DOCKETED	
Docket Number:	92-SPPE-01
Project Title:	Small Power Plant Exemption for the Carson-Ice Generation Project
TN #:	261612
Document Title:	Carson 2024 CEC Annual Compliance Report
Description:	2024 Annual Compliance Report for Carson Power Plant
Filer:	Jeremy Klosinski
Organization:	EthosEnergy
Submitter Role:	Applicant
Submission Date:	2/7/2025 3:03:05 PM
Docketed Date:	2/7/2025



January 27, 2025

Ms. Ashley Gutierrez California Energy Commission 715 P Street, MS-2000 Sacramento, CA 95814

RE: Carson Power Plant SPPE Docket # 92-SPPE-1

Ms. Gutierrez;

Attached is the 2024 Annual Update report for above referenced project. This update includes the following items:

- Qtr 4 2024 Carson Power Plant Emissions Reports
- 2024 Project Status Update
- Updated Carson Power Plant Compliance Matrix
- Copy of the letter showing status of the Bio-9 mitigation payments

Specific Condition of Exemption are listed in the Project Status Report

If you have any questions regarding these reports, I can be reached at 916-429-4345.

Sincerely,

Jose Garcia

Facility Manager

Carson Power Plant

# Carson Power Plant

# California Energy Commission Docket # 92-SPPE-1

Annual Compliance Report For Calendar Year 2024

Distribution:

Ashley Gutierrez Pedro Juarez Laurie Johnson California Energy Commission Carson Power Plant Carson Power Plant

# Carson Power Plant

### **Project Status during 2024**

The facility continues to operate daily from the dispatch schedule prepared by SMUD Power Systems Operation (PSO). The schedule dispatches the facility in order to meet SMUD's daily system load as predicted by PSO. The facility may operate on Automatic Governor Control in the load range of 55 - 100 mW or facility operators can manually control the facility output at a preset load.

Scheduled annual outages were taken on both the Combined Cycle and Peaking units in March of 2023 to perform required boiler inspections and annual maintenance. Authorized inspectors representing our Boiler and Machinery insurance carrier and our water treatment vendor were present for the inspection. The cooling tower basin was cleaned of residual dirt. Typical annual inspections of the gas turbines, condenser, and cooling tower were done. All electrical protection devices were calibrated and recertified.

In March 2024, the project submitted 2024 data for both the State and Federal GHG programs. Third party verifiers delivered a positive opinion following a site data audit in June 2024.

In mid Oct 2023 the steam turbine at the site suffered a blade failure. This failure drove an extended forced outage on the Combined Cycle plant until June of 2024. Repairs were completed and the Combined Cycle plant was returned to service in June of 2024. The Peaking Turbine was in service throughout this period.

In February 2024, the project replaced the O<sub>2</sub> CEMS analyzer serving the Peaking Turbine due to obsolescence. The O<sub>2</sub> CEMS analyzer serving the Combined Cycle unit is scheduled to be replaced in February 2024.

Carson Power Plant continues dumping plant wastewaters to the sanitary sewer.

### **Annual Reporting Requirements**

AQ-1	Data submitted Quarterly, copy of Qtr 4 reports included.
AQ-2	No Emissions exceedances were recorded for the reporting period.
AQ-4	No road maintenance work completed in 2024. No road maintenance anticipated for 2025.
BIO-9	Annual payment was made to TNC by in May of 2024. Payment is current

at the time of this report. Evidence for the May 2024 payment is attached.

### **Attachments:**

Copy of Compliance Matrix Copy of Qtr 4 2024 SMAQMD Emissions Reports Copy of 2024 TNC Proof of Payment



January 8, 2025

Chris Loscher Sacramento Metropolitan Air Quality Management District 777 12<sup>th</sup> Street, 3<sup>rd</sup> Floor. Sacramento, CA 95814-1908

Dear Mr. Loscher,

Enclosed is the Carson Power Plant / SRWTP Quarterly Emissions Report for the 4<sup>th</sup> Quarter of 2024. If you have any questions regarding this data, please direct them to Jose A. Garcia at 916-429-4345.

Sincerely,

Jose A. Garcia

Facility Manager

cc: Pedro Juarez Carson Power Plant

Justin Kwok SRWTP Anna Johnson SRWTP

Director Air Division US EPA Region IX

### Attachments:

- 1. Annual Emissions Summary Worksheet
- 2. Carson Power Plant / SRWTP Quarterly Emissions Report
- 3. Carson Power Plant / SRWTP Quarterly Excess Emissions Report & Exceedance Details
- 4. Excess Emissions Report & Monitoring System Performance HRSG NOx
- 5. Excess Emissions Report & Monitoring System Performance HRSG CO
- 6. Carson Power Plant 3 hr Average Exceedance Report & Exceedance Details HRSG Stack
- 7. Excess Emissions Report & Monitoring System Performance Peaker NOx
- 8. Excess Emissions Report & Monitoring System Performance Peaker CO
- 9. Carson Power Plant 3 hr Average Exceedance Report & Exceedance Details Peaker Stack
- 10. Carson Power Plant Emergency Generator Emissions Report
- 11. Excess Emissions Report & Monitoring System Performance Auxiliary Boiler NOx
- 12. Excess Emissions Report & Monitoring System Performance Auxiliary Boiler CO
- 13. Aux Boiler Quarterly Mass Report
- 14. Aux Boiler Daily Mass Report
- 15. Cooling Tower Emissions Summary
- 16. Acid Rain Program Electronic Data Reporting Certification Letter
- 17. Continuous Emissions Monitoring System Log
- 18. Auxiliary Boiler Continuous Emissions Monitoring System Log
- 19. Diesel Annual Engine Survey (4<sup>th</sup> Quarter Only)

# Carson Power Plant Emissions Totals Summary

# **Quarter 4 2024**

Quarterly Emissions Summary	All	All Limits and Reported Quanities are in Lbs.					
	CO	NOX	SOX	ROC	PM10		
Carson Power Plant / SRWTP	9832	5031	1204	2645	2006		
Quarterly Limits	75261	19678	5849	9172	9545		
Annual Emissions Summary							
	CO	NOX	SOX	ROC	PM10	Diesel Hrs	
First Quarter	77	3431	1932	1068	868	7.7	
Second Quarter	4849	4946	1098	2495	1476	8.0	
Third Quarter	16892	5104	768	3005	2454	1.0	
Fourth Quarter	9832	5031	1204	2645	2006	3.3	
Annual Totals w/o Diesel	31650	18512	5002	9213	6804		
Annual Limits w/o Diesel	198000	78128	23205	36406	37887		
Emergency Diesel Emissions(ytd)	195	384	0	18	12	20.0	
Annual Totals w/Diesel	31845	18896	5002	9231	6816	20.0	
Annual Limits w/Diesel	200000	80151	23261	36582	38003	100	
Breakdown Summary:							
Date Unit	Description						

1/14/2025 10:07

# CARSON POWER PLANT / SRWTP EMISSIONS REPORT

					(lbs	s)						
CO Actual Limit					S( Actual	Ox Limit		RO Actual	OC Limit		PM Actual	10 Limit
9745		2190	10940		173			1570			1280	
88		174			7			61			50	
											69	
9832	49907	2364			180	5849		1631	9172		1399	
		2667			1024			1014			607	
9832	75261	5031	19678		1204			2645			2006	9545
0.1	23404	32.8	905		10.8	71		80.3	448		104.6	590
	9745 88 9832 9832	Actual       Limit         9745          88           9832       49907          9832       75261	Actual         Limit         Actual           9745          2190           88          174                9832         49907         2364            2667           9832         75261         5031	Actual         Limit         Actual         Limit           9745          2190         10940           88          174            9832         49907         2364            9832         75261         5031         19678	Actual         Limit         Actual         Limit           9745          2190         10940           88          174            9832         49907         2364            9832         75261         5031         19678	CO Actual Limit         NOx Actual Limit         SO Actual           9745          2190 10940         173           88          7              180           9832         49907         2364          1024           9832         75261         5031         19678         1204	Actual         Limit         Actual         Limit         Actual         Limit           9745          2190         10940         173            88          174          7                   9832         49907         2364          180         5849            2667          1024            9832         75261         5031         19678         1204	CO Actual Limit         NOx Actual Limit         SOx Actual Limit           9745          2190 10940         173           88          174         7              180 5849           9832         49907         2364         1024           9832         75261         5031 19678         1204	CO Actual Limit         NOx Actual Limit         SOx Actual Limit         ROActual Limit           9745          2190         10940         173          1570           88          174          7          61              180         5849         1631           9832         49907         2364          1024          1014           9832         75261         5031         19678         1204         2645	CO Actual Limit         NOx Actual Limit         SOx Actual Limit         ROC Actual Limit           9745          2190         10940         173          1570            88          174          7          61            9832         49907         2364          180         5849         1631         9172             2667          1024          1014            9832         75261         5031         19678         1204         2645	CO Actual Limit         NOx Actual Limit         SOx Actual Limit         ROC Actual Limit           9745          2190 10940         173         1570           88          174         7         61              180 5849         1631 9172           9832         49907         2364         1024         1014           9832         75261         5031 19678         1204         2645	CO Actual Limit         NOx Actual Limit         SOx Actual Limit         ROC Actual Limit         PM Actual Limit           9745          2190         10940         173          1570          1280           88          174          7          61          50              180         5849         1631         9172         1399             2667          1024          1014          607           9832         75261         5031         19678         1204         2645         2006

Thursday, January 2, 2025

Page 1 of 1

# CARSON POWER PLANT / SRWTP QUARTERLY EXCESS EMISSIONS REPORT

Quarter 4, 2024

ICE-GEN Total	Date of	TOTAL Emission	ns (IceGe	en + SRW	TP)
CO NOX SOX ROC PM10	Exceedance	NOx	SOx	ROC	PM10
	None				

	SMAQMD LIMITS				CE	C LIMIT	S	
co	<i>NOx</i>	SOx	ROC	PM10	NOx	SOx	ROC	PM10
<i>547.0</i>	310.6	101.6	149.3	147.1	356	65	125	135

Thursday, January 2, 2025

Page 1 of 1

# SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

SO<sub>2</sub> (NO<sub>x</sub>) TRS/H<sub>2</sub>S / CO / Opacity Pollutant (circle one): Reporting Period Dates: From: 10/1/24 To: 12/31/24

Company: **EthosEnergy Group** 2.5 ppm, 5.62 lb/hr **Emission Limitation:** 

Address: 8580 Laguna Station Rd., Elk Grove, CA 95758

Monitor Manufacturer and Model Number: Teledyne Monitor Labs TML-41-M

Date of Latest CEMS Certification or Audit: 6/26/24 Process Unit Description: **Base Load Turbine** 

Total Source Operating Time in Reporting Period: 847.18 hrs

### **EXCESS EMISSIONS SUMMARY<sup>1</sup>**

1. Duration of Excess Emissions in Reporting Period Due to:

a.	Startup/Shutdown	0.0 hrs
	Control Equipment Problems	0.0 hrs
	Process Problems	0.0 hrs
d.	Other Known Causes	0.0 hrs
e.	Unknown Causes	0.0 hrs
2. Total D	uration of Excess Emissions	0.0 hrs
3. <u>(Total I</u>	<u>Duration of Excess Emissions) x (100)</u>	

(Total Source Operation Time)  $0.00 \%^2$ 

### CEMS PERFORMANCE SUMMARY<sup>1</sup>

 $0.00 \, hrs$ 

1. CEMS Downtime in Reporting Period Due to:

ш.	Tromitor Equipment transmissions	0.00 1115
b.	Non-monitor Equipment Malfunctions	0.00 hrs
c.	Quality Assurance Calibration	3.88 hrs
d.	Other Known Causes	12.12 hrs
e.	Unknown Causes	0.00 hrs
2. Total C	EMS Downtime	16.00 hrs
	CEMC D	

Monitor Equipment Malfunctions.....

3. (Total CEMS Downtime) x (100)

(Total Source Operating Time)  $1.89 \%^2$ 

<sup>&</sup>lt;sup>1</sup> For opacity, record in minutes. For gases, record in hours.

<sup>&</sup>lt;sup>2</sup> For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CEMS downtime is five percent or greater of the operating time, both the summary report and the excess emissions report described in Part 60.7.c shall be submitted.

# **SUMMARY REPORT (con't)**

Describe any changes since the last quarter to the CEMS, process, or controls:

There were no changes to the CEMS or emissions control systems this quarter.

I hereby certify that the information in this report is true, accurate, and complete.

Signature:

Name: Jose A. Garcia Title: Facility Manager

Date: 1/14/25

# SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (circle one): SO<sub>2</sub> / NO<sub>x</sub> / TRS/H<sub>2</sub>S (CO )Opacity Reporting Period Dates: From: 10/1/24 To: 12/31/24

Company: **EthosEnergy Group** Emission Limitation: 40 lb/hr

Address: 8580 Laguna Station Rd., Elk Grove, CA 95758

Monitor Manufacturer and Model Number: Teledyne Monitor Labs TML-30

Date of Latest CEMS Certification or Audit: 6/26/24

Process Unit Description: Base Load Turbine

Total Source Operating Time in Reporting Period 847.18 hrs

### **EXCESS EMISSIONS SUMMARY<sup>1</sup>**

1. Duration of Excess Emissions in Reporting Period Due to:

b. c.	Startup/Shutdown  Control Equipment Problems  Process Problems	0.0 hrs 0.0 hrs 0.0 hrs
d.	Other Known Causes	0.0 hrs
e.	Unknown Causes	0.0 hrs
2. Total D	uration of Excess Emissions	0.0 hrs
3. <u>(Total D</u>	Ouration of Excess Emissions) x (100)	
(To	otal Source Operation Time)	$0.00 \%^2$

### **CEMS PERFORMANCE SUMMARY**<sup>1</sup>

1. CEMS Downtime in Reporting Period Due to:

a.	Monitor Equipment Malfunctions	0.00 hrs
b.	Non-monitor Equipment Malfunctions	0.00 hrs
c.	Quality Assurance Calibration	3.88 hrs
d.	Other Known Causes	12.12 hrs
e.	Unknown Causes	0.00 hrs
2. Total C	EMS Downtime	16.00 hrs

3. (Total CEMS Downtime) x (100)

(Total Source Operating Time) 1.89 %<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> For opacity, record in minutes. For gases, record in hours.

<sup>&</sup>lt;sup>2</sup> For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CEMS downtime is five percent or greater of the operating time, both the summary report and the excess emissions report described in Part 60.7.c shall be submitted.

# **SUMMARY REPORT (con't)**

Describe any changes since the last quarter to the CEMS, process, or controls:

There were no changes to the CEMS or emissions control systems this quarter.

I hereby certify that the information in this report is true, accurate, and complete.

Signature:

Name: Jose A. Garcia Title: Facility Manager

Date: 1/14/25

# Carson Power Plant - HRSG 3 Hour Average Exceedance Report

Quarter 4, 2024

DATE CO NOx SOx ROC PM10 NOX/O2 Details Duration Minutes

Thursday, January 2, 2025

# SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (circle one): SO<sub>2</sub> (NO<sub>x</sub>) TRS/H<sub>2</sub>S / CO / Opacity Reporting Period Dates: From: 10/1/24 To: 12/31/24

Company: **EthosEnergy Group** Emission Limitation: 5 ppm, 7.33 lbs/hr

Address: 8580 Laguna Station Rd., Elk Grove, CA 95758

Monitor Manufacturer and Model Number: Teledyne Monitor Labs TML-41-M

Date of Latest CEMS Certification or Audit: 2/27/24

Process Unit Description: Peaking Turbine

Total Source Operating Time in Reporting Period: 35.96 hrs

### **EXCESS EMISSIONS SUMMARY<sup>1</sup>**

1. Duration of Excess Emissions in Reporting Period Due to:

a. S	tartup/Shutdown	0.0 hrs
	Control Equipment Problems	0.0 hrs
	rocess Problems	0.0 hrs
d. C	Other Known Causes	0.0 hrs
e. U	Jnknown Causes	0.0 hrs
2. Total Dura	ation of Excess Emissions	0.0 hrs
3. (Total Dur	ration of Excess Emissions) x (100)	
(Tota	l Source Operation Time)	$0.00 \%^2$

## CEMS PERFORMANCE SUMMARY<sup>1</sup>

1. CEMS Downtime in Reporting Period Due to:

a.	Monitor Equipment Maltunctions	0.0 hrs
b.	Non-monitor Equipment Malfunctions	0.0 hrs
c.	Quality Assurance Calibration	0.33 hrs
d.	Other Known Causes	0.0 hrs
e.	Unknown Causes	0.0 hr
2. Total C	EMS Downtime	0.33 hrs

3. (Total CEMS Downtime) x (100)

(Total Source Operating Time) 0.92 %<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> For opacity, record in minutes. For gases, record in hours.

<sup>&</sup>lt;sup>2</sup> For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CEMS downtime is five percent or greater of the operating time, both the summary report and the excess emissions report described in Part 60.7.c shall be submitted.

# **SUMMARY REPORT (con't)**

Describe any changes since the last quarter to the CEMS, process, or controls:

There were no changes to the CEMS or emissions control systems this quarter.

I hereby certify that the information in this report is true, accurate, and complete.

Signature:

Name: Jose A. Garcia Title: Facility Manager

Date: 1/14/25

# SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (circle one): SO<sub>2</sub> / NO<sub>x</sub> / TRS/H<sub>2</sub>S (CO) Opacity Reporting Period Dates: From: 10/1/24 To: 12/31/24

Company: **EthosEnergy Group** Emission Limitation: 5.93 lb/hr

Address: 8580 Laguna Station Rd., Elk Grove, CA 95758

Monitor Manufacturer and Model Number: Teledyne Monitor Labs TML-30

Date of Latest CEMS Certification or Audit: 2/27/24

Process Unit Description: Peaking Turbine

Total Source Operating Time in Reporting Period: 35.96 hrs

### **EXCESS EMISSIONS SUMMARY<sup>1</sup>**

1. Duration of Excess Emissions in Reporting Period Due to:

b. c. d.	Startup/Shutdown  Control Equipment Problems  Process Problems  Other Known Causes  Unknown Causes	0.0 hrs 0.0 hrs 0.0 hrs 0.0 hrs 0.0 hrs				
	uration of Excess Emissions	0.0 hrs				
	3. (Total Duration of Excess Emissions) x (100) (Total Source Operation Time)					

1. CEMS Downtime in Reporting Period Due to:

a.	Monitor Equipment Malfunctions	0.0 hrs
b.	Non-monitor Equipment Malfunctions	0.0 hrs
c.	Quality Assurance Calibration	0.33 hrs
d.	Other Known Causes	0.0 hrs
e.	Unknown Causes	0.0 hrs
പ വ	FMS Downtine	0.33 hrs

CEMS PERFORMANCE SUMMARY<sup>1</sup>

2. Total CEMS Downtime 0.33 hrs

3. (Total CEMS Downtime) x (100)

(Total Source Operating Time) 0.92 %<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> For opacity, record in minutes. For gases, record in hours.

<sup>&</sup>lt;sup>2</sup> For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CEMS downtime is five percent or greater of the operating time, both the summary report and the excess emissions report described in Part 60.7.c shall be submitted.

# **SUMMARY REPORT (con't)**

Describe any changes since the last quarter to the CEMS, process, or controls:

There were no changes to the CEMS or emissions control systems this quarter.

I hereby certify that the information in this report is true, accurate, and complete.

Signature:

Name: Jose A. Garcia Title: Facility Manager

Date: 1/14/25

# Carson Power Plant - PKR 3 Hour Average Exceedance Report

Quarter 4, 2024

DATE CO NOx SOx ROC PM10 NOX/O2 Details Duration Minutes

Thursday, January 2, 2025

# Carson Power Plant Emergency Diesel Emissions Report

# **Quarter 4 2024**

<b>Qtrly Operati</b>	ng Details	These Limits and Reported Quanities are in Lbs.					bs.	Tons	
Date	Hours	CO	NOx	ROC	PM10	SOx	PM2.5	GHG	
10/2/2024	0.30	2.93	5.77	0.26	0.17	0.003	0.17	0.14	
10/21/2024	0.90	8.78	17.30	0.79	0.52	0.009	0.52	0.43	
10/24/2024	0.20	1.95	3.84	0.18	0.12	0.002	0.12	0.09	
11/7/2024	0.70	6.83	13.45	0.62	0.41	0.007	0.41	0.33	
11/9/2024	0.40	3.90	7.69	0.35	0.23	0.004	0.23	0.19	
11/15/2024	0.60	5.85	11.53	0.53	0.35	0.006	0.35	0.28	
12/16/2024	0.20	1.95	3.84	0.18	0.12	0.002	0.12	0.09	
Totals	3.30 etors (lbs/hour)	32.18	63.43	2.90	1.91	0.03	1.91	1.56	3.
Emissions Fac	ctors (ibs/iiour)	CO	NOx	ROC	PM10	SOx	PM2.5	GHG	
		9.75	19.22	0.88	0.58	0.01	0.58	947	
Annual Emiss	sions Summary (lbs)								
	QTR	CO	NOx	ROC	PM10	SOx	PM2.5	GHG	Н
	1	75.08	147.99	6.78	4.47	0.08	4.47	3.65	7.
	2	78.00	153.76	7.04	4.64	0.08	4.64	3.79	8.
	3	9.75	19.22	0.88	0.58	0.01	0.58	0.47	1.
	4	32.18	63.43	2.90	1.91	0.03	1.914	1.56	3.
	Totals	195.01	384.40	17.60	11.60	0.20	11.60	9.47	20

trly Dieso	el Hours Summary		
	Maintenance Hours 3.3	<b>Emergency Hours</b>	<b>Total</b> 3.3
Limits	30	200	

ınual Di	esel Hours Summary		
	Maintenance Hours 20.0	<b>Emergency Hours</b>	<b>Total</b> 20.0
Limits	30	200	

# SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (circle one): SO<sub>2</sub> (NO<sub>x</sub>) TRS/H<sub>2</sub>S / CO / Opacity Reporting Period Dates: From: 10/1/24 To: 12/31/24

Company: EthosEnergy Group

Emission Limitation: 5.0 ppm, 21.1 lb/day

Address: 8580 Laguna Station Rd., Elk Grove, CA 95758

Monitor Manufacturer and Model Number: Teledyne Monitor Labs T200M

Date of Latest CEMS Certification or Audit: 2/28/24

Process Unit Description: Auxiliary Boiler

Total Source Operating Time in Reporting Period: 937.43 hrs

### **EXCESS EMISSIONS SUMMARY<sup>1</sup>**

1. Duration of Excess Emissions in Reporting Period Due to:

b. c. d.	Startup/Shutdown Control Equipment Problems Process Problems Other Known Causes Unknown Causes	0.0 hrs 0.0 hrs 0.0 hrs 0.0 hrs 0.0 hrs
	uration of Excess Emissions	0.0 hrs
-	Ouration of Excess Emissions) x (100) otal Source Operation Time)	$0.00 \%^{2}$

# CEMS PERFORMANCE SUMMARY<sup>1</sup>

1. CEMS Downtime in Reporting Period Due to:

2.3.

a.	Monitor Equipment Malfunctions	0.00 hrs
b.	Non-monitor Equipment Malfunctions	0.00 hrs
	Quality Assurance Calibration	1.83 hrs
d.	Other Known Causes	2.15 hrs
e.	Unknown Causes	0.00 hrs
Total Cl	EMS Downtime	3.98 hrs
(Total C	EMS Downtime) x (100)	
(Total	Source Operating Time)	$0.42 \%^2$

<sup>&</sup>lt;sup>1</sup> For opacity, record in minutes. For gases, record in hours.

<sup>&</sup>lt;sup>2</sup> For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CEMS downtime is five percent or greater of the operating time, both the summary report and the excess emissions report described in Part 60.7.c shall be submitted.

# **SUMMARY REPORT (con't)**

Describe any changes since the last quarter to the CEMS, process, or controls:

There were no changes to the CEMS or emissions control systems this quarter.

I hereby certify that the information in this report is true, accurate, and complete.

Signature:

Name: Jose A. Garcia Title: Facility Manager

Date: 1/14/25

# **SUMMARY REPORT** GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (circle one): SO<sub>2</sub> / NO<sub>x</sub> / TRS/H<sub>2</sub>S (CO )Opacity Reporting Period Dates: From: 10/1/25 To: 12/31/24

Company: **EthosEnergy Group** Emission Limitation: 492.5 lb/day

8580 Laguna Station Rd., Elk Grove, CA 95758 Address:

Monitor Manufacturer and Model Number: Teledyne Monitor Labs T300M

Date of Latest CEMS Certification or Audit: 2/28/24

Process Unit Description: Auxiliary Boiler

Total Source Operating Time in Reporting Period 937.43 hrs

### **EXCESS EMISSIONS SUMMARY<sup>1</sup>**

1. Duration of Excess Emissions in Reporting Period Due to:

b. c.	Startup/Shutdown  Control Equipment Problems  Process Problems  Other Known Causes	0.0 hrs 0.0 hrs 0.0 hrs 0.0 hrs				
e.	Unknown Causes	0.0 hrs				
<b>-</b> . 100012	uration of Excess Emissions	0.0 hrs				
	3. (Total Duration of Excess Emissions) x (100) (Total Source Operation Time)					

(Total Source Operation Time) 0.00 %

### CEMS PERFORMANCE SUMMARY<sup>1</sup>

1. CEMS Downtime in Reporting Period Due to:

	a.	Monitor Equipment Malfunctions	0.00 hrs					
	b.	Non-monitor Equipment Malfunctions	0.00 hrs					
		Quality Assurance Calibration	1.83 hrs					
		Other Known Causes	2.15 hrs					
		Unknown Causes	0.00 hrs					
2.	Total C	EMS Downtime	3.98 hrs					
3.	(Total C	EEMS Downtime) x (100)						
	(Total Source Operating Time)							

<sup>&</sup>lt;sup>1</sup> For opacity, record in minutes. For gases, record in hours.

<sup>&</sup>lt;sup>2</sup> For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CEMS downtime is five percent or greater of the operating time, both the summary report and the excess emissions report described in Part 60.7.c shall be submitted.

# **SUMMARY REPORT (con't)**

Describe any changes since the last quarter to the CEMS, process, or controls:

There were no changes to the CEMS or emissions control systems this quarter.

I hereby certify that the information in this report is true, accurate, and complete.

Signature:

Name: Jose A. Garcia Title: Facility Manager

Date: 1/14/25

Aux Boiler Quarterly Mass Report								
Date / Time	CO LBS	Gas Flow	Nox Lbs	PM10 LBS	PM2 5 LBS	Sox LBS	VOC LBS	
12/31/2024 11:00:00 PM	0.1	21.137	32.8	104.6	104.6	10.82	80.32	
Limits	23.404	118.8	905	590	590	71	448	

Thursday, January 2, 2025 Page 1 of 1

# Aux Boiler Quarterly Daily Mass Report

Time	CO LBS	Nox LBS	PM10 LBS	PM2 5 LBS	SOX LBS	VOC LBS
10/1/2024	0	0	0	0	0	0
10/2/2024	0	0	0	0	0	0
10/3/2024	0	0	0	0	0	0
10/4/2024	0	0	0	0	0	0
10/5/2024	0	0	0	0	0	0
10/6/2024	0	0	0	0	0	0
10/7/2024	0	0	0	0	0	0
10/8/2024	0	0	0	0	0	0
10/9/2024	0	0	0	0	0	0
10/10/2024	0	0	0	0	0	0
10/11/2024	0	0	0	0	0	0
10/12/2024	0	0	0	0	0	0
10/13/2024	0	0	0	0	0	0
10/14/2024	0	0	0	0	0	0
10/15/2024	0	0.06	0.04	0.04	0	0.03
10/16/2024	0	1.05	2.86	2.86	0.32	2.17
10/17/2024	0	0.95	2.74	2.74	0.27	2.11
10/18/2024	0	1.25	2.84	2.84	0.32	2.17
10/19/2024	0	1.27	2.88	2.88	0.31	2.16
10/20/2024	0	1.03	2.76	2.76	0.28	2.09
10/21/2024	0	1.43	2.81	2.81	0.32	2.18

Thursday, January 2, 2025 Page 1 of 5

Time	CO LBS	Nox LBS	PM10 LBS	PM2 5 LBS	SOX LBS	VOC LBS
10/22/2024	0	0.77	2.62	2.62	0.24	1.99
10/23/2024	0	0.64	2.55	2.55	0.25	1.99
10/24/2024	0	0.96	2.47	2.47	0.24	1.92
10/25/2024	0	0.65	2.51	2.51	0.24	1.95
10/26/2024	0	0.55	2.47	2.47	0.24	1.94
10/27/2024	0	0.5	2.52	2.52	0.24	1.92
10/28/2024	0	0.51	2.5	2.5	0.24	1.93
10/29/2024	0	0.56	2.42	2.42	0.24	1.92
10/30/2024	0	0.59	2.5	2.5	0.24	1.93
10/31/2024	0	0.6	2.44	2.44	0.24	1.92
11/1/2024	0	0.63	2.53	2.53	0.25	1.99
11/2/2024	0	0.73	2.66	2.66	0.29	2.05
11/3/2024	0	0.85	2.67	2.67	0.28	2.07
11/4/2024	0	0.91	2.61	2.61	0.24	2.02
11/5/2024	0	0.72	2.49	2.49	0.24	1.93
11/6/2024	0	0.74	2.5	2.5	0.24	1.95
11/7/2024	0	0.86	2.63	2.63	0.24	2.01
11/8/2024	0	0.79	2.56	2.56	0.24	1.99
11/9/2024	0	0.31	1.12	1.12	0.11	0.85
11/10/2024	0	0	0	0	0	0
11/11/2024	0	0	0	0	0	0
11/12/2024	0	0	0	0	0	0
11/13/2024	0	0	0	0	0	0

Thursday, January 2, 2025 Page 2 of 5

Time	CO LBS	Nox LBS	PM10 LBS	PM2 5 LBS	SOX LBS	VOC LBS
11/14/2024	0.1	0.65	1.01	1.01	0.1	0.76
11/15/2024	0	0.72	2.55	2.55	0.24	1.99
11/16/2024	0	0.73	2.59	2.59	0.24	1.99
11/17/2024	0	0.64	2.61	2.61	0.25	2.01
11/18/2024	0	0.73	2.66	2.66	0.25	2.04
11/19/2024	0	0.5	1.79	1.79	0.17	1.37
11/20/2024	0	0	0	0	0	0
11/21/2024	0	0	0	0	0	0
11/22/2024	0	0	0	0	0	0
11/23/2024	0	0.1	0.19	0.19	0.02	0.15
11/24/2024	0	0.73	2.74	2.74	0.31	2.1
11/25/2024	0	0.75	2.84	2.84	0.3	2.17
11/26/2024	0	0.76	2.79	2.79	0.24	2.1
11/27/2024	0	1.04	2.89	2.89	0.35	2.18
11/28/2024	0	0.89	2.87	2.87	0.33	2.19
11/29/2024	0	1.01	2.93	2.93	0.35	2.21
11/30/2024	0	0.98	2.96	2.96	0.36	2.25
12/1/2024	0	0.94	2.92	2.92	0.35	2.17
12/2/2024	0	0.73	2.15	2.15	0.26	1.66
12/3/2024	0	0	0	0	0	0
12/4/2024	0	0	0	0	0	0
12/5/2024	0	0	0	0	0	0
12/6/2024	0	0	0	0	0	0

Thursday, January 2, 2025 Page 3 of 5

Time	CO LBS	Nox LBS	PM10 LBS	PM2 5 LBS	SOX LBS	VOC LBS
12/7/2024	0	0	0	0	0	0
12/8/2024	0	0	0	0	0	0
12/9/2024	0	0	0	0	0	0
12/10/2024	0	0	0	0	0	0
12/11/2024	0	0	0	0	0	0
12/12/2024	0	0	0	0	0	0
12/13/2024	0	0	0	0	0	0
12/14/2024	0	0	0	0	0	0
12/15/2024	0	0	0	0	0	0
12/16/2024	0	0	0	0	0	0
12/17/2024	0	0	0	0	0	0
12/18/2024	0	0.98	2.41	2.41	0.34	1.8
12/19/2024	0	0	0	0	0	0
12/20/2024	0	0	0	0	0	0
12/21/2024	0	0	0	0	0	0
12/22/2024	0	0	0	0	0	0
12/23/2024	0	0	0	0	0	0
12/24/2024	0	0	0	0	0	0
12/25/2024	0	0	0	0	0	0
12/26/2024	0	0	0	0	0	0
12/27/2024	0	0	0	0	0	0
12/28/2024	0	0	0	0	0	0
12/29/2024	0	0	0	0	0	0

Thursday, January 2, 2025 Page 4 of 5

Time	CO LBS	Nox LBS	PM10 LBS	PM2 5 LBS	SOX LBS	VOC LBS
12/30/2024	0	0	0	0	0	0
12/31/2024	0	0	0	0	0	0

Thursday, January 2, 2025 Page 5 of 5

# Cooling Tower PM10 Report

Date	TOWER P	M10	
		11/3/2024	0.00
10/1/2024	1.88	11/4/2024	0.00
10/2/2024	1.79	11/5/2024	0.00
10/3/2024	1.82	11/6/2024	0.00
10/4/2024	1.80	11/7/2024	0.00
10/5/2024	1.82	11/8/2024	0.00
10/6/2024	1.82	11/9/2024	0.03
10/7/2024	1.85	11/10/2024	0.16
10/8/2024	1.92	11/11/2024	0.19
10/9/2024	1.91	11/12/2024	0.00
10/10/2024	1.90	11/13/2024	0.00
10/11/2024	1.92	11/14/2024	0.02
10/12/2024	1.92	11/15/2024	0.21
10/13/2024	1.92	11/16/2024	0.00
10/14/2024	1.92	11/17/2024	0.00
10/15/2024	1.84	11/18/2024	0.00
10/16/2024	0.00	11/19/2024	0.68
10/17/2024	0.01	11/20/2024	1.87
10/18/2024	0.00	11/21/2024	1.92
10/19/2024	0.00	11/22/2024	1.91
10/20/2024	0.00	11/23/2024	1.66
10/21/2024	0.01	11/24/2024	0.00
10/22/2024	0.00	11/25/2024	0.00
10/23/2024	0.00	11/26/2024	0.00
10/24/2024	0.81	11/27/2024	0.00
10/25/2024	0.73	11/28/2024	0.00
10/26/2024	0.00	11/29/2024	0.00
10/27/2024	0.00	11/30/2024	0.00
10/28/2024	0.00	12/1/2024	0.00
10/29/2024	0.00	12/2/2024	0.50
10/30/2024	0.00	12/3/2024	1.87
10/31/2024	0.00	12/4/2024	1.92
11/1/2024	0.00	12/5/2024	1.92
11/2/2024	0.00	12/6/2024	1.92

Thursday, January 2, 2025

Date	TOWER PM10
12/7/2024	1.92
12/8/2024	1.92
12/9/2024	1.89
12/10/2024	1.92
12/11/2024	1.92
12/12/2024	1.92
12/13/2024	1.92
12/14/2024	1.92
12/15/2024	1.92
12/16/2024	1.92
12/17/2024	1.92
12/18/2024	0.53
12/19/2024	0.73
12/20/2024	0.00
12/21/2024	0.00
12/22/2024	0.00
12/23/2024	0.00
12/24/2024	0.00
12/25/2024	0.00
12/26/2024	0.00
12/27/2024	0.00
12/28/2024	0.00
12/29/2024	0.00
12/30/2024	0.00
12/31/2024	0.00

**Quarter Total** 



January 8, 2025

Chris Loscher
Sacramento Metropolitan
Air Quality Management District
777 12<sup>th</sup> Street, 3<sup>rd</sup> Floor.
Sacramento, CA 95814-1908

### **RE: QUARTERLY CERTIFICATION**

This letter certifies that the designated representative of the Carson Power Plant Facility for the Acid Rain Program has electronically submitted to the U.S. EPA all of the data and information as required by 40 CFR 75.64 for the Fourth Quarter of 2024. This letter is submitted in accordance with the requirements of Sacramento Metropolitan Air Quality Management District's (SMAQMD) Permit to Operate Nos. 22021, 22022, 22066 and 11015, Reporting Requirements, Condition No. 23, and Permit to Operate, No. TV2015-07-01A, Equipment Specific Requirements – Peaking Gas Turbine, Reporting Requirements, Condition No. 9.

If you have any questions regarding this matter, please contact Jose A. Garcia at (916) 429-4345.

Sincerely,

Jose A. Garcia Facility Manager

### Ethos Energy CEMS Maintenance Log

	Tir	ne		Sys	tem			Monitor			Catego	ry	
Date	Off	On	C/C	Online	PKR	Online	NOx	СО	H2S	Q/A Cal	Maint	Breakdown	Comments
10/2/2024	1530	1550			Х	Х	Х	Х		Х			START UP CAL PEAKER
10/3/2024	1921	1941			Х	Х	Х	Х		Х			START UP CAL PEAKER
10/8/2024	1240	1410	Χ	Х			Х	Х			Х		MONTHLY MAINTENANCE
10/8/2024	1432	1537			Х		Х	Х			Х		MONTHLY MAINTENANCE
10/8/2024	1446	1532	Χ	Х		Х	Χ	Х			Χ		LO NOX CAL GAS BOTTLE CHANGED
10/8/2024	1542	1606	Χ	Х		Х	Χ	Х		Х			MAINT CAL
10/8/2024	1623	1645	Χ	Х		Х	Х	Х		Х			START UP CAL
10/8/2024	1649	1709			Χ	Х	Х	Х		Х			HANDS OFF CAL
10/8/2024	1650	1714	Χ	Х			Х	Х		Х			FAILED CAL
10/8/2024	1715	1735	Χ	Х			Χ	Х		Х			HANDS OFF CAL
10/9/2024	0827	1228	Χ	Х			Χ	Х			Х		MAINT CAL
10/9/2024	1302	1322	Χ	Х			Χ	Х		Х			HANDS OFF CAL
10/15/2024	0726	0820	Χ	Х			Χ	Х			Х		HI NOX CAL GAS BOTTLE CHANGE
10/15/2024	0827	0847	Χ	Х			Χ	Х		Х			HANDS OFF CAL
10/15/2024	0856	0934			Х		Х	Х			Х		HI NOX CAL GAS BOTTLE CHANGE
10/15/2024	0936	0956			Х		Х	Х		Х			HANDS OFF CAL
10/30/2024	1031	1610			Х		Χ	Х			Х		ANNUAL MAINT.
10/30/2024	1611	1631			Х		Χ	Х		Х			HANDS OFF CAL
10/30/2024	1636	1653			Х		Х	Х			Х		MAINT CAL
11/13/2024	0835	0903	Χ				Х	Х			Х		MAINT OUTPUT TES
11/13/2024	0907	0928	Х				Х	Х		Х			HANDS OFF CAL
11/13/2024	0940	1004	Х				Х	Х			Х		WIRE TERMINATIONS
11/19/2024	0702	0722	Х				Х	Х			Х		MAINT CAL
11/19/2024	0724	0748	Х				Χ	Х		Х			HANDS OFF CAL
11/19/2024	2212	2232	Х	Х			Χ	Х		Х			START UP CAL
11/21/2024	0752	0821	Х	Х			Χ	Х			Х		MAINT CAL
11/21/2024	0822	0844	Х	Х			Χ	Х		Х			HANDS OFF CAL
11/22/2024	1002	1022			Χ		Х	X			Х		MAINT CAL
11/22/2024	1023	1044			Χ		Χ	Х		Х			HANDS OFF CAL
11/22/2024	1112	1133			Χ	X	Χ	X		X			START UP CAL PEAKER
11/23/2024	1053	1128	Χ				Х	Х			Χ		HI NOX CAL GAS BOTTLE CHANGE
11/23/2024	1206	1258			Χ		Χ	Χ			Χ		HI NOX CAL GAS BOTTLE CHANGE
12/2/2024	1241	1305	Χ				Х	X			Χ		MAINT CAL
12/2/2024	1306	1327	Х		-		Х	Х		Х			HANDS OFF CAL
12/2/2024	1628	1648	Х	Х	-		Х	Х		Х			START UP CAL
12/3/2024	0934	1210	Χ	Χ			Х	X			Χ		LINEARITY
12/3/2024	1300	1410	Χ	Χ			Х	X			Χ		LINEARITY
12/12/2024	0843	0924	Χ	Χ			Х	X			Χ		LO NOX CAL GAS BOTTLE CHANGED
12/12/2024	0926	0947	Χ	Χ			Х	X		Х			HANDS OFF CAL
12/12/2024	0932	1006			Χ		Х	Х			Χ		LO NOX CAL GAS BOTTLE CHANGED
12/12/2024	1009	1029			Χ		Х	Х		Х			HANDS OFF CAL
12/16/2024	0856	1052			Χ		Χ	Х			Χ		MONTHLY MAINTENANCE
12/16/2024	1054	1115			Χ		Χ	Х		Х			HANDS OFF CAL
12/18/2024	1551	1616	Χ				Χ	Х					HI NOX CAL GAS BOTTLE CHANGED
12/18/2024	1617	1637	Χ				Χ	Х		Х			HANDS OFF CAL
12/18/2024	1922	1942	Χ	Х			Χ	Х		Х			START UP CAL
12/30/2024	1023	1057	Χ				Χ	Х			Χ		MONTHLY MAINTENANCE
12/30/2024	1058	1118	Χ				Х	Х		X			HANDS OFF CAL

## Ethos Energy Auxilary Boiler CEMS Maintenance Log

	Tin	ne	Sys	stem	Mor	nitor		Catego	ry	
Date	Off	On	Aux.	Online	NOx	CO	Q/A Cal	Maint	Breakdown	Comments
10/16/2024	0848	0946	Χ	Х	Χ	Χ		Х		DAILY LOW / 02 BOTTLE CHANGED
10/16/2024	0947	1007	Х	Х	Χ	Χ	X			HANDS OFF CAL
11/14/2024	1147	1220	Х		Χ	Χ		Χ		DAILY HIGH BOTTLE CHANGE
11/14/2024	1230	1250	Χ		Χ	Χ	X			HANDS OFF CAL
11/23/2024	2036	2056	Χ	X	Χ	Χ	X			START UP CAL
11/27/2024	0737	0848	Χ	X	Χ	Χ		Χ		MONTHLY MAINT. / CAL GAS BOTTLE CH.
11/27/2024	0849	0909	Χ	X	Χ	Χ	X			HANDS OFF CAL
12/4/2024	1000	1034	Χ	X	Χ	Χ	X			PRE CGA GAS FLOW SPAN CHECK
12/17/2024	2052	2108	Χ	X	Χ	Χ	X			START UP CAL
12/30/2024	0902	0930	Χ		Χ	Χ		Χ		MONTHLY MAINT.
12/30/2024	0932	0953	Χ		Χ	Х	Χ			HANDS OFF CAL

# CARSON POWER PLANT - RECORD KEEPING STATIONARY INTERNAL COMBUSTION ENGINE

**EQUIPMENT:** 830 BHP Detroit Diesel **YEAR:** 2014 **PERMIT No.:** 11020

**Annual Limit: 30 hours for Maintenance Annual Limit: 200 hours for All Operation** 

# **Annual Maintenance Requirements**

✓	Change engine oil and filter	Date Completed:	7/25/2024
✓	Inspect Air Cleaner	Date Completed:	7/25/2024
V	Inspect all hoses and belts	Date Completed:	7/25/2024

	REASON		HOUR METE	R READINGS		
DATE OF OPERATION	FOR OPERATION (M) or (E)	START HOURS	STOP HOURS	DAILY HRS FOR (M)	DAILY HRS FOR (E)	COMMENTS
1/26/24	M	557.4	558.0	0.6		
1/29/24	M	558.0	559.2	1.2		
1/30/24	M	559.2	564.9	5.7		
2/29/24	M	564.9	565.1	0.2		
	1ST Q	TR TOTAL	HRS:	7.7	0.0	
4/5/24	M	565.1	565.5	0.4		
4/9/24	M	565.5	565.9	0.4		
4/12/24	M	565.9	566.3	0.4		
4/27/24	M	566.3	566.9	0.6		
4/28/24	M	566.9	567.9	1.0		
5/27/24	M	567.9	568.0	0.1		
6/17/24	M	568	568.4	0.4		
6/18/24	M	568.4	568.9	0.5		
6/22/24	M	568.9	571.5	2.6		
6/22/24	M	571.5	573.1	1.6		
	2ND Q	TR TOTAL	HRS:	8.0	0.0	
7/25/24	M	573.1	573.4	0.3		
8/6/24	M	573.4	573.7	0.3		
9/4/24	M	573.7	574.1	0.4		
	3RD Q	TR TOTAL	HRS:	1.0	0.0	
10/2/24	M	574.1	574.4	0.3		
10/21/24	M	574.4	575.3	0.9		
10/24/24	M	575.3	575.5	0.2		
11/7/24	M	575.5	576.2	0.7		
11/9/24	M	576.2	576.6	0.4		
11/15/24	M	576.6	577.2	0.6		
12/16/24	M	577.2	577.4	0.2		
	4TH Q	TR TOTAL	HRS:	3.3	0.0	
	ANNUAL	TOTAL HO	DURS:	20.0	0.0	Total Hours = 20.0



(enter year here)

777 12th Street, Ste. 300 Sacramento, CA 95814 Office (279) 207-1122 Fax (279) 207-1144

Compliance@airquality.org

## **ANNUAL REPORT – ENGINE**

**Company Name:** Permit #: Facility Address: Facility Contact: Facility Contact Title: **Phone Number** E-Mail: Instructions: Enter engine run time. If run time is not available, enter fuel usage to report engine operation information. If entering fuel usage, specify the fuel type (Diesel, Natural Gas, Propane, Gasoline, Waste Gas/Other) and the units of measurement (cubic feet, therms). Identify the location of the closest residence and business, by entering the distance (in feet) and the Quad Number that best describes the location (NE, SE, SW, NW) for diesel engines only. o If distance information was submitted in prior reporting years and has not changed, you may indicate that in the table below. This information does not need to be reported again unless any changes in the distance information have occurred. Closest Residence and Business (Diesel Engines Only) ☐ Distance information has not changed and has been submitted previously. Distance (ft) **Quad Number** Category Closest Residence and Business /v/ NW NE Residence Quad 4 Quad 1 Business Quad 3 Quad 2 SW Run Time (Hours) Usage Qtr 2 **Annual Total** Qtr 1 Qtr 3 Qtr 4 Maintenance\* Emergency\* Other **Fuel Usage** ☐ Actual ☐ Purchased ☐ N/A - run time submitted **Fuel Type:** Units: \*Maintenance / Emergency definitions can be found in your permit.

Any information presented must be true and correct to the best of your knowledge. California Health and Safety Code 42400.3.5 and 42402.4 establish separate criminal and civil penalties for any person who, knowingly and with intent to deceive, falsifies any document required to be kept pursuant to any rule, regulation, permit, or order from the Sacramento Metropolitan Air Quality Management District. By signing below, I certify that all information is true and accurate and

complete, to the best of my knowledge and ability.

Name: \_\_\_\_\_\_ Signature: \_\_\_\_\_\_\_ Signature: \_\_\_\_\_\_ Date: \_\_\_\_\_

# CARSON POWER PLANT SPPE CONDITIONS OF EXEMPTION

	CONDITIONS OF EXEMPTION											
NO.	CONDITION DESCRIPTION  AND VERIFICATION	NEXT REPORT DUE	STATUS	COMMENTS								
AIR QUALIT	AIR QUALITY											
AQ-1	Submit quarterly summaries of plant operating data. Submit source test report annually	Within 30 days of end of qtr	On going reporting	Data reports submitted quarterly. Copies of annual source tests submitted within 60 days of test completion								
AQ-2	Report all exceedances of daily emissions limits	Report within 24 hrs of execeedance	On going reporting	No exceedances of daily limits recorded								
AQ-3	Submit copies of ERC certificates for Nox reductions at Campbells soup	45 days prior to start up	Completed	Construction / Startup compliance activity								
AQ-4	Report completion of paving on plant frontage road. Report road maintenance done or expected	Annual report	On going reporting	No road work done or anticipated								
AQ-5	Submit copies of ERC certificates for ROC reductions at Swansons cleaners.	45 days prior to start up	Completed	Construction / Startup compliance activity								
BIOLOGICA	L RESOURCES											
BIO-1	Submit name, address, qualification and phone # of designated biologist for project. Notify CEC of replacement as necessary	30 days prior to commencing site prep	Completed	Construction / Startup compliance activity								
BIO-2	Designated biologist to perform duties listed in this condition. Report on performance of designated biologist	Monthly Compliance reports	Completed	Construction / Startup compliance activity								
BIO-3	Designated biologist to report conflicts arising from recommendations. Biologist to file report of details of incident and measures taken to reduce inpacts	Within 24 hours of incident	Completed	Construction / Startup compliance activity								
BIO-4	Suspension of construction will occur when recommendations by biologist cannot be implemented.	Upon notification	Completed	Construction / Startup compliance activity								
BIO-5	Implement an employee biological resource sensitivity training for all employees, contractors and subcontractors	Prior to working in site	Completed	Construction / Startup compliance activity								
BIO-6	Implement no entry zone protective measures to protect burrowing owls from physical damage or disturbance	Notify CPM 20 days prior to commencement of site prep	Completed	Construction / Startup compliance activity								

# CVFA CARSON ICEGEN COGENERATION PROJECT SPPE - CONDITIONS OF EXEMPTION

	SITE - CONDITIONS OF EAEMITHON									
NO.	CONDITION DESCRIPTION AND VERIFICATION	NEXT REPORT DUE	STATUS	COMMENTS						
BIO-7	Submit burrowing owl monitoring protocol. Conduct monitoring for a minimum of 5 years.	30 days prior to site commencement of site prep	Completed	Monitoring was conducted through the fifth operating year.  Monitoring was discontinued after that point due to no documented owl activity. Reports filed with CPM						
BIO-8	Submit annual burrowing owl monitoring report	Annually by 30 Oct	Completed	Annual reports were filed during the monitoring period.  Monitoring requirements completed						
BIO-9	Submit compensation for loss of Swainson hawk habitat. Make one time and continuing payments to TNC	One time payments due before commencement of site prep. Annual payments of long term management funds	Ongoing	Payment submitted in 2024. Next payment is due in May 2025.						
HAZARDOU	US MATERIALS HANDLING									
Haz-1	Submit written request to CECE prior to user of Hazardous materials >200 gallons	Request made per Haz-1	Completed	Construction / Startup compliance activity						
Haz-2	Develop and implement a Safety Management plan	Prior to accepting delivery of Haz chemical	Completed	Construction / Startup compliance activity						
Haz-3	Construct CEC approved spill containment structures for delivery vehicles to contain any spills during delivery transfer	Prior to accepting delivery of Haz Chemical	Completed	Construction / Startup compliance activity						
Haz-4	Submit Hazmat Business Plan and RMP to CEC for Approval	60 days prior to expected delivery of hazardous or acutely hazardous material	Completed	Construction / Startup compliance activity						



Sacramento Office 830 S St Sacramento, CA 95811

April 15, 2024

Central Valley Financing Authority c/o SMUD Attn: Pedro Juarez and Laurie Johnson P.O. Box 15830 MS EA405 Sacramento, CA 95852-0830

Re: Invoice for Swainson's Hawk Habitat Compensation for the Carson Ice-Gen Project

Condition of Exemption number 9 of the Commission Decision for the Carson Ice-Gen Project says, in part, that CEG/CVFA shall compensate for the loss of Swainson's hawk foraging habitat at the Ice-Gen project site (and shall) give The Nature Conservancy (TNC) \$1,500 annually, in perpetuity, in cash, cashier's check or money order for long-term management of the habitat compensation lands acquired for this project, or other lands within the Cosumnes River Preserve or its watershed that TNC, considering ecosystem level relationships, judges will benefit the compensation lands.

Period: May 2, 2024 – May 1, 2025

Amount Due: \$1,500

Remit to: The Nature Conservancy

Attn: Accounts Receivable

830 S Street

Sacramento, CA 95811

Tel: (916) 642-8051

E-Mail: teela.pejsa@tnc.org