/Event	Limit	Code - Description	Code - Description

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 NOx Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:52 **Location:** Vernon, California

Tag Name: U1_NOxRECLM_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 437.02 Hours

Non-Operating Time: 1,770.98 Hours Report Time: 2,208.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 VOC Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:52 **Location:** Vernon, California

Tag Name: U1_VOC_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 437.02 Hours

Non-Operating Time: 1,770.98 Hours Report Time: 2,208.00 Hours

Unit Operation

Event Period				Reason	Action
Begin/End	Duration in Minute(s)	Lb/Event	Limit	Code - Description	Code - Description

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 VOC Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:52 **Location:** Vernon, California

Tag Name: U1_VOC_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 437.02 Hours

Non-Operating Time: 1,770.98 Hours Report Time: 2,208.00 Hours

No invalid events were found in the reporting period.

Excess Emission Report

Unit 1 - CO ppmvdc 1-hour during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:57 **Location:** Vernon, California

Tag Name: U1_CONormal_Ppmvdc_1H
Total Operating Time: 440.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,768.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**440.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 1 - NOx ppmvdc 1-hour during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:57 **Location:** Vernon, California

Tag Name: U1_NOxNormal_Ppmvdc_1H
Total Operating Time: 440.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,768.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**440.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 1 - VOC ppmvdc 1-hour during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:57 **Location:** Vernon, California

Tag Name: U1_VOCNormal_Ppmvdc_1H
Total Operating Time: 440.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,768.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**440.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 1 - CO ppmvdc 3-hour Rolling during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:56 **Location:** Vernon, California

Tag Name: U1_CO_3HrRoll_Ppmvdc_1H
Total Operating Time: 440.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,768.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**440.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Quad K Excess Emissions Report

U1 NOX 4-Hour Events

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:50 **Location:** Vernon, California

Tag Name: U1_NOx4H_Ppmvdc_1H
Total Operating Time: 440.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,768.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**440.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Startup/Shutdown Event Report

U2 CO Startup/Shutdown Events

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:53 **Location:** Vernon, California

Tag Name: U2_CO_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,449.65 Hours

Non-Operating Time: 758.35 Hours Report Time: 2,208.00 Hours

Unit Operation

Event Period				Reason	Action
Begin/End	Duration in Minute(s)	Lb/Event	Limit	Code - Description	Code - Description

No excess emissions were found in the reporting period.

Startup/Shutdown Event Report

U2 CO Startup/Shutdown Events

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:53 **Location:** Vernon, California
Tag Name: U2_CO_LbPerHr_1M SI = SampleInvalid, * = Excess Emission
Total Operating Time: 1,449.65 Hours
Non-Operating Time: 758.35 Hours Report Time: 2,208.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U2 NOx Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:54 **Location:** Vernon, California

Tag Name: U2_NOxRECLM_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,449.65 Hours

Non-Operating Time: 758.35 Hours Report Time: 2,208.00 Hours

Unit Operation

Event Period				Reason	Action
Begin/End	Duration in Minute(s)	Lb/Event	Limit	Code - Description	Code - Description

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U2 NOx Startup/Shutdown

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:54 **Location:** Vernon, California

Tag Name: U2_NOxRECLM_LbPerHr_1M

SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,449.65 Hours

Non-Operating Time: 758.35 Hours Report Time: 2,208.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Event Report

U2 VOC Startup/Shutdown Events

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:55 **Location:** Vernon, California

Tag Name: U2_VOC_LbPerHr_1M

SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,449.65 Hours

Non-Operating Time: 758.35 Hours Report Time: 2,208.00 Hours

Unit Operation

Event Period				Reason	Action
Begin/End	Duration in Minute(s)	Lb/Event	Limit	Code - Description	Code - Description

No excess emissions were found in the reporting period.

Startup/Shutdown Event Report

U2 VOC Startup/Shutdown Events

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/11/2025 14:55 **Location:** Vernon, California

Tag Name: U2_VOC_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,449.65 Hours

Non-Operating Time: 758.35 Hours Report Time: 2,208.00 Hours

No invalid events were found in the reporting period.

Excess Emission Report

Unit 2 - CO ppmvdc 1-hour during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:59 **Location:** Vernon, California

Tag Name: U2_CONormal_Ppmvdc_1H
Total Operating Time: 1,453.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 755.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**1,453.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 2 - NOx ppmvdc 1-hour during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 15:00 **Location:** Vernon, California

Tag Name: U2_NOxNormal_Ppmvdc_1H
Total Operating Time: 1,453.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 755.00 Hour(s) Report Time: 2,208.00 Hour(s)

Inc No	Start Time	End Time	Duration in Hour(s)	Average	Limit	Maximum	Reason Code	Action Code
1	11/18/24 08:00	11/18/24 08:59	1	2.3	2.0	2.3		

Total Operating Time:	**1,453.00 Hour(s)**
Total Duration (Online only):	**1.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.07 %**
Time in compliance as a percentage of operating time:	**99.93 %**

Excess Emission Report

Unit 2 - VOC ppmvdc 1-hour during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 15:00 **Location:** Vernon, California

Tag Name: U2_VOCNormal_Ppmvdc_1H
Total Operating Time: 1,453.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 755.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**1,453.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 2 - CO ppmvdc 3-hour Rolling during Normal Operation

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:56 **Location:** Vernon, California

Tag Name: U2_CO_3HrRoll_Ppmvdc_1H
Total Operating Time: 1,453.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 755.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**1,453.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Quad K Excess Emissions Report

U2 NOX 4-Hour Events

From: 10/01/2024 00:00 **To:** 12/31/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/11/2025 14:50 **Location:** Vernon, California

Tag Name: U2_NOx4H_Ppmvdc_1H
Total Operating Time: 1,453.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 755.00 Hour(s) Report Time: 2,208.00 Hour(s)

No incidents have been reported for this reporting period. Data is 100% in compliance.

Total Operating Time:	**1,453.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Appendix F
NOx Excess Emissions Supporting Documentation

City of VERNON CALIFORNIA

November 20, 2024

NOTICE OF INTENT TO FILE
Form 500-N for Deviation Event with Excess Emissions on 11/18/2024
Vernon Public Utilities, SCAQMD Facility ID 195802

Dear Mr. Revilla:

Attached is Form 500-N for a November 18, 2024 deviation event resulting in excess emissions of NO_x at Vernon Public Utilities, Facility ID 195802, Supporting documentation is also provided, where warranted.

A grid disturbance was the cause of the deviation. This emergency required verbal notification to the South Coast Air Quality Management District (SCAQMD) within 1 hour. As soon as the site personnel mitigated excess emissions, then they notified Jacobs of the event and provided details at 10:06 AM. Jacobs confirmed it was an excess emissions event due to an emergency and notified SCAQMD at 10:59 AM.

Please contact Matt Richards at (323) 583-8811 ext. 378 (email address: MRichards@cityofvernon.org) or Sarah Jensen at (585) 261-8736 (email address: Sarah.Jensen@jacobs.com) if you have any questions or if you need additional information.

Sincerely,

Todd Dusenberry
General Manager of Vernon Public Utilities

cc: Lisa Umeda
Matt Richards
Richard Corbi
Sarah Jensen

Encl: Form 500-N
Attachment A – Additional Form 500-N Descriptions
Attachment B – Calculated Excess Emissions
Attachment C – NO_x Concentration Graph
Attachment D – Alarm Sequence Report
Attachment E – Compliance Demonstration

South Coast Air Quality Management District

Form 500-N

Title V - Deviations, Emergencies & Breakdowns

*This written report is in addition to requirements to verbally report certain types of incidents. Verbal reports may be made by calling AQMD at 1-800-288-7664 (1-800-CUT-SMOG) or AQMD enforcement personnel.

Mail To:
SCAQMD- Compliance & Enforcement
P.O. Box 4941
Diamond Bar, CA 91765-0941

Tel: (909) 396-3385
www.aqmd.gov

Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit): Vernon Public Utilities

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 195802

3. Address: (where incident occurred) 4963 S Soto Street (Street Address)
Vernon (City) CA (State) 90058 (Zip)

4. Mailing Address: (if different from Item 3) 4305 Santa Fe Avenue (Street Address)
Vernon (City) CA (State) 90058 (Zip)

5. Provide the name, title, and phone number of the person to contact for further information:

Matt Richards (Name) | Utilities Operations Manager (Title) | (626) 393-3748 (Phone #)

Section II - Reporting of Breakdowns, Deviations, and Emergencies

1. This written notification is to report a(n):

Type of Incident	Verbal Report Due*	Written Report Due
a. [X] Emergency under Rule 3002(g)	Within 1 hour of discovery	Within 2 working days from when the emission limit was exceeded.
b. [ ] Breakdown under: [ ] Rule 430 (Non-RECLAIM) [ ] Rule 2004 (RECLAIM) [ ] Rule 218 (Non-RECLAIM) [See Rule 218(f)(3)]	For Rules 430 & 2004 - Within 1 hour of discovery. For Rule 218 – Within 24 hours or next business day for failure/shutdown exceeding 24 hours	For Rules 430 & 2004 - Within 7 calendar days after breakdown is corrected, but no later than 30 days from start of the breakdown, unless a written extension is granted. For Rule 218 - With required semi-annual reports.
c. [ ] Deviation with excess emissions [See Title V Permit, Section K, Condition No. 22B]	Within 72 hours of discovery of the deviation or shorter reporting period if required by an applicable State or Federal Regulation.	Within 14 days of discovery of the deviation.
d. [ ] Other Deviation [See Title V Permit, Section K, Condition Nos. 22D & 23]	None	With required semi-annual monitoring reports.

2. The incident was first discovered by: Juan Avalos (Name) on 11/18/2024 (Date) 08:42 (Time) (•) AM ( ) PM

3. The incident was first reported by: Automated Message Service (Name of AQMD Staff Person) on 11/18/2024 (Date) 10:59 (Time) (•) AM ( ) PM

a. (•) Via Phone

b. ( ) In Person

Notification Number (Required): 818226

4. When did the incident actually occur? 11/18/2024 (Date) 08:40 (Time) (•) AM ( ) PM

AQMD USE ONLY				
Received By:		Assigned By:	Inspector:	
Date/Time Received:		Date/Time Assigned:	Date/Time Received Assignment:	
Date Delivered To Team:		Date Reviewed Inspector Report:	Date Inspected Facility:	
Team:	Sector:	Breakdown/Deviation Notification No.	Date Completed Report:	
Recommended Action:	Cancel Notification	Grant Relief	Issue NOV No.	Other:
Final Action:	Cancel Notification	Grant Relief	Issue NOV No.	Other:

5. Has the incident stopped? a. (•) Yes, on: 11/18/2024 (Date) 08:44 (Time) (•) AM ( ) PM b. ( ) No

6. What was the total duration of the incident? 0 (Days) 01 (Hours)

7. For equipment with an operating cycle, as defined in Rule 430 (b)(3)(A), when was the end of the operating cycle during which the incident occurred? _____ (Date) _____ (Time) ( ) AM ( ) PM

8. Describe the incident and identify each piece of equipment (by permit, application, or device number) affected. Attach photos (when available) of the affected equipment and attach additional pages as necessary.

See Attachment A.

9. The incident may have resulted in a:

a. [X] Violation of Permit Condition(s): Section D, Condition No. A195.5 2.0 ppmv NOx emission limit averaged over 1 hour

b. [ ] Violation of AQMD Rule(s): _____

10. What was the probable cause of the incident? Attach additional pages as necessary.

A grid disturbance outside of the facility's control. See Attachment A.

11. Did the incident result in excess emissions? ( ) No (•) Yes (Complete the following and attach calculations.)

[ ] VOC _____ lbs [X] NOx 0.31 lbs [ ] SOx _____ lbs [ ] H2S _____ lbs

[ ] CO _____ lbs [ ] PM _____ lbs [ ] Other: _____ lbs See Attachment B pollutant

12. *For RECLAIM facilities Subject to Rule 2004 (i)(3) ONLY:* If excess emissions of NOx and/or SOx were reported in Item 11, do you want these emissions to be counted when determining compliance with your annual allocations?

a. (•) Yes, for: [X] NOx [ ] SOx b. ( ) No, for: [ ] NOx [ ] SOx

If box 12(b) above is checked, include all information specified in Rule 2004(i)(3)(B) and (C), as applicable.

13. Describe the steps taken to correct the problem (i.e., steps taken to mitigate excess emissions, equipment repairs, etc.) and the preventative measures employed to avoid future incidents. Include photos of the failed equipment if available and attach additional pages as necessary.

See Attachment A.

14. Was the facility operating properly prior to the incident?

a. (•) Yes b. ( ) No, because: _____

15. Did the incident result from operator error, neglect or improper operation or maintenance procedures?

a. ( ) Yes b. (•) No, because: cause was a grid disturbance outside of the facility's control.

16. Has the facility returned to compliance?

a. ( ) No, because: _____

b. (•) Yes (Attach evidence such as emissions calculations, contemporaneous operating logs or other credible evidence.)

Section III - Certification Statement

I certify under penalty of law that based on information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

For Title V Facilities ONLY: [X] I also certify under penalty of law that that I am the responsible official for this facility as defined in AQMD Regulation XXX.

1. Signature of Responsible Official:	2. Title of Responsible Official:
	General Manager of Vernon Public Utilities
3. Print Name: Todd Dusenberry	4. Date: 11-20-24
5. Phone #: (323) 583-8811	6. Fax #:

7. Address of Responsible Official:

4305 Santa Fe Avenue	Vernon	CA	90058
Street #	City	State	Zip

Attachment A: Additional Form 500-N Descriptions

This attachment presents additional information regarding the excess emissions event which occurred on November 18, 2024, as prompted by Form 500-N.

8. Describe the incident and identify each piece of equipment (by permit, application, or device number) affected. Attach photos (when available) of the affected equipment and attach additional pages as necessary.

The facility experienced a grid disturbance on November 18, 2024 at 8:40 am. This is considered an emergency outside of the facility's control. The grid disturbance caused the pilot gas control valve position to open from about 30% to 100% for less than one minute. More fuel was injected and it caused an emissions exceedance of NO_X for Gas Turbine No. 2 (Device ID D36) for the 8:00 am hour (2.3 ppmvdc exceeded the 2.0 ppmvdc limit). Following the Unit 2 NO_X emissions exceedance, Jacobs on behalf of the site made the required verbal notification to the South Coast Air Quality Management District (SCAQMD) at 1-800-288-7664 at 10:59 am. The notification confirmation number and operator number were not provided as a recording service is used on Mondays.

11. Did the incident result in excess emissions?

Yes. See Attachment B for calculated excess emissions of 0.31 pounds of NOx.

13. Describe the steps taken to correct the problem (i.e., steps taken to mitigate excess emissions, equipment repairs, etc.) and the preventative measures employed to avoid future incidents. Include photos of the failed equipment if available and attach additional pages as necessary.

Site personnel worked immediately after discovery, which was within two minutes following the grid disturbance, to manually drive the NO_X emissions down as low as possible. However, due to the very high spike following the grid disturbance, the Unit 2 NO_X hourly emissions were still greater than the permit limit for the 8:00 am hour. Following this hour (9:00 am and onwards), Unit 2 NO_X emissions returned to normal.

Attachment C contains a graph of the 4-minute NOx concentration spike followed by low concentrations.

Attachment D contains the alarm sequence report demonstrating when the emergency grid disturbance began at 08:40:40 AM and the site personnel's manual control to lower NOx during the hour.

16. Has the facility returned to compliance?

As documented in Form 500-N, the facility has returned to compliance. Demonstration of this return to compliance is provided in Attachment E in the form of hourly NOx ppmvdc emission values before and after the event on November 18, 2024.

Attachment B: Calculated Excess Emissions

Calculated Excess Emissions Due to Emergency During 8:00 AM Hour on November 18, 2024

Emissions and NOx Concentration:

	Actual emissions	Emissions if 2.0 ppmvdc limit was met	Excess Emissions
U2_NOxTotalRECLM_LbPerHr_1H	2.56	2.25	0.31
U2_NOxNormal_Ppmvdc_1H	2.3	2.00	

Actual emissions for 8:00 AM hour on November 18, 2024:

U2_NOxTotalRECLM_LbPerHr_1H

	U2_NOx_Ppmvdc_15M	U2_NOxRECLM_Ppm_15M	U2_StackFlowRECLM_scfh_15M	U2_NOxRECLM_LbPerHr_15M	U2_O2Dry_Pct_15M
11/18/2024 8:00	1.8	1.9	8858000	2.01	14.6
11/18/2024 8:15	1.8	1.9	8838000	2.01	14.6
11/18/2024 8:30	4.5	4.8	8840000	5.07	14.6
11/18/2024 8:45	1	1.1	8858000	1.16	14.6
Average for 1 Hour:	2.3	2.4	8848500	2.56	14.6

Emissions if 2.0 ppmvdc hourly limit was met:

	U2_NOx_Ppmvdc_15M	U2_NOxRECLM_Ppm_15M	U2_StackFlowRECLM_scfh_15M	U2_NOxRECLM_LbPerHr_15M	U2_O2Dry_Pct_15M
11/18/2024 8:00	1.8	1.9	8858000	2.01	14.6
11/18/2024 8:15	1.8	1.9	8838000	2.01	14.6
11/18/2024 8:30	3.4	3.6	8840000	3.84	14.6
11/18/2024 8:45	1.0	1.1	8858000	1.16	14.6
Average for 1 Hour:	2.00	2.1	8848500	2.25	14.6

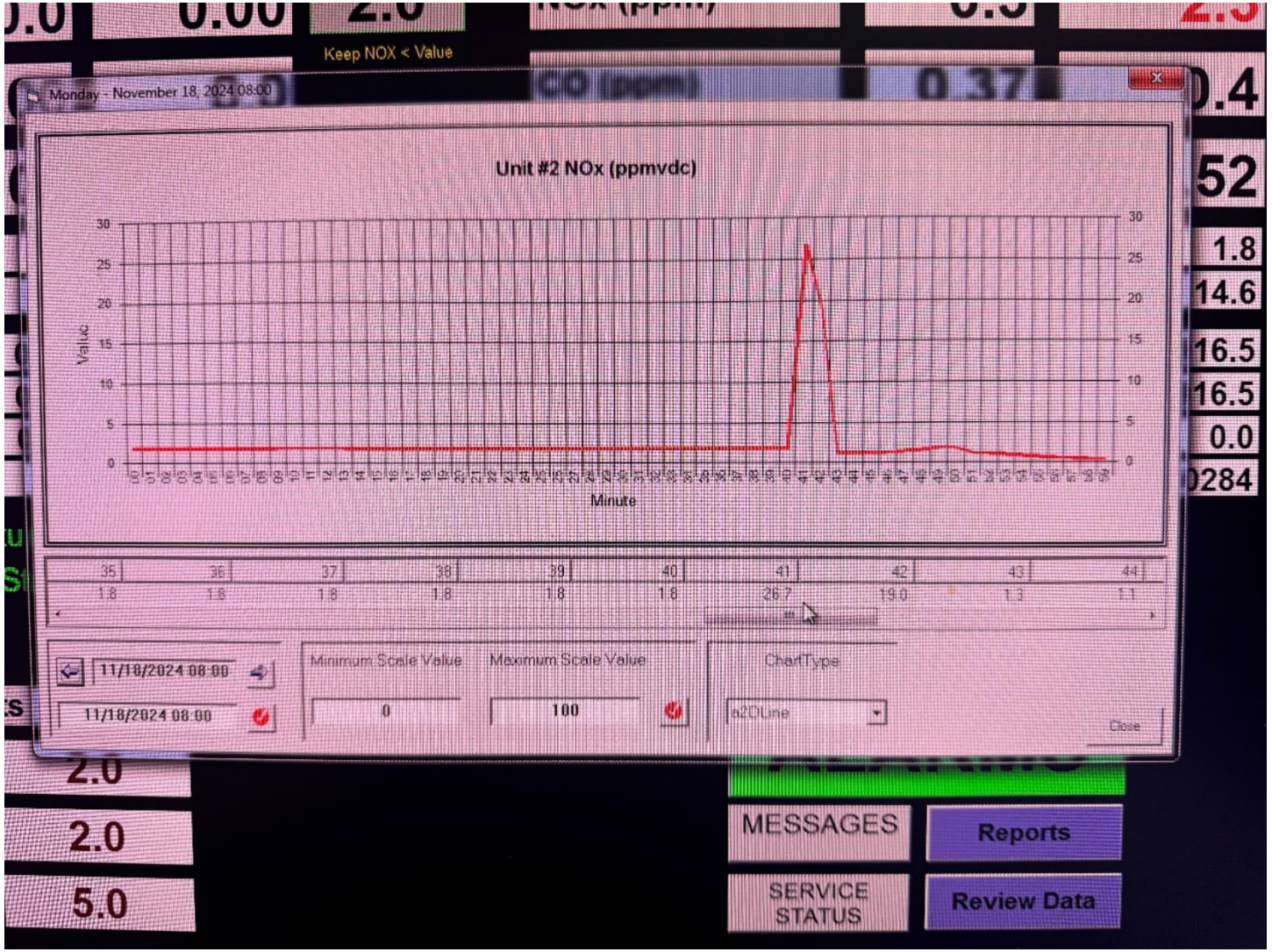
Constants:

Conversion	1.195
Conversion	0.0000001
U2_NOxBias_LbPerHr	1
U2_NOxBias_ppm	1
U2_O2_Correction_Pct	15

Malburg Generating Station, Facility ID 195802
Gas Turbine No. 2
Date of Data: November 19, 2024

Attachment C: NOx Concentration Graph

Gas Turbine No. 2 (Device ID D36): Elevated NO_X ppmvdc from 08:40 to 08:43 AM



Attachment D: Alarm Sequence Report

SPPA-T3000

Alarm Sequence Report

ame:

omment:

eated at: 11/19/2024 14:50:20.501

me: From 11/18/2024 08:38:00.000 To 11/18/2024 09:02:00.000

gs: all entries

ointGroups:

arm Types: all entries

iorities: >= 0

alues: all entries

itial Values: not included

e: not included

Time	Type	Prio	Name	Designation	Value	Note
11/18/2024 08:38:03.133	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:38:03.133	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:38:03.133	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:38:03.133	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:38:03.133	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:38:03.133	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:38:03.133	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:38:04.133	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:38:04.133	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:38:04.133	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:38:04.133	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:38:04.133	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	

Alarm Sequence Report

ame:

reated at: **11/19/2024 14:50:20.501**

me: **From** **11/18/2024 08:38:00.000** **To** **11/18/2024 09:02:00.000**

Time	Type	Prio	Name	Designation	Value	Note
11/18/2024 08:38:04.133	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:38:04.133	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:05.133	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:39:05.133	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:05.133	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:39:05.133	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:39:05.133	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:05.133	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:39:05.133	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:06.233	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:39:06.233	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:06.233	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:39:06.233	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:39:06.233	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:06.233	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:39:06.233	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:36.133	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:39:36.133	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:36.133	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:39:36.133	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:39:36.133	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:36.133	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:39:36.133	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:37.233	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:39:37.233	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:37.233	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:39:37.233	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:39:37.233	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:39:37.233	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:39:37.233	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:40:39.946	S	2	3MAY31DE905||ZV11	Min Output Limiter	Active	

Alarm Sequence Report

ame:

reated at: 11/19/2024 14:50:20.501

me: From 11/18/2024 08:38:00.000 To 11/18/2024 09:02:00.000

Time	Type	Prio	Name	Designation	Value	Note
11/18/2024 08:40:39.969	S	2	3MAY31DP901||ZV11	HP Admission Pressure Controller	[Active]	
11/18/2024 08:40:40.006	S	2	3MAY31DE905||ZV11	Min Output Limiter	[Active]	
11/18/2024 08:40:40.009	S	2	3MAY31DP901||ZV11	HP Admission Pressure Controller	Active	
11/18/2024 08:40:40.506	W	5	2CJP10DS902||LLD2_Active	Load Loss Detected	1	
11/18/2024 08:40:40.526	S	2	3MAY31DE905||ZV11	Min Output Limiter	Active	
11/18/2024 08:40:40.529	S	2	3MAY31DP901||ZV11	HP Admission Pressure Controller	[Active]	
11/18/2024 08:40:40.686	S	2	3MAY31DE905||ZV11	Min Output Limiter	[Active]	
11/18/2024 08:40:40.689	S	2	3MAY31DP901||ZV11	HP Admission Pressure Controller	Active	
11/18/2024 08:40:40.700	S	0	01_YS_WMG_CHE10EE001XP12||XG51	STGEN WARMING UP STATUS	WARMING UP	
11/18/2024 08:40:40.709	S	2	2MBP20AA005||XG03	Pilot Gas Control Valve Start Pos	0	
11/18/2024 08:40:40.786	W	5	2MBP20AA005||XH03	Pilot Gas Control Valve Position	> high	
11/18/2024 08:40:40.800	S	0	01_YS_WMG_CHE10EE001XP12||XG51	STGEN WARMING UP STATUS	[WARMING	
11/18/2024 08:40:42.432	A	0	21_BMS2_B3:1||8	MFTFO - HWT RELAY TRIPPED	ACTIVE	
11/18/2024 08:40:42.432	A	0	21_BMS2_MFT||OUT	MFTFO MASTER FUEL TRIP	ACTIVE	
11/18/2024 08:40:50.506	W	5	2CJP10DS902||LLD2_Active	Load Loss Detected	0	
11/18/2024 08:40:54.760	I&C	0	21-PL-5000B1008||XM03	ET200M station #5	TROUBLE	
11/18/2024 08:40:54.760	I&C	0	21_FIC_LAE50CF001||XM33	HP DESHTR SPR WTR FLW	BAQ QL	
11/18/2024 08:40:54.867	I&C	0	21_FIT_LAE50CF001_CMP||XM36	21 HP DSHTR SPRWTR FLW COMP	TRBL	
11/18/2024 08:40:54.867	I&C	2	21_FIT_LAE50CF001_CMP||XM33	21 HP DSHTR SPRWTR FLW COMP	BAQ QL	
11/18/2024 08:41:02.207	W	5	2MBP20AA005||XH03	Pilot Gas Control Valve Position	[> high]	
11/18/2024 08:41:09.533	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:41:09.533	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:41:09.533	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:41:09.533	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:41:09.533	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:41:09.533	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:41:09.533	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:41:10.633	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:41:10.633	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:41:10.633	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:41:10.633	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	

Alarm Sequence Report

ame:

reated at: 11/19/2024 14:50:20.501

me: From 11/18/2024 08:38:00.000 To 11/18/2024 09:02:00.000

Time	Type	Prio	Name	Designation	Value	Note
11/18/2024 08:41:10.633	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:41:10.633	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:41:10.633	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:41:12.551	S	2	2MBP20AA005||XG03	Pilot Gas Control Valve Start Pos	1	
11/18/2024 08:41:20.660	A	0	21_AT_3705||Q1	HRSG 2 INLET NOx HIGH	> 20.0 PPM	
11/18/2024 08:41:25.461	A	0	21_AT_3702||Q	HRSG2 STK NOX >2.4 PPM	1	
11/18/2024 08:41:33.760	I&C	0	21-PL-5000B1008||XM03	ET200M station #5	[TROUBLE]	
11/18/2024 08:41:33.760	I&C	0	21_FIC_LAE50CF001||XM33	HP DESHTR SPR WTR FLW	[BAQ QL]	
11/18/2024 08:41:33.868	I&C	0	21_FIT_LAE50CF001_CMP||XM36	21 HP DSHTR SPRWTR FLW COMP	[TRBL]	
11/18/2024 08:41:33.868	I&C	2	21_FIT_LAE50CF001_CMP||XM33	21 HP DSHTR SPRWTR FLW COMP	[BAQ QL]	
11/18/2024 08:41:45.960	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	MAN mode	
11/18/2024 08:41:54.460	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	[MAN mode]	
11/18/2024 08:42:10.861	A	0	21_AT_3705||Q1	HRSG 2 INLET NOx HIGH	[> 20.0 PPM]	
11/18/2024 08:42:12.561	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	MAN mode	
11/18/2024 08:42:59.262	A	0	21_AT_3702||Q	HRSG2 STK NOX >2.4 PPM	0	
11/18/2024 08:43:11.562	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	[MAN mode]	
11/18/2024 08:45:49.133	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:45:49.133	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:45:49.133	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:45:49.133	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:45:49.133	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:45:49.133	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:45:49.133	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:45:50.233	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:45:50.233	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:45:50.233	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:45:50.233	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:45:50.233	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:45:50.233	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:45:50.233	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:46:00.044	A	0	21_BMS2_B3:1||8	MFTFO - HWT RELAY TRIPPED	[ACTIVE]	

Alarm Sequence Report

ame:

reated at: 11/19/2024 14:50:20.501

me: From 11/18/2024 08:38:00.000 To 11/18/2024 09:02:00.000

Time	Type	Prio	Name	Designation	Value	Note
11/18/2024 08:46:00.044	A	0	21_BMS2_MFT||OUT	MFTFO MASTER FUEL TRIP	[ACTIVE]	
11/18/2024 08:48:10.270	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	MAN mode	
11/18/2024 08:48:14.470	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	[MAN mode]	
11/18/2024 08:48:37.270	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	MAN mode	
11/18/2024 08:48:56.233	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:48:56.233	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:48:56.233	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:48:56.233	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:48:56.233	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:48:56.233	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:48:56.233	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:48:57.634	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:48:57.634	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:48:57.634	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:48:57.634	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:48:57.634	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:48:57.634	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:48:57.634	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:51:00.133	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:51:00.133	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:51:00.133	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:51:00.133	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:51:00.133	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:51:00.133	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:51:00.133	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:51:01.533	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:51:01.533	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:51:01.533	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:51:01.533	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:51:01.533	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:51:01.533	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	

Alarm Sequence Report

ame:

reated at: **11/19/2024 14:50:20.501**

me: **From** **11/18/2024 08:38:00.000** **To** **11/18/2024 09:02:00.000**

Time	Type	Prio	Name	Designation	Value	Note
11/18/2024 08:51:01.533	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:58:15.533	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:58:15.533	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:58:15.533	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:58:15.533	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:58:15.533	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:58:15.533	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:58:15.533	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:58:16.933	A	0	2032.351A_21_4100.IN102||XG01	CTG2 Strt Mtr Xfmr Rly-63PR	[ACTIVE]	
11/18/2024 08:58:16.933	A	0	2032.351A_21_4100.IN103||XG01	CTG2 Strt Mtr Xfmr Rly-26Q2	[ACTIVE]	
11/18/2024 08:58:16.933	A	0	2032.351A_21_4100.IN104||XG01	CTG2 Strt Mtr Xfmr Rly-49T3	[ACTIVE]	
11/18/2024 08:58:16.933	A	0	2032.351A_4100B.IN102||XG01	Mn Stn Xfmr B Rly-63PR	[ACTIVE]	
11/18/2024 08:58:16.933	A	0	2032.351A_4100B.IN103||XG01	Mn Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 08:58:16.933	A	0	2032.351A_4200B.IN102||XG01	Aux Stn Xfmr B R -63PR- Pressure Relief	[ACTIVE]	
11/18/2024 08:58:16.933	A	0	2032.351A_4200B.IN103||XG01	Aux Stn Xfmr B Rly-26Q2	[ACTIVE]	
11/18/2024 09:01:06.691	A	0	21_YS_ALM_3708||XG01	HRSG 2 EXH STK EMSNS HI	HI	
11/18/2024 09:01:20.591	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	[MAN mode]	
11/18/2024 09:01:23.990	M	0	21_FIC_HSJ50CF010||XC12	21 SCR NH3 FCV IN MANUAL	MAN mode	

Attachment E: Compliance Demonstration

NOx CO VOC NH3_Daily Summary Report

Units 1 and 2 - NOx CO VOC NH3

From: 11/18/2024 00:00 **To:** 11/18/2024 23:00 **Facility Name:** Malburg Generating Station

Generated: 11/19/2024 11:58 **Location:** Vernon, California

Red = Invalid or Excluded Data | Green = Edited Status | Blue = Edited Value | * = Excess Emission

C = Calibration Occurred | M = Missing Data | OS = Out Of Service | OC = Out Of Control | SI = Sample is Invalid (other than M, OS, OC) | >S = Exceeds Scale

Const. Value/Limit Tag:	> 2	> 2	> 2	> 5.49	> 2	> 2	> 2	> 5.49
	Unit 1	Unit 1	Unit 1	Unit 1	Unit 2	Unit 2	Unit 2	Unit 2
	NOx, Normal, Ppmvdc	CO, Normal, Ppmvdc	VOC, Normal, Ppmvdc	NH3Slip, Normal, Ppmvdc	NOx, Normal, Ppmvdc	CO, Normal, Ppmvdc	VOC, Normal, Ppmvdc	NH3Slip, Normal, Ppmvdc
	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)
11/18/2024 00:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.9
11/18/2024 01:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.9
11/18/2024 02:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.9
11/18/2024 03:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.3
11/18/2024 04:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.5	1	1.8
11/18/2024 05:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.5	1	1.8
11/18/2024 06:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.5	1	1.7
11/18/2024 07:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.5	1	1.9
11/18/2024 08:00	0.0 SI	0.0 SI	0 SI	0.0 SI	2.3 *	0.4	0	3.5
11/18/2024 09:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.4	0.4	0	-0.2 >S
11/18/2024 10:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	-0.3 >S
11/18/2024 11:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.9
11/18/2024 12:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.9
11/18/2024 13:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.9
11/18/2024 14:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.0 >S
11/18/2024 15:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.7
11/18/2024 16:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	0.3 >S
11/18/2024 17:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	-0.4 >S
11/18/2024 18:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.3 >S
11/18/2024 19:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.2 >S
11/18/2024 20:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.5	1	1.4
11/18/2024 21:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.4	0	1.3
11/18/2024 22:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.5	1	1.8
11/18/2024 23:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.5	1	1.8
Average/Sum#:	0.0	0.0	0	0.0	1.8	0.4	0	1.4
Minimum:	0.0	0.0	0	0.0	1.4	0.4	0	-0.4
Maximum:	0.0	0.0	0	0.0	2.3	0.5	1	3.5
%SI	100.00	100.00	100.00	100.00	0.00	0.00	0.00	0.00

Daily RECLAIM NOx Summary Report

From: 11/18/2024 00:00 **To:** 11/18/2024 23:59 **Facility Name:** Malburg Generating Station
Generated: 11/19/2024 11:59 **Location:** Vernon, California

Red = Invalid or Excluded Data | Green = Edited Status | Blue = Edited Value | * = Excess Emission

	Unit 1 NOXTotal, RECLM, LbPerHr 1 Hour(s)	Unit 1 DBNOXTotal, RECLM, LbPerHr 1 Hour(s)	Unit 2 NOXTotal, RECLM, LbPerHr 1 Hour(s)	Unit 2 DBNOXTotal, RECLM, LbPerHr 1 Hour(s)
11/18/2024 00:00	0.00	0.00	2.01	0.00
11/18/2024 01:00	0.00	0.00	2.01	0.00
11/18/2024 02:00	0.00	0.00	2.01	0.00
11/18/2024 03:00	0.00	0.00	2.22	0.00
11/18/2024 04:00	0.00	0.00	2.12	0.00
11/18/2024 05:00	0.00	0.00	2.19	0.00
11/18/2024 06:00	0.00	0.00	2.35	0.00
11/18/2024 07:00	0.00	0.00	2.02	0.00
11/18/2024 08:00	0.00	0.00	2.56	0.00
11/18/2024 09:00	0.00	0.00	1.91	0.00
11/18/2024 10:00	0.00	0.00	3.01	0.00
11/18/2024 11:00	0.00	0.00	2.00	0.00
11/18/2024 12:00	0.00	0.00	2.00	0.00
11/18/2024 13:00	0.00	0.00	2.00	0.00
11/18/2024 14:00	0.00	0.00	2.27	0.00
11/18/2024 15:00	0.00	0.00	2.00	0.00
11/18/2024 16:00	0.00	0.00	2.83	0.00
11/18/2024 17:00	0.00	0.00	3.62	0.00
11/18/2024 18:00	0.00	0.00	2.28	0.00
11/18/2024 19:00	0.00	0.00	2.45	0.00
11/18/2024 20:00	0.00	0.00	2.32	0.00
11/18/2024 21:00	0.00	0.00	2.38	0.00
11/18/2024 22:00	0.00	0.00	2.12	0.00
11/18/2024 23:00	0.00	0.00	2.01	0.00
Average/Sum#:	0.00 #	0.00 #	54.69 #	0.00 #
Minimum:	0.00	0.00	1.91	0.00
Maximum:	0.00	0.00	3.62	0.00
%SI	0.00	0.00	0.00	0.00

Appendix G
MGS RECLAIM Annual Emission Allocation Information

South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

FACILITY PERMIT TO OPERATE
VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

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

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

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

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin (month/year)	Year End	Zone	NOx RTC Initially Allocated	NOx RTC[1] Holding as of 07/01/2024 (pounds)	Non-Tradable[2] Non-Usable RTCs (pounds)
7/2021	6/2022	Coastal	28480	6430	0
1/2022	12/2022	Coastal	0	13151	0
7/2022	6/2023	Coastal	28480	7859	0
1/2023	12/2023	Coastal	0	25413	0
7/2023	6/2024	Coastal	28480	17413	0
1/2023	12/2023	Inland	0	10367	0
1/2024	12/2024	Coastal	0	35596	0
7/2024	6/2025	Coastal	28480	17597	0
1/2025	12/2025	Coastal	0	15663	0
7/2025	6/2026	Coastal	28480	15663	0
1/2026	12/2026	Coastal	0	15663	0
7/2026	6/2027	Coastal	28480	15663	0
1/2027	12/2027	Coastal	0	15663	0
7/2027	6/2028	Coastal	28480	15663	0
1/2028	12/2028	Coastal	0	15663	0
7/2028	6/2029	Coastal	28480	15663	0
1/2029	12/2029	Coastal	0	15663	0

Footnotes:

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

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

FACILITY PERMIT TO OPERATE
VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

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

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

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

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin (month/year)	Year End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC[1] Holding as of 07/01/2024 (pounds)	Non-Tradable[2] Non-Usable RTCs (pounds)
7/2029	6/2030	Coastal	28480	15663	0
1/2030	12/2030	Coastal	0	15663	0
7/2030	6/2031	Coastal	28480	15663	0
1/2031	12/2031	Coastal	0	15663	0
7/2031	6/2032	Coastal	28480	15663	0
1/2032	12/2032	Coastal	0	15663	0
7/2032	6/2033	Coastal	28480	15663	0
1/2033	12/2033	Coastal	0	15663	0
7/2033	6/2034	Coastal	28480	15663	0
1/2034	12/2034	Coastal	0	15663	0
7/2034	6/2035	Coastal	28480	15663	0
1/2035	12/2035	Coastal	0	15663	0
7/2035	6/2036	Coastal	28480	15663	0
1/2036	12/2036	Coastal	0	15663	0
7/2036	6/2037	Coastal	28480	15663	0
1/2037	12/2037	Coastal	0	15663	0
7/2037	6/2038	Coastal	28480	15663	0

Footnotes:

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

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

FACILITY PERMIT TO OPERATE
VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

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

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

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

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin (month/year)	Year End	Zone	NOx RTC Initially Allocated	NOx RTC[1] Holding as of 07/01/2024 (pounds)	Non-Tradable[2] Non-Usable RTCs (pounds)
1/2038	12/2038	Coastal	0	15663	0
7/2038	6/2039	Coastal	28480	15663	0
1/2039	12/2039	Coastal	0	15663	0

Footnotes:

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

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

FACILITY PERMIT TO OPERATE
VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

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

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